

# 17

## Competitions, Votes and Interactivity



# Competitions, Votes and Interactivity

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## 17.1 Introduction

BBC audiences expect to be able to interact with its content in the most creative and innovative ways possible. Large sections of the audience have grown up with gaming and social media as a fundamental part of their lives and rapid developments in technologies such as AI and immersive experiences are bringing other editorial opportunities and challenges. The BBC aims to offer opportunities for interactivity to everyone by using different platforms in different ways.

This section includes all forms of audience interaction including social media, phone-ins and relevant formats such as game shows, talent searches and quizzes.

To enrich its offering and enhance audience experiences as much as possible the BBC's UK Public Services are likely to undertake deals and partnerships with commercial organisations who may provide technology, research and innovations. It is important that such arrangements do not act as a commercial service or are designed to make a profit if they are intended as a UK Public Service activity.

Activity by Public Services and some Commercial Services in this domain are regulated by the Ofcom Broadcasting Code (notably sections 2, 5, 7, 8, 9 and 10), and UK Public Services and the BBC World Service must conform to the Statement of Policy on Use of Alternative Finance in BBC Content<sup>1</sup>.

## 17.2 Principles

- 17.2.1 All audience interactivity must be conducted in a manner that is honest and fair.
- 17.2.2 Entrants and contestants must always be treated fairly, properly and in accordance with the rules/terms and conditions.

<sup>1</sup> Statement of Policy on Use of Alternative Finance in BBC Content (Clause 49 (4) of the BBC Framework Agreement 2016)

- 17.2.3 Audiences must not be materially misled about any competition or vote.
- 17.2.4 All BBC competitions, votes and awards on UK Public Services and the World Service must comply with the BBC's Code of Conduct for Competitions and Voting.  
**See** Code of Conduct for Competitions and Voting online
- 17.2.5 When the BBC offers interactivity it must be distinctive and match the expectations of the likely audience. On UK Public Services and the World Service, it must add public value, be editorially justified and enhance output in a way that fits the public service remit.
- 17.2.6 The privacy of everyone who interacts with the BBC must be respected. The storage and disposal of personal information must be carried out in accordance with all relevant BBC group data protection policies.  
**See** Section 7 Privacy: 7.1
- 17.2.7 Interactivity may be set up and approved in advance as a method of raising money for a cross-BBC charity fundraising initiative. It must also be available to the target audience.
- 17.2.8 On UK Public Services and the World Service, jointly organised competitions, donated prizes for viewer, listener or online competitions, and external funding of a prize, bursary or award, must conform to the Statement of Policy on Use of Alternative Finance in BBC Content<sup>2</sup>.
- 17.2.9 When working in partnership with others, the BBC must maintain overall editorial control of interactivity in its output.

2 Statement of Policy on Use of Alternative Finance in BBC Content (Clause 49 (4) of the BBC Framework Agreement 2016)

- 17.2.10 References to commercial platforms and service providers as a method of entry must be editorially justified and not unduly prominent.  
**See** Section 15 Independence from Commercial and Other External Interests: 15.4.3–15.4.4
- 17.2.11 BBC employees, employees of BBC brand licensees and their immediate families and close associates may not normally enter BBC competitions, talent searches and prize draws.
- 17.2.12 When interacting with audiences using new technologies and platforms, BBC teams and those who work for it must conduct all activity in a manner that is consistent with the BBC's editorial values.
- 17.2.13 The BBC should aim to make audience interactivity and availability of opportunities via competitions, awards and talent searches, as accessible as possible.

## 17.3 Mandatory Referrals— must be referred in advance

***Mandatory referrals are an essential part of the BBC's editorial and compliance process and must be observed.***

- 17.3.1 All BBC competitions and votes must be approved by a senior editorial figure.  
**See** 17.4.2
- 17.3.2 Any proposal to commission any sort of vote on matters of public policy, political or industrial controversy or any 'controversial subjects' in any other area must be referred to Chief Adviser Politics.  
**See** 17.4.4
- 17.3.3 Any proposal to run a competition or vote jointly with a third party must be referred to Editorial Policy and the Interactivity Technical Advice and Contracts Unit (ITACU) well in advance.  
**See** 17.4.5

- 17.3.4 Any proposal to mount a UK Public Service or World Service competition or vote with a commercial organisation must be referred to the relevant Head of Department, Editorial Policy and ITACU well in advance. The BBC should normally pay a substantial part of the costs, and money from the outside organisation should not normally flow into any production budget without first seeking advice from Editorial Policy and Regulatory Legal.  
**See 17.4.6**
- 17.3.5 Any exceptions to the BBC being in direct control of systems and procedures when running a vote must be referred in advance to Editorial Policy and ITACU before any deal is entered into. They will advise whether the proposal is robust and meets BBC standards and/or on any additional measures that will need to be put in place.  
**See 17.4.7**
- 17.3.6 Any proposal to establish a BBC award must be referred to a senior editorial figure.  
**See 17.4.10**
- 17.3.7 Any proposal to take alternative finance funding for a UK BBC Public Service or World Service award must be referred in advance to Editorial Policy.  
**See 17.4.11**
- 17.3.8 Any proposal to offer a substantial prize must be referred to Editorial Policy.  
**See 17.4.15**
- 17.3.9 Any proposal to accept the donation of a substantial prize for a cross-BBC charity fundraising initiative must be referred to Editorial Policy.  
**See 17.4.20**
- 17.3.10 Giveaways where there is no test of skill must meet certain criteria and still require ITACU and Editorial Policy approval. Giveaways on Commercial Services must be approved by a senior editorial figure.  
**See 17.4.21**

- 17.3.11 Any UK Public Service or World Service competition, vote, award, or prize draw which involves audience interaction must be referred to the Interactivity Technical Advice and Contracts Unit (ITACU) and Editorial Policy.

For any BBC Studios-produced content, not commissioned by the UK Public Service, teams should refer to the Head of Editorial Standards/Compliance and Complaints for BBC Studios, who will consult ITACU or Editorial Policy as appropriate.

**See** 17.4.23

- 17.3.12 All proposals to use paid-for interactivity on UK Public Services and the World Service must be referred to the Interactivity Technical Advice and Contracts Unit (ITACU) and Editorial Policy.

**See** 17.4.26

- 17.3.13 Any use of paid-for interactivity on BBC Commercial Services must be referred in the first instance to a senior editorial figure who should consult Head of Editorial Standards/Compliance and Complaints, BBC Studios.

**See** 17.4.27

- 17.3.14 Any proposal to use premium rate services to raise money for charity through any form of audience interaction must be referred to Editorial Policy and the Interactivity Technical Advice and Contracts Unit (ITACU). Approval will also be required from a senior editorial figure.

**See** 17.4.28

- 17.3.15 Any proposal to use premium rate services aimed at children must be referred to Editorial Policy and the relevant director.

**See** 17.4.28

- 17.3.16 Any proposal to use text messaging for viewer, listener or online competitions or votes must be referred to Editorial Policy and the Interactivity Technical Advice and Contracts Unit (ITACU).

**See** 17.4.29

- 17.3.17 Any proposal to invite people to apply to be part of a programme by ringing a contestant line must be referred to the Interactivity Technical Advice and Contracts Unit (ITACU).

**See** 17.4.30

- 17.3.18 Any proposal to use a premium rate information line for events or performances being covered by BBC content, or to offer tickets for sale via such information lines must be referred to Editorial Policy.

**See** 17.4.31

- 17.3.19 Any proposal to offer a cash prize or a donated prize for a UK Public Service or World Service game show or quiz must be referred to, and approved by, the relevant output controller. Substantial cash prizes must be referred to the commissioning controller who must consult Editorial Policy.

**See** 17.4.43

- 17.3.20 Substantial cash prizes for Commercial Services content that is not a UK Public Service or World Service commission must be referred to Head of Editorial Standards/Compliance and Complaints, BBC Studios.

**See** 17.4.44

- 17.3.21 Any proposal to launch a talent search/talent show must also refer to the guidance on Talent Searches, and Editorial Policy must be consulted. If the proposal is not for the UK Public Services, BBC Studios Regulatory Affairs must also be consulted.

**See** 17.4.46

- 17.3.22 Any proposal for the BBC to accept a donated career or life-changing opportunity for contestants or participants must be referred to Editorial Policy.

**See** 17.4.48

- 17.3.23 Any proposal not to pre-moderate online spaces for under-18s must be referred to Editorial Policy.

**See** 17.4.56

- 17.3.24 Any online safeguarding concerns about under-18s, whether related to online grooming or child abuse images, must be referred to the BBC Safeguarding Team<sup>3</sup> immediately. Any images must not be shared.  
**See** 17.4.60
- 17.3.25 Users of all mobile networks should normally be able to take part in any UK Public Service or World Service mobile interactivity. Proposed exceptions must be referred to Editorial Policy.  
**See** 17.4.72
- 17.3.26 The BBC and production companies working with the BBC may enter into UK Public Service or World Service co-production arrangements with gaming companies in both technical and creative collaborations. Editorial Policy should be consulted. Regulatory Affairs and Public Policy may need to be consulted and all such arrangements must conform to the Statement of Policy on Use of Alternative Finance in BBC Content.  
**See** 17.4.81

## 17.4 Guidelines

### Competitions and Votes

- 17.4.1 All BBC competitions and votes must be honest, open and fair, meeting the editorial, ethical and technical standards that BBC audiences expect.
- 17.4.2 **BBC competitions and votes must be approved by a senior editorial figure.** Competitions and votes must meet the following criteria:
- technical systems must be robust

<sup>3</sup> [safeguarding@bbc.co.uk](mailto:safeguarding@bbc.co.uk), See Safeguarding Contact Us website: available on Gateway for BBC staff or via commissioning editors for independent producers, [www.bbc.com/safeguarding/](http://www.bbc.com/safeguarding/)

- competitions and votes entail complex requirements, which must be appropriately resourced
- contingency planning for both editorial and technical matters is essential
- appropriate measures must be taken to protect the integrity of a vote and the result
- rules for competitions and votes must be published
- the results must be reported with due accuracy to the audience
- it must be made clear to the audience when votes open and close and when the closing deadline is set for competition entries
- there must be sufficient time allowed between closing the competition or vote and announcing the result to ensure that it can be verified
- competitions and votes must be set up and run according to the relevant guidance
- on UK Public Services and the World Service competitions and votes must be editorially justified.

For additional considerations for competitions and votes for children see guidance.

See guidance: Audience Interactivity

## Competitions

17.4.3 All qualifying entries must have a fair chance of winning and the selection process must be designed to achieve this. The BBC should offer a genuine test of skill, knowledge or judgement appropriate to the audience:

- questions and answers must require an appropriate level of skill from the likely audience and be suitable in tone and subject matter. They must be duly accurate
- competitions using premium rate services must not be lotteries, which are defined in law. Legal advice must be taken

- the BBC may run prize draws for charity but all such proposals must be referred well in advance to ITACU and Editorial Policy  
**See** Prizes & Prize Draws below
- judging panels for viewer, listener, online and reader competitions must have clear criteria for selecting winners, which will be made available to audiences. Editorial Policy may be consulted
- UK Public Services and the World Service must not directly promote any competition which is not organised by or run in conjunction with them
- the BBC must retain editorial independence, and UK Public Service and World Service competitions must not unduly promote any service, product or publication
- costs to enter should be appropriately signposted
- people must not be required to buy anything to enter a UK Public Service or World Service competition unless it is linked to a cross-BBC charity fundraising initiative.

**See** 17.4.14–17.4.20

**See** Section 16 External Relationships, Including Commercial Relationships, and Financing: 16.4.29

## Votes

17.4.4 Consideration must be given at the outset to whether a public vote is the most editorially appropriate method of deciding a result. Votes can be used to provide entertainment, to raise money for cross-BBC charity fundraising initiatives or to help the audience register an opinion on topics ranging from light subjects to matters of public policy or politics. Consider carefully that in some cases the outcome of the vote may represent a life-changing opportunity for the winner or winning organisation, could be of interest to lobby groups, or could represent a potential commercial advantage.

- audiences must not be misled about the purpose of a vote
- running totals should not normally be announced before broadcasting the final verified outcome, as this could have the potential to affect it

- the BBC must be fair to anyone who is judged by an audience vote and must also fairly and accurately reflect the opinions of the voting audience
- voting/polling tools provided by social media platforms or other online services do not provide statistical or representative results. They should only be used to entertain or engage with audiences.

Any proposal to commission any sort of vote on matters of public policy, political or industrial controversy or any 'controversial subjects' in any other area must be referred to Chief Adviser Politics.

**See** Section 2 Impartiality: 2.4.31–2.4.32 and Section 10 Politics and Public Policy: 10.4.16–10.4.20

**See** guidance: Opinion Polls, Surveys, Questionnaires, Votes and Straw Polls

## Jointly Run Competitions and Votes

17.4.5 UK Public Service and World Service competitions and votes may be run jointly with an appropriate third party such as an academic or artistic institution and/or suitable commercial partner.

**See** Section 16 External Relationships, Including Commercial Relationships, and Financing: 16.4.1–16.4.10

Any proposal to run a competition or vote jointly with a third party must be referred to Editorial Policy and the Interactivity Technical Advice and Contracts Unit (ITACU) well in advance who will consider whether:

- the organisation the BBC is to work with is appropriate
- the competition or vote is robust and agreed contingencies are appropriate
- there is sufficient transparency of all key aspects if the vote or competition is being run editorially or technically by the third party
- the BBC will retain editorial control of its output.

- 17.4.6 Any proposal to mount a UK Public Service or World Service competition or vote with a commercial organisation must be referred to the relevant Head of Department, Editorial Policy and ITACU well in advance.

The BBC should normally pay a substantial part of the costs, and money from the outside organisation should not normally flow into any production budget without first seeking advice from Editorial Policy and Regulatory Legal.

- 17.4.7 The BBC must retain editorial control and have technical oversight and approval of an overall competition. When running a vote, the BBC must be satisfied with the systems and procedures in place and should usually be in direct control. Any exceptions to the BBC being in direct control of systems and procedures must be referred in advance to Editorial Policy and ITACU before any deal is entered into. They will advise whether the proposal is robust and meets BBC standards and/or on any additional measures that will need to be put in place.

## Awards

- 17.4.8 The BBC may establish its own awards to recognise the achievements and talents of members of the public or certain groups such as writers, musicians and sports stars. These awards may sometimes be run in conjunction with appropriate third parties.

**See** Section 16 External Relationships, Including Commercial Relationships, and Financing: 16.4.1–16.4.10

- 17.4.9 BBC awards carry the BBC brand and therefore give a stamp of approval for achievements of individuals or third-party organisations. They should only be set up to serve a serious purpose and must be appropriately organised and resourced.

BBC awards must be set up and run according to the relevant guidance.

**See** guidance: Audience Interactivity

17.4.10 Any proposal to establish a BBC award must be referred to a senior editorial figure. Awards must meet the following criteria:

- the subject matter of BBC awards should be appropriate and should not compromise the BBC's impartiality, editorial integrity or independence
- there must be clear terms, conditions and criteria for both the nominees and the judges.
- UK Public Service awards given at a BBC event may be supported by a non-commercial sponsor.

See Section 16 External Relationships, Including Commercial Relationships, and Financing: 16.4.1–16.4.13

17.4.11 Funding arrangements for UK Public Service and World Service awards must conform to the Statement of Policy on Use of Alternative Finance in BBC Content<sup>4</sup>, and the guidance on Sponsorship of BBC On-Air or Online Events Broadcast on BBC Public Services. Any proposal to take alternative finance funding for a UK Public Service or World Service award must be referred in advance to Editorial Policy.

See guidance: Sponsorship of BBC On-Air or Online Events Broadcast on BBC Public Services

## Content that is Pre-Recorded, Available on Catch-Up Services or Repeated

17.4.12 When live (or as-live) programmes containing competitions, votes or other interactivity are repeated, time-shifted or distributed via catch-up services, the audience must be informed that the interactivity is no longer available.

<sup>4</sup> Statement of Policy on Use of Alternative Finance in BBC Content (Clause 49 (4) of the BBC Framework Agreement 2016)

- 17.4.13 Programmes containing a vote or competition that is in breach of the BBC's editorial standards must be re-edited so the audience is not misled.

**See** guidance: Removal of BBC Online Content

## **Prizes, Prize Draws, Giveaways, Auctions and Ticket Ballots**

- 17.4.14 Prizes must be described accurately. They should meet the expectations of the likely audience and must not bring the BBC into disrepute.

References to prizes and their donors must avoid undue prominence. UK Public Service and World Service competitions should not normally refer to branded goods or services which are offered as prizes.

**See** Section 15 Independence from Commercial and Other External Interests: 15.4.1–15.4.9)

- 17.4.15 The BBC should normally pay for prizes offered in UK Public Service and World Service viewer, listener and online competitions and aim to offer original, rather than expensive prizes. Any proposal to offer a substantial prize must be referred to Editorial Policy who will consider whether it is appropriate in the particular circumstances.

Cash prizes are not normally offered for UK Public Service viewer, listener or online competitions.

**See** 17.4.43

- 17.4.16 Prizes for children should be appropriate to the age of the target audience and the entrants, and should normally be modest, unique or rely on 'money can't buy' experiences.

- 17.4.17 Cash prizes must not be offered for any children's game show, quiz or competition.

**See** 17.4.42–17.4.45

- 17.4.18 On UK Public Services and the World Service, references to prizes should not give the impression of being promotional. Prizes featuring BBC or BBC-licensed commercial products must not give the impression of promotion of Commercial Services.

See Section 15 Independence from Commercial and Other External Interests: 15.4.25

### **Donated Prizes for UK Public Service and World Service Competitions**

- 17.4.19 Donated prizes for a UK Public Service or World Service viewer, listener or online competition must conform to the Statement of Policy on Use of Alternative Finance in BBC content<sup>5</sup>.

Donated prizes should usually have a modest monetary value. They could include an opportunity, such as a backstage tour.

The following criteria apply:

- cash prizes must not be accepted
- over time, there should be a wide range of donors
- donated prizes must be appropriately signposted to ensure transparency but should not be unduly prominent.

There must be no references to donated prizes in, or immediately adjacent to, news bulletins.

<sup>5</sup> Statement of Policy on Use of Alternative Finance in BBC Content (Clause 49 (4) of the BBC Framework Agreement 2016)

## Prizes for Cross-BBC Charity Fundraising Initiative Competitions and Auctions

- 17.4.20 It may be possible to offer or accept the donation of a substantial prize for a cross-BBC charity fundraising initiative competition, prize draw or auction. Any proposal to accept the donation of a substantial prize for a cross-BBC charity fundraising initiative must be referred to Editorial Policy who will consider whether the prize is appropriate in the particular circumstances.

### Giveaway

- 17.4.21 A giveaway is a simple and effective way of engaging the audience in events that the BBC mounts or covers, or which may be taking place in the local area. It is, in effect, a free prize draw where items (usually tickets) are offered as prizes. It differs from a competition as there is no test of skill or knowledge. Winners are chosen at random from the total pool of entrants.

Prizes must be of relatively low value, be generally available (ie not 'money can't buy' or high-end experiences with a high face value) and should not be of excessive current demand or popularity.

Giveaways where there is no test of skill must meet certain criteria and still require ITACU and Editorial Policy approval. Giveaways on Commercial Services must be approved by a senior editorial figure.

### Ticket Ballots

- 17.4.22 Ticket ballots can be used to select audiences for BBC and BBC joint events and studio shows. They may be run by the BBC or via a third party that manages the ballot on the BBC's behalf. The BBC may also partner with other suitable organisations to run a joint ballot for an event it is covering. More detailed advice is available from Editorial Policy.

## The Interactivity Technical Advice and Contracts Unit (ITACU)

17.4.23 The Interactivity Technical Advice and Contracts Unit (ITACU) is a specialist BBC unit which provides advice on all technical aspects of running a competition, giveaway, vote or award, and auctions, charity donations ballots or prize draws on any platform and in particular in the use of premium rate telephony.

ITACU contracts telephone service providers and verifies those providers' processes. The unit also provides legal advice and terms and conditions for competitions and votes. ITACU does not offer editorial or editorial policy advice, but it liaises closely with Editorial Policy.

Any Public Service or World Service competition, vote, award, or prize draw which involves audience interaction must be referred to the Interactivity Technical Advice and Contracts Unit (ITACU) and Editorial Policy.

For any BBC Studios-produced content, not commissioned by the UK Public Service, teams should refer to the Head of Editorial Standards/Compliance and Complaints for BBC Studios, who will consult ITACU or Editorial Policy as appropriate.

## Telephony Services

17.4.24 Any proposal to run a competition, vote or award using telephony services must also follow the mandatory approvals process set out in the guidance on interactivity.

**See** guidance: Audience Interactivity

## Paid-for Interactivity

- 17.4.25 Paid-for interactivity occurs when some or all of charges paid by the audience accrue to the broadcaster. It may be via a premium rate telephone service, a mobile device or app or some other technology.

BBC content must comply with the code of practice issued by the industry regulator, Phone-paid Services Authority (PSA).

The cost to the audience for using non-geographic telephony services must be made clear and broadcast as appropriate.

Non-geographic telephony services are those telephone numbers that are not linked to a specific location.

- 17.4.26 All proposals to use paid-for interactivity on UK Public Services and the World Service must be referred to the Interactivity Technical Advice and Contracts Unit (ITACU) and Editorial Policy who will consider whether it is appropriate for the particular circumstances.
- 17.4.27 Any use of paid-for interactivity on BBC Commercial Services must be referred in the first instance to a senior editorial figure who should consult Head of Editorial Standards/Compliance and Complaints, BBC Studios.

## Premium Rate Services on Public Service Broadcast Channels

- 17.4.28 Premium rate services are services for which the revenue is shared between relevant parties. They are regulated by the Phone-paid Services Authority.

On UK Public Services and the World Service, premium rate services are normally used when they are the safest and most suitable way to handle large volumes of calls effectively.

Premium rate services must meet the following criteria:

- the lowest viable tariff must be charged
- technical systems must prevent callers from being charged should they try to use the system when the lines are not open
- they must not be used with the aim of making a profit except to raise money for a cross-BBC charity fundraising initiative where this has been approved.

There is a mandatory approvals process for the use of premium rate services within UK Public Services and the World Service and there are also separate legal and regulatory constraints.

Any proposal to use premium rate services to raise money for charity through any form of audience interaction must be referred to Editorial Policy and the Interactivity Technical Advice and Contracts Unit (ITACU) who will consider whether the proposal is appropriate to the particular circumstances. Approval will also be required from a senior editorial figure.

Any proposal to use premium rate services aimed at children must be referred to Editorial Policy and the relevant director. If such services are to be used, then children must be prompted to seek permission to call from the bill payer.

See guidance: Audience Interactivity

## Text Messaging (SMS)

17.4.29 There are technical issues involved in the use of SMS that can jeopardise editorial integrity.

Any proposal to use text messaging for viewer, listener or online competitions or votes must be referred to Editorial Policy and the Interactivity Technical Advice and Contracts Unit (ITACU) who will consider whether the proposal is robust enough in the particular circumstances.

There must be enough time allowed for receipt, collation and examination of texts as there can be delays in this form of interaction.

## Contestant Lines

- 17.4.30 In some cases it may be appropriate to invite people to apply to be part of a programme/BBC content by ringing a contestant line. Any proposal to invite people to apply to be part of a programme by ringing a contestant line must be referred to the Interactivity Technical Advice and Contracts Unit (ITACU).

## Event Information Lines on UK Public Services and the World Service

- 17.4.31 The BBC may trail on air phone lines which provide information about events or performances being covered by BBC content. These lines should not normally be premium rate or a means of purchasing tickets, though they may give details of telephone sales numbers. Any proposal to use a premium rate information line for events or performances being covered by BBC content, or to offer tickets for sale via such information lines must be referred to Editorial Policy who will consider whether the proposal is appropriate in the particular circumstances.

## Automated Information Services

- 17.4.32 Recorded 'dial and listen' information services should be directly relevant to the output.

**See** Section 15 Independence from Commercial and Other External Interests: 15.4.28

- 17.4.33 The duration of calls should be kept to a minimum and the audience should be informed of the cost. The service must not be used to promote any product, retailer or supplier.

**See** Section 15 Independence from Commercial and Other External Interests: 15.4.28

## Game Shows and Quizzes

- 17.4.34 BBC-commissioned game shows and quizzes must be conducted with integrity. On UK Public Services and the World Service, BBC content producers must take care not to appear unduly commercial or promotional in relation to brand references in questions and references to commercial products as prizes.

### Selection of Contestants for Game Shows and Quizzes

- 17.4.35 Contestants on game shows and quizzes are contributors so these provisions are in addition to the Editorial Guidelines on contributors and consent.

**See** Section 6 Fairness: 6.4.1–6.4.11

Contestants taking part in BBC Public Service content will be subject to public scrutiny. Therefore, the choice of contestant must not bring the BBC or the contestants themselves into disrepute. Reasonable steps should be taken to screen out contestants who are unsuitable and to make reasonable adjustment to ensure inclusion where possible.

- 17.4.36 Appropriate measures should be put in place to assess whether it is in the best interests of potential contestants to take part in a broadcast gameshow. Consideration should be given to whether a psychological assessment should be used.
- 17.4.37 The duty of care shown by productions to their contributors is extremely important and commissions should ensure that appropriate duty of care, and aftercare provisions and staffing, are included.

## **Fairness to Contestants in Game Shows and Quizzes**

- 17.4.38 Members of the public who take part in game shows and quizzes must be treated honestly, fairly and with regard for their dignity. They must be made aware of the rules and should normally be given information about what is likely to happen to them and what is expected of them. If they are to appear in a humorous way it is important that they feel part of the joke rather than ridiculed. Care needs to be taken where contestants have been volunteered by family or friends and colleagues.

**See** Section 5 Harm and Offence: 5.4.32, Section 6 Fairness: 6.4.1–6.4.5 and 6.4.23 and Section 7 Privacy: 7.4.25–7.4.28

## **Safety of Contestants in Game Shows and Quizzes**

- 17.4.39 The BBC must not put the health or safety of contestants or any other participants at any significant risk. Participants must not be asked to do anything which involves danger to life. Where relevant, specialist advice should be sought.

To avoid imitative behaviour or allegations of irresponsibility, it may be useful to make clear in the output when suitable safety precautions have been taken.

**See** Section 5 Harm and Offence: 5.4.49 and Section 6 Fairness: 6.4.22–6.4.26

## **Setting Questions for Game Shows and Quizzes**

- 17.4.40 Questions and their answers should be accurate, legal, require a reasonable level of skill, and be appropriate in subject matter and tone for audience expectations.

## Rules or Terms and Conditions for Game Shows and Quizzes

- 17.4.41 There must be rules for quizzes or game shows, setting out what is expected of contestants and the terms of their participation.

Contestants should be clearly informed of these rules before they take part and should confirm that they accept and understand the terms of their participation.

## Prizes for Game Shows and Quizzes

- 17.4.42 Prizes must be described with due accuracy. Donated prizes for game shows or quizzes are not normally accepted, except for cross-BBC charity fundraising initiatives.

- 17.4.43 Any proposal to offer a cash prize or a donated prize for a UK Public Service game show or quiz must be referred to, and approved by, the relevant output controller. Substantial cash prizes must be referred to the commissioning controller who must consult Editorial Policy who will consider whether:

- the proposal conforms to the Statement of Policy on Use of Alternative Finance in BBC Content<sup>6</sup>
- the prize is appropriate in the particular circumstances
- suitable levels of skill have been demonstrated.

- 17.4.44 Substantial cash prizes for Commercial Services content that is not a UK Public Service or World Service commission must be referred to Head of Editorial Standards/Compliance and Complaints, BBC Studios.

<sup>6</sup> Statement of Policy on Use of Alternative Finance in BBC Content (Clause 49 (4) of the BBC Framework Agreement 2016)

- 17.4.45 Where children are contestants in gameshows or quizzes, care must be taken to ensure the format, tone, style, questions and prizes are appropriate to the age range of the children taking part.

## **Talent Searches and BBC Content Offering Life-Changing Opportunities**

- 17.4.46 Talent searches/talent shows are different from viewer, listener or online user competitions. They require contestants to have a specific skill or talent and contestants are cast and/or chosen via an audition process. They often require contestants to be part of an immersive process which may last several weeks.

Any proposal to launch a talent search/talent show must also refer to the guidance on Talent Searches, and Editorial Policy must be consulted. If the proposal is not for the UK Public Services, BBC Studios Regulatory Affairs must also be consulted.

See guidance: Talent Searches and Contestants

- 17.4.47 The BBC may enter into editorially justified agreements with an appropriate third party to offer winning contestants or participants an opportunity or chance of a lifetime that the BBC alone could not deliver. For example, a third party may be able to offer a specialist career opportunity, an investment in a start-up business, a chance to showcase a skill, a contract in a gaming organisation, or a performance-based opportunity such as a concert or recording contract or an appearance in a professional production on stage or film.

See Section 16 External Relationships, Including Commercial Relationships, and Financing: 16.4.1–16.4.4

The BBC must maintain editorial control.

- 17.4.48 Any proposal for the BBC to accept a donated career or life-changing opportunity for contestants or participants must be referred to Editorial Policy who will consider whether:

- the proposal conforms to the Statement of Policy on Use of Alternative Finance in BBC content<sup>7</sup>
- the proposal is appropriate in the particular circumstances.

## **Talent Search Selection of Contestants/Participants**

See Section 6 Fairness: 6.4.1–6.4.5

17.4.49 Talent search contestants and participants in BBC Public Service commissioned content offering life-changing opportunities are contributors, so these provisions are in addition to the Editorial Guidelines on contributors and consent.

It is fundamental to inclusion and fairness to ensure that the BBC and productions it commissions have explored fully how to make all reasonable adjustments to enable the inclusion of the widest range of participants possible.

Contestants/participants may often need to have specialist skills and may be recruited from a variety of sources. Often such contestants may appear on air for many weeks and receive considerable exposure. Duty of care measures and processes are extremely important and must be established at the outset.

17.4.50 The background of prospective contestants/participants must be checked before final selection is made, to ensure suitability to appear in BBC content. The BBC operates from a principle of inclusion, where appropriate and possible, rather than exclusion. Factors such as an ability to withstand the pressure of a competitive and sometimes live broadcast format must be considered, as well as previous criminal convictions or other matters which could bring the BBC and themselves into disrepute.

<sup>7</sup> Statement of Policy on Use of Alternative Finance in BBC Content (Clause 49 (4) of the BBC Framework Agreement 2016)

## Care of Contestants/Participants

- 17.4.51 At the outset, contestants/participants may not appreciate the life-changing impact of appearing in BBC content of this nature. Processes should be put in place to ensure they are appropriately briefed, prepared and supported—including, but not limited to, suitable support if the series is likely to attract considerable press and marketing attention. Additional processes are required for contestants/participants who are under 18, particularly if the output is to be broadcast live.

Aftercare is extremely important. Appropriate provisions should be in place at the point of commission.

## Fairness to Contestants/Participants

- 17.4.52 All contestants/participants must be treated honestly, fairly and with regard for their dignity. Appropriate steps should be taken to ensure they understand and appreciate the criteria which will be used to judge them.

Contestants/participants should be given copies of the specific terms and conditions governing their participation and where relevant the code of conduct for the production. The penalties for cheating and/or breaching the code of conduct must be clearly outlined, especially when a show involves an audience vote.

**See** Section 6 Fairness: 6.4.1–6.4.5

**See** guidance: Talent Searches and Contestants

## Phone-ins

- 17.4.53 Phone-in programmes play an important part in BBC output and enable BBC content to connect directly with audiences. They may use comments sent via social media, text and email as well as talking to callers directly.

Because phone-ins are live, everyone working on the output should be ready to deal with the unexpected. Contributors may become upset or themselves cause distress, offence, or advocate breaking the law. Phone-ins should not become a vehicle for the opinions of the presenter.

**See** Section 2 Impartiality: 2.1

The following may help to minimise risks while enabling audiences to express their views and ensuring that the BBC remains as accessible as possible:

- contributors to phone-ins should normally be called back and if necessary briefed before they go on air. This should establish whether or not it is appropriate to go ahead
- in cases of doubt the contribution should be pre-recorded and appropriate referral made
- producers and presenters must have contingency plans to deal with unexpected issues including potential breaches of the Editorial Guidelines or the law
- when producing a phone-in on a difficult or sensitive subject, the production team should be briefed on how to deal appropriately with contributors, including children and young people and vulnerable callers. Information about support services for contributors may be required
- a breadth and diversity of views should be sought, and the requirements of due impartiality should be met
- the BBC should ensure that audiences can access phone-ins and make reasonable adjustments to ensure that they can contribute

**See** Section 2 Impartiality: 2.1

- if a programme has not attracted any callers or contributions then it should seek alternative content. Under no circumstance should programmes make up callers, or other interactions such as social media messages, emails and texts. The BBC and those who work with it must be honest with audiences at all times.

**See** Section 9 Children and Young People as Contributors: 9.4.1–9.4.11

- 17.4.54 When a programme is contacted unexpectedly by someone wishing to share a difficult or sensitive story, teams should consider whether it is appropriate to carry it. They should also reflect whether it is appropriate to air it immediately or whether a delay would provide time for further preparation and to deal appropriately with the contributor concerned.

## Comment and Moderation

- 17.4.55 Every online space on BBC platforms that includes comment should be appropriately moderated. For message boards for over-18s, comments should normally be reactively moderated unless the sensitivity of the subject requires a more active form of moderation.
- 17.4.56 Online spaces directed to under-18s should be pre-moderated. Any proposal not to pre-moderate online spaces for under-18s must be referred to Editorial Policy who will consider whether the proposed form of moderation would offer an appropriate level of child protection. BBC content should not link to unmoderated spaces for an audience of under-18s.
- 17.4.57 Responsibility for ensuring the message board maintains appropriate overall standards of moderation lies with the senior editorial figure responsible for the associated content.

Additional measures may be necessary at times of special sensitivity, such as during armed conflict or elections.

See Section 12 War, Terror and Extreme Violence, Disaster and Disorder: 12.4.6

- 17.4.58 Online spaces which publish pictures or video or other digital content from members of the public are usually pre-moderated.
- 17.4.59 Every online space must be able to implement a swift, robust and appropriate escalation strategy if, for example, illegal or harmful material is posted or if illegal conduct is suspected.

Escalation strategies should also be in place for suspected child grooming, threat to life, serious sexual assault or to avoid serious harm.

- 17.4.60 Any online safeguarding concerns about under-18s, whether related to online grooming or child abuse images must be referred to the BBC Safeguarding Team<sup>8</sup> immediately. Any images must not be shared. The Safeguarding or Corporate Investigations<sup>9</sup> Team will advise further once the referral has been made.

See guidance: Interacting with Children and Young People Online

- 17.4.61 Every interactive space should publish easily accessible house rules that govern what content is acceptable and what will normally be removed.

There should also be an easily accessible reporting function to alert the BBC to breaches of those rules.

- 17.4.62 The BBC and those working with it should aim to accommodate the widest possible range of opinions consistent with the house rules and the law. BBC content should also include, where it is offered, comment that is critical of the BBC, its presenters, programmes or policies.

- 17.4.63 Care must be taken to mitigate risk around content, contact and conduct when running message boards directed to children.

See Section 9 Children and Young People as Contributors: 9.4.27

See guidance: Interacting with Children and Young People Online

## Social Media and Other Third-Party Platforms

- 17.4.64 BBC-branded activity and content on social media platforms and other third-party sites should reflect the same values and expectations of the BBC's own platforms, subject to the specific constraints and audience experience of each platform.

<sup>8</sup> safeguarding@bbc.co.uk, See Safeguarding Contact Us site: available on Gateway for BBC staff or via commissioning editors for independent producers, [www.bbc.com/safeguarding/](http://www.bbc.com/safeguarding/)

<sup>9</sup> See Corporate Investigations site: available on Gateway for BBC staff or via commissioning editors for independent producers

- 17.4.65 The choice of third-party sites must not bring the BBC into disrepute or pose significant risks to children and young people and vulnerable contributors or those at risk of vulnerability.

Teams should be mindful of the BBC's legal and contractual responsibilities in operating on these sites and the expectations of other users towards BBC activity and behaviour on these sites.

Any intervention should normally be light touch, but it may be reasonable to remove material that could cause unjustifiable offence.

**See** Section 13 Use of BBC Content After Publication or Broadcast: 13.4.29

- 17.4.66 A clear distinction must be maintained between BBC spaces which are run by the BBC for BBC purposes and personal spaces which are run by staff or BBC presenters for their personal purposes.

There should be editorial oversight and responsibility for all activity in BBC spaces.

**See** guidance: Social Media BBC Programme, Brand and Genre Accounts

## Comments on Live Streams

- 17.4.67 Live streaming provides the opportunity to interact directly with audiences in real time on BBC services. Appropriate steps should be taken to manage comments during the live stream and for a period after the event has finished, in line with the platform, its functionality, and the likely audience.

**See** Section 7 Privacy: 7.4.37–7.4.41, Section 15 Independence from Commercial and Other External Interests: 15.4.8 and Section 16 External Relationships, Including Commercial Relationships, and Financing: 16.4.20–16.4.21

## User-Generated Content

17.4.68 User-generated content can take the form of video or still pictures or other digital content in addition to text and comment. It can be sourced either by a direct call to action to audiences or be found through searches across the web.

Whenever using user-generated content in BBC output, consideration should be given to the following:

- the authenticity of the content and the context in which it is to be used, to ensure due accuracy
- consent—both to use the content and, where relevant, from those who feature in it, particularly where this includes under-18s or anyone who may be considered vulnerable  
*See guidance: Interacting with Children and Young People Online*
- the legitimate expectation of privacy of anyone who appears in it, for example if they are receiving medical treatment, or if the intention of the original publication on social media was for it to be shared among a limited number of followers such as via a WhatsApp group and other closed or restricted spaces
- whether the BBC is encouraging breaking the law or putting contributors at risk by commissioning or using content where personal safety could be endangered
- any legal or copyright issues
- providing an online or onscreen credit to the owner of the picture or video.

17.4.69 Where the BBC embeds third-party content on its own platforms care should be taken to ensure that associated content that might be accessible to audiences is appropriate.

17.4.70 Content producers should also be aware of risks of advertising or commercial references appearing on embedded third-party material and remove them if necessary.

- 17.4.71 References to products, such as social media platforms, can only be made if editorially justified and not unduly prominent.

**See** Section 15 Independence from Commercial and Other External Interests: 15.4.3–15.4.4

**See** guidance: User-Generated Contributions

## Mobile Content, including Apps

Apps are software applications for audience participation in content. Most are computer programmes designed to enable users to access the web. Some apps are not designed to access the web—particularly those aimed at children. They are generally associated with mobile devices like phones and tablets.

**See** 17.1

- 17.4.72 Users of all mobile networks should normally be able to take part in any UK Public Service or World Service mobile interactivity. Proposed exceptions must be referred to Editorial Policy who will consider whether it is justified to exclude some networks.
- 17.4.73 The cost to the audience of Public Service mobile interactivity should be kept to the lowest tariff possible, except for approved cross-BBC charity fundraising initiatives.
- 17.4.74 When inviting people to interact with BBC content, appropriate cost information and, where relevant, content information should be included with mobile content. Audiences should normally be warned that data charges may apply.
- 17.4.75 Content distributed via mobile devices should be suitable for, and meet the expectations of, the likely audience. When editing its content for mobile the BBC should ensure that the suitability and integrity of the original content is not affected. Producers should take account of the original context and avoid misrepresentation.

**See** Section 13 Use of BBC Content After Publication or Broadcast: 13.4.1–13.4.9

- 17.4.76 UK Public Services and the World Service may include references to free apps connected to content, which are likely to be considered as programme-related material.

**See** Section 15 Independence from Commercial and Other External Interests: 15.4.22

However, where an app is paid for, or where the app is free but enables payment to be taken, the guidelines for premium rate telephony apply.

**See** 17.4.28

## Games and Gaming

- 17.4.77 The use of play-along games on mobile devices, online/digital and interactive television, as well as play-along content that can be delivered via apps and a range of platforms, can reach new audiences and enhance output. The cost of accessing them on UK Public Services and the World Service should be kept to a minimum. The games must not be designed to make a profit on UK Public Services and the World Service.

- 17.4.78 When featuring gaming, BBC content should aim to reflect a range of games, gaming platforms or gaming consoles and avoid undue and/or cumulative prominence. The gaming content must be suitable for the likely audience. Appropriate safeguarding measures must be considered if proposals include introducing audiences to immersive and interactive third-party communities.

- 17.4.79 The use of immersive technology enables the BBC to enhance the experiences of content and bring audiences closer to the action. These may include:

- Augmented Reality (AR) is a real-world environment which has been enhanced by overlaying computer-generated special effect (visual, sounds and others). A user may have a more immersive experience. It does not require a headset and can be accessed via a smartphone

- Virtual Reality (VR) is a computer-generated, virtual, immersive environment, in which scenes, objects, and characters appear to be real. They are designed to give the user the illusion that they are immersed in the surroundings. Users can access this environment via a Virtual Reality headset or helmet
- Artificial Intelligence (AI) is a machine-based system that can perform tasks commonly associated with human intelligence
- Generative AI is a type of artificial intelligence capable of creating text, images, speech, music, video and code in response to prompts from a user.

17.4.80 When using AR and VR technology and effects, consideration should be given to the following:

- the impact of heightened reality and immersion on the audience member. This is a different experience from other content and requires careful thought about possible enhanced risks of harm and offence and shock
- there may be safety considerations about the use of surround auditory technology especially if content (such as a podcast) is designed to be consumed whilst on the move
- audiences may interact with each other without knowing exactly who they are communicating with; for example, catfishing if used in a dating context
- the ability of the audience to change the narrative in a variety of genres and how this is managed so the BBC does not lose overall editorial control.

- 17.4.81 The BBC and production companies working with the BBC may enter into UK Public Service or World Service co-production arrangements with gaming companies in both technical and creative collaborations. Editorial Policy should be consulted. Regulatory Affairs and Public Policy may need to be consulted and all such arrangements must conform to the Statement of Policy on Use of Alternative Finance in BBC Content<sup>10</sup>.

## **Interactive Services including Virtual Reality, Red Button, Augmented Reality and Artificial Intelligence**

- 17.4.82 Interactive services broadcast on UK Public Service or World Service television, such as BBC iPlayer and BBC Sounds and those activated by the red button, should not promote any specific platform. They must be appropriate for the audience of any associated television programme.

**See** Section 5 Harm and Offence: 5.4.1–5.4.3

- 17.4.83 It should be made clear to audiences where payment is required and the total cost displayed where practical. Interactive TV services on UK Public Service or World Service channels should not be designed to make a profit.

<sup>10</sup> Statement of Policy on Use of Alternative Finance in BBC Content (Clause 49 (4) of the BBC Framework Agreement 2016)

