

Conflicts of Interest

15

15.1 *(p.270)*

Introduction

15.2 *(p.272)*

Mandatory Referrals

15.3 (p.275)

Guidelines

- Declaration of Personal Interests
- Risks of Conflicts of Interest
- External Activities
- Public Expressions of Opinion
- Political Activities
- Charities and Campaign Work
- Writing Commitments
- Public Speaking and Other Public Appearances
- Academic Roles
- Media Training
- Personal Benefits
- On-Air Talent and Promotional Activity Including Commercial Advertising and Endorsements
- References to BBC Content in Advertisements
- Regular Contributors to Output
- Actors and Artists Replicating Their BBC Roles in Other Output
- Talent and Agent-Owned Independent Production Companies

15.1 Introduction

Our audiences must be able to trust the BBC and be confident that our editorial decisions are not influenced by outside interests, including political or commercial pressures. This section explains how an individual's activities might affect the public's perception of the BBC.

A potential conflict of interest arises when there is the possibility that an individual's external activities or interests may affect, or be reasonably perceived as affecting, the BBC's impartiality and its integrity, or risk damaging the BBC's reputation generally or the value of the BBC brand. Conflicts of interest may occur in any area of our work.

It is a requirement that all BBC staff must formally declare any personal interest which may affect their work with the BBC. This requirement extends to freelance presenters, reporters, producers and researchers and other workers. The onus to declare personal interests rests with the individual. Each department also has a responsibility for identifying its areas of vulnerability. There may be particular sensitivities around on-air talent.

Individual BBC managers must decide what action is needed in response to declared potential conflicts of interest. There may be times where individual freedoms may need to be constrained or where individuals may be restricted in the areas in which they can work or in certain aspects of their roles. These decisions will depend on the kind of output they are involved in, their role, how senior they are and on the nature of their personal interests and external activities.

Conflicts of interest are not regulated by Ofcom, except where they may lead to a failure of due impartiality¹. The BBC's policy on personal interests

¹ The Ofcom Broadcasting Code, Rule 5.8: Any personal interest of a reporter or presenter, which would call into question the due impartiality of the programme, must be made clear to the audience

forms part of the contract of employment that applies to BBC employees. Failure to comply with these Guidelines or to follow the related Guidance may be a matter for BBC Human Resources. For individuals who are otherwise engaged by the BBC – including freelance presenters, reporters, producers, researchers and other on-air talent – failure to comply with these Guidelines and related Guidance would normally be a contractual matter.

The principles on conflicts of interest apply to everyone, but the application of the principles varies according to an individual's role and their level of involvement with BBC content. This reflects audience expectations of the impartiality and integrity of BBC output, in particular its news and current affairs.

There are additional legal and regulatory constraints on those involved in financial journalism or those who are involved in output offering financial or consumer advice.

An individual's political, commercial, financial or other interests must not influence, or be reasonably perceived as having influenced, BBC editorial judgements.

Those involved in commissioning, production, marketing, or who have any other role in the creation of BBC content, must have no material connection with products, businesses or other organisations featured in that content.

The involvement of talent, or their agents, in the ownership or senior management of independent production companies making output for the BBC risks damaging the public perception of the BBC's impartiality, independence and integrity. The BBC must maintain overall editorial control of all aspects of the content.

These Guidelines are not intended to prevent the BBC from using staff, freelancers and presenters with expertise or specialisms in particular areas. Nor is anything in these Guidelines intended to prevent elected officials of the BBC's recognised trade unions carrying out legitimate activities on behalf of their union.

Detailed guidance on Conflicts of Interest is available on the Editorial Guidelines website. This also includes advice for financial journalists.

15.2 Mandatory Referrals

(Mandatory Referrals are part of the BBC's editorial management system. They are an essential part of the process to ensure compliance and must be observed.)

Referrals to Director Editorial Policy and Standards

15.2.1 News and current affairs presenters should not front campaigns for charities or campaigning bodies as this could compromise the BBC's reputation for impartiality. Any proposal that would not comply with this must be referred to Director Editorial Policy and Standards.

See 15.3.25

15.2.2 There may be circumstances where it is not possible to produce a programme about specific talent unless it is produced by an independent production company owned by, or as a co-production with, that talent or an associated agency. In such cases, proposals can only be considered if there is strong editorial justification. The matter must be referred to the relevant divisional director and Editorial Policy; Director Editorial Policy and Standards must also be consulted.

See 15.3.44

Other Referrals

- 15.2.3** Where an individual considers a potential conflict has arisen that they have not already declared, they must inform the relevant editorial manager promptly. Editorial Policy may also be consulted.
See 15.3.4
- 15.2.4** In some areas, such as specialist music or science programming, on-air talent and production staff may have commercial, professional and external personal interests in their area of expertise. In such cases, the relevant division should ensure that appropriate editorial procedures are in place so that there is no conflict of interest with their on-air role. Such procedures must be referred to Editorial Policy.
See 15.3.8
- 15.2.5** Chief Adviser Politics must be consulted at the outset if there is any possibility of political activity being perceived as a risk to BBC impartiality.
See 15.3.20
- 15.2.6** Where any individual undertaking work for the BBC intends to stand as a candidate in a national or local election – including seeking nomination as a party candidate – this must be referred to Chief Adviser Politics at the outset.
See 15.3.21
- 15.2.7** Any proposal by individuals to work for, or be publicly associated with, charities and campaigning groups must be referred to the head of department, who must consult Editorial Policy.
See 15.3.24

15.2.8 Individuals involved in the production or presentation of news and current affairs output – including freelances primarily known as BBC news presenters or reporters – must refer proposals to write columns or blog posts for external publications to a senior level in the relevant division.

See 15.3.27

15.2.9 Individuals involved in the production or presentation of editorial output for the BBC must obtain permission from line managers before agreeing to provide media training. Freelance presenters must disclose their training work where it may be a conflict of interest with their work for the BBC.

See 15.3.31

15.2.10 Individuals must not accept personal benefits, or benefits for their family or close personal relations, from organisations or people with whom they might have dealings on the BBC's behalf. Unacceptable personal benefits include goods, discounts, services, cash, loans, gratuities or entertainment outside the normal scope of business hospitality.

Any exception to this, where it could affect production of content for the BBC, must be referred to the relevant head of department, who should normally consult Editorial Policy, to establish whether accepting the offer constitutes a conflict of interest.

See 15.3.33

15.2.11 Presenters of BBC factual output who wish to recreate their roles in fictional output risk confusing audiences and undermining the credibility of their own output as well as damaging their own reputations. Any proposal to do so must be referred to their head of department.

See 15.3.43

15.2.12

Current presenters of BBC news output should not appear as news presenters in a fictional bulletin if there is a reasonable possibility that this could confuse or mislead audiences. Any proposal to do so, for example in a comic, unrealistic or fantasy situation, must be referred to their head of department.

See 15.3.43

15.3 Guidelines

Declaration of Personal Interests

15.3.1

All individuals engaged by the BBC are required to declare any personal interests which may affect their work with the BBC. These should be set out on a Declaration of Personal Interest form and it is the responsibility of individuals to ensure it is maintained and is up to date.

Most freelances are also asked to declare any commercial interests which may impinge on their work with the BBC. Independent producers should make a declaration at the time of commissioning.

External interests – both commercial and non-commercial – of presenters and other on-air talent could lead to a conflict of interest. When contracts are negotiated, talent must declare any commercial or other external interests that may have a bearing on their on-air role or which are connected with the subject matter of the programme they present.

Significant financial interests should be declared by all production and editorial staff working for the BBC if they are in any way connected with the area in which they work or the subject matter they cover.

The area of greatest sensitivity is financial journalism where additional legal requirements apply in terms of what must be declared.

See Guidance online: Conflicts of Interest

- 15.3.2** The onus is on individuals to inform their managers about any outside interests they (or, in some circumstances, their family or close personal contacts) have, so that the BBC can decide what action is needed in response to any perceived conflict of interests.
- 15.3.3** Some non-political voluntary public roles, such as school governor or magistrate, are normally acceptable even for those involved in editorial decision-making, including in news and current affairs output. These roles should be declared.
- 15.3.4** **Where an individual considers a potential conflict has arisen that they have not already declared, they must inform the relevant editorial manager promptly. Editorial Policy may also be consulted.**

Risks of Conflicts of Interest

- 15.3.5** There are four principal areas of risk that may arise from an individual's external interests and activities. These risks exist across all output areas.
- the risk of bringing the BBC into disrepute
 - the risk of bringing the BBC's impartiality into doubt
 - the risk of bringing the BBC's independence into doubt
 - the risk of an individual's commercial interests, promotional work, external activities and other interests compromising the BBC's integrity.
- 15.3.6** **All output areas**
- The external activities of programme makers, content producers and on-air talent must not risk damaging the BBC's reputation. An individual's off-air

connections with charities, campaigns, political parties or other organisations must not risk bringing the BBC's impartiality or integrity into doubt. Where individuals may be restricted in their off-air activities and interests because of the nature of their role with the BBC, this is set out below in External Activities.

15.3.7

People involved in making or presenting content for the BBC risk compromising the integrity of their BBC output – and damaging their own reputation – by off-air involvement in inappropriate commercial interests.

15.3.8

In some areas, such as specialist music or science programming, on-air talent and production staff may have commercial, professional and external personal interests in their area of expertise. In such cases, the relevant division should ensure that appropriate editorial procedures are in place so that there is no conflict of interest with their on-air role. Such procedures must be referred to Editorial Policy.

15.3.9

News and Current Affairs

News and current affairs output may deal with any issue, cause, organisation or individual and there must be no doubt over the integrity and impartiality of editorial teams. It is important that audiences can trust BBC news and current affairs content. For these reasons, there are additional constraints on those involved in the production and presentation of BBC news and current affairs output.

These restrictions safeguard the BBC's impartiality and protect individuals involved, who may face accusations of bias.

15.3.10 There are also significant restrictions on the external and commercial work that it is appropriate for individuals working in news and current affairs to carry out. These restrictions are set out below in External Activities.

15.3.11 **Financial Journalism**

There are additional requirements of, and legal constraints on, financial journalists. People working on financial programmes for the BBC should register their shareholdings and other financial interests or dealings. It is illegal to use financial information acquired in advance to trade ahead of the markets. It is also illegal to promote financial services without proper authorisation from the relevant regulatory authorities. Further information is in the Conflicts of Interest Guidance.

External Activities

- 15.3.12** External activities which may give rise to a conflict of interest include, but are not limited to:
- public expressions of opinion
 - political activities
 - involvement with charities and campaigns
 - writing commitments
 - public appearances
 - academic roles
 - media training
 - promotional work, including commercial advertisements and endorsements
 - references to the BBC and BBC content in advertisements that are not connected to the BBC
 - regular contributions to third-party output
 - actors and artists replicating a BBC role in external output
 - presenters of factual output appearing in drama
 - talent- or agent-owned independent content production companies.

Public Expressions of Opinion

15.3.13

Where individuals identify themselves as being linked with the BBC, or are programme makers, editorial staff, reporters or presenters primarily associated with the BBC, their public expressions of opinion have the potential to compromise the BBC's impartiality and to damage its reputation. This includes the use of social media and writing letters to the press. Opinions expressed on social media are put into the public domain, can be shared and are searchable.

See Guidance online: Social Media

The risk is greater where the public expressions of opinion overlap with the area of the individual's work. The risk is lower where an individual is expressing views publicly on an unrelated area, for example, a sports or science presenter expressing views on politics or the arts.

15.3.14

Taking a public position on an issue of public policy, political or industrial controversy, or any other 'controversial subject' is likely to be incompatible with some BBC roles. Advance discussion with line managers is essential in all genre areas.

15.3.15

Individuals must clear with the head of department and the Press Office any letters to the press or public expression of opinion if they deal with the subject matter of their programmes, relate to the BBC or broadcasting, or concern matters of public policy, political or industrial controversy or any other 'controversial subject'.

See Section 4 Impartiality: 4.3.4-4.3.5

15.3.16

Presenters who only occasionally present programmes for the BBC should normally clear public expressions of opinion relevant to the subject matter of their programmes if they are to be published around the time of transmission.

15.3.17

Additional Requirements in News and Current Affairs and Some Other Factual Output Regularly Dealing with a Range of Public Policy Issues

Individuals involved in the production or presentation of any output of this nature have additional restrictions and must not:

- state or reveal publicly how they vote or express support for any political party
- express a view for or against any policy which is a matter of current party political debate
- advocate any particular position on a matter of public policy, political or industrial controversy, or any other ‘controversial subject’
- exhort a change in high-profile public policy
- speak or write publicly about the BBC without specific, prior approval from the relevant head of department.

Rare exceptions, for example, when an individual is personally affected by a specific matter, must be declared as a conflict so that mitigating action can be taken.

Factual content teams regularly dealing with a range of public policy issues, may refer to Editorial Policy.

Political Activities

15.3.18

Anyone is entitled to be a member of a political party or other organisation within the law. However, individuals in some roles need to consider whether public disclosure of such membership would risk undermining public confidence in their ability to fulfil some or all aspects of their job, or otherwise risk the perception of the BBC’s impartiality.

15.3.19

Active involvement in a political party – or other public activity which demonstrates a political view – may give rise to a conflict of interest for those engaged by the BBC or who are publicly associated

with the BBC. This includes on-air talent on long-term contracts.

Such activity must not compromise the BBC's impartiality or integrity or undermine public confidence in the BBC. Judgements about what is acceptable will reflect individual circumstances, including the type of activity and the nature of the individual's BBC role.

See Section 4 Impartiality: 4.3.4-4.3.5

See Guidance online: Conflicts of Interest

15.3.20

Political activity is likely to be incompatible with some BBC roles.

Chief Adviser Politics must be consulted at the outset if there is any possibility of political activity being perceived as a risk to BBC impartiality.

15.3.21

Seeking nomination as a party candidate in a national or local election, or expressing an intention to stand as an independent candidate, is incompatible with some BBC roles that may deal with matters of public policy, political or industrial controversy, or any other 'controversial subject'. It is likely to be incompatible with most roles in News and Current Affairs (see overleaf).

Anyone who intends to seek nomination for election at national or local level should discuss with their manager at the outset the implications for their professional responsibilities and any potential risk to the BBC's impartiality.

Where any individual undertaking work for the BBC intends to stand as a candidate in a national or local election – including seeking nomination as a party candidate – this must be referred to Chief Adviser Politics at the outset.

15.3.22 **Additional Requirements in News and Current Affairs**

Any political activities, such as campaigning or expressing views on social media with regard to issues of public policy and other controversial subjects, are likely to be incompatible with roles in News and Current Affairs.

Being an active member of a political party is incompatible with most roles in News and Current Affairs. Advice may be sought from the Chief Adviser Politics.

Charities and Campaign Work

15.3.23 Any work undertaken for, or in support of, a charity or charitable cause should not imply BBC endorsement for one charity or cause above others. There will be particular sensitivities if the charity's work relates to matters of public policy, political or industrial controversy, or any other 'controversial subject'. Individuals must ensure their impartiality is not compromised by associating themselves with a charity operating in the same area as the output on which they work.

15.3.24 Many organisations, including campaigning and lobby groups, charities, newspapers and specialist websites, maintain a public position on matters of public policy, political or industrial controversy, or any other 'controversial subject'. Before becoming actively involved with, or offering public support to, an organisation with a partial or campaigning stance on such matters, individuals engaged by the BBC should give the same consideration to the impartiality risks as is required for party political activity.

Any proposal by individuals to work for, or be publicly associated with, charities and campaigning groups must be referred to the head of department, who must consult Editorial Policy.

15.3.25**Additional Requirements in News and Current Affairs, Factual and Consumer Output**

Presenters, reporters and editorial people in news, current affairs, factual and consumer output should not normally associate themselves with any campaigning body, particularly if it backs one viewpoint in a controversial area of policy.

News and current affairs presenters should not front campaigns for charities or campaigning bodies as this could compromise the BBC's reputation for impartiality. Any proposal that would not comply with this must be referred to Director Editorial Policy and Standards.

Writing Commitments

15.3.26

All individuals involved in the production or presentation of editorial output for the BBC may wish to undertake external work, including writing articles, or books, or for publications on websites. Such activity should not risk compromising the impartiality or integrity of the BBC or its content or risk damaging the reputation of the BBC.

Any proposals to write about current affairs, or matters of public policy, or political or industrial controversy or other 'controversial subjects' must be referred to a senior level in the relevant division. In the case of freelancers, referral must be made if publication is likely to coincide with the time of broadcast of relevant output.

See Guidance online: Conflicts of Interest

15.3.27**Additional Requirements in News and Current Affairs**

Individuals involved in the production or presentation of news and current affairs output – including freelancers primarily

known as BBC news presenters or reporters – must refer proposals to write columns or blog posts for external publications to a senior level in the relevant division.

The columns, whether regular or one-off, must be read by a senior editorial figure within the BBC and the content must meet the requirements of the Editorial Guidelines.

Individuals cannot write a regular newspaper or magazine column dealing with current affairs or matters of public policy, political or industrial controversy, or any other ‘controversial subjects’.

Permission from a senior editorial figure is required for those working in news and current affairs areas to publish books. The book should not compromise the integrity or impartiality of the BBC.

Public Speaking and Other Public Appearances

15.3.28

Public speaking commitments or other public appearances should not compromise the impartiality or integrity of the BBC or its content, or suggest that any part of the BBC endorses a third-party organisation, product, service or campaign.

Where freelance presenters of BBC programmes undertake off-air public appearances it may undermine their on-air role for the BBC. They should not allow the use of the BBC’s name or brands in connection with advertising for a public appearance. There should be no suggestion of a BBC connection or endorsement of the third-party event or organisation, unless it is editorially appropriate and has been approved by the relevant head of department.

15.3.29

Additional Requirements in News and Current Affairs

Individuals involved in the production or presentation of BBC news and current affairs output – including freelances known primarily as presenters or reporters

on BBC news and current affairs output – must remain impartial when speaking publicly or taking part in events, such as a public discussion or debate. They must not promote any political party, campaigning organisation or lobby group. Chairing conferences may create conflicts of interests. They should not chair conferences which are a promotional exercise for a commercial company that directly supports any political parties, or is not impartial on a matter of public policy, political or industrial controversy or any other ‘controversial subject’.

Academic Roles

- 15.3.30** BBC presenters and editorial figures may undertake academic roles while continuing to work for the BBC; however, these roles should not compromise the impartiality or integrity of the BBC or its content or risk damaging the BBC’s reputation.

Media Training

- 15.3.31** BBC presenters, senior editorial figures and other output producers may speak at conferences or other events about matters pertaining to broadcasting, journalism or general production. However, their involvement should not compromise the impartiality or integrity of the BBC or its content or risk damaging the BBC’s reputation.
- Providing media training may give rise to a conflict of interest if the individuals or organisations being trained are given instruction on how to present themselves in the media.

Individuals involved in the production or presentation of editorial output for the BBC must obtain permission from line managers before agreeing to provide media training. Freelance presenters must disclose their

training work where it may be a conflict of interest with their work for the BBC.

15.3.32

Additional Requirements in News and Current Affairs

Individuals involved in the production or presentation of BBC news and current affairs output – including freelancers known primarily as presenters or reporters on BBC news and current affairs output – must not undertake commercial media training work.

There may be occasions where individuals can be involved in media training, for example, to assist in the training of aspirant journalists; these must be approved by line managers. They should not normally interview anyone they have previously trained.

Personal Benefits

15.3.33

Under no circumstances should anyone working for the BBC or on behalf of the BBC receive personal benefits from suppliers or accept goods or services as inducements. The requirements of the Editorial Guidelines are consistent with the BBC's Anti-Bribery Code of Conduct.

Any offer of hospitality from outside bodies or companies must be considered carefully to ensure it does not constitute a conflict of interest or compromise the public perception of the BBC's impartiality or integrity or otherwise risk damaging its reputation.

Individuals must not accept personal benefits, or benefits for their family or close personal relations, from organisations or people with whom they might have dealings on the BBC's behalf. Unacceptable personal benefits include goods, discounts, services, cash, loans, gratuities or entertainment outside the normal scope of business hospitality.

Any exception to this, where it could affect production of content for the BBC, must be referred to the relevant head of department, who should normally consult Editorial Policy, to establish whether accepting the offer constitutes a conflict of interest.

The acceptance for use in BBC programmes of products, goods – including clothing – or services free or at significantly reduced cost without prior approval could risk bringing the BBC into disrepute.

See Section 14 Independence from External Interests: 14.3.13-14.3.15

See Guidance online: Props

On-Air Talent and Promotional Activity Including Commercial Advertising and Endorsements

15.3.34

The BBC does not seek to place unnecessary or unreasonable restrictions on talent, whether on-air talent or other production talent. However, promotional activity, which includes commercial advertising and endorsements, must not risk damaging the integrity of the BBC content they are associated with, or risk damaging the BBC's reputation generally. Nor should those activities undermine the personal reputation of the individual.

Promotional work must not suggest BBC endorsement, compromise the BBC's values, bring the BBC into disrepute, or give the public reason to doubt the impartiality or integrity of BBC on-air talent.

Even where there is no conflict of interest with an individual's on-air role, there are some products or services which on-air talent should not promote as the association would risk damaging the BBC's reputation (such as tobacco or tobacco products and adult products and services).

The promotional commitments of on-air talent have the potential to risk the editorial integrity of BBC output. For example, a presenter's promotional activities may lead to changes in the editorial content of their output or lead to some subjects being omitted.

15.3.35

When engaging new talent, and when existing talent is considering undertaking new promotional activities, consideration should be given as to whether the promotional activities will have – or could be perceived to have – undue influence on the output's editorial agenda.

The promotional activities that can be undertaken by on-air talent will vary according to the different areas they work in. Individuals whose work is factual and journalistic may have specific limits on what, if any, promotional activities they may undertake. There are likely to be fewer considerations in relation to talent working in entertainment, sport or lifestyle output, as long as their integrity and the integrity of the programme they present is not compromised.

There will be fewer restrictions on an individual seen as an independent outsider, or expert, who presents few programmes, strands or a one-off series, but is not considered to be primarily a BBC presenter.

15.3.36

No on-air talent should promote products, goods, services or clothing they use on air. On-air talent, in any genre, engaged by the BBC must not accept clothing or products free, or at considerably reduced cost, in exchange for wearing or using them on air. Nor should they appear on air wearing clothes or using products, goods or services which they have agreed, or been contracted, to promote or in which they have any financial interest.

See Guidance online: Conflicts of Interest

15.3.37

Additional Requirements in Factual Output

On-air talent who appear regularly in serious factual output which considers matters of public policy or political or industrial controversy are unlikely to be able to take part in any promotional activity for third parties.

On-air talent on consumer output that covers a wide range of topics must not undertake any promotional work for third parties as there is no product or service outside the remit of the output.

On-air talent on consumer output that covers a specific topic may only be permitted to undertake promotions for products entirely unconnected with the subject matter of the output.

Talent whose on-air role involves giving advice on the purchase or use of branded products must not undertake any promotional work for products or retailers associated with the subject matter of the output.

Talent whose on-air role involves giving advice on how to solve problems should not promote products or services which aim to solve these specific problems.

15.3.38

Additional Requirements in Children's Output

On-air talent on children's output must not promote products directly connected to the subject matter of the programmes they present, aimed specifically at children.

On-air talent on children's output must not promote products that are likely to be harmful to children (such as alcohol) or which are incompatible with their on-air role.

15.3.39 **Additional Requirements in News and Current Affairs**

On-air talent on news, current affairs and business programmes are not permitted to take part in any promotional activity for third parties. Promotional activities in relation to BBC group² functions may be permitted.

References to BBC Content in Advertisements

15.3.40 Advertisements or promotions involving talent should not imitate, suggest a reference or connection to or 'pass off' BBC content, for example, by replicating any editorial elements of a programme, such as characters, logos, titles, channel names or music or graphics associated with the programme, or by using or directly imitating sets or key venues, catchphrases or format points from the content.

Advertisements should not replicate or 'pass off' the role the talent plays in the programme. There should not be use of more than one member of BBC talent from the same programme in any advertisement for a non-BBC-related product. It is unlikely to be acceptable for several members of talent from different BBC programmes to appear in the same advertisement.

The advertisement should not bring the BBC into disrepute.

See Section 16 External Relationships and Financing: 16.3.20

Regular Contributors to Output

15.3.41 Consideration needs to be given to promotional or external activities undertaken by contributors who appear in programmes regularly but who are not engaged as presenters or as part of the presenting team. The BBC is not in a position to restrict, and would not normally wish to restrict, the advertising, promotional or external activities of those outside contributors. However, the BBC

² BBC group consists of the BBC's public services and its public service and commercial subsidiaries.

should not use contributors where such outside promotional or external activities could reasonably give rise to doubts about their impartiality, integrity or independence or that of content to which they are contributing.

Actors and Artists Replicating Their BBC Roles in Other Output

15.3.42

Actors and artists who perform in BBC output should not appear in promotional work, including advertisements, in a way which mimics or replicates their on-air roles for the BBC.

Actors, artists and/or performers from the same BBC output should not normally appear together in the same advertisement or separately across a series of advertisements for the same product. There will also be considerations around the timeframe for such promotions.

See Guidance online: Conflicts of Interest

15.3.43

Presenters of Factual Output Appearing in Drama

Presenters of BBC factual output who wish to recreate their roles in fictional output may risk confusing audiences and undermining the credibility of their own output as well as damaging their own reputations. Any proposal to do so must be referred to their head of department.

Current presenters of BBC news output should not appear as news presenters in a fictional bulletin if there is a reasonable possibility that this could confuse or mislead audiences. Any proposal to do so, for example in a comic, unrealistic or fantasy situation, must be referred to their head of department.

See Guidance online: Fictitious News Bulletins

Talent or Agent-Owned Independent Production Companies

15.3.44

The involvement of talent or their agents in the ownership or senior management of independent production companies making content for the BBC must not cast doubt over the impartiality, integrity or editorial judgements of any BBC output.

It is essential that the BBC is seen to be, and can demonstrate that it is, in overall editorial control of all aspects of the programme or content and has put in place appropriate measures to maintain editorial control and to ensure there is no conflict of interest. BBC content must not be used as a vehicle to promote the external commercial interests of talent or their agents.

There are strong risks of a conflict of interest if talent and/or their production companies are commissioned to produce programmes about themselves. The same applies to agents and/or their production companies who pitch content about the talent they represent.

There may be circumstances where it is not possible to produce a programme about specific talent unless it is produced by an independent production company owned by, or as a co-production with, that talent or an associated agency. In such cases, proposals can only be considered if there is strong editorial justification. The matter must be referred to the relevant divisional director and Editorial Policy; Director Editorial Policy and Standards must also be consulted.

