

# Impartiality



**04**

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## 4.1 Introduction

The BBC is committed to achieving due impartiality in all its output. This commitment is fundamental to our reputation, our values and the trust of audiences. The term ‘due’ means that the impartiality must be adequate and appropriate to the output, taking account of the subject and nature of the content, the likely audience expectation and any signposting that may influence that expectation<sup>1</sup>.

Due impartiality usually involves more than a simple matter of ‘balance’ between opposing viewpoints. We must be inclusive, considering the broad perspective and ensuring that the existence of a range of views is appropriately reflected. It does not require absolute neutrality on every issue or detachment from fundamental democratic principles, such as the right to vote, freedom of expression and the rule of law. We are committed to reflecting a wide range of subject matter and perspectives across our output as a whole and over an appropriate timeframe so that no significant strand of thought is under-represented or omitted.

In applying due impartiality to news, we give due weight to events, opinion and the main strands of argument. We may produce content about any subject, at any point on the spectrum of debate, as long as there are good editorial reasons for doing so.

We must always scrutinise arguments, question consensus and hold power to account with consistency and due impartiality.

Where our content highlights issues on which others campaign, we must take care not to endorse those

- 1 The section of the Ofcom Broadcasting Code that relates to this is 5: Due Impartiality and Due Accuracy and Undue Prominence of Views and Opinions. However, Rule 5.13 on Undue Prominence of Views and Opinions does not apply to the BBC.
- 2 The Framework Agreement accompanying the BBC Charter requires us to observe the impartiality requirements of the Broadcasting Code; however, by applying ‘due impartiality’ to all output, we exceed that requirement.

campaigns, or allow ourselves to be used to campaign to change public policy. But this should not prevent us highlighting issues and offering our audiences choices about how to confront them.

The external activities and public comments, for example on social media, of staff, presenters and others who contribute to our output can also affect perceptions of the BBC's impartiality. Consequently, this section should be read in conjunction with Section 15: Conflicts of Interest.

We should take account of the different political cultures and structures in different parts of the UK, and different cultural views in other communities. We should seek to ensure that differing main strands of argument in nations, regions and communities receive due weight and prominence in UK-wide output.

Audiences expect artists, writers and entertainers to have freedom to explore subjects from one perspective and to create content that reflects their own distinctive voice. It must be clear to audiences where personal views are being expressed.

## 4.2 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 Editorial Policy

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#### 4.2.1

Where content would not normally include political issues, political opinion or politicians (for example, sport, quiz/panel shows, factual entertainment) content producers must consult the Chief Adviser Politics in advance before inviting a politician to take part in their output, or before accepting a request to participate. This reference is irrespective of whether their contribution to the output is itself 'political'.



Where there is a proposal to involve in such output others who may have taken a prominent political stance, advice is available from Editorial Policy.

See Section 4 Impartiality: 4.3.24 and Section 10 Politics, Public Policy and Polls: 10.3.2

## 4.3 Guidelines

### Diversity of Opinion

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- 4.3.1** Across our output as a whole, we must be inclusive, reflecting a breadth and diversity of opinion.
- Breadth and diversity of opinion may require not just a political and cultural range, but, on occasions, reflection of the variations between urban and rural, older and younger, poorer and wealthier, the innovative and the status quo, etc. It may involve exploration of perspectives in different communities, interest groups and geographic areas.

### Due Weight

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- 4.3.2** Impartiality does not necessarily require the range of perspectives or opinions to be covered in equal proportions either across our output as a whole, or within a single programme, webpage or item. Instead, we should seek to achieve 'due weight'. For example, minority views should not necessarily be given similar prominence or weight to those with more support or to the prevailing consensus.
- 4.3.3** There may be occasions when the omission of views or other material could jeopardise impartiality. There is no view on any subject which must be excluded as a matter of principle, but we should make reasoned decisions, applying consistent editorial judgement, about whether to include or omit perspectives.

See Section 4 Impartiality: 4.3.14

## Impartiality in BBC Content

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### 4.3.4

#### Controversial Subjects

We must apply due impartiality to all our subject matter. However, there are particular requirements for ‘controversial subjects’ whenever they occur in any output, including drama, entertainment and sport.

A ‘controversial subject’ may be a matter of public policy or political or industrial controversy. It may also be a controversy within religion, science, finance, culture, ethics or any other matter.

### 4.3.5

In determining whether subjects are controversial, we should take account of:

- the level of public and political contention and debate
- how topical the subject is
- sensitivity in terms of relevant audiences’ beliefs and culture
- whether the subject is a matter of intense debate or importance in a particular nation, region, community or discrete area likely to comprise at least a significant part of the audience
- a reasonable view on whether the subject is serious
- the distinction between matters grounded in fact and those which are a matter of opinion.

Advice on whether a subject is ‘controversial’ is available from Editorial Policy.

### 4.3.6

When dealing with ‘controversial subjects’, we must ensure a wide range of significant views and perspectives are given due weight and prominence, particularly when the controversy is active. Opinion should be clearly distinguished from fact.

See Section 4 Impartiality: 4.3.2-4.3.3

### 4.3.7

We must take particular care to achieve due impartiality when a ‘controversial subject’ may be considered to be a major matter<sup>2</sup>. ‘Major matters’ are usually matters of public policy or political or industrial controversy that are of national or international importance, or of a similar significance within a smaller coverage area. When dealing with ‘major matters’, or when the issues involved are highly controversial and/or a decisive moment in the controversy is expected, it will normally be necessary to ensure that an appropriately wide range of significant views are reflected in a clearly linked ‘series of programmes’, a single programme or web item, or sometimes even a single item in a programme.

See Section 4 Impartiality: 4.3.22-4.3.24

### 4.3.8

Due impartiality normally allows for programmes and other output to explore or report on a specific aspect of an issue or provide an opportunity for a single view to be expressed. This should be clearly signposted when dealing with ‘controversial subjects’. The existence of a range of views and their respective weights should be acknowledged, and neither those views nor their respective weights should be misrepresented.

See Section 4 Impartiality: 4.3.28-4.3.30

Consideration should be given to the appropriate timeframe for reflecting other perspectives and whether or not they need to be included in connected and signposted output.

See Section 4 Impartiality: 4.3.22-4.3.24

If such output contains serious allegations, a response may be required, either as part of the same output, or in a connected and clearly signposted alternative.

See Section 6 Fairness to Contributors and Consent: 6.3.38-6.3.41

**4.3.9**

Where BBC online sites covering ‘controversial subjects’ offer links to external sites, we should try to ensure that the information on those external sites, taken together, represents a reasonable range of views about the subject.

See Section 14 Independence from External Interests: 14.3.20

See Guidance online: Links and Feeds

**4.3.10****News, Current Affairs and Factual Output**

News in whatever form must be treated with due impartiality, giving due weight to events, opinion and main strands of argument. The approach and tone of news stories must always reflect our editorial values, including our commitment to impartiality.

**4.3.11**

Presenters, reporters and correspondents are the public face and voice of the BBC – they can have a significant impact on perceptions of whether due impartiality has been achieved. Our audiences should not be able to tell from BBC output the personal opinions of our journalists or news and current affairs presenters on matters of public policy, political or industrial controversy, or on ‘controversial subjects’ in any other area. They may provide professional judgements, rooted in evidence, but may not express personal views on such matters publicly, including in any BBC-branded output or on personal blogs and social media.

See Section 15 Conflicts of Interest: 15.3.13-15.3.17

See Guidance online: Social Media

## Contributors’ Affiliations

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**4.3.12**

We should not automatically assume that contributors from other organisations (such as academics, journalists, researchers and representatives of charities and think-tanks) are unbiased. Appropriate information about their affiliations, funding and particular viewpoints should be made available to the audience, when relevant to the context.

## Where BBC Content or the BBC is the Story

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### 4.3.13

When dealing with issues concerning the BBC, our reporting must remain duly impartial, as well as accurate and fair. We need to ensure the BBC's impartiality is not brought into question and presenters and reporters are not exposed to potential conflicts of interest. When reporting on the BBC, it will normally be wrong to refer to the BBC as either 'we' or the content as 'ours'. There should also be clear editorial separation between those reporting the story and those responsible for presenting the BBC's case.

## Contentious Views and Possible Offence

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### 4.3.14

Contributors expressing contentious views, either through an interview or other means, must be challenged while being given a fair chance to set out their response to questions. Minority views should be given appropriate space in our output.

Consequently, we will sometimes include in our output people whose views may cause serious offence to many in our audiences. On such occasions, referral should be made to a senior editorial figure, who should consult Editorial Policy.

The potential for offence must be weighed against the public interest<sup>3</sup> and any risk to the BBC's impartiality. Coverage should acknowledge the possibility of offence, and be appropriately robust, but it should also be fair and dispassionate.

The public expression by staff and presenters of personal offence or indignation, or the tone or attitude of an item or programme as a whole may jeopardise the BBC's impartiality.

See Section 5 Harm and Offence: 5.3.32 and 5.3.38 and Section 8 Reporting Crime and Anti-Social Behaviour: 8.3.3

<sup>3</sup> See Section 1 The BBC's Editorial Standards: 1.3 The Public Interest.

## Consensus, Campaigns and Scrutiny

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### 4.3.15

#### Consensus

There are some issues which may seem to be without controversy, appearing to be backed by a broad or even unanimous consensus of opinion. Nevertheless, they may present a significant risk to the BBC's impartiality. In such cases, we should continue to report where the consensus lies and give it due weight. However, even if it may be neither necessary nor appropriate to seek out voices of opposition, our reporting should not use language and tone which appear to accept consensus or received wisdom as fact or self-evident.

See Section 4 Impartiality: 4.3.28-4.3.30

We must challenge our own assumptions and experiences and also those which may be commonly held by parts of our audience. BBC output should avoid reinforcing generalisations which lack relevant evidence, especially when applying them to specific circumstances. This might occur in the fields of politics, race, charity, science, technology, medicine or elsewhere. These can present some of the most difficult challenges to asserting that the BBC does not hold its own opinion. Care should be taken to treat areas of apparent consensus with proper rigour. Where necessary, consult Editorial Policy.

### 4.3.16

On occasion, an individual programme or other content, which is not part of a series or long-running or continuous output, may include the expression of a view on a 'controversial subject' and still meet the requirements of due impartiality for that individual programme or content.

Some issues, when relating to matters of ethics and public policy, may lend themselves to sympathetic case studies or may be more likely to be approached from an individual's perspective.

Consideration will sometimes need to be given where such an approach – which meets due impartiality requirements in itself – may produce a cumulative effect if it occurs repeatedly, especially across the same service. Relevant output controllers may also, occasionally, need to take account of such a cumulative effect across different services.

#### 4.3.17 **Campaigns and Initiatives**

The BBC must remain independent and distanced from government initiatives, campaigners, charities and their agendas, no matter how apparently worthy the cause or how much their message appears to be accepted or uncontroversial.

#### 4.3.18 **Careful thought will be necessary to ensure perceptions of the BBC's impartiality are maintained when content is scheduled topically and coincides with a third party's campaign or initiative. It is advisable to contact Editorial Policy.**

See Section 14 Independence from External Interests: 14.3.20

#### 4.3.19 **Social Action**

Social action output can form an important part of the BBC's public service. However, care is required to ensure the BBC sets its own social action agenda and decides its own priorities:

- we must ensure that our output does not simply embrace the agenda of any particular campaign groups or charities and that we treat groups objectively and do not favour one above another
- if our social action programmes or campaigns coincide with a government campaign or lobbying initiative, it is important we retain an arm's-length position
- the BBC must not lobby on matters of public policy when raising awareness of important social issues

- news reporting of BBC social action campaigns must be duly impartial.

Social action initiatives must not involve any element of on-air fund raising except for BBC charitable appeals.

See Section 16 External Relationships and Financing: 16.3.7-16.3.11

#### 4.3.20

#### Scrutiny

We should ensure that appropriate scrutiny is applied to those who are in government, or otherwise hold power and responsibility, but also, as appropriate, to those who oppose or seek to influence them, such as campaigners, lobbyists, opposition parties and others; this may include scrutiny of views and arguments expressed on our output by the audience.

## Elections and Referendums

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#### 4.3.21

Special considerations apply during the campaign periods for elections and referendums (as well as the run-up to campaign periods in some cases), involving greater sensitivity with regard to due impartiality in all output genres. Chief Adviser Politics will issue specific advice and, for the UK, will publish separate Guidelines for each campaign period.

See Section 10 Politics, Public Policy and Polls: 10.3.13-10.3.19

## Impartiality in Series and Over Time

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#### 4.3.22

In achieving due impartiality, a 'series of programmes' may be considered as a whole<sup>4</sup>.

The term 'series of programmes' applies to the following:

- multiple pieces of content that deal with the same or related issues and are editorially linked, within an appropriate period.

4 The Ofcom Broadcasting Code, Section 5.



This may include a strand with a common title; different types of linked programmes (such as a drama with a following debate); a clearly identified season of programmes or items on the same or similar subjects; or a set of interlinked webpages or social media posts. Such content, items or webpages need to achieve due impartiality across the series, and should include appropriate links or signposting.

The intention to achieve due impartiality in this way should be planned in advance and made clear in our output.

- programmes dealing with widely disparate issues from one edition to the next, but also clearly linked as a continuing strand with a common title and a particular remit.

In strands, due impartiality should normally be achieved within individual programmes, or across a specific number of explicitly editorially linked programmes. However, across a whole series or over time these strands will also need to demonstrate due impartiality, for example through a consistent application of editorial judgement.

### 4.3.23

On long-running or continuous output (such as general daily magazine programmes, the News Channel, the BBC News website, social channels) due impartiality may be achieved over time by the consistent application of editorial judgement in relevant subject areas. For instance, an appearance by a politician, or other contributor with partial views, does not normally have to be followed by someone taking a contrary view, although it may sometimes be necessary to offer the opportunity to respond.

However, editors of long-running or continuous output should ensure that:

- it reflects a broad range of individuals and views, including, where editorially appropriate, all main strands of argument

- differing views are given due weight and treated fairly, including in terms of prominence, treatment and time of day
- there is an appropriate timeframe for assessing that due impartiality has been achieved. Particular care is required approaching elections.

#### 4.3.24

Some output which covers normally non-controversial areas (such as favourite music or books, sporting allegiances or personal biography) may seek, on an occasional basis, to include contributors or presenters who are otherwise known for their partiality, for example politicians, campaigners or others who are identified with particular views. Over time, an appropriate range of such contributors should be considered. There will be different considerations during the run-up to election and referendum periods.

See Section 4 Impartiality: 4.3.2-4.3.8 and 4.3.21

**Where content would not normally include political issues, political opinion or politicians (for example, sport, quiz/ panel shows, factual entertainment) content producers must consult the Chief Adviser Politics in advance before inviting a politician to take part in their output, or before accepting a request to participate. This reference is irrespective of whether their contribution to the output is itself 'political'. Where there is a proposal to involve in such output others who may have taken a prominent political stance, advice is available from Editorial Policy.**

In all instances where the aim is to achieve due impartiality regarding politics or public policy over a series or over time, the run-up to election and referendum periods must be given special

consideration. Advice is available from Chief Adviser Politics.

See Section 10 Politics, Public Policy and Polls:  
10.3.2 and 10.3.13-10.3.19

## Impartiality and Audiences

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### 4.3.25

Listening to and engaging with audiences is central to the BBC's output. But responses should not be given a wider significance than they merit and we should take care not to misrepresent the relative weight of opinions expressed. We should also be prepared to apply appropriate scrutiny to audience opinions and ensure that the debate does not appear to discount members of the audience who support a minority view.

See Guidance online: User-Generated Contributions

## Drama, Entertainment and Culture

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### 4.3.26

The audience expects artists, writers and entertainers to have scope for individual expression in drama, entertainment and cultural output. The BBC is committed to offering it. Where this covers matters of public policy, political or industrial controversy, or other 'controversial subjects', services should consider reflecting a broad range of the available perspectives over time. Consideration should be given to the appropriate timeframe for reflecting those other perspectives and whether or not they need to be included in connected and/or signposted output taking account of the nature of the controversy and the subject matter. We should also consider whether any conflicts of interest may arise.

See Section 15 Conflicts of Interest

### 4.3.27

A drama where a view of ‘controversial subjects’ is central to its purpose, must be clearly signalled to our audience. It may be appropriate to offer alternative views in other connected and/or signposted output. Advice is available from Editorial Policy.

See Section 4 Impartiality: 4.3.4-4.3.8, Section 3 Accuracy: 3.3.25 and Section 6 Fairness to Contributors and Consent: 6.3.38-6.3.40

## Personal View Content

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### 4.3.28

The BBC has a tradition of enabling a wide range of individuals, groups or organisations to offer a personal view or opinion, express a belief, or advance a contentious argument in its output. This can range from the outright expression of highly partial views by a campaigner, to the opinion of a specialist or professional including an academic or scientist, to views expressed through contributions from our audiences. All of these can add to the public understanding and debate, especially when they allow our audience to hear fresh and original perspectives on familiar issues.

Such personal view content must be clearly signposted to audiences in advance.

### 4.3.29

Additionally, when personal view programmes and websites (for example, blogs) cover ‘controversial subjects’, especially those concerning matters of public policy or political or industrial controversy, we should:

- retain a respect for factual accuracy
- fairly represent opposing viewpoints when included
- provide an opportunity to respond when appropriate, for example in a pre-arranged discussion programme

See Section 6 Fairness to Contributors and Consent: 6.3.38-6.3.40

- ensure that a sufficiently broad range of views and perspectives is included in output of a similar type and weight and in an appropriate timeframe.

**4.3.30**

BBC staff and regular BBC presenters or reporters associated with news or public policy-related output may offer professional judgements rooted in evidence. However, it is not normally appropriate for them to present or write personal view content on public policy, matters of political or industrial controversy, or 'controversial subjects' in any area.

See Section 4 Impartiality: 4.3.10-4.3.11

