

## **SECTION 4: IMPARTIALITY**

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## **4.1 INTRODUCTION**

Impartiality lies at the heart of public service and is the core of the BBC's commitment to its audiences. It applies to all our output and services - television, radio, online, and in our international services and commercial magazines. We must be inclusive, considering the broad perspective and ensuring the existence of a range of views is appropriately reflected.

The Agreement accompanying the BBC Charter requires us to do all we can to ensure controversial subjects are treated with due impartiality in our news and other output dealing with matters of public policy or political or industrial controversy<sup>1</sup>. But we go further than that, applying due impartiality to all subjects. However, its requirements will vary.

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.

Due impartiality is often more than a simple matter of 'balance' between opposing viewpoints. Equally, it does not require absolute neutrality on every issue or detachment from fundamental democratic principles.

The BBC Agreement forbids our output from expressing the opinion of the BBC on current affairs or matters of public policy, other than broadcasting or the provision of online services<sup>2</sup>.

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

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<sup>1</sup> Paragraph 44 (1), Broadcasting: An Agreement Between Her Majesty's Secretary of State for Culture, Media and Sport and the British Broadcasting Corporation, July 2006

<sup>2</sup> Paragraph 44 (3) and Paragraph 44 (4), Broadcasting: An Agreement Between Her Majesty's Secretary of State for Culture, Media and Sport and the British Broadcasting Corporation, July 2006

## 4.2 PRINCIPLES

4.2.1 We must do all we can to ensure that ‘controversial subjects’<sup>3</sup> are treated with due impartiality in all our output.

4.2.2 News in whatever form must be treated with due impartiality, giving due weight to events, opinion and main strands of argument.

4.2.3 We seek to provide a broad range of subject matter and perspectives over an appropriate timeframe across our output as a whole.

4.2.4 We are committed to reflecting a wide range of opinion across our output as a whole and over an appropriate timeframe so that no significant strand of thought is knowingly unreflected or under-represented.

4.2.5 We exercise our editorial freedom to produce content about any subject, at any point on the spectrum of debate, as long as there are good editorial reasons for doing so.

## 4.3 MANDATORY REFERRALS

*(Mandatory Referrals are part of the BBC’s editorial management system. While they will not, in themselves, meet the Principles in the Editorial Guidelines, they are an essential part of the process to ensure compliance and must be observed.)*

### **Referrals to Editorial Policy**

4.3.1 Any approach by a government department to relay official messages or information films which involve a degree of public policy or political controversy must be referred to Chief Adviser Politics.

(See 4.4.11)

4.3.2 Any BBC public service initiative involving any element of fundraising must be referred to Chief Adviser Editorial Policy.

(See 4.4.22)

4.3.3 Any proposal to invite a politician to be a guest on a programme or area of content where to do so is the exception rather than the rule, must be referred to Chief Adviser Politics.

(See 4.4.27)

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<sup>3</sup> See Section 4 Impartiality: 4.4.5 - 4.4.6

## **PRACTICES**

### **Breadth and Diversity of Opinion**

4.4.1 Across our output as a whole, we must be inclusive, reflecting a breadth and diversity of opinion. We must be fair and open-minded when examining the evidence and weighing material facts. We must give due weight to the many and diverse areas of an argument.

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***

4.4.2 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, web page or item. Instead, we should seek to achieve 'due weight'. For example, minority views should not necessarily be given equal weight to the prevailing consensus.

Nevertheless, the omission of an important perspective, in a particular context, may jeopardise perceptions of the BBC's impartiality. Decisions over whether to include or omit perspectives should be reasonable and carefully reached, with consistently applied editorial judgement across an appropriate range of output.

(See Section 4 Impartiality: 4.4.18)

#### ***Reporting the UK***

4.4.3 We should also take account of the different political cultures and structures in different parts of the UK, for instance, in ensuring that differing main strands of argument in one or more of the nations receive due weight and prominence in UK-wide output.

(See Section 10 Politics, Public Policy and Polls: 10.4.1)  
(See Guidance online: Reporting the UK)

#### ***Impartiality and Audiences***

4.4.4. Listening to and engaging with audiences is central to the BBC's output, from radio phone-ins to user generated content online. 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 closed to members of the audience who support a minority view when they have not already made contact.

(See Guidance online: User Contributions in News Output)

## Controversial Subjects

4.4.5 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 and other matters entirely.

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

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

Advice on whether subjects are 'controversial' is available from Editorial Policy.

4.4.7 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:4.4.2)

4.4.8 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. When dealing with 'controversial subjects' this should be clearly signposted, should acknowledge that a range of views exists and the weight of those views, and should not misrepresent them.

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.

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

(See Section 4 Impartiality: 4.4.25 - 4.4.28 and Section 6 Fairness, Contributors and Consent: 6.4.25 - 6.4.28)

4.4.9 In addition, we must take particular care and achieve due impartiality when a 'controversial subject' may be considered to be a major matter<sup>4</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'<sup>5</sup>, a single programme or sometimes even a single item.

(See Section 4 Impartiality: 4.4.25 - 4.4.28)

### ***Controversial Subjects and Linking***

4.4.10 Where BBC online sites covering 'controversial subjects' offer links to external sites, we should ensure that the information on those external sites, taken together, represents a reasonable range of views about the subject. We should normally try to ensure the external sites do not give strong grounds for concern that they breach the law or the BBC Editorial Guidelines on harm and offence.

(See Section 14 Editorial Integrity and Independence from External Interests 14.4.19 - 14.4.20)  
(See Guidance online: Links and Feeds)

### ***Government Information***

**4.4.11 Any approach by a government department to relay official messages or information films which involve a degree of public policy or political controversy must be referred to Chief Adviser Politics.**

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

4.4.12 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.

4.4.13 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 prejudices of our journalists or news and current

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<sup>4</sup> Paragraph 44 (6), Broadcasting: An Agreement Between Her Majesty's Secretary of State for Culture, Media and Sport and the British Broadcasting Corporation, July 2006

<sup>5</sup> See Section 4 Impartiality: 4.4.25

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 in BBC output, including online, on such matters.

(See Section 4 Impartiality: 4.4.29 and Section 15 Conflicts of Interest)

4.4.14 We should not automatically assume that contributors from other organisations (such as academics, journalists, researchers and representatives of charities) are unbiased and we may need to make it clear to the audience when contributors are associated with a particular viewpoint, if it is not apparent from their contribution or from the context in which their contribution is made.

### ***Where BBC Content or the BBC is the Story***

4.4.15 When dealing with controversial subjects 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 or reporters are not exposed to potential conflicts of interest. It will be inappropriate to refer to either the BBC as "we" or the content as "our". There should also be clear editorial separation between those reporting the story and those responsible for presenting the BBC's case.

### **Drama, Entertainment and Culture**

4.4.16 The audience expects artists, writers and entertainers to have scope for individual expression in drama, entertainment and culture. The BBC is committed to offering it. Where this covers matters of public policy, political or industrial controversy, or other 'controversial subjects', services should normally aim to reflect 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 signposted output taking account of the nature of the controversy and the subject matter.

4.4.17 A drama where a view of 'controversial subjects' is central to its purpose, must be clearly signposted to our audience. Its excellence and insights must justify the platform offered. It may be appropriate to offer alternative views in other connected and signposted output. Advice is available from Editorial Policy.

(See Section 4 Impartiality: 4.4.25 - 4.4.28, Section 3 Accuracy: 3.4.19 and Section 6 Fairness, Contributors and Consent: 6.4.29 - 6.4.30)

## **Contentious Views and Possible Offence**

4.4.18 Contributors expressing contentious views, either through an interview or other means, must be rigorously tested while being given a fair chance to set out their full response to questions. Minority views should be given appropriate space in our output; it is not for the BBC to suppress discussion.

(See Section 4 Impartiality: 4.4.2)

Consequently, we will sometimes need to report on, or interview, 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 may wish to consult Editorial Policy. The potential for offence must be weighed against the public interest<sup>6</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 risks jeopardising the BBC's impartiality.

## **Consensus, Campaigns and Scrutiny**

### ***Consensus***

4.4.19 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 resist the temptation to use language and tone which appear to accept consensus or received wisdom as fact or self-evident.

(See Section 4 Impartiality: 4.4.29)

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.

### ***Campaigns***

4.4.20 Similarly, the BBC must remain independent and distanced from government initiatives, campaigners, charities and their agendas, no matter

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<sup>6</sup> See Section 7 Privacy: 7.1 The Public Interest

how apparently worthy the cause or how much their message appears to be accepted or uncontroversial.

4.4.21 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. It is advisable to contact Editorial Policy.

### ***Social Action***

4.4.22 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 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
- We 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.

**Any BBC public service initiative involving any element of fundraising must be referred to Chief Adviser Editorial Policy.**

(See Section 16 External Relationships and Funding)

### ***Scrutiny***

4.4.23 We should ensure that appropriate scrutiny is not limited just to those who are in government, or hold power and responsibility, but is also applied to those who oppose them, campaigns, lobbyists, opposition groups and others, including views expressed interactively by the audience.

(See Section 4 Impartiality: 4.4.4)

### **Elections and Referendums**

4.4.24 Special considerations apply during the campaigns for elections and referendums and, in some cases, the period running up to campaigns will involve 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: 10.4.16 - 10.4.22)

## Impartiality in Series and Over Time

4.4.25 In achieving due impartiality, a 'series of programmes' may be considered as a whole<sup>7</sup>.

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

- *Content that deals with the same or related issues, within an appropriate period, and are clearly linked.*

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 web pages. Such programmes, items or web pages need to achieve due impartiality across the series, and online content should include links or signposts to the other online elements.

The intention to achieve due impartiality in this way should be planned in advance. For programmes, the dates and times of other programmes in the series should be announced at the time of the first relevant programme. Where that is not practicable, advance notice of subsequent programmes in the series should be given in other ways.

- *Programmes dealing with widely disparate issues from one edition to the next, but also clearly linked as a 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.

4.4.26 On long-running or continuous output (such as general daily magazine programmes, the News Channel, Online, etc.) due impartiality may be achieved over time by the consistent application of editorial judgement in relevant subject areas. For instance, it is not usually required for an appearance by a politician, or other contributor with partial views, to be balanced on each occasion by those taking a contrary view, although it may sometimes be necessary to offer a right of reply.

(See Section 6 Fairness, Contributors and Consent: 6.4.25 - 6.4.27)

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

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<sup>7</sup> Paragraph 44 (2), Broadcasting: An Agreement Between Her Majesty's Secretary of State for Culture, Media and Sport and the British Broadcasting Corporation, July 2006

- it reflects a broad range of individuals and views, including all main strands of argument
- differing views are given due weight and treated fairly 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 (see below).

When dealing with 'major matters', due impartiality cannot normally be achieved over time or by a breadth of views available across our online services.

(See Section 4 Impartiality: 4.4.2 and 4.4.5 - 4.4.10)

4.4.27 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. On these occasions, an appropriate breadth and diversity should be achieved over time by a consistent application of editorial judgement which might mean ensuring that, for example, potentially favourable content includes other individuals with differing views. The appropriate timeframe for achieving the necessary breadth and diversity will vary according to context, but it will not normally be greater than a programme series or a year. There will be different considerations during periods approaching elections (see below).

(See Section 10 Politics, Public Policy and Polls: 10.4.3 - 10.4.8)

**Any proposal to invite a politician to be a guest on a programme or area of content where to do so is the exception rather than the rule, must be referred to Chief Adviser Politics.**

In all instances where the aim is to achieve due impartiality regarding politics or public policy over a series or over time, periods approaching elections and referendums must be given special consideration. Advice is available from Chief Adviser Politics.

(See Section 10 Politics, Public Policy and Polls: 10.4.16 - 10.4.22)

4.4.28 On occasion, an individual programme or other content, which is not part of a series or long-running or continuous output, includes the expression of a view on a 'controversial subject' and still meets the requirements of due impartiality for that individual programme or content. On such occasions, referral should be made to the relevant output controller, so that consideration can be given to due impartiality across the relevant service if necessary.

## Personal View Content

4.4.29 The BBC has a tradition of allowing 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.

4.4.30 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, Contributors and Consent: 6.4.25 - 6.4.27)
- 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.

4.4.31 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 programmes and content on public policy, on matters of political or industrial controversy, or on 'controversial subjects' in any area.

(See Section 4 Impartiality: 4.4.12 - 4.4.15)