

## **A&M Compliance Policy (From 2<sup>nd</sup> April 2011)**

**NOTE:** This is **mandatory** policy and should be treated as such.

**All pre-recorded programmes must have a compliance form submitted prior to broadcast.**

**This must be signed off by both the producer (or agreed independent production company representative) and a senior BBC editorial figure/network representative before TX.**

(i.e. out of the 3 levels of sign off available on Proteus, two levels must be signed. Networks may add a third sign off if they require, but in any event, they should check there are the two sign offs before TX. Until Indies get access to Proteus, they must email a compliance form into the network, who will cut and paste it into Proteus and sign it off once they are content with the programme.)

**All pre-recorded programmes (in-house and independent) must be listened to in full by both the producer and a BBC senior editorial figure prior to transmission.**

The following exceptions are allowed:

1. A number of programmes will be entered on the A&M Exemption List (agreed by the Controller and Director of A&M via Head Ed Standards). Programmes on the Exemption List may be approved by a senior editorial figure without being listened to again, but this must follow a conversation with the producer to confirm there are no possible issues. (Normally, no Independent productions will be considered for this exemption).
2. In circumstances where a Proteus form cannot be submitted, a conversation between producer and senior editorial figure must take place. An email note will then need to be submitted by the producer to the senior editorial figure, 'A&M compliance' and the relevant Controller, confirming approval for broadcast.

If a programme, or series, needs special compliance arrangements, these must be discussed with the Head of Editorial Standards, and, if agreed, these arrangements will be confirmed in writing.

## **Notes for clarification**

### **Repeats:**

#### Within 30 days

When a recorded programme is repeated, with no significant changes in terms of content and duration, and it was approved as "suitable for transmission on any platform at any time" on the compliance form, a second compliance form will not be required.

Re-listening to the programme will be at the discretion of the senior editorial figure or network. Topicality issues should be considered.

When a programme originally transmitted live is repeated, either in full or in edited (cut down) form, a compliance form must be completed, and signed off in advance of the transmission of the repeat by the producer, and senior editorial figure.

Re-listening to the programme will be at the discretion of the senior editorial figure or network.

When a pre-recorded/or live programme is repeated *with the addition of significant extra material*, a new compliance form must be completed, and signed off in advance of the transmission of the repeat.

Re-listening will be normally be required.

#### After 30 days

Any programme repeated more than 30 days after original transmission, will not need a new compliance form.

Re-listening to the programme will be at the discretion of the network. Topicality issues should be considered.

*The network must approve, on the compliance form, that the programme is suitable for transmission in the scheduled slot, and should check with the production department or supplier that no new issues have arisen.*

\*For **Radio 4 extra**, repeats from **Radio 4** and from the archive, please see the detailed compliance policy for that network.

### **Pre-recorded inserts on live shows:**

Only billed/scheduled programmes require a compliance form. Inserts into a live programme are the responsibility of the Producer/ BBC Senior Editorial Figure, and should be complied as part of a live TX.

### **Deferred "live":**

When there may be a very short time (e.g. under 60 minutes) between recording and broadcast of an OB, a BBC senior editorial figure, in addition to the producer, must be on site during recording. Before transmission, written permission from the Controller must be secured confirming that they are satisfied with the compliance arrangements in place.

**Daily Serials:**

Individual episodes of a daily serial require separate compliance forms for each episode. (This includes The Radio 4 Woman's Hour Serial).

Weekly omnibus editions of daily serials will also need a form even if they contain no new material other than that already broadcast in the daily editions. However, this should be confirmed with the Head of Editorial Standards, who may agree certain exemptions.

**Standby Programmes:**

Standby programmes should be labelled with an expiry date, at which time they should be signed off again or replaced. A word version of the compliance form should be completed and stored by networks in an accessible place and also sent to 'A&M compliance'. Programmes with significant editorial issues are probably not suitable as standbys.

**Programme Descriptions:**

These should be written in Proteus by the producer/production company and signed off by the BBC Senior editorial figure or network. These descriptions are published and sent to 3<sup>rd</sup> parties, and should be considered as BBC output.

**Podcasts and Downloads:**

When a podcast or download consists solely of material already broadcast, either in the form of a single programme or highlights, the process used in complying the original programme will also cover the podcast.

When a podcast or download includes content that has not been previously broadcast or is materially different to the original (e.g. rewritten or original link material), the podcast must be listened to in full by the producer and signed off by a senior editorial figure.

In all cases, the names of the producer and senior editorial figure must be entered in the Compliance text box of the Podcast maker, confirming the podcast or download is fully compliant with the BBC's Editorial Standards.

**AV – Recorded Video Content**

Video content published on BBC Online must be signed off before publication by an Interactive Editor, Senior Content Producer or, by agreement, the senior editorial figure responsible for the linear production. Compliance is logged via a compliance form. ( form available via link below).

Embedded video 'windowed' from a 3rd-party site must be viewed in full before publication on BBC Online. The production team must fill out a compliance form and escalate to a senior Interactive producer, or above, if there are editorial issues noted on the form.

**Compliance of other multiplatform content**

Content delivery has fragmented in the past few years over an increasing number of platforms, and so the scope of compliance arrangements has therefore increased in response. Details of all of A&M's multiplatform compliance policies and guidelines, and a link to the A&M Video Compliance Form, are available via this link:

[http://explore.gateway.bbc.co.uk/ami/ami\\_homepage/essential\\_information/am\\_multiplatform\\_compliance.aspx](http://explore.gateway.bbc.co.uk/ami/ami_homepage/essential_information/am_multiplatform_compliance.aspx)

## **Other Points**

### **Commissioning:**

At the point of commissioning, the commissioning editor must discuss the compliance arrangements for the programme/series with the producers. The level of risk should be assessed, and if necessary, the title should be added to the A&M high risk list. If there is very significant risk, it should be added to the pan BBC Managed Risk Programmes List. The latter action will need to be added to the contract if the producers are independents. Advice on the risk lists can be obtained from The Head of Editorial Standards.

### **Responsibilities:**

Even though a programme is signed off by a senior editorial figure, the producer must ensure that their programme is compliant, and take ownership of editorial issues. They must be fully across all relevant BBC editorial policies.

The senior editorial figure will be there to help decision-making and take joint ownership of the final decision to broadcast. They are ultimately responsible for the programme.

Independent Production companies will be responsible for delivering content meeting BBC standards, and will agree with the BBC who is signing off the content from the company. A BBC senior editorial figure will be assigned to ensure the content meets the required standards and sign off that content on behalf of the network.

The BBC might ask for specific people to be employed at the Independent to ensure compliance, but this will be on a case by case basis, and generally speaking, staffing will be a matter for the indie. (i.e. there is no automatic need for the indie to appoint an executive producer, unless the BBC require it)

### **Conflict of Interest:**

To prevent conflicts of interest, no members of production staff will be contracted at the same time to both the BBC and an Independent company, whilst making output for the BBC.

### **High Risk List:**

A&M keeps a High Risk list which aims to capture programmes where there are editorial or reputational risks thrown up by the content. If you think your programme should be on the list, consult the network compliance editor or managing editor. The information they will require will consist of programme details, the risks identified, and any mitigation which will reduce the risk. (e.g. a language warning when the programme contains strong language).

**Please consult Head of Editorial Standards A&M for any clarification, and/or to suggest a programme for the exemption lists.**