



BBC Editorial Guidelines submission

12 November 2018

1. Are the draft Guidelines clear and straightforward?

Yes.

2. Do they set out appropriate editorial standards for those making BBC programmes and content?

The draft guidelines set out important principles, provisions and protections. But the issue with the BBC has always been less with its official editorial policies, and more with its capacity to meet those standards in practice.

Despite a strong commitment to impartiality, the BBC's output has always tended to reflect elite opinion on a range of significant political issues. Political reporting has been strongly orientated towards and influenced by Westminster and the private press. Senior politicians, along with the financial sector, have strongly influenced reporting of economic issues, with alternative, and even mainstream, macroeconomic perspectives marginalised, whilst the BBC's reporting of issues of war and peace has similarly been shaped by the statements and perspectives of senior politicians and state officials, failing to adequately reflect a range of views, or to sufficiently interrogate official claims. Underpinning these editorial failings – which are evidenced in a large body of [scholarly research](#) – is a highly centralised and politicised editorial structure, as well as a range of formal and informal connections, and relationships, with the state and the broader British 'Establishment', as well as an editorial culture that is shaped by the class and educational background of staff.

The Media Reform Coalition has produced a set of [draft reform proposals](#) to address these issues. But since they are organisational, they – and the problems they are intended to address – are beyond the scope of this consultation. Nevertheless, there are a number of issues that could be better addressed in this draft document.

Referrals

The draft guidelines make extensive reference to the upward referral of editorial decisions on political matters. This longstanding BBC practice, intended to ensure fair and consistent policy, exposes those making BBC programmes and content to a politicised managerial hierarchy that is socially remote from the BBC's audiences. At best, this can lead to a risk averse culture across the BBC. At worst, it allows external interests to indirectly influence BBC editorial culture. Both interfere with the BBC's capacity to meet its public interest obligations as outlined in the draft guidelines.

A more effective approach than a hierarchical system of referrals would be for editorial judgements to be made (in accordance with corporate wide editorial policy) at the programme making (or commissioning) level, with the role of senior editors limited to the clarification of general matters of editorial policy in circulated and published documents. This would strengthen the independence of BBC programme makers, protecting them from internal interference, and would increase the transparency of the BBC's editorial processes.

External interests

The draft guidelines place considerable emphasis on the BBC's independence from external influence. This is an important principle that needs further strengthening.

A major oversight in the draft guidelines is the potential for private news organisations to influence BBC programmes and content – as has been suggested by a number of [scholarly studies](#) and identified as an issue by a number of current and [former BBC staff](#). The draft guidelines state that material 'supplied by third parties needs to be treated with appropriate caution, taking account of the reputation of the source', but they make no mention here of newspapers or other news organisations. Indeed, it is notable that whilst the draft guidelines make over seventy references to charities and campaigns, newspapers are mentioned only once, and there is no acknowledgement of their agenda setting function in BBC political reporting.

The UK press is politically partisan and many titles have poor records on accuracy (as reflected in the low level of trust recorded in polling) and have interests that if anything are much more likely to be at odds with the BBC's public interest obligations than the charities and campaigning groups that receive significant attention in this draft document. The guidelines should, therefore, include an explicit statement that all political stories originating with private news organisations must be treated with the same caution as other third party material. There should also be an explicit statement that private media organisations should not be treated as an indicator of public opinion or sentiment.

Another significant oversight in the draft guidelines concerns the role of think tanks as sources of news and opinion in BBC programmes and content. Think tanks produce research reports that receive attention in BBC news reports, and provide experts and 'pundits' for BBC news and current affairs programmes. Think tank personnel would presumably therefore fall under the guideline's stipulations for contributors' affiliations, which cover academics, journalists, researchers and representatives of charities. Think tank personnel should be explicitly included here, and access to BBC programming should be conditional on transparency about a given think tank's sources of funding. A statement as to the broad political orientation of a contributor is not enough. Transparency about potential conflicts of interests are required to ensure access to trustworthy news and information and any think tank failing to meet such standards should be prohibited from any involvement in BBC content.

Politics, public policy and polls

A longstanding problem with the BBC's political reporting has been its focus on political personalities and party political competition rather than substantive issues of policy. This leads to a poor public understanding of important questions of public policy, and to the neglect of significant strands of thought unreflected or under-represented in the formal political system. Both may be associated with political disengagement.

The guidelines should therefore explicitly stipulate that when it comes to politics the BBC should focus primarily on questions of policy, with party political process and personalities incorporated but usually not foregrounded in BBC content. A stipulation that so-called 'horserace' reporting of elections or referendums should be avoided should be included for the same reason.

Vox Pops

There is [evidence](#) that the use of so called 'vox pops' in political reporting tends to reflect the political assumptions of journalists, rather than the actual balance of public opinion as gauged by polling. The section on 'vox pops' in the draft guidelines should include a stipulation that 'vox pops' should not be used to indicate the weight or breadth of opinion on a given issue, but that there should nevertheless be some effort to ensure that they are broadly reflective of weight of opinion.

Racism

Another area of significant oversight in these draft guidelines is racism. There are stipulations around the use of ‘distressing language’ and the portrayal of ‘discriminatory treatment or language’ in BBC programmes, and against ‘careless and offensive stereotypical assumptions’. Racism, however, is nowhere mentioned, despite this being a matter of significant public concern and editorial controversy. The guidelines stipulate that due impartiality ‘does not require absolute neutrality on every issue or detachment from fundamental democratic principles’. They should include a specific stipulation that this applies to racism, and that the treatment of racist ideas and movements in BBC programmes should take into account the interests of BAME licence fee payers and the BBC’s duty under the Charter to ‘represent and serve the diverse communities’ of UK, and give ‘particular regard to the need to reflect underrepresented communities’. This should mean, for example, that proponents of racist views should not be offered airtime without appropriate context and rebuttal.

3. Do they properly address the BBC Charter duty to form partnerships with external organisations to produce content?

There is very little in the draft proposals that substantively addresses this duty, and a good number of provisions that will likely hinder the BBC’s capacity to develop public interest partnerships with charities, campaigning groups and other civil society organisations. Without this problem being addressed, the BBC will likely focus largely on commercial partnerships with media multinationals. This would hinder its capacity to adequately represent the diverse communities of the UK and a broad range of individuals, views and arguments.

4. Do they sufficiently reflect the changes in the media landscape since the last review in 2010?

Addressing the significant challenges resulting from changes in the media (and political) landscape up to and since 2010 will require organisational change at the BBC that is beyond the scope of this consultation. The fact that these draft guidelines make very little mention of digital technologies is regrettable. This reflects the failure of the BBC and policy makers to fully utilise digital technology in the public interest, to develop new participatory means for communications, and models of commissioning and editorial decision-making.

5. How well do they reflect audience expectations of the BBC?

Whilst the draft guidelines are reflective of audience expectations on questions of accuracy, issues of [due impartiality](#), [independence](#) and transparency, which underpin the public trust in the BBC, need to be much more substantively addressed alongside a programme of organisational reform (as has been outlined in the Media Reform Coalition’s Draft Proposals on BBC Reform). In addition to the aspects highlighted above, public transparency around programme makers’ declarations of personal interests will be required to ensure public trust is maintained as editorial decision-making is devolved to the programme level.