



CONTENT COMPLIANCE PACK

CONTENT COMPLIANCE

POLICY AND GUIDANCE FOR ALL SKY CONTENT

<https://corporate.sky.uk/about-sky/other-information/commissioning-and-ideas-submission/production>

SKY CONTENT COMMISSIONED PROGRAMMES TO BE DELIVERED HD 5.1 DOLBY E

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5/3/24

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LINKS TO DOCUMENTS REFERENCED IN PACK:

- 1. Contributor and Data Protection Checklists:**
 - a. Entertainment**
 - b. Docs & Crime**
 - c. Kids**
- 2. Intimacy on Set Guide - Nudity & Sex Scenes**
- 3. Online & Social Media Guide for Contributors/Talent**
- 4. Best Practice – Child Performance & Licensing by Local Authorities in England (Feb 2015)**
- 5. PACT’s Guidance for Filming with Children and Licensing differences across the UK (2015)**
- 6. Surreptitious/Secret Filming Form 1**
- 7. Surreptitious/Secret Filming Form 2**
- 8. Door Stepping Form**

1: CONTENT COMPLIANCE CONTACT LIST

A compliance contact will always be allocated to each individual production, please liaise with your Sky production contact.

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LEGAL TEAM

Matthew McKenzie	Head Legal Counsel	matthew.mckenzie@sky.uk	07850 733 238
Paul Herbert	Senior Counsel	paul.herbert@sky.uk	07866 010 119

2: OUT OF HOURS - CONTACT LIST

THE HEAD OF COMPLIANCE/ SENIOR MANAGERS AND ONE OF THE MANAGERS ARE ALWAYS ON CALL ACROSS THE WEEKEND AND BANK HOLIDAYS - dl-compliancemanagers@sky.uk

MEMBERS OF THE COMMISSIONING TEAM ARE ALSO AVAILABLE OUT OF HOURS FOR ANY PRODUCTION THEY ARE WORKING ON WHEN GIVEN PRIOR NOTICE.

Where to find us:

Postal: Sky UK | Neighborhood 1.8 | Sky Central | Grant Way | Isleworth | Middlesex | TW7 5QD

Visitors: Visitors Reception | Main Gate Sky Campus | Grant Way | Isleworth | Middlesex | TW7 5QD

3: COMPLIANCE AND BROADCASTING GUIDELINES

Under the terms of Sky's Commissioning agreement, you are contractually obliged to observe and comply with all applicable laws, statutes, rules and regulations and requirements of all governmental bodies at all times throughout production.

Sky expects producers to comply with the terms of the [Bribery Act 2010](#) (the "Act"). If Sky discovers or suspects that any producers have committed bribery Sky will be compelled to take appropriate action.

All programme(s) delivered to Sky for transmission on Sky platforms should adhere to Ofcom and all other broadcasting guidelines, including Sky's Content Compliance Pack and Production Guidelines. It is the responsibility of the producer to ensure that the codes and guidance notes issued by Ofcom and all legal and compliance issues have been dealt with thoroughly prior to delivery and that the Silvermouse form has been fully completed and submitted.

The [Ofcom Broadcasting Code](#) can be found on the Ofcom website:

<https://www.ofcom.org.uk/tv-radio-and-on-demand/broadcast-codes/broadcast-code>

Before production begins you will be assigned a Compliance Contact and they will attend the Start Up Meeting and be your point of contact for all compliance matters. At green light stage you will be sent a copy of one of our genre specific **Contributor**

& Data Protection Checklist – this document **MUST** be filled out and sent through to the compliance, production, and commissioning departments prior to your Start Up Meeting. For ease there is a link at the front of this pack in the **Content** section to all 3 versions of this document.

Where under any production arrangements personal data is captured or disclosed to Sky it will be processed in accordance with Sky's Privacy Policy.

Any editorial or compliance changes required prior to transmission should be undertaken at the expense of the production company and in good time.

4: FLASHING IMAGES

As a broadcaster Sky must take precautions to maintain a low level of risk to viewers who have photosensitive epilepsy (PSE). Where it is not reasonably practicable to follow the Ofcom guidance, for example during 'live' performances and where broadcasters can demonstrate that the broadcasting of flashing lights and/or patterns is editorially justified, viewers must be given an adequate verbal and also, if appropriate, visual warning at the start of the programme and/or at the beginning of the relevant part of a programme.

Where live broadcasts are under the control of the production team it is expected that they will try to find workable solutions to minimise and or mitigate any potential harm to viewers from flashing images, as well as including relevant warnings where necessary. If a 'live' programme is subsequently re-broadcast appropriate edits must be made to remove and/or limit any flashing image-related issues prior to retransmission.

As part of the contractual obligations of **all** production companies Sky expects an appropriate flashing images/Harding test to be carried out on **all master material prior to delivery**. A copy of the test report confirming that the programme has passed a Harding test should be delivered with the master. A further test will be carried out as part of the QC process at Sky and the production company will be alerted if any outstanding issues are found regarding flashing images. If flashing images are discovered, it is the production company's responsibility to rectify these issues. Sky's PSE obligation and testing details are available in the [technical delivery standards](#) link below on the production pack:

<http://dpp-assets.s3.amazonaws.com/wp-content/uploads/specs/sky/TechnicalDeliveryStandardsSky.pdf>

The relevant section is from 2.9.1 onwards.

5: TX MASTER REDELIVERY POLICY

There will be a charge incurred for redeliveries of content where there is no valid compliance or legal reason for doing so and this will be reflected in your commissioning agreement. The aim of this is to deter productions from redelivering for minor reasons (i.e., spelling mistakes) and to ensure masters are properly checked for mistakes before delivering.

Charges:

There will be a fixed fee of **£700** charged by Compliance in the first instance of a resupply that does not qualify for an authentic legal or compliance reason – This charge will depend on how much work has been undertaken on the original delivery. (See the "stages in process" criteria where charges will take effect on the following page).. **NB After the first redelivery for each subsequent resupply request around the same content there will be a 50% uplift attached.**

For example:

- *S1 Ep1 of a new Sky Commissions Drama is redelivered as it features a misspelled end credit. The episode has already been processed and signed off by the compliance team – **The charge will be £700.*****
- *The same episode is then redelivered for the same or a different issue that does not qualify as a legitimate compliance or legal reason. This will incur a charge of £1050 (£700+£350)*
- *The exception to this would be Kids commissions which will only invoke the 50% uplift should an entire series be redelivered, rather than individual episodes.*

****Please note that QC also charge a redelivery fee. This will follow the same criteria as above with an initial recharge fee of £300.**

If a redelivery is required, it must be agreed by all parties set out within the Redelivery Policy detailed below before being agreed with the production company. Once agreed, the following steps below must be followed:

GREEN:	STAGE IN PROCESSING:	VALID REASON FOR REDELIVERY WITH NO CHARGE:	MUST BE SIGNED-OFF BY:	COMPLIANCE/QC COSTS:
	A. QC Reviewed and Failed B. Currently being complied but not yet finished or any Eps uploaded to VOD platform. C. Redelivered before we get to work on it.	A. Legal issue B. Compliance issue C. Credit issue – if related to contractual obligation.	Production Contact & Commissioning Exec.	No charge from compliance or QC. We will accommodate where possible.

AMBER:	STAGE IN PROCESSING:	VALID REASON FOR REDELIVERY WITH NO CHARGE:	MUST BE SIGNED-OFF BY:	COMPLIANCE/QC COSTS:
	A. QC Passed B. Delivered and complied, not yet TX'ed and/or uploaded to VOD.	A. Legal issue B. Compliance issue C. Credit issue – if related to contractual obligation	Production Contact, Commissioning Exec. & Compliance Exec	Compliance: Charged £700 per file + 50% Uplift for any subsequent deliveries. QC: Charged £300 per file + 50% Uplift for any subsequent deliveries

RED:	STAGE IN PROCESSING:	VALID REASON FOR REDELIVERY WITH NO CHARGE:	MUST BE SIGNED-OFF BY:	COMPLIANCE/QC COSTS:
	A. All episodes delivered, complied, uploaded to VOD and ready to TX and ready for Boxset. B. Episode Already TXed and on VOD	A. Legal issue B. Compliance issue C. Credit issue – if related to contractual obligation.	Production Contact, Commissioning Exec, Compliance Exec & Channel (when required)	Compliance: Charged £700 per file + 50% Uplift for any subsequent deliveries. QC: Charged £300 per file + 50% Uplift for any subsequent deliveries

6: ADULT AND UNDER 18S CONTRIBUTOR/TALENT POLICY & GUIDANCE



CONTRIBUTOR/TALENT POLICY & GUIDANCE FOR SKY CONTENT

ADULTS AND UNDER 18'S PARTICIPATING IN PROGRAMMES

Charlotte Gaeta - Senior Content Compliance Manager
Isabelle Weerawardana-Odusanwo - Content Compliance Executive - Commissioned Content

30/03/22

A: Safeguarding the Welfare of Adults, Young People and Children

The interests and safety of contributors to Sky content, both paid and unpaid, must take priority over any editorial requirement, whether they are adults, young people or children. Vulnerable adults, young people and children are especially vulnerable and extra measures will be required to ensure their care whilst preparing for, taking part in and during and after the transmission of any Sky content they are involved in. There are many aspects to safeguarding the welfare of children and young people, ranging from child protection to keeping their personal details safe. They apply whether we are making a film with a child or receiving user-generated content from young people. These guidance notes give advice to help to ensure duty of care for **all** our contributors and actors.

In relation to under 18s productions must follow all Ofcom Codes and Guidance on the participation of children in TV programmes: <https://www.ofcom.org.uk/tv-radio-and-on-demand/broadcast-codes/broadcast-code/section-one-protecting-under-eighteens>;

Please highlight what steps you are taking to ensure your production is compliant.

B: Child Protection Policy

1. Sky has a Child Protection Policy (*for children and young people under eighteen*) with which all Sky staff must comply. You will find the link to this document at the front of this pack in the **Content** section for further information **Sky's Safeguarding Policy**.
2. Each Sky division has a **Child Protection Representative** who has special responsibility for implementing the policy in their area. If you need advice or support regarding child protection please contact your Sky production and compliance contacts who can put you in touch with the relevant person.

It is also advisable that independent production companies have a named manager or member of production responsible for child protection referrals and advice.

We expect all productions involving under 18s to have their own child welfare policy in line with Sky's Child Protection Policy, Ofcom Regulations and Local Authority Child Licensing Rules; which you should share with your compliance contact at the earliest opportunity. For all productions with under 18s involvement a specific named member of production should be the main point of contact and be responsible for all child welfare elements.

All contributor details including biogs, personal details etc. must be kept on an encrypted and password-protected document/file and only circulated to specific staff who require this information, for the purposes of data protection compliance. These files should be deleted under advisement from production and following proper data protection guidelines.

C: Self-Declaration Forms & DBS (Disclosure and Barring Service in England, Wales & Disclosure Scotland & ROI) Checks

1. Self-Declaration Forms:

Production companies producing Factual/Documentaries, Factual Entertainment and Contributor-led Entertainment programmes or series for Sky should request all potential contributors to fill out a self-declaration form prior to their inclusion in any filming. This can be a standalone form or be added to your contributor research form but must be signed and dated by the contributor and include the following wording:

Self-Declaration:

I declare that:

- I do not have any unspent convictions, with the exception of road traffic convictions that have not resulted in a court ordered disqualification.

and/or

- I have never been subject to any disciplinary action or sanction relating to vulnerable groups

(This means if your name is on the Sex Offenders Register or you are otherwise known to the Police or any Local Authority Social Services Department, or any employer, as being an actual or potential risk to vulnerable groups.)

I consent to this personal data being processed and kept by (production company name) solely for the purpose of child protection and the control of health and safety risk in accordance with the Data Protection Act 2018 and the GDPR (General Data Protection Regulation). This information will only be disclosed on a need-to-know basis to specific employees within (production company name) and Sky who need to be made aware of these details. (production company name) reserve the right to verify the information you have given on this form. To make a false declaration is a serious offence and may be referred to the appropriate authorities. If you are unable to make this declaration, you must inform your production contact as you may not be able to work on this programme. This is in pursuance of (production company name's) Child Protection Policies which are available on request.

This form and any copies will be retained under advisement from production and destroyed following proper data protection guidelines.

I confirm that all information provided is accurate, truthful, and not misleading.

Full Name
(Block caps):

Signature:

Date:

Once the final selection or casting process has taken place Basic DBS (or Disclosure Scotland) checks should be carried out on all your main contributors prior to any filming taking place. See below in section C2.

2. DBS (Disclosure and Barring Service in England, Wales & Disclosure Scotland & ROI) Checks

Frequently contributors working on Factual, Factual Entertainment and Contributor-led Entertainment programmes or series for Sky will need to have DBS/Disclosure & Barring checks carried out on them before they have been fully confirmed as taking part in your production.

Depending on the nature of the production and the likelihood of working with children, there may be a need for staff to have DBS checks before being engaged to ensure they are suitable to work with and around children. It is important not only to think about staff who will be recording or filming with children, but any others who might interact with children on the project, such as those who will have access to children's personal data. If you are unclear as to whether your production staff or crew will need to have DBS checks carried out prior to filming, please speak to your Compliance Contact who can advise you.

D: Drama & Comedy Productions: Background Checks for Supporting Artists (SA's) working on Productions involving children

Pact, together with the BBC, Channel 4, Channel 5, ITV and Sky are committed to safeguarding children working in our industry. As part of the background checks producers already undertake for production staff and freelancers, additional measures to protect children must now be implemented to ensure that any Supporting Artists (SAs) they supply or contract through a casting agent to work on productions involving children (in either speaking or non-speaking roles) must have obtained a basic disclosure certificate which shows that the SA has no unspent convictions for sex offences.

What is a Basic Disclosure Certificate?

A basic disclosure certificate is a document containing impartial and confidential criminal history held by the police that can be used to make safer recruitment decisions. The basic disclosure document will provide details of an individual's unspent criminal convictions, or state that they have none.

- <https://www.gov.uk/request-copy-criminal-record> - This link allows you to apply for a basic DBS check for England and Wales.
- You can apply to Disclosure Scotland and AccessNI (Northern Ireland) to provide basic disclosure certificates for Scotland and NI.
 - <https://www.mygov.scot/basic-disclosure/apply-for-basic-disclosure/>
 - www.nidirect.gov.uk/index/information-and-services/crime-justice-and-the-law/accessni-criminal-record-checks/accessni-checks.htm

What is a production involving children?

It is the producers' responsibility to inform agencies that a particular production involves children. If children are engaged on a production in any way and at any time the producer must ensure SAs have had relevant background checks.

If you have decided, it is not necessary to have all SAs disclose their criminal background by way of a Gov.UK/Disclosure Scotland/AccessNI certificate you must discuss your reasoning with your Commissioning Executive.

How are agencies being informed of their obligations?

The participating broadcasters have updated their contractual documentation with agencies to inform them of the relevant obligations.

It is also recommended that producers include the following wording as a warranty within their contracts with any agencies:

Agencies must ensure that:

- *A Basic Disclosure certificate has been obtained from Gov.UK/Disclosure Scotland/AccessNI for every SA who is to be supplied to work on any programme or film which involves working with children at any stage during the production. The Agent will not provide any SA who has unspent convictions for sexual offences as contained within the Sexual Offences Act 2003.*
- *A new Basic Disclosure Certificate is provided by SAs every 18 months. If within the period between obtaining Basic Disclosure Certificates an SA is convicted of an offence under the Sexual Offences Act 2003, the Agent must be informed of this by the SA so that the Agent will not supply the SA's services to a producer.*
-

Producers are reminded that this additional safeguard does not replace the existing measures in place to protect children and their wellbeing whilst in their care as part of any performance licence and duty under the Ofcom Broadcasting Code.

Please direct queries to Annette Atanda at annette@pact.co.uk

E: Contributor and Data Protection Checklist – Mandatory

Sky expects **all** production companies working on Non-scripted content to complete and email Content Compliance and their Sky Production contact the relevant **Contributor Checklist for Productions and Data Protection** as part of their contractual obligations to Sky (*you will find the relevant link at the front of this pack in the **Content** section for all 3 versions of this document. - Ent & Arts, Factual & Crime, Kids*). This should be done at the pre-contract stage or earlier to ensure that all relevant contributor checks have been considered and discussed with Sky and the right funding, pre-production time and staffing levels are put in place before contracts are signed off. This document must be sent through to your production and compliance contacts **no later than 3 days prior to the start-up meeting** for your production. **Your production contract will not be fully signed off until these elements have been fulfilled.**

Sky now includes both mental health and emotional risk alongside physical risk within their overall risk assessment; to help with this process please ensure that a copy of your **Contributor and Data Protection checklist** is sent through to Sky's Health and Safety (healthandsafetyteam@skyglobal.onmicrosoft.com) department as this will help them get a clearer picture of the safeguards you are putting in place.

F: Informed Consent - Release/Consent forms

The requirement to obtain *informed consent* is a key principle of the Ofcom rules and Sky's Editorial Policy. All contributors must be made aware of the nature of the programme, the nature of their contribution and how it will be used in the programme; including the longevity and repeat nature of future transmissions.

Each production is different, so it is vital that Producers raise any special situations or any foreseen difficulties in connection with securing releases prior to production. Consent should be obtained in the form of a written release. An appropriate **CONTRIBUTORS RELEASE FORM** should be used which complies with the requirements of the Sky commissioning agreement as well as the specific requirements of the production, in accordance with advice from a suitably qualified production lawyer.

A shorter release form may be used in certain circumstances e.g., for filming and recording an individual, by way of interview or otherwise, whose contribution is not featured significantly in the programme but who is clearly not a random and anonymous member of the public. This will vary for each individual production and must be discussed with Sky before filming. Sky acknowledges that due to the demands of production there may be limited circumstances where a written release cannot be obtained but consent is required. The Producer should use every effort to obtain a written release before or after filming but, where this is not possible; a **VERBAL RELEASE TO CAMERA must** be obtained. This should be time and date stamped. The Producer should note that although at the time of filming this may seem an attractive alternative to a written release, a written release form is always preferable, *furthermore Sky will require the Producer to keep the footage containing the verbal release for the period of Sky's rights to the programme so that they can be reviewed when necessary.*

G: Parental & Child Consent

Parental consent **must** be obtained for all under 18s. If the child or young person's parents are separated parental consent must be obtained from both parents if they have joint custody. If only one parent has custody proof should be provided to this effect as well as the parental consent form being signed and best endeavors should be taken to inform the other parent of their child's involvement in the programme, unless there are child welfare issues that preclude this. An appropriate **PARENTAL CONSENT RELEASE FORM** should be used which complies with the requirements of the Sky commissioning agreement as well as the specific requirements of the production, in accordance with advice from a suitably qualified production lawyer.

When seeking **informed** consent from a child, all the information should be given in a way that can be easily understood by the recipient. An appropriately pitched explanation of the proposed contribution should be given. In pitching your explanation, think carefully about the age and maturity of the child in question. Sometimes it can be helpful to ask the child to say back to you what he/she understands his/her participation would involve, checking they have understood. Make sure the child does not feel pressurised to agree - let them know it is okay to accept or decline. (*Children often see adults as authority figures with whom they cannot disagree*). Also look for non-verbal signals that may express what a child is really feeling about participating. Personal consent forms with age-appropriate language should be used for children over the age of 11 and on-camera consent should be obtained from younger children on an ongoing basis to ensure they are happy to be filmed on each occasion.

With babies and toddlers, it may sometimes be appropriate to consult an independent expert to discuss the child's involvement.

In addition to verbal communication, an easy-to-understand confirmation letter could be addressed to both the child and parent. We generally recommend suitably worded briefing documents to be used in most instances - one for the child, in language that they will understand and one for the parent. This will be necessary if there are any surprises planned for the child, as parents should be made aware of these. Any likely consequences of the contribution - both negative and positive - should also be made clear to both parties.

Briefing documents/confirmation letters to parents should also include:

- The nature and type of programme they are taking part in;
- What they will be required to do or take part in for the programme and what their contribution will be;
- How their contribution will be featured within the programme;
- Practical details;
- Health and safety details;
- Inform parents that there is a child protection policy which staff must follow. Staff should not ask for children's personal details or offer their own details. Sky/Independent production company contact details should be provided

by staff, e.g., *programme email addresses or phone numbers, not individual email addresses* - see "Appropriate behaviour with children and young people" - Section P further on). It should also be made clear that staff should not be placed in a caring or supervisory position. (If this is to happen there has to be express agreement of all parties in advance of the visit).

- Describe how Sky/Independent Production Company protects personal data.

H: Keeping Contributor's Details Safe

Part of our duty of care provisions for our contributors - whether they are adults, young people or children - involves keeping their personal details safe during and after filming. **All contributor details including biogs, personal details etc must be kept on an encrypted and password-protected document/file and only circulated to specific staff who require this information, for production or compliance purposes.** These files should be deleted under advisement from production and following proper data protection guidelines. It may be appropriate to ask relevant members of staff to complete a basic DBS check if they are handling personal data.

When filming with contributors in or outside their homes or places of work etc. care must be taken to ensure that we don't inadvertently create any privacy or safety issues for contributors by showing details that can identify their exact address or any other personal details to the viewer (jigsaw effect). House numbers, car registrations and road signage should either not be visible on camera and/or masked in edit. Attention should also be given to what can be seen in the back of and periphery of shots inside people's homes to ensure that no personal details are visible, such as address details on a postcard or letters on the fridge etc.

I: Identifying Children in our Output

In relation to filming with young people and children, as well as following the same procedures for adults, we would advise that young people and children are only identified by their first name with details about their school or college etc. being kept to a minimum and/or not included unless there are editorial reasons for doing so. Again, this is to ensure there is no opportunity, through the build-up of information given about them, *'the jigsaw effect'*, by which viewers would be able to identify where they go to school or where they live.

Even when the story is non-controversial it is likely to be more appropriate to name a child only by their first name and to give the name of the large town they live in or near rather than more specific details. However even this may be too much information in some circumstances (*for example if the child has an exceptionally distinctive first name, it is advisable that their location should not be revealed*).

In many non-controversial and non-sensitive cases, there may also be other important reasons not to identify a child. An example could be where you are filming in a school and one child should not be shown because they and their parent have fled from an abusive partner. If the child was filmed, their location could be revealed to the ex-partner. Advice is available from the Content Compliance team at Sky regarding these matters.

If you are thinking about giving out more details about a child, for example their surname in a story where the child is already publicly known (*a sports star for instance*) or where they have won an award and deserve recognition, this should be considered and - where appropriate - should be discussed as part of the consent process.

Naming the contributor's school can make a child locatable by those who might wish to cause them harm. It is not usually advisable to name the school unless it is part of the story, for example where the school has done something interesting and becomes the main focus of the piece. Where a school is named, consider limiting other information that is given out.

Think carefully about when to film children in school uniform. Even if the name on a school jumper is not legible on screen, a distinctively coloured uniform may identify the school to that area's inhabitants.

J: Children at Risk

If as a member of production you have a concern that a child or young person is at risk of harm you should refer this to your nominated manager who can flag this to the relevant authorities.

However, if you suspect a child is at immediate risk of harm and the nominated manager cannot be contacted immediately, the police should be alerted straight away.

If you become aware of any incident of suspected "grooming" online, you must refer it promptly to your Sky Production and Compliance Contacts who can put you in touch with Sky's online team for help and advice. There is detailed advice about identifying suspected "grooming" online and how to react in [Sky's Safeguarding Policy](#) (You will find the link to this document at the front of this pack in the **Content** section for further information.)

In a school environment, Sky's Child Protection Policy states that where Sky staff become concerned about the welfare of a child, they will share that concern with the school's designated child protection teacher, who will follow locally agreed procedures. If it is felt more appropriate, any issue can be referred through the relevant Sky child protection nominated manager.

K: Data Protection

We must keep **all** contributors' personal data safe for their protection and abide by the Data Protection Act. **Sky's Data Protection guidelines outline the main requirements, including password protection etc. Please speak to your Production Contact for further information.**

Remember to consider all points at which contributors' data need to be kept securely. For example, think about what information goes into a script and who might have access to that script, or if user-generated content or correspondence is being physically taken to a studio or public area, mask the contact details. Any printed hard copies should be collected after filming and destroyed safely to ensure there are no data breaches. **All contributor details including biogs, personal details etc. must be kept on an encrypted and password-protected document/file and only circulated to specific staff who require this information, for the purposes of data protection compliance.** These files should be deleted under advisement from production and following proper data protection guidelines.

Sky's Data Protection Team is able to advise Sky staff on data protection issues; if you have any data protection queries, please contact your Production Contact in the first instance and they can put you in touch with our in-house Data Protection team.

L: Intimacy on Set/Nudity & Sex Scenes – Safeguarding Talent

As a broadcaster Sky believes the physical and mental wellbeing of its talent is paramount and wants to ensure that no one working on our productions is ever made to feel unsafe, exploited or mismanaged during casting or on set. Whenever a performer needs to take their clothes off or perform a simulated sex act on camera, they are inherently vulnerable, and productions have a responsibility to manage situations like this in a considered and respectful way.

Risks to performers can include:

- Intimidation to participate (bullying)
- Body shaming and ridicule
- Gender-based derision and humiliation
- Reputational damage
- Objectification
- Stalking and obsessive behaviours from others
- Unwanted physical contact
- Molestation
- Physical assault
- Sexual assault

Producers and directors can play a huge role in setting a professional tone on set and in helping to create a more positive and collaborative working environment. In context with this Sky is providing productions with clear and practical 'best practice' guidance on filming scenes of nudity and simulated sex, so that actors and directors can feel safe and free to make creative and entertaining content. You will find the link to Sky's [Intimacy on Set Guidelines](#) at the front of this pack in the **Content** section for further information.

M: Evaluating the Impact of a Contribution on a Contributor

Even when you have secured 'informed consent' and/or 'informed parental consent' from a contributor either adult, child, or young person - under 18, you must consider carefully the impact and possible consequences of any material which involves them, both during the production process and once the material has been broadcast.

You should think about the story you want to tell and how to do it in a way that is not detrimental to them either at the time, or afterwards and consideration should be given about what is appropriate to put into the public domain. You should pay particular attention to the expectations of privacy of people under eighteen (*under 18s*), and those who are vulnerable. Care here is particularly required as children and young people are unlikely to recognise the potential consequences of sensitive or controversial information about them being broadcast. They may share quite intimate revelations with us, not being aware of any possible repercussions if this information became public. A "young person" is currently defined as anyone in full time education, in an apprenticeship or in part- time education as well as working up until the age of 18 (*government guidelines on school leaving age in the UK*). This means, in England, anyone in the education system between the ages of 16 and 18 years e.g., on a college course, apprenticeship or sixth form falls within this category. In Scotland, Wales, and Northern Ireland the school leaving age is 16yrs at the end of the school year.

Think carefully about each child's privacy - you should pay particular attention to the expectations of privacy for under sixteens (*under 16s*). Parental and child informed consent should normally be obtained if a contributor is to be featured in our output in a way that would infringe their privacy:

<https://www.ofcom.org.uk/tv-radio-and-on-demand/broadcast-codes/broadcast-code/section-eight-privacy>

Productions must also consider whether it would be helpful to seek advice from an appropriately qualified professional, such as a counsellor, psychologist or child psychologist - someone who doesn't have a vested interest in the contributor's participation - depending on the nature of the programme and the contributors contribution or role.

On some projects it may be appropriate to seek professional advice, such as a psychologist or child psychologist, during the selection process for actors or contributors to assess whether an adult, young person or child has hidden vulnerabilities or is emotionally robust enough to cope with their proposed involvement. There may also be productions where specific professional guidance is required from organisations or individuals to assist with language/terminology used, welfare, potential sensitivities, or trigger issues. For example, in relation to sexual orientation, medical, emotional or race related subject matter. The employment of such experts should be discussed as part of the **Contributor and Data Protection Checklist** (*Documentaries & Crime / Entertainment & Fact Entertainment / Kids*) considerations at the pre-contract stage of production. The involvement of a psychologist will help to ensure proper considerations are taken over the welfare of contributors throughout the production process, from filming to TX and post transmission. Their advice and guidance can prove invaluable to production teams especially with contributor-led content, helping to ensure best practice and that duty of care protocols are in place and followed.

In all cases it is very important to consider how a contributor's involvement in the programme might affect the individual, especially on sensitive or controversial projects. Think about their health, emotional and physical, background and educational circumstances.

With young people and children involved in content about sensitive and/or controversial material, in addition to any expert opinion, it can be advisable to speak to the Head Teacher of a child's school for an opinion, or someone who knows the child well, as to whether it could harm the child if they become involved or are identified in the project. If the child does take part and the Head Teacher knows about it, the Head can also keep an eye out in case there are any issues post-transmission in the school environment.

There may be instances where, despite the fact a contributor has given informed consent it is not advisable for them to participate. Serious consideration and discussion should be undertaken with Sky's Compliance and Editorial teams to assess whether to proceed with a contributor if you have any concerns that this might be the case.

Different genres and formats present different challenges regarding duty of care to contributors.

Where a contributor is portrayed negatively in a factual or entertainment piece, we need to think about filming their redemptive journey - if there is one; this is particularly important to consider when it comes to young people and children as they are likely to be more affected by reactions to their portrayal. There may be some cases with no positive story to tell and we should consider whether it is in the interests of the adult or child to broadcast their contribution at all. The more constructed the format, the greater the responsibility we have to our contributors, especially children and giving them a chance to redeem themselves in the story will help this.

Clearly, we must not mislead the audience - we should tell true stories - but we must not do this at the expense of the adult or child contributor. Their welfare is more important than making a film about them.

Where conflict or highly emotional situations may be involved, big surprises could cause harm or distress, especially in live or as-live programmes. (*An example might be where a child is unexpectedly reunited with an absent parent, live on air.*)

Consider the impact on young actors and contributors of witnessing or participating in activities that might have a negative psychological effect on them. For example, think about the impact of a child actor on taking part in a murder scene or in dramas concerning paedophilia or prostitution. We have a duty to obtain children's informed consent, but it is important to consider what details should be given to the child about the full nature of the drama and what language should be used to describe it, in order not to cause distress, yet allow them to make an informed decision. The age of the child and nature of the content must

be considered. Think carefully about what is appropriate for a child to witness or participate in and what psychological repercussions this could have on the child. In dramas it may be appropriate to shoot elements of a scene in such a way that a stand-in can be used in place of the child and reverse shots of the child added later to help mitigate these elements. Young children have difficulty understanding what is "acting" and what is "real" so productions must evaluate how their involvement could affect them and take steps to protect their wellbeing.

To help a child actor differentiate between acting and real life it is useful to explain the technical aspects of how things are done. For example, in an adult television drama where a child actor might witness some violence, you can show them that certain props are fake so that the actor is not hurt - anything to help them separate reality and artifice.

You should consider what repercussions there may be to a young actor in a strong drama after it is broadcast. For example, even if a drama transmits post-watershed, adults in their community may have seen it and rumour may filter down to their children who could bully the young actor at school. Don't forget to liaise with experts, if appropriate, and make sure the parents are fully aware of the content and have seen a script before agreeing to the child's participation. Keep them posted if things change materially between agreement and recording and recording and broadcast.

Another concern is where contributors or actors may emulate an activity which is controlled in a production but which in real life would be dangerous for them to participate in. A key concern for makers of content for children should be to avoid the dangers of imitative behaviour both for the contributor and the audience.

Children involved in competitions or game shows may become stressed or upset if not cared for appropriately, so you should make plans to minimise stress and support the contestants.

You should also consider how to make sure that the audience is aware that you have not been cavalier about the welfare of contributors or actors. For example, in editing entertainment programmes to give the impression of added jeopardy, it is easy to give the false impression that children have been put under extreme stress, which would be misleading to an audience. It may be appropriate to communicate to the audience that a contributor's welfare has been safeguarded. This could be done through voice over within the script or via a graphic prior to the credits.

It is good practice, and in some sensitive or controversial cases strongly advisable, to document how children and young people are cared for on a production as evidence of how they were treated. For example, you can keep records of schedules and briefing letters, correspondence, concerns raised and addressed, and the procedures put in place.

Aftercare is very important for all contributors, especially with content that covers sensitive or controversial content. If a contributor's contribution has evolved during postproduction, it may be advisable to let them know prior to transmission. Depending on the nature of the content and the contributor's involvement with it, it may be appropriate for a member of the team, preferably the main contact, to keep in touch with the contributor and their family to monitor any specific after-effects that might have resulted from their participation. However, you should consider the consequences of continuing a relationship or communication beyond the recording/event. A vulnerable child/family may seek you out for further, ongoing support which could place you in a difficult position. In some cases, providing access to sources of professional help or support, such as a psychologist or counsellor, may be advisable.

There may be some very sensitive content where it could be appropriate for Sky to limit the period of time that the programme should be repeated. However, the contributor and their parents should be made aware that third party websites may reproduce our content globally without our knowledge or consent, so no guarantee can be given that a contribution will not be seen in particular countries.

Please be aware that even if appropriate safety measures for contributors are in place, you must also consider for all pre-watershed and any ratings below a 12 whether a child watching or listening on their own, without adult supervision, could easily copy the behaviour and harm themselves. See *Ofcom Rules and Guidance on 'Imitable Behaviour'*:

<https://www.ofcom.org.uk/tv-radio-and-on-demand/broadcast-codes/broadcast-code/section-two-harm-offence>

https://www.ofcom.org.uk/_data/assets/pdf_file/0023/104657/Section-2-Guidance-Notes.pdf

N: Online and Social Media Issues

Online & social media activity for all programmes should mirror Sky's editorial values and the values of the programme.

Details of any proposed online presence associated with a production must be discussed with your Sky production & compliance contacts before any such activity is undertaken or domains selected. Please do this as early as possible as some processes have a significant lead time. Whether it's a website, social media page, group, or channel, your production contact will engage Sky's Online Compliance team to run proposals through the iComply process icomply@sky.uk

Programme hashtags - Must be cleared with Sky Online Compliance before use.

Programme Interaction

Where an element of the programme requires entries, votes, user generated content, or other interaction via online channels, please provide details to your production contact and content compliance contact at the earliest opportunity, **before**

commencing online activity. The Sky Social Media team & Online Compliance team can advise on best practices through the iComply process icomply@sky.uk

Accounts should mention if engaging with the programme online may form part of the broadcast programme where this is the case. This can be achieved with a note in the biography section and by periodically posting during activity to indicate this intention to users.

In accordance with the ICO Children's Code, reasonable steps must be taken to ensure that under 18s are not contacted and contributions are not sought or used from under 18s without the requisite parental consent. Interactions should be via parent / legal guardian social media accounts only. Posts from under 18s should be anonymised or only first names visible, blurring any handles or profile images.

Any associated online activity should be appropriately moderated, and particularly where such activity will form part of the broadcast programme. Appropriate safeguarding and escalation strategies should be observed. Your Sky production contact & the Online Compliance team will be able to advise using Sky's Safeguarding and UGC policies icomply@sky.uk

Extraneous material unrelated to the programme should not be included in broadcast comments.

When publishing online comment in broadcast programmes, producers should be mindful of the possibility that even where a user interacts with a hashtag or @tags the account, they may be engaging with the online chatter without being familiar with the wider programme. **(See also the UGC (User Generated Content) section below)**

Producers must consider the possibility that programmes may be viewed outside of the initial broadcast period and take reasonable steps to ensure that audiences are aware of the period during which they may interact with the programme.

Please consider whether it would be appropriate to geo-block online activity associated with a programme outside of the relevant territories. This is particularly relevant where there is a competition element that is only for the UK & ROI, rights issues, or local market regulation to consider icomply@sky.uk

User Generated Content

Producers should obtain '*informed consent*' from the rights' owner, credit contributions, and ensure that any elements are adequately cleared. The privacy, and data protection implications must be considered when using these materials in a broadcast programme. Consideration must also be given to other legal issues such as defamation and contempt. Producers should consider that broadcast of UGC may reach a wider audience than the initial post and the potential impact of re use.

Prize promotions (Competitions, prize draws and giveaways)

Social media run promotions must state key barriers to entry such as name, age, residency, promotion period/closing date(s), entry requirements and include a link to the full terms and conditions in the main body of the post. These must also be stated both verbally and as on-screen during any broadcast calls for participation, please see the promotions section of the production pack for more detail. **Add link to commercial / promotions section of production pack here**

Prominence of online brands

Broadcast references to brands including websites and social media platforms must not be unduly prominent.

Advice for talent

Further guidance for contributors and talent is available as a separate document.

Contact By Journalists

If you are contacted by a journalist, or any member of the press tries to get in touch with you about the programme or your contribution in it, please do not speak to them before discussing this with your production contact. If it is via a message, pass it to your production contact and Sky can help to handle it for you, or with you, if it's something that you'd like to do

Comments about you

When the show is on air, content from the programme, which may include your contribution may be posted on social media platforms as part of promotional activity. We recommend that if you plan to re-share posts that you discuss this with your production contact beforehand.

O: Appropriate Behaviour with Contributors

We want the experience of working with Sky to be a good one for all contributors - to do otherwise could distress them. In all dealings with contributors and actors, especially young people and children, clarity is key. Always make sure the child and parents understand what is planned, (*see "Informed Consent" - Section F*). Make sure the potential long-term consequences of participation are explained and never make promises that cannot be kept. Being clear about intentions is especially important on a long-term project as you build up a working relationship with a contributor, family, or child, especially if any of the contributors are vulnerable.

You also need to make it clear to external organisations what you expect from them, for example that you do not expect them to leave you unsupervised in a class of children. When visiting an external organisation that works with children, make sure you have suitable identification. A line manager should be aware of your visit, so that the organisation can check your authenticity, if they wish to.

P: Appropriate Behaviour with Children and Young People

You should think about appropriate behaviour with children, beginning at the research stage. Wherever possible liaise with the parents/school for contact information and use a Sky/Independent production company contact address, email, or phone number, especially for any contact with children. It is important to use an office number even if you normally use your own mobile for work calls. If for any reason you give out a mobile number, a senior member of the team should be notified, and a record should be kept.

We normally aim to work with children in the presence of those responsible for their supervision, although circumstances may vary. It is sensible to provide a single, consistent point of contact on the production team, someone who can also oversee the contributor or actor's welfare throughout and with whom the participant and parents/guardian can liaise throughout production.

When working with children or young people, avoid entering a room where they may be changing their clothes or not fully dressed. If it is vital to speak to the child, make sure another adult is present. Do not initiate physical contact - this can obviously be innocently intended but it can easily be misunderstood. However, if a child comes to you, or is in distress, act responsibly ensuring you are in a public space with at least one other adult present.

If physical contact is necessary, for example by a make-up artist or by a sound engineer attaching a radio microphone, ensure the child is accompanied by a guardian/chaperone and that doors are kept open. Where possible, you should be within the hearing of others. Any contact should also be age appropriate; you should ask the child's permission beforehand and explain what you want to do and why it is necessary.

A child should never be made to feel uncomfortable in any way. Make sure that the child and young person continues to feel comfortable with their participation throughout. You should respect their wishes if they change their mind. Never engage in or endorse any bullying or harassment of a child. Make sure you do not use inappropriate language in front of a child. Words which may appear to be a simple term of endearment, e.g. "*beautiful, sweetie, honey*" could be inappropriate when directed towards a child and their first name should be used to address them.

It is important that all production staff, crew and on-screen talent are briefed appropriately so that they put the child's welfare first. In an adult drama, where there is strong language and action on set, make sure this does not spill over off set. (*See also "Evaluating the impact of a contribution on a contributor" Section M*)

Training should be given to staff who have little experience of working with children.

Q: Child Licensing

A child licence must be obtained for a child taking part in a performance for broadcast when they are of an age where they are still legally required to be at school. A licence is required for children 16 and under. See note below.

Licensing is an important matter - not to license when required to do so is a breach of the law. (*Current guidelines are available via a link at the front of this pack in the **Content** section, to: **Best Practice - Child Performance & Activities Licensing by Local Authorities in England (Feb 2015)** and **PACT's Guidance for Filming with Children and Licensing differences across the UK (2015)***). Here you can get details of the licensing rules and regulations, how to apply for a licence and details of when a licence is not needed. Independent production companies should talk to their Sky Commissioning Exec and their Compliance Contact if they have any concerns about licensing.

N.B. A child is of compulsory school age until the last Friday in June of the academic year in which they reach 16. Note that it is now compulsory in England for a young person to remain in some form of education until the age of 18. However, licensing applies to school age children i.e. up to the end of the academic year after the child turns 16. It is the responsibility of the producer to obtain the licence and a Local Authority can insist upon 21 days' notice. Failure to obtain a licence may result in a fine and/or imprisonment.

R: Contributors with Disabilities and Vulnerable Contributors

Sky will always seek to be inclusive of all sectors of the community which may include working with people with disabilities and vulnerable people within society.

Child contributors or actors who have disabilities and vulnerable contributors may have additional welfare requirements. It is important to contact relevant experts and organisations for advice and follow relevant protocols to ensure the right level of safeguarding and additional welfare needs are put in place. Advice should also be sought from experts on the appropriate language when referring to a particular disability.

S: Transport

Your transport policy should set out clearly how children involved in your production will be transported. Children should always be accompanied by a parent, legal guardian or licensed chaperone registered with the relevant LEA licence. If transporting under 18s, consent should be obtained from the parents beforehand and due care taken to ensure that no under 18 is left to travel alone with any adults who have not been DBS checked. Reliable taxi or hire car firms who have drivers who have had DBS checks should be used. Avoid transporting child contributors with other adult contributors, other than their parents or talent/presenters to ensure the child's welfare is protected at all times.

T: Work Experience

Minors (School Children up to 16 years of age)

Work experience placements should be formally set up with the child's school and you are obliged to follow the strict limits and experience criteria laid down by the school/education authority for that placement. These placements are shadowing/look and learn experiences and as such do not require payment as no 'work' is undertaken by the student.

If a placement is organised less formally (*typically by a production company employee who wants to give a child they know some work exposure*) this will also be a shadowing/look and learn placement and as such does not require payment.

Strict guidance on supervision should be followed and child protection precautions taken during all placements of minors, including background checks on supervising staff members where appropriate (again criteria and guidance apply by the relevant authorities) irrespective of whether formally organised through a school or less formally organised through an alternative source.

Student placements/internships etc.

A-Level or Degree students undertaking longer term **paid** placements or summer work must always be paid at or above minimum wage levels.

7: GOOD PRACTICE – CONTRIBUTOR/TALENT WELFARE

In 2021 Ofcom expanded their guidance for **Section 7** of the Ofcom code, **Fairness** and in particular duty of care of *Participants in Programmes* (PIP) in relation to informed consent, transparency, fair representation and the support of contributors - <https://www.ofcom.org.uk/tv-radio-and-on-demand/broadcast-codes/broadcast-code/section-seven-fairness> ; The following link will take you to the further guidance for this section of the code, which give more detailed guidance: https://www.ofcom.org.uk/_data/assets/pdf_file/0017/24713/section7.pdf ;

The following section gives a summary of Sky's good practice guidance for the welfare of all contributors/talent both paid and unpaid and especially under 18's and vulnerable adults.

STATEMENT OF INTENT:

At all times the best interests of the contributor's/child's, physical, emotional, and psychological wellbeing must take precedence over the production and all other issues.

General Points

Having a written policy on contributor and child welfare and safeguarding is always advisable and **is mandatory for any production where the subject matter is of a sensitive nature or contains under 18's**. This may potentially include the use of experts. If it is decided to involve an expert in the production their guidance should take precedence over the production and final programme.

- Developing written guidelines covering practices and procedures for working with contributors; with particular emphasis on the care and protection of children and vulnerable adults who take part in the programme; the NSPCC guidelines are a useful bases when dealing with children.
 - The guidelines should include the Duty of Care provisions for participants for both *before, during* and *after* the filming, if appropriate for the programme.
 - Ensuring all staff are trained on those guidelines and abide by them.
- Working with experts, e.g., clinical psychologist, child psychologist or health experts where appropriate – this is relevant for both non-scripted and some scripted content where the subject matter is sensitive or controversial, particularly when involving under 18's.
- Where relevant, having medical staff, including specialist nurses and counsellors, present during programme making and on call at other relevant times.

Content involving Under 18's:

- Having a named member of staff who is responsible for the child protection policy and implementation and agreeing this with Compliance.
- Staff who are working directly with children need to be DBS checked.
- Staff working with children should have access to the production company's child protection policy and guidelines as well as the broadcaster's child protection policy and guidelines for working with children.
- Ensuring that a parent or chaperone is present, even during phone interviews; in exceptional circumstances making sure that two members of staff are present in the absence of a parent/chaperone.

Before filming

- Compiling detailed notes about the contributor/child's background including medical history and relevant mental health issues.
- All contributor details including biogs, personal details etc. must be kept on an encrypted and password-protected document/file and only circulated to specific staff who require this information, for the purposes of data protection compliance. These files should be deleted once the programme/series has had its first TX.
- Where appropriate; require the participants to be assessed by a psychologist to ensure they are robust enough to deal with taking part in the production and the public exposure they may get from taking part in it.
- Ensure the editorial of the programme or series including the tone is fully explained to the contributor and how their involvement will fit into this. Provide them with specific details of what their involvement will be, the timeframes and the possible impacts to them; both positive and negative, of being involved in the programme as part of seeking informed consent.
- Gaining awareness of parental custodial issues. It is important to be aware of the identity of the custodial guardian of the child so that appropriate parental consent/(s) can be given.
- Where appropriate, obtain sign-off from their General Practitioners (GPs) to gain appropriate knowledge of specific care needs in order to protect the participants.
- Where appropriate, productions featuring vulnerable or disabled contributors should seek advice from relevant health and welfare experts to confirm whether the participant is able to give informed consent and steps should be put in place to ensure their consent on an ongoing basis.
- Ensuring that a number of people in the Production team are aware of any issues surrounding the contributor rather than just one or two. Extra care will need to be taken in relation to confidentiality issues in these circumstances.
- With under 18's using the NSPCC cards provided by the Chaperone to participants and their parents which explain what to do if a participant or parent is unhappy about anything.
- Ensuring that a parent or chaperone is present, even during phone interviews; in exceptional circumstances making sure that two members of staff are present in the absence of a parent/chaperone.
- Asking the child for his/her consent, and not just asking the parent; for over 11's separate consent forms written in child friendly language should be used.
- Checking, immediately before filming, that the child still wants to take part and is happy to proceed.
- Ensuring continuing consent and on-camera consent, particularly for vulnerable adults and younger participants throughout the process.
- Familiarising children with unfamiliar environments, e.g., tour of studio.
- Children to be accompanied by people who they know, such as a parent or a teacher.
- Where possible, giving participants the chance to meet with former participants in order to gain a better understanding.

During filming

- Making the contributor/child look good on the show and boosting their confidence, e.g., through choice of questions in quiz shows.
- Managing a studio audience, e.g., not allowing booing or calling out so that the contributor/child is not intimidated or distressed by the audience.
- If a contributor/child asks for filming to stop or becomes distressed, then filming should stop; this event will not be broadcast without consultation with compliance and consent from the contributor.

After filming

- Any material that portrays a contributor/child negatively should be discussed thoroughly with Sky Commissioning, Compliance, Production and the Psychologist working on the show to assess whether there is editorial justification for retaining it and what possible impact that may have on the contributor, or whether the material should be edited out.
- Contributors should never be given editorial control over what material is used within a programme, however if there is specific material that a contributor does not want aired careful consideration should be given to this request and discussed with Sky as to whether the material should remain or be edited out.
- Keeping in contact with participants after the programmes, e.g., with regular follow up calls from an expert, such as a psychologist.
- Organising appropriate counselling for participants afterwards if needs be, e.g., by tailor making support by liaising with the participant's GP and organising delivery of post-programme activities that might be helpful on request of participants.
- Ensuring that programmes featuring teenagers that are not designed for teenage viewers are not shown during the school holidays in order to prevent possible negative repercussions, such as the increased chance that the participant's peer group will see them on television which could lead to teasing or bullying.
- Taking into account the impact of a show on the viewers, e.g., taking care not to show children acting in a way that might encourage dangerous or inappropriate, copycat behaviour to other children viewing pre-watershed content.

ADDITIONAL AREAS FOR CONSIDERATION:

The following section, in combination with the preceding section, Good Practice, outlines some areas for consideration when drawing up guidance for working with contributors/ vulnerable adults and children.

- There is sometimes a lack of *informed consent*, fully explaining the possible repercussions of taking part in a programme, which can result in contributor issues post-transmission. Please ensure you brief your contributors thoroughly at the beginning of production and that any briefing documents given to them clearly outline what the programme is about, its tone, what channel it will be shown on and the repeat nature of Sky content. Their involvement in the programme and any possible repercussions they may experience as a result of being involved (*e.g., family and neighbors' comments etc.*) must be fully explained.
- Younger participants, who may be having doubts about taking part, may feel pressured to because they want to please family members or the celebrity presenter – therefore production must always ensure they are acting in the best interest of the child and check ongoing consent directly with the child.
- In some instances, reliance on some production companies' own Contributor codes of practice may mean certain information is not always formally documented although it may need to be re-called at a later date, say in the event of a complaint. We recommended that it is best practice to retain documentary evidence or keep a log to record all conversations or incidents that occur with contributors during production.
- There is sometimes a lack of criminal records checks undertaken particularly for young people, this can lead to problems later on regarding disclosure e.g., young offenders' data, so should definitely be considered where appropriate.
- There should be separate guidelines for 16–17-year-olds, particularly if these people are married, working, or living independently from their parents or carers.
- If a programme involves children who are present as standbys, consideration should be given to their experiences if they do not get a chance to participate. In some cases, they may be given a formal role as a supporter of a person, group or team.

8(A): NON-SCRIPTED ENTERTAINMENT SHOWS AND FACTUAL CONTENT

The below points are not necessarily relevant to celebrity guests; however, it may be warranted to carry out some form of checks, where relevant, on guests who are in the public eye.

- In general Producers should secure two forms of identity from all guests/contributors taking part - one of which must have their name and address on it - e.g., a utility bill, passport etc. Third party verification of guests' identity and stories should be sought where possible.
- Expenses for guests/contributors will vary depending on individual circumstances. Producers should in the first instance offer to pay reasonable travelling expenses and offer payment, when requested, for loss of earnings. Payments for loss of earnings are acceptable if claims are genuine and the producer feels the guest/contributor adds value to the programme. Such payment should be discussed and agreed with your commissioning exec and compliance and should be a minimal fee. It is however recognised that for certain guests, for example experts or celebrities, this sum may be greater.
- **No payment may be made to convicted or confessed criminals for contributions about their crimes, (including reimbursement of expenses), unless justified in the public interest (NB this would include celebrities). Any proposal to pay any contributor should be discussed and cleared with Sky.**
- Payments for loss of earnings due to appearances on the show must be sent to the participant's home address.
- No payments of any kind should be paid to any third party, except to celebrities' agents or experts with agents.
- No payments of any kind should be made in cash on the day of recording.
- Verifiable addresses and contact telephone numbers should be sought for all participants in advance. Where addresses and numbers are not provided, or numbers cannot be obtained, producers should use their common sense in determining what further checks should be carried out and whether the guest/contributor should be used. Guests/contributors who can only be contacted by mobile phone and cannot or will not provide a proper proof of address should not be booked for a show/used in a programme.
- Talk Shows: Guests must provide details of any other talk shows on which they have appeared at any time. The consent form **must** contain a declaration that the guest has either (a) never appeared on another talk show, or (b) has appeared on another talk show, providing details of the programme title, the capacity in which the guest appeared and the year of the appearance. **This is likely to be less relevant for celebrities who by the nature of who they are will have appeared on other programmes/shows.**

All contributor details including biogs, personal details etc. must be kept on an encrypted and password-protected document/file and only circulated to specific staff who require this information, for the purposes of data protection compliance. These files should be deleted under advisement from production and following proper data protection guidelines.

During an Election/Referendum: If a programme is to be broadcast during a period of election/referendum and will deal with issues connected to these elections, then additional rules regarding fairness and impartiality come into force. Details of the rules can be found on the Ofcom website:

<https://www.ofcom.org.uk/tv-radio-and-on-demand/broadcast-codes/broadcast-code/section-six-elections-referendums>

Although we can broadcast appearances by candidates in non-political programmes that were planned or scheduled before the election/referendum period began, no new appearances should be arranged/broadcast during the period. [NB: an election can be a general election, by-election, local government election, mayoral election and regional/national election (e.g.: Scottish, London Assembly etc.). A referendum includes a UK-wide, national or regional referendum but **NOT** a local referendum. The definition of the 'election period' varies; however, a general election period begins with the dissolution of Parliament. Please liaise with your Compliance Contact for any further clarification regarding definitions and periods of election and referendums.

For example, an appearance by a candidate in a show talking about a subject matter not connected with politics would be fine. However, if the candidate talked about his or her politics/constituency policies, we would have to give equal prominence to the views of other candidates standing in the same area/region. This is especially relevant to live programming such as magazine formats and chat shows.

Please liaise with your Compliance Contact for advice on booking guests around election/referendum periods.

8(B): CRIME RELATED FACTUAL CONTENT:

When making Crime Related Factual programmes it is important to ensure the privacy and safety of not only our contributors but also any victims of crime, their families, potential witnesses, and where necessary serving members of the emergency services. In terms of the latter, this is particularly important with serving police officers who may be put at risk by being identified on camera if they have subsequently gone undercover. The following guidance outlines the form of safeguards that should be put in place.

- All parked car license plate numbers when clearly visible and parked within the Scene of the Crime location should be blurred.
- Blur all house numbers/names especially if in the SOC (*Scene of Crime*) location.
- Current residents of all SOC (*Scene of Crime*) houses or apartments seen should be informed that the properties will be featured in the episode.
- It would be better to avoid specific location information if possible (*street and road names etc.*)
- Unless there is a specific reason for inclusion blur all 3rd party phone numbers/URLS seen in the series.
- If any paperwork is used in the production this should be double checked that it does not contain any information that could lead to the identification of an individual.
- All serving emergency personnel (*Police, Fire, Ambulance etc.*) who are recognisable and used in footage should be informed that they might be seen in this series. Please check with them that they are happy or blur their faces accordingly (*even on press or news footage*) especially on more recent cases.
- Checks need to be made with any places of education featured (*schools, colleges, or universities even if only just exterior/street shots are used*) to inform them and to gain their permission for inclusion. (*Permission wouldn't need to be obtained unless filming inside grounds/premises. Letter informing the institution of its featuring as a courtesy is enough.*)

9: LIVE & AS LIVE PROGRAMMING

DUTY OF CARE AND CONTESTANT PROVISIONS:

- Consent forms are needed for all contributors/contestants; including parental consents for all under 18s (where necessary ensure consents from both parents – see section G).
- Any under 18s not accompanied by a parent or guardian must be accompanied by a responsible adult who has consent from the parents to act as loco parentis for that child (chaperones, teachers, sports, or dance instructors).
- Health assessments/questionnaires and sign offs should be obtained for all contributors/contestants.
- On competition-style programming featuring contributors/contestants Producers should ensure that biogs for all performers are sent through to the Psychologist working on the show so they can assess any specific vulnerabilities and highlight them to Production and Compliance. The Psychologist should be on hand to talk to all contributors and offer their support throughout the production process and live shows.
- All contributor details, including biogs, personal details etc. must be kept on an encrypted and password-protected document/file and only circulated to staff who specifically require this information: for the purposes of data protection compliance. These files should be deleted once the programme/series has had its first TX.

SPECIFIC PROVISIONS FOR CONTESTANTS UNDER THE AGE OF 18:

- Child performance licences will need to be obtained for all performances involving 16-year-olds and under through their local LEA. LEA licensing applies to children of statutory school age until the end of the school year they have turned 16 yrs.
- Separate changing area and toilet facilities should be present for under 11s.
- Professional Chaperones should be provided to help with child welfare.
- Rest breaks and meal breaks must be adhered to and documented, for all children involved during the auditions and filming processes. (Please see Section 7 Good Practice Talent/Contributor Welfare regarding these).

PRIVACY DURING FILMING:

- Please make sure crews are careful about filming around areas where contestants could be changing, especially under 18s.
- If a contestant is upset be guided by the Psychologist as to whether to stop filming.

FAIRNESS:

- Equal treatment, time on camera and prominence should be given to each contributor/contestant.

PREWATERSHED LANGUAGE ON AIR:

- Sky's family viewing policy applies to ALL pre-watershed programmes and, as such, there should be no swearing at all in LIVE programming

PLEASE ENSURE THAT ALL CONTRIBUTORS ARE FULLY BRIEFED ON THESE ISSUES:

- Avoid any religious words – ‘Jesus’, ‘Jesus Christ’ etc. should not be used as exclamations – avoid any other religious words. Also try to avoid ‘Oh My God’ – as repetition of this can cause offence.
- Presenters/Judges should not use any bad language, not even mild swearwords. Ofcom language research published in 2021 provides guidance on viewers’ feedback on what constitutes “bad”, “mild”, “strong” and “very offensive” language. <https://www.ofcom.org.uk/research-and-data/tv-radio-and-on-demand/tv-research/offensive-language> . Please refer language queries to your Compliance Contact for approval.
- If a contributor/contestant uses strong language, GIVEN IT’S A LIVE SHOW, the presenter should apologise to viewers and explain that this type of language is not acceptable and should not be used on this programme.
- If very strong bad language is used e.g., “Fuck” or its alternatives an immediate apology should be made. It may be appropriate at the end of the live show to reiterate the apology to viewers. Otherwise, it should be dealt with in edit including any VOD versions of the programme here it should be removed.

LIVE TV PRESENTERS / JUDGES / CONTESTANTS:

- Ensure that all presenters, judges, and contestants are briefed and understand; **THIS IS A LIVE SHOW – THERE IS NO TIME DELAY** (*Live Arts/Music events that will have a delay should still give their presenters etc. the same guidance*).
- There should be no swearing at all – daft examples of this are people spelling swear words as they don’t think this will count as swearing – it does! This includes acronyms such as “MILF, GILF, etc.” as they are known to refer to the F-word.
- They should not wear branded clothes or discuss any brands (*unless it is in context and not promotional*); if a contributor is wearing clothing with a very small logo on it and it’s small and not overly visual then this will usually be ok. The key thing is that the branding or logo is NOT prominent.
- All contributors should understand the following details regarding opinions, defamation, contempt of court and commercial issues.

OPINIONS & LEGALS:

- Judges and Contestants are allowed their own opinion on a subject/performance that is being discussed.
- Opinions given about other people and their performances, both celebrity and non-celebrity, should be given as a fair critique, rather than being critical and derogatory, it should not become personal. We cannot be unfair to people – whoever they are.
- An audience briefing should be given to ensure that none of the contributors/contestants are booed and that the audience is welcoming and enthusiastic.
- **CONTEMPT OF COURT** – To avoid any risk of prejudice please refrain from discussions concerning any ongoing legal proceedings.
- **DEFAMATION** – a factual statement which is:
 - untrue; and
 - harms an individual’s or an organisation’s reputation
- Use of the phrase “alleged” or “allegedly” is not a failsafe shield. Unless a person is convicted of a crime – we should not suggest that anyone is a criminal or involved in criminal activity. Do not allow any gossip or anything you are not sure is true to be included – if you think it could be dodgy – it is probably best not to include it.
- Do not talk about anyone under the age of 16 – unless they are in the public arena and in the newspapers.

COMMERCIAL REFERENCES:

- No branded clothes for presenters, guests, or visible members of the audience (*with the exception of small logos that are peripheral and not unduly prominent*).
- When discussing DVDs, books etc. a brief verbal and/or visual mention is ok, but more than this could result in undue prominence issues.
- Mentions of other products or services must only be made if it is editorially justified. Please discuss with Compliance beforehand.
- The presenters should make no promotional mentions of any product or service.

Details of # tags, Facebook Pages or web pages are **only** allowed if they are **programme-related**, no third party

MAIN POINTS DURING LIVE SHOWS:

- **NO SWEARING AT ALL** – not even mild swear words
- **BE FAIR** – give equal time to each contestant/act.
- **THE AUDIENCE SHOULD BE WELCOMING AND ENTHUSIASTIC** – an audience briefing should be given to ensure this is the case.
- **ENSURE JUDGES' CRITIQUES ARE FAIR** – and do not become personal.
- **IF A CONTESTANT OR JUDGE SWEARS** – the presenter should apologise to the viewers *immediately*.
- **DO NOT GOSSIP/BE UNFAIR** – about other contestants or people involved in the show, remember this could cause *Defamation and Privacy issues*.
- **DO NOT PROMOTE PRODUCTS OR BRAND NAMES** – brand names and logos should be kept to a minimum at all times – if possible, use generic wording, e.g. mobile phone rather than Nokia, coffee rather than Nescafe.
- **IF IN DOUBT ABOUT ANYTHING** – just ask, the Compliance Team are here to help!

10 (A): SURREPTITIOUS/SECRET FILMING AND OR AUDIO RECORDING

Surreptitious or secret filming **can only be undertaken after discussion with your Commissioning Editor and Compliance Contact** and after consideration has been given to the circumstances and editorial necessity within the programme for such filming. *Surreptitious/Secret Filming* forms **must** also have been filled in by Production and signed off by the Director of Content Compliance, Legal and the Managing Director of Content. The Production Company must also be aware of the Ofcom codes and guidelines under sections 8.12 - 8.15 of the Broadcasting Code <https://www.ofcom.org.uk/tv-radio-and-on-demand/broadcast-codes/broadcast-code/section-eight-privacy> . Please speak to your production and compliance contacts at the start up meeting or as soon as possible if you are considering carrying out any surreptitious or secret filming. This includes any surreptitious filming for Entertainment purposes regardless of whether you intend to seek consent after filming. Links in the **Content** section at the front of this pack will take you to a copy of the **Surreptitious/Secret Filming form - part a)** which must be filled in and signed off prior to filming and **Surreptitious/Secret Filming form - part b)** which must be filled in and signed off post filming.

NB: Secondary approvals prior to TX are also required for the broadcast of any secretly filmed or recorded material.

10 (B): DOOR STEPPING

Door stepping can only be undertaken after discussion with your Commissioning Editor and Compliance Contact and prior sign off from Sky's Director of Content & Director of Compliance.

Ofcom Code 8.11: Doorstepping for factual programmes should not take place unless a request for an interview has been refused or it has not been possible to request an interview, or there is good reason to believe that an investigation will be frustrated if the subject is approached openly, and it is warranted to doorstep. However, normally broadcasters may, without prior warning interview, film or record people in the news when in public places.

Doorstepping Request Form

11: COMPETITIONS (PRIZE PROMOTIONS):

Under UK rules a 'promotion' is the umbrella term used to describe free to enter prize draws (*those with no skill element*) and competitions (*which involve an element of skill, judgement, or knowledge to enter*). It does not include promotions where there is a payment to enter, these are known as lotteries which require a special license that Sky does not have. It may be possible for a programme to include a competition/prize draw however this must always be agreed in advance with Sky and must include discussion with Content Compliance. It is unlikely that Sky would permit competitions where there is any form of payment to enter, or where under-18s are being targeted to enter, therefore it is especially important to liaise with compliance if you were considering either of these things.

Competitions involve a lot of important and sometimes sensitive administrative work. We will need to evaluate things like the Ts&Cs and entry/judging mechanics to ensure these are robust. We will also need to ensure all contracts and paperwork are in place, especially where any third-party providers are involved (*and taking into account GDPR requirements*). When competitions are promoted on-air there are rules that dictate how these appear and what information is included. Ofcom's standard commercial rules are also still relevant and therefore compliance will need to advise on how to promote a competition compliantly.

If you are considering incorporating a prize promotion into a programme please raise this with Sky at the earliest possible stage. If you intend to include any form of online or social media elements as a route to enter a Prize Promotion you will also need to run this through Sky's Online Brand Protection team icomply@sky.uk as well as the Content Compliance Team. Further guidance relating to online competitions can be found in (*Section N*) **Online & Social Media** of this pack.

12: COMMERCIAL CONSIDERATIONS:

The relevant commercial rules are listed in Section Nine of the Ofcom Broadcasting Code, Commercial References in Television Programming, along with supporting guidance. These are available on the Ofcom website www.ofcom.org.uk. Below is a short summary of what the Code rules allow and prohibit.

Ofcom rules state that products/brands/services should not be explicitly promoted within programmes and should not be shown or referred to in such a way as to be deemed unduly prominent. The former of these rules is generally more straightforward and prohibits programmes including promotional statements or things that could be deemed to be advertising lines intended to sell a product. There are some circumstances where brief references e.g., “plugs” may be an acceptable exception to the rules. The latter concept, i.e., undue prominence, is not prescriptive and will differ greatly depending on context, it therefore requires a case-by-case review of how products are being featured within a programme. It is important to note that the rules do not prevent real products from being used in programmes, especially in a naturalistic way, however advice should always be sought from compliance to ensure they are featured correctly.

Product placement is the inclusion in a programme of a product, service, or trademark for a commercial purpose in return for payment (*or valuable consideration*). Product placement is permitted in certain types of programme genres: namely, series made for television, films (*including single dramas and documentaries made for TV*), light entertainment programming and sports programming. Placement in certain programme genres is prohibited: these are - news, current affairs, children’s programmes, religious programming, and consumer advice programmes.

Placement of certain products is also prohibited: cigarettes and tobacco products (*including electronic or smokeless cigarettes*), all medicinal products, alcohol, gambling, HFSS (*high in fat, salt or sugar*) food and drink, infant formula and follow-on formula and any product not allowed to advertise on television.

Programmes containing product placement must feature a specific logo which is dictated by Ofcom and referred to as the ‘*universal neutral logo*’. The production company should supply the TX master with the logo embedded for broadcast and on-demand content. See ‘**Product Placement Logo Guidelines**’ below.

The rules prohibiting promotion and undue prominence still apply to product placement, however the thresholds of what is acceptable will likely alter to ensure a brand gets value for their payment. The nature of how a product will feature should be discussed with Content Compliance.

All Product Placement commercial discussions or agreements must be made in conjunction with Sky. Please contact Jason Hughes (Jason.Hughes@sky.uk) and Kate Norum (kate.norum@sky.uk) to discuss further.

Prop placement which is where a product, service or trademark is used but where there has been no payment (*or valuable consideration*) made to the programme makers/broadcasters. Costs saved by including the product can be disregarded, although props must not be retained by anyone involved in the production where they hold significant value as this could be considered valuable consideration (*i.e., it is expected that any props that hold significant value must be returned after use by the production*). Please note that when entering a prop placement deal there should be no guarantees made around the inclusion/exposure that the product will receive. Prop Placement does not need to be discussed with Sky. In some instances, a “*with thanks*” credit may be acceptable for the prop provider subject to agreement from your commissioning exec and compliance.

Advertiser-Funded Programming (AFP) is, for the purposes of the rules, a form of sponsorship i.e., it is a situation in which a brand is paying money (*either some or all*) towards funding the production with a view to enabling at least some form of promotion. Therefore, it is a requirement that AFPs adhere to rules requiring the signaling of sponsorship.

There are various methods in which a sponsorship can be credited, this can take the form of standalone credits/idents which are scheduled adjacent to the programme, or within the actual programme itself (*e.g., on titles and part bumpers*).

The latter is more common for AFPs, where the brand is sometimes incorporated into the show title, however this form of crediting is subject to further rules. If making an AFP, you should discuss with Content Compliance the various options for programming naming and signaling to decide which works best for your programme. It should also be noted that where a brand sponsors/funds a programme it will usually be assumed that if this brand features in the programme itself that this will have occurred because of the commercial arrangement and that this inclusion will therefore amount to product placement. This means that the above guidance on product placement also needs to be followed on almost all AFP programming (*notably the requirement for the universal logo*). Again, how the funding brand will feature should be discussed with Content Compliance.

PRODUCT PLACEMENT LOGO GUIDELINES

As noted above the universal logo must be applied to programmes containing product placement. The production company should supply the TX master with the logo embedded for broadcast and on-demand content.

The logo must be shown at the start of the *programme* (i.e., within the first 5 seconds of the show so it appears *BEFORE* any shot of the placed product(s)), the start of returning parts (e.g., on the incoming part bumper) and on the final endboard along with the production company logo and copyright credits.

The P logo should be static on screen for a duration of no less than three (3) seconds (75 frames). If you fade up/down the fade should not be included in the required 3 seconds.

The P logos can be downloaded from the **Ofcom website** at:

<http://www.ofcom.org.uk/static/pp/logo1.tif> and <http://www.ofcom.org.uk/static/pp/logo2.tif>.

Logo One (1) has a white outline intended for use over predominantly dark backgrounds and Logo Two (2) has a black surround intended for use over predominantly light backgrounds. The logo should be clearly visible throughout its duration on screen and placed in the bottom left corner within the 4:3 safe area (*but not conflicting with other on-screen graphics, logos, or text*).

The TIF files on the Ofcom website contain broadcast-quality, oversized alpha elements of the P logo which should be re-sized to meet the following line height specifications:

Outer P

Line Height

Standard Definition:

High Definition (1080):

Transparency: 35%

Inner P

Line Height

36 lines Standard Definition 26 lines

68 lines High Definition (1080): 49 lines

Transparency: 50%

When calculating the line height, the measurement should be taken from the top to the bottom of the 'P' and only non-antialiased pixels should be counted. For more information on line height, go to: <https://www.asa.org.uk/resource/on-screen-text-and-subtitling-in-tv-ads.html>

Full technical information and specifications can be found on the Ofcom website in the [Guidance Notes for Section Nine](https://www.ofcom.org.uk/tv-radio-and-on-demand/broadcast-codes/broadcast-code/section-nine-commercial-references-tv).

<https://www.ofcom.org.uk/tv-radio-and-on-demand/broadcast-codes/broadcast-code/section-nine-commercial-references-tv>

LINKS TO DOCUMENTS REFERENCED IN PACK:

1. Contributor and Data Protection Checklists:
 - a. [Entertainment & Factual](#)
 - b. [Documentaries & Crime](#)
 - c. [Kids](#)
 - d. [Internantional Dramas](#)
2. [Intimacy on Set Guide - Nudity & Sex Scenes](#)
3. [Online & Social Media Guide for Contributors/Talent](#)
4. Best Practice – Child Performance & Licensing by Local Authorities in England (Feb 2015)
5. PACT's Guidance for Filming with Children and Licensing differences across the UK (2015)
6. [Surreptitious/Secret Filming Form 1](#)
7. [Surreptitious/Secret Filming Form 2](#)
8. [Door Stepping Form](#)