



## **Hearst Networks Compliance Handbook**

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## 1. Introduction

At Hearst Networks, we share stories that matter - stories that are unique, trusted, entertaining and global. For over a century, Hearst has built enduring brands by informing, inspiring and entertaining audiences across the UK, Europe, the Middle East and Africa. Whether our content challenges and inspires intellectually or simply entertains, we aim to make a positive contribution to the diverse audiences we reach. The trust placed in our brands is central to our success and longevity.

This Compliance Handbook reflects that commitment to trust. It sets out the standards that apply to all content commissioned, acquired, produced or published by Hearst Networks in the UK. It is designed to support content creators in delivering creative content while ensuring that legal, regulatory and ethical responsibilities are met consistently and transparently.

This handbook is intended for:

- Hearst Networks editorial, production and operational teams;
- All third parties creating content for or on behalf of Hearst Networks; and
- Acquisitions partners.

These standards apply across all genres, formats and platforms, including broadcast channels, streaming content, online content and podcasts, and to both commissioned and acquired content. Regardless of format or distribution model, the same core compliance and editorial standards apply.

Creative ambition is always encouraged. Much of our content explores challenging subject matters, including true crime, history and real-life events. However, ambition must always be balanced with fairness, accuracy, respect for contributors, safeguarding, and careful consideration of audience impact.

This Handbook should be read alongside the [Ofcom Broadcasting Code](#) and the additional policies and guidance referenced throughout. It is not a definitive guide, nor does it replace legal advice, but provides practical standards to help content creators navigate risk responsibly.

## 2. Applicable Law and Regulatory Standards

All Hearst Networks content must comply with all applicable laws and regulatory frameworks in the territory in which it is broadcast or made available. Producers are responsible for ensuring that they are familiar with the applicable regulatory standards relevant to their production.

### 2.1. The Regulatory Framework

For UK services, the primary regulatory framework is the Ofcom Broadcasting Code, which sets standards for content and the treatment of contributors. The Ofcom Broadcasting Code represents the benchmark standard for Hearst Networks content. Even where content is distributed across multiple territories, we expect it to meet Ofcom standards as a minimum requirement.

Failure to comply with the Ofcom Code can have serious consequences. Breaches of the Code could result in an investigation and a public finding by Ofcom. Ofcom has the power to require the broadcast of corrections or statements of its findings, to impose fines, to shorten or suspend licences and, in the most serious cases, to revoke a broadcasting licence. The publication of an adverse finding, and any resulting regulatory sanction, can attract significant media attention and may damage the reputation of both Hearst Networks and the team behind the content. For this reason, maintaining compliance is essential to protecting our brands and our production partners.

In addition to the Ofcom Code, producers must have regard to any other relevant industry guidance that may apply to the genre or format concerned. For example, where applicable, this may include guidelines issued by recognised industry bodies such as [The Association of True Crime Producers](#).

Advertising and commercial communications are also subject to regulation by the Advertising Standards Authority (ASA), which regulates advertising across all media in the UK. Where content involves sponsorship, product placement, advertiser-funded content or other commercial partnerships, producers must ensure compliance with both the Ofcom Broadcasting Code and applicable ASA requirements. Further

guidance on commercial references, sponsorship and advertiser-funded content is set out in Section 4.11 below.

## 2.2. The Legal Framework

In addition to ensuring regulatory compliance, content creators must ensure compliance with the law. While you are not expected to know the law in detail, you should ensure that you have a practical understanding of the applicable standards to help you understand when to seek legal advice.

The areas of law most likely to be relevant to content made by or for Hearst Networks are:

- i. **Defamation** – protects individuals and companies from false statements that are likely to cause serious harm to their reputation (Defamation Act 2013). Defamation issues commonly arise where content includes allegations of wrongdoing, misconduct or criminal behaviour about identifiable individuals or organisations. These risks generally arise only in relation to living individuals or existing companies or organisations.
- ii. **Privacy and confidentiality** – respecting individuals' reasonable expectation of privacy and protecting confidential information (Human Rights Act 1998). Privacy issues commonly arise where content includes personal information, private locations, medical information, references to family or other aspects of an individual's private life.
- iii. **Contempt of Court** – protects against content that creates prejudice to criminal proceedings in order to ensure that defendants can receive a fair trial (Contempt of Court Act 1981). Content referring to active criminal cases may risk prejudicing a trial or related proceedings. In general terms, criminal proceedings become active once a person has been arrested, charged, or a warrant or summons has been issued, and remain active until the case has concluded.



- iv. **Copyright** – protects the copyright holders of artistic works such as photographs, artwork, video footage and music (Copyright Designs and Patents Act 1988). As standard, we require permission of the copyright holder before using third-party owned images, footage, music or other creative works.
  
- v. **Data Protection** – protects the personal data of individuals (Data Protection Act 2018). Data protection issues may arise where content involves personal information relating to identifiable individuals.

**Where content raises potential issues in these areas (particularly in relation to crime, allegations of wrongdoing, vulnerable contributors or ongoing court proceedings), content creators must seek appropriate legal advice at the earliest opportunity and must keep your Compliance contact informed.**

### **3. Working with Hearst Networks**

#### **3.1. Compliance as a Shared Responsibility**

Compliance is a shared responsibility between Hearst Networks and its production partners. Early, open and transparent engagement with Compliance is essential to protecting contributors, audiences and the integrity of our brands.

Producers are responsible for ensuring that their content complies with applicable legal and regulatory standards. Hearst Networks retains final editorial responsibility for content broadcast or published under its brands. This includes responsibility for ensuring compliance with the Ofcom Broadcasting Code and other applicable standards.

Effective compliance depends on early engagement and ongoing communication. Issues relating to fairness, privacy, safeguarding, crime, allegations of wrongdoing or legal risk must not be left until late in the production process. Early discussion allows risks to be identified early and reduces the likelihood of delay, editorial compromise or additional cost at a later stage.

You should not assume that an issue is low risk or self-resolving. When in doubt, matters must be referred to the Hearst Networks Compliance Team.

Transparency is essential. Where processes outlined in the Compliance Process Guide are not followed, this must be discussed and agreed with Hearst Networks in advance. For urgent risk escalation, producers should contact the Director of Compliance directly.

#### **3.2. Key Contacts and Stages of Engagement**

Producers are responsible for identifying when legal advice is required and for obtaining that advice from an appropriately qualified media content lawyer



Each production will be allocated appropriate editorial and compliance contacts within Hearst Networks. These may include:

- i. Commissioning Editor – Di Carter ([Di.Carter@hearstnetworks.com](mailto:Di.Carter@hearstnetworks.com))
- ii. Director of Compliance – Sebrina Zeki ([Sebrina.Zeki@hearstnetworks.com](mailto:Sebrina.Zeki@hearstnetworks.com))
- iii. Director of Legal ([Yasmin.Mahmout@hearstnetworks.com](mailto:Yasmin.Mahmout@hearstnetworks.com))

Producers must ensure they are clear at the outset of a project who their primary Compliance contact is and how and when issues should be escalated.

Should you need further guidance, please contact Sebrina Zeki, Director of Compliance ([sebrina.zeki@hearstnetworks.com](mailto:sebrina.zeki@hearstnetworks.com)).

Compliance engagement is expected throughout the lifecycle of a production, including:

- i. Development and pre-production
- ii. Production
- iii. Post-production (including rough cut and fine cut review)
- iv. Delivery and post-delivery activity

Further detail is set out below and in the Hearst Networks Compliance Process Guide, which provides a step-by-step breakdown of the compliance journey from commission to delivery. Producers must ensure that all required stages are completed before transmission or publication.

### 3.3. Legal Advice and Ofcom Compliance

Producers are responsible for identifying when legal advice is required and for obtaining that advice from an appropriately qualified media content lawyer.

All production partners are required to have insurance in place for projects commissioned for Hearst Networks (often referred to as E&O insurance). E&O insurance is intended to provide protection in the event of a legal claim arising from the content after it has been released or broadcast. Insurers typically require that the



production has obtained appropriate legal review from a specialist media content lawyer as part of the clearance process.

The specialist television pre-publication law firm Reviewed & Cleared is the preferred legal advisor for Hearst Networks. Their lawyers can advise throughout the project and provide a written legal opinion, which is usually required to obtain E&O insurance.

You can contact Reviewed & Cleared early in the project by emailing Co-CEO Clare Hoban at [clare@reviewedandcleared.com](mailto:clare@reviewedandcleared.com) or [lawyers@reviewedandcleared.com](mailto:lawyers@reviewedandcleared.com).

Producers are responsible for ensuring that their insurance arrangements meet industry standards and the requirements of their policy.

Where external legal advice has been obtained, producers must confirm that appropriate legal clearance has been secured and identify any material issues relevant to Hearst Networks' compliance review.

Hearst Networks retains final editorial sign-off. Content may not proceed to transmission or publication until compliance verification has been completed in accordance with the agreed process.

### 3.4. Pre-Production

A formal pre-production compliance process applies to commissioned projects.

Producers should complete the Editorial Specification Form at the outset of production and share it with their Hearst Networks Compliance contact. This helps to identify any high-risk elements early and ensures that appropriate escalation can take place where necessary.

Producers must also:

- i. Arrange a pre-production meeting with the Commissioning Editor and Hearst Compliance at least three weeks before filming. In advance of this meeting, they must share:
  - a. Confirmed story, case or episode information (allowing a minimum of three business days for feedback); and

- b. An up-to-date pitch or treatment.
- ii. During the meeting, producers must:
    - a. Discuss high-level compliance considerations based on the pitch or treatment;
    - b. Agree the process for submission of rough and fine cuts;
    - c. Confirm turnaround times for feedback; and
    - d. Identify any early high-risk issues requiring escalation.
  - iii. Following the meeting, producers must provide:
    - a. A rough and fine cut schedule (at least three weeks before rough cut submission); and
    - b. A confirmed TX delivery schedule.

### 3.5. Production

Risk assessment is not a one-off task at pre-production stage. Content creators should treat risk assessment as a continuous process that runs through development, filming, edit and delivery. New risks can arise quickly. For example, a contributor changes their account, new information emerges, access conditions change, or the edit introduces a stronger allegation or inference than was intended.

Producers are encouraged to ask practical questions at each stage to identify risks early and to ensure they are discussed with Hearst Networks before they become difficult to resolve.

Practical risk assessment questions could include, for example:

- i. What is the core editorial purpose of this content and is the material justified in this context?
- ii. Could any section of the content cause avoidable harm or distress (to contributors, victims, families, or audiences)?

- iii. Are there particular sensitivities (e.g. trauma, grief, graphic imagery, discrimination, self-harm, hate speech) that need careful handling?
- iv. Is care being taken to ensure allegations are not overstated or presented as fact?
- v. Is there anyone who might feel they have been criticised in the content and, if so, have they been offered a fair opportunity to respond?
- vi. Are contributors being treated fairly, both during production and in the edit?
- vii. Are we filming or broadcasting personal information, or material captured in a context where there is a reasonable expectation of privacy?
- viii. Does the content include sensitive locations (homes, hospitals, schools, funerals, crime scenes) or identifiable third parties who are not editorially relevant?
- ix. Are there any active proceedings related to the content (for example, criminal proceedings or an inquest)?

**Where risk assessment questions indicate potential heightened risk, producers should escalate early to Hearst Networks Compliance and/or Legal so that appropriate safeguards can be agreed.**

Any production working with heightened legal risk should obtain specialist legal advice. Our preferred legal partner for productions is Reviewed & Cleared. Full details of all preferred partners and the preferential rates available are set out on page 87 below.

### 3.6. Post-Production

- i. Rough Cuts
  - a. A rough cut must be submitted to both the Commissioning Editor and Hearst Compliance for review.
  - b. Hearst Compliance will provide feedback within three business days, unless otherwise agreed in advance.
  - c. Production companies are expected to respond to Compliance queries within three business days. Where feedback is required outside



business hours, this must be agreed in advance with the Director of Compliance.

- d. Where external legal advice has been sought on the rough cut, this advice should be shared with Hearst Compliance to aid their review.

## ii. Fine Cuts

- a. Fine cuts must be submitted for final review.
- b. All outstanding compliance queries must be addressed before delivery. Hearst Compliance will verify the final cut prior to transmission or publication. Unresolved issues may result in rejection or delay.
- c. Where external legal advice has been sought on the fine cut, this advice should be shared with Hearst Compliance to aid their review.
- d. Around the time of the fine cut and prior to delivery, you should also discuss plans for press coverage, ensure any notification letters are sent, consider the impact of digital and social media content on contributors, and consult with Compliance on any ongoing duty of care that may be needed after broadcast.

### 3.7. Professional Conduct and Safe Working Environments

Hearst Networks expects all production partners to maintain high professional standards and to create respectful, safe working environments. This applies equally to staff, freelancers, contributors and members of the public encountered during production.

Content creators are expected to plan and deliver productions in a way that supports safe, lawful and respectful working practices. This includes having appropriate arrangements in place for safeguarding and duty of care, ensuring teams are properly briefed on their responsibilities, and addressing concerns promptly and responsibly if they arise during production.



Content creation can involve sensitive subject matters and high-pressure environments. Producers should ensure that decision-making remains consistent with Hearst Networks' expectations, particularly where vulnerable contributors or distressing subjects are involved.

Hearst Networks has partnered with Camilla Wells ([www.catchyourself.co.uk](http://www.catchyourself.co.uk)) as our recommended Trauma Recovery Coach. Camilla can support staff members who may have to deal with traumatic content when working on our documentaries. You can contact Camilla by email at [camilla@catchyourself.co.uk](mailto:camilla@catchyourself.co.uk).

### 3.8. Conflicts of Interest

Any actual or potential conflicts of interest must be disclosed to Hearst Networks at the earliest opportunity. This includes situations where a member of the production team has a personal, professional or financial connection to:

- i. A contributor, victim, family member or witness;
- ii. A person or organisation that may be criticised or featured in the production;
- iii. A brand partner, sponsor or commercial entity connected to the content; or
- iv. Any third party who may benefit from the editorial approach taken.

Early disclosure allows Hearst Networks to assess whether the conflict can be managed appropriately (for example, through additional safeguards) or whether changes are required.

### 3.9. Reporting Concerns and Speaking Up

Hearst Networks encourages an open culture where concerns can be raised early and without fear of repercussions. Content creators must ensure that their teams understand how to escalate concerns and who to speak to within Hearst Networks.

If a concern relates to contributor welfare, safeguarding, significant legal risk, allegations of misconduct, or any serious breach of these Guidelines, it should be escalated to the Director of Compliance as soon as possible.

### 3.10. Transparency and Record-Keeping

Ofcom investigations and legal challenges are evidence-based processes. In the event of a complaint, producers may be required to demonstrate how editorial decisions were reached, what evidence was relied upon, what steps were taken to ensure fairness and accuracy, and how potential risks were assessed and mitigated. For this reason, clear and well-maintained records are essential to evidencing responsible content creation and to protecting both contributors and the integrity of Hearst Networks' brands.

Producers must maintain clear and accurate records of:

- i. Risk assessments conducted at each stage of production;
- ii. Editorial decision-making relating to serious allegations, reconstructions, omissions or contextual choices;
- iii. Safeguarding and duty of care arrangements (including any welfare support provided);
- iv. Legal advice;
- v. Verification of key factual claims and supporting evidence relied upon;
- vi. Communications relating to right of reply and any responses received;
- vii. Contributor consent;
- viii. Complaints received (formal or informal), together with any remedial action taken; and
- ix. Post-broadcast issues, including corrections, clarifications or further escalation.

Records should be retained in a structured and accessible format so that they can be located quickly if required.

## 4. Compliance with the Ofcom Broadcasting Code

The sections above explain how Hearst Networks works with content creators to manage compliance and legal risk. The sections that follow set out the standards that content must meet.

We use the Ofcom Broadcasting Code as the primary framework for UK services, and we expect content to meet these standards as a minimum. The guidance below highlights common risk areas and practical steps to help avoid regulatory breaches, legal claims and avoidable harm to contributors or audiences. **Where issues are complex, sensitive or fast-moving, producers should escalate to Hearst Networks Compliance and seek legal advice as early as possible.**

### 4.1. Children and Young People

The Ofcom Broadcasting Code contains specific protections for people under 18. These protections operate in two distinct but related ways:

- i. Safeguarding children and young people who feature in content; and
- ii. Safeguarding children as members of the audience.

This section addresses both. Producers must consider not only whether content is suitable for younger viewers, but also whether the involvement of under-18s in production is appropriate, properly safeguarded and legally compliant.

[Section 1 of the Ofcom Broadcasting Code](#) sets out the rules designed to protect people under 18. These requirements apply regardless of the form of content, the platform on which it appears, or the nature of the consent obtained.

It requires that broadcasters ensure that children are appropriately protected from harmful or unsuitable material, primarily through careful scheduling and editorial judgement. It also places specific obligations on broadcasters where under-18s participate in content. Specifically, due care must be taken over their welfare and

dignity, and they must not be caused unjustified distress or anxiety, irrespective of parental consent.

The guidance below sets out how Hearst Networks applies these principles in practice, protecting children in our audiences while ensuring that young contributors are treated with care, respect and responsibility.

#### 4.1.1. Protecting Children as an Audience

The Ofcom Code places particular emphasis on the protection of under-18s. Material that might seriously impair the physical, mental or moral development of under-18s must not be broadcast at any time.

##### *i. Appropriate Scheduling*

The primary mechanism for protecting child audience members is appropriate scheduling or positioning of content not suitable for children.

The watershed is 9pm. Material unsuitable for children should not, in general, be shown before 9pm or after 5:30am.

In assessing suitability, producers should consider:

- a) The strength and frequency of potentially harmful material (e.g. strong language, violence, sexual content, distressing scenes);
- b) The tone and realism of the content;
- c) The likely composition of the audience at the time the content is shown;
- d) Whether content begins before and continues after the watershed; and
- e) The expectations associated with the channel and slot

The transition to more adult material after 9pm should not be abrupt. Particular care is required with opening sequences at or immediately after the watershed.

ii. Ensuring Appropriate Content

Content primarily made for children must not:

- a) Feature or glamorise illegal drugs, drug or solvent abuse, smoking or the misuse of alcohol (unless there is strong editorial justification);
- b) Feature excessive violence (whether verbal or physical) or dangerous behaviour that is easily imitable by children;
- c) Contain offensive language or material of a strong sexual nature;
- d) Feature exorcisms, occult practices or the paranormal; or
- e) Feature nudity, unless this is justified by the context.

iii. Content labelling

Where content may cause distress, offence, or be harmful to children, appropriate viewer information will be required. Content warnings and appropriate labelling (including any directions as to age suitability) should be clear and proportionate, and agreed with Hearst Networks Compliance in advance.

For broadcast content, warnings are not a substitute for appropriate scheduling. They are a complementary safeguard and should be used in conjunction with on-air warnings where appropriate.

Special care is required with promotional material and trailers, which viewers may encounter without context.

4.1.2. Content Featuring Children & Young People

Where under-18s feature in content prepared for Hearst Networks (whether as contributors, participants or incidental subjects), their welfare and dignity must be paramount.

Involving children in productions requires a heightened level of care. Content creators must ensure that their participation is appropriate, proportionate and responsibly handled at every stage.

**If you intend to feature children in your production, this should be discussed with your Hearst Networks Compliance contact as early as is possible.**

*i. Consent and understanding*

As a general principle:

1. Parental or guardian consent is required before filming with under-16s. While under Ofcom young people aged 16 and 17 can consent on their own behalf and sign their own consent forms, when a person under 18 still lives with their parents or a guardian we ask that a release form is also signed by the parent or guardian.
2. Wherever possible, the young person's own informed agreement should also be obtained alongside parental consent.
3. Consent must be meaningful. Contributors and families should understand:
  - a. The nature and purpose of the content;
  - b. The likely platforms and audience reach;
  - c. That filming does not guarantee inclusion; and
  - d. That final editorial control rests with Hearst Networks.
4. Particular care is required where the subject matter is sensitive or potentially reputationally damaging. Producers must ensure that the children and their parent or guardian are aware of the nature of the content and the associated risks.

*ii. Welfare, Risk Assessment and Safeguarding*

Content creators must take due care towards all under-18s featured in their production. Producers should follow the Guidance set out under Section One of the Ofcom Code.

At the point producers become aware of a child's involvement in a production, steps should be taken to assess:

1. The child's age, maturity and individual circumstances;
2. The sensitivity of the subject matter;
3. The level and duration of participation; and
4. The potential impact of publicity and social media exposure.

Depending on the circumstances, this may require a further welfare risk assessment and designated welfare lead within the production team.

**Any safeguarding concern in respect of a child arising during production or after broadcast must be escalated immediately in accordance with Hearst Networks' compliance procedures.**

*iii. Featuring under-18s in sensitive situations*

If a production plans to film or interview an under-18 about a controversial or sensitive topic, please take advice from your Compliance contact in advance. Steps must be taken to ensure that appropriate safeguards are in place. For example:

1. Ensure that a parent, guardian or appropriate chaperone is present when filming;
2. Ensuring that young people are not asked for views on issues they cannot comprehend. They should also not be encouraged to do things they would not have done otherwise; and
3. Ensuring that appropriate care is taken to respect the young person's requests. For example, if they express discomfort or indicate they no longer wish to discuss a certain topic, it may be appropriate to move on or cease filming.

Particular care is required where under-18s are filmed participating in, or discussing involvement in, antisocial or criminal behaviour. Production teams must not facilitate unlawful conduct. If criminal behaviour involving an under-18 is recorded or disclosed, the matter must be escalated immediately to Hearst Networks Compliance. Advice will

be provided on appropriate next steps, which may include anonymisation and additional safeguarding measures.

Where under-18s are involved in legal proceedings, strict reporting restrictions may apply. **Early legal advice is essential before including any details that might identify a child involved in legal proceedings. Please discuss these considerations with your Hearst Networks Compliance contact prior to filming.**

iv. Filming in locations where children are present

When filming in environments where children are likely to be present, including schools, homes, recreational facilities and certain public spaces, producers must consider:

1. Whether children are identifiable;
2. Whether parental, institutional or local authority consent is required;
3. Whether filming intrudes upon a reasonable expectation of privacy; and
4. Whether additional safeguarding measures are necessary

Care should always be taken in creating content featuring children or their stories. Children do not lose their privacy rights because of the profile of their family or the public interest in a wider story.

v. Child performers

Where content features a child in a performance context, a child performance licence may be required under applicable legislation.

Where a licence is required, statutory regulations impose conditions designed to safeguard the child's welfare, including limits on working hours, supervision requirements and provisions relating to education.

**Producers must seek early advice from Hearst Networks Compliance where a child may be participating in a performance role, as licence applications are subject to strict procedural requirements and timeframes.**

#### 4.1.3. Children and Young People: Practical Points to Consider

When working with under-18s, consider:

- i. Are we taking appropriate steps to protect the welfare and dignity of the child?
- ii. Has parental or guardian consent been obtained where required?
- iii. Could participation in the programme cause unnecessary distress, embarrassment or harm?
- iv. Have we considered whether additional safeguarding measures or specialist advice may be required?
- v. Does the programme avoid identifying children involved in legal proceedings or other protected situations?

**If you are unsure whether appropriate safeguards are in place, speak to your Compliance contact.**

## **4.2. Safeguarding and Vulnerable Contributors**

Safeguarding is a fundamental element of responsible content-creation. Hearst Networks expects all production partners to prioritise the welfare, dignity and safety of contributors, particularly where individuals may be vulnerable.

Vulnerability may arise from age, mental or physical health, personal circumstances, trauma, disability, language barriers, social isolation, involvement in legal proceedings, or the nature of the subject matter being discussed. Vulnerability may be situational and may change over time.

Ofcom's Broadcasting Code requires that due care is taken over the welfare and dignity of participants and that individuals are not caused unjustified distress or harm as a result of their involvement in content or its release. These obligations apply across all genres and formats.

Safeguarding is not limited to compliance with minimum legal standards. It requires thoughtful, proportionate and ongoing assessment of risk throughout the life of a production.

Hearst Networks expects producers to:

1. Identify potential vulnerabilities at the earliest stage of development;
2. Consider both physical and emotional welfare when planning filming;
3. Ensure contributors understand the nature and likely impact of their participation;
4. Avoid exploiting, pressuring or manipulating individuals for editorial effect; and
5. Keep welfare considerations under review as production evolves.

Safeguarding must inform editorial decisions, including decisions about tone, framing, editing and publicity.

Where contributors are discussing traumatic experiences, allegations of wrongdoing, sensitive medical matters, family breakdown, abuse, criminal conduct or other deeply personal issues, heightened safeguards will usually be required.

When filming with children or vulnerable contributors, producers should consider:

1. Whether a documented welfare risk assessment is appropriate;
2. Whether a designated welfare lead should be appointed within the production;
3. Whether independent specialist advice (for example, from a psychologist, counsellor or safeguarding adviser) is necessary;
4. Whether additional support should be made available before or after broadcast;  
and
5. The potential impact of social media exposure and press coverage.

Contributors should be given appropriate information about the scope of distribution and the potential for online reaction. Where appropriate, they should be directed to the Hearst Networks Social Media Guidelines for Contributors.

Welfare considerations do not end at transmission. Producers should consider what, if any, aftercare arrangements are appropriate in the circumstances.

Any safeguarding concern arising during production must be escalated promptly in accordance with Hearst Networks' Compliance Process Guide. **Where there is uncertainty about a contributor's capacity, vulnerability or the potential impact of participation, early discussion with Hearst Networks Compliance and/or Legal is expected.**

#### 4.2.1. Safeguarding and Vulnerable Contributors: Practical Points to Consider

When filming with vulnerable contributors, ask:

- i. Could participation cause harm, distress or reputational damage to the contributor?
- ii. Does the contributor fully understand the nature and potential reach of the content?
- iii. Are appropriate support measures in place before, during and after filming?



- iv. Have we considered the long-term impact of broadcast, including online exposure or social media attention?

**Early discussion with Compliance is recommended where vulnerability issues arise.**

### 4.3. **Harm and Offence**

Section 2 of the Ofcom Broadcasting Code requires broadcasters to apply generally accepted standards so that audiences are adequately protected from harmful or offensive material. In practice, this means that content which includes material capable of causing harm or offence must be editorially justified and presented with appropriate context.

Hearst Networks supports content that is entertaining, informative and trusted. Where content includes potentially harmful or offensive material, producers must consider whether the inclusion is necessary to the editorial purpose and whether the material is handled responsibly. Examples of potentially offensive material include:

- i. Strong language;
- ii. Sexual content;
- iii. Violence;
- iv. Graphic imagery including tattoos;
- v. Distressing themes;
- vi. References to suicide or self-harm;
- vii. Hate speech; and
- viii. Outdated or derogatory language.

Particular care is required where content may prompt audience concern about contributor welfare, or where the subject matter is sensitive, traumatic or likely to cause distress. Where appropriate, mitigations should be built into the content itself, rather than relying solely on warnings.

#### 4.3.1. **Context and Editorial Justification**

The Code requires that material which may cause harm or offence must be justified by the context in which it appears. Context is assessed by reference to a range of factors, including:

- i. The editorial purpose and genre of the content;
- ii. The nature and explicitness of the material;
- iii. The likely expectations of the audience;
- iv. The time and manner of broadcast;
- v. The level of harm and offence likely to be caused by the material; and
- vi. The information provided to viewers in advance.

Content creators should consider not only what is included, but how it is presented and whether audiences are adequately prepared for it. Content that may be acceptable in one context may not be acceptable in another.

Steps that can be taken to mitigate the likelihood of material causing harm and offence include appropriate scheduling and use of on-air warnings.

#### 4.3.2. Accuracy and Avoiding Materially Misleading Content

Ofcom also requires that factual content must not materially mislead the audience. This requirement extends beyond factual accuracy in a narrow sense. Audiences can be materially misled through:

- i. Selective or misleading editing;
- ii. Distortion of chronology;
- iii. Omission of significant facts;
- iv. Use of archive, graphics, reconstructions or AI-generated content without clear signposting;
- v. Presenting contested allegations as established fact.

Careful scripting, clear labelling and editorial integrity are essential to maintaining viewer trust and ensuring compliance.

Further information on viewer trust is set out in section 4.2 below. For further information on Hearst Networks' requirements for AI use, please see the AI Use Content Guidelines.

#### 4.3.3. Suicide, Self-Harm and Sensitive Themes

Depictions of, and references to, suicide and self-harm require particular care. Ofcom's rules include specific restrictions around showing or describing methods of self-harm or suicide. These details must not be included unless it is justified in the context of the content.

Producers should consider tone, repetition, level of detail and potential impact on vulnerable viewers. Depending on the circumstances, additional safeguards such as viewer warnings or signposting to support organisations may be appropriate.

#### 4.3.4. Violence, Dangerous Behaviour and Discrimination

Content must not condone or glamorise violent, dangerous or seriously antisocial behaviour. Caution is required where this kind of behaviour may be easily imitated.

Violence (whether real or simulated) should only be shown if it is justifiable in context. Similarly, use of alcohol and drugs should also only be featured if it is editorially justifiable. Smoking and the misuse of alcohol should generally not be depicted before the watershed or in content targeted at children, unless it is editorially justifiable.

Discriminatory treatment or language relating to protected characteristics (including race, gender, religion and disability) must be editorially justified and presented with sufficient context. The fact that language reflects real-life speech does not, on its own, make it appropriate.

Producers must also take care in the portrayal of real people in distress, humiliation or vulnerable circumstances, recognising that harm and offence may arise from the manner of depiction as well as the subject matter itself.

#### 4.3.5. Sexual Content and Nudity

Sexual content and nudity must always be editorially justified and defensible in context. Particular care is required for programmes planned to transmit before the 9pm watershed, and nudity in a sexual context is unlikely to be acceptable pre-watershed.

Representations of sexual intercourse must not be included in pre-watershed content unless there is a serious educational purpose. Other sexual behaviour or verbal references to sex before 9pm must be appropriately limited, inexplicit and justified by context.

After the watershed, more explicit sexual material and nudity may be justified depending on context, tone, scheduling and audience expectation. However, the most explicit content should be reserved for later in the schedule, and clear warnings should be considered where appropriate.

In all cases, producers should consider the level of detail, the way material is framed, and the likely impact on audiences.

#### 4.3.6. Offensive Language

The use of offensive language is one of the most common sources of Ofcom complaints. Decisions about including it must therefore be made carefully, with close regard to context, scheduling and audience expectation.

Ofcom distinguishes between different levels of language (for a detailed assessment, see [Ofcom Quick Reference Guide to Public Attitudes Towards Offensive Language on TV and Radio](#)). The most offensive language should not be broadcast before the 9pm watershed, regardless of editorial justification.

Less offensive language may be included before the watershed only where it is justified by the context and does not exceed audience expectations, and frequent use should be avoided.

After 9pm, the acceptability of offensive language will depend on a range of contextual factors, including its strength and frequency, the way in which it is used, the genre of content and the time of transmission.

Particular care is required in opening sequences immediately after 9pm, where viewers may encounter content without prior warning. The inclusion of very strong language at the start of a programme requires clear editorial justification.

Where strong or very strong language is justified, clear audience warnings will be considered. Warnings support informed viewing but are not a substitute for appropriate scheduling or careful editorial judgement when the content is in production. Producers should also consider the cumulative effect of repeated language, including in repeats, compilations and promotional material.

**If in doubt as to the use of potentially offensive language, content creators should consult with their Compliance contact at an early stage.**

#### 4.3.7. Exorcism, the occult and paranormal

Where content features exorcism, occult practices, paranormal activity or divination that are presented as real, they must be handled carefully and responsibly. Such material should not be presented as proven fact without question, and producers should consider whether viewers are given appropriate context. If the material is included purely for entertainment, this should be made clear to audiences.

Producers should also bear in mind the additional care required where children may be watching (see section 4.1 above).

If this type of material forms a significant part of content, it should be discussed with the Hearst Networks Compliance team at an early stage.

Content relating to aliens or UFOs does not fall within Ofcom's definition of "*paranormal*" for the purposes of these rules, and the above provisions therefore do not apply to such content. For specific guidance on programming discussing aliens or UFOs, please refer to the Hearst Networks Aliens and UFO Guidance Notes.

Any content featuring hypnosis must be handled carefully to avoid causing adverse reactions. A hypnotist must not perform a full routine on air or address viewers directly in a way that could be seen to induce hypnosis. Similarly, content must not feature subliminal or similar techniques designed to influence viewers without their awareness.

#### 4.3.8. Photosensitive Epilepsy

Television content must also comply with Ofcom's guidance on flashing images to minimise risks to viewers with photosensitive epilepsy. Where the use of flashing lights is editorially justified and cannot reasonably be avoided, appropriate warnings should be given at the start of the content.

**If your content will contain flashing images, this should be identified to your Hearst Compliance contact at an early stage so that appropriate technical safeguards can be discussed.**

#### 4.3.9. Harm and Offence: Practical Points to Consider

When assessing potentially offensive material, ask:

- i. Is the inclusion of the material editorially justified by the context?
- ii. Is the content scheduled appropriately for its likely audience?
- iii. Would warnings, signposting or context help viewers understand or contextualise the harmful material?
- iv. Could the content cause unjustified distress or offence?

**If the material involves strong language, violence or sexual content, you should discuss these elements with your Compliance contact at an early stage**

#### 4.4. Crime, Disorder, Hatred and Abuse

Section 3 of the Ofcom Code requires that broadcasters ensure that content does not encourage or incite crime, disorder or serious antisocial behaviour. The Code also restricts the inclusion of hate speech or abusive or derogatory treatment of individuals or groups unless this is clearly justified by the context.

Content can legitimately explore crime, controversial views and difficult subject matters, particularly in documentary, investigative and factual content. However, such material must be handled responsibly and presented in a way that does not appear to condone, promote or glamorise harmful behaviour.

In applying these standards, producers should consider how audiences are likely to interpret the material and whether sufficient context is provided to make the editorial purpose clear.

##### 4.4.1. Incitement of Crime and Disorder

Content can depict criminal activity where this is editorially justified.

In practice, content creators should consider:

- i. Whether criminal activity is shown in a way that would allow the audience to imitate it;
- ii. Whether the behaviour is presented in a way that appears glamorous, consequence-free or aspirational;
- iii. Whether the content provides appropriate context or consequences for the criminal behaviour shown; and
- iv. The potential impact on victims or those affected by the crime.

Issues can arise, for example, where content shows or describes in detail how a crime was carried out, follows individuals engaged in illegal activity, or presents criminal behaviour primarily for entertainment without sufficient context.

These rules don't mean that you can't depict criminal behaviour. However, it's important to ensure you offer a balanced look at the behaviour covered and offer appropriate challenge.

**Where criminal techniques or illegal conduct form a significant part of content, you should discuss this with your Compliance contact at an early stage.**

#### 4.4.2. Hatred, Abuse and Extremist Content

The Ofcom Code also restricts the inclusion of material that contains hate speech or abusive or derogatory treatment of individuals or groups on the basis of protected characteristics such as race, religion, nationality, disability, gender or sexual orientation.

This kind of material may sometimes be included for legitimate purposes, for example, in documentary or investigative content examining extremist movements or discriminatory historical attitudes. In these cases, producers must ensure that the material is clearly contextualised and does not appear to endorse or promote the views expressed.

When dealing with potentially abusive or discriminatory material, producers should consider:

- i. whether the editorial purpose of including the material is clear;
- ii. whether the programme challenges, interrogates or contextualises the views expressed; and
- iii. whether the inclusion of the material could cause unnecessary harm or offence to audiences.

Content must not promote extremist views or organisations or include material likely to incite hatred or violence.

#### 4.4.3. Crime Content and Contempt of Court

Content that relates to criminal suspects, active investigations or ongoing court proceedings may raise legal risks under the law of contempt of court.

Under UK law, it is a criminal offence to publish material that creates a substantial risk of serious prejudice to active criminal proceedings. This rule exists to ensure that defendants receive a fair trial and applies regardless of whether a person or organisation intended to influence the outcome of the proceedings.

Criminal proceedings are generally considered “active” from the point at which a person is arrested, charged, or a court summons or arrest warrant is issued. Proceedings usually cease to be active once the case has concluded, for example when the defendant is acquitted, sentenced or the case is discontinued.

Content may create legal risks if it:

- Suggests that a suspect or defendant is guilty before the court has determined the case;
- Discusses alleged confessions, previous convictions or other material that may be prejudicial;
- Interviews potential witnesses about their evidence before a trial; or
- Broadcasts footage or commentary that could influence how a jury might view the case.

Content may also create legal issues if it identifies individuals who are legally protected by anonymity (for example, alleged victims of sexual offences), or presents allegations as established fact where criminal proceedings are active or reasonably anticipated.

Particular care is required when content discusses:

- i. Ongoing police investigations;
- ii. Suspects who have been arrested or charged; or
- iii. Criminal cases that may still come before a court.

**Where content concerns recent or ongoing criminal matters, producers should seek legal advice and inform their Compliance contact at an early stage.** In some

cases, steps such as removing identifying details, avoiding discussion of key evidence, or delaying release may be necessary to reduce legal risk.

#### 4.4.4. Payments to Criminals and Witnesses

The Ofcom Code also places strict limitations on payments to individuals involved in criminal proceedings.

As a general rule, payments must not be made to convicted or confessed criminals for contributions relating to their crimes. The only exception is where a payment is clearly justified in the public interest, for example, where it enables the investigation or exposure of serious wrongdoing.

Where criminal proceedings are active, payments must not be made to witnesses or to individuals who may reasonably be expected to be called as witnesses. Payments must not be offered or structured in a way that could influence the outcome of a trial.

Even where proceedings are not yet active, producers should exercise caution. If criminal proceedings are likely or foreseeable, payments should generally not be made to individuals who may later be called as witnesses unless there is a clear public interest, and the payment is necessary to obtain important information. In such circumstances, it may later be necessary to disclose the existence of the payment to both the prosecution service and the defence.

**Producers should always discuss any proposed payments to contributors involved in criminal matters with their Compliance contact before taking any action.**

Further guidance on the specific risks associated with crime-related programming is set out in Section 5.1 (True Crime) below.

## 4.5. Religion

Section 4 of the Code sets out rules relating to content of which religion or religious belief is a central part. These rules are intended to ensure that religious content is handled responsibly and that audiences are not misled or improperly influenced.

Religion is a subject that can give rise to strongly held and deeply personal views. Programmes exploring religious beliefs, practices or communities should therefore approach the subject with appropriate care and sensitivity, while recognising that robust discussion, criticism and debate are legitimate parts of public discourse.

In most cases, the key consideration is whether the content treats the religion fairly, accurately and with appropriate context.

### 4.5.1. Respectful Treatment of Religious Beliefs

Religious views and beliefs must not be subject to abusive treatment in content where religion is a significant theme.

This does not prevent content from examining or questioning religious practices, beliefs or institutions. Documentary, factual and historical content may legitimately explore controversial aspects of religion or present differing viewpoints. However, you must avoid gratuitous ridicule, misrepresentation or unjustified disparagement of religious beliefs or those who hold them.

Producers should take care to ensure that contributors are accurately represented and that the content does not create a misleading impression of a particular religion, denomination or belief system.

#### 4.5.2. Transparency and Editorial Context

Where religion forms a significant part of content, viewers should be able to clearly understand:

- i. What the content is about;
- ii. The perspective from which it is being presented; and
- iii. The role and background of any contributors discussing religious beliefs.

Religious views must not be promoted by stealth. For example, content should not present material in a way that disguises an attempt to promote or recruit viewers to a particular religion. Simply shining a light on the positive or life-affirming nature of a belief featured in content would not be considered 'recruitment' in this context.

In factual programming, it is also important that claims made by contributors (particularly claims relating to a living person having special powers, miracles or supernatural abilities) are presented with appropriate editorial context. This is particularly important where vulnerable audiences may be affected. You should avoid presenting such claims uncritically as established fact and should ensure that viewers are given sufficient context to understand the nature of the claims being made.

In addition, content with a focus on religion must not improperly exploit the susceptibilities of audiences, for example by suggesting that viewers may suffer negative consequences if they do not adopt a particular belief or take a particular action.

When developing content that explores religious themes, production teams should consider:

- i. Whether the content clearly explains the context and purpose of the discussion about the religion;
- ii. Whether religious beliefs or practices are represented accurately and fairly;
- iii. Whether contributors' claims are presented with appropriate editorial scrutiny or balance; and

- iv. Whether the content could reasonably be perceived as promoting or recruiting for a particular belief system.

#### **4.6. Due impartiality and due accuracy**

*The Ofcom rules on due impartiality apply only where content deals with matters of political or industrial controversy or major matters relating to current public policy. While the majority of Hearst Networks content will not engage these rules, content creators should be aware of them where content addresses politically or socially contentious issues.*

It is a legal requirement that broadcasters must ensure that:

- i. News content;
- ii. Content featuring matters of political or industrial controversy; and
- iii. Matters relating to current public policy

are reported with due accuracy and presented with due impartiality. This requirement is incorporated into Section 5 of the Code and applies only to content that deals with these sensitive topics.

These requirements exist to protect audience trust in our content on matters relating to news, politics or public policy. Viewers should be able to rely on Hearst Networks content to present factual material accurately and to treat controversial subjects in a fair and responsible way.

The concept of “due” impartiality is important. It does not require that every viewpoint is given equal weight, nor that opposing views are presented within each episode or series. Instead, the level of balance required will depend on the nature of the subject matter, the format of the programme and the expectations of the audience.

For factual and lifestyle content, these issues will likely arise only occasionally. However, where content touches on politically or socially controversial issues, producers must ensure that the treatment of those issues meets the standards set out in this Handbook.

#### 4.6.1. Accuracy and Editorial Integrity

Factual content must not materially mislead audiences. This applies not only to documentaries and investigative content, but to any content that presents information as fact.

Content creators should ensure that:

- i. Factual claims are supported by reliable sources or evidence;
- ii. Statistics, archive material and quotations are used accurately and in their proper context;
- iii. Reconstructions or illustrative sequences do not create a misleading impression of events; and
- iv. AI-generated content is only utilised transparently and in accordance with the standards set out in the AI Use Content Guidelines.
- v. Accuracy also requires careful fact-checking throughout production and editorial review before transmission. Where uncertainty exists around a factual claim, this should be made clear within the content. Responsibility for fact checking lies with the production team. Hearst Networks Compliance assumes that all content has been fully fact checked prior to rough and fine cut reviews.

Maintaining strong research and verification processes is an important part of protecting viewer trust in content made for Hearst Networks.

#### 4.6.2. Due Impartiality and Controversial Subjects

Impartiality issues most commonly arise where content deals with matters of political controversy or public policy debates. Examples may include discussions about

government policy, public health issues, environmental regulation, scientific issues or other issues that could generate significant public debate.

In these circumstances, producers should consider whether the content gives audiences sufficient context to understand that different viewpoints exist.

Due impartiality can be achieved in a variety of ways, including:

- i. Reflecting a range of relevant perspectives across a piece of content or series;
- ii. Including informed contributors with differing views;
- iii. Ensuring that commentary or analysis is clearly presented as opinion.

The appropriate approach will depend on the format of the content. For example, a documentary examining a particular campaign group or perspective may be justified, provided the content does not materially misrepresent opposing views or present opinion as established fact.

If a series deals with the same subject throughout, due impartiality can be achieved across the series, rather than simply in one episode.

#### 4.6.3. Views of Presenters and Politicians

Presenters of non-news content may express their own views on public policy or other politically significant issues, but you should ensure these are appropriately balanced with alternative viewpoints. If a conflict of interest arises (for example, if a presenter has strong connections to a political party or owns a company that is the focus of the content), this should be flagged to your Compliance contact and made appropriately clear to the audience.

Politicians must not be used in 'news content' as presenters, interviewers or reporters, unless it can be editorially justified. 'News content' is content that is primarily focused on delivering news and can be distinguished from 'lifestyle content', which may touch on current affairs but is primarily focused on entertainment, culture, or subjects of general interest.



Generally, sitting politicians should not be paid for a contribution.

#### 4.6.4. When to Seek Advice

Early discussion with your Compliance Contact is recommended where content:

- i. Addresses politically controversial subjects or public policy debates;
- ii. Features contributors advocating potentially controversial or partisan views;
- iii. involves investigative claims relating to public institutions or government bodies; or
- iv. May be shown during a period of heightened political sensitivity.

**If you become aware of an error in content you have produced after it has been released, you should seek advice from your Compliance contact as soon as possible.**

Further guidance on election-specific requirements is provided in Section 4.8 below (Elections and Referendums).

#### 4.7. Viewer Trust

Audiences should be able to trust that Hearst Networks content present people, events and facts in a fair and truthful way. Editing and creative choices are a normal and necessary part of making content, but they must not create a materially misleading impression of events or of the views expressed by contributors.

This principle applies across all types of content on Hearst Networks, including documentaries, factual entertainment, lifestyle, reality-based content and all promotional material. While editorial decisions to improve storytelling are an important part of programme making, producers and editors should ensure that the narrative created in the edit reflects the substance of what actually occurred.

Maintaining viewer trust requires careful consideration of how interviews, archive material, reconstructions and narrative devices are used throughout content and promotional material.

##### 4.7.1. Avoiding Misleading Editing

Editing becomes problematic where it alters the meaning of what happened or what someone said.

Producers and editors should take care to avoid:

- i. Editing interviews in a way that changes the meaning of a contributor's remarks;
- ii. Using reactions or cutaway shots in a way that suggests events played out differently or in another order;
- iii. Compressing timelines in a way that misrepresents how events unfolded;  
and
- iv. Editing material together in a way that implies a relationship between events that did not exist.

Narrative techniques such as time compression, montage and illustrative sequences can be appropriate, but they should not be used to create a materially misleading impression.

#### 4.7.2. Reconstructions and Re-enactments

Reconstructions and re-enactments can be a useful way to illustrate events that were not filmed. However, they must be presented clearly so that viewers understand that the material is recreated or illustrative rather than original footage.

Where reconstructions are used, content creators should ensure that:

- i. The sequence does not appear in a way that suggests it is genuine archive or observational footage;
- ii. The reconstruction is consistent with the available evidence; and
- iii. The reconstruction does not introduce unverified elements.

Clear labelling or visual cues can be an appropriate way to ensure that audiences understand that a reconstruction is being shown. Not all reconstructions need to be labelled - this is only necessary where viewers might not realise they are watching one.

Simulated news content (for example in drama or reconstructions) must be clearly presented so that viewers are not misled into believing it is genuine news.

Any use of AI in reconstructions must be carefully considered and comply with the standards set out in the AI Use Content Guidelines.

#### 4.7.3. Use of Archive Material and Context

Archive footage, photographs and audio recordings must be used accurately and in their proper context. Material should not be repurposed in a way that creates a misleading impression of the events being shown.



For example, producers should avoid using archive images to illustrate an event if those images relate to a different incident, location or time period. Similarly, captions, voiceover and any graphics used should accurately reflect the source and date of archive material.

AI must not be used misleadingly or in a way that falsifies history or manipulates the truth, Any use of AI-generated material must comply with the standards set out in the [AI Use Content Guidelines](#).

#### 4.7.4. Fact checking

When producing factual content, you must ensure that all facts and allegations in the production are factually accurate. This includes claims made by contributors, which must be suitably fact checked and/or corroborated. Hearst Networks is not responsible for fact checking content as part of the compliance process.

#### 4.7.5. Treatment of and Payments to Contributors

Contributors should not be misled as to the context or purpose of their contribution. Content creators should ensure that contributors understand the nature of the content and how their contribution may be used so that it is not presented in a misleading way.

In many circumstances, content creators may offer payments or expenses to contributors. While this can be legitimate, care must be taken to ensure that such arrangements do not undermine editorial integrity or create the perception that a contributor's account has been influenced by financial incentives.

Specific restrictions apply in relation to payments connected to criminal matters, as set out in Section 4.4.4 above.

**Any proposed payments to contributors should be discussed with Hearst Networks Compliance where there is any risk that the payment could affect the credibility or reliability of the contribution.**

**Any concerns about viewer trust should be raised with your Compliance contact at the earliest opportunity.** Early discussion can help ensure that editorial storytelling techniques remain clear, fair and defensible.

#### 4.7.6. Viewer Trust: Practical Points to Consider

When shaping content in the edit, consider:

- i. Could editing change the meaning of what a contributor said or did?
- ii. Are we presenting reconstructions or staged material to the audience in a clear and transparent way?
- iii. Does the content give an accurate impression of events, timing and context?
- iv. Are contributors being represented fairly and honestly?

**If an editing decision could significantly affect how a contributor or event is portrayed, this should be discussed with Compliance at the earliest opportunity.**

## 4.8. Elections and Referendums

The Code applies additional rules to content during election and referendum periods in the UK. These rules are designed to ensure that broadcasters maintain appropriate impartiality and do not give undue prominence to particular political parties, candidates or campaign positions.

Hearst Networks does not typically produce content that focuses directly on elections or referendum campaigns and so this guidance may not be relevant to your production. However, these rules are relevant where contents touch on political issues, include political contributors or are scheduled during an election period.

Content creators should therefore be aware that additional compliance considerations may apply during these periods, even where politics is not the central focus of the content.

### 4.8.1. Special Requirements During Election Periods

Once an election or referendum has been called, stricter impartiality requirements apply to broadcast content. During this period, broadcasters must take particular care to ensure that political parties, candidates and campaign positions are treated with appropriate fairness.

Issues may arise where content:

- i. Features political candidates or elected representatives;
- ii. Discusses issues that form part of an active election campaign; or
- iii. Includes commentary that could be interpreted as supporting or opposing a political party or campaign.

Even where content is not intended to be political in nature, the inclusion of political figures or campaign-related issues during an election period may require careful consideration.



**If content is likely to be released during an election or referendum period and includes political content or political contributors, producers should consult Compliance at an early stage. Compliance can advise on whether the additional requirements of the Ofcom Code are engaged and whether any editorial adjustments or scheduling considerations may be required.**

#### 4.9. Fairness, Consent and Duty of Care

Hearst Networks expects that individuals and organisations featured in its content are treated fairly. The Ofcom Code requires that our content avoids unjust or unfair treatment of individuals or organisations. This includes ensuring that contributors understand the nature of their participation, that they are not misled about how their contribution will be used, and that they are given an appropriate opportunity to respond where serious allegations are made about them.

Fair treatment of contributors is a fundamental principle of responsible content making. It supports audience trust, protects contributors from unnecessary harm and helps ensure that content is editorially robust and defensible.

These considerations apply at all stages of production, from initial contact with contributors through filming, editing and broadcast.

##### 4.9.1. Fair Treatment of Contributors

Contributors should be treated with honesty and respect throughout the production process. Content creators should ensure that individuals are approached about the production transparently and that their participation is obtained in a way that allows them to make an informed decision about taking part.

Contributors should not be misled as to the nature of the content or the purpose of their participation. In particular, producers should take care that contributors understand:

- i. The general subject matter of the content;
- ii. The nature of their proposed contribution;
- iii. How their contribution may be used in the finished content; and
- iv. As production progresses, whether there any proposed significant changes to the content that might reasonably impact their original consent to participate.

Particular care should be taken when dealing with individuals who may be unfamiliar with television production or who may not fully understand how their contribution could be edited or contextualised.

Any guarantees given to contributors regarding anonymity or confidentiality should be honoured throughout production. Production teams should ensure contributors understand how they will appear and, where appropriate, check in prior to release.

#### 4.9.2. Informed and Ongoing Consent

Consent is a key safeguard in ensuring fair treatment. In most cases, contributors must provide informed consent to participate in content for Hearst Networks.

Informed consent means that contributors understand the nature of the content, the purpose of their participation and the potential audience for the content.

Consent should not always be treated as a one-off administrative step. Where circumstances change significantly during production, or where the editorial direction of content evolves in a way that materially affects a contributor's participation, producers should consider whether it is appropriate to revisit consent.

Written contributor agreements and release forms should be obtained where appropriate and retained as part of the production records.

#### 4.9.3. Withdrawal of Consent

If a contributor indicates that they would like to withdraw their consent to participate, this should be taken seriously and considered carefully. Withdrawal of consent does not automatically mean that existing material featuring the contributor cannot be used, but it may raise issues of fairness, privacy and duty of care.

In these circumstances, producers must:

- i. Notify their Hearst Networks Compliance contact at an early stage.
- ii. Review the available records (including contributor agreements, correspondence and footage) to confirm that informed consent was originally properly obtained;
- iii. Check that no misleading assurances were given to the contributor regarding the nature of the content, their participation or how their contribution would be used;
- iv. Seek to understand the reasons for the request and, where appropriate, address any misunderstandings or concerns (for example by clarifying the editorial context in which the material will be used);
- v. Consider whether there are any new safeguarding, welfare or duty of care issues that may affect the original consent; and
- vi. Assess the nature of the material filmed, including whether it is particularly private, sensitive or involves special category personal data, and whether continued use would be justified in the editorial and public interest.

Where concerns are identified, producers should consider appropriate mitigation, which may include editing, anonymisation or removal of the material. Where no such concerns arise and informed consent has been properly obtained, it may be appropriate to proceed with the use of the material.

**Any decision to proceed in the absence of ongoing consent should be discussed with Hearst Networks Compliance and, where appropriate, legal advice should be sought.**

#### 4.9.4. Contributors Who May Lack Capacity

Particular care is required where contributors may lack the capacity to give fully informed consent, whether because of age, vulnerability, illness or other personal circumstances.

In these situations, producers should consider whether additional safeguards are required, which may include involving a parent, guardian, carer or other responsible

adult or seeking consent on an ongoing basis. Producers should also consider whether participation is appropriate in the circumstances and whether the contributor's welfare may be affected by the filming or release of the content.

**If you plan to work with a contributor who may lack capacity, please inform your Compliance contact at the earliest opportunity.**

Further guidance on working with children is provided in Section 4.1, and additional safeguarding considerations are set out in Section 4.2.

#### 4.9.5. Right of Reply

Where content makes allegations of wrongdoing or incompetence, or any other significant allegations about an identifiable individual or organisation, fairness also requires that they are given an appropriate opportunity to respond.

In many cases this will involve contacting the individual or organisation in advance of broadcast and offering them a reasonable opportunity to comment on the allegations being made.

The right of reply request should:

- i. Clearly explain the nature of the content and the context in which the individual or organisation will be referred to;
- ii. Set out the specific allegations or issues that relate to the individual and organisation;
- iii. Indicate the form of response sought (for example, an interview or written statement);
- iv. Provide sufficient background information to allow the subject to understand the substance of the concerns being raised;
- v. Provide a reasonable deadline for response, taking into account the seriousness of the allegations and production timetable; and
- vi. Include contact details for a designated contact in the production company.

What constitutes a reasonable timeframe for a response will depend on the seriousness of the allegations and the circumstances in which the right of reply request is made, including how quickly a response could reasonably be expected.

Content creators should ensure that requests for comment are made at an appropriate stage in the editorial process. Approaching someone too early may lead to confusion about the scope of the allegations, while leaving the request too late may not provide a fair opportunity to respond.

Where an individual or organisation declines to participate or does not respond, this should normally be reflected fairly in the content. Producers should ensure they keep clear records of attempts to contact individuals for comment.

How the response should be included depends on the circumstances and the editorial context of the content. Responses may be included within the content itself or reflected in the narration or editorial framing. Content creators should ensure responses are accurately included and that no material part of the response is excluded.

#### 4.9.6. Representing the Views of Non-Participants

Where content includes criticism of an individual or organisation who has chosen not to participate, reasonable steps should be taken to ensure that their position is represented fairly.

This may include summarising their publicly stated position, including a written statement, or reflecting their perspective through narration or other editorial context.

The aim should be to ensure that the audience is able to understand the relevant viewpoints, even where the individual concerned has not taken part in the content.

#### 4.9.7. Misrepresentation and Deception

In most circumstances, contributors should be approached openly and honestly about the nature of the content.

The use of misrepresentation or deception in order to obtain material raises significant compliance considerations and should only be contemplated where there is a strong editorial justification, such as exposing serious wrongdoing or matters of significant public interest.

If an individual or organisation is recorded without informed consent are not identifiable in any way then consent might not be required.

**Where any misrepresentation or deception is being considered, the matter must be discussed with your Compliance contact at an early stage.**

#### 4.9.8. Duty of Care

Content creators have a responsibility to consider the welfare of contributors throughout the production process. This includes considering the potential impact of participation both during filming and after broadcast.

Producers should think carefully about whether participation may cause unnecessary distress, reputational harm or other adverse consequences for contributors. Where content deals with sensitive subject matter or involves potentially vulnerable individuals, additional support or safeguards may be appropriate.

Further guidance on safeguarding and contributor welfare is set out in Section 4.2 above.

#### 4.9.9. Proper Consideration of the Facts

Before release, content creators should take reasonable care to ensure that content dealing with real events or identifiable individuals or organisations does not present material facts in a way that is unfair.

This includes considering whether relevant facts have been presented accurately and in appropriate context, and whether the omission of important information could result in a misleading or unfair impression.

4.9.10. Fairness: Practical Points to Consider

Throughout the production process, ask:

- i. Have we taken reasonable steps to ensure that material facts have not been omitted or misrepresented?
- ii. Have individuals criticised in the content been given an appropriate opportunity to respond?
- iii. Have we provided sufficient information for the subjects of any allegations to understand them?
- iv. Have we kept a record of right of reply requests and responses received?

**If serious allegations are made about an identifiable person or organisation, you should obtain legal advice as required and notify your Compliance contact as soon as possible.**

#### 4.10. **Privacy**

Content creators must respect the privacy of all individuals who feature or are referred to in content made for Hearst Networks. As a general rule, you should seek a person's consent before revealing their private information. Private information can include, but is not limited to:

- i. Information about a person's home, family life or personal relationships;
- ii. Contact details or information revealing the location of someone's home;
- iii. Information relating to a person's health, medical treatment or wellbeing;
- iv. Information about finances or employment;
- v. Information relating to grief, distress or personal trauma; and
- vi. Images or recordings captured inside private spaces, such as homes, workplaces or medical settings.

Revealing private information without consent may constitute an infringement of privacy and must be justified by the editorial context.

Privacy issues can arise in a wide range of content, including factual content, documentary and reality formats. For this reason, content creators must consider privacy implications throughout the production process, from planning and filming through to editing and broadcast. Any infringements of privacy must be justifiable with reference to the public interest.

##### 4.10.1. **Reasonable Expectation of Privacy**

When assessing potential privacy issues, the key question is whether the person in question had a reasonable expectation of privacy in the circumstances. A person may have a reasonable expectation of privacy in relation to information about their private life, their home, their health, their personal relationships or other sensitive personal matters.

Whether such an expectation exists will depend on the circumstances, including the location, the nature of the activity being filmed and the level of public exposure that might reasonably be expected.

For example, individuals will normally have a stronger expectation of privacy:

- i. In their home or other private spaces;
- ii. In situations involving medical treatment, grief or distress;
- iii. In relation to sensitive personal or family matters.

Even where individuals are filmed in public places, privacy considerations may still arise if the subject matter involves sensitive personal information.

Care should also be taken when revisiting events that have previously received media attention. Even where an incident has already been reported publicly, individuals involved may still retain a reasonable expectation of privacy when the events are revisited in future content. This is particularly relevant where significant time has passed or where content refers to convictions that may be spent.

Hearst Networks always expects producers to consider whether it is proportionate and appropriate to link an individual to a historic crime. Careful consideration should be given to whether naming or otherwise identifying the individual is editorially justified, taking into account the nature of the offence, the time that has passed and the potential impact on the individual.

**Where there is any doubt, producers should consider whether anonymisation or removal of identifying details is appropriate and should seek guidance from Hearst Networks Compliance and legal advice as appropriate.**

#### 4.10.2. Filming in Public and Private Locations

Recording individuals in public places without their consent will often be acceptable where individuals are not the focus of the recording, and no private information is disclosed. Provided individuals appear only incidentally and are not shown in any

particularly negative way, you do not need to obtain their express consent to record them.

However, where identifiable individuals are featured in a way that could affect their privacy, producers should consider whether consent is required. This includes, for example, close up shots of children or adults where you do not have their consent, or shots of intimate moments taken in public.

Recording in private spaces such as homes, workplaces, or other restricted locations will usually require the consent of those shown.

Content creators should take particular care when recording in sensitive locations, such as hospitals, ambulances, schools, prisons or police stations. In these environments, separate consent will usually be required from individuals who are identifiable and involved in sensitive situations.

As a general principle, vehicle registration plates that are shown in public spaces do not constitute private information and do not need to be blurred or removed. However, if circumstances change and including a registration plate could reasonably lead to the identification of a person in a way that raises privacy concerns (for example, where the vehicle is linked to a private address or sensitive situation), content creators should consider whether it is appropriate to blur or remove the registration plate.

#### 4.10.3. Secret Filming or Recording

Secret or covert filming and recording raises significant privacy considerations and should only be used where there is a clear editorial justification and approval has been granted by Hearst Networks in advance.

Filming or recording is considered secret where it takes place without a person's knowledge, including where recording devices are concealed, or where recording continues after a contributor has requested that it stop.

These techniques involve a significant intrusion into privacy and so will only be justified in limited circumstances. In general, covert filming may be considered where it is

necessary to investigate or expose serious wrongdoing, criminal activity or matters of significant public interest, and where the material could not reasonably be obtained by other means.

Where a person asks for filming or recording to stop because of privacy concerns, producers should normally respect that request unless there is a clear and justified editorial reason to continue filming.

Similarly, where telephone conversations are recorded for possible broadcast, the person being recorded should normally be informed at the start of the call that it is being recorded and may be broadcast.

**Where covert filming or recording is being considered, the proposal must be discussed with Hearst Networks Compliance at an early stage and approval must be obtained before any such filming takes place.**

#### 4.10.4. Children and Privacy

Particular care should be taken in relation to the privacy of children. Children do not lose their rights to privacy simply because of the actions or status of their parents or because they are present in public places.

Where children or vulnerable people are featured in content in a way that may affect their privacy, producers should carefully consider whether parental consent is required and whether the inclusion of the material is justified.

Children and vulnerable individuals should not normally be questioned about private matters without the consent of a responsible adult unless there is a clear editorial justification.

Further guidance on content featuring children and young people is provided in Section 4.1 above.

#### 4.10.5. Intrusive Filming Techniques and Pre-Existing Material

Some filming methods and sources of footage may raise additional privacy considerations. These may include:

- i. Drone footage;
- ii. Body-worn cameras;
- iii. CCTV or security footage; and
- iv. Material recorded by third parties “user generated footage”.

Where such material is used, producers should consider whether the individuals concerned had a reasonable expectation of privacy in the situation and whether the use of the material is justified by the editorial context.

Where footage, audio or other material originally recorded for one purpose is reused in different content, producers should consider whether the new use could give rise to a privacy concern.

Material should not be reused in a way that creates an unwarranted intrusion into the privacy of the individuals involved, particularly where the context of the new content differs significantly from the circumstances in which the material was originally recorded.

**Any plans to use intrusive filming techniques must be discussed with your Compliance contact at an early stage.**

#### 4.10.6. Doorstepping

“Doorstepping” is where an individual is approached for an interview without prior notice outside their home or workplace.

This technique should generally be avoided and must only be used in very limited circumstances. For example, where:

- i. A request for an interview has already been refused;

- ii. It has not been possible to request an interview in advance; or
- iii. There is good reason to believe that approaching the subject openly would frustrate the investigation.

**Any plans to use ‘doorstepping’ techniques should be discussed with your Compliance contact in advance.**

#### 4.10.7. Privacy of Third Parties

Content creators should take care where contributors discuss or disclose private information about third parties who are not participating in the production.

Contributors may, for example, share stories about friends, family members, colleagues or other individuals that reveal sensitive personal information. This may raise privacy concerns where the individual concerned is identifiable, even if they are not named directly.

Private information disclosed in this way might include details relating to a person’s health, family circumstances, personal relationships, financial situation or other aspects of their private life. For example, a contributor might refer to a family member’s medical condition or disability, describe a private dispute involving a neighbour, or discuss a colleague’s personal circumstances.

Where such information is included in a production, content creators should consider whether the individual concerned could reasonably be identified and whether their privacy may be infringed by the disclosure. In these circumstances, it may be appropriate to obtain consent or edit the material so that the individual cannot be identified.

Where sensitive personal information about identifiable third parties is included without their participation or consent, content creators should ensure that the editorial justification for doing so is carefully considered and documented.

#### 4.10.8. Confidential Information

In addition to privacy considerations, content may raise issues relating to confidential information. Confidential information is information that has been shared in circumstances where there is an expectation that it will not be disclosed without permission.

This may arise where contributors discuss information obtained through their employment, professional roles, contractual relationships or other confidential settings. For example, a contributor may describe internal discussions within a workplace, confidential business information, or other matters that they learned about through a professional position.

Some contributors may also be subject to non-disclosure agreements (NDAs) or other contractual confidentiality obligations. The existence of such agreements does not automatically prevent participation in a production, but it may create legal risks for both the contributor and Hearst Networks if confidential information is disclosed.

Content creators should therefore take care when contributors propose to share information that may be confidential. In particular, you should consider:

- i. Whether the information appears to have been shared in confidence;
- ii. Whether the contributor may be subject to contractual confidentiality obligations; and
- iii. Whether disclosure could expose the contributor or Hearst Networks to legal claims.

**Where confidentiality issues arise, the matter should be discussed with your Compliance contact at an early stage so that an assessment of the risks of disclosure can be conducted.**

#### 4.10.9. Privacy: Practical Points to Consider

Content creators must consult their Compliance contact at an early stage where:



- i. Filming involves private locations such as homes, ambulances, police stations or hospitals;
- ii. Sensitive personal information may be disclosed;
- iii. Covert filming or recording is being considered; or
- iv. Footage obtained from third parties raises privacy concerns.

Early discussion can help ensure that privacy issues are addressed appropriately and that the editorial justification for including the material is clearly documented.

Before including material that may raise privacy concerns, content creators should consider:

- i. Does the individual have a reasonable expectation of privacy in these circumstances?
- ii. Has consent been obtained where required?
- iii. Does the material reveal private information such as health details, home location or family matters?
- iv. Could including the material cause unnecessary distress or intrusion?
- v. Is there a clear editorial justification for including the information if consent has not been obtained?
- vi. Is the information protected by confidentiality?

**If in doubt, the issue should be discussed with your Compliance contact at the earliest opportunity.**

#### 4.11. Commercial References

It is crucial that audiences can trust the editorial independence of content that appears on Hearst Networks and are not misled about any commercial relationships behind the content. Editorial decisions must never be driven by advertisers, sponsors or commercial partners.

Content can sometimes include references to brands, commercial partnerships or audience competitions. These can be entirely legitimate, but they must be handled carefully to ensure that viewers are not misled and that editorial integrity is preserved.

If content will involve brand partners, advertiser funding, product placement or audience competitions, this should be discussed with your Compliance contact at an early stage so that the appropriate processes can be followed.

##### 4.11.1. Sponsorship, Product Placement and Brand References

Content made for Hearst Networks may sometimes involve commercial arrangements such as sponsorship, product placement or brand partnerships.

In practice, content creators should keep the following principles in mind:

- i. **Sponsorship:** A brand may sponsor an episode or series, but the sponsor must not influence the editorial content. The programme must remain editorially independent.
- ii. **Product placement:** In some cases, branded products or services may appear within content. Where this occurs as part of a commercial arrangement, it must comply with Ofcom rules and may require specific on-screen disclosures.
- iii. **Editorial references to brands:** References to brands that arise naturally in the course of filming (for example in documentary settings or real-world environments) are usually acceptable, provided they are editorially justified and not unduly prominent.

- iv. **Advertisements:** Ads must be clearly separated from editorial content so that it is clear to the viewer what is editorial and what is commercial content.

As a general rule, content should avoid giving excessive prominence to commercial brands or services, particularly where there is no editorial justification for doing so.

#### 4.11.2. Editorial Independence

Maintaining editorial independence is a core requirement of the Ofcom Code and a key expectation of Hearst Networks.

Advertisers, sponsors or commercial partners must not influence the editorial content of programmes. For example, they should not be given control over:

- i. Which topics are covered in content made for Hearst Networks;
- ii. Which contributors appear; or
- iii. How a story is presented or interpreted.

Where commercial partners are involved in a project, producers should ensure that the content remains editorially driven and defensible.

If a commercial partner attempts to influence editorial decisions, this should be raised with your Compliance contact.

#### 4.11.3. Broadcast Competitions and Voting

Some programmes may include competitions, prize draws or audience voting features. These must be conducted fairly and in a way that does not mislead viewers.

In practical terms, producers should ensure that:

- i. Competitions and votes are run fairly;
- ii. The rules are clearly written and accessible to viewers;
- iii. Prizes are accurately described; and
- iv. Viewers understand how to participate and what the conditions are.



Particular care should be taken where participation involves a cost to the viewer.

**If content includes competitions or audience voting, producers should discuss the format with their Compliance contact at an early stage so that the appropriate rules and disclosures can be put in place.**

#### 4.11.4. Hearst Networks Internal Guidance

Please refer to the following policies, which contain detailed guidance on the rules that apply to sponsored content, advertiser funded programming or product placement:

- i. Advertiser Funded Programming and Product Placement
- ii. Sponsorship Guidance

These documents explain the approval processes, compliance checks and on-screen disclosures that may be required.

**Where commercial arrangements are being discussed, producers should engage with your Compliance contact at an early stage.**

## **5. Genre Specific Guidance**

The guidance set out in this Handbook applies to all content produced for Hearst Networks, regardless of format or platform. However, some types of content raise particular legal or compliance considerations that content creators should think about early in the development process.

This section of the Handbook provides genre-specific guidance in order to highlight common issues that arise in certain types of content and to provide practical guidance on how the general compliance principles should be applied in those contexts.

This guidance does not replace the requirements of the Ofcom Broadcasting Code or the core principles set out elsewhere in this Handbook. Instead, it is intended to help content creators identify potential risks earlier in the production process and plan accordingly.

Where content falls within more than one genre, producers should consider the guidance in all relevant sections. If you are unsure whether a particular issue may raise compliance or legal concerns, you should discuss it with your Compliance contact at an early stage.

## 5.1. True Crime

True crime content can raise complex editorial, legal and ethical considerations. These may include issues relating to fairness, privacy, the treatment of victims and their families, and the risk of prejudicing criminal proceedings.

Content creators should ensure that the pursuit of a compelling narrative does not lead to misleading conclusions, unfair treatment of individuals, or unnecessary distress to those affected by the events being examined.

**Where a project involves serious allegations about identifiable individuals, unresolved criminal cases or the potential for legal proceedings, content creators should discuss the project with Hearst Networks Compliance at an early stage.**

### 5.1.1. Early Stage Assessment

Before undertaking significant development work, content creators should carry out an initial editorial and compliance assessment of the project.

This should include considering:

- i. Whether the content will revisit disputed or unresolved events;
- ii. Whether new allegations about responsibility will be made;
- iii. Whether key individuals connected to the events are still living and identifiable; and
- iv. Whether the case has previously been the subject of court rulings, official findings, settlements, apologies or earlier media coverage.

**Where these factors indicate heightened risk, the project should be discussed with your Compliance contact at an early stage.**

### 5.1.2. Key Editorial and Compliance Risks

True crime content frequently involves sensitive subject matters and allegations about real people. Content creators should take particular care when:

- i. Revisiting historic criminal cases;
- ii. Examining alleged miscarriages of justice;
- iii. Presenting new allegations or theories about criminal responsibility; and
- iv. Discussing individuals who may still be alive and identifiable.

In these situations, content creators should ensure that claims are supported by reliable evidence, that contributors are presented fairly, and that the content does not present speculation as established fact.

### 5.1.3. Contributors and Sources

True crime content often relies heavily on interviews with contributors such as investigators, journalists, experts, witnesses and family members.

Content creators should consider the motivation, expertise and reliability of contributors, particularly where they are making serious allegations or offering interpretations of events.

Content creators should also consider the underlying quality of the evidence on which the content relies. This may include asking who conducted the research, what primary material has been reviewed, whether independent expert scrutiny is needed, and whether any significant evidence or context has been omitted. Particular care is required where serious allegations are supported mainly by hearsay, recollection of historic events, or contributors with a personal, professional or campaigning interest in a particular outcome.

Where contributors are recounting events from a long time ago, it is important to recognise that memory may be imperfect. Claims should be carefully tested against available evidence and other sources wherever possible.

Where a contributor has a personal stake in the story (for example, a family member of the victim or someone otherwise involved) this context should be made clear in the editorial framing of the content.

Payments should not be made to people who have confessed to or been convicted of a crime in return for contributions relating to that crime, unless there is a clear public interest justification. Any payments must be discussed and approved by your Compliance contact in advance.

Where contributors take part in sensitive true crime content, content creators should ensure that consent is properly informed and documented, and should take particular care if the scope or editorial direction of the content changes in a way that could materially affect the contributor's original understanding of their participation.

#### 5.1.4. Victims, Families and Those Affected by Crime

Producers should take particular care when content involves victims of crime, surviving relatives or others directly affected by traumatic events.

Content should avoid sensationalising or glamorising criminal behaviour, and should be mindful of the potential impact that revisiting traumatic events may have on victims and their families.

So far as is reasonably practicable, producers should inform surviving victims or the immediate family of the deceased that content examining the events is in production. They should be notified of the purpose of the content and details of its release. This can help reduce the risk of unexpected distress when the content is released. Notification must always happen at an appropriate point before the content is publicly marketed.

While best efforts should be made to contact victims or their relatives, you should avoid directly contacting any vulnerable contacts (for example, children or people who lack capacity). **The Compliance Team should be notified and consulted prior to any notifications being sent to victims or families of victims.**

Care should also be taken when including graphic details or sensitive material relating to crimes. Content creators should assess whether this information is necessary and proportionate in the editorial context, and whether its inclusion may cause unnecessary distress to victims, their families or others affected by the events. Where such material is included, you must consider whether warnings or other mitigating measures may be appropriate.

#### 5.1.5. Privacy and Anonymity

True crime content may involve individuals who have a legal right to anonymity or who may reasonably expect privacy.

For example, there are statutory protections for the anonymity of alleged victims of sexual offences, and additional protections may apply to children or vulnerable individuals.

Content creators should ensure that content does not inadvertently reveal the identity of individuals who are legally protected or whose privacy could be infringed through “jigsaw identification” (where separate pieces of information combine to reveal an identity).

#### 5.1.6. Accuracy, Evidence and Viewer Trust

True crime content often seeks to explain complex events or contested accounts of what happened in relation to a crime. In doing so, content creators should take care to ensure that:

- i. The content is grounded in reliable evidence;
- ii. Speculation or theory is clearly distinguished from established fact;
- iii. Key facts are not omitted in a way that could mislead viewers; and

- iv. They do not fix the narrative around a preferred suspect, theory or interpretation where the available evidence does not support that conclusion, or where significant contrary material has been left out without clear editorial justification.

Where content advances a particular interpretation of events (for example, suggesting that a miscarriage of justice may have occurred), it is particularly important that the evidential basis for that interpretation is robust and fairly presented.

Where content makes serious allegations about living people or existing organisations, a right of reply should be sought once the substance of the allegations has been properly researched and settled, and in sufficient time to allow for a fair opportunity for response.

When offering a right of reply, content creators should ensure that the individual or organisation is given sufficient information to understand the nature of the allegations and the context in which they may appear.

In practice, a right of reply request should normally:

- i. Clearly explain the nature of the content and the context in which the individual or organisation will be referred to;
- ii. Set out the specific allegations or issues that relate to the individual and organisation;
- iii. Indicate the form of response sought (for example, an interview or written statement);
- iv. Provide sufficient background information to allow the subject to understand the substance of the concerns being raised;
- v. Provide a reasonable deadline for response, taking into account the seriousness of the allegations and production timetable; and
- vi. Contact details for a designated contact in the production company.

What constitutes a reasonable timeframe for a response will depend on the seriousness of the allegations and the circumstances in which the right of request is made, including how quickly a response could reasonably be expected.

Content creators should ensure that requests for comment are made at an appropriate stage in the editorial process. Approaching someone too early may lead to confusion about the scope of the allegations, while leaving the request too late may not provide a fair opportunity to respond.

Where an individual or organisation declines to participate or does not respond, this should normally be reflected fairly in the content.

#### 5.1.7. Reconstructions and Dramatisations

Reconstruction and dramatisations are regularly used in true crime content. These can help audiences understand complex events, but they must be used carefully to ensure that viewers are not misled.

Reconstructions should not give the impression that they represent definitive accounts of events where the facts are uncertain or disputed. Where appropriate, reconstructions should be clearly signposted so that audiences understand their purpose.

Any use of AI-generated material in reconstructions must comply with the standards set out in the AI Use Content Guidelines. AI-generated reconstructions must not be misleading, falsify history or manipulate the truth. **Content creators should consult with their Compliance contact to ensure that any AI-generated material is used appropriately.**

#### 5.1.8. Criminal Law Risks

True crime content may also raise specific legal risks. These may include:

- i. Where proceedings referenced in the content are 'active', there may be a risk of contempt of court if material risks prejudicing a trial;
- ii. Restrictions imposed on reporting certain court proceedings. Material obtained from criminal or civil proceedings, including transcripts, interview

records and disclosed documents, may be subject to separate legal restrictions that limit reuse or republication;

- iii. Where content makes allegations of wrongdoing, incompetence or criminality about identifiable living people or organisations, there may be defamation risk. Content creators should consider whether those allegations are supported by sufficiently robust evidence and whether a fair and timely opportunity to respond has been provided;
- iv. Protections relating to anonymity, including the fact that alleged victims of sexual crimes benefit from automatic anonymity and must not be identified without their express consent; and
- v. Protections relating to children involved in legal proceedings.

**Where content refers to active cases or events involving identifiable individuals, particularly where victims are still living, content creators should seek guidance from their Compliance contact and obtain legal advice where required.**

#### 5.1.9. Post-Release

The release of true crime content can sometimes generate renewed public interest in historic cases or allegations.

Content creators should consider the potential impact that publication may have on individuals connected to the events being covered, including victims, families and those previously accused or convicted.

Where appropriate, content creators should ensure that relevant contributors or affected parties are aware of the planned release of the content. Care should also be taken with trailers, publicity materials, clips and social media promotion, which must not create a misleading or defamatory impression that goes further than the content itself. Particular attention should be paid to the risk of jigsaw identification where individuals are anonymised within the content.



For podcast content, please refer to the Hearst Networks Compliance Guide for True Crime Podcasts.

## 5.2. Blue Light Programming

Content that follows the work of emergency services, including police, ambulance, fire and rescue services, can provide the audience with important insight into frontline public services. However, filming in these environments often involves high-stress situations, vulnerable individuals and sensitive locations, and therefore requires careful judgement.

Content creators should take particular care to ensure that the presence of cameras does not interfere with operational duties, and that individuals who appear in the content are treated fairly and with appropriate respect for their privacy and dignity.

Where content involves emergency services, producers should ensure that appropriate access agreements and filming protocols are in place and should discuss any potential risks with your Compliance contact at an early stage.

### 5.2.1. Filming with Emergency Services

Recording with emergency services will often take place in high-stress, unpredictable environments. Content creators should ensure that all arrangements are agreed in advance with the relevant organisation and that the production team understands any operational constraints.

It is important that recording does not obstruct or delay emergency personnel, and that editorial decisions do not compromise the safety or effectiveness of emergency responses.

### 5.2.2. Vulnerable Contributors

Those who seek help from emergency services may be experiencing medical emergencies, distress, trauma or other vulnerable circumstances. Recordings of people in these situations should not be used where it would infringe on their privacy, unless you have their consent or there is a clear legal justification.

Content creators should consider carefully whether it is appropriate to include such individuals in the content and should ensure that participation is handled sensitively. Particular care should be taken when individuals may not be in a position to provide fully informed consent at the time of filming (for example, if they are in shock or have suffered a severe injury).

Where appropriate, consent should be revisited once the individual is no longer in an emergency situation and is able to consider their participation more fully.

### 5.2.3. Privacy and Consent in Sensitive Situations

Blue light content frequently involves filming in homes, medical settings or other locations where individuals may have a strong expectation of privacy.

Content creators should ensure that appropriate consent is obtained before including identifiable individuals in the content, unless there is a clear editorial justification for doing otherwise. Special care should be taken when filming in hospitals, ambulances, police custody environments or homes, where privacy expectations may be particularly high.

People experiencing distress should not be put under any pressure to be recorded or to consent. Where individuals are not able or willing to consent to inclusion in the content, producers should give careful consideration to whether it is necessary to anonymise the individual or to otherwise edit the content to minimise their participation.

If you are recording people who are suspected of a crime, this may raise privacy concerns, particularly if the person is not convicted. In these circumstances, producers must seek legal advice at an early stage.

#### 5.2.4. Sensitive Material

Material captured during emergency responses may include distressing scenes, medical treatment, or the aftermath of serious incidents.

Content creators should assess carefully whether the inclusion of such material is editorially justified and proportionate and should consider the potential impact on those affected by the events depicted.

Where individuals have suffered trauma, content creators should take reasonable steps to minimise the risk that the content will cause unnecessary distress to those involved or their families.

**Content showing people dying or at the point of death is only permissible in exceptional circumstances and must be justified with reference to the public interest and cleared with your Compliance contact.**

#### 5.2.5. Bodycam Footage and Emergency Call Audio

Blue light content may incorporate material such as body-worn camera footage, dashcam footage or emergency call recordings.

Where such material is used, content creators should ensure that it is included in a way that respects the privacy and dignity of those involved, and that any necessary permissions have been obtained from the relevant organisations.

Care should also be taken to ensure that such material is not presented in a misleading way through editing or lack of context.

#### 5.2.6. Editorial Control



Although productions may work closely with emergency services organisations, editorial control of the content for Hearst Networks must remain independent.

Emergency services partners should not be given control over the editorial framing of the content, and content creators should ensure that the final content remains balanced, accurate and editorially justified.

### 5.3. Investigative Content

While Hearst Networks does not routinely commission content that relies on investigative journalism techniques, elements of investigation may sometimes arise in documentary, factual or podcast content. This is particularly the case where content examines allegations of wrongdoing or seeks to expose matters of public interest.

This section provides general guidance for situations where investigative approaches or techniques may be considered. **Where a project proposes to use methods such as covert filming or recording, deception or other intrusive techniques, the proposal must be discussed with your Compliance contact at an early stage.**

#### 5.3.1. Public Interest Justification

Many investigative techniques that would raise compliance concerns (such as covert filming, deception or intrusive reporting) may only be justified where there is a clear public interest.

Public interest may include exposing crime, corruption, serious wrongdoing, threats to public safety or significant failures by institutions or organisations.

The fact that a story may attract public curiosity or attention does not in itself mean it is in the public interest. Producers should therefore be able to explain clearly why the investigation is warranted and why the chosen methods are necessary. **This should be clearly documented at the outset of the project and discussed with your Compliance contact.**

### 5.3.2. Transparency and Editorial Accountability

Investigative content often relies on complex editorial decisions about sources, evidence and allegations. Content creators should ensure that claims made within their content are supported by reliable evidence and have been appropriately verified.

Where serious allegations are made about identifiable individuals or organisations, those concerned should normally be given a fair opportunity to respond before publication.

Content creators should also ensure that audiences are not misled about the nature of the evidence presented, and that speculation, opinion and verified facts are clearly identified as such.

### 5.3.3. Covert and Intrusive Techniques

Investigative reporting may sometimes involve techniques such as covert filming, surreptitious recording, deception or doorstepping. These methods can raise significant privacy and fairness issues and should only be used where there is a clear editorial justification and they have been approved in advance by Hearst Networks Compliance.

As a general principle, intrusive techniques should only be considered where:

- i. There is credible evidence suggesting wrongdoing;
- ii. The material sought cannot reasonably be obtained through open or less intrusive methods; and
- iii. The approach is proportionate to the seriousness of the issue being investigated.

**Content creators must discuss any proposal to use covert filming, surreptitious recording or deception with their Compliance contact.**

#### 5.3.4. Approval and Escalation

Because investigative techniques can carry heightened legal risk, content creators should ensure that potential issues are identified and escalated early in the production process.

In particular, the following situations should be referred to Hearst Networks Compliance:

- i. Investigations involving serious allegations about identifiable individuals or organisations;
- ii. The use of covert filming or recording techniques;
- iii. Proposals to use misrepresentation or deception to obtain information; and
- iv. Potential risks relating to defamation, privacy or contempt of court.

Early engagement with Compliance can help ensure that investigations are conducted in a way that is robust, fair and legally defensible.

## **5.4. Reality Television**

Reality and factual entertainment content can provide entertaining insights into the lives, relationships and experiences of others. However, this genre often involves extended filming with contributors in personal or emotionally charged situations, which can raise a number of duty of care considerations.

Content creators should ensure that contributors are treated fairly, respectfully and with appropriate care for their welfare throughout the production process. This includes considering the potential impact of participation both during filming and after release.

Reality content should be produced in a way that maintains editorial integrity and transparency, ensuring that contributors and audiences are not misled about the nature of the content or the circumstances in which events occur.

### **5.4.1. Scope of Reality and Factual Entertainment**

For the purposes of this guidance, reality content includes content that follows contributors over time or places them in structured environments or situations where their behaviour and interactions form the basis of the content.

Examples include observational reality formats, structured factual entertainment and lifestyle formats in which real people participate.

Because contributors often appear as themselves rather than as performers, producers should take particular care to ensure that participants fully understand the nature of the content and the potential reach of the final production.

### **5.4.2. Duty of Care**

Reality productions can involve extended filming schedules, close observation of contributors' personal lives, and situations that may become emotionally intense.

Producers should therefore take steps to ensure that appropriate duty of care measures are in place before, during and after recording. This may include:

- i. Ensuring contributors have a clear understanding of what participation involves;
- ii. Providing appropriate support where filming involves sensitive or emotionally challenging situations; and
- iii. Considering the potential impact of broadcast and online discussion following release.

Further guidance on duty of care expectations is set out in section 4.9.8 above.

#### 5.4.3. Privacy and Consent

Reality content frequently involves filming in homes or other personal or private environments, which can raise privacy considerations.

Content creators should ensure that contributors provide informed consent for participation and that they understand how footage may be used in the final content. Where individuals who are not participants appear in the content, consider whether their consent is required or whether identifying details should be removed.

Care should also be taken where contributors discuss private information about third parties, particularly where they might be identifiable.

When filming with children, care should be taken to minimise the amount of personal information included, limiting it to what is strictly necessary. For example, to protect their privacy, it may be appropriate to refer to a child only by their first name and avoid disclosing specific details about their location.

#### 5.4.4. Editorial Integrity

Reality formats may involve structured scenarios or editorial techniques designed to help tell a story. However, content creators should ensure that these techniques do not materially mislead contributors or audiences about what has happened.

Events should not be staged or manipulated in a way that creates a materially misleading impression of reality. Contributors should also not be encouraged to behave in ways that could cause unnecessary distress, reputational harm or unfair portrayal.

Where editorial interventions are used (for example, to organise filming or prompt discussion), content creators should ensure that these remain transparent and proportionate within the editorial context.

#### 5.4.5. Impact of Social Media

Contributors appearing in reality and factual entertainment content may experience increased attention on social media following the release of content, which can include both positive engagement and negative commentary.

Content creators should consider the potential impact of online discussion on contributors and should ensure that participants are made aware of the Hearst Networks Social Media Guidelines for Contributors. These guidelines provide practical advice on managing social media activity, protecting personal information and dealing with online criticism or abuse.

Where appropriate, contributors should be encouraged to review these guidelines before broadcast and ensure that they know who to contact within the production team if they experience online harassment or require support.

#### 5.4.6. Additional Guidance

Those working on reality content should also consult relevant sections of this Handbook relating to:

- i. Safeguarding and vulnerable contributors (section 4.2)
- ii. Fairness, Consent and Duty of Care (section 4.9) ; and
- iii. Privacy and confidential information (section 4.10)

**Where a project raises significant duty of care, safeguarding or privacy concerns, content creators should discuss these with their Compliance contact at an early stage and seek legal advice as required.**



## **6. When to Seek Further Advice**

These Guidelines are intended to support content creators in creating engaging, and entertaining content for Hearst Networks in a responsible manner. Not every situation that arises during production will be addressed in this Handbook. Editorial judgement will always play an important role, and content creators are encouraged to seek advice wherever uncertainty arises.

Production may be asked by Compliance to draft filming protocols to plan how they will approach filming for a particular type of content or an aspect of filming.

If you have questions about how these Guidelines apply to a particular project or editorial decision, you should engage with your Compliance contact at an early stage. Early discussion can often help identify and resolve potential issues before they become more complex.

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## **Hearst Networks' Preferred Partners**

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