

## INTRODUCTION

Editorial and journalistic integrity is integral to our ability to achieve our public media mission. Adherence to these foundational values in our work underpins our ability to connect to local and national audiences with credibility. Below are the guidelines for our editorial work.

## APPLICATION OF THESE GUIDELINES

1. These guidelines represent a distillation of the most important standards and practices that have helped journalists and nonfiction producers in the past. They are not meant to be comprehensive, and producers are encouraged to seek the advice or guidance of the Executive Producer or management supervisor when in doubt. While all GBH employees are subject to the GBH Code of Ethics/Conduct Policy, these guidelines apply specifically to all journalists, producers, editors, photographers, cinematographers, researchers, talent and senior management involved in the creation of editorial content – such as nonfiction documentaries and news – across GBH’s many platforms. The guidelines do not apply to “lifestyle” programs, which have established their own patterns and practices. Others at GBH who have editorial-related jobs, whose work touches our journalism and programming or who have contact with the public, should understand that these principles generally apply to them as well. These guidelines may be modified from time to time, and comments are always welcome.

2. GBH recognizes that many of these guidelines will appear quite familiar, and many are based simply on common sense. Still, we believe it is important to make this document a part of the ongoing relationship with producers. We draw your attention to the requirement that producers always strive to protect the editorial integrity of the content they are making and that they follow the highest ethical conduct in its production. Of course, no set of rules or standards can ensure the result by itself. These guidelines are for the most part self-enforcing, but a good faith effort to abide by them is expected, and their willful violation could result in the termination of your relationship with GBH.

3. These guidelines apply equally to those on staff and to those with whom we contract to make a program. This policy applies only when a person is working for a GBH production. However, any activities of a contractor, freelancer or external producer that may be perceived as violations of this policy – whether through physical actions or words, or written comments online or on social media – could impact a future relationship with GBH.

4. Where the term “producer” is used we mean also to include reporters or other staff persons with day-to-day editorial responsibility for a program, program segment or other editorial content. Where the term “Executive Producer” is used we mean to include, where appropriate, any “Editor in Chief” or senior producer or editorial project supervisor. Where the term “program” is used we mean all editorial content regardless of platform (to include documentaries, news segments, television, digital video, social media posts, radio and written content).

#### FAIRNESS

5. All of GBH’s nonfiction programs rest on the expectation that the producers we hire and contract with are interested in honest inquiry into the matter at hand and will approach the making of programs with open minds. Since publication of truthful, accurate information is the prime mission of our nonfiction national programs and news programs, it should be clear that willful misrepresentation or falsification of program content will be considered unprofessional conduct and will carry the most severe consequences.

6. In the pursuit of truthful information, the producer must be sensitive to issues of fairness if the program is to have credibility. We ask for the viewer’s trust. In turn, we promise that the subject matter and the people in the program will be treated fairly.

7. Appearance of intent to be fair is a strength. If the intent is seen to be fair, whatever message the program carries is reinforced. When a program seems to the viewer or listener to be unfair, it defeats itself.

8. Specifically, fairness means that producers will:

- approach stories with an open, skeptical mind and a determination, through extensive research, to acquaint themselves with a wide range of viewpoints;
- try to keep personal bias and opinion from influencing their pursuit of a story;
- seek and carefully examine contrary information and views;
- exercise care in checking the accuracy and credibility of all information they receive, especially as it may relate to accusations of wrongdoing;
- give individuals or entities who are the subject of attack the opportunity to respond to those attacks;
- represent fairly the words and actions of the people portrayed, and when appropriate seek and reflect their viewpoints even if they have not agreed to be interviewed;
- inform interview subjects, when appropriate, of the general areas of investigation and questioning in advance and, if important for accuracy, give those individuals an opportunity to check their records;

- try to present the significant facts a viewer would need to understand what he or she is seeing, including appropriate information to frame the program;
- always be prepared to assist in correcting errors.

9. When there are conflicting viewpoints or opinions on subjects treated within a journalistic program, fairness does not require that equal time be accorded to conflicting opinions. However, it does require the acknowledgment and responsible statement of those conflicting opinions.

10. In matters of fairness there is one specific requirement: All producers must have a fact-checking procedure at the completion of the program. In the case of long-form content, for instance, this would mean that every line of narration and synch and every picture is checked for the accuracy of any factual assertion. Pay attention to the proper spelling of names and titles, correct dates, accurate translation of foreign language material, etc. Producers should be prepared to show and cite their sourcing or sources in a fact-checking document or annotated script. Producers should generally review assertions of fact given by experts, especially if any credible questions arise about their accuracy. If an expert's assertion calls into question the character or competency of another person or entity or is otherwise possibly defamatory, then the assertion may not be accepted without verification. All factual assertions by nonexpert interviewees should also be checked.

11. Nothing in the fairness rules should be interpreted as preventing a producer from making a point-of-view or authored program. However, such a program must be identified and labeled as such. Then these programs can be given more latitude as personal and artistic expressions, so long as they are not inaccurate or defamatory.

## FUNDING A PROGRAM

12. Best practice dictates that producers should be distanced from potential funders to the greatest extent possible (does not apply to co-producers, see 16 below). The presentation of proposals should be the job of the Executive Producer and/or the development office and/or senior management. However, input from producers for proposal purposes may be desirable, or a producer may be asked to research and write a development document. Once a project is funded, producers should try and avoid contact with funders except for promotional purposes. Sometimes, however, projects come to GBH after independent producers have already had discussions with funders. In those cases the producer is obligated to disclose to the Executive Producer the nature of those conversations and to keep the Executive Producer informed of any future ones. It is incumbent upon the unit Executive Producer to keep the VP of

National Programs, or the Editor in Chief of GBH News or other relevant senior GBH management, informed of any fundraising initiatives.

13. The editorial integrity of a program demands that the funder not become a part of the editorial process. If it becomes necessary for a producer to interact with a funder at any point in time, it is appropriate to discuss the importance of the issue, the amount of research done, possible approaches to stories, and a producer's qualifications to make the content.

14. It is inappropriate to promise to include or exclude particular information or characters; it is inappropriate to promise to give more or less weight to any particular aspect of a program; and it is inappropriate to commit to a particular film or program architecture.

15. Producers should disclose to the Executive Producer any possible interest or connection between a funder and an interview subject or material in the program, and be prepared to be transparent about this relationship if deemed appropriate by the Executive Producer and/or other GBH senior management.

16. Remember that these guidelines apply to funders and not to co-producers. Co-producers are other entities that may bring money, access to money, editorial input, personnel or other resources to a project. Whatever the co-producer brings should be compatible with GBH and have its own independent perspective towards the subject matter of the program. All co-production agreements must be approved by GBH.

17. If a producer has obtained partial funding for a program, he/she must disclose these sources as soon as possible so that the Executive Producer can determine if any of the sources pose problems under GBH and PBS funding guidelines.

## RESEARCH AND FILMING

18. As a producer considers various techniques in researching a story, persuading sources to participate and gathering information, we expect her/him to act in an honorable fashion. (See also 28-30.) Although specific examples could not cover all the concerns, the primary issue is one of personal integrity. A general question a producer might ask her/himself might be: "If you had to tell the public how you got the story, how would it sound?"

## Consult on Conflict of Interest Problems

19. Any producer who has a material interest – financial, family, political or other personal stake – in a subject to be covered in her/his program must make that interest known to the Executive Producer. It is also the producer's responsibility to monitor any interests of those he or she may hire to carry out the project. Also note that if the subject of the program involves GBH, or an organization in which it has an interest (e.g., PRX/PRI, WGBY, WCAI, WCRB, PBSd), the producer must disclose any institutional conflict of interest to the audience.

20. Where the matter under examination may place the producer or other members of her or his team in possession of information that could lead to personal gain, especially in the case of "insider" knowledge of a publicly traded company, acting on that knowledge might be considered illegal and must be avoided.

## Do Not Lobby or Endorse Candidates

21. GBH staff producers engaged in creating content are bound by a rigorous prohibition against certain political activities. The specifics are outlined in the GBH Code of Ethics/Conduct Policy. Although the policy cannot apply in all its details to independent producers, the principles underlying that policy will be applied during the period of time the independent producer is working by contract for GBH. Those principles are:

- GBH programs cannot endorse particular political candidates, parties or ballot issues. Coverage of legislation and elections is perfectly appropriate. "Equal time" requirements during election cycles may be applicable.
- When working on any politically controversial programs, the producer should engage in no personal political activities, including donations or signing petitions, that would undermine her/his claim to be a trusted reporter, producer or editor. Any prior donations must be disclosed to the Executive Producer. The general test here is whether a producer or the Executive Producer would feel uncomfortable if private beliefs or actions were made public in the context of one's work for GBH.
- When working on any program for GBH, producers should not lobby for or against any specific piece of legislation, and must never use their relationship with GBH to promote or oppose specific pieces of legislation.

## Do Not Accept Gifts

22. As a general rule, the producer should pay her or his own way and be beholden to no one. Producers should avoid honoraria or gifts from groups that have an interest in how

the subject of the program is treated. For GBH staff members, more detailed rules regarding conflicts of interest, gifts and outside work can be found in the GBH Code of Ethics/Conduct Policy. However, to reduce production budgets, producers may negotiate deals for free or reduced airline, hotel, car rental and other services in exchange for a "special thanks" credit. If it would appear that the entity providing the service has an interest in the subject matter of the program, the practice should be avoided.

### Do Not Plagiarize

23. In the writing of program proposals, outlines and treatments, it is appropriate to rely on what has been published by others as long as proper citation is given. But if, before making the program, a producer anticipates substantial reliance on the work of others, it is customary to offer credit to them or to credit their work. It may also be equitable to pay the original author as a consultant to the project. Since these matters turn on many variables, a general guideline is not possible except that it is important that producers disclose, as soon as possible, any circumstances they are aware of in which third parties could raise claims of plagiarism. All arrangements with parties who have previously published material relied on or used in the program must be approved or reviewed by the Executive Producer.

### Obey the Law

24. The obligations of producers are generally not different from those of a citizen when it comes to obeying the law. It is particularly important that the producer not violate the rights of others in the pursuit of a story. Producers, themselves, should never take action that would facilitate or encourage the commission of a crime.

25. Knowledge that a crime may occur which might endanger a person or the property of others should be discussed with the Executive Producer, but if there is imminent danger of serious harm, it should be reported promptly to the appropriate public officials.

26. Certain investigative techniques permit knowledge of a crime to be withheld from authorities (e.g., when the producer is investigating the misconduct of a public official who would have knowledge of it if such a report were made). Also there are a few very rare special cases (e.g., the practice of demonstrating lax law enforcement by violating the law) in which such violation of law might be journalistically permissible. The Executive Producer must approve any such case in advance. Any case in which the producer feels he or she may be in violation of law should be brought to the attention of

the Executive Producer and the GBH Legal Department. Additionally, when appropriate, the VP for National Programs, Editor in Chief of GBH News or other relevant senior GBH management should be made aware of the situation.

#### Consult Before Employing Hidden Cameras or Listening Devices

27. Depending on the circumstances, electronic listening and the use of hidden cameras and recording devices are illegal in a number of jurisdictions, and therefore should not be undertaken without the Executive Producer's approval and consultation with the GBH Legal Department, as well as the VP for National Programs and/or Editor in Chief of GBH News or other relevant GBH senior management when appropriate. This guideline does not apply to situations in which a telephone conversation is recorded with the consent of both parties (one is sufficient in some jurisdictions) for purposes of accuracy. Producers should be aware that the broadcast of a telephone conversation that was recorded without the consent of all parties may violate FCC regulations.

#### Avoid Misrepresentation

28. In general, a person whose participation or cooperation in a documentary or news production is sought should know the identity of the producers and why the producer is seeking the person's involvement.

29. Material gathered under false pretenses may not carry the same implication of consent that otherwise applies to information freely given to a journalist. If a case arises that calls for a producer to hide her/his identity, it must be approved by the Executive Producer in advance of shooting unless producing under dangerous conditions does not permit.

30. In some cases it may be necessary for a producer to withhold her/his identity. Such cases are still exceptional and should be discussed in advance with the Executive Producer unless producing under dangerous conditions does not permit.

#### Seek Unrestricted Access and Use—Identify All Restrictions or Conditions on Access or Information and Materials

31. It is preferable in public affairs/news reportage for access to a place or to a subject to be granted without any restriction or condition. Any question may be asked, none is rehearsed or identified beforehand, and no limit or condition is placed upon the uses made of the answers or materials given. It is reasonable in exchange for such unrestricted use to explain the purpose of the inquiry and even, to the extent known, the

general context in which the particular interviewee will appear. In special circumstances it may be desirable to provide questions ahead of time. For example, fairness may require that the subject of an investigative interview have the opportunity to check her or his records. Also it may be desirable and appropriate to prepare the interviewee ahead of time in non-public affairs documentaries in which the aim is to elicit specific information. In no case, however, should a producer suggest to a participant that he/she would have the right to edit any material obtained by the producer.

32. With historical content it is an accepted practice to give people an opportunity ahead of time to organize their notes and thoughts. It is the producer's responsibility to discern between refreshing memory and recreating the past. Simply put, the basic responsibility is not only to avoid manipulating an interview subject but also to avoid subjects manipulating the producing and the content.

33. In some circumstances it may be necessary to agree to further conditions or restrictions to gain access, although agreement to such conditions should be the rare exception. Before conditions or restrictions on use are made a part of the contract for access, consult with the Executive Producer. In the rare case of a government agency conditioning access by a demand for review for national security purposes (e.g., the release of classified material, protecting the security of troops), the producer must discuss this situation with the Executive Producer to determine GBH's willingness to comply. In almost all cases, conditions and restrictions should be disclosed in the program.

#### Do Not Pay for Testimony

34. It is GBH's policy not to pay for interviews, nor to pay guests in panel, debate or talk programs. Not only does it establish a bad precedent, but also the credibility of any interviewee who was paid is rightly called into question.

35. Reimbursement of expenses incurred by interviewees, panelists and guests as a result of recording (reasonable hotel bills, travel, etc.) is permissible. Producers need not consult for such payments. Under certain circumstances and with approval, payment for materials critical to the broadcast (photos, diaries, letters), as well as licensing the use of such materials, may also be made without violating this rule. However, no payment or other consideration may be made to induce a person to illegally obtain any such materials.



36. Payment to interviewees for work lost during filming may be allowed in cases of genuine hardship and in certain exceptional cases, if approved in advance by the Executive Producer.

37. A consultant/expert may be paid to appear in a program but should normally be identified as a consultant at the time he/she appears in most public affairs/news programs. In non-public affairs programs, whatever other credits a consultant/expert receives, he/she must be identified as a consultant/expert somewhere in the program or in the credits. A consultant/expert must be treated as any other subject in a film (see 48). A consultant/expert must perform other work for the project in addition to her/his appearance.

#### Consult Before Staging or Re-Creating Events

38. The use of re-creation and dramatized elements in public affairs programs can be effective devices, but there should be recognition of the fact that viewers might be confused by the presentation of something as real that is unreal. Therefore, whenever reenactments or staging are used, they must be clearly and unmistakably labeled as such or otherwise signaled in a clear way, if there is a significant chance that the viewer will be confused. Public affairs programs in particular need to use these devices with great care.

39. Historical programs and other non-public affairs programs may find it necessary to use dramatic recreations more often than in the case for public affairs programs. Often actors and sets will be employed. The responsibility here is to create an accurate vision of the past, whether for an entire program or for smaller scenes within a program. Producers must discuss with the Executive Producer the extent and style of recreations, how much information may be conveyed by the dramatization, whether dialogue may be used and what sources it may be drawn from. In instances where dialogue is created, academic experts must be consulted.

#### EDITING AND POST PRODUCTION

##### Edit to Compress, Not Distort

40. The ability to distort reality is ever increasing, and in no area of documentary and news production (and other edited programs) is there greater reliance on the honesty of the individual producer than in editing.

41. It should be the objective of the editing process to collect and order all significant facts in a manner that fairly portrays the reality. Whether or not this objective has been achieved cannot be known simply from looking at the result. Thus, a producer might ask herself/himself: "Would I be able to defend a particular cut if others had access to the original materials?"

#### Use Music/Effects with Care

42. The use of music and/or effects in long-form documentary programs as well as in digital/social media assets is an accepted practice. In public affairs programs, however, music that editorializes or over dramatizes can detract from the film's credibility. Effects and/or music in those programs should not be used if the impression created for the viewer would be distorted or inaccurate.

43. In public affairs programs, music/effects should be appropriate to and in keeping with the narrative line, and while this area is extremely subjective, the producer should guard against the temptation to use music/effects to communicate something that is not supported in the script.

44. In non-public affairs programs, music and effects may be used more loosely for dramatic effect and to entertain.

45. In general, the use of music or added effects in news segments is unacceptable. Some feature stories, commentary or essay-type programs may be exceptions to this rule. When uncertain, consult the Executive Producer or senior editorial manager.

#### Consult on Use of Indecent or Objectionable Materials

46. In general, language and materials offensive to general taste or manners (e.g., extreme violence, racial and other group epithets, strong language, nudity and sexually explicit material) should be avoided where inclusion is not necessary to an understanding of the matter at hand.

47. When it is judged that the exclusion of such material would have the effect of significantly distorting an important reality, the Executive Producer must approve its inclusion, and the program must carry appropriate warnings to the viewer or listener. In the case of national television or streamed programs and those of national radio programs or podcasts, PBS and NPR, respectively, must be notified in a timely fashion if warnings will appear before or during the program. In the case of local radio or TV programs, the Editor in Chief of GBH News must be informed.

## Identify Sources

48. One cardinal responsibility of the producer is to present the significant facts. That means clearly identifying those who speak on camera or who are invoked as an authority for a statement of fact.

49. Identity in this case must also include relevant information about the character of the source. By extension, any special interest the speaker or interviewee might have that could motivate her or his speaking should be made known in the program. For example, by narration or on-screen identification, one should note if the speaker has filed a lawsuit in the matter being discussed or works for an entity that has a political reputation or has written about science or history from a particular point of view.

50. Best practice dictates that there must be at least two independent sources on the record (one might be a document) before publishing controversial factual assertions. If that is not possible, publication may still be appropriate if the limitation on the ability to verify beyond the single source is clearly revealed to the viewer. The Executive Producer must approve any such exception.

51. From time to time, particularly in public affairs programs, it may be necessary to conceal or keep confidential a source's name or disguise a source's voice or appearance. In such cases, the name and background information about the source must be disclosed to the Executive Producer, and if appropriate the GBH Legal Department.

## Consider Range of Sources

52. Producers should use their editorial judgment in selecting the most informed and effective interviewees and characters to help tell the story and present information. An essential factor in this process is considering a broad range of sources with differing views, backgrounds and experiences. This ultimately helps producers tell the most accurate, fair and representative stories. Producers are free to exercise their editorial judgment as to which characters are best suited to push forward a story line, and which sources are best able to present the information the program seeks to deliver. However, we encourage producers to consider diversity in race, ethnicity, gender, sexual orientation, geographic and economic status as a positive value in choosing whom to present.

## Use Labels, Warnings and Disclosures

53. Producers are encouraged to suggest the use of labels, warnings and disclosures to ensure that viewers and listeners understand what they are about to see or hear. These devices can put viewers and listeners on notice about strong material that they may wish to avoid; the devices can properly set up the context for a whole program (e.g., point-of-view film); and they can be useful in presenting critical information a viewer needs to make a judgment about what he/she is seeing or hearing. The devices should be explicit enough in the script (audio or TV/stream/social), on screen or both so that the information can easily be absorbed.

## Attribute All Non-Original Materials When Necessary

54. Normally materials used within a program – including stock footage, home movies, stills, audio recordings, etc. – but not actually produced by the producer of the program do not have to be labeled or attributed to a source. However, if knowing the source of the material and/or its date would help a viewer better understand the communication, attribution should be made at the time the material is seen.

## Do Not Alter Still Photos

55. Photos used in public affairs or news programs should not be altered. Altering involves adding, subtracting or rearranging the elements in a photo and should not be done without disclosure to the viewer. Public affairs programs must be especially careful to do nothing that would jeopardize the credibility of the program. Producers should be able to defend their techniques in public.

56. However, some techniques commonly used with stills are not considered alterations. These include: camera moves, cropping, highlighting a portion of a photo, computer layering, etc. (discuss others with the Executive Producer if in doubt). These are considered directing techniques for editorial clarification and emphasis.

57. In non-public affairs programs, there may be some exceptions to the do-not-alter rule, but photos must never be altered to present an image that is not supported by the facts, and any alterations should be done only with the approval of the Executive Producer.

## Use Computer-Generated Imaging (CGI) with Care

58. The power of the computer to alter and create images offers many opportunities to enhance all forms of communication. In the nonfiction world, however, there is a danger that the computer can be used to create images and graphic effects that cross the boundary between creative license and misrepresentation. Misrepresentation can occur when images are presented as real when, in fact, they are artificial. If a viewer could reasonably believe the images created by computer-generated imaging (CGI) are real, then the technique should be avoided.

59. An exception to the above rule exists in certain historical and science programs in which CGI may be used to recreate scenes or locations that do not exist today or that cannot be seen because of circumstances. The Executive Producer must approve the use of such material. Disclosure to the viewer is recommended. Factual assertion in CGI sequences requires annotation in the script, as would any narrated fact.

## Do Not Pre-Screen for Interested Parties

60. Pre-screenings/airings for reviewers and showing samplers – and, occasionally, the whole program – for publicity purposes are established practices and a form of embargoed publishing. However, those are the only recognized exceptions to a firm rule that prohibits others, most especially participants and funders, from seeing a program before its first publication.

61. Only members of the production team, the producing organization, PBS, and others approved by the Executive Producer, such as independent consultants, should be permitted to view rushes, rough cuts, or any segments of the film before completion. This rule does not preclude checking the accuracy of relevant sections in a film if necessary, by sharing it in print, orally or visually with a participant. If the Executive Producer has agreed to the extremely rare case of a national security review, such review should be disclosed (see 26).

62. There is also a well-recognized, but limited, exception to this rule against prescreening for certain filmmakers who obtain access to intimate personal portraits. The Executive Producer should approve such exceptions in advance. The fact that participants reviewed the footage may have to be disclosed.

63. The broadcast, web and podcast releases must be the first publication of the editorial content, unless a pre-release of a program at a film festival or theater, for

instance, is approved in advance by the Executive Producer, VP for National Programs and/or the Editor in Chief of GBH News or other senior GBH management.

#### Do Not Show Outtakes or Notes to Outside Parties

64. It is vital that outtakes and notes not be shared with outside parties (e.g., police, litigants, their lawyers, interested parties, critics) unless compelled by legal action as determined by GBH. However, the licensing of outtakes or sharing of research material with other broadcasters and journalists may be called for either by contract or mutual agreement. (See "Business and Commercial Guidelines.") Whenever the question arises, it should be brought to the Executive Producer's attention.

#### Prepare for Legal Review

65. Producers in all formats should anticipate a legal as well as editorial review of their work. For its own purposes, and not to relieve the independent producer of any contractual obligations, the GBH Legal Department also will review the program at rough-cut and at additional stages as necessary. It is especially important that independent producers seek GBH guidance before deciding not to include or to remove material on legal grounds.

66. Legal review may deal with the issue of "fair use" of copyrighted material. It is worth noting that there can never be a "fair use" issue if the material is obtained directly from the copyright holder as part of an agreement. A producer must obtain material from a third party and use the material in the appropriate context before he/she begins the process of assessing whether the use is a "fair" one. Please advise the appropriate legal counsel as early as possible if "fair use" claims are anticipated.

67. The legal review will also look closely at material with the potential for generating defamation and invasion of privacy claims. Any program intending to publish material accusing others of wrongdoing or improper activities will be held to rigorous scrutiny under these guidelines. Further legal matters may include: releases and rights clearances; FCC rules on indecency; and the special provision governing "equal time" during election cycles.

68. Finally, all producers should make themselves aware of the statutory prohibitions against payola and plugola. A brief description of those terms is at the end of these guidelines. (See "GBH Payola/Plugola Policies").

## Help with Corrections and Updating

69. After broadcast or publication, producers are expected to immediately bring to the attention of the Executive Producer any errors that the producer becomes aware of and to help in making any necessary corrections. If the error involves a misstatement calling into question the character or reputation of an individual, company or product, then the producer must consult with the GBH Legal Department before taking any steps to correct it and before responding to the complainant directly. Producers also may be called upon to provide information for purposes of updating a program that is going to be repeated or pre-published.

## Help with Digital and Social Media Production

70. Producers are expected to work with digital and social media producers or others in providing materials and ideas for production of online, digital and social media assets and podcasts – including in the event these assets are being made complementary to or separate from broadcast of the program. Production and publication of digital and social media assets are subject to the guidelines set forth in this document and to a separate set of special guidelines written with the digital/social environment in mind. Therefore, if new production takes place, extended interviews are published or there is new reporting, it must be subjected to the same rigorous editorial process that applies to broadcast. The same standard applies to the production of a DVD.

## SOCIAL MEDIA GUIDELINES

### Introduction

Although all GBH employees are subject to the general GBH Social Media Policy outlined in the Employee Code of Ethics, editorial employees are subject to additional standards meant to protect the journalistic integrity of individual productions and GBH as a whole. These standards apply to activities on personal social media accounts and any official brand accounts that you may manage. What follows has been informed by many conversations with journalists at GBH News, The World, FRONTLINE, NOVA and social media producers throughout the Foundation. Many central tenets were adopted from social media policies from across the news industry. Social media platforms provide GBH's hosts, reporters, talent and other editorial employees unique opportunities to engage with audiences directly, publish and spread the word about our work, and identify and cultivate sources and story ideas. But just as on other platforms, it is imperative that editorial employees be mindful that their behavior on social media may have an impact on the reputation of GBH and our journalism. Each of the following

standards is important, and all are informed by a basic principle: You generally should not post anything on social media that you wouldn't say on-air or online, or that would violate GBH editorial standards, as it may undermine your credibility and integrity as a journalist as well as that of your series and GBH. For clarity, it is understood that social media is an evolving form. Given this mutable state, new practices and new challenges will arise. Consult your senior editorial manager for help or guidance when you are unsure; these managers are responsible for ensuring that this policy is followed by staff members in their departments. Violations of these standards could lead to disciplinary action and/or notation on performance reviews.

### Verify

71. Apply the same editorial judgment and standards that you apply to other parts of your work. This principle applies to retweets and shares as well, especially in the event of breaking news. When you point to what others are saying, many may interpret this to mean you are reporting that information yourself or confirming/asserting its accuracy. When possible, be clear about the current state of a story, reporting what has and has not been confirmed. Also, take steps to verify the legitimacy of a social account or profile that appears to belong to someone central to a story, and don't assume that verification (a blue checkmark) means that the poster is in fact that individual.

72. When using quotes, photos or video from social networks, attribute them, ideally to the name, account or platform where you found the material. When feasible, it is best practice to reach out and message the user to get more detailed information about the origin of that information or material.

73. Just as in the case with other editorial work, make efforts to vet photos and videos for accuracy and authenticity.

### Interact Responsibly

74. Social media can be a powerful place to challenge others and elicit compelling and frank discussions, yet the conduct of editorial employees in these exchanges should continue to be guided by GBH editorial standards of transparency, accuracy and fairness. Interactions on social media should always be respectful. If a post or exchange becomes aggressive, it may be best not to respond. Inform your manager if you feel threatened by a post or exchange on social media.

75. Different social media platforms, and communities on those platforms, have their own culture, etiquette and norms. Respect these informal rules, and understand how



your behavior in these groups might be helpful or harmful to your reporting or programming. Recognize that the presence of a reporter in a social media community or group might be considered intrusive and conduct yourself accordingly.

### Avoid Advocacy

76. GBH's policy on political and advocacy activity, cited above and in the GBH Code of Ethics, extends to social media. Analysis and thoughtful scrutiny is encouraged, but advocating political views or editorializing – even some humor – can undermine your and our journalism and are not appropriate. The exception is the case of commentators and people whose job it is to express editorial opinions.

77. Social media platforms blur the lines between our personal and professional selves. As an editorial employee of GBH, one must remember that every post or "like" is to some degree public and may have an impact on the organization. Be mindful that even participation in partisan social media groups – liking, friending, retweeting or RSVP'ing to an event – may be interpreted as an endorsement. However, this policy should not be interpreted as a ban on joining or following groups or individuals for reporting purposes. Be mindful of patterns in whom you choose to "follow" on social media platforms; consider following a broad range of voices and sources. Always consult with your editorial supervisor if there is any question about whether your behavior could be a violation of the policy.

### Consider Rights when Posting

78. When natively posting video, image or audio content, proper branding and attribution should be applied. Consult with a manager and/or GBH Legal, when necessary, to confirm that you have the legal right to post that image, video or other type of media. Just as you would when seeking to publish elsewhere, make efforts to ensure that you are dealing with the people who have the authority to give you permission.

### Be Transparent

79. As an editorial GBH employee, you are encouraged to have accounts on social networks to enhance your reporting, build a following, and contribute to building a strong reputation for GBH as a news leader and trusted brand. If you use your social media account for work in any way, identify yourself as an employee of your production or show, ideally in your bio or profile rather than your username. Use a personal image (never a brand logo) as your profile photo. If you are a commentator or someone who

provides opinion as part of your editorial work, just as you would elsewhere, this should be clear in any social media posting.

80. Be honest about your intent when reporting. If as part of your work you are posting comments, tweeting, replying or interacting in any way as a reporter, do your best to identify yourself and your work if your profile on that platform does not provide that information. In rare instances where there is a compelling reason to use a pseudonym or go undercover, approval from senior editorial is required.

81. Whenever possible, add a qualifying comment to any reposts or shares that might be perceived as advocacy or endorsing an opinion on a political or controversial issue. This applies even if your profile says reshared posts do not signify endorsements – many people who see your and/or retweets posts will never look at your Twitter bio.

#### Be Accountable

82. Social media can help you build your reputation as a leader in your field. But because social media is an extension of your professional identity – if handled poorly – it can have negative repercussions just as easily as positive ones. Erroneous posts about stories, sources, programming or your reporting, or other posts that have the potential to harm the brand of your production or GBH, should be corrected quickly and transparently, in a fashion that represents the overall intent of GBH editorial guidelines. This applies to GBH-related posts on personal accounts as well. Consult your senior editorial manager when you receive new information that indicates you have made a mistake or sent out false information to determine the best way to address the situation.

83. If you are ever in doubt about a post or interaction, enlist a second pair of eyes, whether it be a senior editorial leader or your direct manager.

#### BUSINESS AND COMMERCIAL GUIDELINES

84. GBH has a complex set of business practices that are usually covered in the specifics of contracts with independent producers and by longstanding patterns and practices within the station. Producers should involve the Executive Producer and in turn the VP for National Programs and/or the Editor in Chief of GBH News and/or other senior GBH management in any issues that cannot be resolved in the normal course of the contracting process or whenever business relationships need to be defined. Because business practices often intersect with editorial concerns, guidelines on certain of those issues (which do not apply to “lifestyle” programs) are enumerated below:

## Co-Producers and Partners

85. Producers may bring or be asked to work with a co-producer. Whether a co-producer brings money, access to money, editorial input, personnel or other resources to a project, final decision-making must rest with the producer and the Executive Producer for the GBH and public radio/television version of the program. The co-production credit carries with it the implication of an editorial role for the co-producer. This means that the co-producer must share a journalistic sensibility similar to our own and that any funding received by the co-producer is subject to review by GBH. Special note: It is not typically appropriate to co-produce with an entity whose ideas and activities are the subject matter of the program. However, the Executive Producer may make exceptions when the entity is a research college, university or other educational institution and there are no conflicts of interests or other factors that would conflict with GBH standards.

86. Sometimes the term “editorial partner” is used. The term connotes a significant editorial relationship. All editorial partners should have an independent stance toward the content. Thus, other publishers – broadcasters, print, independent producers and specialized data providers – are all viable editorial partners. No editorial partner can have editorial control over what GBH finally publishes.

87. Producers may be asked to work on acquired programs. In these cases, the entity or producer bringing the project to us may have already exercised editorial judgment. Nonetheless it is our responsibility to review the project’s funding, to assess the editorial soundness of the program, to engage in a fact-checking process, and to require changes or to reversion it to the extent necessary in order to meet our editorial standards.

88. Producers may be asked to work on programs that will be distributed other than by PBS. If this occurs, the Executive Producer and in turn the VP of National Programming and/or Editor in Chief of GBH News and/or other senior GBH management will determine the extent to which these guidelines apply. It is assumed that the highest ethical standards and best journalistic practices will be maintained if the GBH production brand name is used.

## Commercial Issues

89. Product placement. Audiences must be able to trust the information in our programs, but that trust could be jeopardized by the appearance of commercialism. At one extreme would be a perception that the program was created primarily to sell the

funders' productions and services. Thus, a producer must avoid any arrangement in which an entity is paying for placement or use of its product or service in the program. If a producer needs to use products associated with the content of the program in the course of making it, best practice is to cover the names of those products or arrange in a way that the brand label/name is not visible, but if that is not feasible, then the funder's products can be used so long as they are treated no better or worse than other brands. The use of particular products in a program to demonstrate a point is an editorial decision. If products are donated, proper recognition belongs in the credits. Nothing in this rule would prevent the appearance of products in the course of reporting a story about the products themselves, nor would it violate the rule if the product appeared naturally in the course of shooting a location.

90. Licensing monies. Licensing decisions, unless otherwise stated by contract, are made by GBH. Licensing monies derived from the program, program content or products derived from the program's content are paid to GBH for use at its discretion. The development of the program's content should normally precede licensing deals to avoid the appearance that the content was created solely in response to marketing concerns. Licensing deals should associate the brand name only with products and services that enhance the brand name. Products and services that are editorially incompatible with the program's mission should be avoided.

91. Underwriting monies. Underwriting decisions are made by the individual series executives, subject to the approval of GBH. There are separate guidelines governing financial support for public media content that must be followed. In general, the development of the program's content should precede creation of underwriting proposals to avoid the appearance that the content was created solely in response to funder concerns, and in all cases there should be a clear separation between any funders and the process of creating the content. Decisions to accept support from foundations or individual donors must be guided by the relevant GBH and PBS funding standards, and common sense in the effort to avoid even the appearance of a conflict of interest.

92. Endorsement. Neither the talent nor any member of the production team of a GBH program is allowed to endorse products or services associated with the content of the program. Similarly, a program's brand name should never be used for endorsement purposes. The obvious exception to this rule is the appearance of a program's brand name on GBH licensed products; producers and talent are cautioned not to endorse even these unless the licensed product (or service) directly furthers the overall educational mission of the program (i.e., a companion book/recording of the program).

In some circumstances, with approval of the Executive Producer, host-read underwriter spots, for example in podcasts, may be permissible and not considered endorsements.

93. Publicity events. Talent and producers can participate in publicity events that are arranged by a business partner or funder. However, such events should reflect an opportunity to present information about the program's mission, not an opportunity to directly or indirectly endorse products and services. Also, publicity events should not be so numerous or demanding as to interfere with the editorial and production responsibilities of the talent and/or producer.

94. Companion materials. All companion book deals and licensing arrangements must be dealt with in accordance with the procedures set up by the GBH Enterprises Board/PBSd and PBS guidelines.

95. Syndication of content. Producers should consult with the Executive Producer on the procedures to maintain the right of editorial approval of the syndication of limited amounts of the program for promotional purposes. Producers should also consult on the procedures GBH has in place to assure that intakes and outtakes made available for sale to third parties do not include highly sensitive material or uniquely created material unless approved by the project, the Executive Producer, and if appropriate, the Vice President of National Programming or Editor in Chief of GBH News or other senior GBH management. Because of the longstanding practice of protecting outtakes from subpoena in public affairs programs, outtake interviews in these kinds of programs should not be available for sale. Interview material included in programs should not be sold without the necessary approvals and until the buyer obtains a new release from the participant.

#### GBH / NONCOMMERCIAL / PAYOLA / PLUGOLA POLICIES

96. Most of the material produced by GBH is intended for noncommercial broadcasting. Accordingly, federal statutes and regulations prohibit the inclusion in programming, in return for consideration (monetary or non-monetary), any material that may be promotional.

97. In addition to these prohibitions, federal law prohibits all broadcast station officials, employees, or any other persons (including production personnel and program licensors or suppliers) from paying or receiving money, services, or other valuable consideration for the broadcast of any matter over the station. This is the offense commonly known as "payola."

98. Violators may be fined up to \$10,000, imprisoned for up to one year or both. The selection of music and other creative elements – including persons selected to participate, the use of scenic properties, and the inclusion in programs of any identification of commercial products or services and their trade names or slogans – must be dictated only by the requirements of the program itself. Advance disclosure of the payment of consideration for the broadcast of any matter must be made to the GBH Vice President responsible for that production area. (Remember, however, that rules governing noncommercial broadcasting may prohibit inclusion of these materials even when prior disclosure is made to GBH.)

99. “Plugola” occurs when a station employee broadcasts matter that directly or indirectly promotes goods in which the employee (or her/his immediate family) has a financial interest, without disclosing that financial interest to the station. Any conflict of interest must be reported to the GBH Vice President responsible for that production area.

100. If you have questions about “payola/plugola” or your responsibilities under these laws, please contact the Executive Producer or editorial manager and the GBH Legal Department.