



SEYCHELLES BROADCASTING CORPORATION



EDITORIAL GUIDELINES

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FOREWORD BY THE CHAIRMAN

The SBC belongs to the people of Seychelles.

These published editorial guidelines, a first for the SBC, and endorsed by its Board of Directors, embrace the Corporation's responsibilities under its mandate, along with the editorial and ethical expectations of the Seychellois people.

It comes during a period of rapid political transformation where the SBC's role is under close scrutiny. In the current transition from being a State Broadcaster to an independent and impartial National Broadcaster, public perception will take time to readjust. The strict adherence to these guidelines is fundamental in this process. In doing so, the SBC should be brave in reporting without fear or favour, even when the issues may be uncomfortable or unpopular.

In recognizing that it will never be possible to produce content which satisfies its entire audience all the time, these guidelines should serve as the primary tool for our content-makers to ensure that content produced and disseminated by the SBC upholds the fundamental journalistic principles of accuracy, impartiality and high ethical standards.

This document also aims at ensuring that the SBC's programmes show respect towards different groups and is mindful of accepted moral standards.

Ensuring adherence to journalistic standards, however, should not limit creativity. The SBC should continue to find new ways of inspiring the Seychellois public, by telling human-interest stories which reflect Seychellois culture, producing informative and educational programmes, and discussing the conversations of the day.

It is by adhering to the principles contained in these Editorial Guidelines that the SBC can earn respect and retain the public's confidence and be accountable to its owners, the Seychellois people.

Gérard Lafortune

FOREWORD BY THE CHIEF EXECUTIVE OFFICER

The editorial independence entrusted to the SBC by the people of Seychelles, through the SBC Act, comes with many important responsibilities.

The National Broadcaster is expected to be accurate and impartial in its reporting and programming.

These journalistic standards are not new; they are the tenets of responsible broadcasters and media houses around the world. As such, we have not ‘reinvented the script’; in producing its own guidelines, the SBC has adopted and adapted these best practices.

The smallness of our nation and closeness of our communities place an even bigger burden on us not to cause undue harm or offence.

Ensuring truth and fairness in our outputs goes beyond our credibility or reputation; we must do what is right to deliver on the legal and moral responsibilities that our editorial independence demands.

By publishing these Editorial guidelines, we are providing a public undertaking to do just that, without fear or favour.

Bérard Duprès

INTRODUCTION

Established through the SBC Act of 1992, the Seychelles Broadcasting Corporation (SBC) is mandated to inform, educate and entertain the public and to ensure a balanced development of broadcasting on radio and television.

As the national broadcaster, the SBC must ensure that it always maintains high ethical and editorial standards. It must ensure that all contents it produces and/or broadcasts adhere to the principle of fairness, accuracy and impartiality.

The Corporation is therefore guided by a number of objectives outlined in the SBC Act, notably:

- safeguarding the citizen's right to be informed freely, truthfully and objectively on all matters of public interest, national or international, and presenting a fair and balanced flow of information, including contrasting views, without advocating any opinion or ideology of its own;
- taking special steps to protect the interests of children, the elderly, persons with disabilities and other vulnerable sections of the community;
- ensuring that its programmes:
 - i. do not offend against decency and public morality; and
 - ii. generally, do not outrage public feeling or create ill-will between different public groups;

These Editorial Guidelines are therefore aimed at setting out the standards under which any programmes will be acceptable for broadcast on the SBC's platforms.

These guidelines will also serve to inform and advise content-makers (journalists, presenters, producers, and all involved in producing programmes) on the editorial standards that the Corporation expects them to uphold.

These guidelines will similarly inform the audience on the editorial values that the SBC will adhere to.

The document will also assist output staff and the SBC's Editorial Committee to navigate difficult and sometimes controversial editorial issues so that compelling content can be made to the highest standards possible. It should in no way prevent journalists and producers from pushing boundaries to attain truthful, accurate and sometimes provocative information to satisfy the public's right to know.

1. INDEPENDENCE & INTEGRITY

The SBC is guided by article 168 of the Constitution which states that:

“The State shall ensure that all broadcasting media which it owns or controls or which receive a contribution from the public fund are so constituted and managed that they operate independently of the State and of the political or other influence of other bodies, persons or political parties.”

An independent SBC means the absence of external control and undue influence on the Corporation and its staff.

The trust and respect of the audience depend largely on the independence and integrity of the SBC as the national broadcaster.

In order to main its independence and integrity the SBC shall:

- exercise editorial control over all contents that it broadcasts on its TV and Radio channels or publishes on its multimedia platforms
- ensure that editorial decisions are not improperly influenced by the government, political parties or any other bodies, groups, or individuals
- ensure content-makers are not unduly pressured by any groups or individuals
- ensure that outputs staff’s political, religious, or other personal views, or activities, do not compromise the independence and integrity of the SBC

2. BASIC EDITORIAL PRINCIPLES

The SBC's content must reflect established journalistic principles.

These principles include being truthful, accurate, objective, fair and impartial.

Truthfulness: Journalists' primary responsibility is to seek the truth and to subsequently report the truth.

This entails verifying and scrutinising the facts and putting them together so that they tell the story like it is, honestly, fairly and reliably, without distortion.

It can therefore be argued that all other principles stem from the ethos of Truthfulness.

Accuracy: Must provide correct and reliable information that is not in any way misleading or false.

- This demands careful and thorough research and disciplined use of language and production technique.

Objectivity: Must provide factual information, free from personal bias or opinion, not distorted to justify a predetermined conclusion.

Fairness: Must report equitably all relevant facts and significant points of views while dealing fairly and ethically with persons, institutions, issues and events.

- Fairness does not mean being unquestioning, or that every side of an issue should receive the same amount of time.

Impartiality: Must not favour one side over another.

In order to maintain a high level of accuracy and fairness in its reporting and programming, the SBC will be guided by these basic Editorial principles and will:

- Report and present news, current affairs and factual programmes truthfully by disclosing all the essential facts.
- Present viewers and listeners with a variety of views without suppressing relevant, available facts, nor distorting the truth by wrong or improper emphasis.
- Present all sides of a story, as far as practicable, and based on information that are available, in order to achieve balance in the story.
 - Balance may not always be achieved in a single programme or news bulletin but should be done within a reasonable timeframe.
- Make editorial decisions based on the merit and public interest of a news item.
- Not allow advertising, commercial, political or personal considerations to influence editorial decisions.
- Treat people taking part in a news item or other programmes fairly and with respect.
- Uphold the principle of journalistic freedom.
 - The protection of a journalists' source is an important part of this principle.
- Take great care in the presentation of brutality, violence, atrocities and personal grief.
- Respect a person's legitimate right to privacy and not intrude into private grief and distress. (Unless it is justified by overriding considerations of public interest.)
- Help to protect Human Rights, notably in ensuring that instances of harm or discrimination to any groups or individuals are promptly and appropriately reported.

3. ACCURACY

Accuracy underpins the integrity and trustworthiness of any media organisation.

Accuracy includes:

- double-checking of facts
- validation of information submitted
- obtaining information from first-hand sources, as far as practicable
- confirmation via at least two reliable sources
- corroboration and probing of any claims or allegations made

Accuracy must take precedence over delivering at speed.

Research for all programmes must be thorough. Simple information like dates, figures and titles must be checked and re-checked.

A journalist must look for confirmation from more than one source and/or look for a report from more than one news agency.

It is important to distinguish between first-hand and second-hand sources. Wherever possible, journalists should gather information first-hand by being there, and where that is not possible by talking to those who were.

The SBC will attribute every source, claim and figure quoted.

The journalist, presenter or producer must not exaggerate and avoid judgements or opinions.

If there is a gap between recording a programme and putting it on air, content-makers must check to make sure it has not got out of date or has been overtaken by events. (For example, the arrest of an offender being superseded by the person being charged.)

Likewise, if a programme is being repeated it may need to be amended to maintain accuracy.

3.1 Correcting Mistakes

A commitment to accuracy includes a willingness to correct errors and clarify ambiguous or misleading information.

Corrections and clarifications also contribute in achieving fairness and impartiality.

When a serious factual error does occur, the SBC shall admit it clearly and frankly, correcting what was wrong and offering an apology, if appropriate. This will be done as soon as reasonably practicable.

3.2 Right of Reply

The “Right to Reply” is based on the basic journalistic principle of fairness and the need for remedial action when it has been established that unfairness has occurred.

When the SBC makes allegations of wrongdoing, incompetence or lays out a strong and damaging picture of an individual, group or institution, those criticised will be provided with the "Right of Reply" to respond to the allegations.

The opportunity to reply will be given in a programme of similar weight and audience.

The type of remedial action will be determined by taking into account the nature and the occasion of the unfairness. It can also take different forms, e.g. an interview, a statement that is read out on air or a report where the allegations are responded to.

4. IMPARTIALITY

Impartiality entails being aware of the need for news and other programmes to be presented in a fair and balanced manner, without taking sides.

To achieve impartiality, fairness and honesty must be a Corporate value.

Opposing relevant views must generally be given fair amount of airtime. Fair does not necessarily mean equal amount of airtime, but that there is equitable access for opposing or different views.

Impartiality also means reflecting the breadth and diversity of opinion across all our outputs as a whole.

4.1 Achieving impartiality in news and other factual programmes

News coverage should be free from discrimination and bias against particular religions, nationalities, political parties, groups or individuals.

To achieve balance and fairness, the widest possible range of views must be expressed.

Programming cannot be limited to what the largest audience wants to know. It must include what the public is entitled to know and needs to know. The challenging of accepted orthodoxies should be reported, but the established views must also be clearly put.

Programmes must have breadth and depth. Reporting must not be too simplistic so as to prevent the audience from having an adequate understanding of the issues.

4.2 Achieving balance

Balance means reflecting opposing views without bias and allowing all sides enough airtime to communicate their views.

Balance is a crucial element of impartiality, but impartial treatment of an issue or topic does not mean always opposing one view with another.

It follows therefore that balance cannot always be achieved in all news stories or programmes.

The SBC will not always require differing viewpoints to be presented evenly or with equal airtime. In some circumstances, when justified by the weight of evidence, the SBC will give more time or space to one perspective over another.

In order to ensure impartiality, the SBC will:

- report the story from a neutral point of view.
- determine an angle that does not side with one group or with one view over another.
- give all sides to a question and ensure all viewpoints are presented.
- make sure opposing views are represented by talking to multiple sources for a story.
- when an appropriate representative of one side of the story cannot be reached, the journalist or producer shall make every effort to find someone who can represent that point of view. And if unable to do so, they shall say so.
- where necessary and possible, achieve impartiality over a number of programmes, and making it clear to the audiences that it is doing it as such.
- consider making follow up discussions or other programme formats such as phone-ins as alternative methods of achieving impartiality.
- where necessary and possible, talk to the silent majority, or groups of people, notably minority groups, who may otherwise remain silent on an issue.

5. FAIRNESS AND STRAIGHT DEALING

Content-making should be based on fairness, openness, and straight dealing.

5.1 Content Contributors

Contributors should be treated honestly and with respect.

From the start, content-makers should be as clear as they can about the nature of the programme and its purpose. They shall be open about their plans and honest with everyone taking part in a programme.

Whether they are public figures or ordinary citizens, contributors ought to be able to assume that they will be dealt with in a fair manner. They should not feel misled, deceived or misrepresented before, during or after the programme.

Contributors have a right to know:

- what the content is about;
- what kind of contribution they are expected to make: (interview, debate, live phone-in, discussion);
- who the other participants are;
- whether it will be live or recorded and whether it will be edited.

Contributors should not be given a guarantee that their contribution will be broadcast. However, content-makers should not record a substantial contribution unless they expect to use it.

The need for fairness applies equally to persons asked for help and advice in the preparation of programmes. They shall be told why they are being contacted and what the content is about.

There may be occasions when content-makers cannot be frank with contributors, where there is a clear public interest in dealing with serious illegal, immoral or anti-social behaviour.

Deception should be the minimum necessary and only after approval has been granted by senior management.

Some contributors may ask to see/hear a copy of the programme before it is broadcast. It is generally unwise to agree to this in order to maintain editorial independence, and probably for legal reasons. There may, however, be special circumstances when a preview is allowed without surrendering editorial control.

5.2 Protection of sources

Protecting sources is a key tenet of journalism when the information which the public should know is sometimes only available through a confidential source. Off-the-record conversations take place frequently between journalists and public figures. If the confidentiality of sources is not respected as a matter of principle, this would inhibit the free flow of information, which is essential to the vitality of a democratic society.

Information from someone who wishes to remain anonymous (or be on a non-attributable basis) may be used if the source is known to the journalist and has a record of reliability. However, to avoid the possibility of being manipulated to broadcast inaccurate or biased information, the journalist must seek corroboration from other sources.

Promises of confidentiality given to a source or contributor must be honoured. The Corporation's integrity and the journalist's trustworthiness will suffer if persons who have provided information on condition that they remain anonymous are subsequently identified.

5.3 Anonymity

Accuracy and integrity in journalism require that the identity and credentials of an interviewee be evident to the audience.

If an interviewee or participant in a programme is concealed or has their voice distorted, this is tantamount to depriving the audience of pertinent information enabling the viewer or listener to make a judgment on such comments. The credibility of the programme can be undermined by the use of anonymous contributors whose status the audience cannot judge.

While there is no absolute obligation to name all programme contributors, in most cases, both contributors and audiences would expect speakers to be identified, especially if the contribution is significant.

Decision not to name a source/interviewee must be solely in order to protect that person:

- for reasons of safety e.g. where personal safety of the source or his family may be jeopardised by identification.
- if the subject being addressed is a delicate one e.g. health, domestic violence, HIV.
- for legal reasons.

Where anonymity is necessary, content-makers must make sure it is effective. Both picture and voice may need to be disguised.

5.4 Copyright

The Copyright Act 2014 provides a defence which effectively permits, in limited circumstances, the use of copyright material from other sources without infringing copyright. This is called fair dealing and is intended for use when reporting current events.

The SBC shall give credit on air/on screen to the owner of the copyrighted content.

Independent production companies are responsible for any copyright issues in the content they make for the SBC.

5.5 Embargoes

When programme makers accept material that is under embargo, a Press Release for example, the SBC shall undertake to observe the embargo.

In some cases, depending on the nature of the information under embargo, the Corporation may try to persuade the organisation in question to lift the embargo.

If other media houses break an embargo, the SBC will explore if it is justified to do likewise. It normally will base its decision on whether the disregarding of the embargo has been widespread before deciding if it will follow suit.

6. CREDIBILITY

Credibility is an essential attribute of any media organisation. The credibility of the organisation and that of its journalists are inter-linked.

Credibility is dependent, not only on factors such as accuracy and truthfulness in reporting, but also by avoiding associations or contacts which could reasonably give rise to perceptions of partiality.

The SBC's content should offer viewers and listeners an intelligent and informed account of issues that enables them to form their own views.

An SBC reporter/journalist or presenter may express a professional journalistic judgement but not a personal opinion. That judgement must be recognized as perceptive and fair. Audiences should not be able to tell the on-air talent's personal views on any controversial issue from a programme.

Content-makers, such as journalists, like anyone else, will have opinions of their own. But they must not yield to bias or prejudice.

For a media person to be professional is not to be without opinions, but to be aware of those opinions and make allowances for them so that their reporting is and appears to be, judicious and fair.

In order to maintain the Corporation's credibility and the credibility of the station involved, on-air personnel as well as those who edit, produce or manage programmes must avoid publicly identifying themselves in any way with partisan statements or actions on controversial matters.

7. TASTE AND DECENCY

Our programmes should be in good taste by respecting and reflecting the generally accepted values in society regarding such matters as vulgarity, profanity or sexual behaviour.

Our audience is composed of differing groups and notions of good taste vary substantially among them. Where matters of taste are concerned, therefore, care must be taken not to cause undue offence to the audience.

Notions of what is in good taste and what is considered decent are often simply matters of judgement.

Instead of completely banning anything which might give offence, the SBC shall wherever practicable:

- give the audience clear and adequate warning beforehand when materials may upset viewers/listeners.
 - Advance warning means viewers can make their own choices about what they want to see and hear; and any offence caused can be kept to a minimum.
- be very careful in their scheduling of such material. Do not let material that viewers and listeners might find threatening or shocking intrude unexpectedly, taking the audience by surprise.
- make sure materials that are unsuitable for children are not broadcast at a time when they are likely to be watching or listening.

While the SBC will do everything possible to minimize what audiences might find distasteful. A public broadcaster nevertheless has a duty to deal frankly with controversial topics, such as HIV/AIDS for example, and will therefore not always be able to avoid tackling issues so as not to offend certain people.

7.1 Discrimination and Stereotypes

It is imperative that the SBC does not broadcast programmes that encourage discrimination or stereotyping on the grounds of race, national or ethnic origin, colour, religion, gender, sexual orientation, age, or disability.

To this end we are committed to avoiding language and images that reinforce stereotypes and offend groups or individuals.

We also undertake to raise awareness of different forms of discrimination by encouraging debate and discussion of these issues.

7.2 Persons with Disabilities

People with disabilities often feel marginalised. Programmes should reflect issues of disability in a way that does not perpetuate harmful negative stereotypes of the disabled.

The SBC shall ensure that all its reports and programmes treat people with disabilities fairly, decently and with respect. Their disabilities or impairment shall not be highlighted or focussed upon unless warranted by story context.

When dealing with people with disabilities, the SBC will:

- refer to them as “persons with disabilities” in line with the United Nations guidelines instead of “handicapped “
- avoid labelling them with their impairment or using negative language to describe their disability.
- whenever possible, try to get people with disabilities to talk about themselves unless it is hard to understand them when they talk.
- avoid using terms designed to engender empathy or compassion for persons with disabilities, simply because they are different from other people.

8. CHILDREN

Children can be involved in programmes in several ways; as actors, interviewees, participants in or as subjects of programmes.

The use of children in programmes requires handling with great care.

In Seychelles, there are laws such as the Children Act 1982 to protect the rights of children. The rights of children living in Care Homes are further protected by a policy issued by the Ministry of Family Affairs in 2017. Entitled “Safeguarding the Privacy of Children in the Media”, Section 6 of the Policy outlines procedures for the media to film, photograph or talk to children living in homes.

Special care shall also be taken to ensure that programmes children are likely to watch unsupervised would not cause alarm or distress or incite aggressive behaviour.

Offering children enjoyable and enriching programmes should not be confused with concealing the real world from them.

8.1 Children as listeners and viewers

In considering matters of taste and decency, the SBC shall ensure that:

- material that is unsuitable for children are not to be broadcast at times when large numbers of them may be expected to be part of the audience.
- particular care is taken in depicting violence in children’s programmes.
- animated programmes do not have violence as a central theme and do not invite dangerous imitation.
- themes that threaten a child’s sense of security, themes like domestic conflict, death, crime or the use of drugs are treated with care.
- programmes for children shall not contain realistic scenes of violence which create the impression that violence is the best way to resolve conflict.
- children’s cartoons avoid gratuitous violence.
- advertisements directed at adults are not broadcast during children’s programmes.
- the rights of children and young people not to be exploited, humiliated or unnecessarily identified.
- where hazardous activities, such as climbing, swimming or cycling are portrayed, warnings shall be given of the dangers of trying to imitate without expert supervision.

8.2 Children as interviewees

The views of children and young people are legitimate and, if possible, should be sought on issues which affect them, rather than interviewing an adult to speak on their behalf.

Children shall be interviewed with care. Children are often open to suggestion and can be led in questioning. Young children may have difficulty in distinguishing reality from fantasy. Teenagers cannot always distinguish truth from hearsay and gossip.

Before significant participation in programmes by children:

- Consent shall normally be gained from both the children and their parents, guardians or those responsible for them. This is crucial when dealing with controversial and sensitive issues such as domestic violence, truancy, child abuse or any dangerous and illegal activities.
- When dealing with issues involving children, producers and journalists shall consider being accompanied by a representative of an agency involved in child protection such as the National Council for Children, the Family Affairs Department or others.
- Consider concealing the identity of children when talking about sensitive issues, when it might be in the interest of the child to do so.

8.3 Children as subjects of legal stories and programmes

The SBC is obliged by law to protect the privacy of children involved in legal cases. Proceedings of the courts or tribunals may only be published with the Judge's permission but with a strict prohibition on identifying young people or their guardians or any other information (such as their school) which may lead to their identification.

The SBC shall not identify witnesses under 17 or the victims of sexual crimes.

In interviewing adults about their own life or activity, we must be careful that they do not directly or indirectly identify any children as victims of sexual crimes.

9. PROGRAMME CLASSIFICATION

Scheduling decisions need to balance the protection of young people with the rights of all viewers, including those without children, to receive a full range of subject matters throughout the day. They must also be judged against the requirements of the watershed.

The basic principle of the watershed is that material which is unsuitable for children cannot be broadcast before 9 p.m. as large numbers of children are likely to be viewing. These are programmes which are intended for adult audiences, which deal with controversial themes, or contain scenes of violence, sexually explicit conduct, nudity, swearing, with bad or profane language.

Particular care shall also be taken in the period immediately after the watershed. The transition to more adult programming shall be gradual as children often watch beyond this time, particularly during the school holidays.

The SBC has a responsibility to ensure that audiences have enough information upon which to judge if a programme is likely to be one, they want to watch or listen to or if it is suitable for their children.

In some cases, the programme may simply require a warning. e.g. “this report contains scenes which may upset some viewers”.

In order to ensure that it distinguishes between content for different age groups and programmes to be broadcast after the watershed, the SBC shall, as far as practicable, use the following classification codes:

- ALL – Suitable for all ages
- 10 – Suitable for viewers ages 10+, parental guidance is suggested for viewers younger than 10
- 13 – Suitable for viewers ages 13+, parental guidance is suggested for younger viewers
- 16 – Suitable for viewers ages 16+. May contain strong language and strong violence.
- 18 – Not suitable for persons under 18. May contain explicit violence, extreme language and sexual activity.
- PG - Parental guidance is recommended for younger viewers. Content is mild in impact but elements in these programmes may require parental supervision for young children.
- PG -10 - Parental guidance is suggested for viewers younger than 10
- PG - 13 - Parental guidance is recommended for viewers younger than 13
- R - 18 – programmes containing adult themes and directed primarily at mature audiences

Current Affairs programmes which may be scheduled at any time are not subject to the classification system. However, the Corporation need to remember that young people may be among viewers of news and current affairs programmes and shall give consideration to including warnings where appropriate.

In addition, the SBC will ensure the following:

- Use warnings to alert the audience in advance where content is likely to offend or disturb a significant proportion of the audience.
- Promotional material such as programme trailers comply in content with the classification band in which they are shown. For example, trailers for an R-18 movie broadcast during peak times must not contain scenes that are not suitable for the general audience. Otherwise, they will be broadcast after the watershed.
- News flashes prepared for screening outside regular news bulletins, particularly during children's viewing hours, will avoid unnecessary distress or alarm.

10. BREAKING NEWS

Breaking News refers to events that are currently developing or just happened and warrants the interruption of scheduled programming and/or current news in order to report on the details. Breaking news usually refers to events that are unexpected.

What constitutes a typical breaking news will be determined by a member of the SBC's Senior Management team, the Head of News, in particular. The information must be made available on all SBC platforms.

When reporting on a breaking news story, SBC journalists will strive for accuracy over speed.

However, waiting until there is definitive information may not necessarily serve the viewer best in certain situations. There are instances when the audience may think that the SBC is holding information from them. The SBC Senior Management will assess such situations on a case by case basis.

When dealing with natural disasters or other tragic events particular attention is required to make sure it is reported in such a way that, as far as possible, protects the dignity of the victims and their families.

11. INTERVIEWS

Interviews are a vital tool of journalism and programme making.

An interview should have a clear purpose. People should not be invited for interviews simply because they are major players in a news story unless the journalist have a clear idea of what he/she wants to find out from them.

Interviewers should be well-informed and well prepared.

Interviews shall be searching, sharp, sceptical, but not partial, discourteous or showing an attachment to one side of an argument. Interviewees shall be given a fair chance to set out their full response to a question.

Some interviews are not meant to be challenging, but to inform, explain or entertain. Persons interviewed as eyewitnesses or as experts may need to be encouraged, rather than challenged.

11.1 Fair Dealing with Interviewees

Interviewees should know *why* they are being invited for interviews, what subjects they are going to be asked about, the context of the programme and the sort of part they will play in it.

Some interviewees ask in advance what the particular line of questioning may be. This request is not unreasonable, but it should be pointed out that only a broad outline can be given because the interview itself will depend on what the interviewee says.

It is not usually right to submit details of actual questions in advance, nor to give any undertaking about the precise form of questions.

Occasionally, a person who has been interviewed seeks to withdraw permission for the interview to be broadcast. If the journalist/producer nonetheless believes that the interview should be presented in the public interest – a decision a journalist/producer is entitled to take – the matter shall be referred upward to senior management. While there may be occasional exceptions in special circumstances, only personnel with editorial responsibility shall view or hear the programme before broadcast.

While there must be impartiality and fairness in presentation, there must not be external interference in the preparation of programmes. Interviewees cannot be allowed to give directions on how an interview should be edited or broadcast.

11.2 Political Interviews

When a politician is asked, but refuses or is unable to appear, this shall not normally act as a veto on the appearance of other politicians or other outside speakers holding different views. However, there may be occasions when the refusal of a particular key player to take part invalidates the idea behind the programme proposal.

Anyone has a right to refuse to appear in a programme. It is not always necessary to mention a refusal on air. However, where the audience might reasonably expect to hear counter-arguments or where an individual, viewpoint or party is not represented, it would be appropriate to explain that the person concerned “was invited to appear on the programme but declined”.

Politicians and other contributors sometimes try to place conditions on programs before agreeing to take part. Any arrangement reached must not prevent the programme asking questions that audiences would reasonably expect to hear.

Politicians may have an expertise outside the political field. Care must be taken to ensure that frequent use of a particular person in public life, made on valid editorial grounds, do not give any politicians undue advantage over their opponents.

11.3 Live Interviews

Journalists have to be particularly vigilant of the danger of defamatory remarks being made or inappropriate language being used during live interviews.

If a journalist or producer feels that an upcoming interview or live broadcast has the potential for defamatory remarks to be made, they must inform their Head of Section or seek advice from the Deputy CEO before going ahead with the broadcast.

If such remarks and language do inadvertently go on air, the Corporation shall ensure that same is edited before it is repeated or posted on any of its platforms.

11.4 Door-stepping

Door stepping is a legitimate part of news gathering worldwide, whereby journalists regularly catch people in as they enter and leave buildings and put questions to them even though there has been no prior arrangement for an interview.

The SBC may use this technique where other recourse for normal interviews have been exhausted. People in the news must expect to be questioned and recorded by journalists, even if the questions are sometimes unwelcome. This will be predominantly when conducting investigative reports or in venues such as the Court House; Police Station.

11.5 Payment to Politicians

Politicians' appearances on radio and TV to express political views are part of political life. Payments for such appearances are therefore not appropriate. This applies when they answer questions on matters like public policy, international affairs, party politics or constituency issues. Politicians who hold government office or executive office in any elected assembly or have part-responsibilities shall not receive a fee for appearing in interviews or other programmes.

12. PRIVACY

Privacy in the broadest sense means being left alone. It means protecting an individual's personal and private life from intrusion or exposure to public view.

Intrusion is justified only when the individual's private life impinges on or becomes part of his/her public life and is relevant to discussion of a public issue or becomes a matter of legitimate public concern.

Any intrusions must be justified by serving a greater good. Private behaviour, correspondence and conversation shall not be brought into the public domain unless these serve a wider warranted public interest.

12.1 Private Lives and Public Issues

Public figures are in a special position, but they still have rights to a private life. The public should be given facts that bear upon an individual's ability to perform their duties or his/her suitability for office. The public does not have the right to know about a public figure's private behaviour, provided it is legal and does not raise important wider issues.

An individuals' legitimate right to privacy must be respected.

The right to privacy is qualified by:

- **Public interest:** individuals are less entitled to privacy when protection of privacy means concealing matters which are against the public interest.
- **Behaviour:** individuals are less entitled to privacy where their behaviour is criminal, immoral or seriously anti-social.
- **Location:** the right to privacy is clearly much greater in a private property, such as a home, than it is in a public place.

The Corporation shall not do anything that entails intrusion into private grief and distress unless it is justified by overriding considerations of public interest.

In certain circumstances, the public's right to information may take precedence over privacy:

- The public has a right to receive information about public figures and public institutions if the information is in the public interest.
- Invasion of privacy may be justified in order to give information that has a bearing on someone's performance of their public duties and on any matter of public interest.

Where it does not affect public interest, public figures shall have the same right to privacy as others.

12.2 Investigative Journalism

Investigative Journalism plays an important role in pursuing matters of public concern. It helps ensure the media's '4th Pillar' role in a democratic society.

Given its potential effect on the lives of a large part of society, investigative journalism at the SBC must always consider the relative importance of an issue. Even if investigative journalism is robust and thorough in its examination of issues, it must also adhere to the highest ethical and journalistic standards, be in the public interest, offer valuable information and authentic analysis, promote public dialogue, and enable the public to form their own opinions.

SBC content-makers must work transparently and accountably. Clandestine methods of gathering news and information shall be used with due regard to the law, the right to privacy, and the significance of the information. If it were to become necessary and in the public interest to gather the information to which the public does not have access, the matter must be referred to Senior Managers responsible for the respective content outputs.

The SBC shall not normally use hidden cameras and microphones to gather news.

In exceptional circumstances, such as illegal, antisocial, or fraudulent activity, or clear and significant abuse of public trust, and where alternative means of information gathering are not possible, the use of such equipment might be in the public interest. If so, the matter is to be referred to the relevant Senior Manager.

Given its nature, investigative journalism may involve legal considerations. The SBC's legal advisor(s) shall be consulted accordingly.

13. CONFLICT OF INTEREST

In order to maintain its reputation for impartiality and objectivity, the public must be able to trust the integrity of the SBC's programmes and services. The integrity of the SBC is ultimately shaped by the individual integrity of each of its employees in their work and outside personal activities.

Audiences need to be confident that the Corporation's impartiality is not undermined by the outside activities of programme makers or presenters.

The Corporation must be satisfied that everyone involved in editorial decisions and programme making is free from inappropriate outside commitments. It must also consider whether the position of families and close personal contacts present a likely conflict of interest.

13.1 Presenters and Reporters of the SBC

Those known to the public primarily as journalists and presenters must be seen to be impartial. They should have no outside interests or commitments which could damage the Corporation's reputation for fairness impartiality and integrity. Nothing they do, such as writing, speech making, giving interviews should lead to any doubt about their objectivity on air.

Journalists and presenters shall not express personal views on controversial issues off-air as this will compromise their on-air role.

It is important that in speaking or writing, including writing social media posts, they do not:

- state how they vote or express support for any political party.
- express views for or against any policy which is a matter of current political debate.
- advocate any particular position on a matter of current controversy.
- call for change in public policy.
- express views for or against any religion, groups or individuals

13.2 Commercial, Business and Financial Interests

It is essential that the SBC's integrity is not undermined by the commercial, business or financial interests of any programme makers, journalists or presenters. Such interests should never influence coverage of a subject matter, a choice of items or the ranking of the item in the news.

Programme makers (producers, journalists and presenters) must declare any interests which could be perceived as a conflict of interest. This include:

- any directorships, shareholding, or consultancy work for outside organisations, especially media-related companies.
- any significant shareholdings, loans (except mortgages) or financial interest which could constitute a conflict of interest.

13.3 Personal Benefits/ Gifts

The SBC's employees must not accept personal gifts or benefits for themselves or members of their family from organisations or persons with whom they might have dealings in their journalistic work. These include gifts, goods, discounts, services, cash, loans gratuities or entertainment outside the normal scope of business hospitality. Receiving such benefits could lead to a conflict of interest.

Anyone working on a financial story must on no account use information they have come across while covering a financial or business story to pursue personal financial reward for themselves or others.

13.4 On-Air Talent and Commercial Advertising

Increasingly advertisers and companies want to employ on-air talents to endorse their products.

On-air talents shall observe certain generally-agreed principles:

- No advertising campaign in which they appear should give the public reason to doubt the SBC's objectivity.
- The product they have endorsed must not be shown, featured, reviewed or discussed in their programmes.
- They shall not replicate their on-air role to endorse any product or services.
- They shall not use their appearances on radio or television to promote their personal endeavours, such as concerts.

Stricter rules are likely to apply to long-established presenters, news and current affairs journalists and presenters, than someone doing a few programmes or a one-off series. In such cases, approval must be sought from the Head of Section.

14. CRIME AND ANTI-SOCIAL ACTIVITIES

News items and programmes on crime must not glamorize crime or criminals or act as incitement to violence and other anti-social behaviours.

Scenes of violence or suffering, such as close ups of persons being brutally killed and tortured and visual descriptions of rape scenes, shall normally be avoided.

Gratuitous and graphic portrayals of violence shall not be shown.

Violent crime is usually a tiny proportion of total crimes committed, but it takes up a greater proportion of crime coverage. In handling crime stories, the Corporation will be alert to the possible cumulative effect of crime coverage.

When covering crime stories, the SBC will:

- give due care before identifying the deceased victim of a crime. This includes making sure that the relatives of the victim have been informed.
- not broadcast the names of victims of sexual assaults unless the victims give consent, or volunteer their story for broadcast.
 - Broadcasting the victim's identity often only adds to the person's grief, anguish and trauma.
- not stage its own reconstructions of crimes in order to report on a crime story.
 - The Corporation may feature coverage of police reconstructions for the purpose of gathering evidence.
- be sensitive to the impact that interviews with serious criminals who are active or being sought by the police would have on its audience.
 - These types of interviews are rarely justified.
- take particular care when interviewing witnesses to a particular crime, so that there is no interference with the course of justice.
 - **These types of interviews will not be considered at all once legal action has begun and a trial is under way.**

15. VIOLENCE

We live in a violent world. Violence is part of everyday life, but particular care must be taken in portraying it. Violence on screen upset many people, particularly children whom it has a unique potential to distress and disturb.

Decisions about whether and how to portray violence shall not be taken lightly. Content-makers shall bear in mind its possible effects, including whether it may stimulate aggressive or violent behaviour or induce indifference or insensitivity.

Violence shall not be presented in such a manner as to glamorize it. It is important that when violence is portrayed that, as a rule, its serious consequences are not glossed over. An excess of violence can desensitize viewers.

In the preparation and presentation of programmes, journalists and producers are required to exercise care and discretion when dealing with the issue of violence.

The Corporation must ensure that:

- any violence shown is not gratuitous and is justified by the context.
- scenes of rape or sexual violence are treated with the utmost care. Explicit details and prolonged focus on sexually violent contact shall be avoided.
- the combination of violence and sexuality in a way designed to titillate or glorify shall not be shown.
- when real or fictitious killings, including assassinations are shown, the coverage shall not be explicit or prolonged or repeated gratuitously.

15.1 Violence in News Programmes

News, current affairs and factual programmes will, by their nature, often contain violent, disturbing or alarming material.

A broadcaster's duty to inform includes communicating and analysing the facts about violent events. The Corporation shall not try to sanitize, by omission, a world in which much violence and brutality occurs.

When covering violence in the news, the following will be observed:

- The decision to broadcast certain pictures or sounds which portray violence will be based on their newsworthiness and reporting value, together with a proper regard for the susceptibilities of audiences to the detail of what is broadcast.
- Unnecessary close-ups of the dead will be avoided. Wide shots may be necessary to make a point. Editors must use judgment and discretion in deciding the amount of graphic detail to be shown.
- Scenes of suffering shall only be used when necessary to ensure an understanding of information important to the public.
- Where a particular news segment sequence is likely to disturb, distress or offend some of the audience, the SBC shall provide prior warning.
- Consideration will be given to the time of day when any violent sequences are shown.
 - Particular care shall be exercised in the editing of pictures for bulletins likely to be seen by vulnerable groups such as children.

15.2 Suicide

Suicide is a legitimate subject for news reporting.

Any portrayal of suicide requires a high degree of sensitivity and reports shall avoid glamorising the story. The SBC shall also avoid graphic or technical details of a suicide method or put out material which is likely to incite or encourage self-harm or suicidal behaviour.

16. DISORDER AND DEMONSTRATIONS

Protests and demonstrations and the right to conduct them are part of the democratic process. They take many forms, including marches, the occupation of buildings or other places, picket-lines, sit-ins, hunger-strikes and similar initiatives by individuals or groups.

Such public events are planned and conducted largely with media coverage in mind particularly protests and demonstrations. The potential for manipulation of coverage is often great.

In coverage of protests and demonstrations, the following guidelines are applicable:

- The decision to cover a demonstration shall not be communicated to anyone outside of the SBC
- Journalists must maintain their distance from organizers and demonstrators.
- Reporting teams shall be wary of persons or groups who are clearly putting on a performance for the cameras or microphones.
- Reporting teams must not make any suggestions or requests to demonstrators which could lead to staging of events.
- Journalists shall inquire into and report on the identity of the organizers, the aim of the demonstration and the approximate number of those taking part.
- When a planned public event is disturbed by a demonstration, the event itself shall still receive the coverage it merits.
- The decision to broadcast a report must be based on the importance of the event, protest or demonstration, rather than on the sounds and images it provides.
- While facts should not be distorted or suppressed, they shall be presented in a manner which should serve the public interest.
- While reporting disturbing situations, references or comments which may create panic and induce violent or emotional reactions among communities or individuals shall be avoided.
- Unconfirmed reports and hearsay in disturbing situations shall be ignored.

17. DISASTER COVERAGE

The aftermath of a tragic event calls for considerable sensitivity. Every effort must be made to ensure that nothing is broadcast on radio or television or posted on-line which might cause widespread offence.

In covering accidents, disaster and disturbances, journalists need to balance accurate reporting against the obligation to avoid causing unnecessary distress or anxiety. The emphasis must be on providing swiftly and accurately basic factual information such as times, locations, place of departure, destination, route, flight number (in the case of an airliner crash, for example). By doing so, needless suffering can be avoided.

Where forewarning can prevent widespread damage and reduce human misery and avert loss of life, the Corporation shall break into its scheduled programmes to give warning of an impending natural disaster. In serious situations, transmissions shall be kept open all day long and not restricted merely to the regular transmission hours.

Weather forecasts shall be taken only from the official meteorological service.

In the early stages of a disaster, it is especially important to give the source of information. If different sources give different casualty estimates, the SBC shall either report the range or quote the source which carries the greatest authority.

The SBC News and Programming shall follow some basic well-established principles:

- The dead shall be treated with respect and not shown unless there are compelling reasons for doing so.
- Close-ups of faces and serious injuries shall be used very sparingly.
- Concern for next-of-kin calls for special care in naming persons who have died or are missing. A person should not learn from a radio or television report that a relative has been killed. The SBC shall leave out names until sure that next of kin have been informed.
- Avoid using graphic material simply because it is available.
- In virtually no circumstances is it justified to show executions or other scenes in which people are being killed.
- Still photographs can sometimes convey the horrific reality without shocking to the same degree as moving pictures.
- To not put pressure on grieving relatives for interviews.

18. ELECTION COVERAGE

The media has a very important role in a democracy; the National Broadcaster even more so.

The SBC has a public service duty to contribute to free and fair elections in any way possible. Through reports, debates, live coverage on Radio and TV, the SBC can foster the democratic environment by telling the truth, by investigating the hidden, by explaining the background, by presenting the facts to inform and educate the electorate.

The aim of any election coverage is to ensure that the electorate is empowered to make an informed choice.

Election coverage is also the real test of a broadcaster's commitment to impartiality. It is during elections in particular that a station's commitment to objectivity, accuracy, fairness, impartiality and balance is scrutinised closely and evaluated assiduously.

During election time, the SBC will treat all political parties and candidates fairly and equitably by applying these principles:

- The public is entitled to hear the principal points of view of the various parties on all issues of importance. The right to hear alternative policies and points of view is inherent in the concepts of objective reporting and impartiality.
- The SBC shall provide credible, balanced and impartial accounts of issues so voters can make up their minds.
- When impartiality is not achieved because a political candidate has not been able or has refused to participate in a report, debate or programme, the SBC will inform the audience accordingly
- The SBC will not bow to pressure from individuals or organised pressure groups

18.1 Content Produced by the SBC

Content produced by the SBC during elections time will be subjected to the even more scrutiny than usual. They will reflect established journalistic principles of accuracy and objectivity and will offer viewers and listeners an intelligent and informed account of issues so that they can form their own views.

These contents can include news report, live or recorded debates, talk shows. In all of these contents, the journalist or producer must ensure that they talk to a broad range of voters.

Journalists can also talk to independent sources such as political analysts.

18.2 Party Political Broadcasts

Party Political Broadcasts (PPBs) are content that are not produced by the SBC but are broadcast by the SBC on behalf of political parties and independent candidates, in line with the Elections Act.

These programmes are considered as Personal Views Programmes and will normally reflect the point of view of the party or candidate with interviewees and other speakers promoting the cause and ideology of the party or candidate in question.

In such cases the SBC will:

- insert an appropriate disclaimer at the beginning and end of the programme to make clear that the views expressed in the programme are not the SBC's.
- vet the programme before broadcast to ensure that they meet the Corporation's editorial guidelines and that there are no statements that might give rise to legal actions against the Corporation
- keep out any statements that goes against the Corporation's editorial guidelines, if the party refuses to edit their programmes as per the SBC's recommendations
- offer a right of reply if unduly damaging and libellous statements are made against another candidate (or political party)

18.3 Coverage of incumbent candidates

In an election campaign there is a risk of incumbents trying to use their position to advance their re-election prospects.

Coverage of government business during elections periods shall be scrutinised to ensure that incumbents do not have unwarranted advantage over their opponents.

The SBC shall regard with caution any statement or action by an official of an incumbent party and will check whether, for example, public appearances of government officials are strictly on government business or part of their election campaign.

18.3 Privacy and Dignity

The SBC shall exercise exceptional care and consideration in reporting on matters involving the private lives and private concerns of individuals.

Notwithstanding, it should be understood that the right to privacy may be overridden by a legitimate public interest.

In the protection of privacy and dignity, special weight must be afforded to the privacy and dignity of children, the aged and the physically and mentally disabled.

18.4 Reporting of Elections results

The SBC has an obligation to inform the public of the election results, as and when they become available. Special care shall be taken to ensure the accuracy of all results.

19. PERSONAL VIEW PROGRAMMES

Some broadcasters have a long tradition of open access to the airwaves for a wide range of individuals to offer a personal view or advance a contentious argument.

As the SBC moves more and more in that direction, the following guidelines shall apply:

- Personal view-type programmes shall be signalled clearly in advance.
- Editors must ensure any such programmes do not seriously misrepresent opposing viewpoints.
- Regular presenters or reporters normally associated with news or public policy related programmes shall not present personal view programmes on controversial matters.

19.1 Vox Pops

‘Vox populi’ or ‘vox pop’ is the Latin term meaning *voice of the people*. In media, it is common to inquire about public opinion and people’s position vis-a-vis specific issues, including controversial issues.

These are not an indication of wider public opinion, but their value is that they allow different sides of an issue in question to be expressed through the voices of the man and woman in the street. It should be made clear that they are an expression of a point of view, not an indication of the weight of opinion on either side.

Great care is needed with political questions and the various voice clips shall be assembled in such a way as to ensure both sides of an issue are covered.

Statements gathered from individuals chosen at random shall be presented solely to illustrate the range and texture of popular opinion on a topical issue. There shall not be any suggestion, explicit or implicit, that the views broadcast in such a survey reflect wider public opinion.

19.2 Phone-ins

Using the telephone can enhance programmes by allowing the public to give their own point of view or to interact directly with programmes. Phone-in programmes are an accepted and important means of broadcasting individual points of view and of allowing the listeners and viewers to question politicians and other public figures. Programmes can use phone-ins to provide individual contributions or to get an immediate response from members of the public.

Since phone-ins are generally live, they shall be treated with caution.

- Producers must be constantly on the alert to the possibility of callers breaking the law by making outspoken remarks, wild unsubstantiated allegations or causing widespread offence in matters of taste or decency.
- To minimise the risks, producers shall screen potential callers before allowing them to be put on air.
- Producers shall also ensure that the phone-in does not become a focus or platform for organized pressure groups or irresponsible individuals.
- Presenter/moderator shall take special care to maintain fairness, impartiality and balance by ensuring that a wide range of views is broadcast.
- Presenter/moderator must be able to extricate the programme where difficult situations arise, cutting short a caller politely and firmly.

20. RELIGIOUS PROGRAMMES

The Seychelles is religiously diverse. As such, religious programming shall, as far as practicable, reflect the mix of faiths in the country.

The SBC will not support any one religion over another nor provide a medium for one religion to denigrate another.

- References to religion shall be presented accurately and in a dignified manner.
- Programmes that denigrate or satirize any racial or religious group will not be broadcast.
- Programmes that feature the views or beliefs of any race or religion must be acceptable to the target audience and shall not be converting or agitating in nature.

Programme makers dealing with religious themes should be aware of what may cause offence. What may be unexceptional to some may provoke strong feelings elsewhere.

Deep offence can be caused by:

- Profane references or disrespect, whether verbal or visual, directed at deities, scriptures, holy days and rituals which are at the heart of various religions
- Casual use of names considered holy by believers in expletives e.g. the use of “Jesus”, “Christ” or “God” or of names held holy by other faiths. The use of such expletives in drama or light entertainment causes distress far beyond their dramatic or humorous value.

Programmes, which contain profane expressions or other references to religion, which could cause deep offence, shall not be broadcast before the watershed. The SBC shall give warnings of contents which could cause offence to an audience. Content-makers shall seek clarification from concerned religious group if uncertain whether a theme/topic may cause offence.

People and countries shall not be defined by their religions unless it is strictly relevant.

Particular religious groups or factions shall not be portrayed as speaking for their faith as a whole. For example, footage of chanting crowds of Islamic activists shall not be used to illustrate the whole Muslim world.

21. HEALTH PROGRAMMES

Health programmes are not current affairs programmes. Most health programmes will be aimed at the ordinary person. Health coverage shall be undertaken with advice from the relevant medical authorities. The perspective will be that of the patient.

Public media is particularly effective in reaching the vast majority of the public and getting across important information on basic matters. These audiences can be reached via programmes using a variety of formats: reports, packages, discussions, interviews.

Programmes and health campaigns shall be run in cooperation with appropriate bodies such as the Ministry of Health, specialist medical organizations and NGOs working in the health field.

Programmes and campaigns producers shall:

- check all medical facts with doctors and authoritative medical journals specialising in the particular field.
- make special efforts to ensure the accuracy of their information.
- make sure their programmes are not used as vehicles for disinformation.
- consider running campaigns across all types of programming, for maximum effect, rather than just specialist information slots.
- work in partnership with reputable organisations for community buy-in.
- know who their audience is and are clear what they want to achieve.
- dispel ignorance with programmes that simply set out the facts.
- use doctors and experts as advisors regularly.
- maintain a sense of proportion. It is important to tell the facts without exaggeration and to avoid value judgements

22. BUSINESS PROGRAMMES

Financial and business issues are increasingly receiving greater coverage in SBC programmes.

Apart from obvious news, such as details of the budget and taxation changes, a journalist will use his/her judgement on which statistics are worth reporting and how to interpret data. It is all very well to report that a company has achieved record profits (or incurred massive losses), that a country's imports are up (or down). The viewer will want to know why and what is the significance and the likely repercussions.

Financial news reports must be seen to be impartial. Journalists shall not be partisan on an issue that divides the public. It is one thing to criticise the national football team, another to criticise economic policy.

In their analysis journalists shall give due weight to the body of expert opinion on the subject, remembering that when selecting an outside expert to comment, that expert is seen as impartial. It shall be clear in any report that an outside expert is giving a fact, an impression, an obvious interpretation or a personal hypothesis. Viewers and listeners should not draw conclusions from a report that, for example, it is a good idea to buy/sell a particular product or service.

22.1 Products and Services in Programmes

References within the news to particular commercial products or services shall be included only where they can be justified editorially. The SBC must not give the impression that it is promoting or endorsing particular products, services or companies through undue prominence in the news. There must be no element of "plugging".

It is appropriate to mention a brand name if a particular product is the reason for a company's success or failure and would help the audience understand the context of the news better.

In factual programming, the usual justification for mention of a brand or product is where a story of general interest or importance to audiences would be meaningless or significantly less informative without reference to it.

In non-factual programmes such as drama or light entertainment, references (including visual references) to specific products or commercial organisations will usually be appropriate only to add authenticity.

The SBC, as a public service broadcaster shall:

- avoid giving undue prominence to particular products or services.
- not accept payment for news reports about a business or service

23. CITIZEN JOURNALISM

We are in an era of instantaneous news and fast developing technology, especially with mobile (cell) phones which are also cameras. The result has been the rapid growth of what has come to be known as “Citizen Journalism; persons who happen to be on the scene of a big news story, taking pictures on their mobile phones and commenting accordingly.

Over a short period of time, ‘user-generated content’ has become a major feature in the coverage of top news events. It is a powerful new way of reporting; telling the story more graphically than any reporter arriving on the scene some time later and quite unlike anything a conventional camera crew could have taken. Citizens are now playing an active role in the process of collecting, reporting and spreading breaking news and information.

User-generated content raises particular challenges. As a starting point, the SBC shall not assume that the submitted material is accurate. Individuals who send in such material are not necessarily trained writers or fact checkers.

The SBC must therefore apply the same approach as to any other material it handles from its journalists.

Depending on how the user-generated content is to be used, the SBC shall take reasonable steps to seek verification.

Editorial standards will apply as much to this kind of source material as to that gathered by the SBC own staff.

Particular scrutiny will be undertaken on materials supplied by anyone or group with vested interest in the story rather than a disinterested bystander.

Before using the User Generated Content, content-makers shall ask themselves these questions:

- Does the material submitted show a person in great distress?
- Does it show a clearly identifiable person receiving medical treatment?
- Does it feature activity which appears to be criminal or seriously anti-social?
- Where has the material been taken – in a public place such as a shopping centre, or in a doorway?
- Does it show clearly identifiable children?
- Are there copyright issues with pictures received?
- Was anyone’s privacy infringed when the pictures were taken?

When dealing with User Generated Content, the SBC will:

- Provide clear instructions on how members of the public can submit material – the e-mail address, text messaging number, and address for sending picture messages from mobile phones.
- Encourage these types of content with due care so that the public does not take unnecessary risks trying to take photographs, film or conduct interviews e.g. a person filming a big fire could be potentially risking their lives by getting too close to a blaze or a collapsed building etc. And they shall not breach police or emergency services lines, or trespass on private property. If it is suspected they have done so, they shall be told their material will not be used.
- Vet all materials sent in by the public to ensure that it is in line with ethical and editorial standards.
- Be on the lookout for possible photo manipulation and hoaxing.
- Exercise special care when handling pictures of incidents where many people could have died.
- Use caution when dealing with people who witness horrific events bearing in mind that they are often very confused and frightened. They think they saw something, but often it turns out they got it wrong.
- Ensure that material from the public including lobby groups is clearly identified as such so that the audience knows it has not come from the Corporation or another news organisation.
- Use its own judgement to decide whether further consents may be needed in order to publish User Generated Content.
- Many of the images sent in will not come with any form of consent, particularly if taken as dramatic events unfold.
- Respect the right to privacy, particularly where children or vulnerable adults are involved.

24. INTERNET AND SOCIAL NETWORKING PLATFORMS

The internet and social media sites are no more reliable than any other similar source elsewhere. They still need checking.

The SBC's content-makers need to be rigorous about the origins of material derived from the internet. They need to scrutinize and if necessary, corroborate eye-witness accounts submitted, before using them, by talking to others.

Any contributor found via internet shall be checked and double checked.

Content-makers shall talk to them before putting them on air to make sure they are who they say they are.

25. EDITORIAL CONTROL AND RESPONSIBILITIES

Day-to-day Editorial decision-making within the SBC is a functional responsibility of the respective output Heads. For example, the Head of News and the Chief Editor are designated with editorial responsibility as part of their functional roles within news production and reporting.

Similarly, the Head of TV Programmes and Head of Radio Programmes, are the Chief Editors of their respective outputs.

Referral for decisions and advice are escalated to the Deputy Chief Executive Officer in the first instance.

All journalists, producers and other SBC staff involved in creating, acquiring, commissioning and scheduling content are responsible to ensure that content complies with the Editorial Guidelines and are also expected to refer any editorial matter upwards, via their line management, when in doubt.

For news, upward referral is normally made to the Chief Editor, the Head of News and the Deputy Chief Executive Officer, in that order.

The Editorial Committee, chaired by the Deputy Chief Executive Officer, is the internal forum to discuss and decide on Editorial issues.

In addition, Editorial Committee members can also be consulted for advice and guidance.

Editorial issues shall, whenever necessary, also be referred to the Chief Executive Officer for input and advice. Referrals to the Chief Executive Officer shall be balanced with his role as a regulator of editorial decisions and as an adjudicator in relations to complaints.

26. COMPLAINTS

The Corporation is legally and morally responsible for the quality and standards of all the content it broadcasts. This includes programmes produced by its own staff, co-productions, live content and acquired materials including foreign contents.

Listening to and responding to complaints, and taking actions when warranted, are important for both accountability and continuous quality improvements.

It is important that the public are able to express their opinions on any of the SBC's content. As the national broadcaster, the SBC must be accountable to its viewers and listeners and consequently has to monitor and respond to public concerns, whether they are expressed in the form of letters, phone calls or e-mails or are raised by newspapers or other media, or through informal means.

Where warranted, the SBC will endeavour to resolve complaints fairly, quickly and satisfactorily.

When the SBC is at fault, it will say so and take actions to correct it, as far as practicable.

26.1 Complaints Procedures

The SBC shall ensure that complaints receive a prompt reply, even if initially it is simply an acknowledgment while the complaint is investigated.

In the first instance, the SBC will consider whether the complaint is reasonable. Complaints that are judged not reasonable will be rejected courteously.

If a complaint is received while a programme is still live on air, a correction may be made during or immediately after the programme. This is a decision which will be up to the most senior editorial person present.

Many individuals prefer the immediacy and informality of making a complaint by telephone. Telephone complaints will generally be handled directly by the content area concerned. Every effort shall be made to resolve telephone complaints during the initial call, or to arrange an appropriate person to call back.

In some circumstances, especially when the matter is serious or complex, callers will be asked to put their complaint in writing. Written complaints will also apply for instances where a caller becomes abusive. If the caller has problems in writing (language, literacy, or disability) alternative arrangements will need to be made to obtain a written record of the complaint.

All complaints will be assessed according to:

- the seriousness of the matter
- the likelihood of harm
- the scale of audience response
- the degree of risk of damage to public trust and confidence in the SBC

Serious complaints may include, but not limited to:

- A claim of unjust or unfair treatment in a programme.
- Unwarranted infringement of privacy over the way material in a programme was obtained.
- The portrayal of violence or sexual behaviour or use of foul language in a programme.
- Other matters of taste and decency.

When there is threat of legal actions, the SBC's lawyer(s) will be consulted.

Formal Complaints can be lodged by writing to the Chief Executive Officer, or emailing complaints@sbc.sc or via the Corporation website's *Contact Us* page: <https://sbc.sc/contact/>

Once a complaint has been lodged, the Quality Control Unit will be asked to investigate and will refer the complaint to the Output Section which produced the content for a written response.

Complaints received shall be dealt with in accordance with the SBC's internal procedure for Complaints: ***SBCPOL-04-Complaints Procedure***

26.2. Appeals

The SBC Board is the first instance of appeal against any decision or response given by the SBC's management regarding a complaint.

When the complainant is not satisfied with the SBC's response, section 22(1) of the SBC Act makes provision for the Seychelles Media Commission to consider complaints against the SBC.

These include complaints where a person is alleging that a certain broadcast is not in accordance with the Editorial Guidelines of the Corporation or claiming unfair or unjust treatment by a programme broadcast by the SBC.

In such cases, the Seychelles Media Commission may launch its own investigation into these complaints or appeals.

Additional Documents

- Procedure for Complaints available on the SBC website: **SBCPOL-04-Complaints Procedure**
- Safeguarding the Privacy of Children in the Media: <https://family-affairs.csinnovative.com/wp-content/uploads/2018/02/Safeguarding-Children-in-the-Media-2017.pdf>