

# Stonewall Response – Holding the BBC to account for the delivery of its mission and public purposes

## Introduction

1. Stonewall welcomes the opportunity to respond to Ofcom's consultation into holding the BBC to account for the delivery of its mission and public purposes.
2. Established in 1989, Stonewall is a national lesbian, gay, bisexual and trans (LGBT) equality charity. We have conducted research and worked with producers and broadcasters, including the BBC, to promote the fair, accurate and diverse portrayal of LGBT people in the media.
3. Public broadcasters are in a unique position to inform and increase the British public's understanding on a broad range of issues, and it is therefore vital that broadcasters represent the full diversity of the British public, and that this representation is fair, accurate and authentic.
4. As a publicly funded broadcaster with a wide-range of services and channels, we believe the BBC absolutely has a duty to ensure it reflects all of society. We are therefore extremely pleased that diversity has now been included in the BBC's public purpose and that Ofcom is committed to holding it to account on the delivery of this purpose.
5. Stonewall is also pleased to be invited to respond to this consultation to ensure fair representation and portrayal of the LGBT community. We are also pleased to see that the BBC has for the first time committed to increasing LGBT representation in its workforce and created a target of eight per cent by 2020. We are pleased to see that the BBC is also committed to a target of eight per cent of LGBT people on screen, with some lead roles, by 2020.

## Question 5 – Do you agree with the approach we have proposes for public purpose 4, including the high-level objectives and regulatory conditions we are proposing?

6. 4.128 We are pleased to see a mix of high-level objectives and to see that this goes above and beyond the targets that the BBC has set itself. We have the following specific recommendations:
7. 4.128.4 We welcome that sexual orientation and gender reassignment – which we understand to mean representation of trans people and trans communities – are included in the identities that Ofcom will be considering as part of the BBC's performance diverse representation. We would suggest an alteration of language to accurately reflect all trans identities and suggest for future reference Ofcom uses gender identity, to ensure all trans identities, including non-binary identities are represented.

8. **Stonewall recommendation:** Update in Ofcom language to ensure all trans identities are represented.
9. 4.128.3 We're pleased to see that Ofcom, as part of its high-level objectives, will be looking at the accurate and authentic portrayal and representation of diverse communities.
10. As part of this assessment, we would encourage Ofcom to consider how fair and accurate the BBC represents and portrays each identity in the LGBT community. The LGBT acronym represents many different identities, all with their own unique experiences, and we would strongly recommend not using this as a catchall.
11. We would also encourage Ofcom – and the BBC – to consider the multiplicity of identities that an individual might have. This includes, looking at 'intersections' across different minority groups e.g. people of faith, race, ability, age and rural versus urban communities. LGBT people of course exist across all of these different groups, each with their own unique experiences, issues and concerns that deserve fair and accurate representation. We strongly encourage a diverse portrayal of different LGBT experiences.
12. **Stonewall recommendation:** We encourage Ofcom to consider how well the BBC is reflecting the full diversity of the LGBT community, and the diversity that exists within that community.
13. 4.128.4 We are pleased to see that as well as reflecting society, that there is a specific expectation that the BBC will contribute to social wellbeing through cultural education and the bringing together of people for shared experiences. For this reason, we would again reiterate the importance of tackling diversity in its multiplicities and to consider intersectional representation, rather than separate – and therefore divided – diversity.
14. **Stonewall recommendation:** We encourage Ofcom to consider how well the BBC is reflecting, and creating cohesion between, different identities and examining the intersections of identities.
15. 4.129 We are pleased to see a mix of measures, both qualitative and quantitative, to ensure the BBC is meeting its diversity targets. We would encourage Ofcom to take into account the following considerations:
16. 4.129.2 and 4.132 We're pleased audiences are to be consulted on how they feel different communities are represented. We also welcome that Ofcom is proposing to seek views from different communities on how the BBC is meeting their needs and reflecting their lives. As with portrayal and representation, we would encourage both the BBC and Ofcom to ensure that all identities within the LGBT community are part of this process. We would also strongly encourage Ofcom and the BBC, when consulting on a piece of content, to seek out people who identify with

the identity a character or storyline is representing. For example, to consult with trans people on trans portrayal, and bi people on bi portrayal. We would also strongly encourage Ofcom and the BBC to invite representation from trans or bi specific groups, to ensure that portrayals are not only accurate and authentic for an individual, but for that community as a whole.

17. **Stonewall recommendation:** Consulted audiences to reflect all identities within the LGBT community and specific expertise sought from groups representing these identities, where appropriate.
  
18. 4.134 While we appreciate that Ofcom's remit of regulation is focused on on-screen and on-air output, we would strongly encourage consideration of off-screen diversity when holding the BBC to account. Portrayal and representation that is fair, accurate and authentic is much more likely to come from an offscreen workforce that is as diverse as the communities it is duty bound to represent. We would also encourage both Ofcom and the BBC to look at diversity across the broad workforce but to consider areas of the business where diversity is poor and how and what impact this could have for on-screen representation and portrayal.
  
19. **Stonewall recommendation:** Consideration of off-screen diversity and to review inclusion as part of Ofcom's ongoing regulation of the BBC's performance on public purposes.

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