

## **Response from the Advisory Committee for Scotland (ACS) to Ofcom's Thematic Review: 'Representation and portrayal on the BBC'**

*'The Advisory Committee for Scotland advises Ofcom about the interests and opinions, in relation to communications matters, of persons living in Scotland.'*<sup>1</sup>

This response from the ACS to Ofcom's *Thematic Review of Representation and Portrayal on the BBC* draws on the knowledge and expertise of ACS members, and is informed by our individual experience and through discussion at our meetings. It does not represent the views of Ofcom or its staff.

The ACS welcome this thematic review as the representation and portrayal of Scotland is a subject which we have debated at length.

We are keen to stress that although a more accurate representation and portrayal is required, we do not want this to extend to a stereotypical portrayal of Scots or Scotland; however a more authentic representation of Scottish culture is welcomed.

### **Framing the problem**

In the invitation to respond, Ofcom states:

*'All audiences should feel that the BBC offers something for them, but our research shows that several groups feel that it doesn't adequately represent their interests or lives. We are conducting this thematic review of representation and portrayal to understand in greater detail what audiences expect from the BBC, and whether the BBC reflects and portrays the lives of all people across the whole of the UK. Looking at representation and portrayal in detail now will provide a baseline to inform whether further measures are needed to ensure that the BBC is delivering for all audiences.'*<sup>2</sup>

However, the terms of reference focus very much on Public Purpose 4 (excluding Public Purpose 1 and 2 which are also relevant) and the creative economy. These are undoubtedly important, but it is noticeable that perceptions of the BBC's current performance on reflecting the regions and nations are much more negative in the devolved nations, and particularly in Scotland<sup>3</sup>. The ACS considers that this gap is due largely to broader concerns around differences between Scotland and the rest of the UK not being reflected in editorial decisions in, for example, news, current affairs and children's programming rather than in the diversity of groups appearing in creative content.

The first step is data analysis to confirm or dispel whether this perception is accurate. If it is, then a survey which only looks at whether Scots feel that specific drama programmes represent their community, and then attempts to redress any issues found will not resolve concerns like these, and so will not change the gap in the statistics for Scotland.

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<sup>1</sup> <http://www.ofcom.org.uk/about/how-ofcom-is-run/committees/scotland/>

<sup>2</sup> [https://www.ofcom.org.uk/consultations-and-statements/category-3/bbc-thematic-review-representation-portrayal?utm\\_source=updates&utm\\_medium=email&utm\\_campaign=consultations-bulletin](https://www.ofcom.org.uk/consultations-and-statements/category-3/bbc-thematic-review-representation-portrayal?utm_source=updates&utm_medium=email&utm_campaign=consultations-bulletin)

<sup>3</sup> In its deliberative audience research for the Public Interest Test into the proposed introduction of a new BBC Scotland TV channel, the BBC received an average rating of 4 out of 10 from participants for its current performance in reflecting and serving the diverse communities of the nations and regions.

[http://downloads.bbc.co.uk/aboutthebbc/insidethebbc/howwework/accountability/consultations/deliberative\\_audience\\_research\\_bbc\\_scotland\\_papa.pdf](http://downloads.bbc.co.uk/aboutthebbc/insidethebbc/howwework/accountability/consultations/deliberative_audience_research_bbc_scotland_papa.pdf)

The ACS would like to see quantitative and qualitative research which explores this gap in the devolved nations, and in particular in Scotland, and looks at the root cause for the more negative view of the BBC's ability to:

*'accurately and authentically represent and portray the lives of people across the UK and raise awareness of the different cultures and alternative viewpoints that make up its society ... ensure that it provides output and services that meet the needs of the UK's nations, regions and communities ... bring people together for shared experiences and help contribute to the social cohesion and wellbeing of the UK.'*<sup>4</sup>

Here are a couple of specific examples impacting current engagement in Scotland:

- The terms of reference refer to younger audiences being particularly negative about the BBC in terms of representation and portrayal. In Scotland, children are offered BBC holiday programming which starts three weeks after they break up for the summer and continues for three weeks after they go back to school. As they get older, they are offered support on networked services on 'what to do if you haven't got the grades you expected' the day exam results come out in England and Wales, with no acknowledgement of the fact that Scottish exam results came out 10 days before. It is hardly surprising that as young adults they feel that the BBC does not reflect their lives.
- The Scottish independence referendum marked a low point in Scottish confidence in the BBC, with Scots on both sides of the debate feeling that the BBC did not represent the complexity of the situation accurately to the rest of the UK<sup>5</sup>. This feeling that the BBC is unaware of how Scotland differs from the rest of the UK continues to be exacerbated by the use of 'UK', to mean 'England and Wales', 'NHS' to mean 'NHS England' and so on in news and current affairs programmes. It is also evident through networked coverage of the current Brexit negotiations where there is little differentiation made around the potential impact of the withdrawal bill on the devolved nations, and in particular Scotland where the majority population voted to remain.

Further quantitative research is required however to ensure the root cause of the gap in perception of the BBC in Scotland is understood so it can be tackled effectively.

It is important to note that Public Purpose 4 also states:

*'In commissioning and delivering output, the BBC should invest in the creative economies of each of the Nations and contribute to their development.'*<sup>6</sup>

This is relevant to consider here because this thematic review is about representation both in front of and behind the camera with the latter making decisions on editorial approach and content.

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<sup>4</sup> [https://www.ofcom.org.uk/\\_\\_data/assets/pdf\\_file/0011/111602/bbc-thematic-review-representation-portrayal.pdf](https://www.ofcom.org.uk/__data/assets/pdf_file/0011/111602/bbc-thematic-review-representation-portrayal.pdf)

<sup>5</sup> Following the Scottish Independence Referendum, the BBC's Audience Council for Scotland recommended that the BBC should review its approach to the coverage of controversial political issues "to ensure that perceptions of impartiality remain strong across all audiences". Referred to in its Scotland Annual Review 2015-16.

[http://www.bbc.co.uk/bbctrust/who\\_we\\_are/audience\\_councils/scotland/annual\\_review](http://www.bbc.co.uk/bbctrust/who_we_are/audience_councils/scotland/annual_review)

The Audience Council also concluded that the BBC "should move urgently to ensure that audiences in Scotland get news from all BBC outlets which is accurately labelled as to its relevance to Scotland".

<sup>6</sup> Royal Charter for the continuance of the British Broadcasting Corporation, Section 6 (4)

## Quotas and Diversity

The ACS welcomes the increased quotas placed on the PSBs, including the BBC, in terms of Out of London production, the results of which are very gradually reflecting an increased diversity in representation and portrayal. However, the dominance of London and the South East is still a major factor, with content being commissioned from BBC Studios and other production companies who are based in the South East of England and therefore their casting is all too often South East centric; 'British' is all too often seen as 'English'.

We again reiterate the point made in our response to the recent diversity and inclusion consultation which is also relevant here. By simply targeting diversity statistics as a percentage of the UK population as a whole, there is an inherent imbalance towards representation of England (10 times the size of any of the other nations), rather than all of the 4 UK Nations:

CHARACTERISTIC	ON-SCREEN	SCOTLAND POPLN	UK POPULATION
AGE (50+)	24.2%	38% <sup>7</sup>	36%
BAME	21.5%	4% <sup>8</sup>	13%
DISABILITY	6.5%	20% <sup>9</sup>	18%
LGBT	13.2%	1.8% <sup>10</sup>	6.4%

More accurate representation and portrayal however must not be artificially created for Scotland. For example, it is as important that those in England are aware that Scotland has a relatively small BAME population, as it is that those in Scotland are aware that England has a much larger one. It should also be noted that Scottish cities have a much more diverse population and so this should be reflected in programming; the way in which casting is conducted has a major role to play in this.

Content and casting can portray stereotypes of what it is to be Scottish. For example, *Still Game* is hugely popular both North and South of the border, but it does portray a stereotype that Glasgow is an impoverished working class community where the main form of entertainment is drinking. Whilst being very funny, it needs to be balanced with other programmes which reveal very different Scottish communities to the rest of the UK.

When researching stories for a series with different locations, researchers should be required to include stories from diverse parts of the UK. An excellent example of this was the recent Channel 4 series *Coastal Railways* which had four episodes, one from Scotland, one from Wales, one from North East England and one from South West England. Another good example is Channel 4's *Britain at Low Tide*, the current series of which has featured East Sussex, Dorset, Scotland, The Severn and East Yorkshire. Channel 4 appears much more successful at portrayal and representation than the BBC and so some further insight from Channel 4 would be useful.

Currently some programming commissioned by BBC Scotland is only broadcast in Scotland. There is an opportunity here to broadcast across the UK which would positively contribute to enhanced representation and portrayal of Scotland; likewise this may be true of programming in the other nations.

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<sup>7</sup> <https://www.nrscotland.gov.uk/statistics-and-data/statistics/statistics-by-theme/population/population-estimates/mid-year-population-estimates/mid-2016>

<sup>8</sup> <http://www.gov.scot/Topics/People/Equality/Equalities/PopulationMigration>

<sup>9</sup> <http://www.gov.scot/Topics/People/Equality/Equalities/PopulationMigration>

<sup>10</sup> <http://www.gov.scot/Topics/People/Equality/Equalities/DataGrid/SexualOrientation>

BBC Scotland can itself be too predictable in terms of portrayal for example based on the location of its news vox pops and the nature of characters in non-news programmes. The new proposed digital channel is an opportunity for BBC Scotland to reflect Scotland to itself and to question whether BBC Scotland is serving all Scottish communities well. There is significant room for improvement, with new programming ideas required to redress the balance. There should be diversity across all genres on the proposed new channel.

There is a concern that this thematic review does not specifically cover the news, and so the ACS encourages that this be included as a specific topic for consideration either as part of this review or a separate subsequent consultation.

### **Young people and PSB**

The lack of engagement from young people is particularly interesting and so Ofcom should consider how it engages this audience as part of the review. Holding open consultation sessions in schools, or with communications and media students at universities would be extremely insightful as well as specifically using social media to target the younger generation to gain feedback.

This lack of engagement is not specific to Scotland, and the ACS is not aware of any figures looking at differences between the views of specifically young people in each of the nations, so our comments here, while acutely relevant to Scotland, are also relevant to the rest of the UK.

Youth audiences are falling at a greater rate than any other age group on PSB channels, including the BBC. While much of this loss is put down to a natural migration to online channels such as YouTube, Netflix and Amazon, the BBC saw a drop of almost 20% in younger viewers to its TV channels in the months after it moved BBC3 online<sup>11</sup>.

According to Ofcom's recent paper *PSB in the Digital Age*, the latest Brand awareness of 12 to 15 year olds who go online is only 52% for BBC3, versus 87% for Netflix and 94% for YouTube. The budget for BBC3 was cut from £85m to £25m when it moved online, and so with this reduction in investment it comes as no surprise that the younger generation views the BBC less favourably<sup>12</sup>.

To address this however, as part of this consultation, Ofcom should not only consider how the BBC engages with younger people but also its recommendations specific to targeting a younger audience to gain feedback on an ongoing basis; this could include a continuing engagement campaign through social media and online.

### **The Advisory Committee for Scotland March 2018**

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<sup>11</sup> Source: Thinkbox, TV Marketing Body

<sup>12</sup> Ofcom's terms of reference for this consultation referred in paragraph 1.9 to its research showing that some younger participants were more likely to view the BBC less favourably - [https://www.ofcom.org.uk/\\_\\_data/assets/pdf\\_file/0011/111602/bbc-thematic-review-representation-portrayal.pdf](https://www.ofcom.org.uk/__data/assets/pdf_file/0011/111602/bbc-thematic-review-representation-portrayal.pdf)