

Ofcom Advisory Committee for Wales

Consultation Response: Terms of Reference, Ofcom's Thematic Review of Representation and Portrayal on the BBC.

The Ofcom Advisory Committee for Wales (ACW) welcomes this opportunity to comment on the proposed terms of reference for Ofcom's Thematic Review of Representation and Portrayal on the BBC. Public Purpose 4 states that the BBC must 'reflect, represent and serve the diverse communities of all of the UK's nations and regions, and in doing so, support the creative economy across the UK'¹. The Charter also requires the BBC to reflect the diversity of the UK, both in its output and services, by accurately and authentically representing and portraying the lives of people across the UK.

We note that the Review will primarily be focussed on the BBC's television services. We also acknowledge that the areas of study for this review could be complex and cross-cutting. In considering Public Purpose 4, we have therefore focussed our interest on the representation and portrayal of people living in Wales, both in terms of the BBC's services for viewers in Wales and also its UK television networks. Section 1.11 of the terms of reference document acknowledges the importance of ensuring that the BBC represents the different nations of the UK and the ACW welcomes Ofcom's intention to conduct research to inform this aspect of the Review.

The ACW felt strongly that it is important to distinguish between portrayal and representation of life in Wales on the BBC's services for Wales and considering the same issues in relation to the BBC's network television services and in our view this distinction should underpin the Review's research methodology. For example, we are particularly concerned with the provision of news and current affairs programming about Wales both on the BBC's services for Wales and its UK-wide services. In addition we believe there is a need, within the BBC's non-news programmes, to ensure that there is authentic portrayal and representation of the lives of people living in Wales, particularly in its drama output. In this context, we consider that an important element in addressing this issue, is the need to examine the current commissioning culture within the BBC.

News and Current Affairs

The issue of how news about Wales is reported, both to viewers within Wales as well as across the rest of the UK, is particularly important in the context of devolution. The creation of devolved governments and legislatures in Wales, along with Scotland and Northern Ireland, has resulted in diverging legislation and administration across major areas of government policy in these nations compared to England, covering such areas as economic development, education and health. For example there are, in effect, four NHS services operating across the UK, yet, particularly on network news, reporters and editors at a UK-level tend to report the activities of the UK government in relation to England and English politics as though they apply to audiences in all parts of the UK when in fact they do not.

When these reporters refer to "the government" or "the health minister", to *which* government and to *which* health minister are they referring? When they report on education policy, or economic development to *which* nation's education policy and to *which* economy are they referring? In the years immediately following devolution, the distinction between devolved and retained

¹ <http://www.bbc.co.uk/corporate2/insidethebbc/whoweare/publicpurposes>

competencies were fresh in the minds of newsroom staff; guidelines had been issued and there was a collective sensitivity to commit proper reporting. However, around a decade later, the King report², commissioned by the BBC Trust, published in 2008, concluded that there were,

“shortcomings in the BBC’s coverage of the whole UK. It suggests that the BBC is missing opportunities to reflect more consistently the reality of devolution, and that it needs to go further in reporting the changing UK with the range that audiences are entitled to expect. It also sets out concerns about the precision and clarity of reporting.”

The report kick-started distinct improvements in the reporting of news and current affairs across the UK within the BBC and based on content research carried out by Cardiff University, this enabled the Trust in 2010 to report that,

“there has been a real improvement in many areas and that BBC network news now does very much better than other broadcasters in reporting the devolved UK.”³

However, perhaps following staff turnover, there now appears to be a collective amnesia that devolution has occurred in the majority of UK nations. In the absence of reporting at an England-level, UK based services that address *all* UK electors report England-*only* politics with insufficient differentiation. Even the simple differentiating phrase “in England” is used inconsistently and as a ‘de-minimis’ phrase it seems hardly sufficient to explain why the situation in the other nations is not reported.

Also reporters appear to miss the opportunity to make relevant policy comparisons, reflecting how legislation and practice differ across the UK. These ‘sins of omission’ may appear pedantic, but they can have serious consequences, leaving room to fear that electors in the majority of UK nations are potentially being misled daily and provided with incorrect information to use as the basis for their voting decisions. Television news continues to have significant reach and impact and despite access to on-line content, the 2017 Communications Market Report (CMR) for Wales notes that Television is still the main source of news for more than six in ten adults in Wales⁴. Interestingly, although now somewhat out of date, research conducted on viewing in Wales’ border areas for the 2007 CMR noted a direct correlation between television coverage and voting intentions⁵.

Other Programmes

Non-news programming is also of particular importance in terms of the way people in Wales are represented and portrayed on-screen and we welcome the emphasis on the need to ensure that such portrayal is authentic (as noted in 1.1 of the draft Terms of Reference document).

Section 1.7 of the document states that, ‘the people we see on television should be broadly reflective of those who are watching it’ adding that Ofcom research suggests that this isn’t always the case. Section 1.8 also notes that Ofcom’s 2017 distinctiveness research found that some people felt that the BBC often has a London-focused perspective.

² http://downloads.bbc.co.uk/bbctrust/assets/files/pdf/review_report_research/impartiality/uk_nations_impartiality.pdf

³ http://downloads.bbc.co.uk/bbctrust/assets/files/pdf/review_report_research/impartiality/2010/nations_impartiality.pdf

⁴ Ofcom Communications Market Report for Wales, 3 August 2017, p 30

⁵ Ofcom Communications Market Report for Wales, 2007, p35, “England-only viewers were less likely to say they vote in Assembly elections”.

BBC Network drama's portrayal of the lives of people in Wales is a case in point. The recently broadcast series, *Requiem*, was nominally based in the north Wales town of Dolgellau, but the main roles were played by English actors and the story line owed very little to the drama's geographic location or to its largely Welsh speaking local culture. Similarly the second series of *Ordinary Lies*, broadcast on BBC network in 2016, was based in a call-centre near Newport in south east Wales. But the main plot lines were not informed by some of the key features and characteristics of life in the city, such as its significant ethnic minority population. The portrayal of the area was entirely incidental, creating a feeling that the drama could have been based anywhere in the UK.

A Report commissioned by the BBC Trust and Audience Council for Wales, '*Screening the Nation: Landmark Television in Wales*', published in March 2010, examined the representation of Wales in landmark BBC television drama made in Wales. The report drew on interviews with audiences and textual analysis of popular shows like *Dr Who* and *Torchwood*, to shed light on the complex relationship between television production, its locations, and the impact of local, regional and national identity. In its findings it noted that audiences recognise the importance of a sustained commitment by the BBC to the nations and regions. The Report recommended that the BBC should commit to the telling of powerful stories that reflect the unique nature of nations and regions, told with respect for the diversity contained within them⁶.

Commissioning and Organizational Culture

Sections 1.15 and 1.16 acknowledge the need to better understand the BBC's organizational culture, as well as the commissioning and production processes within the Corporation. The BBC's drama commissioners are almost all London based and re-locating such staff elsewhere in the UK could counter balance the London-focused perspective suggested by recent Ofcom research, particularly if they had sufficient authority to make decisions and could access dedicated sources of funding.

Public Purpose 4 requires the BBC to 'support the creative economy across the UK'. In this respect, we recognise that strategic developments such as establishing the BBC's Drama Village in Cardiff Bay may well have contributed significantly to the local production economy, benefitting freelance workers in particular. However it is important to distinguish between the economic benefits of sourcing such production and the need to secure sufficient portrayal and representation of people living in Wales within the BBC's programme output as a whole.

Changes within the production ecology may also have muddied the waters. While the opening up of the majority of the BBC's output to competition from independent producers has been generally welcomed, the creation and operation of BBC Studios is less transparent and may again be a factor driving London-based commissioning decisions. In our view, the operation and impact of BBC Studios and its relationship with commissioners across the BBC should therefore also be explored as part of this Review.

On-Demand Viewing

Current developments in streaming and on-demand television are challenging the way in which the BBC can secure prominence for its content, in the face of global competitors such as Netflix and

⁶ Screening the Nation: Landmark Television in Wales, BBC Trust 2010: <http://culture.research.southwales.ac.uk/screeningthenation/>

Amazon Prime. Prominence of content within the BBC's iPlayer for programming from the nations and regions has also become increasingly important in achieving reach and impact and this aspect of distribution should also be considered in this Review along with data relating to conventional linear television viewing.

Conclusion

In this response we have attempted to set out our views relating to the criteria to be applied in setting out the terms of reference for the forthcoming review of representation and portrayal on the BBC. We believe there is a robust case for examining how viewers in Wales are served by the BBC and the need to reflect their lives both for its television output for Wales and for the UK as a whole. However, if Ofcom staff believe we have misinterpreted the purpose and focus of this review, we would be very grateful to receive an explanation and their reasons for reaching such a conclusion.

Ofcom ACW
March, 2018