Submission to Ofcom's thematic review of representation and portrayal on the BBC
March 2018

This submission and CAMEo

This submission suggests considerations for Ofcom's review of the BBC's representation and portrayal of the diverse communities of the UK. Purpose 4 of the Public Purposes in the BBC Charter suggests that the BBC's output must, 'reflect, represent and serve the diverse communities of the UK'. But recent BBC and Ofcom research suggests that especially younger audiences from working-class backgrounds, ethnic monitories, disabled people and individuals identifying as LGBT do not feel that their needs are being met.

We address areas of consideration in relation to each of the proposed methods for Ofcom's review in terms of: *Framing, Speaking to audiences, Content analysis* and *Understanding the content creation chain.*

The submission is made by the CAMEo Research Institute for Cultural and Media Economies at the University of Leicester. CAMEo works with academics as well as practitioners and policy-makers and hosts a range of research, knowledge exchange and engagement activities on cultural work, the 'creative economy', arts, media and cultural policy, consumer culture dynamics, and the mediation and representation of cultural and economic life.

CAMEo staff have worked on related projects on television representation and audiences which include the AHRC funded *Television for Women* project, presented to BBC heads in 2014, and the ESRC funded project on *Reality Television and Class* co-led by Helen Wood. We have also undertaken the British Film Institute's recently launched report *Workforce Diversity in the UK Screen Sector* and various other projects on diversity, representation and social inclusion in cultural work, including CAMEo Principal Researcher Helen Wood's (2012) book *Reacting to Reality Television* and CAMEo Director Mark Banks's (2017) book *Creative Justice*.

CAMEo would be delighted to assist with the Ofcom Review and contribute its extensive expertise in an operational or advisory capacity. ███
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Overall framing of the Ofcom Review

1. The focus on 'representation and portrayal' proposed in the Terms of Reference is welcome to draw attention to critical aspects of diversity in the BBC's delivery. However, the Ofcom Review should be broadened to also explicitly focus on (1) 'voice', i.e. talk-based programming, which makes up a large proportion of television output; and (2) 'mode of address'[i], i.e. how the audience is specifically addressed, which crucially shapes the way audiences can feel included or excluded.[ii] Including voice and mode of address in the Review's parameters will also be crucial for understanding the representation of regional dialects and geographies, and assessing the perceived 'London-focussed perspective'. Voice and mode of address should form parameters for the content analysis and of the audience research.

Terms of Reference 1.12 – New quantitative data

2. The language/terminology used in surveys substantively influences the data collected. To ensure that viewers can relate to the survey and offer useful data. For instance we would suggest the current 2017 Distinctiveness Survey be revised to ensure data quality.

3. Genre: Replace industry-phrasings of content (arts and culture, entertainment, current affairs etc.) with more vernacular understandings of genre that audiences are familiar with and use themselves (crime, daytime, reality etc.). These revisions should produce more fine-grained data in relation to programming style.

4. Quality: Remove or ask viewers for their opinions on what constitutes 'quality'. 'Quality' in relation to the symbolic ideas of the BBC has tended to mean period drama which is neither representative of the BBC's output nor many viewers' key focus.[iii]

5. 'Made for the UK': Rephrase or explain this measure of distinctiveness in a more audience-friendly way. The current phrasing is likely to be hard to relate to for the UK's multiple and overlapping sets of ethnic minorities – a key group of those currently feeling under-represented by the BBC.[iv]

Terms of Reference 1.13 – Speaking to people

6. Collecting qualitative views from a wide range of backgrounds and communities is welcome. However, the Review should include an explicit focus on viewers who are not or no longer watching the BBC. The 2017 PSB survey focuses on 'regular viewers' whilst the qualitative Distinctiveness research is very limited in its scope (10 workshops). Reaching

'disengaged' audiences is vital for understanding how the BBC delivers on its targets and why it might fall behind certain delivery aims.

7. A strategy of engagement might be necessary to speak to the younger C2DE demographic. Research points to working-class groups feeling excluded from policy discussions and also suspicious of taking part in research.[v] We would suggest the use of focus groups or more sophisticated workshops as standard, but also pursuing alternative methods to engage audiences. A successful method used in our previous AHRC research was a 'pop-up' shop in a local town centre.[vi]

Terms of Reference 1.14 – Content analysis

8. The proposal to conduct content analysis is welcome. Content analysis will provide important information for the Review. However, it needs to do more than measure 'how frequently groups appear on screens' (Terms of Reference, 1.14).

9. Content analysis needs to account for how groups are represented, not just how often they appear. To do so, content analysis should take into account roles, relationships and settings of characters and presenters, as exemplified in an established body of academic literature.[vii]

10. The review should also consider conducting sampled qualitative and interpretative analysis to address issues of mis-representation which can be as damaging as under-representation. Factual television, for instance, has significantly increased the visibility of working-class people on television but because they are often portrayed as 'dole scroungers' or in need of 'improvement', their representation remains profoundly problematic.[viii] Similar issues pertain to the representation of Muslims on television.[ix]

Terms of Reference 1.15 and 1.16 – The content creation chain

11. Again, this is an important and welcome component of the Review. Decisions throughout the content creation chain vitally influence the BBC's ability to deliver on its targets. These decisions are crucially influenced by a number of so-far under-researched aspects. The Review should seek to systematically map these influences and provide the BBC with concrete recommendations for improving decision making in the content creation chain and therefore better delivering on its targets.[x]

12. Workforce diversity influences content generation directly (e.g. in commissioning and ideas generation) and indirectly (e.g. by influencing organisational culture). Our 2018 review Workforce Diversity in the UK Screen Sector, undertaken for the BFI, has shown, data on workforce diversity has substantive gaps and barriers to workforce diversity are not being removed effectively.[xi] Ideally, the Ofcom Review should seek to map the content creation

chain for workforce diversity. As a minimum, qualitative interviews should seek to establish key workforce-diversity related influences on decision-making in the content creation chain, allowing interviewees to provide information anonymously if necessary.

13. Diversity on screen is influenced by the interplay of commissioning and creative processes. Using a methodology that asks questions of who and how, the Review should consider, for instance, practices and values of production staff, how organisational process and human judgement affect content production, and how cultural values and ideals embedded in professional practices influence the production of content.[xii]

14. The Review needs to understand the content creation chain needs in its broader business and economic context. For instance the broader political-economic systems of organisations that pursue commercial goals might have an impact in the production of content as purely cultural good. Such macro-level pressures need to be linked to micro-level interactions and practices of the content creation chain.

15. The Review should commission case studies into key content creation chains that provide understanding of how decision making parameters identified by recent research play out in the BBC, and that can offer concrete recommendations of how the BBC might improve target delivery through attending to the content creation chain.

References

[i] There is a body of broadcast discourse research which analyses the language features of conversational style and address to audiences. This is different to quantitative and qualitative approaches to television analysis that tend to focus on drama. For an overview see Tolson, A (2005) *Media Talk: Spoken Discourse on TV and Radio,* Edinburgh University Press.

[ii] Wood, H (2009) *Talking With Television* University of Illinois Press.

[iii] Geraghty, C (2003) 'Aesthetics and Quality in Popular TV Drama' *European Journal of Cultural Studies* 6(1): 25-45.

[iv] Malik, S (2018) 'Diversity: Reflection and Review' In Freedman, D and Goblot, V (eds.) *A Future for Public Service Broadcasting* Goldsmith Press, London.

[v] https://www.jrf.org.uk/report/white-working-class-views-neighbourhood-cohesion-and-change

[vi] *https://warwick.ac.uk/fac/arts/film/research/current/televisionforwomen/popupshop/*

[vii] For instance, Hansen, A and Machin (2010) *Media and Communication Research Methods* London Palgrave.

[viii] Skeggs, B and Wood, H (2012) *Reacting to Reality Television: Performance, Audience and Value* London and New York, Routledge.

[ix] MacDonald, M (2011) 'British Muslims, memory and identity: Representations in British film and TV' In *European Journal of Cultural Studies* Vol 44 (4): 411-427.

[x] Eikhof, D.R. (2017) 'Analysing decisions on diversity and opportunity in the cultural and creative industries: A new framework', *Organization*, 24(3): 289–307.

[xi] https://www2.le.ac.uk/institutes/cameo/publications/workforce-diversity-in-the-uk-screen-sector-evidence-review

[xii] Hesmondhalgh, D (2017) 'The media's failure to represent the working class: Explanations from media production and beyond' In Deery, J and Press, S (eds.) *Media and Class: TV, Film, and Digital Culture* London, Routledge.