

*Championing
excellence and diversity
in broadcasting*

Founded in 1983 by Jocelyn Hay CBE



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**RESPONSE BY THE VOICE OF THE LISTENER & VIEWER
TO THE TERMS OF REFERENCE FOR THE OFCOM THEMATIC
REVIEW OF REPRESENTATION AND PORTRAYAL ON THE BBC**

March 2018

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INFORMATION ABOUT THE VLV

The Voice of the Listener & Viewer Limited (VLV) represents the citizen and consumer interests in broadcasting and speaks for listeners and viewers on the full range of broadcasting issues. It uses its independent expertise to champion quality and diversity in public service broadcasting, to respond to consultations, to produce policy briefings and to conduct research. VLV has no political, commercial or sectarian affiliations and is concerned with the issues, structures, institutions and regulations that underpin the British broadcasting system. VLV supports the principles of public service in broadcasting. It is a charitable company limited by guarantee (registered in England and Wales No 4407712 - Charity No 1152136).

COMMENTS

1. VLV welcomes the opportunity to comment on the Terms of Reference for Ofcom's Thematic Review of Representation and Portrayal on the BBC.
2. We welcome Ofcom's efforts *'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'*¹ however VLV believes that in its analysis of how well the BBC delivers Purpose 4 in the Charter Ofcom should go beyond analysing simply portrayal and representation on television.
3. VLV believes the ambition of Purpose 4 in the Charter goes far beyond simply representation and portrayal of the UK population. While it demands that the BBC accurately reflects and portrays the whole population of the UK, including those who live in the nations and regions and are members of minority groups, it also demands that:
 - the BBC *serves* the whole population
 - *'raise[s] awareness of the different cultures and alternative viewpoints that make up its society'*
 - *'the BBC should bring people together for shared experiences'*
 - *'help contribute to the social cohesion and wellbeing of the United Kingdom'*
4. VLV notes Ofcom's and other research which shows that the PSBs in general do not achieve balanced representation of the UK population.
5. With reference to the BBC, while representation and portrayal are important aspects of Purpose 4, VLV would suggest that the Terms of Reference for any Review of the delivery of this Purpose are too limited. They should also include consideration of the other aspects of the purpose as outlined above.
6. While it is important that citizens have access to content which reflects their lives, this is not the only driver for them to consume content. People do not consume content simply because it reflects people like themselves; they consume it for a range of reasons: to broaden their

horizons, for information, entertainment and enjoyment. There needs to be a balance between accurately reflecting the lives of people across the UK and the issues which are important to them as well as providing citizens with content which will *bring people together for shared experiences* and make them aware of *different cultures and alternative viewpoints*.

7. VLV hopes that this Review will lead to better representation on air of the diverse population of the UK however we are concerned that any measures instituted as a result of the Review should not limit the creative decisions of the BBC. It would be all too easy for this process to become a box-ticking exercise which limits the BBC's ability to have the creative freedom to provide audiences with a range of engaging, entertaining and informative content.
8. With reference to paragraph 1.5 VLV strongly believes that Ofcom's Review should include radio as well as television output since Ofcom is responsible for assessing the BBC's delivery across all its television and radio services. While VLV agrees that visual representation on screen is an important contributor to Purpose 4, radio is an essential element of BBC output which should not be overlooked.
9. Any review of the BBC's delivery of Purpose 4 should be comprehensive covering the whole range of genres provided by BBC television and radio, including news programmes, children's programmes, drama and factual programmes.
10. In paragraph 1.7 Ofcom says that '*The people who we see on television should be broadly reflective of those who are watching it.*' VLV disagrees with this approach. The BBC should provide content on radio and television which should be reflective of the UK population, not just reflective of the audience.
11. VLV is concerned about the reference to the research Ofcom conducted into BBC Distinctiveness which showed that *people felt that the BBC often has a London-focused perspective* in Paragraph 1.8. VLV acknowledges there is a range of research which has highlighted that citizens in the nations and regions do not consider they are well represented on television, however the research Ofcom conducted into BBC Distinctiveness was based on a small sample of 182 people. VLV hopes that this Review Ofcom is planning to conduct will be more comprehensive and the sample surveyed will be larger than that surveyed for the BBC Distinctiveness research.