

KANTAR MEDIA

**Researching the BBC's draft Editorial Guidelines with
the UK public**

A report for the BBC Trust

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1 Introduction and objectives

This report summarises the findings of research about the BBC's draft Editorial Guidelines, which the BBC Trust commissioned Kantar Media to undertake. The research was conducted between November 2009 and February 2010 across the United Kingdom.

The BBC Trust is the governing body charged with the responsibility to ensure the BBC delivers its remit in accordance with the Royal Charter, which gives the BBC the right to broadcast and publish content.

The BBC's Editorial Guidelines cover everything the BBC broadcasts and puts online. They set out the standards required of people making programmes and other content for the BBC. They exist to guide content producers in making considered editorial decisions that balance freedom of expression with their responsibilities to the audience, contributors and others. The Guidelines are also used by BBC management and the BBC Trust when considering complaints about BBC content.

The Editorial Guidelines are reviewed approximately every five years. The BBC Executive is in the process of revising the Guidelines, at the request of the BBC Trust, which is responsible for approving them. The updated Editorial Guidelines will be published in autumn 2010.

The Editorial Guidelines are primarily an aid for programme makers and others making content for the BBC. However, it is important that the standards set out in the Guidelines reflect the expectations of the public. A public consultation was conducted by the Trust, between 7 October and 24 December 2009, in order to feed into the review process. In parallel with this exercise, Kantar Media was commissioned to conduct research among a sample reflective of the population of the United Kingdom, in order to assess their views on the draft Editorial Guidelines. As a qualitative methodology was used the sample was not fully representative.

The Guidelines are detailed and run to nineteen sections. The focus of this research was on key areas of three of the draft Guidelines:

- Accuracy (Section 3)
- Impartiality (Section 4)
- and Harm and Offence (Section 5), with particular reference to Language (5.4.20-5.4.25), Intimidation and Humiliation (5.4.31), and Portrayal (5.4.37-5.4.38).

Specific objectives of the research among audiences were to:

- Gauge awareness of the Editorial Guidelines
- Assess the clarity and appreciation of the draft Editorial Guidelines

- Understand responses to the draft Editorial Guidelines, exploring perceived relevance and appropriateness
- Explore the understanding of and response to the terms 'due accuracy' and 'due impartiality' in relation to the draft Editorial Guidelines on Accuracy and Impartiality
- Explore the understanding of and response to the terms 'professional judgement pieces' and 'personal views' within the draft Editorial Guidelines on Impartiality
- Explore the understanding and appreciation of the need for content producers to balance freedom of speech against the need to maintain standards and the implications for the draft Editorial Guidelines
- Note any differences across different sections of the public.

2 Overview of methodology and sample

This study was designed to be both broad and inclusive in order to reflect the views of the diverse range of people in the UK. A qualitative approach was used, centred around discussion and debate, to enable exploration of perceptions and reactions to the Guidelines.

Each session started by considering people's awareness and expectations of guidelines, then progressively introduced extracts of the draft Guidelines for review. The Guidelines were then scrutinised with the aid of articles and clips of BBC content in order to challenge responses and provide considered feedback. This cumulative approach helped to steer us through the unfamiliarity of the language used in the Guidelines to the ideas and themes encapsulated in the Guidelines.

Although the Guidelines relate to output across all platforms (radio, television and websites) and this was emphasised in the discussion sessions, respondents tended to focus on television or use it as a synonym for all media platforms. Similarly, there was a tendency for respondents to consider the BBC generically as a representative of all broadcast media.

Due to the nature of the themes covered in the Harm and Offence Guidelines, some of the clips carried the potential to cause respondents embarrassment and offence. Measures were put in place to mitigate this, at both the recruitment stage and in the fieldwork, by being clear about what we were going to show and by being judicious and sensitive in the way we used the material. We encouraged respondents to record their personal reactions privately at first, and then directed their attention back to the Guidelines in order to use the clips as stimulus (as intended) rather than scrutinise them extensively as texts in themselves.

The sample was made up of three components, each designed to cover different sections of the population and each approached in a slightly different way.

The main sample was broad, covering men and women aged 18 to 70, and included parents, grandparents and people without children. We talked to people across the social spectrum in terms of social grade, ethnicity and religion, and also different levels of BBC approval. We conducted group discussions on the Harm and Offence Guidelines first, followed by reconvened discussions on the Guidelines for Accuracy and Impartiality, allowing respondents the intervening period for further reflection and to register any thoughts while consuming BBC content in their day-to-day lives. These discussions were preceded by tasks that encouraged the respondents to

consider some of the issues that would be raised in the discussions. The groups lasted about two hours with five to eight people each.

In order to include the views of people less likely to be represented within the main part of the sample and people whose views might differ from others', we conducted immersion sessions targeted at specific groups of people. These sessions took place in respondents' environments, such as a church and local community centres, and dwelt on the issues that they felt most relevant to them. We used materials flexibly, adapting to the needs of the situation. We also spoke to community leaders, both religious leaders and professionals who encounter different sections of society, for their perspectives. The immersion sessions lasted about two to three hours with between two and five people each; the in-depth interviews with community leaders lasted about an hour.

The third component of our sample was teenagers, spanning ages 13 to 17. We met them across all four nations in informal sessions configured around friendship pairs (of matched school year and sex), and touched on all three Guidelines with them. The tasks and materials used were adapted to be age appropriate. These sessions ran for about 1½ hours, each with two to four teenagers.

Across the sample there was a mix of media platforms used by the respondents (television, radio and internet) and a mix of media brands used.

In total we conducted the research with 195 people in 45 sessions across 12 locations around the UK, covering urban through to more rural areas. The full sample details can be found in the appendix.

3 Executive summary of main findings

- There was virtually no awareness of the BBC's Editorial Guidelines among the sample in this research, and generally low awareness of any guidelines or regulations for any channel or media provider. However, there was an implicit expectation of some means of ensuring high standards at the BBC, be that by the BBC, a regulatory body or simply through market forces.
- There was a general perception, more evident among older people (aged 55 and over), of declining standards right across the media and moral erosion throughout society at large. There was a noticeable generation gap, with the oldest finding more that offends them right across the media. Some older respondents and religious leaders feared that programme makers are younger people who are more interested in pushing boundaries and courting controversy than having any concern for moral standards. Some wanted the BBC to take a more protectionist stance and instil values in impressionable youth, with the support of Guidelines that assert high moral standards. Whilst many younger respondents tended to be concerned about stereotyping and feel that respect should be shown for others irrespective of socio-cultural differences, some older respondents could not easily relate to this concern and did not take offence at comments which some of the younger respondents found instinctively offensive. Interestingly, many of the younger respondents wanted to shelter their elders from crude behaviour and language.
- Most across the sample wanted the BBC to uphold higher standards than other media organisations, and many wanted the BBC to be a moral compass. There were others, especially younger people, who wanted the BBC to reflect the world as it is rather than inculcate current mores. Younger people were typically less concerned about standards, although there was an increased concern among new parents.
- When revealed, few were surprised by the existence of the Editorial Guidelines and most were welcoming of them. For many, though, the Guidelines provoked questions about the effectiveness of their implementation, which led to further questions about the people who have to use them and the representativeness of those charged with making judgements against them. They wanted the BBC to reflect the full diversity of society.
- A few were resistant to the idea of guidelines, which they feared smacked of bureaucracy and outmoded authoritarian values. They called for freedom of expression and expressed concern about any type of censorship. Others, more

cynically, suggested the BBC needs Guidelines for its own interests, to protect itself.

- On the whole, most believed in choice and self-regulation, which they considered to be just as important as the implementation of Guidelines or rules. It was felt that in a free society it is better to avoid rather than ban or censor content; it is easy to change channel or switch off. The exception to this concerned children, especially pre-teens, who were presumed by most to be incapable of self-regulation.
- The draft Guidelines were generally well received in principle. They were considered by many to cover the right points, striking the right balance between freedom of expression on the one hand and protection on the other, and they seemed to be comprehensive.
- However, many respondents felt that the Guidelines were not easy to digest and were unclear as to how the BBC could deliver on these expectations. They contain a wealth of words and terms that were not known or understood by most teenagers and some adults. Moreover, many felt the phrasing made the Guidelines appear contradictory in places, leaving them open to interpretation and prompting some to suggest they contain loopholes. Some questioned how the Guidelines could be used in practice and cautioned that it would probably be possible to identify a clause in support of almost any argument. This was a cause for concern among those despairing of declining standards.
- Of the three Guidelines considered in this research, Harm and Offence aroused the most debate. It touched on the most emotive and accessible issues and revealed differences of opinion across the sample. Generally, younger people took a more liberal stance, preferring people to self-regulate, while some (but not all) of the oldest (as well as some religious leaders and a few of the ethnic minority respondents) wanted a more protectionist approach. By contrast, the Guidelines on Accuracy and Impartiality provoked less debate and there was near consensus in the response.
- There was wide recognition of the need to balance protection of audiences with allowing the BBC to make the programmes and content that people have come to enjoy and value. Even among those who were more likely to identify areas of offence there was acceptance that the BBC should be allowed to reflect the real world. The context of language and behaviour were generally felt to be more significant than any word or act in itself: when words and acts were considered gratuitous and out of context they were more likely to be considered offensive. Context was judged in terms of the perceived intention, relationship and

expectation of the people depicted in a programme or content, as well as the genre of the programme or content.

- Signposting, though an unfamiliar idea, was considered a useful means of resolving the tensions between protection and freedom. Respondents felt that if people are warned about strong language or behaviour then it is up to them to make the decision about whether or not to watch, listen or read on. A preference was expressed for avoiding bleeping, either by leaving content unaltered or by editing it, but there was acceptance that on occasion it can be necessary.
- The 9pm watershed¹ was the most salient aspect of the Editorial Guidelines. It was often mentioned spontaneously and reinforced the widely held view that the Harm and Offence Guidelines should pay particular attention to the protection of children. Many believed that children (especially pre-teens) are incapable of self-regulation. A few considered some parents incapable of adequately protecting their children. Many were worried about whether the effectiveness of the watershed was being eroded, particularly in an era of on-demand content and increasing ownership of personal devices for consuming content, and some wondered whether the watershed still exists. Several suggested it should be moved to 10pm or at least operate as a sliding scale.² Against this strong concern for children, a few argued that children should not be sheltered from the real world.
- More generally, while most felt the Guidelines should prevent gratuitous offence being caused, many believed in exposing difficult issues such as racism and they considered the Guidelines made provision for this. Context was the key.
- Strong language was considered a wide category that covers both swear words and terms of abuse. Some suggested *offensive language* might be a better term. "Swear words" were considered more acceptable if judged appropriate by the context. Terms of abuse referring to race or disability would require greater consideration but might be justified. Most felt the draft Guidelines got this right. The listing of the strongest words in the Guidelines was supported, though

¹ The watershed only applies to television. Material unsuitable for children should not, in general, be shown before 2100 or after 0530. Source: www.ofcom.org.uk/tv/ifi/codes/bcode/protectingu18

² The Editorial Guidelines state that the 9pm watershed signals the beginning of the transition to more adult material, but the change should not be abrupt. Source: draft Editorial Guidelines, Section 5.4.6.

tolerance for these words varied and a few found it hard to conceive of any circumstances when use of the strongest language³ might be justified.

- Many felt forgiving of the accidental use of strong language in live broadcast and did not want to jeopardise live broadcast, but others suggested ways to maintain standards without compromise by using time delays and editing or bleeping where necessary. Most approved of the firm stance taken in the draft Guidelines.
- The description of stereotyping, as it was addressed in the draft Guidelines, was generally considered acceptable, although many expressed concern about derogatory portrayals, particularly of people deemed unable to defend themselves. On the whole, portrayal was of greater interest and concern to the minority groups.
- Both the Accuracy and Impartiality draft Guidelines seemed more straightforward to respondents and on consideration most thought them more important than Harm and Offence because of their fundamental role in trust in the BBC. Both were considered more relevant to factual content – and imperative for news.
- Few at first appreciated the nuance that accuracy can be more than a matter of right and wrong and most wanted the Guidelines to maintain the highest possible standards. This was considered particularly important on controversial topics, which most felt was rightly pointed out in the draft Guidelines. However, there was less concern in the realms of light entertainment and drama, with the exception of the portrayal of something factual that is central to a story. This led to acceptance of the term *due accuracy*, which was not immediately clear to all. Generally, inaccuracies were deemed more permissible in a light entertainment piece than in a documentary or educational content as long as the inaccuracy is not at anyone's expense. Accuracy was considered particularly important when there might be some consequence.
- Two additional areas pertinent to accuracy were identified: scientific language and visual communication. Where a point is made with numbers and percentages – which provide an aura of scientific authority and certainty – most believed the facts presented should be indisputable and carefully delivered with precision. Particular care was also expected in the use of visual images, which can powerfully convey meaning.

³ The strongest language is defined as the c-word, the f-word and the m-word. This is elaborated in this report in Section 6.5 Strong language.

- Impartiality was considered more complex than accuracy. Although the word *impartiality* was not known by all, the concept was appreciated in terms of bias and carried similar responses to Accuracy, such as the need for greater care on controversial topics. As with the term *due accuracy*, *due impartiality* was not understood by all at first, but the concept was supported, as was *due weight*. A few considered the BBC's impartiality to be slipping, although others suggested that dissatisfaction could result from strong feelings held by the public on some issues rather than a failing of impartiality by the BBC.
- There was support for the inclusion of opinions in BBC output, particularly in factual formats such as debates. Although the distinction between *personal views* and *professional judgements* was not clear to all – and some pointed out that there can be a blurred line – generally both were considered appropriately covered in the draft Guidelines. Professional judgements were considered a less clear-cut category and would require greater care in practice because they might appear to be invested with the authority of the BBC. Some were wary of the power of a large media organisation to affect people's views. Many pointed to the need for clear separation of fact from opinion, which is mentioned in the draft Guidelines.
- The medium has a bearing on what is tolerated. Mainstream, mass audience news broadcasts were generally considered to require greater care than a correspondent's blog, which has to be sought out and therefore has more scope to provide a perspective.

4 Awareness and expectations of Editorial Guidelines

This section covers the lack of awareness of the Editorial Guidelines and presents respondents' requirements of the issues that should be addressed by guidelines. It also identifies the attitudes that informed respondents' assessment of the draft Guidelines and their expectations of the BBC.

4.1 Awareness of Guidelines

There was virtually no awareness of the BBC's Editorial Guidelines among the people included in this research. Indeed, there was generally low awareness of any guidelines or regulations for any channel or media provider. When respondents were asked how they believe the BBC deals with quality and standards few were able to say. When pressed, various suggestions were offered by way of conjecture. Some perceive the BBC as a state broadcaster and believe it is in some way overseen by the Government, perhaps by some kind of panel. In this vein, some mentioned the Charter, suggesting it must have some bearing on quality and standards, though by what mechanism they were unsure. Others suggested there must be a complaints system, and there was some mention of Ofcom. Some speculated that there is an independent body overseeing the BBC, though there was very little awareness of the BBC Trust and its role. Reassurance about the BBC Trust's independence was required by some. Others imagined the BBC gauges itself against other channels and that quality and standards are achieved through the forces of competition and ratings.

"Hasn't the Government got something to do with it as well, saying what they have to show?"

(Male, 25-54, Exeter)

"I imagine people sat in a room in front of loads of screens saying 'that can't go out!'"

(Female, 15-16, Manchester)

"I'd imagine there's a 'suitability guide'."

(Female, 35-54, Manchester)

4.2 Expectations of Guidelines

Nevertheless, there was an implicit expectation that there is some means of ensuring high standards from the BBC, even if there was uncertainty about how this is achieved.

"Who is going to give it this careful consideration and who is it being referred to? I think there should be someone who is answerable to the public or a complaints commission of whoever it is."

(Rabbi, London)

When introduced, there was little surprise that Editorial Guidelines exist and most approved of the idea of having Guidelines, seeing them as necessary and important. Respondents could envisage Guidelines being useful to those involved in making programmes and content, while also providing a point of reference for internal policing. Those with higher BBC approval had greater interest in the Guidelines and implicit faith that they would be appropriate. However, all agreed that Accuracy, Impartiality and Harm and Offence should be covered within the Guidelines.

"I think it's something you'd expect from such a large company."

(Female, 18-34, Belfast)

"I think it's good. I think they should all have them."

(Female, 35-54, Manchester)

Some were a little cynical and cautioned that Guidelines might be self-serving, especially if written by the organisation for itself and not independently implemented. They wondered whether Guidelines exist for the benefit of audiences or for the BBC to protect itself.

"Well you would expect that. They've got to cover themselves."

(Gay male, Manchester)

"See, when the guidelines are being made up by the company who's going to produce the programmes, is it not that they can kinda produce what they like?"

(Male, 55-70, Glasgow)

"People can write up guidelines to suit themselves."

(Male, 55-70, Glasgow)

"Why do the management write the Guidelines when it would seem that the Trust should... You are drawing out guidelines for yourself!"

(Rector, Belfast)

A few dissenting voices went further, decrying the imposition of authoritarian values, arguing against bureaucracy, the "nanny state" and any suggestion of censorship, and calling for freedom of expression to triumph.

"A lot will depend on interpretation but overzealous or too rigid implementation would not be good."

(Male, 55-70, Manchester)

"[Guidelines] don't reflect the reality of society today – attempting to remove choice from the individual. Too rules focussed! Bureaucratic waste of money! Licence fee, nanny state, 'big brother' society!"

(Female, 18-34, Newcastle)

Many pointed out that the Guidelines in themselves are just the starting point. They raised lots of questions about the implementation of the Guidelines. Are the people involved in making programmes and content trained on the Guidelines? How do the Guidelines take effect? Are they in effect a restraint against populist content? Do they work only when there is a complaint?

"If I'm a manager I want the best viewing figures, the best programme, so I'm going to push it and adjust the Guidelines to achieve my objectives."

(Rector, Belfast)

Furthermore, some questioned whether decisions are made fairly and consistently. Some cited recent examples that they considered demonstrated unfairness and inconsistency. They compared the BBC's censure of Jonathan Ross and Russell Brand⁴ (October 2008) with what they perceived as its failure to censure *Question Time* on its treatment of the BNP's Nick Griffin (October 2009), which many considered unfair. They also contrasted the dismissal of Carol Thatcher⁵ from *The*

⁴ See www.bbc.co.uk/bbctrust/assets/files/pdf/appeals/esc_bulletins/2008/brand_ross_moyles.pdf

⁵ Carol Thatcher used the word *golliwog* in an off-air remark in *The One Show* hospitality room on Thursday 29 January 2009, which caused offence to those who heard it at the time and also to members of the production team who heard about it later on. Carol Thatcher apologised but declined to issue an unconditional apology and this led to her departure from *The One Show* as a roving reporter.

One Show (January 2009) with the different reaction to Anton Du Beke⁶ of *Strictly Come Dancing* (October 2009), both over remarks made off air.

Moreover, some were concerned about who enforces the Guidelines, how they interpret the Guidelines and how this might affect any judgements. They wondered whether they are in touch with current values. Some suspected decisions are made only by white, middle class, older men, whereas they wanted the BBC to reflect the full diversity of real life, with people of all backgrounds.

Most felt that the Guidelines should strike a balance, ensuring protection whilst also allowing freedom of expression. If the Guidelines were to be too restrictive there was concern that they might stray into the realm of censorship, which carries ominous implications for a free society. Most felt that generally people should take personal responsibility for the media they consume. They felt happy with self-regulation: they pointed out that it is easy to change channel or turn off the television to avoid offence.

"You can always turn it over or turn it off if you don't like it."

(Male, 55-70, Cardiff)

"I don't want too much of this 'big brother' thing."

(Male, 55-70, Glasgow)

However, almost all acknowledged the need to protect children and young people and in particular pre-teens, who were considered incapable of self-regulation, even by older teenagers. A few argued that some parents are incapable of overseeing their children's media consumption. In contrast, though, a few who were not parents felt strongly that sheltering children might itself be harmful or at least limiting. They wanted children to be exposed to real life, with difficult issues opening up opportunities for discussion and learning about the world as it is.

There was another area of concern, which was put forward by some minority groups, whose views otherwise were similar to everyone else's. They called for greater sensitivity to their perspective (and those of anyone who might be deemed vulnerable), particularly in relation to portrayal of themselves. An Asian respondent pointed out that it would be an inaccurate portrayal if a Muslim family went to the pub in a soap opera. In the discussions with deaf people and blind people there was

⁶ Professional dancer Anton Du Beke used the word *Paki* towards his dance partner, Laila Rouass, on *Strictly Come Dancing* in September 2009. This remark was made off air. He subsequently issued an unreserved apology, which Laila Rouass accepted.

interest in including deaf or blind characters in the media without focusing on their disabilities. The gay respondents called for more rounded gay characters to be presented in the media, beyond "camp" stereotypes. Similar desires were expressed in sessions with travellers, transgender and transvestite people, and people leading alternative lifestyles. For many of these minority groups, their minority status was intrinsic to their sense of identity but they wanted it to be incidental in media representations.

4.3 Standards

Even before seeing them, many wanted the Guidelines to articulate standards and felt compelled to discuss their perceptions of standards. Although many did not want onerous restrictions placed on the BBC, respondents talked about what they felt was a widespread sense of generally deteriorating standards and moral decline across the media and society at large. Whether the media is reflecting or provoking the decline was a moot point. This perception of moral decline was strongest among older people, particularly grandparents, and the concern was echoed by religious leaders.

"One doesn't get the impression there are many guidelines around anymore. If there are, they are sort of, what shall we say, part of the culture rather than standing over a culture."

(Rector, Belfast)

"Times change and what was unacceptable and acceptable thirty years ago are no longer the same."

(Male, 55-70, Exeter)

"About ten to fifteen years ago they suddenly started swearing more on the BBC. I think they just followed the trend."

(Alternative lifestyle, South West)

"Let's face it, these days, twelve year old kids are running around swearing and doing a lot more than swearing..."

(Male, 18-34, Newcastle)

Some older people placed responsibility for society's impoverished moral stance squarely with the media, which they feared was overrun by young people setting out to be controversial, testing what they could get away with in programme making. They were concerned about the media trying to push boundaries, with the consequence, as they perceived it, being the erosion of standards.

"We're consumed by it now... If you've got children in the house... they're going to be conditioned by it... It's offensive to me."

(Male, 55-70, Glasgow)

"Soaps need to consider their audience and how they influence rather than reflect a decline in standards."

(Male, 55-70, Exeter)

While many perceived standards to be in decline, on the whole younger people (including teenagers) reported finding little to which they took personal offence. They believed the media simply reflects real life.

"[Skins] is kinda showing real life. On TV programmes, if everything's perfect, then nothing shows what real life is like. Then it's not that interesting to watch. I prefer it to be gritty."

(Female, 15-16, Manchester)

"It can teach us some stuff... There is raping out there and murderers so watch out!"

(Female, 13-14, Huntingdon)

"I think Waterloo Road should be put on a bit later with advice to say there's going to be some inappropriate things... like what they do with Big Brother."

(Female, 13-14, Huntingdon)

The exception to this was new parents, whose change of life stage had provoked a reassessment of their stance. Some of these new parents felt leaving people to self-regulate was no longer sufficient with young children in the equation. Some even expressed surprise at their increased concern on becoming a parent.

"Since I've had a baby I've pretty much wiped all that [strong language] out of my vocabulary, it's been like switching my brain off."

(Male, 18-34, Newcastle)

"I'm happy to see quite a few guidelines pointing to the protection of children, which is how it should be."

(Asian male, 18-34, Leicester)

"My eight year old daughter does not like it when she sees swearing on the TV and asks us to change channel."

(Alternative lifestyle, South West)

At the other end of the age spectrum, mirroring the sense of declining standards perceived by some, the oldest generally reported finding more that offends them across the media and also less that is relevant to them, particularly among older men.

Some older respondents were less tolerant and wanted restrictions on offensive material, backed up with punishment of egregious offences and transgressions. They took a citizen view, being especially concerned for children, although at the same time some were disparaging of political correctness. This illuminated a significant difference with younger people, who generally revealed a belief in the need to be respectful and sensitive to others: among the oldest there was not the same subscription to the belief in the need to be respectful to others irrespective of socio-cultural differences.

4.4 The watershed

There was much spontaneous discussion of the 9pm watershed⁷ in the context of how the BBC ensures high standards across its output. It became a touchstone for the ills of the media in general in the discussions.

"After nine o'clock they can do just about anything nowadays, can't they?"
(Male, 55-70, Glasgow)

"I would ensure that programmes that affect the mental health of young children and are shown before 9pm are moved to after the watershed ... Children as young as 4 or 5 believe these stories [in soaps] as representing real life."
(Female, 55-70, Exeter)

The watershed is the element of the Guidelines of which most were aware and which is most salient because of its role in the protection of children and young people. Indeed, it is virtually a synonym. There was wide approval of the inclusion of the watershed in the Guidelines.

There was much concern about the perceived erosion of the watershed, with many claiming it is no longer enforced, pointing in evidence to the pursuit of shock value at the expense of high standards.

⁷ The watershed only applies to television. The watershed is at 2100. Material unsuitable for children should not, in general, be shown before 2100 or after 0530. Source: www.ofcom.org.uk/tv/ifi/codes/bcode/protectingu18

"I don't think there's a watershed any more for any TV programme. There's stuff on soaps you never got years ago."

(Female, 35-54, Glasgow)

"Well there used to be [a watershed] with the telly, but I'm not so sure any more."

(Female, 35-54, Manchester)

"I asked kids 'are you seeing things you shouldn't see on TV?' and they all put up their hands."

(Catholic priest, Belfast)

Some feared its relevance is diminishing. They argued that it should be set at a later time (perhaps 10pm) or operate as a sliding scale⁸. They also believed it is becoming less effective in an age of increasing individual control and choice, with televisions common in children's bedrooms, and with many teenagers also having personal devices that allow access to multi-media content, and with the availability of on-demand television undermining its intended effect.

"Maybe the watershed should be ten. They've got various things on like after school activities. Or in the school holidays, all the dramatic storylines are at Christmas when everyone is staying up late."

(Social worker, London)

"The vast majority of young kids are watching TV till 10.30 and later... Every one of them has a TV in their bedroom... Should the likes of the BBC stop the other channels from polluting children's heads?"

(Catholic priest, Belfast)

"I feel on the whole the BBC tries to be fair in what material it puts out and how that is produced. Only occasionally is the watershed not observed. I do feel that the watershed should be moved to 10pm as so many children seem to be watching unsuitable programmes which frighten and upset more susceptible young minds."

(Male, 55-70, Exeter)

⁸ The Editorial Guidelines state that the 9pm watershed signals the beginning of the transition to more adult material, but the change should not be abrupt. Source: draft Editorial Guidelines, Section 5.4.6.

Interestingly, the older teenagers considered the watershed of relevance only to younger children. They did believe protection of younger children to be important.

"If it was moved to 10pm, I'd stay up later to watch the good stuff!"
(Female, 15-16, Londonderry)

Their concerns were not just about the use of strong language, but also sex, violence, bullying, drugs and difficult themes that many felt are common in soap operas. They reported their parents as being more concerned about social media, with its risks of bullying and grooming, than about broadcast programmes.

"My mum always tells me not to accept anyone I don't know on Bebo."
(Female, 13-14, Huntingdon)

"From time to time my dad will come into my room and check who I'm talking to on the internet and that."
(Female, 13-14, Huntingdon)

"Some parents are really fussy, some couldn't care less."
(Male, 14-15, London)

"Sometimes my dad worries if he hears something on the news about an old man contacting young girls over the internet."
(Female, 15-16, Manchester)

4.5 Expectations of the BBC

Most of the people we spoke to had higher expectations of the BBC than of other media organisations, particularly in relation to broadcast media. There was a general belief that the BBC should be a moral compass to protect audiences and should uphold higher standards (notwithstanding the few who felt uncomfortable about authority and imposed values).

"I would expect the BBC to be stricter; more appropriate."
(Female, 35-54, Manchester)

"The BBC is the baseline for quality."
(Female, 35-54, Londonderry)

"Your BBC is what you grew up with. It's a bit of a safety net."
(Gay male, Manchester)

"They are more careful than ITV and Channel 4."

(Asian female, 35-54, Leicester)

"...because they are getting their money out of taxes, so they ought to be."

(Rabbi, London)

Older people tended to want the BBC to help instil values in the "next generation" by setting high moral standards and protecting "impressionable youth". For their part, younger people revealed a concern for the wellbeing of their elders, albeit expressed as a desire to avoid uncomfortable situations.

"I wouldn't want to hear bad language in front of me mam!"

(Male, 18-34, Newcastle)

However, younger people were not vexed by current standards and did not share the desire for the BBC to be an instrument of uplift. They wanted the BBC to reflect rather than inculcate current mores.

Many felt their higher expectations were borne out by their experience of BBC content, which they considered evidence of the existence of Guidelines. Although some felt the BBC could do more to reflect the diversity and complexity of life.

5 Overall reactions to the draft Editorial Guidelines

This section presents the reactions to the draft Guidelines that were reached after respondents had spent some time considering them. It also details some of the barriers to comprehension and the concerns around this.

All the respondents in the research were informed that the current Editorial Guidelines run to nearly 200 A4 pages and cover 19 areas, and that this research was concerned with three of these areas: Accuracy, Impartiality, and Harm and Offence.

Respondents were told that the Editorial Guidelines are not written for consumption by the general public, but for the use of commissioners, writers, programme makers, content producers and editors.

Extracts of the draft Guidelines on these three areas were reviewed by respondents, through a progressive examination of sections. In the course of review, respondents were invited to comment by writing on their copies as well as participating in the discussions.

On the whole, the draft Guidelines were well received by most. They appeared to be comprehensive and cover the right points, balancing protection with freedom of expression:

"They cover all the areas of concern to me. At the end of the day it's down to interpretation and someone somewhere will be offended regardless..."
(Male, 55-70, Manchester)

"They appear to have taken everything into consideration and seem well balanced. They seem responsible."
(Female, 35-54, Glasgow)

"They clearly have the viewers in mind. I believe it's impossible to please everyone 100% of the time but these Guidelines do a very good job."
(Male, 18-34, Newcastle)

"I think they should have Guidelines... I think all of them are important. One's not more important than the other."
(Female, 15-16, Londonderry)

However, respondents could not assert with certainty that the Guidelines would deliver on their expectations and some had reservations about how they might be implemented. Many were concerned that programme makers would have the same difficulty trying to interpret the Guidelines. Some wanted to know the consequences of slipping up or, more significantly, disregarding the Guidelines. Others feared the Guidelines might inhibit programme makers.

"Lots of thought has gone into them, but I am concerned how some of them can be implemented without censoring..."

(Male, 55-70, Glasgow)

"They do cover all issues and in theory they are concise Guidelines. However, they do allow themselves to deviate from the Guidelines if they so wish and there are no consequences written down as to what happens when the Guidelines are not adhered to."

(Male, 25-54, Exeter)

"They are not specific enough: very open to any interpretation; don't take into account any action which would be taken; don't differentiate between factual and entertainment broadcasts; don't differentiate on child friendly programmes."

(Male, 55-70, Exeter)

"I would like to see the actual staff who are to apply these attend regular training courses to try and apply these rules to actual situations."

(Female, 55-70, Exeter)

"It must be quite difficult for programme makers, you know, considering there's so much..."

(Female, 35-54, Glasgow)

A few called for strict and consistent enforcement, particularly in light of perceptions of inconsistency.

"There needs to be zero tolerance on breach of Guidelines. No matter how famous or big the personalities are, it should be the same consequences for breaching Guidelines, and that individual should be responsible and not get a scapegoat instead."

(Female, 35-54, Manchester)

"In some cases they can still be abused, there shouldn't be any room for any loopholes..."

(Male, 55-70, Cardiff)

Though most respondents were broadly happy with the draft Guidelines, many (especially teenagers) did have difficulty getting through them. The Guidelines were difficult to comprehend in places and to some, therefore, felt inaccessible and too open to interpretation. Some (more so among older respondents), who were more alert to possible shortcomings, worried that it would be possible to identify a clause to support or challenge almost anything – “get outs” and “loopholes” as they put it – which did nothing to allay their concerns about young programme makers “trying to get away with it”, with all the potential for confusion, mistakes and abuse.

There were several reasons why respondents said that the draft Guidelines were difficult to digest and, therefore, to understand. These related more to language and style than to the concepts described.

- They contain passages with words and phrases that were not understood by some (including most teenagers), e.g. *pejorative, gratuitously, derogatory, editorially justified*.
- They are dense and seem legalistic in places, dealing with abstract ideas that are accompanied by elusive clauses (*may be necessary, seek to*) and circuitous passages (*however, nevertheless, apart from*) that make for difficult reading.
- They appear contradictory and open to interpretation in places, such as in this passage: *impartiality does not require... Nevertheless...* And similarly in this sequence: *We must not include any offensive language in... unless it is justified by the context... Even then...* Such “contradictions”, as they were perceived to be, led to some bewilderment.

The effect of this style was that some passages were simply misread, with missed words leading to misinterpretations. Moreover, some respondents tended to zero in on preconceived areas of concern at the expense of the intended meaning of the passage. Underlying these points was the tendency for the Guidelines to be read as rules, and the desire among some for them to define absolute standards.

"I would translate it to make it more simple, so other people can understand the Guidelines."

(Male, 14-15, London)

"Try to put it in layman's terms and make it understandable. You've got some big words that can be left open to interpretation and exploitation. Their interpretation and our interpretation is going to be quite different."

(Asian male, 18-34, Leicester)

"I nearly fell asleep... It's not going into my head. They could put it in a way that we can understand."

(Female Muslim, Leicester)

"To over-legislate can be a very cumbersome thing... it's said that a constitution should be written on one page of A4."

(Rector, Belfast)

Of the three Guidelines considered in this research, Harm and Offence aroused the most debate. This appeared to be because it deals with accessible and emotive issues. It noticeably raised more discussion around moral issues and touched on individual sensitivities to a greater extent than the other Guidelines researched. There was greater variation in response across the sample, which was driven largely by personal tolerance and individuals' moral perspective.

The Guidelines on Accuracy and Impartiality provoked less debate and produced near consensus in reactions. There was some variation in response to some of the details but not to the principles of these Guidelines. Impartiality was considered to be a more difficult concept for respondents to understand.

6 Draft Guidelines on Harm and Offence

The extracts of the Guidelines on Harm and Offence that were researched covered issues concerning language, intimidation and humiliation, and portrayal. (See appendix for extracts of draft Editorial Guidelines covered.) The sections on language were longer but respondents found it easier to engage with the issues.

Please note that parts of this section of the report necessarily contain strong and potentially offensive language.

This section begins by setting out the differences across the sample in reactions to the Guidelines on Harm and Offence. It explains opinions on the role of signposting and context in relation to the Guidelines and elaborates on strong language, discriminatory views, intimidation and humiliation, and portrayal.

6.1 Differences across the sample

There was noticeably some variation in views about the issues covered. These can be described on a spectrum ranging from liberal attitudes at one end to those who wanted to be more protectionist at the other.

There was greater weight of support at the liberal end, which was characterised by calls for freedom of speech and personal responsibility, and the desire for real life to be presented in the BBC's output. At this end of the spectrum, people displayed greater tolerance for strong and diverse programmes/content and appeared not to be as easily offended. At the other end, a minority held a more protectionist stance, taking a more moralistic view amidst perceptions of declining standards. They displayed lower tolerance for strong material and were more likely to identify areas of offence.

Along this spectrum, younger people tended to be at the more liberal end, alongside some of the over-55s (who were a noticeably polarised group), as well as some of lower social grades who had high tolerance for the use of strong language, which they described as being part of everyday life. At the other end of the spectrum, with a more protectionist outlook, were the community leaders (particularly religious leaders), some of the ethnic minority groups and also some of the oldest respondents.

Straddling the middle were some of the parents (especially those who had recently become parents), whose attitudes were generally liberal for themselves but more

protectionist towards their children and older generations. The teenagers themselves mirrored this, acknowledging the need to protect children, especially those younger than themselves. They were more concerned about sex, drugs and racism than offensive language. Those people from minority groups broadly spread across the spectrum and tended to call for consideration of issues that related to themselves, particularly in terms of portrayal.

This spectrum of views became less divergent when the stimulus clips were presented. Some attitudes softened in practice, while a few became less relaxed in their attitude. Those who felt that strong language and intimidating behaviour should not be permitted under any circumstances mollified their stance, with provisos about timeslot and signalling. For the most part, the context of the programme or content was deemed integral to judgements about its acceptability, and the inclusion of this in the draft Guidelines was supported.

6.2 Signposting

Signposting, as outlined in the Guidelines, was not a familiar term, but once explained the idea received wide approval. It was embraced to the extent that various guidance suggestions were proffered, such as making use of on-screen symbols and providing information similar to film classifications in listings. Signposting was welcomed as a useful way to resolve any tensions between protection and freedom of expression, alongside careful consideration of the timeslot and respect for the watershed.

"Then it's up to you or your parents whether to watch it or turn it over."

(Female, 13-14, Cardiff)

"I would add codes on-screen during all programmes to act as parental guidance – so parents can take a quick look at the screen to check content if their children are viewing on their own."

(Female, 35-54, Londonderry)

"We do have people phone up and say '[a child] has been affected by a storyline in [a soap]'. They've been watching and it's really had an impact, and the behaviour goes downhill. They should say before the programme starts... It might trigger some memory for them."

(Social worker, London)

6.3 Context

Although tolerances varied, it became apparent throughout the discussions that reactions to most strong language (and strong behaviour) were dependent on the context in which they are used. It was evident that the context could be more important than the word (or act) itself and could make the same word or action more or less acceptable for broadcast or use online. It was only when something was considered gratuitously offensive that it tipped over into being unacceptable to everyone. The Guidelines were therefore considered right to take account of context.

In the discussions, four context factors emerged as being particularly important. These were Intention, Relationship, Expectation and Genre:

- **Intention** – response depends on the perceived intention behind the use of the word and the way it is used, that is, the tone of delivery. Is the use derogatory, aggressive, accidental, a slip of the tongue, or is it part of everyday speech with no perceived anger or offensive intention? The strength of effect of the word can vary depending on the delivery. For example, the accidental live broadcast of strong language used by an emotional Jenson Button after he came third in the Abu Dhabi Grand Prix on 1 November 2009 was considered less offensive than a calculated use of the word might have been.

“For me it’s not just what’s being said but the intent with what’s behind it, what situation, the context the swear word is being used in.”

(Female, 18-34, Newcastle)

“If the swearing is aimed at someone then it’s worse than if it’s just used for effect.”

(Male, 16-17, Manchester)

- **Relationship** – response depends on the relationship between the people and the context in which the word is used. What is the balance of power between the protagonists? Is there a “defenceless victim”? A clip of an American comedian referring to two of a politician’s children as *retards* was universally condemned and all agreed it should not be tolerated by the Guidelines. By contrast, many found a provocative line of questioning of Gwyneth Paltrow by Jonathan Ross humorous and acceptable for broadcast because of Paltrow’s acquiescence. (See appendix for details of stimulus clips.)

“It’s fine... It was said in a comical manner...”

(Male, 25-54, Exeter)

- **Expectation** – response depends on the audience's expectation of the person using the word or the context of the use of the word. Billy Connolly, for example, is known for strong language and this would be factored into audiences' decisions. Similarly, colourful language might be more likely from the crowd in a football match and might be expected to make a portrayal realistic and authentic.

"It's kinda acceptable because he's not directing it at anyone but it's just a general representation of the world in that era... It's acceptable because that's what it's like."

(Male, 25-54, Exeter)

- **Genre** – response depends on the genre of the programme or content. Strong language can to an extent be neutralised in a factual piece such as a debate or documentary, where the word might be reported on or examined as a phenomenon. However, its use in a comedy may risk endorsing the word and have the effect of normalising it.

"... using comedy to define standards is a personal interpretation. A person's belief of what is funny or not is too vague."

(Female, 18-34, Newcastle)

"I find it in comedy shows more than anything. There's no need for so much 'effing and blinding'. Once in maybe five sketches yes, but not every other word – which happens a lot in comedy shows at present. Michael McIntyre comes on, he doesn't swear at all. He gets a guest on and then every other word's an 'eff' or 'blind'. I don't like that, I just switch it off; no need."

(Male, 55-70, Exeter)

The importance of context became particularly apparent on review of a clip from *Fiona's Story*, a serious drama that was broadcast post-watershed and included very strong language. (See appendix for details of stimulus clips. This clip was not shown to teenagers.) Most respondents considered the strong language justified for heightening the visceral emotion of the scene and presenting a realistic portrayal. Some, though, remained uncomfortable with the strong word used, despite acknowledging others' acceptance of its use. Others were less concerned about the word itself but were unconvinced the language represented a realistic portrayal of a middle class family and argued that alternative words could have been used.

6.4 Live broadcast

Live broadcast was raised spontaneously several times as a tricky area for the Guidelines. Some questioned whether the BBC should be held responsible for the

language and behaviour of others, considering live broadcast to be a case that absolves the BBC of responsibility for transgressions of the Guidelines. Underlying this position was a desire not to prevent live broadcast.

"What about a football crowd chanting 'the referee's a wanker!'"

(Male, 55-70, Cardiff)

"If it's live there's nothing you can do about it."

(Male, 18-34, Newcastle)

However, others suggested ways to uphold standards. They argued that measures should be put in place to ensure exceptions need not be made for live broadcast. They suggested that live broadcast could have a time delay built in to allow editing out or bleeping of offensive language. Moreover, they felt that the risk associated with the event to be broadcast should also be assessed. Producers, editors and presenters should, for example, consider the reputation of the pop star and have an inkling of what could happen. The swearing by Madonna at Live 8 in the clip shown was generally considered unacceptable (See appendix for details of stimulus clips.)

"Live shows are not vetted enough before being aired."

(Male, 55-70, Manchester)

6.5 Strong language

Please note that this section of the report contains very strong and potentially offensive language.

The language sections of the Guidelines on Harm and Offence make frequent reference to strong language. It was apparent in the research that the term is broad and encompasses several ideas that respondents intuitively wanted to unpack. This research did not set out to classify strong language and collect a compendium, but a passage of the Guidelines does contain a list of what are termed the *strongest words*. (See appendix for details of stimulus clips. Note that this section of the Guidelines was not shown to teenagers.)

Though undoubtedly context, as previously explained, can determine the acceptability of a word, there is also a scale of acceptability. There was widespread agreement with specifying the strongest words and including the list in the Guidelines. (One respondent suggested the inclusion of *twat* in the list.) However, within this group, *fuck* and its derivatives was considered by many to be less unacceptable and not as strong as *cunt*. The latter was considered offensive by many, especially women (of all ages) and older men. Some believed it should never

be broadcast or used online, although the *Fiona's Story* clip illustrated the exceptional circumstances when it might be justifiable (notwithstanding that some did not accept this clip presented a justified use of the word). Some considered use of these strongest words to have become too prevalent and they wanted their use to be reined in.

Milder strong language – described by respondents as swear words – were considered by most to be acceptable, or at least tolerable, depending on their use and context. If not directed with malice and not used gratuitously they could be acceptable. Many (especially those of lower social grades) considered that such language is a reflection of real life and would be necessary for true to life portrayal. This was all considered rightly captured by the Guidelines.

Other words were considered to be very offensive and largely unacceptable by many (though not all), but they do not have the same explicit reference in the Guidelines. Racist words and other terms of abuse (such as pejorative references to disability) were considered unacceptable by many, although again context might justify their use. For example, an investigation of racism in a documentary might need to include mention of racist words. The words *Paki* and *nigger* were widely considered taboo, especially among younger people for whom it is an axiom that racism is unacceptable. So strong was the feeling about these words that in one discussion the word was written down rather than spoken by one of the respondents. It was notable, though, that there was slightly greater tolerance for these terms among older men.

Interestingly, pejorative references to sexuality were generally not remarked upon and there was greater tolerance of the comments in the clips. (See appendix for details of stimulus clips.)

It was noticed by several respondents that the Guidelines make one use of the term *offensive language* whereas elsewhere the term used is *strong language*. It was suggested that the former might be a better term because it can encompass racist and other abusive words. They are not really captured by *strong language*.

6.6 Discriminatory views

There were two schools of thought about broadcasting strong language and content in relation to discriminatory views. A minority did not want such material to be broadcast for fear of causing offence. It did not want to risk endorsing bigoted views, desensitising people to the issues and perpetuating the harm. Instead, they wanted to protect people, especially the vulnerable and the minorities likely to suffer.

"It can go the other way... Someone who's not racist like a child might start saying these things if they see it on TV... It might influence them."

(Female Muslim, Leicester)

However, most argued that it is better to expose views, to reveal stupidity and ignorance and encourage bigoted views to be challenged. They considered a censoring approach a little patronising.

"In this country there is racism and they hide it. They don't express it. I feel good when they show it on dramas."

(Female Muslim, Leicester)

6.7 Bleeping

Bleeping was raised spontaneously several times and reactions were virtually consistent. Generally, bleeping is disliked. It can disturb the enjoyment of a programme. It can even be counterproductive because it tends to draw attention to the point being obscured, provoking some children to ask about the bleeped words. Most (including teenagers) want it kept to a minimum. Some wondered whether it could be avoided by editing out the offending words instead.

Though some were unconvinced that bleeping can thoroughly obscure the offending words, there was acknowledgement that on occasion it can be necessary, and there was approval of the requirement included in the Guideline to thoroughly obscure movement of the lips as well as the sound.

"They need to make sure you can't see or part-hear what they're saying."

(Female, 13-14, Huntingdon)

6.8 Intimidation and humiliation

There was broad support for the points in the Guidelines about intimidation and humiliation. Many pointed out that humiliation has become more common on television as a form of entertainment but most felt that people participating in these programmes were aware of the format and what they were letting themselves in for.

Humiliation and intimidation were acknowledged as part of real life and therefore, like strong language, acceptable if carefully considered. In the clip from *The Apprentice* (see appendix for details of stimulus clips) the behaviour and strong language of the aggressor were considered acceptable to broadcast, because they reveal the intense

emotions afflicting the contestants. Indeed, rather than provoking discomfort among respondents, most felt the clip instead exposed the aggressor.

"You expect this in a programme like The Apprentice. They're all stressed and he made himself look like an idiot."

(Male, 25-54, Exeter)

"They know what they're letting themselves in for so why not?"

(Female, 15-16, Manchester)

Some suggested *bullying* would be a useful word to include alongside the others in the section on Intimidation and Humiliation.

6.9 Portrayal

Few found anything with which to disagree in the section on portrayal, although some were a little dismissive of what appeared to them to be a box-ticking exercise in the passage that runs: *references to disability, age, sexual orientation, faith, race, etc may be relevant to portrayal*. For these few, the long list seemed to be an imposition, part of the "corrosive force" of political correctness. They were concerned that the effect should not be to divert all attention away from the mainstream towards minorities and minority interests. On the whole they were content for the need to be sensitive rather than to feature minority perspectives.

"Who makes it editorially justified? It's a very difficult caveat to follow."

(Male, 55-70, Manchester)

"If you're exaggerating something for comic effect it could be offensive."

(Male, 55-70, Manchester)

Amongst those in the minority groups (and indeed most of the sample) there was approval of the aim of reflecting fully and fairly all of the United Kingdom's people and cultures in BBC services in order for every group to be visible and to be portrayed in rounded representations that go beyond mere tokenism. There was acceptance of the balance of allowing disadvantage to be reflected but not perpetuated. On the whole, the various minority groups in this research did not call for special treatment; rather, they wanted to have a more rounded portrayal of themselves in the BBC's output. For example, the gay respondents were unconcerned by the portrayal of a lesbian couple in *The Most Annoying People of 2008*, but were less happy about the exaggerated gay stereotyping of Will Young by Chris Moyles because they considered the duration of the comments disproportionate to comic intent. (See appendix for details of stimulus clips.)

"This pissed me off. It was quite derogatory. If Will Young was there, then fine. It went too far."

(Gay Male, Manchester)

Stereotyping was considered a difficult judgement call in relation to humour. For example, many found the clip of the *Little Britain* incontinence sketch to be on the borderline of acceptability, although the discomfort was perhaps exacerbated by the nature of the sketch with its depiction of bodily functions. (See appendix for details of stimulus clips.)

"I'm slightly ashamed of myself that I laughed at it and that's the way you look at it. Is it really that funny?"

(Male, 55-70, Manchester)

"I think it could be offensive to older people."

(Female Muslim, Leicester)

"[It's] crude and not funny."

(Female, 55-70, Exeter)

"It's Little Britain so you know what to expect, so you don't have to watch it."

(Male, 55-70, Manchester)

There was greatest concern about derogatory portrayals of people deemed unable to defend themselves.

"It does appear to protect and respect vulnerable persons in our society: 'Strong language, intimidation and humiliation should not be used gratuitously and only for entertainment'."

(Female, 35-54, Glasgow)

"Those who are weak who have no protectors... people who are on the fringes of society.... It might do no harm to keep in mind people who are unable to speak for themselves."

(Rector, Belfast)

"Lack of understanding around mental health... You need to research really carefully... If you're experiencing a mental health problem and you're not properly medicated or it's not properly diagnosed it can send you over the edge... I don't think people realise how vulnerable the people we work with are and even though storylines seem far-fetched actually they're not."

(Social worker, London)

7 Draft Guidelines on Accuracy

This section presents reactions to the draft Guidelines on Accuracy. It begins by examining reactions to and expectations of accuracy, and then continues with the aid of illustrations from the clips that were shown, which helped uncover more nuanced responses and opened up new areas. Interestingly, views across the sample were more or less consistent.

7.1 Expectations of accuracy

Accuracy was considered a fundamental requirement of the BBC and many thought about it in absolute terms. Many wanted the Guidelines to aim for "right and wrong", and the clips that were shown seemed to reinforce this view at first. They wanted the BBC to be correct in all its output as a matter of principle: this befitted their high expectations of the BBC and is foundational to trust. Some emphasised the importance of accuracy because of the educational role the BBC plays.

A clip of a Radio 4 report on the 60th anniversary of the foundation of Israel was illuminating in the discussions. (See appendix for details of stimulus clips.) The piece, which referred to the number of Palestinian towns and villages destroyed (believed to be in the region of 350-500), used the word *scores*. The word was considered misleading by those who knew it to be a synonym for twenty – and by most when the word was defined – if the correct number is in the hundreds. Respondents considered the draft Guidelines supported this view.

"If you know how many people were killed why don't you just use the number rather than the slang? Say 300 or 500 or whatever..."

(Male, 55-70, Manchester)

"It's not accurate enough – because it's people's lives"

(Female, 35-54, Glasgow)

The clip highlighted the need for extra care in reporting on controversial topics (in hand with the need for impartiality). It also revealed the difficulty of achieving absolute accuracy all the time and encouraged a more nuanced view, though most did not want to diminish the importance of striving for the goal of absolute accuracy. While, on consideration, most appreciated that complete accuracy can be problematic, they considered the highest level of accuracy should be striven for in news, and accuracy should be an important aim in other factual content.

A minority of the sample took a more pragmatic stance from the outset, which they felt the discussion of the clips vindicated. All agreed that accuracy is more important in factual content, such as news, current affairs coverage and scientific or educational pieces. Accuracy was also considered to be important if pivotal to a narrative (such as the portrayal of a hospital in a medical drama) and in cultural portrayals (e.g. presenting a Muslim in a turban would be inaccurate).

There was some recognition, though, of the need to balance accuracy with the importance of the issue and how onerous delivering a greater degree of accuracy might be to less important issues. Generally, accuracy was considered of less relevance to non-factual content. There should be more flexibility in drama and light entertainment. Drama was considered to be bound by its own internal rules – some referred to the notion of “dramatic licence”. In these areas, the need for accuracy was considered less significant; it would not be an issue if there were no detrimental consequences from a relaxed approach. Some pointed out examples of inaccuracies that they had noticed in the past with amusement: beer cans spotted in a period drama; flowers seen wilting in a vase in one scene and later appearing fresh. None of these was considered significant or serious.

This view was supported by the reactions to the *Sun, Sea and Bargain Spotting* clip (in which one of those purchasing an item from a contestant was not disclosed as being a cameraman; see appendix for details of stimulus clips). Very few were concerned by this and most felt the Guidelines need not pay special attention to such cases.

“If it was a factual thing, it would be different, but it’s a bit light hearted...”
(Male, 55-70, Manchester)

However, a few respondents took a principled stance and were aggrieved by being misled. They were clear that the Guidelines should not allow material that knowingly misleads the audience.⁹

7.2 Accuracy in other areas

The clips further teased out two areas of expectation that were felt to be inadequately addressed by the draft Guidelines: scientific language and visual communication.

⁹ The Editorial Guidelines state that the BBC must not knowingly and materially mislead its audiences. Source: draft Editorial Guidelines, Section 3.2.

"It doesn't really cover anything about images, does it?"

(Female, 35-44, Manchester)

Numbers and percentages carry an aura of scientific authority, precision and certainty. Most respondents wanted to take them at face value. They asserted that scientific facts presented in these terms should be indisputable – either right or wrong. This was revealed by reactions to a clip from a programme about the splitting of the atom, in which the atom was described as being "split in two equal parts" which is not strictly correct. (See appendix for details of stimulus clips.) While few thought the semantics of this clip of great importance, they nevertheless felt uncomfortable about the idea of scientific information not being correct when expressed in precise terms.

"If you don't know an actual figure then you shouldn't quote one, such as 'two equal halves'. Should say 'two parts' – don't need to give the exact detail of how the parts break down."

(Female, 18-34, Newcastle)

"If I saw that clip about the atom being split in two and then I got asked that question on Who Wants to be a Millionaire and I got it wrong, then I'd sue!"

(Male, 14-15, London)

The other area of concern related to visual images and was elicited by a clip from a *Panorama* programme on a new wave of opencast coal mining in which a point about carbon dioxide emission is accompanied by dramatic images of a power station. (See appendix for details of stimulus clips.) It was clear that visual images can contribute to the meaning of a story at an implicit level and can do so with strong emotional effect. In the clip, which included images of water-coolers emitting steam, few understood what they were seeing and many thought they were seeing carbon dioxide. When this misunderstanding was pointed out most felt deceived. Some even claimed that, to an extent, it undermined the climate change argument. They pointed out the need for extra care with controversial topics.

"When you're talking about coal, you expect smoke, not steam!"

(Male, 55-70, Manchester)

"I thought it was smoke. I thought it was causing pollution."

(Female, 35-54, Glasgow)

"It does matter. I wasn't given the right facts. They're misleading me."

(Female, 35-54, Glasgow)

Although the concept of *due accuracy* was not immediately clear to all, the sentiment was appreciated and the examples presented in the clips helped introduce the concept, which was supported. Most agreed a higher threshold of accuracy is required where some consequence might ensue. Some infringements were considered to matter more than others.

There was approval of prioritising *due accuracy* over speed in the draft Guidelines. It was pointed out that speed is not unimportant, just less important than accuracy. Everyone wanted to be able to have faith in the accuracy of the BBC's output, particularly its news reporting. They wanted the BBC to avoid speculation and the need for retractions.

They also appreciated the need, made explicit in the Guidelines, to acknowledge serious factual errors. The view was that mistakes can happen but they should be acknowledged and where possible made good. Most also believed that when necessary lessons should be learnt.

"They strive to get things correct. Problem is mistakes will happen. [It's fine] as long as they are genuine and not out to con the viewer."

(Female, 35-54, Glasgow)

All these points in the draft Guidelines were appreciated and received general approval.

8 Draft Guidelines on impartiality

This section presents reactions to the draft Guidelines on Impartiality, starting with the understanding and expectations of impartiality. Personal views and professional judgements are considered, with the illumination of more clips, before some comments are made about perceptions of the BBC's performance on impartiality. As with Accuracy, there was no discernible pattern of variation in response across the sample.

8.1 Expectations of impartiality

The third of the draft Guidelines to be examined was the most difficult for many at first. Impartiality proved to be a complex concept. It did not seem as "black and white" as Accuracy had first seemed, and was also not as immediate as Harm and Offence. This was not helped by the term itself not being familiar to everyone (including most of the teenagers).

For those who did not know the word, the concept was introduced through a discussion of bias. All agreed on the need to pay attention to bias and, by extension, considered impartiality to be important for the BBC, meriting its place in the Guidelines. Indeed, for some, Impartiality (with Accuracy) was considered more important than the issues covered in Harm and Offence.

"It's a fundamental requirement."

(Male, 35-54, London)

"I'd say impartiality is much more important than offensiveness. If stuff is biased you may not realise it... you're getting into brainwashing and dictatorship!"

(Male, 35-54, Londonderry)

"I think impartiality is more important because they can influence other people's opinions."

(Female, 15-16, Londonderry)

Overall, the Guidelines on Impartiality were thought to be comprehensive and there were no significant omissions detected. Moreover, many felt the BBC is generally doing a good job on impartiality, particularly within a news context, with just a few exceptions, which will be discussed in due course.

Generally, there was a belief that all cases should be treated equally, though context was clearly a factor in the consideration of impartiality. Like the consideration of accuracy, impartiality was deemed of greater relevance to factual content, especially news reporting. All agreed on the need to present an impartial case in factual content by avoiding bias and distinguishing between fact and opinion. In debates there should be a range of views presented.

These views were reinforced by the episode of *Question Time* that included the BNP's Nick Griffin on the panel (October 2009) – which was mentioned spontaneously in many of the discussions. While it was seen that the fact of Nick Griffin's inclusion on the panel might have been a demonstration of the BBC's impartiality, for many this was obscured by the perceived bias in the way in which the debate was conducted.

"When they got Nick Griffin on, they had justification through their mandate. He got two MPs elected in the last European elections so he has to be invited on. But the format of the programme was odd when you see they all just ganged up on him."

(Male, 35-54, Londonderry)

"It would have been better to let him speak and show how ignorant he is rather than being shouted down all the time. He never had a chance to say what he wanted to say, so you never had a chance to really form an opinion of his attitude."

(Male, 55-70, Glasgow)

By contrast, a clip showing another edition of *Question Time* with Kelvin MacKenzie expressing his view that "Scots like spending our money rather than saving it" was considered acceptable as a more regular, if robust, example of the debate format – even by those who disliked Kelvin MacKenzie's views. The rebuke by another panellist, Chuka Umunna of the think-tank Compass, and the comments by the chairman David Dimbleby, provided a counterpoint to help maintain the neutrality of the format. (See appendix for details of stimulus clips.)

Impartiality was considered particularly important for controversial topics and most approved of the points covered in the draft Guidelines. As with the discussion of accuracy, this led to agreement with the concepts of *due impartiality* and *due weight*. The 'due' differs by content and context.

8.2 Opinions

Opinions and points of view are all valued and considered vital parts of the BBC's output. They are integral to debate and the interpretation of issues, and most people wanted them to be permitted by the Guidelines. The distinction between personal views and professional judgements was not clear to all, though this did not cause any concern and the inclusion of both in the draft Guidelines was widely supported.

"An interviewer will sometimes use a slant or opinion to help get a more appropriate response and that is fine."

(Female, 18-34, Cardiff)

8.3 Personal views

Personal views were considered important and can add value through their richness and range of perspectives. It was pointed out that they are essential to debates. However, they should be clearly identified and signposted, be it by the format of the programme or with the use of phrases such as "in my opinion...".

This was borne out by the clip of the programme *Sunday Schools – Reading, Writing and Redemption* presented by Huw Edwards. In this clip, Huw Edwards appears to be advocating Sunday Schools. Despite being a well known BBC news presenter, most felt that this should be allowed by the Guidelines because he clearly qualifies his view by saying "in my opinion...". (See appendix for details of stimulus clips.)

"You've got to listen to different views."

(Male, 55-70, Glasgow)

"He had the research to back it up."

(Female, 35-54, Glasgow)

As with the other Guidelines, it was felt that the context of the programme or content is an important factor. It was widely felt that there is more scope in non-news content, while extra care is needed for controversial topics (such as the Middle East). There was approval that this latter point is explicitly addressed in the draft Guidelines. In all of this everyone considered it important to avoid the appearance of the BBC expressing an opinion.

8.4 Professional judgements

Professional judgements can be contentious and this area was evidently more complex than personal views. Professional judgements are imbued with the authority

of the BBC and therefore are more readily received uncritically. They occupy territory that seems to be closer to factual reporting. However, even within news, which was viewed as demanding the reporting of facts, many expressed their interest in and acceptance of the professional judgements of specialist BBC correspondents such as Nick Robinson as long as facts and opinions are differentiated.

"Sometimes journalists know things we don't and they try to give us a subliminal message by what they say and that's important."

(Male, 35-54, Londonderry)

"There's no reason at all why the BBC shouldn't provide opinion, but you should have separate opinions [from news]..."

(Rabbi, London)

Some wanted the Guidelines to discourage or at least signpost such judgements. They were wary of the power of a large media organisation to sway people.

"Professional opinion is often still personal opinion, but you may believe it more, so this needs careful control."

(Female, eco/alternative lifestyle, South West)

"It might lead you to think in their way... They're right to have that Guideline."

(Female, 15-16, Londonderry)

"If they [newsreaders] are not controlled then people might get confused with the truth."

(Female, 13-14, Huntingdon)

A few commented that Guidelines should extend to body language and facial expressions.

"A person may not express any opinion but he can show his feelings in a subtle way to the whole world."

(Imam, Leicester)

"I'm sure they [newsreaders] feel very strong about some things they are reading but they have to stay blank."

(Male, 55-70, Manchester)

The medium itself and the format also have an effect. Many felt there should be a greater onus on impartiality in mainstream broadcast, on programmes such as the *BBC News at Ten*, which provides a record of the news and carries the authority of

the BBC. Several thought there should be more freedom on a correspondent's blog, which would be more likely to be visited by someone seeking a point of view.

Analysis, commentary and interpretation are expected from BBC journalists, but, as professional judgements, they require more care than personal views. On consideration, most respondents approved of covering the two separately in the draft Guidelines.

8.5 Impartiality in practice

A few respondents believed the BBC has become less impartial over recent years. Some in more rural areas pointed to the coverage of fox hunting; some in Northern Ireland detected a pro-Government bias; and some considered the BBC not to be impartial in its reporting of Israel/Palestine news. On these issues there were questions raised about professional judgements straying into personal opinion territory. However, others pointed out that it is difficult for the audience to be neutral and to pass judgement on the BBC's impartiality on an issue in which one is personally committed to one side of the debate.

"It's impossible to be 100% on the fence; you have to say something that's a bit one way or the other, that's just life... It's impossible..."

(Male, 55-70, Manchester)

"I do [think the BBC is neutral], especially when it comes to political things because of the format of their political programmes. If they get anybody on they always get someone from the other side with an alternative view and give them equal air time."

(Male, 35-54, Londonderry)

Regardless, this reinforced the importance of the Guidelines, which for the most part were considered to be working well.

"If these Guidelines are being used to produce the content then they're doing a good job!"

(Male, 55-70, Manchester)

9 Conclusions

There was virtually no awareness of Editorial Guidelines, but on consideration there was little surprise that they exist and generally they were thought to be necessary, particularly for the protection of children, young people and other vulnerable people. The draft Guidelines themselves were broadly welcomed, though their unfamiliar language and legalistic phrasing caused some to wonder how easy they would be to use, raising some concerns about their implementation and fears about possible loopholes. Furthermore, a few respondents were wary of what they regarded as the imposition of outmoded values and the interference of authority.

There was a noticeable generation gap, with the oldest finding more that offends them right across the media and society at large. Some wanted the Guidelines to assert high moral standards. Some were less concerned with the principle that all members of society should have respect for one another irrespective of socio-cultural differences.

Although the draft Guidelines on Harm and Offence are more accessible and emotive, on reflection most considered the Guidelines on Accuracy and Impartiality more important. The watershed was the most salient aspect of the Editorial Guidelines, though there was concern about its effectiveness amidst on-demand content and personal devices, and many feared its erosion.

Alongside the watershed, signposting was welcomed as a useful way to resolve the tensions between protection and freedom of expression. There was a preference to avoiding bleeping, either by leaving content unaltered or by editing it, but acceptance that on occasion it can be necessary. Most believed only gratuitously offensive or harmful content should not be broadcast or put online, and this generally related to racism and unwarranted abuse.

There was broad support for the points in the draft Guidelines about intimidation and humiliation and general agreement with the points about portrayal. The latter was of particular concern to many people from minority groups.

Few at first appreciated the nuance that accuracy is more than a matter of right and wrong, but on consideration the point was understood and accepted; almost all agreed that it was more significant for news and factual content. There was near consensus on the importance of both the Accuracy and Impartiality draft Guidelines and agreement with what they contain, though some considered the accuracy of scientific and visual communication warranted emphasis in the Guidelines.

Although the word *impartiality* was not known by all, the concept was appreciated in terms of bias. A few considered the BBC's impartiality to be slipping, though others considered this perception to be a factor of the personal views of various sections of the audience.

Similarly, the terms *due accuracy* and *due impartiality* were not understood by all at first, but the concepts were supported, as was *due weight* within the Impartiality Guideline. There was also support for the inclusion of both *personal views* and *professional judgements* in BBC output and approval of both being included in the Guidelines, but the latter were considered less clear-cut and would require greater care in practice.

10 Appendices

10.1 Sample detail

Main and reconvened groups

RECON- VENED	MAIN	LOCATION	AGE	SEX	SEG	ETHNICITY	BBC APPROVAL
-	1	Belfast	18-34	M/F	Mix	White	High/medium
1	2	Londonderry	35-54	M/F	Mix	White	Low/medium
2	3	Cardiff	55-70	M	C2DE	Mix	Low/medium
	4	Cardiff	18-34	F	ABC1	Mix	High/medium
3	5	Glasgow	35-54	F	Mix	Mix	High/medium
	6	Glasgow	55-70	M	C2DE	Mix	Low/medium
4	7	Newcastle	35-54	M/F	Mix	Mix	Low/medium
	8	Newcastle	18-34	M/F	ABC1	Mix	High/medium
5	9	Manchester	35-54	F	C2DE	Mix	Low/medium
	10	Manchester	55-70	M	ABC1	Mix	High/medium
6	11	Leicester	35-54	F	Mix	Hindu/Sikh	High/medium
	12	Leicester	18-34	M	Mix	Hindu/Sikh	Low/medium
7	13	Exeter	55-70	M/F	Mix	Mix	High/medium
	14	Exeter	25-54	M/F	Mix	Mix	Low/medium
8	15	London	18-34	M/F	ABC1	Mix	High/medium
	16	London	35-54	M/F	C2DE	Mix	Low/medium

Immersion

1	Afro-Caribbean Christian group	London
2	Pakistani Muslim group	Leicester
3	Eco/alternative lifestyle group	South West
4	Travellers group	South East
5	Transgender & transvestite group	London
6	Gay (m/f) group	Manchester
7	Blind/visually impaired group	London
8	Deaf/hard of hearing group	London

Depths with community leaders

1	Catholic priest	Belfast
2	Rector	Belfast
3	Imam	Leicester
4	Rabbi	London
5	Social worker	Glasgow
6	Social worker	London

Sessions with teenagers

	LOCATION	SCHOOL YEAR	AGE	SEX	SEG
1	Huntingdon (Cambridgeshire)	Year 9	13-14	F	BC1
2	London (outer)	Year 10	14-15	M	BC1
3	Manchester	Year 11	15-16	F	C2DE
4	Manchester	Year 12	16-17	M	C2DE
5	Cardiff	Year 9	13-14	F	C2DE
6	Glasgow	4 th (Year 10)	14-15	F	BC2D
7	Londonderry	6 th (Year 12)	15-16	F	BC1

10.2 Discussion guides

Main discussion guide for Harm and Offence

Discussion guide for groups on Harm and Offence

Notes to moderator:

- *The Guidelines might be difficult for some people, so we're approaching this research 'from the ground-up' – i.e. asking people to think about the principles before presenting extracts of the guidelines for comment. This should allow us to explore the themes addressed in the Guidelines without being too hindered by variable comprehension and engagement*
- *The initial group discussions will focus on language and behaviour; the reconvened groups will focus on accuracy and impartiality*
- *Remember that we're using the stimulus examples to interrogate the Guidelines; the stimulus is merely a means to this end and should not be critiqued for its own sake*
- *Remember that examples (from stimulus or respondents) deemed offensive might have been in breach of the Guidelines – i.e. the Guidelines per se might have been adequate*
- *Keep discussions focused on the areas of the Guidelines that we're researching – you can point to the list of 19 areas to bring the discussion back if necessary*
- *Try not to get side tracked about how the Guidelines are implemented*

1. INTRODUCTION TO THE RESEARCH PROCESS (5 mins)

- *Introduce researcher, Kantar Media*
- *Purpose of the discussion: we're doing this research for the BBC Trust, which is the body that oversees the BBC, and we're going to be talking about some of the things we asked you to think about*
- *About opinions, no right or wrong, opinions likely to vary*
- *Explain recording, viewing; explain confidentiality; mobile phones off/silent; duration <2h*
- *Any questions?*

2. WARM UP (5 mins)

- Respondents' individual introductions to the group
 - Name, family, occupation, hobbies/interests
 - How would a friend describe you?

Start discussion generally by asking about content across platforms – to ease people into conversation about their experiences and to get people closer to a media consumption frame of mind. Keep this brief

- *Let's think about TV – what programmes are you watching, what do you think of them, which are on the BBC*
- *Think about radio – what do you listen to, what do you think of it, what about from the BBC*
- *What about what the BBC does on its websites – what do you use, what do you think of it*

Moderator: throughout the discussion remember that we're concerned with all platforms

3. AWARENESS (5 mins)

- How do you think the BBC controls the quality of its programmes and what it puts online – for example, accuracy, the language that is used
 - *Look out for awareness of editorial guidelines*
 - *Note any spontaneous mention of the public consultation*
 - *Probe expectations*

Explain & note reactions:

The BBC has editorial guidelines that cover everything the BBC broadcasts and puts online. They're written by the BBC management (not by the Trust) and used by commissioners, writers, programme makers and editors. When complaints are made to the BBC they're used by the BBC management and Trust to judge whether content has been e.g. too offensive. They're not used outside the BBC e.g. by the courts. The guidelines are currently being reviewed; this research is part of that process.

Show summary of areas covered & note reactions. Refer to this summary if the discussions veer off course at any point

The editorial guidelines cover 19 areas. We're going to be thinking about 3 of them: Accuracy; Impartiality; Harm and Offence

4. PRE-TASK THOUGHTS ABOUT THEME (10 mins)

Show card with theme or write on flipchart (the theme set in the pre-task)

- Let's think about [strong language/aggressive behaviour]
- What were your thoughts about this in the task we set you (explore examples one by one)
 - Capture the illustration – identify the strong language / aggressive behaviour – note the programme, genre, channel, time
 - How did you feel about this
 - If you were making that programme/content, what would you have done differently, why
 - How do you think it affects other people (idea of accountability)
- After capturing the group's examples... how do you define [strong language/ aggressive behaviour] – what is it, what is it not
- How do you think this should relate to the BBC? Different standards? In what way, why

5. EXERCISE: RESPONDENT GENERATED PRINCIPLES (10 mins)

- What do you think should be the guidelines or 'rules' set for the BBC in relation to [strong language/aggressive behaviour]
 - Get spontaneous feedback from the group
 - Volunteer to write out on flipchart / post-its & flipchart
 - Encourage group to deliberate
- Challenge the group with themes (on scatterboards or showcards)
- Constrain prompts: what would you risk losing

6. REACTIONS TO GUIDELINES (15 mins)

[Strong/offensive & discriminatory language; Aggressive behaviour] (rotate)

These are not the full set of guidelines for these subjects but are the most important ones

- Hand out – read out if helpful – ask them to underline anything that's not clear, write any changes they'd like to make (or tick/cross & comment) – go through a page at a time
- Try looking at detail before moving to principles and intro (i.e. reverse order)
- Explore both the ideas/semantics and the words/phrases used to convey those ideas
- Note reactions
- As we review the guidelines, ask whether they're too relaxed or too restrictive – get them to imagine a scale
- If possible, get an annotated 'master copy' of the guidelines for the group (which may reflect differences of opinion)

Understanding of what's written

- How would you explain this to a friend, what would you say it means
- What's not clear, what could be better explained
- How would you change it, why? For clarity, to change the meaning/idea

Understanding of the principles/purpose (for BBC programme makers etc)

- What do you think about the idea of this being covered? Do they understand the need/role for editorial guidelines
- What do you think of what it covers
 - Agree with what is covered
 - Not onerous enough, what's missing
 - Too onerous, what's unnecessary
- Is this the right/appropriate standard to set, why
 - If not, what would you change, why
 - Too restrictive, not restrictive enough
- Probe balancing freedom of speech vs guidelines

7. STIMULUS CLIPS TO EXPLORE GUIDELINES (15 mins)

Show stimulus clips to explore, challenge, refine

- Refer to stimulus list/notes – range of material (platforms, genres, channels) tailored to group
- Before each piece, hand out paper for them to jot thoughts as the piece is played – and ask them to write down the reference code for the clip
- Once piece is played, open up to group to discuss
 - What issues are raised by the clip
 - How do the guidelines address what was shown
 - Explore whether about right / need tightening / too restrictive
- Ask group to think about these three points (write them on paper/flipchart) when discussing the clip:
 - a) If you were in charge of what the BBC broadcasts, would you show this?
 - b) What do the guidelines indicate to you?
 - c) Having seen this clip, what, if anything, would you change about the guidelines?
- If helpful, use temperature gauge / traffic lights tool to capture group's emotional response and signal shift to next clip
- Challenge re: the speaker/personality, the intended audience, tone/intention of the piece

8. MOVE ON TO THOUGHTS ABOUT OTHER THEME (5 mins)

Show card with theme or write on flipchart (the theme set in the pre-task)

- Let's think about [aggressive behaviour/strong language]
- How do you define [aggressive behaviour/strong language] – what is it, what not
 - Capture any examples
 - How did you feel about that
 - If you were making that programme/content, what would you have done differently, why
 - How do you think it affects other people (*idea of accountability*)
- How do you think this should relate to the BBC? Different standards? In what way, why

9. REPEAT SECTION 5 EXERCISE (RESPONDENT GENERATED PRINCIPLES) FOR OTHER THEME (5 mins)

10. REPEAT SECTION 6 (REACTIONS TO GUIDELINES) FOR OTHER THEME (15 mins)

11. REPEAT SECTION 7 STIMULUS (CLIPS TO EXPLORE GUIDELINES) (15 mins)

12. ACCURACY / IMPARTIALITY (10 mins)

- If there is time, introduce one of these (rotate) – present just the list of principles and explain there are fuller guidelines
- Capture reactions and feedback
- What do the terms *due accuracy / due impartiality* mean? Are they clearly explained
- Is this the right/appropriate standard to set, why
 - If not, what would you change, why
 - Too restrictive, not restrictive enough

13. SUM UP & CLOSE (5 mins)

Hand out self-completion exercise, explain that what they write won't be shared with group

- We've spent quite some time thinking about two issues covered by the editorial guidelines. If you were in charge what would you do – you might decide to keep them as they are written, you might change them in some way – please write your comments
- Any final comments

Collect self-completion exercise and all materials

Explain reconvened group & task

Thank and close

Main discussion guide for Accuracy and Impartiality

Discussion guide for reconvened groups on Accuracy and Impartiality

1. INTRODUCTION TO THE RESEARCH PROCESS (5 mins)

- *Introduce researcher, Kantar Media*
- *Purpose of the discussion: we're doing this research for the BBC Trust, which is the body that oversees the BBC. Following on from the last discussion we're going to look at some other areas of the guidelines, which we've asked you to think about in the pre-task*
- *About opinions, no right or wrong, opinions likely to vary*
- *Explain recording; explain confidentiality; mobile phones off/silent*
- *Mobile phones off/silent*
- *Duration 2 hours*
- *Any questions?*

Reminder for moderator/respondents:

The BBC has editorial guidelines that cover everything the BBC broadcasts and puts online. They're written by the BBC management (not by the Trust) and used by commissioners, writers, programme makers and editors. When complaints are made to the BBC they're used by the BBC management and Trust to judge whether content has been e.g. too offensive. They're not used outside the BBC e.g. by the courts. The Guidelines are currently being reviewed; this research is part of that process

2. WARM UP (10 mins)

- Respondents' individual introductions to the group
 - Name, family, hobbies/interests
- Remember that we're talking about the Editorial Guidelines for the BBC, and they apply to everything the BBC broadcasts and puts online – so we're talking about TV, radio and BBC websites
- Last time we discussed the Guidelines relating to Harm & Offence and we considered language, intimidation & humiliation and portrayal... you've had some time to think about this, who has any further thoughts? Explore any changed views

Show list of 19 areas covered by the editorial guidelines

- *Today we're going to look at the guidelines on Accuracy and Impartiality...*

The BBC Trust regulates the BBC for accuracy and impartiality. Ofcom does not regulate the BBC on these areas. The Royal Charter, which gives the BBC the right of broadcast, does set some rules here. They are not optional. They require BBC news to be duly accurate and duly impartial, and that controversial subjects in programmes about political controversy and policy and industrial disputes should also be duly accurate and duly impartial. The BBC sets itself a further standard: it requires all its content to be duly impartial and duly accurate. This is not required of any other broadcaster. So this is a very important area for the BBC to try and get right for licence fee payers.

Note to moderator: the term 'duly' is therefore not optional and cannot be changed

3. ACCURACY (45 mins)

- What comes to mind when thinking about accuracy, what does it mean
- How important do you feel accuracy is for TV/radio/websites from BBC, why? Can you give an example
- If you were to write the guidelines for the people who make BBC programmes/ websites, what would you want to cover – probe with prompt card: different points of view, controversial issues, checking/corroborating
- Can it vary by type of programme/content – entertainment (drama, comedy) vs factual (news, documentary)
- What might be the consequences of guidelines that are loose/relaxed, onerous

Explain that the Guidelines on Accuracy contain sections on: referrals, gathering materials, finding contributors, note-taking, avoiding misleading audiences, managing online content, checking programmes, correcting mistakes. We'll look at some extracts (not the full set of Guidelines)

Hand out extract of Guidelines. Ask them to tick/cross, underline anything unclear & comment – explore pertinent issues. Review a box/page at a time

Explore these points: audience expectation, controversial, authenticity, corroboration, attribution

- What do you think of what it covers? Is it strict enough, what's missing? Is it too strict, what's unnecessary?
- Check whether anything is unclear, what could be better explained
- What does the term *due accuracy* mean, is it clearly explained
- Is this the right/appropriate standard to set, why
- Would you change the guideline, how, why

Show stimulus clips to explore, challenge, refine

- Refer to stimulus list/notes
- Before each piece, hand out paper for them to jot down thoughts as the piece is played – and ask them to write down the reference code for the clip
- Once piece is played, open up to the group to discuss
- Ask the group to think about these three points (show on paper/flipchart):
 - a) If you were in charge of what the BBC broadcasts, would you show this?
 - b) What do the Guidelines indicate to you?
 - c) Having seen this clip, what, if anything, would you change about the Guidelines?

4. IMPARTIALITY (55 mins)

- What comes to mind when thinking about impartiality, what does it mean
- How important do you feel impartiality is for TV/radio/websites from BBC, why? Can you give an example
- If you were to write the guidelines for the people who make BBC programmes/ websites, what would you want to cover – probe with prompt card: different opinions, range of opinions, audience expectations, weight of coverage, controversial subjects
- Can it vary by type of programme/content – entertainment (drama, comedy) vs factual (news, documentary)
- What might be the consequences of guidelines that are loose/relaxed, onerous

Explain that the Guidelines on Impartiality contain sections on how to approach impartiality in different types of output. We'll look at some extracts (not the full set of Guidelines)
Hand out extract of Guidelines. Ask them to tick/cross, underline anything unclear & comment – explore pertinent issues. Review a box/page at a time

- What do you think of what it covers? Is it strict enough, what's missing? Is it too strict, what's unnecessary?
- Check whether anything is unclear, what could be better explained
- What does the term *due impartiality* mean, is it clearly explained
- Is this the right/appropriate standard to set, why
- Would you change the guideline, how, why

Show stimulus clips to explore, challenge, refine

- Refer to stimulus list/notes
- Before each piece, hand out paper for them to jot down thoughts as the piece is played – and ask them to write down the reference code for the clip
- Once piece is played, open up to the group to discuss
- Ask the group to think about these three points (show on paper/flipchart):
 - a) If you were in charge of what the BBC broadcasts, would you show this?
 - b) What do the guidelines indicate to you?
 - c) Having seen this clip, what, if anything, would you change about the guidelines?

- What do you think about personal views (e.g. "Thought for the Day" on the *Today Programme*, Radio 4) – what do the Guidelines indicate, have the Guidelines got it right
- What do you think about professional judgement pieces (e.g. Political Editor Nick Robinson making comments about a political story when making his report on the *News at Ten* or in his blog) – what do the Guidelines indicate, have the Guidelines got it right
 - Do they understand these concepts, and the distinction between 'personal views' and 'professional judgement pieces'
 - How do they feel about their inclusion in the Guidelines

5. SUM UP & CLOSE (5 mins)

Hand out self-completion exercise, explain that what they write won't be shared with group

- We've spent quite some time thinking about some of the issues covered by the editorial guidelines. Based on what you've read, overall what do you think of them – check for each: Accuracy, Impartiality
- What changes, if any, would you make
- Any final comments

*Collect self-completion exercise and all materials
Thank and close*

10.3 Extracts of draft Editorial Guidelines

Extracts of draft Guidelines on Harm and Offence

Please note that parts of the draft Guidelines on Harm and Offence necessarily contain strong and potentially offensive language.

Harm and Offence: Introduction

[source: Draft Editorial Guidelines, Section 5.1 – Harm and Offence: Introduction]

The BBC aims to reflect the world as it is, including all aspects of the human experience and the realities of the natural world. In doing so, we balance our right to broadcast innovative and challenging content, appropriate to each of our services, with our responsibility to protect the vulnerable and avoid unjustifiable offence.

Creative risk-taking is a vital part of the BBC's mission. However, in all our output, the greater the risk, the greater the thought, care and planning required to bring creative content to fruition. We must be sensitive to, and keep in touch with, generally accepted standards as well as our audiences' expectations of our content, particularly in relation to the protection of children. Audience expectations of our content usually vary according to the service on which it appears.

When our content includes challenging material that risks offending some of our audience we must always be able to demonstrate a clear editorial purpose, taking account of generally accepted standards, and ensure it is clearly signposted. Such challenging material may include, but is not limited to, strong language, violence, sex, sexual violence, humiliation, distress, violation of human dignity, and discriminatory treatment or language.

Harm and Offence: Principles

[source: Draft Editorial Guidelines, Sections 5.2.1-5.2.6 – Harm and Offence: Principles]

1. The BBC must apply generally accepted standards so as to provide adequate protection for members of the public from the inclusion of offensive and harmful material.
2. We must not broadcast material that might seriously impair the physical, mental or moral development of children.
3. We must observe the 9pm television watershed to ensure material that might be unsuitable for children is appropriately scheduled.
4. We must balance our responsibility to protect children and young people from unsuitable content with their rights to freedom of expression and freedom to receive information.
5. We must ensure our audiences have clear information on which to judge whether content is suitable for themselves or their children.
6. The use of strong language must be editorially justified and appropriately signposted to ensure it meets audience expectations, wherever it appears.

Harm and Offence: Language

[source: Draft Editorial Guidelines, Sections 5.4.20-5.4.25 – Harm and Offence: Language]

The effect of strong language depends on the choice of words, the speaker and the context. Different words cause different degrees of offence in different communities as well as in different parts of the world. A person's age, sex, education, employment, faith, nationality and where they live, may all have an impact on whether or not they might be offended.

However, the use of strong language must be editorially justified and appropriately signposted to ensure it meets audience expectations, wherever it appears.

Strong language is most likely to cause offence when it is used gratuitously and without editorial purpose, and when it includes:

- sexual swearwords
- terms of racist or ethnic abuse
- terms of sexual and sexist abuse or abuse referring to sexuality
- pejorative terms relating to illness or disabilities
- casual or derogatory use of holy names or religious words and especially in combination with other strong language.

Output controllers and programme or content producers should ensure that strong language, especially the strongest language, is subject to careful consideration and appropriate referral, to ensure it is editorially justified, before it is included in our output.

Context and tone are key to determining whether strong language will be acceptable or deemed unjustifiably offensive. We should consider the following:

- What language was used, who used it, to whom was it directed and why was it said
- How it was said. Was the tone angry or aggressive, or charming and funny? The same terms can be considered more or less offensive depending on the tone of the delivery and the character or personality who use the terms
- Where the content is to be found in the television and radio schedules or online
- The quality of challenging material, which includes strong language, is a significant factor in determining its acceptability or unacceptability to audiences. Strong language can be acceptable when authentic or used for clear purpose or effect within a programme, but audiences dislike careless use which has no editorial purpose.

We must not include any offensive language in:

- pre-school children's programmes or websites (for four years and under)
- programmes or websites made for younger children
- before the watershed or on radio when children are particularly likely to be in our audience or in online content likely to appeal to a significant proportion of children, unless it is justified by the context. Even then, frequent or careless use must be avoided.

Apart from the most exceptional circumstances, we must not include the strongest language before the watershed or on radio when children are particularly likely to be in our audience or in

online content likely to appeal to a significant proportion of children. We must also make careful judgements about the use of the strongest language post-watershed and ensure it is clearly signposted.

Any proposal to use the strongest language (cunt, motherfucker and fuck or its derivatives) must be referred to and approved by the relevant Output Controller, who should consider the editorial justification. Chief Adviser Editorial Policy may also be consulted.

In general, where strong language is integral to content and relevant questions of transmission slot and channel have been resolved, it should not be disguised. When a section of content is editorially justified but the slot, channel or context are not appropriate for strong language, it may be necessary to edit or bleep language, even post-watershed.

Language that is bleeped for pre-watershed content must be thoroughly obscured, taking care to ensure also that the bleeped words are not then made obvious by visible mouth movements.

Harm and Offence: Intimidation and Humiliation

[source: Draft Editorial Guidelines, Section 5.4.31 – Harm & Offence: Intimidation & Humiliation]

BBC content must respect human dignity. Intimidation, humiliation, intrusion, aggression and derogatory remarks are all aspects of human behaviour that may be discussed or included in BBC output. Some comedy can be cruel but unduly intimidating, humiliating, intrusive, aggressive or derogatory remarks must not be celebrated for the purposes of entertainment. Care should be taken that such comments and the tone in which they are delivered are proportionate to their target.

Harm and Offence: Portrayal

[source: Draft Editorial Guidelines, Sections 5.4.37-5.4.38 – Harm & Offence: Portrayal]

We aim to reflect fully and fairly all of the United Kingdom's people and cultures in our services. Content may reflect the prejudice and disadvantage which exists in our society but we should not perpetuate it. In some instances, references to disability, age, sexual orientation, faith, race, etc. may be relevant to portrayal. However, we should avoid careless or offensive stereotypical assumptions and people should only be described in such terms when editorially justified.

When it is within audience expectations, we may feature a portrayal or stereotype that has been exaggerated for comic effect, but we must be aware that audiences may find casual or purposeless stereotypes to be offensive.

Extracts of draft Guidelines on Accuracy

[source: Draft Editorial Guidelines, Section 1.2.2 – Editorial Values: Truth & Accuracy]

We seek to establish the truth of what has happened and are committed to achieving due accuracy in all our output. Accuracy is not simply a matter of getting facts right; when necessary, we will weigh relevant facts and information to get at the truth. Our output, as appropriate to its subject and nature, will be well sourced, based on sound evidence, thoroughly tested and presented in clear, precise language. We will strive to be honest and open about what we don't know and avoid unfounded speculation.

Introduction

[source: Draft Editorial Guidelines, Section 3.1 – Accuracy: Introduction]

The BBC is committed to achieving due accuracy. This commitment is fundamental to our reputation and the trust of audiences, which is the foundation of the BBC.

The term 'due' means that the accuracy must be adequate and appropriate to the output, taking account of the subject and nature of the content, the likely audience expectation and any signposting that may influence that expectation.

We strive to achieve due accuracy in all our output but its requirements may vary. The due accuracy required of, for example, drama, entertainment and comedy, will not usually be the same as for factual content. The requirements may even vary within a genre, so the due accuracy required of factual content may differ depending on whether it is, for example, factual entertainment, historical documentary, current affairs or news.

Accuracy is not simply a matter of getting facts right. If an issue is controversial, relevant opinions as well as facts may need to be

considered. When necessary, all the relevant facts and information should also be weighed to get at the truth.

Where appropriate to the output, we should:

- gather material using first hand sources wherever possible;
- check and cross check facts;
- validate the authenticity of documentary evidence and digital material;
- corroborate claims and allegations made by contributors wherever possible.

In news and current affairs content, achieving due accuracy is more important than speed.

Principles *[source: Draft Editorial Guidelines, Sections 3.2.1-3.2.4 – Accuracy: Principles]*

1. The BBC must do all it can to ensure that 'controversial subjects' are treated with due accuracy in all 'relevant output'.
2. All BBC output, as appropriate to its subject and nature, must be well sourced, based on sound evidence, thoroughly tested and presented in clear, precise language. We should be honest and open about what we don't know and avoid unfounded speculation. Claims, allegations, material facts and other content that cannot be corroborated should normally be attributed.
3. The BBC must not knowingly and materially mislead its audiences. We should not distort known facts, present invented material as fact or otherwise undermine our audiences' trust in our content.
4. We should normally acknowledge serious factual errors and correct them quickly, clearly and appropriately.

Extracts of draft Guidelines on Impartiality

[source: Draft Editorial Guidelines, Section 1.2.3 – Editorial Values: Impartiality and Diversity of Opinion]

Impartiality lies at the core of the BBC's commitment to its audiences. We will reflect a breadth and diversity of opinion across our output as a whole, over an appropriate period, so that no significant strand of thought is knowingly unreflected or under represented. We will do all we can to ensure that 'controversial subjects' are treated with due impartiality. We will be fair and open-minded when examining evidence and weighing material facts.

Introduction *[source: Draft Editorial Guidelines, Section 4.1 – Impartiality and Diversity of Opinion: Introduction]*

Impartiality means taking account of the breadth and range of views on a subject. It is often more than a simple matter of "balance" between opposing viewpoints. Instead it involves considering the broad perspective, ensuring that the existence of a range of views is appropriately reflected. It is the BBC's single most compelling and central characteristic, at the heart of public service, and should be embraced and celebrated as an asset.

The term 'due' means that the impartiality must be adequate and appropriate to the output, taking account of the subject and nature of the content, the likely audience expectation and any signposting that may influence that expectation.

Principles [source: Draft Editorial Guidelines, Section 4.2.1-4.2.6 – Impartiality and Diversity of Opinion: Principles]

1. The BBC must do all it can to ensure that 'controversial subjects' are treated with due impartiality in all 'relevant output'.
2. In addition, our commitment to due impartiality extends to 'controversial subjects' in all our output.
3. We seek to provide a broad range of subject matter and perspectives over an appropriate time scale across our output as a whole.
4. We are committed to reflecting a wide range of opinion across our output as a whole and over an appropriate timeframe so that no significant strand of thought is knowingly unreflected or under represented.
5. News in whatever form must be presented with due impartiality, giving due weight to events, opinion and main strands of argument.
6. We exercise our editorial freedom to produce content about any subject, at any point on the spectrum of debate, as long as there are good editorial reasons for doing so.

Controversial Subjects

[source: Draft Editorial Guidelines, Sections 4.4.3-4.4.4]

We must strive to achieve due impartiality on 'controversial subjects'. In determining whether subjects are controversial, we should take account of:

- the level of public and political contention and debate
- how topical the subjects are
- sensitivity in terms of relevant audiences' beliefs and culture
- whether the subjects are matters of intense debate or importance in a particular nation, region or discrete area likely to comprise at least a part of the audience
- a reasonable view on whether the subjects are serious
- the distinction between matters grounded in fact and those which are a matter of opinion.

Advice on whether subjects are controversial is available from Editorial Policy.

When dealing with 'controversial subjects', we must ensure a wide range of significant views and perspectives are given due weight and prominence, particularly when the controversy is active. Opinion should be clearly distinguished from fact.

Breadth and Diversity of Opinion

[source: Draft Editorial Guidelines, Sections 4.4.8-4.4.11]

To achieve impartiality, our output as a whole must give due weight to the many and diverse areas of an argument. Breadth and diversity of opinion may require not just a political and cultural range, but, on occasions, reflection of the variations between urban and rural, older and younger, poorer and wealthier, the innovative and the status quo, etc. It may involve exploration of perspectives in different communities, interest groups and geographic areas.

Due Weight

Impartiality does not require that the range of perspectives or opinions should be covered in equal proportions either across our output as a whole, or within a single programme, web page or item. Instead, we should seek to achieve 'due weight'. For example, minority views should not necessarily be given equal weight to the prevailing consensus.

Nevertheless, the omission of an important perspective, in a particular context, may jeopardise due impartiality and be regarded by parts of our audience as a demonstration of bias. Decisions over whether to include or omit perspectives should be reasonable and carefully reached, with consistently applied editorial judgement across an appropriate range of output.

News, Current Affairs and Factual Output

[source: Draft Editorial Guidelines, Section 4.4.13]

Presenters, reporters and correspondents are the public face and voice of the BBC - they can have a significant impact on perceptions of our impartiality. Journalists and presenters, including those in news and current affairs, may provide professional judgements, rooted in evidence, but may not express personal views on public policy, on matters of political or industrial controversy, or on 'controversial subjects' in any other area. Our audiences should not be able to tell from BBC programmes or other BBC output the personal prejudices of our journalists and presenters on such matters.

This applies as much to online content as it does to news bulletins: nothing should be written by journalists and presenters that would not be said on-air.

Personal View Content

[source: Draft Editorial Guidelines, Section 4.4.29]

The BBC has a tradition of allowing a wide range of individuals, groups or organisations to offer a personal view or opinion, express a belief, or advance a contentious argument in its output. This can range from the outright expression of highly partial views by a campaigner, to the opinion of a specialist or professional including an academic or scientist, to views expressed through contributions from our audiences. All of these can add to the public understanding and debate, especially when they allow our audience to hear fresh and original perspectives on familiar issues. Such personal view content must be clearly signposted to audiences in advance.

10.4 Stimulus clips

HARM & OFFENCE

Language

- *Friday Night with Jonathan Ross* (BBC One, 2.5.2008, 10:35pm), Gwyneth Paltrow interview (f-word)
- *Live 8* (BBC One, 2.7.05, pre-watershed), Madonna uses f-word
- Ron Atkinson (n-word), presented via *The Guardian* newspaper 22.4.2007
- *Fiona's Story* (BBC One, 31.8.2008 9pm), drama in which wife confronts husband about paedophile images on his computer and husband uses c-word
- *Breakfast* (BBC One, 24.9.2008), Nick Foulkes says Jesus Christ

Intimidation and humiliation

- *The Apprentice (Series one)* (BBC Two, 9pm April 2005), Saira Khan treated aggressively
- *Nemone* (BBC 6 Music, 12.9.2008, 1pm), interview with American comedian Doug Stanhope who comments on an American politician's children being "retarded"
- *Weakest Link* (BBC One 5.7.2008, 5pm), Anne Robinson says "shag"

Portrayal

- *Question Time* (BBC One, 11.10.2007, 10.35pm), Kelvin MacKenzie expressing his view that "Scots like spending our money rather than saving it"
- *The Most Annoying People of 2008* (BBC Three, 29.12.2008, late night), remarks made about Lindsay Lohan and Sam Ronson's relationship
- *Little Britain* (BBC Three), incontinent character recurring and first appeared in November 2005
- Chris Moyles (Radio 1, 20.1.2009 morning), impersonating Will Young
- *Graham Norton Show* (BBC Two, 15.3.2009, 10pm), with guest Ruth Jones, regarding lesbians
- *Friday Night with Jonathan Ross* (BBC One, 18.5.2007, 10.35pm), Eddie Izzard interview making a joke where he equates travellers with murderers
- *Top Gear* (BBC Two, 2.11.2008, 8pm), Jeremy Clarkson's comment: lorry drivers murder prostitutes
- *The One Show* (BBC One, 25.9.2009, 7pm), Pope reference

ACCURACY

- Item on the 60th anniversary of the creation of Israel (*Six O'Clock News*, Radio 4, 8.5.2008), not "scores" of Palestinian towns and villages destroyed but 350-500
- *Panorama* (BBC One, 1.12.2008), images of cooling towers steaming – not CO2 emission
- *Atom* (BBC Four, episode 2, 2.8.2007), atom is *not* "split into two equal parts"
- *Sun, Sea and Bargain Spotting* (BBC Two, 19.8.2009, 2.15pm), cameraman making a purchase but not explained that he is involved in the programme

IMPARTIALITY

- *Power & the People – Back to the Future* (BBC Two, 23.7.2007), presenter encourages people to vote in the Welsh Assembly election
- *This Week* (BBC One, 13.7.2006), Maureen Lipman view on Israeli action
- *Question Time* (BBC One, 22.10.2009), with Nick Griffin, BNP

Professional judgements

- *News at Ten* (BBC One, 3.10.2008), Nick Robinson on Peter Mandelson

Personal views

- *Sunday Schools – Reading, Writing & Redemption* (BBC Four, 3.7.2008), Huw Edwards on Sunday Schools