Taste, Standards and the BBC

Public attitudes to morality, values and behaviour in UK broadcasting

June 2009

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Preface

The BBC has a unique relationship with its audience - and audiences have high expectations of the BBC.

Occasionally we fall short of those expectations. Last year we apologised for remarks made in The Russell Brand Show on Radio 2, which were offensive. On that occasion our audiences were quick to let us know that we had fallen below the standards they expect.

The BBC took action to try to prevent a re-occurrence of anything similar. But this instance raised bigger and broader questions about public attitudes to broadcasting standards today; questions which the BBC had not investigated systematically for some time.

The BBC Trust asked the Executive to consider how the BBC should deal with questions of generally accepted standards in its output and report back to the Trust.   In response, the Director-General required senior programme executives across television, radio and editorial policy to explore the BBC's approach to questions of taste and standards within a fast-moving and diverse media landscape.

The group's thinking was led by Alan Yentob, Creative Director and Roly Keating, Director of Archive Content.

The BBC commissioned the most extensive piece of research it has ever undertaken in this area to find out what our audiences think about the standards we achieve and what we should aspire to. We asked Ipsos MORI to carry out a representative poll of public opinion and the research company Blinc to delve more deeply into audience attitudes through a series of focus groups and other discussions with the public. We also interviewed leading practitioners and asked them about their views and experiences.

The research, which is detailed in the pages that follow, offers a fascinating insight into the complexity of audience opinions about what we do, opinions which are as varied and diverse as the audiences we serve and which are never simply censorious.

The findings gives us a sophisticated insight into the question which confronts any creative organisation; how do we reconcile the impulse shared by all programme and content makers to explore creativity with the responsibility our audiences expect us to exercise as a public broadcaster answerable ultimately to them?

The answers are complex, and apply differently to different genres, to different performers and to different programmes. Our audiences applaud originality and

their attitudes to standards are highly dependent on the quality of our programming.

There are insights here for all of us. In the next few months we shall be sharing this new knowledge with all programme and content makers in both in-house and independent production. The thoughtful conclusions of this report and its recommendations will help to clarify and shape decision-making by the BBC; they will support creative boldness and enable us to present ideas which challenge and inspire our audiences.
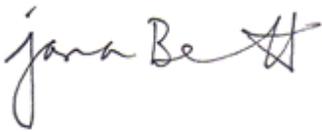
Jana Bennett   David Jordan
Director, Vision   Director, Editorial Policy and Standards

Introduction

For everyone involved, this has been a demanding and rewarding project. Few areas of broadcasting policy provoke more emotive responses and conflicting positions: in media commentary, and within the broadcasting community itself, strong divisions can arise and views will occasionally become entrenched, across the whole spectrum of opinion.

What we have sought to do here is put audiences at the heart of the debate, determining by their own thoughtful responses where broadcasters in general, and the BBC in particular, should stand on these questions.

In the research findings set out in the report there is significant diversity of views and perspective. Familiar differences between generations reappear, in sometimes unexpected forms. New themes and concerns emerge, some driven by the radical changes in media and technology of the last decade.

Through it all, a clear sense emerges of what audiences expect of the BBC. They very explicitly want the BBC to be different from other broadcasters, to be a benchmark of quality and trust in all its output; but not so different that it drifts apart from the currency of public attitudes and fails to reflect audiences honestly back to themselves. They value creative innovation and the strong talents and personalities who capture the nation's sometimes outrageous sense of humour; but value equally the tough judgement and control that keeps fundamental standards in place even when material is strong or challenging. They want and expect us to take a thoughtful and informed approach, with the courage to be accountable for the judgements we make on their behalf.

Specific insights emerge, captured in the recommendations that indicate where new processes can be introduced to ensure that the BBC takes even more care in decision-making where fine judgements of taste have to be made. One theme that comes through loud and clear is the vital importance of context and signposting: as the world of broadcasting becomes ever more time-shifted and on-demand, the need for clarity in content warnings and guidance becomes greater than ever.

The real value of this research, we believe, is in its long-term benefit to the BBC's relationship with its audiences. In their range and depth, the findings here give editorial professionals across the BBC – and the broadcasting industry as a whole – a closer and more detailed understanding of audience attitudes to these issues than they have ever had before. It is an approach which we believe should be repeated on a regular basis in years to come, in order to maintain the informed understanding that the BBC needs to allow creative innovation to flourish with confidence.

Executive Summary

Key findings from the new BBC research

1. Where audiences are concerned about the area of taste and morality on television as a whole, this is often connected with broader concerns about falling standards in terms of quality and the over-reliance on reality formats.

2. Standards of morality, values and behaviour in the media in particular are not a top-of-mind issue for the majority of the public.

3. The BBC overall performs well in the audience's perceptions of standards of morality, values and behaviour, compared to other channels and broadcasters. The audience also has higher expectations of the BBC.

4. In general terms, the public do not want increased censorship or regulation. The majority value the creativity of the BBC and accept that it may sometimes lead to offending some people.

5. When prompted, a significant proportion of the audience have various concerns about standards of morality, values and behaviour in the media as a whole, including newspapers, magazines, broadcasting and online content.

6. Strong language is an area of concern for some audiences; they recognise when language is used for clear purpose or effect within a programme - including comedy and entertainment - but dislike 'unnecessary' or excessive use.

7. In certain genres, the offensive potential of strong language can be compounded when it is combined with apparently aggressive or bullying behaviour. This reflects broader public concerns about aggression and bullying within society as a whole.

8. There is little public consensus or agreement about what constitutes *offence*: it means very different things to different sections of the audience.

9. The context in which potentially offensive content is placed is of paramount importance to audiences, as are judgements of quality. Both can make the difference between whether something is acceptable to audiences or not.

10. Tone and intent can also make strong material acceptable: the 'twinkle in the eye' of a performer and their skill in delivery can make the decisive difference, even with potentially offensive material.

11. Age and socio-economic group go some way to describing who in the audience is more likely to have concerns, but they do not tell the full story.

12. Younger audiences (11-15 year-olds) are uniquely self-selecting in their choice of media content, through the web and magazines as well as broadcast material. Though strongly drawn to more sexual content, some express unease about the sexualised nature of the media world in which they live and the pressure to 'grow up fast.'

13. Sexual content on television and radio was a matter of relatively low concern for audiences. There was an expectation that the television watershed should be respected, and content on radio appropriately scheduled. There is no appetite for a watershed in radio.

14. Some respondents commented that the transfer of some successful series from BBC Two may bring a somewhat 'edgier' tone to BBC One.

15. Respondents expressed few concerns about standards on BBC Radio. However, of all the BBC's services, Radio 1 has the most divided response in terms of morality, values and behaviour.

16. Audiences are conscious of the challenges presented by the growth of online and on-demand content, but there is little awareness of the BBC's 'G for Guidance' systems, or understanding that iPlayer has a parent password protection scheme which prevents children accessing adult content.

Our response to these findings is divided into conclusions – which underline or reinforce current practice in the light of the new research – and recommendations, which highlight specific areas for change.

Conclusions

1. Audiences accept potentially offensive content but believe it should be there for a purpose. They have a sophisticated sense of different programme genres, from serious documentary to reality and entertainment. Producers should ensure that any potentially offensive material has a clear editorial purpose and ask themselves is it necessary? Does it enhance the quality of the experience for audiences?

2. Viewers understand and value the television watershed. The BBC must respect and maintain its significance as a crucial contribution to audience confidence in television standards. There is no audience demand for a radio watershed.

3. Of all BBC services, BBC One is the most sensitive, because of its ability to unite generations and families in shared viewing. The bar for the strongest language between 9pm and 10pm must therefore remain significantly higher than on other BBC television channels.

4. On all channels, producers, presenters, commissioners and controllers have a shared responsibility to ensure that the force and value of the strongest words is not weakened by over-use. The mandatory referral of the most offensive language to Channel Controllers reflects this and must be maintained.

5. Mischievous banter, practical jokes and formats, which include elements of confrontation and criticism, can all be legitimate – indeed the public tell us that they can add greatly to their enjoyment; but programme makers, on-air artists and presenters must ensure that they never tip over into malice, humiliation or harm.

6. Audiences admire performers who take risks but have the expertise to know when to draw a line. To support such talent, producers and controllers must always be candid and open with them about judgements of tone and content, and be prepared where appropriate to take and enforce tough decisions.

7. Risk-taking is as vital a part of the BBC's mission in comedy, drama and entertainment as it is in other genres. As with all programme making, the greater the risk, the greater the thought, care and pre-planning needed to bring something groundbreaking to air.

Recommendations

1. **New series on television and radio**
   For new series where questions of taste and standards are likely to arise, there must be a discussion with the commissioning executive early in the production cycle to agree appropriate parameters of tone and content, to ensure that all involved – including presenters and performers – have given thought to questions of channel, context and slot. Even when a returning series has established expectations of strong language and content, there should be a similar discussion before the start of each run.

2. **Greater care over cross-channel transfers**
   When a TV series moves to a more mainstream channel - especially to BBC One - producers and controllers should be sensitive to its new context, and give careful consideration to adaptations of tone or format if necessary.

3. **Clearer policy on bleeping of strong language**
   A clearer policy should be set for the use of bleeping in TV and radio programmes. In general, where strong language is integral to the meaning or content of a programme – and other questions of slot, context channel etc have been resolved – it should not be disguised. But when in other circumstances a sequence that is editorially necessary happens to contain the strongest language, it may be right to bleep or disguise the words, even after the watershed.

4. **New guidance on malicious intrusion, intimidation and humiliation**
   BBC programmes must never condone malicious intrusion, intimidation and humiliation.   While they are all aspects of human behaviour which may need to be depicted, described or discussed across the BBC's factual and non-factual output, they must never be celebrated for the purposes of entertainment. New guidance is needed to ensure that everyone involved in programme making for the BBC understands that malicious intrusion, intimidation and humiliation are unacceptable.

5. **Clearer audience information and warnings**
   The BBC should always recognise that some sections of its audiences are more readily offended than others. We owe the public the information they need to make informed choices about viewing and listening and to avoid material they may regard as unsuitable for themselves or their families. Each channel must make even greater efforts to ensure that appropriate content information (eg. billings and presentation announcements) is provided which enables informed judgements to be made by all audiences, both pre- and post-watershed, about programme content.

6. **Music radio**
   Music radio thrives on strong personalities, and young audiences value BBC Radio 1 highly; but editorial teams must be reminded that particular care needs to be taken at times of day, such as school runs, when different generations may be listening together.

7. **Major awareness campaign about online guidance**
   The BBC has pioneered content guidance and child protection mechanisms provided by the iPlayer. Audiences are concerned about the internet as a space of unregulated content and are insufficiently aware of the protection available for BBC content. A major campaign of public

information is needed as soon as possible to raise awareness of the content guidance and offer reassurance to audiences. The BBC should also work to ensure that the next generation of Freeview and FreeSat PVRs have PIN protection functionality.

8. **More regular audience research**
In-depth audience research, along the lines of the findings in this paper, should be conducted more often to ensure that the BBC maintains a full and detailed understanding of audience attitudes to taste and standards. To keep up with changes in audience taste, research should be commissioned every two to three years. Careful attention should be given to key tracking questions that will enable the BBC to identify changes in audience and societal attitudes.

9. **Revision of Editorial Guidelines and Guidance**
The BBC's Editorial Policy department should use the research, general principles and recommendations in this report to inform the current general revision of the BBC's Editorial Guidelines and, in particular, to clarify audience expectations of tone and context. In addition, new Guidance will be required to keep programme and content makers up-to-date with audience expectations of BBC content.

10. **Increased commitment to training**
The research findings offer new opportunities to illuminate the understanding of taste and standards for programme makers across the BBC. The findings should be briefed to leadership groups in all content divisions by the Director and Chief Adviser, Editorial Policy. The Colleges of Production and Journalism should develop new training material that explores audience attitudes specific to each of the key genres, which will be rolled out to programme makers both in-house and independent. The audience research and the conclusions of this report should also be made available through normal Editorial Policy channels to all programme makers. The findings of this study and the materials used in it should inform online courses, which will be used to maintain editorial policy standards.

Background

This report aims to inform BBC editorial decision-making and training, and contribute to BBC's guidance for its editorial staff. It considers a number of key areas concerning taste and standards in broadcasting, as they affect the BBC's role within a fast-moving and increasingly diverse media landscape. The report and accompanying research are intended to contribute to the debate on society's attitudes to these questions and how those perspectives should be reflected in BBC content.

It has been produced under the supervision of a pan-BBC steering group [Appendix A] convened by the BBC Executive in November 2008, in the aftermath of the public debate that followed the 'Ross/Brand' incident on BBC Radio 2. The sponsors of the project are David Jordan, Director of Editorial Policy, and Jana Bennett, Director of Vision. The group has been led by Alan Yentob, Creative Director, and Roly Keating, Director of Archive Content.

The Terms of Reference are attached [Appendix B]. It was agreed to focus on four key areas:

- Strong language - questions of appropriateness and acceptability;
- Sexual content - including language, imagery and tone;
- Generational questions and expectations;
- How expectations are conditioned by platform, genre, channel, station and slot.

The subject of violence was excluded from the remit of the report as this will be subject to a separate research project later this year.

It was decided that original, in-depth and extensive audience research should be at the heart of the report. This involved the BBC commissioning some of the most significant pieces of work to have ever been undertaken in this area in the UK:

- Sonia Livingstone, Professor of Social Psychology at the London School of Economics, was commissioned to conduct a review of existing literature. Her report identified gaps in current research and understanding, including the impact of new media formats such as reality TV and online content, and the attitudes of young people to these issues.

- Original audience research was then commissioned from Ipsos MORI (quantitative) and the Blinc Partnership (qualitative): full details of scope and methodology are outlined in Taste, Standards and the BBC - Key Findings from Audience Research June 2009.

It was identified early on in the research programme that the term 'taste and standards' was ambiguous for many respondents. After discussion, it was decided to use the phrase 'morality, values and standards of behaviour' in the media, as this came closest to the area we were interested in exploring.

The report that follows is structured around the four key subject areas identified in the original Terms of Reference, with the addition of a separate section on the attitudes of Young People (11-15 year-olds). Analysis of 'generational questions' appears in the first section, framed as part of an exploration of audiences' views of the broader media and broadcasting landscape. The concluding section on 'expectations' is specifically focussed on audiences' attitudes to and expectations of the BBC itself.

Each section ends with a set of summary conclusions. The report presents a set of Recommendations to inform the BBC's programme making discussions and training. Audience research findings are published separately.

Section 1. The broader media landscape

1.1. Wider social concerns

The overwhelming concern of the public interviewed for this report was the issue of falling standards of behaviour in society generally.

Half of those people we spoke to felt concerned about morality, values and standards of behaviour in society as a whole; the second most pressing issue for them lay in the area of crime, law and order (38%). The question of education, schools and children (23%) and that of race relations and immigration (17%) followed in degrees of concern. The morality, values and standards of behaviour in the broadcast media was not at the top of the public agenda - only 14% expressed worry over standards in television programmes; whilst concerns about radio registered a mere 2% of those polled.[1]

Behind the statistics it was clear that there was a prevailing sense of living in more dangerous times than hitherto. Violence was a dominant theme, along with crime, terrorism, bullying and selfish behaviour such as greed, self-promotion and materialism. Some people felt the pre-eminent social sensibility was amoral and "tabloid".

In-depth conversations with the public revealed an uneasiness about the lack of a strong "value system" in society as a whole but also on a personal level; and in relaying their responses to questions and clips some respondents were uneasy to find their own values were relative rather than absolute.

Few of those interviewed immediately grasped the concept of "generally accepted standards", as cited by the Communications Act 2003 and the Ofcom Code, and most were unable to voice, un-prompted, what those standards represented to themselves as individuals. Therefore, the BBC in conjunction with Ipsos MORI expanded the question on generally accepted taste and standards to help respondents understand what was meant by the phrase. The questionnaire defined standards as "morality, values and standards of behaviour" in all the relevant sections; this enabled our audiences to identify their concerns more clearly.

1.2. Concerns about the media in general

Setting aside general social issues such as crime, law and order or education, children and schools etc, our investigation asked specific questions relating to causes for concern in the media. By this we meant newspapers, magazines,

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[1] Taste, Standards and the BBC - Key Findings from the Audience Research. *Figure 1: Concerns about morality, values and standards of behaviour.*

television and radio, internet, computer and video games – all those aspects of the media easily available to the public.

We found that adults we spoke to were most concerned about violence in video and computer games, and sexual content on the internet.

Then followed newspaper intrusion into private lives; bullying behaviour on TV and radio; violence on TV; intrusion into private lives on TV and radio closely followed by swearing or strong language on TV and also sexual content in teen magazines. Material offensive to minority groups and sexual content on TV were of some concern too.[2]

This report will explore the major causes for concern on television, radio and online outlined above. The issue of violence on television will be investigated in a separate piece of work later this year.

1.3. <u>Levels of concern about broadcast media</u>

The concerns expressed by the public are mainly focused on television rather than radio. 40% of those we spoke to said they had seen something on television (all channels) during the past 12 months which they felt should not have been broadcast. When we looked at this figure in more detail, it emerged that 5% of the public feel they "regularly" see things on television they felt shouldn't have been broadcast and 10% that they "often" do so; a further 16% said they had "sometimes" seen something they felt shouldn't have been broadcast.[3]

The 15% who said they regularly or often saw something which they felt should not have been broadcast emerged as a regular minority percentage throughout the survey. At other points in the survey, an almost identical number (16%) said they were dissatisfied with the standards of content in television programmes generally; 14% said they were concerned about programmes on television and 11% said they did not agree that some people were too easily offended by what some people say.

Overall levels of satisfaction with the BBC were high. 74% were satisfied with the performance of the BBC's television channels in this area, compared to 68% who were satisfied with standards on television in general.[4]

Of the 60% who had seen nothing to offend them over the last 12 months, an overwhelming majority were satisfied with the standards of television in general.

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[2] Key Findings from the Audience Research. *Figure 7: Issues of concern in the media relating to morality, values and standards of behaviour.*

[3] *Figure 8: Frequency of content that audiences object to being broadcast.*

[4] *Figure 2: Satisfaction with broadcast media and the BBC.*

And even the 16% of the public who said they "sometimes" saw items which they felt should not have been broadcast tended to be much more satisfied than dissatisfied with the general level of television content.

More than two in five people (41%) said they had heard or read about broadcast content (television and radio) which gave them cause for concern, although they had not actually seen or heard the item in question themselves. Increasingly, television content (more so than radio) is headline news for newspapers, with programmes and personalities filling the front pages in a way that would have been much less common fifteen or twenty years ago. This is also true of rolling 24 hour news, which regularly features stories about television to fill the non-stop schedules; it is perhaps not surprising that a significant proportion of the public object to material they have neither watched nor listened to themselves.

1.4. The definition of "offence"

Early workshops for the research project showed that respondents interpreted the concept of offence in very different ways. This is a vital issue, and not simply a question of semantics: "offence" is a key term of measurement in the broadcast industry, but the term is subjective, and means different things to different people.

The BBC's Editorial Guidelines previously referred to "taste and decency" as the standards by which content should be judged. With the advent of the broadcast industry regulator Ofcom and the publication of its Code of Standards in 2005, broadcast content must now be shown to be either "harmful" or "offensive" before it is considered to be unsuitable for broadcast - a higher test than merely being tasteless or lacking in decency.

As background for this report, additional research was conducted via the BBC's weekly "Pulse Panel". Audiences were asked the same question about every television or radio programme they had watched or listened to [in the preceding week]: "was there anything in the programme that you personally found offensive?"

Where the answer was yes, people were asked to describe what it was they found offensive in a particular programme. This Pulse survey demonstrated that "offensive" is a word with a wide variety of interpretations and applications. Many people applied it to the use of excessive offensive language or derogatory remarks about minority groups; others used it to describe irritation or dislike (especially concerning presenters); some used it to express disquiet at contemporary issues in pre-watershed content (eg. domestic abuse); it was also used to express political views or applied to people or content that was considered vulgar, such as burping or farting or the behaviour of an "uncouth" family in ITV1's *Coronation Street*. Others described items featured in the news as offensive – bankers or financiers, in particular were deemed to be offensive to

a number of respondents. Sexual references and, above all, depictions of same sex relationships were described as offensive by some.

We have to conclude there is little certainty or consensus about the meaning of offence. It can range from the perceived breach of deeply-held beliefs or values, to a considered response to a particular piece of content, to a "catch-all" expression of dislike, disagreement or disappointment – examples of content cited as offensive by Pulse panel members included "putting a modern extension with a glass front onto such a lovely building" or "the use of tomato ketchup in one of the dishes: tomato ketchup is only sugar and red dye." This was in stark comparison to those who found themselves "offended" by news items, where a term such as "disturbed" or "affected" might have also been used to describe their reactions to some content.

1.5. "A cacophony of noise"

Our inquiry revealed a real sense that many of the public, even the most media literate amongst them, have not yet quite got to grips with the flood of channels and content pouring into their homes. This was partly to do with sheer volume but also partly down to the feeling that broadcasters were seen to be less distinctive, less authoritative and, generally, used more licence in a multi-channel world.

The media world, and the broadcast media in particular, are becoming ever busier with seemingly limitless choice for the consumer. New digital channels broadcasting 24 hours of television, non-stop news and opinions, podcasts, blogs, downloads from around the globe plus an internet where information, adverts and entreaties bombard the public daily. As one of our interviewees put it, there is a "cacophony" of noise emanating from the television set nowadays, and there is a suspicion that broadcasters feel themselves obliged to shout louder and be more extreme in order to make themselves seen and heard over their competitors.

This feeling is accompanied by a perception that the overall quality of programming has declined. In the area of morality, values and standards of behaviour people told us that television programmes have got worse rather than better in recent years – 46% felt standards had fallen, compared with only 11% feeling that standards had improved.[5]

Previous research has shown that many people link the drop in general quality with the increase in multichannel television; they feel this invariably leads to too many repeats, more low-budget programming, too many makeover shows and reality shows (also seen as "cheap" programming) and a fall in taste and

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[5] Key Findings from the Audience Research. *Figure 3: Areas where standards are felt to be getting better/getting worse.*

standards, ie. more offensive language, sexual imagery and violence available at all hours.

Our respondents attributed this to competition; the public perception we encountered was that broadcasters were deliberately upping the ante, "turning up the volume" or deliberately pushing boundaries in an effort to stand out in an increasingly competitive market.

It should be noted that this concern over falling standards of quality is not new. Previous Ofcom and broadcast research tells us that the public are more likely to believe that standards on television have been getting worse rather than better over the past forty years.

Ever since the 1970s, the public have recorded their belief that standards on television have either fallen or largely stayed the same; there has never been a significant percentage declaring that television has improved. This is reflected in other research and in findings across many years of tracking surveys, which consistently show that around 40% each year feel programmes have `got worse'.[6]

1.6. Reality TV

Time and again the issue of reality television cropped up spontaneously in our research, and provoked strong views. The genre attracts significant audiences and covers a very wide range of programmes; our research found that viewers had distinct likes and dislikes even within the genre.

"Entertainment" reality shows such as *Big Brother* or *I'm a Celebrity Get Me Out Of Here*, attracted the most negative responses. In spite of the popularity of these programmes in the ratings, only 14% of our respondents said they particularly liked to watch them - whereas 56% said they would prefer not to watch this type of show. The more aspirational formatted shows, exemplified by *The Apprentice* or *The Restaurant*, were particularly enjoyed by 24% of our viewers with 27% saying they prefer not to watch this sort of programme.

For many, reality TV as a genre seemed to sum up a number of aspects they did not like about British life. These programmes were seen, above all other genres of programming, as reflecting their main concerns with society in general: selfishness, strong language, a lack of respect, poor manners, greater competitiveness, self-promotion and greed. The entertainment reality shows in particular were thought to set a bad example. Our respondents did not like the idea that contestants could win by essentially doing nothing and there was a feeling that entertainment reality shows exemplified the obsession with pseudo-celebrity, creating "stars" out of the un-deserving.

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[6] Key Findings from the Audience Research. *Figure 4: OFCOM tracking on overall TV programme standards.*

There is clearly a generational divide between audiences when it comes to purely entertainment reality shows. Younger audiences have been brought up with formats such as *Big Brother* and these sorts of shows are very much part of their media landscape. A great part of their appeal may lie in the fact that they are one of the few areas of mainstream programming where young audiences can see people of their age group reflecting their own interests, experiences and concerns. Older audiences are more inclined to regard this type of content as "lazy programming" by broadcasters and cannot understand the appeal.

There was a more mixed response to shows such as *The Apprentice, The F Word* or *Ramsay's Kitchen Nightmares.* Our respondents felt these shows had a purpose and there was positive material in the formats. Viewers understood that *The Apprentice* sought to replicate, to some extent, the high-pressure, dog-eat-dog atmosphere of the modern boardroom. The humour and persona of Sir Alan Sugar was contrasted favourably with the competitive and sometimes cynical behaviour of the contestants.

Gordon Ramsay also had his admirers; some of our respondents mentioned his career as a successful chef who had made it to the top of a very tough business. However, others disliked what was described as the "Brand Ramsay", exploiting strong language and a deliberately confrontational manner to attract viewers.

1.7. <u>Generational differences</u>

This survey sought to explore what differences, if any, could be found in the various sections of society in their attitudes towards morality, behaviour and values in the broadcast media.

Our research confirmed previous findings that age is a key determining factor when it comes to concern expressed about television programmes amongst adult viewers. Only 7% of under 35 year olds had concerns about what they saw on television, compared to 22% of those aged 55-74. This is echoed by levels of offence; those seeing something they find offensive are much more likely to be older rather than younger (27% of 16-24 year olds, compared to 74% of those aged 75 and over). In all these cases, women are marginally more likely to feel concern or offence than men.

Within the older age group there were a number of people who felt strongly about issues such as offensive language and sexual content.

Many of these people were uncomfortable with the multi-channel environment and measured standards and values in society and broadcast content against the experiences of their youth. This group felt strongly that they wanted Britain to be the way it used to be – and that was true of their expectations of the media too.

The most vivid illustration of generational differences in recent times came in the aftermath of the Ross/Brand affair. An in-depth report and disciplinary action by the BBC, the BBC Trust and Ofcom has already addressed the issues and failures of this incident, and this report does not seek to re-examine the facts of the case.

What the Ross/Brand affair revealed was the polarised responses of our audiences. The BBC received an avalanche of complaints from the public (around 40,000), after the story was reported in the national press. Conversely, an equivalent number of people joined a social network group in support of the presenters, and over 7,000 contacted the BBC to express their disapproval of what they saw as draconian action against them on the part of the BBC.

Clearly, the support for Ross and Brand did not in any way mitigate the very real offence caused by their broadcast or by the BBC for the erroneous decision to broadcast; but it does show that there may well be markedly different ideas about behaviour and offence between generations.

1.8. Diverse opinions

This research project took great care to include those communities which are often under-represented or marginalised in the debates around values and standards. The picture we received was of a more nuanced demographic, where groups at very different life stages may share some of the same sensibilities.

This confirms that age is not always a guarantee of agreed attitudes, standards and values. Our research team spoke to a woman in her 70s who shared a fondness for *Friday Night with Jonathan Ross* with her 32 year-old hairdresser. They also shared a dislike of the excessive use of strong language. There were others in the same age range who enjoyed contemporary shows such as *Little Britain* and, most notably, a significant percentage who regularly watched "cutting-edge" talent:

"I say I mind swearing but I am not sure I do when you say those names....I love Paul Merton, I quite like Frankie Boyle – I like the show. Jonathan Ross is so fast, his wit – we SkyPlus him when we are away" (male, 75, South)

Diverse opinions exist within the same generation. Some of those in the 65-plus age range were enjoying life without the responsibility of a family, exploring new shows and talent, even acquainting themselves with new media. By contrast, others felt more vulnerable in a world which appeared to them to be increasingly harsh and crude and this group felt that television no longer provided a safe haven from the more unpleasant aspects of contemporary life.

BBC has always been a leader, but now the wrong way. We turn off if we hear swearing. (female, 70s, South)

For those members of the audience who felt a greater apprehension about the world at large, there was a perception that television (rather than radio) reflects modern life in much of its programming. Some thought that programmes (even pre-watershed) now draw on the trials and tribulations of the modern family – marriage breakdown, sexual experiences etc. This expresses a very different sensibility than the pre-watershed content of the past which, for them, reflected a gentler, slightly idealised world.

This feeling of disquiet, which was most typical of older respondents, was also echoed by a few small sections in the groups identified by our research; in particular, by women from different age ranges who are more likely to have a faith. This was the group of people most concerned by occasions of violence and bullying on television and also by what they see as intrusion into the private lives of others.

Although this section of the audience has clear views about the portrayal of what they consider to be the more unpleasant aspects of society on television, they are correspondingly strongly supportive of creativity, even if it means some viewers may be offended. They are also very supportive of the BBC being able to show material which others might find offensive. These members of the audience encourage creativity and experimentation but also have strong expectations of broadcasters to work within clear guidelines and to maintain certain standards.

Our research also identified a small section of the broadcast audience who expressed "moderate concerns" about morality, values and standards of behaviour. Predominately female, married and likely to have some religious belief, these members of our audience are anxious about the license afforded to young people without the corresponding discipline. Many of this group had a particular dislike of excessive strong language and some objected to any inclusion of strong language in television programmes. They did not support creativity by broadcasters if originality also carried with it the potential for offence. Unusually amongst our audiences, this small section of society largely relied on the broadcaster to ensure viewers did not see unsuitable content rather than making their own decisions about content.

Religion or faith also emerged as a significant factor in determining attitudes towards taste and standards.

In a number of areas, those who said their faith was important to them differed substantially from the rest of the public in their levels of concern.

Of the 23% of respondents who are religious and say that religion is very important to them, 21% are concerned about programmes on television and radio in terms of standards of morality, values and behaviour, compared to 14% of the public overall.

This group were also more concerned than the average about strong language on television (30% were "extremely concerned" compared to 17% of the public) and on radio (19% compared to 10%) and about sexual content on television (25% compared to 12%).

Faith is a less important factor than age in determining offence and attitudes towards opinion-forming issues such as the broadcast of strong language but it does play a role. This was also reflected in attitudes towards offensive material and freedom of speech.

In our survey, Muslims, in particular, had more stringent views than the rest of the public over some key issues. More than a third of those Muslims we spoke to (35%) did not agree that freedom of speech was more important than the risk of causing offence. Likewise, nearly half of those Muslims questioned (48%) did not agree that "the BBC should not be afraid to show material that some people might find offensive". They are also much more likely than the rest of the public to cite strong language on television as an issue that concerns them and were also more likely than the majority of the public to agree that "programmes or performers that have or use excessive offensive language or sexual references show a lack of respect for the audience."

There were two groups who expressed very few concerns about broadcast content.

One of these was typically made up of younger men (16-34) who, on the whole, feel that strong language is acceptable for broadcast as it reflects the real world; that people are too easily offended and they value freedom of speech over and above the concern of causing offence.

The second group were adults with more liberal attitudes; they also felt that strong language and sexual content is acceptable for broadcast as it reflects real life. They were comfortable explaining more adult themes and content to their children and are supportive of same sex relationships. They are also the group who most enjoy comedy series, quiz shows and panel games and they are at ease with new technology, including downloading content.

Both these groups feel in control of their own content choices and see it as their own responsibility to decide on what is appropriate for themselves and their children.

1.9. The broader media landscape: conclusions

Our research confirms that there is still, in broad terms, a generational divide on issues of morality, values and behaviour in broadcasting. There is clearly a feeling amongst some older audiences that television in particular does not always provide the generally comfortable viewing experience of the solely terrestrial era.

Concerns over standards in broadcasting are not a pressing issue for most audiences, but there is a view that the 'cacophony' of multi-channel television and reality formats has had a detrimental effect on overall standards amongst all broadcasters.

Comedy, for instance, is seen as "edgier" than previously; the lifestyle of the young family, a frequent subject for pre-watershed comedy, does not necessarily reflect the experience of the older viewer. Likewise, soap operas increasingly deal with those issues that were not explored in the past and which make for slightly uncomfortable viewing for some older audiences. But there is also a feeling that many lifestyle programmes and a wide number of dramas appeal to an older generation.

Younger adult audiences are generally far less offended than the generations above them. They are also much more likely to feel at home in a multi-channel world and more ready to use new media in all its forms which gives them a sense of confidence and self-determination when dealing with broadcast content; This sense of confidence and control is lacking in certain sections of the older generation, who can feel overwhelmed rather than in charge of their viewing choices.

As ever, there are some linkages between the various generations and the various demographic groups. The young parents are likely to be more concerned about media content than at any other point in their lives; they are seeking absolute certainty and security about life in general and the media is part of that desire.

In this, they share some concerns with the older generations. By contrast, the older parents have learned to negotiate the vagaries of life and this is reflected in more specific and less general concerns:

"Change happens..you can't stop it..I would be more concerned if I had younger kids but now I have to fall back on trust. My one big issue though is that all the stuff on the internet and in games is desensitizing kids to violence"
(father of teens, Hastings)

Programme makers are faced with the challenge of appealing to increasingly diverse audiences with correspondingly diverse tastes. Producer John Lloyd,

whose credits include *Blackadder, Quote… Unquote, The News Quiz, Not the Nine O'Clock News, Spitting Image* and *QI*, says it is essential that programme makers do not lose sight of their audiences:

"I feel I am the audience and I don't feel the audience is different to me. My decisions about the tone of a programme and all those accompanying issues are always guided by this idea."

Section 2. Young people: 11-15 year-olds

2.1. <u>Young people's consumption of media</u>

As highlighted by Professor Sonia Livingstone's Literature Review for this report, very little previous work has explored the attitudes of young people to issues of morality, values and behaviour in broadcast content. We were therefore keen to supplement our main research project with a specific focus on 11-15 year-olds.

Our research was not as in-depth as the corresponding adult project – we did not, for example, show young people clips of strong material – but it has provided us with a fascinating snapshot of some of the concerns of the young and revealed what they think about their place in the media landscape.

Television is still the most popular medium for young people with 62% of 11-15 year olds most frequently watching television; but using the internet was not far behind in popularity, with 57% saying it was the media activity they favoured most. Both playing computer games (32%) and watching DVDs (26%) also rated fairly highly. By contrast, only around 13% spent most of their time listening to the radio.

The boundaries of their television viewing bore little relation to the well-understood demarcation line of the 9pm watershed. Over half of all those we spoke to said they were allowed to watch TV until 10pm or beyond on a weekday; 16% of whom said they could watch TV at any time they wanted.

At weekends, more young people were allowed to view even later in the evening; more than half of the young people we spoke to were able to watch programmes after 10.30pm. As 71% of those we spoke to had a television set in their bedroom, it is likely that most of this late night viewing is done alone, without adults present.

"Children should go to bed and let adults watch what they want" (year 6 pupil London)

There were fewer concerns with radio, with a majority of young people either having no restrictions on their listening hours or not being aware of any parental rules regarding time restraints or curfews.

Our young respondents gave us an interesting picture of their own media consumption. Our face-to-face, qualitative research found that young people were confident users of new media and decisive in their selection of content from all sources. They viewed, listened and communicated within their own, self-created media bubbles. The self-created world was quite narrow and revolved around regularly visited social network sites - 90% of girls and 69% of boys with

internet access at home used these sites, such as MySpace, Facebook, MSN, Bebo and others. Texting and Bluetooth also played a large part in this communication, viewing and sharing environment.

There are clearly attempts to regulate internet usage by parents. 66% of all those we spoke to said there were rules in their house over internet usage, both the types of sites visited and the number of hours of access permitted - although a third, 33%, said there were no rules.

Only a few broadcast programmes really penetrated the young person's world and achieved any significance within it. The E4 series *Skins* was most frequently mentioned as both an edgy show with some worrying themes and also an aspirational show, which a fair number of young people admitted to watching simply to keep up with their friends:

"I think shows like Skins kind of raise the stakes for planning your social life, people think parties are going to be like that, they think they should behave like that." (Female, 6th Form, Manchester)

The media world of the teenager/young person is very much an extension of the playground with shared jokes, likes and dislikes, gangs and groups, cruelty and humour. Outside of school hours, this tight-knit society picks up momentum as it continues to talk and squabble via sites such as FaceBook or the use of MSN. Young people were aware of the incendiary nature of this fast-moving world in which quarrels could flare up at a moment's notice and where there was a real danger of playground mockery becoming more sinister and turning into bullying. Gossip, boasting and taunts are posted and scrutinised and generate, in turn, more chat and comment.

Most of the young people we spoke to were conscious that this world was un-regulated; there was little or no sense of adult involvement or external authority being brought to bear on it. This was liberating and exciting but also carried with it a perceived menace.

Like their adult counterparts, young people were more concerned with elements in society generally; the media was of little concern. Their main worries were the threat of violence, especially street violence, gangs and the danger of bullying intruding into their lives. There was also a sense that both drugs and weapons were readily available on the fringes of their world.

2.2. Swearing

We talked specifically to young people about strong language – the term "swearing" was used as our respondents were not sure what was meant by strong or offensive language.

About half of all those young people we spoke to said they use swear words at least every week. Many young people first heard those swear words which they themselves now use at school (46%), via friends (21%) or at home (19%). Only 13% said they had first heard the swear words they now use on the television – and only 1% on radio.

We also asked our respondents where they felt they were most likely to hear swear words, 78% said school was the most likely place to hear strong language; amongst their friends (46%) and when generally out and about (40%) and then on TV (35%), DVDs or films (34%) or radio (3%)

Young people, like adults, felt that the acceptability of swearing was largely determined by the tone and the intent. They differentiated between swearing "in a funny way" and swearing that was "nasty" in tone. Nasty or foul language was associated with bullying and violence – two of the main threats in their own lives.

The view from our adult research that standards of behaviour in society in general are in decline was echoed by our younger respondents. They too felt that the generation immediately below their own was less well-behaved, more foul-mouthed and less disciplined than they were themselves.

"Down in the lower years they seem to be a lot more aggressive and a lot less respectful. They don't give you any respect at all, they just challenge the stuff."
(male, 6th form, Manchester)

Writers and performers are conscious of the need for extreme caution over the use of even mildly offensive words in content which attracts a younger audience. Russell T Davies, whose credits range from the controversial drama *Queer as Folk*, the adult comedy *Cold Feet* and who revived *Dr Who* for the BBC is aware that the acceptability of language changes with each generation:

"As a writer you need to ask yourself how much language reflects society. You must make careful decisions about the language you use. I included a `bloody' in Dr Who, which I did after watching a Harry Potter film with a child and seeing them laugh. What that told me was that language had moved on; there are key moments when things become acceptable for different people and especially for different age ranges. We can't hang on to the way language was; as writers, we need to reflect the way we live now."

2.3. Sexual content and parental disapproval

About a third of young people said there were television programmes that they would feel embarrassed to watch with their parents. Not surprisingly, the top of mind issue for this small group was sexual content, described by them as anything involving "sex, kissing, naked, naughty, love scenes".

This was further echoed when asked what programmes they had watched which their parents might not have wanted them to watch. Top of the list were films – in their words, ones that were "horror/scary, dirty or violent". Then came *Skins, Shameless, Family Guy*, the US film comedy *American Pie, Little Britain, Two Pints of Lager, South Park, Hannah Montana, Waterloo Road* and Gordon Ramsay's *The F Word*.

The in-depth interviews did bring forth a great deal of unease about the sexual nature of the world in which they lived – magazines, music and music videos, fashion, peer-group pressure – and an awareness for some that even pre-watershed television content was also increasingly sexualised.

It was important to both teenagers and their teachers that pre-watershed shows made clear the consequences of on-screen behaviour such as bullying, aggression, relationships and generally bad behaviour. However, more in-depth research has shown that young people also criticise pre-watershed television content - soap operas, in particular - for being too moralistic when depicting sexual relationships or aggressive behaviour. Young people were very aware that such issues did not always resolve themselves in a fair and moral way in real life.

The real concern about sexual content lay not with television or radio but with the material available online and the vulnerability of young people when online themselves. Although most young people in our survey said they were aware of the need for responsible online behaviour and were aware of the dangers of revealing too much personal information, face-to-face interviews revealed a less reassuring picture.

A number of children – and their teachers – mentioned occasions where young girls had posted revealing photos of themselves online and had lied about their age to web "friends" in an attempt to gain attention and popularity.

The viewing and communication of pornography was seen as a significant issue for young boys. Although male pupils were reluctant to talk openly about their use of online pornography, the teachers we spoke to suggested that about half of the boys they taught viewed porn online at home, after school hours. It was increasingly common for boys to download images to their mobile phones and swap material with friends. The content is a far cry from the Playboy-type magazines of old; teachers expressed real concern that that the material currently being accessed was different in both scale and kind than that available to previous generations.

2.4. Young people: conclusions

Many of the young people we spoke to had created a media environment for themselves in which television played a small but significant part. There are

some parental attempts at regulation; broadly speaking, children from more affluent homes were more likely to be subject to PIN protection on web sites, as required by their parents. As a consequence, these children were more observant of controls and were themselves more selective in the type of content they watched or accessed. They developed a more responsible attitude towards self-censorship and were very aware of what was unsuitable for them and their peers.

But children from more disadvantaged backgrounds were far less likely to have any restrictions applied to their television viewing and their internet usage; they were also more likely to break whatever rules where laid down. Consequently, they did not develop the same sense of restraint towards their own use of content shown by their more closely-supervised contemporaries.

The predominance of television in bedrooms and the easy access to clips and programmes via internet sites such as YouTube make it easy for children to consume stronger adult material and more difficult for parents to monitor their children's viewing choices. Content and catch-phrases from post watershed comedies such as *The Catherine Tate Show* and *Little Britain* are the stuff of every school playground, despite the fact that they are not aimed at or scheduled for younger viewers. And strong dramas such as *Skins* and *Shameless* which show contemporary life in all its aspects are some of the few programmes that are actively sought out by young people.

Pre-watershed content such as *EastEnders*, *Hollyoaks* and *Waterloo Road* still attracts an audience – young people want to watch storylines about people of their own age and all three dramas contain a lot of teenage storylines – but it is worth noting that there is some unease about strong material, especially in *EastEnders*.

Along with the perceived threat of violence, the greatest concern was the pressure of sexualisation, which was expressed by a number of the young people we spoke to. Sex and sexual content was all around them and there was a sense of young people wanting to escape from this at times, although the programmes they invariably sought out tended to be more adult, "knowing" and sexually explicit.

Likewise, young people, especially boys, readily accessed more extreme online sexual content, often viewing it together and sending it to others. Girls are under increasing pressure to be part of this world and "sexy" photos of themselves posted online are considered a normal part of most teenage websites.

Section 3. Strong language

"Offensive Language is one of the most frequent causes of complaint. Judgements about its use are difficult because they depend on tone and context. There is no consensus about words that are acceptable, when, and by whom. Different words cause different degrees of offence in different parts of the world. So a person's age, sex, education, employment, belief, nationality, and where they live, all impact on whether or not they might be offended."
(BBC Editorial Guidelines: Appendix C)

3.1. A source of constant complaint

Language which offends has always been one of the main causes of complaint from audiences to the BBC. As early as 1923, the board of the BBC (then the British Broadcasting Committee) considered a complaint about "certain vulgarity by a humorist" (January 4th, 1923); a reprimand was duly issued to the offending humorist, and this was simply the first in a continuous stream of objections from members of the public about language on the BBC.

A 1971 report on Language and Programmes by Colin Shaw, then Secretary of the BBC, analysed audience reaction to strong language:

"There is no doubt that many of those who complain about bad language look back to some golden age, forgetting that there was never a time which was not condemned as hopelessly degenerate by an earlier generation. Further, there may well be a tendency to condemn changes in the use of words less for the changes themselves than for the changes in society which they reflect."
(September 15th, 1971).

Colin Shaw's summary finds echoes in the 2005 Ofcom Report into Offensive Language and Sexual Imagery in Broadcasting. The Executive Summary to the report begins:

"Participants in the research felt that swearing and offensive language has increased and become more widespread over time. It is seen as a symbol of a decline in public standards, for which few participants could determine the cause, although some felt that the media played a part." (September 2005)

3.2. The public and offensive language

Strong language was a pressing concern for some audiences and by far the most polarising issue for respondents. A "generally accepted standard" did not emerge from our research – and this was reflected in the audience response to programmes.

More than half of those who liked dramas such as *Skins* or *Shameless*, or who watched panel shows such as *Never Mind the Buzzcocks* or *Mock the Week*, or who enjoyed comedies such as *The Thick of It* or *The League of Gentlemen*, said they were not very concerned or not concerned at all about strong language on television. Whilst only 21% of those people who enjoyed period dramas such as *Cranford* or *Lark Rise to Candleford* said they were not very or not at all offended by strong language.

Our survey found overwhelming agreement that strong language is far more prevalent in modern society than previously. The vast majority, 87%, of those questioned agreed with the statement "nowadays you seem to hear a lot more strong language in public than you used to." And 63% confirmed that they themselves used strong language such as the "f-word" at least "sometimes" in public or at home.

Where there was concern about strong language in society it also extended to television as a whole. Although concern about standards on television in general is low (14%) compared to other issues in society; when asked to name those elements which gave cause for concern on television, strong language or swearing was top of the agenda for 33%, followed by violence (23%) and sexual content (21%).[7] Radio did not reflect a similar degree of concern. In general terms, people felt that radio scheduled appropriately with little opportunity for children to hear strong language.

Strong language on television is a concern for many, even though an individual may themselves use strong language at times. However, a majority of our audiences (62%) also told us that "it is acceptable for television to show some programmes with strong language because it can reflect how some people speak nowadays."

But almost exactly the same number of people (59%) agreed with the statement that "programmes or performers that have or use excessive offensive language or sexual references show a lack of respect for the audience."

At first glance these statements appear to be contradictory. However, the link between these two lines of thought is the word 'excessive'. Terms such as 'excessive', 'gratuitous', 'repetitious' and 'unnecessary' are vital to the broadcaster's understanding of why strong language has the dual power to become acceptable or unacceptable and it is important to explore this in more depth.

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[7] Key Findings from the Audience Research. *Figure 6: Issues of concern in the media relating to morality, values and standards of behaviour.*

3.3. <u>'Is it Necessary?'</u>

"When it comes to strong language or material, writers and performers must always ask themselves, is it justified? Is it necessary? Is it funny?"
(Armando Iannucci, writer, producer, performer)

The basic premise of "is it necessary?" was one of the first criteria for the public when they came to assess a number of clips which contained the use of strong language. It is also one of the most useful tools for programme makers when it comes to decisions about language.

Our research team showed a number of clips, mainly from the BBC but some chosen from other mainstream broadcasters, to our groups and asked their opinion on the acceptability of the strong language within the context of the programme, slot, broadcaster etc.

Throughout the research process, the clips used were chosen as they all raised different points of editorial judgment for the programme makers. The intention of the research was to use the clips as stimuli for a discussion of each area we wished to explore; strong language, sexual content, aggressive behaviour etc. The programmes from which the clips were taken were not "under investigation"; rather they were a means to an end, an introduction to each subject and a prompt to our respondents.

Very few people objected to the use of strong language in principle and there were no calls to ban strong words or terms on any channel or radio station. Instead people automatically assessed the context of the broadcast in making a decision about the acceptability of the terms used.

A case in point was a clip from the BBC One panel show *Would I Lie To You?* One of the panellists uses the term "fucking" as part of a joke; this was then echoed in comments by the show's presenter.

Our audiences were fairly unconcerned about the use of the term itself, feeling it was just the sort of language one would expect to hear nowadays and it was used for comic effect, not in an aggressive or bullying manner. However, their key concern was the feeling that it had not been necessary to use the term to get a laugh. The strong language added something to the joke but not enough to warrant its usage.

The series, which was a new one, was also felt not yet to "have earned the right" to use strong language in what some saw as a careless manner. They felt a well-established series such as BBC Two's *Mock the Week*, known to have a strong satirical edge, had the right sort of "heritage" to use this kind of language. But a relative newcomer, with little or no audience expectations and a less

sophisticated tone, should be more careful in its use of potentially offensive words.

3.4. Repetition

Repeated use of strong language was also seen as a key part of the "is it necessary?" test. Our respondents were quick to differentiate between the acceptable frequency of strong language and repetition which had no purpose or whose purpose was clearly to shock.

Repetition of offensive words can be used skilfully and to great effect. People we showed it to had few issues with the BBC Four comedy *The Thick of It*. The constant bad language of a leading character was understood as a comedy device, crucial to his role as a bullying, manipulative bad guy. Although this series was not to everyone's taste, there were no objections to it being broadcast, despite the very high levels of strong language.

By contrast, the frequency of strong language in a clip from Gordon Ramsay's popular *Kitchen Nightmares* series (Channel 4) was described by some respondents as gratuitous. They felt scenarios were deliberately contrived to allow Gordon Ramsay to display his "trademark" bad language and the sheer volume of language was deemed by some to be unacceptable.

3.5. Language and intent – a question of tone

Offensive language is easily recognised by our audiences, even if degrees of concern and offence differ widely. Aggressive and domineering behaviour were seen as significant factors by those analysing the use of strong language in programme clips presented to them. Words or phrases alone did not necessarily render content offensive – for example, many people thought the word "fuck" itself (a mandatory referral to the relevant output controller at the BBC[8]) was "strong but not offensive" – but intent, tone and personality all combined to make a word or term more or less offensive.

Our research found that bullying was not spontaneously mentioned by those taking part in the workshops. However, people were quick to comment when the subject was introduced in these sessions, reflecting the concern expressed in our survey about bullying in society in general. There was a particular concern expressed by some that aggressive behaviour on the part of media personalities could lead to the "normalisation" of this kind of behaviour in wider society.

However, a warning note was sounded by writer Russell T Davies:

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[8] See Harm & Offence chapter, BBC Editorial Guidelines.

"I think we have to be cautious about the term `bullying'; it has become something of a catch-phrase and, on television, is often little to do with real bullying which can be genuinely nasty.  There is now a tendency to label any strong discussion or interview as `bullying'; as if the person who came off less well in the exchange is a helpless victim who cannot defend themselves. That's very rarely the case."

A clip featuring chef Gordon Ramsay was used to introduce our groups to the subject of strong language and correspondingly strong behaviour. Both are characteristics of Gordon Ramsay's television persona; his abrasive on-screen performances attract up to five million viewers for his C4 shows.

The clip featuring Gordon Ramsay saw him confronting a restaurateur. People felt the clip was characteristic of the chef's powerful persona. The strong language was clearly an important factor for our research groups, but just as important was the apparently hostile manner of the exchange. For those who did not like Gordon Ramsay's style, the aggressive manner of his delivery exacerbated the impact of the language used.

Those who did appreciate this type of programme felt that the well-established nature of a personality such as Gordon Ramsay was a mitigating factor – there was an understanding that people knew what they were getting by opting in to this sort of show, which reflected, to some extent, the cut-throat world of top restaurants:

"With Gordon Ramsay, in the context of what he is, that's what he does. You wouldn't watch him if you were offended by him." (Female, 40s, Leicester)

3.6.   Talent – tone and delivery

"The personality and delivery of a performer is important. A performer who has charm is much more acceptable to an audience; strong material needs to have been thought through – and the audience can sense this when they watch or listen to it."   (Armando Iannucci)

Tone and intent can also be used to make strong language acceptable; again, the delivery and the personality of the speaker are of paramount importance in the reception of potentially offensive terms and content. One of our respondents stressed the importance of "a twinkle in the eye" of the performer or presenter. Aggression or mean-spirited delivery of strong language was unacceptable whereas similar material could be transformed, and much of the potential for offence removed, by skilful or light-hearted delivery.

Some research groups looked at a clip from *HIGNFY* and singled out Paul Merton as a performer who used originality and timing to elicit a laugh rather than relying on offensive language. Our viewers watched a scene where panellist Toby Young made a potentially offensive remark about Barack Obama which

was passed over to another guest, black comedian Reginald D. Hunter. Both Reggie Hunter and Paul Merton effectively turned the tables on Toby Young, ensuring the remark was not seen as either racist or offensive. Our viewers felt the deft and humorous handling of the remark upheld the show's reputation for quality, and typified why the public also allow the show licence to occasionally push the parameters of taste.

The criteria of earned reputation and established expectation were also factors in the acceptability of material. Some of our viewers watched a joke made by veteran American comedienne, Joan Rivers, which mocked Heather Mills and referred to her disability. The overwhelming response was that the story was absolutely typical of Joan Rivers' material and did not exceed the audience's expectations of her. Many viewers pointed out that as Joan Rivers was unfailingly harsh and humorous about herself and her own family and this also entitled her to be outspoken about others.

Comedy elicited a wide range of responses from our research. It was unique as a genre as it was felt to be almost entirely a matter of personal rather than general taste. Whereas drama might attract a wide range of viewers, audiences were far more specific about the type of comedy they enjoyed and they showed tolerance for material, even when it was not to their individual taste.

Strong material from Frankie Boyle on *Mock the Week* was largely a matter of taste. A joke about the Queen was criticised by a few, more for lacking in respect for older women, than for any perceived attack on royalty. It was considered largely acceptable by most people in our research groups, but for some older respondents, his humour was in poor taste.

Others spoke affectionately about the heritage of the joke itself and compared it to material in the classic comedy *Are You Being Served?* His fans described his material as `sharp' and some of those who did not like this style of comedy, acknowledged that the material was clever rather than cheap.

Ben Miller, of the comedy duo, Armstrong and Miller, is a passionate advocate of the necessity for comedy *"to live on the boundary of good and bad taste."* Speaking about comedy in general, he told us:

"For centuries, comedy has been the lord of misrule and it needs to maintain that role of up-ending the status quo, challenging authority and refusing to automatically conform. It's the role of comedy to do this."

The broadcast industry thrives on strong personalities who attract large followings – in part, because of their rebellious nature. Such characters also divide the public in their responses. Our research showed polarised views about well-known broadcast talent, and the effect that perceptions of a personality have on the assessment of the suitability of content.

Our research groups were played an excerpt from the Chris Moyles Radio1 Breakfast Show in which he makes an extended joke about prostitution, associating it with Polish women. Although there was no strong language used in the broadcast, the majority of our groups felt the material was inappropriate, largely due to what they saw as a "graceless" tone of delivery by the DJ. Those who disliked the attitude and nature of the content also remarked that the friends or "posse" in the studio did not attempt to stop the presenter from developing the theme, when they should have done so.

For the 7.5 million listeners who regularly tune in to Chris Moyles on Radio 1 – who were not necessarily proportionately represented in the research groups – this sense of a DJ and his friends who are rebels rather than role models is an essential part of the appeal. Strong presenters like Chris Moyles are the "leaders of the pack" and especially attractive to younger audiences, whilst acting as a lightning rod of disapproval for parents and the older generation in general.

3.7. Context and quality

Very few of the people we spoke to held an absolutist view when it came to strong and offensive language. As far as most respondents were concerned, even the terms that they considered the strongest and most offensive language had a place in the broadcast world, but the threshold of acceptability was set very high.

The most striking example of this was a clip from the BBC One drama *Fiona's Story*. This was a drama about internet child pornography and the resulting breakdown of a "normal" family. Groups were shown a clip from the most climactic scene of the film, a confrontation between husband and wife in which the husband uses the word "cunt" twice.

In principle, the respondents were concerned about the use of such an offensive word, but on actually viewing the clip, their levels of concern were low. They felt the drama made for uncomfortable viewing because of the subject matter and the powerful portrayals but not because of the use of the "c-word". They cautioned against too frequent a use of the term in case the word became a normal part of post-watershed content, but this particular usage was felt to be acceptable and appropriate.

Our groups identified two main factors in reaching their conclusion about *Fiona's Story*. Firstly, the context of the clip – the drama met all the criteria for justified context in their eyes – and, just as importantly, the quality of the drama. Quality is a term that cropped up repeatedly throughout the research process. Audiences were extremely sensitive to the quality of content; in many cases it was the deciding factor for the acceptability or unacceptability of language. In Fiona's Story, our groups felt the quality of the writing and acting made the use of

the very strongest language acceptable and they understood why it had been used.

The BBC recognizes the "c-word" can cause particular offence to sections of the audience. Proposals for its use are therefore subject to mandatory referral to the relevant output controller; in Vision this is further reinforced through a formal system that requires sign-off at Director level.

"Strong language is not always essential in comedy but, used properly, it can be incredibly effective. Characters or performers have to earn the right to use strong language, it has to be justified. The character of Malcolm Tucker (The Thick of It) is seen to take a genuine delight in using graphic imagery and strong language. It isn't a casual thing, it's very deliberate and is essential to what he is." (Armando Iannucci)

The necessity for the audience to understand and approve the context of strong language was also demonstrated in the response to a section from *The Wenner Tapes*, a programme broadcast on Radio 4 at 9am. The programme featured an archive interview between the founding editor of Rolling Stone magazine and John Lennon. In it, the former Beatle speaks angrily and uses the term "fuck" - only one of several instances throughout the interview. R4 had scheduled it in a broadly-popular slot but had taken great care to alert listeners to the content, even including references to the offensive language in specially-commissioned trails.

Although some in our groups queried the chosen slot, no-one objected to the strong language. They felt the archive nature, and cultural interest of the interview gave the programme a context and a quality which afforded it some licence with the slot. Moreover, they recognised Lennon's anger as genuine – some compared it favourably to the "manufactured" anger exhibited in contemporary shows – and felt his tone and intent were properly expressed through the language.

3.8. Strong language: conclusions

"Strong language does have a place in comedy. In QI it is inevitable that sometimes a guest will use a strong word occasionally, it's the nature of performance. But we talk through how we handle this with the BBC; sometimes the language really adds to what has been said, sometimes it is better to edit it out or bleep it." (John Lloyd)

The public are very aware of an increased use of strong language in society generally, and this is reflected in their observations on television (less so on radio). Our groups felt there was little respite from strong language in a multi-media world with access to a huge range of television channels 24 hours of the day, seven days a week. Strong content could be accessed, or stumbled across,

at any time of the day or night and this added up to the sense of a barrage of noisy content, where it was increasingly difficult to find more relaxed viewing.

Audiences have a keen understanding of context which informs their decisions about the acceptability or unacceptability of language. Furthermore, they have highlighted the real importance of issues such as tone, frequency and, above all, the imperative for strong language to be "necessary" if it is to be included in a programme.

They made clear that when strong language is combined with domineering or aggressive behaviour, especially by a presenter or other successful role model, it can have the effect of making material potentially more offensive.

Our groups feared the casual use of strong language would result in it becoming "normalised" – sentiments which have also been recently expressed by performers and commentators. At a BBC debate on the use of strong language on television, comedian Frank Skinner described his own experience of a more judicious use of strong language in his act. He realised that too much strong language resulted in the language itself losing its impact: *"It became as irritating as someone incessantly saying 'you know' in every sentence".* But, used sparingly, and in front of the right audiences *"swearing can be a beautiful comedy tool."*

Likewise, the writer Tom Sutcliffe called for a more restrained use of strong language on television which would: "*give the meaning back to language."* Very few of our respondents wanted a ban on offensive language, but there was a clear message to programme makers that unnecessary strong language alienated some audiences and great care must be taken in the decision-making process when including the most offensive language.

The area which demands the most attention from programme makers is the use of scripted offensive language in entertainment shows (as opposed to scripted comedy series or sketch shows). Our audiences drew a clear distinction between the well-placed use of a strong term in improvisational comedy and the idiomatic use by a host or presenter – strong language was acceptable when used to add to the impact of a joke, story or statement; casual or lazy usage was rarely necessary.

A secondary factor was the necessity for both the show and the performer/entertainer in question to have "earned the right" to use strong language. It was not a given that offensive language could or should be used in every show; the style and the tone of the show and its contributors were a key factor in deciding whether or not offensive language was a necessary ingredient for each particular series.

Section 4. Sexual content

4.1. Sexual scenes

Although the issue of sexual content on television rated quite highly as a top line thought for 21% of our respondents,[9] the actual degree of concern was far less than the concern expressed about sexual content on the internet or in teen magazines. Sexual content on radio was of very little concern to our audiences.

There is little overt sexual content on mainstream pre-watershed television. Our research group were shown a clip of a scene from a relatively new BBC One series, *Holby Blue*, broadcast at 8pm. As with all content shown to the research groups, the clip chosen was to introduce a particular theme rather than to draw conclusions about the programme excerpt per se.

The clip, showing a policeman hurriedly making love to a girlfriend when he was supposed to be on duty, was felt to be too explicit for the slot. Interestingly, many respondents felt the sex was "aggressive" whereas the intention of the scene was essentially humorous; others felt it was inappropriate to show a police officer making love as the police should be portrayed as role models in a family show.

Overall, the respondents objected less to the scene itself than to what they perceived to be a lack of judgement and a failure of tone in the portrayal. Again, they asked the question "is it necessary?" and they felt it was not necessary to have gone quite so far in a pre-watershed drama.

In general terms, most people felt that nudity was not a concern and for those few who did not tolerate it, their attitude was one of embarrassment rather than offence. Sexual scenes and nudity were expected to be scheduled post-watershed and, generally, this was the case.

A scene from the BBC Three comedy *Two Pints of Lager* was more verbally explicit then *Holby Blue* but caused little concern amongst our groups. Our respondents saw this as a comedy first and foremost rather than a serious sex scene; comedy was regarded as very much a matter of taste and shows such as *Two Pints* were unlikely to be watched by those who would take offence at the content.

4.2. Sexual Innuendo

Sexual innuendo has always been a staple of British comedy, not least on BBC Radio 4 which has a healthy tradition of outrageous material that rarely offends

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[9] *Figure 6: Issues of concern in the media relating to morality, values and standards of behaviour.*

its audiences. Our inquiry decided to re-examine our assumptions surrounding innuendo by asking our groups to listen to a relatively recent example of innuendo, rather than established favourites such as *I'm Sorry, I Haven't a Clue*.

The clip was taken from *4 Stands Up*, which broadcast on Radio 4's traditional comedy slot, 6.30pm. The comedian Rhod Gilbert is featured explaining to his audience how the family dog fathered his younger brother. Those listening had hardly any concerns about the piece and felt it was genuinely funny and met their expectations of quality. The faint suggestion of bestiality was felt to be absurd and, critically, left almost entirely to the imagination of the listener rather than being spelled out. The very few who did have concerns mentioned the time of broadcast, although most realised this was a well-established slot for adult humour on a radio station which was very rarely listened to by children.

4.3. Sexual candour and personal privacy

The issue of sexual candour and the related areas of personal privacy and respect are relatively new territory in the debate over taste and standards in broadcasting. The "kiss and tell" story has long been a staple of tabloid newspapers; more recently, Britain has seen a host of new magazines based on celebrity gossip and revelation.

Our research indicated concern about newspaper intrusion into the private lives of individuals and also similar intrusion on television and radio. There is clearly a distinction in the minds of the public between those people who do not seek publicity and those individuals who strive to achieve or maintain public attention by revelations about their own lives.

A few groups were shown a clip from the ITV2 series *Katie and Peter: the Next Chapter*, which was broadcast in 2008. During the programme, the couple vie with each other in descriptions of oral sex, fully aware that they are being filmed. Many people in our groups found the clip difficult to watch. The mitigating factor was a feeling of "what do you expect from them?" but this low expectation was counter-balanced by a fear that to broadcast it was to legitimise an unacceptable level of vulgarity.

Most people felt this content belonged solely on digital channels. And some members of the research groups expressed the view that the BBC could not broadcast this type of material on any of its channels.

Katie and Peter: the Next Chapter must also be seen as part of the changing media landscape as a whole. Katie Price is a successful business woman and a strong personality who has emerged as one of the most popular role model for girls and young women. A recent *Panorama* investigation on sexual bullying featured children as young as ten years old who were allowed by their mothers to watch the ITV2 series .

Frank discussion of sexuality and sexual revelation on television, newspapers and magazines is increasingly the norm and is enjoyed by a significant section of the public. However, such strong material and personalities inevitably polarise audiences and, for some, this type of explicit content was unacceptable on television.

Intrusion into an individual's private life was stated as a reason for objecting to the broadcasting of content on television, but it was not a major cause for concern. But for radio listeners, intrusion was a much more important issue. Of the 13% who had heard something they felt should not have been broadcast on the radio, 40% of them cited intrusion into people's private lives as the main reason it shouldn't have gone out. This may reflect the impact of the Ross/Brand affair (broadcast on Radio 2) and public concern over the invasion of privacy in that case; listening figures make it clear that the vast majority of respondents had not actually heard the broadcast in question but would instead have read about it or seen items on the news relating to it.

In this context our research sought to discover whether the increased use of new media, especially the internet and mobile phones, led or was perceived to lead to a corresponding lack of care for or understanding of individual privacy and boundaries. We asked both adults and children/young people whether they felt that frequent sharing of personal details, photos etc on social networking sites such as MySpace, Facebook or Bebo or on MSN inevitably led to a blurring of private/public boundaries.

The public did not feel this question was relevant. They felt that posting thoughts, feelings and photographs in a semi-public space such as a social networking site was still under their control and not a matter of concern for them in terms of privacy. An individual's decision to share relatively personal issues with a wide circle of people did not mean they were less careful about their own sense of privacy or that of other people.

4.4. The portrayal of women in comedy and entertainment programmes

In setting out the terms of reference for this report, the BBC sought greater clarity from the public about their attitude towards the treatment of women in entertainment shows, and, in particular, whether there is any general sense of sexism or misogyny in BBC entertainment or comedy.

Our audiences did not spontaneously reflect any disquiet concerning the portrayal and participation of women on television or radio. More broadly, however, some respondents expressed concern over any instances of aggressive behaviour and disliked the tone of content which they perceived to be lacking in respect, especially for age and gender.

Mockery was felt to belong largely to panel or quiz shows such as *Mock the Week*, *Have I Got News For You* and *QI*. When prompted, some viewers noted a slightly aggressive, predominantly male tone in this sort of show but few people were worried about this. It only became a concern when offensive language was used gratuitously or when the tone slipped from cleverness into apparent aggression. One respondent spoke of admiring "the intellectual jousting on programmes like *Mock the Week* and *QI*". There was a sense of clever people entertaining but also informing the audience with their humour.

As we have seen, comedy is entirely a matter of taste; many people expressed the view that comedy – and entertainers – come with their `own' licence. But we must also take note of the comments made about the "adversarial" nature of panel games and quiz shows.

Some older audiences and those viewers who like family comedy expressed the view that much of the comedy they found on television was "strong" and "male" and risked descending into what they described as "a point-scoring exercise". Whilst there was not a feeling that women were undermined in these programmes, the panel games and quiz shows were regarded by some as largely a male domain where boundary-pushing was seen as the goal, rather than a desire to provide entertainment to a wider audience.

Some research groups viewed a clip from Mock the Week where comedian Frankie Boyle made a joke about the appearance of a well-known sports personality. The groups regarded the comments as mild – they were described by some as "tame" and well within their expectations for this show. The joke was found to be neither nasty, aggressive nor bullying in tone and many were unsure why we had selected this particular clip.

An encounter between Jonathan Ross and Gwyneth Paltrow was seen as crude and deemed offensive by some, though they did not regard it as bullying. They felt Gwyneth Paltrow was complicit in the exchange and, although vulgar language was directed at her, she was not seen as a victim. The show was felt to be appropriately scheduled and, for many, the shock value was adequately circumscribed by the context of the Friday night slot and well established expectations for the programme.

There was a mixed response to a clip from *The Apprentice*. In the scene, three contestants are involved in an argument in which one man, in particular, is haranguing the only woman present in an aggressive manner and using strong language. Respondents were divided over the acceptability of the argument. A slight majority thought this showed unacceptable behaviour in the workplace and were particularly sensitive to a woman being verbally brow-beaten by a man. However, most people agreed that it was clear the man's anger was real and not contrived, and also pointed out that this sort of behaviour ultimately got its come-uppance; contestants with such little self-control invariably got fired from the

show. For some, these two factors made the clip acceptable in the context of the show as a whole.

There were very few concerns expressed about comedies aimed at a younger audience and there was no perceived negative portrayal of women for either our adult respondents or during our youth research. Modern scripted comedies such as *Gavin and Stacey*, *Outnumbered* and successors to *Two Pints* such as *Pulling*, *Grown Ups* and *Coming of Age* all have strong female characters - often seen as vastly superior to the male characters; many of these series are written or co-written by women. This genre of entertainment may be one of the reasons why our research groups did not feel unease about the portrayal of women in entertainment as a whole.

4.5. Portrayal of minorities and religion

Our audiences did not voice significant concerns about the portrayal of minorities. Ipsos MORI were conscious of the need to explore this area thoroughly in their survey and care was taken to boost the representation of minority respondents to reflect the overall make-up of society.

As in all areas of taste and standards, faith or religion played a minor, but still significant, role in determining attitudes towards the portrayal of minorities and religion.

A number of clips were provided to spark discussion in the qualitative work and two, in particular, were used frequently. The first was a sketch from the BBC One comedy series *Harry and Paul*, which showed a stereotypical "posh" Southerner urging a "dim-witted" Northerner to have sex with a Filipino maid. After broadcast, this sequence sparked a campaign of complaint from Filipinos who felt the sketch was offensive.

However, the level of concern expressed by our groups was almost non-existent. They saw that the purpose of the sketch was to satirise stereotypes rather than to make genuine judgements about different groups of people. The context of the sketch made everyone look ridiculous; moreover the talent were trusted and their intent was understood. Whilst there was some acknowledgement that the sketch could be offensive in theory, in practise it caused no offense at all.

Respondents also viewed a clip from *The Katy Brand Show* on ITV2. In the sketch, Katy portrays a girlfriend of Jesus who is jealous of those around him; it is implied that Jesus is something of a flirt, perhaps even promiscuous. The sketch contrasts the Biblical setting with the characters as very modern personalities.

The concerns illustrated by this clip were rather complex. Very few of the groups were offended by the content; however all of those who were not offended were

conscious of the clip's potential to offend others – that is, most people were aware that jokes about faith were potentially offensive to those who did hold strong religious belief. And, indeed, those who felt strongly about their religion were offended by the item and took the offence very personally. They disliked the whole premise of the scene rather than any specific dialogue.

The deciding factor here was the perceived lack of quality. Many people referenced Monty Python's *The Life of Brian* as setting the quality bar in the area of religious satire very high. They felt that material had to earn the right to tackle such a potentially offensive subject. The research groups expressed the view that if religious satire were broadcast on terrestrial channels, and in particular on the BBC, it would have to meet those high standards which had been set by previous BBC content in this area.

Religion has traditionally been a subject for humour but comedy programmes with faith as a theme did not emerge as a concern for our groups. Their reactions to both these clips seem borne out by the accompanying research survey. When asked what material respondents had seen or heard that they felt should not have been broadcast, only 16% cited material that is offensive to minority groups and 14% cited religious concerns.

4.6. Sexual content: conclusions

Sexual content on mainstream television channels and radio does not greatly concern our viewers. However, there is a strong feeling that such content - including nudity - belongs firmly in post-watershed territory. The content of pre-watershed soaps is dealt with in great detail in other research documents, most notably *Young People, The Media and Personal Relationships* (Buckingham 2003) and Ofcom's 2005 report into *Offensive Language and Sexual Imagery in Broadcasting*.

However, our viewers made firm decisions when content was felt to be either unnecessarily sexual or inappropriate for the slot (*Holby Blue*) or simply too crude (*Katie and Peter: the Next Chapter*). It was clear there is a very real expectation that the BBC will maintain high standards when it comes to sexual content in general.

The unease which young people have expressed about the pressures on them to be sexually knowing should remind broadcasters that they have a responsibility towards their viewers to ensure content is suitable for the time of broadcast. Pre-watershed sexual content is often rejected by young people for its overly moralistic approach (see Buckingham, Ofcom) but programme makers must bear in mind the real need for justification for sexual themes and scenes in pre-watershed shows.

Our research groups did not immediately respond to those clips which showed the portrayal of minorities and the behaviour towards women. When prompted, they did discuss these issues, but, as reflected in our survey, this was rarely of genuine concern. In addition, members of our groups expressed a concern that "political correctness" is sometimes too prevalent in these debates.

Expectations of the BBC are high in the area of religious satire, where audiences feel quality is the main justification for such content.

Section 5. The role of the BBC

5.1. Levels of satisfaction with the BBC

'I know a lot of people would expect me to be shocked by bad language or sex on TV but I'm not really. It's a reflection of what real life is like now. I'm more concerned that the BBC might feel inhibited or stop making good quality programmes – it's the quality of the stuff on TV that bothers me more' (Anglican priest, 32, London)

We asked the public specific questions about their perceptions of the BBC's morality, value and standards of behaviour, both about the Corporation itself and compared to other broadcasters.

Of all those questioned 68% said they were satisfied with the standards they saw on television in general; but that figure rose to 74% who said they were satisfied with the performance of the BBC's television programming.

When it came to radio, 64% said they were satisfied with the standards of radio generally; 61% were happy with the BBC's performance in particular.[10]

5.2. Channels and stations

Our research investigated this further, asking the public about their levels of satisfaction with individual channels and radio stations. We also asked which channels and stations were the most in need of improvement when it came to standards and values.

In the case of television, BBC One was the most highly rated channel in this area, with a 61% saying it had high standards. BBC Two attracted the most satisfied audiences; 56% felt the channel had high standards and only 6% felt there was room for improvement (a ratio of around ten-to-one, which means that for every ten positive responses there was one negative response).

ITV1 was rated by 31% as having high standards, with just under half that number (14%) feeling it needed to improve.

The public also evaluated the BBC's digital channels, BBC Three and BBC Four. Again, more people expressed their satisfaction with standards on the channel than concern. The approval ratio for BBC Three was three-to-one, and, in the case of BBC Four, five-to-one.

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[10] *Figure 2: Overall satisfaction with TV and Radio.*

Channel Four received 19% approval, but 29% of viewers felt standards and values needed to improve. And Five gathered 11% satisfaction but 18% felt that standards needed to improve, giving the channel a negative response ratio of almost two-to-one. [11]

As we have seen, there is very little concern about standards of behaviour and morality on radio. Consequently, many people did not feel it necessary to comment about standards on radio in our survey.

For the most part, BBC radio stations fared well amongst those who expressed an opinion. Radio 4 led the way with an average of 33% approval and only 1% felt there was need for improvement. Radio 2 registered 29% approval (5% said it needs to improve), with Radio 3 just behind on 21% (with only 1% who feel it needs to improve). They were followed by independent radio station, Classic FM with 20% approval. Radio Five Live registered 11% approval and BBC local radio stations gained 13% approval with only 1% disapproval.

However, in the case of BBC Radio 1, 19% registered their satisfaction with the standards and 16% felt there was a need for improvement.[12]

5.3. Expectations of the BBC

Generally, the public expected – and received – higher standards from the BBC than from other broadcasters. 55% of people felt the BBC should lead the pack in relation to standards. This is very much in line with previous research into a number of different areas related to taste and standards (eg. Professor Sonia Livingstone's Literature Review), with BBC One expected to be the "gold standard" in terms of all broadcast channels.

Our qualitative research asked further questions of the public to put together a more detailed view of the BBC's channels and what the public wanted to see from their main public service broadcaster.

5.4. The BBC's television channels

The perception of BBC One as a broad, mainstream channel orientated towards family viewing still holds strong for the overwhelming majority of respondents over 30. Likewise, BBC Two was generally regarded as a more niche, more serious channel intended for adults rather than for family viewing.

Audiences particularly enjoyed BBC One on Saturday and Sunday night when it provides mainstream, family entertainment. In the workshops, a number of

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[11] Key Findings from the Audience Research. *Figure 9: Opinion of TV channels in the area of morality, values and standards of behaviour.*

[12] *Figure 10: Opinion of radio stations in the area of morality, values and standards of behaviour.*

people also commented that the transfer of programmes from BBC Two to BBC One has altered their perceptions of both channels during the week.

'These days there's no difference between One and Two; there used to be, but not these days – they even have the same programmes.' (Male 35+ London)

This perception is partly rooted in the cross-over of a number of popular comedy or entertainment formats, in particular *Catherine Tate, Little Britain, The Apprentice* and *QI*. For some, this has led to BBC One developing as a more edgy channel than before. The shows are popular and successful on BBC One, but, for some of our audiences this leads to the impression that, in comedy in particular, the "bar" may ultimately be set higher in terms of tone and content.

Our audiences were broadly tolerant of strong language on BBC One, provided it met the criteria of being "necessary" or enhancing the quality of the experience. But programme makers should be aware that the unnecessary, the overly-aggressive or the un-earned use of strong language or content was a turn-off or turn-over factor for some of our viewers. These people felt themselves "excluded" from content they might otherwise enjoy by the occasional instance of unnecessarily strong language.

The public had far less to say about the BBC's digital channels, although BBC Four, in particular, was seen as delivering high quality content and there was growing recognition of the BBC Three profile and an awareness that the channel catered for a younger audience. Sections of the public are increasingly inclined to follow programme-type, personalities and performers rather than distinguish by channel, especially in the digital world. Many of our respondents were not aware of which channel or broadcaster carried their favourite programmes; it was of little concern to them. This can be partly ascribed to the increased use of PVR; recording specific content rather than recording channels is the point of PVR and the identities of individual channels are likely to recede further the more this type of technology is used.

For the BBC, the main issue identified by audiences is focused on the need to maintain the Corporation's reputation for quality: standing out in a crowded environment without merging into what our respondents regard as a host of noisy and sensationalist channels.

5.5. The BBC's radio stations

The network BBC radio stations were well understood by their audiences. Our respondents had comparatively little to say about radio in general but all of them were tolerant of their favourite stations and defensive of any perceived mistakes. This was especially the case with Chris Moyles and Radio 1. Like other strong broadcast personalities, such as Jonathan Ross and Gordon Ramsay, fans of

Chris Moyles felt you knew what you were getting when you switched on and as one listener put it, "It's for us; it's not for them."

Radio was regarded as more of a friend than television: audiences found the station with the tone that most appealed to them and stuck with it. The live nature of radio meant that listeners gave it greater leeway: an inappropriate remark or a mistake was readily forgiven as long as there was a swift and sincere apology – there was a greater tolerance for human error, just as there would be with a trusted friend.

Unlike much television programming, radio audiences are very aware of what to expect in each slot. Hence mockery is a given for the Radio 1 breakfast slot and some strong language or controversial content is tolerated in Radio 4's 6.30pm slot, or when the programme requires it.

5.6. BBC Online

As we have seen, the internet plays a significant part in the media lives of younger people. Our survey of young people found little concern amongst them about online content, mainly because they chose what to explore and consume. Going online and accessing material brings different expectations from switching on the television – online usage is usually a solitary experience so the embarrassment factor about unsuitable content which so often brings about offence for the television viewers (and, occasionally, for the radio listener) does not come into play. The online user feels in control in a way which the television viewer does not and this has a marked effect on levels of offence and disappointment with the broadcaster.

However, a significant number of groups expressed concern about content available via the BBC iPlayer. Most people believed their children would be able to access post-watershed content at the tick of a box on iPlayer. No-one mentioned the BBC's "G for Guidance" system nor were they aware that iPlayer has a parent password protection scheme which prevents children accessing adult content.

By contrast, most people were aware of the SkyPlus pin protection system and felt the BBC should have a similar system in place for iPlayer.

In general terms, this also points to the necessity of the BBC maintaining its vigilance over its online sites and ensuring that more adult material cannot be easily accessed by younger audiences. Currently, strong material or content with more adult themes cannot be immediately accessed from the BBC home page. The fact that few complaints are received about online content does not mean the BBC should relax its reputation as a safe place for children online.

5.7. Creativity, regulation and responsibility

"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 and publish innovative and challenging content appropriate to each of our services with our responsibility to protect the vulnerable. When we broadcast or publish challenging material which risks offending some of our audience we must always be able to demonstrate a clear editorial purpose."
BBC Editorial Guidelines

The public had clear views about regulation, responsibility and creativity. We asked a series of questions to establish what limits they felt the BBC should observe in terms of creativity and where the responsibility lay in determining who watched what and when.

There was overwhelming agreement that the existing regulation of television content was a good and necessary thing. 79% of our respondents were in favour of regulation. Along with the necessity of regulation, there was also a strong feeling that creativity was necessary to television and to radio. 70% of our respondents agreed that "creativity, new talent or innovative programmes should be encouraged even if some people might take offence."

Similar support was given to the idea that "it is more important to protect freedom of speech than to worry about causing offence to other people" (65%) and a similar amount of people supported the BBC's right to show edgy material: "the BBC should not be afraid to show material that some people might find offensive." (61%)

This tolerance is further supported by the fact that 73% of our respondents felt that people were too easily offended by what some people say. Alongside a desire for strong and careful judgements when it comes to content on television and radio, there is clearly a feeling that there must be leeway for creativity and more tolerance for the ill-judged remark or the material that falls short of its mark in terms of taste and tone.

Perhaps some of this tolerance is down to the fact that most of our audiences feel that they have as much responsibility as the broadcaster in making decisions about the appropriateness of content they watch or listen to.

We asked our audiences where they felt the responsibility should lie for making sure adults/children do not see or hear a programme or content that they might find uncomfortable or offensive or which might be unsuitable for someone of their age. 57% of people felt, as adults, the responsibility lay primarily with themselves; 26% felt it was equally their own and the broadcaster's responsibility.

When it came to deciding what children watched or listened to, 62% of those questioned felt that they, as adults were primarily responsible; 27% thought the responsibility was equally their own and the broadcaster.[13]

Our research reflected an appreciation of programme information (such as billings, warnings and presentation announcements) as additional help in assessing the suitability of content. Although there was a strong feeling that well-established programme brands and personalities came with their own in-built warnings, our audiences still felt programme information announcements were useful tools. In addition, there was some support for the use of bleeping within programmes to render content suitable, but these were described by some as largely being "Band-Aids" simply being placed over the wound.

5.8.   The role of the BBC: conclusions

"Producers have to think carefully and really know what they are doing when it comes to programme making. Performers need to be able to trust their producers to help them and guide them; it should be clear that the producer is in charge. It is a big responsibility, but a necessary one."   (John Lloyd)

Expectations of the BBC remain very high, and in general audiences believe that its main television and radio networks maintain a high standard of morality, values and behaviour, far ahead of other broadcasters.

Although there is still awareness of the distinctive roles of BBC One and BBC Two, they are seen by some to be increasingly similar, with edgier content on One and more mainstream programming on both channels.

Of all the BBC's services, Radio 1 has the most divided response in terms of morality, values and behaviour, between those who believe it has high standards (19%) and those who think it needs to improve (16%).

The BBC's challenge of serving all audiences will become harder, not easier, as technology fragments consumption still further and the cultural diversity of the nation increases. The BBC aims to provide a range of content targeted, as far as possible, to appeal to the very wide demographic of audiences who fund it. As the often-used analogy goes, the BBC is a bus rather than a taxi; it cannot provide a personal service tailored to each individual's tastes.

The Corporation must be vigilant in ensuring that the less media literate, especially those in older generations, are not left with the impression of being marginalised. It is a difficult balance: the older generation in particular will always look back to what they see as a more agreeable past, but the BBC needs to continue to create and help them to discover contemporary content which appeals to their sensibilities.

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[13] Key Findings from the Audience Research. *Figure 5: Where does the responsibility lie?*

Conclusions and Recommendations

This is a complex subject, and one where attention to the nuances and details of audience attitudes will add to the overall quality of the BBC's editorial service. For that reason, programme makers should read the most relevant parts of the detailed audience research that accompanies this report.

The research shows a high degree of thoughtfulness and sophistication in the audience's approach to questions of taste and standards. The messages we received from the public are sometimes contradictory; a concern, for instance, over creeping 'normalisation' of strong language in society, coupled with an acknowledgement that they themselves make use of it in everyday life. Navigating between contradictions of this kind is at the heart of day to day judgements made by creative professionals across the BBC.

Our response to these findings is divided into conclusions – which underline or reinforce current practice in the light of the new research – and recommendations, which highlight specific areas for change.

Conclusions

1. Audiences accept potentially offensive content but believe it should be there for a purpose. They have a sophisticated sense of different programme genres, from serious documentary to reality and entertainment. Producers should ensure that any potentially offensive material has a clear editorial purpose and ask themselves is it necessary? Does it enhance the quality of the experience for audiences?

2. Viewers understand and value the television watershed. The BBC must respect and maintain its significance as a crucial contribution to audience confidence in television standards. There is no audience demand for a radio watershed.

3. Of all BBC services, BBC One is the most sensitive, because of its ability to unite generations and families in shared viewing. The bar for the strongest language between 9pm and 10pm must therefore remain significantly higher than on other BBC television channels.

4. On all channels, producers, presenters, commissioners and controllers have a shared responsibility to ensure that the force and value of the strongest words is not weakened by over-use. The mandatory referral of the most offensive language to Channel Controllers reflects this and must be maintained.

5. Mischievous banter, practical jokes and formats, which include elements of confrontation and criticism, can all be legitimate – indeed the public tell us that they can add greatly to their enjoyment; but programme makers, on-air artists and presenters must ensure that they never tip over into malice, humiliation or harm.

6. Audiences admire performers who take risks but have the expertise to know when to draw a line. To support such talent, producers and controllers must always be candid and open with them about judgements of tone and content, and be prepared where appropriate to take and enforce tough decisions.

7. Risk-taking is as vital a part of the BBC's mission in comedy, drama and entertainment as it is in other genres. As with all programme making, the greater the risk, the greater the thought, care and pre-planning needed to bring something groundbreaking to air.

Recommendations

1. **New series on television and radio**
    For new series where questions of taste and standards are likely to arise, there must be a discussion with the commissioning executive early in the production cycle to agree appropriate parameters of tone and content, to ensure that all involved – including presenters and performers – have given thought to questions of channel, context and slot. Even when a returning series has established expectations of strong language and content, there should be a similar discussion before the start of each run.

2. **Greater care over cross-channel transfers**
    When a TV series moves to a more mainstream channel - especially to BBC One - producers and controllers should be sensitive to its new context, and give careful consideration to adaptations of tone or format if necessary.

3. **Clearer policy on bleeping of strong language**
    A clearer policy should be set for the use of bleeping in TV and radio programmes. In general, where strong language is integral to the meaning or content of a programme – and other questions of slot, context channel etc have been resolved – it should not be disguised. But when in other circumstances a sequence that is editorially necessary happens to contain the strongest language, it may be right to bleep or disguise the words, even after the watershed.

4. **New guidance on malicious intrusion, intimidation and humiliation**
    BBC programmes must never condone malicious intrusion, intimidation and humiliation.   While they are all aspects of human behaviour which may need

to be depicted, described or discussed across the BBC's factual and non-factual output, they must never be celebrated for the purposes of entertainment. New guidance is needed to ensure that everyone involved in programme making for the BBC understands that malicious intrusion, intimidation and humiliation are unacceptable.

5. **Clearer audience information and warnings**
   The BBC should always recognise that some sections of its audiences are more readily offended than others. We owe the public the information they need to make informed choices about viewing and listening and to avoid material they may regard as unsuitable for themselves or their families. Each channel must make even greater efforts to ensure that appropriate content information (eg. billings and presentation announcements) is provided which enables informed judgements to be made by all audiences, both pre- and post-watershed, about programme content.

6. **Music radio**
   Music radio thrives on strong personalities, and young audiences value BBC Radio 1 highly; but editorial teams must be reminded that particular care needs to be taken at times of day, such as school runs, when different generations may be listening together.

7. **Major awareness campaign about online guidance**
   The BBC has pioneered content guidance and child protection mechanisms provided by the iPlayer. Audiences are concerned about the internet as a space of unregulated content and are insufficiently aware of the protection available for BBC content. A major campaign of public information is needed as soon as possible to raise awareness of the content guidance and offer reassurance to audiences. The BBC should also work to ensure that the next generation of Freeview and FreeSat PVRs have PIN protection functionality.

8. **More regular audience research**
   In-depth audience research, along the lines of the findings in this paper, should be conducted more often to ensure that the BBC maintains a full and detailed understanding of audience attitudes to taste and standards. To keep up with changes in audience taste, research should be commissioned every two to three years. Careful attention should be given to key tracking questions that will enable the BBC to identify changes in audience and societal attitudes.

9. **Revision of Editorial Guidelines and Guidance**
   The BBC's Editorial Policy department should use the research, general principles and recommendations in this report to inform the current general revision of the BBC's Editorial Guidelines and, in particular, to clarify audience expectations of tone and context. In addition, new Guidance will be required

to keep programme and content makers up-to-date with audience expectations of BBC content.

10. **Increased commitment to training**
    The research findings offer new opportunities to illuminate the understanding of taste and standards for programme makers across the BBC. The findings should be briefed to leadership groups in all content divisions by the Director and Chief Adviser, Editorial Policy. The Colleges of Production and Journalism should develop new training material that explores audience attitudes specific to each of the key genres, which will be rolled out to programme makers both in-house and independent. The audience research and the conclusions of this report should also be made available through normal Editorial Policy channels to all programme makers. The findings of this study and the materials used in it should inform online courses, which will be used to maintain editorial policy standards.

Appendices

Appendix A

Steering Group Members

BBC Staff Member	Title
Helen Boaden	Director, BBC News
David Bunker	Head of Audience Research, Vision
Mark Damazer	Controller, Radio 4 & Radio 7
George Entwistle	Controller, Knowledge Commissioning
Mark Freeland	Head of Comedy
David Jordan	Director, Editorial Policy & Standards
Roly Keating	Director, Archive Content
Helen Normoyle	Director of Audiences, MC&A
Andy Parfitt	Controller, Radio 1, 1Xtra, Asian Network, BBC Switch & BBC Popular Music
Claire Powell	Chief Adviser, Editorial Policy
Cary Wakefield	Director of MC&A, Vision
Frances Weil	Special Assistant to Director, Vision
Alan Yentob	Creative Director

Appendix B

Terms of Reference

This report aims to inform BBC editorial decision-making and training, and contribute to the BBC's guidance for its editorial staff. It will consider a number of key areas concerning taste and standards in broadcasting, as they affect the BBC's role within a fast-moving and diverse media landscape. The report and the accompanying research will seek to inform the debate on society's attitudes to these questions and how those perspectives should be reflected in BBC content.

In doing so it will look primarily at the following themes:

Strong language – questions of appropriateness and acceptability:
- The differing expectations of audiences regarding language across a range of programming and outlets;
- Context – how it affects the perception and reception of language;
- Underlying attitudes and trends, both current and historical, to strong language;
- The role of the creative community in relation to language and the BBC's approach to performers, production talent and editorial content across its platforms.

Sexual content – including language, imagery and tone:
- Issues of candour, respect and personal privacy and the expectations and boundaries of personal privacy and sexual allusion;
- Attitudes towards gender and sexuality in content – especially humorous content - and the role played by the creative community in helping to determine or reflect those attitudes.

Generational questions and expectations:
- The broader media landscape and the experiences of different generations and communities towards media usage;
- How that impacts on the role and audience expectations of the BBC.

How expectations are conditioned by platform, genre, channel, station and slot:
- The BBC's approach to editorial content and creative talent (performers, writers, producers) that cross boundaries of expectation on BBC platforms;
- Exploring the role of the BBC in providing appropriate content to meet the expectations and needs of an increasingly diverse audience.

- Changes in audience expectations and experiences through digital platforms, labelling, systems of guidance

As a starting point, the accompanying research will undertake a review of existing research and relevant literature. New research for the report will focus on public opinions on the questions outlined above and will engage diverse communities and demographics across the UK. The report will also include extracts from specially-conducted interviews within the creative community, where input will be provided to the BBC in confidence. In doing so it will seek to access a range of opinion that reflects informed first hand experience of the issues that would not normally be available.

The report will also inform the 2009 revision of the BBC's Editorial Guidelines.

Appendix C

BBC Editorial Guidelines on Harm and Offence and Ofcom Code

1. BBC Editorial Guidelines: Harm and Offence

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 and publish innovative and challenging content appropriate to each of our services with our responsibility to protect the vulnerable.

When we broadcast or publish challenging material which risks offending some of our audience we must always be able to demonstrate a clear editorial purpose. Such material may include, but is not limited to, offensive language, humiliation, sexual violence and discriminatory treatment. We must be sensitive to audience expectations, particularly in relation to the protection of children, as well as clearly signposting the material.

Harm and offence editorial principles
- We will not broadcast material that might seriously impair the physical, mental or moral development of children.
- We observe the television Watershed to ensure material that might be unsuitable for children is appropriately scheduled.
- We signpost and label challenging material to ensure our audiences have enough information on which to judge whether content is suitable for themselves or their children.
- We keep in touch with the expectations of our audiences for all of our services.

Audience expectations
We should judge the suitability of content for our audiences, including children, in relation to the expectations of the likely audience at a particular time on a particular day, and in relation to the nature of the service as well as the nature of the content. We should ask ourselves the following questions:
- what is the likely composition of the audience, including the likely number and age range of children in the audience taking into account school time, weekends and holidays? We should be aware that school holidays are different in different parts of the UK.
- does the talent, slot, genre or service carry pre-existing expectations which may be challenged by the content?
- is harm or offence likely to be caused by misleading the audience or in the inclusion of difficult or challenging material?
- has any difficult or challenging content been clearly signposted?

- are there any special sensitivities surrounding the slot, for example religious festivals, and anniversaries of major events?
- what is the likely "pull-through audience" ie. What is the nature of the preceding content and what kind of audience is it likely to attract?

Sign posts & content information
To ensure that our audiences are not taken by surprise, we must clearly sign post difficult content on all of our services using a combination of appropriate scheduling and content information which is simple, consistent, and factual. Whenever possible, this information should appear in press releases and other publicity, billings, Ceefax, trails, on air and online announcements, and electronic programme guides. We must consider giving clear information about the content of some pre-Watershed programmes, programmes which start before the Watershed and run beyond it, and post-Watershed programmes as well as for radio programmes broadcast when children are particularly likely to be listening.

Scheduling of programme trails
Trails for radio and television programmes that are unsuitable for children must be carefully scheduled:
- trails scheduled next to programmes targeted at children or when children are particularly likely to be watching should be suitable for that audience.
- trails for post-Watershed programmes must be appropriate for family viewing if shown before the Watershed.

Television & the watershed
Television scheduling decisions need to balance the protection of young people and particularly children, with the rights of all viewers, particularly those without children, **to receive a full range of subject matter throughout the day**. They must also be judged against the requirements of the Watershed.

The 21.00 television Watershed is used to distinguish between programmes intended mainly for family viewing and those programmes intended for an adult audience. However, the BBC expects parents and carers to share in the responsibility for assessing whether programme content is suitable for their children.

Programmes broadcast between 5.30 and 21.00 must be suitable for a family audience including children. The earlier in the evening a programme is placed, the more suitable it should be for children to watch alone. Programmes in later pre-Watershed slots may not be suitable for the youngest children. Only in exceptional circumstances can there be any departure from this rule, and then clear content information should be given, for example images that some children might find distressing in natural history programmes or in the 6 O'Clock News.

Programmes that straddle the Watershed, that is start before 21.00 and finish sometime after 21.00, must be pre-Watershed compliant throughout.

After 21.00 the post-Watershed transition to more adult material should not be abrupt and should reflect the nature of the channel and viewer expectations. The strongest material should appear later in the schedule. If sudden changes of tone are unavoidable they should be clearly signposted, for example, giving clear information about scenes of a sexual nature, violence or the use of offensive language.

Interactive services connected with television programmes must observe the Watershed. This also applies where online users provide content to a live service associated with a television programme.

Programmes must be clearly commissioned for broadcast before or after the Watershed to allow careful judgements to be made during the production process about the suitability of content. Late changes to originally agreed transmission slots, particularly any proposal to broadcast a programme before, rather than after, the Watershed, may result in significant re-editing to ensure that the programme complies with these editorial guidelines for harm and offence, particularly in relation to offensive language.

News channels
The nature of news means that it is not always possible to avoid showing material that might distress some of our audiences before the Watershed. Our international news channels do not normally operate a Watershed policy because the news is shown live across different time zones around the world. Wherever appropriate we should provide clear content information to signpost difficult images, particularly those that may be distressing for children.

Radio & online
Radio and online do not have Watersheds. Our scheduling and publishing decisions need to be relevant to the audience expectations of each radio network and online service and informed by our knowledge of when children are particularly likely to be listening or whether online content is likely to appeal to a high proportion of children. For example, children are particularly likely to be in our radio audience at breakfast time, during the school run and school holidays, which vary throughout the UK. We should also take care to ensure that the transition to more adult material is not unduly abrupt. Decisions about online apply equally to user generated content and third party websites as to content created by the BBC.

We should consider how far audience expectations are influenced by the platform on which user generated content appears. Internet-based user generated content which is also carried on television or radio may raise different expectations to the same material carried on personal computers.

We need to anticipate possible problems when broadcasting "live" radio programmes and deal with them promptly and sensitively if they occur.

We should normally play edited versions ("broadcast versions") of music which would otherwise feature unsuitable material including offensive language or violent content for mainstream daytime audiences. At night and in specialist music programmes, the original "adult" version may be editorially justified.

We should consider using on air announcements to inform listeners about programmes which contain difficult or controversial material on our speech services such as Radio 4, Radio 5 Live, the World Service and other national and local stations broadcast programmes. These services are predominantly for adult listeners and their audiences expect to hear a full range of issues and events explored throughout the schedule.

Our live online services, where users provide content connected to a television or radio programme, **should take the same approach to harm and offence as the programme itself** and should reflect the sensitivities of the likely audience.

Websites linked to specific programmes should not contain material considered unsuitable for broadcasting in the associated programmes.

Children & dangerous imitation

Children can be influenced by what they see, hear and read. We must ensure that behaviour likely to be easily imitable by children in a manner that is dangerous, must not be broadcast before the Watershed or when children are particularly likely to be in our audience for radio and online when content is likely to appeal to a high proportion of children. Very careful judgements are required about material which might lead to dangerous imitation, including the use of domestic objects in violent acts (eg. knives, hammers and scissors). Such material must not be featured in output made primarily for children unless there is a strong editorial justification.

When hazardous activities such as rock climbing, snowboarding or white water rafting are portrayed before the Watershed, we must give warnings about the dangers of imitation without expert supervision.

Violence

Our audiences, particularly children, can be upset by the portrayal of both real and fictional violence and so we should normally clearly label violent content.

When real life violence, or its aftermath, is shown on television or reported on radio and online we need to strike a balance between the demands of accuracy and the dangers of desensitisation or unjustified distress.

Our editorial judgements about violence need to consider a number of factors which, in combination, can increase the impact of violence:

- violence that is true to life and may also reflect personal experience, for example, domestic violence, pub brawls, football hooliganism, road rage, mugging.
- violence in places normally regarded as safe such as the family home, hospitals and schools.
- unusual or sadistic methods of inflicting pain, injury or death.
- incidents where women and children are the victims.
- violence without showing the effect on the victim or the consequences for the perpetrator.
- sexual violence.
- verbal aggression, particularly the use of sexual swearwords.
- suicide, attempted suicide or self harm.
- broadcast reactions of others to violence, especially those of children.
- post-production techniques such as atmospheric music, slow motion, graphic close ups and sound effects.

We should take care to ensure that individual programmes, or programmes taken together across the schedule, avoid including material that condones or glamorises violence, dangerous or seriously anti-social behaviour and is likely to encourage others to copy such behaviour unless clearly editorially justified.

Violence and the protection of children
We must ensure that verbal or physical violence that is easily imitable by children in a manner that is harmful or dangerous is not featured in programmes made primarily for children unless there it is a strong editorial justification.
We should also ensure that material containing gratuitous violence, whether verbal or physical, is not broadcast in pre-Watershed programmes or when children are particularly likely to be in our radio audience or in online content likely to appeal to a high proportion of children. Any portrayal of verbal or physical violence, or its after-effects, must be editorially justified.

Violence against Animals
Audiences, particularly children, can often be distressed by images or scenes which show human violence against animals. If the scenes are graphic but we know that the animal suffered no harm, then we should consider saying so in an on air or online announcement or caption.

Nudity
Nudity before the Watershed must be justified by the context.

Sex
In all BBC output the portrayal of sex, or the exploration of sexual issues, should be editorially justified and treated with appropriate sensitivity.

Programmes must not portray representations of sexual intercourse, unless there is a serious educational purpose, when broadcast before the Watershed, or when children are particularly likely to be in our audience for radio or in online content likely to appeal to a high proportion of children.

Programmes broadcast pre-Watershed, or when children are particularly likely to be in our radio audience or in online content likely to appeal to a high proportion of children should not portray inappropriate sexual behaviour or contain explicit sexual discussion unless clearly editorially justified.
We should provide support when online interactive areas encourage teenagers to discuss their problems. This could include addresses of a range of relevant web sites or the phone numbers of authoritative helplines.

We must be able to justify the frank and realistic portrayal of sex and the exploration of themes and issues which some people might find offensive in post-Watershed programmes.

The explicit portrayal of sex between children and adults is illegal and should not be depicted at any time on any of our services.

Language
Offensive language is one of the most frequent causes of complaint. It can be a particular source of offence in sub-titles or online.

Judgements about its use are difficult because they depend on tone and context. There is no consensus about words that are acceptable, when, and by whom. Different words cause different degrees of offence in different parts of the world. So a person's age, sex, education, employment, belief, nationality, and where they live, all impact on whether or not they might be offended.

We do not include any offensive language in pre-school children's programmes or websites (four years and under).

We must not include offensive language in programmes or websites made for younger children except in the most exceptional circumstances.

We must not include offensive 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 high proportion of children, unless it is justified by the context and then its frequent use must be avoided.

We must be able to justify the use of offensive language in challenging factual programmes, comedy and drama broadcast throughout the day on

our speech radio stations. It will also generally require clear content information.

We must not include the MOST offensive 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 high proportion of children.

We must make careful judgements about the use of the most offensive language post-Watershed and ensure it is clearly signposted.

Any proposal to use the most offensive language (cunt, motherfucker and fuck) must be referred to and approved by a senior editorial figure or for Independents by the commissioning editor and the relevant output controller for television, radio, online and any other service. Chief Adviser Editorial Policy may also be consulted.

Language that causes most offence includes:
- sexual swearwords
- terms of racist 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 offensive language.

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 exist in our society but we should not perpetuate it. We should avoid offensive or stereotypical assumptions and people should only be described in terms of their disability, age, sexual orientation and so on when clearly editorially justified.

2.   Ofcom Harm and Offence Code

This guidance is non-binding. It is provided to assist broadcasters interpret and apply the Broadcasting Code. Research which is relevant to this section of the Code is indicated below.

Every complaint or case will be dealt with on a case by case basis according to the individual facts of the case.

We draw broadcasters' attention to the legislative background of the Broadcasting Code which explains that:

"Broadcasters are reminded of the legislative background that has informed the rules, of the principles that apply to each section, the meanings given by Ofcom and of the guidance issued by Ofcom, all of which may be relevant in interpreting and applying the Code. No rule should be read in isolation but within the context of the whole Code including the headings, cross references and other linking text."

This section addresses potential and actual harm and/or offence. Broadcasters may make programmes about any issue they choose, (so long as they comply with the general law and the Broadcasting Code). The rules and this guidance cannot anticipate every situation. Moreover, social mores and sensitivities change both over time and in response to events.

Rule 2.1

We recognise that some programming may include material that has the potential to be harmful or offensive. This puts a responsibility on the broadcaster to take steps to provide adequate protection for the audience. The criteria outlined in the meaning of "context" give an indication of what this may involve. Ofcom regularly publishes complaints bulletins which provide information on matters members of the public have found harmful or offensive and Ofcom's decision in those cases.

Generally accepted standards
Broadcasters and the public view and listen to material measured against a background of generally accepted. Ofcom licenses an increasing number of satellite and cable channels, who broadcast solely to non-UK countries where different standards may apply. The understanding of what is "generally accepted standards" should be underpinned by relevant research.

Generally accepted standards will change over time and will also vary according to the context (as set out under Rule 2.3 of the Broadcasting Code).

Generally accepted standards also apply where programmes invite viewers or listeners to participate in them. Broadcasters should ensure that they take all

due care to avoid disadvantaging any viewer or listener who votes, enters a competition, takes part in a poll or otherwise interacts with a programme by participating in some way. Further guidance is provided with reference to Rules 2.2 and 2.11.

For further guidance on "generally accepted standards" please see rest of this guidance.

Rule 2.2

Although it is a fundamental requirement of broadcasting that an audience should not be misled in the portrayal of factual matters, Ofcom only regulates the accuracy of programmes *per se* in News programmes.

Nevertheless, Ofcom is required to guard against harmful or offensive material, and it is possible that actual or potential harm and / or offence may be the result of misleading material in relation to the representation of factual issues. This rule is therefore designed to deal with content which **materially misleads the audience so as to cause harm or offence**.

It is not designed to deal with issues of in-accuracy or misleading material in non-news programmes and complaints that relate solely to inaccuracy rather than with harm or offence will not be entertained.

Whether a programme or item is "*materially*" misleading depends on a number of factors such as the context, the editorial approach taken in the programme, the nature of the misleading material and above all what the potential effect could be or actual harm or offence that has occurred.

This rule does not apply to News. News is regulated under **Section Five**. In complying with Rule 2.2, broadcasters should pay particular attention to programming that encourages interaction from the audience as a contribution to editorial. Where a broadcaster's compliance system for participation by the audience is inadequate or fails, this may give rise to a breach of Rule 2.2 if the audience has been misled about the standards it can reasonably expect for treatment of its communication with broadcasters. Premium rate telephone services (PRS) are typical means by which broadcasters encourage participation.

In these cases, harm or offence or both may arise in one of two ways. Firstly, the audience's trust may have been abused, whether or not the interactive mechanism is free or charged for. Where the audience feels it has been misled or otherwise treated unfairly or negligently, this may cause serious offence; and where trust in broadcasting is undermined Ofcom is likely to conclude that harm has been caused. Secondly, where a viewer or listener has paid a premium to interact with a programme, there is a clear potential for financial harm.

Ofcom has added a new condition to television broadcasting licences1 to ensure that licensees are responsible for the management of all forms of communication they use for interaction with their audiences. The licence condition also requires verification by an independent third-party in respect of PRS voting and competition entries.

The amended licences require the licensee to ensure 'fair and consistent treatment' of audience votes in television programmes. If compliance failures in the conduct of PRS voting are established Ofcom is likely to consider that Rule 2.2 has been breached.

Voting schemes and competitions share certain characteristics, such as the imperative to aggregate interactions efficiently, the need to build in sufficient time for viewers to interact and for processing votes and entries, and the importance of contingency procedures in the event of technical or other problems. The guidance given about competition design and conduct against Rule 2.11 addresses these and should be read by licensees who run or might run voting schemes.

Ofcom is the lead regulator for the TV broadcast use of PRS. Viewers who wish to complain about any aspect of participation, typically the use of PRS by broadcasters, are encouraged to contact Ofcom directly. However, when PRS is used the broadcaster usually contracts with a specialist service provider who is required to be regulated by PhonepayPlus (PP+). Ofcom and PP+ will where necessary coordinate investigations closely and if appropriate run joint investigations.

Rule 2.3 Context and information

Offensive language
It should be noted that audience expectations and composition vary between television and radio and each medium has different listening/viewing patterns. Broadcasters should know their audiences.

The use of language (including offensive language) is constantly developing. Whether language is offensive depends on a number of factors. Language is more likely to be offensive, if it is contrary to audience expectations. Sensitivities can vary according to generation and communities/cultures.

Offensive material (including offensive language) must be justified by the context (as outlined under Rule 2.3 in the Broadcasting Code).

Broadcasters should be aware that there are areas of offensive language and material which are particularly sensitive.

Racist terms and material should be avoided unless their inclusion can be justified by the editorial of the programme. Broadcasters should take particular care in their portrayal of culturally diverse matters and should avoid stereotyping unless editorially justified. When considering such matters, broadcasters should take into account the possible effects programmes may have on particular sections of the community.

Similar considerations apply to other area of concern (as referred in the Broadcasting Code). For example, broadcasters should be aware that the use of bad language directly coupled with holy names may have a particular impact on people with strongly held beliefs which goes beyond any offence that may be caused by the bad language itself.

In addition to the editorial justification and context, broadcasters will wish to take into account:

- the individual impact of the particular swearword;
- the type of programme in which it appears. For example, in dramas and films, character and plot development may lessen the impact of such a phrase, whereas in a documentary, while a phrase can reflect the reality of a person or group, it may be less acceptable to the wider audience of viewers;
- whether information before or during the programme may lessen potential offence.

Research: Delete expletives? (2000) ASA, BBC, BSC, ITC; Offensive Language and Imagery in Broadcasting: A Contextual Investigation (2005) Ofcom; Violence and the viewer (1998) BBC, BSC, ITC

Discriminatory treatment or language (for example, matters relating to age, disability, gender, race, religion and sexual orientation)
There is a relationship between *representation* – the presence and inclusion of a diverse range of people on screen - and *portrayal* - the roles involved and the way that minority groups are presented in programmes. In standards regulation, the latter is assessed by *context* (as defined in the Code).

Research suggests that viewers and listeners appreciate programmes that are representative of the diverse society in which they live. If there is an underrepresentation, the use of stereotypes and caricatures or the discussion of difficult or controversial issues involving that community may be seen as offensive in that it is viewed as creating a false impression of that minority.

Research: Multicultural broadcasting: concept and reality (2002) BSC, ITC, BBC, RA; Disabling prejudice (2003) BBC, BSC, ITC; Representations of ethnicity and disability on television (2003) BSC, ITC

Information, labelling and warnings
Viewers and listeners are taking an increasing responsibility for what they watch and listen to and, for their part, broadcasters should assist their audience. Apart

from the general considerations given in the Code about context, giving clear information and adequately labelling content may also reduce the potential for offence.

Where a programme has dealt with a particularly sensitive issue, broadcasters may wish to provide a helpline specific to that issue.

Research: The Broadcasting Standards Regulation (2003) BSC, ITC; Striking a balance: the control of children's media consumption (2002) BBCBSC, ITC; Dramatic Licence: fact or fiction? (2003) BSC; Audio Visual content information (2005) Ofcom

Trailers and Programme Promotions

Trailers come upon audiences unawares, so that people are not able to make informed choices about whether to watch or listen to them. Broadcasters should bear this in mind when scheduling trailers which may include potentially offensive material.

Broadcasters should also bear this in mind when scheduling trailers which may include challenging material (which includes but is not limited to, the use of the most offensive language, graphic violence or sexually explicit scenes).

The requirement in Rule 2.3 that broadcasters must ensure that material which may cause offence is justified by the context, equally applies to programme trailers. Therefore, trailers including challenging material (see above) may, in principle, be permitted post-watershed, provided they are sufficiently contextualised. It is therefore expected that:

- where such a trailer is broadcast during programming that is dissimilar in content – advance information should be given; or

- where the content of the trailer is substantially similar* to the programming either side of it - no advance information may be necessary.

In such cases, where the content of the trailer is substantially similar to the programming either side of it, then, it is not likely to be necessary for broadcasters to provide further advance information if either:

- such information has already been given to the audience about the programme broadcast before the trailer (eg. "the following programme contains language that some viewers might find offensive"); or

- the likely expectation of the audience is that the programme contains challenging material and the trailer contains substantially similar material.

*Broadcasters should note the use of the term "substantially similar". Simply because programming either side of a trailer contains adult themes does not mean that any trailer would be permitted eg. audiences watching a programme containing offensive language would not necessarily expect a trailer broadcast during that programme to contain graphic violence or sexually explicit scenes.

Rule 2.4 Violent, dangerous or seriously anti-social behaviour

Broadcasters should have the creative freedom to explore areas which may raise serious social issues. This editorial freedom may extend to the style and tone of the programme as humour or dramatisation may provide easier access to difficult topics. However there are a range of activities that may be more problematic and the approach, such as information given before the programme or before an activity and the tone of commentary, is important in setting the parameters.

Late night shows featuring extreme sports or stunts have raised issues about the glamorisation of such activities. Even when scheduled appropriately, late at night, they may still raise questions in terms of vulnerable and younger viewers who may be encouraged to believe such behaviour is easily/harmlessly copied or acceptable.

Research: Dramatic Licence: fact or fiction? (2003) BSC; Violence and the viewer (1998) BBC, BSC, ITC; Knowing the score (2000) BSC, BBFC;

Rule 2.5 Suicide and self-harm

This rule reflects a continued concern about the impact of real or portrayed suicide, and self-harm, on those whose minds may be disturbed. Whilst it is always difficult to prove causality, various studies have shown that there may be a short-lived increase in particular methods of suicide portrayed on television. Broadcasters should consider whether detailed demonstrations of means or methods of suicide or selfharm are justified.

Appendix D

Audience Research Technical Specifications

Ipsos MORI

The two Ipsos MORI surveys were conducted across the United Kingdom (England, Scotland, Wales and Northern Ireland) between 7th and 25th March 2009, one among a quota sample of 2,206 adults aged 16 years and over, and the other among 237 young people aged 11-15 years old. All interviews were conducted face-to-face, in home, and the data were weighted to match the profile of the two populations.

The Blinc Partnership

The research comprised a mixed approach of:

Research Labs:
2.5 hour sessions with 20 or 30 people in 6 locations (London, Manchester, Edinburgh, Belfast, Leicester and Cardiff)

Household Depth interviews

School sessions :
Discussions with groups of 6-8 children from the same year group in school

Social Hubs:
30 minute spontaneous 'dips' into a range of real social environments.

Community Leader Depth interviews:
45 minute one-to-one contacts with people in an influential role within their local community