



**Consultation Response: Terms of Reference, Ofcom's Thematic review of Representation and Portrayal on the BBC**  
**Centre for the Study of Media and Culture in Small Nations, University of South Wales**

The Centre for the Study of Media and Culture in Small Nations produces high-quality research on the creative industries in Wales seen through the frame of small nations globally. Since its establishment in 2006, the Centre has engaged in research and dialogue with various stakeholders about the challenges and opportunities for television production in and from Wales.

In 2010, in conjunction with the BBC Trust and Audience Council Wales the Centre published [Screening the Nation](#), an empirically based report drawing on original audience research which examined the portrayal of Wales in landmark BBC television dramas (Blandford et al. 2010). It captured the centrality of television drama to audiences' own perceptions of citizenship and diverse cultural identities in Wales. In 2015, the Centre published [Television Drama Production in Wales](#), a report on BBC's Roath Lock Studios in Cardiff. It found that Roath Lock has been a very welcome addition to the television ecology in Wales that has helped raise Cardiff's profile as a centre of drama production. However, the study also found that Roath Lock, has not provided a vehicle for developing specifically Welsh content or Welsh stories. This was regarded by many of our study's participants as a lost opportunity (McElroy et al. 2015) and raises questions about the BBC's capacity to deliver authentic, diverse on-screen representations.

Representation has been discussed extensively in academic publications by Centre members (Blandford, 2010; Blandford and Lacey, 2011; Blandford and McElroy, 2011; McElroy, 2011). Centre members have also looked at the issue of absence of news content about Wales in programmes produced by the London-based broadcasters (Mitchell and Stewart, 2016) as have colleagues at Cardiff University (Cushion et al. 2017; Cushion et al. 2009a; Cushion et al. 2009b).

Based on the Centre's research expertise, we recommend the following considerations:

**(1) News and Current Affairs have a distinctive role in the representation and portrayal of a nation.**

One of the most significant ways in which BBC television 'reflects, represents, and serves the diverse communities of the UK' is through its daily news coverage. Ofcom's own data demonstrates how significant the BBC's news programmes are to audiences in Wales. News and current affairs play a unique role in the BBC's PSB mission. They are one of the most powerful ways in which UK media can inform citizens of the diversity of policy in the UK's devolved nations. An informed citizenry is a bedrock of democracy. Voters must have access to good quality representation and interrogation of policy-makers if they are to make informed choices at the ballot box.

Currently, Ofcom's proposed terms of reference do not explicitly include news and current affairs as part of the BBC representation and portrayal review. We are convinced that these genres must be included if the review is to capture audiences' perceptions of whether the BBC adequately represents 'the different nations, regions and communities to the rest of the UK'. Prominent amongst the BBC's stated 'public purposes' as set out in the [Royal Charter](#) is its

commitment to provide 'impartial news and information to help people understand and engage with the world around them ... to build people's understanding of all parts of the United Kingdom and of the wider world ... so that all audiences can engage fully with major local, regional, national, United Kingdom and global issues and participate in the democratic process, at all levels, as active and informed citizens' (section 6.1 of 2016 BBC Charter). The Review therefore needs to include an analysis of news bulletins and current affairs programmes as part of its sampling. While the Review's intended methodology appears to have a strong quantitative emphasis (including content analysis), there are some aspects of broadcast news's representation of regional and national communities that may require a more qualitative approach. The Centre has carried out some research that bears out this point, e.g. Mitchell and Stewart, 2016.

## **(2) Issues of portrayal and representation differ on Network, Opt-out and/or Catch-up television.**

The terms of reference note that '[i]t is important that the BBC represents the different nations, regions and communities to the rest of the UK.' However, it is unclear whether the review will focus on network, opt-out and/or catch-up television or all of the above. This needs to be clarified.

Our previous audience research (2010) made evident to us how audiences of BBC television content do not fully understand or distinguish between network and opt-out content. Many of our respondents, for example, were unaware of whether a specific programme was seen across the UK or by audiences in Wales only. We identified significant audience concerns about the visibility of Welsh stories outside Wales; i.e. Welsh productions on network television, as opposed to those screened solely on BBC Wales. This concern pertains to series made in Wales but which seem not to portray Wales in any significant way, thus: 'If you watch *Doctor Who* it only shows the location. It doesn't show the culture and it doesn't show the people properly. In *Doctor Who* lots of the time they are in Cardiff but they say they are in London all the time' (p.29).

Several respondents were pleased to see Wales develop as a production base for landmark series such as *Doctor Who* which have an international following, for example, 'People in America watch *Doctor Who*. It is something more worldwide. I think there's a need to push this, the fact that the Welsh...have a language of our own. There's a need for them to show this to the world' (p.90) On the other hands several respondents felt that Wales was not well represented or fairly portrayed on network, for example 'I don't see much about Wales. We are massively under-represented on the BBC. That's my feeling...in terms of an ethnic minority, I feel even more under-represented – a double under-representation' (pp.89-90).

We acknowledge that this research is now some eight years old. Much has changed and not necessarily for the better in terms of representation and portrayal. The increasing use of iPlayer makes an already complex field all the more so and means that audiences today take new routes to BBC television content.

We also note there have been important public debates (in which we have taken part) regarding the impact funding cuts have had on programmes from, on and about Wales across a range of genres including arts, comedy drama and more recently sport. In 2017, the BBC announced £81/2 million pounds investment in new content and it will be interesting to observe what difference if any this makes to audiences' evaluation of Wales' representation and portrayal on screen.

Only if audiences are clear about which services they are being asked to evaluate will they be able to answer in an informed and fair manner.

### **(3) Evaluating representation and portrayal require different approaches**

We note that the terms of reference make a distinction between representation and portrayal. We believe that questions around representation and portrayal should take into consideration the diversity of the United Kingdom and differences in terms of representation in different genres.

Portrayal is not simply about the amount of airtime that the different communities within the UK receive. Rather it is about proper consideration of the diverse identities and communities of the nations of the United Kingdom and how they appear on screen in specific genres and contexts.

Portrayal should not be reduced to good/bad role-models or stereotypes alone; the quality of television representations, the diversity of genre-based representations of Wales and life in Wales, and the range of different fictional and cultural identities being portrayed on screen all matter to viewers in different ways.

### **(4) National and linguistic identities should be given careful attention as part of the review.**

We recommend that the review should address 'diversity' not only in terms of protected characteristics, but also with regard to the different national and linguistic identities of the UK. Consideration should be given to audiences' evaluations of BBC services in Welsh and Gaelic, for example. Evidence already exists in the public domain of how audiences (both monolingual and bilingual) are already evaluating the representation and portrayal of Wales on screen. For example, Welsh-speaking audience members have expressed anxiety that the only representations of Welsh-speaking in a modern contemporary context are on S4C and therefore little seen outside Wales, while non Welsh-speaking reviewers have questioned necessity of an English-version of bilingual series like *Hinterland*:

*Hinterland was made twice: once in English and once in Welsh (where it's called Y Gwyll), though there is some Welsh dialogue in the English version...In any case, the English version seems rather unnecessary; I'd happily watch the whole thing in Welsh, or at least much larger parts of it. It's lovely to listen to – particularly compared with Danish – and I found myself wondering why Britain doesn't have more bilingual drama. (Frost, 2014)*

### **(5) Commissioners – the golden thread from commissioners to on-screen representation and portrayal**

In stark contrast to most of the BBC's audiences the network/opt-out distinction is highly pertinent for commissioners and producers of BBC content. It makes a substantial difference, for example, to the different tariffs producers receive for making what appears on our screens. We warmly welcome the fact that this review is audience-oriented. However, we believe a richer understanding can be achieved of how on-screen representation and portrayal in BBC television content is produced if consideration is also given to how the BBC commissions its content. I

If one aim of moving production outside of London is to increase the representation and portrayal of the regions and nations on-screen then questions have to be asked as to why commissioning remains a highly centralised process. We have particular concerns that the creation of BBC Studios may actually exacerbate the tendency towards centralised commissioning. Our findings have shown that many feel that Roath Lock is not providing sufficient opportunities for Welsh writers, producers, directors and actors.

We hope you find this useful and we would be happy to share further thinking or engage in further dialogue if this is useful to Ofcom.

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On behalf of the Centre for the Study of Media and Culture in Small Nations,  
University of South Wales,  
27 March 2018**

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