



Jacquie Hughes  
Content Policy Director  
Ofcom  
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28<sup>th</sup> July 2017

Dear Jacquie,

Further to the BBC's interim Annual Plan, we thought it would be helpful to set out more details on our plans to improve the BBC's portrayal and representation of audiences in the nations and regions.

The fourth public purpose covers twin requirements for the BBC to: a) reflect, represent and serve the diverse communities of the United Kingdom's nations and regions across its output and services, and b) distribute its production resources across the UK ensuring that it supports the creative economy in the nations and regions.

As set out in the BBC's response to Ofcom's consultation on the draft Operating Licence, our view is that a focus on value and sustainable production centres is the best way of meeting these objectives. The proposed hours quotas (on top of expenditure quotas) would be a blunt instrument for improving portrayal and would be counter-productive. There is not a direct relationship between hours quotas and on-screen portrayal. The genres that drive volume tend to be daytime and factual entertainment – which are not the genres which deliver the strongest portrayal impact for audiences. The higher cost, lower volume genres - comedy and drama - are the ones which tend to deliver the greatest impact where they include authentic representation.

A more effective, *alternative* approach to the proposed hours quotas is for the BBC to have a clear creative commitment – in its Annual Plan - to reflect and represent the whole of the UK, build this into our commissioning priorities and report on progress annually.

### **What we understand by portrayal**

Network TV programming is a powerful way by which the BBC can portray the people of the UK to themselves and to each other. In spite of high consumption of BBC services, there remains a deficit in the perceptions of portrayal in some of the nations and in some English regions.

However, portrayal is complex and driven by a number of factors. While there is no single indicator, our research shows that:

- It is not about quantity – portrayal is not about counting hours of programming: one high-profile drama, for example, can shift the dial for audiences more than hours of daytime factual which happen to be produced in a particular area.

- The creative idea comes first – aiming for ‘good’ portrayal cannot be a mechanistic exercise and will only have an impact if part of high quality programmes.
- Relevance and authenticity are key – reducing ‘bad’ portrayal is as important as increasing ‘good’ portrayal.

This means that the BBC must attract and invest in the on-screen talent, the writers and the producers who can deliver these things with ambition and universal appeal. As with all creative strategies, improving performance will take time and sustained effort.

### **BBC’s plans for network TV**

Our over-arching creative commitment is to tell the stories and reflect the lives, people and places of all four nations in ways that are compelling for audiences across the UK. Our network TV content strategy for this year will focus on fiction genres (e.g. drama and comedy), supported by factual genres where possible, to show:

- universal stories in a specific location (e.g. *The Fall*, *Boy meets Girl*, *This Farming Life*)
- stories specific to a location but with universal appeal (e.g. *Three Girls*, *The Moorside*, *Shetland*, and *Peaky Blinders*)
- programmes which reflect the landscape, culture, history of a place but with wider appeal (e.g. *Dunblane*, *Aberfan*, *Hull City of Culture*)
- authentic experiences, locations, customs and accents (e.g. *Happy Valley*); and
- specific locations in a regular strand (e.g. *Countryfile*, *Antiques Roadshow*, *Question Time*)

This creative approach will be underpinned by a number of new initiatives:

- Portrayal objectives. All TV genre commissioners will have specific objectives to improve nations and regions portrayal, tailored according to genre/nation.
- Nations network drama commissioning editors and a Portrayal Fund. The commissioning editors responsible for each nation will have a brief to develop talent and identify creative opportunities in the slate. The Portrayal Fund – c£2 million - will help develop talent and ideas with the specific aim to drive portrayal across all genres.
- BBC Writers Room – designed to support writing talent for BBC TV – has been extended from London and Manchester to Glasgow, Cardiff and Belfast, and will seek to develop the next generation of writers in the nations and regions; and
- New network strand. *Our Lives* is a new peak time BBC One documentary strand aiming to portray local stories to the UK, with commissioning devolved to the nations’ own commissioning editors.

These new initiatives will complement the BBC’s network TV investment commitments in the nations and regions, and the new investments announced in each nation and set out in the Annual Plan.

### **Tracking progress**

We will include representation and portrayal in the BBC’s new performance framework. At the network TV level, we will measure progress via general impression, share gaps by nation/region vs UK averages, and audience measures including whether the BBC’s services reflect ‘people like me’



and 'reflects my nation to the UK'. We will track performance against these metrics, report annually and use the data to further enhance our editorial strategy as necessary.

Ofcom will be able to hold the BBC to account for the extent to which this creative strategy is delivering against the portrayal and investment objectives set in the Operating Licence.

Yours sincerely,

A handwritten signature in blue ink that reads 'J. Heath' with a long, sweeping underline.

James Heath  
Director of Policy, BBC