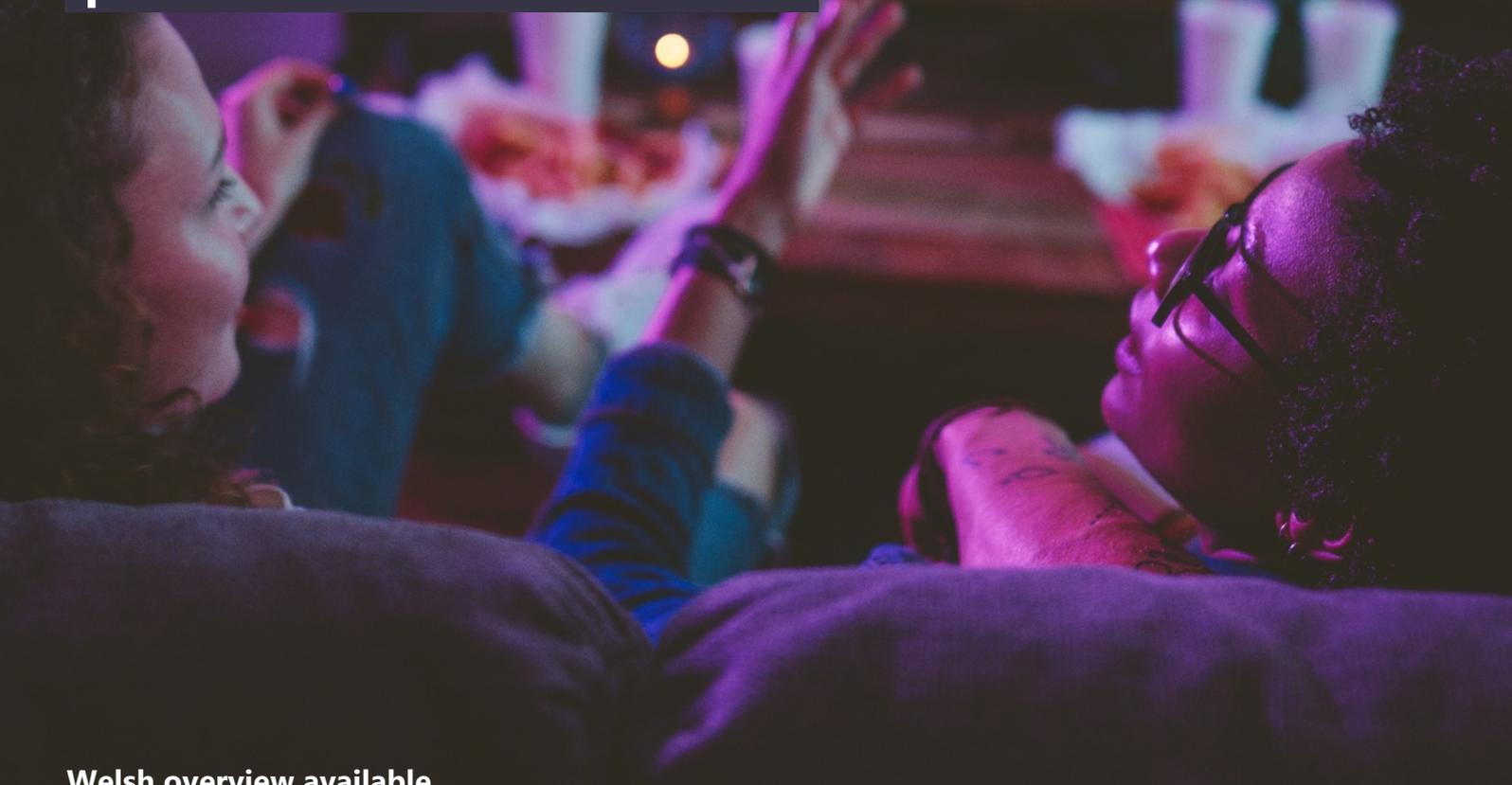




April 2020

Audience expectations in a digital world

Ipsos MORI research for Ofcom



Welsh overview available

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Tony Close, Ofcom Director of Content Standards



People in the UK are passionate about what they see and hear on TV, radio and on-demand. And thanks to social media, ‘watercooler’ debates about programmes today are more animated and immediate than ever.

Word spreads quickly about ‘must-watch’ programmes that engage and inspire people; those that typify British culture and bring the nation together; and those that move us to tears. But equally, viewers and listeners know when broadcasters get it wrong or fall short of the standards they expect.

A crucial part of our job at Ofcom is to listen to these views and act on them wherever necessary. Last year, that meant assessing around 28,000 complaints and reviewing almost 7,000 hours of programmes.

But complaints figures are only part of the picture. It’s important that, from time to time, we carry out extra research to really understand viewers’ and listeners’ concerns, needs and priorities. This helps us to ensure our broadcasting rules remain effective and up to date.

We know that audiences’ tastes, attitudes and preferences change over time. And we’ve seen significant shifts in social norms that have changed the kind of content they’re choosing to watch. A dating show entirely premised on full frontal nudity, even post-watershed, was once unthinkable. Nasty Nick’s dastardly deeds in the first series of Big Brother, which offended many in 2000, would seem less remarkable now after two more decades of reality TV. And racial stereotypes that were a feature of some comedy shows in the 70s and 80s are unacceptable to modern audiences and society.

The people who took part in the research overwhelmingly agreed that rules protecting children from unsuitable content remain essential. And they also felt that tougher rules should be applied to online content. There was a clear call for action to be prioritised against content that incites crime or hatred, or discriminates against groups or individuals, over other offensive content such as nudity or swearing.

Our job is to listen to those concerns, and balance people’s right of protection against their right to receive a range of information and ideas, and of course broadcasters’ right to freedom of expression. We want to make sure that we’re doing the best job we can in upholding standards on TV, radio and on-demand services. And the research offers an important window into the hearts and minds of modern-day audiences. This will help inform how we apply and enforce our broadcasting rules on their behalf.

Executive summary

Ofcom commissioned Ipsos MORI to conduct research to help them understand how audience expectations of audio-visual content are evolving in a digital world. The research explored participants' changing attitudes towards content standards and their experiences of programmes across platforms including: TV, radio, catch-up, subscription and video sharing services.

The research involved deliberative workshops with members of the public across the UK and mini-groups and in-depth interviews with specific groups. Fieldwork was conducted between 26th September and 19th November 2019.

Participants recognised and valued the increasing choice of audio-visual content available. This choice gave some a greater sense of control because they felt they actively selected more of what they watched and listened to. They compared this to broadcast TV and radio, where they may accidentally come across content they would otherwise avoid.

Participants thought people should be largely responsible for deciding what they watch and listen to. They wanted regulators and broadcasters to ensure content is in line with people's expectations, so audiences can make informed choices.

There was limited awareness of the detail of current regulation and some confusion about how this applies, particularly for catch-up, subscription and video sharing sites. There was also confusion about whether UK rules applied to channels that broadcast content produced outside of the UK or not in English, including among some participants from a minority ethnic background.

Having been introduced to the Broadcasting Code including definitions of harmful content, offensive content and freedom of expression¹, participants thought all the rules were important and there was little appetite for changing them:

- Participants overwhelmingly agreed it was essential to protect children from inappropriate content and wanted rules to cover this. However, parents were seen as having primary responsibility for the content accessed by children.
- Participants felt there were challenges around applying the rules for offensive content given its subjective nature. They focused on people knowing what to expect so they can make informed choices, for example, by having access to clear information about the content in programmes.
- Despite this, there was widespread agreement across participants that societal norms around offence have shifted in recent years and this should be reflected in the way Ofcom regulates offensive content. Participants prioritised addressing discrimination aimed at specific groups over other types of offensive content.
- Harmful content was considered more serious than offensive content, with strong concerns about the impact of harmful content on attitudes and behaviours. As discussions progressed,

¹ Freedom of expression is everyone's right to hold opinions without interference and to seek, receive and share information and ideas.

participants increasingly felt that adults (specifically vulnerable adults) and society overall could be affected by audio-visual content. This challenged their initial view that adults should decide for themselves what to consume.

- The potential for harm was often discussed when considering the different rules in the Broadcasting Code. In particular, rules around crime, disorder, hatred and abuse were very important to participants and strongly linked to potential harm. They emphasised how content which incited hatred or crime should be prioritised by Ofcom, even if this was on smaller channels or stations.

When giving their views on clips played to them and hypothetical 'programme scenarios' shown during discussions, participants typically considered three broad questions:

What was broadcast: including the specific words, images, tone, sounds and storyline. Participants considered whether the example included a range of different factors such as graphic or repeated nudity, strong sexual or violent content, or offensive or discriminatory language. They also considered whether they thought the tone used in the example had the potential to be upsetting or was targeted at a specific individual or group.

Why it was broadcast: Participants reflected on why they thought content had been included in programmes. They made assumptions about the motivations of programme makers, presenters and broadcasters. For example, they considered the programme genre, with different motivations linked to documentaries or news compared to drama or comedy.

How it was broadcast: Participants focused on whether people might accidentally come across content they would not want to watch or listen to. They considered several factors which could help manage participants' expectations about a programme, allowing viewers to make an informed decision:

- The timing of a broadcast, often relying on the watershed as a marker for different types of content.
- The reputation of presenters, channels or stations and individual programmes – as well as genre.
- Whether a range of different views were included, particularly for controversial themes providing multiple perspectives on a subject.
- Information about a programme such as appropriate titles, clear descriptions and accurate warnings.

Participants typically considered all three of these questions – often trading off characteristics they felt made the example more or less acceptable – before coming to their final view. Further details of their attitudes towards different clips and scenarios are included in this report and in the accompanying 'Clips & scenarios' report.

There was some acceptance that different rules could apply to different platforms. Attitudes were influenced by the extent to which participants felt in control:

- There was a strong desire to maintain the current rules for TV and radio because participants felt audiences were more likely to come across content by accident on these platforms.
- Many participants were more comfortable with catch-up and subscription services having fewer rules than broadcast TV and radio. This was because they felt they had an active choice in selecting content and were therefore more in control on these platforms. However, they assumed that if a programme had previously been broadcast on TV or radio, it would follow the same rules when accessed online.
- There were concerns about a perceived lack of rules on video-sharing sites, where participants were worried about accidentally coming across inappropriate or upsetting content. Rolling playlists, pop-ups, and unchecked user-generated content were common worries. However, there was concern about the feasibility of increasing regulation online.

1 Introduction and background

Warning: this report contains offensive language and graphic descriptions which may cause offence.

Ofcom commissioned Ipsos MORI to conduct research to help them understand how audience expectations are evolving in a digital world. The research explored participants' changing attitudes towards content standards and their experiences of programmes across platforms including: TV, radio, catch-up², subscription³ and video sharing services⁴. It provides an updated picture of audience expectations, building on previous research commissioned by Ofcom in 2014 and 2011.

This study involved six day-long (six hours) deliberative workshops with members of the public across the UK. In addition, the research involved nine mini-groups and 24 in-depth interviews with specific groups: participants from a minority ethnic background, LGB participants, participants aged 16 to 21, transgender participants and disabled participants. Fieldwork was conducted across the UK between 26th September and 19th November 2019. Further details of the methodology are included in the appendices to this report.

Throughout the research, views differed both within and between different demographic groups and locations across the UK. However, there were also many similarities between participants and a wide range of factors influenced views. This included their personal preferences, experiences and values. The findings suggest that these differences, particularly among those in minority groups, could be explored further.

This report provides a summary of the key themes from across the research. During the discussions, participants were played a number of audio and visual clips and shown a range of hypothetical 'programme scenarios' to stimulate discussion about how content standards could be applied. These scenarios were developed to support discussions, although many were based on themes from real programmes that were broadcast on TV or radio, or available online. This report focuses on the main examples used in the workshops, a summary of which are provided in Chapter 4. It also brings together the overall findings that emerged across the study. Detailed findings about participants' attitudes towards all the clips and scenarios involved in the research are available in the 'Clips & scenarios report'.

Throughout, we have referred to "participants" and provided evidence through verbatim comments which have not been attributed to protect anonymity. Quotations have been attributed providing information on key characteristics such as location and how they were involved in the research. We have also provided information on the approximate age of participants at the public workshops.

² An example of a catch-up service is the BBC iPlayer.

³ An example of a subscription service is Amazon Prime.

⁴ An example of a video sharing service is YouTube.

2 Experiences and expectations of content standards

Navigating what to watch and listen to

The way people access content has changed fundamentally

There is now a much greater choice of audio-visual content available on many different platforms and devices.⁵ This was an important shift identified by participants of all ages as they reflected on how their media habits have changed in recent years. People are increasingly watching and listening to content at any time and in any place. Many participants said they frequently access content through catch-up and subscription services instead of, or in addition to, broadcast TV and radio. They also described consuming content through multiple devices.

"I love watching what I want, when I want, and some of the original Netflix content is really good." [London workshop, 36-55]

People were perceived as responsible for choosing the content they consume

Overall, most participants valued the variety of content available across platforms and emphasised the importance of having a choice over what they consume. They said rules were important to protect viewers but felt that people were largely responsible for deciding on the appropriateness of the content they choose to watch or listen to.

"I would know what would be my trigger. If you want to have a rough idea, you can work out if it's for you. You're responsible for your own knowledge." [London workshop, 18-36]

Although participants emphasised the importance of people protecting themselves and their children, they felt regulators and broadcasters also played a role in ensuring content is appropriate and reflects consumers' expectations. This was seen as important for enabling people to make informed choices.

"It's as much the responsibility of the parent as it is on the broadcaster. If they're on their iPad in the room, you need to be aware that you've got the right restrictions on their device." [Solihull workshop, 36-55]

Increasing choice gave some participants a sense of greater control

In many ways, recent increases in the diversity and accessibility of the content available across platforms have given participants a greater sense of control over what they watch and listen to. As well as greater choice, they mentioned having easy access to programme descriptions and trailers through online platforms. There was an acknowledgement that where these tools are available, they provide helpful guidance on whether content might be offensive or inappropriate.

⁵ Discussions focused on what participants watch and listen to on any device including: broadcast TV programmes (including films), music and shows on the radio, programmes on catch-up services, programmes on video on-demand services you pay for and programmes, trailers, clips, short films or user-generated videos publicly shared on video sharing platforms. The following were not included: the press (online or print), social media (tweets, photos, comments), adverts and gaming.

“Maybe that’s why I think there’s less violence, because I choose not to watch it.”

[Perth workshop, 18-36]

They also noted the option to report content and occasionally discussed the role video-sharing sites play in removing clips that are potentially harmful. However, there was uncertainty about the criteria used to make these decisions.

By contrast, the easy accessibility of content led some participants to feel they lacked control, particularly on video-sharing sites. They worried about coming across offensive or harmful content unexpectedly on these platforms and felt that it can be easy to view something upsetting without meaning to. There were also concerns about the addictive nature of watching through catch-up, subscription or video-sharing sites that automatically start playing the next episode or other related content.

“I don’t think we’ve got control on YouTube.” [Solihull workshop, 54-85]

Switching off content was an important way participants protected themselves and others

Participants frequently described how they would switch off a programme if they accidentally came across something they did not want to watch or listen to, on any of the broadcast and online platforms they used. This was often seen as the main way people could protect themselves when watching or listening to broadcast TV or radio, compared to accessing content online where they felt individuals had a greater opportunity to select what to watch or listen to.

“[On TV] you’re watching it and you don’t know what’s going to happen, and you have to go with the flow. I don’t know, your only option is to switch it off. But then with on-demand, I can pick what I’m watching, and I can read about it beforehand.”

[Perth workshop, 18-36]

Overall, it was seen as an individual’s responsibility to decide whether something is appropriate, either by researching a programme in advance or by stopping and switching to alternative content if they decide it is not for them. The availability of a larger number of programmes was seen as providing the choice for people to find something suited to their tastes or circumstances.

Participants also used on-screen or audio warnings and age ratings to identify what to watch or listen to, seeing this as a key source of information about a programme. However, there were some concerns about the effectiveness of warnings as audiences could easily miss or skip the introduction to a programme or start watching part way through.

“[The warning] makes me aware of what’s coming up. I’ll give it 30 seconds to see if I’m OK with it.” [Newcastle workshop, 18-36]

Protecting children

Parents were seen as having primary responsibility for ensuring content accessed by children was appropriate

Participants widely felt it was a parent’s responsibility to monitor their children and protect them from inappropriate content. This was seen as easier to manage for TV and radio because these platforms were more familiar. For example, participants felt able to find appropriate content on channels and stations

children are likely to watch or listen to, including using the watershed as a guide for what to expect. A few suggested the watershed should be extended to catch-up and subscription services, with stronger content only available at times when children are less likely to be watching. However, there were concerns that applying a watershed to this type of online content could prevent adults from watching programmes through these services at a time that suited them.

Video-sharing sites were regarded as more difficult to monitor because of the lack of control over features such as pop-ups and rolling playlists. As such, some parents felt they had to watch clips with their children, rather than leaving them unsupervised.

"YouTube worries me as a mum with young children. They know how to use everything these days. If they are watching something, what worries me is what comes on automatically afterwards. I think YouTube is good and has a place, but I wouldn't leave my kids alone with it." [Newcastle workshop, 36-55]

Participants described using a range of tools to protect their children from consuming inappropriate or harmful content, although the extent to which they were used varied considerably:

- **Tools to restrict children's access.** This included restricting access to TV after the watershed, setting up age-appropriate profiles on online platforms (e.g. a children's profile on Netflix), using PIN codes and passwords and parental filters on their home internet connection.
- **Tools to help decide on what to watch or listen to.** This included verbal warnings, age ratings (U, PG, 12, 15, 18) and age-based reviews to help decide whether content was appropriate.

These tools were often combined with monitoring, such as checking recently viewed videos on catch-up or subscription services, or through apps on children's devices. Participants also emphasised the importance of having open conversations, encouraging children to share experiences to find out more about what they are consuming. Building an open and honest relationship was seen as crucial, particularly as participants felt that children were often able to bypass tools restricting access to content.

"When I was a bit younger, I learnt all the passwords and ways around firewalls etc because we had to set these up for our parents. We would self-regulate what we watched. . . and we would just watch what we thought we could watch. We would be more careful with parents around." [Bridgend/Cardiff workshop, 18-36]

Similarly, younger participants saw the ability to use parental controls and age appropriate profiles as a way of protecting children and young people from inappropriate or extreme content. However, they recognised how these tools can be easy to work around and felt that many of their peers or those younger than them would be able to access inappropriate content easily.

"I feel like the whole rules thing on TV and stuff...I don't know how they do it, but the whole age restriction on stuff like... I get it's kind of set in place for cinemas, but anyone can watch anything at home." [Dundee, paired young person depth interview]

Awareness of current standards and regulation

There was limited awareness of the detail of the Broadcasting Code, beyond some knowledge of rules to protect children

Participants were not familiar with the rules for broadcast TV and radio set out in the Broadcasting Code. This meant they struggled to describe in any detail the standards they felt applied to these platforms. Despite their limited knowledge, most participants thought rules were in place, particularly to protect children. There was confusion about whether rules applied to channels that broadcast content produced outside of the UK or not in English. Some participants in the Pakistani, Indian and Bangladeshi mini-groups were unfamiliar with Ofcom and unaware of the Broadcasting Code or that it applies to UK-regulated channels and stations aimed at their communities. They were concerned at the perceived lack of regulation and did not think rules were in place for content aimed at their communities, particularly content that was produced outside the UK.

The watershed was frequently mentioned as an important tool for protecting audiences including children, although some participants were unclear about its role and current timings. In some cases, participants also questioned the relevance of the watershed for TV today, reflecting on the variety of ways to access content. They pointed out that the watershed does not apply to content consumed through different online catch-up and subscription services, where programmes are available at any time. However, the watershed was still regarded as an important tool for protecting audiences, signalling the likely content of a programme, and acting as a useful guide for what to expect from broadcast TV.

“The watershed is 9pm and anything before should be suitable. Since I found out that some things filter through before the watershed, I’m a bit more mindful. I’d say [as a parent, I’m careful about] anything after 6.30pm.” [Glasgow, Jewish mini-group]

Recent media stories and personal experiences informed participants’ understanding of the rules

Some participants thought there were other rules about what can be broadcast on TV and radio, beyond those designed to protect children. However, they generally found it hard to describe what these might be beyond an assumption that very graphic or offensive content might not be permitted.

Reflecting on their recent experiences of consuming content and news stories, participants thought there might be rules about news impartiality and advertising brands and products. For example, in some cases, they recognised that showing a logo featuring the letter ‘P’ at the start of a programme was a way of signalling product placement. Similarly, some participants thought there were rules around discrimination based on ethnicity, gender, sexual orientation or religion for TV and radio, although they were unsure about the details.

“Things like homophobia, racism, antisemitism that sort of thing would definitely have to be censored.” [Manchester, transgender depth interview]

There was a sense that the audio-visual content people can access across different platforms has become generally more extreme over time, with questions about whether content standards may have been relaxed. In some cases, participants emphasised the graphic nature of certain TV programmes, describing images of medical procedures, extreme violence, nudity, sex and swearing. However, most welcomed the

choices they had in a digital world and felt they rarely, if ever, came across content they personally did not want to watch or listen to.

"I don't notice especially graphic content on TV anymore. I don't remember when I last saw a warning on live TV." [Bridgend/Cardiff, 18-36]

Participants thought regulation differed across platforms – although there was confusion about how or where rules applied

Based on their experience, participants generally felt there was greater regulation of **TV and radio**, with more rules compared to online platforms and services. TV and radio were generally considered together, with participants focusing on what and how content was broadcast rather than assessing content based on the platform it was broadcast on.

There was some confusion about what rules apply to online **catch-up and subscription services** that enabled people to view programmes previously shown on broadcast TV. One reason was that participants described being able to access a wide range of content, regardless of the time of day, through these online services. Participants expected these programmes would have been produced to comply with existing rules for TV and would therefore be covered irrespective of how they were accessed by audiences. They did not tend to see original content produced for subscription services like Netflix and Amazon Prime differently, grouping this with shows created for broadcast TV.⁶

As described further in Chapter 5, many participants understood why there might be different rules covering broadcast TV and radio compared to online platforms. They often felt more comfortable having fewer rules on catch-up services compared to TV and radio because they felt they had an active choice in selecting content and were therefore more in control on these platforms.

The perceived lack of regulation on **video-sharing sites** was something that worried participants in general.⁷ They felt audiences could find more graphic content on these services compared to other platforms, for example, videos with graphic sexual content, homophobia, racism, violence or content that might incite crime. Participants referred to the way people can upload content often without restrictions or monitoring on these platforms. Related to this, they worried about people accidentally coming across content they would not want to watch or listen to, including content that was inappropriate for children, emphasising how they did not have clear expectations for what they might come across on these sites.

"[I use] YouTube restricted settings. . . [You can find] anything you want to watch, if it's appropriate or inappropriate." [Bridgend/Cardiff workshop, 54-85]

⁶ Ofcom regulates on-demand programme services when they are established in the UK. There are fewer standards for on-demand programme services than for linear TV services. For example, there are no rules covering offence, impartiality, accuracy, fairness and privacy.

⁷ From next year, Ofcom will take on new responsibilities for regulating video-sharing platforms which are established in the UK. These new rules will mean that platforms must have in place measures to protect young people from potentially harmful content and ensure that all users are protected from hate speech and illegal content. This is an interim role ahead of a new online harms regulatory regime. On 12 February 2020, in its initial consultation response to the Online Harms White Paper, the Government announced that it is minded to designate Ofcom as the new regulator for online harms.

3 Attitudes to the Broadcasting Code

Participants supported the rules in the Broadcasting Code

After the rules in the Broadcasting Code were described to participants, they felt they made sense in principle and covered the main concerns they had about TV and radio content. They welcomed the extent and nature of the rules in place. Some also recognised the impact of the rules on areas they had not previously thought about. For example, although concerns about crime, disorder, hatred and abuse were not top of mind for most participants, they thought it was very important to have rules in place to prevent this type of content being broadcast.

All the rules were regarded as important and there was little appetite for changing them. However, participants were able to differentiate between those they felt were more or less important for society. Figure 1 summarises the broad pattern of importance that emerged across the deliberations. Some of the rules tended to be grouped together by participants, and this is reflected in the diagram and the findings described below.

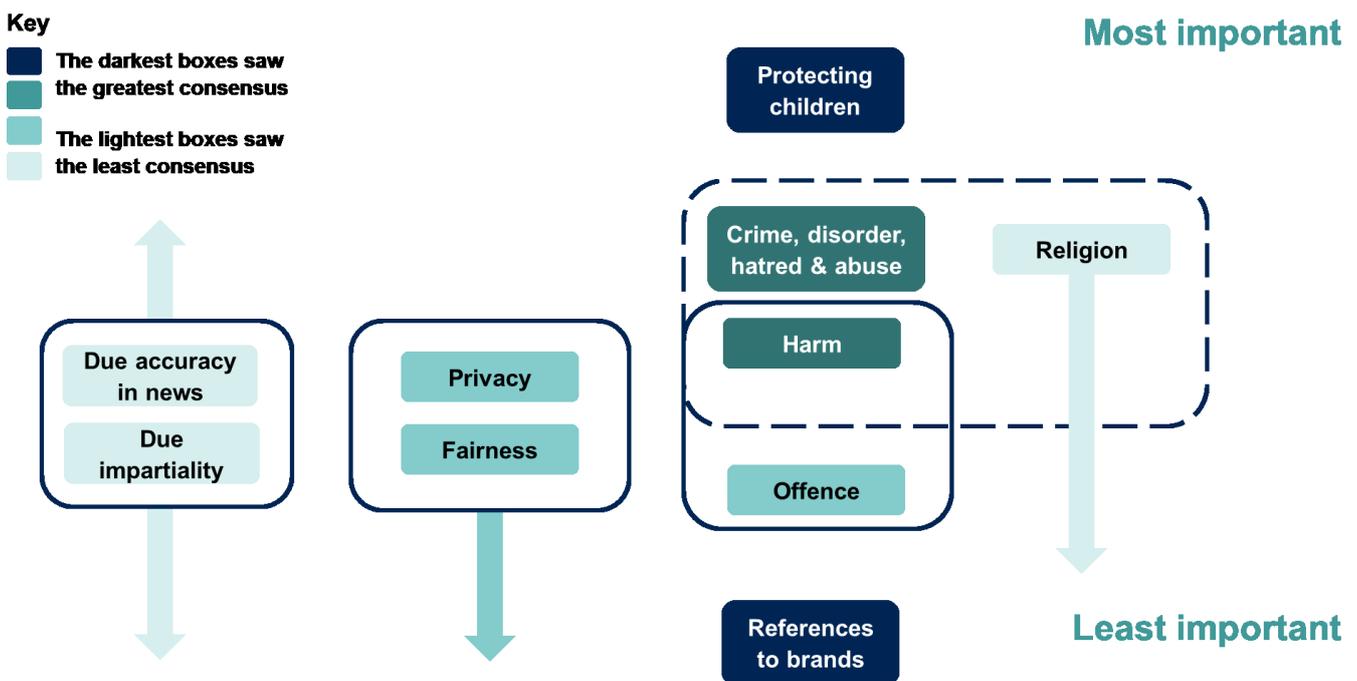


Figure 1: Views on the relative importance of the rules in the Broadcasting Code

Protecting children was a consistent and strong priority among all participants

There was widespread agreement that protecting children was the most important rule. Participants overwhelmingly agreed that ensuring children do not come across inappropriate content was essential.

"[I am not a parent but] protecting children for obvious reasons: they are the future, we have to protect them." [Manchester, transgender depth interview]

After further discussion, participants acknowledged that there could be a tension between protecting children and allowing adults the freedom to choose what they watch and listen to. There were a range of suggestions about how to reconcile this, including the use of verbal warnings, age-related profiles,

monitoring and PIN protection – steps many were already taking (as described in Chapter 2). However, participants' primary concern was that there should be some protection in place for children irrespective of whether parents were taking these steps. This meant they did not want to see the rules relaxed for TV and radio and some argued for stronger protection online.

"We can control what we watch. We don't know about kids. They tend to watch anything that comes up." [Solihull workshop, 18-36]

Discussions about offence focused on discriminatory content

Participants across locations and age groups widely agreed that societal norms have shifted in recent years. They noted how discriminatory behaviours and language were now more commonly perceived as unacceptable than was previously the case, regarding this as a commonly held view across society. For example, many participants reflected on how attitudes towards race and sexuality have changed, pointing out that TV programmes in previous decades included language, storylines and behaviours now perceived as discriminatory. These changes meant participants generally felt discriminatory content aimed at specific groups should be prioritised over concerns about other types of offensive content, described further in Chapter 5.

Although these societal changes were widely seen as being reflected on TV and radio, some participants in the LGB mini-groups felt that it was still common to see or hear homophobic content on TV and radio. They suggest this was not taken as seriously as other forms of offence such as racism and felt religious arguments were often used to justify this kind of discriminatory content.

In this way, participants were more concerned about offensive content that was regarded as discriminatory than about other types of offensive content like nudity or swearing, which was seen as having a less severe impact on adults.

"People go on about how 'they wouldn't get away with this a few years back'. But when you look back at some of the... harmless comedies. A lot of them they wouldn't be able to show now because they have the language, the racist issues in them."

[Bangor, disability depth interview]

Participants felt there were challenges around applying the rules for offensive content given its subjective nature and the importance of freedom of expression. They focused on people knowing what to expect so they can make informed choices. For example, having access to clear information about the content in programmes.

"You have to have freedom of expression, but also freedom for people to switch over if they don't want to watch it. You have to have it within the rules and regulations around harmful and offensive. Comedy in particular, that's the bread and butter. The flavour of people's comedy changes." [London workshop, 36-55]

Some participants felt that concerns about offence had gone too far

Some participants emphasised the importance of people not taking offensive content too seriously. They worried about rules that could prevent content from being broadcast and the impact this could have on freedom of expression. They wanted to ensure that programmes they and many others enjoyed

remained available to watch and listen to. This included both archival content as well as specific genres made today such as comedy shows.

"People find things more sensitive now. Back in the day things would have been a joke and funny, now they are offensive." [Newcastle workshop, 18-36]

Harm was widely considered more important than offence for society

Most participants felt that harmful content was a more serious issue than offensive content. They had concerns about the potential for people to be harmed by what they watch and listen to, describing how this kind of content can affect people's feelings and behaviours, as well as communities and wider society overall. This was seen as having a potentially greater impact on individuals and communities than offensive content which, although upsetting to some, was less likely to lead to negative actions or behaviours.

"Like it or not, people can be very impressionable, so somebody has to govern the whole process, or at least have some guidelines." [Solihull workshop, 54-85]

Participants often felt they would not personally be affected by harmful content

Despite their concerns about harm, participants often believed they were unlikely to be negatively influenced by a programme personally. This was linked to the impression they had not come across much content they considered potentially harmful. As with offensive content, there was general agreement that adults should be able to make their own decisions about what might be harmful to them.

"I think that one is quite wishy-washy, it's for adults. Most adults should be free to make their own informed decisions, there's not much sense to it. Are these things actually harmful? Probably not really." [Antrim workshop, 36-55]

Even so, participants recognised that some groups in society may be vulnerable to harm from audio-visual content for different reasons, including past negative experiences. In some cases, participants felt harmful content could have an impact on audiences without individuals being aware of this. They suggested this could have a more negative impact than offensive content which is easier to identify and therefore easy for adults to avoid if they do not want to watch it. For these participants, this made it more important to have rules protecting audiences from harm.

"I think some people don't even realise they've watched harmful content. They end up in situations and feel some way, and don't realise it's because of content they've seen." [Newcastle workshop, 18-36]

As discussions progressed throughout the sessions, reviewing the clips and scenarios brought the potential for harm to life for participants. They increasingly recognised that adults (and specifically vulnerable adults) could be affected by what they watch and listen to. This challenged their initial view that adults do not need to be protected from harm and should be responsible for deciding on the content they consume.

Concerns about content leading to harmful behaviours were often discussed when considering other rules

Participants frequently linked the idea of 'harm' to many of the other rules. They repeatedly justified the importance of having other rules in place through the need to avoid harm, which they defined in broad terms. For example, although rules about references to brands and products were not spontaneously seen as important, participants considered this as more serious when connected to financial harm. Likewise, the importance of due accuracy in news and due impartiality were regarded as more important by participants who felt there could be a potentially harmful impact on wider society without having these rules in place.

"I think the first bit [of the references to brands and products rule] is right 'to ensure people are protected from the risk of financial harm'. For product placement, I don't care."

[Bridgend/ Cardiff workshop, 54-85]

Participants often envisaged potential impacts that could result from a lack of rules or from content that breached the rules. This ranged from causing minor upset through to significant harm to individuals or wider society. Participants argued rules were more important where they felt there was a greater risk of harm to individuals or wider society. This is discussed further in relation to the remaining rules below.

Rules around crime, disorder, hatred and abuse were very important and linked to potential harm

Workshop participants were not concerned about crime, disorder, hatred and abuse at the outset of discussions. This was not something they had come across on TV or radio and they did not expect to in future. However, in considering what might happen without rules in place, participants often saw this as one of the most important issues for society. There were strong, widespread concerns that rules should be in place to prevent TV and radio being used to spread views that might encourage crime or hatred and the potential harm this could cause. This was linked to worries about giving credibility to extremist ideologies of different kinds. Participants recognised that this sort of content is available online if people want to find it. However, the potential for widespread harm from similar content being broadcast on TV and radio meant this was a strong concern. Participants from minority ethnic backgrounds at some of the mini-groups also expressed concerns about divisive comments causing harm to community cohesion by potentially driving communities apart.

"People could die as a result of the consequences of this one, such as terrorism."

[Antrim workshop, 36-55]

Rules about religion divided opinions

Religion was generally thought of as a sensitive topic and participants often had strong and opposing views about regulating religious content on TV and radio. Many participants said they had little interest in religious content, including some who would prefer if it was not broadcast. However, broadcasting religious content was important to those who saw this as protecting freedom of expression and representing different views.

“Everyone’s religion has to be respected. I’m not religious at all, so I try not to get involved in anyone’s religion, so maybe I’m a bit more blind-sighted. But everyone’s religion needs to be protected. It might incite more violence if more of it is shown.”

[Newcastle workshop, 18-36]

Participants’ experiences of the application of the rules related to religion also varied. On the one hand, some felt the current rules were effective in protecting vulnerable groups by stopping programmes which might exploit people emotionally or financially, for example in requests for donations. However, those who disagreed with this felt the rules around religion were not always enforced, particularly on smaller channels.

Perceptions of the rules about religious content were often linked to participants’ views of other rules related to harm, offence, and crime, disorder, hatred and abuse and to discussions about freedom of expression. There were much stronger concerns if religious content was considered to support extremist ideologies or if programmes might exploit vulnerable people based on their beliefs. Participants from minority ethnic backgrounds at some of the mini-groups had concerns about religious programmes and channels that were regarded as potentially sectarian and exploiting divisions within communities. In some cases, this led participants to argue that no religious content should be broadcast on TV and radio.

Many participants were concerned about due impartiality and due accuracy in news

Participants grouped together the rules on due impartiality and due accuracy in news. There were differing views about news broadcast on TV and radio. Some considered TV and radio news as the most trustworthy available, even if they had specific concerns about the coverage of some issues. They wanted to maintain or strengthen impartiality and accuracy for broadcast news as a crucial way of addressing the problems they perceived with other news sources. These participants saw TV and radio as a key way of accessing reliable information, seeing this as more trustworthy than online sources.

“There’s a reasonably good chance that your opinion will be formed by the media, so I would say that [accuracy and impartiality] in this context are very, very important.”

[Newton Abbot, disability depth interview]

By contrast, participants who distrusted TV and radio news described disengaging from these programmes, instead sourcing their news in other ways. Many in this group wanted broadcast news to be impartial and accurate. However, they were not convinced this would happen, even with rules in place and consistently enforced. As such, some saw these rules as less important because they were not currently effective and felt they would not be in future.

“One person’s impartiality is another person’s bias. How can you judge it? Your view of a balanced debate is different from mine.” [Solihull workshop, 54-85]

Views varied about the importance of fairness and privacy

Participants tended to group together the rules on fairness and privacy. Attitudes about their relative importance differed based on participants’ expectations about the potential for harm to individuals. Some argued that people’s lives could be badly damaged if they were treated unfairly or their privacy was infringed on TV or radio. For them, this was an important issue and similar to other types of serious

harm. Other participants thought that fairness and privacy were important, but less so than some of the other rules. They struggled to see what the impact would be on ordinary people, making it less important than other types of potential harm.

“I think [privacy is] more important than what you would think it is. Like, I think if somebody was to maybe get into your phone and maybe see photos, or photos of their kids and that.” [Perth workshop, 18-36]

Rules about references to brands were seen as less serious but still important

Participants were less concerned about references to brands and products. This was almost always ranked as the least important rule during discussions. Participants acknowledged some potential for harm if people were misled by references to commercial products, with concerns expressed about vulnerable groups. However, initially they found it hard to envisage this happening in practice and thought it was unlikely they would personally be influenced by commercial references. During discussions about the hypothetical scenarios, participants reflected on the potential for harm from content featuring brands and products. This is described in Chapter 4 in relation to the *Online Video* and *TV Interview* scenarios. Participants also linked their views on commercial references to their experience of advertising on different media, arguing that seeing similar commercial references on TV and radio would make little difference.

“It should be a rule, but it’s not as important as the others. You can make your own choice.” [Antrim workshop, 36-55]

Even so, most participants still wanted rules around commercial references to be in place. They felt that otherwise TV and radio would become too like the internet, with extensive advertising, including challenges for consumers in working out when they were being sold to. There were also concerns about encouraging potentially harmful behaviours like gambling if rules were not in place.

Reviewing example clips and scenarios reinforced views on the importance of the rules

In general, participants’ initial views about the importance of the rules in the Broadcasting Code were reinforced as they viewed specific examples in the clips and scenarios throughout the day. Harm continued to be seen as more important than offence. Participants expressed particularly strong views towards the scenarios that related to crime, disorder, hatred and abuse, often regarding these examples as unacceptable irrespective of the circumstances.

“Unacceptable. There’s no justification. There’s no way you can go back and say, ‘Oh, I said this because of this.’” [Manchester, Black African mini-group]

4 What influences participants' views on whether broadcast content is acceptable?

Three themes influenced views on whether an example was seen as acceptable to broadcast or not

While attitudes differed depending on the example, three themes influenced views towards the acceptability of the clips and scenarios. Participants' starting point was usually that adults should be able to make their own decisions about whether to watch or listen to something and they did not want strict limits on what could be broadcast. They emphasised that the views of one person could differ from those of another, particularly in terms of offence, and they recognised how their own priorities varied throughout discussions.

Participants considered:

- **What was broadcast?** This included things like the specific words, images, tone, sounds and storyline.
- **Why was it broadcast?** This included participants' views on why they thought broadcasters, producers, presenters or contributors might have shared or presented things in the way they did.
- **How was it broadcast?** This included the type of programme (genre, style of show), timing, channel or station, reputation of the presenter or speaker, and whether there were any warnings.

Participants typically considered all three of these questions – often trading off characteristics they felt made the example more or less acceptable – before coming to a final view. A full description of attitudes towards all the clips and scenarios used in the research is available in the 'Clips & scenarios report'.

What was broadcast?

The specific nature of the content broadcast shaped acceptability

Participants often thought about acceptability by assessing the specific nature of what was being broadcast. This included:

- **The perceived strength of the content.** Participants considered whether the example included a range of different factors such as graphic or repeated nudity, strong sexual or violent content, or offensive or discriminatory language, and whether these factors affected the strength of the content. For example, some participants from a minority ethnic background were shown a clip from *Qutab online*⁸ with footage of a woman being shot broadcast on a loop. They felt that showing this kind of content repeatedly was unacceptable.
- **The tone.** Participants considered whether they thought the tone used in the example had the potential to be upsetting or was targeted at a specific individual or group. Tone was often

⁸ A current affairs programme examining societal issues in Pakistan. This edition of the programme included the repeated use of CCTV footage of a woman being fatally shot, which was shown on a continuous loop. The footage clearly showed the woman being shot, collapsing and gasping for breath.

discussed in relation to comedy programmes where participants distinguished between jokes they felt were genuinely designed to be funny and those which were seen as deliberately going “too far” to provoke a reaction. As such, they often linked the tone used in a clip to why they felt something was being broadcast.

A small number of participants felt that some of the examples were unacceptable in any context

Some of the examples included content that a small number of participants thought would be unacceptable in any circumstances. They felt it was important that specific types of content were never broadcast, even if it had an impact on the freedom of audiences to consume what they want. They were often particularly worried about the impact on specific groups such as children, people from a minority ethnic background or vulnerable people.

“There are loads of things in the world that people may like, but it doesn’t necessarily mean it should be on TV.” [Perth workshop, 18-36]

This was something a few participants emphasised in relation to a clip from an episode of *A Family at War*⁹ a historical drama which contained archive footage with racially offensive language, and a clip from the *Sex Business*¹⁰ documentary, which contained graphic footage of sexual acts. Both clips divided opinion, with some arguing the content itself was inappropriate to show in any situation, while others suggested the clips could be shown in the right circumstances. For example, a strong warning and a later broadcast time would make the *Sex Business* clip acceptable for many.

Some participants felt content that could incite hatred or encourage abuse and racism should not be broadcast, even in a documentary or other factual context. There was a strong reaction to the *Radio – hate speech*¹¹ scenario. This illustrated participants’ widely held views about the importance of having rules to prevent content that might incite hatred or violence from being broadcast. However, they recognised that similar content might be available online.

Why was it broadcast?

Why content was perceived to have been broadcast shaped views on acceptability

Participants reflected on why they thought content had been included in programmes. They recognised that in some cases it can be important to broadcast content that might be offensive or upsetting, for instance when trying to educate or raise awareness of certain issues. Participants related this to the importance of freedom of expression.

⁹ A drama film made in the 1970s about a family in World War II, featuring racist behaviour and racially offensive language, including “wog”.

¹⁰ Documentary about sex workers featuring graphic and extreme sexual content.

¹¹ One of the hypothetical scenarios used during fieldwork, in which a local radio station broadcast a discussion on the rise of social tensions in the local area at 10pm. This included a clip from a prominent right-wing commentator encouraging white residents to make minority ethnic residents “feel unsafe and unwelcome living in our area”.

“Putting that content [related to mental health] on TV can help hundreds of people realise what’s happening to them, they’re not on their own. So, I think having the rules in place is allowing broadcasters to still put it on TV or radio, but not in such a massive way that it’s harming people, but can help people, as well.” [Cardiff, LGB mini-group]

In this way, they made assumptions about the motivations of programme makers, presenters and broadcasters, bearing in mind the purpose of the programme and its genre and seeing these as important for deciding on acceptability. For example, participants debated the public interest in showing graphic footage in the *ITV News*¹² clip before the watershed. Reflecting on the clip, some participants were concerned about broadcasters showing offensive or harmful content deliberately in order to increase their ratings and questioned why the footage had been shown. However, arguments were also made about the importance of reflecting real-life events accurately and telling a significant news story.

“If they don’t show such news then how will people know about such cruelty and injustice? I think people need to see the full thing for it to have an impact.”

[Birmingham, Bangladeshi (Bengali) mini-group]

Mistakes during live broadcasts were seen as acceptable if they were genuine and not easily avoidable

Participants recognised that mistakes like accidental swearing can happen during live broadcasts. They felt there was little need for action by the regulator in some of these circumstances. For example, they suggested action was unnecessary if a presenter or broadcaster had not meant to use inappropriate language, as in the *Ian King Live*¹³ clip, expecting the presenter to apologise in response, or where a public contributor unexpectedly says something potentially offensive in a way that could not be controlled. This kind of situation was seen as more common on radio phone-ins where a presenter may not know what a contributor is going to say.

“It was a complete mistake and he apologised, so there’s no issue.”

[Antrim workshop, 36-55]

Some participants had concerns about the professionalism of presenters who accidentally use offensive language. Even so, they felt this could often be dealt with internally by broadcasters, including by the presenter apologising later in the programme. Participants argued again that context was relevant – for example it might be much less acceptable if a presenter frequently used this type of language or did so on a channel or station that children were likely to watch or hear.

The perceived motivation behind pre-recorded programmes was an important consideration

Participants distinguished live broadcasts from situations where a programme was pre-recorded and still shown despite including potentially offensive or harmful content. In these cases, participants questioned the motivations of broadcasters and programme-makers. They emphasised how broadcasters have a

¹² ITV News report on the day of Lee Rigby’s murder in South East London, featuring distressing images of the murderer holding a bloodstained weapon, talking to camera and an indistinct image of the victim’s dead body (and, later, the bodies of the perpetrators) in the background.

¹³ News report where the presenter says “fuck” (believing his microphone is switched off) in response to a technical error. The accidental offensive language is followed by a brief explanation of the technical error and an apology.

responsibility to protect audiences and ensure this kind of material is only aired in an appropriate way. This was closely related to participants' desire to protect audiences from potentially harmful content.

“They intentionally played the clip [in the Radio - hate crime scenario], but they could have chosen any other clip to make the point. . . They knew what the person said and chose to broadcast it.” [Newcastle workshop, 18-36]

Similarly, some participants distinguished between comments made on a voiceover to a programme and those made by programme contributors. They felt that offensive comments in a voiceover were less acceptable as a choice had been made to include them in a script by the programme producers.

Participants emphasised the importance of people being able to share their experiences, provided these were genuine

There was significant support for sharing personal experiences through TV and radio, even where this could be potentially offensive or harmful. However, participants wanted to ensure that these experiences were genuine and audiences were not being misled, for example if a guest was not transparent about a financial interest as in the *TV interview* scenario¹⁴. They emphasised the importance of broadcasters being clear about the reasons for showing different types of content, such as when they believe something is in the public interest or has an educational purpose. This was also tied to the importance of having different views and sufficient context in a programme. For example, participants reiterated the need to provide different perspectives including expert advice if someone was sharing their experiences about sensitive subjects such as health.

How was it broadcast?

Participants emphasised the importance of setting clear expectations

The way in which content was broadcast played an important role in how participants viewed acceptability. A key focus was whether audiences might accidentally come across content they would not want to watch or listen to. Participants described four broad factors that they felt could help to inform audiences about what to expect. If these were in place, they argued audiences would be able to make an informed decision about whether to watch or listen to something. Where these factors were absent or went against expectations, participants considered the example less acceptable.

1) The timing of a broadcast was important, with participants often relying on the watershed

Participants felt that content broadcast later in the evening could be more extreme or offensive, as audiences would know that it was more likely to include this type of content. This reflected their awareness of and support for the watershed, discussed in Chapter 2. Many described a gradient so that later programmes on both TV and radio could be more graphic than those shown at 9pm.

For example, some participants felt that the clip of *ITV News* shown at 6.40pm was too graphic to show before 9pm, since families could be watching the news together and see the footage unexpectedly.

¹⁴ A hypothetical scenario used during fieldwork about a popular morning TV show which aired a celebrity interview in which the interviewee mentions that he has started giving his children a specific brand of dairy-free milk. He explains that it has helped stop his children's stomach problems and he thinks it tastes better than other milk substitutes. He mentions the specific brand seven times and explains it is available in most supermarkets. This is not challenged by the presenter.

Concerns were also expressed about the footage being broadcast shortly after the events had taken place, with some participants believing this could fuel further violence or racism at a time of heightened tensions. They suggested this could incite hatred or perpetuate negative stereotypes.

“It [ITV News clip] is pushing the narrative of the black man running around stabbing each other with machetes.” [Manchester, Black African mini-group]

Likewise, the clip of sexual violence in *Emmerdale*¹⁵ shown just before 7.30pm divided opinion, with different views about whether it was broadcast too early in the evening. By contrast, some participants felt the clip from *LBC radio*¹⁶ was more acceptable because it was broadcast at 4am when audiences were less likely to come across it by accident.

“I don’t feel like that [Emmerdale clip] is appropriate for 7pm. It wasn’t like you saw the rape happening, but you saw the start of it, it was still quite violent. The guy was quite aggressive in the way he grabbed her. . . For that time of night, little kids could be watching that.” [Dundee, paired young person depth interview]

2) The reputation of presenters, channels/stations and individual programmes shaped expectations – as did genre

Some presenters, programmes or channels/stations had a reputation for including stronger content. Participants felt the fact that audiences were likely to expect this made a difference to acceptability. They argued audiences used these expectations to avoid content they did not want to watch or listen to.

“One imagines that the people that listen to a programme [LBC radio clip] by someone like that know the content he will be spouting, and he is obviously a shock jock, he’s saying what he thinks he will get away with.” [Bridgend/ Cardiff workshop, 54-85]

Some mini-group participants from a minority ethnic background also described having different expectations for Asian channels and stations compared to mainstream UK channels and stations. They believed that Asian channels and stations may not have the same regulations even if they were being broadcast in the UK. This shaped what these participants expected to see and hear. Likewise, some participants from a minority ethnic background avoided watching mainstream TV programmes as they felt they were more likely to include unsuitable content such as sexual or violent scenes.

“There is a body set up to control all channels in UK. In Asian channels there are more dramas and music so less scope for regulations.” [Leicester, Indian (Punjabi) mini-group]

Similarly, participants thought the genre of a programme helped set expectations. They described how they might be prepared to see or hear potentially offensive language or swearing in a comedy show that they would not necessarily expect to encounter in a documentary or drama. Another example discussed by participants was using racially offensive language in a drama or documentary which was reflecting or

¹⁵ A soap episode featuring a storyline about the rape of a long-standing female character. In the clip, the female character is seen continually asking the male character to leave her home before he grabs her and forces her onto the bed (the scene ends here).

¹⁶ Radio talk show where the presenter discusses a news report about a blind man who intends to use a guide horse rather than a guide dog. The presenter makes negative and disparaging remarks about the blind man.

commenting on a specific period of history. If the same language was used as part of a drama set today or in another context, such as on the news or on a talk radio show, it might not be as acceptable.

“I think it’s context, isn’t it? I like comedy, and I listen to, like, stand-up comedians, and the content is outrageous. Their content is outrageous. However, I know when I’m signing up to that, I’m expecting to probably be offended a little bit, laugh along at something that’s probably offending him over there a little bit, because that’s the context of what it is.”

[Manchester, Black African mini-group]

3) Whether different views were included, particularly for controversial themes

Participants emphasised the importance of programmes sharing different perspectives on a theme. This might be through having a range of guests on a panel show, providing additional information and context about a subject, presenters offering a challenge to specific viewpoints, or having different perspectives reflected in drama storylines and documentaries.

“I think it’s important to show everyone’s views and show some are for and some are against.” [Glasgow, Jewish mini-group]

This was seen as particularly important for contested topics where there might be strong differing views. Participants felt examples of potentially problematic content were less acceptable where this diversity was not included, irrespective of other characteristics of the programme. It was largely seen as the responsibility of programme makers to ensure different views were included, but participants also felt presenters had a specific responsibility to provide context by offering appropriate challenge to guests.

4) Participants wanted audiences to have sufficient information to make decisions

The **title** and **description** of programmes were regarded as key ways for audiences to decide whether a programme might be suitable for them. For example, the title of one clip *“OMG: Painted, Pierced and Proud”*¹⁷ was seen by some as not accurately reflecting the fact the programme contained re-enacted and recorded footage of someone amputating their finger.

“I don’t think the title [OMG: Painted, Pierced and Proud] gives much away. I wouldn’t think that I would see an amputation.” [Newcastle workshop, 36-55]

Warnings were also seen as important for making potentially offensive or harmful content more acceptable by informing the audience of what to expect. Participants wanted clear and accurate warnings at the start of programmes and at the end of the advert breaks before particular sections, where necessary, so that audiences were not taken by surprise. Participants also took into account other factors when deciding whether a warning was necessary. For example, whether programmes were broadcast after the watershed or in a particular genre might mean that warnings were not always necessary as audiences were seen as likely to already know what to expect.

“As long as they warn you, which I think they often do, then the choice is yours whether you watch it or not.” [Newton Abbot, disability depth interview]

¹⁷ Documentary about extreme body modification, including interviews with a contributor who had deliberately amputated her finger as a form of ‘body art’. Footage is shown of the amputation with some blurring.

Summary of attitudes towards the clips and hypothetical scenarios

The tables below summarise attitudes towards the clips and hypothetical programme scenarios shown in the workshops. The hypothetical scenarios were developed to support discussions, although many were based on themes from real programmes that were broadcast on TV or radio or available online. A full description of participants' views towards each of the clips and scenarios involved in the complete research project (including the mini-groups and depth interviews) can be found in the 'Clips & scenarios report'.

Table 1: Summary of attitudes towards the workshop clips

Name and description	What was broadcast?	How was it broadcast?	Why was it broadcast?
<p>Ian King Live, Sky News, 30th July 2015, 18:47 - accidental swearing</p> <p>News report where the presenter says "fuck" (believing his microphone is switched off) in response to a technical error. The accidental offensive language is followed by a brief explanation of the technical error and an apology.</p>	<p>Considered offensive language that should not be used pre-watershed, but this was not seen as particularly serious.</p>	<p>The presenter's reaction and apology made it less serious. Shown on a news channel which children are unlikely to be watching. But professionalism was a concern for some.</p>	<p>Seen as a clear mistake.</p>
<p>Steve Allen, LBC, 1st October 2018, 04:00 - guide horse story</p> <p>Radio talk show where the presenter discusses a news report about a blind man who intends to use a guide horse rather than a guide dog. The presenter makes negative and disparaging remarks about the blind man.</p>	<p>Considered initially funny due to the tone of the presenter (who described the story as "stupid" and "ludicrous"), but increasingly offensive as it went on (lasting one minute). Continuation of the commentary meant some participants felt it was targeting and belittling a blind person in an</p>	<p>Seen as more acceptable to some participants due to:</p> <ul style="list-style-type: none"> ▪ Humour ▪ Reputation of the presenter / programme ▪ Timing of the broadcast (4am) – fewer people likely to be listening 	<p>Many considered the tone too derogatory – setting out to offend.</p>

	offensive way. Sense that societal views have changed towards disability and this style of humour is no longer acceptable. This was particularly an issue for disabled participants, who overall felt the content was unacceptable.		<i>“How are you going to take it [the guide horse] on the tube’ - if that was the end, it would have been fine. It’s the attitude, tone of his voice, making fun, taking the mick, and I thought that was so wrong.”</i> [Bangor, disabled depth interview]
Family at War, Talking Pictures TV, 19th November 2017, 20:15 - racial offence	Strong racist language no longer acceptable – in any context for some. Concerns about children picking up language without understanding the meaning.	Debate about portraying history, even on a specialist channel. Although being a niche channel means audiences are less likely to come across it unexpectedly. General agreement there should be a warning to prepare audiences and make it clear that this sort of language is not acceptable today.	Recognition that the programme was made in a different era but questions about why it would be broadcast now. Seen by some as having an educational purpose and reflecting real-life at that time.
A drama film made in the 1970s about a family in World War II, featuring racist behaviour and racially offensive language, including “wog”.	<i>“It’s not ok. We should be trying to get away from those sorts of attitudes. It was needlessly shown.”</i> [Antrim workshop, 36-55]		
Emmerdale, ITV, 8th May 2019, 19:25 - rape storyline	Seen as uncomfortable and upsetting to watch by both workshop participants and young people who participated in interviews. Violent (although not graphic) scene regarded as potentially too extreme but wider storyline and follow-up made it	Some felt it was too graphic for the time (just before 7.30pm), with concerns about children watching or not expecting this kind of content. A few participants also worried about audiences replicating this kind of violent behaviour. But participants felt that regular viewers were likely to know what is	Important to address social issues – but some worries about chasing ratings. <i>“If it followed a theme and it highlighted domestic abuse, I can understand it. If it was just gratuitous, then no.”</i> [Solihull workshop, 54-85]
A soap episode featuring a storyline about the rape of a long-standing female character. In the clip, the female character is seen continually asking the male character to leave her home before he grabs her and			

forces her onto the bed (the scene ends here).	more acceptable for regular viewers.	going to be shown and the warnings provided were seen as making it more acceptable.	
ITV News, ITV, 22nd May 2013, 18:37 - Lee Rigby murder	Upsetting, graphic content showing dead bodies in the street (without any detail) and other imagery which was not blurred out.	Concern about timing pre-watershed and worries about children watching this unexpectedly on the news. But warning seen as strong, clear and effective. Concerns were also expressed about the footage being broadcast shortly after the events had taken place, with some mini-group participants believing this could fuel further violence at a time of heightened tensions.	Cynicism about not considering the impact of being the first channel to show the footage, but also recognition of the public interest. Clear divide between those that found the graphic nature of the clip unacceptable and those that felt it was important for the news to accurately portray events in a detailed way. Some participants from a minority ethnic background felt the footage would not have been presented in the same way if the perpetrator had been white and the victim black.
News report on the day of Lee Rigby's murder in South East London, featuring distressing images of the murderer holding a bloodstained weapon, talking to camera and an indistinct image of the victim's dead body (and, later, the bodies of the perpetrators) lying some distance away in the background.	Strong worries about the impact on the family of Lee Rigby at the time and spreading hatred by giving the perpetrator a platform.		
OMG: Painted, Pierced and Proud, Channel 5, 2nd July 2017, 22:00 - finger amputation	Will appeal to some, due to the varied interests people have but was considered too graphic for others who did not think this should be broadcast on TV.	Timing (10pm) and warning increased acceptability. But title should link better to the content and some queries about it being available on-demand. Nature of the programme as a documentary with some blurring of graphic content	Some concerns this was being broadcast for ratings and could be exploitative for the contributor involved.
Documentary about extreme body modification, including interviews with a contributor who had deliberately amputated her finger as a form of 'body	Concerns about harm to vulnerable people, especially given the light-hearted, positive tone.		

<p>art'. Footage is shown of the amputation with some blurring.</p>		<p>also seen to make it more acceptable. However, some calls for including commentary from a medical professional or challenging the contributor's perspective.</p>	
<p>The Sex Business: Pain for Pleasure, Channel 5, various dates, 22:00 -graphic sexual content</p>	<p>Participants acknowledged the different interests people have and felt it would appeal to some – but considered very graphic for broadcast TV.</p>	<p>Title and warning helpful and expectation for this type of content on this channel. Some argued that later scheduling (11pm) would protect children and make the programme more acceptable for broadcast on TV.</p>	<p>Documentary that includes real stories suggests some educational purpose.</p>
<p>Documentary about sex workers featuring graphic and extreme sexual content, including:</p> <ul style="list-style-type: none"> • blurred shots of male clients having their genitals restrained, stapled, kicked, slapped and nailed to a board by sex workers; • angled (so masked) shots of a male sex worker putting his fingers into a woman's vagina; and • unmasked shots of female sex workers caning and whipping male clients' hands and buttocks. 	<p><i>"It's porn. It's literally porn. Like, I can't believe they would show porn on TV at 10 o'clock. I can't understand how that was ever allowed to be broadcast."</i> [Birmingham, LGB mini-group]</p>		

Table 2: Summary of attitudes towards the hypothetical workshop scenarios

<i>Name and description</i>	<i>What was broadcast?</i>	<i>How was it broadcast?</i>	<i>Why was it broadcast?</i>
<p>Radio – hate speech A local radio station broadcast a discussion on the rise of social tensions in the local area at 10pm. This included a clip from a prominent right-wing commentator encouraging white residents to make minority ethnic residents “feel unsafe and unwelcome living in our area”.</p>	<p>Widely seen as unacceptable because it was encouraging racism and inciting violence. Some mini-group participants suggested these kinds of comments had the potential to put pressure on community cohesion, resulting in fear and anxiety among some communities. Disagreement about whether the clip could ever be played due to the content – often tied to the reasons for playing it.</p>	<p>A warning would make it more acceptable for some. Panel shows and documentaries seen as the best format for this type of discussion.</p> <p>Emphasis on the importance of having a range of views / well-moderated discussion.</p>	<p>Unclear why/how this kind of content would be broadcast. Concerns about the broadcaster wanting to encourage views/ incite hatred.</p>
<p>TV political interview – misleading content A week before a general election, a political discussion show on a major TV channel features an interview with a well-known government politician. The politician is discussing reasons why the public should vote for his party. During the interview, the politician states the government has cut immigration by more than 20%. The presenter strongly challenges</p>	<p>Recognition of potential impact on election and failure to correct (by presenter/ politician). General scepticism about politics and sense that this sort of thing happens all the time.</p> <p>Some suggestion this was not as serious as some of the other topics because participants struggled to see the specific harm caused. But accuracy still seen as important.</p>	<p>Understanding that mistakes happen but there needs to be a correction later in the programme or afterwards e.g. apology at the end of the programme/ next episode.</p>	<p>Seen as a mistake, but not one that should be made – seen as the programme makers’ responsibility. Some concern about the motivations of the presenter e.g. these could be political.</p>

<p>this and states there is no evidence immigration levels have dropped. In fact, official documents publicly available before the interview confirm the politician was correct. However, the politician continues the discussion without correcting the interviewer, nor does the interviewer correct his mistake.</p>			
<p>Online video – commercial references</p> <p>A famous reality star uploads a video to a video-sharing site discussing her new book that describes a diet plan. She claims the plan is more effective than anti-depressants and chemotherapy and she urges anyone with ongoing medical problems to “give it a go”. No scientific evidence is given in the video. The video ends with her saying the diet plan is available for £50 a month and explaining how to sign up.</p> <p><i>Some participants were also played a related real-life radio clip of a presenter talking about people’s experiences of fighting and “curing” cancer by changing their diet, including her own.</i></p>	<p>There was strong concern about the potential for harm from this type of online content that was shared across participants. Worries that the video could encourage vulnerable people to stop medical treatment. Seen as unacceptable, irrespective of the wider circumstances.</p>	<p>This kind of content was expected online – but participants felt there should be stricter rules across platforms, even where numbers accessing are small. Emphasis placed on providing a disclaimer, e.g. always talk to your doctor, or wider medical advice from a professional/ linking to other sources.</p>	<p>The potential for making money from vulnerable young people exacerbated concerns but widely seen as always unacceptable due to the encouragement of harm.</p> <p><i>Views on the real-life radio clip differed. The link to cancer made it worse for some, while the right to share personal/ genuine stories (without a financial incentive) was also highlighted.</i></p>

<p>TV interview – commercial references</p> <p>A popular morning TV show includes a celebrity interview in which the interviewee mentions that he has started giving his children a specific brand of dairy-free milk. He explains that it has helped stop his children’s stomach problems and he thinks it tastes better than other milk substitutes. He mentions the specific brand seven times and explains it is available in most supermarkets. This is not challenged by the presenter.</p>	<p>Not overly concerned in comparison to other examples. No problem sharing personal experiences, interesting to hear about other people’s stories and could help some. But suggestions that the presenter should have challenged the guest or highlighted that other products were available.</p>	<p>Less of a concern than other scenarios – appropriate format and timing.</p> <p><i>“I said it was okay. It [my score] would go lower if he were being sponsored by the brand.”</i> [Solihull workshop, 18-36]</p>	<p>Regarded as much less acceptable if the guest is not transparent about any financial interest and some scepticism about their motivations from the start. Some concern about the influence of celebrities and the way it could mislead audiences.</p>
<p>Asian language TV channel – harm and offence</p> <p>An Urdu-language lifestyle magazine programme hosts a make-up contest. One contestant is given light-coloured make-up to apply and a second contestant is given dark make-up. The contestant with the light-coloured make-up is judged to have been made to look “more beautiful” because “complexion should be fair” and “people are not very keen on brown skin tone”.</p>	<p>Less familiar and not a concern for all – limited understanding of the culture and experiences of the Asian community and uncertainty about whether rules applied to programmes produced abroad and broadcast in Urdu. But considered racist and harmful by those more familiar.</p> <p><i>Participants at the Pakistani and Indian mini-groups were shown a clip of a real-life similar TV</i></p>	<p>Questions about showing this on TV in the UK if it goes against the expectations of wider society. Calls for a warning about the related issue of the safety of skin whitening products as a minimum. But also questions about whether non-Urdu speaking audiences would watch the channel and the extent of the impact.</p>	<p>Difficult to gauge the motivation due to unfamiliarity with community expectations. This made judging acceptability harder for some participants. Concerns about intentionally perpetrating harmful cultural norms for others.</p>

	<p><i>programme.¹⁸ Attitudes towards this were mixed. Some saw the programme as light-hearted entertainment while others felt it was not acceptable and reinforced negative stereotypes. The clip used the word "negro" to describe the darker shade of make-up, something younger participants often found offensive.</i></p>		
<p>TV Talk Show – harm and offence</p> <p>A TV talk show includes a panel discussion about introducing classes in schools about LGBT relationships for children. Guests discuss the topic and give different perspectives (e.g. gay father, Christian mother, LGBT charity, Muslim father). The religious guests voice their personal beliefs on homosexuality, saying gay sex is a sin. Other guests express the view that not teaching children about different relationships encourages homophobia.</p>	<p>Potentially offensive views shared, but balanced discussion therefore few concerns among participants. Divided opinion over the role of the presenter: some felt they should intervene and challenge views, others thought they should remain neutral as long as the debate was balanced.</p> <p><i>"Each side seemed to have a say, so it's acceptable."</i> [Antrim workshop, 36-55]</p>	<p>Discussing this on morning/breakfast TV seen as acceptable, but mixed views about warnings and challenge from presenters. Some agreement that a preview of the discussion would be helpful to give audiences a choice.</p>	<p>Assumed to be reflecting societal debate which was seen as important and acceptable.</p> <p>Having a range of views could also help to educate.</p>

¹⁸ A full description of the clip (Jago Pakistan Jago) and a summary of attitudes towards it is available in the 'Clips & Scenarios' report.

5 What does this mean for content standards?

Participants generally felt that discriminatory content aimed at specific groups should be prioritised over concerns about other types of offensive content

Participants were not surprised that the pattern of complaints about offensive content had shifted from being dominated by concerns about issues like nudity and swearing to discrimination. It was generally felt that this reflected a change in how these issues were viewed by society, as described in Chapter 3. Participants felt that Ofcom should prioritise content that was offensive about or encouraged discrimination against specific groups, particularly if it risked harming vulnerable people. They expected Ofcom's priorities should reflect changes in society, prioritising the topics people most care about.

However, participants felt it remained important to have standards related to other types of offensive or inappropriate content as a way of protecting children and avoiding potentially offensive content from being shown without justification. Participants considered the purpose of programmes as important in this, discussing the format of the programme, how often offensive content was shown or heard and the timing and intended audience.

"It's still relevant. I mean, when you're watching Coronation Street and everybody's effing and jeffing, that would be inappropriate because it's before the watershed. So, you know, if somebody dropped the C-bomb in the middle of Corrie, you know, I think people would complain at that." [Birmingham, LGB mini-group]

There was widespread support for Ofcom to prioritise cases of incitement and harm, even if these were on smaller or non-mainstream channels and stations aimed at specific communities

Participants were surprised that the first breach of the rules for TV or radio content inciting crime and disorder was recorded in 2012, rather than earlier. The consequences of calls to incite hate crime were generally seen as more serious than other breaches of the Broadcasting Code, reflecting the relative importance of this as described in Chapter 3. A common view was that, despite smaller channels and stations reaching fewer people, the impact of breaches of incitement could cause harm to greater numbers and therefore should be prioritised.

"I'd rather 6 million people heard an accidental swear word than 10,000 people hearing a sermon preaching hatred." [Newcastle workshop, 18-36]

Participants acknowledged that Ofcom was less likely to receive complaints about content broadcast on smaller or non-mainstream channels, even if the content was more extreme. Larger channels were seen as more likely to self-regulate due to the higher likelihood of public scrutiny. One solution suggested by some participants was to proactively monitor smaller channels, while dealing with complaints about larger channels in a more reactive way. However, there were concerns that it was more difficult to regulate these smaller channels and stations if programmes were not broadcast in English.

What should happen to standards?

There was some acceptance by participants that different rules could apply to different platforms

Attitudes towards different platforms were influenced by the extent to which participants felt in control of their viewing and listening. Participants felt they actively chose to watch content on catch-up and streaming services, as opposed to broadcast TV and radio. A desire for comparatively stronger standards on TV and radio stemmed from the increased likelihood of viewers and listeners coming across content by accident. This reflected participants' widespread support for the rules in the Broadcasting Code and their wish for these rules to be maintained, while being adapted to reflect changing societal norms.

“There’s tools in place to restrict the content of streaming services, so I don’t want my kids to see this, this and that. I can block it off, and they can’t see it, whereas on TV I can’t. So, I can kind of agree with the regulations that are in place, and I don’t think that on-demand should have more.” [Perth workshop, 18-36]

There was some surprise that catch-up services had fewer regulations than the equivalent TV broadcast by the same channel. Platforms connected to traditional channels, such as ITV Hub and BBC iPlayer, were also assumed to be easier to regulate than subscription services, such as Netflix and Amazon Prime, that were not linked to a British broadcaster. This was because participants felt platforms connected to traditional channels would have the infrastructure in place to comply with the rules and would already be ensuring programmes broadcast on TV and radio met these standards as described in Chapter 2. However, participants found it hard to distinguish in detail between services that in practice they accessed in similar ways.

“With [ITV Hub], I would think that would be easy as it is already part of ITV. With Netflix, [I] can imagine it being harder.” [London workshop, 54-85]

Some participants thought it was easier to protect children on catch-up or streaming services. This was influenced by the feeling of control many felt when accessing these services and by the presence of protections such as PIN codes, parental locks and age-related profiles. Participants also expressed the view that they had more personal control over the content they watched or listened to on these services because they chose to watch it and so had a better idea of what to expect from the content. In this way, there was some support for continuing to have stricter rules in place for TV and radio compared to subscription and catch-up services.

These platforms were also seen as having a greater ability to prevent access to harmful or offensive content because providers actively decide what to include on their platforms. They contrasted this with broadcast TV and radio where participants recognised that it is not always possible to control what is shown or heard.

“They do have more control of on-demand services. If something happens on live TV it can’t be fixed but it can be taken down from on-demand TV.”

[Belfast, paired young person depth interview]

While participants accepted some differences in standards, many felt that there should be more rules for online content than there are now, particularly for video-sharing sites.¹⁹ However, participants recognised this might be difficult to do given the amount of content available online and they felt this was a significant challenge for regulators.

“I won’t say I have become more accepting, but the fact is that we don’t have a choice because of the wide variety of platforms, channels and the type of programmes being shown. There is only so much you can do.” [Leicester, Punjabi mini-group]

Participants argued that broadcasters should have a duty of care towards those taking part in programmes, especially reality TV

Participants did not have many ideas for additional rules for TV and radio, beyond those included in the Broadcasting Code. One spontaneous suggestion, mentioned a number of times, was for broadcasters to be made accountable for the welfare of those taking part in programmes and not just the potential harm or offence to viewers and listeners.

Protecting programme contributors’ welfare was not seen as covered by the current standards and participants worried about the harm that could result from those featured in programmes without adequate support. For example, they expressed concerns about those involved in reality TV shows, referring to recent media coverage about what had happened to individuals after participating in a programme. Workshop participants also expressed concerns about a contributor who amputated her finger in the *OMG Painted Pierced and Proud* documentary. They worried about her wellbeing and suggested that she may have been exploited for ratings. There was particular concern about the potential exploitation of vulnerable or young people and calls for greater follow-up support after a programme has ended.

“The people that run reality TV are abusing people and taking advantage. They promise fame and money to people on the show. They had that big thing about the mental welfare of these people with the spate of suicides. There needs to be more protection.”

[Newcastle workshop, 36-55]

¹⁹ As noted above, the Government intends to introduce new UK regulation for online harmful content and has said that it is minded to appoint Ofcom as the future regulator. From next year Ofcom will also take on new duties ensuring that video-sharing platforms established in the UK protect their users from certain types of harmful content.

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