

# **Broadcasting Standards in the United Kingdom**

*A Response by the Maranatha Community  
to the Office of Communications'  
Consultation on the proposed Ofcom broadcasting code*

*October 2004*

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# **1. INTRODUCTION**

## **THIS DOCUMENT**

This document has been prepared by the Maranatha Community in response to the Consultation on the proposed Ofcom Broadcasting Code presented by the Office of Communications in July 2004.

The Office of Communications  
Content and Standards Department  
Riverside House, 2A Southwark Bridge Road, London SE1 9HA.  
Tel: 0207 981 3868 Fax: 0207 981 3806  
Email: [BroadcastingCode@ofcom.org.uk](mailto:BroadcastingCode@ofcom.org.uk)  
[www.ofcom.org.uk](http://www.ofcom.org.uk)  
Contact: Sara Winter.

## **THE MARANATHA COMMUNITY**

The Maranatha Community is a Christian movement with many thousands of members throughout the country active in all the main churches. Its membership includes a substantial number of people involved in the caring professions and in a very wide range of voluntary work. Since its formation 24 years ago, many of its members have been deeply involved in work amongst children and young people, people with drug and alcohol problems, the homeless and the disadvantaged. The Community has taken the initiative in a broad range of direct-aid projects contributing to the welfare of the nation and it also has extensive international experience. The Trust is a registered charity, number 327627.

The Maranatha Community  
102 Irlam Road, Flixton, Manchester M41 6JT  
Tel: 0161 748 4858 Fax: 0161 747 9192  
Email: [office@maranathacommunity.freemove.co.uk](mailto:office@maranathacommunity.freemove.co.uk)  
[www.maranathacommunity.org.uk](http://www.maranathacommunity.org.uk)  
Community Leader: Dennis Wrigley

## **THE CONSULTATION**

The Maranatha Community welcomes the opportunity of expressing opinion on the draft code and would wish to be involved in any further consultations and discussions on this subject. The following notes summarise our views and also our reactions to the proposals.

## **2. INITIAL COMMENTS**

Sections 1,2,3 of Consultation

### **2.1 Broadcasting : A formative influence**

Television and sound broadcasting have a pronounced and formative influence on behaviour, lifestyle and language in contemporary culture.

The broadcasting industry has the immense privilege of direct access to millions of homes. This privilege inevitably calls for the acceptance of public responsibility for what is transmitted. Programmes may enrich or impoverish the life of the nation.

Those who produce programmes and regulate them have an undeniable public responsibility to achieve a balance between defending the right of free expression of ideas and preventing real damage being done to the nation.

### **2.2 Public reaction to broadcasting standards**

Broadcasting is now a fundamental part of our culture and way of life and it is increasingly recognised that even with the fragmentation of the broadcasting industry immense power and influence is exercised by the few over the many.

Although facilities have long been provided for listeners and viewers to express their concerns about programmes, there is a very widespread feeling that the views of the public are not considered to be important. The majority of complaints about programmes are dismissed, often in a patronising or autocratic manner.

It is beyond dispute that there is growing and substantial public concern about the broadcasting of violence, sex and foul language. In spite of growing concern being expressed by the public over many years, the industry has in fact increased rather than decreased these elements in programming. The oft-repeated excuse that programmes can always be switched off does not adequately answer the views of the many who regard some programmes as intrinsically objectionable and intrusive. A public opinion poll arranged by Panorama has revealed that 54% believe that the BBC has “dumbed down” or lowered quality.

### **2.3 Restraints on broadcasting**

Because the broadcasting industry exercises immense power, abuse of which can have disastrous consequences for our culture, there must be some form of restraint. The exercise of unrestrained influence over mass communication is always dangerous, as totalitarian regimes have shown in the past hundred years. Propaganda and brainwashing techniques are readily available and it is easy for broadcasters to manipulate their audience. The industry must be ready for its worst excesses to be identified and corrected, and not just retrospectively through inadequate complaints procedures.

### 3. PUBLIC CONCERN ABOUT STANDARDS Sections 1,2 & 3

#### 3.1 Dissatisfaction

While the very high quality of many broadcast programmes must be acknowledged, general lowering of standards has been noticeable in the past decade.

A survey by the British Standards Commission and the Independent Television Commission published last year disclosed that more than half of the British public believe that standards of taste and decency on television are getting worse. Overall more than 40% of viewers said they had been offended by material screened during the past year. 56% of viewers also complained about the use of bad language in programmes. **Kim Howells**, the minister responsible for broadcasting, expressed alarm at the findings. He accused the television channels of screening “gratuitous” material which had a “corroding effect on the soul”. He said, “people are increasingly worried about the levels of violence on television”.

Many of those who are dissatisfied feel that their concerns are not taken seriously enough by producers and regulators and are now looking to Ofcom to take new initiatives.

#### 3.2 Criticism from within the industry

There is clearly unease within the industry about lowering standards and the need for action to halt this decline. The following comments must be taken very seriously.

- John Humphrys**, the television broadcaster and presenter of Radio Four’s ‘Today’ programmes, has pointed out that much of modern television is not only bad, but socially corrosive, coarsening and brutalising viewers through its obsession with sex, aggression and voyeurism. He said he had encountered *“real concern”* even within the industry about the effect of what he called the “mind numbing witless vulgarity” of so-called reality television. Referring to the battle for better standards he said *“It is a battle between people who are concerned about society and those whose overwhelming interest is simply to make programmes that make money”*.
- Roger Mossey**, the former head of BBC television news, pointed to Channel Four joining in “the trend towards pointless smut”. He quoted Channel Four advertising a show about four young men *“united by a burning desire to destroy the boundaries of taste and decency”* including drinking their own urine and nailing their genitals to a piece of wood. He warned of programmes which, while purporting to be about reality, in fact concentrated on *“sex, drinking and yobbishness”*. He said, “We are in the uncomfortable position that a nation with a dodgy record of hooliganism and loutish behaviour is bringing just that on to our TV screens”.

- **Bill Jordan**, one of BBC's longest serving Governors, spoke of the creeping tide of sleaze in broadcasting and warned that the public would turn against television if their legitimate concerns about sex and violence were not noted. He said, "There is a problem of almost incremental moves towards what is an unacceptable standard. One move makes the next one more acceptable and then there comes a time when you look back and ask where is it going to stop". He said, "I am concerned about what kind of society we are leading up to". He also said, "Swear words which were never used on TV ten years ago are now commonplace. It is flowing down to the 11 and 12 year olds who are using that language in the playgrounds".
- **Bruce Gynell**, former Managing Director of Yorkshire-Tyne Tees Television, said "I almost think it has become fashionable within certain sections of the television community to vie with each other to see who can come up with the most risqué programme". He referred to terrestrial television slavishly moving towards "a mire of sleaze". He questioned "What are we doing to our sensibilities and moral values and, more important those of our children, when day after day, we broadcast an unremitting diet of violence, extremes of sexuality and negative behaviour? We have gone too far down the road of so-called freedom and our terrestrial television is in danger of becoming a mire of salaciousness and violence". He warned "We have now reached the stage where so-called entertainment which once could only be found in Soho clip joints is paraded on television as if it were respectable. A medium which once celebrated all that was positive and good in our culture is beginning to denigrate all those values with monotonous regularity".
- **Andrew Neil**, a journalist and television commentator, has said, "There is a new coarseness about British television that sneers at standards and revels in slovenly speech and yob behaviour. It contributes to the brutalisation of a society in which headmasters are stabbed to death at school gates and old women are tortured and killed in their homes for the small change in their purse..."
- **Roy Hattersley**, a former Home Secretary and broadcaster, recently said, "Television has plunged so far down market, that week after week, I assume that we have reached the nadir. Then a programme plumbs ever greater depths. It seems that television can continue to degenerate indefinitely". He spoke of broadcasters "Whose only interest is making money out of human weakness. The principle among them is the sick enjoyment of other people's humiliation". He refers to a whole series of programmes "now devoted to the casual sex of young vulgarians". He concluded "One of the hard facts of television's decline – a painful fact to swallow for unapologetic libertarians – is that liberty, far from producing an improvement in quality, has produced a continual deterioration in standards".

SEE APPENDICES A, B & C

## 4. HARM AND OFFENCE : Children

Section 4 & 5 of Consultation

- 4.1 It is unquestionable that thousands of children in the United Kingdom today are being regularly exposed to corrupting ‘adult’ material on television.
- 4.2 The television industry clings tenaciously to the now totally discredited ‘watershed’ as being a sustainable means for protecting children from unsuitable television programmes. It is universally recognised that, for whatever reasons and by whatever means, huge numbers of children are now regularly watching extremely violent and corrupting pornographic television programmes.
- 4.3 It is ludicrous for the television industry to suggest that controlling or preventing corrupting viewing by children is the responsibility of parents, when in fact it is the children in dysfunctional families, where there is little parental control, who have most ready access to this material.
- 4.4 Furthermore, it has been established beyond any reasonable doubt that children, most of whom have television sets in their bedrooms, have ready access to late-night television.
- 4.5 At a time when thousands of children and young people are suffering the consequences of broken families, sexual abuse and promiscuity, and when they are bombarded on all sides by images of sex, it is utterly irresponsible for society to allow them to be exposed to material which can have a deep, lasting and corrupting influence upon their lives. It is difficult to avoid the conclusion that the television industry is rapidly moving towards placing the supposed rights of pornographers to produce degrading material above the authentic rights of children to be protected from pornography.
- 4.6 If the only way to protect our children from destructive influences is to stop the broadcasting of all salacious sexual material, all foul language, and all presentations of extreme violence, then that price is not too high to be paid in the interests of our children.
- 4.7 The pornographic industry is not at all interested in the welfare of children. It is significant that the British Board of Film Classification, speaking of R18 films said, ***“In our view ... some children would be harmed by watching these videos. We add that we believe that children would be harmed by some of the video works granted an 18 certificate”***. In response to this the pornographers stated to the Video Appeals Committee that they ***“should give little or no weight to the Board’s concern that video works of this type may damage under-age viewers”***. Following this, the Video Appeals Committee said ***“We accept the argument that we do not in general prevent adults having access to material just because it might be harmful to children if it fell into their hands”***.
- 4.8 Any society is judged by the way in which it treats its children. We are in danger of going down in history for the callous disregard we show for the damage being inflicted on children and young people by television today. If we do not exercise more self-control, we will be rightly condemned by future

generations. Explicit portrayals of sexual acts and extreme violence, coupled with the use of foul language, should never be directly or indirectly available to children. We recognise that this would mean radical changes in programming, but if we really care for our children it must be done.

- 4.9 Children are increasingly seen as targets to be exploited commercially, particularly through television advertisements. It is disappointing that the Code will not embrace broadcast advertising (except in the case of fairness and privacy in accordance with the 1996 Act) insofar as an increasing number of advertisements put pressure on children and others, often transmitted before the watershed, are highly offensive.
- 4.10 It is stated that “the guidance to help broadcasters and the public interpret the Code will be updated to respond to changes in society”, but this gives no indication of what these changes may be, other than “the way the public view broadcasting standards”. The implication is that all the control over what is broadcast will be essentially fluid in nature. This is unsatisfactory.
- 4.11 There should never be a conflict, as has been suggested, between the need to protect children and the wider needs of society. The rights of children There is no question of “balance”. Children must come first. There is no “need” of society that can outweigh the protection of children. The rights of the child to be protected from lewd and unsuitable material must always come before the rights of an adult to view it.

SEE APPENDIX A

## 5. HARM AND OFFENCE : Pornography Sections 4 & 5 of Consultation

- 5.1 Recent years have seen a steady trend towards the broadcasting of pornographic material. Some in the television industry recognise the truth that all pornography depraves and corrupts, yet gladly embrace it for straightforward reasons of increasing profits. Others still cling tenaciously to the discredited view that pornography is harmless entertainment.
- 5.2 Pornography is the explicit presentation of sexual activity to provoke erotic response. It has a particular attraction for people who are socially inadequate, sex-obsessed and emotionally disturbed. It undeniably debases human relationships. The sex act is fundamentally an intimate and private relationship and the intrusion of pornography robs the participants of their dignity as human beings. Pornography is an essential tool of the sex offender, particularly the paedophile. Large amounts of pornography are frequently found in the homes of those who have been found guilty of sexual assault against children or adults. Pornography is widely used by predators to groom their potential victims.
- 5.3 There is considerable evidence that pornography seriously damages marriage and family life and is, for many, addictive. Television producers are brazenly and improperly exploiting human weakness and susceptibility.
- 5.4 There can be little doubt that the activities of the BBFC and the VAC (both unelected and unrepresentative bodies funded by the industry) have prepared the way for the acceptance of videos and films which are pornographic and extremely violent.
- 5.5 Many of the groups involved in the huge international hardcore pornographic industry are engaged in criminal activities. **Michael Hames**, Former Head of the Obscene Publications Branch, New Scotland Yard has said that even *“the so-called ‘soft core’ material is on the margin of a vast industry which trades in human misery and vice”*. In spite of this, one of the VAC members has said *“I am not particularly keen on censorship”* and another even said *“I have never objected to normal healthy sex being portrayed...just a couple of people having sexual fun and allowing people to watch them: what harm is there in that?”*.
- 5.6 **Professor Eysenck**, the world-renowned psychologist, said *“It cannot any longer be argued with any degree of conviction that pornography...has no effect on the behaviour of the people who see these things on the screen”* and *“both behaviour and emotional reactions are affected and the effects are not transitory”*.
- 5.7 Pornography is not harmless, and is teaching an entire generation of young people distorted values about their sexuality and healthy relationships. Whether on television or elsewhere, it has directly contributed to promiscuity, the breakdown of families, increased teenage pregnancies, increased abortions and increased sexually transmitted diseases.
- 5.8 There is abundant evidence of the damage caused by pornography and of viewers replicating what they have seen. Pornography is produced solely for

the sake of financial gain and the destruction of moral standards. It can never be seen as a legitimate art form.

- 5.9 Professor Ashton**, The North West Director for Public Health, has condemned television producers for *“putting viewing figures before social responsibility”*. Referring to *“a new low in British television history”* he specifically condemned ‘Big Brother’ saying *“programme makers ... need to be more responsible about how they portray sex”*.
- 5.10 **James Ferman**, after years of service at the BBFC, admitted *“Inevitably, if you go on seeing sex and violence year after year you get habituated to it”*.
- 5.11 The proposed code introduction includes the need to “respect human dignity”. The fact remains that the intrusion of television cameras into the sacred sexual relationship between a man and woman shows scant respect for human dignity, yet is apparently considered acceptable. It is an unwarranted invasion of privacy which cheapens human relationship and frequently degrades women.
- 5.12 A recent terrestrial broadcast included a scene of a circle of men masturbating over a woman, and the use of urine in sexual activity, yet complaints about this were summarily rejected. Similarly, complaints about protracted and detailed shots of sexual activity in a brothel were dismissed and a programme about sex with animals was defended in like manner.
- 5.13 It is correctly stated that freedom of expression is an essential human right, but it is not stated that there is also a heavy responsibility to maintain standards of public morality. Although it is stated that “no material should be broadcast which incites crime” it is significant that it is not equally stated that “no material should be broadcast which encourages depravity”. It is stated that “harmful or offensive” material must be judged against “generally acceptable standards”. The implication is that harmful or offensive material is legitimate dependent upon the broadcasting company claiming it to be in accordance with “generally accepted standards”.
- 5.14 It is a pity that pornographic material is blandly referred to as ‘adult’. To use this term is to use the vocabulary of the pornography industry, which endeavours to legitimise what is illegitimate. On page 16 it is stated that “a necessary balance must be struck between the wider needs of society and the need to protect children”. It should be a firm principle of broadcasting that where the supposed “wider needs of society” conflict with the need to protect children, children should always, in every circumstance, come first.
- 5.15 Pornography should be specifically banned from all television.

SEE APPENDIX B

## 6. HARM AND OFFENCE: Violence

Sections 4 & 5 of Consultation

6.1 There have been countless unsubstantiated claims by many television producers that the behaviour presented on their programmes is not harmful and is not replicated in real life. In fact, there is now a huge amount of evidence, produced by reputable professional researchers over many years, showing there is a direct link between what television producers are showing and how people behave. This danger cannot be ignored by the industry and those responsible for regulating it any longer. The following are authoritative statements about this:

- **Professor Andrew Sims, past President of the Royal College of Psychiatry**, states, *“there is now vast anecdotal evidence associating the portrayal of violence with violent behaviour and more than one thousand papers linking violence in the media to actual behaviour”*.
- **Dr. Susan Bailey, Consultant Psychiatrist** with Salford Health Authority carried out studies of adolescent murderers influenced by violent screen images. A quarter of the young people she encountered had watched violent and pornographic films during the period immediately prior to their murdering.
- **Professor Comstock**, in his study *“TV and the American Child”*, identified *“a very solid relationship between viewing anti-social portrayals or violent episodes and behaving anti-socially”*.
- **The New Zealand Psychological Society** in a parliamentary submission identified *“a causal relationship between the amount of film violence viewed and subsequent aggressive and anti-social behaviour among both children and adults”*.
- **The American Psychological Association** concludes that research *“clearly demonstrates a co-relation between viewing violence and aggressive behaviour”*.
- **Dr. William Belson**, after a seven-year study of 1,565 London boys, concluded that the evidence of a significant relationship between TV and adolescent violence was *“as valid as connecting smoking with lung cancer”*.
- **Professor Eysenck and Dr Nias** in *“Sex, Violence and the Media”* (1978) examined the academic credentials of the hundreds of reports already published on the subject and concluded that television’s contribution to social violence was *“a powerful and omnipresent one”*. An earlier study, in which the viewing habits of 875 children in one American town were studied for 21 years, from 1960 to 1981, showed that the more children watched television up to the age of eight, the more serious were the offences they subsequently committed.
- **A US Congressional Committee headed by Senator Simon** conducted hearings on violence on television and concluded that the research linking screened and actual violence is *“just overwhelming”*, and that there is no question that a *“causal factor”* is involved.
- **Elizabeth Stutz**, in a survey of 500 children aged 7 - 14, (Norwich 1990 - 91) reported, *“many children told about the pangs of extreme fear and nightmares they suffer as a result of the horrific programmes, some taking several years to harden themselves to these. However, the influence of*

*excessive and compulsive screen viewing and computer playing, shortens childhood by several years.*”

- **Dr. Michael Rothenberg** wrote in the Journal of the American Medical Association, (1975). *“One hundred and forty six articles in behavioural science journals, representing 50 studies involving 10,000 children and adolescents from every conceivable background, all showed that viewing produced increasing aggressive behaviour in the young...”*
- **Dr Clifford Yorke**, a leading Psychoanalyst stated on BBC Radio 3, *“explicit films of sexual and violent acts may indeed be obtained by children. It is known by those in the profession that some adults encourage and even enforce child viewing of the these so-called ‘adult’ movies.”*
- **Professor Elizabeth Newsom**, in her report ‘Video Violence and the Protection of Children’ (1994), examined the case of the James Bulger murder by two ten-year-old boys and other instances of cruelty by children and asked the question *“what, then, can be seen as the ‘different’ factor that has entered the lives of countless children and adolescents in recent years? This has to be recognised as the easy availability to children of gross images of violence on video”*.
- **Professor Daniel Linz**, Professor of Psychology at the University of California has spent years researching the link between make-believe brutality and real world aggression and he says, *“the consensus among social scientists is that very definitely there is a causal connection between exposure to violence in the media and violent behaviour.”*
- **Dr Robert Gould**, Professor of Psychiatry at New York Medical College, said, *“the younger the viewers are the more suggestible they are - and more likely to act out violently”*.
- **Sir Paul Condon**, Commissioner of the Metropolitan Police, has stated that there is compelling evidence that lack of family stability and a mistaken view of violence acquired in video arcades and from unlimited access to television can be very destructive. He predicted a murderous “harvest” from violent videos.
- **Professor Sir Martin Roth** (May 1977) *“children exposed to scenes of aggressive and violent conduct exhibit an increase in such behaviour as compared to those not so exposed.”*
- **Dr.H.Brandon Centerwell**, psychiatric researcher formerly with the University of Washington, claims that it is the young children exposed to TV violence in the 1950’s and 1960’s who later fuelled the dramatic increase in murder and property crime. He says that without TV violence rates of crime would have been halved.
- **The British Medical Journal** of 5th February 1994 reports two psychiatrists at a hospital in Coventry dealing with two ten-year-old boys damaged by watching the programme “Ghost Watch” on Halloween. They specifically stated, *“the trauma in our two cases have been caused by the television programme the boys had watched”*.
- **Professor Inga Sonesson** of the University of Lund studied 200 children in Malmo, Southern Sweden, aged 6 to 16. The material showed that among boys in particular, there was a pronounced correlation between emotional disturbance and intensive viewing of television, as six-year-olds developed more aggression than their contemporaries, and later in life continued to watch violent films. This often led to behavioural problems such as vandalism, hooliganism and theft. He also found that girls were strongly influenced by horror films. They lost their ability to concentrate and had

frequent nightmares. The study showed that in all, 14% of the children who watched more than two hours television a day at six years old were rated as being more aggressive in their class, and watched considerably more video violence than their classmates.

- **The Professional Association of Teachers (PAT)** spoke to 1000 teachers in different parts of the country. More than 90% of the PAT respondents believed that children's emotional, social and moral development is being damaged, sometimes irrevocably, by what they see.
- **A Hampshire Constabulary Vice Squad officer** stated *"I can confirm that I have personal knowledge of five cases within the last year where a sexual offence is directly connected to pornography. In four of these cases the offender showed the victim the pornography in video format in order to facilitate an indecent act between them. In the fifth case sexual offences were committed against boys and filmed with a view to the distribution of the material."*
- **Superintendent Mike Haines** of the Obscene Publications Branch of New Scotland Yard said in December 1990, *"of one thing I am certain..... Wherever you find sexual crime, so you will also find pornography. The link is indisputable. It is startlingly clear in the collections of obscene and violent pictures and words hoarded by people we arrest for sexual crimes. It is an addiction and, like any other craving, it needs constant feeding. If you look at the material that we are seizing, the percentage of the bizarre and sado-masochistic is increasing all the time and pornographers are telling us those lines are their best sellers."*
- **Lord Scarman**, reporting on the rioting in 1981 in his document 'The Brixton Disorders', said *"The media, particularly the Broadcasting Media do, in my view, bear a responsibility for the escalation of the disorder (including looting) in Brixton ... and for their continuation the following day and for the imitative element in the later disorders elsewhere"*.
- **The Royal Society for the Prevention of Accidents** has published the results of a survey involving 91 headteachers of primary schools. 91% confirmed that there was a link between violent television programmes and aggressive behaviour in schools. 79% said there had been incidents of injuries linked to copy-cat play and gave the following instances. In view of the kind of aggressive behaviour exhibited, it is highly significant that no less than 52% mentioned the television programme "Power Rangers" by name.

6.2 Commercial marketing research indicates that buying habits are directly influenced by comparatively short television advertisements. If this were not so, companies would cease advertising. Vast sums of money are spent on television advertising and yet television companies put themselves in the curious position of suggesting that the films and advertisements they transmit do not, in fact, directly influence human behaviour. If this were not so, they would lose their advertising revenue.

6.3 Steps should be taken immediately to spell out those types of extreme violence which will not be allowed to be shown on television.

SEE APPENDIX C

## 7. REGULATORY INFLUENCES

Sections 1, 2 & 3 of Consultation

### 7.1 The British Board of Film Classification

The BBFC is the regulatory authority for the industry and exercises considerable power in deciding the nature of this influence upon our way of life. During recent years it has been the subject of extremely widespread public criticism, largely because it has presided over and approved an ever-increasing content of violence, sex and foul language in films. Although recognised by the Government it is essentially a non-statutory body, funded by the film industry whose prime aim is to make profit. There is now a substantial body of opinion in the United Kingdom that it has failed in its self-policing role and should be abolished. It has been suggested that it should be replaced by a body totally independent of the film industry and directly responsible to Parliament.

### 7.2 The Video Appeals Committee

The VAC is a group of individuals who have been given the power to hear appeals from the industry against decisions of the BBFC. The VAC is a little-known, unrepresentative and unelected group of people, most of whom are drawn from the media. The appointment of the President of the VAC is approved by the Home Secretary, but the President personally appoints each member. The criteria concerning the suitability of potential members of the committee are not known and neither is the date of their termination of office. The public has no rights to seek the removal from office of any or all of the members of the committee and no right to question, challenge or reverse the decisions of this committee even though it exercises an enormous influence over the moral life of the nation. There has been growing and widespread public criticism of the activities of the VAC largely because of its readiness to approve pornographic films for distribution to the public under the R18 classification. The VAC wields great power without having to answer to Parliament or to the public. It has been used to flood the high street with pornographic videos and there is now widespread demand for its abolition. Both the VAC and BBFC have failed to protect the public from degrading material and there is now an urgent need for the Government to establish a totally new system of regulation for the industry.

### 7.3 The R18 films

On the admission of the VAC *“the whole purpose of the R18 certificate is to cater for those whose tastes are for works which may be said to be filthy and lewd”*. It has never been explained to the public why registered shops should be set up on a nationwide basis for the promotion of filth and lewdness. The highly controversial opening of registered sex shops happened primarily because of pressures brought to bear by the pornography industry seeking outlets for pornographic printed material. Many of these establishments were opened against fierce opposition from local residents who felt that they had been imposed upon them against their will. The decision of the VAC to support the production of seven pornographic videos against the judgement of the BBFC, itself not renowned for its concern in these matters, gave rise to widespread public concern. When a judicial review upheld the VAC’s proposals the stage was set for the sale of thousands of degrading pornographic films throughout the country. This was done without any Parliamentary debate and without any public consultation whatsoever. This has horrified many

people who recognise the real damage this will inevitably inflict upon national standards of morality and particularly upon children. Under no circumstances should these films ever be allowed to be transmitted on television in this country.

#### **7.4 Laws, rules and directives**

The Broadcasting Act (1990) clearly states in section 6 (1)(a) that “Nothing is included in programmes which offends against good taste or decency, or is likely to encourage or incite or lead to disorder, or to be offensive to public feeling”. The BBC committed itself to meet these requirements, but has failed to keep its word.

The British Government is a signatory to the revised European Convention on Trans-Frontier Television which came into force on 1<sup>st</sup> March 2002, and which states in Article 7 (1)(a & b) that programmes “shall not be indecent and in particular contain pornography” and “shall not give undue prominence to violence or be likely to incite to racial hatred”. The Government has abdicated its responsibility in this respect.

Britain is also a signatory to the Television Without Frontiers directive, which states in Article 22 that member states shall ensure that programmes “do not include programmes which might seriously impair the physical, mental or moral development of minors, in particular those that involve pornography or gratuitous violence”. Neither the British Government, nor the Television industry, has taken any serious steps to prevent the inclusion of pornography or gratuitous violence.

There is a widespread feeling that the industry, the controllers and Government have not adequately taken into consideration the concerns of the listening and viewing public.

## 8. MORAL STANDARDS

Sections 1, 2 & 3 of Consultation

- 8.1 There appears to be a marked reticence on the part of Ofcom in Section Two to make any reference to moral standards.
- 8.2 It is difficult to avoid the conclusion that because of a vague commitment to plurality and diversity, Ofcom is not prepared to commit itself to any absolute standard of what is right or wrong.
- 8.3 Thus, what should be ethical decisions are presented as primarily ones of personal opinion or what is deemed to be the prevailing mood at the time.
- 8.4 It would appear that decisions on public morality will continue to be taken by unrepresentative and unelected groups, which arbitrarily decide what they believe to be acceptable or unacceptable, right or wrong, good or bad. This is the surest way of moving towards an ‘anything goes’ situation in which all moral standards and questions of decency are abandoned., and in which libertarianism rules.
- 8.5 In response to complaints about a particularly offensive programme with explicit sexual content and containing strong language, Ofcom recently stated ***“The programme had been edited to comply with our Code rules and was broadcast in an appropriately scheduled and signposted context”***. The issue of moral standards was not addressed and Ofcom simply said, ***“The Programme Code states that ‘television licensees may make programmes about any issues they choose’”***.
- 8.6 In defending this particular programme, Ofcom stated ***“the standards imposed by the regulator in respect of sexual portrayal takes full account of the findings of public opinion research. These suggest that the British public is less concerned about sexual subject matter on screen than was once the case....”*** No specific public opinion poll was referred to and what was meant by *“less concerned”* was not made clear. In any case, are morals to be decided on the basis of public opinion polls?
- 8.7 The television industry euphemistically calls pornographic programmes ‘adult material’ and, to the amazement of many, Ofcom recently stated that ***“adult material can have a place in broadcasters’ schedules if properly treated”***. Ofcom does not explain what it means by *“properly treated”*. Similarly, it does not explain what it means when it uses the phrase *“generally accepted standards”*. Presumably, this means the personal judgement of the producer.
- 8.8 It is a matter of great concern that Ofcom is proposing to replace *“good taste and decency and public feeling requirements”* with *“generally accepted standards”*. Viewers will be concerned that it is suggested that *“material that has the potential offend may be used”*. It seems reasonable to expect that any code laid down for broadcasting standards will specifically discourage the broadcasting of potentially offensive material. Vague reference is made to *“adequate protection”* from the inclusion of harmful and offensive material, but the nature and form of this *“protection”* is not defined. This is particularly serious, insofar as most complaints about broadcasting standards are made

retrospectively. There is considerable and substantive evidence of actual harm being caused by television programmes. The television industry can not continue to ignore this.

- 8.9 The allowing of the free use of the F... swear word on television programmes during the past three years has surprised and deeply offended many people. The decision to allow its use was clearly made privately, without the knowledge of the general public, and certainly without the approval of the elected representatives of the public in Parliament. This was a unilateral decision made by people with no understanding of their responsibility to society. It is neither helpful nor accurate for Ofcom to say that it “*recognises that offensive language is... a feature of modern society and may be legitimately used in broadcasting*”.
- 8.10 The television and broadcasting industry needs to make it clear to the public whether or not they recognise the existence of any absolute moral standards.
- 8.11 The Code should not skirt moral issues, but spell out the firm commitment of Ofcom to the upholding of public moral standards. Unless it does this, there seems little purpose for Ofcom to exist.

SEE APPENDICES A, B AND C

## **9. BROADCASTING AND RELIGION**

Section 7 of Consultation

- 9.1 Although there have been a number of high quality religious programmes, religion is being steadily marginalised, and there is a widespread feeling that it is not being taken seriously by the industry. ITV have already expressed their desire to escape from their obligation to have a minimum number of hours dealing with religion. Last year, The Independent Television Commission stated that there has been a decline in religious programmes across all commercial channels.
- 9.2 With the obvious constraints imposed by political correctness, and the commitment of programme producers to pluralism and inter-faith compromise, religious broadcasting has become bland and inhibited. The sharpness of belief statements and the glory of Christian prayer and worship is being lost.
- 9.3 Although 73% of the population claim allegiance to the Christian faith, according to the recent National Census, and it is claimed that more people go to Church than attend football matches, there appears to be a very considerable bias in many and perhaps most broadcasts. There is a sense in which God has been expelled from British broadcasting, in spite of our rich Christian inheritance.
- 9.4 Apart from the huge and continuing emphasis on programs dealing with Islam, we have seen the emergence of an all-powerful secular humanist influence in the media. This has led to the sweeping away of many of the moral constraints of the past. There has been a steady increase in the use of broadcast language and images, which insult and treat with utter contempt the sacred names of Jesus Christ and Almighty God. Profanity has become commonplace on television and radio. Furthermore, it is highly significant that broadcasters deliberately coincide programmes critical of the Christian faith with the great Christian festivals.
- 9.5 There is growing concern about the danger of influences being brought to bear on Christian broadcasters to dilute their beliefs and even to silence their witness. There was widespread concern when the Independent Broadcasting Authority warned Premier Radio over their reference to occult practitioners.
- 9.6 There are signs that freedom to express the Christian faith in the way that it has been practised for centuries in this country is in danger. The foundations of our society are inherently Christian. It is important that basic statements of Christian faith are not in anyway inhibited.
- 9.7 The neglect of the spiritual dimension of life and the failure to recognise and celebrate the great Christian inheritance in our land is an aspect of broadcasting that should give rise to deep concern.

SEE APPENDIX D

## 10. ANSWERS to specific Consultation Questions

### □ SECTION 3 Ofcom Broadcasting Code Introduction

#### Question 3a:

*Does the introduction appropriately set out the purpose and background of the Code and does it achieve the right balance between giving broadcasters creative and editorial freedom while protecting listeners and viewers?*

The right balance is not achieved. There is insufficient protection for listeners and viewers.

#### Question 3b:

*Should there be one Code or more than one Code? (Please see the RIA in section 14 of this consultation for further information.)*

There should only be one code to avoid confusion.

#### Question 3c:

*Is the approach suggested by Ofcom the best approach to the proposed new Code/s? If not, is there a better approach and, if so, what? (Please see the RIA in section 14 of this consultation for further information.)*

The suggested approach is unsatisfactory because the “lightest possible touch” implies the toleration of a still more libertarian approach to programme regulation. Far more attention needs to be given to the root causes of offence and harm.

#### Question 3d:

*Should the Code differentiate between different types of services with different rules for different services, or does the proposed approach allow sufficient latitude for services to interpret the rules appropriately for their audiences? (Please see the RIA in section 14 of this consultation for further information.)*

The code should not differentiate between different types of services. There should be a consistency of standards applied to all broadcasters to avoid confusion.

### □ SECTION 4 Protecting the Under Eighteens

#### Question 4a:

*Are the principles, rules and meanings necessary, consistent, proportionate and achievable? If not, can the wording be improved and if so how?*

It is highly unlikely that under 18s will be adequately protected by the proposed code. Definitions need to be far more precise.

#### Question 4b:

*Are there any principles, rules or meaning we have not put here which would achieve the intentions of the Communications Act and other applicable legislation and be necessary, consistent, proportionate and achievable?*

Although efforts have been made to effectively interpret the aims of the Communications Act, various wrong assumptions are made for example “that offensive language is a feature of modern society”. There should never be a conflict as suggested between the need to protect children and the wider needs of society. There is no question of “balance”. Children must come first. There is no “need” of society that can outweigh the protection of children. To hold onto the concept of a watershed as an adequate protection for children is totally unrealistic.

#### Question 4c:

*Are the proposed definitions of children and young persons appropriate?*

The definitions used are appropriate.

**Question 4d:**

Do we need rules regarding violence and dangerous behaviour, smoking, drug taking etc as proposed in the Code or are such matters already covered by other rules?

These rules are necessary but would benefit from being more specific.

**Question 4e:**

Which of the options described in the RIA regarding the watershed on premium subscription services is the best option and why? (If a new place is proposed for the watershed, what is it, and why?) What technical and other protections can broadcasters and platform operators put in place to protect children?

Under no circumstances should any R18 or R18 standard material ever be broadcast on television. There are few known methods to effectively protect children from corrupting material on Television. The only effective way is to stop the transmission in the first place. It must be recognised that the watershed has been proved to be a completely ineffective method of protecting children. A compromise solution might be to make the watershed 11.30 pm.

**Question 4f:**

Which of the options described in the RIA on the scheduling of programmes regarding the paranormal is the best option and why?

We strongly recommend option 1 and we believe special attention should be given to the dangers of presenting witchcraft, pagan and occultic practices at any time.

**Question 4g:**

Should cash prizes be specifically forbidden in children's programmes?

Cash prizes other than modest amounts should be forbidden in children's programmes.

**Question 4h:**

Should there be rules linking the scheduling of films to the BBFC classifications?

Because of the breakdown in public confidence in the BBFC, there should be no links whatsoever to this body which is funded by the film industry itself.

**SECTION 5  
Harm and Offence**

**Question 5a:**

Are the principles, rules and meanings necessary, consistent, proportionate and achievable? If not, can the wording be improved and if so how?

The code should explicitly preclude all pornographic presentation of sex acts, and all close-up depictions of injuries inflicted.

**Question 5b:**

Are there any principles, rules or meaning we have not put here which would achieve the intentions of the Communications Act and other applicable legislation and be necessary, consistent, proportionate and achievable?

To replace "good taste and decency" with "generally accepted standards" is totally unsatisfactory, and enables broadcasters to make their own definition of what is 'acceptable'. To require "adequate protection" is of no value unless the words "adequate" and "protection" are clearly defined.

**Question 5c:**

Should a rule on hypnosis be included and if so what evidence of harm or potential harm is there regarding the use of hypnosis on television or radio audiences?

The rule on hypnosis should be included. There is a considerable body of clinical evidence to show actual and potential dangers of hypnosis - on or off the screen.

**Question 5d:**

Is the inclusion of R18 and R18 standard material compatible with the TWF Directive which requires that nothing is included in licence services which might seriously impair the physical, mental or moral development of minors?

The inclusion of R18 and R18 standard material is totally incompatible with the TWF directive and should, under no circumstances, be seriously considered. To include this material would be to inflict deep and lasting harm upon our national life.

**Question 5e:**

If the answer to 5d is yes, then are there technical and other protections that broadcasters and platform operators can put in place to protect the under eighteens, who should not, and adults, who may not wish to, access R18 and R18 standard material? (the Act section 319(2)(a)(f) and 319(4))

N/A

**Question 5f:**

Which of the options described in the RIA regarding R18s, and R18 standard material is the best option, and why?

Prohibition of R18 and R18 standard material does not constitute an “unnecessary regulatory burden”. It is merely a decision to stop invasive pornography. The survey of public opinion quoted in para 47 (p94) is, to say the least, totally unrepresentative of public opinion. There is widespread evidence of the repugnance of vast numbers of ordinary people against this kind of sordid material. Ofcom should not be concerned with “inhibiting the commercial development” of pornography as is suggested. We, therefore, advocate Option 1.

**Question 5g:**

Should the restrictions in place regarding transmitting 'adult' sex material on certain premium subscription services, PPV and PPN services be changed, and if so what restrictions should be in place, and on which services?

There is growing public outrage about the proven links between pornography and sexual violence against women and children. We have now reached the stage where serious consideration is being given to closing down all stations transmitting pornography. Existing restrictions should be retained and, wherever possible, strengthened.

**Question 5h:**

Should there be a prohibition on the transmission of films, videos and DVDs refused a BBFC certificate. If not should there be any rule and if so what rule?

Under no circumstances should material that has been refused a BBFC certificate be transmitted. The basic rule should be the exclusion of all pornographic and extremely violent material.

**Question 5i:**

Can a lesser level of technical intervention achieve the same protection for those with photosensitive epilepsy?

We believe the ITC guidance notes should continue to apply.

**SECTION 6**  
**Crime**

**Question 6a:**

Are the principles, rules and meanings necessary, consistent, proportionate and achievable? If not, can the wording be improved and if so how?

The rules laid down are acceptable. There is an urgent need for a balance of scheduling of programmes to ensure there is not an excessive number of programmes containing any violence shown consecutively.

**Question 6b:**

Are there any principles, rules or meaning we have not put here which would achieve the intentions of the Communications Act and other applicable legislation and be necessary, consistent, proportionate and achievable?

Careful consideration should be given to the dangers of replication of material shown in antisocial behaviour, such as vandalism, graffiti, and car abuse.

**SECTION 7**

**Religion**

**Question 7a:**

Are the principles, rules and meanings necessary, consistent, proportionate and achievable? If not, can the wording be improved and if so how?

These are reasonable but it is important to recognise the substantial influence of the Christian faith in the life and history of this nation. It is important that the church is able to proclaim the gospel without restriction and that members of all faiths may speak freely about their different convictions. It must be recognised that there are fundamental differences and that these can be addressed without ill will.

**Question 7b:**

Are there any principles, rules or meaning we have not put here which would achieve the intentions of the Communications Act and other applicable legislation and be necessary, consistent, proportionate and achievable?

We accept the spirit of these rules but believe that great care needs to be taken in the definition of the words “abuse” and “improper exploitation” to ensure that freedom of expression is not inhibited.

**Question 7c:**

Which of the options regarding appealing for funds for religious programmes and/or services described in the RIA, section 14 of this consultation should Ofcom include in the Code and why?

The ability to raise funds on air is crucially important for specialist Christian broadcasters. The current prohibition puts UK-based broadcasters at risk of closure. However, relaxation of the rules that lead to the exploitation of “peoples’ susceptibilities purely for commercial gain” is clearly reprehensible. None of the three options deal satisfactorily with the need to strike a balance. At the moment Christian broadcasters appear to be penalised whilst pornographers are encouraged. A fourth option is needed which allows for responsible fundraising by specialist broadcasters.

**Question 7d:**

Should religious programmes on non specialist television services be allowed to recruit?

There is no reason why religious programmes should be prevented from allowing recruiting.

**Question 7e:**

Does the final rule in this section provide sufficient protection for children and susceptible audience members or is it, conversely, too protective?

This depends on what is meant by “special powers or abilities”. There are many people who have special gifts who should not be prevented from exercising their abilities. Emphasis should be placed upon the outcome of the ministry.

**SECTION 8**  
**Due Impartiality and Due Accuracy and Undue Prominence of Views and Opinions**

**Question 8a:**

Are the principles, rules and meanings necessary, consistent, proportionate and achievable? If not, can the wording be improved and if so how?

The rules proposed are achievable provided there is a total commitment to impartiality and accuracy.

**Question 8b:**

Are there any principles, rules or meaning we have not put here which would achieve the intentions of the Communications Act and other applicable legislation and be necessary, consistent, proportionate and achievable?

Presentation of news is frequently based upon pre-determined attitudes and world views. There are undoubted dangers in the constant presentation of news from an entirely secular point of view. The achievement of supposed neutrality in programme presentation is often based upon the false assumption that doubt is always superior to belief. Principles and rules therefore have to consider the inevitable interpretative nature of presenting facts. Presentations that do not conform to the dominant secular world-view should therefore not be penalised.

**Question 8c:**

Does this section encourage imaginative and challenging programming on controversial matters?

It does give sufficient encouragement.

**Question 8d:**

In particular do rules 5.11, 5.12 and 5.13 and the associated meanings of "personal view" and "authored" programmes give broadcasters enough flexibility to produce challenging programmes while ensuring that the Act is complied with?

The proposed rules do give broadcasters enough flexibility but there is a danger of the dominance of programmes by certain celebrities and the production of contrived programmes. It must be recognised that in many current affairs' programmes, contributors are only selected if they conform to the pre-set aim of the producer.

**Question 8e:**

Would appropriate labelling help the UK audience understand the nature of retransmitted news services (not primarily intended for the UK market)?

The audience always has the right to be informed of the source of retransmitted items.

**SECTION 9**  
**Election and Referendum Reporting**

**Question 9a:**

Are the principles, rules and meanings necessary, consistent, proportionate and achievable? If not, can the wording be improved and if so how?

The proposals are achievable and we support them.

**Question 9b:**

Are there any principles, rules or meaning we have not put here which would achieve the intentions of the Communications Act and other applicable legislation and be necessary, consistent, proportionate and achievable?

New political parties or movements should not in any way be penalised.

**SECTION 10**  
**Fairness**

**Question 10a:**

Are the principles, rules and meanings necessary, consistent, proportionate and achievable? If not, can the wording be improved and if so how?

The proposals are fully supported and are achievable.

**Question 10b:**

Are there any principles, rules or meaning we have not put here which would achieve the intentions of the Communications Act and other applicable legislation and be necessary, consistent, proportionate and achievable?

The proposals appear to adequately cover the issue of fairness.

**SECTION 11**  
**Privacy**

**Question 11a:**

Are the principles, rules and meanings necessary, consistent, proportionate and achievable? If not, can the wording be improved and if so how?

We support the proposals, which we believe to be achievable.

**Question 11b:**

Are there any principles, rules or meaning we have not put here which would achieve the intentions of the Communications Act and other applicable legislation and be necessary, consistent, proportionate and achievable?

Greater emphasis should be given to the dangers of highly selective editing of interviews and camera shots which can easily distort the truth.

**SECTION 12**  
**Sponsorship**

**Question 12a:**

Are the principles, rules and meanings necessary, consistent, proportionate and achievable? If not, can the wording be improved and if so how?

The proposals are sensible and workable.

**Question 12b:**

Are there any principles, rules or meaning we have not put here which would achieve the intentions of the Communications Act and other applicable legislation and be necessary, consistent, proportionate and achievable?

The proposals are sufficiently comprehensive. Greater emphasis should be given to public interest.

**Question 12c:**

Should the current rules for television sponsorship be changed to allow non-promotional references to the sponsor in the programme they are sponsoring?

Current rules should not be changed as the move towards commercialisation has gone far enough.

**Question 12d:**

Should the rule restricting the content of sponsorship credits on television be changed and is the proposed rule (9.17) in the draft Code appropriate?

The distinction between sponsorship credits and advertising should be maintained.

**Question 12e:**

Should Ofcom remove the 5 second limit on sponsor references in programme trailers, and is it appropriate to replace it with a requirement that sponsor references in trailers remain brief and secondary?

The five-second limit should be maintained to avoid excessive intrusion.

**Question 12f:**

Does the Code require a rule that contains more detailed description of what is an acceptable sponsorship message than that proposed in the Code (rules 9.8 and 9.9)?

The code does not require a more detailed description of sponsorship messages.

**Question 12g:**

Should the restriction on the length of sponsorship credits for ITV, Channels 4 and Five be removed?

All television channels should be subject to the same rules.

**Question 12h:**

Are the rules relating to credits (9.8 to 9.18) in the proposed Code sufficient to ensure transparency and maintain separation?

These rules are clear and workable.

**Question 12i:**

Is it appropriate to retain the prohibition on the sponsorship of a whole TV channel or radio station?

Any move to end the prohibition of the sponsorship of the whole TV channel or radio station should only be made if the sponsorship does not interfere with the programming or achievement of impartiality.

**Question 12j:**

How can the rules on sponsorship by betting and gaming companies best be consolidated for radio and television?

We believe that sponsorship by gaming and betting companies of any programme directly or indirectly connected with gaming should be prohibited.

**SECTION 13**  
**Commercial References and Other Matters**

**Question 13a:**

Are the principles, rules and meanings necessary, consistent, proportionate and achievable? If not, can the wording be improved and if so how?

The basic principles put forward are acceptable.

**Question 13b:**

Are there any principles, rules or meaning we have not put here which would achieve the intentions of the Communications Act and other applicable legislation and be necessary, consistent, proportionate and achievable?

The abuse of premium-rate numbers needs to be assessed and if necessary appropriate changes made to the Code of Practice issued by the Independent Committee for the Supervision of Standards of Telephone Information Services (ICSTIS).

**Question 13c:**

Should there be a rule for both radio and television relating to how viewer and listener competitions are conducted, and should there be a rule that limits the use of competitions with brand mentions to within programmes?

Basic guidelines of fairness and integrity should be laid down.

**Question 13d:**

Are the rules for charity appeals appropriate and should they be extended to include radio?

The rules are appropriate and should be extended to include radio but it should be stipulated that broadest possible range of charities should be involved.

**Question 13e:**

Is the provision for community service announcements appropriate and should it be extended to include radio?

The provision of community service announcements is appropriate and should include radio.

**Question 13f:**

Should broadcasters be allowed to promote programme-related material wherever that is relevant and editorially justified in the programme?

This is acceptable conditional upon broadcasting opportunities not being abused.

**Question 13g:**

Should the rule prohibiting television services appealing for funds to make programmes and fund services be removed, kept or altered? If altered - then how should it be altered? Please see the RIA, section 14 of this consultation for further information.

Christian and other religious broadcasters should have the right to appeal for financial support for both specific programmes and the station operation.

**Question 13h:**

If the rule referred to in 13g is removed, will this provide a complimentary mechanism for raising funds or will it be a substitute mechanism?

This will be a complementary mechanism.

**Question 13i:**

Given the substantial market share held by some channels, would this have a distortive effect, in which case should Ofcom use its competition powers?

Ofcom will always exercise its powers to ensure healthy competition.

**Question 13j:**

Should there be rules regarding merchandising or not? And if so what rules? Please see the RIA in section 14 of this consultation for relevant arguments.

There should be rules regarding merchandising. These should prevent exploitation ensure acceptable standards.

**SECTION 14**  
**Regulatory Impact Assessment**

**Question 14a:**

Has this RIA correctly identified the significant changes (as described in the opening paragraph of the RIA) made in this consultation paper. If not, what other changes are significant, and why?

Significant changes have been identified.

**Question 14b:**

Do you disagree with the assessment of benefits and disadvantages drawn up in this RIA and, if so, how would you suggest it should be altered?

We believe that, in general, the benefits and disadvantages of possible changes to the Code have been presented fairly.

**Question 14c:**

Can you assist with information which will help us quantify the increased costs or savings of the various options in this RIA?

Comments included in this paper and our responses to the questions should not financially affect broadcasting bodies, other than those engaged in pornography.

## **APPENDIX A : Children**

### **1. Children, television and violence**

According to Professor the Lord Robert Winston, the average 3 or 4 year old British child watches TV for around five hours each day and more than 50% of 3 year olds have TVs in their bedrooms. In America by the time they are 18, American children will have seen around 16,000 simulated murders and 200,000 acts of violence on TV. Professor Winston has quoted a research project carried out by Dr. Jeffrey Johnson in New York and Dr. Huesmann of the University of Michigan revealing that aggressive traits are increased in young viewers even when other factors such as social deprivation, intelligence and parenting are taken into account. The US National Television Violence study reviewed roughly 10,000 hours of broadcast programming between 1995 and 1997 and discovered a staggering 61% of the programmes portrayed violence between people – often highly glamorised.

### **2. US experience: Media Violence**

Excerpt from a joint statement by *the American Academy of Paediatrics, American Academy of Child & Adolescent Psychiatry, American Psychological Association, American Medical Association, American Academy of Family Physicians and the American Psychiatric Association*: (link: [www.aap.org/advocacy/releases/jstmtevc.htm](http://www.aap.org/advocacy/releases/jstmtevc.htm)).

Television, movies, music, and interactive games are powerful learning tools, and highly influential media. These media can, and often are, used to instruct, encourage, and even inspire. But when these entertainment media showcase violence - and particularly in a context which glamorises or trivialises it - the lessons learned can be destructive.

At this time, well over 1000 studies - including reports from the Surgeon General's office, the National Institute of Mental Health, and numerous studies conducted by leading figures within our medical and public health organisations - our own members - point overwhelmingly to a causal connection between media violence and aggressive behaviour in some children. The conclusion of the public health community, based on over 30 years of research, is that viewing entertainment violence can lead to increases in aggressive attitudes, values and behaviour, particularly in children. Its effects are measurable and long lasting. Moreover, prolonged viewing of media violence can lead to emotional desensitisation toward violence in real life.

The effect of entertainment violence on children is complex and variable and there are several measurable negative effects of children's exposure to violent entertainment. These effects take several forms.

- Children who see a lot of violence are more likely to view violence as an effective way of settling conflicts. Children exposed to violence are more likely to assume that acts of violence are acceptable behaviour.
- Viewing violence can lead to emotional desensitisation towards violence in real life. It can decrease the likelihood that one will take action on behalf of a victim when violence occurs.
- Entertainment violence feeds a perception that the world is a violent and mean place. Viewing violence increases fear of becoming a victim of violence, with a resultant increase in self-protective behaviours and a mistrust of others.

- Viewing violence may lead to real life violence. Children exposed to violent programming at a young age have a higher tendency for violent and aggressive behaviour later in life than children who are not so exposed.
- Although less research has been done on the impact of violent interactive entertainment (video games and other interactive media) on young people, preliminary studies indicate that the negative impact may be significantly more severe than that wrought by television, movies, or music.’

### **3. Further US Experience : Media violence**

**Excerpt from the Public Health Summit on Entertainment Violence Washington, DC, July 26, 2000; Michael Rich, American Academy of Pediatrics.**

*“Television and Movies:* For children and adolescents in the year 2000, violence is the most prevalent health risk. Homicide, suicide and accidents are the top three causes of death for those 15 - 24 years old. Research has shown that the strongest factor contributing to violent behavior is previous exposure to violence. Epidemiologists studying factors associated with violence, including poverty, racial discrimination, substance abuse, inadequate schools, joblessness and family dissolution, found that exposure to violent media was a factor in half of the 10,000 homicides committed each year. 1<sup>st</sup> and 2<sup>nd</sup> graders were observed before and after television was introduced to their remote town. Their aggression levels increased 160% after two years of TV exposure. A study begun in the early 1960s found that boys who watched more television had higher levels of aggression at age 8, a history of aggressive behavior at age 19, and were more violent with their children and had been convicted of more violent crime by age 30. The findings of hundreds of studies, analyzed as a whole, showed the strength of the relationship between television exposure and aggressive behavior to be greater than that of calcium intake and bone mass, condom non-use and sexually transmitted HIV, lead exposure and lower I.Q., or passive tobacco smoke and lung cancer, associations upon which we routinely base public health interventions. Children learn the ways of the world by observing and imitating -- they cannot help but be influenced by media.”

### **4. Further US Experience: Aggression fuelled by childhood TV violence**

According to a study by a team from the University of Michigan, boys and girls who watch violent television programmes are at greater risk of being aggressive as young adults. The study reported in the journal ‘Developmental Psychology’ found that men who watched a lot of television violence as children were significantly more likely to have pushed, grabbed or shoved their spouses. They were more likely to have responded to an insult by shoving a person, to have been convicted of a crime and to have committed a traffic violation. Such men, for example, have been convicted of crimes at three times the usual rate. Similarly, women who saw a lot of violence on television as children, were more likely to have responded to someone who made them angry by shoving, punching, beating or choking the person, or to have committed some kind of criminal act. They reported having punched, beaten or choked another adult at four times the rate of other women. Dr. Huesmann, one of the researchers said *“For boys and girls habitual early exposure to TV violence is predictive of more aggression by them later in life independent of their own initial childhood aggression”*. A team led by Professor Jeffrey Johnson of

Columbia University and a New York State Psychiatric Institute, last year concluded after a study of 700 children, that during early adolescence responsible parents should not let children watch more than one hour of television a day. They said “*Despite the consensus among experts, lay people do not seem to be getting the message from the popular press that media violence contributes to a more violent society*”.

## **5. US experience: Sexuality, contraception and the media**

Sexuality, Contraception and the Media. A Policy statement (RE9505) of the American Academy of Paediatrics quoted in ‘Paediatrics’ Volume 95, Number 2 February, 1995, p 298-300.

The statement contains the following comments:

- “A number of studies demonstrate that television powerfully influences teenagers' sexual attitudes, values, and beliefs”. “In the media, sex is often associated with humour, excitement, danger, or outright violence”;
- “Television reinforces stereotypical images of masculinity and femininity by suggesting a double standard in which marriage seems important only to women, and non-marital intercourse is depicted as acceptable behaviour”.
- “On television, and particularly in the movies, abstinence among teenagers is rarely portrayed in a positive fashion”.
- “Overabundance of sexual messages permeating television programming and contained in rock music and music videos”
- “Paediatricians should encourage discussions between patients and their families on the effect of media on sexual behaviour”.

The recommendations of the Academy include:

- “Paediatricians and the Academy should encourage the broadcasting industry to use public service announcements that promote abstinence. Just as strongly, the use of public service announcements that promote the use of condoms to prevent STDs and pregnancy for teenagers and adults who are already sexually active should be encouraged”.
- “Paediatricians, the Academy, and the broadcast industry should support further research into the impact of sexual content in the media on children and adolescents' knowledge and behaviour”.

## 6. Youngsters viewing late-night adult shows

According to a recent study 79% of all children now have a television in their bedroom. Half of 8-14 year olds watch a minimum of four hours of television a day and a third of children below the age of 6 watch television for between two and six hours a day. More than three-quarters of the primary school children who stayed up late continued watching beyond 11pm, often into the early hours of the morning. The survey indicated that a significant number of children have tried to replicate on screen violence. One 11 year old said he had “*kicked someone in the face*” after seeing it on television, while another mentioned copying violence in ‘The Bill’ the ITV police drama. 92% of secondary school children watch television after 9pm. Margaret Morrissey, a spokesman for the national Confederation of Parent Teacher Associations, attacked broadcasters for pushing the limits of the watershed. She said “The parents job is not made easier by the fact that so much sex and violence is now part of the mainstream”. A joint study by the Broadcasting Standards Commission and Independent Television Commission found that a fifth of children aged between 4 & 15 were still watching television after the 9pm watershed and that the average child watched television for 2hrs 23minutes a day.

## 7. TV role models for Children

- A gang of violent ‘car jackers’ was jailed last year. The court was told that they found heroes in films such as ‘The Untouchables’ shown on ITV in June 2002 and ‘Scar Face’ shown on BBC2 in February 2001.
- Two six-year olds knocked a cyclist off his bike in Manchester by ramming a broom handle through the spokes of his front wheel. He was nearly killed. The cyclist broke several bones and had to have surgery. The attack happened just one day after Granada screened the thriller “For your eyes only” in which a ski stick was put through the front wheel of a motor cyclist.
- In 1995, The Royal Society for the Prevention of Accidents published the results of a survey involving 91 head teachers of primary schools. 91% confirmed there was a link between television programmes and aggressive behaviour in schools. 79% said there had been incidents of injuries linked to copy-cat play. In view of the kind of aggressive behaviour exhibited, 52% mentioned the television programme *Power Rangers* by name.

## 8. TV brainwashing of Children

- An 11 year old Portsmouth boy, who seriously sexually assaulted a 4 year old girl next door, had been allowed, from the age of 7 to watch ‘adult’ films on Sky.
- A teachers’ survey produced by the Professional Association of Teachers, 1994, stated, “A six year old woke up after 11.30 p.m., switched on her television and watched an “educational” programme on explicit sex. This only came to light after ‘suggestive behaviour’ in the classroom with other children... A junior child, exhibit a great deal of violent behaviour, told staff that he sneaked down after his mother went to bed and watched pornographic movies with his dad. There are frequent reports of children watching television until midnight.”

## **8. Pre-watershed TV influences on Children**

In addition to chat shows such as *The Jerry Springer Show* where children are introduced to a variety of sexual problems faced by adults, the Television industry has used 'Soaps' to still further influence the young. *Home & Away* included a brutal date rape scene in one of its episodes; *Neighbours* showed teenagers hunting for condoms before going to bed; *Eastenders* freely featured rape, domestic violence and homosexual kissing; *Casualty* featured a woman collapsed with a haemorrhage as a result of an abortion; *The Bill* featured child prostitution, including a shot of a man handing money to a 14 year old girl; *Brookside* featured a father who raped his daughter and was then poisoned and stabbed, and then buried under the patio and has also featured incest.

## **10. Harm to children dismissed**

In 2002, Dawn Airey, then Chief Executive of Channel 5, in response to a complaint about a sex programme seen by children, said "While I would not want children to watch it, I would hope that parental control does still apply and is exercised, although there will be occasions when children want to watch adult material can access it on most of the free-to-air channels. I do not condone it, but equally I am providing a broad service for children and adults alike."

## **APPENDIX B: Pornography and sleaze**

### **1. Promotion of pornography on television**

There appears to be a committed policy adopted by many television companies, to put maximum emphasis on sexual themes, irrespective of the social consequences of their actions and of the fact that thousands of children will watch their material.

- ‘Bravo’, part of the British-based Telewest Company has commissioned a ten-episode programme based on pornography. They have appointed one of the world’s leading producers of pornography – the Private media Group – and their press release boasts “all reality shows are trying to have elements of sex in them but our show is the real thing”. Inspired by Channel 4’s ‘Big Brother’, renowned for its lewdness, it features members of the public and female pornographic stars producing their own pornographic film. The men will be judged on their ability to perform sexually with the women.
- A joint study was published last year by the BSC, the ITC and BBC revealing that programmes including sex scenes accounted for 14% of the 800 shows monitored in the study – an increase from 6% five years earlier. Sex scenes on television more than trebled over the last five years. The number of scenes involving depictions of sexual intercourse on terrestrial TV has risen from 26 in 1997 to 80 last year.
- Last year, Channel 4 showed on 21<sup>st</sup> October a woman, her boyfriend and her mother are chatting about their experiences of acting in pornographic videos. “I heard you thoroughly enjoyed it” says the daughter to her mother roguishly. The mother said “I always knew that this what she’d do even when she was a young girl”.
- Sky 1 proposed to launch ‘Generation Sex’ in January this year featuring mothers and daughters going on separate dates with the same man who then chooses between them and explains his choice. They also planned do the same with men putting fathers in competition with their sons for a woman in her 30s. The producing company ‘Talk Back’ placed advertisements for ‘contestants’ reading “have you ever had the hots for your daughter’s boyfriend?”, “has your mum ever tried to get her hands on your man?”; “have your ever fancied your mum’s cute younger boyfriend?” A spokesman for ‘Talk Back’ said the competitiveness “would make great television”. The spokesman said “This is not as unacceptable as it once was, particularly after the latest trend of Hollywood actresses who have been linked with ‘toy boys’”.

### **2. Abusing Children on television**

- In a programme broadcast by Channel 4 on 15<sup>th</sup> October 2003 two teenagers were shown having sex under a duvet in ‘Teen Big Brother : The Experiment’. Channel 4 endeavoured to suggest that this was an educational programme and Heather Rabbatts, Managing Director of 4 Learning said “If Channel 4 is to make a difference in its educational output we needed to find new formats

that speak to and connect with the 14-19 generation”. Channel 4 has said the material was justified because it examined “citizenship, leadership status, living and learning together”. However, an Endemol spokesman admitted “What is being broadcast this week is making no claim to be an educational programme. It has been substantially re-edited for prime-time television”. The day after the event, Miss Dyer, a barmaid from Suffolk, was given the morning-after pill after admitting that they had not used protection.

- Seven years ago, Meridian television broadcast a program featuring a 13-year-old actress playing in scenes of incest, rape, and prostitution. She was shown acting out a lesbian relationship with her screen mother, plying the trade of a prostitute soliciting on the streets, acting as a child being raped, and also as a child being sexually examined. An Early Day motion was tabled in the House of Commons, urging the Government to take steps to protect vulnerable school children from being exploited, abused, and emotionally damaged in this manner. Complaints by the viewing public were dismissed.

## **APPENDIX C: Violence and bad language**

### **1. Ignoring the will of the people**

Over many years, the television industry has consistently ignored the will of the overwhelming majority of people in the United Kingdom, who are concerned about violence on television. In insisting on maintaining a diet of extreme violence, program producers are out of line with public opinion.

- Opinion Research business conducted a national opinion poll survey in 1996. 61% felt that freedom of expression had gone too far. In answer to the question, “Do you think the current safeguards to protect children from seeing violence and sex in the media, either through TV or video are too little, too much or about right?”, 68% said too little.
- A MORI poll conducted for BBC2’s *The Late Show* in 1994 revealed that two-thirds of the public believed that violence on television is directly linked to anti-social behaviour among children. 66% agreed that watching violence was likely to make children act violently and 76% felt that watching violence made children more likely to accept violence in real life
- The Independent Broadcasting Authority commissioned research in which 60% agreed that too many programmes on television contain violence.
- In 1994, The TV Times reported their special survey in which 59% of parents stated they believed that TV violence encourages criminal behaviour and that 45% of children confused fact with fiction on TV.

## **APPENDIX D: Religion**

### **1. Denigrating Christ on Television**

Television companies appear to encourage the abuse of the sacred name of Jesus Christ, in the full knowledge that this causes deep hurt to believers. They would not, of course, dare to treat the names Allah and Muhammed in the same way, and this is indicative of their double standards.

- In its comedy programme ‘Born Sloppy’ Channel Four presented a mock popularity contest between Jesus and Father Christmas. A noisy audience was encouraged to cat call and shout in favour or against the ‘contestants’. Jibes were deliberately included to ridicule Jesus with the compere shouting such warnings to Jesus as “No miracles from you!” The sketch ended with Jesus and Father Christmas in a boxing match. Following this programme there was a Christmas edition of South Park in which the cartoon figures made a video Christmas card. The script included the expletive “Oh Jesus Christ” and throwaway phrases such as “Jesus sucks”, “A lot of people don’t believe in the Jesus thing” and references to “I’m the light of the world stuff”. Channel Four transmitted these programmes at 10.40pm and 11.30pm on Friday 20<sup>th</sup> December 2002.
- At Christmas 2002, BBC1 broadcast a documentary which questioned just about every tenet of the Christmas story. The programme about the Virgin Mary, suggests that she was probably a 13 year old when she gave birth and considers the possibility she became pregnant through being raped by a Roman soldier.
- Easter week is frequently the time for features questioning the life and resurrection of Christ. On Christmas Day, 1998, the quota of ‘adult’ viewing was deliberately increased with the transmissions of films such as *The Omen* and *The Godfather*. Significantly, BBC again failed to schedule a Christian act of worship on Christmas Day.

### **2. Bias against Christian Artists**

- The outstanding Christian British band *Delirious* has sold more albums in America than Robbie Williams, but BBC Radio One continues to refuse to give them airtime.

### **3. Bias against Biblical narratives**

- BBC 1, last year, broadcast a program suggesting that the apostle Paul’s conversion was caused by an epileptic fit or a freak lightning bolt. Leading theologian, Tom Wright, said “there is no shred of evidence for the claims”. Two years previously, the BBC’s “Son of God” documentary, presented Christ as a politically correct social worker.

#### **4. Deliberate ridicule of the sacrament of Holy Communion**

- BBC Radio 4's *Loose Ends* programme compered by Ned Sherrin, ridiculed and made fun of the sacrament of Holy Communion, and Jesus the Lamb of God. The precise words of a poem broadcast were "*the bread was dry and I guessed that He had been dead for a while and although I did not voice my opinion, I thought a drop of mint sauce would probably have brought out the flavour*". The speaker further abused Christ, "*I learned that not only had the Lamb of God been completely inedible, but He had not even come from New Zealand.*" The BBC refused to apologise for this.

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*October 2004*