

**LGB Alliance**  
**The BBC's Editorial Guidelines Consultation**  
**18 December 2024**

LGB Alliance welcomes the opportunity to respond to this Consultation on the draft BBC Editorial Guidelines. Guidelines do not exist in a vacuum. The social fabric in which they are applied is constantly changing. We have written to the BBC on a number of occasions to raise issues relating to what we regard as editorial inaccuracies, omissions, and bias. In this submission we will explain the ways in which we believe the Editorial Guidelines need to be updated to take account of these contextual factors and to prevent the shortcomings we have identified.

**Our Interest**

LGB Alliance is a charity that represents the interests of a rapidly growing number of lesbian, gay and bisexual people who have grave concerns about the loss of our rights, specifically in relation to moves to replace, in law and elsewhere, the category of “sex” with “gender identity”, “gender expression” or “sex characteristics”.

We are long-time gay and lesbian activists who have fought for the rights of people with same-sex sexual orientation. These hard-won rights are now under serious threat. We maintain that the BBC's skewed reporting bears some responsibility here. In our correspondence with you, we have on multiple occasions drawn your attention to bias, omissions, and inaccuracies in the BBC's reporting on the interests of people with same-sex sexual orientation. Given the emphasis on accuracy, impartiality and fair representation of views in the Guidelines, this is a strange state of affairs. So how can the Guidelines be amended to improve matters?

In the draft Editorial Guidelines (section 1.2 Editorial Values), you say:

*“The BBC operates in the public interest – reporting stories of significance to audiences and holding power to account. In its journalism in particular, the BBC seeks to establish the truth and use the highest reporting standards to provide coverage that is fair and accurate. The BBC's specialist expertise provides professional judgement and clear analysis.”*

This is an excellent aspiration. Our response to this Consultation takes these BBC editorial values as its starting point. We have considered whether the draft Editorial Guidelines provide sufficient guidance when it comes to reporting on highly controversial issues relating to sex and gender, and on LGB people in particular, which have become more and more polarised on social media and in the public arena in recent years.

We have addressed the following questions:

**1) Are the draft Guidelines clear and straightforward?**

We believe they are formulated too broadly, with insufficient detail in the context of today's polarised debate on sex and gender. In this and other highly controversial areas, the Guidelines should be more pointed and should include examples.

**2) Do they set out appropriate editorial standards for those making BBC programmes and content?**

No. They fail to give enough guidance to staff. Besides the polarised context of public debate, there is also the context of the BBC itself. BBC staff holding gender-critical views tell us they are unable to express these views at the BBC. They speak to each other in secret. Several have felt obliged to leave the corporation because of this. It will be clear that "impartiality" takes on a different meaning – and is harder to achieve – in this organisational context. In addition, the Guidelines fall short on guidance regarding ethical reporting. Again, examples are crucial here.

In Section 1: The BBC'S Editorial Standards – Essential Information, you say:

*"The BBC is impartial, seeking to reflect the views and experiences of audiences, so that its output as a whole includes a breadth and diversity of opinion, and no significant strand of thought is under-represented or omitted."*

Given the above contextual factors, this paragraph should be expanded. A sentence should be added to the effect that: "This is especially important in highly polarised areas such as those relating to sexual orientation and gender identity" – with the addition of examples for clarification. While battles on sex and gender are being fought out in the courts – in over thirty court cases up to and including the Supreme Court – the BBC's persistent bias in these areas is inexcusable. The views and experiences of lesbians who understand that homosexuality is same-sex sexual orientation, rather than an attraction to a nebulous gender identity, commanded great interest among the justices of the UK Supreme Court, but are scarcely represented by the BBC. A belief in the importance of biological reality is inarguably a "significant strand of thought" and, we would suggest, is a majority held opinion. Indeed, it should be noted that in most of the court cases mentioned above, the "gender critical" view has prevailed. This bias should be identified and examples given to provide more direction in the Guidelines.

There is too little focus in the Guidelines of ethical issues. Clearly, providing equal time to those advocating the need for vaccination and those suggesting that vaccination is harmful would be unethical. There is an understanding that vaccination is largely beneficial and it would be unethical to give much air time to its opponents. This issue requires further attention in the Guidelines. We have watched with deep concern as childhood "transition" has been celebrated, even in children's programmes, while few programmes have ever focused on the associated harms and controversies. This is not responsible reporting but activism. The Guidelines should include a paragraph, with examples, expressly forbidding activism.

## Accurate language

The Guidelines should reflect an awareness that lesbians, gay men and bisexuals differ in their use of language:

The Guidelines state that the BBC aims *“To provide impartial news and information to help people understand and engage with the world around them.”*

Again, the Guidelines should include examples. Otherwise, errors are made such as this one: A story headlined, “Ghana’s LGBT terror: we live in fear of snitches” goes on to say that “A new bill will impose a jail term of up to three years for simply identifying as LGBTQ+” The story uses LGBTQ+ and LGBT interchangeably throughout, without clarifying what the acronym represents. Given that the bill was a crackdown on homosexuality, and had nothing to do with “gender identities”, it would have been more accurate to write “homosexuals” or “gay men and lesbians”.

Similarly, lazy language like a story headlined, “Spain’s LGBT Matador” could be avoided if the Guidelines gave examples of accurate reporting in this area. The matador was not lesbian, bisexual or transgender – he was gay. Why not simply say so?

<https://www.bbc.co.uk/news/world-europe-68226508>

We would therefore welcome a paragraph in your Guidelines advising staff to make these distinctions clear. Lesbians, gay men and bisexuals would feel better represented and be better informed if stories said, “a lesbian”, “some gay men” or “a trans woman”. Aggregate terms such as LGBTQ+ obscure meaning and lead to factual inaccuracies in your reporting.

## Bias

In Section 2: Impartiality you say, *“There may be occasions when the omission of views or other material could jeopardise impartiality or accuracy. There is no view on any subject which must be excluded as a matter of principle; content producers should make reasoned decisions and apply consistent editorial judgement about whether to include or omit such perspectives.”*

These are apparently clear guidelines, and yet gender critical perspectives from LGB spokespeople are consistently excluded. We believe that these obvious breaches of stated principles mean that the Guidelines must address sex and gender issues in more detail, with examples, than less controversial subjects. That includes Guidelines on the kinds of guests to be invited to contribute their views. Controversial figures who subscribe to queer theory, including extreme gender identity ideology, such as Peter Tatchell, are repeatedly invited to speak on behalf of LGB people. There seems little understanding at the BBC that Mr Tatchell’s views are considered extreme – and indeed rejected – by many lesbians, gay men and bisexuals and no effort is made to provide balance by promoting LGB spokespeople who oppose queer theory. Those who understand that sexual orientation is based on sex, not subjective “gender”, are not a fringe minority. Phrases such as “reasoned decisions” and “consistent editorial judgement” are far too vague and subjective for areas of controversy. Again, specific Guidelines are needed, with examples.

## Omission

*In Section 2: Impartiality you say, “Particular care must be taken to achieve due impartiality when a ‘controversial subject’ may be considered to be a major matter. ‘Major matters’ are generally matters of current public policy or political or industrial controversy that are of national or international importance, or of a similar significance within a smaller coverage area.”*

Since the vast majority of stories of considerable significance to lesbians, gay men and bisexuals, which run counter to gender identity ideology, have been unreported by the BBC, as documented in our many letters to you, this section clearly needs to be clarified.

While all the court cases and other major stories that have captured the attention of lesbians, gay men and bisexuals remain unreported by the BBC, we see, in contrast, a large volume of stories featuring drag queens – so much so as to make the BBC the object of ridicule. In an article of 10 May 2024 in Spiked, we read that not only is iPlayer full of a range of drag shows such as RuPaul’s Drag Race UK, Canada’s Drag Race, RuPaul’s Drag Race Down Under, Jamie: Drag Queen at 16 and God Shave the Queens, but “The drag obsession has even infected the BBC’s news output. Last month, the BBC News website published seven articles about drag artists.” In July this year, the BBC published two features about how the cost-of-living crisis has affected six ordinary people. All six of the people featured were cross-dressing men. This is not just peculiar but symptomatic of poor editorial leadership. In contrast, there are very few stories referencing lesbians, gay men or bisexuals. The Guidelines should warn against such unbalanced coverage.

As noted above, the BBC has also broadcast a plethora of programmes, including on children’s television, celebrating child “gender transition”. This has generated profound concern among professionals who have finally succeeded, after years of research and publications – and in spite of the BBC’s neglect – in drawing attention to the harms of puberty blockers and cross-sex hormones. This is an ethical issue which requires more emphasis in the Guidelines.

*In Section 2: Impartiality, you say, “The BBC needs to be able to portray and include the full range of interests and views across all the audiences it serves. Those views and interests should be reflected fairly and accurately, and the BBC should not be seen to be promoting or revealing opinions of its own.”*

The above bias – major court cases largely ignored, while drag queens and child “transition” are celebrated – makes it crystal clear that these provisions on impartiality are either not understood or simply ignored. Again, the only way to correct these obvious biases is to include more specific guidelines in the fraught area of sex and gender, with carefully-curated examples.

### 3) Do they sufficiently reflect the changes in the media landscape since the last review in 2019? – NO

In 2022, the Sir Lenny Henry Centre for Media Diversity published a report that examined the use of the term BAME in broadcast media. In that document he argued the aggregate term should be dropped.

The report said,

*“... the term has garnered significant criticism from the very people it seeks to describe. With some people... seeing it as an insult that should never be used. A major concern, apparent in recent public responses to BAME, is that it homogenises culturally distinct social groups. This is significant because it is tied to a wider and long-standing struggle for cultural representation that these diverse communities have long sought to achieve within the creative sector in the UK. If one of the aims of media organisations is to increase diversity and inclusion and improve cultural representation, a homogenising term could have the opposite effect. This is particularly apparent if it is used in the singular, effectively replacing a person’s own self-described racial identity.*

***Use of the term has also fed into concerns by some that it has been used cynically by organisations to hide the lack of representation and discrimination experienced by particular racial groups, as their problems are ‘averaged out’ through incorporation into the broader group.”***

Your use of the aggregate term LGBTQ+ has the same effect on lesbians, gay men and bisexuals as BAME does on your culturally distinct audiences. It also does the same damage to the individuals it purports to serve. A note to this effect should be incorporated into your Guidelines.

#### **In conclusion**

Whilst the overarching aspirations of impartiality, accuracy, and representation of diverse views are broadly inscribed in the Guidelines, they are too general and include too little detail to serve well in today’s polarised media landscape, and take insufficient account of the social and organisational context. We advise that in the area of sex and gender in particular, to cater for the diverse interests of your lesbian, gay and bisexual viewers, listeners and readers, these Guidelines should be updated and expanded, and should include examples that will help to correct the significant shortcomings that we have identified.

Once the Guidelines have been updated to reflect the needs of today’s society and media landscape, we look forward to a future Consultation on the way in which they are being implemented.