

**Screen England response to
OFCOM's discussion paper**

**A new approach to public service content
in the digital media age**

Screen England response to OFCOM's PSP discussion paper

Screen England is an active partnership of the nine Regional Screen Agencies. The RSA's are funded by lottery, via the UK Film Council, and Regional Development Agency support combined with European Regional Development Funding and other partnership sources.

The RSAs exist to promote and build a vibrant and sustainable moving image industry in the English Regions, which is rooted in an accessible and diverse screen culture, maximises the opportunities for the development of regional talent, celebrates cultural identity, encourages the sector's growing importance to a regional economy and promotes world-class creativity within it.

We welcome OFCOM's discussion paper as a timely and important driver in the PSB debate.

We commend OFCOM on the impressive work done on this subject since the last paper.

Screen England is a supportive champion of the ideas in the discussion document.

Our perspective

Summary

- **Most RSAs are now converged agencies working across the range of moving image sectors and platforms.**
- **RSAs commission projects that meet the needs of people and not just markets.**
- **To be successful the PSP must occupy a challenging and complex space requiring wide partnerships and creation of projects with social and civic impact.**

- **RSAs have a range of experience that may be useful to the PSP.**

We feel we are in a strong position to comment as Screen England is already a country wide partnership commissioning content of commercial, social and civic value for a range of platforms and distribution models.

Each year Screen England invests over £20m in content production, training, locations, business development, archives, education, festivals and cinemas.

Our investments are complex in form ranging from straight grants, to soft loans to formal FSA regulated funds.

Most of the Regional Screen Agencies are converged agencies already, working with film, television, games, interactive media, multiple platforms and some are beginning to work more closely with the theatre and music sectors.

Uniquely our commissioning models sit in front of a whole set of complex aims and objectives, only some of which are commercial. This means we are better able to commission projects that meet the needs of people and not just markets.

Screen England work collectively with over 750 partners at regional, national and international levels from the Government, UKFC, RDAs, Broadcasters, Telecoms partners, Sector Skills Councils, Business Links, Regional Cultural Consortiums, Local Authorities, Arts Council England, media trade bodies, other regional cultural and commercial agencies, communities and companies. In 2005 Screen England worked with 76 different language communities.

The Regional Screen Agency model successfully joins up the regional with the national, the cultural with the economic; regional delivery hits national strategy targets and the regional specificity translates national policy into successful local activity.

We believe that for the PSP to be successful it needs to occupy a complex and challenging space –

- It must marry national strategy with local needs
- It must lead national debate with government and policy makers but link with regional policy and partnerships.
- It must have a local commissioning structure driven by both national strategy and local need.
- It must fulfil national aims but without becoming overly dictatorial on the type of content commissioned.
- It must be both a bureaucracy but remain fleet of foot.
- It must not just respond to need, it must make things happen.
- It must generate fast, simple, local commissioning unfettered by a centralised approach, but must meet national targets and engage with national policy.

This space is one that the Regional Screen Agencies have occupied for the last few years. Whilst we do not claim to be experts in how to do it, we do claim to be experienced in some of the things that work and some that don't.

To give better insight into how this is done we recommend 'The Big Picture' John Holden DEMOS 'The Regional Screen Agencies, building community, identity and enterprise.'

<http://www.demos.co.uk/publications/thebigpicture>

We offer two quotes from the report –

“When the Minister for Culture speaks of building a “culture of participation”, and “ensuring that the framework for our investment supports bottom-up innovation rather than top-down dictation”, there are few better examples than the RSAs.”

“RSAs do not claim to own or control cultural products in the moving image: rather, they help to bring them into being, and provide a point of mediation with government, policy-makers and the world beyond the screen sector. In this environment, they have adopted a logic of intervention that defies the simplicity of linear input-output, funder-funded, hierarchical relationships. The cumulative value of the RSAs cannot be adequately described at the bottom of a balance sheet.”

What follows is from our experience, good and bad.

The appropriate nature of intervention in the digital media age, and the balance between TV and non-TV forms of PSC distribution.

Summary

- **Public Service Content and its delivery do need to be reinvented in the digital age.**
- **Public sector intervention is essential in order to achieve this.**
- **The PSP needs to look beyond a devolved commissioning structure toward a wide and deep partnership delivery structure that builds skills and experience as well as creating content.**
- **The PSP should be a new entity in order to benefit from the energy and original thinking that this will bring.**
- **The distribution system for the PSP must be much wider than television and though some existing broadcasters have made valuable contributions to interactive content their commissioning processes and aims are not a good fit with the space a PSP must occupy.**

In our experience it is essential for the public sector to intervene in the market in order to generate media content with real cultural, social and civic value.

To generate real value the impact must feel personal and therefore local. National centralised models of commissioning struggle to deliver content that feels personal and local.

A national to local network

One of the strengths of the PSP proposal is that it is able to be both national and regional and even local. For this to work the content must be created and used by a broad range of organisations and people.

This will require very active strategies to drive both participation by a wide usership and continually improving content creation skills across the country.

Those of us operating in regions that traditionally have had small media sectors that have been driven by regional television recognise this challenge well, the challenge has really been one of reinvention.

This means that the PSP must look beyond a devolved commissioning structure and look toward partnerships that focus on building skills, building experience, building networks and building contacts for people.

Our bigger successes in developing parts of England that lack infrastructure and skills has come about by building locally but also by importing talent. Creative Partnerships and First Light have also used mentoring models successfully to help people create content they would not have come close to doing on their own, but at the same time leaving them with the skills to continue to do so.

Partnership working has been successful where partners share common goals. RSAs collectively produce nearly 100 short films every year and combine on training programmes for the directors of the short films. Some highly successful partnerships have been formed with broadcasters investing in regional production funds alongside RSAs. These types of partnerships have resulted in the discovery of new talent and new voices producing content with national and international potential.

We therefore recommend that the PSP examine not just a content creation strategy but a much wider partnership strategy that helps the nation to get excited about creating its own content and participating in content created by other groups and individuals.

This will require a network of experts running a continuous range of workshops and discussions around the country. A sort of networked, rolling content boot camp that supports, connects and empowers.

Like most of our proposals, we think this could begin now and we offer ourselves as key partners and part funders.

Going beyond current provision

We are excited by the thought of new activity in the media space and content that starts to do more than entertain, educate and inform. For the last few years our media literacy strategies have been attempting to create *access, understanding and participation*.

Screen England feels strongly that the PSP should be a new organisation and we hope the PSP will see Screen England as both a key partner and a useful model for some areas of activity.

New organisations bring their own enthusiasm, energy, focus, commitment, ideas and ways of operating. These will all be essential for the PSPs success.

Historically, first the ISPs then the broadcasters then the telecoms companies were seen as champions of interactive content, all of them have failed to become worthy champions. Mainly because their own businesses are driven by user numbers, by take up, not by depth of use or value to the public beyond their main offering.

The BBC and Channel 4 have made significant contributions in the interactive space but are still held back by their culture, their centralised structures and their need to be broadcasters.

PSC should be distributed on whatever platform the user wants to access it on and in whatever form they require it. This makes a TV only approach very limited.

A TV only approach is also limited by the commissioning structure that feeds it.

Existing organisations do not drive towards a diversity of ideas and partners but the opposite - they dictate the style, tone, format and content of the programming they commission. Most commissioners are forced to be arbitrators of taste not free thinkers encouraging experiment.

The television commissioning and distribution process presents 'finished' programmes to an audience. It will increasingly commission interactive elements but these will always tend to be secondary to the main TV based programming, unless they involve text voting etc. The PSP model needs to be more concerned with creating projects in partnership with users.

Consequently, the networks utilised by the PSP must be much looser, wider and more disruptive than the networks used by existing organisations in the same space.

Though ISPs, broadcasters and telecoms companies are essential and central partners to the PSP, they are not it. A new, active, entrepreneurial, energetic agency is required and a much wider distribution system than traditional television.

The potential role of the PSP and its creative remit

Summary

- **The PSP must be an aggregator, a commissioner, a trainer and a facilitator as well as a publisher.**
- **It must find ways to spread information, learning, thinking and experience continually and widely.**

An aggregator

There is a very wide range and depth of content with potential public value already in existence. In archives, libraries, attics, on servers, within other existing programmes and channels.

The PSP could examine ways of accessing this material and making it searchable so it can be used and reused in other forms of PSC.

A commissioner

There is a very wide range of ideas and communities that coalesce around places, problems, issues and interests.

The PSP should find and attract these ideas and communities and help them find an appropriate voice or debating space and form.

It should commission tools that create ways of holding conversations between individuals, groups and institutions, ways of debating and participating.

It should commission content and services that expand the art galleries, the museums, the cinemas and the libraries into a broadcast and web space where people can participate in work, collections, ideas, thinking and points of view.

It should commission interactive content, new ways of playing games, new stories that are told in new ways by different individuals and groups, new performances that take place on a wide variety of platforms and stages real and virtual.

It should commission exciting virtual environments and spaces that only come alive when users populate them and use them.

It should commission content that bridges disciplines, tools and stories that allow architects to work with gamers, theatre to work with film, musicians to work with television producers, writers to work with dancers, archivists to work with graphic artists.

It should also commission experiments, partner in events, participate in activity, hold discussions and take part.

A trainer

The PSP needs to create a myriad of ways that people can learn about its propositions and learn how to participate in them by contributing and creating their own content.

It needs to build skill levels but also needs to build experience, knowledge and understanding of the new PSP world.

To fully participate in the world of PSC people, communities and institutions must understand and value it. The PSP will have to be a catalyst for this.

A facilitator

The PSP and its network must spend time and resource joining people, communities and institutions together. It must introduce ideas, people and companies to each other.

It must value loose networks and be comfortable with disruptive networks, it must find ways to spread information, learning, thinking and experiences

continually and widely. In short, it is as much a broker and facilitator as it is a publisher.

The operating model – in particular, the approach to rights management

Summary

- **Commissioning for social and civic impact is challenging.**
- **Versatile commissioning models are required.**
- **Diverse, proactive commissioning networks will need to be built.**
- **It can be challenging to create incentives when commissioning with public money.**
- **It is more than commissioning and publishing it is also facilitating and brokering.**
- **Commissioners must have wide experience and patience and must be able to guide and inspire.**
- **A mixed approach to rights management will be required.**

Function

Screen England invests in over 1,000 projects a year. It uses a range of tools to do this from simple non recoupable grant funding to formal content investment with complex recoupment paths.

We invest to create outputs around everything from commercial return to job creation to social impact and civic pride. We may invest in a content project in order to train people and we may invest in a production project to drive tourism.

Commissioning work where much of the outcome is Public Value is complex and challenging when the evidence for success is not audience numbers.

We are also sometimes commissioning work where the audience is unknown or when the user community is yet to form.

This requires commissioners who are capable of being as interested in the process as in the end result, and sometimes it requires more of an interest in the content creators than in the potential users.

Of course we are always trying to commission content that is useful, but its use, that is the outcomes it generates can vary widely.

The PSP will require versatile commissioning models, groups and individuals who are at home with linear television, interactive content, social interactivity, gaming, narrative and performance. A silo approach will not work, a genuine 360 degree model requires a system that is informed on all forms and values them all equally.

Screen England would like to offer its services and some of its budget to experiment with commissioning interactive content in line with a PSP remit.

The challenge of quality in the PSC Commissioning Process

Commissioning varied content of high quality from a diverse range of creators across the country with public money presents a set of challenges.

Incentive

The great challenge with commissioning with public funds is that public money tends to be invested at the beginning of a project and further payment milestones are not based on quality merely delivery of items. This is the opposite to a pure private sector model where money only really comes in when the product has reached the market and is sold. It must be of high quality to be fit for purpose.

Public investment is often designed to create outputs around things like 'jobs created and sustained'. This is a good regeneration tool but does little to focus content creators on generating quality.

This creates some real challenges around incentives to drive quality and even full completion.

In the traditional television market an independent producer's only area of activity is television production and their next commission relies on the quality of their last. There is an inbuilt incentive to produce quality work on time and on budget.

When commissioning from a wider sector as Screen England often does the lack of these in built incentives is challenging. Public value projects commissioned with public money are often seen as 'non core' and can take second place to commercial projects within the producing organisation. At worst, with smaller companies, the money can be absorbed into overheads to bridge gaps in cash flow leaving the company with far less money and no time to produce the original commission. This has obvious effects on the final quality of the project if it is delivered at all.

Quality

The PSP will face a challenge in how to construct a commissioning process that drives quality with producing entities who are not high level independent production companies already. These individuals, communities and organisations require a lot more advice, guidance and patience than many commissioning processes allow for.

The process also needs to accommodate active support for content producers to ensure they are building their skills, experience, networks and contacts. A process must be in place that can track the experience of those it is commissioning from, so it knows the level of projects that they are capable of undertaking.

Content producers and users in the interactive media space have a habit of going their own way, that's the point. Commissioners and the commissioning process must recognise this.

A commissioning process is required that can escalate local projects to national ones and that can stimulate local uptake of national projects. A fundamental change in the commissioning model will be needed to ensure that the role of broker and facilitator are incorporated into the job description of the commissioner. The commissioner's role will therefore not only be about receiving the final content but will also encompass an on-going responsibility for the use and development of that content.

It is therefore essential to allow room for a wide range of partnership discussions as part of the process.

Commissioning Process

Many projects in the interactive social space are empty shells until they are populated and only generate context and meaning once users have taken possession of them. This presents its own set of challenges to commissioners and the commissioning processes. It requires more R&D that goes further, a broad active research function and a process that allows for further funding to come in later in the process. The running costs of a project can end up much more than the costs of creating it in the first place. This presents its own challenges for future budget projections for the PSP.

There are the normal challenges inherent in devolving commissioning as the process has to work without central control. Add to this the complexity of delivering quality without commercial imperative, working with many partners including inexperienced producers and having to further support projects that have already been funded and the challenges to the commissioning process are clear.

It perhaps hardly needs saying that in this context it is vital to use a wide range of commissioners who are proactive and have both experience and patience and who can guide and inspire.

Rights

An exciting prospect is that the PSP could become the Channel 4 for the interactive content creators. It will be challenging to have this effect if the content creators have no way of generating further value from their work as all their assets are in the public realm and rights free.

It is likely that the price paid for content will have to be high as the only form of revenue generation will be a sale to the PSP.

There is a danger that the PSP is seen as a worthy commissioner to work for rather than one that attracts the best people with the best ideas.

With no prospect of other revenues, projects and companies will not attract private investment, this will also limit the partnerships available to the PSP on content.

Private investment can be important to create sustainability, generate focus and build quality.

A mixed approach to rights would be the most successful but the most complex and challenging.

The scale of funding required.

Summary

- **Screen England offers some useful benchmarks but is unable at this early stage to comment on the scale of funding.**

We do not feel the proposition is clear enough yet to offer views on a budget, but we offer the following as a contribution to the discussion on benchmarks.

As a useful guide, each of the RSAs employs roughly 12 to 25 people that provide the full commissioning, support, training, networking, funding and

facilitating functions. The cost ranges between £500K to £1m per agency to provide this wide range of schemes and services.

The remit of the PSP would be much wider than the RSAs and centralised technology, legal, finance etc would be required. Some of the successes of the RSAs are because they are independent companies able to adapt to local need and responsible for their own investment and expenditure decisions. We recommend this structural independence.

It is also likely that the PSP will require a network of commissioners and assessors out in the field who will need paying and expenses met.

Each year, Screen England receives between 30,000 and 40,000 general enquiries, processes over 3,000 applications and funds between 1,000 and 2,000 projects. More accurate figures are available if required.

Obviously there is a considerable amount of content investment already in place in the country. It is hard to say how much of this could be aligned as match for the PSP content funding.

Screen England
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For further information contact –
Tom Harvey
Northern Film & Media
Central Square
Forth Street
Newcastle upon Tyne
NE1 3PJ
Tel 0191 269 9200