

## **Ofcom C4 response**

### **From the Campaign for Press and Broadcasting Freedom**

#### **Response to Ofcom's Review of Channel 4 Corporation's delivery of its media content duties (2010-2013)**

**February 2015**

#### **About the CPBF**

The Campaign for Press and Broadcasting Freedom is an independent organisation which has campaigned for more accountable, open and diverse media since its creation in 1979. Issues around which it has worked include, the statutory Right of Reply, ownership and control in the media, the nature of the internet and computer based communications, representation within the media of the diversity of groups in society, the accountability of regulator structures, the need for independent alternative media and the importance of sustaining and developing public service media.

#### **Introduction**

This document reviews the Channel 4 Corporation's performance between 2010 and 2013 in the light of duties laid down by the Digital Economy Act of 2010. Ofcom has posed a single question for consultation: 'Do you agree with Ofcom's provisional findings in its Review of C4C's delivery of its media content duties?'

This question was also posed by Ofcom's document, *Public Service Content in a Connected Society: Ofcom's third review of public service broadcasting*, which included a summary of the information in the report on C4C. The Campaign has submitted a response to the *Public Service Content* review and in that response our reply to Question 7 on C4C is relevant.

However, we want to take this opportunity to expand on the points we made there, because we want to stress the continuing importance of C4C in the overall media ecology. When Channel 4 was set up in 1982 it had a brief to innovate and to appeal to tastes and interests not catered for by the other channels. Its current remit echoes those commitments. In the early days the Channel was protected from direct competition from commercial rivals, as it did not directly sell its own advertising. It was therefore able to broadcast a range of programmes which would appeal to minority tastes and were not targeted at the largest possible audience. We are concerned that this delivery of innovative programmes and programmes for groups not otherwise catered for has become progressively more difficult, as competition for advertising has become more intense.

C4C is different from fully commercial channels in several ways: it is a publicly owned Corporation with special obligations; it is a publisher, not a producer, and so has a special relationship with independent producers.

Bearing this special status in mind we would make several specific points:

1. *Commissioning*: We are concerned about the consolidation in the independent production sector (1.5), especially the rise of the 'super-indies' -very large independent companies, many of them now owned by major American groups. C4C

should ensure that it commissions from smaller domestically based production companies giving space to new talent and supporting the UK production industry, and the domestic creative economy.

2. *Original content:* We note with concern Ofcom's finding that the volume of original content has gone down and that most original programming is to be found on the main channel, and that the audience for that channel has declined.

3. *Innovative formats:* Although Ofcom quote a range of innovative formats (*Gogglebox*, the '*Educating*' series et al) these are not the majority of C4C's programmes across its 'family' of channels. C4C too often seeks to attract audiences with programmes which verge on the exploitative (*Embarrassing Bodies* et al)

4. *Representing minorities:* similarly, programmes which deal with minority groups, such as people with disabilities, (the document quotes *The Undateables* 2.21) may sometimes be seen as a freakshow (as with the row over *Benefits Street*).

5. *Older children and young people:* We share Ofcom's concern that although C4C has a remit to provide for older children (10-14) and young people (14-19) this provision is limited -especially for the 10-14 age group. This is particularly concerning as this age group is the least catered for on all channels. We support Ofcom's request for C4C to produce a fuller strategy on this.

6. *Current affairs, documentaries and news.* Ofcom also notes a reduction in these areas. We feel that Ofcom should be stronger in its monitoring of these genres.

More importantly we argue that it would be possible to create the circumstances in which C4C was protected from direct competition with channels which are commercially owned and have fewer public service obligations, by developing a funding formula, similar to the one which enabled Channel Four to develop its unique qualities when it was originally set up.

C4C, as a publicly owned Corporation has unique features which are in danger of being eroded and should be protected.

Campaign for Press and Broadcasting Freedom  
<http://www.cpbf.org.uk/>

26 February 2015