

Ofcom's Second Public Service Broadcasting Review - Phase 2

Joint submission from

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and

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Introduction

Public service content has a moral underpinning in that it promotes the common good of society. It is key to the creation of an informed society and to educating people into become active citizens. The survival and flourishing of public service content is not just an economic or political question, rather it has implications for the kind of society we want to be. There is every indication that society still wants the benefits it offers and therefore its benefits should be available to all.

The future health of public service broadcasting depends on ensuring that:

- 1. the BBC does not become the sole provider of public service content,**
 - 2. Channel 4 is funded and is allowed to develop its role,**
 - 3. the mix of public service content available continues to provide the broadest range of programmes of wide and popular appeal to audiences, including children's programmes, religious programmes and other genres.**
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- 1. (Question 4.1) Should the BBC be the sole PSB provider?** The availability of different perspectives and approaches to public service content, including news, is vital to providing a wide range of content that will appeal to all tastes and viewpoints in the nation. Ofcom's own findings about the social composition of news audiences at different times of day and on different channels underlines this. The word 'trust' is not much mentioned in Ofcom's report, but as recent events have underlined, the public has high expectations of the integrity and credibility of public service providers. These expectations arise from the assumption that public service providers owe their first duty to the citizen and not to advertisers or any other group. On fulfilling this duty, public service providers play a crucial role in ensuring the maintenance of high standards in the delivery of information and meaning. It is therefore of the utmost importance that there are sufficient sources of public service content, both to ensure healthy competition for standards and to reach broadly the whole of the population.
 - 2. (Question 4.2) Funding.** Of the proposed models for funding PSB, the only one which appears to be able to deliver this combination of variety and trust, without too many of the attendant disadvantages, is the 'BBC + Channel 4 + limited contestable funding' model. This has the advantage that those who bid for contestable funding can be presumed to want to make a commitment to it, not reluctantly obliged to provide it. We consider it vital for the success and acceptability of this model to the public that the

contestable funding is delivered, as Ofcom has envisaged, on a long-term basis. This will also help ensure that additional funding is spent effectively.

3. **(Question 4.3) Channel 4.** The preferred funding model would place additional requirements on Channel 4 in its remit. These should include obligations to provide content across all platforms, but Channel 4 should not be the only provider obliged to do this. Otherwise the goal of reaching substantially the whole public with more than one provider of PSB will not be achieved. If Channel 4 has an extended remit, it should be provided with the necessary additional funding directly and immediately before its capacity to fulfil this new crucial role is damaged.
4. **(Question 4.4) PSB Remits for Channels 3 and 5.** If there is scope for public service obligations being placed on Channels 3 and 5, these should be meaningful. It would be untenable that a remit should include public service obligations which are, over the course of the licence, negotiated away or ignored by the licensee with apparent impunity. The example of children's programmes on ITV provides a salutary warning. Obligations that are agreed to but prove unenforceable risk bringing the system into disrepute. The obligations should be included, but should be backed by tough sanctions in the licence for ignoring them.
5. **(Question 4.5) Targeting Competitive Funding.** Competitive additional funding should be available as a priority for those programme genres that are regarded as essential to the health of a public service, but in which the market seems unwilling to invest, regarding them as "not profitable".
6. **(Question 5.1) Nations and Regions** should continue to benefit from their own regional news and this should be funded. We fully support Ofcom's findings. But this also requires a commitment to proper local production and newsgathering which has been reduced in recent times.
7. **(Question 5.2) Which model is best for the Nations and Regions?** The evolutionary model, where existing PSB providers continue their roles, has merit for delivering this solution, given the expressed preference of people in the nations and regions. But it would also be possible to provide what it offers under the BBC + Channel 4 + Competitive Funding model, if some funding was ring-fenced for news.
8. **(Question 5.3) Local Content Services.** Following the decision that the BBC's local online provision could damage local newspapers given their development into providers of online news, we do not see why some of the contestable funding could not fund remits for highly local public service provision through these websites, encouraging small scale cross-media activity.
9. **(Question 6.1) Analysis of available funding.** We are heartened to see that there is a public appetite for funding PSB beyond the BBC but equally glad to see consideration of other sources of funding. We express caution about the blanket description of 'profitable and unprofitable.' There still remains both confusion and inconsistency about how

religious output is viewed and its value to audiences, mostly around the definition of religion on TV. It extends far beyond the broadcasting of acts of worship, important though that is. Programmes about ethics, values and the 'big questions of life' all have a religious dimension to them. These programmes are commonly made or commissioned as religious output. It is not clear how wide a definition is used.

Equally, it is clear that one programme gaining an audience of around 4 million weekly is regarded as a wild success meriting an £18 million star (Friday Night with Jonathan Ross) while another with a similar audience is regarded as part of an unprofitable genre (Songs of Praise). This seems to be a striking lack of consistency.

As we have said many times before, religious programmes suffer from a lack of investment, being scheduled at unpopular times and being given relatively little prominence. It is clear that religious belief and practice is having a continuing and important influence in all aspects of life and the investment in this strand of programming should recognise their significance.

10. **(Question 6.2) Funding beyond the BBC.** We favour a mix of public subscription through, in order of preference, using gifted spectrum, a charge on industry organizations and increasing the amount of advertising that the commercial PSB channels show. An addition to the licence fee would risk causing confusion.
11. **(Question 6.3) Funding Channel 4.** Prominence on Electronic Programme Guides and cross-promotion make very good in-kind means of funding, but we re-iterate our statement in paragraph 3 that new obligations for Channel 4 require new funding and that Channel 4 needs funding urgently so that its capacity to deliver future requirements is not damaged.
12. **(Question 7.1) The short-term** Ofcom is right to identify that maintaining the purposes of public service provision in the short term is crucial to its long-term survival. Once lost it cannot easily be re-introduced, as the experience of the New Zealanders shows.

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