



Content policy
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Channel 4: Licence Reviewal

Equity is the trade union representing 36,800 performers and creative workers. Our membership includes actors and other performers working in television drama, comedy and entertainment throughout the UK. We are pleased to provide some brief comments relevant to the renewal of Channel 4's licence.

Our members are very strongly in favour of a regulatory approach to public service broadcasting that can facilitate the continuation and an expansion in the production of original drama, comedy, entertainment and children's programmes made in and about the UK.

Without regulation which aims to support UK original content production, we fear that certain genres, particularly those for niche audiences, could disappear from our screens at an increasing rate. Ofcom's objective must therefore be to seek to maintain and strengthen existing public service broadcasting commitments, so that UK audiences can continue to get high-quality original TV from a range of providers.

We acknowledge that Channel 4 is a leader among UK broadcasters in commissioning a range of high quality and original productions and that half of its commissions are long running series. We hope that Ofcom recommends that Channel 4 should continue in this vein at the conclusion of this review.

Current licence conditions

While we broadly agree with Ofcom's view that the current licence conditions remain largely appropriate to securing Channel 4's obligations in terms of independent and original productions, we believe that there is scope to raise the proposed increase in the quota for productions originating in the UK's Nations.

Out of England quota

We note that the current Out of London production quotas for Channel 4 are currently set at 35% (volume of productions), 30% (value of productions) and at just 3% for the UK Nations (Out of England quota). Channel 4's 2012 performance exceeded these quotas with 41% value and 48% volume coming from Out of London and 7% of productions coming from the UK Nations attained. We also note that Ofcom is considering a proposal to raise the Out of England quota to 9% by 2020.

For some time Equity has been calling on broadcasters to produce more content in the Nations and Regions in order to draw on the skills and talents in these areas. We believe that it is only fair that broadcasters spread their operations so that a greater proportion of production employment is spread across the UK. We therefore welcome Ofcom's proposals to increase the Out of England quota for Channel 4.

Through its *Delivering Quality First* process, the BBC has made a similar positive commitment to increase its investment in content produced in Scotland, Wales and Northern Ireland in the coming years and we believe that other broadcasters should mirror this aspiration. The BBC has committed to match its spending in the UK's Nations to the proportion of the population in Scotland and is adopting a similar approach in Wales and Northern Ireland. This will mean that the BBC will produce 17% in the UK's Nations by 2016. The BBC has also set a target for Out of London production of 50% by 2016.

Recognising the challenges faced by Channel 4 and the funding available to this broadcaster, its dependence on the independent production sector and the relatively small number of producers established in the Nations, particularly in drama, it may not be realistic to expect that Channel 4 can match the targets of the BBC in terms of productions coming from the UK Nations. However, given its performance in 2012, Channel 4 is very close to meeting the target that Ofcom is proposing to set for Out of England production by 2020. We would therefore recommend that the Out of England quota be raised to at least 9% by 2016 and that a more suitable, higher target is set for 2020 in the region of 17% for Out of England productions and 50% for Out of London productions.

In making this recommendation we are however mindful that such quotas define production origin by a proportion of the budget spent, excluding on screen talent. Consequently a programme is often labelled as coming from Scotland, Wales or Northern Ireland but in reality there are few – if any – opportunities for performers in those nations to appear in them.

Paragraph 3.108 of the consultation document stresses that 'the criteria are designed to ensure use of local resources in the making of the programme including the production base, production spend and use of production talent. These criteria support, but do not necessitate, portrayal on screen of the culture of the locality in which a qualifying programme is made.'

In our view, local casting should be a key component of regional production and this must be reflected in the Out of London/Out of England definitions used by Ofcom. Beyond this consultation we are currently working with Ofcom to explore further how this problem can be addressed.

Regional production

We note that since 2009 the percentage of Channel 4's production by value coming from certain regions, including the Midlands has declined substantially. Productions originating in the Midlands region have fallen from 7.3% in 2009 to 2.6% in 2012.

Due to a combination of factors, including cuts to the BBC's funding, our members also report that original content production is under threat in a number of regions, and in particular the Midlands, where Equity members and members of the general public have been calling for much needed investment through the Campaign for Regional Broadcasting Midlands

<http://www.crbmidlands.org.uk/>.

The Campaign is calling for the BBC primarily, but also other broadcasters, to renew their commitment to the Midlands region following a migration away from the area over several years. Given the concerns raised in this consultation document, specifically the concern that an increase in UK Nations production investment could result in less production in the English regions, we would encourage Ofcom, through this review, to make a recommendation that addresses the need for investment in production the Midlands area.

If you require any further information or clarification of any points in this submission please contact Louise McMullan, Head of the General Secretary's Department on 02076700260 or by email at lmcmullan@equity.org.uk.

With best wishes

A handwritten signature in black ink, appearing to read 'Christine Payne', with a large, stylized initial 'C'.

Christine Payne
General Secretary