

October 2013

Response from the International Broadcasting Trust (IBT) to the Ofcom Consultation on the Renewal of the Channel 4 Licence

Executive Summary

1. IBT welcomes the opportunity to respond to this consultation by Ofcom on the renewal of the Channel 4 Licence.
2. The International Broadcasting Trust (IBT) is a membership-based organisation. The views in this submission reflect the concerns of IBT's member agencies regarding adequate common understanding of the world in which we live. These concerns are shared by millions of UK supporters of these organisations. Channel 4 has always contributed significantly to UK understanding of the wider world and is valued by our members.
3. IBT supports Channel 4 in the delivery of its public service remit, especially in its commitments *to support and stimulate well-informed debate on a wide range of issues, including by providing access to information and views from around the world and by challenging established views and to inspire people to make changes in their lives.*
4. IBT views Channel 4 as an essential element in the broadcasting ecology of the UK – providing a platform for a diverse range of alternative voices.
5. IBT welcomes the report by Ofcom prepared for this consultation which usefully lays out the context of this licence renewal and highlights aspects of Channel 4's performance which are relevant to the delivery of its public service remit.
6. IBT agrees with Ofcom's conclusion that the licence conditions for independent production, out of London production, originated programming and UK news and current affairs are appropriate and should remain unchanged.
7. IBT supports Channel 4's proposal that the out of England production quota should be set at 9% in 2020.
8. We also support the maintenance of the Schools programming quota at 0.5 hours per annum.
9. We agree that the term of the new licence should be for ten years.

Question 1: Do you agree with Ofcom's view that the current licence conditions remain largely appropriate to securing Channel 4's obligations?

11. IBT agrees with Ofcom's conclusion that the licence conditions for independent production, out of London production, originated programming and UK news and current affairs are appropriate and should remain unchanged.
12. We note that while an extended remit for C4C was introduced by the Digital Economy Act in 2010 this legislation did not amend the licence obligations of Channel 4 itself and therefore comment on the delivery of the new remit is outside the scope of this consultation.
13. We particularly note and agree with Ofcom's comments regarding Channel 4 News, commending it for *'its strong and distinctive contribution to PSB delivery, particularly its international coverage'*¹.
14. We also note in paragraph 3.61 Channel 4's valuable contribution to current affairs programming *from around the world* and endorse Ofcom's decision to maintain the quota at its current level.
15. As stated by Channel 4's Head of News and Current Affairs, Dorothy Byrne, in February 2013, providing alternative international stories is core to the channel's remit: *'Our output is more important than ever before. It is not just about how much we do, it's about what we do. We go to places others just do not go. We have reporters and producers telling stories from perspectives unseen elsewhere. In the same way you cannot have one broadcaster telling you about Britain, it is crucial to have more than one broadcaster interpreting the world for you. Channel 4 offers an alternative way of seeing and analysing the world.'*²
16. We note the Ofcom research which demonstrates that the volume of original programmes commissioned for Channel 4 has increased in recent years and spans a wide range of genres.
17. We also note the decline in the number of hours of drama, arts and religious programming on the main channel and would encourage Channel 4 to consider how it might reverse this decline. These are genres which are well suited to the delivery of content which can engage viewers with life in other countries and cultures and may attract a different audience from that which watches news and current affairs. As a public service broadcaster we would urge Channel 4 to maintain its programming in these areas in order to reinforce delivery of its remit to provide *views from around the world*.
18. We recognise that measuring the innovation, experimentation, creativity and distinctiveness is a subjective exercise but we welcome Ofcom's attempt to do so.

¹ Ofcom *Renewal of the Channel 4 Licence* - page 24

² *An Uncertain Future*, the threat to Current Affairs, IBT, February 2013

19. We agree that Channel 4's specific remit remains an important and distinctive part of the PSB framework overall (3.76) and encourage Channel 4 in its delivery of this remit in an engaging and accessible manner.
20. With internationalism at the heart of our work, IBT urges Channel 4 to ensure it works hard to deliver the commitment made in the Digital Economy Act 2010 to *support and stimulate well-informed debate on a wide range of issues, including by providing access to information and view from around the world.*
21. As can be seen from the Channel 4 Annual Report 2012, international content on the main channel decreased by 65%. We urge Channel 4 to do all it can to reverse this trend in future.

Question 2: Do you consider it would be appropriate to increase the out of England quota on the Channel 4 Service?

22. We fully endorse the ambition of Channel 4 to provide a range of programming which appeals to the tastes and interests of a culturally diverse society across the UK.
23. However, while we accept that productions which originate outside England may reflect the different communities and cultural interests of the regions outside England, we do not believe this is guaranteed. To suggest that a producer in Glasgow, for example, will predominantly make programmes about his or her local interests or community is a rather narrow view. Therefore we only partially agree with the point made by Ofcom in paragraph 3.99.
24. We believe that as a public service broadcaster Channel 4 should support production companies from across the UK and therefore we agree that it should make a firm commitment to commission content from a range of companies both inside and outside England. We agree that without an out of England quota, production is likely to be concentrated in a limited range of centres. (3.98)
25. IBT does not want to specify the level at which the quota should be set because it is outside our area of expertise although we would support the suggested level of 9% proposed by Channel 4 to be reached by 2020.

Question 3: Do you agree with our proposal to leave the existing licence condition for schools programme unchanged? What role do you consider the main Channel 4 service should play in delivery of its education remit? Are the existing licence conditions appropriate to this?

26. While we recognise that there has been a significant decrease in the number of hours of schools programming broadcast by Channel 4 and other PSB's in recent years, we believe that existing licence conditions are appropriate. We do not believe the quota should be increased above its current level.

27. We agree with the findings of Ofcom's 2009 PSB Review that schools programming (formal education) can be most effectively provided online. There is a wealth of such content available and it can be more easily exploited than live linear television programming.
28. We believe Channel 4 has an important role to play in engaging the older children/young adult audience because as a channel it appeals to a younger audience than the other PSB's and engages this audience well with innovative content.
29. The content Channel 4 provides for older children and young adults is informally educative and plays an important role in engaging this audience with issues which are relevant to them, such as sexuality, bullying and vocations.
30. We agree with Ofcom that C4C should *establish a set of measures within its SMCP to benchmark its delivery of education content to this particular audience*. We believe this would be useful in assessing delivery of this important aspect of the Channel 4 remit.
31. We encourage Channel 4 to continue providing a platform for alternative voices designed for this younger audience which is relevant to them growing up in the UK.
32. We would also encourage Channel 4 to increase the content which provides a 'window on the wider world' for this audience – to encourage a more global perspective. Research shows that when young people are made aware of cultures and traditions outside the UK this leads to greater social cohesion within the UK itself.³ As part of its public service remit we believe that Channel 4 can usefully contribute to this aspect of informal education for young people – encouraging greater tolerance and understanding of other cultures and religions.

Question 4: Do you agree with the assessment set out of the market changes and futures challenges for C4C in sustaining delivery of Channel 4 and its licence conditions?

33. We agree with the assessment set out by Ofcom of the market changes and challenges for C4C in sustaining delivery of Channel 4 and its licence conditions.
34. While we recognise the commercial challenges Channel 4 faces, we encourage it to continue to be risk-taking, innovative and distinctive.
35. Channel 4's cross-subsidy business model is unique in UK broadcasting and allows it to invest in less profitable content. We encourage it to continue

³*Impact of Global learning on public attitudes and behaviours towards international development and sustainability. Think Global (2010).* <http://www.think-global.org.uk/resources/item.asp?d=2076>

breaking new ground in genres and with subjects which are often challenging but provide alternatives to what is available on the other public service broadcast channels. Channel 4's cross subsidy model, for example, allows a significant contribution to international current affairs which otherwise might not be possible.

36. We recognise that the increase in broadband proliferation will have an impact on Channel 4's business model and encourage Channel 4 to develop its online delivery accordingly to ensure its reach and impact is maintained.
37. We would welcome any regulatory levers available, such as beneficial EPG positioning, which may support Channel 4 in its mission to be easily discoverable when delivering public service content. We would urge the government to consider such levers when reassessing its broadcasting policy as part of its Communications Review.

Question 5: Do you agree with our view that the Channel 4 licence should be renewed for a 10 year period?

38. We support Ofcom's proposal to renew the Channel 4 Licence for a period of 10 years.
39. This provides business certainty which is essential for Channel 4 to be able to plan and invest in content.
40. We welcome Channel 4's statement that 'the over-riding focus of the organisation will remain maximising the delivery of its public service remit on a self-sufficient basis'.⁴

Background: About IBT

IBT is a membership-based organisation. The views in this submission reflect the concerns of IBT's member agencies regarding adequate common understanding of the world in which we live. These concerns are shared by millions of UK supporters of these organisations. IBT's members, being intimately and operationally concerned with the effects of 'globalisation' on communities and environments around the world, and with communicating across the world, welcome the advent of the global information society.

IBT's position, reflected in all our policy work since 1997, is that coverage of the developing world should not just focus on images of suffering which is more often than not what is presented in news coverage. It is IBT's view that an international dimension should be an integral part of all programming.

IBT's current membership includes the following organisations: ActionAid, Age International, Amnesty, Anti-Slavery International, Bond, British Red Cross, Buglife, CAFOD, Christian Aid, Comic Relief, Concern, CRIN, DEC, Doctors of the World, HelpAge International, Human Rights Watch, IDS, International HIV/AIDS Alliance, Int Rescue Committee UK, Islamic Relief, Malaria Consortium, Malaria No More UK, Marie Stopes

⁴ Ofcom, Channel 4 Licence Renewal Consultation Document, 25 July 2013, page 5

International, Media Trust, MSF, ONE, Oxfam, PANOS, Plan, Practical Action, Progressio, Raleigh International, Save the Children, SciDev, Tearfund, Traidcraft Exchange, TVE, UNICEF, VSO, WaterAid, WWF, Y Care International.

IBT is a registered charity, number 1150778.

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