

Ofcom's Second Public Service Broadcasting Review

Response from the Church of England

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The nature of broadcasting in the UK and the experience of viewers will be fundamentally changed

1. without the capacity to maintain **social cohesion** through public service content
2. without new funding, fresh commitment and access to multiple channels, internet and mobile platforms which will bring public service content to **new audiences**
3. without its comprehensive character and **broad appeal** to all tastes through a variety of types of programmes, including programmes about faith and the lives of believers
4. without **fresh funding or incentives** in the post-switchover digital world to sustain a variety of public service content producers

1. Social Cohesion

- 1.1. The effect of public service broadcasting on social cohesion is highly socially desirable.
- 1.2. The BBC should not be left to be the sole provider of public service television given the importance of competition to maintaining the quality of programmes and Ofcom's research finding that the public appreciates many providers.

2. New Audiences

- 2.1. The cohesive qualities of public service content are partly attributable to reaching large numbers of people. It is therefore essential that public service content continues to be as widely available as possible. It must be available on the internet, on mobile platforms and on a variety of channels appealing to different tastes.
- 2.2. Reliance should not be placed on the internet to too great a degree to deliver public service content given the possibilities which exist at present for re-inforcing social exclusion either for rural communities or elderly communities for whom television is likely to be the primary means of delivering this content for sometime.
- 2.3. Television and other outlets should continue to reflect local and community news in order to promote social cohesion and a sense of identity.

3. Broad appeal

- 3.1. Public service content should continue to embrace the widest range of programme types in order to maintain the broadest appeal.
- 3.2. Programmes about faith and the lives of those holding faith as well as programmes examining the larger questions of life should continue to feature in public service output, given the significance of faith for promoting social cohesion, the complex nature of modern society and the desire of audiences, reported in Ofcom's research finding (Source PSB Review Survey: Q14, 2,260 UK adults aged 16+, October - December 2007) that

“TV should help to promote understanding of religions, cultures & lifestyles” (fig 4 PSB2).

- 3.3. Britain’s cultural identity is still predominantly Christian. There are 1 million children being educated in Church schools, 86% of the population visit a church during the course of a year, Churchgoers contribute 23.2 million hours of voluntary service outside going to church, 1 in 5 adults visit a church to find a space for peace and quiet during any year - the same number who worship in church once a month or more. After 18 centuries, Christian faith continues to inform public life in Britain. For the fourth year the numbers of Religious Education candidates for GCSE and A/S level has risen, suggesting the high value placed on its insights by students.
- 3.4. We reject Ofcom’s suggestion that audiences attach less significance to religious output (6.60). There is still a concern that audiences only think of televised church services as religious content, important though those are. The higher audience figures and extremely high audience appreciation figures for programmes like Seaside Parish, Helen House and The Monastery bear this out. Ofcom’s own figures show that religion is still considered socially significant (Ofcom PSB Review fig9). We are also concerned that the contribution of niche religious channels to general audience consumption is overestimated. There is no incentive under the current licensing regime for specialist religious channels to serve a wider audience beyond the special community of interest they currently reach.
- 3.5. There is also clear hunger for programmes about spiritual, moral and ethical issues that are broader. This is clearly seen in the level of satisfaction and the sizes of audiences for recent successful programmes such as the BBC’s Helen House documentary about the work of a children’s hospice run by a nun or the BBC series The Passion about the events leading up to Christ’s resurrection.
- 3.6. The Ofcom finding that audiences still regard broadcasting as their preferred source of information about their region is significant, especially given the context that the BBC is proposing a significant web-based local information service. The poorer or elderly audience who might particularly welcome such services must not be ignored.

4. Fresh funding or incentives

Sources of Funding

There has already regrettably been some reduction in the range of public service content as ITV has withdrawn from some of its obligations. It remains to be seen whether ITV would respond to the possibility of new subsidies by re-instating some of this content.

It may be that ITV’s programme strategy has moved too far away already for this to be the case. But we believe that ITV should not have been allowed to relinquish its obligations so easily and that if there is a possibility of new subsidy being provided, they should be given the opportunity to benefit from that, at least to some degree, given ITV’s professed ambition to remain a psb channel. The obligations placed on them and other public service providers might however be enlarged to stipulate that their content should be made available through all available platforms. The provision of public service content on the internet and elsewhere cannot be left just to chance, but requires a catalyst.

We welcome Ofcom’s recognition that there are ways in which new subsidies or sources of income can be found. Sufficient funding for public service content in a post-switchover world, where there are many more ways of delivering content, is unlikely to be achieved by moving existing licence fee funding around. New sources of income are needed.

Advertising should continue as a source of funding public service content. The advertising revenue lost to the internet might possibly be recouped if online content earned some of it back. We favour **funding option 1, but not if funding is direct from Government, which could lead to allegations of political interference.**

The licence fee

- 4.1. Top slicing the BBC licence fee might damage its capacity and influence and we oppose it. The “*extraordinary flowering of public purpose content in digital media from a variety of sources*” –*Executive Summary, p3* is not of itself evidence of the market’s capacity to produce this type of content spontaneously. It results from the dominance of public service values in UK media arising in large part out of the BBC’s scale.
- 4.2. That said, new subsidies for psb content to **any channel** not just ITV/C4/C5 which wishes to produce public service output should be allowed in moderation to make public service content available wherever it will be watched, much as proposed in **Funding model 4**, which does not designate specific channels as psb providers, but might place obligations of them and other channels for particular strands of output. This is a flexible arrangement to which we can give some support, while voicing concern about the administrative burden of delivering it.
- 4.3. We also oppose the splitting of the licence fee on the basis of diverting ring-fenced Digital Switchover funds to funding other broadcasters after 2012. The DCMS assert that the licence fee has not yet been divided and that although the Switchover money is ring-fenced, the funding settlement is based on this returning to the BBC for programme making after 2012. To divert it would be a breach of that agreement.
- 4.4. Preserving the licence fee as BBC-only funding will maintain the broadest appeal of public service broadcasting with the least risk of exclusion of the vulnerable or poor or elderly, whose needs should be an important factor in decisions made about the future shape of UK media.

Channel 4

- 4.5. Funding for public service television content needs to take account of future funding needs for Channel 4 but should explore the possibility that Channel 4 could find new and innovative solutions itself. The recent initiative to seek new Trust Fund money for public service programmes is the first recent attempt to bring genuinely new funding into public service television and deserves serious consideration and development

Incentives

- 4.6. The proposals for access to spectrum at below-market prices, revised advertising minutage rules, or public service broadcaster status on electronic programme guides are all ideas with merit. They also have the benefit of being new sources of funding which do not involve increasing the commitment of the public purse.
- 4.7. If no other means is available, we would support additional public funding from hypothecated proceeds from spectrum auctions or spectrum charging and only as a last resort from direct taxation.

We are aware of the submission made by the Catholic Bishops’ Conference of England and Wales and fully support its content.