

South West Screen's response to OFCOM's Second Public Service Broadcasting Review

South West Screen is the regional strategic delivery agency for the creative media sector in the South West of England.

Working across a range of moving image sectors and platforms our role is to:

- Influence opinion to shape the decisions and policies which impact on the creative and media industries;
- Raise awareness of the importance of the creative media industries to the cultural and economic life of the South West;
- Invest in creative people to enable professionals, newcomers and young people to expand their skills and horizons;
- Provide investment to support talent, encourage innovation and develop new ideas;
- Connect people, businesses and organisations, enabling effective training, networking and knowledge-sharing.

South West Screen leads a programme of investment-led, capacity-building interventions aimed at realising the growth potential of creative people and businesses and ensuring long term sustainability. We also seek to improve opportunities that increase the public's access to digital content and the moving image –as a viewer, a participant or a producer – and have strived to address barriers to entry, whether these are cultural, economic, social or demographic.

Due to the dispersed nature of the South West region, early in its development South West Screen established a series of partnership groupings around the region which enabled the industry to meet and network. Five "cluster" groups have grown from this initial intervention in Plymouth/Devon, Cornwall, Gloucestershire, Wessex and Bristol with a sixth in an early development stage in Swindon. The cluster group network continues to be supported by South West Screen and has grown to 4,000 members. This network gives the agency its

knowledge base in terms of the sector's needs and interests and ensures a needs-led approach.

South West Screen's network approach is replicated in other areas of delivery – through media education hubs – linking practitioners, schools, colleges and venues working in community media and media literacy; via the regional exhibitors forum – connecting screening venues and film societies in the South West and finally through the regional skills panel – a partnership with Skillset which brings together employers and training providers to assess and respond to skill needs and demands.

We welcome the thinking and challenges laid out in Ofcom's consultation document which is both timely and forward-thinking. This document summarises our responses to the questions set by Ofcom and invites further discussion on creative solutions to ensure the British citizen continues to receive the very best public value from broadcasters.

In the first section of our response, we make general observations on the issues raised by Ofcom in Sections 3 to 8 of the Review, with particular reference to those issues which affect the English regions. In the second section, we offer some specific comments on the issues raised in Section 9.

Comments on Ofcom's overall approach

We would agree with the assessment made by Ofcom that, at least in the short term, television will continue to have an essential role in delivering the core purposes of public service broadcasting. But the current funding model, predicated as it is on linear TV broadcast, does not have the flexibility that is needed to take account of changing viewing habits and the impact of new platforms and technologies.

In addition the combination of reducing advertising revenues and audience fragmentation is continuing to impact the provision of PSB within the commercial sector. The retreat of ITV from the regions of England is the prime example. This is at a time when research indicates as high an appetite as ever for regional and local news and a continuing demand for programmes that reflect the different textures of the UK on screen to the nationwide audience. We would assert that

this last element of public value remains extremely pertinent and should be protected within any new model. We agree with Ofcom's assessment of the implications of the changing economic scenario for the UK TV market and the future prospects for public content delivery services.

The Review recognises that the out-of London Production quotas have not necessarily yet delivered the desired investment – nor are the UK's diverse cultures and audiences portrayed as fully as they should be. We would contend that any new PSB regulation or codes of practice should maintain a clear commitment to diversity and a multiplicity of voices. The recent BBC Trust report on impartiality is a welcome step forward in this regard.

Television will continue to be an important medium to deliver the values of public service content and, whilst internet-based channels may eventually deliver more interactive and targeted services, they still face substantial handicaps. In a rural region such as the South West, for example, broadband coverage and bandwidth remains uneven, and universal access is still some time away. Whilst it is undoubtedly true that other digital channels and interactive media contribute towards public purposes, we would agree with Ofcom's proposition that people are less likely to discover public service content online than they are on television.

But the changing audience demographics for television convince us that, in order to remain relevant, public service content needs to ensure it is embedded in the new platforms and services that UK audiences – particularly younger audiences – are drawn to. We would assert that more intervention, in terms of signposting and brokerage, is needed to ensure that content which meets public service aims is actively promoted so that it reaches its intended audience. With the arrival of IPTV, all broadcasters will need to emulate the BBC by connecting with audiences across all media. Given their privileged position, PSB broadcasters should also seek more actively to engage with other public service content providers.

We believe plurality is important and we recognise the particular aspects that current providers bring to PSB delivery. However, especially in rural areas, the economic base to support a variety of audio-visual services may not sustain existing commercial models, so we recognise that existing services, like ITV's sub-regional news services, may not – in the long term - be the model for future services. However, we would also emphasise the need for further consultation

and debate before any major revision of ITV's public service licence commitments is agreed.

We should particularly like Ofcom to note the following points.

- We recognise the importance of the BBC, with its world class brand, as a lead supplier for PSB and as an “anchor” tenant within our regional production sector. We would argue that it is the strength of the BBC in Bristol which has provided the basis for the growth of the production sector in the city and its growing reputation as home to one of the most diverse creative communities in the UK.
- We support the argument for plurality. However, our belief is that the discussions about how to secure plurality should engage fully with issues of representation and regional texture when discussing supply.
- We support the vision and ambitions set out by Channel 4 in their plan “Next on Four” and would endorse the role they are playing as a creative and cultural investor. Their commitment to the new and innovative, as well as their efforts as a creative catalyst, have done much both to open supply to PSB and to reflect regional and cultural diversity.
- We are not supportive of ITV's regional news proposals or on their retreat from regional commitments at this point. We understand ITV's problems and recognise the need for new thinking, which will no doubt emerge during the second phase of the Review. We shall welcome the opportunity to participate in this debate.
- We believe that indigenously produced film that reflects contemporary Britain is an important element of PSB. It offers an important dimension to any debate on the expression of cultural identity – regardless of how it is delivered e.g. via traditional television or new digital platforms.
- We note that the Regional and National Screen Agencies already provide an infrastructure for investments in PSB content. As converged agencies, they already work beyond traditional broadcasting, have grassroots relationships with a host of commercial, community and social entities within each region and bring together both cultural and economic impacts. Currently this network

is under-capitalised and has limited capacity. However, the agencies have proved their value as connectors, brokers, catalysts and centres of expertise. We would encourage Ofcom to exploit the opportunities offered by this existing public architecture rather than invent new structures or relying on a metropolitan solution.

Answers to the Questions in Section 9

1. We agree with Ofcom's assessment of the likely long-term issues as they apply to the nations, regions and localities of the UK.
2. We believe discussion should focus on fleshing out how Models 3 and 4 might be implemented. We have already noted the importance of Channel 4's recent initiatives, and we believe – particularly for a primarily rural region, like the South West – new forms of intervention may be needed both to ensure plurality of high quality regional and local news supply and to encourage network production. We also think it important that PSB providers work more actively in partnership with other public service content providers [e.g. Screenonline, the BFI's portal to national and regional film archives].
3. Here are our comments on the short and medium term issues :
 - Production quotas, sensitively managed, are needed in the short and medium term both for the nations and the regions.
 - BBC out-of-London quotas should be set, by agreement with the BBC Trust, alongside other out-of-London quotas.
 - ITV's current proposals should be determined during Phase 2 of this Review, not ahead of its outcome.
 - Non-news ITV programme quotas should be determined during Phase 2 of this Review.
 - Any other short term changes to ITV's licence commitments should not go ahead at this stage unless there is no effect on the service to viewers.
4. We do not want to comment ahead of phase 2.