

## Centre for Media and Culture in Small Nations, University of South Wales

### Response to DCMS' PSB Contestable Fund Consultation

The Centre for Media and Culture in Small Nations coordinates research on media, culture, communication, theatre and performing arts in Wales through the frame of small nations globally. The Centre facilitates exchange between industry, policy makers, academics and the wider public through regional, national and international dialogue and collaborations. By working with funders and partners on a range of innovative projects, we contribute to an understanding of the distinct identities of small nations and their media systems.

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#### Response:

- 1) (i) Should the fund be broadly or narrowly focused? (ii) On which genres and audiences should the fund be focused? a) Arts & classical music b) Children's c) Religion and ethics d) Education e) Factual f) Nations & Regions g) Diversity (i.e. content for/about protected groups) h) Other, please specify.

It is important that the Contestable Fund maintains clear sight of which specific problem(s) it is trying to solve. There is an unhelpful slippage in parts of this consultation document between a tight focus on genre and much broader consideration of audiences. For example, as presented, this list of options implies that nations and regions programming cannot entail arts or religion content. This clearly is not the case.

We would support a broad focus in the pilot phase. Specifically, we would advocate the fund begin from the point of considering the holistic service expectations UK audiences have of public service broadcasters *including* the commercial PSBs who have seen a reduction in the range of their PSB delivery.

In Wales, there is considerable public support for public service broadcasting. However, there is considerable evidence pointing towards a severe lack of programming reflecting Wales in the English language in a very wide range of genres including arts, comedy, drama, entertainment, religion and science.

As Tony Hall, Director General of the BBC acknowledged in April 2014 'English language programming from and for Wales has been in decline for almost a decade' which now means that 'there are some aspects of national life in Wales that are not sufficiently captured by the BBC's own television services in Wales, and I would include comedy, entertainment and culture in those categories' (Hall 2014).

Figure 1 in this consultation document risks giving a misleading impression of genre output by solely providing UK-wide figures. It also fails to represent the impact of substantial funding cuts to the sole Welsh-language television service, S4C.

An appreciation of the specific under-provision of PSB in each of the UK nations is necessary if contestable funding is genuinely going to lead to perceptible improvements across the UK and adequately represent the devolved realities of media policy and provision in the nations (see McElroy et al 2017).

- 2) (i) Should the fund extend to radio as well as TV? (ii) If so, how should the proportion of the fund available for radio content be capped? a) 5% b) 10% c) 15% d) Other, please specify.

Yes, we support the suggestion that the fund extend to radio as well as TV.

Radio, in its diverse commercial, community and PSB forms, plays a part in the media lives of the majority of British adults. It offers significant benefits in terms of cost and a relatively shorter production phase which may prove especially beneficial during this pilot.

The expansion of original audio content between platforms, for example through podcasting online, testifies to the capacity of radio to bring diverse audiences together, reaching out beyond the immediate listenership and reaching new audiences often across national boundaries.

We believe that this contestable fund should consider how supported radio content might be shared and transferred between platforms in order to inform our understanding of the world, stimulate knowledge and learning, to reflect UK cultural identity and represent diverse viewpoints.

We do not have a view on the specific percentage to be available for radio, though we think it should not be at the very lowest end of the spectrum named here.

- 3) With regards to ensuring that content is free-to-access and made widely available, what platforms should be available to content funded by the contestable pot? a) Linear broadcast only b) Linear and associated broadcaster on-demand platforms c) Linear, on-demand and other online platforms (such as YouTube).

In principle, we support (c) given the realities of the digital media ecology and evolving patterns of media consumption. However, there are issues to be considered carefully here and if these cannot be addressed, then we would see (b) as a credible measure for this pilot phase.

We identify the following issues in including 'other online platforms'

- a) Regulatory control – this consultation document rightly emphasizes the need for supported content to be free-to-access and made widely available but it is not entirely clear how the contestable fund could ensure this on digital platforms that are not regulated from within the UK nor how this would work over a longer time period.
- b) Findability - while the growth of diverse online platforms offers genuine opportunities to co-produce and share original content, audiences still need to find this content in the first place. Consideration must therefore be given to how the content will be made known and readily accessible to all across the UK and across generational and socio-economic divides.
- c) Language – digital platforms offer genuine opportunities for minority-language audiences and content. However, in a context where English remains the dominant language of the internet, consideration should be given to the particular needs of minority-language content producers in securing and sustaining access to minority-language content online beyond the existing catch-up provision.

The speed of the change of audiences interacting with audio visual content are reflected in the figures supplied by S4C in their Press Release 06/01/2017 'Views double in three months for S4C.'

' The viewing figures for video content that S4C makes available via social media sites have doubled from over a million to over two million in three months.

Last September S4C digital content was watched over a million times for the first time ever - then in December 2016 it was viewed over two million times.

Since implementing new working practises with S4C's social media in October 2015 the number of views for video content on Twitter, Facebook and YouTube has gradually been increasing.

After reaching 737,200 in August 2016, the number of times that video content has been viewed in September 2016 passed the million mark and in December was viewed 2,235,543 times'.

- 4) Which of the following broadcasting/distribution criteria should be placed upon qualifying bids? a) Broadcaster/platform guarantee not required in bid b) Broadcaster/platform guarantee required in bid c) Award permitted "in principle" subject to broadcaster/platform guarantee within a particular timescale.

Given the timeframe of the pilot phase, it is tempting to support option (b).

However, option (b) risks reproducing the very problem the contestable fund is seeking to solve. Making PSB support for this content conditional for funding could be seen as putting gatekeeper control in the hands of the very organisations that have failed to deliver sufficient PSB content to date in these key genres and service areas.

It may be difficult to navigate the protocols needed to access the confirmation of the broadcaster and/or distributor. We may lose the content and personnel in protracted 'sign off' assurances and under serve the potential PSB content and audiences. Option (c) may therefore be preferable.

Putting this in the context also of question 3 above, it is unclear what platform guarantees would mean for any content not commissioned for broadcast via established broadcasters (e.g. what would a YouTube guarantee look like, for example and how could it be enforced over a period of time?).

- 5) (i) To what extent do you agree with the pilot administration model (figure 5)? (ii) If not what other options should be considered?

This seems broadly fine. However, administrative expertise must reflect the specific characteristics of service provision in the different nations of the UK including the bilingual nature of their media ecologies and the substantial scale of under provision within Wales.

- 6) To what extent do you agree that the BFI is a lead candidate to administer the fund?

BFI is a credible candidate for consideration given its experience in awarding production and development funding competitively.

However, the extent to which it has genuine insight into the diverse broadcasting markets and audiences of the UK nations is far less clear.

Moreover, the perception could be that audio-visual media will be better served than radio given the existing profile of the BFI.

Other organisations worth considering and with the experience to administer the funds are the Arts Councils of the UK nations. These are Arts Council England, the Scottish Arts Council, the Arts Council of Wales and the Arts Council of Northern Ireland. They have close relationships with communities and diverse third-sector organisations in the broadest sense. They also have the infrastructure to administer the funds along with existing relationships and reputational awards.

The Arts Council for Wales supports a bilingual policy. We cannot identify a BFI bilingual platform. This will likely create a perception of not being inclusive within Wales.

- 7) Which of the following conditions do you think should be placed on successful funding awards: a) The fund should require matched funding from broadcaster/platform or other commercial partners b) The fund should be able to recoup up to the amount granted to a successful programme c) The fund should grant money by way of an equity investment d) Other, please specify.

Requiring match funding from the broadcaster/platform is an appealing proposition as it would place some responsibility with them to deliver improved PSB content provision. The under-representation of certain forms of PSB content is a problem of demand which stems largely from a reduction in or outright lack of commissioning in certain key genres and service areas.

However, as stated in response to Q1 above, the scale of the problem in Wales – i.e. major deficits in arts, children's, drama, entertainment, religion and science programming - may make it hard to secure match funding for a broad range of potential proposals. A recent report, 'The Big Picture' by the National Assembly for Wales, Culture Welsh Language and Communications Committee (February 2017) noted that BBC should spend an extra £30 million on programming for Wales. Research undertaken by the Institute for Welsh Affairs in its 2015 Wales Media Audit Report testifies to the scale of under provision in Wales (IWA 2015).

Careful consideration is required to ensure this proposed contestable fund does not place Welsh-language providers at a disadvantage, in light of S4C's unique position and uncertainty about its longer-term funding. This point may also pertain to Q4 above.

- 8) Which of the following criteria should the fund consider in respect of judging bids for funding? a) Quality b) Innovation c) Additionality d) Nations and Regions e) Diversity f) New Voices g) Other, please specify.

We understand the importance of all these areas within PSB. However, the overriding criteria should be that the award demonstrate clearly how it would improve the provision of currently under represented PSB provision.

The other criteria listed here will overlap and may indeed skew the content in order to fit within the specified requirements for judging bids. They may actually narrow the content and could lose some

of the essence by being tailored to such specific criteria.

- 9) How can “additionality” (i.e. ensuring the funding is not replicating funding that would otherwise have been available) best be assessed?

This is a vital question and one which goes to the heart of the challenge facing the contestable fund as a policy lever designed to solve a very broad and, by now, relatively long-standing problem.

Unless the contestable fund is put to work *alongside* other policy levers, the result will likely be that it will plug only a few of the holes left by many years of under-commissioning PSB content in these key areas.

Indeed the contestable fund could look like a bureaucratic and costly shorter-term programme achieving results that might have been achieved equally as well by reviewing existing and recently lost quotas for PSB provision. Notable here, for example, are historic quotas for children’s media and the network portrayal objectives now being used across all genres within the BBC (see Lord Hall’s evidence to the National Assembly for Wales’ Culture, Welsh Language and Communications Committee, 2 November 2016).

Improved provision in the nations and regions by BBC has been promised by Lord Hall and the BBC has recently appointed Ken MacQuarrie as Director of Nations and Regions. However, it is unclear what level of spend or what criteria for the allocation of funding will be used by MacQuarrie.

Transparency and accountability for all broadcasters’ investment is vital if additionality is to be assessed. This requirement for transparency and accountability should be placed on *all* broadcasters with any level of PSB commitments and not on the BBC alone. The future provision of diverse PSB content can only be evaluated when looked at holistically and not with regards to any one broadcaster only. ITV, Channel 4, Channel 5 and S4C - in different ways and to different degrees - all make substantial contributions to the UK’s plural provision, to our cultural life, and to the capability of the UK’s broadcasting system to sustain an informed, educated and entertained citizenry.

This Contestable Fund pilot phase looks likely be introduced during a period of major change for the UK in the context of Brexit. This consultation makes no reference to Brexit or to the specific areas of concern felt by producers given uncertainty in their operating environment. One such area of uncertainty is longer-term access to the Creative Europe programme.

The Creative Europe programme supports the UK’s creative sector including audiovisual companies providing PSB content. In Wales, for example, the bilingual drama *Hinterland/Y Gwyll* made by the independent production company Fiction Factory and enjoyed in Welsh by S4C’s viewers and in English by both BBC Wales and BBC 4’s viewers, received substantial MEDIA funding without which it is unlikely the series would have been made.

We would urge the reviewers of this consultation to reflect carefully on what the implications of a contestable fund might be in a (post) Brexit environment. Further, we suggest reviewers draw on expertise (including responses to the Culture, Media and Sport Committee’s inquiry into the impact of Brexit on the creative industries and the single digital market) to ensure that changes in access to European funding do not impinge of the aim of making significant improvements to under provision of PSB content in the UK.

## References:

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