

Written evidence submitted by The Advisory Committee for England

DCMS Committee Call for Evidence

- **Regulation:** Are the current regulations and obligations placed on PSBs, in return for benefits such as prominence and public funding, proportionate? What (if any regulation) should be introduced for SVoDs and other streaming services?
- **Representation:** How would representation be protected if changes were made to the PSB model? How would the nations and regions be affected by changes to the PSB model? Is the 'quota' system the most efficient way to maintain and improve representation in broadcasting?
- **Accessibility:** How would changes to the PSB model affect the accessibility of services? How would a wholly internet-based service compare to the current PSB model?
- **Impact:** What value, if any, do PSBs bring to the UK in terms of economic (local and national), cultural and societal impact?
- **Looking ahead:** What should a PSB look like in a digital age? What services should they provide, and to whom? In what way, and to whom, should they be accountable? Is the term 'public service broadcasting' still relevant and, if not, what is a suitable alternative

Our remit

The Advisory Committee for England advises Ofcom about the interests and opinions, in relation to communications and postal matters, of persons living in England. The Committee provides advice to Ofcom about general and specific issues concerning the communications sectors arising within England. Many of these issues are common to the whole United Kingdom, although there are subtle differences arising from the different Government arrangements in the devolved nations.

Commenting on Ofcom's plan of work for 2020 earlier this year, the Advisory Committee for England observed that businesses regulated by Ofcom were experiencing significant change driven by both technology developments and changes in the way their customers interact and use the services provided and that Ofcom had to find the right balance between regulation and flexibility for the businesses to evolve to meet these challenges. All of these factors apply to the broadcasting sector, and the boundaries between broadcasting and online content are becoming blurred as broadcasters join online platforms and viewers watch and listen to online content on connected tv screens.

England is perhaps one of the most diverse of the four nations and we welcomed the recognition in Ofcom's workplan of the needs of different groups of users, with different backgrounds, ethnicity and particular additional needs. Users can be both individuals and businesses, both small and large, and the needs of these groups vary immensely between urban and rural areas. The Committee provides advice to help to ensure that solutions for rural areas enable communication services to be provided consistently, regardless of location.

Public Service Broadcasting

We welcome the ambition that Ofcom has set out in the Small Screen: Big Debate proposals to involve the widest participation possible in its review of Public Service Broadcasting. We had planned our programme of meetings in 2020 to take in rural and metropolitan locations around England, starting with Bradford where we were to be hosted by the University of Bradford Media School, an event that has been postponed until such time as travel constraints have been lifted. We were able to discuss with the Channel 4 team responsible for setting up the new Leeds Centre the impact of having one of the national public service broadcasters based in the North East. We have no doubt that the current regulations and obligations placed on the PSBs were directly responsible for Channel 4's decision to create new hubs in Leeds and Bristol and that this will result in new and different voices being heard in its programmes and creating and developing content. This has significant cultural and societal impact, bringing a better understanding both within the creative sector and across audiences of the rich variety within and across England.

In response to the coronavirus crisis, Ofcom has adapted its approach to Small Screen: Big Debate and is considering how to strengthen and maintain PSB both in light of the impact of corona virus and for the longer term, taking account of both the economic pressure on the sector and the important role played by the PSBs, and other media organisations, in keeping the public informed, conveying government information and advice and providing relevant content for UK audiences. We support and plan to contribute to this revised approach and welcome the consideration that Ofcom is giving as to whether to conduct further research about the extent to which the current crisis has affected audience attitudes towards the PSBs and the content offered during the period.

Representation

As a Committee, we take the widest definition of "representation" including race, gender, (dis)ability, sexual preference, regional accent and socio-economic position. We consider representation to be a core responsibility of the public servicing broadcasting ecology and one that is more critical for civil society today than it has ever been. We also note that this is a dynamic issue, and one that needs careful review as the construction of populations in specific geographic areas changes over time.

We see little evidence that the commercial broadcasting market values and invests in representation and we believe that representation must be protected if changes are made to the PSB model. The quota system has proved to be an effective tool for maintaining and improving representation in broadcasting and we see even more opportunity to showcase talent in England outside of London as different forms of content, typically accessed online, are added to the more traditional forms of broadcasting. We also welcome the commitment to diversity within the industry and see this as another key contribution that arises from the regulation around public service broadcasting.

Accessibility

The current system ensures that all public service broadcasting channels are universally available and free at the point of consumption. We consider this to be an important principle as it ensures that those who are most vulnerable and least able to pay are not denied the considerable benefits that the PSBs deliver.

We also note the requirement for the broadcasters to ensure their content is accessible to people who are visually or audio-impaired, and that the PSBs are held to higher quotas for subtitled, signed or audio described content. This is a service that is valued and valuable and should be maintained.

Impact

We note that, during a time of extraordinary national crisis, the Public Service Broadcasters have had the flexibility, resources and incentives to adapt their content and output quickly and effectively to support the public. This has been illustrated most powerfully by those households who have had to home school their children, supported by significant investments in content from the PSBs.

The public has turned to the PSBs for impartial and accurate news. At the peak of the crisis in mid-April, audiences for each of the BBC news bulletins at one , six and 10 o'clock had increased by between 50 and 75 per cent. And the BBC's Global News Division had an average reach of about 430m a week in March. The "trust" figures for the BBC in the UK have also increased and Ofcom research shows that people were more likely to turn to the BBC's TV, radio and online services for the latest news on the pandemic than anywhere else.

Channel 4 News' audience effectively doubled in ten days in March attracting 20 million viewers during one week and it reported the biggest social media following of any UK news programme. ITV News also reported higher than usual audiences across all its programmes, as audiences turned to the public service broadcaster for information on the latest measures to help fight the pandemic.

It is hard to put a value on the benefits this has bought to citizens of England and the other nations, uniting us all under the most difficult of circumstances. But it is clear that the impact has been broad reaching and sustained and sits alongside by services offered free of charge by other cultural organisations such as the National Theatre, demonstrating how public services play an important role in our society.

The impact on younger audiences should be carefully considered, in the light of research conducted by Freeview showing that, notwithstanding the popularity of online streaming services among younger viewers, lockdown seems to have increased their affection and support for the PSBs. In this research, almost two thirds of 16-34 years olds said that they valued content from the PSBs more now than before the onset of Covid-19 and three quarters of 16-34s said that the PSBs played an important role in bringing together the nation in times of crisis.

Regionality

The BBC has announced a review of its news and current affairs services in England and we intend to consider carefully any submissions that it might make to Ofcom on changes to its operating licence. Regional television news bulletins across England have performed strongly in recent months and are likely to be invaluable in the future if lockdowns are reintroduced on a regional basis in response to local hotspots.

Looking Ahead

Looking ahead, we would like to see Public Service Broadcasting remain the cornerstone of our creative ecosystem, supporting production and new forms of digital consumption as well as traditional broadcasting. Our television and radio services are admired and consumed around the world, based on a unique approach that blends public-value driven and commercially driven businesses to compete for the best ideas, creators, contributors and creativity. Ofcom has a unique role to maintain and strengthen PSB and we support and applaud the way that regulation was developed to allow a flexible and purposeful approach. We support this continuing role for Ofcom and will be working closely with the teams running Small Screen: Big Debate to help develop proposals around services and accountability that will continue to benefit all the audiences in England and the other Nations.