



**TAC response to BBC Trust consultation on
Tomorrow's BBC: creating an open, more distinctive BBC**

1 Introduction

- 1.1 Teledwyr Annibynnol Cymru (TAC) is the trade association representing independent TV production companies in Wales. There are around 55 Welsh companies producing a wide range of television and other content in many genres, including children's, drama, comedy, factual, documentary, animation, entertainment, music and sport.
- 1.2 TAC members make content for several UK network broadcasters and are involved in selling programmes and formats abroad as well as international co-productions. Members also make content for the Wales-based broadcasters such as BBC Wales and S4C, the latter of which, as a publisher–broadcaster, works very closely with our sector.
- 1.3 BBC Charter Review, whilst being long-awaited, has proved an exhaustive process, with not only the Government's Green Paper, but several parliamentary and Welsh Assembly Committee inquiries. TAC has responded to each of these and the papers submitted are all publicly available on our website: <http://www.tac-cymru.co.uk/policy/>
- 1.4 Broadly, TAC believes there is sound justification for much of what the BBC does and the way in which it does it. We agree with the wide range of voices, including many from the commercial broadcasting sector, who generally state that the BBC remains a highly valued institution whose unique funding and remit means it forms an important part of a complex media landscape, in which a variety of players all contribute to making the UK the most exciting and dynamic media production base in the world.
- 1.5 On this basis the BBC needs to continue to be well-funded, and we recommend the Licence Fee, suitably adjusted to close the i-player loophole, as the best funding mechanism.

2 Supported Positions

2.1 Briefly, TAC supports the following positions set out in the BBC's 'British, Bold, Creative: our programmes and service in the next Charter'. Note that, unless stated otherwise, all page references are in relation to that document.

- (a) Because the Licence Fee is universal, the BBC's appeal should similarly be universal, providing something for everyone. This includes continuing to provide a wide range of entertainment content.
- (b) The BBC should continue to serve TV and radio audiences whilst also ensuring that its content is available to the increasing number of people consuming media on mobile and other platforms.
- (c) The BBC is, as stated by Ofcom, the cornerstone of PSB.
- (d) The BBC needs to be 'a simpler, more effective organisation where as much money as possible goes on programmes and services' (p7).
- (e) The BBC's output continues to be of high quality.
- (f) We share the BBC's concerns in terms of falling investment in original UK programming. Children's content, in which the Welsh indie sector is strong, is an especially important genre in the light of Ofcom's reporting of the lack of such content on most PSB channels, and the BBC's services in this area must continue to be well-funded and universally accessible.
- (g) We agree that the BBC's relative position in the market place is not as large as it once was, and that should be taken into account when considering the scale of the investment needed for it to continue to maintain its impact as a PSB. However we would not consider the new media landscape a reason for any revision of the terms of trade, as the BBC is still a much larger player than any individual qualifying independent production company, so those regulatory protections remain essential.
- (h) We agree in principle that 'to enable' is a worthwhile additional objective of the BBC in addition to 'inform, educate, and entertain' (p59).
- (i) We agree that the BBC's news coverage is and should continue to be 'rooted in an uncompromising commitment to accuracy, impartiality, diversity of opinion and fair treatment of people in the news' (p62)
- (j) Suggested initiatives such as iPlay and the Ideas Service are of interest in helping to achieve the BBC's mission to 'educate'. We hope that where appropriate the

independent sector will be given an early opportunity to work with the BBC to find the most innovative and effective methods of delivering and providing content.

- (k) We welcome the statement that: ‘We want to create a platform for Britain’s creativity, and an even better experience for UK audiences. These ideas are at a very early stage and we would want to discuss them with others’ (p81). Again, we very much hope that the independent sector, from around the UK, will be involved in those discussions at an early stage.
- (l) We welcome the BBC’s commitment to working with S4C as ‘a strategic partner’ (p82). As part of its commitment to indigenous languages stated here and elsewhere, we would expect the BBC to respect that S4C’s funding is a tiny percentage of the BBC’s and it is crucial that that funding is maintained and at the very least increased in line with inflation. The BBC, whatever its own financial constraints, should restrain from following the Government’s lead, following the recent Licence Fee deal, that S4C would be expected to make ‘efficiencies’. S4C has done much to reduce its overheads to 3.98% (more than 2% less than that of the BBC ¹) and it has no more real efficiencies to make. The BBC must take a principled position and realise that to preserve S4C’s Licence Fee funding at current levels is a public good. We would ask the BBC Trust to reject any proposal to cut S4C’s TV Licence Fee funding, instead it should be maintained and linked to inflation. We would also like to see Welsh language content in general, eg on Radio Cymru, protected from further cuts.
- (m) We support the BBC’s rationale for opposing decriminalisation of the Licence Fee.

3 Position on representation of the nations of the UK

3.1 We would like to address in a little more detail the BBC document’s statement that:

‘During this Charter, we ensured that what we spend on network television in each Nation broadly matches its share of the population. But we recognise that spend is not everything—we need to do more, and better, to reflect the lives and experiences of all licence fee payers’ (p46).

3.2 TAC agrees that currently the BBC does not adequately perform this function. Whilst it can point to a significant amount of production spend in Wales, much of this spend is focussed in its Cardiff Bay studios which produce dramas such as Doctor Who, and Sherlock. However what the BBC does not do sufficiently is to engage with the creative sector around the whole of the Nation to achieve the above aim, which is encapsulated in one of its public purposes.

¹ ‘British, Bold, Creative: our programmes and service in the next Charter. BBC, 2015, p77

3.3 We agree with the BBC Trust which in its Content Supply review stated that:

‘The Trust will want to ensure that the BBC has developed considered, clear-sighted plans that set out what the right commissioning mix is across the Nations and regions. The Trust will also want to see how the BBC’s production centres across the UK intend to work more effectively together with the independent sector based in different parts of the UK to develop creative, sustainable, local ecologies’.²

3.4 TAC would expect to see provisions in the next Charter that ensure the BBC carries through this policy in practice. The BBC’s content, whilst as we state above, being high quality, is not necessarily as distinctive as it might always be, and this is partly due to not fully tapping into the production companies based in communities around the Nations, which can provide many more perspectives, ideas, stories and talent than is currently the case under current commissioning practices.

3.5 We will return to commissioning practices in more detail in our response to the Trust’s consultation on the ‘BBC Studios’ document.

4 Disputed Positions

4.1 TAC disputes the following positions in the BBC’s document:

(a) ‘Another advantage of the BBC to the country’s sense of itself and community life is that it reflects, and reports upon, the whole of the United Kingdom.’ (p18). To us this contradicts the statement quoted in section 3 and we would challenge it on the basis that, as the BBC admits, it is currently falling short of this objective.

(b) We are very concerned about the following paragraph that appears in the BBC’s own response to Charter Review:

‘The BBC is also fully committed to providing services in the UK’s indigenous minority languages ... In response to the growing audience challenges faced by these services, we want to work closely with our partners to move faster online to reach younger, digital audiences.’³

First of all we dispute the reference to a ‘growing audience challenge’ for S4C. Overall, including viewing beyond Wales in the rest of the UK, its figures are healthy. The level of i-player requests for S4C has been healthy, with online viewing figures increasing by 175% from March 2014 to March 2015⁴.

² BBC Trust. Review of the Supply arrangements for TV, Radio and Online. June 2015, p17-18

³ Submission to the Department for Culture, Media and Sport’s Charter Review public consultation. BBC, October 2015, p43

⁴ S4C Annual Report 2015. July 2015, p15

Secondly, in terms of being further active online, reaching out to younger viewers is certainly important. Our members already engage with audiences on a wide range of platforms. However we very much hope that the BBC is not suggesting that S4C be an exclusively online service, for the following reasons:

- S4C is a public service broadcaster which should be widely available - Welsh speakers vary greatly in age and social background and should be able to access S4C on the platform of their choice and convenience.
- There are still significant problems regarding broadband access in Wales, especially in rural areas with a significantly high proportion of Welsh speakers.
- Some, perhaps particularly older, viewers would not necessarily find it easy to move online.
- Evidence from Ofcom demonstrates that linear viewing accounts for 69% of viewing for all adults.⁵

In general TAC has great concerns about the future of S4C's funding and independence, which we have addressed in our response to the Charter Review Green Paper, and would draw the Trust's attention to those comments.

Teledwyr Annibynnol Cymru, November 2015

www.tac-cymru.co.uk

⁵ Public Service Broadcasting in the Internet Age: Third Review of Public Service Broadcasting Ofcom, 2015, p19