Public Service Broadcasting Contestable Fund Consultation

Submission by:
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We welcome the creation of this fund and the intervention we hope it will create in the provision of public service content and to engaging audiences in new and innovative content. The proposed scheme appears serviceable and considered, though we do believe that further clarity is required around the accessibility of the fund, how broadcasters will be encouraged to engage with the fund’s outputs and how the scheme’s success will be measured in the longer term.

In considering this proposal we drew on our on-going research in the area of arts broadcasting (details of the project are available at: www.artsbroadcasting.com). Since 2014 both researchers have been examining the market landscape for arts content on television, radio and online. Interviews with various senior stakeholders including television and radio executives, the independent sector and arts organizations inform our submission to this consultation, along with careful analysis of the current policy framework to support PSB.

1) (i) Should the fund be broadly or narrowly focused? (ii) On which genres and audiences should the fund be focused?

(i) **The pilot should be relatively narrow.** This funding is a significant investment of public money but we feel that it may be quickly used up in the development and delivery of high quality output. We would like to see as much of the fund as possible going to support a select number of genres in order to streamline the funding process and seek specific remedies to structural issues within these genres. Each of these genres has its own structural issues, norms and challenges
therefore a focus on a select number of these would allow a more nuanced intervention suited to each genre’s needs. If the pilot were successful we would welcome a broader range of genres in the final funding scheme.

(ii) We believe strongly that **arts and classical music should be part of this fund.**

The decline in arts television on free-to-air channels, in terms of financial spend and number of hours, has been steady and significant. In the five years prior to 2014 spending on arts programming by the five main public service broadcasters fell by 24%, while peak-time arts output fell from 30 hours in 2009 to just 19 hours in 2014 (Ofcom, 2015a). In light of this, Ofcom has concluded that the genre is at risk of disappearing from our screen. This is significant because for the majority of the population broadcasting is one of their main points of access to the arts and culture, therefore if arts programming disappears a whole area of society is effectively made invisible (Warwick Commission 2015). The successful representation of art and artists in this programming not only engages with aesthetic history and value, but also forms of contemporary experience. As one of our interviewees commented, the best programming in the arts “takes front page issues from an arts perspective, coming at it in a way that you think, “I’ve never heard it talked about like that before””. Furthermore, we believe that a decline in arts broadcasting undermines the sustainability of the arts sector but also wider creative industries. Broadcasting, the wider creative sector and the arts sector exist in a delicate ecosystem where talent and ideas mix freely. If arts broadcasting is allowed to disappear it threatens the vibrancy of the others.

While we support the inclusion of arts, we do question why classical music has been singled out for support. We would like to see a broader range of music included as part of this genre as we feel there are important ways that this could address issues of diversity.

Previous research by Noonan also highlights the threats faced by religious and ethics programmes (Noonan 2014) and we would advocate their inclusion in the fund. Furthermore, we believe children’s content could also be part of the pilot due to the similar declines in that genre.
Therefore, we believe arts and classical music, religious and ethics, and children’s content are best suited to this scheme at this stage as they are all at a crisis point, but still have sufficient production capacity to make the best use of the funds. A small but significant number of specialist independent producers and freelancers continue to work in this area and their support of the fund will be vital to its success.

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?

(i) We make no objection to radio being included in this fund. BBC National and Local Radio currently provides a rich range of arts and cultural programming across a number of its services, particularly when compared to television and the commercial sector more broadly. If funding of radio content could ensure additionally and further innovation we would support its allocation. However, we do have significant reservations about whether the contestable funding model proposed would provide enough incentive for commercial radio stations to invest in this type of content on a significant scale and therefore we welcome further input from the sector in this regard.

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?

B. Linear and associated broadcaster on-demand platforms

One key observation from our research is that arts content is increasingly ghettoised within television schedules (normally to out of peak-time hours or niche channels) and we are concerned that making the fund available for digital strategies alone could marginalise it further, making content invisible to all but a very niche audience. Linear television is still key for ensuring audience reach and impact in the UK. As one interviewee in our study stated ‘there is nothing like the national impact of being on a national television channel. And it generates interest from newspapers; it’s part of the national conversation’. Indeed, according to Ofcom, 69% of audio-visual consumption for UK adults is through linear
television (2015b: 19). In this regard, privileging online platforms alone over linear broadcasting would potentially undo the fund’s intention to extend audiences.

Therefore we would like the scheme to manage this carefully to ensure all content funded by the scheme is not relegated exclusively to on-demand platforms and that where content is available on-demand it is carefully optimised for visibility and linear channels are used to promote and driving traffic to content as appropriate.

We advocate that broadcaster platforms such as iPlayer, ITV Hub and 4OD are also included in the fund as this will allow more creativity in terms of format and length. In relation to arts programming it would support the creation of short form documentaries and coverage from arts events/exhibitions around the UK that might not be suitable for linear scheduling. It is worth noting that arts as a genre does relatively well on on-demand platforms when supported by linear broadcasting. Research from BARB (2015) highlights how arts is one of most popular genres to record and watch later so we would be keen to include this media as part of the scheme.

We acknowledge that changing consumption habits and the growth of digital platforms prompt the need to adapt distribution strategies to developing social and technological contexts. However, as acknowledged in the consultation document, the ‘discoverability’ or ‘findability’ of content in an online context is a significant issue, most especially in commercial platforms like Youtube. If other online platforms are incorporated, we would suggest much greater clarity about how content would be promoted and distributed in order to make sure it does not get ‘lost’ – in other words how would a destination for this content be established. Building on the New Zealand experience we would perhaps extend to these platforms as a trial in the third year of the pilot scheme. We believe this is feasible given that online content for platforms like Youtube is unlikely to need the same development time, budget or production logistics as content for broadcast.

4) Which of the following broadcasting/distribution criteria should be placed upon qualifying bids?
C. Award permitted “in principle” subject to broadcaster/platform guarantee within a particular timescale.

Assuming the focus is on broadcaster platforms (linear and on-demand), we advocate that awards are made in principle subject to broadcaster/platform guarantee within a particular timescale.

However, as we highlight in our submission to Goldsmith’s inquiry into public service television (2016), we share concerns with scholars such as Steemers (2016) that contestable funding would fail to prompt sufficient interest and innovation from commercial public service broadcasters. In this regard, we would raise concerns about this being an adequate incentive for them to engage with the fund and its content given that many of them (especially ITV and Channel 5) have largely withdrawn from their PSB commitment especially in relation to arts programming.

Our interviewees resisted scheduling quotas, as was the case within religious broadcasting in the 1980s and 1990s where specific hours in the schedule were dedicated to religious programmes. They believed (and we agree) that this ghettoised religious broadcasting leading to inconsistent programme quality and decreased budgets. However, we believe some form of monitoring of spend and distribution will be necessary, along with incentives to the broadcasters to engage with this kind of content.

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

(i) We agree broadly with the pilot model proposed. We welcome many of its proposed values around transparency, equality and innovation.

However, a number of areas of need to be clarified:

1. How will the scheme engage commercial PSBs? The model focuses mainly on the provision of content (i.e. the suppliers) but not on the demand from the broadcasters (i.e. the buyers). Can this scheme work without some kind of
quotas for commissioning and distribution as we outlined in response to question 4?

2. The metrics for assessing the success of the pilot need to be clearly outlined **at the outset** in order to ensure effective monitoring and that the fund is achieving its objectives. How will we know whether the pilot has worked (e.g. how should we judge the content; what forms of audience feedback will the fund capture)?

3. If the scheme is a success, how will the funding be maintained? We argue strongly that the **long-term burden should also not be put back on the BBC** as this will undermine the sustainability of the wider PSB ecosystem.

4. **Who will access the fund?** Will the funding only be open to independent producers and freelancers, or will external organizations (such as galleries, museums or artists in the case of arts broadcasting) be able to access the fund directly? This might encourage new voices and ideas, however the system for accessing the fund will need to be carefully considered and appropriate accountability will be needed.

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

The BFI occupy a pivotal role within the UK independent film industry in terms of funding and growth. **We make no major objection to the BFI administering the fund given its national reach and experience of distributing funding.** However, a number of things need to be considered in the administration of this particular fund.

Firstly, consideration needs to be given to **the administrative cost of putting this scheme in place**, even within an already established funding organisation such as the BFI, something the consultation document acknowledges. It seems counterintuitive and inefficient for a significant portion of the fund to go to its own administration. We believe that as much of this money as possible needs to go into making and distributing original content.
Secondly, as the consultation document recognises, we also believe that the bureaucratic burden for this fund should be light and the fund as a whole should be agile and responsive to emerging debates. A system which is cumbersome and complex will discourage new voices and plurality of provision, a key aim of this fund. It is not clear who would access the fund, but we would like to see artists and art organizations encouraged to work in collaboration with independent producers to provide innovative and new content. Working with experienced producers and independent production companies will ensure some quality in the process of production.

Thirdly, specifically in relation to the funding of arts content, geographical diversity should be a key aim. Arts television today is often dominated by large London-based organisations. One of the aims of this fund should be an engagement with and focus on arts in the nations and regions. Better geographical representation will ensure a greater diversity in the content, again another stated aim in the consultation document.

Finally, we would welcome further clarity on the decision-making process within the BFI and whether the necessary expertise is available internally given the complex nature of the fund and its aims. We would argue that the commissioning and development process for television and radio content is substantially different from that of film and the relevant expertise will be crucial.

In order to ensure high quality commissions we also advocate for subject expertise. Ideally we would like to see an expert panel put in place to assess applications. This panel would be small (to keep costs low), draw on a range of perspectives (e.g. commissioning, production, interest groups, educators and audience members) with specialisms in each of the genres in the fund (another reason to limit the number of genres). Building appropriate industry and subject expertise to assess applications will be crucial to the success of this scheme.

8) Which of the following criteria should the fund consider in respect of judging bids for funding?
We believe each of the criteria listed are important in respect of assessing bids for this funding. However, in relation to the funding of arts content specifically we believe that innovation, additionality and nations and regions should be prioritised.

- This fund should encourage **risk taking and innovation** in order to see what might work, or not work, in the longer term. One of the complaints heard during our interviews related to the conservative nature of arts broadcasting and the lack of risk-taking. While we believe that there have been a number of successful creative risks taken by broadcasters (e.g. *Green Hollow*, BBC Wales 2016; *Random Acts* Channel 4 2011 - ), we would like the fund to be a place where other creative risks can be taken by artists, producers and practitioners to ensure bold and experimental content.

- Furthermore, we believe that this pilot scheme should ensure that **the funding stretches and builds upon existing provision** rather than operating as a replacement. To this end we would advocate that Ofcom closely monitor the provision of genres in the fund on the main free-to-air channels.

- Finally, we would like to see more diverse **arts content that is geographically spread** and which allows small and medium organizations across the UK to engage fully with the production of content. Arts programming on television tends to privilege engagement with large metropolitan institutions. We would argue that this fund is an important and over-due opportunity to democratisate arts broadcasting highlighting the significant artistic works being produced and enjoyed around the country. We also welcome the consultation document’s commitment to minority language and expect to see this as an important criteria in the selection of content.

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

We strongly share the consultation’s concern with additionality and we agree fully that this fund should encourage actual growth in spend and broadcast hours. One of the intended outcomes of this scheme could be a further reduction in long-term funding by the broadcasters. We make two recommendations in this regard:
• **We would welcome on-going monitoring** of PSB genres by Ofcom including primetime scheduling. This monitoring would separate content funded by the contestable fund from traditionally funded content in order to monitor changes in the provision of both.

• We also argue for **additionality that is nuanced to the realities of the individual genres**, by using experts to identify areas *within* a genre that are not delivered in the present landscape. For example, in arts broadcasting there are many format programmes (*e.g.* *Fake or Fortune*, BBC One, 2011 -), but fewer magazine programmes dedicated to arts and culture, which allow for debate and critical discussion. Equally, documentaries about the arts tend to focus on a narrow range of art forms and artists. A commitment to additionality would see the range of art forms extended and contribute to the creation of a more rich and diverse cultural provision.

**References**


Biography and contact details

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Amy Genders is a PhD candidate at the University of South Wales, funded by the university’s centenary scholarship. My current research is primarily concerned with the future of arts broadcasting on the BBC within the context of an evolving digital media landscape, and how this in turn reflects wider shifts in approaches to public service broadcasting within an increasingly competitive market. She also has an MA by Research from the University of South Wales.

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