BBC Trust review of the BBC’s arrangements for the supply of television and radio content and online services

Response by BBC Audience Council for Scotland

The role of the Audience Council is to ensure that the voice of licence payers in Scotland is heard at the heart of BBC decision making. Discussion of the principles behind content supply does not usually occur spontaneously at audience feedback events however the BBC’s commissioning arrangements do impact indirectly on the nature of BBC content as well as directly on the creative economy in terms of the development of talent and jobs in particular localities.

However discussions at engagement events can develop from questions about content supply posed by audience members. There can be public discussion about the issues in response to news coverage of media developments like the de-commissioning of Waterloo Road. The issues do arise in discussions within the sector and with stakeholders.

In addition, members of the Audience Council have raised issues about content supply with the Trust since the inception of the Council. Members argued for a network supply strategy in 2007 and have monitored its progress, setting priorities on the topic and seeking progress reports from the Executive in Scotland and at UK level and reporting on them in their annual reviews.

Council discussions on these issues take place in the context of two audience insights. First, that the issue is important for audiences because the best programme ideas originate from producers – not from commissioners. And the nature of the ideas they originate is affected by the environment in which they live and work. Secondly, from an audience perspective, the BBC’s ultimate responsibility is to the licence payers, not to the market.

In its Annual Review for 2014, the Audience Council for Scotland noted “some evidence of improved perceptions of how the BBC represents Scotland” however it noted that survey results do not yet support this. In that Review, members said that, with the value of network commissions made in Scotland nearing £100m, more could be done to make this content representative of contemporary Scotland.

Questions

1 – Overall, are these the right principles?

The principles seem broadly appropriate. However, there is a potential incompatibility between some of the principles, for example range and diversity of supply versus maximising efficiency. And in the view of the Council, it is a significant omission that no specific requirements made on representation and portrayal in content: the language employed is
too loose ("appropriately wide range and diversity") and the Council believes this should be written in more specific terms.

2(i) – How far do the current arrangements deliver?

All are arguably being delivered to an acceptable degree on a UK wide basis although the picture may be different at a Scottish level.

From a Scottish audience perspective, Principle Three may, for now, be being achieved in terms of volume, but not in terms of representation of social, cultural and geographic perspectives. The Council believes that too small a proportion of the TV network content commissioned from Scotland is culturally-specific to the environment in which it is made.

Although the BBC has had success in meeting the volume targets set for Scotland, by the given criteria, sustainability is another matter. The loss of Waterloo Road has demonstrated the vulnerability of the process. The Council believes that only with the devolution of network budgets and commissioning powers could a critical mass be achieved in Scotland for the independent and in-house content creators, allowing network production to be a viable long-term, sustainable activity in Scotland. Independent producers have differing views but there is a school of thought that there is not a level playing field for Scottish indies in terms of network commissioning.

2(ii) – Is this likely to change, given recent market developments?

It is likely that budgetary pressures will make it ever more difficult for the BBC to maintain its support for training and there may have to be trade-offs with the volume of output which can be afforded.

As noted above, the present arrangements have not delivered Principle Three in its entirety with sustainability being a key question. The achievement of its volume targets for Scotland was dependent on a drama commission Waterloo Road migrating to Greenock but this has now been de-commissioned. The loss of Waterloo Road will now make it very challenging for the BBC to achieve its network commissioning targets in Scotland.

There is an additional issue in relation to the credibility of the quotas used to define the regional categorisation of network productions: Council members, while aware that producing Question Time in Brighton technically meet the criteria for a Scottish production, feel that in reality this series (which by its nature must produce most of its content south of the border) in not in the spirit of the exercise and cannot actually contribute in the fullest sense to the Scottish creative economy.

2(iii) – How can the principles best be fulfilled over the next decade by regulatory or other means?

The Council suggests that a much more visible link should be made between content and the social and cultural context in which it is being produced. The absence of this link damages perceptions of how well the BBC services audiences across the UK.
It is argued by some that independent producers from the Nations an especially Scotland are disadvantaged by lack of proximity to London based commissioners with who it is impossible for them the build the long term relationships which are vital for long term success. The outstanding quality of local output – produced by companies who have long term relationships with local commissioners – demonstrate that this is indeed a crucial factor. (See commentary on Principle 1 below “Securing the best ideas”)

Relocation of budget and commissioning powers for network commissioning would address both these issues.

3 – Are there genres which are exceptions?

No.

1 - Securing the best ideas

This can only be delivered if there is a level playing field for the commissioning process across the whole of the UK. Present arrangements work in favour of producers who are based in London or who have ready access to it.

Producers who have engaged with the Audience Council stress the importance of proximity for achieving commissions: the ability of a commissioner to have faith that an indie will deliver is so critical that there is a strong bias to commission only those producers with whom they have the closest working relationship. This is effectively a bias towards proximity. Where most key commissioners are based in London, as in the BBC, this means that London-based producers have an unfair advantage.

Network commissioning across the UK can therefore only take root when commissioners are physically located across the UK. The Council believes that the centralised model will always disadvantage Scotland, so there should be decentralisation. Key network commissioners should be based in Scotland with appropriate budgets devolved.

The scenario of a fully competitive environment could increase the pressure on in-house producers to develop ideas with the potential to attract commercial funding. This could have a long term effect on the nature of BBC content.

2 – Providing value for money to licence fee payers

This principle is only fully delivered where the value returned is shared equally by all licence payers as far as is practicable. Emphasis on keeping costs down – bringing into the equation factors such as marginal costs and the need to attract external funding – could have the effect of skewing the content supply strategy in favour of large metropolitan centres with easy access to facilities and international markets. This would drive economic activity towards those markets, disadvantaging regional economies elsewhere in the UK – and the licence payers who live there.

So as well as factors like efficiency and open competition, it would be beneficial to ensure that the advantages of a developing creative economy are felt across the UK, and not just
around a small number of production hubs. MG ALBA’s strategic commissioning policy for BBC ALBA has demonstrated the benefits this approach can bring in some of the areas of the UK’s most difficult of access from the metropole.

3 – Range and diversity

The Council strongly welcomes the ambition evident in this principle especially the stated outcome of reflecting different social, cultural and geographic perspectives. This should, as suggested, be balanced with value for money and quality requirements. However there are two caveats:

a) Alleged risks to VFM and quality are frequently used by the centre as blocking mechanisms to argue against decentralisation of commissioning, and this should be specifically guarded against; and

b) it is not clear why this principle is restricted to television: radio and online should also be key parts of this. Radio and online production are particularly valuable for the development of creative economies because the production models for these media are particularly conducive to the identification and development of new production talent, and - because of the low technical barriers and constraints - particularly good at developing creativity.

4 – Skills and capacity

The importance of the BBC in developing skills is even greater where critical mass is less or absent and so this function of the BBC remains of vital importance for the creative sector in Scotland.

5 – Rights and return on investment

Striking the right balance between return to licence payers via BBC rights against those of the content creator is a hard judgement to make. From an audience perspective, the predominant objective should be that funds raised by the licence fee are used primarily for the benefit of licence payers as far as market forces will permit.

6 – Separation

The desire to maximise commercial returns from content can bring the BBC’s reputation into jeopardy and this should be carefully guarded against.

*BBC Audience Council for Scotland*

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