

## Consultation response form



### Ofcom consultation on the BBCs request to change the Operating Licence

#### About us

1. Directors UK is the professional association of UK screen directors. It is a membership organisation representing the creative, economic, and contractual interests of over 8,000 members — the majority of working TV and film directors in the UK. Directors UK collects and distributes royalty payments and provides a range of services to members including campaigning, commercial negotiations, legal advice, events, training, and career development. Directors UK works closely with fellow organisations around the world to represent directors' rights and concerns, promotes excellence in the craft of direction and champions change to the current landscape to create an equal opportunity industry for all.
2. Directors UK welcomes the opportunity to respond to Ofcom's consultation on the BBCs request to change the Operating Licence. We have focused our response to the area of relevance to Directors UK members, relating to the proposed changes for non-news programmes of a national or regional interest (Section 5).

#### Response

##### **Question 3: Do you agree with Ofcom's provisional assessment and its proposed changes to the Operating Licence for Programmes of a national or regional interest? If not, please explain why, providing appropriate supporting evidence where possible**

3. Directors UK is concerned that one area that has not been considered by Ofcom is that the proposed reduction in the volume of non-news regional hours on the opt-out services from will have an impact on the employment opportunities available for freelance production roles in the nations and regions.
4. In the case of our members, television productions typically employ a principal director whose function is to hold the creative vision throughout the production process, from pre-production through to the final edit. They are the creative leads of a programme, drawing all of the creative elements together into a cohesive whole. There is typically only one principal director on a programme, in factual programmes there may be more than one director working collaboratively across a series, but generally one director has the vision for each programme or episode.

5. Reducing the volume of hours commissioned inevitably means that there will be less programmes being made in the nations and regions for directors to work on, which has the opposite effect of increasing employment opportunities for these freelancers. It is difficult for us to quantify the impact of this without detail about the programmes which will be affected. In response to Ofcom's questions about the reduction, the BBC has suggested that of the "200 hour decrease in hours of non-news programming on the BBC One and Two opt-out services each year, 90 of these hours would be developed into high impact content that would most likely be first broadcast on the network services. The remaining 110 hours represent a decrease in hours commissioned in order to fund this high impact content". In reality this could amount to 220 individual episodes/programmes if they are 30 minutes in length. Without knowing the titles it is not possible to say if this would affect a handful of directors working across multiple episodes of a series or as many as 220 directors working on individual programmes.
6. As an indicator of how many directors work across a regional strand, we have examined the example of the regional strand "*We Are England*", which the BBC has said will no longer be made. In 2022 the BBC says that this accounted for 55 hours of output, and the BBC iPlayer currently hosts 108 x 30-minute episodes. We are able to identify 39 directors working across these episodes, with some making 2-3 episodes. These 30-minute regional documentaries provide a valuable opportunity for directors to make a whole documentary programme, and to develop the essential skills required in making these. We recognise that the BBC has said in the case of current affairs that regional journalistic teams will instead work across different current affairs output across online, radio and TV, but the reduction of this output from 55 hours (120 individual programmes) to 12-15 hours (20-25 individual programmes), is a significant drop in production opportunity for directors. Our concern is that in many genre areas, a reduction in the volume of hours produced means there may not always be the possibility for talent to find other directing opportunities in the region.
7. While Directors UK has long been advocating for better budgets for programmes made in the nations and regions we are concerned that, despite the BBC's assertion that increased network tariffs will benefit regional production centres, the proposed reduction in the number of lower-budget productions as an offset of this will mean a large number of job opportunities being lost for the freelance directing community, and others in creative lead roles in the nations and regions.
8. Reducing the volume of programmes not only affects the amount of work opportunities that may be available to directors in the nations and regions, we are also concerned that reducing the number of low budget hours also has the potential to remove an important rung in the ladder of career progression for our members. There is concern that these changes may have a negative impact on the resource pool of experienced creatives and crew and that are to be found in the nations and regions.
9. Many directors learn their craft and cut their teeth working on lower budget shows, which then enable them to progress on to bigger budget productions. By reducing the number of lower

budget hours it will inevitably reduce this opportunity for directors to enter the industry, or develop their craft skills and gain production credits which enable them to progress. We know from experience that commissioners and producers tend to become more risk-averse the higher the budgets, drawing their directing talent from smaller “known” pools of established directors. As an example, with the growth in High End TV drama programming in recent years we have seen a significant reduction in mid-level drama production, which traditionally provided a stepping-stone for directors moving from continuing dramas (soaps) to bigger budget drama productions. Without this middle-tier many directors have struggled to be given the opportunity to work on productions with higher budgets as they are perceived as more of a risk, this also contributes to the pressure to secure talent able to work at the higher end. This has been highlighted in the BFI screen skills review 2022<sup>1</sup> which noted that *“that crew shortages are negatively impacting productions, which includes crew being promoted too early and without the necessary support, leading to increasing levels of stress on set”*. We are concerned that a knock on effect of creating less hours at a higher budget, will be a reduction in the pool of directing talent being drawn upon. Should the change be allowed to go ahead, the BBC must be mindful of ensuring that directors, and other crew, have the opportunity to develop their skills to progress from low budget productions, and are also given the opportunities to work on productions with higher budgets. While it should not be incumbent upon the BBC to provide these rungs in the progression ladder, Ofcom does need to ensure that the training and career development opportunities that will be lost by this proposed change in programming in the nations and regions is considered and addressed. As the Creative Industries Minister, Julia Lopez MP, is quoted in the BFI report: *‘With our film and TV industries booming like never before, it is critical that industry invests in developing the necessary skills among their workforce to continue to thrive.’*

10. In addition, in the consultation paper Ofcom has stated that: *“The change in strategy may also benefit the local production sector as a result of increased investment and opportunities for local producers to create bigger budget content for BBC network services.”* There is a concern among directors in the nations and regions that the bigger budget opportunities will mean that larger, London-centric producers will seek to win these commissions, or simply open regional hubs and then parachute in their preferred London based talent. It is important that any changes aimed at increasing network production in and from the nations and region are carefully monitored to ensure it is truly delivering opportunities for locally based talent, particularly if the overall effect is to reduce the number of available opportunities.
11. Members have also expressed concern about the type of shows that will be made in the nations and regions, and how this will impact job and career opportunities. For example, cutting regional entertainment shows in favour of high end drama, would remove opportunities for non-drama directors. It is important therefore to understand what programmes will be cut and ensure that there is a good spread of genres being created in the nations and regions. We note that Ofcom has raised their concerns about the impact on the range of genres in regional output and the BBC has stated that it is committed to continuing to produce a spread of genres in the regions, it is important that this is carefully monitored and addressed if this does not prove to be the case.

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<sup>1</sup> [BFI Skills Review 2022 | BFI](#)

We also have similar concerns as raised by Ofcom that the network driven focus for this programme strategy should not water-down the focus or representation of local life in the nations and regions.

12. If the changes go ahead, Ofcom is right to require the BBC to have transparency obligations to report the proposed changes in its annual plan and review the impact of these in its annual report, however this process will be after the event so we are not able to assess the impact on employment opportunities at this stage without the details of the programmes which will be affected. Ofcom must be prepared to step in if the reduced quota is found to be having a detrimental impact on employment in the nations and regions.

**Directors UK**  
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**[directors.uk.com](http://directors.uk.com)**