

# **Ulster Unionist Party**

Monday 17 JULY 2017

## **OFCOM Consultation response**

1 Do you agree with our overall approach to setting the operating licence?

2 Do you agree with the approach we have proposed for public purpose 1, including the high-level objectives and regulatory conditions we are proposing?

3 Do you agree with the approach we have proposed for public purpose 2, including the high-level objectives and regulatory conditions we are proposing?

4 Do you agree with the approach we have proposed for public purpose 3, including the high-level objectives and regulatory conditions we are proposing?

5 Do you agree with the approach we have proposed for public purpose 4, including the high-level objectives and regulatory conditions we are proposing?

6 Do you agree with Ofcom's approach to how we will set and amend the operating licence, as set out in Annex 5?

7 Do you agree with our proposed overall approach to performance measurement?

8 Do you agree with the proposed framework of availability; consumption; impact; contextual factors?

9 Do you agree with Ofcom's approach to how we will set and amend performance measures?

## **1 Do you agree with our overall approach to setting the operating licence?**

The BBC as the National Broadcaster does need to be subject to mechanisms by which it is held to account in the interests of both citizens and consumers.

The measures listed by Ofcom seem reasonable and fair. A key point is that the proposals are a starting point and Ofcom has the flexibility to evolve the operating licence over time.

**2 Do you agree with the approach we have proposed for public purpose 1, including the high-level objectives and regulatory conditions we are proposing?**

It is essential that the BBC's reputation for impartiality and accuracy is maintained, especially given the recent rise in 'fake news.' It is important that the UK population understands events within the UK and further afield. The BBC plays a key role in bringing the Nation together for many shared National events and the importance of this should not be under-estimated.

In a divided society such as Northern Ireland, it is absolutely key that the BBC should strive to provide accurate and impartial news. Local news and current affairs has a key role to play. We support the commitment to ensure that in each calendar year the time allocated to news and current affairs programmes on BBC One NI is not less than 310 hours and the time allocated to non-news programming is not less than 90 hours.

On a wider point, it is also vitally important that the BBC nationally reflects Northern Ireland accurately and fairly to our fellow citizens in the rest of the United Kingdom.

**3 Do you agree with the approach we have proposed for public purpose 2, including the high-level objectives and regulatory conditions we are proposing?**

Public purpose 2 is to “support learning for people of all ages.”

This clearly sets the BBC - as a public service broadcaster - apart from private sector broadcasters who are driven by ratings and advertising revenue.

The proposed high-level objectives include continuing to provide a broad range of content across BBC services providing support for all audiences to learn; encouraging people to learn about new and different subjects; ensuring it serves children of all ages; and playing an important role in education and learning in the UK through partnerships with educational, cultural and sporting organisations.

These objectives have our full support.

**4 Do you agree with the approach we have proposed for public purpose 3, including the high-level objectives and regulatory conditions we are proposing?**

We welcome Ofcom's commitment to the amount of original productions and supporting the BBC in risk-taking by commissioning output from a range of organisations and a wide-range of independent producers.

In relation to radio services we support proposals to promote UK talent - particularly new UK acts – on Radio 1 and Radio 2 and to broaden sports coverage to better support those sports which currently receive less broadcast coverage.

With regard to Northern Ireland we note and very much welcome the requirement that in each calendar year 'at least three per cent of the hours of Network Programmes made in the United Kingdom are made in Northern Ireland.' Excellent dramas have been made in Northern Ireland recently, including *The Fall* and *Line of Duty*, and there is no doubt that we have the talent and the locations within Northern Ireland to produce quality programmes that can be enjoyed by National audiences throughout the UK and beyond.

**5 Do you agree with the approach we have proposed for public purpose 4, including the high-level objectives and regulatory conditions we are proposing?**

As a Northern Ireland based political party, public purpose 4 – ‘to reflect, represent and serve the diverse communities of all of the United Kingdom’s nations and regions, and in doing so, support the creative economy across the United Kingdom’ is very relevant to us.

The BBC has been seen as an organisation was too London-centred in terms of personnel, production and how it viewed the UK. This has been mitigated in recent years by the transfer of a great deal of BBC services to Media City in Manchester, but we want to ensure that Northern Ireland is not forgotten about or regarded as remote.

We want to ensure that programmes are made here, and that Northern Ireland voices are heard nationally. We therefore support Ofcom’s proposed high level objectives to accurately represent and authentically portray all audience groups from the nations and regions; and distribute production resources across the UK, ensuring it supports the creative industries in the nations and regions.

**6 Do you agree with Ofcom’s approach to how we will set and amend the operating licence, as set out in Annex 5?**

The proposals stated by Ofcom in Annex 5 appear reasonable.

Before setting a Licence, Ofcom must consult the BBC and any person Ofcom considers appropriate. We welcome the acknowledgment that where setting a new licence, including replacing an existing licence, Ofcom “would generally expect that it would be appropriate to consult publicly on its proposals.”

Ofcom also says that in setting a new licence or amending an existing one, it will take account of all views and information supplied and a key point is that Ofcom will “have regard to the enforceable nature of operating licence conditions and the desirability of ensuring that regulatory conditions are clear and capable of enforcement in the event of non-compliance.”

This seems to be good basic common sense.

## **7 Do you agree with our proposed overall approach to performance measurement?**

In any walk of life, it is obviously essential to have a set of indicators against which to measure performance so that success or failure can be assessed. This is as true of the BBC as any other corporate body or individual

It is vital however that the indicators are fair and realistic and we agree with Ofcom's approach that a 'rigorous and flexible approach; is required.

We agree that the existing research base offers a good starting point, not least the Public Service Broadcasting (PSB) which has been run annually since 2007.

Ofcom also list other reviews and surveys and a proposal to put in place a 'bespoke programme of regular evidence-gathering and audience research to ensure that the BBC's performance is tracked robustly and publicly.

It must also be fair and reasonable and actually do what it is intended to.

**8 Do you agree with the proposed framework of availability; consumption; impact; contextual factors?**

These four performance measures seem reasonable to us. We are certainly open to them being modified and improved as a result of the consultation process.

**9 Do you agree with Ofcom’s approach to how we will set and amend performance measures?**

The key point in relation to this is that the measures are fair and reasonable and that should also apply to any amendments.

We welcome the statement that “before determining performance measure, the BBC and Ofcom respectively must consult each other and any person they consider appropriate.

Ofcom commit to giving a reasonable period of time for consultation and to taking account of all the views and information supplied.

Taken together, these two statements seem a reasonable approach.