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**Forename:**

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**Representing:**

Self

**Organisation (if applicable):****What additional details do you want to keep confidential?:**

No

**If you want part of your response kept confidential, which parts?:****Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Additional comments:**

RESPONSE TO OFCOM'S THIRD REVIEW OF PUBLIC SERVICE BROADCASTING

As ever, Ofcom reports provide a rich field of data.

I have been particularly struck by the apparent desire of respondents surveyed to see more original and innovative content, and by the figures which show that there have been declines in, for example, original drama and children's programming spend. Although the report notes that there is continuing high satisfaction with PSB, that satisfaction does not apparently extend to the ways in which the different cultures across the UK are reflected.

The report does acknowledge that PSB is vulnerable to any diminution in financial resources available, whether to those channels paid for by advertising or to the BBC.

Ofcom assumes that the BBC will continue to be funded at current levels. I do think

something needs to be said about the quite extraordinary decision by the BBC, in response to demands made by the current government at the outset of its term of office, to take on the responsibility for financing several activities - such as the World Service - previously paid for directly by the government, or in other ways. That this development was not subjected to full parliamentary scrutiny, coming as it did in the middle of a licence fee period, is remarkable. There is a strong case for arguing that it ought to be revisited. One suspects that the Corporation's profligacy with management salaries and payoffs made it vulnerable to the government's demands in a way that might not have been the case otherwise. Given that the current Director General has gone some way to address the issue of over-payment, it should be possible to suggest a reconsideration, the ultimate aim being that the licence fee finances the BBC's domestic radio and television services and very little else besides.

It would be perfectly reasonable for conditions to be attached to such a settlement, included among which would be requirements to increase, for example, original children's programming and to offer a much wider range of contemporary drama that is currently provided on television. It is in the drama field that the failure to reflect the different cultures of the UK is very clear; having members of ethnic and national minorities in the ubiquitous crime and hospital series does not properly address this need.

Ofcom is in an excellent position to argue from the data it collects and collates that the licence fee adjusted for inflation remains a remarkable bargain - for radio and television channels - when it is compared to the cost of subscription services.

Dealing with the potential threats to ITV and Channel 4 from a possible decline in advertising revenues is a trickier problem, not least because the kind of enlightened dirigisme under which, for example, William Whitelaw, the Conservative Home Secretary, established Channel 4, is so out of fashion. It does not seem to me that a further increase in the amount of advertising on these channels is desirable - and indeed there are EU rules to take account of in the matter. It may well be sensible to look abroad for situations where commercial operators are required, through levies, to finance indigenous programming. The Canadian approach, for example, which admittedly is not without its difficulties, does merit some examination.

It may also be the case that the time has come for the level of the licence fee to be set not by the government of the day but by an independent body of some sort, to which representations might be made not only by broadcasters and government but also by civil society groups.

Scottish based commentators ought not to overdo their gurning ('complaining') about how the country - and the other nations of the UK - is/are represented, but there is still a long way to go. If we take the example of pan-UK news broadcasting on the major television channels, it ought to be possible at the end of each week for a regular viewer to have seen reports on events in Wales, Northern Ireland, Scotland and the non-metropolitan areas of England. It would be foolish to demand that every bulletin is obliged to carry such items, and of course in times of major crisis, attention has to be largely focussed on the events in question. However in 'normal' times it should be possible to ensure that enough material is contained in these bulletins to ensure that, wherever we are viewing, we are reminded each week that we live in a state which is composed of several nations and regions, all of which have a crucial interest in understanding each other. That necessity was surely demonstrated during the 2014 Scottish referendum campaign: several commentators have argued convincingly that not nearly enough attention was given to it at the UK level until the very last stages of the debate, so that

the ultimate result must remain perplexing to many people elsewhere in Britain.

David Hutchison, Honorary Professor of Media Policy, Glasgow Caledonian University.

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**Question 1: Do you agree with our assessment of the context in which the PSB system operates, and how the trends identified might affect the PSB system? In particular, do you agree with our analysis of the independent production sector:**

See general response above.

**Question 2: Have we identified the key differences in Northern Ireland, Scotland and Wales?:**

**Question 3: Do you agree with our assessment that the PSB system remains strong overall?:**

**Question 4: Given the resources available, to what extent is the system meeting the needs of as wide a range of audiences as practicable?:**

**Question 5: Given the resources available, does the PSB system deliver the right balance of spend and output on programming specifically for audiences in Wales, Scotland and Northern Ireland and programmes reflecting those nations to a UK-wide audience?:**

**Question 6: Is declining investment affecting the quality of PSB and is it a cause for concern?:**

**Question 7: Do you agree with Ofcom's provisional findings in the Review of C4C's delivery of its media content duties?:**

**Question 8: To what extent do you agree with our assessment of the degree to which the non-PSB services play a role in helping to deliver the public service objectives? In doing so please set out your views on the delivery by the PSB portfolio channels, other non-PSB channels, on-demand and internet services and also radio services separately.:**

**Question 9: How likely are we to see steady evolution and have we identified all of the potential alternative scenarios and risks to the system?:**

**Question 10: How might incentives to invest change over time?:**

**Question 11: Have we identified all the relevant ways in which the PSB system might be maintained and strengthened?:**

**Question 12: Does universal availability and the easy discoverability of PSB remain important and how might it be secured in future?:**

**Question 13: Should we explore the possibility of giving greater flexibility to PSB institutions in how they deliver public service content, including examining the scope (in some or all cases) for regulating by institution, not by channel?:**

**Question 14: Do the current interventions in relation to the independent production sector need to change in light of industry developments?:**

**Question 15: Have we identified the right options when considering potential new sources of funding, are there other sources of funding which should be considered, and which are most preferable?:**