



## OFCOM CONSULTATION ON NATIONS & REGIONS: BECTU RESPONSE

1. BECTU is the trade union for workers (other than performers and journalists) throughout the broadcasting and independent production sectors. We have a strong interest in Ofcom's PSB Review and have made submissions at all previous stages. With significant numbers of members working in the commercial broadcasting sector in Scotland, Wales and Northern Ireland, as well as the English regions, we have a clear interest in the issues raised.

### **Q1 A/B/C: Proposals for Non-News Programming in Scotland/ Wales/Northern Ireland until the first UK region switches to digital**

2. At previous stages of the PSB Review, BECTU has strongly opposed the proposals, now being implemented, for significant reductions in programming for the English regions (to 1.5 hours per week). By comparison with this, the proposed 4 hours per week for the nations is to be welcomed – and reflects the strong cultural, political and audience arguments for such programming (as demonstrated in Ofcom's own research published in 'Reshaping television for the UK's nations, regions and localities').
3. It remains the case, however, that there has in recent years been a downward trend in non-news output in the nations – as measured both in hours and in spend. Ofcom's proposals still, on our calculations, result in a further reduction of 0.5 hours per week in non-news output. While representing an improvement compared to the English regions (and indeed compared to earlier proposals from SMG), the overall context for non-news programming in the nations remains, in our view, problematic and unsatisfactory.
4. We therefore wish Ofcom to give a strong indication to SMG, to ITV Wales and to UTV that they are required and encouraged to make a long term commitment to investment in high quality regional programming – with particular attention to maintaining and developing in-house staff and facilities at the requisite level. In our view one of the key tests of the companies' long term commitment to such programming will be their retention of in-house staff at sufficient levels to guarantee regional output – rather than any increase in external commissioning, which can all too readily be reduced at a later stage.

#### **Q1 D: Reduction in Non-News Programming once the first UK region achieves digital switchover**

5. It follows from our response to Q A/B/C that we are not in favour of the further proposed reduction to 3 hours per week after switchover. We believe this maintains the longer term downward trend and could be taken as a signal that yet further reductions are inevitable in the longer term.
6. We believe 3 hours per week takes the companies very close to the lower level of the critical mass necessary to justify adequate investment in staff and other resources for non-news regional programming. In contrast, we believe Ofcom should give a clear message that there is a long term future for such programming in the nations – rather than simply a slightly slower pace of retreat than in the English regions.

#### **Q1 E: Reduction in Non-News Programming in the English regions after digital switchover**

7. As already indicated we have been and remain strongly opposed to the reductions proposed and implemented in the English regions. The current proposal for 0.5 hours per week post switchover means that ITV's long term commitment in this area will be notional. In practice, Ofcom has signalled its acceptance of the ending of non-news regional programming in the English regions, and with it one of the defining characteristics of ITV. We believe based on our previous arguments, that this is neither desirable nor justifiable.

#### **Q2: ITV Networking Arrangements**

8. We support the proposed 'no-play, no pay' clause and the requirement to take account of higher regional programming in the nations when devising the network schedule.
9. We believe the scheduling proposal should be applied with a due degree of flexibility to allow, for example, UTV to continue to broadcast a strong regional programme such as 'Kelly' at a time which would normally be taken by network programmes.

#### **Q3: News**

10. We are not opposed in principle to the specific proposal concerning SMG (ie loss of the 2 pm bulletin but development of a tailored 10.30pm bulletin) – as long as the overall amount of local news (and requisite in-house resources) is not thereby reduced.
11. On the general proposal for tailored 10.30pm news bulletins for the nations, we would support this in principle as long as this led neither to

reductions in local news resources nor to any reduction in ITN news resources).

#### **Q4: Indigenous language broadcasting**

12. In relation to **S4C**, we note Ofcom's three options: the status quo (with revised arrangements with the BBC); incorporation into the BBC; a Welsh-language PSP for Wales. Our response to these is set out in summary form below. We can provide more detailed views on S4C if required.
13. We favour the status quo as the preferable model for the foreseeable future of Welsh-language broadcasting. S4C is a unique experiment which has demonstrably worked and which has contributed to the development of a broader audiovisual production and facilities sector in Wales than would otherwise have been the case.
  - We do not, however, support the proposal for an eventual diversion of part of the BBC licence fee to S4C. We believe such resources will continue to be needed for BBC Wales.
  - We accept that there are concerns about funding pressure on S4C beyond switchover. Just as with Channel 4, we believe these may need to be addressed through additional public funding (which we believe should continue to be provided directly from DCMS rather than via the Welsh Assembly). We further believe that S4C's role in developing digital broadcasting should be recognised in the form of a one-off payment for the cost of DTT transmission roll-out.
14. We agree with Ofcom that incorporation into the BBC is not an attractive option. Maintaining a plurality of broadcasters is desirable on cultural, political and language grounds. There is the additional risk that incorporation could in the medium term lead to a reduction of resources for Wales because of broader corporate priorities.
15. We have, in our response to Stage 2, already set out general arguments against a freestanding PSP. We take a similar view in relation to the proposed Welsh language PSP ie we already have – in S4C – a dedicated public service broadcaster which is best placed to fulfil this remit. Any likely alternative runs the risk of a loss of focus (owing to broader corporate priorities), to increased commercial considerations (to the detriment of the remit) and to unnecessary and costly bureaucratic complexity (arising from the bidding process and from subsequent regulatory measures).
16. In relation to the sections on Gaelic broadcasting in Scotland and Irish-language broadcasting in Northern Ireland, we have no specific objections, amendments or additions to propose at this point. We would hope that SMG's contribution to Gaelic programming can be maintained in the short-term, while assisting in the development of a Gaelic channel in the medium and long term (with the option of such a channel commissioning some programming from SMG)

## Conclusion

14. We hope our views will be taken into account and we look forward to Ofcom's findings on these issues in the near future.