

Media Policy Briefing Papers



Issue No. 1
The Future of the BBC

by
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Dr. Andrew Hill and Dr. Aphra Kerr

THE FUTURE OF THE BBC:

A summary of the Department of Culture,
Media and Sport 2005 Green Paper

with a response from the Policy group
of the Centre for Media Research
University of Ulster

[http://www.bbccharterreview.org.uk/gp_responses/organisations/
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No. 1 in an occasional series of policy papers produced
by the Policy Group of the Centre for Media Research

by

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INTRODUCTION

This series of papers has been produced by the Policy research group, of the Centre for Media Research at the University of Ulster, Coleraine, Northern Ireland.

The Centre aims to provide an informed voice on contemporary matters of public concern, including the maintenance of national and regional cultures in the face of media globalisation, and to contribute to the public policy agenda in Northern Ireland, the UK and beyond.

As part of its brief, the Policy group reviews and summarises topical issues of media policy and these summaries are published in these briefing papers. The first of these papers concerns the future of the BBC, and includes the response made by the CMR to the British Government's 2005 Green Paper on this question. Future papers will include reviews of the 2004 Freedom of Information Act; a review of Media Literacy policy and provision in Northern Ireland; and a review of the issues arising from a CMR seminar in April 2005 on children, media and conflict.

The group welcomes feedback on any of these papers, and if there are further media policy issues that you feel should be discussed, reviewed, researched, or disseminated, please let us know. The papers are published both as online documents, downloadable from the university website, and in hard copy. If you would like a hard copy, please contact Barbara Butcher at ba.butcher@ulster.ac.uk

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1. INTRODUCTION

Since 1927 the BBC has been governed by a Royal Charter, and as the end of the eighth one approaches, the Government has published a Green Paper on its strategy for the forthcoming ninth Charter. The period of the last Charter, 1997 to 2006, witnessed massive changes in the telecommunication industry, evidenced by the almost doubling of TV channels to over 400 and a near 50% increase over the last decade of radio stations to 325. These trends have been accompanied by the increasing use of the Internet for TV and radio programmes and the development of the BBC's digital provision.

This summary will focus on six broad areas of the Green Paper. The first two concern the existing arrangements for the governance and financing of the BBC, and the structural changes that the Government proposes. By 2012 it is expected that the UK will totally have phased out analogue broadcasting in favour of digital and other formats. The BBC's role in this 'switchover' process will be the third area of discussion. Though the BBC has a specific responsibility for it, Public Service Broadcasting (PSB) is a concept not exclusive to the organisation. Both the concept and the BBC's role will form the basis of the discussion in the fourth area. Much of the language and concepts in the Green Paper are not as precise as they perhaps could be, and the implications of this for policy-making are discussed in the penultimate section. The final area of discussion is that of the financial implications of the reforms set out in the Green Paper. In addition to these six discrete areas there is a section on the possible themes that could be discussed in any CMR response.

2. EXISTING GOVERNANCE AND FINANCIAL ARRANGEMENTS

The BBC is governed by a Royal Charter that effectively makes it a semi-autonomous organisation, nominally free from state intervention during each Charter period. The Board of Governors is responsible both for the day-to-day running of the BBC and making sure it is accountable to the licence fee payers. The licence fee is currently £126.50 per annum for a colour TV, £42 for a black-and-white one. In the financial year 2003-4, the fee generated £2.8 billion (£408 million of this total came from the Department for Work and Pensions as compensation for free licences for people over 75 years of age). As well as the latter, there are a number of other concessions, namely a 50% Blind Concessionary Licence and the ARC (Accommodation for Residential Care) for residents in residential care, including sheltered housing. The costs

associated with collecting (including the pursuit of non-payers) the licence fee amount to £300 million. In order to finance the expansion of its digital services, since 2000 the licence fee has risen in real terms by over 1.5% per year.

The corporation is also subject to internal and external guidelines and regulations in the form of the BBC's Fair Trading Commitment. While the corporation itself is responsible for the administration of its internal rules, Ofcom has responsibility for external competition regulation relevant to the BBC. The BBC is compelled to source 25% of its output from independent producers, a commitment that is monitored by Ofcom. However, the BBC has failed to meet this quota in two of the last three years.

One of the largest and most respected of the BBC services is the World Service. Unlike the rest of the corporation, it is funded directly through the taxpayer in the form of grant-in-aid from the Foreign and Commonwealth Office (FCO). The present level of funding is £225 million per year, rising to £239 million in 2005/6. The BBC's international websites are financed through a combination of the licence fee and the World Service's grant-in-aid; all foreign language internet content is provided by the World Service.

NEW STRUCTURE OF GOVERNANCE

When the present Charter ends on 31 December 2006, it is proposed that it will be replaced by a new ten-year one, running from 1 January 2007 to 31 December 2016. The suggestion by the Culture, Media and Sport Select Committee that the BBC should be established by an Act of Parliament was rejected, as it would bring the BBC closer to Government and Parliament and make its budget subject to the annual spending round. There was, however, an acknowledgement that some sort of structural change is needed to release the BBC Governors from their dual, and often conflicting, roles of running the BBC and holding it to account. This has been addressed by the proposal to replace the Governors with a two-tier management structure: a BBC Trust (a working title) and an Executive Board. The latter will be responsible for the day-to-day running of the BBC, while the former (to which the Board is accountable) will perform a monitoring role to ensure that the BBC is made fully accountable to the licence fee payers. This link to licence fee payers will be through various forums, like the existing broadcasting councils, and with the

use of qualitative and quantitative research. Furthermore, the appointment of the trustees will be subject to Nolan procedures.

The Trust will draw up individual licences for every single BBC service, creating a working framework within which the Executive Board will operate. These licences will be accompanied by strategies, published by the Trust, highlighting how they will meet the BBC's public purpose. New services can only be added after being subjected to a public value test and a market impact assessment. These tests would be designed by the BBC and Ofcom, with the latter itself taking responsibility for the testing process. Provided these procedures have been observed, the Trust is ultimately responsible for the introduction of new services; the Secretary of State theoretically only can intervene if these procedures have not been followed. The Trust can also dismiss the Director-General or the head of the Executive Board and, through the budgeting process, can insist that money is moved from some services to others.

THE 'SWITCHOVER' TO DIGITAL BROADCASTING

It is the view of Ofcom that the 'switchover' from analogue to digital broadcasting should start in 2008 and end by 31 December 2012. This is within the period of the next Charter, and the BBC will take the leading role in ensuring that the transition is smooth. This will involve some financial commitment by the BBC, particularly in executing a comprehensive communications strategy and in providing money to those who have practical difficulties in making the 'switchover'. This new digital provision should be as comprehensive as existing analogue provision, in other words covering around 98.5% of households. There is also a separate target for the provision of DAB radio: 90% coverage of the UK population.

PUBLIC SERVICE BROADCASTING (PSB)

The BBC takes the lead in Public Service Broadcasting (PSB) – of the total amount spent on PSB of £3.4 billion per year, the licence fee generates nearly £3 billion for the BBC. Commercial broadcasters too, notably Channel 4 and Channel 5, have a substantial PSB provision. The existence of this alternative provision places on the BBC a responsibility to complement rather than compete with commercial broadcasters when delivering PSB. This commitment to PSB also means that the BBC should not enter into bidding wars with commercial broadcasters for expensive imports except where no

other terrestrial broadcaster is interested in showing the programme or where it would be in the public interest for the BBC to secure the programme.

The Green Paper argues that there is a real danger that after digital 'switchover', commercial broadcasters may not devote as much time to PSB. Given the importance it attaches to the BBC having healthy competition for PSB, it floats the idea of providing some financial assistance, possibly from the licence fee, to the main commercial PSB provider, Channel 4, specifically for digital 'switchover'. Ofcom has suggested that a Public Service Publisher should be created to explore the possibility of using digital technologies to broadcast content in a much wider variety of formats. Although this issue cannot seriously be considered until 'switchover' has begun, the BBC welcomes more information from Ofcom on its proposal and, more generally, will review the future of PSB near the end of the 'switchover' process.

THE PROBLEMS OF DEFINITION

One of the main concerns regarding this document is the often imprecise use of language. For instance, the Trust will only approve licences for new services 'where it judges public value exceeds market impact' while simultaneously conceding that the methodology for determining this does not presently exist. Similarly, Ofcom monitors the BBC for the rather nebulous concept of 'fairness' rather than 'accuracy and impartiality'. It would be an extremely useful exercise if the BBC more precisely defined what it means by terms like 'public value' and, importantly, what are the criteria needed to determine the virtues of public value and whether these are sufficient to over-ride concerns about market impact. Given that there are economic models that can be used to measure 'market impact', the suspicion is that these will be deemed to be more 'scientific' than the 'public value' test and hence that economic concerns will, more often than not, over-ride concern for the wider public interest.

THE FINANCIAL IMPLICATIONS OF REFORM

The BBC's own value-for-money review has identified efficiency savings that will reach £320 million per year by the third year of any cost-cutting programme. The plan is that this will be achieved through a 25% reduction in the cost of professional services (including finance, procurement, human resources, strategy, policy and marketing), 15% savings in output areas (radio and music, TV, new media, Nations and regions), and a further 15% in cost-per-hour

prices for commissions from all suppliers. These measures are supported by the Government. The Green Paper does not have that many detailed proposals to achieve these reductions, but does advocate the selling off of the corporation's support services (production businesses and broadcast services). There is also a proposal to re-structure the BBC's publishing arm, selling off its book publishing operation, making sure that it produces magazines only that are specifically linked to individual programmes, and a consideration to draw up a licensing agreement with a third party in order to boost the current annual profit of £17 million. There is also a more general commitment to consider raising the current 25% for independent producers by another 25%, but given that the BBC finds it difficult to reach the existing target, it is questionable whether major savings can be made here. The BBC's World Service will not be given any additional funding and will be expected to develop its tri-media programme (radio, TV and Internet) through efficiencies in its existing budget, even if that means a reduction in vernacular radio services.

Against these proposed reductions are a number of uncosted commitments, such as the proposal that the BBC uses the licence fee to fund a number of technical and promotional initiatives relating to the 'switchover', and the possible future funding of PSB of terrestrial broadcasters outside the BBC. The 1.5% above inflation annual rise since 2000 is as a result of the expansion of digital services, and hence is not likely to come down as the BBC approaches 'switchover'.

ISSUES TO CONSIDER IN RESPONSE

The change in governance of the BBC is to be welcomed, but the exact relationship between the Trust, the Executive Board and Ofcom will need to be clarified; in particular, it is not clear how the proposed Trust will be more accountable to the public than the existing Board of Governors.

The elevation of 'market impact assessment' to parity with the 'public value' smacks of a disproportionate level of concern for the interests of commercial broadcasters. It must be remembered that the BBC is compelled to allot a substantial amount of its radio and TV airtime to independent producers and could, if there are concerns that PSB in the commercial sector will decline after 'switchover', directly subsidise commercial media organisations through the licence fee.

Given that it costs £300 million to collect every year, the existing licence fee arrangement must be discussed. While subscription will endanger the universalism that is sustained by the fact that every TV owner is obliged to pay the licence fee, other options should be considered, chief of which is direct Government funding. While it could be argued that this would make the BBC vulnerable to both political and financial pressures, through its constitutional link to the Government of the day and its subjection to the annual spending round, this is no different from other cultural and educational institutions; it is not clear that BBC's Charter status has prevented it from being subject to state censorship at various times throughout its history. Funding the BBC out of general taxation would mean a financial regime based on ability-to-pay and savings of £300 million a year on collection costs.

In general, there needs to be more detail on how the proposed cuts will impact on the BBC as an organisation and, more importantly, on quality. Given that the BBC only generated £38.5 million last year in profit through its commercial services and that it could not achieve its 25% quota for independent production in two of the last three years, it does not seem that the organisation will be able to make much money through internal commercial activity or many savings through the use of external commercial organisations. In light of this, there must be some concern that the bulk of the £320 million a year of savings will have to come from elsewhere. Overall, there seems to be far too much emphasis on cost-cutting and too little on the impact that this will have on the quality of the BBC's output. For instance, the rationalisation of the World Service and the suggestion that the BBC Internet archive may be commercialised appears to run counter to the BBC's commitments to 'bring[ing] the UK to the world and the world to the UK' and 'building digital Britain'.

There could have been much more discussion on the way in which new technologies will transform our viewing habits. At the moment, it is possible to watch archived versions of (mainly) TV and radio news broadcasts and current affairs programmes over the Internet. There is no technological reason to halt the trend towards watching broadcasts over the Internet, but there is little discussion in the Green Paper about the Government's future plans in this area.

APPENDIX

THE CMR'S FORMAL RESPONSE TO THE DCMS'S CHARTER REVIEW CONSULTATION

Introduction

We, the Centre for Media Research at the University of Ulster at Coleraine (<http://www.arts.ulster.ac.uk/media/cmr.html>) are offering a response to the Green Paper in our capacity as a group of scholars who are publicly funded by the UK Government, as well as by other funding bodies, to carry out research and to comment on aspects of media and broadcasting policy. The Centre for Media Research welcomes the Green Paper on the BBC and, in particular, the Government's proposal that the Royal Charter should be renewed for a further ten years. Our detailed comments are below and we hope they are helpful. However we want to stress at the outset that we would have liked more emphasis on the regional and national aspects of broadcasting. From our own perspective, we are concerned that Northern Ireland is hardly mentioned in the paper; the BBC's promotion of Irish language broadcasting over the last decade and the plans for its future development are thus inexplicably omitted. The 1998 Belfast Agreement commits the Government to promoting both the Irish language and Ulster Scots, and the Green Paper should reflect this. The other nations and regions of the UK may have well similar concerns.

Governance

While generally we agree with the principle of re-structuring the governmental structures of the BBC, we would like more clarity about how this is to be achieved. The role and responsibilities of the BBC Trust (and we accept that, for the moment, that is merely a working title) are not clearly explicated, nor is the nature of the relationship between it, the Executive Board and Ofcom. The proposed composition of and appointment procedure for both the Executive Board and Trust need to be further explored; it is our view that the licence fee payers and BBC employees need to be represented formally on the Trust. The Government must also make sure that any provisions to replace Trust members must be counter-balanced by procedures to protect those members from becoming victims of arbitrarily wielded power.

Ofcom's regulatory role

We are not convinced that Ofcom has a role to play as a regulator of the BBC,

due to its lack of expertise and its unrepresentative nature. The role of Ofcom needs to be considered in conjunction with the various requirements for public value being laid down for the BBC; it also must discharge its duties in relation to commercial broadcasters as diligently as it does in relation to the BBC.

Funding

The BBC is currently funded through a licence fee and there is a debate about whether or not this should continue. Critics of this arrangement argue that the licence fee constitutes a regressive form of taxation. Also, it costs £300 million to collect every year, money that could perhaps be better spent elsewhere. While subscription will endanger the universalism that is sustained by the fact that every TV owner is obliged to pay the licence fee, other options could be considered, chief of which is direct Government funding. While it could be argued that this would make the BBC vulnerable to both political and financial pressures, through its constitutional link to the Government of the day and its subjection to the annual spending round, this is no different from other cultural and educational institutions; it is not clear that BBC's Charter status has prevented it from being subject to state censorship at various times throughout its history. Funding the BBC out of general taxation would mean a financial regime based on ability-to-pay and savings of £300 million a year on collection costs.

Others argue that though the present levy is viewed by many as a regressive tax, it is so small that it does not have the same political impact that, for instance, the poll tax had. According to this reasoning, it seems to be the least worst option for funding for a public service system and has the advantage of being a system that people are already used to, with an existing infrastructure. The attempt to relate it to greater or lesser audience shares does not really address the issue. The key relationship between the license fee and the public is the fact that, for a very small outlay, every member of the British population has free access, at any time, to all the BBC's main services – not just TV but radio, online, and educational services - for the price of the license fee. This represents really excellent value for money. The BBC also represents public value in the form of its international and national reputation; it is highly regarded for the quality of its programming; for the perceived integrity of its journalism and for its trustworthiness as an institution. Although there are problems with its organisation and with its relationship to new technology and new channels, these do not undermine the basic public value of the institution and of its

relationship with its constituents – who are not consumers, but citizens and (in the case of children and young people) potential citizens.

These are essentially the only viable funding options. Given the concern that subjection to the annual spending round will imperil both the financial and editorial autonomy of the BBC, we endorse the continuation of the present regime.

The impact on quality

We do, though, have grave concerns about the proposed programme of ‘efficiency savings’. In general, there needs to be more detail on how the proposed cuts will impact on the BBC as an organisation and, more importantly, on quality. Given that the BBC only generated £38.5 million last year in profit through its commercial services and that it could not achieve its 25% quota for independent production in two of the last three years, it does not seem that the organisation will be able to make much money through internal commercial activity or many savings through the use of external commercial organisations. In light of this, there must be some concern that the bulk of the £320 million a year of savings will have to come from elsewhere. Overall, there seems to be far too much emphasis on cost-cutting and too little on the impact that this will have on the quality of the BBC’s output. For instance, the rationalisation of the World Service and the suggestion that the BBC Internet archive may be commercialised appears to run counter to the BBC’s commitments to ‘bring[ing] the UK to the world and the world to the UK’ and ‘building digital Britain’.

Use of language, evidence and statistics

One of the main concerns regarding this document is the often imprecise use of language. For instance, the Trust will only approve licences for new services ‘where it judges public value exceeds market impact’ while simultaneously conceding that the methodology for determining this does not presently exist. Similarly, Ofcom monitors the BBC for the rather nebulous concept of ‘fairness’ rather than ‘accuracy and impartiality’. It would be an extremely useful exercise if the Government more precisely defined what it means by terms like ‘public value’ and, importantly, what are the criteria needed to determine the virtues of public value and whether these are sufficient to over-ride concerns about market impact. Given that there are economic models that can be used to measure ‘market impact’, the suspicion is that these will be deemed to be more

‘scientific’ than the ‘public value’ test and hence that economic concerns will, more often than not, over-ride concern for the wider public interest.

As a group of professional, academically-trained researchers, we would obviously like to see policy underpinned by methodologically rigorous, independent research. The Green Paper does not give much reassurance on this point. In the Paper, statistics are used quite widely but the source of these statistics is often not specified. Before attaching credence, or otherwise, to the claims stemming from these statistics, we need to know the size and composition of the sample, and the circumstances in which the surveys were carried out. Evidential-based policy-making is to be welcomed, but we are not convinced that the Green Paper has addressed this adequately.

Education, training and research

The list of people who are deemed to have an interest in the BBC and thus useful respondents (see page 18) should include people like the staff of our Centre: we too are publicly funded. We study, teach and do research on broadcasting, again with public funding, and we represent a resource that should be used as widely as possible. We certainly agree with the publication of all BBC-commissioned research – something that has not happened in the past.

Generally, we would like to see closer links being developed across the educational and training sector both inside and outside the industry. With regard to the recommendation that the BBC should establish a ‘college of journalism’, there is a danger that this could be another example of reinvention of wheels; there are a number of existing colleges of journalism with educational infrastructures such as libraries, trained teaching staff and expertise, all rigorously validated by the Quality Assurance system for Universities and by professional validating bodies such as the National Council for the Training of Journalists. Broadcasting training should work hand in hand with publicly funded educational institutions in order to maximise public value – a point we have made earlier. See also the point on page 36 about working with ‘appropriate partners in the educational community.’ As members of this community, we warmly welcome this. It should also be remembered that BBC journalists are not only BBC journalists but may work in other institutions at different points in their careers.

Myth of choice

Section 1.8 claims that: ‘viewers now have far more choice.’ Some viewers (still not all) certainly have access to more channels but not necessarily access to more diverse programming or genres. There is a need for a professional content analysis to show the relationship between the extension of the number of channels and variations in the provision of range of genres, similar to the BSC study on children’s provision (Davies and Corbett, 1997) which showed a decline in factual, home-grown drama and preschool programming, and a massive rise in imported animation as more channels were introduced – in other words, less ‘choice’ of programme diversity.

Archives, access and market impact

Responsibility to serve the public should include publicly accessible archives and protection of ‘fair use’ in terms of being able to quote material without having to pay for it, for educational purposes. We are concerned that while the Green Paper accepts that the development of a ‘creative archive’ of old programmes for viewing on the Internet would be popular, it should be subject to ‘public value’ and ‘market impact’ tests. More generally, why has market impact been mentioned alongside public value as if they were equivalent? If the market impact of a BBC service ‘risked foreclosing a new market or significantly lessening competition’ why should this be a problem? Suppose that denying this service to protect competition reduced public value (as it well might): what then? We argue that public value is the primary consideration for a publicly funded broadcaster, not market competition. For further discussions of this, see the criticisms made about CBeebies and CBBC by Nickelodeon in Patrick Barwise’s and Máire Messenger Davies’s report for the DCMS about the BBC’s digital children’s services (<http://www.culture.gov.uk/NR/rdonlyres/FC4F238B-AA7B-420C-A5D5-B11AE413C195/0/SupplementaryReportonCbeebiesandCBBC.pdf>).

If Nickelodeon, an international, US-based commercial organisation, were to suffer from market encroachment by CBeebies, this would not be a reason to deny British parents and children access to this high quality service.

Children’s TV

We believe that children’s programming should form one of the BBC’s protected and valued categories.

TV audience behaviour

There could have been much more discussion on the way in which new technologies will change our viewing habits. At the moment, it is possible to access archived versions of (mainly) TV and radio news broadcasts and current affairs programmes over the Internet. There is no technological reason to halt the trend towards watching broadcasts over the Internet, but there is little discussion in the Green Paper about the Government's future plans in this area.

That said, it is also worth making the point that it is difficult to predict the precise effect that technological innovation will have on viewing behaviour. This is another claim for which evidence in the form of properly conducted research should be sought. We suspect that people will always primarily want to watch TV in the evening (prime time); that producers seeking the maximum audiences will want to schedule or otherwise provide material to be available at this time and to attract audiences' attention to this. We also believe that live programming such as news, sports, magazine shows for children, big national or local events, will continue to be a major reason for people to use broadcast media, and these will always be time bound. It would be a mistake to ignore 'time of day' as a major factor both in people's viewing and listening behaviour, and as a factor in what is 'suitable' for different audiences, however suitable is defined. (For example, we believe the concept of 'the watershed' is still a useful one.)

We commend the thoroughness and attention to detail of the section on the BBC's radio services.

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For a recent debate on the omission of references in the Green Paper to the Irish language and Ulster Scots, see: http://www.sluggertoole.com/archives/2005/06/slow_blogging_t.php#readcomment

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