

Your response

DIRECTORS UK

Directors UK response to the consultation on Ofcom's proposed Annual Plan 2019/20.

Directors UK welcomes the opportunity to comment on Ofcom's proposed Annual plan for 2019/20.

Our comments are focused on three key issues that affect our membership who are working TV and film directors:

- Monitoring and reporting on diversity and equality of opportunities in the UK TV industry and the inclusion of freelancers within this.
- Guidance on production outside London and strengthening production in the nations and regions.
- The changing landscape for broadcasting, online and VOD.

1. **Diversity and Equality monitoring and reporting** - With reference to publishing Ofcom's annual reports on diversity and equality of opportunity in broadcasting (sections 3.10, 5.6) Directors UK believe these reports need to include mandatory annual monitoring and reporting of freelance workers.

According to a recent CAMEo research report¹ "40% of the television workforce works on a freelance basis, with television production being one of the more freelance dominated screen industries". Yet, as Sharon White noted in the forward to Ofcom's 2017 diversity report, "Among freelancers working for broadcasters, half remain unmonitored"². The 2018 report also showed that the proportion of data not collected on freelancers as being 42% for gender, 57% for racial group, and 75% for disability³. Clearly the reporting of statistics without adequate information on freelancers provides an incomplete and skewed picture of the diversity and equality status of the UK TV industry workforce. We were disappointed to learn that the previous Secretary of State for DCMS did not see this as a legislative priority. We strongly urge Ofcom to require mandatory annual monitoring and reporting from broadcasters and production companies of their freelance production teams, as well as permanent staff, in order to ensure the validity of their reports. We also call for the obligatory publication of diversity and equality data on individual senior production roles. This transparency will prevent the lack of diversity and equality within specific roles being hidden in overall monitoring statistics. Without these improvements the industry will never be in a position to reflect society on and off screen. Directors UK has proved with our own reports that it is possible to produce high quality data about the composition and employment levels

¹ CAMEo (2018) Workforce Diversity in the UK Screen Sector: Evidence Review, CAMEo Research Institute: Leicester, <https://www2.le.ac.uk/institutes/comeo/publications/comeo-workforce-diversity-report-2018>

² https://www.ofcom.org.uk/__data/assets/pdf_file/0017/106343/diversity-television-report-2017.pdf

³ https://www.ofcom.org.uk/__data/assets/pdf_file/0021/121683/diversity-in-TV-2018-report.PDF

of a freelance workforce. Guilds, unions and Collective Management Organisations can and should play a part in helping Ofcom with this work.

2. **Nations and regions** – We welcome the focus on reviewing the guidance to public service broadcasters for production outside London. Directors UK will be responding to the current consultation on this guidance (closing 27th February). As highlighted in our response to the original consultation on this issue, it is a major concern among our members who work as directors in the Nations and regions that the current commissioning and hiring practices based on being located in the Nation and region have not supported or been of benefit to indigenous regional productions companies or talent. Ensuring Nations and regions representation both in front and behind camera can only be truly achieved if the people making the programmes live and work in the regions themselves and are being given the opportunity to work on them. Due to gaps in the monitoring and reporting on the use of regional off-screen talent the issue of the lack of hiring of key HOD roles e.g. Directors and Producers, based outside London, had largely gone unnoticed. We look forward to contributing to Ofcom’s plans to correct this and strongly encourage Ofcom to improve the qualifying criteria for production companies and the monitoring and reporting requirements on the hiring of local talent in key production roles.
3. **TV, online and VOD** - Finally, we agree that Ofcom should be taking a look at the health of the broadcasters in the TV, online and VOD landscape as part of their PSB review, as so much of the broadcasting landscape has changed beyond recognition. Whilst this offers a great deal of opportunity for audiences and programme makers, Directors UK is keen to ensure this does not have a negative effect on the quality of output, employment practices for UK talent and that there is fair compensation for rights holders for the repeat use of their work across all platforms. This is of particular significance as the BBC is now consulting on expanding how it delivers content for the iPlayer, much of which will require use of rights holders past and future works in an ongoing capacity.

About us:

Directors UK is the professional association of UK screen directors. It is a membership organisation representing the creative, economic and contractual interests of over 7,000 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.

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