Equity welcomes the opportunity to submit its response to Ofcom's consultation on its 'Review of Regional TV Production and Programming Guidance.'

It would like to thank [>] and [>] [Ofcom colleagues] for meeting on 13<sup>th</sup> February to discuss its concerns and welcomes their offer to relook at the guidance, to give consideration for increasing opportunities for local on-screen talent in TV and production work made near where they live.

This submission (below) restates Equity's concerns about the revised guidance and explanatory notes; we have not used the standard consultation response form, as our concerns do not specifically relate to the questions in it.

Equity is deeply disappointed that no change was made to Ofcom's guidance for public service broadcasters on regional production to provide opportunities for on-screen talent.

In its <u>review document</u>, it is welcome that Ofcom recognises on-screen talent as "an important part of the production industry" and "that local casting initiatives may benefit local on-screen talent". So it is disappointing this rationale doesn't make its way into the revised guidance and explanatory notes and that Ofcom feels that broadcasters and production companies "are best placed to decide what action is necessary to support the development of on-screen talent in the nations and regions", as this is currently not happening. Indeed, the specific exclusion of on-screen talent from the criteria for a production to qualify as regional, has been a major hurdle in persuading broadcasters and producers to consider and cast in that area.

Currently there are few, if any, opportunities for performers in the nations and regions to appear in productions made near where they live, because broadcasters and producers are often unwilling to explore the talent in the locality of the production and because the criteria for productions to qualify as 'Out of London' specifically excludes on-screen talent.

Equity appreciates that Ofcom is concerned that the cost of on-screen talent on some productions could skew the quotas for a production to qualify as regional, but there are other ways in which opportunities for performers living in the nations could be opened up. For example, by adopting a points-based system or by including an obligation on broadcasters/producers to undertake at least one casting session or set of auditions in the Region or Nation where the programme is made.

It is disappointing that not even Ofcom's statement about the importance of local casting makes its way into the proposed guidance and explanatory notes that will be used by Public Service Broadcasters in meeting their obligations. Equity appreciates that Ofcom is keen to keep the guidance brief, but now the only reference in the amended guidance to on-screen talent is that it's exempt from the criteria. If producers do not have to consider on-screen talent, we fear they may ignore it. Indeed, the research Ofcom commissioned made clear the extent to which TV production in the regions and nations is driven by PSBs; that what gets measured, gets managed, with the legal framework providing a vital boost to creative economies in the regions and nations of the UK.

A huge diversity of performing talent resides in the regions. There is no obligation of course to cast locally, but local castings and auditions give performers in the regions an opportunity to seen and considered for work near where they live. It also opens up employment opportunities to a broad and more diverse range of talent, including those from working class backgrounds, those with caring and parental responsibilities etc.

The consultation highlights the purpose of this regulatory structure as helping to strengthen regional production centres in the long-term and support broader creative and cultural economies across the UK, including "helping to disperse job opportunities in the sector across the UK". Actors and performers are a key part of their regional creative economies and are a significant factor in the success of productions.

Equity 26 February 2019