

## Consultation response form

### Your response

Question	Your response
<p><b>Question 1: What are stakeholder views on how Ofcom should assess and measure BBC performance?</b></p>	<p>WGGB believes that Ofcom should continue to assess BBC against a range of measures, including fixed targets for output by genre. We remain fearful that the current BBC strategic direction will result in continuing reductions in the type of content that audiences like best, including scripted comedy and drama across all platforms. We agree that the BBC’s online platforms should be included in the assessment of the BBC’s performance but have some concerns that without separate quotas/benchmarks for provision, content for some groups/nations will disappear from broadcast linear channels and be replaced by lower budget, lower quality digital only content.</p> <p>We believe that, as a public service broadcaster the BBC should also be assessed on household reach by income bands, to ensure that in its quest to “compete” with subscription platforms, it continues to serve <i>all</i> licence payers.</p> <p>Satisfaction rates by demographic groups should also carry more weight in Ofcom’s assessment of performance. Key audience groups continue to express lower satisfaction ratings in the BBC and the BBC must outline how it intends to address this.</p> <p>We also believe that the BBC should be assessed on the diversity of its workforce – including its freelance workforce. Monitoring information on the diversity of writers that the BBC contracts across its scripted outputs must be more effectively collected, monitored and utilised to address under-representation, including at a granular level per production and in development commissions.</p> <p>The definition of diversity should also be reviewed to take greater account of socio-economic background, and family/other</p>

	<p>connections with the BBC, as well as ethnicity, sexuality, gender identification, and disability.</p>
<p><b>Question 2: Do you agree with the proposals for Public Purpose 1? If not, please explain why.</b></p>	<p>In part. Whilst we welcome the increased transparency being proposed, we have concerns about the impact of the other proposals and support the views of our sister union NUJ in this matter.</p>
<p><b>Question 3: Do you agree with the proposals for Public Purpose 2? If not, please explain why.</b></p>	<p><b>Yes.</b> We welcome the introduction of a new requirement for the BBC to provide informal learning content for adults and children of all ages across its services and make this content easily discoverable.</p> <p>We fully support the introduction of new transparency requirements requiring the BBC to set out its plans to support learning, and report on the outcome of those plans.</p> <p>We welcome the expectation that BBC draw upon and report on its consumption data as well as providing evidence of impact.</p> <p>We support the proposal to move genre monitoring from public purpose 2 to public purpose 3 as long as that move does not result in any reduction in overall scrutiny of these areas.</p>
<p><b>Question 4: Do you agree with the proposals for Public Purpose 3? If not, please explain why.</b></p>	<p><b><i>In part.</i></b></p> <p>We welcome the retention of existing quotas for UK original productions and, with regret, accept the reduction in the quota for BBC Four, as discussed below.</p> <p>We agree with the new transparency requirements for BBC annual plans and reports, including the requirement for the BBC to set out its plans for the genres, first-run UK originations and acquisitions that it will deliver.</p> <p>We agree with the requirement for the BBC to provide distinct, transparent information about BBC iPlayer and BBC Sounds</p> <p>We agree with the expectation of continued investment in a range of first-run UK originations for children currently on CBBC and CBeebies and the associated transparency requirements.</p> <p>We are however disappointed in the proposal to replace quotas for arts and music, religious programmes, content for children and comedy on network TV with a condition to provide a wide</p>

	<p>breadth of output, as we believe that this will inevitably result in further cuts to these areas. We continue to believe that all audiences would benefit if the BBC were obliged to provide set hours of content in specific scripted genres including audio drama, television drama, children’s drama and comedy.</p> <p>We also have concerns at the proposals for “service neutral” original production quotas. We believe that this will have potentially damaging consequences not only for the writing community but also for audiences, by driving down production budgets across the board. Historically, “digital first” productions have had lower budgets and so by making production quotas “service neutral” Ofcom will be allowing the BBC to divert funds from already under-resourced genres into other areas of production. This risks the development of a two-tier system, with already at risk and minority interest content being relegated to online only, with all the attendant access issues that go with such an approach.</p>
<p><b>Question 5: Do you agree with our preliminary view on the BBC’s request to change Operating Licence conditions 2.21 and 2.32 for BBC Four, including our proposal to remove BBC Four’s peak original productions quota and set the ‘all hours’ quota at 65% instead of 60% as requested by the BBC? If not, please explain why.</b></p>	<p>We accept Ofcom’s preliminary view but continue to regret that the BBC was unable to make more of a success of its original production quota for the channel. The BBC has a rich archive of scripted content, and we hope that the proposals will at least result in larger audiences for that content.</p>
<p><b>Question 6: Do you agree with the proposals for Public Purpose 4? If not, please explain why.</b></p>	<p>No. We are concerned that the proposals will result in a reduction in the amount and quality of content for the nations and regions.</p> <p>We believe that the change from quotas to a “requirement” for content other than news and current affairs will result in a reduction of specialist content produced by and for the nations and regions. Audiences in Scotland already have lower satisfaction with the BBC than other areas and we believe that these measures will only compound that lack of satisfaction.</p> <p>As mentioned above, whilst we agree that online content should be accounted for in Ofcom’s assessment of the BBC, simply including online provision into quotas and requirements will allow</p>

	<p>the BBC to produce the majority of content for the Nations and Regions via “digital first” content. Such programming is often much lower budget and therefore doesn't support its contributors financially in the same way.</p> <p>We also have some concerns about the impact of increased co-commissioning of content for the Nations and regions, as this can skew the diversity of the production workforce. We have already observed this is in Wales where co-producers bring their own workforce from outside the region where the production is being made, meaning the local economy and local creatives do not benefit.</p>
<p><b>Question 7: Taken together, do you agree with the proposals for a new Operating Licence? If not, please explain why.</b></p>	<p>In part.</p> <p>We agree that changes are required to the Operating Licence.</p> <p>We agree that those changes should include the introduction of transparency measures.</p> <p>We agree that the new operating licence should incorporate the BBC’s digital platforms.</p> <p>Where they exist, we believe quotas relating to specific genres should be retained (other than for BBC4).</p> <p>We believe that quotas for other “at risk” genres such as audio drama and children’s scripted content should be introduced.</p> <p>We do not agree that quotas should be made platform neutral – especially in relation to content made for the Nations and regions.</p>