

RESPONSE
BY THE INTERNATIONAL BROADCASTING TRUST
TO THE OFCOM CONSULTATION
HOLDING THE BBC TO ACCOUNT FOR THE DELIVERY OF ITS
MISSION AND PUBLIC PURPOSES

July 2017

Response by the International Broadcasting Trust to the Ofcom consultation Holding the BBC to account for the delivery of its mission and public purposes

Executive Summary

1. IBT's primary interest is in the provision of engaging, accurate information about the wider world for audiences in the UK.
2. IBT research shows that the BBC plays a hugely important role in our lives, providing international content across a range of programme genres. We believe that this provision is one of its most distinctive contributions to UK broadcasting and society. It is our view that the BBC commissions popular international content which no other UK public service broadcaster would broadcast.
3. It is IBT's view that international content should be provided not only by news and current affairs which necessarily tend to focus on stories of disaster and conflict; it should also be provided through popular content which is engaging and entertaining, attracting significant audiences while informing them about people's lives in a rounded way.
4. International content relates the first four purposes in the following ways:

Purpose One – The BBC should provide duly accurate and impartial news, current affairs and factual programming ... so that all audiences can engage fully with major local, regional, national, United Kingdom and global issues. High Level Objective: the BBC should seek to maintain its coverage of regional, national and international themes and stories within its news, current affairs and factual programming.

Purpose Two – The conditions for factual and documentary output are placed under Purpose 2 and this output, as set out in Purpose 1, should include international content.

Purpose Three – Accurate and engaging international output across a range of genres is a distinctive contribution made by the BBC to UK society.

Purpose Four – This purpose includes to raise awareness of the different cultures and alternative viewpoints that make up [UK] society.

5. In order to assess the delivery of this important aspect of the BBC's purposes, IBT proposes that Ofcom should include the volume of non-news international content the BBC broadcasts each year in its Performance Framework. This measurement should include international children's programmes. Without measuring such content it will not be possible to fully assess the BBC's delivery of its mission and purposes.

6. It is worth noting that Ofcom used to measure the volume of non-news PSB international content. Now that Ofcom has taken over regulation of the BBC, IBT believes it should re-introduce tagging of international content for all the PSBs because it is necessary to both assess BBC delivery of such content and to have an understanding of how BBC delivery compares with other public service broadcast provision.
7. IBT notes that there is a presumption in the 2016 BBC Charter against removing any current requirements which would result in the provision of less distinctive output and services. Since BBC non-news factual content which engages us with the wider world is one of the BBC's distinctive characteristics, IBT believes that there should be no reduction in the provision of such content. In order to ensure this is the case, it will be necessary to measure the volume of this content.
8. One of the defining characteristics of distinctiveness as defined in the Charter and Agreement is that it denotes content which is underprovided by other broadcasters in the UK or in decline. International non-news content, while not classified as a genre as such, has been in decline on the main UK PSBs since IBT began tracking delivery of such content in 1989, therefore IBT considers that it is 'distinctive' in this context.
9. We believe that the approach to structure the Operating Licence around the public purposes and to have one Operating Licence for all BBC outputs is sensible.
10. However, we are concerned that in the process of placing the conditions for factual and documentary content under Purpose Two, Ofcom has disregarded the important requirement set out in Purpose One that such content should include international content. As a result we have proposed amendments to the High Level Objectives for Purpose Two.
11. We note that the BBC's recently published Annual Plan has also moved its strategy for factual and documentary output from under Purpose One where it lies in the Charter. Instead it has put this strategy under Purpose Three, distinctive content. In doing so, the BBC has omitted to articulate the strategic importance for factual and documentary output to include *international* content.
12. There are many examples of noteworthy and excellent international factual programmes in the BBC Annual Plan, such as Nadiya Hussain's *The Hajj* and *Exodus*, but there is no articulation of why these are considered to be distinctive or why producing international factual content is strategically important at a time when events in the wider world are having such a significant impact on our lives.
13. IBT would like to see the BBC amend its Annual Plan to include a new sentence explaining its strategy for international factual content and how it will ensure that such content is distinctive.

14. IBT considers it is essential that Ofcom and the BBC highlight the importance of international factual content in their approach. If they do not do so, this will run counter to the ambition of Purpose One which includes factual content alongside news and current affairs.
15. IBT does not believe the condition for CBBC drama and factual to include acquisitions fulfils the ambition of the Charter to provide UK children with UK content which is relevant to their lives. IBT believes that quotas for CBBC should focus on content which is original and produced specifically for UK audiences, rather than acquired content which is less likely to be UK produced and may be less relevant to life in the UK. It is important the BBC focuses on providing content which helps put young people's lives, growing up in the UK, into a global context.
16. IBT agrees that performance measures are a powerful way to hold the BBC to account, setting incentives before regulatory conditions are required. We welcome that Ofcom proposes to publish an independent annual report on BBC performance which will be put in the public domain.
17. IBT notes that BBC Three online content will not be regulated by Ofcom. IBT would not suggest that there should be any conditions set for BBC Three, but we recommend that BBC Three online content should be taken into consideration in the Performance Measurement Framework.
18. While IBT understands that Annex 6 is provided primarily for illustrative purposes, we have made a number of comments and suggestions which we would like Ofcom to take into account when developing the framework for assessing the performance of the BBC.
19. IBT agrees with Ofcom's approach to setting and amending the Operating Licence and Performance Framework.

Introduction

20. IBT's primary interest is in the provision of engaging, accurate information about the wider world for audiences in the UK. IBT represents the concern of its members, organisations within the UK who want to see the UK population fully engaged with events, cultures and the lives of people in the wider world.
21. IBT research shows the BBC plays a hugely important role in our lives because its services are viewed by more people than any other UK broadcaster and it has significant impact on our lives, providing international content which is accurate, popular, engaging and impartial. We believe that the BBC's international content across a range of genres for a range of UK audiences is one of its most distinctive contributions to UK broadcasting. It is IBT's view that the BBC commissions many programmes which no other UK public service broadcaster would broadcast and IBT commends the BBC for its delivery of this important content.

22. According to the most recent IBT quantitative research, the BBC provides 51% of all the TV non-news international content on the channels analysed in our survey.¹ The volume of non-news international content has been in decline across the main PSB channels since 1989 when IBT began tracking such content.
23. BBC Trust Purpose Remit Surveys consistently showed that the Global purpose was the best performing purpose, with its statements receiving an average performance score of 73% in the most recent Purpose Remit Survey. It was also considered the most important statement, with an average importance score of 78%.²
24. IBT's approach is that, as UK citizens, we are all at the same time citizens of the world. We have needs, rights and interests in being accurately informed and educated about both our own society and that wider international society of which we are a part.
25. Recent events, including the refugee crisis, the UK terror attacks and the EU Referendum, are examples of events which have and will continue to have an impact on our lives. They show how important it is that we are aware of international political, social and economic drivers at play in order to fully understand events in the UK and what our role and responsibility should be as a nation. Therefore it is crucial that audiences are informed and educated accurately about the world so that they are able to participate as citizens in democratic debate about the UK's role in the world and we are engaged at an imaginative and emotional level with the issues facing citizens elsewhere in the world.
26. It is IBT's view that international content should be provided not only by news and current affairs which necessarily tend to focus on stories of disaster and conflict; it should also be provided through popular content which is engaging and entertaining, attracting significant audiences while informing them about people's lives in a rounded way. Recent examples of engaging international factual content include *Exodus* (BBC Two) which followed the journeys of refugees across the Mediterranean and Europe, *Welcome to Rio* (BBC Two) which looked at life for those living in Rio in the run up to the 2016 Olympic Games, *Colombia with Simon Reeve* (BBC Two) and *The Chronicles of Nadiya* (BBC One).
27. IBT notes that there is a presumption in the 2016 BBC Charter against removing any of the current requirements which would result in the provision of less distinctive output and services. Since BBC non-news content which engages us with the wider world is one of the BBC's distinctive characteristics, IBT believes that there should be no reduction in the provision of such content. IBT holds that the only way to ensure this is the case is by measuring the volume of international non-news content.

¹ *Reflecting a Changing World*, IBT (2015)

² *Purpose Remit Survey 2015* BBC Trust, pg 29

28. IBT is concerned that because UK originated international programmes cost more to make than domestically made programmes, funding for such content is more likely to be at risk at a time when the BBC's budgets are constrained.
29. It is worth noting that Ofcom used to track the volume of non-news PSB international content and only stopped because it wanted to reduce compliance burdens on broadcasters. The BBC Trust took over the measurement of delivery of such content in 2006 which reduced the need for Ofcom to do so. Now that Ofcom has taken over regulation of the BBC, IBT believes it should re-introduce tagging of international content for all the PSBs because this will be necessary if it is to assess BBC delivery of such content and to have an understanding of how BBC delivery compares with other public service broadcast provision. Channel 4 already reports on the volume of international content it broadcasts annually in its Annual Report.

Consultation Questions

Question 1: Do you agree with our overall approach to setting the operating licence?

30. IBT valued the work of the BBC Trust in holding the BBC to account on behalf of audiences. While we understand that the new model for regulating the BBC is different from that under the BBC Trust, we welcomed the Trust's approach which we considered to be transparent and we welcomed its efforts to engage with audiences and stakeholders.
31. IBT considers the BBC Trust's approach to research was generally comprehensive, based on a combination of quantitative and qualitative measures. Ofcom appears to be taking a similar approach and we welcome this.
32. IBT also welcomed the BBC Trust's reviews of content, such as those which examined coverage of the environment, Africa, and the Arab Spring.³ We are pleased to see that Ofcom will plan to conduct similar ad hoc reviews into specific subject areas when it considers them necessary.⁴
33. IBT hopes that Ofcom will be able to continue the BBC Trust's approach by engaging with the public to inform its assessment of the BBC's delivery of its mission. We also hope that Ofcom will maintain the transparency the BBC Trust instituted by placing its research in the public domain.
34. We agree that the new conditions for BBC delivery should be based on existing quotas and BBC delivery of these quotas in the recent past. We agree that a balance is required between imposing conditions and allowing the BBC the freedom to deliver its strategy and be creative.

³ http://www.bbc.co.uk/bbctrust/our_work/editorial_standards/impartiality.html

⁴ *Holding the BBC to account for the delivery of its Mission and Purposes*, Ofcom, 29 March 2017, Pg 15, para 3.5

35. We believe that the approach to structure the Operating Licence around the public purposes and to have one Operating Licence for all BBC outputs is sensible.
36. However we are concerned that in the process of placing the conditions for factual and documentary content under Purpose Two, Ofcom has disregarded the requirement which is set out in Purpose One that such content should include international content.
37. We note that the BBC's recently published Annual Plan has also moved its strategy for factual and documentary output from under Purpose One where it lies in the Charter. Instead it has put this strategy under Purpose Three, distinctive content. In doing so, the BBC has omitted to articulate the strategic importance for factual and documentary output to include *international* content.
38. There are many examples of noteworthy and excellent international factual programmes in the BBC Annual Plan, such as Nadiya Hussain's *The Hajj* and *Exodus*, but there is no articulation of why these are considered to be distinctive or why producing international factual content is strategically important at a time when events in the wider world are having such a significant impact on our lives.
39. IBT would like to see the BBC amend its Annual Plan to include a new sentence explaining its strategy for international factual content and how it will ensure that such content is distinctive.
40. IBT considers it is essential that Ofcom and the BBC highlight the importance of international factual content in their approach. If they do not do so, this will run counter to the ambition of Purpose One which includes factual content alongside news and current affairs.
41. IBT understands that while the Performance Measurement Framework, which Ofcom is developing, is separate from the Operating Licence, the two will be closely related. In light of this, an issue of concern to IBT is that Ofcom has not included any reference to BBC Three online content in its Operating Framework. IBT considers that BBC Three produces some of the most original and engaging international content, such as *Dictatorland*, *The Refugee Diaries*, and *Stacey Dooley Investigates* and that this content should be taken into consideration when assessing the BBC's performance. We are not suggesting there should be conditions relating to BBC Three content, but that it should be included when assessing the BBC's delivery of its mission and purposes.
42. It is IBT's view that a balance is required between conditions which demand guaranteed levels of volume in certain genres with the ability to deliver such volume while maintaining the quality of output. If volume becomes too dominant a factor this could lead to quality being undermined.

43. IBT welcomes Ofcom's flexible approach to the Operating Licence, allowing for changes to be made to it if it is thought that any conditions in the Licence are undermining the BBC's ability to deliver high quality content.

Question 2: Do you agree with the approach we have proposed for public purpose 1, including the high level objects and regulatory conditions we are proposing?

44. The delivery of Purpose One is of great concern to IBT members who want the potential of mainstream broadcasting to broaden audience horizons to be maintained.
45. IBT considers it is crucial for factual programming to be broadcast alongside news and current affairs content which tells us about the world around us. Our concern is that news programmes especially tend to focus on dramatic and often negative stories because of the nature of daily news. While current affairs programmes provide more depth and context, they only appeal to certain sectors of the audience. In order to ensure that *all audiences can engage fully with major local, regional, national, United Kingdom and global issues*⁵ the BBC needs to provide a range of content to engage the full spectrum of audiences from young to old. It should aim to inform, inspire, engage emotionally and broaden audience horizons. This strategy should include content for children.
46. IBT is concerned that that the emphasis in the consultation is too heavily placed on news and current affairs. We note that factual and documentary conditions sit under Purpose Two (Education) however these include no reference to this content needing to be international. As a result of the consultation's approach, the importance of factual programming, as set out in Purpose One, to engage us with the *wider world* has been ignored. This is an important aspect of Purpose One and should not be disregarded. We have commented further on this issue in our response to Question 3.

High Level Objectives

47. We note in paragraph 4.32.1 the proposed first high level objective includes factual programmes, alongside news and current affairs, which seek to reach and serve all audiences.
48. With reference to this high level objective, we are concerned that the word 'significant' doesn't provide enough clarity. IBT would suggest that this objective should require the BBC to maintain existing levels of delivery as a minimum. This would accord with the ambition in paragraph 4.32.2 where Ofcom proposes that the BBC should seek to *maintain its coverage of regional, national and international themes and stories within its news, current affairs and factual programming*.⁶

⁵ Purpose 1, *BBC Charter 2016*

⁶ *Holding the BBC to account for the delivery of its Mission and Purposes*, Ofcom, 29 March 2017, para 4.32.2

49. While we understand there are no conditions under Purpose One which require a minimum volume of international factual programming, IBT expects Ofcom to institute means by which it can measure whether the high level objectives for this purpose are being met and these should include the volume of original international factual content.

Regulatory Conditions

50. IBT notes that the proposed regulatory conditions increase the requirement of the volume of news on BBC One, Current Affairs on BBC and Two, news and current affairs on Radio 4 and Radio Cymru; additionally they add a requirement for an extended weekday bulletin on Radio 1 in peak and 3 hours a week of news and current affairs in peak on Radio 2.

51. IBT views these changes as proportionate and generally achievable without undermining the BBC's ability to deliver high quality content.

Question 3: Do you agree with the approach we have proposed for public purpose 2, including the high level objects and regulatory conditions we are proposing?

52. IBT notes the distinction in this purpose between informal and formal education.

53. Specialist factual programmes which engage audiences with a range of subjects make up a large proportion of the BBC's factual output. Ofcom research demonstrates that these programmes continue to be popular with audiences and broaden our horizons.⁷

54. IBT is concerned that this section of the consultation which includes factual programmes makes no reference to international content.

Children's programmes

55. IBT considers children's programmes which encourage informal learning are crucial if younger audiences are to be engaged and informed about the world around them. IBT notes the significant decline in investment in UK produced children's programmes since 2003. It is essential that the BBC continues to provide a range of content for younger and older children which is entertaining, informative and provides them with a window on the wider world.

56. IBT highly commends *Newsround* for maintaining its commitment to providing news content which explains to UK children their place in the wider world. A current series which demonstrates BBC distinctiveness in providing UK children with content which is not available on any other UK broadcaster is the CBeebies series *Where in the World*.

57. IBT notes the increased commitment to children's content and a new strategy to deliver content to children on a range of platforms in the BBC Annual Plan. We understand that an extra £34m investment in children's content will be phased

⁷ PSB Annual Report 2016, Ofcom

in over the next three years, with £6m being added to the department's budget this financial year, followed by £13m in 2018/19 and £15m in 2019/20.

High Level Objectives

58. IBT notes the proposed wording of the High Level Objectives for Purpose Two.

59. As stated above in response to Question 2, IBT believes that since the conditions for factual programmes and documentaries under Purpose One have been transferred to Purpose Two in the Operating Licence, it is necessary to include the requirement that these should include *international* programmes since this is an important aspect of Purpose One which otherwise may be disregarded.

60. IBT proposes that the first high level objective for Purpose Two⁸ should be revised so it reads as follows:

Continue to provide a broad range of content across its services which provide opportunities for all audiences to learn. We expect the BBC to produce informal learning content which covers subjects such as art, music, religion, science, nature, business and history programming. ***This content should include programmes which provide international context and themes.*** This content should be widely available, and the BBC should endeavour to serve and reach the widest possible audiences with this content via its mainstream TV channels, radio stations and websites;

61. We would propose that the third high level objective⁹ could be strengthened by including the goal to 'broaden horizons'. We suggest the following revised version of high level objective three:

Ensure that it serves children of all ages, including older children and teenagers, and that it produces engaging and stimulating content for informal learning which ***broadens children's horizons and*** is available in the formats and on the services that children use;

Regulatory Conditions

62. IBT notes that regulatory conditions oblige the BBC to schedule some specialist factual programmes in peak time on BBC One and BBC Two, increase the volume of some specialist factual content and increase the quota for CBBC factual and drama programming.

63. IBT is concerned that the condition for CBBC drama and factual includes acquisitions. IBT believes that quotas for CBBC should focus on content which is original and produced specifically for UK audiences, rather than acquired content which may be produced outside the UK and less relevant to life in the UK. The role the BBC has played until now in providing children's content is to broadcast content which is culturally, socially and informationally UK-centric. There is a

⁸ *Holding the BBC to account for the delivery of its Mission and Purposes*, Ofcom, 29 March 2017, para 4.49.1

⁹ *Holding the BBC to account for the delivery of its Mission and Purposes*, Ofcom, 29 March 2017, para 4.49.3

huge amount of foreign content, which is mostly US-produced, available on other UK broadcast and online channels, but there is little which is specifically relevant to British children's audiences. IBT considers that young people growing up in the UK need to be provided with content which puts their lives in context globally, so that they understand, for example, how events in Syria or Iraq might impact on them in UK or how the UK is approaching the refugee crisis. This content needs to be produced so that it is relevant and specific to the experience of someone growing up in the UK. IBT therefore opposes the proposal for the conditions for CBBC to include acquisitions unless it is specified that this content should be produced to be demonstrably relevant to UK children.

Question 4: Do you agree with the approach we have proposed for public purpose 3, including the high level objects and regulatory conditions we are proposing?

64. International factual content which engages UK audiences and informs us about the wider world is one of the most distinctive contributions the BBC makes to UK society. Ever since its creation the BBC has provided a window on the wider world for audiences and this has been a central pillar of its delivery of the mission to inform, educate and entertain. International content across a range of different genres which appeal to different audiences is essential to provide the public with a rounded view of the world which is not limited to the perspective provided by news which tends to focus on disasters.
65. IBT's most recent quantitative research demonstrated that in 2014/15 the BBC provided 51% of all non-news international content on the UK's main TV channels.¹⁰
66. IBT proposes that the volume of non-news international BBC content should be measured as an indicator of the BBC's distinctiveness.
67. IBT notes that in its recently published Annual Plan the BBC puts its strategy for factual programmes under Purpose Three because it views this contribution as distinctive. IBT agrees that the BBC's factual programmes are distinctive and since the volume of international factual content across the PSBs is in decline, international factual programmes are even more so.
68. IBT welcomes the reference in the BBC Annual Plan to a number of distinctive international programmes the BBC is planning to broadcast during the coming year. These include Nadiya Hussain's *The Hajj* and *Exodus*, but there is no articulation of why these are considered to be distinctive or why producing international factual content is strategically important at a time when events in the wider world are having such a significant impact on our lives. IBT believes this is an omission which needs addressing. It is important that the BBC explains its strategy in commissioning such programmes, so that it is clear that it has recognised this important aspect of its mission and it sets out how it will deliver it.

¹⁰ *Reflecting a Changing World*, IBT (2015)

69. One of the characteristics of distinctiveness as defined in the Charter and Agreement is that it denotes content which is underprovided by other broadcasters in the UK or in decline. The Charter states that Ofcom must *have particular regard to the desirability of setting... requirements relating to the amount and prominence of genres which .. are underprovided or in decline across public service broadcasting*¹¹.
70. Genres such as arts, religion and music programming have all been highlighted as being in decline and the BBC Annual Plan sets out strategies to improve its delivery of such content which IBT welcomes.
71. International content is not classified as a genre and its volume is not quantified by Ofcom or broadcasters, therefore its decline has not been highlighted. The provision of non-news international content has been in decline on UK public service broadcasters' main channels since the year since 1989 which is clearly demonstrated by IBT's unique long-term tracking survey¹².
72. Other IBT research demonstrates a crisis in the provision of international current affairs content which is a sub-set of international factual content. In the report *An Uncertain Future – the threat to Current Affairs* we highlighted the important role current affairs plays in the public service broadcasting landscape:

*The case studies highlighted in this report demonstrate the contribution of current affairs to shifts in policy, reviews of current practices and holding the powerful to account. However, impact is difficult to measure and many of those interviewed were keen to stress that the real impact of current affairs is its contribution to a well-informed population.*¹³

We noted that current affairs producers interviewed for the report were particularly concerned about the future of two sub-genres: investigations and international stories, saying that both were more difficult to produce and more expensive than other forms of current affairs and therefore more at risk.

*There's a real danger that the picture of the world we get from TV is shrinking. Investigations are also under threat because in straitened economic times broadcasters inevitably reduce their exposure to this expensive, labour intensive and risky form of journalism.*¹⁴

74. While international content is not a 'genre' per se, IBT urges Ofcom to include international factual content for consideration as a 'genre' which should be included in its assessment of BBC delivery of distinctive output.

¹¹ BBC Agreement 2016, Schedule 2, Clause 2.2

¹² *Reflecting a Changing World*, IBT (2015) Figure 1: Total hours of new international factual programming on UK television, 1989–2015

¹³ *An Uncertain Future – the threat to Current Affairs*, IBT (2012)

¹⁴ *Ibid.*

The contribution of non-news international content to the BBC distinctiveness

75. As stated above, IBT notes that there is a presumption against reducing BBC distinctiveness in the BBC Charter and Agreement. It is IBT's view that the volume of non-news international content the BBC broadcasts should be measured to ensure that BBC distinctiveness is increased which is the ambition of the Charter.
76. Additionally, Ofcom is required to have particular regard to the ensuring *the provision and prominence of genres that provide a particular contribution to the mission and public purposes*¹⁵.
77. As stated above, international factual content makes a strong contribution to Purpose One and are a distinctive aspect of BBC output, contributing to Purpose Three. International content also contributes to Purpose 4, *to reflect, represent and serve the diverse communities of all of the United Kingdom's nations and regions*. International content is required if the BBC is to *raise awareness of the different cultures and alternative viewpoints that make up UK society* since many of these originate from outside the UK. Therefore it will be necessary for the BBC to broadcast international content in order to be able to provide context and background in order to fulfil this purpose.
78. With reference to Purpose Four, we note recent Ofcom commissioned research¹⁶ which highlighted the fact that audiences want the BBC to increase diversity on screen. This included *strong concerns* by BME groups about the *lack of positive portrayals of Muslims and Black Africans in the UK in the media as a whole*. In one group it is noted that participants *felt that local and international stories had a negative bias in the reporting of stories which involved Muslims* and for black African participants there was a concern around a *lack of positive portrayals of Africa, Africans and Black Africans living in the UK*.¹⁷ They said they wanted more positive portrayals in mainstream content and services, including at peak times and on popular programmes.

Measuring Distinctiveness

79. IBT agrees with Ofcom that defining distinctiveness in a way that is measurable is complex, however we believe that measuring the volume of non-news international content would be a relatively straightforward and quantifiable way to track this aspect of BBC distinctiveness annually.
80. Ofcom used to require all Public Service Broadcasters to report the volume of non-news international content they broadcast under compliance arrangements but this requirement was dropped a number of years ago in order to reduce the compliance burden on PSB's the value of whose licences were declining. Additionally the BBC Trust was responsible for assessing the BBC's delivery of

¹⁵ *Holding the BBC to account for the delivery of its Mission and Purposes*, Ofcom, 29 March 2017, Pg 32, para 4.65

¹⁶ *BBC Distinctiveness*, Ofcom, June 2017

¹⁷ https://www.ofcom.org.uk/data/assets/pdf_file/0026/99521/bbc-distinctiveness-research-executive-summary.pdf pg 24

international content required by the global purpose, so there seemed less need for Ofcom to do so. It must be noted that since 2010 Channel 4 quantifies and reports on the volume of non-news international content it broadcasts each year for its Annual Report.

Regulatory Conditions

81. IBT agrees with Ofcom that ensuring that the percentage of original output in peak time and the volume of first-run UK originations are key to ensuring the BBC maintains its distinctiveness. IBT supports the proposed original production quotas for all BBC UK public TV services and the minimum levels of first-run UK originations for BBC One, BBC Two, CBBC and CBeebies on the understanding that these conditions are broadly in line with existing BBC delivery.
82. However we are concerned that Ofcom and the BBC should monitor the impact of these quotas to ensure that they do not undermine the BBC's existing strategy which has been to provide 'landmark', high cost series, such as the *Planet Earth* series, which are then repeated, ensuring greater exposure. There is a risk that setting the bar too high in terms of quotas for the volume of first-run UK originations may lead to a reduction in such ground-breaking high quality programmes which would be detrimental for audiences.

Question 5: Do you agree with the approach we have proposed for public purpose 4, including the high level objects and regulatory conditions we are proposing?

83. We agree with Ofcom that it is important to consider separately representation of the diverse communities of the UK and delivery of content for the Nations and regions of England which is relevant to those different populations.
84. IBT limits its response to this question to the delivery of international content which is representative of the diverse cultures of the UK because its expertise lies in the provision of international content.
85. We support the inclusion of diversity in the Charter for the first time and welcome the high level objective that BBC content should *accurately represent and authentically portray all audience groups*.¹⁸
86. IBT notes the recent research conducted by Ipsos Mori on behalf of Ofcom into BBC Distinctiveness which highlighted the fact that many members of the UK public have their family origins outside the UK.
87. We note that *Audiences felt.. the BBC could do more to reflect and serve different audiences across the UK, for example in terms of age, race and socio-economic background*.¹⁹ We note from Ofcom PSB Diversity Research²⁰ those from BAME

¹⁸ *Holding the BBC to account for the delivery of its Mission and Purposes*, Ofcom, 29 March 2017, para 4.109.1

¹⁹ *Holding the BBC to account for the delivery of its Mission and Purposes*, Ofcom, 29 March 2017, para 4.119

²⁰ *PSB Diversity Research Summary*, Ofcom (2015)

backgrounds feel under-represented and negatively portrayed more than other groups.

88. If the BBC is to encourage understanding and tolerance of UK multi-culturalism among its audiences, it is crucial that that it provides content which contextualises the diverse cultural, social and religious traditions which characterise the British population. This will often involve referring to the roots of such traditions which lie abroad. This is another reason why international non-news content should be prioritised as an important aspect of BBC delivery.

Question 6: Do you agree with Ofcom's approach to how we will set and amend the operating licence as set out in Annex 5?

89. We agree with Ofcom's approach to how it will set and amend the Operating Licence as set out in Annex 5.

Question 7: Do you agree with our proposed overall approach to performance measurement?

90. As stated above in response to previous questions, IBT proposes that Ofcom should measure the volume and nature of international non-news content when it assesses BBC performance.

91. We believe that measuring the volume of such content will be a relatively straightforward and quantifiable way to track aspects of the delivery of Purpose One, Purpose Three and Purpose Four annually.

92. We have already laid out our reasoning for this proposal, but to summarise:

- Non-news international factual content is distinctive.
- International content is included in the High Level Objectives for Purpose One. It will need to be measured if Ofcom is to assess delivery of these objectives.
- Ofcom is required to have particular regard to the ensuring *the provision and prominence of genres that provide a particular contribution to the mission and public purposes*²¹. International factual content makes a strong contribution to Purpose One, is a distinctive aspect of BBC output, contributing to Purpose Three and is important to provide context for Purpose Four.
- There is a presumption against reducing BBC Distinctiveness in the Charter. If the volume of international content declines, this would represent a reduction in BBC distinctiveness which would run counter to the ambition of the Charter.
- Ofcom used to require that all Public Service Broadcasters 'tagged' international content under their compliance arrangements. Channel 4 already measures the volume of its international non-news content.

²¹ Pg 32 para 4.65

93. BBC Trust Purpose Remit Surveys consistently showed that the Global purpose was the best performing purpose, with its statements receiving an average performance score of 73% in the most recent Purpose Remit Survey. It was also considered the most important statement, with an average importance score of 78%.²²

Measuring International Content

94. IBT has been measuring the volume of non-news international content since 1989. More recently it has also been analysing this content, to understand better the nature of this output across different genres, countries and subjects covered.
95. The methodology IBT used in its most recent quantitative study²³ is set out in its *Reflecting a Changing World* report as follows:

Included within this study are all new, non-news, international factual programmes on UK television broadcast on BBC1, BBC2, ITV1, Channel 4, Five, BBC3, BBC4, More4 and Sky1 between June 1st 2014 and May 31st 2015. International programming is defined as: programming in which the principal themes are explicitly and directly related to a country or countries outside the UK or persons from such countries. This definition allows programmes which do provide content relating to foreign countries but which are filmed primarily in the UK, to be included.

Factual programming refers to any form of documentary or other factual programming, including features and coverage of special events. Hobbies/leisure programmes, consumer programmes, current affairs and reality shows are also included, but are coded as separate sub-genres, rather than as "serious factual" programming.

Open University, school programmes, the Learning Zone, repeats and 'omnibus' collations are not included in this research. Programmes consisting solely or mainly of archive material are not included. The genre of programmes collating clips of real life footage from other countries, such as CCTV footage, is included. Arts and culture programming is included, but programmes focused primarily on foreign celebrities, where the culture of their home country is not examined, are excluded. Music shows recorded overseas but consisting of performance only were not included. Those which blended musical performance with other material on the culture or society of the country concerned were included. Studio programmes such as Newsnight were not included because the information required to identify every piece of international content is not readily available. These criteria are consistent with those used previously. They exclude programmes which are shot in foreign countries but which have little or no content to inform audiences about the character of that country, such as I'm a Celebrity Get Me Out Of Here!

²² *Purpose remit survey 2015*, BBC Trust, pg. 29

²³ *Reflecting a Changing World*, IBT (2015)

The data for this study was collected from publicly available listings sources such as the Radio Times and the websites of individual programmes. It was then presented to the broadcasters for comment and corrections where necessary.

Other comments on Performance Measures

96. IBT agrees that performance measures are a powerful way to hold the BBC to account, setting incentives before regulatory conditions are required. We welcome that Ofcom proposes to publish an independent annual report on BBC performance which will be put in the public domain.
97. IBT welcomes that Ofcom's performance measurement framework will be partly reliant on existing Ofcom research base, such as the PSB Annual Research Report and the annual News Survey. These pieces of research provide significant insight into audience attitudes to PSB in general.
98. We understand that in addition to these existing pieces of research, Ofcom will commission bespoke research on BBC performance, similar to the Purpose Remit Surveys the BBC Trust conducted, which were a useful indicator of BBC delivery and audience satisfaction.
99. Now that Ofcom is responsible for representing the audience interest in the BBC, IBT believes that audience research should be central to Ofcom's research when assessing BBC performance, therefore we welcome Ofcom's focus on audience research. We note that Ofcom's expertise until now has been in engaging mostly with industry stakeholders. Many industry stakeholders are in direct competition with the BBC and this will influence their views. IBT hopes that Ofcom will develop ways to engage with audiences in order to ensure that the views of audiences are taken into account in their assessment of BBC delivery of its mission.
100. IBT welcomes the inclusion of comparability in the principles of measurement so that the BBC's delivery is benchmarked against other providers in the market. This will be necessary if BBC distinctiveness is to be assessed.
101. As stated above in response to Question 1, IBT notes that BBC Three online content will not be regulated by Ofcom. IBT would suggest that BBC Three online content should be taken into consideration in the Performance Measurement Framework. BBC Three international content is some of the most distinctive, innovative and engaging international content produced by the BBC. It is also designed to appeal to a younger than average audience which Ofcom research²⁴ indicates is underserved by the BBC since the closure of BBC Three's broadcast channel.
102. IBT notes as well that when BBC Three was closed as a broadcast channel, the BBC Trust committed to holding a review of BBC Three 18 months after the closure but because the BBC Trust has been disbanded, this review will no longer

²⁴ *BBC Distinctiveness*, Ofcom, June 2017

take place. IBT would suggest that an up to date review of BBC Three's delivery of the BBC's mission and purposes should be conducted now that its content is primarily targeted at online audiences.

Detailed comments on Annex 6 – Overview of Proposed Framework for Assessing the Performance of the BBC

103. While IBT understands that Annex 6 is provided primarily for illustrative purposes, we have a number of comments and suggestions which we would like Ofcom to take into account when commissioning the framework for assessing the performance of the BBC.

Purpose 1: Availability

104. IBT would like to propose that Ofcom should measure the hours of first run UK originated non-news international factual content across radio, TV and online annually. Current affairs content should be included within factual as a sub-set.

105. As part of its content analysis, Ofcom could include the locations where programmes are filmed, the genres they cover and the subject matter covered.

Purpose 1: Impact

106. Qualitative audience research could follow the methodology of the Purpose Remit Surveys which assessed delivery of the Global Purpose, asking the following questions:

- Do factual programmes help you understand what is going on in the wider world?
- Do factual programmes help you understand the cultures and lifestyles of people from around the world?
- Does the BBC help you understand international politics and the UK's place in the world?

107. These questions would tell us how well the BBC is delivering Purpose 1, specifically how well it is engaging audiences with information which tells them about the world around them.

Purpose 1: Contextual Factors

108. IBT would like to propose that Ofcom should measure the volume of non-news international factual content on ITV1 and Channel 5, alongside the data provided by Channel 4 in its annual report. This could provide a context into which BBC delivery of international content would be more meaningful.

Purpose 2: learning for people of all ages – Availability

109. IBT would like to propose that non-news international content could be used as a sub-metric under availability, showing which factual and documentary

genres provide content across the BBC which supports the delivery of Purpose 1 annually.

Purpose 2: learning for people of all ages – Impact

110. IBT believes it is important to know whether audiences learn about the wider world through BBC specialist factual content, such as arts, religion and science programmes.

111. Qualitative audience research could include the following questions:

- Do history programmes help you understand the UK's position in the world?
- Do arts programmes help you understand the cultures and lifestyles of people from around the world?
- Do science programmes broaden your understanding of global scientific developments such as climate change?

Purpose 3: Availability

112. IBT proposes that the volume of non-news international factual content is measured annually by genre on BBC TV, radio and online to assess BBC distinctiveness.

Purpose 3: Impact

113. Qualitative audience research to assess BBC distinctiveness could include the following questions:

- Does the BBC provide you with more engaging information about the wider world from what you see elsewhere?
- Are the BBC's international documentaries distinctive?
- Have you been surprised by anything you have learnt by watching international documentaries on the BBC?

Purpose 4: Diversity - Availability

114. IBT would like to propose that Ofcom should analyse which countries are covered in BBC non-news international content annually. This would indicate whether the BBC is providing an accurate, contextualised representation of cultures and traditions which are followed by many communities in the UK.

Purpose 4: Diversity – Consumption

115. IBT considers it will be essential for Ofcom to analyse the profile of BBC audiences so that it can assess whether the BBC is appealing to audiences with different ethnic, religious and socio-economic backgrounds across a range of subject areas and genres.

Purpose 4: Diversity – Impact

116. In light of the recent Ofcom commissioned Ipsos Mori research²⁵ which showed that some audiences, especially the BAME audience, felt under-served by the BBC, it would be useful to know whether audiences believe the BBC has accurately represented their communities.

117. Questions in qualitative research could include:

- Has the BBC raised awareness of different cultures and viewpoints in its factual programmes?
- Do you think the BBC accurately reflects the wider world to audiences in the UK?
- Have you learned anything new about British culture by watching the BBC?

Question 8: Do you agree with the proposed framework of: availability; consumption; impact; contextual factors?

118. IBT believes the framework of availability, consumption, impact and contextual factors is a comprehensive way to assess the delivery of each public purpose.

119. IBT would suggest that the volume of non-news international content should be one of the categories used to assess delivery of Purposes One, Three and Four. The volume and genres in which international content appears should be tracked as well as the channels or platforms it is broadcast on as well as audience attitudes to this content.

120. While consumption provides a useful indicator of reach and time spent consuming BBC services by different audiences, IBT would guard against stressing the importance of this metric in order to allow the BBC creative freedom to take risks and innovate.

121. IBT notes that impact is notoriously difficult to assess, however we look forward to finding out more about the indicators Ofcom intends to employ to assess it.

122. IBT welcomes the inclusion of contextual factors in the proposed framework. The BBC faces challenging years ahead with a reduced licence fee settlement and a predicted increase in competition from the wider market. It will be necessary for Ofcom to take into consideration market forces, delivery of content by other PSB's and the BBC's financial circumstances if it is to properly assess BBC performance.

Question 9: Do you agree with Ofcom's approach to how we will set and amend the performance measures?

123. IBT agrees with Ofcom's approach to how it will set and amend the performance measures.

²⁵ *BBC Distinctiveness*, Ofcom, June 2017

INFORMATION ABOUT IBT

IBT is a coalition of organisations in the UK involved with international development, human rights and the environment. The views in this submission reflect the concerns of IBT's member agencies regarding adequate common understanding of the world in which we live. We are supported by a large proportion of the UK public which is concerned with the effects of 'globalisation' and our role as global citizens.

IBT's position, reflected in all our policy work since 1997, is that coverage of the developing world should not just focus on images of suffering which is more often than not what is presented in news coverage. It is IBT's view that an international dimension should be an integral part of all programming.