

The Radio Committee
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To Whom It May Concern:

'Holding the BBC to account for the delivery of its mission and public purposes'

A response from the Radio Committee of the Writers' Guild of Great Britain

The committee understands that Ofcom has expressed a preference for specific answers to the questions listed in the consultation document, however we feel that there is a broader issue to raise which takes in both Question 1, regarding the approach to setting the operating licence, and also Question 4, concerning distinctiveness and quality of output.

While there is much in the consultation to applaud, it seems to this committee that some of the objectives stated, and the various underlying premises are perhaps attempting an overly hands-off, catch-all, end-user approach. At various points within the document Ofcom is keen to reiterate that they do not see it as their role to involve themselves – as regulator – in creative decision-making, quotas by genre, management structures or production.

By and large this is an approach the radio writers committee would endorse, but in this case we are keen to remind Ofcom of the very particular history and unique artistic ecosystem that sustains the audio jewel that is radio drama, and ask that they ensure that this is factored into their approach as regulators.

In paragraph 4.79.1 Ofcom says

Many services offered by the BBC are single purpose services that have no directly comparable provider, such as BBC Radio 4 and BBC Alba, and the notion of increasing the distinctiveness of such services further is problematic.

But aside from this, there seems to be little mention of what some might see as one of the BBC's major challenges in the new media landscape, i.e. that the corporation acts in some areas within a fiercely vibrant free market (eg TV Drama), and in others as a monopoly provider/commissioner (eg Radio Drama). These are forces that can pull in vastly opposing directions.

Indeed at times, the consultation seems to forget this entirely – and almost forgets that radio exists at all. Para 4.85:

There have also been changes to the way TV productions are financed more generally since 2004, with the BBC using third-party funding and co-production deals to ensure the quality of their output remains high despite investing less in the content themselves.

So, for example, we hope that Ofcom don't need reminding that alternative funding streams are not available to radio drama production and that the BBC has a unique role in global broadcasting as the primary facilitator of this particular art form.

Radio drama – which has acted as an artistic seedbed for so many renowned writers – exists purely because the BBC has nurtured a unique production culture over ten decades, very much outside of the free market.

How does this relate to Ofcom's role?

We would ask that Ofcom considers seriously whether they do indeed have a role in ensuring that the BBC take special care to preserve not only the *output* of radio drama, but the *production culture* that has underpinned it for so long.

Recent years have seen an explosive fragmentation of broadcast media production, and in television, that has led to boom times in terms of TV drama with the advent of Netflix, Amazon, Sky, HBO etc. With radio, the Guild committee is concerned about the potentially deleterious consequence of what is in effect trying to spread a finite market too thinly. As 'Compete and Compare' kicks into gear there is a real possibility that some in-house production centres will be unable to sustain themselves in an open market.

In television, not only has the market for drama expanded, but BBC Studios as the 'in-house' production facility is able to offer its output to other broadcasters. Such alternatives do not exist for in-house radio production. A free market approach to radio drama means more producers fighting for exactly the same amount of output. If those radio producers are effectively forced out of business by market forces then their experience is lost, as are the artistic relationships that can shape and nurture the careers of young and more experienced writers alike.

There are positives to some output going to the independent sector – a freshness of approach, and a greater diversity of avenues for some writers – but we would argue that the accumulated culture of BBC Radio drama is irreplaceable, and that the BBC has not only a responsibility to maintain radio drama output – but also *to maintain the culture that underpins it*. A fragmented independent radio sector, while producing many exciting programmes, will struggle to maintain the collective critical mass needed to ensure the longevity of this very particular art form.

Fragmentation also has an impact on working conditions for our members, and although these specifics are beyond the remit of the Ofcom consultation, if the BBC's role in setting the benchmark for the treatment of radio writers is undermined then the fragile ecosystem will again be under threat. As sole commissioner of our art form, the BBC has a responsibility to ensure that this unique artistic community has a level of investment that makes it sustainable for professional writers – and we ask Ofcom again to remember not to make

assumptions that Radio Drama can find alternative funding streams in the way that television can.

If Ofcom agree that this is the case then it follows that Ofcom does, in this instance, have a role in ensuring that the underlying culture is not irreparably sacrificed in pursuit of goals (for example, with regard to pound-for-output productivity) ill-matched to the sole provider/commissioner function the BBC currently holds with regard to Radio Drama. In this respect, the quality and distinctiveness of the output (Question 4) is inextricably linked to the commissioning structures that underpin them and that Ofcom has a responsibility to ensure that these are preserved. It's not enough, in our view, to regulate this purely from an 'end user' perspective (Question 1), and we ask that Ofcom seriously assess and reconsider the scope of their role in this regard.

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