

making communications work for everyone

Your response

Question 1: Which factors have, since the guidance was introduced in 2004, had the biggest impact (positive or negative) on the TV production sector in the nations and regions and why? Are these different to the factors affecting London-based productions?	Confidential? – Y/N No Comment – see 35-37 only.
Question 2: What impact, if any, has the BBC's move to Salford had on the sector, and on regional production specifically?	Confidential? – Y/N No Comment – see 35-37 only.
Question 3: Do the opportunities for nations' and regions' producers vary by genre? If so in which genres is it easiest and hardest to get commissions?	Confidential? – Y/N No Comment – see 35-37 only.
Question 4: What are stakeholders' views on the impact anticipated future structural changes in the industry might have on the production sector in the nations and regions?	Confidential? – Y/N No Comment – see 35-37 only.
Question 5: In your experience does the definition of a substantive base work well in practice? If not, how could it be improved?	Confidential? – Y/N No Comment – see 35-37 only.
Question 6: Does the criterion currently contribute to the objective to strengthen regional production? If so how, if not why not?	Confidential? – Y/N No Comment – see 35-37 only.
Question 7: Are there any circumstances in which an office designated as the usual place of employment of senior or executive personnel should not be considered a substantive base? If yes, please provide further explanation.	Confidential? – Y/N No Comment – see 35-37 only.
Question 8: Does this criterion currently create any unintended consequences?	Confidential? – Y/N No Comment – see 35-37 only.

Question 9: We would welcome any	Confidential? – Y/N
information/examples from production companies on the range and roles of staff in	No Comment – see 35-37 only.
production offices outside of London.	
Question 10: Do producers tend to share space in the nations and regions in order to expand	Confidential? – Y/N
and contract in line with their commissioning slate and thus to help with costs/efficiencies?	No Comment – see 35-37 only.
Question 11: Is the production budget criterion set at the right level?	Confidential? – Y/N
	No Comment – see 35-37 only.
Question 12: What challenges do producers face in meeting this criterion? Do these differ	Confidential? – Y/N
dependent on the substantive base of the production?	No Comment – see 35-37 only.
Question 13: Does this criterion currently create any unintended consequences?	Confidential? – Y/N
	No Comment – see 35-37 only.
Question 14: We welcome any evidence/data of how production budgets for nations' and	Confidential? – Y/N
regions' productions work in practice.	No Comment – see 35-37 only.
Question 15: Is the off-screen talent criteria	Confidential? – Y/N
set at the right level?	No Comment – see 35-37 only.
Question 16: How easy or difficult is it for	Confidential? – Y/N
programme makers to fulfil the current criterion?	No Comment – see 35-37 only.
Question 17: Is there a representative enread	Confidential 2 V/N
Question 17: Is there a representative spread of nations' and regions' talent at all levels	Confidential? – Y/N
available to hire? Are there certain roles where it is not possible to fill roles from the	No Comment – see 35-37 only.
nations and regions alone? If yes, which roles and what impact does this have on production	
budgets?	
Question 18: Do broadcasters give producers the flexibility to employ the staff they want	Confidential? – Y/N
regardless of location?	No Comment – see 35-37 only.

Question 19: Which roles, if any, are most often prescribed by the broadcaster? Does this	Confidential? – Y/N
vary by genre?	No Comment – see 35-37 only.
Question 20: Does this criterion currently create any perverse incentives?	Confidential? – Y/N
	No Comment – see 35-37 only.
Question 21: We welcome any evidence to suggest whether the distribution of off-screen	Confidential? – Y/N
talent and the range of skills available has changed since this level was set in 2004.	No Comment – see 35-37 only.
Question 22: Are the three criteria used to define a regional production for the purposes	Confidential? – Y/N
of the quotas the correct ones or are there other factors that should now be included instead/ as well?	No Comment – see 35-37 only.
Question 23: How well do the criteria collectively contribute towards the	Confidential? – Y/N
sustainability of the production sector outside of the M25?	No Comment – see 35-37 only.
Question 24: Are there any unintended consequences of the criteria or guidance more	Confidential? – Y/N
widely that undermine the sustainability of the sector beyond the M25?	No Comment – see 35-37 only.
Question 25: Are the criteria too narrow? For example, are there cases of nations' and	Confidential? – Y/N
regions' productions that fail ultimately to qualify towards the regional production quota?	No Comment – see 35-37 only.
Question 26: Is the criteria-based approach	Confidential? – Y/N
the best for regulation in this area, or are other models that might work better?	No Comment – see 35-37 only.
Question 27: In your experience how big a role does London play in nations' and regions'	Confidential? – Y/N
productions and in what way?	No Comment – see 35-37 only.

Question 28: What benefits/disbenefits do you	Confidential? – Y/N
consider 'Lift and Shift' production brings to the nations and regions? We would welcome case studies/examples of 'Lift and Shift' productions.	No Comment – see 35-37 only.
Question 29: Does 'Lift and Shift' help or hinder the sustainability of production in the locality of a production and in the nations and regions more widely?	Confidential? – Y/N No Comment – see 35-37 only.
Question 30: Are there different parts of the	Confidential? – Y/N
production process which are more likely to happen in/out of London?	No Comment – see 35-37 only.
Question 31: We would be interested in	Confidential? – Y/N
receiving evidence or case studies from stakeholders which could develop our understanding of the contribution that regional productions currently make to representation and portrayal of the nations and regions in order to gain a sense of the scale of this consequential benefit.	No Comment – see 35-37 only.
Question 32: Does the process by which	Confidential? – Y/N
productions are allocated to a nation or macro-region work well in practice, or are there any other approaches you think we should consider instead? E.g. allocating proportions of one title to the different areas in which it was made.	No Comment – see 35-37 only.
Question 33: Where a production has met the	Confidential? – Y/N
three criteria in different nations/ macro- regions the allocation defaults to the substantive base. Is this the right approach or does it deliver unintended consequences?	No Comment – see 35-37 only.
Question 34: Is there anything else we need to	Confidential? – Y/N
take into consideration here? E.g. are the current nations and macro-regions the right areas to use for allocations?	No Comment – see 35-37 only.

Question 35: Are the on-screen criteria used to judge regionality appropriate, or are there other factors that should now be included instead/ as well?

Confidential? – N

The criteria are probably appropriate, but based on what I see on my ITV Anglia screen on weekdays 6pm I wonder whether the means of measurement, reporting to OFCOM, and monitoring/enforcement are adequate. Too often there are national stories – which are clearly being shown in some/all other regions in the same half hour – dressed up as regional. The day before the Grand National there was a report (by a non-Anglia reporter) previewing the National *on the basis that there are stables* in Newmarket. A few weeks ago there was a report about the sugar tax - a national issue with the only regional content being the inclusion of the opinion of a dentist from within the region. There was a recent report about the demise of Yellow Pages – a national issue – and not even the two YP covers shown in the report were for areas within the region. Earlier in the year there was a report from Kylie Pentelow promoting applications for scientists/ researchers to work at the South Pole. Did they really want applicants only from the Anglia region? (Kylie is not an Anglia reporter and the item was clearly being shown in other areas). Recently the programme started with either the Royal Birth or the name announcement (I forget which) on the pretext of 'breaking news'. If it's that important and can't wait until 6.30, do a proper national special for a couple of minutes and delay both the start and end of each regions' own programme. It's NOT regional news.

If the entire 30 minutes in those instances mentioned above and many similar ones is being counted as regional content by ITV and reported to and accepted by OFCOM then that is morally fraudulent. If it's within the guidelines then the guidelines need changing. If not, then OFCOM should demand more honest and meaningful statistics.

At the same time as these national stories are used to fill time, we in the west of the Anglia region do not get to hear at all about things such as a major fire in Great Yarmouth the other year and the collapsing cliffs in Hemsby in recent weeks/months. These things are of interest to the rest of the region as we are apt to visit these places. Better content than national stories (and its regional).

Question 36: Are the three criteria used to	Confidential? – Y/N
determine whether a regional programme was made in the area for which the service is provided appropriate, or are there other factors that should now be included instead/ as well?	No comment.
Question 37: Are there any other aspects of the regional programming section of the	Confidential? – Y/N
guidance which require more detailed review?	See 35.
Question 38: What is useful about the current 'Made outside London programme titles	Confidential? – Y/N
register' and why?	No Comment – see 35-37 only.
Question 39: Are there ways in which the Register could be improved? If yes, how?	Confidential? – Y/N
Register could be improved: if yes, now:	No Comment – see 35-37 only.
Question 40: Is there additional information which could be included in the Register to aid	Confidential? – Y/N
transparency?	No Comment – see 35-37 only.
Question 41: Are there any other ways in which we could improve the transparency of	Confidential? – Y/N
our reporting?	No Comment – see 35-37 only.
Question 42: Are there other issues stemming from the guidance that are not addressed in	Confidential? – Y/N
this Call for Evidence? If yes, please set out what they are.	No Comment – see 35-37 only.

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