

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? – N

One of the biggest factors I've seen in the research that I have done on the TV production sector in the UK has been the decentralisation of BBC infrastructure including the relocation of programme-making departments and infrastructure to Manchester in the early 2000s (Noonan 2012), to Salford in 2010 and to Roath Lock Studios in Cardiff in 2011 (McElroy & Noonan 2016). This redistribution of resources has been vital to building the capacity and talent base of regional production. While there are still some challenges (e.g. local commissioning powers and individual perceptions) this has enabled the a number of strong regional hubs to emerge across the UK in line with the ambitions of the policy.

However, whilst a policy to nurture and sustain regional production is important, and various metrics in the briefing document suggest that much has been achieved, greater tightening of the remit and tools within the policy would ensure more robust and meaningful outcomes.

Furthermore, proximity to senior decision-makers remains essential to the long term sustainability of local producers.

Question 2: What impact, if any, has the BBC's move to Salford had on the sector, and on regional production specifically?

Confidential? – N

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? – N

Part of the BBC's strategies around 'Centres of Excellence' appeared to try and create regional areas of expertise around specific genres (e.g. Cardiff for drama, Glasgow for factual

	<p>entertainment). This policy seems to be less visible in the Corporation's current strategy. While in some ways there are advantages to a strategy like this as it creates expert clusters of resources and talent (e.g. Roath Lock), we need to be cautious about the ways in which this may distort the industry and the labour market, and undermine others local expertise and local demands. This is especially pertinent in relation to the impact on Regional Programming as defined by Ofcom.</p>
<p>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?</p>	<p>Confidential? – N</p> <p>Three structural changes I see impact on the industry relevant to this consultation:</p> <ol style="list-style-type: none"> 1. BBC Studios - how will BBC Studios impact the market for production in terms of competition and how will this structure impact commissioning strategy and practices within the BBC. 2. The relocation of Channel 4 - For the relocation of C4 to be transformative to the regions, there will need to be ongoing commitment to commissioning from different macro regions. I welcome the changes in the out of England quotas for C4 in this regard and would argue for effective and periodic monitoring of this. 3. Brexit - the regions and nations of the UK are likely to feel the adverse effects of Brexit (e.g. freedom of movement). How will this impact the local labour markets and the rates of new businesses from these areas.
<p>Question 5: In your experience does the definition of a substantive base work well in practice? If not, how could it be improved?</p>	<p>Confidential? – N</p> <p>Whilst not my direct experience, anecdotal evidence given to me during my research in Wales and Scotland in particular, suggest the definition and realisation of 'substantive base' is open to misuse and undermines the long-term sustainability of the local sectors. While</p>

	<p>quantitative evidence is difficult to provide, many in the industry across the regions and nations point to examples of 'brass-plating' and insignificant office space being occupied. A few suggestions for remedying this are:</p> <ul style="list-style-type: none"> - The criterion of 'substantive base' become mandatory (along with at least one other) in order to qualify for 'outside London'. - 'Substantive base' require measurable local investments (% of senior workforce located as FTE) - Minimum terms of local presence (e.g. at least 1 year) <p>Only if production companies play a meaningful role in the long-term economic and creative life of the region should they be considered having a substantive base in that region.</p>
<p>Question 6: Does the criterion currently contribute to the objective to strengthen regional production? If so how, if not why not?</p>	<p>Confidential? – N</p> <p>As above</p>
<p>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.</p>	<p>Confidential? – Y/N</p> <p>Not to my knowledge</p>
<p>Question 8: Does this criterion currently create any unintended consequences?</p>	<p>Confidential? – Y/N</p>

Question 9: We would welcome any information/examples from production companies on the range and roles of staff in production offices outside of London.	Confidential? – Y/N
Question 10: Do producers tend to share space in the nations and regions in order to expand and contract in line with their commissioning slate and thus to help with costs/efficiencies?	Confidential? – Y/N
Question 11: Is the production budget criterion set at the right level?	Confidential? – Y/N
Question 12: What challenges do producers face in meeting this criterion? Do these differ dependent on the substantive base of the production?	Confidential? – Y/N
Question 13: Does this criterion currently create any unintended consequences?	Confidential? – Y/N
Question 14: We welcome any evidence/data of how production budgets for nations' and regions' productions work in practice.	Confidential? – Y/N

<p>Question 15: Is the off-screen talent criteria set at the right level?</p>	<p>Confidential? – N</p> <p>One of the key things which needs to be covered in the criteria is senior staff. Again, anecdotal evidence given during my research suggests that very often the production talent budget is only spent on labour occupying low grades. While I advocate the need to build the capacity of the local crew through regional and network productions, it is also important that more senior talent (e.g. writers, producers, editors) are recruited and nurtured locally. Adjustments in this criteria, to encourage more of the spend to be on these roles, would also be helpful in building the local television sector.</p>
<p>Question 16: How easy or difficult is it for programme makers to fulfil the current criterion?</p>	<p>Confidential? – Y/N</p>
<p>Question 17: Is there a representative spread of nations' and regions' talent at all levels available to hire? Are there certain roles where it is not possible to fill roles from the nations and regions alone? If yes, which roles and what impact does this have on production budgets?</p>	<p>Confidential? – N</p> <p>The information gathered here is potentially very useful in developing the capacity of the UK's television sector. I would encourage OFCOM to investigate this further (perhaps through quantitative means) and share this widely with stakeholders (including devolved governments) in order that a targeted intervention on skills development take place.</p>
<p>Question 18: Do broadcasters give producers the flexibility to employ the staff they want regardless of location?</p>	<p>Confidential? – Y/N</p>

<p>Question 19: Which roles, if any, are most often prescribed by the broadcaster? Does this vary by genre?</p>	<p>Confidential? – Y/N</p>
<p>Question 20: Does this criterion currently create any perverse incentives?</p>	<p>Confidential? – N</p> <p>Talent spend should be measured by where tax is paid rather than through an invoice system to discourage brass-plating.</p>
<p>Question 21: We welcome any evidence to suggest whether the distribution of off-screen talent and the range of skills available has changed since this level was set in 2004.</p>	<p>Confidential? – Y/N</p> <p>Mcelroy, R. and Noonan, C. 2016. Television drama production in small nations: Mobilities in a changing ecology. Journal of Popular Television 4(1), pp. 109-127. Available here: 10.1386/jptv.4.1.109_1</p> <p>Oakley, K., Laurison, D., O'Brien, D. & Friedman, S. 2017 Cultural Capital: Arts Graduates, Spatial Inequality, and London's Impact on Cultural Labor Markets In : American Behavioral Scientist. p. 1-22 Available here: https://www.research.ed.ac.uk/portal/en/publications/cultural-capital-arts-graduates-spatial-inequality-and-londons-impact-on-cultural-labor-markets(9bdd6d32-c98e-41fd-a58c-c908b7b940ac).html</p>

<p>Question 22: Are the three criteria used to define a regional production for the purposes of the quotas the correct ones or are there other factors that should now be included instead/ as well?</p>	<p>Confidential? – Y/N</p>
<p>Question 23: How well do the criteria collectively contribute towards the sustainability of the production sector outside of the M25?</p>	<p>Confidential? – N The criteria can collectively contribute however, tightening regulation and more robust auditing of reporting would ensure that the intentions of the criteria are more firmly delivered.</p>
<p>Question 24: Are there any unintended consequences of the criteria or guidance more widely that undermine the sustainability of the sector beyond the M25?</p>	<p>Confidential? – Y/N</p>
<p>Question 25: Are the criteria too narrow? For example, are there cases of nations' and regions' productions that fail ultimately to qualify towards the regional production quota?</p>	<p>Confidential? – Y/N</p>
<p>Question 26: Is the criteria-based approach the best for regulation in this area, or are other models that might work better?</p>	<p>Confidential? – Y/N</p>
<p>Question 27: In your experience how big a role does London play in nations' and regions' productions and in what way?</p>	<p>Confidential? – Y/N</p>

<p>Question 28: What benefits/disbenefits do you consider 'Lift and Shift' production brings to the nations and regions? We would welcome case studies/examples of 'Lift and Shift' productions.</p>	<p>Confidential? – Y/N</p>
<p>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?</p>	<p>Confidential? – Y/N</p>
<p>Question 30: Are there different parts of the production process which are more likely to happen in/out of London?</p>	<p>Confidential? – Y/N</p>
<p>Question 31: We would be interested in 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.</p>	<p>Confidential? – N</p> <p>McElory, R. & Noonan, C (2015) Television Drama Production in Wales. http://culture.research.southwales.ac.uk/media/files/documents/2015-11-11/Television_Drama_Production_in_Wales.pdf</p>
<p>Question 32: Does the process by which 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.</p>	<p>Confidential? – Y/N</p>

<p>Question 33: Where a production has met the 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?</p>	<p>Confidential? – Y/N</p>
<p>Question 34: Is there anything else we need to take into consideration here? E.g. are the current nations and macro-regions the right areas to use for allocations?</p>	<p>Confidential? – Y/N</p>
<p>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?</p>	<p>Confidential? – Y/N</p>
<p>Question 36: Are the three criteria used to 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?</p>	<p>Confidential? – Y/N</p>
<p>Question 37: Are there any other aspects of the regional programming section of the guidance which require more detailed review?</p>	<p>Confidential? – Y/N</p>
<p>Question 38: What is useful about the current ‘Made outside London programme titles register’ and why?</p>	<p>Confidential? – Y/N</p> <p>Ofcom should continue to publish the ‘Made outside London programme titles register’ each year as it adds to the transparency of the policy.</p>

	<p>However, the publication could be improved by harmonising the definitions and data used but the broadcasters relating to their qualifying programmes.</p>
<p>Question 39: Are there ways in which the Register could be improved? If yes, how?</p>	<p>Confidential? – Y/N</p>
<p>Question 40: Is there additional information which could be included in the Register to aid transparency?</p>	<p>Confidential? – Y/N</p>
<p>Question 41: Are there any other ways in which we could improve the transparency of our reporting?</p>	<p>Confidential? – Y/N</p>
<p>Question 42: Are there other issues stemming from the guidance that are not addressed in this Call for Evidence? If yes, please set out what they are.</p>	<p>Confidential? – Y/N</p>

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Made Outside London Review Team Ofcom Riverside House 2A Southwark Bridge Road London SE1
9HA