



**Response to Ofcom Terms of Reference for
Thematic review of representation and portrayal on the BBC
March 2018**

About RIG

- 1 The Radio Independents Group represents independent audio / radio production companies in the UK. There are around 150 such companies spread across the UK nations and regions. They make a wide range of content for the BBC in addition to some content for commercial radio, as well as for corporate clients and online platforms such as Audible and Acast.

The case for including BBC Radio services in the Review

- 2 We welcome Ofcom's work to regulate the BBC, and specifically welcome the fact that Ofcom is engaging with the radio production sector as it continues to develop its approach. However we note on this occasion that the Terms of Reference state that this exercise, as currently planned, would address BBC TV services only.
- 3 While Ofcom's responsibilities towards the commercial radio sector are broadly limited to licensing and content standards issues, the regulation of the BBC requires it to take its work on radio a step further. Our view is that in order to assess whether the BBC's radio services are fulfilling its public purposes, Ofcom needs to ensure that, unless demonstrably not relevant, any review being carried out relating to the BBC's content should include a radio element.
- 4 The BBC's radio services are every bit as unique as its TV services, in fact some would argue even more so. From the greater range of music and other programming on the music stations to the high-quality speech services of Radio 4 and 5live, the BBC provides these services for the benefit of the whole of the UK.
- 5 The BBC's Operating Licence states the following:

1.39 In relation to the United Kingdom's nations and regions, the BBC should:

1.39.1 accurately represent and authentically portray all audience groups from the nations and regions across its output, services and genres;

1.39.2 distribute its production resources across the United Kingdom ensuring that it supports the creative industries in the nations and regions. This should also include production across the regions of England and build sustainable growth for the creative industries across the United Kingdom;

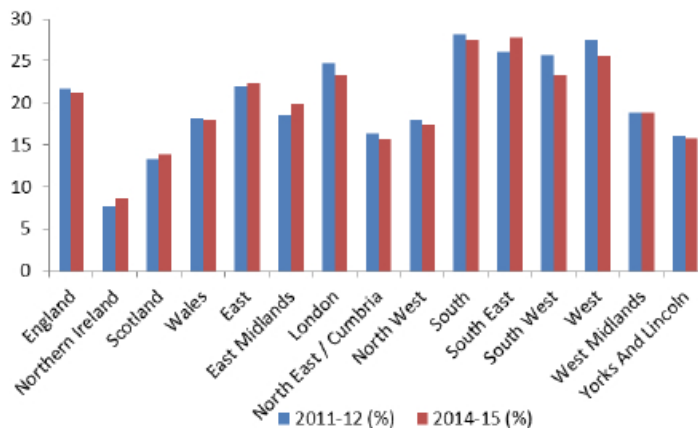
- 6 But while there are targets and quotas in place for how much the BBC spends in each nation and in the regions for TV, there is only an overall requirement for a third of content spend on network radio outside London, with a higher figure of 40% for Radio 3². This can be on either in-house or out-of-house production.
- 7 Following discussions during the drafting of the Operating Licence, RIG was told by Ofcom that rather than having too many quotas regarding radio, Ofcom would prefer to use other processes to review its radio services on aspects such as distinctiveness.
- 8 We regard reflecting the UK's nations and regions as an important part of distinctiveness, and therefore argue that the review should cover the extent to which the BBC's radio services are accurately reflecting the nations and regions of the UK, as well as enabling production companies from around the UK to have a fair chance to win commissions and bring different voices, ideas and perspectives to the BBC's radio and audio services. We note in this last regard Ofcom's statement published alongside the Operating Licence, which states:

We also expect to see output commissioned from a wide range of independent producers, to ensure a range of voices and ideas are reflected across its services. ³

- 9 As an example of the type of issue that could be examined, in the BBC Trust's last review of Radio 4 it stated that in terms of reach, the service did not perform as well outside the South East, as per this extract⁴:

16 Within England, Radio 4's reach continues to vary widely. Broadly it is much stronger across the southern regions of England and weaker in the Midlands and the northern regions. While reach levels have changed a little in each region over the past three years, it is notable that reach has grown most in the South East (together with the East Midlands). This leaves Radio 4's reach across England more uneven now than it was three years ago, with reach in Yorkshire, Lincolnshire, the North East / Cumbria lowest of all.

Table 1: Weekly reach of Radio 4 by nation and region



¹ Operating Licence for the BBC's UK Public Services. Ofcom, October 2017, p10

² Operating Licence for the BBC's UK Public Services. Ofcom, October 2017, p10, paras 2.64-2.66

³ Holding the BBC to account for delivering for audiences. Ofcom, Oct 2017, p9, para 3.17

⁴ Extract from: BBC Trust Service Review: Radio 4, Radio 4 Extra, Radio 5 live and Radio 5 live Sports Extra. August 2015, p8

10 This is a possible indication that BBC Radio 4 is perhaps not representing and portraying people in these areas sufficiently to gain their interest to the same level as the South East. We therefore argue that this review should consider whether the BBC is, through demonstrably transparent and clear commissioning processes, currently fulfilling this requirement as part of its duty to accurately reflect the UK nations and regions.

Audience Research

11 We note that Ofcom does not generally consider the role of radio in PSB provision in general vis-a-vis the lack of data contained in its annual PSB reports. We would like to see this practice reviewed in order that these reports are more comprehensive and can be used to inform those looking specifically at PSB provision in radio.

12 This is particularly pertinent given that the government is currently considering creating a fund for the creation of PSB audio content to be broadcast on commercial radio and similar platforms, partly to create greater plurality in PSB. We would suggest Ofcom might wish to take a closer look at PSB in radio in future, including carrying out appropriate audience research.

13 Regarding this specific review, we note that the BBC Trust, in its regular reviews of the BBC's radio services, would use its local audience councils to inform its views. For example the BBC Trust reported in its 2014/15 annual report that the Audience Councils felt the BBC was not fulfilling its remit in respect of its diverse audience around the UK:

*'This year Councils contributed to our service reviews of BBC music and speech radio. Members concluded that these services delivered the BBC's public purposes and, overall, served their audiences well, but should do more to appeal to the increasingly diverse audience groups across the UK.'*⁵

- *It went on to say that:*

'The need for authentic portrayal across the UK was a theme common to all Councils. Audience Council England noted the value and continuing importance of BBC local radio for the English heartland audience, while observing variations in the performance of the individual stations.'

14 We would argue that Ofcom should carry out similar research to that of the BBC Trust in respect of this forthcoming review, in order to ascertain attitudes towards the BBC's representation and portrayal of the nations and regions in its UK network radio services.

⁵ Annual report 2014-15. BBC Trust, p33