

# Consultation response form

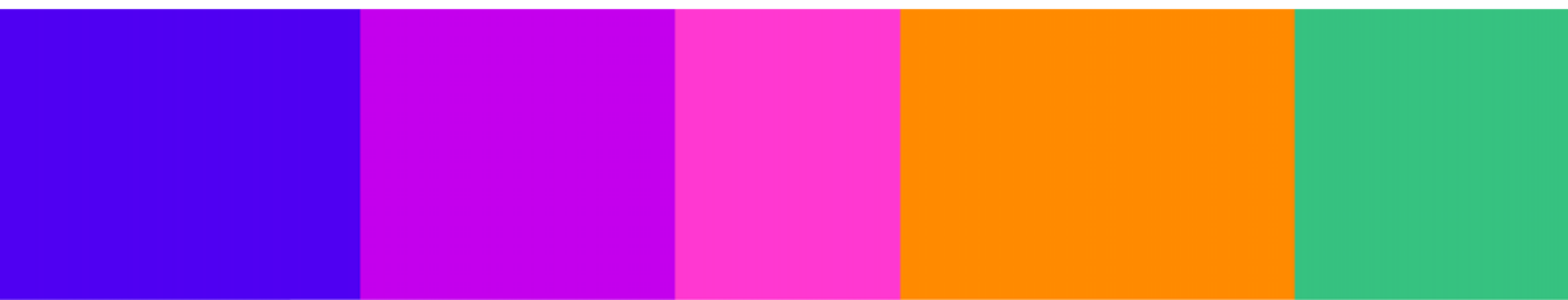
Please complete this form in full and return to [Channel4LicenceRenewal@ofcom.org.uk](mailto:Channel4LicenceRenewal@ofcom.org.uk)

Consultation title	Reconsultation: Channel 4 Licence Renewal
Full name	Ofcom Advisory Committee for England (ACE)
Contact phone number	[REDACTED]
Representing (delete as appropriate)	Organisation
Organisation name	ACE
Email address	[REDACTED]

## Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Nothing
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None
For confidential responses, can Ofcom publish a reference to the contents of your response?	n/a



## Your response

Question	Your response
<p><b>Question 1: Do you agree with our assessment of the potential impact on specific groups of persons?</b></p>	<p>See ACE response in the final section of this form.</p>
<p><b>Question 2: Do you agree with our Welsh language impact assessment?</b></p>	<p>See ACE response in the final section of this form.</p>
<p><b>Question 3: Do you agree with our proposals that:</b></p> <p>a) until 31 December 2029, in each calendar year at least 9% of the hours of programmes made in the UK for viewing on the Channel 4 service must be produced outside England, and at least 9% of the expenditure on programmes made in the UK for viewing on the service must be allocated to the production of programmes outside England and referable to programme production at production centres in Scotland, Wales and Northern Ireland?</p> <p>b) with effect from 1 January 2030, in each calendar year at least 12% of the hours of programmes made in the UK for viewing on the Channel 4 service must be produced outside England, and at least 12% of the expenditure on programmes made in the UK for viewing on the service must be allocated to the production of programmes outside England and referable to programme production at production centres in Scotland, Wales and Northern Ireland?</p>	<p>See ACE response in the final section of this form.</p>
<p><b>Question 4: Do you agree with our proposed guidance for C4C on how it should report on its MoE production in its SMCP?</b></p>	<p>See ACE response in the final section of this form.</p>

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<p>ACE Response</p>	<p>As the Advisory Committee for England, we advise Ofcom about the interests and opinions of persons living in England in relation to communications and postal matters. As a committee, we are independent and our views do not represent the views of Ofcom. Our members have experience in broadcasting, independent production, mobile and fixed telecommunications and education in the media field. We are responding to Ofcom’s consultation on Channel 4’s Made out of England (MoE) quota from the perspective of television audiences in England and those stakeholders employed by Channel 4 and its key suppliers living in England.</p> <p>As a Committee, we meet Channel 4 on an annual basis. We hear how they have served the interests of those living in England, and what aims and ambitions they have for the future. We also meet, from time to time, with representatives of independent production in England and groups representing viewers and consumers of Channel 4’s content.</p> <p>We appreciate that Ofcom is seeking to strike a balance between allowing Channel 4 Corporation greater flexibility in the future to develop its content and distribution strategy in support of its digital transformation, while continuing to secure its investment in distinctive UK content and the delivery of the core elements of its linear output on Channel 4.</p> <p>We note that Ofcom consulted in December 2023 on its proposals for the renewal of Channel 4’s licence and is now re-consulting on Channel 4’s MoE quota, proposing that, from 2030, in each calendar year at least 12% of the hours of programmes made in the UK for viewing on the Channel 4 service, i.e. its main channel, must be produced outside England, and at least 12% of the expenditure on programmes made in the UK for viewing on the service must be allocated to the production of programmes outside England and using production centres in Scotland, Wales and Northern Ireland.</p> <p>As an Advisory Committee for England, understandably we would be concerned if the proposed 12% MoE quota (a 3% increase to the existing 9%</p>

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	<p>quota) were to have a negative impact on the production sector in the English regions. We would therefore welcome reassurance that this will not be the case. In particular, in a context where our soundings suggest that amongst some indies in the English regions, because there appears to be an erosion of trust and concern about Channel 4's commissioning strategy and commitment to local indies. We also recognise that the new Channel 4 licence will run for a period of 10 years and the broadcaster's production strategy, leadership and direction could change over time, e.g. its voluntary 50% Made out of London (MoL) spend commitment.</p> <p>In relation to MoE quotas, giving Channel 4 a five-year adjustment period and to take effect from 2030, we feel that mechanisms will be required to allow Ofcom to 'police' / enforce them and that ongoing monitoring of progress would be beneficial, not just to ensure delivery of quotas but also to flag any unforeseen consequences, i.e. a negative impact on production in the English regions. We also believe that this could provide some assurance to indies in the English regions. Perhaps the best way to achieve this would be by publishing the percentage of commissions in England outside of London, alongside the levels for Scotland, Wales and Northern Ireland, on an annual basis as well as breaking it down further by location, e.g. Yorkshire, the Midlands etc.</p> <p>We recognise that the existing annual Channel 4 Statement of Media Content Policy may be the reporting and monitoring process to do that. In addition, Ofcom will be publishing a statement to conclude on the duration and conditions of the renewed Channel 4 licence in the autumn. That statement could also give assurances to indies in the English regions, giving prominence to explaining the relationship between MoL and MoE, how Channel 4's spend will be monitored and to any enforcement powers at Ofcom's disposal.</p> <p>27.08.2024</p>

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