

Reconsultation: Channel 4 Licence Renewal

The Writers' Guild of Great Britain (WGGB) is a trade union representing professional writers in TV, film, theatre, radio, books, comedy, poetry, animation, and videogames. We negotiate national, collective agreements on pay and conditions with key industry bodies, including BBC, ITV and Pact. Our members' working lives are directly impacted by the commissioning decisions of Channel 4 and so we welcome the opportunity to contribute to this consultation.

Question 1: Do you agree with our assessment of the potential impact on specific groups of persons?

We agree that the proposed increase to Channel 4's MoE quotas is likely to have a positive impact on the creative economies of the nations. However, we remain concerned that these benefits will not be equitably enjoyed as a result of the decision not to set nation specific quotas.

Although it is possible that the increases will 'improve the way that the lives and concerns of different communities and their cultures and traditions are reflected and represented to viewers', this is by no means guaranteed, as is acknowledged in the consultation documents, because there is no requirement for the work to be set in or reflect the culture of the location it is made.

We recognise the potential risk that increasing Channel 4's MoE quotas could result in less production for the English regions and/or London, which may negatively impact the creative economy and audiences living in those areas, however we believe that the demands for more equitable distribution of resources is of greater significance at this time.

Question 2: Do you agree with our Welsh language impact assessment?

Yes. We would however echo the points made by Creative Wales in their December submission that while the Channel 4 licence does not include any Welsh language conditions, it is important to recognise and acknowledge the indirect impact that collaborations between C4 and S4C can have on the generation of Welsh language content.

Question 3: Do you agree with our proposals that:

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?

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?

As a trade union representing professional Writers working across all Nations and Regions of the UK, we are concerned about the disparities in work and opportunity for those who live outside of London, including those who live and work in Scotland, Wales and Northern Ireland.

Public Service Broadcasters (PSBs) play an important role in the UK's creative ecology, offering training, development and production opportunities to writers across the country. They also have a duty to fairly represent the whole of the UK.

As Channel 4 is a PSB, we believe that its MoL and MoE quotas should, ideally, be set more equitably and in line with those set for the BBC, especially now the restrictions on in-house production have been lifted.

We reject outright the suggestion from Channel 4's that increasing MoE quotas to 16% would place constraints on its commissioning and force it to commission shows with a view to meeting a quota rather than because those shows represent the 'best possible ideas' – there is no shortage of talent or ideas in the Nations and Regions.

Similarly, we reject the arguments put forward by Channel 4 that there is insufficient capacity in the Nations to support an increase in production and therefore quotas should remain below population levels. These arguments create a "catch-22" scenario for Scotland, Wales and Northern Ireland, where a perceived lack of production capacity is seen as a reason not to commit further expenditure, when it is the lack of expenditure that prevents potential expansion of production capacity.

We note that the views of Channel 4 regarding the cost, capacity and feasibility of an increase in quotas have been challenged by the production community across all of the Nations.

However, we do recognise that these have been financially challenging times for Channel 4 and are persuaded that the channel needs more time to develop and embed changes to its operating model and prepare for a more significant uplift in quotas.

In this context, and on the understanding that this must be the first step towards more equitable production quotas in the future, we support the proposals to maintain the 9% requirement until 2030 and then increase the requirement to 12%.

However, we still believe that Nation-specific quotas should be introduced as part of these changes. Failure to do so builds instability into the National production model, restricting growth and investment opportunities for each of the Nations, whereas Nation-specific quotas promote more sustainable, consistent growth in production capacity by making funding more predictable for the sector.

Channel 4's desire for "flexibility" in commissioning should not be allowed to over-ride the public purpose of the quotas in ensuring equitable distribution of expenditure and commissioning hours across the whole of the United Kingdom.

Question 4: Do you agree with our proposed guidance for C4C on how it should report on its MoE production in its SMCP?

We agree that the proposed guidance will help improve transparency and accountability regarding MoE production. However, as stated above, we do not believe that this is sufficient to ensure equitable practice across the Nations and would ask that Ofcom reconsider its position on Nation-specific quotas.