



Response to BBC Trust consultation on BBC Document 'British Bold Creative: The BBC's programmes and services in the next Charter'.

1 Introduction

- 1.1 The Radio Independents Group (RIG) is the trade body for the independent audio-led production sector in the UK. RIG provides business affairs support, policy representation, and negotiates terms of trade with the BBC. RIG also produces the annual Radio Production Awards¹, which uniquely recognise and celebrate the production skills of radio and audio producers across the whole industry.
- 1.2 In association with the Department for Business Innovation & Skills and Creative Skillset, RIG has also established RIGtrain², a £350,000 training programme which is on course to reach more than 800 learners over a period of 18 months between November 2014 and March 2016.
- 1.3 We are pleased to have the opportunity to comment on the BBC document published in September, and hope the Trust will find the following comments of interest.

2 General views on the BBC's position statements

- 2.1 RIG agrees with many of the statements made in the document concerning the BBC's continuing importance as the cornerstone of PSB. We agree its mission to 'inform, educate, and entertain' remains valid, and find interesting the proposition of adding 'enable' to that mission.
- 2.2 We agree it should continue to fulfil this mission through providing a wide range of high quality output, though particularly in radio this needs to be from a much wider range of sources than is the case at present. On this note we welcome the BBC's statement that it needs to be 'a simpler, more effective organisation where as much money as possible goes on programmes and services'.
- 2.3 We support the premise of the BBC being universal, free-to-air and publicly funded through a licence fee which is reformed to take account of the 'iPlayer loophole'.

¹ <http://www.radioindies.org/index.php/services-open-to-all-new/rigradio-academy-radio-production-awards>

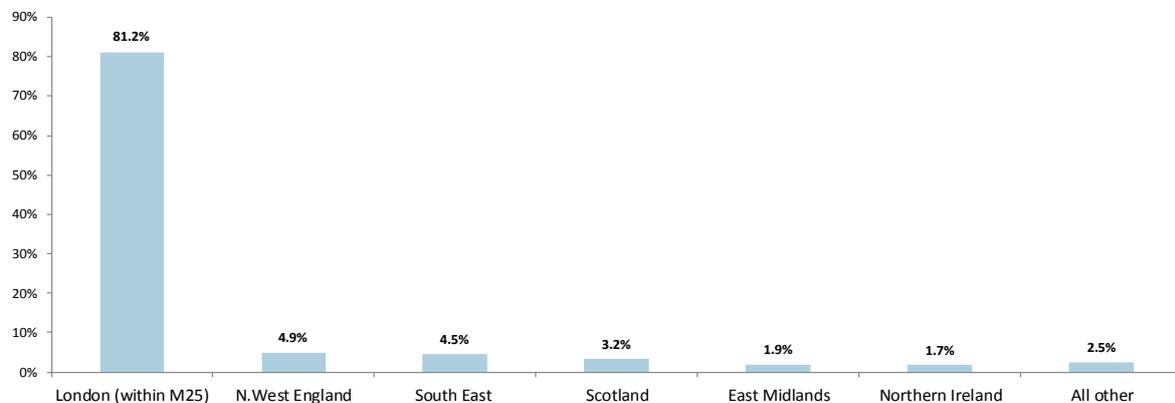
² <http://www.rigtrain.co.uk/>

- 2.4 We also support its assertion that whilst it is still a large player in the UK broadcasting ecology, it is in a changing landscape with many international media companies operating in some of the same areas.
- 2.5 However the BBC is still a large player in the UK content-commissioning market and therefore it is important that regulatory measures persist to ensure independent producers are protected. Whilst the provisions of the 2003 Communications Act, which protects a producer’s intellectual property rights, are concerned with Television, RIG negotiated its own Terms of Trade with the BBC following the Act and was able to gain a comparable set of provisions. The Act was instrumental in enabling this to happen in radio as well as television.
- 2.6 We welcome any new commitment from the BBC to working more in partnership with others, and hope that independent producers in all forms of content will be invited at an early stage to input into developing services such as the new iPlay and Ideas Service, in order that we can apply our expertise of working with many other partners to achieve the best results for the Licence Fee Payer.

3 The importance of radio and the role of the indie sector around the UK

- 3.1 Overall, we are glad the BBC emphasises the importance of its radio services, and agree with its analysis that its music services play a greater range of music, including from new acts, than commercial radio. However there is more to be done on the distinctiveness of these services.
- 3.2 The BBC document states that ‘the BBC is the best shop window to the world for British talent and programme-makers’ (p20) but this will only be true if we have moved much closer to a position where BBC Radio is commissioning the ‘best ideas regardless of source’.
- 3.3 Similarly the document claims that ‘the BBC strengthens the productive capability of the creative sector and, critically, spreads the benefits of growth across the UK’. However RIG’s recent Business Census of the indie sector showed that of the 85 companies surveyed, over 80% of the spend on those indies was within the M25:

Share of commissioned radio programming by location of main office (%)* [Source: RIG Indie Business Census 2015]



* Chart by Enders Analysis - Based on the revenues of the 85 companies which completed the RIG business census

- 3.4 RIG welcomes the plan under 'Compete or Compare' to introduce competition for 60% of hours to competition from the independent sector (p93). Crucial to making that work will be three things:
- 3.5 Firstly; a level playing field in radio commissions, where the commissioning staff are entirely separate from those running the in-house production teams, and clear processes are in place to ensure fair competition for ideas between in-house and out-of-house production teams. In addition it is important to establish a similarly level playing field between those based within and outside the M25, to ensure that a greater diversity of voice, talent, ideas and perspectives is attained
- 3.6 Secondly in the same way that the BBC is arguing for retaining a 40% in-house guarantee in radio, we would like to see a maintaining of the indie guarantee of 10%. We do not feel this is unreasonable bearing in mind the current level of indie commissioning would appear to indicate that the BBC is unlikely to want to commission less than 10% from the indie sector. However it is very important to smaller companies and new entrants to the market that they know there is a certain amount of BBC commissioning reserved for indies, and helps them to raise investment from elsewhere.

4 Radio Budgets and Genres

- 4.1 RIG also has concerns that the BBC is not sufficiently protecting some genres, eg jazz on music radio, or drama on speech radio. We note and concur with the BBC Trust, in its recent speech services review, that:

'Radio 4's content costs are higher than other BBC radio stations due to the volume of short programmes with relatively high production costs ... It is important that future budget plans do not affect the quality of Radio 4's output, particularly in new drama and comedy, where it has a unique role on UK radio'³.
- 4.2 RIG is concerned that the measures the BBC says it may have to take as a result of the recent Licence Fee deal could impact disproportionately upon radio, which has smaller budgets to begin with and we would argue is more unique in some of its services than the BBC's other services.
- 4.3 For this reason RIG is arguing in its Charter Review submission⁴ that the BBC's radio funding should be ring-fenced from the effects of any further cuts.
- 4.4 We note the BBC's plans for more individualised radio services, and for a service which provides the ability to re-play tracks played on BBC radio for a limited period

³ Review of BBC Radios 4, 4 Extra, 5Live, 5Live Sports Extra. BBC Trust, August 15, p4

⁴ Full response available at: <http://www.radioindies.org/images/2016charter/rig-cr-green-paper-response-final.pdf>

of time. Such innovations make sense in a world where people consume media in an increasingly personalised way, however curated music services remain important but the BBC needs to ensure they remain innovative. We understand from the BBC that its Compete or Compare proposals do not anticipate that, even going forward, indies will have more access to compete to make daytime shows on Radio 1 and 2. This despite the fact that, for example on 6 Music, *Radcliffe and Maconie*, made by Smooth Operations, achieves high audiences and does not disrupt that station's schedule or 'feel' in any way.

- 4.5 RIG will therefore continue to seek further opportunities to compete for daytime music shows alongside other genres.

5 Diversity

- 5.1 As stated above, simply by allowing a wide range of producers, based all around the UK, to compete for far more of its radio hours, the BBC will provide a major boost to attaining a greater diversity of voice on its services.
- 5.2 However we recognise it is also important to make sure that the creative industries are doing all they can to attract people with diverse backgrounds to be involved with producing media content.
- 5.3 We note the BBC's statement in its document that:

'We will go further with a new BBC Diversity Strategy for the next five years. For example, we want to work with the independent production sector to reach our targets and ensure diversity is at the forefront of programme-making. We will be arranging a consultation in the autumn, in partnership with PACT, to bring the sector together and explore this further. We aim to introduce new diversity guidelines for our productions in 2016.'

Such a move is clearly welcome but we fail to understand why the independent audio-led sector should not be considered by the BBC to be a worthwhile partner in this strategy. RIG has already, through RIGtrain, introduced a diversity mentoring scheme and we are looking to do more where we can to encourage people from different backgrounds to consider a career in our industry. We would welcome the BBC extending its intention to work with PACT to RIG also, as well as any other appropriate content producer trade bodies.

Radio Independents Group November 2015

www.radioindies.org