Written evidence submitted by Professor Steven Barnett, University of Westminster
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I am submitting these comments as an independent academic and commentator on communications policy at the University of Westminster. I have been involved in research and policy analysis on media issues for over 30 years, specialising in broadcasting, regulation and journalism. I have acted as specialist adviser to the House of Lords select committee on Communications for four inquiries over the last six years, twice gave oral evidence to the Leveson Inquiry, and have written several books and numerous book chapters and articles on media policy issues. My book on the BBC and its future, published in 1994, is still relevant to today’s debates.¹ My latest book discusses, in particular, the BBC’s vital role as a benchmark for quality, trust and impartiality in broadcast journalism.² This submission follows the order of questions posed by the committee in its call for evidence.

Purpose of the BBC and Public Service Broadcasting

1. It is important to start with a clear statement of what the BBC is not: it is not – nor should never be allowed to become – a broadcaster or content producer which simply provides what commercial operators are unable or unwilling to deliver. This “market gap” model – which is appropriate for most consumer goods and services – is not sufficient in the realm of culture, creativity, and citizenship where the market-place is notoriously risk-averse and uninterested in contributions to public welfare.

2. Through the provision of news, information and knowledge across each of its services, the BBC contributes to democracy with journalism tailored to specific audiences and conducted according to transparent and carefully constructed professional standards of accuracy, respect, integrity, and impartiality. Because the BBC is publicly funded, there is no commercial imperative to generate audiences through contrived confrontations or sensationalist coverage. Its only duty is to serve its audience according to a journalistic ethos and legacy stretching back to Grace Wyndham-Goldie.

3. Importantly in an increasingly global world, the BBC’s contribution also lies in maintaining a level of international coverage through journalism which is immersed in the culture and politics of other nations, thus helping UK audiences to understand better the global context for national and local issues. As global media companies progressively scale back their commitment to foreign journalism because of the strain on resources (and sometimes danger to journalists), the BBC’s continuing role becomes even more important. My own longitudinal research of terrestrial news bulletins going back 35 years has shown the BBC’s continuing commitment to foreign news in its peak-time bulletins.³

4. This commitment to foreign news is also evident on Channel 4, which has ensured that its one-hour peak-time news bulletin is frequently devoted to international stories not

covered elsewhere. Despite its commercial funding, the proportion of its bulletin allocated to foreign news remains at over 30%, just below that of the BBC’s late evening bulletin.4

5. Both the BBC and the commercial PSBs are a vital part of the nation’s economic and cultural creative force. From the beginning, a core purpose of these broadcasters has been the provision of a wide range of high quality programmes to virtually every household in the country for no more than the cost of the licence fee. That principle of universality has become all the more important as, increasingly, broadcasting is commodified and pay-TV becomes the only way of accessing certain kinds of programming.

6. The licence fee has been called a form of venture capital for the creative industries, which is both an economic and a cultural descriptor. In the television industry, we have lost £800 million of investment in original UK content since 2004 as the commercial public service broadcasters have struggled with recession and audience fragmentation. The BBC ensures a continued substantial investment in British talent and British originality: new ideas, new scriptwriters, new bands, new voices, new comedians, new on-screen and off-screen talent, available to every UK citizen. This guaranteed investment is particularly enriching in drama where commercial imperatives tend to militate against expensive UK creation and in favour of US imports. The BBC therefore provides a bulwark against an influx of cheaper American imports, and ensures that it is primarily British stories which are still told to British audiences (and available for export abroad to the very large numbers of international viewers who appreciate British content).

7. A vital role of PSB is to underwrite creative innovation: commercial television is notoriously risk-averse, with advertisers and viewers preferring the safety of last week’s resounding success to an untested drama, comedy or arts programme. The space in which to fail has given us, over the years, classics such as Monty Python, Blackadder and Only Fools and Horses as well as launching the careers of actors and writers.

8. This applies equally to music, from pop to classical. The Proms are the largest music festival in the world with the largest audiences at home and abroad. The BBC is the most important patron of orchestras in the country. Through innovations like Young Musician of the Year and BBC Introduces, it has nurtured talent and enlarged the music repertoire of both classical and popular music.

9. A vital and often forgotten part of the PSB settlement is its obligation to the nation’s children. Commercial networks find children’s television unprofitable, unless it consists of cheap American imports or cartoons. Increasingly, the BBC has become the sole patron of thoughtful, high quality programmes aimed at children which treats them as intelligent viewers rather than consumers of products and services. Providing creative programming for children is public service at its most ingenious, difficult and valuable.

10. The BBC remains the go-to communicator for great national events, part of the national fabric which is both trusted and appreciated by citizens who enjoy British celebrations – or tragedies – being interpreted through the prism of a British institution. It brings the nation together for great public occasions such as royal weddings and births, for major sporting events such as the Olympics or cup finals, for national mourning at times of tragedy, and for those critical moments in the nation’s history. In 2010, five days after one

of the most extraordinary General Elections in modern political history, only the BBC covered the culmination of coalition talks and the transition from one Prime Minister to another. Moreover, through its scale and reach, the BBC can drive people to organise in the real world: through publicising helplines, and through engagement in charitable campaigns like Comic Relief and Sport Relief.

11. Training is another area where the BBC is vital to Britain’s creative industries. While the commercial sector reduces funding to organisations like Skillset and the National Film and Television School – and increasingly exploits the willingness and sometimes desperation of young people to work unpaid – the BBC has continued to fund external training bodies as well as its own internal programmes. Its College of Journalism training website is now freely available as a learning resource to everyone in the UK.

12. Finally, one significant purpose of the BBC is frequently ignored: in an increasingly commercialised world, to provide access to information, knowledge and creative excellence which is not contingent on monthly subscriptions, exposure to advertisements, or knowledge of advanced technologies. The BBC is a public space where consumers are not measured in terms of their commercial value whose demographics and wallets must be attractive to potential advertisers. The elderly, low income, unemployed and disabled – all groups with lower than average disposable incomes – are treated on the same terms as the commercially valuable “young ABC1s”. Those uncomfortable with new technologies, who do not have Facebook pages or Twitter accounts, are treated the same as those who watch TV on laptops or listen to music via iTune downloads on social media.

**BBC performance**

13. Much of the foregoing is evidence that the BBC has fulfilled the six public purposes laid down in the Charter. Despite occasional high profile blunders, such as the Newsnight fiasco over Savile, BBC journalism continues to be the most trusted in the country, and still represents a benchmark of quality, integrity, impartiality and professionalism for the UK and the rest of the world. Audiences turn to the BBC for their news: despite producing just over one fifth of TV news output, it accounts for nearly three quarters of TV news consumption.

14. A key objective of the BBC creative policy is to invest the vast majority of its income in first run UK production, rather than cheaper foreign imports. In 2012, that investment amounted to over £1.5billion, £200m more than the combined total of the commercial PSBs and over three times more than the combined total of all the cable and satellite channels. Pay channels are built essentially on exclusive access to premium sports, films and American imports. While their investment in UK content is increasing gradually, it is small by comparison to the PSBs and is only available to those households which choose or can afford to pay.

15. In particular, investment in original UK children’s programmes is a vital part of the BBC’s contribution to national life, and increasingly important as commercial broadcasters withdraw from this area. We should not be diverted by the rising use of social media amongst the younger generation, who still engage with and are stimulated by

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5 BBC Response to DCMS Consultation on Media Ownership and Plurality, 22 October 2013.
6 Ofcom PSB Report 2013, information pack D, figs 4 and 8. Non-PSB multichannel figures from COBA.
BBC programming which provides a public, responsible space for children’s voices, needs and self-expression. One of the most successful – and perhaps least publicised – of the BBC’s educational initiatives is the annual School Report, involving 25,000 11-14 year-olds in over 700 schools throughout the country who learn the mechanics of journalism, and watch their stories being broadcast across BBC platforms.

16. There is no case for changing existing Charter purposes, which I believe are well defined and have served as good benchmarks for developing detailed service licences across the BBC. It is arguable that two further purposes, perhaps implicit in existing ones, might be made more explicit.

17. First, that the BBC should be in the vanguard of training for the kinds of creative, journalistic and technical skills required to further improve the UK’s skills and talent base. It is essential that the BBC, in making enforced cuts in services to cope with a real-terms cut in income, does not reduce its investment in training. The College of Journalism is an excellent example of a BBC-developed training resource which is now available, for example, to university journalism courses.

18. Second, although the BBC has frequently teamed up with other institutions and organisations on informal ad hoc projects, more formal partnerships have never been a requirement. As long as top-slicing of the licence revenue is removed as part of the next settlement (see below), it might be appropriate to impose a more explicit purpose to ensure that the BBC invests some of its income and expertise in formal partnerships to help foster its public service aims. Incoming Director General Tony Hall has made this one of his key ambitions over the next few years, and it might be an opportune moment to ensure that such commitments are not left to the discretion of his successors.

Scope, scale and remit of BBC

19. A BBC of size and scale inevitably makes life more difficult for commercial enterprises already suffering from a recession-led decline in advertising revenues, changing business models, and fragmented audiences. It is therefore not surprising that they should object vehemently to a well-funded, highly respected and freely available news resource, just as the NHS makes life difficult for private medical practitioners. But complaints from competitors should not obscure the cultural, democratic and creative benefits which the BBC brings to Britain across the board, whether it be in popular music, comedy, journalism, contemporary drama or Shakespeare.

20. Commercial rivals frequently claim that any reduction in BBC output would not involve a net reduction in Britain’s creative or journalistic output, because the private sector would be free to compensate. Two experiences over the last few years – in which BBC services were curtailed after objections from private competitors – contradict those claims. First, the BBC Trust ordered an end to BBC Jam, a popular and widely used education service for youngsters, after complaints from educational publishers. Second, it halted plans for BBC Local, a £68m web-based local video service that might have injected new investment into local journalism, in response to vigorous objections from newspaper publishing groups. In neither case, has there been evidence of new initiatives or investment from commercial operators. The public has suffered as a result.
21. The BBC is recognised throughout the world as one of the most enduring, influential and valuable creations of the 20th century. When giving papers at international conferences, I am frequently struck by the genuine astonishment of audiences when I describe the regular attempts to dismantle, privatise or significantly reduce the BBC. There is no evidence that the market would willingly embrace any of the creative dynamism and informational value provided by the BBC. As long as it commands almost unanimous admiration abroad and popular affection at home, there can be little point in trying to diminish such a well-respected national asset.

BBC funding beyond 2016

22. It is worth remembering that, even beyond arguments around cultural value, citizenship and global reputation, there is a very strong consumerist argument for a licence fee funded BBC, especially when set against the subscription costs of pay TV and broadband connections: that the licence fee represents astonishingly good value for money. For 40 pence per day, every UK citizen has access to four TV channels, 10 national radio stations, a network of local radio stations, and an internationally acclaimed website. With 98% of the public making use of BBC services in any one week and active choices being made through – literally – millions of switching decisions each day, it is difficult to argue against the consumer value offered by a universal licence fee.

23. There is therefore no convincing argument – in logic, public interest or consumer interest – for changing the funding mechanism. It is now accepted that an advertising-funded BBC would significantly prejudice other advertising-funded media organisations. Subscription would immediately undermine the public benefits of universality. Direct funding from the Treasury would risk direct political interference.

24. Licence fee funding therefore remains the only logical option, but at what level? The settlement in 2010, which saw BBC revenue cut by 16%, has so far been absorbed without making any fundamental service cuts, although it is clear that the scope of its journalism has suffered as a result. If the BBC is to continue as a significant national cultural and creative force into the 2020s, we cannot afford to inflict another round of real-terms cuts. It is therefore imperative that, post 2016, inflation-proofing for the licence fee is restored. This will provide the BBC with maximum stability in terms of its programme investment decisions, and ensure that no core services will need to be closed.

25. At the same time, it is equally vital that the top-slicing which was introduced as part of the 2010 settlement is removed. There is a real danger of licence fee revenue being treated as a communal source of public income from which government departments bid for any remotely relevant under-funded or unfunded scheme. The money made available for local TV, for broadband rollout and for S4C should – if government wishes to preserve them – revert to departmental funding. The World Service has now been absorbed into the domestic BBC. The quid pro quo for restoring BBC exclusivity is, as outlined above, that it should commit to financial and professional collaborations which help to fulfil its statutory purposes.

BBC governance and accountability

26. In a world in which the polls tell us that virtually every professional group and organisation – from teachers and social workers to bankers and industrialists – have
suffered a catastrophic drop in confidence, the BBC has proved astonishingly resilient, despite some shocking errors of judgement (for example, around payoffs and salaries of senior managers). This is partly because audiences understand that it is run for the public benefit, with clearly articulated public purposes established by Parliament, scrutinised according to clear and transparent mechanisms of accountability. There is no easy or perfect solution to how that accountability should operate in practice.

27. The BBC operates within a grey space between the market and the State – independent of both, but interwoven with both. When accountability – both to the public it serves and to those with whom it competes – must be reconciled with independence of editorial and creative decision-making, there will always be tensions whatever the mechanism of governance. The governors were criticised for being both regulators and cheerleaders, as is the BBC Trust, would be another regulator. It is unfortunately – or perhaps fortunately – the nature of the beast.

28. This tension would not be resolved by placing the BBC under the regulatory wing of Ofcom. It is important that Ofcom should be able to regulate the commercial sector in the best interests of competition and consumers, without the conflicting duty of regulating a public institution which by definition interferes with the commercial efficacy of those commercial operations. Moreover, asking Ofcom to regulate the BBC would give it unparalleled power within the communications field. Just as we believe in fostering a plurality of media outlets in order to diffuse communicative power, it is surely right that we should promote a plurality of regulators to diffuse regulatory power.

29. A less dangerous and more cautious option would be to reinstate the notion of a BBC Chairman, in a non-executive capacity, whose explicit purpose would be to defend the BBC from attacks on its independence. This might allow more space for the BBC Trust to pursue its regulatory function without feeling any compulsion to protect the Corporation from politically or commercially motivated attacks.

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