

A FAIRY FROM THE WAIST DOWN

HOW DO YOU SOLVE A PROBLEM LIKE CHANNEL 4 ?

Submission to DCMS Consultation:

“Increasing the Regional Impact of Channel 4”

“What is the use of being half a fairy ?

My brain is a fairy brain, but from the waist
downwards I’m a gibbering idiot.”

Strephon, in “*Iolanthe*”; Gilbert & Sullivan

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SUMMARY

On April 12, 2017, the Department for Culture Media & Sport launched a consultation to examine whether, in the interests of “stimulating creative and economic activity right across the country”, Channel 4 should be required to re-locate outside London, whether more of its programmes should be made outside the capital, and/or whether the Channel should be allowed to make larger investments in independent production companies than current regulation allows.

This submission – by a multiple award-winning film-maker, journalist and author who has produced numerous programmes for Channel 4, ITV, BBC and Channel 5 – argues that the regional issue DCMS seeks to address is the by-product of a much-wider problem: the weakening, by successive governments, of PSB requirements imposed on all the UK’s terrestrial channels.

¹ A brief biography of the author is included as an Appendix.

It suggests that to achieve its stated (and laudable) aims, the Department must first reform the overarching structure and regulation of Public Service Broadcasting in the United Kingdom; only by undertaking a fundamental restructuring can regional representation, access and spending genuinely be increased.

It further contends that for the Government to achieve its ambition for British television – “fostering diversity and creating programming which reflects and examines wider society” – it will need to return to a more rigorously-regulated Public Service Broadcasting environment.

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1. INTRODUCTION

In *Iolanthe*, Gilbert & Sullivan’s 1882 satirical comic opera, Strephon, a half-mortal, half-fairy, battles with the House of Lords for the right to marry a mortal. Strephon loudly bemoans the problem of his heritage:

“It's the curse of my existence! What's the use of being half a fairy? My body can creep through a keyhole, but what's the good of that when my legs are left kicking behind? I can make myself invisible down to the waist, but that's of no use when my legs remain exposed to view! My brain is a fairy brain, but from the waist downwards I'm a gibbering idiot.”

Public Service Broadcasting in the UK is afflicted by the same tensions as those which blight Strephon’s existence. PSB channels are simultaneously commercial entities and broadcasters with a regulatory requirement to serve the wider public interest: they are fairies from the waist down, with all the tensions and conflicting demands inherent in both aspects of their personality.

Until the last years of the 20th century these two opposing elements were held together by rigorous regulation. As successive governments loosened these bonds by ordering “light touch regulation” and by increasing commercial competition within the industry, it became increasingly difficult for PSBs to serve their two opposing imperatives.

As a result, an expansion of choice for viewers in terms of the number of available channels has coincided with a narrowing of the scope of programmes offered. Traditional public service areas – arts, religion, documentaries and serious journalism – have declined, replaced in the schedules by ‘lifestyle’ series and entertainment shows. This has undermined the broader governmental aims for public service television: to inform and educate the audience (as well as providing entertainment), and reflecting, on-screen and off, the diversity communities across the country.

2. A Little History

For its first 70 years, broadcasting in Britain marched, in step, to the instruction of John Reith, the BBC’s fearsome first director general: “inform, educate and entertain”. Reith quite deliberately placed those three commandments in that order of importance, explaining in his 1924 book, *Broadcast Over Britain*:

“To have exploited so great a scientific invention for the purpose and pursuit of ‘entertainment’ alone would have been a prostitution of its powers and an insult to the character and intelligence of the people.”

The BBC held television in a monopolistic grip until 1955. That year, the first commercial network was brought into existence by Act of Parliament. The law which gave birth to ITV was explicitly regulatory: the new broadcasting companies were granted (or, more accurately, were sold) government licences which required each to provide an independent television service to viewers in their own, carefully-defined regions. Although some of the shows they produced would be shown nationally, each licence holder was contractually obliged also to broadcast local news bulletins and programmes.

In time ITV grew to a federated patchwork of 15 regionally-based companies. To ensure they both served their local areas and provided high quality national or international programmes, each franchise was held for a specific period. Near the date its conclusion the government held a competitive tender for new licences, open to would-be rivals as well as the existing broadcasting companies.

The winners were chosen on two criteria: firstly on the quality of programmes they promised and then on the financial value of their bid. As a matter of deliberate policy, only those bids which passed the “quality threshold” progressed to the second, commercial, stage.

Thus were the two conflicting natures of the commercial television fairy bound together. And the binding produced what has been termed “a golden age of television”: alongside unashamed mass-appeal light entertainment, game shows, situation comedy and drama (in varying heights of brow), ITV also regularly broadcast arts, history and religion programmes – and, crucially, funded important public service journalism.

Two current affairs series, *World In Action* and *This Week*, occupied the best slots in the prime-time schedule, once a week throughout the year, whilst *First Tuesday*, *Survival* and *Viewpoint* offered longer-form documentaries on a rotating ‘wheel’ three weeks out of four after the News At Ten (and generally attracting audiences in excess of 3 million). Each of these series was produced by one of the ITV companies; the series’ editors were based in Manchester, London, Leeds and Birmingham respectively. Each series directly employed a large pool of dedicated staff – both production (journalists, producers and directors) and ‘craft’ (camera operators, sound recordists, film editors) in its own regions; and each series ‘spoke’ with its own distinctive regional voice, even when tackling national or – as each did frequently – international stories.

Created in 1982, the new, publicly-owned Channel 4 was similarly heavily-regulated. It was established on a unique publisher-broadcaster model – forbidden from producing its own programmes – and tasked with providing an alternative to the existing channels. This responsibility specifically included the broadcasting programming of, to, for and on behalf of minority groups or interests across Britain. And from the outset it enthusiastically adhered to this remit. David Lloyd, senior commissioning editor for current affairs, who joined from the BBC in 1986, recalled in 2007:

“One can only speculate on the temperature in the average Tory drawing room as, in the very first weeks of the Channel, a pole-axing anti-vivisection polemic like the *Animals* film wound on hour after hour from the fourth button on the TV set.”²

Whilst the upstart Channel’s schedules were not entirely swamped by iconoclastic documentaries and subtitled Polish art-house films (its opening programme was the quiz show “*Countdown*”, and one of its early – inexplicably - popular series featured pre-teen children prancing around a Day-Glo set to the strains of hit songs from the charts³), by the turn of the decade they did include regular serious public service strands.

These included “*Equinox*” (science), “*Secret History*”, “*Cutting Edge*” (documentaries) as well as the deliberately investigative (and acerbic) current affairs series “*Dispatches*”. When Channel 4 celebrated 25 years on the nation’s screens, David Lloyd read out a roll call of some of the “*Dispatches*” he had been most proud to commission.

“Candidates include South Coast Shipping for the unlawful killing of those lost in the sinking of the *Marchioness*; Sotheby’s for illegal art smuggling across Europe; Protestant paramilitaries for conspiracy to murder Catholics, all of these forming a ghostly choir of the guilty and damned.”⁴

Lloyd also presided over the jewel in Channel 4’s nightly crown – Channel 4 News. Although produced on permanent contract by ITN (which also provided news programmes to ITV), the hour-long C4 programme had some unique public service quirks built in. The first was a separate Independents’ Fund, used to pay small – generally regionally-based – independent producers to make distinctive short news films for the programme; the second was that Channel 4 contracted a separate independent production company in Leeds to operate the News’ northern bureau.

² David Lloyd speech on The Future of Channel 4; 2007. City University Department of Journalism webpage: http://www.city.ac.uk/_data/assets/pdf_file/0009/85932/DavidLloyd_on_Channel4t.pdf

³ “Minipops”; Mike Mansfield Productions, 1983

⁴ David Lloyd, 2007: *Op. cit.*

Both of these elements helped Channel 4 meet its remit requirements, both in terms of reflecting the interests of Britain's regions and in helping to sustain production companies outside London.⁵

3. The Long, Slow Death of Public Service Broadcasting

Two events changed the face of Public Service Broadcasting. The first was a new Broadcasting Act in 1990 which, *inter alia*, abolished the "quality threshold" for awarding ITV licences; henceforth these were to be awarded to the highest bidder, regardless of the quality of programmes they promised to broadcast. The second was a change in Channel 4's funding: from 1993 it would sell its own advertising (previously ITV had been responsible for this).

Together – though not precisely simultaneously – these changes led to a diminution in the scope and frequency of traditional Public Service programmes. Gradually ITV dropped much of its science, arts and religion strands and began to replace its award-winning documentary and current affairs series with reduced runs of less serious programmes, while Channel 4 shifted its focus by increasing the number of American entertainment shows in prime-time and concentrating on mass market subjects for what it began to refer to as "factual" programmes.

This dilution of both networks' public service remit did not take place overnight: throughout the 1990s both ITV and Channel 4 continued to broadcast high-quality PSB programmes (albeit fewer in number). But by the start of the new millennium, encouraged by government orders for the industry regulator to impose only a "light touch" supervision, "reality" formats such as *"Big Brother"* and "factual entertainment" shows devoted to property make-overs and lifestyle features dominated the prime-time schedules. Religion and arts disappeared almost entirely, and "flashing blue light" police or hospital series displaced serious national or international documentaries. Current affairs strands were likewise affected: on ITV the painstaking investigations of *"World In Action"* and *"This Week"* were replaced by the lighter "consumerist" or celebrity-centric approach of *"Tonight With Trevor McDonald"*.

⁵ Declaration of interest. I made 11 films for David Lloyd, two for "Secret History", one for "Equinox", and was commissioned on eight occasions by the Independents Fund.

Channel 4, having moved away from the fringes and into the mass market was by then in direct commercial competition with ITV: both were competing for the same advertisers; little wonder, then, that by 2007 David Lloyd lamented that:

“The Channel we witness now ... is a timid institution by comparison whose schedule reads as part of the PROBLEM of British television rather than its salvation, a Channel, in short, that has survived for so long only by the forfeiture of its principle and its purpose ...

“Once Channel 4 News is out of the way we struggle through yards and yards of documentary formats or narrative features. You know the ones I mean: I refer to them only by their generic intent rather than their precise titles – ‘How Crap is your House ?’, ‘How Crap is Your House - Home or Away ?’ , ‘How to Look Naked For Ever’, ‘Loudmouth Twerps Can Cook’, ‘Can you Shag Ragged ?’. It is not so much the sheer banality of much of this formatting which appalls, as the sheer predictability and inconsequence that is integral to their design. And isn’t it the ultimate insult to the founding ethics of Channel 4, founded as it was on the capacity to surprise us ?”⁶

This retreat into stupidity was not – at least officially – sanctioned. Channel 4 was, in theory, still required to provide a broad range of programming which “demonstrates innovation, experiment and creativity in the form and content of programmes; appeals to the tastes and interests of a culturally diverse society; makes a significant contribution to meeting the need for the licensed public service channels to include programmes of an educational nature and other programmes of educative value; and exhibits a distinctive character”.⁷

In reality, Ofcom turned a blind eye while the Channel abandoned this remit in favour of programmes commissioned with the sole and specific intention of generating mass audiences (or, at least, achieving a significant share of the available audience in their slots). Channel executives openly described these as “cynical commissions”.

⁶ David Lloyd, 2007: *Op. cit.*

⁷ Communications Act 2003

Thus, by 2008, David Lloyd's successor as commissioning editor for "*Dispatches*" felt able to pronounce that the series would focus almost exclusively on British stories (a maximum of two international films per year were to be allowed, but even these had to deal with countries – more specifically wars – with which the audience was already familiar).⁸ A year later the same commissioner justified his unwillingness to consider a serious investigation into safety concerns about passenger planes put into service by Boeing, the world's second-largest aircraft manufacturer, on the grounds that "*Dispatches*" couldn't "make allegations about a well-respected international company".⁹ It didn't matter that these allegations were supported by a wealth of documentary evidence: the presumed legal costs of defending a film which would not deliver sufficient audience share meant it was not worth even examining them.¹⁰

4. The Emperor's New Clothes

Channel 4 and ITV insist that they remain committed to Public Service Broadcasting. Both argue that they meet – and generally exceed – the few remaining quotas for specific genres of PSB programming laid down by Ofcom.

These claims are – at best – specious.

The networks' own websites show that they now broadcast almost no arts, history or religious programmes, and that the other two staple elements of PSB factual television - current affairs and documentaries – lack any ambition other than achieving significant audience share.

In terms of current affairs – defined by Ofcom as "a programme which contains explanation and analysis of current events and ideas, including material dealing with political or industrial controversy or with public policy"¹¹, ITV's "*Tonight*" strand is populated by programmes with titles such as "*Brits Abroad: Is the Dream Over ?*". "*Help – Stop me Ageing !*" and "*The Secrets to Youthful Skin*".

⁸ Kevin Sutcliffe; meeting with regional independent producers in Leeds.

⁹ Kevin Sutcliffe; e-mail to the author, 2009

¹⁰ The film ("On A Wing and A Prayer") was ultimately commissioned and broadcast by Al Jazeera in 2010, and subsequently won a major international broadcasting award. No legal action ever ensued.

¹¹ Ofcom, 2006

Channel 4's "*Dispatches*" (which no longer occupies a regular, let alone permanent, slot throughout the year) does occasionally manage what appears to be investigative journalism: however, on closer inspection much of this is "undercover footage" in which a well-known company's low-level employee or junior manager is caught making a stupid, insensitive or ill-judged remark. This reached its nadir with an "investigation" of the low cost supermarket Aldi which breathlessly revealed one store stocking a few items of salad past their sell-by date and another in which the staff emergency exit was temporarily blocked by a storage trolley.¹² Woodward and Bernstein it wasn't – but the Channel pronounced the programme to be the cutting edge of serious investigative journalism.

It displays the same sanctimonious self-regard over its documentary output (although this has been blandly re-christened "factual"). In addition to the endless swathes of 'property porn', 'benefits porn' and sex-based programmes – all marketed as addressing serious social issues, but which are, in reality, cynical attempts to grab large audiences by inviting viewers to condemn, pity or excoriate their subjects (sometimes via a heavily-promoted live-streamed Twitter feed) - the Channel claims to meet its Public Service remit by dressing up entertainment and game shows in a shabby cloak of *faux*-seriousness.

Thus, in Channel 4's most recent self-assessment, Deputy Creative Officer Ralph Lee pronounced:

"A key part of innovation for us has been breaking genre boundaries ... We have broken open what were very defined programme genres to much more open and hybrid ways of working. As a result we are seeing more 'intersection' ideas like *Hunted*, *SAS: Who Dares Wins*, *Supervet* and the *Secret Life of Four Year Olds*"¹³

¹² "Aldi's Supermarket Secrets", November 2015

¹³ Channel 4: "Our Programmes", 2015. <http://annualreport.channel4.com/downloads/Our-programmes.pdf>

This corporate “New Speak” should come with the following translation: *‘We know that entertainment constructed reality formats get bigger audiences than genuine documentaries or current affairs. So we will simply re-brand our game shows, sexploitation programmes docu-soaps and lazy consumer “investigations” as innovative “intersection” programming and claim them as part of our PSB remit.’*

This is not to say that the Channel has completely abandoned serious public service programmes: but important and ambitious films such as *“Escape from Isis”* and *“Syria’s Disappeared”* are the rarest of exceptions to a commercially-driven rule which floods the schedules with cynical attempts to garner mass audiences. In some of the most turbulent times in recent British history, for example, *“Dispatches”* posed such vitally important questions as “will boiled rice kill me ?”¹⁴ or “how safe is my sandwich ?”¹⁵. Meanwhile Lee’s department commissioned a succession of tawdry “carry on up the very British brothel” sexploitation shows. In essence, Channel 4’s output has evolved into a television version of the *Daily Mail* – a very far cry indeed from its notional remit.

Successive governments and their regulators have allowed this dilution of genuine PSB content. It is long past time for Ofcom, which (in theory) polices broadcasters’ adherence to their remit, to shout out that the new Emperors - ITV and Channel 4 – are not, as they claim, displaying fine public service fashion wear: they are rather completely PSB-naked.

5. The Shrinking Geography of Public Service Broadcasting

It is not only the breadth of subject matter which has been diminished: the important PSB element of regional production has all but disappeared.

Ofcom permitted ITV to amalgamate its regional franchises into a single London-based and London-centric entity: the once distinctive voices of Manchester, Leeds or Birmingham-based series have been replaced by programmes commissioned in the capital and largely made by production teams located inside the M25.

¹⁴ No.

¹⁵ Very.

Channel 4 has followed suit: all commissioning decisions are made in Horseferry Road and Channel 4 News no longer maintains a northern bureau run by a regional independent company.

Instead, Ofcom permits the channels to use a false measure of compliance to justify claims they are meeting regional quotas. This, primarily, boils down to accepting that because a production is filmed outside London, it qualifies as part of the regional remit. The fact that, in most cases, the production company is London-based, its teams largely live and work inside the M25 and the editing takes place in Soho, is cheerfully ignored. This, too, is *faux*-compliance: if, as its consultation paper claims, DCMS genuinely wishes “to open a new chapter of success and public service for Channel 4 where it makes a greater contribution to the regions beyond London and the South East”¹⁶, it needs to instruct Ofcom to enforce genuine regulation.

6. The Broadcasting Ecology

It is heartening to see government ministers adopt (after years of failing to understand this) the description of public service broadcasting as an eco-system. By definition, this means that the actions of one PSB channel will affect the existence of the others.

The loosening of regulatory bonds on ITV had a knock-on effect on Channel 4. It duly responded by reducing its exposure to risk – for which read lower audiences and advertising revenue – and migrating away from its remit to the safer middle-ground.

But the chain of consequences does not stop at Horseferry Road. Whilst the BBC does not need, financially, to chase audience share, the compulsory tax which is the licence fee, ensures that it is under constant political pressure. Whenever its programmes – in whatever genre – are beaten in the ratings this pressure increases. Accordingly, as ITV and Channel 4 have become less PSB-oriented and more nakedly commercial, the BBC has felt it necessary to follow suit.

¹⁶ “Increasing The Regional Impact of Channel 4 Corporation”; p.6

The result is the homogenization of programmes on public service television. It is now almost impossible for even experienced producers to know whether an idea is suitable for Channel 4 or the BBC. For the viewer, apart from recognizably-channel specific presenters, there is no perceptible difference between the programmes on BBC1, ITV and Channel 4.

This homogenization reached its apogee with the ‘capture’ by Channel 4 of the BBC hit entertainment show, “The Great British Bake Off”. Leaving aside the (legitimate) question of how poaching an established light entertainment format lives up to Channel 4’s alternative voices remit - let alone how a network which believes it cannot invest in genuine PSB content can afford a three-year £75 million deal - nothing so clearly epitomizes the interchangeable, identikit nature of programmes on all PSB channels. On this – as on so much else concerning public service broadcasting – DCMS and Ofcom have been silent.

7. Shooting The Canards

The broadcasting industry claims there are two fundamental reasons for the dilution or limitation of its PSB efforts. Both are canards which need to be shot down.

The first claim is that the cost of programme-making has increased. Whilst it is true that programme budgets have (slowly and not in all genres) increased over recent years, the actual costs of making programmes have radically decreased. Thirty years ago most non-studio programmes were shot on 16mm film. This was expensive and required specialist processing. Just as videotape replaced film from the late 1980s to the end of the century, today programmes are recorded on inexpensive and re-usable digital memory cards which require no specialist processing before editing. The cost savings on this alone are vast.

Crew costs have also been slashed. Again, thirty years ago it was not unusual for a location documentary shoot to involve a crew of between five and ten specialist craftspeople – camera operator, camera assistant, sound recordist, assistant sound recordist, electricians for the lights, grips for driving – as well as a substantial production crew of producer, director, researcher and PA.

Today, two-person crews – camera operator and sound recordist – are viewed as a largely unaffordable luxury. Vast swathes of programme content are shot on ‘prosumer’ equipment (a half-way house between domestic camcorders and professional cameras) by researchers or assistant producers; these are freelance workers (since the industry has become almost entirely casualised) who are required – for no extra pay – to perform all the duties of specialist film crews as well as handling production responsibilities. The results in production costs which are a fraction of what broadcasters used to pay for putting a large team of staff professionals on the road.

Post-production – editing in layman’s terms – has also reduced dramatically in price. Where once an analogue film edit suite involved at least two people – film editor and assistant – and very expensive specialist equipment, today’s programmes are edited digitally on cheap domestic computers – often by same producer or researcher who has shot the footage.

But if these costs have been slashed, why do production companies and broadcasters claim the price of programme-making has increased ? The answer is simple: production companies now routinely cream off much larger slices of the budgets – 30% is far from unusual – as profit or ‘overheads’. Higher programme budgets are used to make a few company directors richer, not pay for better programming.

The second great canard is that audiences for public service broadcasters have been lured away either by the explosion in non-PSB commercial channels or by the delights of the internet. Both of these claimed reasons are specious.

Whilst audiences have indeed reduced, research for ITV has repeatedly shown that the plethora of commercial channels attract only a tiny proportion – a few per cent at most - of the available audience on any given night.

This is not in any way surprising: most of those channels on the lower rungs of the EPG do not fund original production, relying instead on buying in cheap repeats, primarily from the US. And there is a limit to the number of times even the dumbest viewer will sit through repeats and re-repeats of “*Dog, The Bounty Hunter*” or even “*QI*”.

Similarly, whilst it is true that sizable numbers of previously loyal TV viewers now spend their evenings in front of internet-enabled devices – tablets, phones and computers – there is a reason for this. The millions of viewers who consumed the serious fare broadcast by the likes of “*World In Action*”, “*This Week*”, “*First Tuesday*”, “*Viewpoint*” and “*Survival*” are simply not being offered the sort of quality television programmes which once claimed their attention and loyalty.

Almost any other industry would realize this. A manufacturer of baked beans which changed a successful recipe and saw sales slump would, unquestionably, connect the two facts. Unaccountably, British broadcasters have abandoned genuine and successful PSB fare in favour of dull, formulaic reality, property or lifestyle ‘shows’ but stubbornly refuse to accept that this has any relationship to reduced audiences.

8. A Way Forward

There is – or once was – a valid criticism of some PSB documentaries and current affairs films: that they pointed an accusing finger at a problem without troubling to suggest a solution.

This paper does not make that mistake. The DCMS consultation may be too narrowly focused on the regional question, but it offers a very much-needed opportunity to re-examine and then re-calibrate public service broadcasting in a world increasingly-dominated by non-traditional media and Trumpian “alternative facts”.

If, as the foregoing has suggested, public service broadcasting in Britain is either dead or severely unwell (whilst claiming, of course, to be in the peak of positively perfect health), how can it be brought back to meaningful life ? There is an answer – but it depends on an acceptance that the prevailing neo-liberal orthodoxy of measuring PSB success by audience figures, audience share and – most dangerously of all – by financial profit is both wrong and counter-productive.

The fundamental point of Public Service Broadcasting is that it should provide programming which is unlikely to be offered by non-PSB commercial television stations. That necessarily means accepting that it may (repeat: may) attract – at least initially – smaller audiences.¹⁷

However, the broadcasting landscape is now littered with channels each seeking a slice of advertisers' limited pot of money. Whereas in 1992 Bruce Springsteen was able to sing (with justification) that there were "*57 Channels and Nothin' On*", a quarter of a century later the typical British television boasts an EPG with several hundred available channels. (The second half of Springsteen's observation remains, sadly, apposite). Added to this, advertising has begun to migrate away from television to on-line 'new media' platforms.

This price for creating this brave new landscape is that British television can no longer afford four (notionally) public service broadcasters¹⁸. If DCMS is serious about ensuring the future of PSB it needs to carry out a root-and-branch restructuring of this part of the media ecology.

This paper – informed by three decades of hand-on programme-making for all British PSBs as well as international broadcasters – argues for the creation of a new model of just two genuine – and genuinely-regulated – PSBs: one provided by the BBC and one by a not-for-profit, regionally-based (or, at least, federated), commercial rival.

¹⁷ It is something of a broadcasting industry myth that serious PSB programmes did not attract substantial audiences. As a former "First Tuesday" producer-director I can attest to the fact that its hour-long films – broadcast at 10.35pm once a month – drew average audiences of between 2.5 and 3.5 million. Those viewers have not – by and large – died. At present they simply have nothing worth watching. Concerted effort could, in time, re-claim them.

¹⁸ This figure counts BBC 1 & 2 as one broadcaster with Channel 5 filling – however confusingly – the fourth spot.

9. The New PSB Model

- (a) Britain should have two public service broadcasters. A new charter regulating each should clearly and unequivocally define PSB as being substantially concerned with the commissioning and publishing of programmes which would not be commissioned by a non-PSB commercial broadcaster.
- (b) However, the charter should also make clear that successful PSB requires a rich and balanced diet containing all three Reithian elements: information, education and entertainment.
- (c) The charter should mandate the provision of a non-negotiable allocation of weekly prime-time hours for programming in the fields of current affairs, documentary, history, arts and religion.
- (d) It should also require both PSB's to broadcast at least one hour of news in prime-time. The commercial PSB's prime-time news-hour should be required to be free of advertisements or other non-news breaks (eg: promotions or 'teases' for other programmes) since these can distort genuine journalistic values and lead to bulletins padded out with celebrity interviews or gossip.
- (e) The licence for the new single commercial PSB should be granted – free of any fee – on the basis of an initial “quality threshold” and subsequent evidence of financial sustainability.
- (f) The single new commercial TV PSB licence should be put out to tender. The primary criteria for a winning bid should be the breadth and quality of programmes, and the closest match to the government's stated socio-geographic aims. Each of the current PSB licence-holders – as well as any interested company which does not currently operate a media business– should be invited to bid.

- (g) A fundamental requirement of the licence should be that the successful company must be– or must commit to becoming within two years – either 95% permanently regionally-based *or* be formed of a federated group of regional broadcasting companies.
- (h) Since the evidence of previous government attempts at increasing regional input and impact have highlighted the ease with which such targets can be manipulated so as to appear to be met¹⁹, the licence should unequivocally require all key decision-makers (including, but not limited to, series editors, commissioning executives and schedulers) to live, full time, in the regional location).
- (i) Funding for the BBC would continue via the licence fee. The new, commercial PSB would be funded by advertising, supplemented by a Public Service Support Levy imposed on all other non-PSB channels, networks or stations licensed to broadcast in the UK.
- (j) To ensure that all executives (and, in the case of the commercial PSB, owners) are not tempted by the crack cocaine of mass audience figures, the charter should ban bonuses or other “performance incentives”.

10. Conclusion

DCMS’ review of the possibility of moving Channel 4 (or parts of it) outside London offers a rare chance to halt the slow, miserable death of Public Service Broadcasting in Britain.

A genuine and fearless re-calibration – re-structuring the entire PSB ecology for the post-analogue age – could achieve the regional goals set by DCMS – and ensure a renaissance in genuine Public Service programming.

¹⁹ The transfer of BBC programmes and departments from London to Salford may have been a commercial success for Manchester, but the key commissioning and scheduling decisions – and, often talent – remain stubbornly locked in White City or Portland Place.

If, instead, DCMS merely tinkers with the edges of a broken system by imposing new regional requirements on to the existing (malfunctioning) structure of Channel 4, it is a racing certainty that the channel will simply find ways to weasel out of these impositions by creating *faux* changes which neither fulfill the stated aims nor improve the quality of PSB programming.

Is this re-calibration likely to happen ? Bluntly, no. No British government for the past 30 years has had anything approaching a vision (let alone a coherent policy) for the broadcasting industry. Despite its importance – to the economy, to the cultural life of the nation and in fostering an informed electorate – broadcasting has, since (and on the insistence of) Margaret Thatcher, been abandoned to the market.

But the market's overriding duty is to one thing and one thing only: profit. Assuming – and since there is no empirical evidence to support this, it is an assumption – that in some vague way market-driven companies will seek to find a way of serving both the interests of shareholders and the public good without rigid regulation – is naivety of truly Panglossian²⁰ proportions.

The concept of public service broadcasting is, and always has been, a fairy from the waist down: a nourishing mix of the commercial and popular (entertainment) with genuinely educative and informative programmes. The lesson of the past 30 years is that unless these two contradictory imperatives are tightly bound together by stringent regulation, the commercial will always edge out the more serious.

The only responsible conclusion is that DCMS should seize this opportunity to re-make the entire PSB eco-system in the interests of the entire country – those who work within the industry, those who sell its products abroad, and crucially those who watch its programmes.

²⁰ Prof. Pangloss, in Voltaire's satire *Candide*, believed – against all available evidence - that “everything is for the best in this best of all possible worlds”.

Appendix: Author's Biography & Qualifications

Tim Tate is a multiple award-winning documentary film-maker, investigative journalist and best-selling non-fiction author.

He began his career in local and regional newspapers in 1978, then moved to BBC Radio 4 before joining the Central Television ITV franchise in 1985. He has produced and directed films for all British terrestrial channels – BBC 1, BBC2, ITV, Channel 4 and Channel 5 – as well as Sky, Discovery, A&E Networks and Al Jazeera. In 2016 he retired from television after 32 years and almost 90 films.

Tim's work has been honoured by awards from Amnesty International, the Royal Television Society, the New York Festivals, UNESCO, the Association for International Broadcasting and the US National Association of Cable Broadcasting.

He has written for most national newspapers and is the author of 13 published non-fiction books. Three of these spent many months on the best-sellers lists.