

*Championing  
excellence and diversity  
in broadcasting*



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**RESPONSE BY THE VOICE OF THE LISTENER & VIEWER  
TO THE BBC CONSULTATION  
A NEW BBC THREE CHANNEL:  
PUBLIC INTEREST TEST CONSULTATION**

**April 2021**

## INFORMATION ABOUT THE VLV

1. The Voice of the Listener & Viewer (VLV) is an independent, not for profit membership-based charity, free from political and sectarian affiliations. VLV supports high quality broadcasting which maintains the democratic and cultural traditions of the UK. We support the independence and integrity of the BBC and encourage work which demonstrates commitment to the principles of public service broadcasting (PSB). VLV is a charitable company limited by guarantee (registered in England and Wales No 4407712 - Charity No 1152136).

## INTRODUCTION

2. VLV welcomes the opportunity to respond to this consultation on restoring BBC Three as a broadcast channel.
3. VLV welcomes the proposals set out in the consultation document, however we have a concern that these proposals abandon a highly valuable aspect of BBC Three's programming – international content which fulfils Purpose 1 of the Charter.
4. In 2015 VLV opposed the closure of BBC Three as a broadcast channel because we believed this would limit the reach and impact of its content and undermine the BBC's ability to engage fully with younger audiences.
5. VLV therefore welcomes the proposal to reinstate the BBC Three broadcast channel, while continuing to provide content on the iPlayer because this will help it better engage the young adult audience. It is important that this sector of the audience is fully provided for as part of the BBC's mission to provide content for the whole population of the UK.
6. VLV values the contribution BBC Three has made by engaging all audiences, especially younger adult audiences, with issues which are important to all of us, delivered in a style which is innovative and engaging. BBC Three is notable for providing a range of content which reflects UK culture and issues of concern to young people in the UK.
7. In addition to this content, which reflects UK issues and concerns, BBC Three has been particularly successful at innovating with content which broadens our understanding of the world through its current affairs output which has been distinctively different from other current affairs programming available on television in the UK. It is presented in a more direct and engaging way than traditional current affairs and is 'gritty' as well as human.
8. As the dominance of the global SVODs grows, it is increasingly important that the BBC focuses on providing innovative and distinctive UK content. It is notable that some of the most distinctive UK programmes in recent years have gone out under the BBC Three brand. These include *Fleabag*, *This Country*, *Angels of the North*, *The Young Offenders*, and Reggie Yates and Stacey Dooley's investigations.

9. In general terms, VLV welcomes the proposals for BBC Three to drive reach and help deliver universality<sup>1</sup> as set out in the consultation document.

**Question 1: What do you think about the potential public value of our proposals for a BBC Three broadcast TV channel, including the extent to which our proposals contribute to the BBC's mission to serve all audiences through the provision of high quality and distinctive output and services which informs, educates and entertains?**

10. VLV believes that if BBC Three returns as a DTT channel which is free at the point of consumption, this will deliver greater public value than it does currently as an online service. Online services are not universally available and universality is one of the principles of public service broadcasting in the UK.
11. VLV would wish to see BBC Three provided with a channel slot within the first 24 slots of the general entertainment section of EPGs.
12. While VLV believes that the BBC Three broadcast TV channel will provide better value for audiences, we are however concerned by the omission of reference to Purpose 1<sup>2</sup> (news and information) in the proposals.
13. The lack of articulation of how BBC Three will deliver this purpose partly undermines the public value of the proposals. VLV is concerned that perhaps Purpose 1 is perceived as being mostly concerned with news output. However, VLV notes that Purpose 1 also requires 'current affairs and factual programming' which helps 'people understand and engage with the world around them'. It is clear in the 2016 Charter that the BBC should *seek to reach and serve all audiences with this output*<sup>3</sup>. VLV would urge the BBC to reconsider its proposals so that it ensures that the proposals for BBC Three specify how delivery of Purpose 1 will be achieved.
14. While VLV understands the BBC's priority to ensure that BBC Three output is representative of young people from across the UK, providing a mirror for them to see themselves and their lives reflected<sup>4</sup>, we are disappointed by the lack of ambition to provide content which addresses global issues or which might help broaden the horizons of younger adult audiences beyond the UK. Many issues of concern to young people in the UK today are global issues. Viewing issues and stories solely through a UK prism, which is the approach implied in the proposals, would be a very strange approach when aiming to engage a generation of viewers who are more globally connected than any generation before.
15. VLV accepts that under current circumstances it is not possible to film abroad, however it is hoped that in due course foreign travel will be practical. VLV does not consider that current Covid restrictions should preclude the BBC from including international content in the proposals for the BBC Three TV channel.
16. VLV is not overly concerned that BBC Three should provide news bulletins, but, as stated above, we are concerned that current affairs and documentaries which help the BBC Three audience understand and engage with the world around them should be included within its remit.

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<sup>1</sup> *A new BBC Three channel: Public Interest Test consultation*, BBC, 5 March 2021, para 13.1.6

<sup>2</sup> BBC Charter, December 2016, clause 6 (1)

<sup>3</sup> BBC Charter, December 2016, clause 5

<sup>4</sup> *A new BBC Three channel: Public Interest Test consultation*, BBC, 5 March 2021. The strategy appears to focus mostly on 'representing and portraying authentic voices and experiences across the whole of the UK', para 1.4.

17. BBC Three's innovative factual and current affairs programming has been one of its great successes. From its inception it developed a new model of programming which both engaged younger audiences with the world around them and provided audiences with a deeper understanding of other cultures and countries, mostly delivered through current affairs and factual programmes such as *I am Greta*, *Trump in Tweets*, *Dirty Streaming: The Internet's Big Secret*, *Inside the Real Saudi Arabia: Why I had to leave* and Stacey Dooley and Reggie Yates' international documentaries. In our view this is some of the most distinctive and valuable content which BBC Three provides.

18. There is extensive research which demonstrates that young people in the UK have an appetite for content which connects them with the wider world. They are interested in global issues and *less aligned with traditional notions of sovereignty or concerned about migration as are their older counterparts*<sup>5</sup>. As the first wholly digital generation, they are more connected with the wider world; they are also concerned about issues such as climate change, which are global rather than domestic issues:

*As the most digitally-connected generation, it is unsurprising that the majority of young people have an international perspective, and see no contradiction between their British and global identities. Young people in the UK worry about their country's position in the world and what that means for their future. Many do not have opportunities for international engagement, and those who do see their chances threatened by the UK's departure from the EU.*<sup>6</sup>

19. In this context BBC Three has an important role to play in both providing content which meets the needs of this 'global generation', which encourages and inspires them to look beyond the UK and helps explain the UK's position in the world.

20. Ofcom Omnibus research carried out for the PSB Review in 2020 examined two different aspects of the value of content – its *personal* value and its *societal* value. The research looked at responses from older and younger citizens, comparing the two sets of data.

21. Drawing on the data for 16-24 year olds, content which helps us understand the world around us was the third most popular category out of 15 types of programming (22%). The most popular was trusted and accurate UK news (33%), followed by programmes 'to watch with family and friends' (25%).<sup>7</sup> In contrast, content which 'features people like me and places I know' only scored 5% among this age group and programmes 'for me' only scored 15%, implying that they are more interested in the wider world than they are in seeing their own lives reflected back at them.

22. Societal Value: The same research shows that when considering which benefits are most valuable to society 16-24 year olds chose the following as their top 4 priorities: accurate UK news (34%), programmes which reflect the diversity of the UK (30%),

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<sup>5</sup> *A Generation Apart: Were younger people left behind by the EU referendum*, Common Vision, Caroline Macfarland and Katie Owen, July 2016. <http://covi.org.uk/wp-content/uploads/2016/07/A-Generation-Apart-Were-younger-people-left-behind-by-the-EU-referendum.pdf>

<sup>6</sup> *Next Generation UK*, British Council, September 2017, page 5. <https://www.britishcouncil.org/research-policy-insight/research-reports/next-generation-uk>

<sup>7</sup> PSB Omnibus survey findings, Figure 4: Personal PSB value: differences between 16-24s and over-64s ranked on percentage point difference. [https://www.ofcom.org.uk/data/assets/pdf\\_file/0025/199105/psb-omnibus-survey-findings.pdf](https://www.ofcom.org.uk/data/assets/pdf_file/0025/199105/psb-omnibus-survey-findings.pdf)

services available to everyone (25%) and programmes which help us understand what is going on in the world today (23%).<sup>8</sup>

**Question 2: What do you think about the benefit to audiences who will watch the channel, as well as wider potential social and cultural impacts?**

23. As stated above, VLV considers that it will be more beneficial for audiences if BBC Three content is available on a TV channel, as well as its content being available to view on the iPlayer. This will mean that all the BBC's TV services will once again be universally available, which is an important principle of public service broadcasting.
24. Having a BBC Three TV channel will also make BBC Three content more easily accessible for those audiences who do not regularly use VOD services.
25. VLV welcomes the proposals in the consultation which specifically aim to broaden BBC Three's reach and appeal to a wider range of people, better reflecting the whole population of the UK. If the BBC is successful at better engaging younger adults who are currently light users of the BBC, this will be beneficial, providing greater value for them.
26. There is concern that the rise in dominance of the global SVODs is resulting in less distinctively British content<sup>9</sup>. In this context it is increasingly important that the BBC focuses on providing innovative and distinctive UK content for all age groups. As mentioned above, some of the most distinctive UK programmes in recent years have gone out under the BBC Three banner.

**Question 3: What impact (positive or negative) do you think our proposals for a BBC Three broadcast TV channel might have on fair and effective competition?**

27. VLV has no concerns with regard to the market impact of these proposals.
28. BBC Three provides a distinctively PSB service aimed at young adults in the UK. VLV does not believe that transferring the BBC Three online service to a TV Channel, as set out in the BBC proposals, will have an adverse impact on fair and effective competition.

**Question 4: Are there any steps you think we could take to minimise any potential negative effects on fair and effective competition or to promote potential positive impacts?**

29. No comment.

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<sup>8</sup> PSB Omnibus survey findings, . Figure 6: PSB societal value: differences between 16-24s and over-54s, ranked by percentage point difference. [https://www.ofcom.org.uk/data/assets/pdf\\_file/0025/199105/psb-omnibus-survey-findings.pdf](https://www.ofcom.org.uk/data/assets/pdf_file/0025/199105/psb-omnibus-survey-findings.pdf)

<sup>9</sup> *Outsourcing culture: When British shows aren't 'British'*, Enders Analysis, March 2021