

*Championing
excellence and diversity
in broadcasting*

Founded in 1983 by Jocelyn Hay CBE



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**COMMENTS FROM VOICE OF THE LISTENER & VIEWER TO
OFCOM ON PROPOSED CHANGES TO PUBLIC SERVICE MEDIA (PSM)
TRACKING RESEARCH FOR 2021**

27 January 2021

About 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).

Comments in response to the Notification of Changes to the PSB Tracker

2. VLV welcomes the opportunity to provide comments on proposed changes to the PSB Tracker survey, but we have concerns about the process.
3. Ofcom's letter to VLV of 23 June 2020¹ confirmed that there would be a consultation on these proposals before they were implemented. We are concerned that the present exercise falls short of a full consultation and that Ofcom may not be following its own Consultation Principles² before making a final decision about the proposed changes to the PSB Tracking survey. In accordance with its Consultation Principles, VLV expects Ofcom to publish all comments received in response to this consultation and, when issuing its statement setting out its final decision on any changes to the PSB Tracker, to explain the rationale for the final decision on the proposals in this consultation, referencing how it was influenced by feedback it receives from this consultation. VLV notes that no cover sheet is required for this consultation, which is the norm when Ofcom intends to publish respondees' submissions. We would welcome clarification on whether Ofcom intends to publish responses to this consultation and refer to them in its final statement.
4. VLV believes there is significant value in the longitudinal data of the PSB Tracker which can be linked back to ITC and IBA public opinion research. We are concerned that by making the proposed changes Ofcom will reduce the value of the longitudinal data collected since 2006. Therefore we would encourage Ofcom to do all it can to ensure that the value of the longitudinal data is maximized, while updating the tracker to allow for market changes and restrictions in methodology due to the Covid pandemic.
5. VLV is concerned that a number of the changes currently being proposed appear to relate to proposals in the PSB Review, namely those regarding provision of PSB-type content by non PSBs and the substitution of the phrase Public Service Broadcasting with 'Public Service Media'. VLV considers this premature since the PSB Review consultation is still open and Ofcom has as yet made no formal recommendations to Government regarding the definition of PSB or its reframing as PSM.

¹ Letter from Deborah McCrudden, Ofcom's Director of Market Research, which states: 'We will launch a consultation on our proposal for the new PSB tracker 2021 before its launch.'

² <https://www.ofcom.org.uk/consultations-and-statements/how-will-ofcom-consult>. 7. We think it is important that everyone who is interested in an issue can see other people's views, so we usually publish all the responses on our website as soon as we receive them. After the consultation we will make our decisions and publish a statement explaining what we are going to do, and why, showing how respondents' views helped to shape these decisions.

6. VLV considers that research to inform the PSB Review should be discrete and should be conducted separately from the PSB Tracker Survey to maintain the longitudinal value of the PSB Tracker research.
7. VLV is also concerned that there are significant implications in the substitution of 'Public Service Broadcasting' with 'Public Service Media'. It may be that the intention is for this to simply extend the scope of the research to include online provision by the existing PSBs, but there is no way to know whether a broader extension is envisaged because the proposals under consideration do not include a definition of PSM. It would be extremely useful for this point to be clarified as a matter of urgency.

Proposal 1: Extending the range of people surveyed to include low, lapsed and non PSB users

Given the changing nature of the UK audio-visual marketplace and the decline in viewing rates to broadcast TV, particularly among younger audiences, we are planning to identify and profile low, lapsed and non PSB users. This will enable us to monitor changes in the size and composition of these audience segments.

8. We would welcome clarification on this proposal. VLV questions it on that basis that people who are *low, lapsed and non PSB users* should already be identified and captured by the PSB Tracker Survey, since the survey sample should be representative of the UK population.
9. VLV would support *additional* research to monitor changes in the size and composition of these audience segments, separate from or additional to the existing PSB Tracker survey. We would also welcome further *additional* research to explore why these groups don't consume PSB.
10. While research into these groups' viewing habits will be useful to help us understand better the gaps in PSB provision, VLV urges Ofcom to be cautious when reporting this data. We advise against giving the views of these groups *undue* prominence because, while these data might be interesting, highlighting the views of non PSB users would skew perception of the overall results.

Proposal 2: Reviewing the consumption questions to ensure we have a more detailed understanding of the use of media services

We will also expand the consumption section of the survey to include usage of online services to ensure we have total market coverage. This will enable us to understand more fully what services low, lapsed and non PSB users are using and what PSB features these services are providing.

11. VLV agrees that expanding the consumption section of the survey to include usage of online services will provide better understanding of the total market, however this expansion should only analyse PSB content online and not content provided by the wider market since the PSB Tracker is supposed to track PSB provision, ie provision by the PSB's as defined in the Communications Act 2003.

12. Should Ofcom wish to understand better the contribution made by non PSB's to citizens in the UK, VLV suggests this research should be conducted separately from the PSB tracker and the data reported separately.
13. VLV questions why this proposal focuses, again, on the views of 'lapsed' PSB users in this analysis. We would appreciate clarification on this point.

Proposal 3: Extending the scope of the survey to include a new section on non PSB providers

Given the changing marketplace, we plan to extend the scope of the survey to include a new section on how well people consider other major content providers (e.g. Sky, Amazon Video, Netflix, YouTube) offer content with PSB-like attributes.

14. VLV would like to understand better Ofcom's objective in extending the scope of the survey to include non-PSB providers.
15. Since this is not clear in the consultation document, we are forced to make an assumption that this element of work relates to two proposals in the PSB Review, namely:
 - to replace the term PSB with PSM, with the aim to allow the inclusion of online content
 - to provide contestable funding for PSB content to a wider range of providers

16. As stated above, VLV does not oppose the inclusion of online content if it is provided by the PSB's, however we strongly oppose the inclusion of content from non PSB providers in the PSB Tracker Survey, which has until now tracked provision by the PSB's which are required by law to provide what is considered societally valuable content. The value of the PSB Tracker Survey is the evidence it supplies on the effectiveness of the PSB system, not on provision of PSB by the wider market.

17. These proposals to extend the survey to include non PSB providers is premature. They perhaps assume that Ofcom's proposals in the PSB Review will be passed into law. It is notable that the PSB Review consultation is still open and Ofcom has as yet made no formal recommendations to Government regarding the definition of PSB, or its reframing as PSM.

18. If Ofcom requires additional research to inform its conclusions during the PSB Review, as stated above, such research should be conducted separately and not rolled into the PSB Tracker research programme.

Proposal 4: Changing the way PSB is described to survey participants to improve comprehension

We revised the list of 'purposes' and 'characteristics' used in the previous tracking study to a combined list of PSB attributes in the recent PSB review qualitative and quantitative research. This list will be reviewed and further refined through piloting as part of the new survey set up.

19. VLV supports most of the proposed changes to the way PSB is described to survey participants by using a list of *attributes* to improve comprehension among respondents, however there are two PSB attributes for which we have comments; these are:

- *A wide range of programmes made in the UK and*
- *A wide range of high-quality programmes for children made in the UK*

20. VLV considers it is useful to differentiate between the economic and societal/cultural benefits of the PSB system. The PSB Tracker is primarily concerned with the societal and cultural benefits of PSB content, rather than the benefits to the wider UK economy.

21. In this context VLV questions whether it is relevant to audiences *where* a programme is made. Audience members may not even know the answer to this question, especially when locations are not clearly identified or there is no specific location (in animation, for example). Additionally, where a programme is made may not influence the nature of the output; some programmes made in the UK (*Sex Education* on Netflix, for example) do not reflect the UK, its culture or issues relevant to the UK audience. Therefore VLV would suggest that *whether programmes reflect UK culture* is a more relevant attribute to assess PSB value.

22. VLV would suggest better descriptions of these two attributes could be:

- A wide range of programmes which reflect UK culture and concerns
- A wide range of high-quality programmes for children which reflect UK culture and concerns

We also plan to add in a description of PSM is to help aid understanding and improve the quality of responses. The previous survey did not explicitly describe PSB but sought to evaluate its importance and delivery through rating the purposes and characteristics.

23. Regarding the proposed reframing of PSB to PSM, as stated above, VLV *strongly* opposes this proposal because we consider it premature for Ofcom to change the description of PSB to PSM before the PSB Review consultation has been concluded and the government and Parliament have had time to consider Ofcom's recommendations, which should be based on the outcome of the PSB Review consultation. Therefore, while VLV would not oppose a description of PSB being included to help aid understanding of survey participants we would oppose PSM being used as a term in the place of PSB.

Proposal 5: Changing the method used to measure the importance of PSB in order to better establish priorities

We plan to stop asking about importance of each PSB 'purpose' and 'characteristic' using a 1-10 rating scale and instead ask respondents which attributes (from the revised list) they value for themselves and which they value for society. In order to gain a better understanding of differentiation between attributes, we will ask agencies to recommend question techniques for creating prioritisation between attributes.

24. VLV supports the proposal to include questions which ask respondents which attributes they value for themselves and which they value for society, however we

question why there is a need to remove the 1-10 rating which we consider valuable in helping respondents express the strength of their appreciation.

Proposal 6: Changing the fieldwork methodology given the Covid-19 pandemic

Due to the ongoing situation surrounding the Covid-19 pandemic and current guidelines that are in place, Ofcom made the decision to suspend all face-to-face fieldwork across all consumer research projects in 2020 to protect the safety of everyone involved. This is likely to continue into 2021. Closer to the time of fieldwork, we will consider which methodology is best placed to ensure the welfare of all involved whilst continuing to ensure that we can capture the views of all audiences including those offline.

25. VLV considers these changes sensible, given the Covid-19 pandemic, as long as Ofcom ensures it also engages with those who do not use or have access to the internet, to ensure that the sample is representative of the UK population.

Proposal 7: Specific questions for removal

We are planning to stop asking some questions, as we do not believe they are useful in their current form. This includes PSB satisfaction compared to a year ago, devices used to watch different types of content and use of PSB websites, and opinions of bbc.co.uk and channel4.com.

26. VLV supports the proposal to stop including the specified questions in the survey.

Proposal 8: We may also change or remove some of the demographic questions.

27. VLV would be interested to know which demographic questions will be asked once Ofcom has made its final decision on this section of the survey.