



**A new BBC Three channel:  
Public Interest Test consultation**

**About us**

1. Directors UK is the professional association of UK screen directors. It is a membership organisation representing the creative, economic and contractual interests of over 7,500 members — the majority of working TV and film directors in the UK.
2. Directors UK collects and distributes royalty payments and provides a range of services to members including campaigning, commercial negotiations, legal advice, events, training and career development. Directors UK works closely with fellow organisations around the world to represent directors' rights and concerns, promotes excellence in the craft of direction and champions change to the current landscape to create an equal opportunity industry for all.
3. We welcome the opportunity to respond to the BBC Public Interest Test consultation: A new BBC Three Channel.
4. Directors UK has no objection in principle to BBC Three returning as broadcast television channel, provided that the additional value of the use of works on the channel is recognised and fairly rewarded and that our members, as underlying rights holders, are paid fairly for the use of their work.

**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?**

5. We recognise the public value and benefits of the proposal for a BBC Three broadcast TV channel as a way of ensuring that a wide range of diverse, entertaining and informative UK originated content aimed at younger audiences is accessible to all, particularly those who are currently underserved or unable to access BBC Three content via digital on-demand services.
6. We also support the intention to commission more work from under-represented and diverse groups; and for two-thirds of new spend to be outside London. This supports the BBC's aim to serve and reflect all audiences across the UK - provided it creates genuine opportunities for on and off-screen talent from outside London and supports new voices and storytelling, and does not just fall back on tried and tested voices or "lifting and shifting" talent from London.

**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?**

7. We recognise the potential audience benefits of putting BBC Three content on a free to air broadcast television channel as a way of ensuring access for those viewers who are unable to access the content via digital on-demand services. It is important that the BBC provides a platform and content that appeals to younger audiences offering information, education and

entertainment that reflects UK life. For it to be successful it will need to appeal to and reflect the audience it is seeking to attract.

8. As outlined in the plans it is important to ensure that if content aimed at 16-34 year olds is following CBBC channel content, that there is clear transition in terms age appropriate content post 7pm in the pre-watershed slots.

**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?**

9. As outlined above, Directors UK has no objection in principle to BBC Three returning as a linear channel, provided that the additional value of the use of works on the channel is recognised and fairly rewarded and that our members, as underlying rights holders, are paid fairly for the use of their work.
10. We welcome that the BBC has recognised in the consultation that its plans for the use of works on the channel are dependent on discussions with Pact and other rightsholders and we look forward to engaging with the BBC regarding this on behalf of our members.
11. We welcome the focus in the proposal on creating work outside of London and from under-represented groups, as this will benefit more diverse representation and investment in the nations and regions. However, this benefit will only be realised if there is genuine commitment in the commissioning and production process to achieving this, and that it is not simply lifting and shifting known talent and crews. It has got to create genuine opportunities for directors and other talent and crew from outside London and from under-represented groups.
12. We note that the channel will be running a large volume of repeats which will limit the amount of new originations that will be created: "In peak viewing time (7pm to midnight) we are proposing that 24% of hours will be first-run, with repeats accounting for 76%."
13. We also want to add to the discussion regarding budgetary pressures. We acknowledge the budgetary constraints within which the BBC operates, and recognise that it has said it will be doubling its content budget for BBC3 to £72.5million. However, we note that this is the same budget as the £75million budget BBC Three had when it was launched in 2003 – 18 years earlier, but that this is £50m less in real terms. We do have concerns that budgetary pressures on content production results in downward pressure on the programme making teams – often resulting in longer working hours and poorer working conditions. As money on screen becomes more stretched, production budgets and delivery schedules are becomingly increasingly squeezed, and programme makers are often being asked to do more for less. This is having a considerable negative and unsustainable impact on the health, well-being and stamina of the production workforce. In order to retain and develop a talented and diverse production workforce, able to create quality PSB content for BBC Three, content production needs to have appropriate budgetary resourcing.

**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?**

14. To mitigate any negative impacts from the additional use of creative works the BBC must engage in fair discussion over rights payments. This is particularly important with the increase in iPlayer

first commissioning and changes to use and extended use, which has an impact on rights and royalties - a critical part of a freelance creators' income.

15. As noted above, to deliver on the intention to increase the number of productions created out of London and to address under-representation, it is vital that meaningful opportunities for new talent and ideas are created and followed through. This must have commitment across the content production chain from commissioners to producers, to crew. Having clear targets and accountable measures for delivery will be key to achieving this.
16. To address the concerns over budgets and the impact on productions and workforce welfare, commissioned productions must be given appropriate budgets and schedules.
17. In order for the BBC to achieve its aims to reach its target audience it must be accessible and discoverable, and we therefore agree that it should therefore appear high up in Electronic Programme Guide to ensure it is easily discoverable.

**Directors UK**  
[www.directors.uk.com](http://www.directors.uk.com)  
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