

13 October 2014

Mr Graeme Mason
CEO
Screen Australia
Level 7, 45 Jones Street
Ultimo NSW 2007

Dear Graeme,

Screen Australia - Round 2: Draft Guidelines for Comment: Documentary Programs

SBS welcomes this opportunity to comment on Screen Australia's second round of draft guidelines on documentary programs and we appreciate the stakeholder consultation undertaken by Screen Australia to date, as part of its review of its documentary funding policies and procedures.

This second round draft demonstrates that Screen Australia has actively listened to stakeholders' concerns and has delivered on its goal to support Australian documentary investment into the future.

In this second round draft, Screen Australia has struck a much better balance between recognising the critical role of public broadcasters, and creating more diverse opportunities in the rapidly changing converged media environment. As SBS continues to play a vital role in documentary production in Australia – now and into the future - it is commendable that Screen Australia has proposed a broadcast program fund which maintains the successful feature of notional allocations.

This broadcast program fund enables ongoing collaboration between Screen Australia and Australian broadcasters, in contributing to Australia's future wealth of documentary content. SBS also acknowledges the role of Screen Australia in assessing applications for notional funding against the proposed assessment criteria outlined in the second round draft. SBS agrees with Screen Australia's proposition that additional funding criteria must be relevant to the broader funding objectives and supports the intention of the criteria identified by 'quality', 'cultural value' and 'innovation'.

To ensure Screen Australia's criteria does achieve good investment from allocated funds without contradicting the investment parameters imposed on SBS by its Act and Charter, SBS asks that Screen Australia further considers our following comments on some of the elements contained therein.

'Quality'

SBS supports the requirement for quality of premium Australian content that resonates with contemporary audiences.

However, the criterion's emphasis on the global marketplace, which implies the external international audience outside Australia, should not be the measure of 'quality'. Factual programming about Australian life, its people and its stories, by its nature does not necessarily resonate with global audiences. The emphasis should be on the contemporary Australian audience of documentary content that creates Australia's enduring cultural wealth.

As a multicultural and multilingual public broadcaster, 'global appeal' is not a variable in SBS's commissioning processes for providing (multi)culturally relevant content for an Australian audience. SBS does not have global remit in terms of our allocations. This is not a limitation, but rather promotes the intended purpose of documentary programming to transform factual information about Australia into something enduring and of cultural value.

'Cultural value'

SBS adheres to the principle of cultural value in its commissioning decisions on documentary content and agrees that this should underpin investment decisions in documentary content.

The notion of documentary content as something of cultural value does contemplate an impact on audiences beyond transmission. Whether documentary content has an impact beyond transmission is an important consideration in SBS's commissioning processes and is also implied by our Charter which contributes to ideas of identity and belonging, increases awareness of diversity of cultures, and promotes understanding of difference.

However, the inclusion of 'an enduring legacy ... now and into the future' in this assessment criterion is problematic if it influences Screen Australia's decisions on whether to limit or withhold funding from the notional allocations to broadcasters.

SBS has demonstrated its contribution to documentary of enduring legacy through its Content Outreach activities on distinctive commissions such as *Go Back to Where You Came From*. However, this cannot be done for all content. 'Enduring legacy' is a vague and undefined measure of future impact - no one can predict which content will have 'legacy'.

Further, 'endurance' well beyond transmission is not necessarily indicative of the cultural value of content. Cultural value can be measured by the immediate impact of entertaining and informing Australian audiences. Under its Charter, SBS is a public broadcaster that educates, informs and entertains, and each of these pursuits contributes to diversity awareness in Australia. These are all legitimate ways of creating content of cultural value and not all content can be made for the purpose of contemplating its enduring value.

Diversity

SBS acknowledges the importance of having a wide breadth of documentary programming and that wide breadth is an essential consideration for Screen Australia's decisions on funding allocations. However, the scope of the slate contemplated by Screen Australia's assessment criteria is too broad.

While we can appreciate that Screen Australia wants diversity across its content slate, given the 40 per cent allocation to SBS, we believe Screen Australia should consider the likely content offerings from SBS when assessing proposals from other applicants. It would be regrettable for SBS to lose certainty on the notional allocation based on other proposals being accepted that are similar to the kind of content that can be put forward by SBS, given our specific Charter requirements.

Alternatively, Screen Australia's assessment of SBS proposals should be made in consideration of only SBS allocations, looking at the particular kind of slate SBS has on offer and our commissioning values.

Thank you for taking the time to consider these comments. SBS hopes that these insights will assist in contributing to the final draft documentary guidelines and to ensure the continuation of valuable documentary content in Australia. We look forward to continuing our collaboration with Screen Australia in bringing unique content to Australian television screens.

Yours sincerely,



Helen Kellie
Chief Content Officer