

Ofcom

Small Screen Big Debate: The Future of Public Service Media

MG ALBA response

16 March 2021

MG ALBA

MG ALBA is short for Meadhanan Gàidhlig Alba (Gaelic Media Scotland) and is the operating name of Seirbheis nam Meadhanan Gàidhlig or the Gaelic Media Service.

MG ALBA's statutory purpose is set out in section 208, Communications Act 2003:

"to secure that a wide and diverse range of high-quality programmes in Gaelic are broadcast or otherwise transmitted so as to be available to persons in Scotland"

"...and a reference to being available to persons in Scotland includes a reference to being available both to persons in Scotland and to others"

Governance oversight of MG ALBA is exercised by Ofcom, who appoint members of the board of MG ALBA subject to the approval of Scottish Ministers.

MG ALBA is funded by the Scottish Government.

BBC ALBA

MG ALBA funds and operates BBC ALBA (the Gaelic language television channel) in partnership with the BBC. BBC ALBA is the first partnership television service to operate under a BBC licence.

BBC ALBA fulfils the UK's obligations for Gaelic television **under Article 11 of the European Charter for Regional or Minority Languages** and is an important part of the Scottish broadcast ecology, commissioning a large proportion of all independently produced TV content in Scotland.

Question 1: Do you agree that a new regulatory framework for Public Service Media (PSM) delivery should support a more flexible 'service neutral' delivery approach that is more outcomes focused?

Yes, MG ALBA welcomes a more service neutral approach, subject to the proviso that there is no diminution of the public service outcomes sought for the UK's indigenous languages including Scottish Gaelic, along with the associated cultural and economic benefits that arise from PSM in these languages. The linguistic outcomes are valuable, but so too is the portrayal of the cultural diversity associated with these languages, to all of the UK. The economic impact of the current model is valuable too because it stimulates the independent production sector across the UK, including in areas with fragile economies, such as the Highlands and Islands of Scotland.

While supportive of the 'service neutral' delivery approach, we also recognise the particular value afforded to a minority language through a linear broadcast channel. A service neutral approach must guard against fragmenting the impact currently created for UK indigenous

languages by dedicated linear broadcast channels. We would therefore support an approach that protected that status while enabling PSM content to be delivered across services.

Question 2: Do you agree with our proposals for a clear accountability framework?

Yes. Care must be taken to ensure the metrics are meaningful for the purposes of the UK indigenous languages – e.g. hours of first run origination are no less valuable in an indigenous language service than they are in a majority language service. Also, in relation to cultural diversity, metrics should reflect the desirability of the reflection of all the UK back to itself (i.e. not just reflected back to that particular nation or region). Metrics around the creative industries should reflect the granularity of outcomes sought, such as meaningful geographic spread of independent production supply.

Question 3: What do you think should be included in the PSM 'offer'?

MG ALBA recognises the very high risk posed to PSM through the power of the global technology companies and online platforms. If PSM is at risk, so too is the place of vulnerable minority languages such as Scottish Gaelic, and with it the cultural diversity they contribute to the UK, and the geographically diverse economic outcomes created through their supply sectors. MG ALBA fully supports the position set out by the PSBs in their [Joint PSB Submission on prominence, inclusion and fair value](#). We note in particular that the full BBC iPlayer service would be required to be offered and accepted under the offer mechanic. Where broadband providers are supplying a bundled media service it may be useful to require PSM availability and prominence as part of that provision.

Question 4: What options do you think we should consider on the terms of PSM availability?

MG ALBA agrees with the position set out by the PSBs in the paper above. We agree that fair terms include access to data and would share the concern about the risk of PSB disintermediation by platform. We suggest this should be addressed directly.

Question 5: What are the options for future funding of PSM and are there lessons we can learn from other countries' approaches?

MG ALBA is clear that it does not support subscription as an option for PSB delivery. Subscription will not enable the PSBs to deliver content that provides social benefit as opposed to commercial return. Funding through taxation can be future proof and progressive as long as independence is maintained and governance is robust.

Question 6: What do you think about the opportunities for collaboration we have referred to? Are there other opportunities or barriers we haven't identified?

MG ALBA agrees that more collaboration between PSBs could create the scale required for PSM survival, but notes that distinctive offerings of each service must be maintained. At practical level, back-to-back different language models for content production can and

should be explored across PSBs, especially cross territory and especially in high tariff genres such as drama.

Question 7: What are your views on the opportunities for new providers of PSM?

MG ALBA recognises the urgent need to serve young audiences better but we would highlight that the resources required to enable that should be directed to existing PSM providers, particularly those recognised as under-funded such as MG ALBA/BBC ALBA, rather than risk fragmenting the current system further. Useful mechanics could be created to enable targeted investment in UK indigenous language PSM such as an indigenous languages production tax relief, and contestable funds, such as that offered by the [Broadcasting Authority of Ireland](#). The BAI's remit specifically includes "funding in support of high quality programmes on Irish culture, heritage and experience". Most recently in the UK, the required allocation of funding to [UK indigenous languages](#) through the British Film Institute's Young Audiences Content Fund is proving to be transformative for Scottish Gaelic programming for children.