While it will be useful for Ofcom to undertake a review of BBC News and Current Affairs, it is a failure on the part of Ofcom to focus only on the BBC in this instance.

In 2011 I raised with Ofcom the need for channels 3, 4 and 5 to take account of the BBC “King” report which had examined the Corporation’s performance in the context of reporting the Nations. Although there were a number of useful findings in the report which helped to improve quality, the response from Ofcom on 10 Nov 2011 was

“We do not consider it to be our role to make licensees aware of the recommendations of a report like King because by doing so we would in effect be making those recommendations an adjunct to our own rules. Whilst we do refer to pieces of Ofcom research in our code guidance, we do not refer to any third party research.”

I again raised the issue in July 2017 – see section 7 of my submission to the consultation on the BBC Scotland channel.

It is simply an untenable position to evaluate BBC news and current affairs without attention to, and analysis of, the performance of the other PSB channels.

In the context of Scotland, which is my particular interest and concern, there has been substantial textual analysis of BBC reporting in the context of the issue of independence while ITV, channels 4 and 5 have remained largely free of such scrutiny despite their having reported the same news and broadcast similar programmes in current affairs- albeit fewer.

It defies belief to think that the shortcomings identified in the ‘King” report were and are not present in ITV etc and not only should Ofcom be alive to this issue but should be taking steps to ‘make communications work for everyone’ and ‘maintain high quality broadcast content for audiences’

News and current affairs which makes the kinds of errors identified in the ‘King ‘ report cannot be high quality and my view is that Ofcom has a statutory duty to secure the citizen interest by ensuring that these
errors are identified and addressed.

What is disturbing is that it does not seem as though Ofcom has a robust evidence to judge whether its licensees (apart from the BBC) are reporting the nations and regions to an acceptable standard.

The time has come to apply to the other psbs an equivalent analysis and evaluation of provision of reporting in news and current affairs.

While it may be argued that the BBC is held to and does achieve higher standards than its competitors, I cannot see channels 3, 4 and 5 accepting such an assertion and my belief is that they would welcome the opportunity to assess and improve their reporting.

It is not as though Ofcom has not had this issue drawn to its attention and indeed Ofcom has had many years to act but has chosen not to do so.

Please consider amending your work plan to take account of this submission.

I await a specific written response.

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