

**Title:**

**Forename:**

**Surname:**

**Representing:**

Organisation

**Organisation (if applicable):**

Scottish Greens

**Email:**

**What additional details do you want to keep confidential?:**

No

**If you want part of your response kept confidential, which parts?:**

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Additional comments:**

The Scottish Greens welcome the opportunity to comment on the proposed guidance. We believe it is unreasonable to exclude us from the list of Scottish major parties while including the Liberal Democrats. YouGov's full Scottish poll from October had Greens and Libdems both on 4 per cent, figures replicate by Ipsos Mori in January. UK-wide polling now regularly shows us either equal or with Green support ahead. As an example, a constituency poll of Glasgow North in February showed Green support at 10%, up over 6 points and Liberal Democrat support at 4%, down 27 points. It is clear in terms of current electoral support that the Liberal Democrats do not have an advantage over the Scottish Greens. In terms of elected representation the Scottish Greens have 2 MSPs with a further 2 MSPs joining the party during 2014. Consistent polling for the last year has predicted 8-11 Green MSPs at the next election, around double what the Liberal Democrats are predicted to take. In the 2014 European election we secured 8.1 per cent of the vote, ahead of the Libdems' 7.1, securing higher votes in 21 of Scotland's 32 local authority areas. It would clearly be unreasonable to relegate us to a lower status than a party we came ahead of in the most recent national election.

Since September our membership has surged to 8,500 - close to the Scottish Conservatives' published membership of 11,000 and that of Scottish Labour (understood to be between 8,000 and 13,500) and far outstripping the Scottish Libdems whose most recent published figures suggest a membership of 2,831.

During the referendum campaign we played a prominent role, appearing regularly in televised debates and discussions including both the BBC and STV's final panel debates, neither of which included a Libdem.

In the context of a post-referendum election, with a politically-engaged electorate and a decline in support for two or three parties, it is clear that a broadcaster not reflecting a broader range of voices will not meet the expectations of its audience.

**Question 1: Please provide your views on:**

- a) the evidence of current support laid out in Annex 2, and**
- b) whether there is any other relevant evidence which you consider Ofcom should take into account for the purposes of the 2015 review of the list of major parties:**

**Question 2: Do you agree with our assessment in relation to each of:**

- a) The existing major parties,**
- b) Traditional Unionist Voice in Northern Ireland,**
- c) The Green Party (including the Scottish Green Party), and**
- d) UKIP?**

**Please provide reasons for your views.:**

**Question 3: Do you agree with the proposed amendment to Rule 9 of the PPRB Rules Procedures outlined in paragraph 3.7 above? Please provide reasons for your views.:**