

Consultation response

The Scottish Government:

Introduction

The Scottish Government welcomes the opportunity to respond to Ofcom's consultation on prominence and accessibility on Connected TV Platforms. The Scottish Government supports mechanisms that enable greater prominence of important PSB content and offer equitable outcomes for all audiences across the UK. It is for that reason that we are responding to this consultation to set out our concern that the current Code as drafted may unfairly impact services provided in Scotland, particularly Channel 3 services provided by STV.

We believe that certain aspects of the proposals present risks to the visibility and discoverability of Scotland-specific public service content. These concerns centre primarily on how regional variation is treated in the user interfaces (UIs) and search environments of designated connected TV platforms.

Channel 3 services for the majority of audiences in Scotland are provided by STV and these audiences should not be disadvantaged; Scotland must benefit from the same quality of service, user experience and access as those across the rest of the UK.

Regional Variation

The Scottish Government welcomes the intention, but is concerned about:

- **Inconsistent location-based logic:** We note that Ofcom proposes that providers are not required or incentivised to regionalise their regulated television selection services (RTSS), which means that STV and STV Player will be less prominent than ITV and ITVX in the STV regions. The Scottish Government agrees with Ofcom on the benefits of regionalisation to ensure better user experience with better personalisation of user interfaces, and the ability to make immediately visible content that is most relevant to the user's location. However, the approach proposed will enable providers to disregard regionalisation if they choose to, which will disadvantage viewers in Scotland, impacting user experience and access to content.



- **Risk of conflation with ITV/ITVX:** Insufficiently granular regional user interface variation could lead to confusion and inadvertently reduce engagement with STV/ STV Player.

Ofcom’s proposals state that PSB “listed channels” – including STV – should appear within the first seven slots in Live TV areas or guides. Our concern is that some platforms may implement a UK-wide ordering for simplicity, potentially not providing STV the prominence it should have as a Channel 3 service for most of Scotland. Variants of user interfaces across multiple devices may not uniformly apply regional ordering unless Ofcom provides stricter enforcement expectations.

Given Ofcom’s own acknowledgement of platform diversity, the Scottish Government believes regional accuracy must be explicitly reinforced.

Search and Content Attribution in Scotland

Ofcom proposes that PSB content should be the most prominent search result when it is the most relevant, and clearly attributed to the correct PSB.

The Scottish Government supports this, but notes that search algorithms may not always apply Scottish regional logic reliably, risking inappropriate prioritisation of ITV content instead of STV’s. This could result in STV’s regional news and current affairs output being overshadowed if platform search systems classify results using UK-wide relevance metrics.

Given the role of regional distinction across the UK, in particular for news and cultural programming, it is essential that search prominence reflects regional PSB responsibilities.

Uniform UI Design Across the UK

Ofcom notes that the Code is not mandatory but that platforms following recommended actions will be treated as compliant.

Our key concern is that this may encourage platforms to adopt uniform UK-wide UI templates without adequate Scottish variation. This could result in deprioritising region-specific development work due to cost or complexity and unintentionally diminish the visibility of Scotland-exclusive PSB services.

Conclusion

The Scottish Government strongly supports Ofcom’s goal of ensuring PSB prominence and accessibility. However, regional variation is not a peripheral detail – it is fundamental to the UK’s PSB system and essential to ensure Scottish audiences are served effectively.



To protect the integrity of Scotland’s PSB provision, the Scottish Government urges strengthened regional prominence requirements to ensure accuracy and equitability of service provision. As Ofcom states, the core objective of this regime is to maximise audience benefits by ensuring public service content is available to the overwhelming majority of the population.¹ We are concerned that the draft Code will limit the benefits to Scottish audiences and therefore limit the ability to meet this clear and critical objective. There should be stronger protections in place to ensure the aims of this objective are met for audiences across the whole of the UK, and to avoid compliance solely through generic UK-wide implementation.

Without strengthened regional obligations, there is a material risk that Scottish broadcasting content could be unintentionally deprioritised within connected TV environments, weakening audience access to Scottish news, culture, and wider public service content.

¹ Ofcom, 2025: [Statement: Designation of Television Selection Services](#)