

Your response

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<p>Question 1: Do you have any comments on Ofcom's proposed Work Plan for 2026/27?</p>	<p>Confidential? – No</p> <p>Summary of Response</p> <p>The Scottish Government welcomes the opportunity to comment on Ofcom’s proposed Plan of Work for 2026/27. The following comments focus on Ofcom’s priority area “Media we trust and value”, as well as the broader implications for broadcasting, public service media, and Scotland’s creative industries.</p> <p>Support for Public Service Media</p> <p>The Scottish Government strongly supports public service broadcasting and values the essential role that broadcasters play in Scotland’s democratic life, cultural representation and creative economy. We recognise and support Ofcom’s continued recognition that audiences must be able to access a wide range of content, including public service media (PSM) content that is produced across the UK and reflects its diversity. We also support Ofcom’s priority to ensure that audiences can find and access a plurality of news that is duly accurate, duly impartial and trusted.</p> <p>However, as highlighted in our recent response to Ofcom’s consultation on STV’s proposed changes to regional news commitments, we remain concerned that Scotland’s media ecology is becoming increasingly fragile. Proposals that weaken regional news provision, reduce plurality, or dilute regional and sub-regional representation pose a significant and accumulating risk to trusted media in Scotland.</p>

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	<p>The Scottish Government remains concerned about the performance of UK network public service news services, which continue to fall short in adequately and accurately reflecting the devolved landscape of the UK. While there have been improvements over time in some aspects, these gains have not been sufficient to address the structural and recurring shortcomings that persist in UK network coverage.</p> <p>More than twenty-five years on from the establishment of devolution, and seventeen years after the King Report on BBC network news coverage, persistent systemic shortcomings remain. These include misleading use of terms such as “the NHS” or “the Government” when the institutions being referred to apply only to England or to reserved UK-wide matters, as well as a consistent tendency to frame devolved Scottish policy developments primarily through their perceived implications for the UK Government, rather than treating them as matters in their own right.</p> <p>It is essential that UK network public service news providers meet their core obligations to provide trusted and accurate news, and to reflect the diversity of the UK’s nations and regions. These duties must be interpreted meaningfully, with proper understanding of devolved responsibilities, ensuring that coverage accurately reflects each part of the UK.</p> <p>In this context, Ofcom’s Plan of Work for 2026/27 must reinforce its responsibilities to safeguard the availability, prominence, and sustainability of trusted public service content that audiences in Scotland continue to rely upon – particularly content that ensures strong and meaningful local representation and reflects Scotland accurately and consistently.</p> <p>Media Literacy</p>

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	<p>The Scottish Government has a strong interest in Ofcom’s work on media literacy, recognising its importance to supporting informed debate, countering misinformation, and strengthening democratic participation.</p> <p>We support Ofcom’s ongoing annual reporting on media literacy, as well as the forthcoming mid-term evaluation of the <i>Making Sense of Media</i> (MSOM) three-year strategy. This evaluation will be central to shaping the next phase of Ofcom’s media literacy programme, and we look forward to engaging with this work and understanding how the findings will inform future priorities and delivery.</p> <p>Implementation of the Media Act 2024</p> <p>The Scottish Government continues to take a close interest in Ofcom’s work relating to implementation of the Media Act 2024. We welcome Ofcom’s thorough approach to these responsibilities, including in relation to updated public service broadcasting regulatory requirements and the discoverability of PSB content on digital and connected platforms.</p> <p>We note the significant programme of work on video on-demand regulation and the forthcoming consultations on a new on-demand standards code and a new accessibility code. The Scottish Government will continue to engage closely to ensure the distinct needs of Scottish audiences and the interests of Scotland’s creative economy are reflected throughout these processes.</p> <p>BBC Charter</p> <p>As Ofcom is aware, the Scottish Government has a strong and ongoing interest in the BBC’s role in supporting the creative economy across the UK. We will continue to press for the BBC to strengthen its impact for audiences in Scotland through distinctive, high-quality</p>

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	<p>content that reflects, represents, and serves the Scottish people, while supporting a sustainable and thriving creative sector.</p> <p>We therefore welcome Ofcom’s commitment in the Plan of Work to monitoring developments in the BBC Charter process and the implications for BBC Scotland and MG ALBA.</p> <p>Plurality and Regional Representation</p> <p>In our response to Ofcom’s consultation on STV’s proposed changes to regional programming commitments, we set out significant concerns about the long-term risks associated with centralisation, reduced regional specificity, and weakened local news provision. We reiterate these concerns here because they are directly relevant to Ofcom’s priority of ensuring “media we can trust”.</p> <p>Key considerations highlighted in that response include:</p> <ul style="list-style-type: none"> • Plurality and local representation are fundamental to trusted media. Any weakening of regional obligations undermines Ofcom’s own stated policy objectives around representation, democratic accountability and trusted news. • Regional and sub-regional news is essential to democracy. It enables scrutiny of local institutions, supports informed civic participation, and reflects the distinct issues, voices and identities of communities across Scotland. • Scotland faces a cumulative decline in public interest journalism, with structural pressures across BBC Scotland, commercial broadcasters, local newspapers and digital outlets. Ofcom’s regulatory decisions must therefore mitigate, not intensify, this risk. • There is no persuasive evidence that consolidation models centred in Glasgow or elsewhere

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	<p data-bbox="794 271 1394 342">maintain audience trust, engagement or editorial diversity equivalent to locally rooted production.</p> <ul data-bbox="746 367 1369 439" style="list-style-type: none"> • Digital expansion is welcome but cannot substitute for universally accessible broadcast news. <p data-bbox="699 517 1353 703">These points are highly pertinent to Ofcom’s broader work on trusted media in 2026/27. We urge Ofcom to ensure that its regulatory approach is aligned with the need to preserve plurality and local relevance across news services in Scotland.</p> <p data-bbox="699 837 1369 909">Authentic Representation and Scotland-Based Production</p> <p data-bbox="699 987 1369 1330">The Scottish Government recognises Ofcom’s intention to ensure audiences can watch and listen to public service content produced across the UK that reflects its diversity. We continue to emphasise the need for Scotland’s creative sector to be properly represented and supported, including through commissioning that delivers meaningfully Scottish content and sustains careers for Scotland-based screen and broadcasting professionals.</p> <p data-bbox="699 1413 1369 1599">We believe it would be beneficial to include stronger commitments at a nation level in the Plan of Work to Ofcom’s role in supporting regional representation and portrayal, and delivering positive outcomes for audiences in Scotland.</p> <p data-bbox="699 1682 943 1711">Gaelic Broadcasting</p> <p data-bbox="699 1794 1385 2018">As in previous years, we have emphasised the importance of ensuring fair recognition of minority language broadcasting across the UK. We note that the proposed Plan of Work contains no specific reference to Gaelic broadcasting, other than a brief mention of MG ALBA in the context of BBC Charter developments. It is</p>

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	<p>disappointing that wider recognition of minority language broadcasting in Scotland is omitted.</p> <p>As we have stated previously, we would welcome a fuller and more balanced recognition of the specific needs and challenges facing Gaelic broadcasting, particularly in comparison with the treatment afforded to Welsh language provision. This could be achieved by Ofcom's inclusion of clear and substantial commitments to Gaelic broadcasting matching the commitments to Welsh language broadcasting.</p> <p>Protecting Trusted Media in a Changing Environment</p> <p>The Scottish Government recognises the challenges Ofcom identifies for 2026/27, including changing technology, markets and audience behaviour. We believe it is important that Ofcom's work has a strong focus on protecting access to high-quality broadcast content, including news; ensuring content remains discoverable on digital platforms; monitoring risks from misinformation, algorithmic distribution and AI-generated content; and maintaining plurality across the broadcast ecosystem.</p> <p>Conclusion</p> <p>The Scottish Government supports Ofcom's strategic aim of delivering media that audiences can trust and value. Achieving this requires strong regulatory action to preserve plurality and local representation, and to support Scotland's creative and linguistic diversity.</p> <p>We look forward to continued constructive engagement with Ofcom as it progresses its work throughout 2026/27.</p>

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