



Glenn Preston  
Director – Scotland  
Ofcom

8<sup>th</sup> February 2024

Dear Glenn

## **CONSULTATION – OFCOM’S PROPOSED PLAN OF WORK 2024/25**

Thank you for your correspondence of 20 December 2023 inviting me to respond to the Ofcom consultation on the proposed Plan of Work for 2024/25. I welcome the opportunity to comment and this response covers my own portfolio interests, across broadcasting and the wider creative industries. I am happy for Ofcom to publish any reference to the content of my response. I am aware that a separate response will come from the Minister for Small Business, Innovation, Tourism and Trade, Richard Lochhead MSP on his portfolio interests.

As you are aware, the Scottish Government strongly supports broadcasting and the important role that the distinct and essential services provided by broadcasters have in Scotland, in relation to our audiences and the creative sector. I value Ofcom’s initiatives to improve and support public service media and ensure that everyone in the UK feels represented in the programmes they watch and listen to.

### **Representation**

Ofcom states that it seeks to achieve the outcome that ‘audiences can watch and listen to public service content which is produced across the UK and reflects its diversity’. The Scottish Government strongly believes that broadcasting media should deliver for each part of the UK, with an appropriately reflective and authentic representation for Scottish audiences. As I have set out in past years, this is partly built upon the diversity of the creative sector. As such, the Scottish Government is keen to ensure that plans for improving diversity of the creative sector in Scotland are clearly set out.

I welcome the recognition in the proposed Plan of Works that some of Ofcom’s workstreams have particular relevance in the nations and I trust that this will be reflected appropriately through Ofcom’s engagement across the UK. I also welcome the growing presence in Scotland through your new office in Edinburgh’s Quatermile, and Ofcom’s commitment to collaboration with stakeholders in Scotland, which is vital. The Scottish Ministers and

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Scottish Government officials are grateful for Ofcom's engagement, and we look forward to this continuing constructively in the next year.

## **Media Bill reforms**

The Scottish Government continues to take a close interest in the Bill to ensure that it provides for a strong and sustainable future for our public service broadcasters and the wider creative sector, including independent production, which is a vital part of the creative economy in Scotland and across the UK. We have also made it clear that it is vitally important that there is no loss of the type of content that public service broadcasting has a unique role in protecting, and the Scottish Government will continue to express its strong view that this type of content should be safeguarded. The Bill is critically important for the future of the Gaelic language and for broadcasting, so parity is important and we have made this clear in our engagement with the UK Government.

One particular area that the Scottish Government is concerned with is the potential impact that the removal of the publisher-broadcaster restriction will have on independent production in Scotland. This will depend on how Channel 4 decides to make use of its new freedoms and we note that the UK Government's view is that the most appropriate way forward is to keep Channel 4's support for regional production under review, which is best done under Ofcom's existing powers. We agree that it will be vital to keep this matter under review, and to ensure that steps are taken at the appropriate time to mitigate adverse effects on the sector.

We recognise that supporting the Media Bill reforms will be a key part of Ofcom's work and the Scottish Government supports Ofcom's plans to publish a roadmap to outline how and when it would implement changes. The Scottish Government will continue to engage on this important Bill and with Ofcom on its plans as these develop.

## **The BBC**

As you are aware, the Scottish Government has a strong interest in the role of the BBC in supporting the creative economy across the whole of the UK. The Scottish Government will continue to press for the BBC to do more so that it can make a positive impact for audiences through distinctive content which reflects, represents and serves the Scottish people, and supports our thriving creative economy.

The Scottish Government strongly believes that broadcasters need to be genuinely representing the whole of the UK, and a robust, publicly funded BBC is a vital part of the ecosystem which maintains investment in Scottish-produced content, develops Scottish talent and companies, and supports our creative industries more widely. We welcome the continued commitment in the proposed Plan of Work to holding the BBC to account for how it delivers its Mission and Public Purposes across its public services across the nations, particularly when some viewers and listeners in Scotland continue to feel less positive about representation and authenticity of BBC programmes, compared to other UK audiences. I will continue to urge Ofcom to ensure that audiences in Scotland receive a more representative service that supports the creative economy in Scotland and contributes to its development.

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## **Channel 3, 4 and 5 relicensing**

The Scottish Government supports Ofcom's work to progress the relicensing of the Channel 3, Channel 4 and Channel 5 services, which are so valuable to the creative industries and audiences in Scotland.

Our independent production sector is extremely important to Scotland's economy and cultural landscape, and we will continue to set out the importance of Ofcom's engagement with a range of organisations in Scotland to ensure the distinct views and expertise from a Scottish perspective are reflected, including around quotas for independent production in the nations.

## **Diversity**

As well as Ofcom's Annual Report on the BBC, I welcome Ofcom's continued delivery of reports on media use, including use and attitudes of adults and children. The Scottish Government supports Ofcom's priority to increase on- and off-screen diversity in television and radio and we fully support the work to facilitate conversations across the UK's broadcasting industry, fostering collaboration to improve and promote equity, diversity and inclusion. The Scottish Government will continue to engage and closely monitor the data Ofcom collects and reports on, and we hope that this will support progress in a positive direction.

## **Protecting and promoting choice**

As the proposed Plan of Works sets out, while on-demand services continue to grow in use, live broadcast TV and radio services are still widely used and valued. This is particularly important in Scotland – as you will be aware, Scotland continues to watch the most broadcast TV of any UK nation. I am pleased that the importance of broadcast services is highlighted and that the proposed Plan of Work includes a range of work to continue to protect and promote a choice of high-quality programmes for all audiences across the UK, over both broadcast and on-demand services.

## **Broadcasting and Scotland's languages**

As I have emphasised in previous years, the Scottish Government appreciates specific reference to Gaelic language and the important role of MG ALBA in the Plan of Work. However, as we have previously stated, we would welcome a much broader reference to help address the imbalance that is evident in the consideration given to Gaelic compared to Welsh. In particular, it would be helpful to recognise the needs and challenges facing MG ALBA.

The inclusion of a reference to support the UK's indigenous languages and the role of MG ALBA is an important and continuing part of supporting our diverse, pluralistic broadcasting landscape in Scotland.

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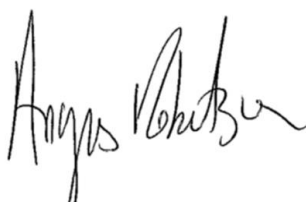


## Radio

I welcome the work to deliver improvements across radio and the Scottish Government will be closely following the proposed work around commercial radio local content and the plans coming through from the Media Bill. As with any change, it is important that this does not negatively impact the diversity of radio across the nations and the specific needs for both urban and rural areas across the country, which are key to ensuring audiences in Scotland are kept entertained, and informed about the issues that matter to them.

Thank you once again for the invitation to engage with this consultation. If further engagement would be helpful, please don't hesitate to reach out to my officials.

Yours sincerely



**ANGUS ROBERTSON**

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