

Question 1: Do you have any comments on our proposals?

Quality & Budget

In response to Ofcom's provisional determination on the proposed BBC Scotland Channel, Directors UK agrees with the finding in section 1.2 that:

"the personal value audiences derive from it will depend on the BBC's ability to deliver a mix of high quality content."

And 4.27: *"The level of personal value experienced by viewers in Scotland will depend on how attractive audiences in Scotland find this content as well as the BBC's ability to deliver creative and distinctive output for the new channel"*

As outlined in our submission to Ofcom's original review, we highlighted our members concerns that the proposed programme budgets were too low to deliver the ambition for 'high quality drama, factual and arts programmes' set out for the Channel. As our submission stated: *"for the channel and its content and services to have any meaningful success it will require an appropriate budget with which to deliver a service which Scottish viewers will engage with."*

We remain concerned that the proposed budget falls far short of this and agree with the finding of an Evidence Gap in the Review of Public Value (A1.69) that there is *"Limited detail on the extent to which the amended proposal is sufficient to address budget concerns."*

We would like to see this being examined in more detail, e.g. through a full BCA of costs of the proposal.

BBC2 Scottish programming

We also agree with the recommendation in section 1.2 that the BBC should examine more explicitly any negative effects on public value of ending Scotland-only programming on BBC Two.

Impact on the Scottish Production Sector

In relation to the impact on the Scottish production sector our members are concerned that there will be an impact and the recent

announcement that STV jobs are being cut and STV2 is being closed has caused some concern among our members, and is viewed as a big hit to the Scottish TV industry. Whilst recognising that these are commercial restructuring decisions taken by STV, there is concern being aired that the new BBC Scotland channel is already having an economic impact.

Scottish Production Talent

In relation to the assessment of market impacts on Supply Chain and on Public Value, to the Scottish production sector (A3.160; A1.63-9), we would like to reiterate our previous comments that any new initiative such as this must play an important role in investing in the Scottish production sector and in developing production talent in Scotland. As we set out in our recent submission, in order for the channel to truly have an impact on the local Scottish Creative sector it requires a full commitment for this investment to be spent on employing and developing Scottish creative talent. Currently a significant amount of programming made in Scotland is directed by talent brought in from outside Scotland which is not supporting and developing the local creative sectors.

This response is submitted on behalf of Directors UK the professional association for UK screen directors, representing the creative, economic and contractual interests of 6,500 members – the overwhelming majority of working film and television directors across the UK. Directors UK collects and distributes royalty payments and is a membership organisation providing a range of services including campaigning, commercial negotiations, legal advice and support, events, training and career development. Directors UK works closely with fellow organisations around the world to represent directors' rights and concerns, promotes excellence in the craft of directing and champions change to the current landscape to create an equal opportunity industry for all.