



# **BBC Scotland: Request for changes to BBC's Operating Licence**

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21 March 2024

## Table of Contents

<b>1. Introduction.....</b>	<b>2</b>
<b>2. BBC Scotland proposal.....</b>	<b>4</b>
2.1 Introduction.....	4
2.2 Current news provision by BBC Scotland.....	4
2.3 Audience demand.....	5
2.4 Our proposed changes.....	12
2.5 Delivering against our Mission and Public Purposes .....	16
2.6 Our proposal’s market impact .....	16
<b>3. Amending the Operating Licence.....</b>	<b>19</b>
3.1 Potential Operating Licence conditions .....	19
3.2 BBC Scotland news .....	19
3.3 Compliance.....	19

# 1. Introduction

In 1923, the BBC launched its first radio service in Scotland as the organisation began to extend its reach across the nations. Since then, BBC Scotland has established Scottish programming on its BBC One opts, two television channels, two radio stations and has an extensive online presence, all providing impartial news, educational content and high-quality and creative output for Scottish audiences.

In 2019, BBC Scotland launched its BBC Scotland television channel. The channel was created to provide compelling, high-quality content that appeals to and reflects the diversity of Scottish audiences today. The channel content, broadcast from 7pm to midnight daily, has included news and current affairs, alongside innovative drama, comedy, factual, sport and entertainment programming.

News and current affairs is at the heart of the BBC's mission to fulfil our Mission and Public Purposes. It has been central to the BBC Scotland Channel offer with *The Nine* being broadcast for an hour on Monday to Thursday, *The Seven* broadcast on Friday to Sunday, alongside *The Edit* and *Seven Days* on Saturday and Sunday respectively.

We provide an extensive news offer across our BBC services in Scotland with around 5,000 hours of video and audio, and 7,000 online stories provided in English and Gaelic every year. However, the way Scottish audiences consume their news is changing and we must adapt to ensure that audiences are still being informed and educated. Therefore, we intend to:

- replace *The Nine* (Monday to Thursday) and *The Seven* (on Friday) with a new, 30-minute BBC Scotland Channel news programme at 7pm;
- trial a visualised, Scotland-focused current affairs podcast which will exist on multiple platforms (BBC One Scotland, BBC Scotland Channel, BBC Radio Scotland, BBC Sounds and BBC iPlayer);
- strengthen our *Reporting Scotland* programme on BBC One Scotland by extending from a 30-minute to an hour-long programme multiple times a year;
- increase funding for *Debate Night* on the BBC Scotland Channel during this election year; and
- build capability to deliver more innovative online reporting about Scotland on the BBC News website and the BBC News app.

Only the proposal to replace *The Nine* requires an amendment to the regulatory framework. This is because when the BBC Scotland Channel was launched Ofcom set an Operating Licence condition related to *The Nine*, i.e. an hour-long news programme in peak viewing time ("at least 250 hours are allocated to news in Peak Viewing time"). Therefore, in order to have greater audience impact with our news offer in Scotland and better deliver on our Mission and Public Purposes, we are requesting Ofcom amends this Operating Licence condition to allow for this change.

In the rest of the document, we explain our proposed changes further and the necessary amendment to the Operating Licence condition:

- Section 2 sets out our proposal for introducing a 30-minute news programme in place of *The Nine*; and

- Section 3 details sets out our suggestion of how the Operating Licence condition could be amended to reflect this proposal.

## 2. BBC Scotland proposal

### 2.1 Introduction

Consumption habits of audiences in Scotland are changing. To address these changes and ensure audiences still receive high-quality news and information in a way that best serves them, we want to evolve BBC Scotland's news offer.

We want to introduce a 30-minute news programme each weekday replacing *The Nine* and *The Seven* respectively, in tandem with a new multi-platform visualised podcast, an enhanced BBC One offer with *Reporting Scotland* extensions, more *Debate Night* episodes during this upcoming election year, and a diversified online offer.

These changes do not require changes to the Scotland News budget or impact staffing levels and would be achieved through replacing *The Nine* and associated programmes (*Seven Days* and *The Edit* which do not impact the Operating Licence). We believe this multi-platform news offer will enhance our ability to cater to audiences across all platforms and provide greater value for money for Scottish audiences.

Given these changes, we request Ofcom changes condition 4.47.2 of the Operating Licence which currently requires BBC Scotland to allocate at least 250 hours to news in Peak Viewing time in a calendar year.

### 2.2 Current news provision by BBC Scotland

We provide a diverse news offer across television, radio and online. On television, BBC Scotland broadcasts around 985 hours of news and current affairs a year through our flagship news programmes such as *Reporting Scotland*, *The Nine* and *An Là (Gaelic)*, and our innovative current affairs programmes including *Disclosure*, *Eòrpa* and *Debate Night*. We offer 4,148 hours each year on BBC Radio Scotland and Radio Nan Gàidheal through news bulletins and news programming such as *Good Morning Scotland* and *The Sunday Show*. On the BBC News website and app, readers have access to around 5,500 stories in English and 2,100 stories in Gaelic. We also regularly post on various social media platforms.

When the BBC Scotland Channel was launched, *The Nine* was introduced to deliver daily news programming, featuring international, UK and national stories, told from a Scottish perspective. The programme broadcasts from 9pm to 10pm on Monday to Thursday. On Fridays the programme is either thirty minutes or an hour long and on the weekend the bulletins last for 15 minutes starting at 7pm. In 2022/23, the BBC Scotland Channel broadcast 278 hours of news in peak viewing time.<sup>1</sup>

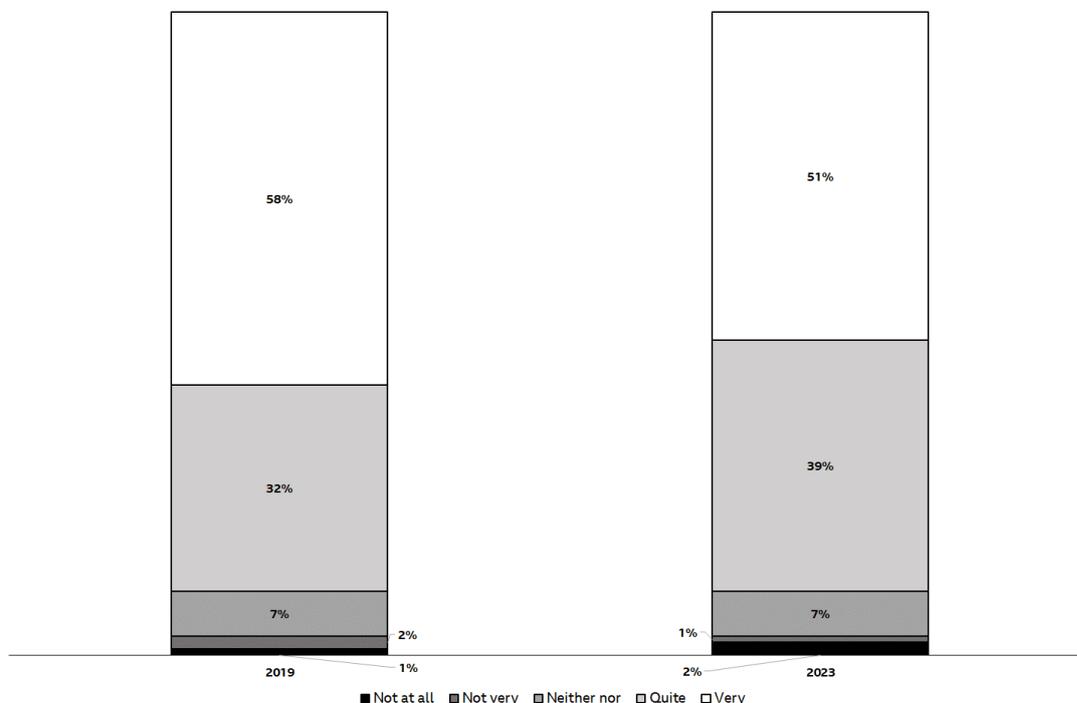
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<sup>1</sup> [BBC's Delivering our Mission and Public Purposes 2022/23 report](#), p. 71.

### 2.3 Audience demand

Scottish audiences have a keen interest in news about their nation. 90% of adults in Scotland are very or quite interested in news about Scotland, which is the highest percentage of all the nations and higher than the UK average in 2023 of 79% (Figure 1).<sup>2</sup>

**Figure 1: Percentage of Scottish audiences interested in news about Scotland**



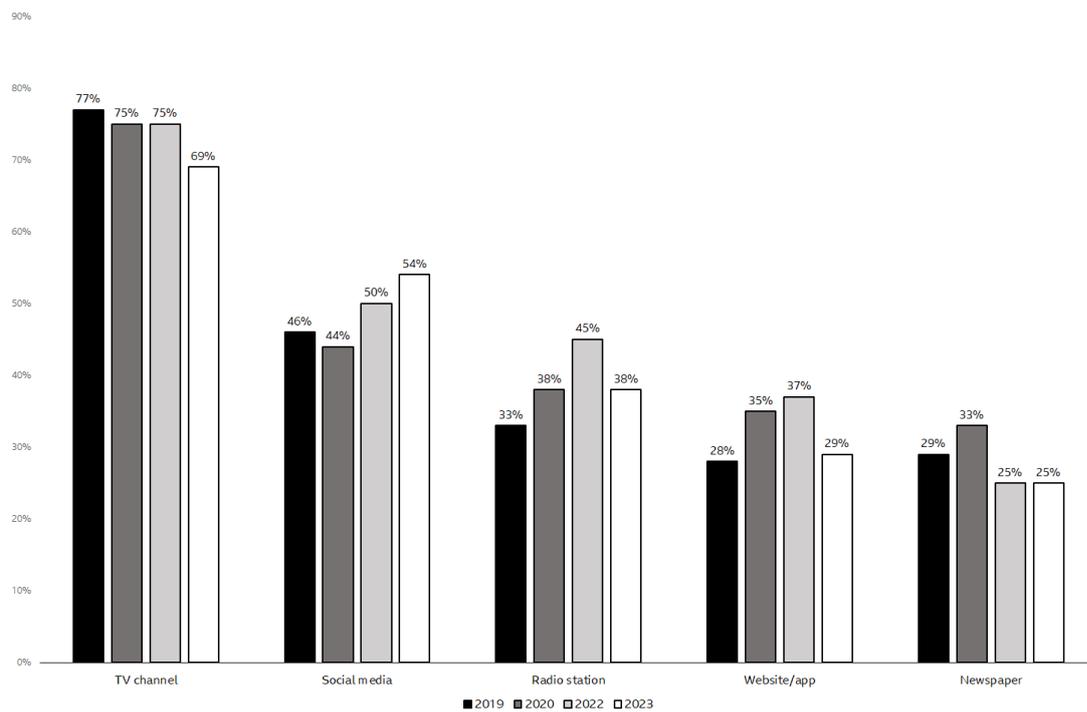
Source: Ofcom News Consumption Survey: Scotland 2019 and 2023, percentage of adults 16+ who follow news.

However, the way our audiences consume news is changing. Audiences are moving away from traditional methods of news consumption such as television and are increasingly relying on newer platforms such as social media. Whereas in 2019, 77% of Scottish audiences got their news from television and 46% from social media, in 2023 69% consumed their news from a television channel and 54% from social media (see Figure 2).<sup>3</sup>

<sup>2</sup> Ofcom News Consumption Survey: Scotland in 2019 and 2023.

<sup>3</sup> Ofcom News Consumption Survey: Scotland 2019 to 2023 excluding 2021.

**Figure 2: Platforms used to consume news in Scotland**



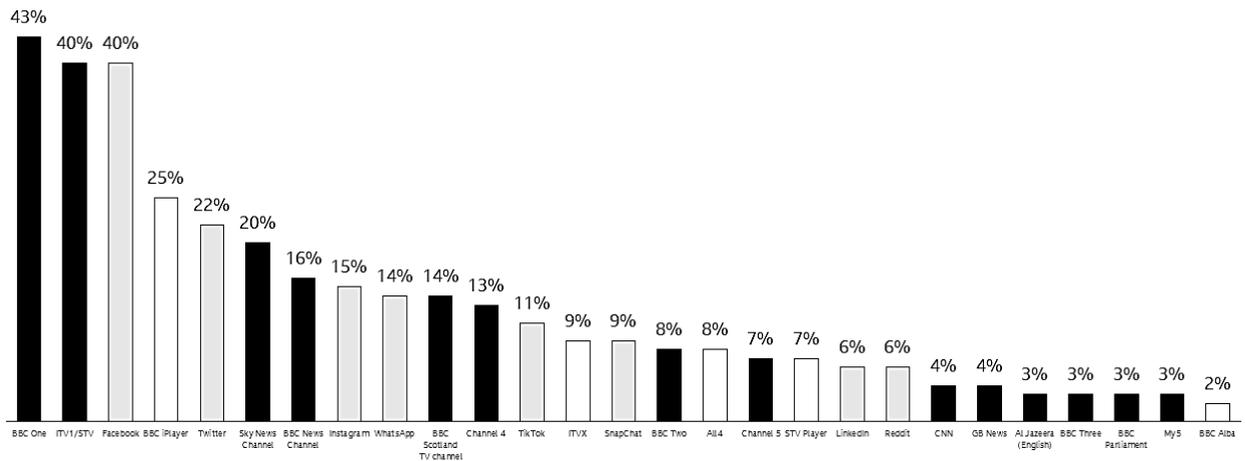
*Source: Ofcom News Consumption Survey: Scotland 2019 to 2023 excluding 2021, percentage of adults 16+ in Scotland using each source for news nowadays.*

As for individual news sources, most Scottish audiences consume news from BBC One (43%) followed by ITV1/STV (40%), Facebook (40%) and BBC iPlayer (25%). 14% of audiences in Scotland receive their news content from the BBC Scotland Channel (see Figure 3).<sup>4</sup>

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<sup>4</sup> [Ofcom News Consumption Survey: Scotland 2023.](#)

**Figure 3: TV Channels, BVODs and Social Media used for news nowadays, Scotland**

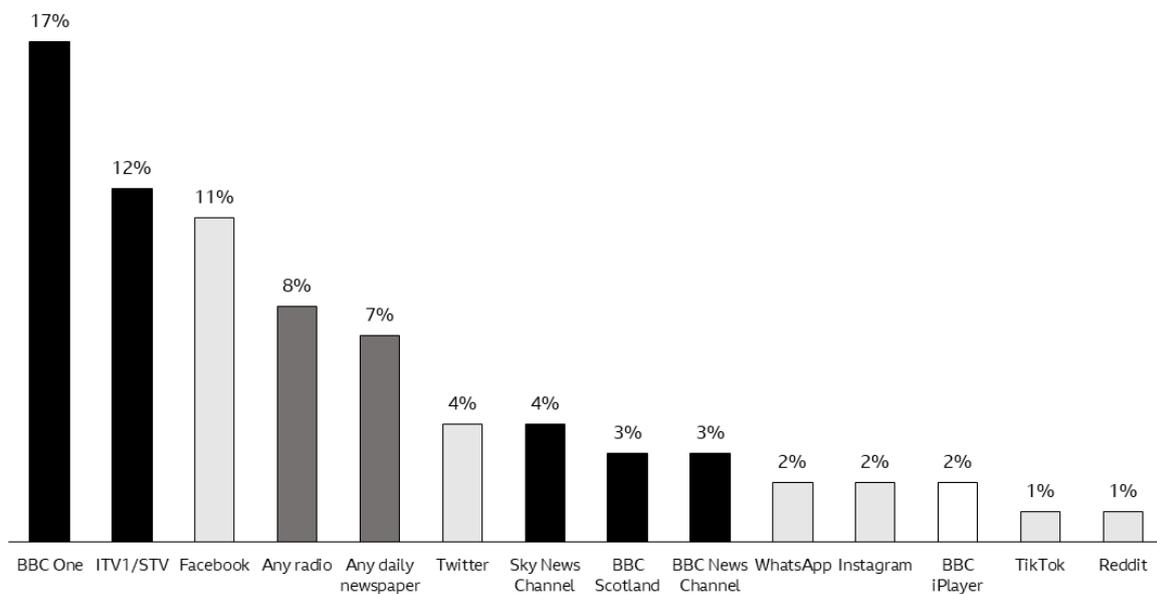


Source: Ofcom News Consumption Survey: Scotland 2023, 15+ in BBC Scotland region.

Ofcom also asked news audiences which news source was of most importance to them. 41% of respondents stated that news broadcast on television was of the most personal importance. 16.7% of news audiences in Scotland named BBC One as their most important news source, followed by STV/ITV (12%). The BBC Scotland Channel was among of cluster of other smaller television news sources – Sky News (4%), BBC Scotland (3%) and BBC News Channel (3%).<sup>5</sup> This is shown in Figure 4 below.

<sup>5</sup> [Ofcom News Consumption Survey: Scotland 2023](#), p.6.

**Figure 4: News source of most personal importance**



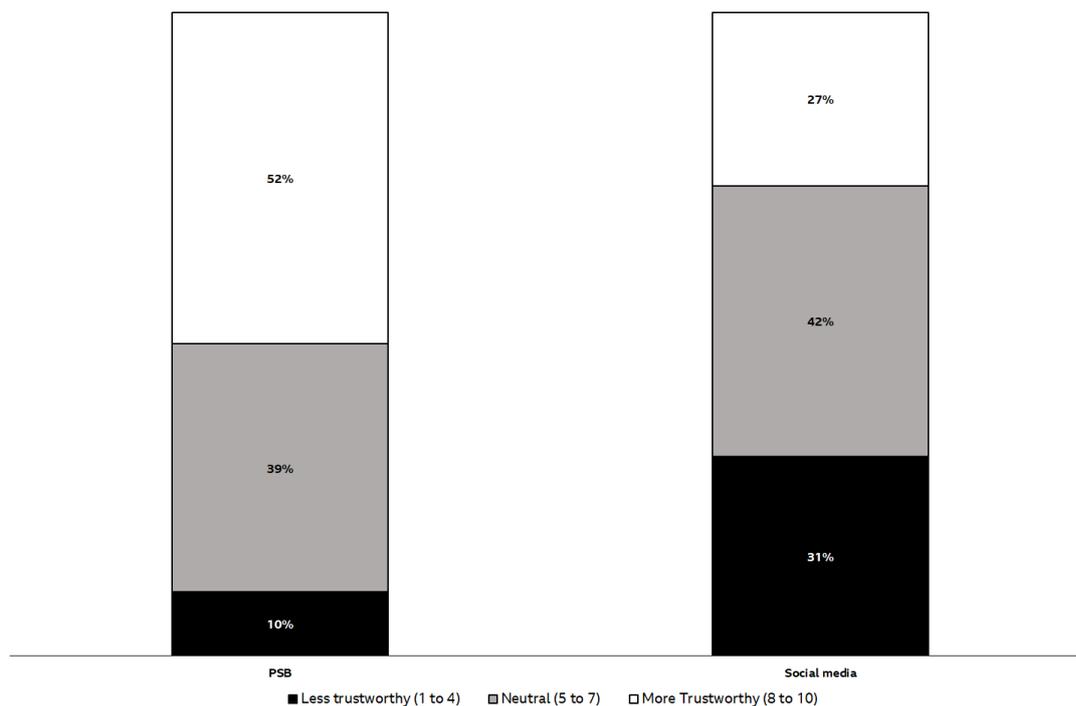
*Source: Ofcom News Consumption Survey 2023, 15+ in BBC Scotland region who consume news.*

However, despite a growing number consuming news via social media, UK audiences have less trust in the news they consume through social media than in the news consumed via PSBs, making the BBC’s Mission to provide impartial news and information in a way that reflects audience news consumption habits more important than ever (see Figure 5).<sup>6</sup>

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<sup>6</sup> [Ofcom News Consumption in the UK: 2023.](#)

**Figure 5: Trust in platforms used to consume news in the UK**



Source: Ofcom News Consumption Survey 2023.

We have also seen these structural market shifts reflected in recent audience research conducted by BBC Scotland and YouGov in February 2024.<sup>7</sup> In this study several respondents noted a shift from television to online news consumption. The majority of respondents also indicated they consumed news online more than traditional platforms like television and radio. This shift to online platforms – news websites and especially social media – was particularly stark and most apparent amongst our younger audiences.

These market-wide consumption shifts from traditional news mediums to online platforms are also reflected in the news consumption of our BBC Scotland offer. Over the last few years, there has been a decline in news reach with television audiences and radio listeners, whilst there has been a steady increase in unique visitors to our online platform.

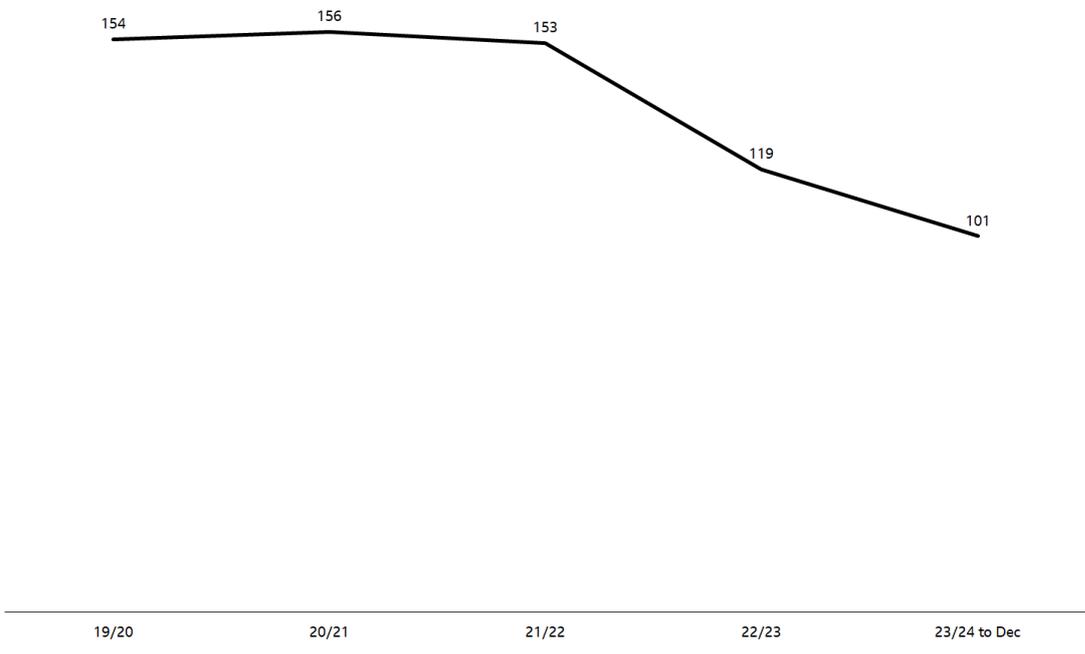
*The Nine* in particular has seen significant consumption shifts. Weekly reach was mostly stable from 2019/20 to 2021/22, but has been declining since 2021/22 (see Figure 6 below).<sup>8</sup>

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<sup>7</sup> The YouGov survey results were based on fieldwork from 27 February to 8 March 2024. The sample included 1,623 participants in Scotland aged 18+. The survey analysed the performance of *Reporting Scotland* and gaps in the news offer.

<sup>8</sup> TV BARB data.

**Figure 6: The Nine's 3-minute weekly reach since launch in 2019**



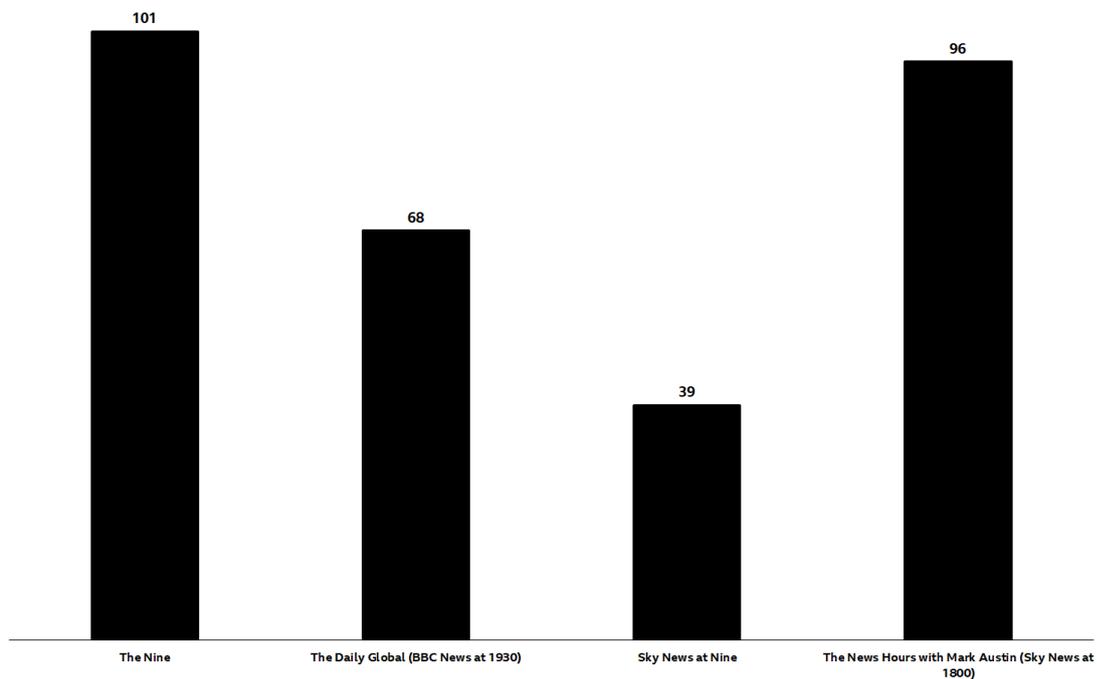
Source: TV BARB, 3-minute consecutive weekly reach amongst individuals 4+, reach figures in thousands.

Whilst *The Nine* does hold its own against programmes such as *The Daily Global*, *Sky News at Nine*, *The News Hour with Mark Austin*, it has the lowest weekly reach of the BBC's television news offer in Scotland (see Figures 7 and 8).<sup>9</sup>

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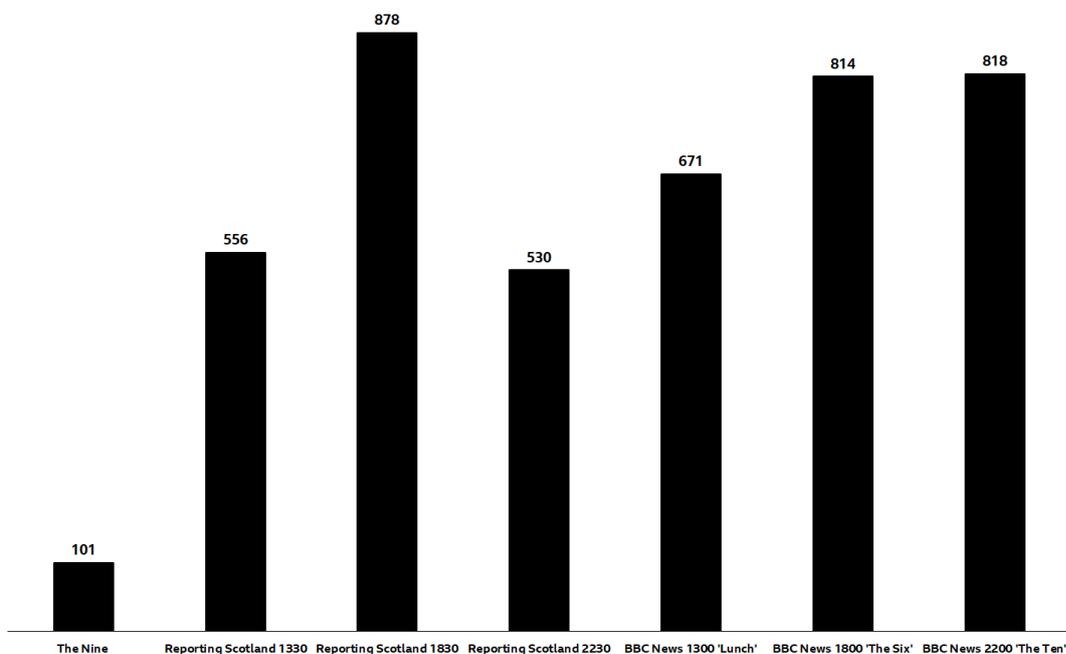
<sup>9</sup> TV BARB data.

**Figure 7: Weekly 3-minute reach of *The Nine* and evening news programmes from other broadcasters**



Source: TV BARB, 3-minute consecutive weekly reach amongst individuals 4+, reach figures measured in thousands.

**Figure 8: Weekly 3-minute reach of BBC news programmes broadcasted on television in Scotland**



Source: TV BARB, 3-minute consecutive weekly reach amongst individuals 4+, reach figures measured in thousands.

In 2020, we commissioned Hook Research to ask audiences for their opinions on *The Nine*. This research was undertaken through a week-long online panel and several workshops. The main findings from the study were:

- Some respondents challenged the 9pm airing of the news programme, stating that the time slot did not seem to suit the lives of modern Scottish news consumers and suggested the programme being broadcast at an earlier time would be preferred.
- Viewers indicated preferences for more Scottish news, suggesting *The Nine* could be used to provide a more unique perspective on Scottish issues, which in turn would make the programme more distinct from other news programmes.
- Respondents also indicated that they wanted *The Nine* to have a clearer purpose and an easier format for audiences to understand.

When Hook Research provided its findings, the trend in the decline in audience figures for *The Nine* was not apparent. Additionally, a short news programme with a different timeslot and revised focus would not have been compatible with our publicly stated commitments for *The Nine*.

In March 2024, we carried out some research with a small focus group. The respondents were all interested in news and consumed news from a variety of sources. The participants thought that a news programme at 7pm more accessible than at 9pm and gave them the opportunity to watch non-news content later in the evening. They also wanted a clear differentiation between *Reporting Scotland* and the new 7pm news programme, noting that they thought of *Reporting Scotland* as the national news programme covering daily major stories and the new 30-minute news programme could be a more informal, relaxed programme focusing on stories affecting communities across Scotland.

In this context we believe that a more innovative, shorter, sharper and earlier BBC Scotland news programme will better serve our audiences and ensure they get the best value for money for the Licence Fee.

## **2.4 Our proposed changes**

Our proposed changes involve replacing *The Nine* and associated programmes (*The Seven*, *Seven Days* and *The Edit*) with a new daily news programme on the BBC Scotland Channel, as well as delivering a more multi-platform news offer for our audiences across BBC One Scotland, BBC iPlayer, BBC Sounds and online (BBC News app and website). We provide more detail on these proposals below.

The proposed news changes will maintain the current BBC Scotland News budget and current staffing levels, and all proposals should be ready by early September in time for an upcoming election. We plan to undertake some qualitative audience research to help inform the editorial propositions of our new podcast and news programme in the near future.

### *2.4.1 BBC Scotland Channel's new 30-minute flagship news programme*

We propose introducing a new flagship 30-minute news programme on weekdays in place of *The Nine*, broadcasting at an earlier time of 7pm. This enables us to retain a daily

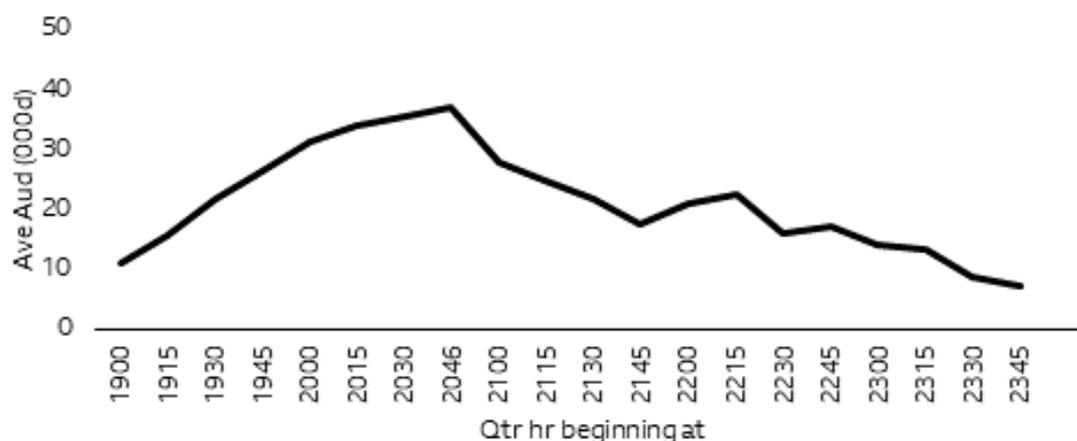
news offer on the BBC Scotland Channel, but pivot the focus, time and length of coverage in line with audience feedback.

Our intention is for the new BBC Scotland Channel news programme to have a different editorial brief to *Reporting Scotland* in both tone and story selection. The tone of the new programme will aim to be more informal and accessible to enable us to appeal “beyond the heartland” to more C2DE audiences. With regard to story selection, the new programme will aim to be more local and get around Scotland more, as opposed to focusing largely on National-level Scotland stories, giving us more opportunities to help our audiences see themselves reflected in our news coverage.

Moving to a 30-minute 7pm news programme presents an opportunity for the BBC Scotland Channel schedule. It gives us the option to bring programmes currently played in the 10pm slot forward, which we consider would attract more viewers at this earlier time. Titles include the likes of *Murder Trial*, *Body on the Beach*, *Only Child*, *Designing the Hebrides* and *Debate Night*. Ideally we will pair programmes from 9pm to 11pm – for example *Debate Night* followed by a topical documentary, a drama succeeded by a comedy, new factual titles into companion archive titles, and live sport into sport-related content such as *A View from the Terrace*. We anticipate that programmes like *River City*, where viewers have established a habit of watching at 10pm, would remain in this slot.

More broadly, we anticipate that broadcasting the new 7pm news programme will provide a better flow to BBC Scotland Channel’s schedule, beginning with news from 7pm to 7.30pm, and then offering audiences factual, comedy and drama content for the rest of the evening. We have found that retaining viewers after *The Nine* has been challenging as shown in Figure 9 below and we believe audiences will respond better to this more coherent offer on the BBC Scotland Channel. Our current scheduling can fragment the viewing experience on the BBC Scotland Channel. For example during celebratory programming for Burns Night we had to start broadcasting early, break for *The Nine*, and then resume coverage at 10pm. Our new proposed scheduling would help us solve this fragmented audience viewing experience.

**Figure 9: Average audience trend in thousands across Monday to Thursday on BBC Scotland Channel**



Source: TV BARB, average audience in 000s, all individuals 4+ in Scotland from April 2023 to February 2024.

To test the editorial and technical proposition of our new 7pm news programme, we plan to run non-broadcast pilots over the coming months to ensure the programme is ready to be launched in September. We intend to monitor the performance of the new 30-minute news programme through audience surveys and as part of the standard reviews undertaken by the BBC Board's Scotland committee.

#### *2.4.2 BBC Scotland's new visualised, multi-platform current affairs podcast*

As part of our plans to enhance our multi-platform news offer, we also intend to launch a visualised current affairs podcast. This will offer audiences a Scottish perspective on current affairs which will be broadcast on television (BBC One Scotland and BBC Scotland Channel), radio (Radio Scotland) and online (BBC iPlayer and BBC Sounds).

We believe this podcast will resonate with audiences. Firstly because audience appetite already exists with *Newscast* overperforming in Scotland relative to the population size. 11% of *Newscast* television audiences are in Scotland,<sup>10</sup> despite the nation representing 8.5% of the total UK population.<sup>11</sup> Secondly, by appearing on multiple platforms, the podcast will appeal to a wider range of viewers and listeners beyond our current linear television experience. We also think that broadcasting this visualised podcast at a later time of 11pm will pair nicely with our new 7pm news programme alongside our pairing plans for non-news content outlined above. We plan to pilot the frequency and format of the new podcast with audiences by broadcasting initially one episode a week in the near future.

#### *2.4.3 Regularly extending BBC One Scotland's Reporting Scotland*

In addition to launching a visualised podcast, our proposal includes plans to deliver extensions of our flagship BBC One Scotland news programme, *Reporting Scotland*, for our biggest stories multiple times a year.

*Reporting Scotland* has strong weekly reach with 1,370k in 2023/24 across all bulletins and 886k weekly reach for the 30-minute version of the 6.30pm programme.<sup>12</sup> We intend to strengthen this offer by building the capability to extend the programme from 30 minutes to an hour (from 6.30pm to 7.30pm). We will broadcast this extended *Reporting Scotland* dependent on the news agenda and audience demand. We currently anticipate broadcasting around 12 extensions a year. The 30-minute extension of the programme is estimated to deliver an average audience of 200k per episode. We intend to pilot the extended *Reporting Scotland* programme in June focusing on the Euros, and monitor the success of extending the programme through our usual performance metrics, which are weekly reach and average audience figures.

When *Reporting Scotland* is extended for an additional 30 minutes on BBC One Scotland, it would be broadcast at the same time as the new 30-minute news programme on the BBC Scotland Channel. We are currently testing various ways in which these two

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<sup>10</sup> TV BARB as viewed data for April to December 2023 individuals 4+.

<sup>11</sup> [UK Population 2023 data](#).

<sup>12</sup> TV BARB All Individuals 4+. These are 3-minute consecutive weekly reach figures for 2023/24 period until the end of February 2024.

programmes can work alongside each other. We will test audience reaction to help decide the best approach.

#### *2.4.4 Bolstering Debate Night and BBC Scotland online reporting*

We are also planning to bolster our *Debate Night* programming during the upcoming election year as well as diversify our online offer.

Audiences have responded positively to our *Debate Night* format on the BBC Scotland Channel with the programme's weekly reach steadily increasing since 2019. We plan to increase the number of episodes of this successful format from 24 to 30 episodes during 2024 given the fast-paced election year news agenda. We will review the format and number of episodes for future series as part of our usual recommission process.

We also plan to diversify our online offer to ensure Scottish audiences receive the same depth and frequency of live reporting, explainers and fact checking as audiences elsewhere in the UK. Subject to audience response, we want these online changes to be permanent. We will continue to monitor online performance using a range of measures including the number of people reading a story and audience demographics.

#### *2.4.5 Budgetary implications*

These proposals have been budgeted to be cost-neutral, funded through reallocation of *The Nine's* budget. We have assessed how we can apportion our current budget in a way that delivers the most for Scottish audiences, and we believe these proposals reflect the best way of getting value out of our investment.

#### *2.4.6 Stakeholder comments on the proposals*

We publicly announced our plans to make these changes on 20 February 2024. Audience reaction has been limited. We received six complaints from audience members, only half of which objected the proposed changes, particularly the cancellation of *The Nine*.

There has been some political reaction regarding the changes. The Cabinet Secretary for Constitution, External Affairs and Culture (Rt Hon Angus Robertson MSP) has publicly stated that he was opposed to the proposed reduction in broadcast news hours on the channel, and did not believe that increased current affairs output was a proper substitute for broadcast news. In the House of Commons Culture, Media and Sport's Oral Questions, John Nicolson MP (SNP, Ochil and South Perthshire and Shadow SNP spokesperson for Digital, Culture, Media and Sport) criticised BBC Scotland's plans to reduce news output, particularly the loss of *The Nine* in an election year. In private, one Labour MSP has expressed directly to BBC Scotland their disappointment at the loss of *The Nine*, while another Labour MSP has noted that the BBC has to take difficult decisions noting their awareness of both of the tough financial environment in which the BBC is operating in and of changing audience behaviours.

We have begun engagement with staff and unions through drop-in sessions which will take place over the next few months.

## 2.5 Delivering against our Mission and Public Purposes

The BBC is a mission-driven organisation acting in the public's interest. Its Mission is to “act in the public interest, serving all audiences through the provision of impartial, high-quality and distinctive output and services which inform, educate and entertain”.<sup>13</sup>

In fulfilling its Mission, the BBC must deliver great value for money in return for the Licence Fee. Alongside this Mission sit five Public Purposes that further guide the operation of the BBC. These are:

- Providing impartial news and information;
- Supporting learning for people of all ages;
- Providing distinctive content;
- Reflecting the diverse communities of the UK and supporting the creative economy; and
- Reflecting the UK to the world.<sup>14</sup>

Our proposals would enable us to deliver against our Mission and promote the first and fourth of the BBC's Public Purposes.

We will continue to provide impartial, high-quality and distinctive news output that will inform, educate and entertain audiences in Scotland according to our Mission. We want to launch the new 30-minute programme replacing *The Nine*, the visualised multi-platform podcast, extensions of *Reporting Scotland*, enhanced *Debate Night* and the diversified online offer to ensure Scottish audiences can be informed, educated and entertained from whichever platform they get their news and current affairs. All of these proposals will be in the public interest, serving audiences with a high-quality and distinctive news and current affairs offer.

Our proposals would enable us to promote the first Public Purpose to provide impartial news and information. We would enhance the ways in which Scottish audiences consume news with further investment in our online offer in response to audience consumption habits. Our news proposals and the various other news programmes we provide on television and radio will give all our audiences the opportunity to consume news the way they wish to.

Our plans would also enable us to promote our fourth Public Purpose to reflect the diverse communities of the UK. Feedback on *The Nine* was that audiences wanted to feel closer to the news and to see themselves reflected in the news stories. We will use all of these proposals to portray more stories in Scotland so audiences hear the stories about their communities, especially those which are currently underserved.

## 2.6 Our proposal's market impact

We do not consider there will be an adverse market impact as a result of replacing *The Nine* with a 7pm news programme and filling the 9pm slot with varying content.

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<sup>13</sup> [BBC Royal Charter](#), Article 5.

<sup>14</sup> [BBC Royal Charter](#), Article 6.

The news programme at 7pm which will replace *The Nine* will broadcast simultaneously with at least three other news programmes daily – one from our BBC News Channel and two from other broadcasters (Channel 4 and ITV). We do not believe there will be an adverse impact on any of these news programmes. Firstly, none of these news programmes broadcast at 7pm focus on Scottish news which is the intention of this new programme on the BBC Scotland Channel. Secondly, the audience demographics are different. 59% of *The Nine*'s audience is from a C2DE demographic compared to 63% of Channel 4 News's audience being ABC1 and only 37% being C2DE. We intend for the new 7pm news programme to have a similar audience demographic as *The Nine*.

*Channel 4 News* and *ITV Evening News* are the most comparable programmes to *The Nine*. These news programmes, like *The Nine*, have higher weekly reach figures than other 7pm news programmes in Scotland as they broadcast daily and are an hour-long. Consequently, they would be impacted the most by these proposals. However, we expect the impact to be minimal for reasons previously mentioned. Figure 10 below shows the news programmes that will be broadcast at the same time as BBC Scotland Channel's new flagship 30-minute news programme.

As described in section 2.4.1, there will be programmes across a range of genres broadcast in the 9pm slot. As other channels also have a variety of different programming at this time, we believe this programming adds to the diversity in content broadcast and is likely to have little impact on competitors.

**Figure 10: Summary and performance of news programmes broadcast in Scotland at 7pm**

Programme	Broadcasting Hours	Average Scottish Audience (000) <sup>15</sup>	Weekly 3-minute reach (000) <sup>16</sup>	Weekly 3-minute reach (%) <sup>17</sup>
BBC News' The World Today with Maryam Moshiri <sup>18</sup>	7pm-7.30pm & 7.30pm-8pm (Mon-Fri)	3	27	0.6
BBC News	7pm-7.30pm	8	41	0.8
Channel 4 News	7pm-7.55pm	49	316	6.4
GB News: Farage	7pm-8pm (Mon-Thurs)	8	31	0.6
GB News: Lee Anderson's Real World	7pm-8pm (Fri)	6	13	0.3
ITV Evening News	6.30pm-7.30pm	267	854	17.3
Sky News: Friday Night with Niall Patterson	7pm-7.30pm & 7.30pm-8pm (Fri)	6	22	0.6
Sky News	7pm-7.30pm (Sat & Sun)	5	26	0.8

Source: TV BARB, 3-minute consecutive weekly reach amongst individuals 4+ in Scotland from April 2023 to February 2024.

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<sup>15</sup> Thousands of viewers per episode averaged per minute across the episode.

<sup>16</sup> Thousands of individuals 4+ who have watched a minimum of 3 minutes of the programme within a given week.

<sup>17</sup> Percentage of all individuals 4+ who have watched a minimum of 3 minutes of the programme within a given week.

<sup>18</sup> This programme only has data for 1 week in February 2024 as the programme was launched at the end of February.

## 3. Amending the Operating Licence

### 3.1 Potential Operating Licence conditions

In order for us to implement the proposal to replace *The Nine* and its related programmes, and introduce the 30-minute news programme at 7pm, we request that Ofcom amend the respective Operating Licence condition. We have proposed an amended condition that we believe as far as possible reflects the intention of Ofcom's current condition, while providing us with the scope to enact our proposals. In drafting, we have duly considered the requirement for the BBC to fulfil its Mission and promote the Public Purposes, and we have had regard for the enforceability of any conditions.

We set out our proposed alternative condition below to show how we think the Operating Licence could be amended to allow the BBC's proposals to be enacted while fulfilling Ofcom's duty to impose an Operating Licence.

### 3.2 BBC Scotland news

Currently condition 2.47 of the Operating Licence states:

<p>4.47 In respect of BBC Scotland, the BBC must ensure that:</p> <p>...</p> <p>4.47.2 in each Calendar Year, at least 250 hours are allocated to news in Peak Viewing time; and...</p>
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We propose that this condition is amended to state:

<p>4.47 In respect of BBC Scotland, the BBC must ensure that:</p> <p>...</p> <p>4.47.2 in each Calendar Year, at least 125 hours are allocated to news in Peak Viewing time; and...</p>
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As we will be broadcasting half the number of hours of weekday news content, we propose halving the quota and decreasing this condition by 125 hours. This proposed quota will give us the flexibility to provide concise, impartial and distinctive news programming and give our audiences value for money from our BBC Scotland Channel news output.

### 3.3 Compliance

We consider in complying with this proposed condition, we could accurately and efficiently measure and demonstrate compliance, by measuring and reporting on hours of news in Peak Viewing time.

We note we would not intend to provide further evidence of compliance beyond our current practice for other Licence conditions, e.g. report hours figures as part of the compliance section in our Annual Report and Accounts, and then provide supplementary information to Ofcom as and when requested.