

Question	Your response
<p>Question 1: Do you agree with Ofcom’s provisional assessment and the proposal to reduce the news quota on the BBC Scotland channel by 50% from the current 250 hours in peak time per calendar year to 125 hours? If not, please explain why, providing appropriate supporting evidence where possible.</p>	<p>Confidential? – N</p> <p>The Advisory Committee for Scotland (ACS) is one of a number of committees and advisory bodies, established under the Communications Act (2003) to inform the work of the Ofcom Board and Executive. The ACS is one of four committees representing each of the UK’s nations, specifically to ‘<i>advise Ofcom about the interests and opinions, in relation to communications matters, of persons living in Scotland.</i>’ Therefore the responses below highlight specific considerations particular to Scotland wherever possible. This submission draws on the knowledge and expertise of ACS members and is informed by our individual experience and through discussion at our meetings. It does not represent the views of Ofcom or its staff.</p> <p>In our answer to this consultation, we believe that there are a number of important considerations that need to be discussed. Our first consideration is, if the changes suggested by the BBC to their operating licence are accepted, will it impact their ability to fulfil their Mission and promote their Public Purposes?</p> <p>The Public Purposes most relevant are:</p> <p><i>Public Purpose 1: To provide impartial news and information to help people understand and engage with the world around them;</i></p> <p><i>Public Purpose 4: To reflect, represent and serve the diverse communities of all of the United Kingdom’s nations and regions and, in doing so, support the creative economy across the United Kingdom.</i></p> <p>We agree with Ofcom’s assessment that this change will not adversely affect the BBC’s ability to deliver in these key areas. We believe that at the launch of the BBC Scotland Channel, the BBC overcommitted themselves to delivering an hour long news programme at 9pm and the decommissioning of <i>The Nine</i> seems inevitable due to its declining performance. As outlined in the BBC’s proposal, the audience engagement is not at the level expected, has been declining since 2021 and now has the lowest reach of the BBC’s television news offering in Scotland. We see no reason for the BBC to continue</p>

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	<p>along this editorial path when it is quite obviously not delivering for audiences.</p> <p>And whilst the BBC and Ofcom attribute its underperformance to a shift in audiences to online, there may be other reasons that should be noted, including editorial, budgetary and scheduling (many of which were highlighted before the channel was launched).</p> <p>We therefore believe that a reduction, as outlined within the consultation, will not diminish the ability of the BBC to deliver relevant and appropriate news coverage for their audiences in Scotland.</p> <p>The question as to how they will do this once <i>The Nine</i> has been decommissioned is our next consideration.</p> <p>The consultation question and the change to the operating framework focusses on the linear approach of quota hours – the change is from 250 hours to 125 hours. The BBC have outlined in their proposal what the 125 hours will look like but as Ofcom states these ‘are relevant to our consideration of the BBC’s request, but are not subject to our regulatory approval.’</p> <p>And so whilst there is a plan within the BBC’s change request, this consultation question and our agreement to it, does not necessarily mean that we agree with the editorial plan outlined by the BBC.</p> <p>The new plan in essence reduces the one hour programme to half an hour, includes a visualised podcast once a week, an increase to Debate nights for 2024 only and a general commitment to increasing Scottish news coverage online. This may have been a good plan in 2019, but now it feels five years too late. Audiences, technology and their competitors have all moved on. We would suggest that this moment of change is a wasted opportunity. At this point in time, the BBC in Scotland have the chance to review all its news coverage and come up with a much more ambitious plan to deliver an innovative news service with future audiences at its heart. We fear that the plan currently put forward is in essence a rearrangement of current furniture and is not going to deliver what is required.</p> <p>In their proposal, the BBC talk about their ambition to ‘Build capability to deliver more innovative online reporting about Scotland on the BBC News website and the</p>

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	<p>BBC News app.' What do they mean by 'innovative?' But is there a more fundamental question about making people go to a specific app or TV programme to get news, vs news coming to you or being integrated into other online content. They talk about improving the BBC website and app but don't mention their social media accounts e.g. BBC Scotland News on Facebook. On TikTok, Scottish news seems to be buried in the BBC News account, with no local news in the BBC Scotland account. If the focus is on accessible local news, the question has to be 'what is the best means to achieve that?' More of the same is perhaps not the best answer.</p> <p>However, as Ofcom reiterates '<i>scheduling and editorial decisions are not a matter for Ofcom under the BBC Charter and Agreement. The BBC Board is responsible for ensuring the BBC delivers its remit and for setting the BBC's strategic and creative direction. It is also solely responsible for all editorial, budgetary and scheduling decisions.</i>'</p> <p>And so whilst we are in agreement with question, we would have preferred that there be another part to the question which reinforced how Ofcom will monitor subsequent audience impact of any new changes implemented. We recognise these editorial decisions are not within the regulatory responsibility of Ofcom but the outcomes of such changes are.</p> <p>The suggestion within the consultation is that If Ofcom agrees with the change, they will '<i>monitor via our performance framework and should we require further information from the BBC to enable us to assess performance, we would request it.</i>' We also note Ofcom's '<i>ongoing ability to step in should concerns arise about the BBC's performance in this area.</i>'</p> <p>This would seem to be part of the overall general monitoring and assessment of the BBC's performance. We would suggest that this reduction in hours and the editorial changes that will follow need to be monitored much more closely, and more frequently, to ensure they are delivering. We would have preferred that reference to close monitoring and performance review should have been reiterated within the consultation question.</p> <p>As The Nine was a cornerstone for the new channel, it will be interesting to see what happens to the channel</p>

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	<p>once this is removed. Whilst this may seem a small programming change, it will affect the channel in its entirety and could result in some unintended consequences. Losing a flagship show may cause the channel to lose its direction altogether.</p> <p>We fear that the normal performance framework monitoring may not register issues quickly enough. And if these new plans from the BBC do not deliver as hoped, the question will be where next? This may be the beginning of much more seismic change to the BBC in Scotland, which Ofcom needs to be across.</p>