

## Your response

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<p><b>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.</b></p>	<p>Confidential? – N</p> <p>The Scottish Government welcomes the opportunity to respond to Ofcom's consultation on BBC Scotland channel news provision. We have a strong interest in ensuring that the BBC is able to deliver its vital public service remit, and that the BBC is held to account on its responsibilities to provide a service that meets the requirements of audiences in Scotland and across the whole of the UK. The BBC should offer a range and depth of analysis and content not widely available from other news providers, so that all audiences can engage fully with major local, regional, national (Scottish and UK), and global issues.</p> <p>While we understand that the BBC is facing challenging financial circumstances and working to adapt to changes in viewing habits, the Scottish Government believes that the BBC's proposals offer a significant reduction in the offer provided to Scottish audiences and we therefore do not agree with 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.</p> <p>As we have previously set out in our engagement with Ofcom and the BBC, we remain deeply concerned that these proposals will see significant long-term reduction in BBC Scotland and Scottish news output, meaning a reduction in valued services for Scottish audiences. Evidence in support of this view is provided in the following paragraphs.</p> <p><b>Impact of the offer to Scottish audiences</b></p> <p>While we recognise that the BBC plans to make changes, including an extension of Reporting Scotland on BBC One Scotland to one hour at multiple times throughout the year, we understand that these changes are not, as the consultation document sets out, subject to regulatory approval. We also note that these proposals from the BBC to increase hours on BBC One Scotland are not reflected in any amendments to the quotas in the Operat-</p>

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	<p>ing Licence. Importantly, it is unclear what that expanded offer would look like across the year, as there is a lack of clarity on the overall increase in provision, beyond a commitment to increasing the programme by 30 minutes 'multiple times in the year'. This could be taken to mean as little as one hour of additional news coverage across the year. The Scottish Government considers that this is not an acceptable qualification for the reduction of the news quota by 125 hours on the BBC Scotland channel. We also challenge any assertion that current affairs programming is a replacement for news – both of which remain vital as part of the BBC's obligations under Public Purpose 1. We are also of the view that content should reflect audiences wishes and should ensure that it is of high-quality, not repetitive, and that the BBC should build trust with Scottish audiences and deliver on its vital public service remit.</p> <p>As we have set out previously to Ofcom, we remain of the view that quotas are necessary to ensure that the BBC provides a substantial amount of news as well as current affairs across its TV and radio services. While we understand that improvements can be made to more effectively reflect how media is delivered and consumed today, we consider quotas important to ensuring that coverage of news relevant to the nations and regions is protected and strengthened, instead of being reduced. As we set out in our response to the consultation on the Operating Licence, the BBC, unlike the other main continuous news channels, receives licence fee funding to provide services for all of the UK that would not otherwise be provided. Other commercial operators are not providing comprehensive coverage of all nations of the UK and therefore it is incumbent that the BBC, which is funded by the licence fee, delivers this service.</p> <p>Quotas are important to measure compliance and without them, it may be more challenging to hold the BBC to account. It is vital that the regulatory framework in place is there to protect news provision, as well as current affairs and factual programming, for current and future audiences. The proposals, as they currently stand, are a significant reduction of the news output in Scotland.</p> <p>While we recognise the shift in programming towards digital, news consumption across broadcast TV remains</p>

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	<p>crucial for certain demographics. The Scottish Government strongly believes that news output must remain available to all, and there is a possibility the proposed substantial reduction in the hours of news coverage could leave behind those that need the service the most. As Ofcom highlights, audiences in Scotland continue to watch the most broadcast TV of all the nations across the UK and older people remain the highest, with the over-54s watching more than any other age group in Scotland.<sup>1</sup> Due to Scotland's demographics in terms of an ageing population, and numbers living in rural or island locations, this issue is therefore especially important in Scotland.</p> <p>Audiences in Scotland have highlighted the importance of media that everyone is able to access and say that provision of services that are available to all is a key priority.<sup>2</sup> The Scottish Parliament has a strong interest in the BBC and there is clear consensus on the need to ensure that everybody continues to be able to access the BBC, whatever their generation and however they are accessing those services. The BBC must deliver for all audiences who are still reliant on broadcast services, including older people and those in rural areas with limited access to online media.</p> <p>We note that the consultation document considers that any adverse impact on older people is likely to be minimal, and is likely to be mitigated by the BBC's proposed plans to provide a package of news and current affairs content, which it suggests will enable it to better serve all audiences. The Scottish Government advocates for a service that continues to provide news services and that does not leave any person behind. As we have stated above, there remains a lack of clarity on the increase in provision on Reporting Scotland, and we do not believe that current affairs programming is a replacement for news.</p> <p>A reduction in news output will impact service provision for audiences, and we consider that it will have a detrimental impact on the ability of the BBC to meet its obligation to take steps to reach, serve and engage with all</p>

<sup>1</sup> Ofcom (2023) [Media Nations: Scotland 2023 \(ofcom.org.uk\)](https://www.ofcom.org.uk/consult/condocs/media_nations/media_nations_scotland_2023/)

<sup>2</sup> Ofcom (2020) [The impact of lockdown on audiences' relationship with PSB \(smallscreenbigdebate.co.uk\)](https://www.ofcom.gov.uk/consult/condocs/smallscreenbigdebate/smallscreenbigdebate_2020/)

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	<p>audiences and make its news and current affairs content easily discoverable. We therefore challenge the assertion in the consultation document, which states that, overall, the proposals are likely to have a neutral to positive impact.</p> <p><b>Impact on representation</b></p> <p>The Scottish Government also believes that any downgrading of the news output in Scotland will have a detrimental impact on the BBC's representation targets and its obligations under Public Purpose 4. We know that people in Scotland value the services provided by the BBC and its content remains popular<sup>3</sup> and that levels of interest in news about respondent's own nations remain high in Scotland, with 90% of respondents saying that they are interested in news about their nation.<sup>4</sup> However, there is more that can be done to improve representation and fairness, particularly with regard to audiences across the UK being able to see a fair value of what they contribute reflected in the activities and content produced by the BBC. For 2022/23, the BBC's Annual Report shows total BBC spend in Scotland was £262m, which is still only 86% of licence fee revenue raised here, proportionately behind Wales and Northern Ireland.<sup>5</sup> Importantly, we would not want to see any reduction in the BBC's investment in Scotland and to have audiences and the creative sector unfairly impacted by proposals that reduce outputs in Scotland.</p> <p>There is significant support across many stakeholders in Scotland for a fairer approach. This has a direct impact on consumer choice within Scotland and is likely to be contributing to the fact that Scottish audiences are less satisfied with their representation on screen.<sup>6</sup> In Ofcom's recent report on the BBC, it found that audiences in Scotland were particularly negative about the BBC's portrayal of their lives, which did not show distinctive characteristics of different communities around Scotland, and 28% of audiences in Scotland gave a negative rating for the BBC's provision of 'news coverage of what is going on in my area'.<sup>7</sup></p>

<sup>3</sup> Ofcom (2023) [Ofcom Annual Report on the BBC 2022 - 23](#)

<sup>4</sup> Ofcom (2023) [Media Nations: Scotland 2023 \(ofcom.org.uk\)](#)

<sup>5</sup> Ofcom (2023) [Ofcom Annual Report on the BBC 2022 - 23](#)

<sup>6</sup> Ofcom (2021) [Small Screen: Big Debate – a five-year review of Public Service Broadcasting \(2014-18\) \(ofcom.org.uk\)](#)

<sup>7</sup> Ofcom (2023) [Ofcom Annual Report on the BBC 2022 - 23](#)

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	<p>Another impact on representation that will result from a reduction in news content being produced in Scotland for Scottish audiences is the risk that the quality of news reporting about Scotland, and from a Scottish perspective, will be reduced. This could impact the services provided to Scottish audiences in two key ways; the quality of reporting on devolved issues and with an understanding of the Scottish context, and providing a Scottish perspective across the spectrum of news coverage, from local to international.</p> <p>Ofcom's review of BBC news and current affairs found that people want to see BBC news and current affairs output focus more on the lives and concerns of communities right across the UK. It also found that people in Scotland were critical of the way in which the BBC represented stories related to their lives in its UK news coverage, which was most prevalent on issues of devolved policy, such as education and health.<sup>8</sup> Covid-19 brought devolution to the fore and highlighted the differences across policy in the nations of the UK. However, while there was more coverage of devolved matters, there were missed opportunities to explain different Government decisions across England, Scotland, Wales and Northern Ireland.<sup>9</sup> The Scottish Government would not want to see any step backwards in terms of the quality of reporting and coverage, whether that be Scottish, UK or global news, and we expect improvements to the outputs in Scotland so that Scottish audiences and their lives are reflected. It is important that news reporting is seen through a Scottish lens with a deeper understanding of Scotland and the ability to more authentically offer a Scottish perspective on national, UK and international issues.</p>

Please complete this form in full and return to [BBCScotlandchannelconsultation@ofcom.org.uk](mailto:BBCScotlandchannelconsultation@ofcom.org.uk)

<sup>8</sup> Ofcom (2019) [Review of BBC news and current affairs \(ofcom.org.uk\)](https://www.ofcom.org.uk/research-and-data/consultations/2019/bbc-news-and-current-affairs/)

<sup>9</sup> Cardiff University (2022) [Reporting the nations and devolved issues \(ofcom.org.uk\)](https://www.ofcom.org.uk/research-and-data/consultations/2022/reporting-the-nations-and-devolved-issues/)