

*Championing
excellence and diversity
in broadcasting*



Founded in 1983 by Jocelyn Hay CBE

The Old Rectory Business Centre
Springhead Road, Northfleet,
Kent, DA11 8HN
Tel: 01474 338716
email: info@vlv.org.uk
VLV: www.vlv.org.uk

**VLV RESPONSE
TO OFCOM CONSULTATION
ON
BBC SCOTLAND
NEWS PROVISION**

June 2024

INFORMATION ABOUT THE VLV

The Voice of the Listener & Viewer (VLV) is an independent, not for profit membership-based charity, free from political and sectarian affiliations. VLV supports high quality broadcasting which maintains the democratic and cultural traditions of the UK. We support the independence and integrity of the BBC and encourage work which demonstrates commitment to the principles of Public Service Broadcasting (PSB). VLV is a charitable company limited by guarantee (registered in England and Wales No 4407712 - Charity No 1152136).

INTRODUCTION

1. VLV works to represent citizens' interests in broadcasting. In making this submission it is primarily concerned with the impact which the proposed changes will have on audiences and what is in citizens' best interests.
2. We welcome this opportunity to comment on the BBC's request to change the news quota in the Operating Licence for BBC Scotland.
3. VLV understands that the BBC has requested that the number of hours of news required during peak time on the BBC Scotland channel should be reduced from 250 hours per year to 125 hours. We also understand that the BBC proposes to launch a new 30-minute regional news programme at 7pm on week nights to replace *The Nine* which currently runs for an hour each night; it intends to extend *Reporting Scotland* to an hour *at multiple times throughout the year*, although we note that the number of times is not specified; it intends to trial a new current affairs podcast which will be focused on Scotland, to improve the BBC Scotland online news service and to extend the run of the *Debate Night* programme in 2024¹.
4. VLV appreciates that the current scheduling of *The Nine* is problematic. It prevents the BBC from scheduling more popular content in this slot and also 9pm is now not a time when audiences habitually consume live news programmes. We agree that the 7pm slot would be more appropriate and would increase choice for audiences.
5. We note that there has been a reduction in broadcast TV viewing in general² and that TV news viewing has declined by 19% since 2019, although regional news viewing in Scotland is generally higher than across the UK as a whole³, suggesting a greater than average interest in regional news in the Nation. We note that the audience to *The Nine* has fallen year on year since 2020 to 10,000 on average in 2023⁴. At the same time there has been an increase in the number of adults in Scotland using online platforms to access news⁵.
6. VLV understands that the motivation for these proposals is not to reduce the budget for the BBC's news provision in Scotland – they will be cost neutral - but to redistribute it so that its news and current affairs output in Scotland has greater impact. VLV would like Ofcom to ensure that the budget for current affairs and news provision in Scotland are maintained, as is suggested by these proposals.

Consultation question: Do you agree with Ofcom's provisional assessment and the proposal to reduce the news quota on the BBC Scotland channel by

¹ https://www.ofcom.org.uk/__data/assets/pdf_file/0026/284372/BBC-Scotland-Request-for-changes-to-BBCs-Operating-Licence.pdf

² *BBC Scotland news provision - Consultation on BBC's request to change its Operating Licence*, Ofcom, 3 May 2024 paragraph 3.1

³ Ibid paragraph 3.2

⁴ Ibid paragraph 3.16

⁵ Ibid paragraph 3.6

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.

7. While VLV understands the rationale for the BBC's proposals and believes they could be beneficial for citizens in some respects, VLV has a number of concerns which we have set out below.
8. We consider that 7pm would be a more popular and appropriate time for *The Nine*, increasing audience choice of news at 7pm. This change also could increase the reach of the programme. We also welcome the development of a Scottish BBC podcast and an improvement of other Scottish BBC news online, which would extend audience choice as well.
9. VLV welcomes that this proposal aims to make news content more accessible for the C2DE audience; we note that the BBC says '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 audiences⁶.

10. VLV Concerns

Podcast

- a. We note that the proposal to develop a Scottish current affairs podcast is only a trial. If the BBC decides to not go ahead with the podcast in the longer term, we question what will happen to the budget assigned to this project. Will it be redistributed to ensure that Scottish current affairs and news are improved elsewhere?

Debate Night

- b. We note that the increased budget for *Debate Night* is only for 2024. Again, VLV questions how will this 'spare' budget be used from 2025 onwards?

Reporting Scotland

- c. VLV notes that no detail is provided by the BBC on the number of extended *Reporting Scotland* programmes. We would welcome more detail on this.

Duplication of BBC news at 6pm and 6.30pm

- d. VLV considers that the BBC should aim to complement, rather than duplicate existing provision, and we would welcome greater clarity on the editorial mission of the proposed 7pm programme to ensure that it is genuinely distinctive from the other Scottish news programmes available early evening.
- e. VLV's main concern about these proposals is that the new news programme at 7pm should be distinctively different from *Reporting Scotland* at 6.30pm and the *BBC News at Six* programme. If a news item about Scotland is of UK national interest it is likely to be covered in the *BBC News at Six* and then possibly repeated with a more local approach on *Reporting Scotland* at 6.30pm. VLV questions how the 7pm programme will avoid duplication in this instance.
- f. *The Nine* has been notable for providing original content which has not been recycled from other programmes broadcast during the day on BBC channels. We would like this

⁶ https://www.ofcom.org.uk/_data/assets/pdf_file/0026/284372/BBC-Scotland-Request-for-changes-to-BBCs-Operating-Licence.pdf

distinctiveness to be maintained. VLV would recommend there is a requirement that content in the new 7pm news programme should be new and original so that it does not re-package or duplicate stories already shown on the *BBC News at Six* or *Reporting Scotland*. It seems to VLV that the arguments for a *Scottish Six* could be justifiably reignited by these proposals, unless the 7pm programme is genuinely original and presents news from a Scottish perspective, without duplicating *Reporting Scotland*, which will be extremely difficult. All three programmes (the *BBC News at Six*, *Reporting Scotland* and the new 7pm bulletin) will have to be clearly distinct from each other in tone and content.

- g. On the occasions that *Reporting Scotland's* duration is extended, we note this will clash with the 7pm news on BBC Scotland channel.

Duplication of STV news

- h. The BBC proposal aims to 'to be more local and get around Scotland more, as opposed to focusing largely on National-level Scotland stories⁷'. While we understand that BBC research indicates that audience preference is for a shorter bulletin, scheduled earlier in the evening and focused more on regional stories⁸, VLV is concerned that the proposed 7pm BBC Scotland programme might duplicate *STV News at Six* which is regionally focused and runs for 30 minutes. It is VLV's view that in order to allay any concerns STV might have, the BBC must put in place firm commitments to ensure that any change in its approach provides material which is distinctive in comparison with STV output at 6pm.

11. Clarification of Weekend News

The BBC proposal refers to the introduction of a new '**daily** news programme on the BBC Scotland Channel' however it goes on to say it will only be run on weekdays. It is not clear whether the channel will broadcast a 7pm news on Saturdays and Sundays. We would welcome greater clarity on this point.

12. In conclusion, VLV believes that these proposals should be approved by Ofcom as long as the following conditions are met:

- The new 7pm news programme on the BBC Scotland channel is genuinely distinctive in its approach and content
- Overall the current affairs and news budget for Scotland is not reduced
- The BBC increases the ways it delivers news and current affairs content to Scottish audiences.

⁷ https://www.ofcom.org.uk/__data/assets/pdf_file/0026/284372/BBC-Scotland-Request-for-changes-to-BBCs-Operating-Licence.pdf

⁸ https://www.ofcom.org.uk/__data/assets/pdf_file/0026/284372/BBC-Scotland-Request-for-changes-to-BBCs-Operating-Licence.pdf