## Submission to Ofcom's Second Public Service Broadcasting Review: Phase 2: preparing for the digital future

- 1. I welcome the reference (paragraph 5.94) on page 85 in the report to the concept of a UK-wide strategy for indigenous language broadcasting. However I have deep concern about the Ulster-Scots section in the report.
- 2. 'Many within the Ulster-Scots community believe that a sense of Ulster-Scots identity is as likely to be based on an association with wider factors as with language and that broadcasting should reflect this and not just capture Ulster-Scots language.' (paragraph 5.91)

The statement is true but it is also true for all seven officially recognised indigenous minority languages in the United Kingdom and not just Ulster-Scots. For example, there are many people whose sense of an Irish identity is based on an association with Gaelic games or Irish traditional music as much as with language. Why then is this statement only applied to Ulster-Scots?

Public service broadcasters should reflect, in an appropriate way and to an appropriate degree, both the linguistic and the cultural diversity of Northern Ireland.

Language programmes may be set in a cultural context but language and culture should not be conflated. For example, an Ulster-Scots music programme, with no Ulster-Scots language content, is not an Ulster-Scots language programme and should not be considered or counted as such.

If they are conflated we might argue that there is no need to have Irish language broadcasting, or at least much less, since there are reports and programmes about Gaelic football. Such a conflation would not be acceptable to Irish language enthusiasts and neither is such a conflation acceptable to the Ulster-Scots community.

There should be fair treatment for the Ulster-Scots language AND for Ulster-Scots culture and that will mean more Ulster-Scots language broadcasting AND more Ulster-Scots cultural programming.

I fear that the contentious sentence, which conflates language and culture, has been included so that broadcasters can justify less favourable treatment for the Ulster-Scots language. It has the potential to perpetuate systematic discrimination against Ulster-Scots by passing off cultural programming as language programming.

3. 'Ofcom's Advisory Committee for Northern Ireland believed that coverage of Ulster-Scots cultural activities should be acknowledged as Ulster-Scots content.' (paragraph 5.93)

This sentence is ambiguous and therefore dangerous. Coverage of Ulster-Scots cultural activities should be acknowledged as Ulster-Scots

cultural content and if it does not contain any Ulster-Scots language it should not be passed off as Ulster-Scots language programming.

4. 'Ulster-Scots would benefit in terms of profile and self-esteem from being mainstreamed in Northern Ireland broadcasting.' (paragraph 5.93)

As an important aspect of our cultural diversity, Ulster-Scots language and culture should be mainstreamed but that should not be used as an excuse to avoid producing specific Ulster-Scots programmes. The two approaches should be seen as complementary.

5. 'BBC Northern Ireland is producing, and intends to produce more material in Ulster-Scots and relating to Ulster-Scots than ever before.' (paragraph 5.92)

At present there is very little Ulster-Scots language broadcasting on radio and almost nothing on television. There is a commitment to produce 'more' programming but more than 'almost nothing' can still be 'almost nothing'! There is a specific commitment to double Irish language broadcasting over the next three years but there is no such quantitative commitment for Ulster-Scots and that is disappointing. There should be a gradual and incremental increase in the level of provision, there should be specific targets, and they should be benchmarked against the provision for the Irish language.

6. The absence of an Ulster-Scots Language Broadcasting Fund, similar to the Irish Language Broadcasting Fund, has disadvantaged Ulster-Scots and an appropriate funding stream for Ulster-Scots broadcasting should be introduced. This would help to ensure that programming reflected the indigenous linguistic and cultural diversity of Northern Ireland.

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