



## Response to Ofcom Consultation from Bòrd na Gàidhlig

### Holding the BBC to account for the delivery of its mission and public purposes

#### Background

Bòrd na Gàidhlig welcomes the opportunity to respond to the consultation on holding the BBC to account for the delivery of its mission and public purposes. Our role is to promote and develop the Gaelic language and culture. Our vision is that Gaelic has a sustainable future as a healthy, vibrant language, increasingly used and respected in a modern, multicultural and multilingual Scotland.

We aim to increase the number of Gaelic speakers and expand the range of opportunities for people to use the language, as well as raising the profile of the language and culture in Scotland and abroad. We work with a wide range of public bodies in developing Gaelic language plans, with community groups and others through funding support for their work and projects, as well as providing advice to Scottish Ministers and others on Gaelic development.

Bòrd na Gàidhlig is responsible for producing a five-year national Gaelic language plan and this year, we drafted the Plan for 2017-2022. It is currently being considered by Scottish Ministers for publication.

#### Aims for Gaelic

There are three main strands to the National Gaelic Language Plan 2017-2022. It focuses on increasing the usage of Gaelic, increasing the learning of Gaelic and promoting the language and culture. BBC ALBA has a fundamental role in delivery of all three aspects of the Plan and as such, its work is of crucial importance in supporting all those who use the language, in making Gaelic a normal part of Scottish daily life and providing access to everyone to enjoy and experience Gaelic culture.

#### Gaelic Communities

The Plan also identifies three broad types of community that Gaelic development needs to support.

- The communities, mostly in the islands of north-west Scotland, who use Gaelic daily and where numbers of speakers still form a high percentage of the population,
- the growing communities in towns and cities which are primarily centred around the growth in Gaelic medium education, and
- the digital community, spread across the world and comprising an increasing number of young people who consume a large part of their entertainment online.

The wider Scottish community is also very important to growth in Gaelic. Research carried out in 2013<sup>1</sup> showed that 80% of respondents strongly agreed that Gaelic is a significant and important part of Scotland's heritage, and BBC ALBA was cited as the main reason for this view.

### **Gaelic and the Economy**

In recent years, the economic value of Gaelic has been increasingly researched and its impact on the traditional communities is of importance in terms of employment creation, wealth generation and population retention. A study carried out by Highlands and Islands Enterprise in 2014<sup>2</sup> estimated that the potential value of Gaelic as an economic asset was up to £150million per annum.

A separate study estimated that MG ALBA, joint partner in BBC ALBA with the BBC, had the following impacts in the Islands<sup>3</sup>

Employment (FTE)	49.7
Income (£)	1,282,232
Gross Value Added (£)*	1,092,822

The impact of the television production contracts is estimated as:

Employment (FTE)	50.3
Income	(£) 1,359,890
Gross Value Added	(£) 2,352,121

### **BBC ALBA and Radio nan Gàidheal**

We trust that it is clear from the foregoing that flourishing, wide-ranging, and high-quality Gaelic television and radio channels are essential to the growth of Gaelic in Scotland and elsewhere. We are of the view that appropriate funding and an effective regulatory regime are the main mechanisms to ensure that these channels are delivered.

With reference to BBC ALBA, we are of the view that the channel should reflect the BBC's mission 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.

BBC ALBA is the equivalent of BBC One for the Gaelic community, a community which is comprised of people from diverse backgrounds with many different interests and therefore seeks a channel which reflects this.

### **Current provision in BBC ALBA**

The BBC currently contributes around 4.2 hours per week to BBC ALBA. Even after MG ALBA's contribution, the channel remains over reliant on repeats with 74% of broadcasting consisting of repeat content (MG ALBA 2016). There is significant concern about this situation.

This concern has been expressed by a number of key interests and the BBC Audience Council for Scotland Review concluded that *'BBC ALBA ... [was] performing well...The channel exceeds the targets set for it by the [BBC] Trust but suffers from under-funding which may not be sustainable in the longer term.'*

In addition, there are certain key areas of programming that need to be increased on BBC ALBA. Our clear view is that if the channel is to deliver a 'wide and diverse range' of programming, this would require additional investment from the BBC.

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<sup>1</sup> Scottish Social Attitudes Survey, 2013

<sup>2</sup> Our Gaelic Asset – Highlands & Islands Enterprise, 2014

<sup>3</sup> Economic Impact of MG ALBA: Final Report 2015 – Reference Consultants

## Recommendations

The BBC Framework Document includes the commitment that the BBC should ‘ensure that a wide and diverse range of high quality programmes is made available to persons in Scotland’ in Gaelic and we welcome this commitment.

Similarly, Ofcom’s consultation makes particular reference to diversity (4.119-4.127) and we would anticipate this being reflected in requirements made of BBC ALBA. In addition to the Gaelic community, BBC ALBA draws a much wider audience, consuming sport, music and factual/documentary programming and the definition of BBC ALBA’s purpose should be widened to beyond solely Gaelic-interest.

Ofcom has set a 75% original productions target for BBC ALBA which can include repeats. This does not place a duty on the BBC to increase its investment or provide additional content for first run programming. In contrast, Ofcom has set first run targets for CBBC and CBeebies of 400 and 100 hours respectively. We would recommend that Ofcom establishes a target for first run programmes in the Framework and performance is monitored on this basis.

We would also recommend that this target should equal any other first run targets set for other minority languages. As well as better serving audiences which is the primary aim, an increased target would have a consequent beneficial impact from BBC ALBA on the role of the creative industries in the Gaelic economy.

As an illustration of the difference in funding but the similarity in reach on a national level and indigenous language level, the following table is helpful.

	Average national weekly reach	Indigenous language reach (%)	BBC Funding	Online views
BBC ALBA	657k*	74%	c.£7.4m	5.3m
S4C	629k	79%	£75m	8.2m

\* 15% of the Scottish population above age 16.

S4C receives over 10 times the amount of funding of BBC ALBA from the BBC despite there being a similar reach among indigenous language speaking audiences and a higher weekly reach on BBC ALBA. This disparity was highlighted to the BBC throughout the Charter renewal period and the BBC was asked to consider providing the same level of Gaelic language programming to BBC ALBA as it does for S4C in Welsh: 10 hours of original programming per week. On the question of additional funding the BBC Audience Council for Scotland’s said in 2016: *‘BBC Gaelic services should be entirely funded from the centre, not from BBC Scotland’s budget, and the BBC should set a strategy to resolve any inappropriate disparity in the funding of BBC indigenous minority language services across the UK.’*

While not part of the current Consultation documents, we would like to take the opportunity to draw Ofcom’s attention to the BBC ALBA’s placings on the EPGs, particularly in Freeview. In future developments, we would wish to see these placings retained by BBC ALBA as it is important to the channel’s accessibility and the normalisation of Gaelic within wider society.

The BBC has recently published its Creative Plan for 2017/18, including an announcement of a significant investment for children’s programming. We would recommend that quotas for first originations for children’s Gaelic programming, and for online developments aimed at the youth audience, are established, to ensure that these two sectors are given the support required to ensure continued and increased engagement.

The Creative Plan also provides further detail on the proposed BBC Scotland channel. Significant new investment in television provision in Scotland is very welcome. The BBC said, *‘By launching the new channel and making the new investment, we are saying that obvious benefits will accrue to BBC Alba.... We estimate that we will be able to offer an additional 100 hours of originated programming to the*

*service. We currently offer 4.2 hours of origination a week, and we would like that to increase over the next few years by 3 hours to 7.2 hours.'* (BBC Scotland to the Scottish Parliament's Culture, Tourism, Europe and External Relations Committee). The BBC also referred to the possibility of co-commissioning between BBC ALBA and the new Scottish channel. We would seek clarity, however, on how this investment will benefit BBC ALBA and look to the regulatory framework to provide context and targets which support BBC ALBA and its provision.

We would also seek that the BBC look at its parity in programming between indigenous language radio. Currently the BBC provides £14.2m to Radio Cymru but only £3.9m for Radio nan Gàidheal. Radio nan Gàidheal continues to have a high reach (69%) among the Gaelic speaking population of Scotland (BBC Annual Report 2015/16). We would seek that the BBC address this disparity to enable Radio nan Gàidheal to further serve its audiences in Scotland.

Furthermore, Ofcom sets a requirement that Radio Cymru is available throughout Wales (Schedule 4 The UK Public Services). We would ask that a similar commitment is made for availability of Radio nan Gàidheal throughout Scotland.

Overall, we would recommend that Ofcom is more ambitious for Gaelic, in terms of television, radio and online content, ensuring that the diverse community of Gaelic speakers and non-speakers is served by the BBC. This would include raising targets which are already being met or exceeded; setting new targets for first-run original productions; ensuring that new content for learners is created and broadcast; and that the development of a new BBC Scotland channel at the very least does not detract from BBC ALBA and in fact adds to the national identity as delivered through BBC ALBA and Radio nan Gàidheal.

14 July 2017