

## **OFCOM: The BBC's services in Scotland**

- Holding the BBC to account for delivery of its mission and public purpose
- The BBC's Services in Scotland

Submission by a group of RSA Fellows and invited colleagues with relevant experience, expertise and interest, sent on their behalf rather than the Society as a whole.

**CAVEAT: For reasons of governance, it should not therefore be construed a formal response on behalf of the RSA [www.theRSA.org].**

The group consulted and whose observations led to this submission included:

- two long since retired BBC staff (one at BBC Shetland for 15 years, later an MEP and Council Convenor and also one ex who had also worked for both BBC and BBC World Service);
- a former IBA Advisory Committee Scotland member and one time VLV member;
- a culture consultant who works both in and outwith the UK;
- an academic being also an immediate past VLV Board Member
- others with relevant cultural interests including an elected Councillor.
- ***SUBMISSION effected by E A Packard***
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**Key points are listed and some questions for consideration raised.**

At the heart of these is the question of the prism through which Ofcom will look: is it too narrow? What of granularity and representation? What of BBC investment? What of communities of interest or ethnicity as well as geography?

1. The desire by Ofcom to simplify regulation should not become too "light touch"
2. The Content Board composition does not at this time adequately reflect Ofcom's current range of broadcasting responsibility. Specific comments included the lack of long-standing involvement in, and knowledge of, culture and sports as most of the Content Board currently have news backgrounds/specialities. The remit remains: "Entertain, educate, inform". All genres deserve degrees of representation.
3. Scotland input at all levels of Ofcom needs radical strengthening. It is noted there is current recruitment which may assist this.
4. Modern governance may require changing levels of scrutiny and transparency, noting always the Parliamentary scrutiny (UK and Scotland).
5. Issues of digital connectivity and radio coverage in Scotland, affecting both consumer choice and basic ability to access all the BBC's services including the new channel
6. The process and effect of the new channel on other services including BBC 2
7. The need demonstrably to reflect the different languages in Scotland – Gaelic is dealt with by legislation, so what of Scots, Lallans and Doric? And what of cultural differences between, say, Borders and Highlands and Islands and other cultures and languages or groups such as the Polish community? Can aspects of regulation contribute to diversity, inclusion, cohesion and multi-culturalism?
8. In respect of the West Highlands and weekend broadcasting, has sufficient thought been given to the Sunday cultural and religious practices/traditions of that area? The suggested timings may not chime easily with all either indigenous or in its diaspora.

***Continued/- 9. et seq numbered points follow overleaf on second of two page document***

9. With reference to the 8% of hours/spend for Scotland which the BBC must now fulfil, the case should be argued that this should be higher - or at least with clearly stated aspirations for pre-determined and published increments year on year, both to represent the changing demography of the UK and to give "Indies" the ability to forecast the potential for both income and investment (e.g. infrastructure and staffing).
10. How, if at all, can Ofcom by regulation increase and promote the concept of regional production centres across mainland and island Scotland? [See 2.44]
11. Is it the case the 8% formula does a major disservice to the rurally dispersed and diverse population of Scotland. People, especially older, isolated and vulnerable groups are much more dependent on the BBC for cultural and current affairs than the more affluent in more urban areas: Should this not be recognised in the funding formula? Regulation should be for inclusion as also for PSB and technical adherence!
12. Is the idea of a two tier BBC with pay to view /listen services contrary to the original purpose and ethos of the BBC?
13. Moving commissioning powers to Scotland, though it is appreciated this is more essential for the BBC
14. More accurate representation of Scotland and its people on the BBC network including representation on the network and BBC Scotland of the range of communities in Scotland
15. More relevant local opt outs, especially in, say both Borders and Highlands
16. At 2.48 expenditure ratio is mentioned as "outwith the M25 area" – but this includes Salford which may affect the overall percentage desire of "at least 40%"? Should it be more explicit notably about the devolved nations?
17. At 2.52 do the devolved nations receive appropriate Parliamentary viewing time and as fiscal devolution rolls out in Scotland, should this increase in Scotland given difference(s) in legislative competence v. Wales and/or Ireland?
18. At 2.63 there seems inadequate definition of community programming
19. At 2.79: If the BBC designs measures of audience satisfaction, would it not be better for these to be designed with measures of external input for transparency?
20. At 2.81: Is it for the BBC to establish a code of practice or would it be better for Ofcom to design this as an issue of formal regulation?
21. How will Ofcom view/regulate the balance between high quality/low hours v. low quality/high hours production since the one may be better for communities and the UK whilst the other may provide international earnings?
22. A single operating licence is thought out of sync with the devolution of responsibility for culture to Scotland and marginalises Scottish oversight and influence. Is there scope for change?

**NOTE: The RSA, usually via the approved Fellow led "Media, Creative Industries, Culture & Heritage Network", has held various events in Scotland on broadcasting in recent years, at times in conjunction with the BBC, or with e.g. VLV, Napier University, or, as in January 2016 with CCPR, University of Glasgow, VLV and others. Venues for these events have included the Scottish Parliament to promote MSP attendance, whilst the event in January 2016 held at and with CCPR saw an attendance of around one hundred delegates.**