

Consultation on the new BBC Scotland Channel

Proposed variation to Ofcom's Operating Licence for the BBC's public services

Response by Professor Robert Beveridge FRSA

Do you agree with Ofcom's proposed approach to amending the Licence set out in this consultation and the proposed amendments to the Licence set out in paragraphs 2.2 to 2.29 ?

1.

In common with many viewers and listeners in and across Scotland, I welcome the arrival of the new BBC Scotland Channel and Ofcom's decision to approve this long overdue development.

In relation to this proposed variation, I wish to make the following observations:

2.

Approach

Ofcom's overall approach to regulating the BBC - ie not only in respect of the new BBC Scotland Channel – is not reflective of its oft stated commitment to 'light touch' regulation

Ofcom needs to give serious attention to considering when it crosses a line and starts to micro-manage rather than regulate per se.

3.

95% quota

There are particular problems associated with the requirement that

'At least 95% of the BBC SC's output would consist of programmes made in Scotland.'

While it is true that the BBC (and indeed ITV and other PSB's) need to

a)

Improve their portrayal and representation of Scotland's culture(s)

b)

reflect and deliver more content designed to reflect the lives of people in Scotland

c)

invest in the creative economy of Scotland -

setting a threshold of 95 per cent to be made in Scotland begs a number of questions.

3.1

What would happen if a programme were made on the theme of Scottish diasporas and a good proportion of the filming were to take place outside Scotland

For example: Australia or Canada or- to take another possibility, relations between Italy and Scotland or perhaps programming on and about Scots living elsewhere in the UK.

Would such programmes- which could be said to reflect, represent and serve the nation of Scotland - meet the 95 per cent threshold/quota?

3.2

Against the backdrop of concern about the relatively low overall budget for the new channel- concern which I fully share- how would Ofcom approach this issue?

It could be that BBC Scotland chose to invest a high sum in a drama or drama series, made in and for Scotland- which helped to meet the representational and creative economy needs of the nation but which then left very low funds available for other genres and/or put at risk the ability to meet the 95 per cent quota.

Consider further that such drama was a huge popular and critical success. Would Ofcom then be seeking to penalise the BBC?

This issue of high cost/funding but low hours in meeting the quota is one which might better be left to the BBC itself to make and more importantly be allowed to make -a case for discretion.

4.

News programmes

The proposal that the

The BBC SC should provide a suitable range of programmes (including regional news programmes).

is welcome, especially since the BBC has been accused of being rather Glasgow centric in its culture and programming.

But again, this proposal as outlined is redolent of micro managing. Is Ofcom requiring separate news programmes per se or would clear and salient attention to news across the country – as evidenced in the News at 9- be deemed as sufficient to meet this need?

Of course it would be good to see the BBC broadcast the equivalent of STV news bulletins thus giving the capital Edinburgh – better coverage which is long overdue.

If Ofcom is determined to micro manage, such a result might well justify the approach but it could be argued that would be better if the BBC were to retain a fuller measure of independence but meanwhile of its own accord also improve news coverage outside Glasgow. Let us hope that it does so and soon

5.

Gaelic

There is a strong case for Gaelic programming being broadcast on the new BBC Scotland Channel

5.1

Ownership

It is important that the nation of Scotland as a whole feels ownership of this new channel. If the rhetoric around the Channel is to become a reality then this means not only an *Out of Glasgow* strategy but programmes which reflect and represent the nation in all its diversity which means the inclusion and presence of the Gàidhealtachd

5.2

Diversity

It is widely acknowledged, not least by DG Tony Hall, that there is damage to democracy and society caused by the retreat into intellectual and political silos.

The presence on this new channel of content and perspectives from the Gàidhealtachd would help to foster inclusion rather than exclusion: true diversity and recognition of the need for all to engage with minority culture(s)

5.3

Serendipity

At the heart of PSB and the BBC's mission to inform, educate and entertain, is serendipity. The experience of coming across, by accident, a wonderful programme which captures your interest and stimulates further exploration etc.

While it is good that we have had 10 years success from BBC Alba, it is equally important to schedule for serendipity and to use the new channel for marketing and as a shop window for new content from BBC Alba as well as the new Channel

5.4

Business Sense

As well as being sound policy in cultural terms, it is also good business sense to make the best use of quality content so that greater and wider audiences can enjoy such programmes.

Those who otherwise not think of tuning into BBC Alba might thereby be persuaded to try it – a win-win strategy

5.5

Therefore

My inclination at present is to trust the BBC to place Gaelic programming on the new channel – either as stand alone or co-productions/commissioning.

Ofcom should seek a commitment to this and monitor the first two year. Then if there is poor performance regulatory conditions should be considered.

I leave it to BBC Scotland and BBC Alba and Ofcom to determine what might constitute an acceptable performance measure for Gaelic content

6.

Spectrum and Access

We were promised that digital switchover would lead to the end of spectrum scarcity and more choice.

However, some of the spectrum is used up by plus one channels which is far from adding to choice or promoting quality, distinctiveness and new content.

Moreover, in England there is a substantial Scots diaspora –around 750,00 at the 2014 census - who would constitute a ready and interested audience for the new Channel.

This is not to say that other viewers would not also be interested in viewing the channel. Indeed, it could be argued that it is the BBC's duty to help the citizens of the UK to understand one another- the more so in a time of political and cultural polarisation.

Therefore the new channel should be made fully available south of the border and Ofcom should ensure that this happens. It is not sufficient or acceptable for the channel to be available only 'via satellite and iPlayer in the rest of the UK'

I have made this and similar points in previous submissions and fora and Ofcom and the BBC have not come up with a satisfactory response or rationale for not showing more Scotland originated content in and across the UK as a whole.

7.

Original Productions

The Agreement requires Ofcom to impose conditions setting out the level of original productions on each of the UK Public Television Services.

As part of our BCA, we propose that at least 75% of the BBC SC's output must consist of original productions.

The proposal that 75% must consist of original productions could prevent BBC Scotland from taking full advantage of the back catalogue and enabling and showcasing again examples of good programming from the past; programmes such as Culloden (1964) Dr Finlay's Casebook (1962-1971) Just Another Saturday (1975) Just a Boys Game' (1979) Monarch of the Glen (2000-2005) Scotch on the Rocks (1975) etc

If Ofcom wishes to support the new channel, it may well be it would be better to find ways of persuading the BBC to increase the budget per se.

Robert Beveridge 08/10/2018