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Scottish Broadcasting



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Constitution, Europe, External Affairs and Culture Committee

To consider and report on the following (and any additional matter added under Rule 6.1.5A)—

- (a) the Scottish Government's EU and external affairs policy;
- (b) policy in relation to the UK's exit from the EU;
- (c) the international activities of the Scottish Administration, including international development; and
- (d) any other matter falling within the responsibility of the Cabinet Secretary for the Constitution, External Affairs and Culture and any matter relating to intergovernmental relations within the responsibility of the Deputy First Minister.



CEEAC.committee@parliament.scot



0131 348 5971

Committee Membership



Convener
Clare Adamson
Scottish National Party



Deputy Convener
Jamie Halcro Johnston
Scottish Conservative
and Unionist Party



George Adam
Scottish National Party



Neil Bibby
Scottish Labour



Keith Brown
Scottish National Party



Patrick Harvie
Scottish Green Party



Stephen Kerr
Scottish Conservative
and Unionist Party

Introduction

1. This report details the findings of the Constitution, Europe, External Affairs and Culture Committee (“the Committee”) from our inquiry into [Scottish Broadcasting](#).
2. The report is set out in two parts and the aims of the inquiry were to—

Part 1

- examine the health of Scottish broadcasting
- assess the effects of consolidation and centralisation
- consider whether the current regulatory framework is fit for purpose
- examine the wider role of broadcasting

Part 2

- explore what the priorities for the BBC in Scotland should be
3. Part 2 will also inform our response to the UK Government’s [Britain’s Story: The Next Chapter - the BBC Royal Charter Review, Green Paper and public consultation](#) (“the Green Paper”) on the renewal of the BBC Charterⁱ in the context of the four themes identified in the Green paper—
 - a trusted institution
 - delivering services for the public good
 - driving growth across the UK
 - sustainable and fair funding¹
 4. During the inquiry we took evidence from [academics](#), [Ofcom](#), [BBC Scotland](#), the [Scottish Government](#), and those representing [news and journalism](#) and [production and skills](#), as well as receiving written submissions from a number of individuals and organisations.²
 5. The Committee thanks all those who provided the oral and written evidence that helped to inform our inquiry and the findings which follow.

ⁱ The Charter is the document setting out how the BBC is run, regulated and funded

Part 1

6. The first part of this report provides an overview of the evidence heard during the inquiry and the basis for – and many of the themes subsequently explored in – the second part, in which we consider the review of the BBC Charter. Our recommendations are directed variously at the Scottish Government, the UK Government, Ofcom, Screen Scotland and the BBC.


The Health of Scottish broadcasting

7. The issues covered in this section include: the transformation of the media landscape and issues facing the Public Service Broadcasters (“PSBs”);ⁱⁱ the migration away from linear viewing; domestic and global challenges; the relationship between broadcasting and production; impact on commissioning and freelancers; impact on different genres; growth in the production spend; the central role of the BBC and STV; news consumption moving online; the decline in advertising revenue; public interest journalism; the popularity of radio; and the Scottish Government’s priorities for the sector.
8. In the Transmission Critical: The future of Public Service Media report from July 2025, Ofcom described a media landscape “undergoing rapid transformation” as “global tech giants flood the market with an ever-growing range of content”, something that was “not unique to the UK”. This was proving “hugely popular with viewers and advertisers” as “algorithms, tailored recommendations and instant accessibility” were changing “how a growing number of audiences discover and consume media” – and with AI also “revolutionising how content is created, distributed and consumed”. The report stated—

” These seismic shifts are well underway and the next few years will be critical in determining the future of UK broadcasting.³

9. That report also highlighted a number of issues facing the PSBs—
- Audience Shift: Linear TV viewing has fallen below 40% of in-home viewing. Younger audiences spend far more time on YouTube and TikTok than on PSB services
 - Discoverability: PSB content is harder to find on third-party platforms, undermining universality and exposure to trusted news
 - Financial Pressures: Licence fee and advertising revenues have dropped significantly in real terms since 2016, while production costs have risen
 - Production Sector Impact: Reduced PSB commissioning budgets and reliance on international co-funding risk limiting UK-relevant content and affecting smaller producers

ii The PSBs are the BBC, Channel 3 broadcasters, Channel 4 and Channel 5. Given the shift away from linear broadcasting, these bodies are sometimes referred to as Public Service Media (“PSM”), encompassing the wider roles of these organisations online and through streaming services

- News and Trust: Online news consumption is growing, but trust in social media news is much lower than in PSB news. Misinformation and algorithm-driven polarisation are concerns
 - Technology Disruption: AI is reshaping content creation and distribution, raising issues around trust and copyright. ³
10. Ofcom told us that “audiences have never had it so good” with a “huge range of content to watch” at a time of their choosing “whether that is on their iPad in a hotel room or on the TV in their sitting room”. For broadcasters, however, “as the audience fragments, that creates a real challenge.” ⁴
 11. That challenge for broadcasters, particularly for the PSBs, was encapsulated by the growing trend of people watching less scheduled television and more of what the online platforms offer – whether Broadcaster Video on Demand (e.g., the iPlayer or STV Player), Subscription Video on Demand (e.g., Netflix) or Videosharing services (e.g., YouTube). As a consequence of this trend the PSBs were trying to serve two audiences simultaneously: those still watching in a live / linear / scheduled way, and others doing so via online platforms – the latter now outnumbering the former among younger people.ⁱⁱⁱ
 12. Glasgow University Media Group suggested that the broadcasting market in Scotland was facing “significant structural issues” from competing against global media platforms with “massive budgets with significant cross-media advertising campaigns” and able to share “content from all over the world”. The biggest challenge was in “capturing and holding audiences, especially young audiences.” ⁵
 13. Professor Happer said that with technology, changing audience habits and recent political events – such as the resignation of the BBC Director General – it raised the question of how the PSBs “tackle impartiality in a very different media landscape”. She observed a “rapidly evolving media landscape” in which the sector was devising strategies to address “structural challenges” that were being faced internationally but with “particular implications for Scotland”. ⁶ She told us “there are some successes” but—
 If I were to give an overview, it is a story of decline that needs urgent intervention. ⁶
 14. Screen Scotland underlined how “broadcasting and production are two sides of the same coin” i.e., that broadcasters require productions and producers require a market to sell their products. The production companies also needed a skilled workforce as well as locations and studio space. It was “an ecosystem...that has existed in Scotland to some extent for much of the last seventy years”. ⁷
 15. However, with the arrival of Netflix, Amazon Prime, Apple, Sony and others “now regularly active in Scotland”, the BBC and Channel 4 (the two publicly-owned PSBs) were “not the only source of production, but they remain the bedrock”. The

ⁱⁱⁱ [Tuning into YouTube: UK’s media habits revealed](#): Research by Ofcom found that less than half – 48% – of 16-24 year olds watched live TV each week in 2023, dropping from 76% in 2018, with most turning to platforms such as YouTube and TikTok

health of the sector was therefore “directly dependent” on the PSBs and their funding and focus “through their charters/licence, [and] Ofcom’s quotas”⁸ for commissioning new Scottish programmes.⁷

16. In the context of an “on-demand world in which we can choose what, when and where we consume”, aiming to “create more content that reflects people’s lives” and compete “with international streamers that produce dramas that in some cases rival blockbuster films”, the Director of BBC Scotland told us—

” The media and broadcast sector is in the middle of a period of change that is more rapid and transformative than anything that I have seen in my career.⁹

17. Acknowledging the pace and scale of change, she said “the sector is in really good shape”, the BBC was “investing more and more money in Scotland”, and the “challenge is to keep that going”.⁹

18. Professor Higgins said the “business models for all broadcasters” were being challenged by the decline in linear television and growth in online audiences, and the “lessening of commissions and the lowering of budgets”. There were also “questions of trust around the models of Ofcom and the production targets for outside the M25” and a “lack of transparency in data on how Scotland receives its share of the BBC revenues”. There was a “real opportunity” for the broadcasters to do better but it was a “tricky time” and—

” Overall, I would say that right now Scottish broadcasting is in a precarious state.⁶

19. In response to the changing landscape and cost pressures, PSBs have altered their commissioning practices. This has meant more focus on higher cost dramas and low-cost programmes, with fewer mid-market productions. Angus Dixon (Glasgow Caledonian University) explained that mid-market factual programmes (e.g., Location, Location, Location) were now too expensive to be met from current advertising and of limited appeal to global streamers.¹⁰ Glasgow University Media Group suggested that “not all genres are impacted to the same degree or in the same way” and “in entertainment and drama, increasing competition poses a major threat in respect of dwindling audiences for local content.”⁵

20. In May 2025, when the Committee was considering the impact of the decision to cancel River City, the Director of BBC Scotland described “an editorial decision based on changing viewing habits and on audiences moving away from long-running dramas to high impact, short-run drama series”.¹¹ Underscoring the cultural importance of being able to hear Scottish voices and regional accents in Scottish dramas, a member of the River City cast suggested that “Scottish accent in programmes are very quiet as it is” and warned of what we could lose without such shows.¹² The Producers Alliance for Cinema and Television (“PACT”) expressed concern that “ongoing structural changes” and the PSBs’ new commissioning strategy were leading to a “fewer, bigger, better” approach that would “have a substantial impact on the creative diversity of the sector”.¹³ Screen Scotland described how high-end television was “probably the healthiest that it has been in Scotland for 20 years” but that on the documentary (including arts, science and history) and unscripted side “demand has more or less collapsed across many

genres”.⁴

21. Peter Strachan (Glasgow Caledonian University) felt that the industry was suffering from a “commissioning crisis” with “risk aversion increasing as the impact of falling advertising and reductions in license fee income took a greater toll” and freelance jobs starting to “collapse from mid-2023”.¹⁴ The Broadcasting, Entertainment, Communications and Theatre Union (“BECTU”) stated that overall spend in Scotland had increased but “Scotland’s once vibrant unscripted sector continues to see a significant lack of commissions” with a “devastating effect on employment amongst the Freelance workforce.”¹⁵

22. Ofcom described “really positive elements” with “growth in successive years dating back to 2010”, the spend on external productions having risen over a 12- year period from £119 million to £225 million. Despite “inflationary pressures” and a “significant slowdown in production, not just in Scotland or the UK” there were “still wins to celebrate” in a “mixed production ecology”. A number of productions by the PSBs and streamers were mentioned, including Shetland (BBC Scotland), Coldwater (ITV), Summerwater (Channel 4) and Dept Q (Netflix)⁴ —

” We have local and global companies that see Scotland as a place where they can make high-quality programmes across the range of genres.⁴

23. In terms of Scottish broadcast news, the National Union of Journalists’ (“NUJ”) said that BBC Scotland and STV were the “key players” providing “diverse news coverage and quality local information”. Both faced the challenges of shifting consumer behaviour and issues around future funding but at a time of volatility and polarisation, “independent quality journalism is vital in maintaining dialogue, democracy and truth”.¹⁶ Glasgow University Media Group identified an appetite for news about Scotland among Scottish adults but noted that social media platforms did not themselves produce news content; and there was “increasing cannibalisation of broadcast content produced and paid for by the BBC, STV and other providers”. There was an increase in the popularity of social media news influencers but there was “no regulation in respect of the funding or practices of information gathering which influencers and other content producers engage in to report ‘news’”.⁵

24. Ofcom reported in July 2025 that online news consumption was now “significantly higher than linear broadcast TV channels” and that just over half of UK adults were using social media for their news.¹⁷ It also found that that the single biggest news source for Scottish adults in 2025 was Facebook (38%), followed by BBC1 (36%) and STV/ITV1 (35%).¹⁸

25. In October 2025 the Committee took evidence on STV’s plans to reduce its news footprint in Aberdeen,¹⁹ following up in January 2026 with Ofcom on the public consultation on those plans.²⁰ The wider issues arising from such developments are explored in the next section of this report. The NUJ viewed what was being proposed as “an act of cultural vandalism” for journalism in Scotland. It said the challenges faced by STV were “largely based around advertising”, as it was “competing for advertisers that now go to media that they would have perhaps not considered 10 years ago”, and so “looking to produce less news with fewer people

because it finds itself in a financial hole”.⁶ ITV Border told us the industry was “going through a rapid transformation” and “currently trying to work out how to be everywhere that we need to be”.⁶ Its priority was “to provide trustworthy, impartial and relevant and...in particular, regional and local” news whether the audience was on “TikTok or...on the website”.⁶

26. For print and online journalism there has been a significant decline in the advertising revenues of local newspapers. The Green Paper noted that “the sustainability of the local news environment is under threat, with a reduction of £2 billion in local and regional print classified advertising in under 20 years”.¹ The NUJ said the news media was “fundamentally centred on putting news where your audience is and finding funding to do so”, whether in broadcast or print and online journalism, and how that entailed “discussions around whether to include advertising, paywalls or subscription models” and “whether to put up the cover price of print editions”.⁶ Newsbrands Scotland said “media organisations are making as good a fist of it as they possibly can”⁶, The Herald having reached a “significant milestone” of 50,000 digital subscribers, with The Press and Journal and The Courier likewise and hoping to reach 75,000—

” Compared with the old circulation figures of the past...those figures feel small, but in this marketplace and digital landscape, it is a really important anchor for us to have such commitment from readers.⁶

27. The Scottish Government noted that last year Reach plc – which owns the Daily Record and other Scottish titles – “announced a proposed restructure for its editorial function, reducing journalists in Scotland and putting at risk coverage across Scotland”; and that PA Media “also announced proposed job cuts ...representing a reduction of about 8% of its UK editorial staff”. The “decline of public interest journalism” and a desire to strengthen local journalism had led to the Scottish Government’s support in establishing “the Scottish Public Interest Journalism Working Group”.²¹
28. With regard to radio, Ofcom said it was still “really popular in Scotland” with 87% of adults listening weekly and commercial radio “doing particularly well”. STV had launched STV Radio, “a nationwide digital offering that is part of the transformation that STV is committed to” and there were plans from Bauer Media “to move to and invest in a new studio for Clyde 1” in the centre of Glasgow.⁴ The regulator said broadcasters’ decisions “must be audience led” and “Global realised that it had made a wrong decision in...putting out network content that did not work for its audience, so it brought the Scottish content back”.⁴
29. In November 2025 BBC Scotland announced changes to Radio Scotland’s late night scheduling, including the Iain Anderson and Billy Sloan shows finishing. A media release set out BBC Scotland’s rationale²² and written submissions to the Committee’s inquiry from Stephen McAll²³ and the Tenementals were critical of those decisions; the latter suggesting they represented “a further retreat from having an engaged and active community of radio and music practitioners” and that “the move to diminish new music is a step in the wrong direction”.²⁴ The Committee previously took evidence from BBC Scotland regarding its radio output and digital-first agenda in March 2023 – focusing at that time on changes made to

its Jazz and piping music programmes²⁵ – and subsequently writing to the Director of BBC Scotland to highlight concerns about identifying, nurturing and promoting Scottish artists.^{26 27}

30. Addressing the general health of Scottish broadcasting, the Cabinet Secretary for Constitution, External Affairs and Culture (“the Cabinet Secretary”) said the situation was “significantly better” than it had been “in recent decades” but there were also “a number of things that should give us reason to seek to make change”.²⁸ He suggested that “approaching the point of the screen sector becoming a billion-pound annual industry” was “a success by any measure”. However—

” when one looks below that headline success, we can see that there are very different realities for different parts of the film and television sector.²⁸

31. The Scottish Government recognised the challenges of “technological change, market pressures and evolving audience behaviour” that were reshaping the sector; and said it would continue its work with Screen Scotland, the PSBs, Ofcom and others in the sector to “champion”—

- sustained funding for PSBs
- fair investment and representation for Scotland
- transparent and effective regulation
- stronger representation of Scotland’s interests in regulatory and governance structures
- sustainable, high-quality news provision, including local representation
- strong skills pipelines
- a broadcasting system that fully reflects the needs and interests of people across Scotland, including Gaelic language broadcasting.²¹

32. **At a time described by those who work in or with the sector as critical, seismic, devastating, transformative and in need of urgent intervention, the Committee asks the Scottish Government and Screen Scotland how they will be adapting their support for Scottish broadcasting – including the balance between high value and a wider range of productions, and plans to support mid-market factual programming.**

33. **We note that Screen Scotland’s Strategy to 2030-31²⁹ discusses both skills in the sector and screen education. The Committee believes that Screen Scotland should maintain its focus on supporting skills development and the career progression of screen workers; and we ask for details on how it is measuring outcomes in this respect. The Scottish Government should also play a role in supporting Screen Scotland’s strategy and ensuring that courses in further and higher education are available for those seeking**

careers in the sector. The Committee believes that this will require joint working between Screen Scotland and the Scottish Government.

34. **We acknowledge the Scottish Government’s letter of 11 March 2026³⁰ updating us on the Scottish Public Interest Journalism Institute (now Initiative) – which was a key recommendation of the Public Interest Journalism Working Group – and ask that our successor committee be kept informed of the progress of that work, and in particular how it can support the resilience and sustainability of the sector and promote media literacy.**

Effects of consolidation and centralisation

35. Recent developments across the broadcasting sector, from the BBC and STV to Scotland’s commercial radio networks – and in particular the direction of travel away from linear and toward digital delivery (reflecting changing consumer habits) and a pattern of consolidation and centralisation – have highlighted the issues covered below, including: impact on local content and cultural identity; economies of scale; STV’s plans to change its regional news programming; constraints on BBC spending and production; umbrella ownership; structural changes; the hollowing out of the middle; AI’s impact; the sustainability of domestic production; commissioner location; the importance of intellectual property (“IP”); and the balance of spend between the PSBs and inward investment.
36. In 2024 Ofcom undertook a review of local media in the UK, the purpose of which was to examine the “provision, role and value of local media in the UK, including how providers are adapting to changing audience behaviours”. It found that “local media has a vital role to play in the social fabric of the UK” and “people recognise the potential civic benefits local media can deliver” but that they also “tend to place greater personal value on the immediate, tangible benefits of day-to-day news and information, such as traffic and weather.”³¹
37. ITV Border told us that being part of ITV and taking a cross-regional approach provided an “an economy of scale” allowing it to benefit from the work of teams specialising in social media.⁶ A move away from “more legacy” work enabled it to focus on the website, streaming and social media.⁶ In terms of the perception that national broadcasters could be London-centric in their outlook, the suggestion was, with a view from the south of Scotland, “things can sometimes feel a little central belt-centric”.⁶
38. Newsbrands Scotland said of STV’s plans to change its regional programming commitments that the broadcaster was facing “a difficult situation” but that “no news and media organisation does not face hard choices”.⁶ BECTU labelled it as a “downgrading of STV’s news output”.⁴ The NUJ warned of “significant danger” that the changes, if agreed by Ofcom, could “create a dangerous precedent to allow other channel 3 licences to also reduce their news coverage”.¹⁶

39. Ofcom emphasised the importance of local news and said “Scotland will continue to receive high-quality regional news” with STV able “to move towards...a content-led newsroom, rather than one that is built around the supremacy of the 6 o’clock news”. The audience would “not get as many minutes of a linear programme...tailored to them” but the number of people watching was “going down and down”⁴ and STV would become “digital first or platform neutral” like other newsrooms. The “crucial part...more so than where the programme comes from, is where the news-gathering resources are” and that “the stories are being gathered in the areas that are being served”.⁴ STV had “committed to continuing to have journalists on the ground in Inverness, Aberdeen and Dundee”.⁴
40. The regulator also said that “making a television package” might involve a reporter, a camera person, and an editor, perhaps with some overlap in these roles, as well as “the technical infrastructure for the linear feed”; whereas “somebody who is uploading a story on TikTok can do all that themselves more efficiently”. Ultimately “more content can be delivered with fewer people if more of it is done on digital.”⁴
41. With reporting of ITV’s possible take-over by Sky/Comcast,³² and what that might mean for STV in the future, Professor Beveridge did “not want STV to be taken over by anybody unless there is full agreement by the Scottish Parliament and the Scottish Government”.⁶ His submission said “cultural industries are more than economic entities” and—
- ” we need to have media policies which, as much as possible, enable us to tell our own stories rather than having them imposed upon us from the outside.”³³
42. Ofcom saw a “need to be realistic in recognising that STV is not alone in having to make difficult decisions” and looking “how to...thrive, rather than just survive”. Citing ITV’s talks with Sky, it suggested that we were “likely to see more of that kind of consolidation in the future” as “even the biggest global players are having to adapt”.⁴ Referencing “news plurality” at the network and regional levels as provided by the PSBs and likes of Sky News—
- ” We recognise the need for that provision to change as audience habits around news evolve, and we recognise the growing importance of having that trusted and accurate news content in digital spaces.”⁴
43. The NUJ recognised there was “an argument that the survivability of public service broadcasting can come only within a larger organisation”.⁶ However, it gave the example of Ulster Television, which had gone from an independent regional broadcaster to a subsidiary of ITV, and said if STV became “part of an ITV empire that is owned by an organisation outside the UK” there would be “trepidation”; the union’s “experience in the newspaper industry” being that “the further away the management sit from Scotland, the worse the decisions they make about the coverage of local journalism”.⁶ Newsbrands Scotland described “growing pressure to find content that costs less” and “share as much content as possible” which was resulting in “less news about Stirling in the Stirling Observer”.⁶
44. BECTU referred to “significant challenges” facing the BBC over charter renewal after “many years of cuts and poor licence fee settlements, and on-going, year-on-

year redundancies”.⁴ It said “a realistic licence fee settlement” was needed “because BBC Scotland has lost a lot of capacity for programme making” in recent years and much that was “attributed to BBC Scotland is commissioned through BBC Studios...a UK-wide subsidiary”.⁴ The “out-of-London funding” commitments for commissioning did though provide “some optimism”.

45. Screen Scotland suggested that “if you want to make factual TV now, you have to focus on either air fryers or murder – in other words, you can do consumer products or serious crime” and “the line between factual entertainment and documentaries” was being blurred.⁴ It emphasised the value of independent production, with “a number of funds that are targeted directly at its ability to win new business”, but the question was “whether there is a market for that business”.⁴ Constraints on the BBC’s spending “impacts our competitiveness and...our companies’ sustainability” and—

” We would always argue for the BBC to be well funded, but we would also argue for a BBC that then spends that money evenly and equitably across all four home nations.⁴

46. BBC Scotland itself described “a huge amount of consolidation in the market” with more “umbrella ownership” and companies “forming more partnerships to meet the budget requirements of modern television”. This was “reducing the number of commissions that they give to the Scottish sector or withdrawing coverage” and demonstrated “how vital our work is to support the sector, train for the future and serve audiences across the country”.⁹ PACT said that “delicate structural changes” with the PSBs, arising from “reduced ad spend and a declining BBC licence fee [income in real terms]”, meant the broadcasters were “having to pivot towards different commissioning strategies” which was resulting in “fewer but bigger, better commissions”. Those returning series were “running away from us as an industry” and “the middle is being hollowed out”.⁴

47. On the greater use of AI in journalism, Newsbrands Scotland saw “a means of producing news quicker” and a useful way of producing “large numbers of small stories about planning applications and routine things”. This could “provide good public information” thereby “freeing up journalists to do journalism” and publishers “would be remiss” not to consider such opportunities so long as “human intervention was an essential part of the process”.⁶ The NUJ was sceptical of the idea that AI might free up journalists to do other things, arguing that it could provide cheaper content but was “also more dangerous” when, for example, there was no awareness of reporting restrictions in court cases. Basically “all that it can do is summarise what someone else has written”. There was also criticism of a rewriting tool that could take a story from one local paper and edit it in the house style of another so as “to thwart the Google algorithm”. Such an approach was being taken “rather than invest in quality journalism”⁶ and fundamentally—

” there must be a journalist looking at the copy and taking responsibility for it.⁶

48. Among PACT’s members from the “screen cluster” in Glasgow, most worked in the “unscripted genre” and were experiencing “a torrid time”. Public service broadcasting was described as “the linchpin of the commissioning opportunities that they have enjoyed over many decades” and “the incredible inward investment that

we are getting” linked to the sustainability of domestic production.⁴ Peter Strachan argued that the current system “fails Scotland’s freelancers” and allowed for productions which employ relatively few Scottish-based freelancers to be considered Scottish under Ofcom’s rules. In particular he cited a lack of roles for Scottish producers, writers and directors.¹⁴

49. The Cabinet Secretary noted how the influence of the streamers and the trend for bigger scale production had “squeezed the work that is available to independent producers”. This was “not just a Scottish or even a UK phenomenon” and he highlighted the importance of Scotland-based commissioning so the decision makers were aware of “independent producers in Scotland who can produce fantastic products”.²⁸ The location of commissioners was also raised in several written submissions. In relation to the BBC, Screen Scotland contended that “creative origination from within Scotland is best achieved by BBC commissioners for the BBC network who live and work in Scotland”.⁷ Angus Dixon suggested there was a “perception by commissioners that regional talent wasn’t sufficiently skilled” and the criticism in the other direction was that “it was a lot more to do with informal relationships...than objective levels of skill”.¹⁰ PACT was “broadly supportive of moving decision making to the nations and regions” but wanted “the commissioning process and how the BBC works with producers [to be] as simple as possible” and so avoid “longer decision-making timelines, more sets of notes from multiple commissioners and potentially fragmented relationships.”¹³

50. Regarding production quotas, in the general sense of who does what and where, Screen Scotland said that it was “not so much about where these things are filmed” but “where the intellectual property is owned” and the location of “the backroom office jobs...the lawyers, the accountants, the heads of human resources” and—

” If those jobs are based within Scotland-based production companies that win that Scottish-qualifying output, more people will tend to be employed locally.⁴

51. It was also suggested by Screen Scotland that broadcasting had reached “a plateau in the Scottish economy” with spend “roughly 50:50 between the public service broadcasters and inward investment productions”, having “been fairly static since the pandemic boost”. However, “audience consumption patterns are continuing to change”, with the “YouTubification of television or the televisionification of YouTube” set to continue and a sense that “the element of viewing that is dedicated to the public service broadcasters will continue to reduce over time”.⁴

52. We return to the question of Ofcom’s regional production quotas and what qualifies as Scottish in the following section and again in part 2 of the report (see paragraph 187 in particular).

53. The Committee notes the findings of Ofcom’s 2024 review of local media, including the vital role that local broadcasters play in the social fabric of all parts of the UK. People recognise the civic benefits that local media can deliver and value the availability of day-to-day news and information, be that traffic reports, weather updates or coverage of local sporting events.

The local connection brings trust, a sense of authenticity, and social connection. A crucial part of all this, as acknowledged by Ofcom, is where news-gathering resources are based. We are concerned by any downgrading in local news output within Scotland and – in addition to encouraging Ofcom to be vigilant of any such developments – we ask the regulator to set out how it will use its powers to mitigate the risks arising from centralisation and consolidation, reduced regional coverage and weakened local news provision. We also seek its views on the best approach to addressing concerns about news provision that is perceived to be London-centric or overly focused on the concerns of the central belt.

Current regulatory framework

54. The following section covers: the role of the regulator; its workplan; changing audience habits; the provision of news reflecting those changes; the question of what regulation is for; Ofcom’s track record; a review of PSB regulation; discoverability of PSB content; the public interest versus consumer interest; AI and copyright; regional production quotas; and the Scottish Government’s support for a review of the quota framework.
55. Ofcom plays a key role in the sector, including setting quotas for productions made out of London and the criteria for determining what counts as Scottish. It also undertakes and publishes research on the sector, and provides advice to the UK Government’s Department for Digital, Culture, Media and Sport (“DCMS”). The UK Government also consults with the regulator as part of the BBC Charter renewal process.
56. In its Proposed Plan of Work for 2026/27, under “the theme of Media we Trust and Value”, the regulator set out the following outcomes—
 - Audiences can find and access a wide range of content, including public service media (PSM) content that is produced across the UK and reflects its diversity
 - Audiences can find and access a plurality of news that is duly accurate, duly impartial and trusted
 - Media providers compete fairly and openly for audiences
 - Audiences are protected from harm, and freedom of expression is safeguarded
 - Ofcom is already implementing the Media Act which provides critical support for the PSBs, in particular through giving them greater flexibility to meet their obligations across their linear and online services and making their on-demand players prominent on connected TVs. We [Ofcom] will also continue to publish our annual Media Nations: Scotland report to give an overview of both audience and industry trends across the broadcasting sector³⁴
57. Ofcom recognised that with audiences becoming “more diverse in their preferences

and where they consume content” both itself and the PSBs had to adapt. Priorities from its PSM Review included “ensuring prominence and discoverability for PSM content on third-party platforms” and “testing new ways of distributing and creating content”.³⁴ It told the Committee—

” the most important thing...is the changing behaviour of audiences. When regulating, we cannot pretend that audiences are still consuming content in the same way as they were 20 years ago. That is the biggest challenge.⁴

58. Audiences were “well served with content at a network level” but Ofcom acknowledged “the need for that provision to change as audience habits around news evolve” and “the growing importance of having that trusted and accurate news content in digital spaces”.⁴ The PSBs were “struggling with financial sustainability right across the board from BBC to Channel 4, ITV and STV” and the regulator wanted “to make sure that STV not only survives but that it thrives” and was able to “deliver the news...where people are consuming it”.⁴ It said “regulation should not stifle innovation or prevent broadcasters from adapting” but rather “support them so that they can continue to serve audiences in this increasingly challenging and constantly evolving environment”.⁴
59. Acknowledging the importance of regulation, which “should absolutely be there”, ITV Border said that this was “about asking what the regulation is for” and how unlikely it was that “any business would simply retain jobs and never change and never modernise”.⁶
60. Regarding its track record for broadcasters seeking changes in the conditions for their licences and being refused, Ofcom cited instances when the BBC had been declined requests, saying “we do push back”. It had asked that STV “adapted the idea”, the original proposal to change its regional programming commitments having been “far from what is being proposed now”. Whilst acknowledging that the STV North licence was its responsibility, Ofcom said that it was “not for the regulator to tell any public service broadcaster how to spend its money” and “regulation needs to enable STV to flex itself”.⁴ It also told us that “STV will still have licence obligations for delivery placed on it and it will have to report against them” and “it is important—and this is STV’s responsibility—that high-quality local journalism is still kept on the programme”. It said “we take each licence variation separately and give it equal scrutiny”.⁴
61. Ofcom had “called for a review of regulation” in its PSB sector report and was consulting on what should change, some of which “would be within our gift” and other aspects “would require legislative change”. It recently published “proposals on the prominence of social media on smart TVs”, informed by the Media Act 2024, which – were they to proceed – “would guarantee for the first time that when you turn on your Samsung telly or whatever it is...public service broadcasting apps to be on the first rail that you land at”. There were ongoing discussions with DCMS and others “about what such prominence on YouTube would look like”. The regulator said that it did not have “all the answers” but the question was—
- ” Social media is becoming prominent on smart TVs, but how do we get good-quality, trusted and regulated news to be prominent in the soup—if you like—of the internet?⁴

62. The NUJ also highlighted that “Ofcom made sure that public service broadcasting was prominent” and not being “put behind the streaming services” on digital televisions. ⁶
63. It was important to ensure “that good-quality, trusted and regulated content” from the PSBs was “discoverable” and Ofcom allied this point to an emphasis on “media literacy or...critical thinking and digital citizenship”. This was “about knowing the difference between the slop and the good stuff” and Ofcom’s research suggested that “if you ask young people how they verify what they see on TikTok” they tell you “I’ll go check it out on the BBC or STV”. ⁴
64. Professor Beveridge suggested that “Ofcom really needs to take more account of the citizen interest and not just the consumer interest”.¹⁰⁸ In setting out his opposition to the proposed changes to STV’s regional programming, he said “Ofcom should be encouraged to pay more explicit attention to its duty under the Communications Act (2003) to secure the public interest in communications matters”. ⁶ He added that the regulator should have “at least two members representing Scotland” on its board; his sense being that “the nations and regions are kind of an afterthought” in Ofcom’s “overall decision making”. ⁶
65. Newsbrands Scotland said that “if the regulators maintain a technology-neutral stance, it is about the content. Is the content correct? Is it compliant or not?” There was something akin to a gold rush over AI and data and therefore “a risk that we will throw out a lot of good stuff” in the process. The upside was “that we are in quite a good place” in terms of the copyright regime. ⁶
66. The NUJ’s concern was that “AI models are being fed industrial quantities of books, photographs, images and video” and this was “happening on an almost inconceivable scale”. ⁶ The suggestion that “existing copyright law” would address that “huge commercial impact” and “any of that money would come back to creators through the current route is very difficult”. It said “certain laws such as defamation are platform and individual neutral” but in terms of news production—
- ” At what point does Ofcom extend its regulation to other people appearing beside the BBC on different platforms and so on? ⁶
67. A key issue arising from the Committee’s inquiry was the regional production quotas for the PSBs. These are set by Ofcom and PACT suggested were crucial in helping “to move PSB commissioning spend to the UK’s nations and regions and contributed to the growth of local production hubs”. Previously London and the south east dominated TV commissioning but that “share of commissioning spend has been steadily decreasing” from 66% in 2017 to 52% in 2024. PACT welcomed the fact that both the BBC and Channel 4 had strategies to grow production outside of the south east and it suggested the quotas should be a minimum for PSBs. ¹³
68. Screen Scotland wanted more consideration of “how Ofcom’s quotas operate to deliver outcomes” and had “long-standing concerns” about how projects are currently judged to be Scottish. This was an “inherent problem” and its view was that “a Scottish production company is one that has been formed in Scotland and is managed and controlled in Scotland”. That was “separate from its ownership” and it gave the example of a company that was “an international group, but it remains

very much a Glasgow-focused, Glasgow-based production company”.⁴

69. The suggestion was for “a process whereby the BBC, Channel 4 and, ideally, the channel 3 licensees are required to spend a proportional share of their production expenditure—their commissioning budgets—in Scotland” and this would be “roughly connected to population share” as “a minimum” and “exceeded where possible”.⁴ Beyond that, and to promote skills and employment and be able to “attract the bigger productions from outside the UK”, it was Screen Scotland’s view that—

” there could be a requirement that the balance of that commissioning—the productions that qualify as Scottish—should be from Scottish-formed, Scottish-managed and Scottish-operated businesses, because that drives IP ownership and long-term value.⁴

70. Screen Scotland further suggested that productions commissioned from elsewhere “should only qualify as Scottish when they meet the Ofcom 70% production spend criteria in Scotland, employing Scotland-based talent, crew and facilities”. It recognised the value of “a mixed approach that allows for both types of sourcing for ‘Scottish qualifying’ programmes” and also argued for “the relocation of complete genres’ commissioning teams from London to Scotland under the new Charter”.⁷

71. A number of written submissions to the inquiry highlighted the case of the Traitors which was considered a Scottish production under Ofcom’s rules, based on having a substantive base in Glasgow. Professor Higgins suggested there had been a “failure to meaningfully employ Scottish crew” and that this undermined the intent of such quotas.³⁵

72. Ofcom was aware that “some stakeholders would like to see changes to our regional production guidance” to create “a more prescriptive regime”. It suggested the current criteria were “designed to support a mixed ecology and the benefits this can provide to both homegrown producers and the wider creative economy of Scotland”. Its view was that “any such changes would threaten these benefits, risk growth, and increase the regulatory burden on both production companies and PSBs”. It referenced PACT’s concern that this could “stifle innovation”. Though not intending to review the guidance “or the related quotas”, Ofcom said it would continue to engage “to ensure our regulation remains relevant in a fast-moving environment” and invited submissions to its current Review of Broadcast Regulation.³⁴

73. The Scottish Government shared concerns highlighted in research commissioned by Screen Scotland that “a high proportion of programmes counted as ‘Scottish qualifying’ were commissioned from companies headquartered outside Scotland” and use of “substantive bases” in Scotland resulted in “limited long-term economic or creative benefit”. The same research suggested that “Channel 4’s commissioning model has delivered greater value and more genuine Scottish origination than the BBC’s network approach in recent years”.²¹

74. However, while the Scottish Government welcomed Channel 4’s “plans to further invest in skills development across the UK”, it was “disappointed with the decision on the Made Outside England quotas for Channel 4’s latest licence” which it believed “should fairly reflect the populations of the nations, and the size and growth potential of their creative industries”. It echoed Ofcom’s view that the

broadcaster “needs to do more to improve representation, including by commissioning programmes set in the nations that authentically portray the lives of different communities within them” and suggested that “quotas play a vital role in achieving those aims”.²¹

75. Overall, the Scottish Government supported a review of the quota framework that could deliver—
- better alignment between quotas and genuine economic impact
 - stronger incentives for commissioning from Scottish-founded and Scottish-led companies
 - improved retention of intellectual property
 - greater transparency over how quotas are met
76. The Cabinet Secretary wanted to see “more robust regulation by Ofcom”,²⁸ the view being that the “spirit of production quotas should be fully embraced, to ensure a strong, sustainable future for broadcasting in Scotland”.²¹ His sense was that in terms of both screen commissioning and PSB news obligations²⁸ the regulator “wants to play a key role but does not make full use of the powers at its disposal” and—
- ” I think that Ofcom intends to do right, but I am not entirely sure why it is reluctant to be more decisive, because it should be.²⁸

77. **Ofcom intends for audiences to be able to find and access a wide range of content, including public service media, produced across the UK and reflecting its diversity. It is aware of the rapidly changing behaviour of those audiences and says it does not wish to stifle broadcasters’ innovation but to support them to serve audiences in this challenging environment. Questioned by the Committee on its track record as regulator, Ofcom said that there were instances when it had declined requests from broadcasters to amend their licences. We note that it has also called for a review of how the Public Service Broadcasters are regulated and we would wish to see a more robust approach as the outcome of that review in terms of both exercising its existing powers and with any additional powers that might require a legislative underpinning. The Committee’s view is that Ofcom should not be inhibited in making full use of the tools at its disposal. Its focus on recognising the need for broadcasters to adapt comes with a risk of overlooking the public interest in terms of local news or those aspects of Public Service Broadcasting that are less about audience ratings and more about diversity of voice and place. The point being that people wish to see their lives reflected in what they watch or listen to. We encourage Ofcom to give due weight to these considerations in all its decision making and ask for examples of how it has done so in recent decisions about PSB licences.**

78. **The Committee considers that the current framework of media regulation was designed for an era in which PSBs were far more dominant forces in the media landscape, and that developments such as the proliferation of platforms, the merging of traditional and social media, and the emerging implications of generative AI, will require a new approach to media regulation.**

79. **We return to the issue of Ofcom’s regional production quotas in part 2 of the report under the section Driving growth across the UK and the subheading Scottish production (see paragraph 187 in particular).**

The wider role of broadcasting

80. The issues covered in this section include: the threat to public service media; Ofcom’s six recommendations; PSBs as a “cultural health service”; storytelling for different audiences; the BBC’s “honest broker” role; the Local Democracy Reporting (“LDR”) Service;³⁶ differences with the global steamers; a focus on economic growth, creative origination and developing the audience; concerns around fair work and health-and-safety; ITV Border’s experience of coving news for parts of Scotland and the North of England; and the Scottish Government’s views on the performance of network news in reflecting the devolved landscape, and the indispensable role of PSBs.

81. The University of Glasgow’s Centre for Cultural Policy Research (“CCPR”) said the UK was “home to a unique and diverse system of Public Service Media” which had been serving audiences and supporting the creative economy. However, that was “now under threat due to a changing economic and competitive media landscape, new audience habits and concerns about PSM funding mechanisms”.³⁷ Expectations of PSBs had evolved and while the Reithian values of ‘to inform, educate and entertain’ remained, there was now a greater focus on “nurturing creative talent” and “promoting regional and independent content production”. They were considered to be a “key national infrastructural asset” and played a role in “underpinning culture” and “supporting informed public discourse”. Serving a global as well as a domestic market, the PSBs were “an essential pillar of the creative economy” for both Scotland and the UK.³⁷

82. Ofcom’s 2025 Transmission Critical report described Public Service Media (“PSM”) as being “under threat” and made six recommendations—

- Prominence and discoverability for PSM content on the third-party platforms that audiences increasingly turn to. This can be achieved by a range of measures, such as action by the PSBs themselves working with those platforms and/or regulatory action
- Stable and adequate funding to sustain a broad range of PSM content
- Urgent clarity on how TV will be distributed in the future

- More ambitious partnerships amongst the PSBs
 - Investment in media literacy is vital for everyone’s ability to use digital services and to understand and critically engage with news and content
 - Streamlined regulation which strips away any outdated unnecessary restrictions.³
83. Professor Beveridge made the case for “a huge public education programme” to show that public service broadcasting was “a cultural health service” and the benefits of “getting information that at least aspires to accuracy, impartiality and balance even if [the BBC] it does not always achieve it”. He said this was “absolutely central to the future of a democracy”.⁶ Professor Happer described STV’s strategy as “a kind of internationalisation” but local media news played “a very important role in our democracies and cannot be thought of in that way”. She suggested it was “also about building trust—the local connection is a key aspect of that” and—
- ” It is way beyond the issue of achieving high audience numbers. It is a much bigger question and much more important.⁶
84. Ofcom’s recent review found that the PSBs “remain the most trusted sources of news”.⁴ Trust in a broadcaster was about more than its credibility, however, and BECTU told us it was “crucial for the culture and democracy of Scotland that we have a strong, independent, impartial BBC that is free from political interference”.⁴ Freedom from political interference was a theme highlighted by a number of the written submissions. The NUJ said “the BBC has to produce quality news and still get it out there fast” and the checks that it has to make means it will “always be slower” than social media.⁶ However, “any link to a story that has a BBC web address or is on a BBC app brings with it the implication that it is trustworthy” and—
- ” The BBC owns the platform of channel 1 in the same way that ITV and STV own the platform of channel 3, and a lot of credibility comes from a news organisation having such infrastructure.⁶
85. BBC Scotland told us “big hits are not the only game in town” and lots of programmes were commissioned “because we think that they serve a particular purpose or will hit a particular audience”. It would continue to do that on the basis “we are not commercial, we are a public service broadcaster”.⁹
86. PACT said “everyone wants to see their lives reflected in the content that they watch”, that this was “the key thing about public service broadcasting” and “the most important thing is to sustain it”. The PSBs should “create storytelling that resonates with different age groups” and “that might involve going to where audiences are”.⁴ BECTU said it was “too easy for kids and younger people to accept what they see if they do not have the knowledge that not everything out there is the truth” and commended Finland’s educational approach of having “classes on fake news and social media awareness”.⁴
87. Radio Scotland “should not be trying to be a commercial radio station” according to

Professor Higgins because it was “one of the few platforms on which such [Scottish] music gets out to the world”. He said BBC Scotland “does not do enough to flag the quality that it has” and “the great lesson from *The Traitors*” was that it was being watched by young people after “being promoted on TikTok and across a variety of social media”. It was “about people playing this game better” in terms of marketing and changing “the diversity of what it puts on the screen and the radio”.⁶ It was also “important to see things as an ecosystem” and the BBC was not “just one institution that looks after its own affairs” but had “cultural relations across everything that we do in Scotland”; and “that needs to be reflected far more clearly in its remit and...its programming”.⁶

88. Professor Beveridge suggested that with shifting “patterns of news consumption and changing technologies” and the UK being “a very small player in the global marketplace”, the Scottish and UK parliaments and governments should “start regulating and planning for a better infrastructure to support the values and practice of public service broadcasting”.⁶

89. Describing the BBC as last century’s media “hegemon”, Professor Happer said there was “a more open democratic space” in the early years of the internet.⁶ However, “corporate capture” had been a feature of the last five years, with “the very worst of the worst rising to the top”. This meant that though the BBC did not “set the agenda as it once did”, it was “becoming ever more important” and “instead of being reactive” it should be “proactive in producing the best and most accurate account of information”. People had “to believe that news is serving their interests” and we needed “education on one side and regulation on the other”.⁶

90. The BBC “enters into our children’s lives through BBC Bitesize” but Professor Higgins suggested it ought to “go even further into the curriculum” and at “each opportunity arising from young people’s educational journey” that it “should be present as the honest broker”. He said it must be held to account “when it makes mistakes” but “nobody else plays that role” and—

” It cannot capitulate and become the same as the commercial operators, because that is not its remit, and neither should it be.⁶

91. Newsbrands Scotland said it was difficult “to build a quality subscription-based service” to compete with “a quality news service available free of charge”. Ofcom had “recognised for the first time that the BBC is part of the headwind that publishers face” but there was a need to address “what the limits of its remit should be” in respect of serving the audience and honouring its licence fee “but without distorting the commercial markets”.⁶

92. The BBC-funded and UK-wide LDR Service was “broadly supported among local news providers”¹ according to the Green Paper. It was described by Newsbrands Scotland as having had “teething problems” but was now a “situation in which we happily co-exist”; and able to provide “a guarantee of coverage of local council affairs that would not necessarily be there if the LDR system did not exist”.⁶ BBC Scotland said there was generally “one local democracy reporter for every two local authorities across the UK” but “in Scotland, partly because of the geography, we upped the investment from the average and there are about 21 for the 32 local authorities”.⁹ The NUJ said the service “does an excellent job” and “puts journalists

in places where commercial interests would not be” but was critical that the money was “taken off the top of the funding for the BBC”.⁶

93. Screen Scotland said the PSB market was distinct from “the big international platform market” which – unlike the BBC and Channel 4 – had “no political imperative to do anything in Scotland” and came here for the “network of studios and fantastic crews” and “great diverse built and natural environment”, which provided “a positive environment in which to work”.⁴ There were three elements that Screen Scotland looked for from PSBs: the “contribution to...economic growth in Scotland”; “creative origination from within Scotland”; and “developing the audience for content from Scotland”. The idea of “just getting the BBC through charter renewal is not enough” when there was “an opportunity to ask to what end we are doing this, and what outcomes we seek”.⁴
94. Included among the BBC’s public purposes was “contributing to the creative economies of all parts of the UK”. During the last 10 years there had been “location filming and elements of production taking place in Scotland on projects that qualify as Scottish”; but Screen Scotland wanted “to see much more creative origination from within Scotland, which concerns issues of representation and diversity of voice”⁴ and—
- ” It is really important that we have a strong public service broadcasting sector in the UK, and it is really important that we have a very strong BBC. It is a vital element of our whole economy.⁴
95. Concerns around fair work and adherence to the Scottish Government’s policies were raised by BECTU, suggesting that “the industry in Scotland is miles behind other sectors”⁴, a view shared by Equity and the Musicians Union.⁴ Screen Scotland said “every opportunity that we deliver has to be fair work compliant”.⁴ BECTU saw a “need to change the culture” of long hours and consecutive days without a break, something that “needs to be imposed and impressed on the industry” rather than accepting a response of “That’s the way the industry is” from producers. There were “one or two green shoots” with “some companies” showing the way and the BBC was considering “piloting a couple of shows based on shorter working hours”.⁴ Dr Kelly highlighted a concern over the level and quality of safety training in the sector. She suggested: embedding safety training in skills development schemes and formal screen education; investing in “immersive simulations and actor-led scenarios”; and ensuring that public funding is tied to productions being able to “demonstrate robust safety culture and protocols”.³⁸
96. A criticism directed at the BBC in the context of devolution is that its network news does not always adequately reflect the different nations’ policy and political differences. ITV Border covers parts of Scotland and the North of England and its Managing Editor said the issue was “thrown into sharp focus during the Covid-19 pandemic” when lockdown rules diverged. The broadcaster was used to catering for both audiences and said “it is not very difficult to do.”⁶
97. The Scottish Government expressed concerns about “the performance of UK network public service news services” which in its assessment continued “to fall short in adequately and accurately reflecting the devolved landscape of the UK”. It accepted there had been “improvements over time in some aspects” but considered

this to be insufficient in addressing “the structural and recurring shortcomings that persist in UK network coverage”. Examples included “misleading use of terms such as ‘the NHS’ or ‘the Government’ when the institutions being referred to apply only to England or to reserved UK-wide matters”. It also identified “a consistent tendency to frame devolved Scottish policy developments primarily through their perceived implications for the UK Government” as opposed to issues of importance in themselves. In terms of the obligation to provide “trusted and accurate news” for all the UK’s nations and regions—

” These duties must be interpreted meaningfully, with proper understanding of devolved responsibilities, ensuring that coverage accurately reflects each part of the UK. ²¹

98. Recognising the wider significance of the broadcasting landscape in Scotland, the Cabinet Secretary told us that this was “not only central to our democracy and cultural identity” but a “major driver of our creative economy” and—

” PSBs play an indispensable role in sustaining jobs, supporting independent production companies, investing in skills and projecting Scotland’s culture, languages and talent to audiences at home and globally. ²⁸

99. **The Committee recognises the pressures Public Service Broadcasters are currently facing and the invaluable “cultural health service” that they provide. As Ofcom’s Transmission Critical report sets out, they are universally available, required to deliver trusted (and local) news, and make a breadth of high-quality programmes for UK audiences and beyond. As well as holding governments and others to account and keeping the public informed, they also help bring the county together with their coverage of sporting and cultural events. As suggested in the Green Paper regarding the BBC but which could also apply to the PSBs as a whole – “If it did not already exist, we would have to invent it”.**

100. **We highlight the six recommendations made by the regulator in its Transmission Critical report (see paragraph 82) and in particular those we cover in more depth in part 2 of the report: stable and adequate funding (see paragraph 219); urgent clarity on how television will be distributed in future (see paragraph 166); and more ambitious partnerships amongst the Public Service Broadcasters (see paragraph 197).**

101. **We also further consider the question of the BBC’s performance in reflecting the devolved landscape in part 2 of the report under the News provision heading (see in particular paragraphs 127, 128 and 129).**

Part 2

Priorities for the BBC in Scotland

102. The future of the BBC in Scotland (and the UK) was a recurring issue in the Committee's inquiry. This second part of the report is the basis of our submission to the Green Paper and sets out the Committee's findings under the themes from that consultation.¹

Background: Mission, Charter and Green Paper

103. This section covers: the BBC's mission; the purposes set out in the current BBC Charter; the central role played by the BBC in national life; BBC Scotland's three key goals for the new Charter; Glasgow University Media Group's five priorities for the BBC in Scotland; and the four headings from the Green Paper under which this second part of the Committee's report is structured.

104. The BBC's mission is "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".³⁹

105. The current Charter sets out its five public purposes—

- to provide impartial news and information to help people understand and engage with the world around them
- to support learning for people of all ages
- to show the most creative, highest quality and distinctive output and services
- to reflect, represent and serve the diverse communities of all the United Kingdom's nations and regions and, in doing so, to support the creative economy across the United Kingdom
- to reflect the United Kingdom, its culture and values to the world³⁹

106. The introduction to the Green Paper states that the BBC "is not just a broadcaster – it is a national institution that belongs to all of us", one which "has been at the centre of our democratic and cultural life for over a century" and that "if it did not already exist, we would have to invent it".¹

107. The Director of BBC Scotland told us that audience surveys showed that "in addition to independence from governments" viewers wanted "high-quality entertainment, drama and comedy, as well as programmes that educate and inform" and—

” They want to see themselves and their lives reflected in the programmes that we make. We ask for the flexibility to respond and change as quickly as our commercial rivals and for the long-term sustainable funding that will enable us to do that.⁹

108. BBC Scotland’s written submission to the inquiry outlined that “the Charter must deliver on three key goals”—
- 1) Independent: Safeguard the BBC’s independence in the interests of the public
 - 2) Sustainable: Ensure the BBC is sustainable as a universal public service for the long term
 - 3) Responsive: Enable the BBC to meet changing audience needs with speed and agility ⁴⁰
109. Against the backdrop of “a challenging global media landscape”, Glasgow University Media Group suggested five priorities that “a future BBC should aim to deliver for Scotland”—
- A BBC which represents the diversity of the public in respect of demographics, geography, interests and political opinion and does not simply report a narrow agenda focused on the Central Belt or Holyrood political debate.
 - A more participatory approach to setting journalistic agendas which may involve members of the public getting involved in identifying topics of importance and moving away from a narrow range of sources (business people, politicians, media personnel) to those with expertise and experience of all areas of public life.
 - A BBC which is independent from government in respect of both journalistic freedom, and a BBC Scotland which has autonomy from London in respect of its reporting practices and agenda.
 - A BBC which responds to a changing set of informational needs in respect of new forms of expertise and more relatable content with everyday application - a good example drawn from research with focus groups is Martin Lewis, moneysavingexpert.com, with his cross-media model of trusted expertise and audience participation.
 - A BBC that can be trusted to offer the best, most accurate account of what is going on in the world and which is not compromised by ‘AI slop’, clickbait headlines, or the tabloidization of reporting. ⁵
110. There are four broad headings in the Green Paper – a trusted institution, delivering services for the public good, driving growth across the UK, and sustainable and fair funding ¹ – under which this central question of the priorities for the BBC in Scotland is considered below.

A trusted institution

111. This section addresses news provision in terms of: data on audience trust; people’s interest in the news; “truth with no agenda”; the demise of The Nine; the risk of a two-tier system; brand legacy; perceptions of mainstream media bias; accessibility; lessons from the pandemic; the provision of local and relevant news; the need to cater for both linear and online audiences; the growth in hyperlocal news; STV’s

proposed changes to news for the north east; the extent of BBC Scotland’s autonomy; levels of trust in the BBC and in BBC Scotland; and the Scottish Government’s views on “persistent systemic shortcomings” in UK network news coverage and its making the case for decentralised editorial control and stronger commissioning in the nations.

News provision

112. People are increasingly accessing news online but Ofcom’s Transmission Critical: The Future Of Public Service Media report in 2025 found that “they typically rate these services lower than the broadcast channels’ news on a number of attributes”—
- Under half of those who regularly use social media for news score it highly for accuracy (43%), trustworthiness (44%) and impartiality (44%)
 - In contrast the PSBs have significantly higher levels of trust in their broadcast news – 68% for regular viewers of BBC, and similar for regular viewers of the other main TV news providers – ITV (68%), Sky (67%), Channel 4 (72%), and Channel 5 (60%)³
113. Its report also found that “audiences continue to see high quality news as important, with 49% of UK adults ranking the provision of ‘trusted and accurate UK news’ in their three most important attributes for PSBs”; and “access to accurate local, national and international news they trust provides the foundation for civic debate and democratic society”.³ The regulator told us that news broadcasters were posting on social media “or wherever everyone is” but needed to ensure their content was clearly attributed “because the legacies of those brands are really important”.⁴
114. Ofcom’s latest Media Nations: Scotland report showed that there continued to be “a significant amount of interest in news about Scotland. Just under half of all people aged 16+ in Scotland who follow news claim to be ‘very interested’ in news about Scotland (48%) – this is higher than the equivalent figures for other UK nations and rises to 88% for those who are either ‘very’ or ‘quite’ interested” and—
- ” About a quarter (27%) use STV, and one in five use BBC One (22%), through programmes such as STV News at Six and Reporting Scotland. For the BBC, the figure rises to 28% when BBC One and BBC Scotland’s news output are taken together.¹⁸
115. Professor Happer said people were accessing news that originated from the PSBs but were not always aware of its origin, raising “questions about the licence fee as a funding model”. Twenty years after devolution, “one of the most important constitutional changes in the past 100 years”, the launch of the BBC Scotland channel in 2019 was a sign of “finally catching up. However, making reference to its “flagship news broadcast” The Nine and its cancellation in 2024, she said audiences were now “so low that the channel is not fulfilling its role in public service media” nor “bringing in audiences to Scottish stories, Scottish experts and Scottish voices”. Concerned that the BBC was “not serving younger and lower-income groups quite so well”, she highlighted a “danger that access to news content from broadcasters will become a two-tier system”.⁶

116. Research by Glasgow University Media Group found a decline in trust in broadcast news from BBC Scotland and other professional news providers in recent years. This was due to what was “perceived as the political agenda...which serves those in power and does not speak to the interests and priorities of normal people”, with political reporting in particular being “perceived to be remote from everyday lives” and—
- ” key issues are the class backgrounds of journalists, and the dominance of news from London and the Central Belt. Many people seek out alternatives to counter what they perceive as ‘mainstream media bias’.⁵
117. It argued for “a greater diversity of voices, a need to counter the agenda of politicians, and to move to more accessible forms of language and presentation” and that it was “not enough to simply direct people back to mainstream news for ‘truth’ or ‘accurate information’”. People had to “believe news is serving their interests” and the research showed people “still turn to broadcast news in times of crisis”; and there should be lessons in how “both mainstream audiences and those most disconnected were reached” during the pandemic.⁵
118. BBC Scotland said that in a world of choice of where to access news, “the BBC is more important than ever” and it needed “to provide a distinctive, trustworthy, tailored service for the licence fee payer, reach audiences wherever they are and provide news that is relevant and local while explaining and analysing the bigger picture of world events”.⁹ The BBC’s consultation *Our BBC, Our Future – Engagement Results for Scotland* found that—
- ” 93% of the respondents said it’s important the BBC seeks to pursue truth with no agenda.⁴¹
119. Geographically, BBC Scotland had “more bases in Scotland—14, of which 12 cover news—than any other broadcaster or media organisation” and was “absolutely committed to being outside of the central belt in all of our regions”.⁹ Its journalists were being asked to provide “content for a number of different outlets” and the “linear piece” was “a challenge” because—
- ” we are riding two horses at the moment. We are pushing into the areas where younger audiences receive their news and general content while serving audiences that are still very loyal to our linear services.⁹
120. It recognised that “audiences want more local news” and “hyper-local news is becoming more and more of a thing”, and was “absolutely committed to covering that”. There was active consideration of “whether we should expand the number of local democracy reporters” and being “open to more of that sort of model” but an awareness that there could be “a risk” in some localities of undermining Scotland’s “really active court agency service”.
121. BBC Scotland took “no pleasure in the cuts at STV” and noted that it was “good for us to have active competition across the whole of the country”. A number of its “best journalists” were in the Aberdeen newsroom and had “come through the STV system”. There were “all sorts of active relationships with STV in the north” and “the dilemma of making more content with fewer journalists” was understood.⁹

122. Responding to a question about control from London, BBC Scotland’s Director said there was “no evidence of that” and “we run our own newsroom and I do not receive instructions from anyone on how to run it”. She said there had been “a huge amount of change” in how the BBC works since the 2014 referendum and “we collaborate better, we have a better pool of resources and we better understand how the nations work”. Network news was “a large beast” and meetings involved “huge representation from nations and at a Scotland level, so it works in both directions”. The next Scottish Parliament election and any future referendum would be “huge stories” of international interest and attracting journalists from “across the UK” but “the editorial lead on the story will come from here”.⁹ The issue of public perceptions / expectations and BBC Scotland’s autonomy is considered further in the next section.
123. More generally, while levels of trust in the mainstream media were “declining overall”, the BBC remained “highly trusted in comparison with other institutions in this country and abroad”. In Scotland “83% of the country consumes BBC content every week” and the number “goes up to 90-odd% every month” and “when people are asked which broadcaster they trust the most”, it scored “almost 50% of the total”. Between the last two UK elections “trust scores for Scotland in particular went up” and “the way in which the country views us is pretty stable in terms of reliability”. If there was a decline it was “in the margins” and the BBC was “holding up strongly on trust”.⁹
124. The Scottish Government considered that a quarter of a century after devolution there were still “persistent systemic shortcomings” in UK network news coverage and “a consistent tendency to frame devolved Scottish policy developments primarily through their perceived implications for the UK Government”.²¹ The Cabinet Secretary cited a recent example of how “the BBC network managed to misreport the headline announcements from the Scottish Government budget”,²⁸ suggesting the “inability of the BBC...to report the realities of devolution and the asymmetrical nature of Governments in the UK”. This amounted to “misleading licence fee payers in Scotland” by misreporting or not reporting and was “not good enough” for a PSB. He said—
- ” The BBC has a systemic problem in its news coverage in relation to commission and omission. It has guidelines but is not fulfilling them.²⁸
125. The Scottish Government also highlighted the recently published Independent Thematic Review of Portrayal and Representation in BBC Content⁴² (“the Independent Thematic Review”) and suggested that its findings “reinforce the Scottish Government’s view that decentralised editorial control and stronger commissioning in the nations are essential to providing trusted, pluralistic and relevant news for Scottish audiences”.²¹ The key considerations from its response to Ofcom’s consultation on STV’s proposed changes to regional programming commitments included—
- Plurality and local representation are fundamental to trusted media
 - Regional and sub-regional news is essential to democracy
 - Scotland faces a cumulative decline in public interest journalism, with structural pressures across BBC Scotland, commercial broadcasters, local newspapers

and digital outlets

- There is no persuasive evidence that consolidation models centred in Glasgow or elsewhere maintain audience trust, engagement or editorial diversity
- Digital expansion is welcome but cannot substitute for universally accessible broadcast news ²¹

126. **The Committee recognises the changing shape of a news landscape in which people are increasingly accessing news online and yet trust in the Public Service Broadcasters remains higher than for online sources. We heard from witnesses that audiences continue to value high quality news, with the percentage of Scottish adults who follow and are very interested in the news scoring higher in Scotland than elsewhere in the UK. But there is concern that the BBC may not be serving younger and lower-income groups as well as it should and a risk that access to broadcast news could become a two-tier system. We were also told of an erosion of trust in broadcast news and a growing suspicion of the mainstream media, with perceptions of a political agenda and a London or central-belt bias.**

127. **Against this backdrop, we acknowledge the challenges faced by the BBC and the other Public Service Broadcasters in “riding two horses” when providing a service to both an online audience and those consuming news by more traditional means. We agree that “the pursuit of truth, with no agenda” should be the BBC’s first priority. ⁴³ What concerns us – as highlighted in 2008 by the BBC Trust paper on BBC Network News and Current Affairs Coverage of the Four UK Nations report ⁴⁴ – is the suggestion that the BBC Network continues to fall short in serving the interests of licence fee payers in all parts of the UK equally, i.e., it is still missing opportunities to more consistently reflect the reality of devolution in terms of the precision, range and clarity of its reporting.**

128. **In light of such a long-standing frustration, we encourage the UK Government through the Charter Review to re-emphasise the need for the BBC Network to better focus on the everyday realities of devolution – what is devolved, what is reserved, what applies only to England or Scotland, which government is being talked about, which NHS the story refers to etc., – and for the BBC to demonstrate beyond simply updating any guidelines or training that its programme makers are able to relay those realities to multiple audiences in a clear, precise and consistent manner.**

129. **Having previously raised concerns about the depth of the coverage of the Scottish Parliament’s proceedings with the Director-General in February 2025, ⁴⁵ and subsequently written to him on the matter, ⁴⁶ ⁴⁷ we note that**

there appears to be little interest from BBC Scotland in covering the work of committees – in contrast to the BBC Network news’ coverage of Westminster committees – and no regular live coverage of the parliament’s proceedings on the BBC Scotland channel. Noting the Green Paper’s focus on safeguarding the public’s confidence in the BBC’s commitment to reliable and trusted journalism, creating spaces for civic debate and a healthy information environment, supporting social cohesion, promoting democratic values, and renewing the BBC’s role as a national and civic institution, we believe that BBC Scotland should be more attuned to and engaged with the work of Scotland’s national democratic institution and legislature. Recognising that the BBC has focused resources on the Local Democracy Reporting Service, an approach that we support, the Committee also recommends that the UK Government and the BBC consider how the currently limited coverage of the Scottish Parliament can be revisited and considerably improved.

Delivering services for the public good

130. The following section covers the expectations of Scottish audiences and also evolving audience behaviour.

Expectations of Scottish audiences

131. Issues included below are: the importance of the BBC reflecting people across the UK; Scotland viewed as a region and not a nation; the case for greater autonomy and governance reform; a “London-centric problem”; “the perception of impartiality”; telling nations’ stories rather than “our national story”; a desire not to be restricted to subjects about Scotland; serving audiences in Scotland and across the world; the importance of being independent from governments; the BBC being more than the sum of its parts; the World Cup as a national event; and the Scottish Government’s views on the need for production to be “rooted in the location” and the for BBC Scotland to be a “genuine partner” rather than a “regional outpost”.
132. From the respondents to the Our BBC, Our Future – Engagement Results for Scotland consultation—
- ”** 80% said it’s important to reflect people across the UK and different parts of the UK. ⁴¹
133. Professor Beveridge asked “how we ensure that we get Scottish stories, not just Scottish scenery”. ⁶ Scotland had always been viewed “as a region and not as a nation” by broadcasters and therefore he did “not think that viewers and listeners get a good deal out of the current public service broadcasting settlement”. Research by Cardiff University showed that the settlement “does not enable the nations of the UK to properly understand one other”. ⁶ A federal structure might entail “a board that sat above the executive” similar to the BBC Trust which “used to oversee the BBC”. ⁶ He also suggested that BBC Scotland should have full autonomy over BBC One Scotland scheduling and BBC2 or BBC4 be headquartered in Scotland. ³³

134. More autonomy for BBC Scotland was “an important aspect of this discussion” for Professor Happer. In terms of the decline in audience trust of traditional media she said “one of the ways in which that manifests itself” was via a perception of the PSBs being “far too close to government and politicians”. An “historical disaffection with the coverage of the independence referendum” had lent this view “a particular character in the Scottish context”⁶ and there was “certainly a perception that London was calling the shots”. She said—
- ” The more that BBC Scotland and its journalism can be independent from London and from politicians in both Westminster and Holyrood, the better. That is a really important aspect of rebuilding trust in journalism.”⁶
135. In terms of BBC governance and “recent controversies about political appointees to the BBC board”, Professor Happer said these appointments were “based on Westminster politics”. There were suggestions of “rethinking” the BBC’s structure “to bring in members of the public and industry” rather than political appointments. There was also “an argument for a Scotland board that can make decisions and be answerable in respect of BBC Scotland as an autonomous institution” and “directly answerable to the people who work at BBC Scotland”. Such an approach would have “ripples for all broadcasting in Scotland”.⁶ The NUJ also recommended governance reform, suggesting that 25% of BBC Board positions should be held by workers and that political appointments be avoided “to change the culture of an institution”.¹⁶
136. Professor Happer’s view was that “the BBC does have a London-centric problem” and that it “seeps into the coverage” and impacts on “the degree to which BBC Scotland can actually serve the needs of its own Scottish audiences”.⁶ She expressed concern with the Director-General having talked about “the perception of impartiality”, and did not consider it acceptable to argue that “if both left and right are complaining, we are doing something right”. The more the BBC took that approach then “the less it speaks to Scottish audiences”, particularly when they can now access “hyperlocal media”.⁶ She agreed with Professor Beveridge that it would be “a positive move” to have it written into the Charter that senior BBC executives should “actively engage” with the “politics and the teams in the nations and regions”.⁶
137. Screen Scotland argued for both “a greater level of devolved governance in the BBC” and “a greater role for the Parliaments in Wales, Northern Ireland and Scotland alongside” that of the Westminster committees and UK Government.⁴ All 11 MPs from Westminster’s Culture, Media and Sport Committee were from English constituencies and “10 out of the 11 represent constituencies in the south-east of England”. In the past “the BBC’s own governance structure included strong committees in Scotland, Wales and Northern Ireland” to support the board in London and challenge as necessary. The wish was for a return “to a system in which the BBC’s governance is much more strongly devolved across all four nations”.⁴
138. Professor Higgins also wanted it acknowledged that “we are a union of nations” and that this should be “built into the culture of the whole organisation”. He said of the of the Green Paper—

- ” It opens with a clear statement on the BBC’s role in telling “our national story”, and I think that it is really important that that is challenged. Its role is to tell several nations’ stories—that should be in the plural.⁶
139. Screen Scotland told us that “we absolutely want to see Scottish subjects, Scottish voices, Scottish places and Scottish people on our screens UK-wide” but “if a Scottish producer is required only to make things that represent Scotland, they are restricted”. An example was given of a pitch “to make a three-part documentary series about Rembrandt” but the response was “maybe do Walter Scott”. The question was why be “restricted to subjects about Scotland” when documentary makers “in London are omnivorous and can graze where they want to graze?”⁴
140. BBC Scotland said it made “programmes that serve audiences here, but we also take Scottish stories across the world” and understood how “vital our work is” in serving “audiences across the country”. There was a need to ensure that “people in Scotland are finding content that they find valuable, interesting and worth spending their time with.”⁹ In terms of reflecting “the lives of people in Scotland”, the streamers “might come in and make only one show a year that does that” but “we have to be in the game of making a volume of shows in which people feel that their lives in Scotland are reflected”. This did not mean it could “be the broadcaster of market failure” and there was a “need to make successful shows to bring people to the BBC” but “if big hits were the only thing that we did, we would not invest in ‘Disclosure’ or ‘Debate Night’”.⁹ Regarding news coverage of both governments, BBC Scotland said “we have had a lot of politicians who are part of the UK Government, not only the Scottish Government, on our programmes” and in a 2025 survey—
- ” The audience has told us that it wants us to be independent of Governments—plural—which is important [and] that was actually seen as more important by respondents in Scotland than by those in other parts of the UK.⁹
141. In terms of accountability and oversight, agreement was reached “with this Parliament and with the Senedd in Wales about 10 years ago to lay our annual report and accounts at those Parliaments, despite broadcasting being reserved”.⁹ The BBC was “independently regulated by Ofcom and, in Scotland, we have a direct relationship with the regulator”. Governance-wise the BBC has had different structures in the past, “governors at one point and then the BBC Trust”, and the current set up was “absolutely up for debate and change”.⁹ There was a “director of nations, who sits on the BBC executive committee” and enables BBC Scotland to make “strong representation through that”. It was suggested that “we work well as more than the sum of our parts”.⁹ Addressing the London-centric criticism, BBC Scotland said “none of the three people here, who are based in Scotland, reports to anybody in London”, “there seems to be a view of what the model is versus the reality” and “maybe we need to get better at explaining that”.⁹
142. With Scotland having qualified for a World Cup for the first time in 28 years, BBC Scotland was “ambitious” in its planning and wanted “to cover not only the games taking place in America” but to bring people together with the World Cup “as a national event in this country”. Non-regular or lapsed viewers might tune in to watch a game and “stay for something else”. Beyond the World Cup there would be

conversations “to keep the Scotland games on free-to-air television”.⁹ BBC Scotland had argued that showing the games “would be a good thing for the whole of the UK”^{iv} and there was “match funding, with both Scotland money and network money going into the Scotland games”. That approach had “paid off in terms of raw numbers for the whole of the UK” but given financial realities “everything that we do means that we stop doing something else” and there were no future guarantees. Citing the example of losing out in its bid to cover the Commonwealth Games, BBC Scotland said “I hope that TNT makes a brilliant job of it for the audience”.⁶

143. The Scottish Government noted the findings of the Independent Thematic Review which “identifies risks arising from continued centralisation of senior editorial power in London” and “provides important evidence on the underrepresentation of nations and regions in network content”. The review concluded that “while the BBC has made significant progress in diversifying voices and investing across the UK, material gaps remain – particularly in the portrayal and representation of working-class audiences and people living outside London and the south of England”. Welcoming the Review’s recommendation that “the BBC develop a new, more comprehensive measurement framework, including class and geography”, the Scottish Government supported work “driven by commissioners who understand the communities being depicted” and agreed that “genuine production, rooted in the location, made by people who understand it in depth is fundamental to on-air authenticity.”²¹
144. Its view was “that the future strength and credibility of public service broadcasting in Scotland depends on a significant expansion of autonomy for BBC Scotland”. It acknowledged the evidence from the Committee’s inquiry, was critical of “strategic, editorial and financial decisions” being “largely controlled from London”, and agreed “with experts who assert that Scotland requires a BBC that is empowered, accountable, and structurally equipped to operate as a genuinely national broadcaster”. A “key area” of evidence was “the call for a more federal BBC structure” within which BBC Scotland could be treated as “a genuine partner within the wider organisation rather than as a regional outpost”. This would provide “meaningful control over schedules and commissioning” and enable BBC Scotland “to serve Scottish audiences more effectively rather than relying on limited opt-out arrangements”. The Scottish Government agreed with other witnesses that BBC Scotland required “greater structural independence, enhanced editorial authority, more appropriate governance arrangements, and stronger financial resources.”²¹
145. The Cabinet Secretary noted that broadcasting and the BBC were reserved and the latter was “answerable to a House of Commons committee in which there is literally no lived experience of what broadcasting is like in the nations of the United Kingdom outside England”.²⁸ There being no BBC England, the challenge was that the BBC Network was “both BBC England and BBC UK at the same time”. This could be “really confusing for most of the people who work in it, who are not from Scotland, Wales or Northern Ireland” and “the only solution is for there to be decision making here, in Wales and in Northern Ireland.”²⁸ Describing a “critical moment for broadcasting” and “the generational opportunity for change that the

^{iv} The Scotland v Denmark game drew an audience of 1.1 million in Scotland and an average audience of 2.7 million across the UK⁴⁰

BBC charter review presents”, he said—

” It is vital that the Scottish Government takes this opportunity to ensure that the interests of Scottish audiences and creative professionals are reflected. ²⁸

146. **A decade ago our predecessor committee reported as part of the previous Charter Review process and identified “a need for the BBC to represent Scotland and the diversity of Scottish culture more effectively”. ⁴⁸ The evidence from our inquiry suggests that it remains a valid finding. Witnesses told us of a London-centric problem, of Scotland being seen as a region and not a nation, of public service broadcasting not enabling different parts of the UK to understand each another, of the need to rebuild trust in journalism, of the case for greater autonomy and governance reform, of the shadow cast by BBC’s coverage of the 2014 independence referendum, of the importance of the BBC telling nations’ stories rather than “our national story” (the latter as stated at the outset of the Green Paper), and of a wish nonetheless not to be limited to producing Scottish stories.**

147. **We also note the findings of the Independent Thematic Review, including strengthening of the BBC’s local decision-making across the UK, so that this happens closer to its audience, and concern that a more costbased and centralised approach could risk losing some of the depth and diversity in how different parts of the UK are portrayed. The Review also found that despite the BBC having made significant progress in diversifying voices and investing across the UK, material gaps remained – and in particular the portrayal and representation of working-class audiences and people outside of London and the south of England.**


148. **The Green Paper states that the Charter review will examine how the BBC can tell a unifying national story which is responsive to all UK communities, while also representing and preserving different cultural identities across the UK’s nations and regions. It also emphasises that the broadcaster must be a truly universal service – that all parts of the UK should feel represented by the BBC’s output – and able to speak to and represent the diverse communities who fund it. In the interests of better promoting Scottish culture and Scottish talent, the Committee’s view is that there must be greater emphasis on Scottish voices telling Scottish stories. This is germane to commissioning processes and regional production quotas, local news provision, and minority language broadcasting, all covered elsewhere in this report, but also to the proportion of funding from the licence fee raised and spent in Scotland. We consider this issue of the BBC’s overall spend in Scotland under the Sustainable and fair funding heading and sub-section on Licence fee (see paragraph 220).**

149. **The Committee’s view from the evidence we heard is that Scotland needs a BBC that is ambitious and accountable, and a BBC Scotland that is more devolved in its governance, better attuned to its audiences, financially and editorially empowered, in greater control of scheduling and commissioning, politically unencumbered by either government, firmly on the front foot in terms of leadership in the Scottish screen and broadcast sector, and fully able to fulfil the role of national public service broadcaster. We therefore invite the UK Government, the BBC and Ofcom to consider whether the BBC should adopt a more federal structure, one in which BBC Scotland would be a partner rather than a subsidiary, with greater fiscal and editorial control and commissioning power in each of the constituent nations of the UK.**

Evolving audience behaviour

150. The issues below include: “seismic shifts” in how content is created, distributed and consumed; data on Scottish audiences; the success of the iPlayer, discoverability and reaching different audiences in different ways; the BBC Scotland channel’s approach to programming; reaching audiences at a younger age; the principle of universality versus that of diversity; the need to meet the audience where they are; the BBC’s partnership with YouTube; making content that people value and can access; TV Licence take up; changes in Radio Scotland’s late night scheduling; the audience for radio; and the Scottish Government’s views on the future of Digital Terrestrial Television.

151. Ofcom’s Transmission Critical report described how “seismic shifts” in broadcasting – including how “content is created, distributed and consumed” – were “well underway and the next few years will be critical in determining the future of UK broadcasting”. The regulator called for “urgent action...to strengthen and maintain public service media”, and to provide “trusted and accurate news” and homegrown stories that could represent “the diversity of the nations and regions of the UK”.³ It was “really important to look at how audiences are behaving” in terms of their migration and—

 88% of Scottish people tell us that they prefer to get their local news and information from online services such as websites and apps.⁴

152. Ofcom also found that “82% of adults and 66% of children in Scotland used the BBC each week” with Scots “having a positive perception of the BBC (61% of adults) and 56% saying they would miss the BBC if it wasn’t there”. Though Scottish audiences were “less positive about the BBC than those in other UK nations at the start of the current Charter period”, the regulator stated that “recent figures now show that their views are broadly consistent with figures elsewhere in the UK”.³⁴ Older audiences were perhaps more likely “to watch those linear programmes – they are the audience” but Ofcom also warned against stereotyping those over a certain age. Its research showed that “the biggest growth in the numbers of those who are turning to YouTube on the TV set in their living room is among people who are older than 50”.⁴

153. Professor Higgins said the creation of the iPlayer was “one of the most successful things that the BBC did in recent years” because it allowed young people to “search for and find a programme” through “a platform rather than on a linear channel”. The broadcaster had been “ahead of the game” but it could do more⁶ and “discoverability” and reaching “different audiences in different ways” was one of its biggest challenges. He outlined two categories: those “listening to the wireless and often watching the linear television” and others accessing programmes on the iPlayer and who should “be engaged with via social media”. The BBC needed to cater for both and was “trying to do so, but with very modest means”.⁶ He also recognised the challenge for linear broadcasters as viewers were lost “to streamers and online content” but encouraged BBC Scotland to be more creative and inclusive in its programming rather than have a heavy reliance on certain formats. With “a monthly audience share of 0.12%” for the BBC Scotland channel there was “scope to experiment more boldly with its schedule”.³⁵
154. Professor Happer described podcasting as “a real growth area” and “the BBC has been very clever on that” taking its radio programmes and rebranding them for BBC Sounds. The BBC had “always been incredibly innovative” and was “one of the first to drive video streaming” via the iPlayer before “the market took over”. Scotcast was “talked about a lot” in her focus groups and seemed to be “an area where BBC Scotland is actually reaching hard-to-reach audiences”.⁶ She said there was research to suggest that under-15’s were “now turning away from the digital landscape” and moving their attention back to “parents, teachers, carers and all sorts of people in the community”. This could be the reaction of one generation to another, with Gen Z being “so immersed” in the online world, but the BBC “should be moving into that space” and playing “a crucial role by talking to audiences at that early stage”.⁶ Also concerning younger audiences, Professor Higgins suggested that paying £8 “to see a really good Scottish film” was not so “dissimilar to what the monthly price might be for the [TV] licence”. This was about the quality of programmes and “the discoverability of that quality”.⁶
155. As to the question of whether BBC Scotland was “making decisions to meet the needs of younger audiences” and “taking for granted the audiences that it already has”, Professor Happer thought there was an inevitability about that based on audience numbers⁶ but—
- ” The principle of universality is problematic here because diversity is a much more important principle.⁶
156. Screen Scotland said “the BBC started radio and television” but “it did not start YouTube or the internet delivery of video content”. It was “moving more of its content” to those platforms because “the answer is for it to be there and meet the audience where they are”. In response to “serious and fundamental challenges for the culture and democracy”—
- ” There needs to be a bedrock of ensuring that young people understand that public service broadcasting is vital and that, without it, we are just in the wild west of make believe.⁴
157. BBC Scotland recognised that “people expect content to be available where they already are” and explained that its partnership with YouTube was “not a shift away

from the BBC’s own platforms but a formal strategic development of a longstanding engagement”. The partnership included “investment in content to showcase the best of BBC storytelling and journalism for under 25’s; collaboration to highlight shared cultural moments and a training commitment to content creators”. This was about creating “a discovery point” and ensuring “BBC content remains relevant and discoverable in an increasingly fragmented digital world”. Addressing concerns about the risk of reputational damage from being placed alongside less trusted or more controversial content from other providers, BBC Scotland stated that “clear branding and attribution are central to the partnership” and would ensure “audiences can easily recognise what is BBC content”. As “discovery increasingly happens on third-party platforms” – and the “serendipity of discovery is a core part of how people now consume content online” – it was important that “trusted BBC journalism and programming, governed by strict editorial standards, are present within that mix” rather than have “other forms of content, some unreliable, fill the space” and so—

” Being absent from YouTube could create a greater risk.

158. In terms of “riding two horses”, it was about “how we pivot in telling stories to slightly different audiences in different places, while maintaining television, radio and online services for people” and “people need to see value in the BBC, so we need to make content that they value”. Part of the strategy was to “bring in people for big-hitting dramas...and then they will see what else is available on the BBC”. The future of Freeview was “a matter for the UK Government, not for the broadcasters” but the BBC did “not envisage any scenario where people were left behind” and emphasised that “a universal public broadcaster needs everyone to have access to its services”.⁹
159. With regard to the TV licence, BBC Scotland said “the vast bulk of people who require a licence have one”, there had been “a spike” in sales after “it became a legal requirement to watch the iPlayer with a licence”, and “under-35s use the BBC a lot”.⁹ The issue of the licence fee and future options for funding the BBC is considered later in the report.
160. We were told that BBC Radio Scotland’s audience had declined by “about a fifth” in recent years and the broadcaster did not want to “wait for things to become a crisis before we change them”. Changes had been made to the breakfast output and nighttime schedule “to develop people and bring in new talent” and address those “areas where—to be frank—the audience decline needed to be stopped”.⁹ These changes “attracted a lot of noise” and “we are always going to make a small number of people unhappy if we change the schedule”. The suggestion of “pulling away from the Scottish music sector and not supporting Scottish artists and new artists” was “misinformation”⁹ and “some of the confusion” may have come from the procurement process but—
- ” We are not playlisting and we are not reducing the number of Scottish artists. That would not make any sense to us.⁹
161. BBC Scotland’s view was that “there is a fight to be won”. There was “a market for radio overall” and “the number of listening hours is not going down”. The approach was to provide “quality content” and “a certain tone of voice” that would attract listeners with “a warm, inclusive, distinctive, respectful identity-based tone of voice”.

The twenty five year olds were “probably going elsewhere” but “across a really broad age demographic, we can bring people back in”.⁹

162. The Scottish Government recognised that “technological change, market pressures and evolving audience behaviour are reshaping the sector”. The sector should retain “a strong focus on protecting access to high-quality broadcast content” and ensure “content remains discoverable on digital platforms”. The Scottish public “watch more broadcast television than any other UK nation and nearly nine in ten people listen to radio weekly” but “audience habits are rapidly shifting, with more news and entertainment consumed online, through streaming services, and via short-form video platforms”.²¹

163. Speaking about the fragmented media landscape, the Cabinet Secretary noted the rapid advances in technology, the “intergenerational gulf in what one sees, consumes and is interested in” and yet “the decision makers tend to come from the older end of the age spectrum”.²⁸ He described the BBC as “making baby steps” with its presence on YouTube and accepting that “you have to go where the audience is going”. A concern was that—

” all of us who have an interest in this area are trying to find ways to regulate and legislate, and understand, something that is moving so much quicker than our ability to do those things.²⁸

164. The Scottish Government acknowledged “the music sector’s concerns about the potential impact” of Radio Scotland scheduling changes “on emerging Scottish artists” and the Cabinet Secretary had written to BBC Scotland “to seek a meeting to discuss the internal monitoring undertaken by the BBC regarding the number of Scottish artists featured”.²¹ He updated us on that meeting, at which BBC Scotland recognised its “role in showcasing talent” and gave a commitment that this would continue. On radio more widely, he recognised the need to evolve but was confident that it would “go from strength to strength” and appreciated “how good radio is in Scotland and the strong listening figures support that”.²⁸

165. The Scottish Government was also “committed to ensuring that audiences can continue to access the free-to-air television and radio services” and joined the PSBs in “urging the UK Government to consider the future of DTT [Digital Terrestrial Television] carefully and to ensure that any future switch-off is managed inclusively”. It agreed with the BBC that “any future changes to distribution technologies must be planned and delivered in a way that guarantees continued access to public service content for all households”.²¹ Ofcom also shared that view on DTT and sought “urgent clarity on how TV will be distributed in future in a way that will ensure audience-needs continue to be served” from the UK Government.³⁴

166. The Committee recognises the seismic shifts in broadcasting arising from technological advancement, global competition, the decline in advertising / funding, and evolving audience behaviour. In short: how content is created, distributed and consumed. We appreciate that public service broadcasters feel the need to “be where the audience is”, or is increasingly moving towards, while also providing for those who still favour the more traditional

scheduled output. We recognise the risk that placing PSB content into unregulated online spaces and platforms could blur the distinction between regulated and trustworthy PSB content and the unregulated context in which it sits. The Committee also shares the concerns of both Ofcom and the Scottish Government regarding Digital Terrestrial Television and the need for any future switch-off to be managed inclusively. We ask the UK Government to provide clarity as to how this will be achieved.

167. **We acknowledge the views of those in the music sector who have expressed their concerns about the impact of BBC Radio Scotland’s programming changes for new, emerging and even established Scottish artists. The Committee was not convinced by the responses we heard to these concerns and we ask BBC Scotland to share the basis of the approach to its internal monitoring regarding the number of Scottish artists featured in the new night-time scheduling and throughout the day. We welcome that BBC Scotland recognises the importance of its role in showcasing Scottish music, and has given a commitment that this will continue, but we consider that greater detail should be provided about how it will fulfil that role and its contribution to sustaining the talent pipeline and visibility of Scottish cultural output. We encourage both the Scottish Government and our successor committee to continue to pursue this matter.**

Driving growth across the UK

168. This section covers Scottish production, partnerships and skills development.

Scottish production

169. Issues included below include: the BBC’s economic contribution to the UK; support for Scotland’s creative economy; Screen Scotland’s ambition for the screen sector to reach £1 billion Gross Value Added (“GVA”) by 2030; spend on external commissions; support for TV production; advice on supporting Scottish producers; how the cost of the BBC Scotland channel might be redirected; the scope for a drama pilot season; a “reliance” on inward investment; regional production quotas, terms of trade and IP; the “opportunity market” for producers; a growth in the number of films being made in Scotland; investment in drama, comedy and factual shows; the commissioning model; and the Scottish Government’s support for a review of the quota framework.

170. According to the Green Paper—

” The BBC contributes almost £5 billion each year to our economy. For every £1 of direct economic impact generated by the BBC, a further £1.63 of economic output is generated in the rest of the UK economy, making its total economic contribution £2.63 against a sector average of £1.84. ¹

171. BBC Scotland’s written submission to the inquiry set out that—

- The BBC is the largest single investor in UK content overall (£3.1bn including news, sport, acquisitions, radio, audio, online, orchestras) and the largest single investor in UK TV content (£1.8bn)
 - 95% of public service spend is directed to content and its delivery
 - The BBC is the key PSB supporting the creative economy of Scotland; the vast majority of PSB spend on first-run programming for viewers in Scotland in 2024 was by the BBC3 with the BBC responsible for 75% of all PSB content spend on TV production in Scotland ⁴⁰
172. Screen Scotland’s research indicated there was GVA of £718m across the screen sector as a whole in 2023 (up from £567.6m in 2019) with 12,260 FTE jobs being supported. The Scottish Government described the “continued importance of PSBs as the core source of demand, financing and commissioning of TV programmes and documentary films made by Scotland-based producers”. The Programme for Government set out how it would “continue to support Screen Scotland to deliver its Strategy to 2030/31, with the shared ambition of achieving £1 billion GVA by 2030”.
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173. Ofcom stated that “spend on external commissions reached £225m in 2022, up from £119m in 2010 and there was an increase in the number of active production companies based in Scotland up from 32 in 2014 to 51 in 2022”. It suggested that “targeted regulation has supported this growth” alongside the “the skills and talent across Scotland’s screen sector” and “strategic moves from broadcasters to invest more of their money outside of London”. The “mixed ecology of production that takes place in Scotland” genre-wise and in terms of “the supplier base” was “a great strength of the sector”. ³⁴ However, the regulator also acknowledged more recent “challenges for production companies across the UK” to which Scotland was not immune and that “fundamental financial pressures are likely to persist...due to declining revenues and the increasing cost of production”. With the BBC and other broadcasters “increasingly focussing on fewer commissions with a higher impact to meet these challenges” it emphasised that “work may be necessary to build resilience in the screen sector”. ³⁴
174. In its strategy to 2030-31, Screen Scotland highlighted some actions in relation to supporting TV production and how rules around out-of-London programming support this. It set out that the agency would—
- Engage with the PSBs, Ofcom, the UK and Scottish Governments and Parliaments to press for intellectual property ownership to be part of any Ofcom measure of what qualifies a production as ‘Scottish’
 - Advocate for Scotland-based producers, writers, directors, production companies and crews to be the primary means by which the UK PSBs meet their Scottish quotas ²⁹
175. Professor Higgins encouraged BBC Scotland commissioners “to embrace a more creative and inclusive approach to programming” and suggested some ways in which they could be bolder in support of Scottish producers—

- a Scottish feature documentary slot
 - a drama pilot season
 - regular short film showcases
 - more international current affairs features³⁵
176. Angus Dixon made the case for “closing the BBC Scotland channel” and redirecting the money “directly into programming”,¹⁰ a view shared by Peter Strachan who wanted 5% of the license fee income raised in Scotland to “fund development of Scottish scripted and unscripted proposals”.¹⁴ Professor Beveridge thought there was “scope for running a drama pilot season” which could “be low budget” and highlight BBC Scotland “as a place for developing new talent”. It would only need “one in ten to hit” and become “something that it can sell internationally” but the BBC was making “only two or three things” and was “very risk averse”. At the UK-level, he welcomed the progress made by the BBC in “spreading the licence fee...across the United Kingdom” but saw a need “to emphasise and develop it”.⁶
177. PACT was “very much in favour of as much of that money as possible going into content” suggesting that the BBC contributed “£4 billion or £5 billion but only around £1.2 billion goes into content”.⁴ BECTU said “the huge majority of programme-making capacity was taken away from BBC Scotland and put into the commercial side”.⁴ Screen Scotland was concerned by “the reliance by the BBC on too much inward investment within the UK market to meet the Scottish quota” and said “we would like to see a rebalancing of that”.⁴
178. The “best way to grow the sector in Scotland” was, in PACT’s view, through “the regional productions quotas”. You had to “look at the framework, which includes terms of trade, the regional production quotas, the BBC licence fee and origination quotas” which together “enable the diversity of supply”. PACT thought that the quotas were “flexible enough to allow for innovation to happen” but was wary of “sub-quotas or sub-definitions” having the opposite effect.⁴ There should be “no weakening of the quotas around nations and regions” and “the industry need to be very vocal about the importance” of those quotas “and the independent production quota as well”.⁴
179. Sixty per cent of the revenue for PACT’s members was “London-centric” which was “why the nations and regions quotas are vital”. UK broadcasters “had a tendency not to look beyond the M25 unless they are required to do so” according to Screen Scotland.⁴ The BBC was “talking about doubling its investment outwith London and going beyond the Ofcom criteria” and it was important to “hold the BBC to those commitments”.⁴ The issue of quotas is covered in more detail earlier in the report under the Current regulatory frameworks heading.
180. Screen Scotland said “the terms of trade” – by which independent production companies “retain the IP and the content that they deliver to the BBC and Channel 4” – were the “fundamental move that kick-started the growth of the sector in the UK” and “the health of the sector depends on IP ownership”. This was “where the long-term value is”, a good example being *Still Game*, which was “massively

successful on Netflix”, the IP owned by a production company in Glasgow—

” It is about money, scale and leadership, and the IP in the long term, because that is what allows producers to reinvest income in new ideas that deliver new business. ⁴

181. For the number of projects commissioned by the big global platforms “we can count them on the fingers of one or two hands” whereas BBC and Channel 4 were still “the opportunity market for Scotland-based producers”. ⁴ Screen Scotland also said that over the last Charter period, contributing to the creative economies of the whole UK had “meant production in Scotland—that is, location filming and elements of production taking place in Scotland on projects that qualify as Scottish”. For the next Charter “we would like to see much more creative origination from within Scotland, which concerns issues of representation and diversity of voice.” ⁴
182. In terms of Screen Scotland’s role there had been “consistent growth in the number of films that are made in Scotland” since its inception in 2018. The UK tax regime was also “really attractive” for production and that it was “uniform across the UK” was helpful in avoiding confusion “for the average decision maker for Warner Brothers in Burbank”. There was though “constant competition” and “Ireland has just improved its tax regime for production across factual programmes” which presented “a proper risk for us”. ⁴
183. BBC Scotland said it was “super ambitious for our content, both in taking what you might call ambitious, risk-taking editorial decisions and in expanding what we do”. Nine out of ten companies that it commissioned were Scottish and *Highland Cops* was an example of “a brilliant factual show”, “made in Scotland by Scottish producers” and “the kind of show we want to commission”. The emphasis was shifting, however, and “we are not making so many of them now, because we need to invest in drama, comedy and premium factual shows”. ⁹
184. There was no shortage “of really good scripts” and “we could make more content than we do” but “within the BBC’s financial constraints, we do pretty well” and third-party finance was “really going to front load things in the future”. Having “more senior leaders and more commissioning power in Scotland” would be always be welcome but the commissioning model was “successful” particularly for drama and comedy for which “both sets of commissioners are based in Scotland” ⁹ Regarding Ofcom’s production quotas, that was “a matter for Ofcom if it wishes to change them” but “we beat all our quotas at the moment” and—

” We will only by exception have programmes that are made in Scotland that qualify on only one criterion, and we are front loading the spend criteria so that more money is invested into the sector in Scotland. That is our ambition. ⁹

185. Ofcom stated that the BBC had “consistently met its production quotas which require 8% of network spend on and hours of production being attributed to Scotland” and did so “with the vast majority of productions meeting at least two out of three of our criteria – substantive base, production spend and off-screen talent – in recent years”. From Ofcom’s *Made Outside London Register* assigned to Scotland, 87% of the BBC’s entries “met at least two out of three criteria in Scotland, with over half (57%) meeting all three”. ³⁴ There is more detail on

Ofcom’s regional production quotas earlier in the report under the heading Current regulatory framework.

186. The Scottish Government praised Screen Scotland for continuing its “excellent work across the screen and broadcasting sectors”, including “support for the Production Growth Fund and Broadcast Content Fund” and “helping our sector to stay globally competitive for future generations”. It also supported “a review of the quota framework” to deliver—
- better alignment between quotas and genuine economic impact
 - stronger incentives for commissioning from Scottish-founded and Scottish-led companies
 - improved retention of intellectual property
 - greater transparency over how quotas are met ²¹

187. The Committee calls for a review of Ofcom’s regional production quota framework in the interests of improved alignment with economic impact, commissioning incentives, retention of Intellectual Property, and transparency. Whilst not an issue directly relating to the Green Paper, quotas are an important driver in the growth of the screen and broadcast sector in Scotland and we share the Scottish Government’s support for such a review.

Partnerships

188. This section covers: encouragement for the BBC to engage in “more meaningful partnerships”; the partnership between BBC ALBA and MG ALBA; the case for BBC Scotland “to do more and be more ambitious”; the necessity of coproductions; ongoing collaboration with Screen Scotland; examples of external partnerships and international funding; Scotland-wide partnerships; and the “new strategic partnership” with YouTube.
189. The Green Paper encourages the BBC to “deliver more through collaborations and partnerships to support the wider sector”. There are thought to be 370 existing collaborations and partnerships across the UK and the importance of “forging partnerships with smaller independent companies” is acknowledged. The UK Government agrees with Ofcom that “more ambitious partnerships are necessary amongst the public service media providers, and with others in the sector” and—
- ” A theme we are exploring in the Charter Review is encouraging the BBC to enter into more meaningful partnerships that are mutually beneficial for all parties involved. ¹
190. Professor Beveridge’s example of success was the partnership between BBC ALBA and MG ALBA, “particularly their commercially and critically well-received drama ‘The Island’”, and he suggested “we pump more investment into BBC ALBA”. ⁶ The subject of Gaelic broadcasting is considered in more detail later in the report.

191. BBC Scotland could “do more and be more ambitious” in the view of Professor Higgins. It should be “a sector leader on skills and development” and “a catalyst for the whole media ecosystem”. His concern was that “BBC Scotland is in many ways too insular” and “does not have enough relationships and activities with other stakeholders in the media ecosystem”. The examples he gave were the “return of a national screen skills committee, which the BBC could chair”, “bursaries and the BBC sponsoring events”. BBC Studios was also “sponsoring the London Film School’s showcase” in a couple of months’ time and BBC Film was “supporting the screening” of some of those films – “BBC Scotland could do similar”. He also saw “no reason why BBC Scotland could not be part of that wider European broadcasting commissioning system”.⁶
192. In terms of co-productions Screen Scotland said it was “impossible to fund a film with one source these days” and for independent films you had “to finance it in lots of different territories and with lots of different partners”. TV was “going the same way” with the market having moved on and the BBC no longer able to solely fund projects. All the current drama productions in Scotland, other than Sony or Netflix were “co-productions to some extent”. Counsels, the replacement for River City, was “a co-production involving multiple parties”.⁹
193. Screen Scotland had “a long-standing, though evolving, relationship with the BBC”. A formal Memorandum of Understanding “was in place from 2018 to the end of 2024” when “the BBC took the decision not to renew”. However, the two continued “to collaborate on production investment, skills development and education” with the “shared aim is to support creative ambition, company sustainability and workforce development in Scotland”.⁷
194. BBC Scotland told us “we have never had more partnerships and we have never looked more broadly” and “we absolutely should be a catalyst”. The emphasis was on “far more co-commissioning now” in order to “attract the bigger budgets from other parts of the BBC” and the broader industry.—
- ” Frankly, it is not easy to make the big pieces of content—the expensive drama that we are going into—without external partners, and we are constantly looking for external partnerships, across the country and across the world.⁹
195. Building on “the success of Guilt” when the BBC Scotland channel started, there were now “a raft of dramas and comedies that have international funding” – Counsels (with ZDFneo), Half Man (with HBO), Dinosaur (with Hulu), and The Ridge (with Sky New Zealand).⁹ Scotland-wide partnerships included with MG ALBA (with whom it makes BBC ALBA), the National Library of Scotland, the Royal Conservatoire of Scotland, the Scottish Graduate School for Arts and Humanities, the National Film and Television School, the Scottish Library and Information Council, and the Scottish Book Trust.⁹
196. BBC Scotland described its “new strategic partnership with YouTube” as “designed to ensure that the BBC continues to deliver value for all audiences in a rapidly changing digital environment”.⁴⁰ For more detail on BBC Scotland’s approach to YouTube, see the previous section on Evolving audience behaviour.

197. **The Committee appreciates the necessity of co-production and notes the Green Paper’s encouragement for the BBC to deliver more through partnerships and collaborations in support of the wider sector. We welcome BBC Scotland’s commitment to that approach and would encourage it to continue to pursue wider and mutually beneficial joint working.**

Skills development

198. Issues in this section include: the BBC’s leading role in skills development; Screen Scotland providing an overview; the “gold standard” of BBC training; screen education in universities and colleges; the case for spend on training being put toward production budgets; skills development for journalists; BBC Scotland’s apprenticeship scheme; its “ad hoc” dealings with universities; and the Scottish Government’s support for access to film and screen learning in schools.
199. According to the Green Paper the BBC has “an existing requirement to make an effective contribution to the preparation and maintenance of a highly-skilled media workforce” and offers a range of initiatives including “training, apprenticeships, and bursaries” across the country. The UK Government was “looking at options to enhance and adapt the BBC’s obligations, so that it continues to play a leading role in skills development for the sector”.¹
200. Screen Scotland said it was “important to have a mixed, managed economy” over which an agency such as itself “has an overview”.⁴ It detailed the work that it undertakes with the BBC, including: Supersizing entertainment formats, the River City training academy, and Traitors training opportunities. Also highlighted was work undertaken with other partners in which £2m per year was invested and along with inward investment to “ensure lasting benefits from transient projects by embedding training at all levels”.⁷ This was an approach providing “work-based experience” on productions including Dept Q, Outlander and The Traitors.⁴ PACT highlighted its Indie Scheme in Scotland which has been running since 2017.¹³ BECTU suggested that some training opportunities lacked strategic direction and did not reflect skills gaps. However, it highlighted work in partnership with Screen Scotland and the BBC which had “transformed the landscape around training and skills development” and been “fundamental to addressing real skills gaps through its long term skills planning and career development programmes”.¹⁵ The BBC “does a huge amount of training” every year with apprentices and remains “in many respects the gold standard” but “a huge number of people are being churned out by colleges and universities” whose expectations were not necessarily being managed.⁴
201. Professor Higgins drew attention to screen education in universities and colleges, suggesting that the BBC could do more to ensure there were opportunities for graduates from these courses. He wanted it to adopt a more formal “sector leadership role” by supporting training and work experience with universities that were delivering best practice and providing graduate bursaries and paid internships.³⁵ He said that the end of River City meant “no nursery slopes any more for new

directors coming through”. However, BECTU were “confident that, overall, there will be more employment opportunities for more people across the year” after River City.⁴ Angus Dixon suggested that the key issue was not a lack of skills but one of opportunities and “the money being spent on training would arguably be better used to put into production budgets” on the basis that—

” you can offer as much training as you like but it’s pointless if the jobs aren’t there.¹⁰

202. Glasgow University Media Group focused on skills development for journalists, making the case for “automation resilient” soft skills such as critical thinking, verification and storytelling, and seeking better data on where skills were needed in the sector.⁵

203. BBC Scotland told the Committee that it was “very ambitious on skills and training” and worked to ensure they were “embedded” in its own productions and those made with partners. There were “70-odd apprentices in the BBC” and “we have a relationship with every university in Scotland”, “some formal relationships with institutions such as the Royal Conservatoire of Scotland”, and others more informal relationships but “I could not find a university in Scotland that we do not have a relationship with”.⁹ Addressing the views of other witnesses that the approach lacked formality or consistency, it labelled the approach as “ad hoc” but said that relationships were “based on the skill sets that the universities are seeking and the skill sets of individuals in the BBC”. The offer was made that if universities wanted more contact, they could ask “and we will always say yes”.⁹

204. The Scottish Government was “supporting strong skills pipelines and employment opportunities” but “concerned that meaningfully Scottish, and Scotland-based, production is not adequately prioritised”. It highlighted the role that education can play in terms of “nurturing authentic Scottish storytelling” and enabling “learners to create, present and evaluate film-making”. The 2025-26 Programme for Government had committed to “supporting schools to access high-quality film and screen learning” to ensure “Scotland develops the workforce required to meet the demands of a £1 billion film and screen industry by 2030.”²¹ The Cabinet Secretary suggested the introduction of screen studies in Scottish schools was an international first with “the potential to be transformational”²⁸. He also said—

” I urge the BBC—and other public service broadcasters—to consider whether it could do more to support the next generation of Scottish talent and further develop the skills of those who already work in the screen industry.²⁸

205. The Committee welcomes Screen Scotland and the Scottish Government’s support for film and screen learning in schools. We also agree with the Green Paper’s suggestion of considering options to enhance the BBC’s obligations in terms of taking a leading role in skills development for the sector; and we invite BBC Scotland to reflect on the ad hoc nature of its contact with many universities in Scotland and to consider how taking on a leadership role could enable it to adopt a more consistent and outcomes-based approach.

Sustainable and fair funding

206. This final section covers savings, the licence fee and Gaelic.

Savings

207. In terms of savings the Committee was told that—

- The BBC has had a 30% real-terms fall in income over ten years from 2010 to 2020
- Substantial progress made towards our £700 million annual recurring savings target by March 2028, achieving total savings of £564 million since 2022/23.6
- The BBC has halved the number of senior leaders.⁴⁰

Licence fee

208. The issues considered here include: uptake of the TV Licence; future funding options; the impacts of falling income; more hybrid systems of funding; support for the licence fee model; examples from Germany and Denmark; the case for revisiting the funding structure; the necessity of “modernisation and reform”; arguments against advertising and subscription; and the Scottish Government’s views on exploring funding models and the case for Scotland having “a fairer share” of commissioning, investment and visibility.

209. The licence fee covers live TV (the BBC or any other provider) and the iPlayer. Uptake “remains high, according to the Green Paper, with around 23.7 million UK households holding a TV licence in 2024/25”, but the number has declined “by around 8.3% between 2014/15 and 2024/25”. Linear viewing now only “accounts for half of all in-home viewing” and despite the “record growth” of the iPlayer in recent year this has “not offset shrinking broadcast audiences”.¹

210. The UK Government “is keeping an open mind about the future of BBC funding” and the options under consideration are—

1. Supporting a more efficient, adaptable BBC that delivers value for money
2. Supporting the BBC to generate more commercial revenue
3. Reforming the process for determining the cost of the licence fee
4. Reforming the licence fee
5. Exploring whether licence fee concessions should be updated
6. Exploring options for fairer collection and enforcement, supported by technology
7. Exploring options for funding the BBC World Service
8. Supporting sustainable funding for minority language broadcasting, including

S4C ¹

211. Screen Scotland did not have a view on funding mechanisms but believed that the BBC should remain universal to access. It also called for greater transparency on how the BBC's commercial income is used to support the delivery of its public service obligations in Scotland. In terms of the overall level of funding, the view was that falling income "inhibits delivery of the BBC's public service purposes" and "undermines the UK's competitiveness in the global creative economy". ⁷
212. Glasgow University Media Group said that new models should be explored and "the principle of universality has been undermined in the digital era". People were engaging with BBC content "without realising that they need a TV licence" and this was "only going to get worse as the moves to online content via platforms increases". It was necessary "to rethink the current model" and there were lessons from "more hybrid systems of funding to meet the needs of the current climate" e.g., "Denmark supports its media through taxation for direct subsidies, indirect subsidies, and investment in public service media." ⁵
213. Continuation of the licence fee "as the primary means of funding" was the "least worst option" favoured by Professor Beveridge. He suggested that a "UKwide independent body" could determine the fee and the UK Government should fund the World Service. ³³ BECTU suggested that the licence fee settlements of recent years have "severely and negatively affected the BBC's programme making and commissioning capacity across the UK". It wanted the Scottish Government to "press the UK Government to support a realistic licence fee as the best model for PSB provision" and "to maintain independence from political or commercial pressures". Any approach reliant on advertising or subscriptions risked "undermining universal access and the production of distinctive UK content". ¹⁵ The NUJ similarly argued that the funding model must support universal access and the funding "must be sufficient to deliver quality public service broadcasting throughout the nations and regions". It was also opposed to greater use of the commercial arms of the BBC and supported the licence fee model—
- ” There must be meaningful, sustained increases to the licence fee that ends salami slicing cuts, protects against political interference, and prioritises quality local, regional, national and international news provision. ¹⁶
214. Professor Happer said that increasingly there was a sense of the need "to move away from the licence fee structure" because it was "delivering reduced revenue, it is an unpopular funding model and it is regressive". In recent years other European countries such as Germany and Denmark have switched to "either general taxation or household levies". It might be "politically contentious" when in the past "political opponents of the BBC would say, 'Get rid of the licence fee,' when what they really meant was that they wanted to get rid of the BBC". More recently, however—
- ” The thinking and the research are moving in a particular direction. To continue to rely on the licence fee puts public service media at risk. ⁶
215. She suggested "questions of politicisation" brought us back to the funding model. The BBC was "not looking like a self-confident institution right now" but the financial structures were not there "that would enable it to be one". The licence fee was

“delivering reduced revenue” and “we must look at the funding structure again” because “the settlement has to be more generous if we really want the BBC to do all of the things that we want it to do”.⁶

216. BBC Scotland estimated that a subscription bundle “including everything the BBC offers (advertising-free video, audio, and news media)” would amount to “£624 a year” whereas “the current licence fee costs £174.50”. It believed that the current model required “modernisation and reform” so as to—

1. Provide significant and sustainable public funding
2. Deliver fair value for audiences
3. Secure all the benefits of a universal public service BBC of scale for the long term⁴⁰

217. The broadcaster did not “support advertising on our services and we also do not believe in subscription”⁹ arguing that—

” “One option potentially damages the sector, and the other puts your public content behind a wall. If you are a universal service, you should not be behind a wall.”⁹

218. The Scottish Government welcomed “the exploration of funding models” and agreed that “ensuring the BBC’s sustainable funding” would enable “its crucial role in driving the growth of the creative industries in the UK”. The fact that the BBC was the only PSB for which there is a licence fee gave the Cabinet Secretary “a particular interest” in ensuring the broadcaster is “everything that it could and should be.”²⁸ The Scottish Government would “continue to stress that any approach to funding must take account of minority language broadcasting equitably across the UK” which in its view “has not been the case to date” and made the case that—

” Scotland requires a fairer share of commissioning power, investment, and visibility within UK-wide broadcasting.”²¹

219. **The Committee believes that the outcomes of the Charter Review process should be to provide sustainable public funding, to deliver value for Scottish audiences, and to ensure the longevity and universal benefits of the BBC. We therefore support—**

- **An adventurous, adaptable and accountable BBC**
- **Exploring whether licence fee concessions should be updated**
- **Exploring options for fairer collection and enforcement**
- **Exploring options for sustainably funding the BBC World Service**
- **Exploring the merits or otherwise of the more hybrid funding models adopted by Germany and Denmark**

- **Greater transparency in how the BBC's commercial income is used in delivery of its public service broadcast obligations**
- **Sustainable funding for minority language broadcasting across the UK, including Gaelic through BBC ALBA**

220. **The Committee is also required to scrutinise the overall spend of the BBC in Scotland. The BBC's annual report includes details of spending in each of the UK's nations. However, in the annual report covering 2024-25⁴³ this spend accounted for around 75% of total licence income. The BBC also receives income from commercial operations and told our predecessor committee that the spend not identified against any of the four nations will include funding for services such as the World Service and sports rights.⁴⁹ In the interests of parliamentary scrutiny, we ask the BBC to detail how this significant portion of the expenditure of the BBC is supporting audiences and economic growth in Scotland.**

Gaelic

221. Issues covered below include: support for minority language broadcasting; the funding gap between Gaelic and Welsh language broadcasting; the GVA of a stronger MG ALBA; comparisons with the status of TG4 and S4C; the Green Paper's consideration of options to provide "more certainty" over MG ALBA's funding and address "structural disadvantages"; MG ALBA's recommendations including parity of esteem for Gaelic and Welsh language services; and the Scottish Government's view that Gaelic broadcasting is not receiving the recognition that it is due.
222. The current Charter requires the BBC to support regional and minority languages through partnerships with organisations such as MG ALBA and the Green Papers notes that BBC ALBA provides "a daily presence for the Gaelic language". The Charter Review "will explore the potential for new regulations or bilateral frameworks" to further "support minority language broadcasting" and—
- ” that could include more explicitly defining the BBC's commitment to minority language communities or adapting how the BBC is made to partner with existing minority language broadcasters.¹
223. MG ALBA calculated that "the funding gap between Gaelic and Welsh language broadcasting has now risen to £100m each year" but felt the argument for more investment was strengthened by the Scottish Languages Act 2025's recognition of Gaelic as "an official language of Scotland". A consultancy report by EY found that MG ALBA contributed GVA of "around £18.2 million" and that a stronger MG ALBA could amplify "the value of the investment by 137%".⁵⁰
224. Unlike other minority language broadcasters – the Welsh-language S4C or Irish-

language TG4 – BBC ALBA “lacks a statutory basis” and was “officially treated as a BBC portfolio service”. This meant that it was “treated as a niche interest” or “at risk genre” and not “a necessary PSB service”, a “lack of status” resulting in “uncertain funding and unclear accountability”. Another difference was that Welsh and Irish speakers were “able to directly access their language services S4C and TG4” whereas Gaelic speakers “must first access the BBC iPlayer app and then navigate further to find Gaelic content”. However, the Green Paper was “considering options for providing MG ALBA with more certainty over its funding as part of the Charter Review” and that process offered “the best opportunity to address the structural disadvantages faced by Gaelic broadcasting”.⁵⁰

225. MG ALBA recommended that—

- The new BBC Charter should give parity of esteem to Welsh and Gaelic language services
- The new BBC Charter should recognise the unique status of BBC ALBA as a Gaelic language partnership service
- The funding arrangements should include a mechanism to provide sufficient funding to BBC ALBA in the same way that it does for S4C
- The new BBC Charter or Ofcom should ensure appropriate prominence for BBC ALBA in the digital domain and availability overseas.⁵⁰

226. The Cabinet Secretary also made the point that there was “no parity of esteem between the indigenous languages of Wales and Scotland” in the Charter’s Terms of Reference. This was “to the detriment of Gaelic speakers in Scotland” and all non-speakers who would “wish it to be properly served”. He found it inexplicable that the Scottish Government’s suggestion of parity of esteem had not been adopted.²⁸

227. The Scottish Government funded MG ALBA directly and was “committed to strengthening BBC ALBA and BBC Radio nan Gàidheal”, judging Gaelic broadcasting as crucial for the language’s “visibility and long-term sustainability”. Seeking “a fuller acknowledgment of the specific needs and challenges facing Gaelic broadcasting”, the Scottish Government wanted “to secure a resilient, visible, and well-supported Gaelic broadcasting environment” and would respond to the Green Paper with the approach that—

- ” Gaelic broadcasting is critically important, however our view is that it does not currently receive the recognition it deserves, including its omission from the Terms of Reference for the BBC Charter Review.²¹

228. The Committee recommends that new BBC Charter give parity of esteem to Welsh and Gaelic language services as well as recognising the unique status of BBC ALBA as a Gaelic language partnership service.

Annex A - Extracts from meeting minutes

[Constitution, Europe, External Affairs and Culture Committee - meeting minutes - 1st meeting 2026 - Thursday 8 January 2026](#)

Scottish Broadcasting:

The Committee took evidence from—

- Professor Robert Beveridge, Former Professor, University of Sassari;
- Professor Catherine Happer, Professor of Media Sociology, University of Glasgow;
- Professor Nicholas Higgins, Director of the Creative Media Academy, University of the West of Scotland;

and then from—

- John McLellan, Director, Newsbrands Scotland;
- Nick McGowan-Lowe, National Organiser for Scotland, National Union of Journalists;
- Catherine Houlihan, Managing Editor, ITV Border.

[Constitution, Europe, External Affairs and Culture Committee - meeting minutes - 2nd meeting 2026 - Thursday 15 January 2026](#)

Scottish Broadcasting:

The Committee took evidence from—

- David Smith, Director of Screen, Screen Scotland;
- Paul McManus, Scotland Negotiations Officer , BECTU;
- Emily Oyama, Director of Policy, Producers Alliance for Cinema and Television.

STV News consultation and Scottish Broadcasting inquiry:

The Committee took evidence from—

- Cristina Nicolotti Squires, Group Director, Broadcasting and Media Group, Glenn Preston, Director, Scotland and Stefan Webster, Regulatory Affairs Manager, Ofcom .

[Constitution, Europe, External Affairs and Culture Committee - meeting minutes - 3rd meeting 2026 - Thursday 22 January 2026](#)

Scottish Broadcasting, BBC Charter Renewal and BBC Annual Report:

The Committee took evidence from—

- Hayley Valentine, Director and Louise Thornton, Head of Multiplatform Commissioning, BBC Scotland;

- Luke McCullough, Corporate Affairs Director, Nations and Rhona Burns, Finance Director: Financial Planning & Insight, BBC.

[Constitution, Europe, External Affairs and Culture Committee - meeting minutes - 8th meeting 2026 - Thursday 26 February 2026](#)

Scottish Broadcasting:

The Committee took evidence from—

- Angus Robertson, Cabinet Secretary for Constitution, External Affairs and Culture, Jamie MacDougall, Deputy Director, Culture and Historic Environment and Emily Green, Head of Screen, Broadcasting and Print Media, Scottish Government.

[Constitution, Europe, External Affairs and Culture Committee - meeting minutes - 10th meeting 2026 - Thursday 12 March 2026](#)

Scottish Broadcasting inquiry (in private):

The Committee considered and agreed a draft report.

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