

Constitution, Europe, External Affairs and Culture Committee  
Thursday 22 January 2026  
3<sup>rd</sup> Meeting, 2026 (Session 6)

## Scottish Broadcasting, BBC Charter Renewal and BBC Annual Report

1. The Committee is continuing its short and general [inquiry on Scottish Broadcasting](#) which will also inform its input to the [UK Government's consultation](#) on the BBC Charter renewal.
2. [The two panels on 8 January](#) focused on the perspectives of those representing news / journalism and academics. On 15 January, the papers for which can be found [here](#), we heard from Ofcom and a panel representing production and skills
3. This week we will be taking evidence from the BBC with—
  - Hayley Valentine, Director, BBC Scotland
  - Louise Thornton, Head of Multiplatform Commissioning, BBC Scotland
  - Luke McCullough, Corporate Affairs Director, Nations, BBC
  - Rhona Burns, Finance Director: Financial Planning & Insight, BBC
4. After this week, we will hold one further evidence session on 19 February (with the Scottish Government) with the aim of publishing a report and responding to the consultation on the UK Government's green paper on the BBC Charter renewal. The Committee will also highlight this work in our legacy paper with a view to informing scrutiny of the BBC Charter renewal in Session 7.
5. A SPICe briefing can be found at **Annexes A**.

**Clerks, January 2026**

## Annexe A

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# Broadcasting inquiry and informing the BBC Charter & Framework renewal, and BBC Annual Report and Accounts

## Background

The Committee is currently undertaking an inquiry into the broadcasting sector in Scotland in the context of the current process around the renewal process for the BBC Charter and Framework document.

In the past several years, the BBC has also attended the Committee to discuss its annual accounts of the previous financial year. Given the timing, this paper focuses more on the issues arising from the Committee's inquiry and Charter renewal.

This will be the penultimate session on the inquiry into broadcasting. The Committee is due to take evidence from the Cabinet Secretary on the inquiry next month.

The [BBC's most recent annual report and accounts](#) cover the year 2024/25 and were published in July 2025. Ofcom regulate the activities of the BBC. It also produces an annual report on the BBC following the publication of the BBC's annual reports. The most recent was [published in November 2025 and also referred to 2024/25 financial year](#).

## BBC Charter and Framework Renewal

On 16 December 2025, the Department for Culture Media and Sport ("DCMS") published [Britain's Story: The Next Chapter - the BBC Royal Charter Review](#), a Green Paper and public consultation on the charter renewal process. There is a role for the Scottish Government and Scottish Parliament in this process.

The BBC is constituted through a Royal Charter. The current BBC Charter began on 1 January 2017 and ends on 31 December 2027.

In previous charter renewals the UK Government has also published a framework agreement. These two documents form key parts of the governance of the BBC. The BBC is also regulated by Ofcom through its licensing regime and there are a number of statutory duties in relation to the output of the BBC (and other broadcasters). It is important to note, therefore, that the Charter is high level and is not the totality of how the BBC is regulated.

[DCMS also published terms of reference for the Charter review](#). This stated that the Charter Review process will "take evidence on and consider measures that support the following objectives", there are headline objectives with sub-objectives. The list

below shows the headline objectives and selected sub-objectives of particular relevance to the devolved context:

- A BBC that is sustainably funded for decades to come to support its vital public service role;
- A BBC that commands the public's trust, is independent and accountable to the public it serves, and represents all communities across the UK [including]
  - Ensuring the BBC supports diversity in its workforce and tells a unifying national story, as well as being accessible and responsive to serving the diversity of all communities across the UK, including those in the nations and regions and through minority language broadcasting.
- A BBC that drives growth, opportunity and good jobs across the nations and regions of the UK, working in partnership with others;
  - Identifying how the BBC can further support the wider media and creative sectors in line with the government's Industrial Strategy, including by working with independent producers, developing partnerships and skills and training initiatives.
  - Reviewing how the BBC prioritises delivering its public services and strikes the appropriate balance in terms of commercial impact in the markets in which it operates and supports media plurality, including in the local media ecosystem.
  - Exploring how the BBC can act as a driving force in technology and innovation for the benefit of the wider creative economy and public good, supporting social cohesion and digital inclusion.

The Green Paper was structured around four chapters:

- A trusted institution – how to improve public trust in the BBC
- Delivering services for the public good – how to “futureproof the BBC ... enhancing its digital capabilities, providing a counterpoint to false narratives and disinformation, and ensuring it has the highest editorial standards”
- Driving growth across the UK
- Sustainable and fair funding

In her foreword to the Green Paper, Lisa Nandy MP, the Secretary of State for Culture Media and Sport said—

“Our vision is for a BBC that is trusted, loved and belongs to us all, providing those shared spaces and places that have become so rare and so precious in recent decades. Sustainably funded, with a strong presence in every nation and region so that all of us can see ourselves reflected in our national story. A broadcaster known for its unique strengths, from the highest quality children's

programmes to impartial and trusted news and documentaries, the world over.”

The Green Paper also noted that the charter renewal process would sit alongside wider policy development for TV distribution and a framework for public service broadcasters/media. (p9)

## *Role for the Scottish Parliament and Scottish Government*

The Scottish Parliament, along with the Scottish Government, has a formal consultative role in the process of reviewing the BBC charter. The [Smith Commission](#) requires that the following happens:

- DCMS consult the Scottish Government on the draft terms of reference for the Charter Review in advance of their publication
- DCMS consult the Scottish Government throughout the process of reviewing the Charter
- The Scottish Government lay the draft Charter and Framework Agreement before the Scottish Parliament and the Scottish Parliament can do a ‘take note’ debate on the content
- DCMS consult the Scottish Government before recommending to His Majesty in Council that the draft Charter is granted

During the last Charter renewal process, the Education and Culture Committee (which had the culture remit in Session 4) conducted an [inquiry on BBC charter renewal](#) from December 2015-February 2016. After the election in 2016, the then Culture, Tourism, Europe and External Affairs Committee also took evidence on the [Draft Royal Charter for the Continuance of the BBC](#). The Draft Royal Charter and Framework Agreement was debated in the Scottish Parliament on [6 October 2016](#).

The BBC has already undertaken a consultation with the aim of informing the Charter renewal process. [Our BBC, Our Future published its results in October 2025](#), sharing the views of the 872,701 respondents. Two priority areas that the consultation identified were ensuring that the BBC “is effective in reflecting different parts of the UK and the lives of those who live there” and “is effective in being independent from the government of the day.”

## **Strategy and purpose of PSBs**

Ofcom has produced several reports on the future of public service broadcasters and, more broadly, public service media. The most recent, [Transmission Critical: The future of Public Service Media](#) was published in July 2025. This said—

“The UK media landscape is undergoing rapid transformation. Traditional broadcasters are in a fierce battle for audience attention, while global tech giants flood the market with an ever-growing range of content. These

pressures are not unique to the UK. Services like Netflix and YouTube offer hyper-personalised experiences that are hugely popular with viewers and advertisers. Algorithms, tailored recommendations and instant accessibility are reshaping how a growing number of audiences discover and consume media. Emerging technologies, such as generative artificial intelligence (“GenAI”), are revolutionising how content is created, distributed and consumed. These seismic shifts are well underway and the next few years will be critical in determining the future of UK broadcasting.”

In March 2024 the BBC published ‘[A BBC for the future](#). It sets out three priorities for the future of the organisation:

- Pursue truth with no agenda by reporting fearlessly and fairly
- Back the best British storytelling by investing in homegrown talent and creativity
- Bring people together by connecting everyone to unmissable content.

The BBC produces an [Annual Plan](#) which sets out the challenges and plans for the current year and beyond.

The strategic priorities for the current year are broadly similar to those for the previous year:

- Pursue truth with no agenda by reporting fearlessly and fairly
- Back the best British storytelling by investing in homegrown talent and creativity
- Bring people together by connecting everyone to unmissable content
- The BBC’s business and organisational focus

The annual plan includes the following commitments relating to Scotland:

- “We will commission and broadcast on BBC One, BBC Two, BBC Three, CBeebies and CBBC about 90 hours of high-impact content representing and portraying audiences in Scotland.” (p.80)
- “Across BBC One Scotland and BBC Scotland we will broadcast about 2,540 hours of programming representing, portraying and serving Scottish audiences. Of this about 1,110 hours will be first-run. All these programmes will also be available across the UK and easily discoverable on BBC iPlayer.” (p.84)
- “We will broadcast about 345 hours of Scottish news programming on BBC One Scotland and about 150 hours of Scottish news on BBC Scotland.” (p.84)

In March 2021, the BBC published [The BBC Across the UK](#). This set the BBC’s plans to move more of its services and output away from London and the South

East. In Scotland, the BBC has made a range of commitments to improve representation and investment, and to develop new talent.

- The BBC will increase its operations in Glasgow, physically expanding its BBC Studios bases as well as moving the Technology reporting team there.
- The BBC will double the number of nations' co-commissions, including those from Scotland, which appear on UK-wide channels.
- Over the next three years more than a hundred drama and comedy titles will reflect the lives and communities of audiences outside London, of which at least 20 will portray Scotland, Wales or Northern Ireland.
- As well as renewing its partnership with Screen Scotland (see the section below), the BBC committed to modernising the BBC/MG ALBA partnership and developing BBC ALBA and BBC Radio nan Gàidheal services to increase their digital impact.

In each of its sessions the Committee has explored with panels what they consider a future BBC should look like to deliver for the people of Scotland. Last week, David Smith from Screen Scotland said that his organisations would like to see the PSBs in Scotland:

- Provide an economic contribution
- Supporting creative originations from Scotland
- Developing audiences for content from Scotland

## *Greater autonomy for BBC Scotland*

[On 8 January 2026](#), the Committee took evidence from a panel of academics and one of the themes of that discussion was around the view that the BBC remains a London-centric organisation and that BBC Scotland is not sufficiently autonomous to reflect the culture and politics in Scotland.

Professor Beveridge suggested that BBC Scotland should have control over the schedules of BBC1 in Scotland. (Col 6) Professor Higgins also suggested that BBC Scotland should have more say over its own affairs, he said—

“BBC Scotland could do more and be more ambitious, and that it should have a greater budget to do that. It should be a sector leader on skills and development, and it should be a catalyst for the whole media ecosystem. My worry is that, at the moment, BBC Scotland is in many ways too insular and does not have enough relationships and activities with other stakeholders in the media ecosystem.”

In relation to news provision, Professor Happer suggested that while falling trust in traditional media is a worldwide phenomenon, there is a particular Scottish aspect to this. She said that “the independence referendum period showed BBC Scotland’s

inability to be autonomous in its coverage of its own affairs, because there was a clear perception among audiences that a lot of the control came from the BBC network and BBC London.” While she said that this may not be a wholly fair interpretation, she continued, “the more that BBC Scotland and its journalism can be independent from London and politicians in both Westminster and Holyrood, the better.” (cols 8-9)

Screen Scotland’s submission said—

“We would hope the next charter would provide for effective governance of the BBC from across the UK, with representatives from each home nation on the main board and strong/diverse/informed nations-based subcommittees/boards in each home nation.”

### Commissioning

The extent to which the BBC in Scotland has commissioners who have the authority to commission network programmes has been a theme of discussions between Committees of this Parliament and the BBC over the years. The Green Paper said—

“One area we are looking at is requiring the BBC to move more commissioning and budgetary decision-making powers outside of London. This is something that the BBC are already striving for through their Across the UK strategy.”

In May 2025, [Hayley Valentine told the Committee](#):

“We have 14 commissioners based in Scotland; that is a combination of commissioners who work directly for me, commissioners who work for network looking for Scottish ideas that we can co-commission together, such as “Shetland”, and commissioners who work for our Gaelic services.”

There appears to have been a shift in PSB’s commissioning more broadly in response to changing viewing habits. In [2024 Screen Scotland published research it had commissioned on production from and in Scotland between 2003 and 2023](#).

This also looked at recent trends and

“The decrease in commissioning activity from the PSBs, particularly the BBC’s reduction in originated hours and Channel 4’s recent commissioning freeze, is coming together with a wider industry trend of polarisation in content spend, where content commissioners reprioritise spend to fewer high value originations plus lower budget content. This could affect Scotland to a greater degree than other parts of the UK to the extent that it is recognised as a leading producer of daytime factual and factual entertainment genres for both the BBC and C4.”

### *License fee*

The Green Paper was not specific about the overall level of funding it envisages for the BBC; it said that the level of funding should match the ambitions DCMS has for the BBC. The Green Paper suggested that the BBC should continue to make

efficiency savings and to maximise its commercial income. It also said that DCMS will explore a range of options for BBC to sell advertising opportunities and to have some parts of the BBC's output behind a paywall.

The Green Paper framed the new options for revenue raising as being able to reduce the direct costs of funding the BBC on households, or at least some households. The Green Paper said that DCMS was not considering abolishing the licence fee. It said—

“As the licence fee is a tried and tested public funding model, we are not considering replacing it with alternative forms of public funding, such as a new tax on households, funding through general taxation, or introducing a levy on the revenues of streaming services to fund the BBC.”

The Green Paper also said that DCMS will consider how the World Service is funded as well as S4C and MG Alba.

Professor Happer said that there is potentially an issue with younger people's attitudes to buying a license fee. She said that younger people in her research do not see the license fee as something they are going to buy – one issue she highlighted was the branding as a “TV Licence” and young people do not necessarily watch broadcast TV. (cols 9-10)

Professor Beveridge said that there should be efforts to better explain the purpose of the licence fee to “convince or persuade people that Public Service Broadcasting is a cultural health service.” (col 13) This view was echoed by other witnesses such as Paul McManus from BECTU.

Witnesses have expressed different views as to whether the licence fee should be retained. David Smith from Screen Scotland said last week that the BBC should be universal and should be well funded, but beyond that, Screen Scotland did not have a position. This is similar to the BBC's position. In [a letter to the House of Lords Communications Committee in 2022](#), Tim Davie said that the question of funding should follow consideration of “the future of the BBC and how it delivers for UK audiences”. He said that the BBC said the funding model should meet five tests:

- Does it deliver the Mission?
- Does it safeguard impartiality and independence?
- Does it provide a sustainable financial model?
- Does it help the creative economy grow?
- Does it deliver fair value for audiences?

[On 25 December 2025, the House of Commons' Library published a useful briefing on options for funding the BBC.](#)

[The latest annual accounts for the BBC](#) show that the total income for the group in 2024/25 was £5.9bn. Of this, £3.8bn was licence fee income and £2.1bn was from

other income, such as from its commercial activities, primarily BBC Studios. This reflects a 5% increase in licence fees compared to 2023/24 and an increase in commercial income of just over £0.3bn. The accounts explained that the increase in licence fee income was due to CPI inflation of 6.7% from April 2024 which was partially offset by a 1% decline in total licences. Operating costs were around £6bn and there was an operating deficit of £132m in 2024/25, compared to a deficit of £263m in 2023/24. (p.61)

The value of licence fee income in Scotland rose by 4.7% to £311m in 2024/25. The BBC's annual report also sets out the spend relating to programmes produced in Scotland, including network TV spend, radio, the BBC Scottish Symphony Orchestra, and distribution.

The total spend identified in Scotland was £269m in 2024/25. This is around 86% of the total licence fee income in Scotland. It is worth noting that there are certain costs that are not identified against any of the four nations' spend – such as extra-territorial spend (e.g., World Service). Summing the spend identified against each nation comes to around 75% of licence fee income in 2024-25. The percentage of the licence fee income collected in other nations shown as being spent in those nations are: Wales, 115%; Northern Ireland, 97%, England, 71%. Licence fee income forms the majority of the BBC Group income. The commercial operations of the BBC also make a contribution to the overall finances of the BBC as well as the licence fee. These complications make it difficult to assess whether the BBC in Scotland and Scottish licence payers are receiving a 'fair share' of the total resource available to the BBC.

## *Meeting audiences where they are*

A key question and challenge facing the broadcasting sector is how it adapts to changing consumption habits.

There have been regulatory developments, for example the Media Act 2024 provided for a new online availability and prominence regime for PSB TV apps. This will require platforms designated by the Secretary of State to ensure that certain PSB TV apps are available, prominent, and easily accessible.

Last week David Smith from Screen Scotland said that it was making its first steps into supporting content-makers in the online space, e.g., YouTube. He said that in order to compete in the changing market, PSBs should:

- Make compelling content
- Deliver it where the audience is; and
- Make sure it is prominent.

Professor Higgins said that there are some good examples of the BBC using different platforms to help audiences find its content. He said:

“The great lesson from “The Traitors” ... was that people were watching it, and they were doing so because it was being promoted on TikTok and across

a variety of social media. The BBC was smart and was at the top of its game in bringing the audience to that programme. It is a good programme, but the point is that the BBC put in the effort.” (8 January 2026, col 15)

The Green Paper addressed this point as well. It said:

“We need to consider where the BBC offers its content. Currently, the BBC primarily shares clips of its best moments on social media and video sharing platforms with the aim of attracting new audiences and bringing them to the BBC’s own platforms. This has some advantages - BBC iPlayer and BBC Sounds are closed and safe ecosystems built around the BBC’s Mission to inform, educate and entertain, while other platforms have no such commitment. But as platforms like YouTube become increasingly important in mediating access to content, we need to ask whether the BBC’s current approach is right for all audiences, or if further expansion in its use of third party platforms could bring audiences (and the organisation itself) additional benefits. ... This issue is especially important for younger audiences who use the BBC’s platforms less and are therefore at risk of missing out on its crucial public service programming.

“However, this issue is a complicated one. In particular, the BBC’s ability to effectively serve different audiences across both traditional and online platforms is constrained by its income. It will become increasingly challenging to cover the costs of running multiple distribution platforms, demanding greater investment in distribution rather than in commissioning content for audiences. The government’s broader and longer term work to support public service media will further consider how the BBC and other public service media content is distributed in a way that best reaches audiences.”

At the time of writing, the Financial Times was reporting that the BBC has entered into an agreement with YouTube on sharing content. There may have been more details released by the time of the Committee meeting.

## News provision

A key element of the inquiry is the BBC’s news provision within a changing media landscape. At a UK level, Ofcom reported that:

“While online news consumption (70%) is on a par with watching news on TV, including on-demand (68%), it is significantly higher than linear broadcast TV channels (63%). Social media is a significant element of online news consumption and half of UK adults (51%) now use it as a source of news. Television (including on-demand) as a source of news skews towards an older demographic, with 90% of those aged 75 and over using it, compared to 52% of young people aged 16-24. The reverse is seen in the use of online for news – 81% of 16-24s are using online services, compared to only 37% of adults aged 75 and over. Just under four in ten people use the radio for news, and about one in five adults say they get news from a printed newspaper. In both cases, this is highest among older age groups.” (Media Nations UK 2025)

The BBC has the highest reach across all of its platforms (e.g., TV, radio, online). [Ofcom's News Consumption Survey 2025](#) found that the BBC reached 67% of adults. In Scotland this was slightly lower: 64% of adults.

Ofcom is responsible for holding the BBC to account on behalf of audiences for delivering its remit. It publishes an annual report on the BBC detailing its performance against the regulatory conditions. The most recent report was published in [November 2025](#) and referred to 2024/25 financial year. One of its findings was:

“In the face of a fragmented and increasingly polarised media landscape, our research shows the BBC has remained a trusted source of news and the UK's most used news source.”

The BBC funds around 165 [local democracy reporters](#) across the UK. These reporters are funded by the BBC but employed by local or regional news organisations. The purpose of the scheme is to “provide impartial coverage of the regular business and workings of local authorities in the UK, and other relevant democratic institutions”.

On 8 January, Professor Happer warned that news consumption risks becoming a two-tier market; she said—

“If you look at the figures, you will see that older, more educated and higher-income groups are consuming the BBC, including BBC broadcast news. However, the BBC is not serving younger and lower-income groups quite so well, as was highlighted in relation to underprivileged.” (Col 9)

She also said that her research suggests that there is a “perception that the agenda flows from Governments and politicians through to journalist” and that this agenda is “seen as very narrow and does not engage with the issues that the public cares about, with a very narrow set of questions being put to politicians.” (Col 9)

Professor Happer said that public sector media providers' role in news has become more important as people have become unsure of where to turn to for trustworthy information. (Col 24) Ofcom produced research in February 2025 on the [relationship between the use of PSBs for news and societal outcomes](#). This found:

“Compared to survey participants who do not use PSBs for news, survey participants who use PSBs for news are more knowledgeable about news facts, have higher levels of trust in institutions and are more likely to have voted in the 2019 general election. They also tend to be less polarised than survey participants who do not use PSBs. Importantly, our analysis controls for the possible use by survey participants of a comprehensive set of alternative news sources, including: commercial TV and radio stations; offline news sources (i.e. newspapers and magazines); social media (such as X, formerly Twitter, and Facebook); and any other online source (such as search engines and news aggregators).”

The Committee received a submission from the Glasgow University Media Group. This included a number of recommendations for what the BBC should seek to deliver in Scotland in the future. In relation to news, these were:

- 1) 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.
- 2) 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.
- 3) 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.
- 4) 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.
- 5) 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.

In relation to news, the Green Paper explored two aspects. The first was around ensuring that BBC news is “trusted, impartial and accurate”. The text of the Green Paper said that it was consulting on whether to update the mission to “give accuracy equal importance to impartiality”, although the consultation questions do not make this explicit. The Green Paper also explored how decision-making processes would be more transparent and how the BBC would engage with audiences to ensure that its news is “accessible and reflective of the public”. The second aspect of news production the Green Paper addressed was the BBC’s role in countering misinformation and disinformation. In terms of local news, the Green Paper suggested that “the priority is to ensure the BBC complements high quality local providers, instead of displacing them, so the public can benefit from a thriving and diverse local news market.” John McLellen from Newsbrands Scotland said to the Committee on 8 January 2026—

“The on-going problem, which has come and gone over the years, is the extent to which the BBC extends what it does and what the limits of its remit should be in the ways that it can serve its listeners and viewers to honour the licence fee but without distorting the commercial markets that already exist.”  
(col 38)

A criticism of the BBC has been that the UK-level news does not adequately reflect the different nations’ policy and political differences. On 8 January 2026, the Committee took evidence from Catherine Houlihan from ITV Borders whose region covers both parts of Scotland and the north of England. She said—

“It is not as hard as you might think to cater to those two audiences. In ITV Border, it is now routine to say in a report, “This applies in Scotland”, “These changes don’t apply in England”, or “This is only relevant to England”. That was thrown into sharp focus during the Covid-19 pandemic, when we had reports with graphics telling people what they could do if they were in Scotland, what they could do if they were in England, and what the different rules were. It is our job to make things simple, easy to understand and engaging for the viewer to watch. It would not be right to say that we find that easy, but it is not as difficult as you might think. We accept that that is the situation and we cater to both audiences. It is not just about reserved matters, because, for example, the court systems are different. We are used to saying what applies to people north of the border and what applies to people south of the border, and it is not very difficult to do. It is quite easy to achieve.” (col 43)

## Recent questions over impartiality

On 9 November 2025, BBC director general Tim Davie and CEO of News Deborah Turness announced their resignations. BBC chair Samir Shah also released a statement in response. Their [resignation letters and the statement from the Chair have been published in full](#). The resignations came after former adviser to the corporation, Michael Prescott, accused it of “serious and systemic” bias in its coverage of issues including Donald Trump, Gaza and trans rights. BBC chair Samir Shah [wrote to the House of Commons Culture, Media and Sport Committee on 10 November 2025](#) to:

“put on record the BBC’s position on a number of issues that have been raised in the last week following the leak of a letter to the BBC Board from Michael Prescott.”

The letter includes the full text of Mr Prescott’s original letter.

The [Ofcom report on the BBC for 2024/25](#), published at the end of November 2025, included the following comments on the topic of the resignations:

“This report is being published at a time when the BBC has been facing another significant crisis involving editorial decision-making at the heart of its news and current affairs output. This has led to the resignation of its Director General and CEO of BBC News and Current Affairs. In response, the BBC Chair has outlined the importance of upholding the highest standards in the BBC’s output and that it will continue to take necessary action to retain the trust and confidence of the public. He also announced the BBC’s commitment to ‘sharpen and strengthen’ the processes of the Editorial Guidelines and Standards Committee, a subcommittee of the BBC Board. Ofcom has publicly stated that the BBC Board and Executive must take a firmer grip when things go wrong, and to act swiftly and transparently when controversies arise. This is critical to upholding and maintaining audience trust and must now be the focus for how the BBC resets to deliver for its audiences.”

[The BBC’s editorial guidelines state:](#)

“Impartiality is fundamental to the BBC's purpose and is enshrined in the BBC's Charter. It means not favouring one side over another and reflecting all relevant sides of the debate. It means not taking sides, reflecting all relevant strands of public debate and challenging them with consistent rigour. Impartiality is key to a relationship of trust with audiences, that they know the BBC is not being influenced by any personal or other agenda in what it chooses to broadcast or publish or in how it covers stories and that it seeks to include a wide range of views on any given topic.

“The BBC is committed to achieving due impartiality in all its output. The term 'due impartiality' means adequate and appropriate to the output, taking account of the subject and nature of the content, the likely audience expectation, and any signposting that may influence that expectation.”

## Production

There has been a long-standing concern that too much TV (and film) production is concentrated within the M25. [Ofcom sets out the rules](#) for how a programme's geographic allocation is determined. These rules are complex, but, in brief, since 2021 three criterion are used to determine the nation/region allocation:

- Substantive base - The production company must have a substantive business and production base in the UK outside the M25. The production in question must be managed from that substantive base.
- Production spend - At least 70% of the production spend must be spent in the UK outside the M25.
- Off-screen talent - At least 50% of the production talent (i.e. not on-screen talent) by cost must have their usual place of employment in the UK outside the M25.

Generally, which nation or region a production is allocated to, is determined if at least two out of three criteria apply. Where each of the criteria have a different location and the substantive base is outside of London, that criteria would be used to determine the allocation (this is what happened in the case of *The Traitors* which attracted some debate last year).

The regional production quotas only apply to first-run programmes on the main networks which are made within the UK and exclude news. Different broadcasters have different quotas. The BBC is required to ensure that 8% of spend and broadcast hours is Scottish. Channel 4 has an out of England quota of 9% of spend and hours and this will increase to 12% from 2030. ITV/STV and Channel 5 have quotas for programming outside the M25 which are 35% and 10% respectively.

[Screen Scotland's report](#), prepared by Oliver & Ohlbaum and published in late 2024, assesses the trends in the production sector in Scotland. This found that Scotland's TV production sector has grown steadily since 2003 and that the BBC and Channel 4 are key in the commissioning of productions. It also noted that most of the production sector in Scotland is centred in Glasgow. The report also found that:

“Producers with a Scottish HQ won more such PSB Network commissions than producers with a branch office in Scotland in 2022 (42 titles compared to 24). However, this represented fewer hours (267 hours compared to 534 hours). Much of the difference in hours is due to commissions for sports coverage (notably the snooker and bowls coverage mentioned above), plus some entertainment strands, which had a high volume of hours per title.”

Screen Scotland’s strategy to 2030-31 also highlighted some actions in relation to supporting TV production and how rules around out of London programming support this. It said Screen Scotland 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.

On 8 January 2026, Professor Higgins said, “there is a real concern that the criteria that allow for something to qualify as Scottish are not necessarily being followed sufficiently rigorously”. (Col 35)

The Committee took evidence from Ofcom on [29 May 2025](#). When asked about the geographical allocation criteria, Glenn Preston explained that:

“The guidance is complex—I make no bones about that—but it is drawn in that way because the sector is quite complex. The funding arrangements are very complex, so the guidance involves a lot of nuance. We try to create guidance that is as flexible as possible, that responds to the complexity of the sector and that encourages people to invest and make things in Scotland, but we also want to allow Scottish companies to invest in other parts of the UK while still being able to qualify as a Scottish production.”

The last time the BBC were in to discuss their annual accounts was [23 January 2025](#) when Tim Davie, director general of the BBC, Hayley Valentine, director of BBC Scotland and Rhona Burns, finance director, BBC financial planning and insight gave evidence. The Committee discussed the Traitors and the fact that it had qualified as “Scottish” on the basis that the substantive base was considered to be Scottish. Mr Davie said that he would not see meeting the quotas for Scottish productions through the substantive base criterion alone as being a success, rather that the aim was to ensure ‘Scottish’ productions met at least two of the criteria. He said—

“We absolutely want to build the Scottish base in the long term, but, to be blunt, we do not want people being disincentivised from coming to Scotland because they want to bring in a team to shoot something. We want to encourage them to do that. We then want to be held to account on how many productions are hitting at least two or three of the Ofcom criteria, and I would go beyond the Ofcom criteria because the requirement is only to be out of London. I would specify, “in Scotland”, and have a quota of 8 per cent. My view is that we should hit a target based on that, not just on technically ticking

one Ofcom box. We are really up for that. We want to build the Scottish production sector sustainably.”

In [a blog published in May 2025](#), Rhodri Talfan Davies, Director, BBC Nations said—

“We want to ... go beyond Ofcom’s industry-wide standard. In future, we will not typically commission a new network production regionally unless we are confident it will invest at least 70% of its production budget locally and/or draw significantly on local programme-makers and crew to produce the show. We will work closely with our partners in the independent sector to make sure we step through this approach carefully, recognising that some shows have very specific editorial, talent or production requirements. We will publish our progress in delivering this commitment each year. ...

“Delivering this change will take a little time – TV commissioning cycles can be as long as three years. But at a time of real challenge for many independent production companies and freelancers, we believe these changes will ensure we deliver the biggest possible creative, skills and economic impact right across the UK.”

Last week Emily Oyama from PACT said that the PSB regional and independent producers’ quotas, terms of trade and the BBC licence are crucial to the diversity of the independent production sector. Paul McManus from BECTU said that they want to see Scotland get its “fair share” of work and Scottish originating productions. He said that it is “too simplistic” to say that a company from England producing in Scotland is problematic, particularly if that creates opportunities for Scottish-based off-screen talent. [In January 2025 Haley Valentine told the Committee](#)—

“When my commissioning team and I look at a proposition, we consider whether it is fundamentally a good idea. Is it telling Scotland’s stories? Is it serving the Scottish sector? I want to grow the Scottish sector. For example, at the other extreme from Scottish-owned companies, we are working with an English production company. It has made several series of a programme in the south of England and is now making a series of that programme in Edinburgh and the Lothians. That company is hiring a large number of Scottish freelancers and, in my book, we are open for business—that is absolutely the right thing to do.”

Glenn Preston from Ofcom told the Committee last week that there are positive medium-term trends in production in Scotland. He said that there is a mix of global and local companies, and that key to that is the “well-developed” infrastructure, including studio space and skills. He also noted that in the past several years, there has been a slowdown in the past few years and inflationary pressures.

## Partnerships

The Green Paper said that DCMS would seek to encourage the BBC to “go further in leveraging its public funding to develop enhanced, mutually beneficial partnerships, both with public service media providers and other organisations.”

An [MoU between Screen Scotland and the BBC was agreed](#) in February 2019 which set out how together they intended “to build a sustainable television industry in Scotland and to improve the on-air representation and portrayal of Scotland and its people”. This was [renewed in December 2021](#), Screen Scotland’s submission provided an update:

“Screen Scotland has a long-standing, though evolving, relationship with the BBC. A formal Memorandum of Understanding between the BBC and Creative Scotland/Screen Scotland was in place from 2018 to the end of 2024. The BBC took the decision not to renew the MoU following the publication of the O&O report. Despite this, we continue to collaborate on production investment, skills development and education. Our shared aim is to support creative ambition, company sustainability and workforce development in Scotland.”

As noted above, Professor Higgins suggested that BBC Scotland could be more active in developing relationships with a range of stakeholders. He also said that the BBC in Scotland could consider supporting graduates’ screenings in Scotland. (Col 7)

## Previous BBC Committee Appearances

The BBC have attended a number of Committee meetings over the session in order to discuss various topics.

### *River City*

On [29 May 2025](#), Hayley Valentine, director of BBC Scotland, Luke McCullough, head of corporate affairs and Rhodri Talfan Davies, the BBC’s director of nations attended the Committee to give evidence about changes to the drama investment strategy. This included the decision to end the run of River City.

When asked about replacing the training opportunities in Scotland currently provided by the production of River City, Hayley Valentine told the Committee that:

“We have talked about the number of hours and training, and none of it is exactly like for like, of course. However, we are committed to creating quality opportunities to bring people into the industry, whether that is bringing in people in their first role on or off screen or bringing in people at mid-level, for example, shadow directing in a project that is bigger than they might have worked on before... I would be happy to come back to the committee in the autumn or whenever I am next asked when we should have more detail, because some of the projects will be up and running by then.”

### *Radio Scotland*

On [2 March 2023](#) Steve Carson, then director of BBC Scotland, and Louise Thornton, BBC Scotland’s head of commissioning gave evidence on the BBC’s digital-first agenda, and in particular several changes made to Radio Scotland’s Jazz and piping music programmes.

Editorial decisions around Radio Scotland have recently also attracted criticism. The BBC announced late in 2025 that it would change its late night line-up. This includes the removal of The Iain Anderson Show and Billy Sloan's show. The new schedule includes Up Late with Lynne Hoggan Monday to Thursday 10pm-12am and Up Late with Ashley Storrie on Friday's 10pm-12am. At the weekend the late evening slot is taken by Roddy Hart's Mixtape.

The [BBC's media release set out its rationale for these changes](#). It said:

- These schedule changes move Radio Scotland from the current position of six late night programmes and one repeat to seven individual programmes every week.
- The existing programmes are ending following a procurement process in which the current independent production companies making those shows did not bid for the work.
- Up Late with Lynne Hoggan and Up Late with Ashley Storrie will be produced by Silent Productions. Roddy Hart's Mixtape will be produced by BBC Scotland.
- These changes have been made against a backdrop of the fiercely competitive audio market within which some of the current programmes in the late-night slot achieve less than 2.5% of the market share.

The [Scottish Music Industry Association](#) issued an open letter following the announcement of these changes. This called on the BBC to

- Pause implementation of these changes and undertakes meaningful consultation with Scotland's music
- Sets out a clear strategy for how it will meet its public service obligation to represent, support and platform the full breadth of Scottish music – including emerging, independent and genre-diverse artists who rely on culturally rooted programming that cannot be replicated by mainstream or algorithmic formats.
- Commit to maintaining a distinct, nationally recognisable space within its schedule dedicated to Scottish music discovery and development, ensuring Scotland's diverse creative identity is not diluted through homogenised programming.

Professor Higgins told the Committee on 8 January 2026—

"The loss of the cultural knowledge around new and local music through the cancellation of the Billy Sloan show and the changes to the Roddy Hart show and the Iain Anderson show is really important. BBC Radio Scotland should not be trying to be a commercial radio station. You said that you want to hear Scottish voices, and that is one of the few platforms on which such music gets out to the world." (col 15)

The Committee has received a submission from The Tenementals, a Glasgow-based band made up of academics and musicians. That submission said that bands getting airplay was a crucial part of the progression of musicians. It argued:

“These new proposals mark a further retreat from having an engaged and active community of radio and music practitioners, meeting with bands and audiences within and outwith the studio itself. In these circumstances, the move to diminish new music is a step in the wrong direction.”

**Ned Sharratt and Laura Haley SPICe**

**Date: 16/1/2026**

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The Scottish Parliament, Edinburgh, EH99 1SP [www.parliament.scot](http://www.parliament.scot)