Constitution, Europe, External Affairs and Culture Committee
Thursday 15 January 2026
2nd Meeting, 2026 (Session 6)

Scottish broadcasting

1. The Committee is continuing its short and general inquiry on Scottish Broadcasting which will also inform its input to the consultation on the BBC Charter renewal.

2. The two panels last week focused on the perspectives of those representing news / journalism and academics.

3. This week we will be taking evidence from a panel representing production and skills—

    - David Smith, Director of Screen, Screen Scotland

    - Paul McManus, Scotland Negotiations Officer, BECTU

    - Emily Oyama, Director of Policy, PACT

4. A SPICe briefing can be found at **Annexe A** and written submissions for the first panel at **Annexe B** and **C**.

Clerks, January 2026

Annexe A

Constitution, Europe, External Affairs and Culture Committee
Thursday 15 January 2026

Broadcasting inquiry and informing the BBC Charter & Framework renewal

Introduction

This paper is intended to support the Committee's second session of its inquiry on the broadcasting landscape in Scotland the BBC Charter and Framework renewal, and journalism.

Last week the Committee took evidence from a panel of academics and a panel of stakeholders with an interest in news and journalism. This week the Committee will take evidence from a panel focusing on support for the screen sector.

Screen Scotland Strategy

Screen Scotland's strategy was published in March 2024 and runs to 2030-31. This set out a range of work and outcomes that Screen Scotland seeks to achieve over this period. The strategy covered:

- Support for productions
- Business support
- Skills and education
- Cinemas and audiences
- Advocacy and policy influence

The Strategy stated:

> "Economic growth remains a strategic priority, delivering many of the opportunities talented people need to realise their potential here in Scotland. Creative origination and the development of audiences for film and TV from Scotland are equally overarching aims, however, developing new work from Scotland, as opposed to simply made in Scotland, is our ideal strategic outcome. It delivers additional benefits including the strengthening of local IP generating companies, culturally relevant stories, and even greater opportunities for Scotland based creatives."

The Scottish Government increased Screen Scotland's budget in 2025/26 by £2 million. In 2025-26 Creative Scotland budgeted for grant expenditure on screen to be around £18.52m – of which around £8.35m is from Lottery income and £10.17m from grant in aid from the Scottish Government.

Economic value

Screen Scotland's strategy set out a key aim of "growth in GVA to £1bn by end 2030/31, with a parallel 55% increase in FTE employment to 17,000 FTE jobs across Scotland's screen sector". Screen Scotland has commissioned and published economic impact assessments of the screen sector in Scotland. The first was based on data relating to 2019, the second looked at 2021 and the third 2023. The latest of these was published in October 2025.

These economic impact assessments take a broad approach to the impact of the screen sector. They include:

- production and development of film and TV content;
- sales and distribution of screen content,
- exhibition sub-sector, including cinemas and film festivals,
- TV broadcast sub-sector
- screen tourism
- education, skills and talent development
- infrastructure

The economic impact assessment includes estimates of direct, indirect (supply chain), induced (multiplier effects) and spillover (impact on other sectors) impacts. SPICe produced a useful blog on economic impact assessments in 2018 which explored how economic impact assessments might go from gross estimates to net. That is how they take account of a range of factors that might affect the overall figure, such as 'deadweight', which is the output included in the estimate of the gross economic impact that would have taken place without the sector/intervention. It is not always clear in economic impact assessments, including the ones commissioned by Screen Scotland, how such factors impact on the headline estimates.

The findings of "Economic Value of the Screen Sector in Scotland in 2023" included an overall estimate of the economic impact of the sector of £718.0m gross value added and employing 12,260 FTEs. This was up from the estimates for 2021 of £627.1m GVA and 10,940 FTEs. These increases were largely, but not exclusively, driven by increases in the estimates for screen tourism, which increased from £11.7m GVA in 2021 to £140.0m GVA in 2023. The report noted that VisitScotland had changed its methodology between 2021 and 2023. The economic impact report said, "the observed increase in screen tourism in 2023 was due to a combination of methodology changes and real underlying increases in Scotland's annual number of screen tourists and their spending".

Between 2021 and 2023, there was a reduction in the estimated economic impact of 'production and development' from £442.1m GVA in 2021 to £371.0m GVA in 2023. The report explained—

> "While there were small decreases in the production of public service broadcasting (PSB) content compared to 2021, virtually all of the overall drop in spending on production was due to lower levels inward film and HETV production, on account of the Hollywood writers and actors strikes in 2023 …
> "With the resolution of Hollywood work stoppages in late 2023, Scotland's inward film and HETV production showed signs of a healthy recovery in the first half of 2024."

Screen Scotland's strategy set out how it intends to support growth in the sector. This included supporting film and TV productions that are originated from

Scotland (i.e., where the IP will remain with writers/directors/producers who work in Scotland) and attracting HETV and film production from outside of Scotland.
In relation to supporting productions originated in Scotland, the strategy set out several interventions that Screen Scotland would make, such as grant conditions, professional development, business support, and marketing.
In relation to attracting inward investment, Screen Scotland's strategy noted that "global competition for those productions remains fierce". It continued,

> "Scotland, like every other part of the UK, must continue to work hard to attract productions away from global centres such as London. Scotland must have the financial capacity to compete internationally. Production incentives across the globe are ramping up and Screen Scotland's Production Growth Fund, even coupled with the UK creative sector tax reliefs, needs to be competitive for productions of scale, in a global context where budgets and costs are rising."

The strategy also said that "key area of potential growth is in the digital screen sector", particularly in the fields of visual effects and post-production which can often take place outside of the UK. The strategy also linked this to potentially working in collaboration with the animation and games sectors.

Screen Scotland's strategy noted the importance of PSBs to the film and TV sectors in Scotland and the UK. It said that the market "is built upon the UK's PSBs, primarily the BBC and Channel 4 but also ITV/STV and Channel 5, who remain the primary source of commissions and production funding for Scotland-based producers."

The Department for Culture Media and Sport published Britain's Story: The Next Chapter - the BBC Royal Charter Review, a Green Paper and public consultation on the charter renewal process. One of the key aspects of this, and a chapter of the Green Paper, was "Driving growth across the UK". The Green Paper suggested that the DCMS is minded to include a specific public purpose in the next BBC Charter on driving economic growth across the UK and to support the creative sectors, including supporting research and development. The Green Paper said:

> "The screen industry is struggling with rising production costs and underemployment. As the UK production industry increasingly makes content for global organisations, they don't retain ownership of the intellectual property (IP), as the rights and revenue streams are held outside the UK - unlike working with a UK public service broadcaster, where independent producers retain rights under the favourable Terms of Trade."

This chapter discussed the impact of the BBC in the nations and regions in the UK and highlighted the role of the BBC to support independent producers and to support skills development. The Green Paper said that it wants the BBC to "be more ambitious when it comes to driving economic growth, particularly in the nations and regions with stronger commitments to building clusters and sustainable commissioning to boost jobs and investment."

The Green Paper noted that there had been criticism of Ofcom's criteria for determining whether productions qualify as, for example, Scottish. DCMS said that it would explore “a range of interventions to support the BBC and the production sector in the nations and regions”. This is explored later in this paper.

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.”

This concern was echoed in the submission to the Committee from Peter Strachan, who said—

> “With commissioning levels decreasing and commissioner risk aversion increasing as the impact of falling advertising and reductions in license fee income took a greater toll, freelance job opportunities began to collapse from mid-2023. Far fewer single documentaries and short factual series, where many Scottish freelancers traditionally found work, were being commissioned. Also, historically, few returnable network series have been commissioned in Scotland which elsewhere in the UK provide longer freelance contracts, making broadcast production careers more sustainable. As a result, many have been forced to abandon hard-won careers. Meanwhile, instead of concrete initiatives to sustain established and experienced talent, millions are being poured into training for new entrants and ‘createch’ jobs that do not exist at scale and possibly never will.”

Public value

The economic value of the screen sector is only one aspect of the value that the industry generates. There is also the cultural, educational, and social value of citizens or consumers watching TV and film. In a submission to the UK Parliament Culture, Media and Sport Committee’s British Film and High-End Television Inquiry in October 2023, Screen Scotland stated:

> “Alongside the economic benefit to the Scottish economy, there are creative and cultural benefits. Film and HETV deliver a wide range of creative careers, which are well paid, and allow individuals to express their creativity. Often workers in the film and HETV sectors also have careers in theatre and other live arts, and the transferability of their skills to-and-from those sectors enables wider sustainability across those creative careers.”

Screen Scotland’s strategy includes a focus on supporting cinemas and ensuring access to cinema across Scotland. Its objectives include maximising the audience for Scottish screen content and enhancing the range and diversity of screen content available to Scottish audiences. The Strategy said: [1]

> "Screen Scotland is clear that we must continue to advocate for, and support, cinemas, particularly cinemas that offer a wide contextualised programme, community and independently owned and run cinemas, touring cinema operations, multi-arts spaces and film clubs. These spaces provide not just cultural and economic benefits, but social, health and wellbeing, and educational benefits to the communities they serve."

As noted above Screen Scotland's strategy has a focus on supporting Scottish originated productions. It argues that having more productions which are made by Scottish based companies engaging Scottish-based producers, writers, directors and crew will support an "authentic representation of Scotland and its cultures".

Screen Scotland's strategy makes a short reference to Gaelic and Scots, saying that its funding is available to "film and programme makers working in Scotland in a range of languages, including Gaelic, Scots and English." The strategy does not directly reference BSL. Recent research commissioned by LumoTV found that Deaf signers preferred sign-presented content across different age groups and most programme types.[1]

The Green Paper said that DCMS is considering "options for providing MG ALBA with more certainty over its funding as part of the Charter Review". The Green Paper also suggested that DCMS is exploring "re-evaluating the BBC's obligations to provide certain genres that are at-risk or underserved [including] production of sign language content".

The Committee received a submission from academics from the Centre for Cultural Policy Research at the University of Glasow. In relation to PSBs (both in terms of their role in supporting TV production and journalism), this submission highlighted two key issues—

> "First, that a robust system of PSM provision has now become essential to the safe and proper functioning of everyday life. Indeed, our research indicates that audiences in Scotland, and across the UK, continue to derive significant personal and societal value from a pluralistic PSM framework. Secondly, related to this, PSM deserves recognition as a key national *infrastructural* asset. New functions have effectively re-positioned PSM as elements of what might be seen as 'critical media infrastructure'."

The Green Paper said of the BBC:

> "Every day, the BBC tells the story of who we are – our people, our places and our communities that make up life across the UK. It allows communities across all nations and regions of the UK to hear their distinctive voices and see their stories represented through its local services that span the entirety

[1] [1] Kusters et al (2025), *Sign-presented versus sign-interpreted content on British TV: What do deaf signers want?*

> of the UK and its broadcasting in Welsh, Gaelic and Irish and Ulster-Scots. In Scotland, the BBC's coverage in English and Gaelic of festivals, including TRNSMT, Belladrum and The Mòd, brings people together for shared cultural moments."

The Green Paper says that DCMS does not see the BBC as merely a market-failure intervention confined to content the commercial sector would never provide. Nevertheless, it emphasises that the BBC's public funding should enable it to commission and sustain genres that are culturally and socially valuable even when they are less commercially attractive.

Public service broadcasters' support

Out of London quotas

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.

Peter Strachan's submission to the Committee suggested that the off-screen talent criterion should not only be "by cost" but rather take better account of where crew lives and works. He also suggested that Ofcom should "require detailed production reporting and end self-monitoring and self-policing that obscure regional underinvestment". Last week Professor Higgins also suggested that the criteria were not being followed "sufficiently rigorously" and said that there is scope for greater transparency.

The Green Paper said that DCMS is considering "further quotas or obligations around production in the nations and regions, or making adjustments to the 'Out of London' quotas" as well as increasing the number of commissioners based outside of London.

Terms of trade

Section 285 of the Communications Act 2003 requires PSBs to have Codes of Practice for commissioning independent producers and these are required to be approved by Ofcom. Section 285 also requires Ofcom to have in place Guidance to assist PSBs in drawing up Codes. This guidance was recently updated in 2025.

The guidance sets out key issues to be addressed by each PSB's code. For example, PSBs Codes must include "satisfactory arrangements about the duration and exclusivity of rights". Each PSB has terms of trade which it agrees with PACT. These include details of how the broadcaster will contract with independent producers, such as how long primary rights are held by the PSB – e.g. how long the producer will hold exclusive rights on linear TV or on demand, as well as how secondary rights may be exploited (e.g. selling on to a SVOD provider after a certain period).

These favourable terms of trade are seen as a crucial element of the growth of independent production in the UK. A 2023 paper by Professor Gillian Doyle said that "levels of new market entry in this sector remain high and the UK production sector continues to renew itself constantly". Professor Doyle identified two key factors to this: the role of PSBs and the terms of trade. However, she warned that both of these measures are "under threat because SVoDs such as Netflix have become more important as buyers of new content and generally they expect to buy out all global rights" and that PSBs' approaches to commissioning is also "precarious".

Collaboration

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, and the news release at the time stated—

> "The renewed Memorandum of Understanding (MOU), will see the BBC and Screen Scotland jointly invest £3million to support the production of new TV drama, entertainment, scripted comedy, documentary and factual formats on the BBC's network television services from Scotland and to develop the skills and talent required to devise, develop and produce those new shows."

Last week Professor Higgins suggested that the BBC could have more relationships with other stakeholders in Scotland and, for example, support the higher education sector in Scotland and to provide opportunities for graduates and support festivals. He suggested that the BBC should be more ambitious in its work in Scotland.

There was discussion between Channel 4 and Screen Scotland to develop an MoU in 2020. This does not appear to have come to fruition, although over the years, there has been some partnership working. There does not appear to be any formal partnerships between Screen Scotland and ITV, STV, or Channel 5.

Public sector support

Film and high-end television are global businesses. A 2024 report by Olsberg PSI found that "governments around the world have introduced or expanded production incentives in order to attract valuable investment and foster the development of their film and television sectors."

The UK Government provides tax-credits to the creative industries including for High-end TV and films. There are also a number of UK-wide grant schemes administered by the BFI.

The budget for Screen Scotland in the current financial year is around £18.5m. Around £10.15m of this is supported by funding from the Scottish Government and around £8.35m is lottery funding. This year, the Scottish Government increased Screen Scotland's budget by £2m. This is intended to support the objective of achieving £1 billion gross value added to the Scottish economy by 2030. Screen Scotland has a range of funds available for film-makers, distribution & screening, professional development, and education.

In its submission to the UK Parliament Culture, Media and Sport Committee's British Film and High-End Television Inquiry in October 2023, Screen Scotland noted that "inward investment films and HETV series are attracted into Scottish locations and studios". Screen Scotland provides a Scotland-wide film/screen commission and also supports the development of studio facilities. Local authorities can also provide support for filmmakers (see Glasgow for example).

Skills pipeline and careers

Screen Scotland's strategy highlights the importance of supporting skills and education. There are several strands to the strategy in this regard.
On 10 September 2025, Screen Scotland announced that, along with Education Scotland and Scottish Government, it had launched the "national rollout of Film and Screen into Scotland's Curriculum for Excellence". This is placed within the "practical arts". Up to S4, the content of the curriculum is largely a matter for each school or teacher – from S4 onwards, the curriculum is currently largely led by the specifications of the qualifications offered by the school (or college). This announcement does not necessarily mean that all pupils will have the chance to learn about film and screen, rather that there will be support and guidance for schools and teachers to be able to provide that education. There is currently a much broader piece of work on developing and updating the curriculum in Scotland – the Curriculum Improvement Cycle – and it is not at this stage clear how this announcement fits in and will be reflected in the work of the CIC. The Government has said that new draft "technical frameworks" of the curriculum are expected to be published in 2026.

Screen Scotland's strategy also set out ambitions in non-formal education and colleges and universities.

Screen Scotland is the "BFI Skills Cluster" for Scotland. This has come with £1.1m of lottery funding per year between 2023 and 2026. These clusters are expected to work with local industry and other partners to coordinate skills and training in their area. BFI states, "Skills Clusters will help identify skills gaps, develop clearer pathways to employment and support the career development and progression of those within local communities with a view to building a more representative screen production sector."

Screen Scotland's Strategy discussed the skills and career development separately to "education". This noted the importance of on-the-job training and said that Screen Scotland would seek to "ensure training provisions are an essential element on every production as we mainstream sustainable practices across all production." The Strategy noted that traditional apprenticeship schemes are difficult in an industry with a high number of freelancers undertaking project-work; it highlighted a number of bespoke schemes which run in Scotland. One of the issues raised around the BBC's axing of River City was the loss of consistent and continuous work and opportunities the show offered. Last week Professor Nicholas Higgins also noted that Outlander is coming to an end, and this was another high-profile and returning production that created opportunities for career and skills development.
Professor Higgins also led research on behalf of Screen Scotland in 2023 which mapped the existing practice-based filmmaking education. The report does not appear to have been published by Screen Scotland. This recommended a federated Scottish film and television delivered by several higher education institutions and covering both above the line (screenwriters/directors/producers) and below the line roles at post graduate level. Professor Higgins' report also argued that, with some exceptions, the independent sector's training for "below the line" workers "currently offers no clear route through the myriad of short course offerings that might clearly result in skills progression and a below the line

specialist filmmaking career". BECTU's submission argued that "too often production companies are allowed to claim a commitment to training because they have taken on a few trainees for a few weeks in random skills". BECTU also noted that it runs training through its BectuVision programme for film and TV Freelancers in Scotland.

Professor Higgins' research warned that there could be a "above the line" bottleneck without a feature film production scheme to allow graduates of film education to develop professionally. Peter Strachan's submission also suggested that PSB commissioning out of London productions in Scotland does not necessarily benefit above the line talent in Scotland. He said—

> "The issue is not only the volume of Scottish hires, but the location of senior creative and business roles. In dramas such as Vigil, below-the-line craft roles, (Ads, wardrobe, make-up, SFX, camera assistants etc), may be filled locally, but key above-the-line production leadership positions are often not. This prevents Scottish producing, writing and directing talent from flourishing. Sample data indicates that directors based in Scotland account for under 38% across all MoL Scottish scripted and unscripted productions in 2003."

The Committee received a submission from Dr Lisa Kelly from the University of Glasgow. She highlighted "systematic skills gaps" in safety skills and highlighted research that showed, among other things, that three quarters of UK crew "report that their own safety, or that of a colleague, has been compromised at work". Dr Kelly recommends that safety play a greater role in education, training and that public funding should be tied to productions with a demonstrable culture of safety.

All high-end TV productions which intend to take advantage of UK tax relief scheme contribute to the High-end TV Skills Fund. This fund is administered by ScreenSkills who recently reported that, "since 2013, the High-end TV Skills Fund has collected and invested just over £35 million in skills and training for the high-end TV industry." In its submission to a Westminster Committee in 2023, Screen Scotland expressed dissatisfaction with ScreenSkills describing it as having a "a track record of not acting collegiately" and Screen Scotland said—

> "ScreenSkills has not recognised the devolved context for developing skills and that there are dedicated bodies across the UK that already focus on this task, and enjoy trusted relationships with local crew, facilities, and producers. Its structure does not recognise the level of integration of film and HETV production outside of London and the Southeast of England."

The Green Paper noted that the BBC is required currently to play a role in developing skills across the UK's creative workforce. Under the current Framework Agreement, the BBC must "make an effective contribution to the preparation and maintenance of a highly-skilled media workforce". The Green Paper said that DCMS is considering options to enhance the BBC's role in this regard although it noted that expanding the BBC's role may have cost implications. The Green Paper set out three potential options to be explored:

- "adjusting the ambition of BBC targets on training and apprenticeships, or creating greater specificity in targets such as on training in the nations and regions
- encouraging the BBC to consider skills pipelines and wider workforce needs across the creative industries, and to work in partnership with its third-party suppliers, education providers, industry bodies and other public service media providers to help address skills gaps across the sector •
- ensuring the BBCs uses its extensive platform to support emerging talent and showcase the creative industries as viable career options, including for underrepresented groups."

Ned Sharratt, Researcher (Education and Culture), SPICe
Date: 09/01/2026

Bectu submission to the Scottish Parliament Culture Committee, review of Scottish Broadcasting 2026

9 January 2026

Within Scotland, the BBC continues to play a fundamental and integral role in the health of the industry. Programmes produced directly by the BBC or commissioned by it, or through support it offers to partners and production companies, are essential in underpinning the wider industry. This is especially true in terms of sustaining the skills base necessary to ensure that productions see Scotland as an attractive option when considering where to base their productions.

STV also plays a key role in supporting the production community in Scotland through STV studios, however as a Production company it is entirely dependent on largely London based, or international, commissioners for all its work.

Overall, across the UK many would argue that there is a more positive landscape as we move into 2026 but there are clear challenges facing the industry going forward. Successive Licence fee settlements have severely and negatively affected the BBC's programme making and commissioning capacity across the UK. Light touch regulation and commissioning practices do not offer sufficient protection to ensure Scottish based crews are employed as much as they should be. Attempts to politicise the BBC are also an ongoing concern for Bectu.

The increase in streaming, video on demand and social media channels continues to present real issues for traditional linear broadcasting too, particularly within News. YouTube is now considered to be the second-most-watched service in Scotland amongst the under 35s. While the centralisation and consolidation of news output at both the BBC and STV are largely attributed to these changes in viewing habits by the broadcasters, they will nonetheless significantly reduce plurality and local relevance across Scotland. This brings with it a resultant loss in regional identity and local employment opportunities.

Across the wider industry, areas such as High End TV Production and Film Production are fairly stable.
Latest figures suggest that the number of productions dropped slightly in 2025 although overall spend in Scotland increased. However Scotland's once vibrant unscripted sector continues to see a significant lack of commissions which has a devastating effect on employment amongst the Freelance workforce.
It is hoped that the BBC's recent changes to its commissioning model along with the promised increase in "Out of London" spend will translate into a significant increase in unscripted commissions across Scotland.

When considering the health of the industry it is essential to ensure that skills development has a high priority and that Fair work policies are robustly implemented and maintained at all levels. Too often production companies are allowed to claim a commitment to training because they have taken on a few trainees for a few weeks in random skills. More often than not these companies, particularly brass name plate entities, have no real knowledge of where the industry wide skills gaps are across Scotland.

Over the past 15 years BectuVision, working in partnership with Screen Scotland and the BBC, has transformed the landscape around training and skills development and its strategic cross Scotland approach has been fundamental to addressing real skills gaps through its long term skills planning and career development programmes.

With regard to Fair work, the industry is predicated on complex commissioning supply chains which can involve public sector or corporate customers or Sports governing bodies.

Broadcasters then commission production companies who in turn utilise facility companies and/or a range of suppliers. The whole commissioning process is ultimately supported by a Freelance workforce. Unrealistic commissioning tariffs and intense budgetary pressures result in excessively long hours and poor employment practices being the norm for too many.
These pressures and the freelance ad hoc nature of the employment creates an inherent insecurity which amongst other things proactively discourages workers from having an effective voice in the workplace and is detrimental to their health and wellbeing.

Looking ahead, there are several ways in which the Scottish Government can play an important role in ensuring that there is a brighter and healthier future for the Industry in Scotland.

It should press the UK government to support a realistic licence fee as the best model for PSB provision; Stable funding is critical to the BBC's ability to deliver public value. Retaining the licence fee, adjusted for inflation, ensures the organisation can plan long term, support diverse services, and maintain independence from political or commercial pressures. Any reliance on advertising or subscriptions risks undermining universal access and the production of distinctive UK content.

It should press the UK government to ensure that the BBC is free from political interference and that board appointments are non-political; Independence from government is central to the BBC's credibility. It allows the organisation to report impartially, hold those in power to account, and make editorial decisions free from political interference. Safeguards must be maintained to protect impartiality across commissioning, in-house production, and editorial content. The BBC should continue to operate at arm's length from government while remaining accountable to regulators such as Ofcom and to Parliament in a structured and transparent way.

It should closely monitor the BBC commissioning model changes and challenge Channel 4 to increase Scotland's commissioning decision making control. The BBC's UK-wide presence is central to its public service remit but must be conducted meaningfully.

It should lobby for Ofcom to be required to stringently apply all three of its key "regional production" criteria and to be given greater powers to protect regional culture, identity and employment across the distinct regions of Scotland. Regional production quotas must be meaningful, providing long-term opportunities, senior decision-making roles, and real place-based growth rather than simply serving as a compliance exercise.

The Scottish Government must also mandate agencies such as Creative Scotland/ Screen Scotland, Event Scotland, Sport Scotland and Local Authorities to play a full and robust role in addressing the serious deficiencies in Fair work created by the "long hours, no complaints" culture prevalent within the industry for too long now.

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Annexe C

Screen Scotland

Written Submission to the Constitution, Europe, External Affairs and Culture Committee of the Scottish Parliament's Enquiry in Scottish Broadcasting

12/01/26

Purpose

Screen Scotland welcomes the Committee's inquiry into Scottish broadcasting. We offer this submission as a constructive contribution from a 'critical ally" perspective: recognising the BBC's foundational importance to Scotland's screen economy and culture, while identifying areas where policy and practice could better support long-term sustainability, creative origination and economic impact in Scotland.

Context

Who we are

Screen Scotland drives development of Scotland's film and TV industry, through funding, strategic support and advocacy. We were established in 2018 as part of Creative Scotland, funded by the Scottish Government and The National Lottery.

Screen Scotland's vision is to cultivate creatively ambitious and economically sustainable film and TV sectors in Scotland, which provide fulfilling jobs and opportunities for people across the country, at all stages of their careers. We work to develop Scotland's creative potential as a filmmaking nation and as an originator of distinctive films, television programmes and content enjoyed by audiences the world over.

Screen Scotland's focus is on the creative and economic elements of film and television production in scripted and unscripted genres. We do not have a remit for audio production for radio or podcasts, news on any platform, or online audio-visual content production.

The Current Health of Scottish Broadcasting and Production

Broadcasting and production are two sides of the same coin. Broadcasters need a secure supply of programmes of the range and quality their audience expects. Production companies need an accessible market for their products - the programmes they devise, develop and produce. In turn those production companies need skilled and talented creative workers in their offices, and in front of the camera, as well studios and/or location filming facilities and post-production suppliers. It is an ecosystem and one that has existed in Scotland to some extent for much of the last seventy years.

Scotland's TV broadcast/production economy is most sustainable when it contains a healthy balance of production that is creatively originated within Scotland alongside international/inward investment production.

With Netflix, Amazon Prime, Apple, Sony and many other non-PSB now regularly active in Scotland, the publicly owned PSBs – the BBC and Channel 4 – are not the only source of production, but they remain the bedrock of our sector. Therefore, the Scottish sector's health is directly dependent on both PSBs being adequately funded and focused – through their charters/licence, Ofcom's quotas - on commissioning new programmes and series from Scotland.

Current Economic Data on the Health of Scotland's Broadcast/Production Sector

Every two years Screen Scotland publishes economic impact[i] data compiled by Saffery LLP and Nordicity Limited for the screen sector within Scotland's economy (the most recent which was published in October 2025).

The "Screen Sector" has been defined in our research as inclusive of all film and TV production and development (including inward investment production); animation, visual effects (VFX) and post-production; film and TV sales and distribution; TV broadcast; film exhibition, and film and TV festivals; screen tourism; film and TV education, skills and talent development; and film and TV production facilities.

These reports evidence a consistent increase in the economic impact of the screen sector within Scotland across the period 2019 to end 2023:

2019	**2021**	**2023**
Screen Sector-Wide Employment: 10,280 FTEs	10,940 FTEs	12,260 FTEs
Production & Development Employment: 5,120 FTEs	7,150 FTEs	5,420 FTEs
TV Broadcast Employment: 710 FTEs	710 FTEs	600 FTEs
2019	**2021**	**2023**
Screen Sector-Wide Economic Impact: £567.6m GVA	£627.1m GVA	£718.0m GVA
Production & Development Economic Impact: £315.1m GVA	£442.1m GVA	£371.0m GVA
TV Broadcast Economic Impact[ii]: £51.8m GVA	£53.4m GVA	£46.6m GVA

Source: Saffery/Nordicity

While inward investment production on projects such as Sony's *Outlander*, Amazon Prime's *Good Omens 2* and *The Rig* has delivered sector growth since 2019, the PSBs – primarily the BBC and C4 – remain the core source of demand, financing and commissioning of TV programmes and documentary films made by Scotland-based producers (those creative production businesses, formed and managed in Scotland that originate, develop and then produce new shows and own the intellectual property in those original productions).

In 2023, PSBs continued to provide the overwhelming majority of commissioning opportunities for Scotland-based production companies. That said, PSB spend on production in Scotland fell slightly between 2021 and 2023 before accounting for price inflation.

The further impact of cost inflation on the value PSB spending in Scotland, combined with commissioning uncertainty across 2023 for the BBC and C4, reduced production subsector growth, particularly within Scotland's long-established unscripted television production sector.

PSB estimated TV content spending in Scotland (£ millions)

	2019	**2021**	**2023**
BBC UK Network	84.8	92.8	88.8
BBC Scotland	60.1	67.1	66.2
Channel 4	20.7	23.5	27.3
BBC/MG Alba	16.9	16.9	18.8
STV	9.2	9.4	9.6
ITV	2.7	8.1	7.1
Channel 5	2.2	5.5	4.7
Total	**196.6**	**223.3**	**222.4**

Source: Saffery/Nordicity estimates based on data from public financial reports, Ofcom and interviews with broadcasters. Note: Figures may not sum to totals due to rounding.

Ofcom quotas and 'Scottish qualifying' production

Screen Scotland draws the Committee's attention to the Oliver & Ohlbaum Associates (O&O) report [20 years after the Communications Act 2003](), which examined how Ofcom's current Nations and Regions guidance operates in practice. Annex 1 looks at this O&O Report in more detail. In summary, the report found that a significant proportion of BBC network commissions qualifying as 'Scottish' were awarded to companies headquartered outside Scotland, often relying on the presence of a 'substantive base' rather than sustained economic or creative activity in Scotland. As a result, much of the long-term value of these programmes – particularly intellectual property ownership – accrues outside Scotland.

Since the O&O report was published there are indications through the BBC's drama commissioning that a more positive approach to commissioning from Scotland based companies is forming. A number of returning and new scripted commissions were announced in 2025, of which Screen Scotland is supporting a number through its Broadcast Content Fund (set out later in this paper).

Channel 4 was found to rely more heavily on companies formed and headquartered in Scotland, illustrating that different commissioning models are possible within the existing regulatory framework.

Screen Scotland believes that the current Ofcom guidance, last revised in 2019, does not adequately reflect where economic value is created, nor does it support the long-term development of indigenous, Scotland-formed and operated, production businesses.

Working with the BBC

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.

Broadcast Content Fund investments in BBC-commissioned productions

Through Screen Scotland's Broadcast Content Fund, we have co-invested in a range of BBC-commissioned programmes from Scotland-based independent production companies. Recent and some current examples include:

- *An t-Eilean (The Island)*, series 1 – £500,000 investment via Glasgow-based Black Camel, supporting the growth of a Scotland-headquartered company with returning series potential and long-term IP value. Discussions on a second series are ongoing.
- *Counsels*, series 1 – £500,000 investment in a new returning drama from Balloon Entertainment, strengthening Scotland-based creative origination and company scale.
- *Mint* – £500,000 investment in a new drama from Glasgow-based Crabapple, due to premiere in 2026, supporting IP ownership and the development of a company with international growth ambition.
- *Only Child*, series 1 – £335,000 investment in this Moray-set comedy from Forres-based Happy Tramp North, demonstrating the role of PSB commissions in sustaining production companies outside the central belt.
- *Rebus*, series 1 – £400,000 investment prior to the BBC's acquisition of the series, illustrating how early public investment can leverage later BBC engagement and maximise economic return to Scotland.
- *Gifted*, series 1 – £500,000 investment via Black Camel in this Edinburgh-set children's drama for CBBC, broadcast in 2025, supporting talent progression and repeat commissioning relationships.
- *The Ridge*, series 1 – £375,000 investment in this Scotland–New Zealand co-production.
- *Hebridean Baker: Nordic Islands*, series 1 – £98,000 investment in this four-part factual series from Glasgow-based Caledonian.

These investments are designed to generate lasting benefit by building company capacity, supporting the retention of intellectual property in Scotland and creating sustained employment for Scotland-based writers, directors, cast, crew and facilities. They align directly with the BBC's Public Purpose to invest in the creative economies of the nations and, looking ahead, with proposals for a strengthened Charter focus on economic growth.

Skills and talent development

Screen Scotland and the BBC continue to collaborate on targeted skills and talent initiatives, including:

- **Supersizing entertainment formats** – launched in 2025 with TRC Media, this programme supports the development of ambitious entertainment formats from Scotland-based independent producers. Participation was limited to companies headquartered in Scotland.
- **River City training academy** – delivered jointly with BBC Studios, this initiative provided structured, work-based training across a range of production disciplines. Following the cancellation of *River City*, Screen Scotland is working with the BBC to continue this model across newly commissioned Scottish-qualifying dramas, with a focus on progression for both below-the-line and above-the-line talent.
- **Traitors training opportunities** – jointly funded by Screen Scotland and the BBC and delivered by Studio Lambert, providing openly recruited training roles on each UK series, with a particular focus on Scotland-based crew, including those in the Highlands and Islands.

Alongside the work we undertake with the BBC in skills and talent development we also work with a range of other partners to upskills Scotland's screen sector, investing £2m+ p.a. in this work, leveraging a similar sum from industry partners. Some examples include:

- VFX and Animation – Following industry consultation, we worked with TRC Media to develop and deliver RESET, a dedicated VFX and animation training programme for Scotland. Launched in 2021 with support from the National Training Transition Fund as part of Covid-19 recovery, the programme continues into 2026 with funding from the BFI, Screen Scotland, and local industry.

- Screen Scotland supports inward investment productions to ensure lasting benefits from transient projects by embedding training at all levels. Productions such as *Good Omens 2* (Amazon Prime Video), *The Buccaneers* series 1–3 (Apple TV), *Ghostwriter* (Warner Bros), and both *Outlander* and *Outlander: Blood of My Blood* (Sony Starz) have worked with us to create meaningful work-based skills/career development opportunities for Scotland-based crew.

The success of these programmes depends on sustained funding and proactive industry engagement from Screen Scotland. These training examples highlight our engagement across the mixed economy of Scotland's screen sector. While Screen Scotland has deliberately pursued this approach to differentiate Scotland within the UK, it is resource-intensive and requires expertise, continuous engagement and funding to support sector growth.

Education

The BBC is working with Screen Scotland to develop short-form educational content to support Scotland's Film and Screen expressive arts curriculum.

These collaborations demonstrate the positive impact that sustained partnership between the BBC and Screen Scotland can have in developing talent, strengthening companies and supporting a resilient screen workforce in Scotland.

Screen Scotland's position on Charter Renewal, Ofcom Quota Criteria and the Future Vitality of Scottish Broadcasting

Charter Renewal is an opportunity to reach for better outcomes than those achieved under previous charters. The Culture Committee's engagement with broadcasting policy across parliaments at Holyrood has delivered positive outcomes for Scotland's production sector and we hope that will continue in the next parliament, across the Charter Renewal period and beyond.

Funding model

- Screen Scotland expresses no view on how the BBC is funded beyond recognising the value of the principle of universality.

- The level of funding allocated to programmes by the BBC is directly connected to the BBC's income and in real terms this has fallen significantly over the last two charter periods. This inhibits delivery of the BBC's public service purposes, and it undermines the UK's competitiveness in the global creative economy.

  We will always argue for a well-funded BBC that spends its public and commercial income fairly across the UK to deliver its public services purposes in all four home nations and supports the creative economies of all parts of the UK.

- How the BBC's commercial income is applied towards delivery of its public service obligations in Scotland is not clear and we would welcome further clarity on this in the BBC's annual accounts.

Supporting Scotland's creative economy

- The BBC and C4 are the only national PSBs who regularly commission programmes from independent producers from Scotland. We rely on both to sustain a healthy broadcast and production sector in Scotland. We argue that both have an obligation as a consequence of their public ownership to be "for all the UK", and to deliver their public service remits evenly and equitably across all four home nations, at least proportionate to each nation's share of UK population.

- We would welcome Scottish production commitments/quotas/licence obligations at a reasonable level on the channel 3 licence holders. The channel 3 (ITV/STV) audience is distinct from the BBC and Channel 4 audiences and the limited presence of Scottish voices, concerns and perspectives across network ITV output undermines UK cohesion.

- The majority of the programmes the PSBs commission under their Scottish production quotas should be commissioned from production businesses formed and operated in Scotland. Any production 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. We recognise that a mixed approach that allows for both types of sourcing for “Scottish qualifying” programmes has value.

- Under the current Charter the BBC is obliged to deliver a number of public purposes. Public Purpose 4 states, “… *in commissioning and delivering output the BBC should invest in the creative economies of each of the nations and contribute to their development*.”

  The *BBC Royal Charter Review Green Paper* notes that the UK Government is considering creating a new BBC Public Purpose focused on driving economic growth, that would emphasise the importance of the BBC using its scale, reach and influence to address the challenges facing the creative economy across the UK. This would reflect the importance that the UK Government places on the BBC’s role driving growth across the UK’s wider creative economy, boosting local economies and providing jobs. This is welcome, and Screen Scotland will argue that this is best achieved within Scotland’s broadcast/production sector by fostering a mixed economy that combines inward investment production alongside creative origination from within Scotland’s long-established independent production sector.

  The balance of that mixed economy approach from the BBC should favour of creative origination from within Scotland for the BBC’s Scottish qualifying output.

- Creative origination from within Scotland is best achieved by BBC commissioners for the BBC network who live and work in Scotland. The Green Paper recognises the potential benefits of the BBC moving more decision-making powers outside London, how this could underpin the DCMS vision of world-class creative clusters in the nations and regions. Screen Scotland agrees that locating BBC network commissioning power outside of London would drive befits across the UK.

  Screen Scotland will argue for the relocation of complete genres commissioning teams from London to Scotland under the new Charter.

- Within the Green Paper, DCMS undertakes to explore new or extended interventions to support the BBC and the production sector outside of London, including further quotas or similar obligations, and/or adjustments to the current “Out of London” quota regime.

  Screen Scotland will continue to argue for Scottish production quotas based at least on our share of UK population, and for the majority of the programmes the BBC commissions under any Scottish production quota to be commissioned from production businesses formed and operated in Scotland.

Governance

- 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.

- Parliamentary oversight of the BBC from within Westminster has been effective at times but the current membership of the Culture, Media and Sport Committee highlights a weakness that could be addressed in the next Charter.

  The current CMS Committee has 11 members, all of whom represent English constituencies, most of which are located in the south-east of England. A defined parliamentary oversight role for the parliaments in Holyrood, Cardiff and Stormont would help ensure the BBC delivered its public service role across the whole of the UK.

David Smith, Director, Screen Scotland

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[i] https://www.screen.scot/binaries/content/assets/screen-scot/funding--support/research/final_economic_value_of_screen_sector_in_scotland_report_23.6.22.pdf ;

https://www.screen.scot/binaries/content/assets/screen-scot/funding--support/research/economic-value-of-the-screen-sector-in-scotland-in-2021/full-report-economic_value_of_screen_sector_in_scotland_2021_2023-08-21-1.pdf;

https://www.screen.scot/binaries/content/assets/screen-scot/funding--support/research/economic-value-of-the-screen-sector-in-scotland-in-2023/economic-value-of-the-screen-sector-in-scotland-report-2023---oct-2025-v2.pdf.

[ii] "TV Broadcast" data reflects an estimate of the economic impact generated by the public service broadcasters' (PSBs') operating expenditures in Scotland excluding expenditure on content creation, both in-house and through external commissioning.

Annex 1: 20 years after the Communications Act 2003: the impact on production from and in Scotland

While our economic impact research continues to report the impact of UK PSB's spending within Scotland's economy on a consistent basis with previous reports, we would draw the Culture Committee's attention to the findings of a separate report commissioned by Screen Scotland and authored by Oliver & Ohlbaum Associates (O&O) entitled *20 years after the Communications Act 2003: the impact on production from and in Scotland* (submitted as an attachment).

This O&O Report highlights how the economic impact of certain 'Scottish qualifying' UK PSB commissioned programmes within Scotland's economy is unclear as a consequence of the latitude afforded in qualification as 'Scotland productions' by the current Ofcom Guidance on regional production.

O&O analysed trends in commissioning from production companies originating in Scotland and from those founded or headquartered outside of Scotland but with an office here. They analysed commissions by the UK PSB network main channels that have been allocated to Scotland in Ofcom's Made out of London register and count towards the PSBs' Scottish-qualifying production quotas.

O&O found that:

- only five of the Top 15 "Scottish" producers (by hours commissioned) were headquartered in Scotland over the period.
- the remaining ten were head-quartered in London, and their output qualified as Scottish under Ofcom's current Guidance on regional production and regional programme definitions. In many cases they relied on the Ofcom criterion of having a 'substantive base' (office) in Scotland.
- the BBC and Channel 4 have adopted very different approaches to meeting their production obligations.
- only two of the 11 suppliers mainly used by the BBC in the Top 15 "Scottish" producers, were companies formed and headquartered in Scotland, compared with three out of four that mainly supplied Channel 4.
- 80% of the total episodes made by the Top 15 for the BBC were commissioned from producers headquartered in London, compared to only 43% of the total episodes commissioned by Channel 4.

On publication of the O&O report Screen Scotland expressed concern that the BBC's commissioning process across the last decade has subverted the purpose of those production quotas, limiting the economic impact of the BBC's "Scottish qualifying" commissioning in the Scottish economy, and reducing creative opportunities for Scottish TV sector production companies and workers in comparison to projects that originate in Scotland. The Department of Culture Media and Sport noted the findings of the O&O Report in the recently published *BBC Royal Charter Review Green Paper*.

Screen Scotland has also called for current Ofcom quota regime for Nations & Regions production to be reviewed. As the Committee will be aware those quota criteria were last amended in 2019 and remain focused on three tests that in combination determine how Ofcom allocates a programme to what the regulator describes as the UK's macro-regions, of which Scotland is one.

For now, Ofcom continues to allow for the full allocation of any programme's "volume" (running time) and "value" (production cost) against a single macro-region if that macro-region is the host of a "substantive base" for the relevant production company, irrespective of where the production activity – the core economic impact of any programme – takes place. The current Ofcom guidance is focused on production in a macro-region and does not recognise or measure the longer-term value derived by any production company from the intellectual property it owns in the programmes it produces. This long-term value is the bedrock of any health, sustainable production sector and if it is owned and managed in Scotland it supports the health of Scotland's production/broadcast sector.

In response to the O&O Report, and ahead of any review by Ofcom of its quota criteria, the BBC decided to alter how it applies the Ofcom quota criteria going forward. In a blog post from Rhodri Talfan Davies, Director of Nations at the BBC (https://www.bbc.co.uk/mediacentre/articles/2025/strengthening-impact-bbc-network-television-investment-across-the-uk), the BBC confirmed that it considered the Ofcom regime to be complex and recognised that, "… *a show does not need to qualify on all three counts in any one nation or region to be deemed to originate from that area. In fact, in a small number of cases, a show could be categorised as being Scottish, Welsh or Northern Irish under the Ofcom criteria solely on account of the location of its production office (even though most of its budget may be spent in other UK regions).*"

To address this the BBC said, "*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.*

In Wales, Scotland and Northern Ireland, our goal is to ensure we always meet our commitment to spend at least 17% of our network TV budgets across the three nations without any reliance on productions that may have local offices, thereby meeting Ofcom's criteria, but do not spend a significant amount of their production or talent budgets in that nation. Again, we'll be transparent about the progress we're making each year.".

This is a potentially positive change, dependent on how rigorous the BBC is in applying this new commitment, but it is not address the concern highlighted in the O&O Report - that across the last decade the BBC has more often looked to London-based production companies for new series that can qualify as Scottish than it has Scotland headquartered producers, Scotland-based creative people.

Refocusing the BBC's buying model, the system the BBC uses to allocate programme budgets and make commissioning decisions, to prioritise commissioning "Scottish qualifying" programmes from production companies formed and managed at the most senior level in Scotland would greatly improve the long-term sustainability of our Scottish screen sector.

It would help ensure those programmes employ Scotland-based writers, directors, editors, crew, facilities and front-of-camera talent, and it would drive IP-derived income from the sales of those programmes in international and secondary markets back into the Scottish economy.