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Director, Scotland

Clare Adamson
Convener, Constitution, Europe, External
Affairs and Culture Committee
The Scottish Parliament
BY EMAIL

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Dear Clare,

Follow-up from appearance on 15 January 2026

Thank you again for the invitation to the Committee on 15 January 2026 where we discussed our consultation on proposed changes to STV's licences regarding regional news. Given time constraints we were unable to discuss the Committee's ongoing inquiry into Scottish broadcasting in any detail and I hope the following serves as a useful contribution to that work.

The broadcasting sector in Scotland

Audiences in Scotland benefit from a wide choice of content, both from our public service broadcasters and international streamers, and watched on average over five hours of video content at home per day in 2024. Our PSBs provide a range of local content specifically for people in Scotland – predominantly news and current affairs – while also producing content that spans multiple genres for audiences across the UK. This includes the valuable contribution made by MG ALBA in its partnership with the BBC, with last year's *An t-Eilean* becoming the first Gaelic drama to be broadcast UK-wide.

I wanted to also highlight the continuing reach of radio in Scotland, with 87% of adults listening each week in the first quarter of 2025. Local commercial radio does particularly well in Scotland, reaching over half of adults, and we have seen this year already the launch of STV Radio and major investment from Bauer that will see Clyde 1 move into a new home in the centre of Glasgow which is good news for the industry and audiences.

There is a long-term story of growth in Scotland's production sector but there have been challenges in recent years. Spend on external commissions reached £225m in 2022, up from £119m in 2010 and there was an increase in the number of active production companies based in Scotland up from 32 in 2014 to 51 in 2022.¹ Targeted regulation has supported this growth but it has primarily been delivered through the skills and talent across Scotland's screen sector, alongside strategic moves from broadcasters to invest more of their money outside of London.

The mixed ecology of production that takes place in Scotland, both in terms of the genres produced here and the supplier base used to make programmes, is a great strength of the sector. In recent years we've seen high-quality drama, children's programming and high-end factual productions being produced here alongside trusted and accurate news that keep people informed about life across the country. There is also a valuable mix of homegrown companies such as Firecrest Films, Synchronicity and IWC who make programmes for PSBs and beyond, working alongside companies delivering inward investment, such as Sunset+Vine and Mentorn which provide employment opportunities for production talent to work in the industry as well as a related positive economic impact.

¹ [20 years after the Communications Act 2003: the impact on production from and in Scotland](#) – A Screen Scotland Report prepared by Oliver & Ohlbaum

More recently there have undoubtedly been challenges for production companies across the UK and Scotland is not immune to that. As we set out in our latest review of Public Service Media, *Transmission Critical*², fundamental financial pressures are likely to persist for our broadcasters when it comes to commissioning due to declining revenues and the increasing cost of production. In addition, broadcasters such as the BBC are increasingly focussing on fewer commissions with a higher impact to meet these challenges.³ Indeed a joint report by Screen Skills and 4Skills⁴ highlighted that work may be necessary to build resilience in the screen sector given the particular expertise that exists in Scotland in unscripted and children's programming – both of which have faced declines in commissions in recent years.

We continuously engage with the sector on the delivery of quotas relating to production in Scotland and know that some stakeholders would like to see changes to our regional production Guidance to create a more prescriptive regime. The criteria currently in place are designed to support a mixed ecology and the benefits this can provide to both homegrown producers and the wider creative economy of Scotland. Currently we are of the view that any such changes would threaten these benefits, risk growth, and increase the regulatory burden on both production companies and PSBs. Indeed you heard from Pact during its appearance on 15 January that any such move had the potential to “stifle innovation.”

While we are not currently planning to review our regional production Guidance or the related quotas, we continue to engage constructively on all aspects of our regulation both in Scotland and across the rest of the UK to ensure our regulation remains relevant in a fast-moving environment. Indeed, we are actively looking at our wider regulation of broadcast TV and radio to ensure it continues to underpin innovation and growth and will consider any relevant evidence in response to our recent Call for Input into our Review of Broadcast Regulation⁵ in this space.

The BBC in Scotland

The BBC remains highly used in Scotland and is a valuable news source. Across 2024/25, 82% of adults and 66% of children in Scotland used the BBC each week, with audiences in Scotland having a positive perception of the BBC (61% of adults) and 56% saying they would miss the BBC if it wasn't there. While audiences in Scotland were less positive about the BBC than those in other UK nations at the start of the current Charter period, the recent figures now show that their views are broadly consistent with figures elsewhere in the UK.

The BBC has consistently met its production quotas which require 8% of network spend on and hours of production being attributed to Scotland. It does this with the vast majority of productions meeting at least two out of three of our criteria – substantive base, production spend and off-screen talent – in recent years. Between 2020 and 2024, 87% of BBC entries on Ofcom's Made Outside London Register assigned to Scotland met at least two out of three criteria in Scotland, with over half (57%) meeting all three. The Committee will be aware that the BBC last year announced changes to 'strengthen the impact' of its spend across the UK when it comes to TV production too.⁶

² <https://www.ofcom.org.uk/tv-radio-and-on-demand/public-service-broadcasting/public-service-media-review>

³ <https://www.broadcastnow.co.uk/bbc/fewer-bigger-better-kate-philips-unpacks-bbc-mantra/5190763.article>

⁴ Available [here](#).

⁵ <https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/call-for-input-review-of-broadcast-regulation/main-documents/call-for-input-review-of-broadcast-regulation.pdf?v=407889> b

⁶ <https://www.bbc.co.uk/mediacentre/articles/2025/strengthening-impact-bbc-network-television-investment-across-the-uk>

More widely, Public Purpose 4 of the BBC which requires it to reflect, represent and serve the diverse communities of all the UK's nations and regions is the lowest-rated of all the Public Purposes by audiences, with there being particular challenges among younger audiences and those in DE households who continue to rate it less highly than other audience groups. Our recent review into why there is lower satisfaction among audiences from lower socio-economic groups highlighted the BBC's perception as being 'London-centric' as being a particular challenge in connecting with audiences in the nations and regions.⁷

We note the BBC's commitment to represent and accurately portray different groups of society, with our most recent figures showing that 56% of adults in Scotland have a positive impression of the BBC's production of content that features Scotland. In the BBC's recent thematic review⁸, it recognised that although improvements have been made in representations of the devolved nations, it needs to better consider geography when making improvements in diversity. The BBC has committed to addressing this through both the programmes being made, and through having a spread of talent, including senior editorial staff, independent local production companies, and skills development programmes out of London.⁹

Finally, we know the value of returning series in both supporting the creative sector and delivering positive portrayal and representation in Scotland and are aware of the strength of feeling from the Committee on the ending of *River City* later this year. My colleagues visited the production of *Counsels* towards the end of last year, which is one of the three dramas announced to replace *River City*, and it was great to witness firsthand the breadth of talent from Scotland working on that production and hear about the positive initiatives driving skills and talent within the production sector. As you heard from Screen Scotland last month, drama in Scotland is in a good place right now and we share the hope that the BBC's new drama slate will add to the mix of returning series already popular with audiences such as *Shetland*, *Dept. Q* and *Vigil*.

Ofcom in Scotland

Ofcom's presence in Scotland has grown significantly in recent years, with around 120 colleagues now based out of Edinburgh and working across the entirety of Ofcom's remit. This gives us the platform to engage extensively with stakeholders from STV to Screen Scotland and independent producers as we fulfil our broadcasting responsibilities.

Our Proposed Plan of Work for 2026/27 sets out our wider priorities for the year ahead and in a broadcasting context, they fall under the theme of *Media we Trust and Value*. Specifically, it seeks to achieve the following outcomes:

- Audiences can find and access a wide range of content, including public service media (PSM) content that is produced across the UK and reflects its diversity;
- Audiences can find and access a plurality of news that is duly accurate, duly impartial and trusted;
- Media providers compete fairly and openly for audiences; and
- Audiences are protected from harm, and freedom of expression is safeguarded.

Ofcom is already implementing the Media Act which provides critical support for the PSBs, in particular through giving them greater flexibility to meet their obligations across their linear and

⁷ <https://www.ofcom.org.uk/siteassets/resources/documents/tv-radio-and-on-demand/bbc/bbc-audience-review/bbc-audiences-review?v=330487>

⁸ [BBC strengthens its approach to reflecting audiences and communities across the UK, following wide-ranging thematic review](#)

⁹ [BBC to increase spend on content representing nations as it strengthens TV commissioning across the UK](#)

online services and making their on-demand players prominent on connected TVs. We will also continue to publish our annual *Media Nations: Scotland* report to give an overview of both audience and industry trends across the broadcasting sector.

We also recognise that as audiences become more diverse in their preferences and where they consume content, both Ofcom and PSBs must adapt. Key priorities of our PSM Review included ensuring prominence and discoverability for PSM content on third-party platforms which can include testing new ways of distributing and creating content. PSBs are also required to be universally available. As viewers move online, they have to broadcast over Digital Terrestrial Television (DTT) while also investing in distribution across multiple platforms. We therefore require urgent clarity on how TV will be distributed in future in a way that will ensure audience-needs continue to be served.

Ofcom's work and continued engagement in Scotland will help shape all of this work for the benefit of citizens and consumers in Scotland and we will continue to keep the Committee across our publications as they happen.

STV News

During our evidence session last month, we discussed STV's financial position and the role it has played in the proposed changes it is seeking to make to its news provision. Our consultation highlights STV's adjusted operating profit and margin between 2019 and 2024, with the margin dropping from a high of 19% in 2022 to 11% in 2024. 2025 was forecasted to see a further drop in both, with adjusted operating profit going down from £21m to £12m and its margin dropping from 11% to 7%. STV's recent trading update¹⁰ confirmed that these forecasts are likely to be reflected in its full-year results.

Our consultation is now closed and we will share an update with the Committee once we have reached a final position on STV's request having considered all of the responses we received.

Yours sincerely,



Glenn Preston

¹⁰ <https://www.stvplc.tv/newsroom/2026/pre-close-trading-update-and-notice-of-results/>