

Speaking Up For Scotland's Screen Talent (SUSST)

Question	Your response
Question 1: Do you have any comments on our proposals and proposed draft Guidance for Original Productions and updates to the Regional Production Guidance?	I am pleased to note that: Page 23: 5.10 As discussed in a recent publication as part of our review of public service media, investment in first-run originated programming across the UK not only helps to develop production capacity, it is central to improving the authentic representation and portrayal of audiences. Given this, we do not propose to make changes to the current approach, which excludes repeats from counting towards regional production quotas. Page 43: A3.8 In implementing the Media Act changes allowing the licensed PSBs and S4C to use designated IPS content to meet their quotas, we have proposed: a) that content first provided on a designated IPS can only count towards the original productions quota through the use of online services once. b) that only the first release of a programme made available on a designated IPS can count towards the regional production hours quota, and

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	c) that the value of a programme first released on the designated IPS can only count once towards the regional spend quota. I wish to state that any move to count repeats towards regional quotas would be a disaster for the already struggling production communities, indies and off-screen talent, based in the N&R.
Question 2: Do you have any comments on our impact assessments underpinning our proposals, as set out in Annex 3?	While I am relieved that repeats will continue not to count towards regional quotas, the central challenge facing Scotland's (N&R) production communities is the current Regional Production Guidance itself. 1. The way in which the Ofcom Regional Production Guidance criteria are designed mean they are NOT fit for purpose in that they will never deliver on their stated aims to the extent they purport to. 2. The M25 is an entirely inappropriate marker on which to calibrate the provision of job opportunity for off-screen talent. 3. Calibrating the 50% off-screen talent quota 'by cost' is an ineffective methodology. Recent research by myself and Screen Scotland clearly shows how the system is being and has gamed by the PSBs for decades. It's taken over a year but the BBC has finally acknowledged there is a problem. Ofcom needs to do the same as a priority. 4. The problem is particularly acute with regard to above the line talent. For example, less than 38% of directors on ALL BBC scripted and unscripted productions in the 2023 Made Out of London Register marked as Scottish are based in Scotland. Ofcom's ethos of

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	'flexibility' serves Scotland's off-screen talent very badly. 5. Calibrating regional quotas by 'volume of hours' is likewise ineffective. 6. The Guidance promotes an obsession with Regional 'qualification' rather than 'origination'. The latter is the only way to ensure PSB spend stays in the N&Rs, (mine is Scotland), and actually promotes meaningful growth of the broadcast as well as ensuring there is a for level of job opportunity for off-screen talent based in the N&Rs. 7. Widely regarded as a farcical or cruel joke amongst Scotland's broadcast production community, the Ofcom Regional Guidance contains a succession of caveats that make a mockery of their stated aims. 8. To protect off-screen careers Ofcom should be adopting far more progressive strategies that compel the PSBs to commission more network productions from companies that are genuinely based in the Nations. 9. More rigorous regional 'tests' must be introduced. 10. The Regional Production must be reformed as a matter of urgency.