Consultation response form

Consultation title	Ofcom's proposed Plan of Work
Full name	[✂]
Contact phone number	[✂]
Representing (delete as appropriate)	Organisation
Organisation name	Advisory Committee for Scotland
Email address	[✂]

Your response

Question	Your response
Question 1: Do you have any comments on Ofcom's proposed Plan of Work 2024/25?	Confidential? – N

The Advisory Committee for Scotland (ACS) advises Ofcom about the interests and opinions, in relation to communications matters, of persons living in Scotland. This response from the ACS to the Consultation on the 2024/25 Plan of Work draws on the knowledge and expertise of ACS members and is informed by our individual experience and through discussion at our meetings.

We have identified 4 general areas that we believe Ofcom, both UK wide and in Scotland, should consider and ensure are part of the thinking behind the Plan of Work.

ENGAGEMENT
Whilst there are general engagement commitments throughout the plan, we would urge the Ofcom team in Scotland to consider how to get out of the Central belt and into those areas that are facing communication challenges every day. A physical outreach programme for the year would enable the team to meet face to face and hear lived experience from the consumers that we are trying to be supporting. It is likely that one visit to an island community would allow Ofcom to gather feedback on most of the areas that they regulate. The benefit to this approach was particularly evident during the Small Screen: Big Debate work.

The current discussion around postal services we believe would particularly benefit from a similar approach. We welcome the commitment from the Scottish team to:

'facilitate proactive engagement to ensure that the needs of Scottish consumers and businesses of the universal postal service are appropriately considered'

and we would urge that this proactive engagement is taken out of the capital city and into those affected communities.

Whilst we recognise the need for the formal consultation process, we would also urge Ofcom to consider how they connect with those consumers, directly affected with the regulation under discussion. This is particularly important as the consultations on Online Safety begin to be shared. There is obviously a great degree of detail required within this process, our question is how does Ofcom make sure that those consumers, who are interested and directly affected, also engage? Online Safety is a topic on everyone's agenda but not many of those individuals, families or households will be able to respond such a lengthy and challenging consultation. Engagement at this granular level needs to be considered and incorporated into an annual engagement plan.

LOCALNESS
Audiences in Scotland both need and want to see an authentic representation and portrayal of their communities across radio and our television screens. It is therefore important that Ofcom, and the Scottish team, continue to recognise localness as a benefit, rather than a burden. Most broadcasters will emphasise the way that local content allows them to connect with their audiences. However commercial pressures can push their strategy towards syndication and a more generic form of content.
50 years ago Radio Clyde was one of the first local commercial radio stations which brought local radio to Glasgow. Its immediate success was due to the fact that it spoke to its local audience from their own city. 50 years on that localness has almost disappeared from the main commercial radio organisations and is under threat within BBC Local radio.

We therefore look forward to the forthcoming consultation on Commercial radio local content which will consult on new 'localness' guidelines with a view to implementing a new regime for regulating local news provision on analogue commercial radio.

We would also urge the Scottish team to ensure that BBC Scotland continues to serve its local audiences under their new operating licence. The relaxation of quotas must not mean a reduction in local content. Last year we saw a very quick consumer backlash as content changes within BBC Scotland Radio were introduced. It is important that this is avoided in the future through consultation and transparency.

 We also look forward to the consultation on a new licence for C4. It is an important commissioner for the independent sector in Scotland and those commitments should not be diluted. We would expect the Scottish team to include this in their priorities.

Now that the government has published its Mid Term Review looking at the effectiveness of the governance and regulation, we look forward to Ofcom implementing the recommendations. We are particularly keen that the recommendation for more transparent engagement the BBCs Nations Members is followed up.

COST OF LIVING CRISIS

As the UK continues to struggle with a cost-of-living crisis, it is important that there is recognition that this can be particularly challenging for a number of Scottish communities. Rural and island living will be more expensive due to the cost of transport of goods/services and the lack of communication competition.

We therefore recommend that the Scottish team continue to monitor and respond to Scottish issues around affordability in telecoms and that they seek to improve awareness and take up of all helpful options, including social tariffs. We would recommend that they increase this awareness by working with government departments, consumer advocacy groups, charities, and other relevant stakeholders as part of a more general outreach programme.

For those Scottish households already in financial difficulties, the risks and impact of online scams and online fraud will be more extreme. We therefore appreciate the focus given within the Plan to this area through the commitment to raise awareness and improve information for consumers. However, involving key platforms in prevention from the outset should an integral part of the processes put in place through the new online regime.

The ACS has referred to, in the previous consultations, the compound effect for those Scottish consumers living in the more geographically challenging areas. Broadband connectivity, mobile options, broadcast service and ultimately financial difficulties will be interconnected for these households and we continue to advise that a holistic approach is considered at all times. We are heartened to see a growing appreciation of this convergence within the Plan.

RESEARCH, EVIDENCE AND MONITORING

We would urge Ofcom to commit to regional and national breakdown in whatever research or evidential work they undertake. Whilst this happens to great effect in certain areas (Connected Nations) it is not always the case. The ability to get to this granular level is key to understanding if/any differences exist across the country and we believe it is particularly important in the new area of online safety. It is critical that both the platforms' transparency reports and Ofcom's own reports provide an analysis of people's online experiences by nation. We feel it is important to understand the *Scottish* experience of online harms and protections. If the regulator, governments, and other stakeholders are not informed about how different communities experience harm online, they may not be able to respond effectively. Are Scottish consumers (eg young people in island communities) at a higher risk of online harm and scams than other areas? Ofcom is best placed to be able to investigate this in the absence of any current cohesive evidence base.

The ACS wonders if it is time for detailed research into service provider response to outages and performance degradation in rural areas, with the aim of coming up with better plans, further resilience and redundancy measures, and faster operational response time to such outages. We therefore look forward to responding to the consultation on resilience guidance. Scotland has a challenging landscape and climate, both of which have combined in the past year to create severe and sustained outages. As more of our life gravitates online, these need to be anticipated and managed efficiently.

Monitoring of all areas of Ofcom's regulation is also important to allow Ofcom to determine whether their approach or intervention is working. We understand that it may be difficult to draw a clear line between cause and effect but some element of measuring/assessment of outcomes would be beneficial to the Plan of Work overall. Ofcom is now in its 20th year. Does it consider the past 20 years to be a success? It would be useful for Ofcom, and the Scottish team, to reflect on the past two decades in order to inform plans for the next one.