

Consultation response form

Please complete this form in full and return via email to

BBCScotland.Assessment@ofcom.org.uk or by post to Glenn Preston, Ofcom, 4th Floor,
125 Princes Street, Edinburgh, EH2 4AD

Consultation title	Invitation to comment: Ofcom review of proposed BBC Scotland television channel
Full name	Dominic Bascombe
Contact phone number	
Representing (delete as appropriate)	Organisation - please provide the organisation's name below
Organisation name	National Union of Journalists, 114 Union Street, Glasgow G1 3QQ
Email address	
We will keep your contact number and email address confidential. Are there any additional details you want to keep confidential? (delete as appropriate)	Nothing
For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes/No

Your response

Question 1: Do you consider that the BBC's published proposals are clear in relation to their scale (both in terms of financial resource and in terms of reach and type of content) and the timescales for implementation? If not, please provide details of the areas where you feel more clarity is required.	<p>Confidential? – N</p> <p>The National Union of Journalists is an inclusive union and represents a broad range of media professionals including broadcast journalists working for the BBC. We strive to improve the pay and conditions of our members and protect and promote media freedom, professionalism and ethical standards.</p> <p>The NUJ has long called for greater investment in the BBC in Scotland. We believe it is inequitable that less than 73% of the licence fee raised in Scotland is</p>
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	<p>invested in Scotland.</p> <p>We welcome the proposal for a new channel for Scotland and the planned investment in journalists at the BBC.</p> <p>There has clearly been an imbalance in the investment provided to the BBC in Scotland and we believe that the proposal for this new channel will go some way towards addressing this.</p> <p>We welcome the proposal's detail on the scale, reach and type of content that will be part of the new channel and the creation of around 80 new jobs for journalists. We further welcome the opportunity for the BBC to develop a more representative workforce through the creation of these new jobs.</p> <p>We do believe that there will be a need for continuous investment and development of the current and news staff brought in as a result of the new channel and would urge the BBC to ensure that it has the requisite safeguards in place to ensure a happy and healthy workforce.</p>
<p>Question 2: Did the BBC's consultation process provide a suitable opportunity for you to set out your views fully? If not, please provide details.</p>	<p>Confidential? – N</p> <p>Yes we believe there was suitable opportunity to set out views in the consultation process.</p>
<p>Question 3: Because the BBC's proposal involves the introduction of a new public service channel, we do not consider that further analysis is required to determine materiality. If you disagree, please explain why you consider the BBC's published proposals are <u>not</u> material.</p>	<p>Confidential? –N</p> <p>We do not believe that there is a need for further analysis to determine materiality.</p>

Question 4: Please explain whether you consider Ofcom should undertake a BCA or a Shorter Assessment of the BBC's proposal.

Confidential? – N

Given the information set out by the BBC in its proposal and consultation stage, we believe that a Shorter Assessment would be most suitable. The proposal, whilst it does raise material issues, does set out an adequate level of response in how these will be addressed.

Question 5: Do you agree with the BBC's assessment in its public interest test about the potential public value and/or market impact of the proposal? Please provide any additional information you may have to explain your view.

Confidential? – N

The NUJ has had a good working relationship with the BBC in Scotland with full time officials and local reps afforded the opportunity to raise concerns through appropriate means. The NUJ in Scotland has consistently called for a greater investment in its Scottish output and the opportunity for Scottish content to be created and broadcast to a Scottish audience. We agree that the proposed new channel will bring increased public value for the BBC audience in Scotland in particular.

Question 6: Does this proposal highlight any significant market impact concerns which might affect your products and services? Please provide any additional information you may have to explain how you consider the launch of a new BBC channel for Scotland could affect you if it goes ahead.

Confidential? – N

We understand that there have been concerns from other interested stakeholders that the creation of new jobs for journalists at the BBC may have an impact on local newspapers. We do not necessarily share this view. The BBC clearly has an impact on other news providers and the content and manner of their distribution. We believe that the creation of new jobs for journalists will represent an improvement in the variety of work available for experienced journalist and provide opportunities for new journalists starting out in their career. What we have seen over the years has been decreased investment in local news by newspaper proprietors and the subsequent loss of jobs. This opportunity to create new jobs for journalists at the BBC is a very welcome opportunity.

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