

Gaelic Digital Service

Consultation on Provisional conclusions
Stakeholder Responses

Introduction

The BBC Trust has conducted a Public Value Test (PVT) into the proposal for a Gaelic Digital Service. The final decision was published in January 2008.

As part of the PVT process, the Trust published its provisional conclusions on the proposal in November 2007 and consulted on them for four weeks.

This document contains the full responses from organisations to the consultation.

Organisation responses in full

The BBC Trust received representations during the public consultation from the following organisations:

An Comunn Gaidhealach
Alasdair Allan MSP
An Lochran
Aros
Audience Council Northern Ireland
Audience Council Scotland
Bord na Gaidhlig
Canan Ltd.
Colmcille
Comann nam Parant Dhun-Eideann & Lodainn
Comhairle nan Eilean Siar
Commun na Gaidhlig
Eyeline Media Ltd.
Gaelic Advisory Committee
Gaelic Educational Trust
Gaelic Media Service
Gaelic Society of Inverness
Hecla Consulting
Highlands and Islands Enterprise
Highland Council
Isle of Gigha Heritage Trust
Jansvans
MacTV
NUJ
PACT
Pobal
Poetry Scotland
RSA
Sabhal Mòr Ostaig
Scottish Parliament Cross-Party Group on Gaelic
Scottish Screen
Scottish Screen Industry Summit Group
University of Strathclyde
Voice of the Listener and Viewer

One organisation wished to remain anonymous.

Anonymous

1. Absolutely not. This ought not be the main focus of a broadcaster, nor the main factor which determines whether this service should be approved. This is the business of the Scottish Government, who have established Bord na Gaidhlig to coordinate all the Gaelic agencies, and with responsibility for education and increasing the number of Gaelic speakers. It is for Bord na Gaidhlig to formulate the strategies which will reverse language shift, not the Trust of the BBC.

2. Given your premise that: unless a significant number of new speakers can be attracted, then the proposal is rejected, then all conditions proceeding there from are flawed. Undoubtedly, a Gaelic service would have a very significant impact upon the prestige attached to the language, particularly by each new generation. How to measure the impact of increased prestige onto the expansion in the number of new speakers is next to impossible, in the time-frames being suggested here.

3. Would you care to calculate what Gaelic speakers have paid in licence fees since the Corporation began, for which they received no dedicated service, and compare that with sufficient public value for money?

4. I currently don't watch television. I would be attracted to do so by a dedicated Gaelic service. 80% of our household use Gaelic, two do so fluently.

5. It won't be enough to stop the enemies of Gaelic from ceaselessly criticising the fact there's any programmes not in English on the BBC. A separate service would provide stability and reduce this kind of attack, since Gaelic programmes would not be viewed in competition to English language programming. We need quality original programmes of the widest possible variety. If you have it in English there should be potential for the same to be available in Gaelic: though quality much be the key factor.

6. Broadband

7. I'd prefer there to be a choice of Gaelic programs at any one time and a different channel, with a distinctive identity would provide variety. Isn't that what viewers want, whatever their language of choice?

8. Our company trains tutors to deliver Gaelic classes to adults. The appropriate use of new technology is vital to broadening the range of access, particularly through distance-learning and reaching the international market. Broadcasting can make a very valuable contribution to this, in that it provides one of the main stimuli to learn the language as well as bringing Gaelic regularly into non-Gaelic homes, thereby helping with acquisition. And a programmes aimed at Gaelic learners could do an immense amount of good.

10. No. Education is not your main business in English; that's entertainment and information. So, why single out education to be your priority for Gaelic, unless it's a way of politely rejecting the proposal to provide a fully integrated service? Gaelic will always lose the numbers game. A better principle to apply would be: what effect would there be upon

existing Gaelic speakers and their transmission of the language to others, if this most flexible and influential medium remains effectively rationed to a minimum?

11. The value of Gaelic lies in its distinctiveness, not in its number of speakers. Like any endangered entity, it has lost control of the conditions that in the past allowed it to flourish. Television, in particular, has the capacity to have a very considerable impact upon perceptions of a language's status - S4C and indeed Radio nan Gaidheal, are success stories and have hugely influenced both Welsh and Gaelic for the better. What is there to debate further? S4C has clearly helped in reversing language shift and bringing new speakers to that language. Does the trust serious doubt the same would not happen for Scottish Gaelic?

ACG

As President of An Comunn Gaidhealach (ACG) – the membership organisation that organises the annual Royal National Mod in Scotland, the premier festival celebrating Scottish Gaelic language and culture, I would like to respond as follows to the current consultation process in relation to the proposal to set up a Gaelic Digital Service. It should be noted that ACG has a membership in excess of 2500 and this extends not only to those living in Scotland, but throughout the UK, and worldwide. Many members access Gaelic information – radio and television programmes via the internet, and actively contribute in various ways to the maintenance and development of the language and culture.

1. Do you agree that the BBC Trust is right that more focus is required on the educational aspects of the proposed service and also on how it will achieve a wider appeal in Scotland? An Comunn Gaidhealach (ACG) believe that the proposed Gaelic Digital Service (GDS) will include a strong focus on educational programmes particularly for younger viewers.

Examples of programmes with an educational perspective and with popular wider appeal include Eorpa, Tir is Teanga, and Rapal TV. Eorpa, consistently reaches a wider audience than Gaelic speakers and has attracted the interest of non-Gaelic viewers because of its distinctive and high quality approach to current affairs. The most regular daily provision for Gaelic on TV over the past 20 years has been the area of pre-school children's programmes. These are often watched by children with no Gaelic. The provision of a GDS would increase the actual reach of these programmes considerably.

Clearly, the current proposal for limiting the platform availability at launch by delaying DTT distribution till 2010 at the earliest, will restrict the reach of the service and reduce the potential audience at least until that time. Since the Trust has highlighted how the educational strategy will be delivered as the key to the public value of the service, we are keen to stress the need for maximum platform distribution at launch. We don't believe that it is fair for the Trust to expect that the new digital service will by itself create new speakers of Gaelic, but it should complement existing and future outreach work aimed at creating and increasing the number of Gaelic users.

With its experience of programme-making, the BBC is in a good position to produce good Gaelic educational programmes, and indeed these help to stimulate interest in the language because of their visual appeal. This level of interest should be considered in the light of the relatively low proportion of air time that is currently allocated to Gaelic programmes. Furthermore, the return of the Jam materials would also increase the potential educational benefits of the GDS.

2. Do you agree with the BBC Trust's decision that if the additional evidence requested is forthcoming and satisfactory, the Trust can approve the new BBC Gaelic Digital Service, subject to conditions outlined in the Trust's report of its provisional conclusions?

ACG would be happy to see approval being granted under these terms.

4. As an individual, do you believe that a service with the conditions suggested by the Trust would appeal to you either as (a) a Gaelic speaker, (b) a learner of Gaelic or (c) someone with a wider interest in Gaelic or Scottish culture?

ACG believes that the GDS will not only build on the already existing audience participation in Gaelic services but also extend it. Research evidence reveals strong support for Gaelic television programmes from both Gaelic speakers and Gaelic speakers interested in learning the language or interested in its Gaelic culture. The music scene in Scotland is a good example of this, and hopefully the Gaelic service would take full advantage of these opportunities.

5. Do you believe that the additional incremental spend by the BBC each year of £2.5 million plus distribution costs would create sufficient additional public value to justify this investment? Multi-media services are expensive to create and maintain. We believe that it is essential to the future development of the Gaelic language and culture that such a service is provided and adequately funded. The annual incremental investment of £2.5 million is therefore fully justifiable in meeting the public value test. The involvement of the BBC will bring added expertise to the provision of a GDS in addition to the financial commitment of this incremental spend. This sum should be provided by the BBC irrespective of whether or not the GDS becomes a BBC licensed service.

6. If you are a potential user of the service, what means of access (satellite, cable, Freeview, broadband) would be the most convenient to you? Despite the trend for more internet access, we remain convinced that in the Scottish Gaelic situation there is still a compelling case for a linear television channel with scheduled programmes and that broadband should be used to support the television channel with programme information. The benefits of a linear channel include the status and standing it will give the language, especially in the public arena. It would create one place where viewers know they will find Gaelic content. The GDS must be carried on Freeview at the earliest opportunity i.e. as soon as new capacity is freed up. Freeview is likely to be the means by which the majority of people in Scotland are likely to access free-to-air channels in future years.

7. Do you believe the withdrawal of the Gaelic zones on BBC Two is an appropriate measure if a Gaelic DTT (Freeview) channel is established?

We are concerned that some viewers to Gaelic programmes may be lost through the withdrawal of Gaelic zones on BBC2, in that a number of viewers may come across Gaelic programmes on BBC2 who would not necessarily turn to a dedicated Gaelic channel. It is also important to maintain close links between the GDS and BBC1, BBC2 and BBC

education so as to capitalise on the BBC/GMS partnership which would then enable coverage of popular public events like Pipe Band Championships, Pop concerts, sporting events, the Edinburgh Military Tattoo, Parliamentary broadcasts etc. These could be presented very successfully with Gaelic commentaries. Emphasis on Scottish/Highland issues will create unique selling points which will draw audiences from beyond the Gaelic community. There are also opportunities for cross-promotion and content-sharing with other BBC channels e.g. BBC2 and BBC4 which both broadcast The Highland Sessions (broadcast in Gaelic as Comhdhail Cholm Cille).

10. Do the conditions proposed in the draft BBC service licence seem appropriate? The availability of DTT should not be delayed.

11. Are there any other issues you would like the BBC Trust to consider in relation to the proposal?

Ideally, we would like to see the BBC being an active partner in the service partnership considering the immense experience and resource facilities that they have. A partnership between GMS and the BBC allows GMS to continue to support the development of the Gaelic independent production sector. The proposals provide a significant opportunity for support and outreach for the Gaelic language and culture and it is vital that the BBC Trust gives the proposed digital service its approval.

Alasdair Allan MSP

1. I agree that one of the primary focus's of any Gaelic digital television channel should be on educational aspects to help support the many children in Scottish schools who are currently going through Gaelic education to help strengthen the number of Scottish Gaelic speakers and their levels of fluency. It would also help to educate the greater Scottish public about the Gaelic language and culture. It is correct to say, as well, that the wider the appeal of the channel is made across Scottish society, with the focus remaining on original Gaelic content, the better in the long term.
2. I believe that the BBC Trust should approve the new BBC Gaelic Digital Service.
3. I believe that the Gaelic Digital Service is one which is urgently required to help and support this historic and fragile language and the service should not be considered simply on the basis of how many viewers it will attract or cost alone.
4. I believe that the service would appeal to me personally as a Gaelic speaker, but that it also has a great potential to appeal to members of all three of these categories.
5. I believe this is an appropriate investment and a relatively small amount to pay for the supporting of an entire language and culture.
6. The most convenient means of access would be Freeview.
7. I believe that in return for a Gaelic Digital Channel supported by the BBC with a reasonable amount of original content then this would be an appropriate measure.
10. The conditions in the draft BBC license seem appropriate, though it would be more convenient if the service was available immediately on Digital Terrestrial TV and instead of waiting until the digital switchover occurs.

Additional email

I have recently filled in the online consultation form on the proposed Gaelic digital television channel and I am strongly supportive of such a channel.

I would like to make one more point regarding Manx Gaelic speaker's access to the service, which I have recently received representations regarding. I would just like to know if these speakers have been considered in the proposed new channel?

In thinking about the feasibility of a Gaelic digital television station it may be worth bearing in mind that there are upwards of 2,000 speakers and learners of Manx Gaelic who would very much appreciate access to such a service.

Manx Gaelic is the closest Celtic language to Scottish Gaelic, and speakers can generally understand spoken Scots Gaelic. The grammar is 95% the same, and, although the pronunciation is quite different, the vocabulary is 90% the same too. There is very little BBC or broadcasting services for Manx Gaelic and I am sure a Gaelic TV service would be

watched by Manx speakers and therefore may increase the feasibility of such a service. This issue is not just important for Scotland.

An Lòchran

Question 1. Do you agree that the BBC Trust is right that more focus is required on the educational aspects of the proposed service and also on how it will achieve a wider appeal in Scotland?

Gaelic is an important part of Scottish life and cultural heritage demonstrated by the implementation of the first National Plan for Gaelic earlier this year. Within the National plan there is a national strategy for Gaelic education, which, without a broadcasting platform, would seriously impair the effectiveness of the strategy. Gaelic programming is already a resource used in Gaelic medium education, and developing learning resources online for children and learners, and fits well with the BBC's purpose of 'promoting education and learning'. Over the years, the BBC has developed and enhanced Gaelic education through first rate programming, and the proposed service, in our view, will continue to do so. In An Lòchran's view, there is an increasing awareness and interest in Gaelic language and culture out with the Gaelic speaking communities, and broadcasters have maximized on this by programming popular subject matter, and the use of subtitles. The coverage given to Gaelic music such as the MOD, has sparked an interest by non Gaelic speakers and the proposed new service has the potential to reach out to a Gaelic and non Gaelic audience.

Question 2. Do you agree with the BBC Trust's decision that if the additional evidence requested is forthcoming and satisfactory, the Trust can approve the new BBC Gaelic Digital Service, subject to conditions outlined in the Trust's report of its provisional conclusions?

An Lòchran agrees that if the additional evidence requested is forthcoming and satisfactory, the Trust can approve the new BBC Gaelic Digital Service, subject to conditions outlined in the Trust's report of its provisional conclusions?

Question 3. Do you agree with the statement that if the additional evidence requested is not forthcoming then it is unlikely that the service will create sufficient public value for approval?

An Lòchran does not agree with this statement. The proposed service is distinctive and will also nurture new talent and create opportunities for artists, writers and performers towards 'stimulating creativity and cultural excellence.'

The proposal accords with recent Government initiatives to support and promote Gaelic language and culture eg the establishment in 2002 of a national agency (NDPB) for the language, Bòrd na Gàidhlig, the Gaelic Language Act 2005 and the publication of a National Plan for Gaelic earlier this year. It will also help the UK Government meet some of its obligations under the Council of Europe Charter on Regional and Minority Languages.

Question 4. As an individual, do you believe that a service with the conditions suggested by the Trust would appeal to you either as (a) a Gaelic speaker, (b) a learner of Gaelic or (c) someone with a wider interest in Gaelic or Scottish culture?

The proposed service would appeal as a learner of Gaelic and someone with a wider interest in Gaelic and Scottish culture.

Question 5. Do you believe that the additional incremental spend by the BBC each year of £2.5 million plus distribution costs and a total spend on Gaelic services by the BBC of up to £14.7 million per year is an appropriate investment? If the money were to be spent elsewhere what other priorities would you attach to it?

In our view, the proposed new service will deliver greater public value to its audience, and by pulling together all the different strands of Gaelic broadcasting into a dedicated service, it will ultimately increase investment that would not otherwise have been possible.

Question 6. If you are a potential user of the service, what means of access (satellite, cable, Freeview, broadband) would be the most convenient to you?

Freeview and broadband.

Question 7. Do you believe the withdrawal of the Gaelic zones on BBC Two is an appropriate measure if a Gaelic DTT (Freeview) channel is established?

An Lòchran would like the Trust to consider the importance of maintaining Gaelic on whatever the most prominent channels are in a post-digital world. In our view there is a danger that Gaelic could become marginalised if confined to a channel, and we feel that Gaelic should be part of the constant diet of popular channels.

Question 8. We would be particularly interested in responses from potential educational partners and others involved in the promotion of Gaelic about your views on the possibilities to work in partnership with the GDS.

An Lòchran exists to develop and promote Gaelic language and culture. We have been particularly successful in the ground breaking drama 'There's no V in Gaelic' and the celebration at the Royal Concert Hall of the songs of the Gaelic rock group 'Runrig'.

The proposed new service will allow the delivery of a wider and more diverse range of high quality programmes than is available at present, through developing new talent, sharing of ideas and artistic expression, stimulating creativity and cultural excellence and the creation of new Gaelic material. An Lòchran would be keen to work in partnership with GDS in nurturing new talent through drama, music and visual arts.

Aros

As an business involved with the promotion of Gaelic, particularly through the arts, I would like to make the following comments in relation to the proposed Gaelic Digital Channel.

Broadcasting has a critical roll to play in the development of the Gaelic language. In particular the scope for educational content through programming, web-site and other digital media such as mobile phones is immense. All of us have come to expect access to new and innovative opportunities of communication and Gaelic speakers are no different.

This opportunity of providing for the wider community, not just Gaelic speakers, can already be demonstrated through the viewer figures for programmes going out on BBC2. A service which should continue once the Gaelic Digital Channel hopefully becomes available.

The buzz word at the moment coming from the Scottish Government, through Bòrd na Gàidhlig is 'normalisation'. In order to instil confidence in our communities and young people in particular, people need to see that they are not at a disadvantage using or being educated through Gaelic. Gaelic speaking youngsters need access to the same services as everyone else though their indigenous language. The opportunity to play games on-line, to interact with others and to relate to current day activities and developments is crucial to the Gaelic language. The Gaelic Digital Channel has an important roll to play in this and indeed could be taking the lead.

Furthermore, there will be employment opportunities and again this is needed in the Gaelic speaking areas. Linked to employment is training and the possibilities that come from that in personal development and confidence.

The cost of this channel is well worth the investment as it will reach a wide audience, will invoke confidence, will create further development and could be the single most important development in the future of our language.

Could I ask the Trustees to seriously consider this as something that is crucial to us and something that indeed we expect to come from the BBC, who have served the Gaelic speaking communities well, in the past particularly through radio.

Audience Council Northern Ireland

The Audience Council for Northern Ireland made a submission to the Trust's Public Value Assessment of the proposed Scottish Gaelic Digital Service in September 2007. Council warmly welcomed the proposal.

Council has considered the BBC Trust's Provisional Conclusions on the proposed service. It notes, in particular, the Trust's view that further evidence about the educational strategy and plans to recruit new users is required to enable the Trust to approve the proposed level of investment. Council particularly wishes to address this approach in its submission to the Trust's second stage of consultation.

As articulated in its first submission, Council believes that a Gaelic broadcasting service is critical to the survival of Gaelic as a living language. Gaelic represents an ancient, unique and fragile thread of the UK's culture. The BBC, as the only viable non-commercial public service broadcast provider in the UK, is possibly the only institution which has the resources to maintain such a service for Gaelic.

Council further notes that the BBC's commitment to supporting indigenous minority languages recognises the corporation's crucial role in safeguarding this key aspect of the UK's indigenous culture. It is the fragile and threatened nature of the language which makes such intervention at this point crucial. Council would therefore be very disappointed if approval was not granted for a service of sufficient scope to meet this challenge.

Nonetheless, Council does agree that a robust strategy to encourage more speakers is central to the vision for the proposed service. As with any investment of public money, Council would like to be assured that value for money can be demonstrated and clearly defined results delivered against the objectives of the service.

Council reiterates the importance and urgency of safeguarding this threatened aspect of the UK's culture. It believes that the proposed service generally offers the range and depth required to provide the level of stimulation and growth necessary to achieve this vision. It is important that this particular - and perhaps unique - opportunity for an innovative partnership and multiplatform proposition is seized. To that end, Council advises that work to ensure that the strategy for education and outreach is sufficiently developed to enable approval to be granted, thus demonstrating value for money and ensuring that the vision for the proposed service is deliverable.

Council acknowledges the difficulty in approving the proposal should the Trust fail to be persuaded that Gaelic is at the brink of irreversible decline and the proposed new service could help stabilise the Gaelic speaking community and recruit new speakers. However, it remains firmly committed to the BBC playing a key role in safeguarding the UK's indigenous minority languages, and recognises the particularly vulnerable state of Gaelic in Scotland. Council is therefore very clear that, if this particular proposal is not approved, robust alternatives should be developed as a priority.

Audience Council Scotland

The Trust's decision

The Council welcomes the essentially supportive nature of the Trust's provisional conclusions on the GDS proposal, and acknowledges that further evidence of a strategy for new speakers and wider audience appeal will be valuable.

Although the Council believes that the service's core purpose is to offer the Gaelic community the level of service offered to English speakers by the BBC's English language services – a question of parity – it recognises that Gaelic is in danger, and that encouraging new speakers and wider awareness of the language and culture among non-speakers are measures which, taken together, can greatly assist the revival of the language.

The Council acknowledges that in raising these issues, the Trust is seeking to increase the level of support offered to the language by the proposal. The Audience Council for Scotland has full confidence in the professional competence and capability of BBC Scotland to respond to these issues raised by the Trust.

While welcoming further evidence, the Council remains supportive of the proposal in its original form. It acknowledges that there is a section of opinion in Scotland which is not in favour of the proposal. However it seems clear from research commissioned by BBC management, and confirmed by subsequent research commissioned by the Trust, that the bulk of the Scottish audience is in favour of the BBC/GMS proposal. The Trust's own research indicated that 63% of people in Scotland believed that the GDS was "something the BBC should be providing". A similar percentage thought that the proposal (which was presented alongside its costs) "represented proportionate provision for a minority language".

Strategies for education and for wider appeal

The Council will welcome the further evidence from BBC management, but does not share the Trust's view that approval of the proposal should be conditional upon it. In the provisional conclusions the Trust requires further evidence on certain specific educational aspects, but does not take sufficient account of the overall educational value the service will offer by its very existence.

Attendees at the Audience Council meeting in Skye felt that the overwhelming benefit of the service would be the opportunity for speakers and learners to immerse themselves in the language. The Council believes that the existence of the service should not be conditional upon the delivery of these useful but subsidiary educational benefits.

Requirements for specific educational outcomes and wider general appeal are included in the draft Service licence, and could be a matter for performance monitoring after establishment of the service, rather than conditions for approval.

The Council appreciates the indirect benefits for the language community of seeking a wider appeal for the channel, but stresses that the core purpose of the service should not be compromised in the attempt. The Council has heard strong views expressed in some

quarters of the Gaelic community that the conditions set for the GDS in this respect go beyond those set for other BBC services. It was felt that Radio 3 was not required to appeal to sections of the audience beyond those with a natural affinity for its core subject matter of music and culture.

The Council acknowledges the strength of feeling on this issue, but as noted above feels that the Trust's response is essentially supportive. Receipt of further evidence on the issues raised by the Trust will strengthen the service proposal and ultimately benefit the language community.

Level of investment

The Trust states that the evidence presented to it is “not sufficient ... to justify the level of investment proposed”. The Council has reservations about the manner in which the costs of the GDS were presented, which may have had the effect of inflating the apparent cost of the GDS as reported in the media.

The Council commends the rigour with which the PVT has been conducted. It believes the PVA has demonstrated that the GDS is likely to deliver a very high level of public value for a comparatively small increase in investment of licence fee funds in Gaelic content.

However it notes the comment made at the meeting in Skye that setting ‘cost per viewer hour’ as a criterion (and performance measure) for the GDS raises questions about the extent of the Trust's commitment to serving small audiences.

Distribution on DTT

The Council believes it is important for the Trust to press for distribution of the GDS on DTT from the earliest opportunity. The PVA states at 5.8.1 that “the [BBC's] public purposes can only be delivered if the service is accessible to target audiences on platforms which are relevant to their lifestyles and at a sufficient level of quality”. Approximately half of Scotland's Gaelic speakers live in the central belt, where DTT remains a dominant means of transmission, and a significant proportion of these could be denied the service if it were distributed via satellite and broadband alone.

The Council agrees with the suggestion by Bòrd na Gàidhlig that “the option of broadcasting on the web should only be considered as complementary to the dedicated digital service, and not as an alternative”. The broadband seven-day catch-up service, while welcome, is no substitute for a universally available means of transmission.

The Council concluded its earlier submission by expressing concern that “as many Gaelic speakers as possible are able to access the service from launch” and by urging the BBC to “explore the possibility of a presence for the service on Freeview, in some shape or form, from as early a date as possible”.

In its provisional conclusions the Trust identified maximising reach as a major priority. As noted above, the ability of speakers and learners to immerse themselves in the language has been identified as perhaps the single over-riding educational benefit of the proposal. It

follows that, to be fully effective, the service should be made available on as many channels of distribution as possible.

BBC Two Gaelic zone

The Council believes the Trust is right to question the proposed withdrawal of the Gaelic zone from BBC Two Scotland upon the GDS becoming available on DTT. At the consultative event in Skye, and elsewhere, there were concerns that the loss of the zone could leave Gaelic television in a 'digital ghetto'.

The Council believes that the zone will remain a valuable means of maintaining the broader audience reach to which the Trust aspires for the service. It is likely to become, in time, the only place on UK television where Gaelic content is regularly on display for the mainstream audience and the Council believes that this valuable 'shop window' for the language and culture should not be lost.

Conclusion

The Trust has a duty to scrutinise new BBC services and the Council commends the speed and sophistication with which the Trust has carried out the PVT process regarding the GDS. The Council believes that the establishment of a Gaelic channel is one of a number of pressing priorities for audiences in Scotland, and that the joint BBC/GMS proposal will offer greater value than any other possible option. Plans for a channel have been subject to considerable delay, for reasons unconnected with the Trust. The Council recommends that the Trust and the BBC demonstrate all possible expediency in implementing the current proposal on the major channels of distribution.

Bord na Gaidhlig

Introduction and Background to Bòrd na Gàidhlig & The National Plan for Gaelic

1. Gaelic is an integral part of Scotland's identity and providing a sustainable future for Gaelic in Scotland is a stated policy aim of the Scottish Ministers. Significant progress has been made in recent years to enhance the status of Gaelic, to expand the provision of Gaelic-medium education and to establish a Gaelic digital television service. Census figures demonstrate very clearly, however, that there is no room for complacency and that the position of Gaelic in Scotland remains fragile.
2. A key milestone in Gaelic development was reached when the Scottish Parliament passed the Gaelic Language (Scotland) Act 2005. The 2005 Act established Bòrd na Gàidhlig (the "Bòrd") as a statutory body charged with securing the status of Gaelic as an official language of Scotland commanding equal respect to English. The Bòrd has specific statutory functions to promote, and to provide advice to Ministers and public bodies on matters relating to the Gaelic language, Gaelic culture and Gaelic education. The Bòrd is required to exercise these functions with a view to increasing the number of users of Gaelic, and with a view to encouraging and enabling increased access to and understanding of Gaelic.
3. The 2005 Act, places a duty on the Bòrd to produce a National Plan for Gaelic, and this key policy document, approved in March 2007 provides a blueprint for the future development of Gaelic. The National Plan is underpinned by four well-established and interrelated language planning principles and makes recommendations on how to support Gaelic in the home, community, workplace and place of learning through language acquisition, usage, status, and corpus development.
4. Successful implementation of the priorities identified in the National Plan will require the proactive engagement of government, public bodies, local authorities and the private and voluntary sectors. The National Plan priorities act as a guide for public bodies to consider what their contribution to Gaelic development should be. The Bòrd notes that the BBC's six public purposes support and complement our vision and priorities as set out in the National Plan.
5. Gaelic broadcasting has a vital role to play in sustaining and revitalising Gaelic language and culture. The Gaelic Digital Service will raise the profile of the language and will help unite the scattered Gaelic communities in Scotland, the UK and across the world. It will deliver a service into the homes of those wishing to access it and will promote the positive benefits of Gaelic described in the National Plan. The Gaelic Digital Service is a vital contribution to the delivery of the National Plan and will positively encourage language acquisition and usage.
6. The Gaelic Digital Service will also create significant employment opportunities, increasing artistic and technical skills, stimulating parents' interest in Gaelic education, appealing to and serving adult learners, and strengthening Gaelic usage in extremely important media.

Current position:

The Bòrd responded to the recent BBC Public Value Test & Ofcom Market Impact Assessment consultations and strongly supported the case for a Gaelic Digital Service concluding:

‘.....the Bòrd views the Gaelic Digital Service as a very positive development that will assist us in implementing many of the National Plan priorities. It will also fulfil the Council of Europe requirement to support ‘the creation of at least one radio station and one television channel in the regional or minority languages’. The strength of the Gaelic Digital Service lies in the partnership model being proposed by GMS and the BBC.

‘The aggregation of GMS and BBC resources within a cohesive digital service will offer much greater value to the wider Gaelic community for the financial investment being made. As a public service provider, the BBC has a duty to provide regional and minority language support and the Gaelic Digital Service has the potential to place the BBC / GMS partnership in the vanguard of developing an excellent example of how a language and culture can be supported and revitalised. As a UK broadcaster the BBC will now be able to serve the Gaelic audience outside Scotland, at times when they are available to view. The effect of this will be that the public will get much better value for money from the aggregated, more cohesive, public investment of BBC and GMS funding. Finally, as a member of the GMS board, Bòrd na Gàidhlig is looking forward to being actively involved in the development of the new Gaelic Digital Service.’

Since then the BBC Trust has rejected the initial partnership proposal for the Gaelic Digital Service and gone back for further consultation.

The Bòrd’s position:

The Bòrd reiterates its full support for a Gaelic Digital Service and its firm belief that it will not only attract new speakers and be of wider appeal throughout Scotland but that it, crucially, fulfils the requirements of the National Plan for Gaelic.

The National Plan for Gaelic is a statutory five year route map to sustain and develop the language and culture. It was published in March 2007 and sets out a series of key performance indicators for the Bòrd to meet in partnership with other public bodies, Gaelic organisations, community groups and individuals.

The National Plan has been agreed and signed off by Scottish Ministers and was a requirement of the Gaelic Language (Scotland) Act 2005.

Page 46 of the National Plan; Implementation and Key Projects, states:

- **the establishment of a national Gaelic Digital Service**

Delivery of a digital service is expected early in the life of the National Plan. The new service will help to unite the scattered Gaelic communities, and it will promote the positive benefits of Gaelic described in this Plan and positively encourage language usage and acquisition. The service will also create significant employment opportunities, increasing artistic and technical skills, stimulating parents' interest in Gaelic education, appealing to and serving adult learners, and strengthening Gaelic usage in extremely important media. Such a service is a vital contribution to the delivery of this Plan in helping to reach a dispersed Gaelic community and deliver a service into the homes of all those wishing to access it.

Therefore the Bòrd has always seen the establishment of a national Gaelic Digital Service as an integral part of the development of the Gaelic language and culture and views it as an important building block in fulfilling the objectives of the National Plan.

Education:

As the Bòrd outlined in its first consultation response, the Gaelic Digital Service will play an integral part in developing and supporting Gaelic education.

The recently published Bòrd Annual Report 2006 – 2007 stated:

'In the past year a number of important new developments were achieved in Gaelic education including the opening of Scotland's first all Gaelic primary & secondary school, Sgoil Ghàidhlig Ghlaschu, in Glasgow and the beginning of work on a new Gaelic school in Inverness.

'In addition to this, the number of pupils in Gaelic medium education continued to increase with 701 children registered for Gaelic pre-school education in 60 pre-school centres across Scotland, a rise of 60 children. The opening of new Gaelic medium provision at Millbank Primary School in Nairn brought the number of primary schools offering Gaelic medium education to 62 and the primary pupil numbers rose to 2,092 from 2,068. In 2006-2007 there were 293 pupils studying subjects other than Gaelic through the medium of the language, and 945 fluent speakers and 2,696 learners studied Gaelic as a subject in the same year. These figures were down slightly on the previous year totals and clearly indicate that the Bòrd, in collaboration with local education authorities, must focus attention on strengthening Gaelic medium secondary provision and increasing access for Gaelic learners. There are currently no accurate statistics on the number of primary pupils across Scotland learning Gaelic as a language in primary schools across Scotland through the Gaelic Language in the Primary School (GLPS) programme, however the number is estimated to be somewhere in the region of 5,400.

'In July 2006 the Bòrd announced the appointment of Rosemary Ward as its first Education Manager. In March 2007, the first National Plan for Gaelic and the National Gaelic Education Strategy were published. The latter document sets out the Bòrd's priorities for Gaelic education over the next five years.

'A total of 11 Gaelic primary probationer teachers and two secondary probationers embarked on their induction year in August 2006. In September 2006 the Bòrd welcomed Angela MacGillivray to the post of Gaelic Teacher Recruitment Officer. This post was established with funding provided by the Scottish Executive and confirmed its commitment and that of the Bòrd to increasing the number of Gaelic teachers in Scotland and raising awareness of the teaching opportunities that exist in Gaelic education.

'The Bòrd continued to work in partnership with the Scottish Executive, local authorities and education bodies to promote and develop Gaelic education and for the first time worked with the Scottish Executive Education Department on the management and allocation of Specific Grants for Gaelic Education.'

It is clear from this that education is central to the sustainability and then growth of Gaelic over the coming years and a partnership between the BBC and GMS would provide impetus, encouragement and no little benefit to this strategic goal by offering access to education opportunities for young and old alike.

National advertising campaign:

The Bòrd would envisage the Gaelic Digital Service dovetailing with its National advertising campaign aimed at promoting a positive image for the language. This is another key action of the National Plan for Gaelic and is expected to launch in 2008.

The campaign will raise awareness of the Gaelic language and culture while promoting learning opportunities on a Gaelic web portal. It will involve a strategic advertising campaign featuring billboard, online, print and broadcast as well as significant public relations input.

The Bòrd sees the Gaelic Digital Service as an important vehicle for and strategic partner in this campaign.

Research:

The Bòrd has seen new research commissioned by the Gaelic Media Service that indicates a wider constituency of Gaelic speakers, learners and supporters than previously understood. The research makes it clear that more people have an understanding of the language than current Census figures show. It has been known for some time that the Census does not provide accurate information about Gaelic and updating and improving the questions asked in future Census is another strategic target of the Bòrd.

If further evidence is needed, this research shows the wider appeal of Gaelic throughout Scotland and the potential for its growth through a Gaelic Digital Service. The Bòrd supports this research work.

Conclusion:

In conclusion, the Bòrd reiterates its position in its original consultation response namely that: 'The strength of the Gaelic Digital Service lies in the partnership model being proposed by GMS and the BBC.'

Statutory requirements such as the National Plan for Gaelic and Gaelic Language Plans, allied to our proposed National advertising campaign and the education imperative in everything the Bòrd does to develop Gaelic, dovetail neatly with what the proposed Gaelic Digital Service can achieve for the language and culture, raising awareness and attracting new speakers as well as demonstrating wider appeal.

We believe this can be done effectively by a partnership between GMS and the BBC.

Canan

1. It would be wrong for us to comment on the degree of focus that is required from a Trustees perspective and how much evidence was provided. However, we agree that the Trust is correct to focus on the importance of a new service to education and to the people of Scotland.

The service has the ability to significantly increase the educational opportunities for those who wish to learn, sustain or enhance their Gaelic. It also has the opportunity to provide learning opportunities through the medium of Gaelic, for Gaelic speakers. The educational value that the service could provide includes formal learning opportunities e.g. structured courses; information sharing opportunities through factual programming and encouraging participation and citizenship eg through sport, religious, democratic, political or music programming. Probably even more importantly, the service will allow incidental learning through hearing, seeing Gaelic being spoken and/or reading Gaelic, where the programme purpose is not to teach but the outcomes would include a confidence building, an increase in an individual's language capacity and a general normalisation of the language within Scotland - something that is particularly important for young people who want to share, experience and be entertained in the same way as everyone else, rather than stand out as being different.

There is also the opportunity to enhance educational provision and provide cost-effective value-add by providing support resources on-line and through the use of optional subtitling. We believe that the service should first and foremost be for the people of Scotland and the medium for that engagement is Gaelic. We believe that the service could and, indeed, must achieve that delivery aim.

We were delighted to hear on the news that 75% of people in Scotland believe that there should be a Gaelic service and that, we believe, reflects the general feeling that you encounter when undertaking any Gaelic promotional or educational work. A Scottish service in Gaelic should appeal to speakers, learners and, through subtitles, non-speakers interested in the programme content. As the Trust believes that there is sufficient evidence to support that the quality of the programming would be good, it really should also believe that the programming would therefore fit the interest of the market. If the service is made available through Freeview and the programme content is good, some promotion of the programmes should be enough to encourage wider viewing throughout the ! country.

2. We believe that the Trust should approve the service and agree with most of the conditions, other than we believe that the service should be made available on Freeview at the earliest possible opportunity - it being the way that most people will be able to access free viewing. We also believe that it not necessary, although desirable, that non-speakers feel committed to a Gaelic language channel. This requirement appears odd regardless of which language is involved, although particularly so for the national language of Scotland.

3. We do not agree with this statement. The inability of one group to provide enough evidence which wholly satisfies the Trust at this one point in time, does not mean that it is unlikely that the service will create sufficient public value

4. The concept of a Gaelic Digital Service is appealing to the Directors and staff of Canan, who include a mix of Gaelic speakers and learners at different levels from total beginners to advanced learners.

5. We believe that the level of investment would be a good start, but that further investment should be forthcoming, for the service to have a significant impact.

6. The most convenient access in the future would be through Freeview. We believe that although many people use satellite, almost through necessity, in the NW Highlands at present, that the service should be available through Freeview when switchover takes place. This would back up the Trust's own requirements for the service to be accessible to the whole population of Scotland. The biggest inhibitor to people using the service will not be a lack of marketing, but will be whether they can actually turn on their TV and a Gaelic channel being there

7. We consider that some provision on BBC 2 should continue, helping to provide BBC 2 with a continued interesting mix of programming. It would also act as a shop window for a Gaelic service.

8. We would be very interested in working in partnership with the GDS. Canan has been providing accessible on-line educational resources for a range of learning organisations (including Learndirect Scotland, Careers Scotland and Learning and Teaching Scotland) and for other organisations such as Highlands and Islands Enterprise and Highland Council.

We have also this year brought together a partnership of fourteen national organisations, including the Gaelic Media Service and the BBC, to participate in a fun, interactive Gaelic awareness and learning series called Air Splaoid! (the Big Adventure) www.bbc.co.uk/airsplaoid. Air Splaoid! was delivered through the BBC website and through Scotland's learning centres. Although the emphasis was on fun, particularly through the use of animated characters who participated in the celebrations of Highland 2007, the learning methodologies employed were strong, incorporating resources to fit five different learning styles. This was an initiative conceived and implemented by Canan, a small commercial company who also had to bring the partners together and seek all funding for the project. Gaelic Media Service was a major financial supporter of the programme. How much better it would be if this type of resource provision was part of a strategic plan for a GDS and for provider! s to be working directly with a GDS in the development and provision of educational resource. The BBC provides excellent educational resources, but partnership will best ensure that spend is cost-effective and appropriate, meeting the needs of the learners. It is also the way to increase innovation, test assumptions and provide fluid content. Educational resources need not always be expensive, but if not, they need to be current and appealing to the market on that day.

Over the years we have a very good relationship with Gaelic Media Service, who we have found are always open to new ideas and give them the consideration they deserve. GMS has funded Sgleog www.sgleog.com, an on-line site for Gaelic speaking teenagers developed mainly by under 30 year olds, for five years. The site encourages the young people to develop their media skills and provides them with an opportunity to use Gaelic in the same

way that they would use English on-line. We believe that the above examples show the potential for educational and promotional partnership opportunities within a new GDS and, from our experience, that the organisations involved would be open to such developments.

9. We believe that it is essential that the commissioning process is seen to be fair and transparent from the start - and that it should be predisposed to receive and encourage co-working with, and proposals from, the independent sector. This would also provide a ladder of opportunity for new people entering the industry. The BBC, itself, will need to ensure that it does not set its pitch as a competitor to independent production, but instead as an enabler. The structure of GMS, where it undertakes no production itself, ensures that the same issue does not apply. The same issue is encountered in learning where Learning and Teaching Scotland is a producer as well as a manager of commissions; whereas Learndirect Scotland does not undertake production itself and therefore plays more of a broker's role. There is no reason that this should be a problem for a GDS, but it should be addressed from the start, and I'm sure it will be.

10. The conditions proposed generally seem reasonable other, as has been noted earlier, other than the requirement for a total by-in by non-Gaelic speakers, the lack of a commitment to including a Gaelic Channel within Freeview at switch-over and the removal of programmes from the BBC 2 zone.

11. It would be extremely important for the Channel to go ahead, not just for the reasons stated earlier, but also as a key pillar within the effective delivery of the National Plan for Gaelic. Thank you for giving us this opportunity to respond.

Colmcille

Colmcille was established in 1997 by Brian Wilson, Minister for Gaelic and President Mary Robinson. Its aim is to promote links between Gaelic Scotland and Ireland. Colmcille is jointly funded by the Scottish Government, the Government of Ireland and the Northern Ireland Assembly. Its Board membership is drawn from Scotland, Northern Ireland and the Republic of Ireland.

It is a very, very easy thing to lose a language. All that is required is one short period of inattention or complacency, and the community can find itself with a generation of children none of whom speak the older community language. With that single break in the chain of generational transmission, language, and all that goes with it, becomes a walking ghost.

Professor James McCloskey, University of California, Santa Cruz, *Voices Silenced*, Cois Life, Dublin, 2001, 39.

Focus of this Response

Colmcille will concentrate on a relatively narrow area of the BBC Trust's Public Value Assessment. This document was produced in response to a proposal from the BBC Executive to establish a Gaelic Digital Service.

The Trust's decision on the Gaelic Digital Service hinges on its assessment of whether or not 'the proposed service would create public value by supporting the future of the Gaelic language and offering wider value to the audience in Scotland' (1.4). However, the Trust does not accept that the evidence presently before it 'would be sufficient to justify the level of investment proposed'.

The BBC already invests a relatively high spend per speaker on its Gaelic television service, and the Executive has argued for an increased spend on the grounds that "the endangered status of Gaelic provides strategic justification for increased investment in the language" (5.2.17). However, the Trust questions the claim that Gaelic is an endangered language, and is unconvinced by the evidence presented. The Trust does accept that, in a putative doomsday scenario "the proposed service could help stabilise the Gaelic speaking community and recruit new speakers", but argues that it "has seen no conclusive evidence that Gaelic is approaching, or beyond, the point of no return" (5.2.8).

Colmcille's response will address this key issue. We believe that there is compelling evidence that Gaelic is on the brink of an irreversible decline. In this we find ourselves firmly in support of the BBC Executive.

Among major organisations with responsibility for the Gaelic language, the BBC Trust may be the only one which remains to be persuaded of the fragile state of Gaelic in Scotland. This is not altogether surprising: few of the Trustees will have had the experience of belonging to marginalised linguistic minorities. Fewer will have had the experience of belonging to a language community that feels itself to be on the verge of extinction, and fewer still will have

any awareness of the social dynamics of a linguistic situation in which a bilingual minority language community interacts with monoglot speakers of the most powerful language in the world.

This submission attempts to give a broad-brush outline of the socio-linguistic realities of the present situation of Gaelic.

The present state of Gaelic

A hostile official policy since the late 16th century, allied with social marginalisation, land clearances, long-standing economic depression in the historic Gaelic-speaking areas and high emigration rates, as well as lack of support in the education system until recently have led to a progressive decline in the Gaelic-speaking population (see Appendix 1). In the 17th century Gaelic was the dominant language throughout the Highlands and western islands of Scotland. Even after a long period of relative decline, the 1891 Census identified more than a quarter of a million Gaelic speakers in Scotland, almost 90% of whom lived in historic Gaelic-speaking communities. By 2001, the Census recorded 58,652 Gaelic speakers. Gaelic has now almost disappeared as a community language from the mainland Highlands. Approximately half of Scotland's Gaelic speakers live in the islands, particularly the outer Hebrides. Most of the rest live in the industrialised central belt of Scotland.

Language loss: a rough guide

Tiny linguistic groups of a few hundred people could survive for centuries in the past if they were sufficiently isolated. In the modern world, however, globalisation has initiated an unprecedented wave of language shift, in which minority languages are disappearing at the rate of one a fortnight, as language communities are absorbed into larger, more powerful language communities. The following lengthy quotation from Professor David Crystal, author of *The Cambridge Encyclopaedia of Language* (1987, 1997), summarises the homogenization dynamic which threatens the survival of many of the world's languages. This process, we will demonstrate, is already under way in respect of Scottish Gaelic.

The centralization of power ... invariably results in an inevitable loss of autonomy for local communities, and often a sense of alienation as they realise they are no longer in control of their own destinies, and that local needs are being disregarded by distant decision-makers. The language of the dominant culture infiltrates everywhere, reinforced by the relentless daily pressure of the media, and especially television – an effect which Michael Krauss has likened to ‘cultural nerve gas’. ...

When one culture assimilates to another, the sequence of events affecting the endangered language seems to be the same everywhere. There are three broad stages. The first is immense pressure on the people to speak the dominant language – pressure that can come from political, social or economic sources. It might be ‘top down’, in the form of incentives, recommendations, or laws introduced by a government or national body; or it might be ‘bottom up’, in the form of fashionable trends or peer group pressures from within the society of which they form a part; or again, it might have no clear direction, emerging as the result of an interaction between socio-political and socioeconomic factors that are only partly recognised and understood.

But wherever the pressure has come from, the result – stage two – is a period of emerging bilingualism, as people become increasingly efficient in the new language while still retaining competence in the old. Then, often quite quickly, this bilingualism starts to decline, with the old language giving way to the new.

This leads to the third stage, in which the younger generation becomes increasingly proficient in the new language, identifying more with it, and finding their first language less relevant to their new needs. This is often accompanied by a feeling of shame about using the old language, on the part of the parents as well as their children. Parents use the old language less and less to their children, or in front of their children; and when more children come to be born within the new society, the adults find fewer opportunities to use that language to them. Those families which do continue to use the language find there are fewer other families to talk to. ... Outside the home, the children stop talking to each other in the language. Within a generation – sometimes even within a decade – a healthy bilingualism within a family can slip into a self-conscious semilingualism, and thence into a monolingualism which places that language one step nearer extinction.

David Crystal, *Language Death*, Cambridge University Press, 2000, 78-9

These processes have already taken place in most of those areas which were Gaelic speaking at the end of the 19th century. Although the last of the Gaelic heartlands have shown a remarkable resilience, they are now on the cusp of passing from Professor Crystal's stage two to stage three.

Scottish Gaelic has survived until now, in spite of massive external pressures, by being rooted in isolated, close-knit rural communities – it is no accident that Gaelic is now strongest in the Western Isles. Although weak on a national level, the language was locally strong. Extended families have also played a part in the maintenance of Gaelic: the role of the monolingual or near-monolingual grandmother in the home or next door, the unmarried uncle or aunt living with a family have all contributed to maintaining the language. There are now no monolingual speakers left. Another factor that helps sustain minority languages involves a certain linguistic momentum in which a less prestigious language may remain as the default community language out of habit. Community linguistic momentum is now weakening for a variety of reasons that will be discussed below.

Institutional support from within broader society can often make the difference between language survival and language death. Historically, the church, particularly the Presbyterian Churches which dominate the Highlands of Scotland, provided a high-status institution in which Gaelic was the main language used in certain communities. Church attendance is now weakening. The towns also tend to be Anglophone; many Gaelic speakers shopping in the main town in the Western Isles often speak English to each other for fear of a negative reaction from the urban sophisticates of Stornoway. English is the dominant language of the secondary schools which serve the Western Isles and Skye. Broadcasting in Gaelic, particularly on radio, has had a profound influence on maintaining the status of the language. However, this generalization needs to be modified. Listeners to the Gaelic radio service tend to be older members of the community, and the radio service does not attract younger

listeners. Gaelic television attracts viewers across the full age range, but the amount of programming directed at the critical cohort of teens and early twenties is so thin that it has very little impact on either attitude or language use.

The education system requires particular attention. Historically, schools have been used by the education authorities as nodes of Anglicization. Although Gaelic-medium primary education has been available since 1985 (well after it was available in Wales and Northern Ireland), and has had an important effect in maintaining the language, it is not universally available – fewer than a quarter of children in the Western Isles attend Gaelic-medium primary education. Some strong Gaelic-speaking communities have decided not to accept a Gaelic-medium stream because this would have created a redundancy in the local school, and a neighbour would have lost a job. Local social cohesion, which once sustained the language, is now beginning to undermine it. Gaelic-medium education, both in the Gaelic heartlands and elsewhere, also involves immersion education for children from non-Gaelic speaking homes. It should also be noted that the absolute decline in Gaelic-speakers in Scotland has followed the classical pattern of linguistic decline, with a preponderance of speakers in the older cohorts. Professor McKinnon, the leading authority in this area, has calculated that, to maintain the number of speakers of Gaelic at the level of the 2001 Census, at least 733 Gaelic-speaking children are needed in every year. Although, as we have seen, not all Gaelic-speaking children attend Gaelic-medium education, the numbers attending Gaelic-medium primary schools (2,092 in 2006/7) indicates that the language community will continue to shrink.¹

We will return to the dynamics of linguistic social interaction. While all Gaelic speakers are, of necessity, bilingual, English-speakers tend to be monoglots. Where a group of people are gathered together, some bilingual, some monolingual, the language of necessity is that of the monoglots, even if they are a minority. A language community in which a minority language is locally strong can cope with a certain proportion of monoglots without much difficulty, but beyond that they can tip the linguistic balance.

Within the family, a monoglot English-speaking parent can often lead to the dominant or sole use of English in the household. Even if they are brought up with both languages, the language patterns within the family will tend to weaken the default status of the weaker language both within and outside the family circle. Within a community, monoglot English-speakers have a surprisingly high impact on the habitual language of communal exchange outside the home (see Appendix 2).

The social patterns that sustained Gaelic for centuries are in a state of flux. Professor McKinnon's research has analysed patterns of language transmission as they appear in the 2001 Census. The following tables are based on his work, and demonstrate that there is a significant discontinuity in the transmission of Gaelic within the family. Most Gaelic-speaking parents now live with other non-Gaelic speaking adults. Of the 13,635 households with at least one Gaelic-speaking parent, almost two thirds have one parent (or other adults) who do not speak the language.

¹ All the statistics presented in this paper are by kind permission of Professor McKinnon, who heads up SGRÙD Research, www.sgrud.org.uk

Transmission of Gaelic within families (all of Scotland)

Family Structure	Number of households	% of children with Gaelic
All adults speaking Gaelic		
Couple	2,985	68.4
Single parents	1,702	34.0
Multiple households	257	65.3
Some adults speaking Gaelic		
Couple (one Gaelic-speaking parent)	7,928	21.2
Multiple households	853	21.0
Total	13,635	

Transmission of Gaelic within families (Western Isles)

	Number of households	% of children with Gaelic
All adults speaking Gaelic		
Couple	1,437	76.5
Single parents	307	50.5
Multiple households	126	81.4
Some adults speaking Gaelic		
Couple (one Gaelic-speaking parent)	1,209	36.9
Multiple households	115	44.3
Total	3,194	

Transmission of Gaelic within families (outwith the Highlands)

	Number of households	% of children with Gaelic
All adults speaking Gaelic		
Couple	769	54.3
Single parents	1,001	24.9
Multiple households	87	60.7
Some adults speaking Gaelic		
Couple (one Gaelic-speaking parent)	4,334	10.8
Multiple households	491	10.2
Total	6682	

The Western Isles, where community support is strongest, also shows a strong pattern of intergenerational transmission. Traditional extended families still exist in rural Scotland, and record the highest level of language transmission, with 81.4% of children being brought up in multi-generational households where all adults speak Gaelic are Gaelic speakers. Unfortunately, this is a tiny cohort, and involves only 126 households. Other family structures are less effective in language transmission, although in the 1,437 nuclear families in the Western Isles which both parents speak Gaelic, 76.6% of children also speak the language. The statistics tail off predictably with less traditional family structures: 50.5% of

lone Gaelic-speaking parents raise their children with Gaelic, 44.3% of children in extended families where some adults speak Gaelic have Gaelic-speaking children (presumably through the influence of grandparents). However, in nuclear families where only one parent speaks the language, only 36.9% of children are Gaelic-speakers. This pattern will not sustain the linguistic community in the Gaelic heartlands at its present level. The situation is even worse where there the language has a weak community presence.

Mobility is also a factor, in that Gaelic speakers now approach the national average in terms of their geographic mobility, more than 11% of them changing location every year. In 1881, 87% of all Gaelic speakers lived in Gaelic-speaking areas, while in 2001 just over half of the Gaelic speakers in Scotland live outside the traditional Highlands and Islands area, and do not have the support of a community if they wish to raise their children as Gaelic speakers. Increased mobility also brings large numbers of English-speaking newcomers to the Gaelic heartlands, which again destabilises the linguistic dynamic of Gaelic-speaking communities.

Society in Gaelic-speaking Scotland is in an accelerating state of flux and the linguistic community is not equipped to deal with many of the changes. Many of the old certainties have been lost, and social structures are changing rapidly. The falling away in church attendance has undermined the most significant institutional support for the language without being replaced by any other comparable institution. In spite of heroic efforts by a number of individuals and organisations, significant sections of the traditional linguistic community has become demoralised and lost cultural confidence. Local communities that found their strength in a sense of identity that had a language at its core now find themselves seeking a new sense of social cohesion that is language-neutral. Increasing educational opportunities with no corresponding increase in local employment opportunities have caused significant out-migration, and the new urban Gaelic-speakers have not yet found a coherent linguistic identity in their new setting.

Gaelic is at a critical stage, and could become unviable within a generation. The mass media is of incalculable importance in the maintenance of threatened languages and cultures. The proposed Gaelic service could play an invaluable role in restoring the confidence of the traditional Gaelic-speaking communities, in raising the prestige of the language among Gaelic and English-speakers, in providing support for that large cohort of Gaelic speakers who do not live in traditional language communities, and attracting new learners. TG4, the dedicated Irish language station has had a remarkable impact in Ireland, and has accomplished all the aims outlined above. Finally, to adapt the words of Finlay MacLeod, a dedicated service would give Gaelic the chance to live in its own light rather than in the shadow of another language.

Appendix I

Background

A little history may be useful here, as the Trust may not be aware that Gaelic has been subject to political, social and economic pressures for at least four hundred years. The following are a small sample of how Gaelic has been marginalised for a long period.

In 1616, James VI (of Scotland) and I (of England) enacted a law to ensure that:

“the vulgar Inglishe tounge be universallie plantit, and the Irische language [Gaelic],² whilk is one of the cheif and principall causes of the continewance of barbarite and incivilitie amongis the inhabitantis of the Ilis and Heylandis, may be abolishit and removeit”.

A 1695 Act provided funding in the Highlands to build and maintain schools “for rooting out the Irish language, and other pious uses”. The use of any language but English in Scottish courts was forbidden by an Act of 1731.

Even in the less fraught atmosphere of the late 19th century, compulsory education in Scotland, beginning in 1872, adopted a heavily assimilatory model, discriminating heavily against the use of Gaelic as a medium of instruction even in areas where the children spoke no English. Although the teaching of Gaelic as a subject was permitted from 1904, the language tended to be taught, to Gaelic-speaking children, through the medium of English. Piecemeal improvements began to make their way into the education system from the middle of the 20th century, but Scotland continues to have a low level of adult literacy in Gaelic. Gaelic-medium education was not established until 1975, with a bilingual system in a number of primary schools, followed ten years later with the establishment of Gaelic-medium units.

Appendix 2

Impact of English-speakers on Gaelic-speaking communities.

Professor McKinnon has analysed this phenomenon in statistical terms. The following paragraphs derive from his analysis.

In a community in which everyone speaks a certain language random communication with neighbours involves the use of that language all the time. There are no communities in Scotland where everyone speaks Gaelic. Where half of the community speak only English, the other half speak both English and Gaelic. Random communication within that community involves speakers of Gaelic meeting other speakers of Gaelic only one quarter of the time. In this 50/50 linguistic community, English becomes the dominant language of random social intercourse. Whether or not speakers of Gaelic will use that language every time they meet may no longer involve the instinctive use of a default community language; the less the language is used, the more its use will depend on a conscious decision. The following table shows how different levels of monoglot English-speakers can affect the use of Gaelic as a community language.

² Scottish Gaelic was universally called ‘Irish’ until 1741. In the 1760s the term ‘Gaelic’ was popularised by James McPherson, who wished to deny an Irish provenance for his Ossianic forgeries. The widespread recruitment of highlanders during the Napoleonic Wars led to the official use of ‘Gaelic’ to avoid associations with the rebellious Irish.

% Monoglots (English)	% Bilinguals (Gaelic-English)	Random Communication (% of Gaelic used)
30	70	49%
50	50	25%
75	25	6.25%
90	10	1%

Only 6,009 Gaelic speakers in Scotland now live in communities in which 70-75% of the population speak Gaelic. All of these communities are in the Western Isles. A further 11,777 speakers live in communities in which the proportion of Gaelic speakers ranges from 50-69%. If the proportion of Gaelic speakers in a community falls to 25%, random communication with other Gaelic speakers, the chance of a random conversation in Gaelic falls to just over 6%. In this case, the default language of the community, or even the Gaelic-speaking section of the community, is likely to be English, and speakers of Gaelic must make a conscious effort to maintain their social use of the language. More than half of the Gaelic speakers in Scotland live in communities where Gaelic has no significant community presence, and is well below 10%.

This table shows that the number of speakers of Gaelic within a community does not necessarily equate with its level of use. Adults who formed their speech habits at a time when the language was the dominant means of communication may continue to speak Gaelic as a default language to each other. However, the loss of visibility, status and social use of Gaelic within a community could have a profound impact on children. Although they may use Gaelic within the family circle, children are likely to become habituated to using English as their default language with their peers, with consequent disastrous consequences for the use of the language in the next generation.

Comann nam Pàrant Dhun-Èideann & Lodainn

1. Do you agree that the BBC Trust is right that more focus is required on the educational aspects of the proposed service and also on how it will achieve a wider appeal in Scotland?

No.

I agree that the BBC Trust should aim to ensure that the service achieves a growing audience. However I feel that focussing on general “educational aspects” is likely to be harmful to the eventual form of Gaelic broadcasting in Scotland.

This has already received media attention as suggesting that ring-fenced provision for learners should be included in the BBC’s proposal. While learners’ interests are important, I feel that this entirely misses the point of any increased provision.

Similarly, I would worry that making the service more generally appealing at the expense of serving the Gaelic-speaking community is very dangerous. That is not to say that the service should not plan for a growing audience, which may include viewers who may not now consider themselves Gaelic speakers.

I believe the aim of wider appeal is best served through means that do not impact on the programming that the channel will carry.

I believe that means set up by our government to reverse the decline of Gaelic are already being put in place, and these will ensure a growing audience for the new service if anything can. These are educational measures, through the schools and communities, and other measures that aim to get young people, families and adult learners using Gaelic. I do not propose to describe these in detail. However, much more information is available through Bòrd na Gàidhlig’s web site www.bord-na-gaidhlig.org.uk.

The digital service may well wish to assist in this, and I believe there are certain aspects of this that should be emphasised more than they are, such as ensuring that there is sufficient educational (in the sense of learning about life) programming for young people – particularly teenagers and young adults, who are particularly poorly provided for at present.

However the key role of the new service must be simply to provide normal programmes for a broad spectrum of Gaelic speakers. This must not be compromised, given the limited resource available, by aiming to go it alone in attracting more people to the world of Gaelic.

Your report states that there is no evidence that Gaelic is facing terminal decline.

I am compelled to say that this is preposterous, and can only indicate that no evidence was sought.

I would also suggest that this stance has been utilised to avoid looking at the bigger picture of how Gaelic revival can possibly be effected, which impacts on the role that the new service must provide in the context of other agencies' plans.

Anybody with any knowledge of the Gaelic world knows how close Gaelic is to complete demise. It is not just the numbers – ask any Gael in the islands how much the young people use their language and they'll tell you - not a lot.

The reason for this is simple. For centuries, Gaelic has survived opposition and the encroachment of English through relative isolation. In recent years, it is the intrusion of the media, particularly television, which has, at the current date, all but administered the coup de grace.

The fact is that for any of the 1% or so of Gaelic speakers in Scotland, there is far, far less than 1% of 1% of programming, or any other functional access to Gaelic in their lives. That is why the digital service is so vital – to put back something Gaelic into the lives of the Gaels. In the modern world, there is only so much that friendly chat at home can achieve in keeping a language alive.

The only way that Gaelic can continue to exist as a living language is if it has real means of expression and relevance to real speakers through modern media such as television.

As parents of Gaelic-speaking children growing up in an increasingly English world, we feel this particularly acutely. We need normal programmes that our children will want to watch where Gaelic is the language used. We don't have much of that at present.

The national plans for establishing growth in Gaelic hinge upon the number of young people acquiring fluent Gaelic through their school years increasing more than ten-fold in the next 15 years. This is an achievable target, but only if all agencies, including the BBC, play their part in establishing Gaelic as something normal that more families will want to be part of. The vital role of the BBC and other broadcasting partners is to provide normal programming in Gaelic.

If the BBC Trust, and the BBC, really want to do something useful in placing constraints on the programming carried by the new channel, then the real way to add value, and to ensure a rapidly growing audience, is to make sure our young people tune in by providing a guaranteed high proportion of high-quality programmes aimed at them. And, it might be worth adding that there is nothing to say that such programmes need cater only to young people.

Finally, I believe it is necessary to consider timescales realistically. National plans aim to turn around the decline of Gaelic, with targets for stability in 15 years, and an increased number of speakers in 25. It takes time to turn around centuries of opposition and decline. This is the type of timeframe the BBC and the Trust should be considering.

2. Do you agree with the BBC Trust's decision that if the additional evidence requested is forthcoming and satisfactory, the Trust can approve the new BBC Gaelic

Digital Service, subject to conditions outlined in the Trust's report of its provisional conclusions?

I believe, in the public interest, the BBC Trust must accept the proposals regardless, but that the service may benefit from the improvements suggested above.

3. Do you agree with the statement that if the additional evidence requested is not forthcoming then it is unlikely that the service will create sufficient public value for approval?

I believe, in the public interest, the BBC Trust must accept the proposals regardless, but that the service may benefit from the improvements suggested above.

4. As an individual, do you believe that a service with the conditions suggested by the Trust would appeal to you either as (a) a Gaelic speaker, (b) a learner of Gaelic or (c) someone with a wider interest in Gaelic or Scottish culture?

As an individual who fits all of the above categories, I feel that such a service would be highly appealing.

5. Do you believe that the additional incremental spend by the BBC each year of £2.5 million plus distribution costs would create sufficient additional public value to justify this investment?

I believe it is an absolute bargain.

It is hard to put a numerical value on the living Gaelic language, but looking at how Ireland has successfully marketed its linguistic heritage and culture, for example, I would suggest that there is a potential benefit to the nation of many billions of pounds per year. This is all but beyond our reach, but the new digital channel could be a lifeline to the nation's greatly expanded marketable cultural future.

A dead language won't be worth that much to the nation.

6. If you are a potential user of the service, what means of access (satellite, cable, Freeview, broadband) would be the most convenient to you?

Freeview.

7. Do you believe the withdrawal of the Gaelic zones on BBC Two is an appropriate measure if a Gaelic DTT (Freeview) channel is established?

Not entirely. I believe some zones should be retained as 'gateways' to the Gaelic service to maximise its appeal to a wider audience.

Comhairle nan Eilean Siar

(Q.1) Do you agree that the BBC Trust is right that more focus is required on the educational aspects of the proposed service and also on how it will achieve a wider appeal in Scotland?

(A.1) (a) The future wellbeing of the Gaelic language is partly dependent on the expansion of Gaelic Medium Education. Independent research has shown that Gaelic Television is the single most significant aspect in positively influencing parent's choice of Gaelic Medium Education for their children. This inextricable link between Gaelic Television and Gaelic Medium Education must be strengthened with the delivery of high quality Gaelic Television programmes. This should be a key target for all those with an input from the Gaelic broadcasting sector.

(b) Equality of opportunity

Gaelic as a teaching medium and as a subject in its own right will be discriminated against, It is accepted that one Gaelic channel will never provide the extensive access that is available to English medium pupils, but the BBC input to the digital service would go some distance towards narrowing the gap. This is also true in respect of second language learning — learners of all the modern European languages are now able to access a range of programmes in the language being studied.

(c) Flexibility

Availability of Gaelic BBC programmes digitally would provide important flexibility, as viewing would not depend on transmission time or recording for later use. This would allow programme inputs to be slotted in at the most appropriate times.

(d) Suitability and Quality

Gaelic education has benefited considerably from the suitability and quality of BBC programmes, whether designated as education programmes or as general output. There have been programmes that fit into a wide range of curricular areas, and which cover the whole 3-18 age range. The quality of these programmes is impressive, and continuation of this standard into a digital service is highly desirable in order to contribute to the diversity of resources available for Gaelic education.

Programmes can be educational in the widest sense, and besides their importance for statutory education, are of application in terms of lifelong learning. The use of sub-titles assists learners to access programmes of a higher language register than would normally be the case, and contributes significantly to their language acquisition.

(e) A Curriculum for Excellence

The experience of Gaelic and Gaelic medium pupils in the context of the developing Curriculum for Excellence will be impoverished if they are not able to access BBC Gaelic programmes digitally. These programmes provide inputs of quality for Gaelic and cross-curricular work, whose loss would be of considerable detriment.

ACfE aims to develop 4 capacities in learners:

Successful learners
Confident individuals
Responsible citizens
Effective contributors.

Access to high quality broadcast material can contribute to developing the first three of these, and indeed to provide variety can be argued to be an essential requirement. The BBC has an unmatched record in developing confident individuals and effective contributors among the Gaelic pupils of Scotland both in terms of radio and television opportunities.

A very high percentage of Gaelic-speaking pupils have achieved beyond what would have been available in classrooms by having had the opportunity to participate in programmes. It will be a matter of considerable regret if such opportunities are no longer available.

(Q.2) Do you agree with the BBC Trust's decision that if the additional evidence requested is forthcoming and satisfactory, the Trust can approve the new BBC Gaelic Digital Service, subject to conditions outlined in the Trust's report of its provisional conclusions?

(A.2) It is the view of the Comhairle that sufficient evidence is already available to proceed with the GDS.

(Q.3) Do you agree with the statement that if the additional evidence requested is not forthcoming then it is unlikely that the service will create sufficient public value for approval?

(A.3) The case for a GDS has been made over many years by the Gaelic community and all those who see a Gaelic Digital Service as an integral part of the campaign to revitalize the Gaelic language. Alasdair Milne, former Director General of the BBC, and Chairman of the Task Force on Gaelic Broadcasting of 2000 said — “It is desirable and in the national interest, on the grounds of social justice and cultural diversity, that the Gaelic speaking audience should be served by a broadcasting system appropriate to the 21st century”

(Q.4) As an individual, do you believe that a service with the conditions suggested by the Trust would appeal to you either as (a) a Gaelic speaker, (b) a learner of Gaelic or (c) someone with a wider interest in Gaelic or Scottish culture?

(A.4) The BBC Trust must show more commitment and support for the language rather than setting up more additional obstacles for Gaelic broadcasters to jump through.

(Q.5) Do you believe that the additional incremental spend by the BBC each year of £2.5 million plus distribution costs would create sufficient additional public value to justify this investment?

(A.5) The additional incremental spend by the BBC each year of £2.5 million plus distribution costs would create sufficient additional public value to justify this investment.

(Q.6) If you are a potential user of the service, what means of access (satellite, cable, Freeview, broadband) would be the most convenient to you?

(A.6) Satellite and broadband would be most convenient in the area served by Comhairle nan Eilean Siar, i.e. Western Isles.

(Q.7) Do you believe the withdrawal of the Gaelic zones on BBC Two is an appropriate measure if a Gaelic DTT (Freeview) Channel is established?

(A.7) Withdrawal of Gaelic zones on BBC should not be an option till the Gaelic community in Scotland, as a whole, has access to a high quality, adequately funded Gaelic Digital Service.

(Q.8) We would be particularly interested in responses from potential educational partners and others involved in the promotion of Gaelic about your views on the possibilities to work in partnership with the GDS.

(A.8) The Education Department of Comhairle nan Eilean Siar and Sgioba na Gaidhlig, the Gaelic team who are responsible for promoting and developing Gaelic within the Council, would be very keen to work in partnership with GDS.

(Q.9) We would be particularly interested in views from industry respondents about the process for commissioning and the targets proposed by the Trust?

(A.9) Comhairle nan Eilean Siar would support Ofcom in setting down conditions for commissioning programmes.

(Q.10) Do the conditions proposed in the draft BBC service licence seem appropriate?

(A.10) The conditions seem appropriate.

(Q. 11) Are there any other issues you would like the BBC Trust to consider in relation to the proposal?

(A.11) Comhairle nan Eilean Siar and other Gaelic organisations have lobbied successive Governments to provide adequate funding for a dedicated Gaelic Digital Service as broadcasting has a pivotal role to play in sustaining and revitalizing Gaelic. Gaelic broadcasting also has a vital role to play in raising the profile of the language and complementing initiatives to secure its future in the field of education, the arts, and social and economic development. This is a crucial time for Gaelic and it is absolutely vital that the Gaelic Digital Service is established at the earliest possible opportunity.

CONCLUSION

The recommendations of the BBC Trust to seek further evidence on the benefits of the GDS on educational grounds and on the grounds of providing wider value to the wider viewing audience in Scotland is extremely disappointing in light of previous BBC

commitments to the GDS. Broadcaster, politicians, educationalists, educational institutions, Gaelic organisations and the Gaelic community in general have cogently argued the case for a Gaelic Digital Channel for many years.

Comunn na Gaidhlig

1. Comunn na Gaidhlig believes that education has a huge part to play in the future development of the Gaelic language. It also believes that Gaelic education has benefited from the high quality BBC educational programmes currently available in schools. The new Service will greatly improve the range of service available in and out-with schools as it will enable education programmes to be made available at times that are suitable to everyone. This new flexibility will be of great help to those who are not indigenous Gaelic speakers. We also believe that the new Service is essential to boost the language, which is being taken up by increasing numbers of children and adults outside its traditional heartlands.

Independent research has shown that Gaelic television is one of the most significant elements in positively influencing parents choice of Gaelic Medium Education for their children. The new Service will enable this link to be strengthened by making high quality programmes available at times that are suitable for the audience and will enable non-Gaelic speaking parents to access programmes that assist with home-work.

2. It is Comunn na Gaidhlig's view that the case for a new Gaelic Digital Service has already been made and that the additional evidence now being sought should re-affirm this. The new Gaelic Service is important throughout Scotland in language development, cultural and economic terms and it is vital that it is established as soon as possible. It is also incumbent on this generation to protect and advance the Gaelic language as it is one of the most precious parts of our heritage and the proposed new Service will greatly assist with this goal. Therefore, we fully agree that the BBC Trust should approve the new BBC Gaelic Digital Service.

3. As previously stated in response to Q 2, Comunn na Gaidhlig are of the view that the case for a new Gaelic Digital Service has already been made. There is sufficient evidence over many years that audience numbers for Gaelic television programmes far exceed the number of Gaelic speakers and with optional English sub-titling of programmes now possible, the programmes will attract an increasing number of viewers from areas far beyond traditional Gaelic speaking communities. In our opinion this makes the service viable and represents good value for the whole of Scotland not just the Gaelic speaking diaspora.

4. Gaelic programmes have always been of a very high quality and have appealed to non-Gaelic speakers as well as Gaelic speakers. With the advent of the new Service which will include News, Sport and Music programmes as well as programmes dealing with Scottish/Highland issues, viewer numbers will increase across Scotland. Examples of high quality programmes that attract large numbers of non-Gaelic speaking viewers include, Eorpa, Tir is Teanga and Rapal TV. Advances in technology will allow on-line support in the form of downloadable materials, website interaction, mobile phone link-ups and other which will allow Gaelic learners to participate and watch programmes with increasing confidence and understanding.

5. The proposed new BBC/GMS Service will enable the independent production sector to continue to develop, creating many employment opportunities, both in-front of, and behind camera, and CnaG urges that, where possible, those jobs are located in areas where the

Gaelic language is still used as a community language. This will generate economic benefits for those communities and is considered by us as representing additional public value.

6. It is vital that the new Gaelic Service is available across all platforms, Satellite, Freeview, Broadband and Cable. It is accepted that there is currently little or no capacity available on Freeview for the new Service but it is vital that the Service is made available on Freeview, when additional capacity becomes available, immediately following switchover. The use of other new media platforms, e.g. Mobile phones, iPod, MP3 Players should also be explored and developed as delivery mechanisms for the new Service.

7. It is important that the BBC Gaelic Zone is not withdrawn until switchover has taken place throughout Scotland. There are many viewers throughout Scotland who will continue with the analogue service whilst it is available. There is an argument, to which Comunn na Gaidhlig subscribes, that the BBC Gaelic Zone should be maintained, even after digital switchover has taken place. This would provide a platform which would help raise the profile of the Gaelic language amongst the audiences throughout Scotland and would help in attracting new audiences to the new Gaelic Service.

8. Comunn na Gaidhlig, which is the main co-ordinating Gaelic Development Agency working in the areas of Community; Business; Youth and Students and Families in most areas of Scotland would welcome the opportunity to work in partnership with the GDS.

We see opportunities of developing new and exciting initiatives, utilising new technologies to bring education to everyone who wishes it at times that are convenient to them. We see ways of helping non-Gaelic speaking parents to assist their children develop their education, we believe that by using digital technology and websites that Gaelic becomes available to the whole world and that there are opportunities of linking into educational establishments globally.

10. The conditions appear to be appropriate.

11. Comunn na Gaidhlig believes that Gaelic broadcasting has a vital role to play in sustaining the Gaelic language, raising its profile and complementing initiatives to secure its future in the fields of education, the arts, social and economic development. Gaelic broadcasting also has a crucial role to play in encouraging language acquisition and usage and indeed in establishing identity and language status. Comunn na Gaidhlig urges the Trust to approve the proposals for the creation of a new Gaelic Digital Service to enable the United Kingdom Government to fulfil its commitment, “to encourage and/or facilitate the creation of a Gaelic Television channel.” when they ratified the European Charter for Regional or Minority Languages (Article 11 1(a) (ii)).

Eyeline Media

1. We believe that Gaelic television and radio has always had a high education content, and that the proposed service will continue to deliver programming with educational content. We agree that programming aimed at learners would augment the service, but this should not dominate the schedules. As content providers we are aware that the programming must have wide appeal; we believe our programmes will be enjoyed by non Gaelic speakers because the content is of interest to them.

2. Yes

3. No, we think it is a matter of interpretation.

4. Yes, as a learner I believe the service will appeal to me. However we believe the service should appeal to speakers, learners, those with a wider interest in Gaelic and Scottish culture and indeed anyone interested in the programming content, whether they have an interest in Gaelic or otherwise.

5. It is our understanding that much of this funding comes through GMS and would not be available to spend elsewhere. Dedicated BBC licence fee funding should be distributed appropriately, and that should include a provision for Gaelic programming.

6. Satellite. We believe that Freeview is the best option, allowing free access to the majority.

7. We believe that it makes economic sense for the funding currently spent on BBC 2 programming to be put to the new service. Although a Gaelic presence on terrestrial television would be the ideal, the funds would be better spent in making the new service of the highest quality possible.

8. Here at Eyeline Media we produce Gaelic programming and we create educational material for a variety of media outlets, including online and in the classroom. We actively encourage partnership with other organisations and are currently discussing possibilities with Deiseal Earranta and Cli on the new `Ulpan course, we are also working with CIE on education programming in English, and looking at opportunities in Gaelic. We are discussing these opportunities with LT Scotland and Glow. We have developed an online drama for teenagers in Gaelic with a strong educational remit, and we are in the early stages of creating an educational exchange with Botswana, creating appropriate material with Leirsinn.

9. We agree with the Trust that the process should be open and transparent. We believe there should be a distinct separation between BBC inhouse and independent commissioning. We think the process for independents should be clear cut and answerable to one commissioning body. We think that the Trust's suggestion of 25% of content in year one is an under estimate. We believe the independent sector is capable of generating a minimum of 50% of programming in the first year, and support PACT's view that this should rise to 90% of GMS funding by year 2. As an independent company we have been creating Gaelic programming since 2004, and we have 'geared up' accordingly to be in a position to provide content for the new channel. During 2007 we have employed 15 Gaelic speakers, we have

recently renewed contracts with Gaelic speaking personnel and we have advertised for further Gaelic speaking production staff. We have engaged in training Gaelic speakers for the last 4 years. In a technical capacity we have invested in a further edit suite specifically for Gaelic programming. We are ready and equipped to create high quality programming for the new service, and we refute the comments made by BBC in their proposal that there is not sufficient capacity in the independent sector. We know that other companies have been gearing up likewise. The new service will promote growth, creating jobs and opportunities. We are based on the North East Coast so contradicting the fallacy that all the spend is in Glasgow and the Highlands and Islands. We urge the Trust to consider the issue of quotas very seriously, the relative spend on regional programming has been reduced considerably over the last 5 years and small companies such as ourselves view the service as an important source of revenue. We would also like to raise the issue of online services - we would like clarification regarding this area - as programme makers we also wish to create the online support material for our programmes, we have the ability to do this, and yet it is still a 'grey area' , with our understanding that BBC wishes all online services to be 'in house'. This is neither practical nor competitive, and we ask the Trust to look into this issue. The same principles apply to current affairs programming, or indeed any specific area that BBC wishes to 'ring fence'. The one exception is news which we acknowledge the BBC already has a service in place; however we believe that additional opportunities within news should be open to freelancers and stringers, and perhaps the Trust can look at this also. Lastly the issue of rights ownership, the Trust should ensure that the service negotiates appropriate terms of trade including rights ownership with professional representative bodies including PACT.

11. Gaelic is precious. Too few Scots have access to Gaelic, the GDS will make it accessible to a wide audience, increasing its' footprint and giving everyone in Scotland the opportunity to enjoy and hopefully participate in an important part of our culture.

BBC Gaelic Advisory Committee

1. Do you agree that the BBC Trust is right that more focus is required on the educational aspects of the proposed service and also on how it will achieve a wider appeal in Scotland?

The Committee are firmly of the view that the educational aspects of the proposed GDS are vital to the success of its aims to reach a wider audience and to attract new Gaelic speakers. Anecdotal evidence shows that Eorpa, for example has consistently reached a wide audience and has attracted the interest of non-Gaelic viewers because of its very distinctive approach to current affairs and excellence of production. The most constant daily outreach for Gaelic on TV over the past 20 years has been the provision of pre-school children's programmes. These are often watched by children with no Gaelic. The provision of a GDS would increase the actual reach of these programmes considerably.

While the Committee agrees that it is also appropriate for the Trust to highlight that more focus is required on how the GDS will achieve a wider appeal in Scotland, nevertheless the Committee would wish to point out that the existing proposal for limiting the platform availability at launch, by delaying DTT distribution till 2010 at the earliest, will restrict the reach of the service and reduce the potential audience at least until that time. Given that the Trust have highlighted how the educational strategy will be delivered as the key to the public value of the service, the Committee is keen to stress the need for maximum platform distribution at launch. In any case, the idea that the GDS should be able to attract a set number of new Gaelic speakers does not seem justifiable and assessment of the public value of the service should not involve such an expectation.

The Committee is convinced that the capability to produce high-quality Gaelic educational programmes, which would appeal to a wider audience than is currently available, exists in the BBC. Examples of this are Eorpa, Tir is Teanga, which stimulates interest in the language because of its visual appeal, and a wide variety of children's programmes. The interest in these programmes is already remarkable given the how little air time is allocated to Gaelic programmes at present and this would undoubtedly increase if they were available within a wider coverage via the GDS.

In discussing the withdrawal of the *Jam* materials, the Committee thought that the release of these would significantly increase the potential educational benefits of the GDS.

2. Do you agree with the BBC Trust's decision that if the additional evidence requested is forthcoming and satisfactory, the Trust can approve the new BBC Gaelic Digital Service, subject to conditions outlined in the Trust's report of its provisional conclusions?

The Committee agree, but please refer to the Committee's comments on delaying launch on DDT till 2010.

4. As an individual, do you believe that a service with the conditions suggested by the Trust would appeal to you either as (a) a Gaelic speaker, (b) a learner of Gaelic or (c) someone with a wider interest in Gaelic or Scottish culture?

The Committee believes that the GDS will build upon the already existing audience participation in Gaelic services and greatly widen it. There is evidence that a GDS would appeal to some 70% of the population in Scotland, either as Gaelic speakers already or as non-Gaelic speakers interested in learning the language or in Gaelic culture. This is particularly the case in regard to the music scene in Scotland, within which Gaelic music in all its rich diversity has gained a rapidly increasing place, through such festivals as Celtic Connections. This would undoubtedly be one of the most successful avenues for a GDS to use in reaching a wider audience, especially when linked with similar events in other Celtic nations, all of which adds to the potential of the GDS to reach a wider audience and attract new speakers.

5. Do you believe that the additional incremental spend by the BBC each year of £2.5 million plus distribution costs would create sufficient additional public value to justify this investment?

It is very difficult, if not impossible, to quantify in monetary terms how much a language and its related culture are worth, as also what level of priority should be given to its support financially as compared with other services. The Committee believes that this annual incremental investment of £2.5 million is fully justifiable in relation to public value.

Also it must also be borne in mind that the BBC will bring many more assets to the provision of a GDS in addition to the financial commitment of this incremental spend, a factor which will be considerably lessened should an Ofcom licensed service be established.

The Committee would wish to request that the provision of £2.5 million be confirmed by the BBC irrespective of whether the GDS is a BBC licensed service or not.

6. If you are a potential user of the service, what means of access (satellite, cable, Freeview, broadband) would be the most convenient to you?

See the comments in response to Question 1 above regarding the proposed delay in launching the GDS on DTT till 2010.

The Committee was also convinced that over the next decade “on demand” viewing and listening will take over from linear viewing. However, the Committee also took the view that the place of communal and family viewing would retain some importance. It is therefore significant that the proposals are for a Gaelic Digital Service rather than a channel.

7. Do you believe the withdrawal of the Gaelic zones on BBC Two is an appropriate measure if a Gaelic DTT (Freeview) channel is established?

The Committee did express a measure of concern that some viewers to Gaelic programmes may be lost through the withdrawal of Gaelic zones on BBC2, in that a number of viewers may come across Gaelic programmes on BBC2 who would not necessarily turn to a dedicated Gaelic channel.

It was also thought important to maintain close links between the GDS and BBC1, BBC2 and BBC education so as to capitalise on the BBC/GMS partnership which would then enable coverage of popular events like the World Pipe Band Championships, T in the Park, sports events, the Military Tattoo, broadcasts from the Scottish Parliament, etc, all of which could

be presented with a Gaelic commentary, although the Committee appreciates that difficulties exist regarding the airing of large events which have a satellite footprint in mainland Europe.

More links should be developed between the GDS and BBC Scotland to enable the GDS to analyse where gaps in the market lay.

10. Do the conditions proposed in the draft BBC service licence seem appropriate?

Please refer to the comments relating to delaying availability by DTT.

11. Are there any other issues you would like the BBC Trust to consider in relation to the proposal?

The Committee wish to stress the value of the BBC to the service partnership. It would be detrimental to the aims and aspirations of the proposed GDS for it to proceed on a non-BBC licence. The Committee believes that the proposals provide a historic opportunity for support and outreach for the Gaelic language and culture. It is vital that the BBC Trust sees its way clear to approve the service.

Gaelic Education Trust

I would, once again, on behalf of Urras Foghiam na Gaidhlig, highlight the importance of the proposed Gaelic Digital Service to the Gaelic community.

The educational element of the BBC's input is invaluable and will further reinforce the work being done in the Gaelic-medium schools and units.

It will also be a valuable resource for those who have been through the Gaelic education system and who, as adults, might not have, or have only limited, access to the spoken language in the home or the workplace or, indeed socially.

Gaelic Media Service

BBC Trust interim conclusions

1. Gaelic Media Service (GMS) acknowledges the points raised in the BBC Trust's report of its interim conclusions published on 21 November 2007. As a partner in the Gaelic Digital Service, GMS is working closely with the BBC Executive to prepare the additional information specifically requested by the Trust.
2. GMS also notes the conditions of launch set out in section 6 of the PVT document, and is working with the BBC Executive on detailed plans for the GDS's online offering, online rights, commissioning, EPG listing and other issues highlighted by the Trust, and this information will be provided in due course.

Q1: Do you agree that the BBC Trust is right that more focus is required on the educational aspects of the proposed service and also on how it will achieve a wider appeal in Scotland?

3. GMS is content that emphasis is placed on the many educational aspects of the proposed service across all genres of programmes. GMS also agrees that the proposed service should have wide appeal in Scotland, since this accords with GMS's statutory remit in respect of "persons in Scotland".

Q2: Do you agree with the BBC Trust's decision that if the additional evidence requested is forthcoming and satisfactory, the Trust can approve the new BBC Gaelic Digital Service, subject to conditions outlined in the Trust's report of its provisional conclusions?

4. GMS believes that there is compelling evidence for a Gaelic Digital Service and is happy to work with the BBC Executive to set out this evidence.

Q3: Do you agree with the statement that if the additional evidence requested is not forthcoming then it is unlikely that the service will create sufficient public value for approval?

5. GMS does not agree with this statement. Although GMS has been pleased to work with the BBC Executive to present additional evidence to the BBC Trust, we remain of the view that evidence already exists to demonstrate how the new service will create significant public value, not least through the synergies created by the partnership of the two organisations. The combination of the resources and expertise of both parties will itself create public value by allowing for effective long-term planning and partnership initiatives guided by a shared vision.

Q4: As an individual, do you believe that a service with the conditions suggested by the Trust would appeal to you either as (a) a Gaelic speaker, (b) a learner of Gaelic or (c) someone with a wider interest in Gaelic or Scottish culture?

Not applicable

Q5: Do you believe that the additional incremental spend by the BBC each year of £2.5 million plus distribution costs would create sufficient additional public value to justify this investment?

6. Detailed budget figures are being provided to the BBC Trust in the response prepared by the BBC Executive with the co-operation of GMS. The BBC's additional incremental spend unlocks the contribution of the entire GMS budget to the GDS for programme making and training, and will allow both parties to share skills and expertise and to develop a complete tri-media service that will enhance existing Gaelic broadcasting provision and create far greater value than could otherwise be achieved for the same investment.

Q6: If you are a potential user of the service, what means of access (satellite, cable, Freeview, broadband) would be the most convenient to you?

Reach, impact and enabling digital Britain

7. GMS's statutory remit is to ensure that a wide and diverse range of high quality programmes in Gaelic are made available to persons in Scotland. Given this wide public service remit, GMS believes that any service that broadcasts GMS-funded content must be capable of reaching all persons in Scotland and should be available on all digital platforms to ensure the widest possible reach.
8. Digital Switchover begins in Scotland in 2008. The Gaelic Digital Service will be the first new Scottish television channel to be available exclusively on digital platforms, giving those who want to see the new service an incentive to switch to digital television as soon as possible. Making the Gaelic Digital Service available on all digital platforms, including Freeview, from the earliest opportunity will play a part in enabling digital Britain.

Dedicated DTT spectrum for Gaelic broadcasting

9. Ofcom has recognised the need for spectrum to be allocated for indigenous language broadcasting in the nations and regions of the UK. Paragraph 1.39 of Ofcom's consultation on *The Future of Digital Terrestrial Television* (published 21 November 2007) recommends that the Gaelic Digital Service should be available in Scotland on a PSB multiplex, and paragraph 6.24 underlines the Government's commitment to ensure that the Gaelic Digital Service is carried on a universal coverage multiplex at switchover. Given these statements, and assuming that the same spectrum is allocated to Welsh (S4C) in Wales and to Irish (TG4) in Northern Ireland as recommended by Ofcom, it is entirely logical that Scotland-only spectrum must be allocated to Gaelic and re-affirmed now in order to facilitate development of audience reach and accessibility. The review on the reallocation of DTT spectrum is already underway. In the view of GMS, a clear and lasting commitment to the carriage of the GDS on a public service multiplex is required now; not in 2010 by which time

spectrum is likely to have been fully allocated within current known technological constraints.

Means of access

10. GMS believes that the principle of universal access to services of a public service nature, such as the GDS, should prevail and that a commitment in principle should be given to carriage on all platforms: satellite, cable, Freeview and broadband.

Q7: Do you believe the withdrawal of the Gaelic zones on BBC Two is an appropriate measure if a Gaelic DTT (Freeview) channel is established?

11. GMS believes that the question of withdrawing the Gaelic zones on BBC Two should not be linked to Freeview. There will always be interest in good-quality programmes in Gaelic and it is appropriate for these programmes to continue to have a place in the schedules of BBC Two and other BBC channels, including CBBC and CBeebies. The presence of Gaelic programmes throughout the family of BBC channels will allow content sharing and cross-promotion to continue after switchover and to draw new audiences to the GDS.

Q8: We would be particularly interested in responses from potential educational partners and others involved in the promotion of Gaelic about your views on the possibilities to work in partnership with the GDS.

12. GMS maintains regular contact with organisations involved in the promotion of Gaelic and seeks to develop existing partnerships and establish new ones where appropriate to benefit Gaelic broadcasting, skills development, research and language development. Fostering such partnerships will be a key element of GMS's work as a partner in the GDS.

Q9: We would be particularly interested in views from industry respondents about the process for commissioning and the targets proposed by the Trust.

Not applicable.

Q10: Do the conditions proposed in the draft BBC service licence seem appropriate?

13. GMS notes the conditions proposed in the BBC service licence.
14. As regards the first condition, that the GDS should "Broadcast live news programmes each weekday evening, including at peak time, and a longer news review at weekends", GMS is in full agreement and sees this as a minimum.
15. As regards the second condition, that the GDS should "Commission at least 25 per cent by volume of its original programming (excluding news) from independent producers", GMS points out that it has a firm commitment to the independent

production sector which currently stands at not less than 50% by value of its original programming.

Q11: Are there any other issues you would like the BBC Trust to consider in relation to the proposal?

The political and policy context

16. Political recognition of the need for language planning intervention to reverse language shift from Gaelic to English has led since devolution to the Gaelic Language (Scotland) Act 2005 and to the establishment of Bòrd na Gàidhlig, the statutory body charged with overseeing the implementation of the National Plan for Gaelic and of individual plans prepared by Scottish public bodies, and with co-ordinating language development initiatives and disbursing Government funding for Gaelic. The National Plan for Gaelic recognises the importance of broadcasting in affecting the linguistic environment of the home and in assisting with the development of positive attitudes to the acquisition and transmission of Gaelic.
17. It is in the context of the improved status Gaelic now enjoys that the Scottish and UK Governments have given their support to the establishment of the Gaelic Digital Service. The Scottish Executive (now the Scottish Government) has provided GMS with additional funding for the establishment of the GDS. In the settlement reached by Ofcom with STV in November 2005, it was agreed that STV would provide GMS with in-kind support of £1.2 million for the establishment of the GDS over the three-year period 2006-08. In March 2007, DCMS also provided a one-off contribution of £250,000.
18. The lack of a dedicated channel was highlighted by the European Council Committee of Experts in its 2004 report on implementation in member states of the Charter for Regional and Minority Languages as a shortcoming that required to be addressed if the UK was to be regarded as having fulfilled its obligations under the Charter.

GMS remit

19. As a body established in statute with the responsibility to make high-quality Gaelic programmes available to persons in Scotland³, GMS must have regard to the needs of this audience and to the impact of Gaelic broadcasting on the audience, on Scottish culture and society and on language development.
20. The Gaelic community and Gaelic development bodies have long seen a dedicated television channel as a vital element of the efforts required to reverse language shift from Gaelic to English (see also paragraph 16 above), and GMS is committed to assisting in these efforts.

³ Communications Act 2003

The case for a linear television channel

21. GMS is convinced that there is a strong need and appetite for a linear television channel, as part of the proposed tri-media service, among the current audience for Gaelic programmes and among those who will be drawn to the new digital service.
22. A Scottish omnibus survey commissioned by the BBC Executive and conducted in April 2007⁴ showed that 69% of respondents agreed that it was important for Scotland to have a dedicated Gaelic-language service and that 70% agreed that this was a service that the BBC should provide. These figures reveal a significant level of support for the Gaelic Digital Service not only among current viewers of Gaelic programmes but among the Scottish population as a whole.
23. In a Scottish omnibus survey commissioned by GMS and conducted in October 2007, half of all respondents who expressed an opinion said that they would tune to the new Gaelic Digital Service if made aware of it. A boost sample of 200 Gaelic speakers was also surveyed as part of this research exercise, and 84% of this sample said that they would tune in to the new service.
24. GMS is fully committed to the proposal for a service which combines television, online and radio in its editorial vision. We believe that a linear television channel will be a vital element of the service if certain key sectors of the target audience, such as families, are to be encouraged to consume its content. Given GMS's remit to make a wide range of high-quality Gaelic programmes available to persons in Scotland, we must bear in mind the needs and preferences of the whole audience and not just the segment of the audience that are able to access an online-only service.
25. While GMS recognises that online accounts for an increasingly large element of the media consumption of many audience sectors, we see as a priority family viewing of a channel that will place a good deal of emphasis on programmes for pre-school and school-age children and young people. These audiences are a critical demographic sector for language development.
26. A linear television channel is seen as highly important for indigenous language communities. The closest examples geographically are S4C in Wales and TG4 in Ireland, and there are other examples throughout Europe. The presence of a language in the world of linear television creates numerous benefits, not the least of which are the normalisation and validation of the language through its use in news broadcasting and throughout the whole range of genres. The presence of media role models on the same platforms as celebrities on English-language channels sets the language in a positive context, refreshing the audience's attitudes and providing a regular first point of contact for information through the medium of the language.

⁴ Referred to in the PVA para 5.2.12

Scottish Broadcasting Commission

27. The Scottish Broadcasting Commission has been established in response to the current challenges in the broadcasting sector in Scotland. The Gaelic Digital Service has the potential to play a significant part in meeting many of those challenges.

Targets for GDS reach

28. GMS notes the proposed performance measurement framework set out in Service Licence Annex I, and in particular the target for the GDS to contribute towards the maintenance of combined BBC weekly reach at over 90 per cent by aiming to increase its own weekly reach to around 250,000 people each week. We agree that this is a reasonable target to aim for over time, once the GDS is available on all digital platforms. Until such time as carriage on all platforms is achieved, the reach targets should be phased in.

Conclusions

29. GMS wishes to thank the BBC Executive for the commitment that it is showing to the establishment of the Gaelic Digital Service, and hopes that the BBC Trust will agree that there is sufficient evidence to conclude that the public value test has been satisfied.

Appendix I: GMS remit and background to the GDS proposal

GMS remit

- a. Seirbheis nam Meadhanan Gàidhlig (Gaelic Media Service or GMS) is a publicly funded body established by statute and regulated by Ofcom. Its remit⁵ is to secure that a wide and diverse range of high-quality television programmes in Gaelic are broadcast so as to be available to persons in Scotland, and it may apply the Gaelic television fund to commission Gaelic language programmes for television, radio, on-line or new media and to engage in the provision of training, development and audience research.
- b. GMS was established by the Broadcasting Act 1990 (and was formerly known as the Gaelic Television Committee and as the Gaelic Broadcasting Committee) to administer the Gaelic Television Fund, and it has since then been a significant source of funding for Gaelic television programmes broadcast on the BBC, on channel 3 in Scotland.

Background to the current proposal for the Gaelic Digital Service: key dates

- c. In June 2005, Neil Fraser, Chairman of GMS, met with BBC Chair, Michael Grade, and BBC National Governor for Scotland, Jeremy Peat, to discuss a proposal to establish a new channel in partnership, and as a result of these initial discussions a joint working group chaired by Professor Sir Neil MacCormick was set up in August 2005.
- d. The working group of the BBC and Seirbheis nam Meadhanan Gàidhlig published a position statement on 26 May 2006. The position statement set out agreed principles and key issues for resolution between the two parties.

⁵ Communications Act 2003

- e. Between May 2006 and August 2007 discussions between GMS and the BBC continued. A collaboration agreement setting out the framework for the joint management and governance of a BBC-licensed service was signed in August 2007.
- f. Since August 2007, GMS and the BBC Executive have continued to work closely on preparations for the Gaelic Digital Service.

Gaelic Society of Inverness

1) Do you agree that the BBC Trust is right that more focus is required on the educational aspects of the proposed service and also on how it will achieve a wider appeal in Scotland?

The Gaelic Society of Inverness (GSI) is committed to working to maintain the strength and quality of the Gaelic language and culture. In pursuing these objectives the GSI actively supports all areas of Gaelic and Gaelic Medium education, as well as promoting the status of the language and national awareness of it.

GSI believes that the aspirations of the National Plan for Gaelic are totally aligned with these principles, and the successful delivery of the Plan will require an effective Gaelic Digital Service (GDS).

The GDS cannot, of course, be all things to all people, but in so far as the development of Gaelic is concerned at this moment in time, its potential impact for the status, awareness and support of the language cannot be over-stated. From a national Scottish perspective the greater access to Gaelic through the GDS will enrich viewer options and experience.

2) Do you agree with the BBC Trust's decision that if the additional evidence requested is forthcoming and satisfactory, the Trust can approve the new BBC Gaelic Digital Service, subject to conditions outlined in the Trust's report of its provisional conclusions?

The GSI believes that the argument for a dedicated Gaelic language broadcasting service has been made and won many times. What is proposed in the GDS has been long awaited, and the inclusion of the service in the National Plan underlines its importance to the language planning process which Scottish Government has now committed to through legislation. GSI very much hopes that the BBC Trust will find the additional information generated by this further consultation sufficient to enable it to approve the GDS proposal unconditionally.

3) Do you agree with the statement that if the additional evidence requested is not forthcoming then it is unlikely that the service will create sufficient public value for approval?

As taxpaying individuals the membership of GSI are very aware of the importance of securing best value from all public investment. However, GSI also believes that the relative weakness of the Gaelic language and culture at this time is a direct consequence of the “political” suppression of the language in the past and the lack of any parity of support, respect or treatment of it and its users.

The support which the BBC gave to Gaelic through its programme output over the years has been hugely important to the maintenance of the language, and the GSI believes that it is totally appropriate that the BBC should be a partner in the proposed GDS at this time. The BBC will bring the value of its experience to production, but equally importantly its publicly funded technical resources will be utilised thus avoiding duplication of such investment by an alternative structure for a new GDS. The GSI is totally confident that the creation of this new GDS, and particularly within a BBC partnership agreement, will attract significant new audiences and generate growing interest in Gaelic language and culture.

Gaelic may be statistically weak in Scotland at present but its culture is an enormously powerful marketing label for the country. GSI believes that the combination of the Gaelic and BBC “brands” will make an extremely effective partnership.

4) As an individual, do you believe that a service with the conditions suggested by the Trust would appeal to you either as (a) a Gaelic speaker, (b) a learner of Gaelic or (c) someone with a wider interest in Gaelic or Scottish culture?

GSI is already aware of a growing interest in the learning of Gaelic. There is also strong evidence that the commencement of the Gaelic Language Act and the start of the implementation of the National Plan are increasing awareness and general interest in Gaelic. The GDS will be essential in servicing this growing interest and in assisting with the delivery of government targets for the language.

5) Do you believe that the additional incremental spend by the BBC each year of £2.5 million plus distribution costs would create sufficient additional public value to justify this investment?

As already stated GSI is very aware for the need to constantly monitor and deliver public value. GSI believes that Gaelic is a priceless part of Scotland’s national heritage, and that the potential benefits to the whole of the UK from its growth and promotion will vastly outweigh the cost of the investment currently being proposed to the BBC Trust.

The GSI believes that the GDS will enhance the BBC’s transmission portfolio, thus adding extra value to the public investment in the BBC itself. GSI is also confident that the content and the perspective of the output by the GDS will prove attractive to a growing audience. GSI strongly promotes the “sharing” of Gaelic and its culture and it enthusiastically supports the provision of optional sub-titling on the GDS.

6) If you are a potential user of the service, what means of access (satellite, cable, Freeview, broadband) would be the most convenient to you?

Like any new service or initiative, GDS must be given every opportunity to thrive. This means that it must be enabled to reach **all** those who might be attracted to use it.

GSI is firmly of the view that GDS should be available on Satellite, Broadband, Cable, and on Freeview immediately space is available after switchover.

Stressing the importance of enabling the GDS to grow and reach its maximum audience GSI also believes that all other appropriate media distribution platforms should be utilised.

7) Do you believe the withdrawal of the Gaelic zones on BBC Two is an appropriate measure if a Gaelic DTT (Freeview) Channel is established?

It is difficult for English language media consumers to appreciate the utter frustration of a viewing community whose extremely modest and generally irregular output is scattered over different channels at varying time slots. The BBC 2 block has been a life-line for many viewers over a long period, although it has to be said that the timing of the block means that many economically active viewers are unable to view.

The creation of GDS has the potential to immediately create a regular daily access point for viewers. Even those who cannot be present to view will be better able, and more likely, to

record for future access. The benefit for Gaelic users, learners, and all those interested in it is immeasurable.

GSI understands that research has shown that most viewers will access television by Freeview after switchover. Given the status of the current BBC 2 block, and the critical importance of retaining all existing viewers as we move to a new provision, GSI would strongly argue for the retention of the current BBC 2 output until switchover has been implemented across Scotland.

8) We would be particularly interested in responses from potential educational partners and others involved in the promotion of Gaelic about your views on the possibilities to work in partnership with the GDS.

Over the past few years GSI has developed a very successful programme of annual educational cultural events. The BBC has increasingly recognised the quality of these events and has become a regular partner, recording the occasions for later transmission. GSI would look forward enthusiastically to expanding partnerships with the new GDS, to inform, educate and entertain growing audiences.

9) We would be particularly interested in views from industry respondents about the process for commissioning and the targets proposed by the Trust?

GSI cannot contribute on this topic.

10) Do the conditions proposed in the draft BBC service licence seem appropriate?

GSI feels the conditions to be acceptable.

11) Are there any other issues you would like the BBC Trust to consider in relation to the proposal?

GSI is aware that research carried out by MRUK in 2003 for the BBC and Bòrd na Gàidhlig demonstrated that a substantial number of Scots are aware of Gaelic and have some interest in it.

As will have been apparent from previous remarks the GSI recognises the BBC as a publicly funded body which has given enormously important support to Gaelic over many years, but which quite correctly wishes to deliver best value from the application of its resources. GSI believes that the partnership proposed between GMS and the BBC to deliver a GDS is the right and proper way forward at this time.

GSI recognises that the Gaelic users are statistically weak at this time, but it would also wish to stress the very clear evidence regularly demonstrated by the reach of programmes such as *Eorpa*, *Tir is Teanga*, and *Rapal*, of the substantial potential audience for good quality programmes in Gaelic.

Sub-titling options provide the access and there is very clear evidence that viewers are happy to use this. GSI would also wish to re-stress the huge significance to viewers of having a regular daily block of output. If a weekly block such as BBC 2 Thursday can regularly generate audiences equal to 4 or 5 times the number of Scots with even a passive knowledge of Gaelic, GSI is convinced that a daily service will rapidly grow to a level which will sustain

and eventually surpass these figures. GSI believes this will only be achieved with the unconditional support the BBC trust to the GDS.

Hecla Consulting

I welcome the opportunity to respond to the draft conclusions of the Public Value Assessment undertaken by the BBC Trust on the proposed Gaelic Digital Service.

I have a number of specific observations and comments on the Market Impact Assessment prepared by OFCOM and on the draft Public Value Assessment prepared by the BBC Trust.

My comments are as follows:

Observations on the MIA Statement

The terms of reference are poorly constructed which lead to severe constraints on the subsequent evidence base. The BBC Trust PVA commentary refers to a lack of evidence and statistical issues associated with sample size etc yet the methodology was agreed between BBC Trust and OFCOM. Other issues in respect of the MIA include the following:

- The sources of evidence are limited.
- No impact assessments appear to have been undertaken in the conventional sense in relation to economics, language or community.
- Many assertions not backed by evidence.
- Projected economic impacts of service not discussed fully nor referenced.
- It would have been useful to cite positive benefits. Under the “Gaelic Education Service” section evidence was cited throughout the consultation exercise on negative effects yet no positive benefits have been cited in the report. This is a serious omission. Presumably an increase in the scale and scope of the Gaelic Digital Service would benefit education services and/or open up new opportunities for the delivery of the Gaelic education services to a wider audience.

The assertion at AI.44 is not correct. The present Gaelic content appeals to many non-Gaelic speakers. I know at least 10 non-Gaelic speakers who regularly view Gaelic programmes not because of language but because of the quality of the topic matter.

Critical analytical elements that should have formed the basis for a discussion on issues of relevance on public policy intervention in respect of Gaelic broadcasting are missing from the submission. Thus, the basis for the proposal is somewhat weakened and in many respects flawed.

Observations on the Public Value Assessment Statement

My comments on the BBC Trust’s PVA follow the section references. Generally, the Trust’s report is reasonably balanced and quite rightly questions the evidence base as provided by the BBC Executive. However, the approach taken to the analysis is rather pedantic in parts and could be considered as “playing to the audience” particularly when the financial expenditures that are primarily under scrutiny is the incremental £2.5M for the new channel. My comments are as follows:

2.2.2

The definition of weighting given to ‘significant’ should be set in the context of overall expenditures as much as for the overall proposal for a new channel.

2.3.3

The Gaelic channel as a primary vehicle in the revitalisation strategy for the language clearly meets the public purposes stated.

2.3.7

Agree with the weighting given to impact. Clearly specified measures of impact would be appropriate to state at the outset of the exercise. The weighting given to cost is more problematical. Whilst VFM and cost are important factors – these need to be set in the proper context. Market failure has not been discussed in either the MIA or the PVA. That is a serious omission when considering the VFM of the proposed GDS. The basis for intervention should be clearly stated at the outset. Conclusions can then be set within the market failure aspects that drive the provision of the public service.

2.3.8

Agree

3.1.8

Agree that the BBC2 Gaelic service should be withdrawn once the digital switchover has been completely successfully and a review is undertaken that audience reach targets are satisfactory. However, this does not preclude BBC2 from transmitting Gaelic programming if that is appropriate to their scheduling strategy.

3.6

Projected data could be supplied to estimate potential target audiences. Proxy data in terms of expected new speakers and learners as stated in the National Gaelic Plan could be applied to the present situation to arrive at some projected future audience. The demand for places at Gaelic medium schools and playgroups could also be used as proxy indicators in relation to demand factors and in support of the educational dimension of the proposed service. Within a five year time span this is likely to be similar to the present situation but over 10-20 years the expectation is that these data will increase substantially. It is important not to become fixated on immediate returns in terms of audience numbers – this is an investment in the revitalisation of Gaelic and such processes take time.

3.6.2

Do not agree with this assertion. Appeal to Gaelic is beyond the Gaelic speaker or the Gaelic understanding audience.

3.6.4

The data can only be illustrative.

4.3.3

The targets are important for the future audience reach of the service and reiterate the investment aspect of the proposed funding regime to Gaelic broadcasting. Looking at the 2021 targets: 4,000 pupils in first year Gaelic medium (313 pupils in 2006-07); 40,000 people with complete fluency in Gaelic (31,218 in 2001). These data could also be utilised to estimate future audience reach. These data should also be the basis for a future educational

strategy for Gaelic broadcasting. An educational strategy is important but more important at this stage is the presence of a Gaelic Channel. Without a Channel there will be no need for an educational strategy in terms of media reach and/engagement with the Gaelic community or indeed a strategy for Gaelic education per se. The revitalisation of Gaelic is dependent on the development of broadcasting/media domains to support other parallel ongoing strategies.

4.5.5

This might be the stated purpose of the BBC Executive. It would be useful to know what particular strategies are to be employed to reach these two audience categories. In my view the reality is different. Presently, both categories view the current programming without much thought to particular targeting strategies. It is also likely that there are more viewers as a proportion of the potential audience in the new speakers/learners categories than in the fluent seekers category. More research is needed in this area before BBC Trust and BBC Executive make sweeping statements on strategic targeting and delivery and before coming to unsubstantiated conclusions.

4.6.3

The BBC Trust questions the appropriateness of a new linear service. We need to be reminded that a Gaelic channel serves a dual purpose: provision of status to the language and the delivery of a media service to remote rural locations where access to broadband and new media technologies remains problematical. There is also a need to create critical mass in terms of audience and access to a linear channel is the most effective way of achieving this objective at the present time.

The development of new media technologies and the use of high speed broadband will also continue and provide the added dimension to the service through enabling on-demand access including the possibility of pay-to-view for some services. Clearly there are numerous opportunities to provide creative content across a range of platforms but the institutional stability provided by the BBC/GMS partnership reduces the overall risk for new entrants to Gaelic media and is a prerequisite requirement to develop this niche sector of UK broadcasting and media content.

5.2.6

The per capita argument, although it is legitimate, is somewhat lame in the context of Gaelic output as proposed in the BBC/GMS submission. The counter argument is set out in paragraph 5.2.7.

5.2.8

It would be informative for minority language specialists to know the BBC Trust's thinking on where the point of no return is in relation to Gaelic. This is a sweeping statement by BBC Trust. The Scottish Parliament has recognised that the language is in danger and the Gaelic Act of 2005 gives the language a degree of official recognition. If Gaelic was in a robust state of health there would be little justification in intervening in the market per se although the BBC already intervenes in the English speaking market (primarily) with a £3.5 billion public subsidy.

Economics tell us that in some cases the market does not operate as efficiently as would be desirable. Such 'market failures', the unregulated interplay of supply and demand results in an appropriate level of production of some commodity, where inappropriate can mean 'too little' or too much'. Therefore, if we accept that linguistic diversity is good, and market failure occurs in the production of language, then state intervention is justified in terms of economic theory and more especially in terms of its application to public policy. There are six accepted forms of market failure :

1. public goods;
2. externalities;
3. market power
4. imperfect information
5. asymmetric information;
6. increasing returns (e.g. natural monopoly)

In the case of Gaelic it can be argued that market failures emerges across more than one of the six above named categories. Manifestation of market failure can also be inter-connected: public goods are typically under supplied by market forces, because they give rise to externalities. Hence, if Gaelic as a language presents some of the characteristics of public goods, then two types of market failure arise in the case of linguistic diversity, namely those of public goods and externalities. In my view Gaelic presents the characteristics of a public good and therefore justifies intervention in the pursuit of public policy objectives to fulfil the aspirations laid out in the Gaelic Act.

5.2.13

The BBC Trust is critical of the methodology agreed with OFCOM yet both parties agreed the approach at the outset. The questionnaire and sample size should have been configured appropriately at the outset and should not now be utilised as a lever of criticism.

5.2.15

It is not clear whether the concept of 'value for money' is properly understood by a member of the public to be able to give a considered opinion. Were respondents given context options by which support for a dedicated Gaelic channel could be justified and supported? Did the respondents know anything about the state of Gaelic when responding to the question?

5.2.21

Consistent responses from a range of sources show the importance of Gaelic to Scottish heritage and culture.

5.2.23

Data suggests the potential for the new service. The present delivery context should also be taken into account when considering these data. Data as presented indicates that 33% of the people of Scotland would use the serviced in some way which equates to some £1.6 million people. This is a significant finding considering that less than 2% of the Scottish population has some knowledge of Gaelic. Such data is a strong proxy indicator for value for money and indeed to estimate future demand profiles.

5.3.4

BBC Trust makes an important contribution in partly specifying the justification rationale for the new service in this paragraph. The difficulty is the measurement of the potential impact.

5.4.3

A significant increase in reach is clearly possible if it is accepted that the BBC Trust's own research is reasonably reflective of the views of the Scottish population. If that is the case some 1.6 million people indicate that are likely to use some element of the new service.

The selective use of survey statistics that are based on varying methodologies only serve to confuse the analysis.

5.5.4

It is difficult to understand why consolidation should be an inappropriate strategy or part of a group of sub-strategies that will no doubt be utilised to develop the service with a range of different segments of the Scottish viewing public. The analysis tends to get into the realms of imagination when trying to segment the Gaelic viewing public into lapsed speakers, unconfident speakers etc.

5.5.5

The capacity to deliver exists and can be developed with an enhanced level of service. BBC Trust's comments on training are unfounded – the need for training does not necessarily imply a lack of capacity, rather it makes excellent strategic management sense to invest in the skills of the workforce to enable a quality and cutting edge service to be maintained and delivered into the future.

5.8.4 to 5.8.9

The BBC Trust seems to be fixated with the need to present counter arguments for a linear channel. It is quite odd that at 5.8.6 the view is expressed that in the long-term that a television channel might not be appropriate for the needs of Gaelic speakers. What is the basis of this assertion? Why is a television channel appropriate for English speakers? Is public broadcasting delivery now dependent on the number of viewers that can be attracted to such a service?

5.8.13

The statement is true but there is a wider issue here in terms of universal access. Not all households have broadband capability to the speed required to enable a quality service to be delivered. This is unlikely to happen for quite considerable time. As such GDS should be available via Freeview when the reorganisation of that multiplex is completed.

5.8.14

The £4M cost attributed to Freeview will only be activated in 2010. Evoking an opportunity cost argument in the context of a Gaelic channel is highly contentious and possibility discriminatory particularly when there is no alternative use proposed for the spectrum capacity that would be allocated to GDS. I'm sure a greater proportion of the Scottish population read the Daily Record rather than the Financial Times but that doesn't make the

FT of less value to its readership. The technologies that drive the digital media provide a prime opportunity to create a paradigm shift in how Gaelic programming can be accessed in the future. Creating different channels of access will undoubtedly increase the number of speakers within Scotland and in other countries. The joint BBC/GDS partnership and the value for money of the additional £2.5M to be allocated by the BBC is being underplayed in this analysis.

5.9.8

The per capita analysis is spurious. The case has been accepted that the Gaelic language requires specific support through appropriate legislation hence the Gaelic Act. As such the challenge is to find appropriate public policy interventions that will support the language revitalisation policy currently being pursued through the National Plan for Gaelic. Funding to support Gaelic broadcasting is a central part of that overall strategy. Without this support mechanism in place it is highly unlikely that Gaelic will survive much beyond the middle of the 21st Century.

5.9.12

Agree that the GDS will make a significant and key contribution to the survival of Gaelic. It is possible that a number of sub-strategies need to be in place to support the development of GDS in future years. These strategies would include; economic, cultural, production and content, etc as well as education. The decision on whether a GDS can go ahead or not should not hang on the need for an educational strategy. Almost by definition, the existence of good quality and informative Gaelic programmes add to the educational experience of the viewer, fluent speaker, and learner or interested other viewer. Have any other PVAs used the criteria of education in the past as a means to reach a conclusion on public value?

7. Conclusions

The scoring appears to be highly subjective and do hold up to much scrutiny. Very little quantitative evidence is provided to justify the commentary throughout the document. Additionally, there are many intangible benefits/non-market benefits that have not been taken into account in this assessment. Their value within an overall cost-benefit framework might well exceed the tangible benefits discussed in this assessment.

The risk associated with the £2.5M incremental investment is minimal. It is an investment that is well worth making to support the survival of the indigenous language of Scotland.

Highlands and Islands Enterprise

Further to our response of August 2007, Highlands and Islands Enterprise is pleased to take this opportunity to respond to the initial findings of the BBC Trust's Public Value Test.

Highlands and Islands Enterprise (HIE) is a development agency with remit for the economic and social development of the north-western half of Scotland. HIE maintains significant investment in Gaelic and Gaelic-related projects and organisations towards the development of the region. It is our assertion that the Gaelic language and its associated culture has an important part to play in developing the creative and cultural industries in the Highlands and Islands, and that this investment brings with it associated benefits in breeding self-esteem and raising confidence amongst individuals and communities. HIE would wish to see the Gaelic language and culture celebrated regionally, nationally and internationally as a defining element of Scotland's identity and of global cultural diversity.

Following consideration of the BBC Trust provisional conclusions, HIE's response addresses some of the main concerns highlighted in the provisional report.

The key points made further in this response are as follows:

- The educational remit of the GDS is important but might be delivered primarily through enhanced interactive and online services;
- A commitment to 'attracting new speakers to the Gaelic language' should be secondary to producing high-quality output attracting new viewers to engage with Gaelic programming and the Service;
- Gaelic programming, although created primarily for broadcast through GDS need not be confined to the Service;
- It is important essential that GDS is available on all broadcast platforms and is available 'free to air';
- That GDS should maximise impacts on the creative sectors based in Gaelic-speaking areas;
- Value for money considerations should be made on the basis of GDS potential to create high-quality, diverse and engaging content seven days a week with a commitment to increasing the proposed 1.5 hours per day of original programming;
- The delivery of the Service under the auspices of the BBC will bring with it significant benefits.

Educational strategy is key to public value and partnerships with other organisations

HIE agrees that the GDS has an important role to play in supporting Gaelic learning within and outwith the education sector and the advent of a dedicated linear Gaelic service will constitute a de facto Gaelic learning resource. GDS should not be seen to be primarily a language learning tool. The channel should focus on providing high-quality indigenous content to the community of Scottish Gaelic speakers. It is important though that those with an interest in developing their Gaelic language skills are able to do so through the BBC interactive services (with provision such as enhanced subtitles in Gaelic/English) and through accompanying online resources.

The statement on 'attracting new speakers to the Gaelic language' is worthy, but we would question whether such a commitment should be made quite so explicitly in justifying the BBC's involvement in the Service. It is important that the Channel's output focuses on

providing high-quality and varied output, with a portrayal of a confident and forward-looking Gaelic community rather than the Service self-consciously looking to make the language attractive to non-Gaelic speakers.

HIE has created strong skills-building partnership links with GMS and BBC Scotland through the process of creating the channel, least of which is our investment in broadcasting training at Sabhal Mor Ostaig. Through the partnership with GMS and BBC Scotland, we are implementing our Screen and Broadcast Industry Strategy which focuses on developing talent, nurturing creativity and training the next generation of programme makers in key skills. Our particular emphasis is on ideas development in the first instance as ultimately that is the key to creativity and success.

Wider appeal to audience in Scotland

Wider appeal to audiences outwith the Gaelic community will ultimately be brought about through the production of high-quality, engaging and innovative programming. While the Channel should certainly be marketed widely and maintain a high-profile across the wider population, this should be done on the basis of the Service's output rather than the brand itself. The digital channel is key to substantially strengthening the currently fragile representation of the language and culture in the minds not only of the Gaelic speakers themselves but amongst the wider population.

It would be preferable if Gaelic programming were not to limit appeal to prospective audiences and we would refer to the BBC's public purpose of, 'reflecting the UK's nations, regions and communities'. It is important that the creation of the GDS should stimulate increasing Gaelic output, and serve the Gaelic community (a voice within the wider UK cultural community), but it would be unfortunate if this were to lead to the creation of a 'ghetto' for Gaelic output. The recent Gaelic Act and the resulting National Plan for Gaelic makes a number of references to achieving the 'normalisation' (effectively, the demarginalisation of Gaelic).

Commissioning Strategy and Independent Production up to 50%

In line with HIE's strategy for the screen and broadcast industries, we are working with BBC Scotland and GMS to nurture and develop new creative talent for the industry. The main part of this strategy is to help companies develop their ideas to a broadcast commission at international level. We are developing an industry that can be self-reliant in other cultural/linguistic contexts. This adds to its sustainability within the industry, strengthening and augmenting the independent production sector and fulfilling aspirations for 50% content supply from independent producers. HIE hopes to feed into the development process and into the Gaelic Digital Service Commissioning Strategy, thus adding to the openness and transparency. It is important to note that any expansion in Gaelic programme production resulting from the establishment of a Gaelic channel would create additional capacity to make English language material for independent companies.

HIE considers it vital that the channel commissions a significant percentage of its programmes for production within Gaelic-speaking areas, making use of facilities such as those that currently exist in Sleat, Skye and in Stornoway. The Service can help promote the growth of the creative and broadcast industries in Gaelic-speaking areas and can help create and maintain high-quality Gaelic jobs in such areas – a key part of maintaining the language as a spoken community language. We would urge the Trust to insist that a significant

percentage of staff associated with the GDS are located in Gaelic-speaking areas, and especially those involved in programme commissioning.

Distribution strategy

The inclusion of question six on the current public consultation, namely, 'If you are a potential user of the service, what means of access (satellite, cable, Freeview, broadband) would be the most convenient to you?' raises the possibility of the proposed service not being available on all platforms. Given the prior and quite proper statements on improving the appeal of GDS to wider audiences, the Service should not be in the position of limiting platforms. This would severely limit its potential audience and reduce the service it would deliver to the multi-platform Gaelic community across the UK and Scotland. We would seek public clarification and a resolution to this matter.

The digital channel has to be a properly constructed entity in the new digital environment and must be taken seriously by viewers, programme makers providing content, and other broadcasters. If the channel were not to exist except through perhaps, broadband, the loss of status not only to the channel but to the language would be very damaging. Perception is crucially important and not having a digital channel could communicate negative messages on the status of the language, heritage and culture, especially when comparisons are made with the Welsh and Irish situations. Editorially the quality would be compromised if the platform were not digital as the assumption would be content at the "YouTube" level thus compromising one of the key drivers for public value, namely quality and distinctiveness.

Cost and value for money

Questions on value for money should consider how much it will cost to provide a high-quality and diverse programming schedule which will truly provide a service to the Gaelic-speaking community in Scotland and the UK and maintain and promote the unique cultural perspective of the Scottish Gaels to the enhancement of cultural life nationally and indeed globally.

Outside the broadcasting institutions and independent programme makers who are familiar with programme budgets, there is little real understanding or benchmark of what programmes cost. The idea of the cost of the channel and value for money is therefore relative in public perceptions. BBC1 spends £5 million on a 6-part drama versus a complete Gaelic digital language service providing content that cannot be produced anywhere else in the world for an additional £2.3 million; within this context this represents huge value for money against quality and breadth of what is being delivered.

With reference to what HIE has already guaranteed (and will in the future) the scale of the additional amount the BBC Trust is being asked to sanction seems disproportionately small. The content budget that BBC Scotland commits annually to Gaelic programme making of £2.1 million will presumably still be available if the Trust does not approve the venture.

Delivery through BBC

The creation of the proposed Gaelic Digital Service (GDS) under the auspices of the BBC, with constant and consistent high-quality programming, would encourage learning, strengthen cultural identity and stimulate creativity, cultural excellence and confidence.

Although the GDS could be potentially viable if delivered independently, HIE is keen that the Service be delivered through the BBC. Partnership with the BBC has the potential to bring with it significant additional benefits encouraging a national sense of 'ownership' of the

channel. The BBC has a strong brand and has a long-standing reputation as a broadcaster of high-quality and popular programming in addition to BBC brand loyalty amongst viewers.

Marketing strategy

The Gaelic Digital Channel is a unique opportunity for the Gaels to market the language and culture for the 21st century across the globe, building appreciation of the contribution of Gaelic and Gaelic cultural identity as an element of a global cultural community.

The benefits to the wider cultural sector and the creative industries not only in the Highlands and Islands but across Scotland are potentially considerable. The synergies that the channel opportunities create will provide enhanced levels of added value, and open up relationships with other sectors. The key sectors should include: skills and training, technical hard and software, maintenance, distribution and transport and the resultant media clusters will not only grow with a firm base in the Highlands and Islands. Such developments will also have direct impact on policies being pursued in relation to Gaelic language development.

Highlands and Islands Enterprise warmly welcomes this opportunity to respond as part of the current consultation process and look forward to working in partnership with the BBC and GMS towards ensuring the success of a dedicated Gaelic Digital Service.

Highland Council

The Highland Council area is central to the Gaelic language and cultural heritage of Scotland, and it is also of major significance in the delivery of the objectives of the National Plan for Gaelic which was published by the Scottish Executive in March 2007.

Highland Council is seriously concerned that the BBC Trust is still to be persuaded of the value of investing in the delivery of this service, and it earnestly asks the Trust to recognise the enormous importance of this provision for the maintenance and development of the Gaelic language and culture, and to approve the proposed joint venture between the Gaelic Media service and the BBC.

Proposed new Gaelic Digital Service Highland Council response to BBC Trust's Further Consultation

1) Do you agree that the BBC Trust is right that more focus is required on the educational aspects of the proposed service and also on how it will achieve a wider appeal in Scotland?

As a major provider of Education and Culture services Highland Council is very aware of the important support which broadcast media gives to service providers and also the extent to which the learning experience of the education service clients is enhanced through media support. As the leading provider of Gaelic, and Gaelic Medium, education provision in Scotland, Highland Council naturally aspires to equal levels of broadcast media support to this sector of its service.

As Gaelic Medium Education provision has evolved over the past 25 years, Gaelic broadcasting, and particularly BBC support, has been enormously important. Gaelic broadcasting is widely recognised as an extremely effective means of informing parents and attracting them to Gaelic Medium education for their children. High quality Gaelic television and radio programme output has provided valuable extra resources to Gaelic education. The Council would expect the Gaelic Digital Service to enable the continuation of such provision. Under Section 3 of the Gaelic Language (Scotland) Act 2005, Highland Council is required to produce a 4 year rolling Gaelic Language Plan. This plan has now been submitted to Bòrd na Gàidhlig for formal approval in advance of implementation. The Council's Plan anticipates, among many other initiatives across its full range of services, a significant increase in the uptake of Gaelic and Gaelic Medium Education between 2008 and 2012. Commensurate growth in the support from Gaelic broadcasting would be extremely important to the realisation of this objective by the Council, and to the maximising of its impact.

2) Do you agree with the BBC Trust's decision that if the additional evidence requested is forthcoming and satisfactory, the Trust can approve the new BBC Gaelic Digital Service, subject to conditions outlined in the Trust's report of its provisional conclusions?

The Highland Council has enthusiastically supported the development of a Gaelic Digital service. It is the firm view of the Council that the case for the provision has been well made following exhaustive research and scrutiny of the arguments over many years. The Gaelic Act commits Scottish Government and all public authorities in Scotland to make provision

which will accord Gaelic equal respect with English and this process will inevitably raise awareness and interest in Gaelic and significantly increase interest in acquisition of the language. The Gaelic Digital Service will be an essential part of the delivery mechanism for this process. Highland Council is totally convinced that its audience base will grow substantially over a relatively short period of time. For the wider Scottish audience the new Service will positively enhance their viewer options and enhance the range and diversity of broadcasting in an increasingly culturally diverse Scotland.

3) *Do you agree with the statement that if the additional evidence requested is not forthcoming then it is unlikely that the service will create sufficient public value for approval?*

Highland Council believes that further erosion and the loss of the Gaelic language and culture would be an enormous loss to the UK.

With the exception of the BBC2 Scotland Thursday evening broadcasts, present Gaelic television provision is sporadic across transmission schedules. There can be no doubt that potential viewers are lost through lack of awareness of the time and location of programmes. The creation of a dedicated service which viewers can access on a specific site and time sequence on a daily basis will make an extraordinary impact for the status of Gaelic, and wider public awareness of it. The optional provision of sub-titling on the service will enable access to everyone with an interest in Gaelic in Scotland, and it will provide an open and welcoming access for new viewers.

Independent research by MRUK, for the BBC and Bòrd na Gàidhlig in 2003, demonstrated that a substantial percentage of the Scottish population has sufficient interest in Gaelic and its culture to be attracted to access the Gaelic Digital Service. The Gaelic Language Act recognises Gaelic as a unique part of Scotland's national heritage, and the Gaelic Digital Channel can realistically expect national interest and uptake of its output.

4) *As an individual, do you believe that a service with the conditions suggested by the Trust would appeal to you either as (a) a Gaelic speaker, (b) a learner of Gaelic or (c) someone with a wider interest in Gaelic or Scottish culture?*

As detailed above Highland Council's Gaelic Language Plan will be implemented under the terms of the Gaelic language (Scotland) Act 2005, and the National Plan for Gaelic. The Council expects that the roll-out of its Plan will substantially increase awareness of Gaelic language and culture across the Highland Council area. It is very clear that the Gaelic Digital Service will be a vital support structure to the implementation of the Plan. The Council's experience to date demonstrates a growing interest in Gaelic generally, and a rapidly increasing demand for language learning classes and support.

The new Gaelic Digital Service will be critical to meeting this increasing interest and demand in Highland Council's area and, we believe, across Scotland and internationally.

5) *Do you believe that the additional incremental spend by the BBC each year of £2.5 million plus distribution costs would create sufficient additional public value to justify this investment?*

As stated above, Highland Council is totally convinced of the public value which will flow from the BBC investment in the new Gaelic Digital Service. In addition to the clear benefits of delivering a measure of equality of provision to a distinct indigenous linguistic community of Scotland, the BBC investment will also contribute to the delivery of Scottish and UK Government commitments to the maintenance and development of the Gaelic language and culture. It will also make a significant economic impact in terms of new employment across all skills sectors of Gaelic media, thus complimenting government policy and other investment.

Most importantly of all it will “inform, educate, and entertain” those people of Scotland who are users and, or, learners of Gaelic, or who are interested in viewing from the perspective of a different language of their country. The Gaelic Digital Service will provide a new window on Scotland, and on the world from Scotland, for all viewers.

6) *If you are a potential user of the service, what means of access (satellite, cable, Freeview, broadband) would be the most convenient to you?*

As has been stressed above Highland Council believes this service to be absolutely critical to the realisation of all national aspirations for Gaelic in Scotland. Consequently the Council believes that the service must be given the widest and most comprehensive distribution possible. It is for this reason that all supporters of this service have welcomed the potential partnership with the BBC, where experience, expertise, and existing distribution systems would enable the realisation of such maximum distribution and impact.

Highland Council is firmly of the view that this Gaelic Digital Service should be available across Satellite, Broadband, Cable and Freeview. While the Council is aware that there is currently a lack of Freeview capacity, it believes that making the Service available on Freeview immediately capacity becomes available after switchover will be critical to the success of the Service itself and also to the future of Gaelic.

Highland Council also believes that all other appropriate new media distribution platforms should be exploited for the benefit of the Service wherever possible.

7) *Do you believe the withdrawal of the Gaelic zones on BBC Two is an appropriate measure if a Gaelic DTT (Freeview) Channel is established?*

Highland Council believes that the BBC 2 Gaelic block should remain until switchover has been implemented across Scotland. Earlier withdrawal could mean the loss of a key part of regular Gaelic television output for a large percentage of viewers across Scotland.

The Council understands that the majority of viewers will access television by Freeview after switchover, and for that reason the Gaelic Digital Service must be available on Freeview. The Council has been encouraged by the spirit of OFCOM’s approach to DTT.

“Our proposals describe how this huge prize can be achieved without needing more spectrum, while protecting existing viewers’ access to the existing PSB services.” Ed Richards
OFCOM - The Future of Digital Terrestrial Television

8) *We would be particularly interested in responses from potential educational partners and others involved in the promotion of Gaelic about your views on the possibilities to work in partnership with the GDS.*

Building on the past experience of working with the BBC and other broadcasters as described above, Highland Council would welcome the opportunity to establish and develop an effective working partnership with the GDS.

9) *We would be particularly interested in views from industry respondents about the process for commissioning and the targets proposed by the Trust?*

Highland Council does not feel competent to comment on this.

10) *Do the conditions proposed in the draft BBC service licence seem appropriate?*

The conditions appear to be appropriate.

11) *Are there any other issues you would like the BBC Trust to consider in relation to the proposal?*

The Highland Council Administration is committed to working for the increased prosperity and wellbeing of people living and working in the Highlands. Its aim is to create a greener and sustainable Highland Council, which places equality and fairness at the centre of the way it conducts business. The Administration has identified 10 strategic priorities action areas to achieve its objectives, and Gaelic language and culture is one of these priority areas. In acting on these priorities Highland Council will always seek to identify and establish effective partnerships for action, and it believes that the BBC Trust is now in a position to contribute as a significant and effective partner in the process of delivering for Gaelic in Scotland.

Gaelic is part of the unique heritage of Scotland. If Gaelic dies in Scotland, it will be dead irrespective of its diaspora. Highland Council recognises its statutory responsibility to act for the maintenance and revitalization of Gaelic. It believes that a living Gaelic language and cultural heritage will enrich the life and identity of Scotland and also add real value to the experience of visitors.

The Gaelic Digital Service has the potential to help deliver all of these aspirations, and the Highland Council earnestly hopes that the BBC Trust will do all in its power to facilitate its delivery.

Isle of Gigha Heritage Trust

I understand that in reviewing the proposals for a Gaelic Digital Service, you are concerned that there has, so far, been insufficient evidence provided to conclude that the likely level of public value would justify the proposed level of investment.

I write on behalf of the Isle of Gigha Heritage Trust, the community owners of the Isle of Gigha, in support of the proposals for a Gaelic Digital Service.

I would like to highlight the following:

- the importance of the Gaelic Digital Service not only to Gaelic speakers but to Scotland as a whole
- its positive impact on the quality and diversity of broadcasting in Scotland and in the UK
- the importance of a dedicated Gaelic channel, for language development reasons and to satisfy audience demand
- the importance of the service being widely and easily accessible by as many viewers as possible

I should also like to emphasise that good quality programmes will always attract viewers. Gaelic programmes such as *Eòrpa*, *Tir is Teanga*, *Rapal TV*, etc. appeal to viewers who are not Gaelic speakers and are strong brands across both the bilingual audience and the English-only audience.

Programming focusing on music and sport will also attract wider audiences. Emphasis on Scottish/Highland issues, etc will create unique selling points which will draw audiences from beyond the Gaelic community.

Optional English subtitling will make all these programmes accessible, as will additional online resources in certain genres. Online support, in the form of glossaries and downloadable scripts, for example, will also enable learners of Gaelic to watch Gaelic programmes with increasing confidence and understanding.

I urge you to support the proposals for a Gaelic Digital Service.

Jansvans

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- the importance of the Gaelic Digital Service not only to Gaelic speakers but to Scotland as a whole
- its positive impact on the quality and diversity of broadcasting in Scotland and in the UK
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I urge you to support the proposals for a Gaelic Digital Service.

MacTV

Summary

Mactv welcomes the BBC Trust's provisional conclusions on the proposed Gaelic Digital Service.

In particular we welcome the Trust's request to the Executive for a document stating the commissioning strategy for the channel which will clarify how the joint venture will actually commission individual genres. The Trust is encouraged to ensure that this document also meets the recommendations of the Ofcom MIA, which the Trust has accepted, with regard to transparency of commissioning practices and complete independence of commissioning from in-house BBC production.

We also welcome the clarification that *Current Affairs* will not be ring fenced for in-house BBC production.

In addition we welcome the proposed conditions of launch especially the requirement for clear evidence of how the commissioning strategy will minimise the partnership risk of the joint venture and that clear processes and terms of trade must be in place.

There are, however, a number of areas where we consider that the provisional conclusions should be strengthened.

With regard to the use of independents in news gathering the Trust's statement that "it encourages the Executive to look at such options" is somewhat feeble and doesn't even match the Ofcom recommendation that GDS "should actively consider using the independent sector to contribute to news gathering".

With regard to commissioning from independent producers the Trust's attempt to clarify the vagueness of the Executive's ambition is unsatisfactory. The Trust is encouraged to at least set a target that a minimum of 25% of BBC commissioning, measured by value, is from independent producers and that this applies from launch.

Background

It is clear that there will be two commissioning routes for GDS. Route one will be for GMS funded commissions and route two for BBC funded.

In its business plan, already agreed with Ofcom, GMS has a target minimum spend in the independent sector of 50%. GMS already exceeds its minimum, last year the GMS spend in the independent sector was 63%.

The channel cost figures stated by the BBC Executive in its submission to the Trust were somewhat confusing and difficult to reconcile. The Trust has now, in its provisional conclusions, appeared to give a different set of figures for the cost of the channel.

What is clear, however, is that if News provision and Radio nan Gaidheal are excluded that the increase in funding by the BBC for television content is minimal.

What is further clear is that by far the greater proportion of funds available for television content will be provided by GMS.

The Trust has indicated that the target spend in the independent sector for GDS should be 25%. Whatever the real figure of proposed GDS spend the GMS spend in the independent sector is already exceeding 25% of GDS spend. Therefore, the Trust's figure of 25% cannot be considered a target to be attained by GDS and is in fact so far below the existing actual as to be largely meaningless.

As GMS already has and is exceeding its target the Trust is encouraged to set a target for the BBC spend only. This target should be at least 25% of BBC spend.

The GMS target, in its business plan, is measured by value. To ensure consistency across GDS the BBC target should also be measured by value.

The Trust has stated that its target of 25% should only apply from year two. It has not indicated a reason for starting this in year two. However, it is possible that the Trust has been influenced by the Executive's statements - "subject to a sufficiently developed Gaelic production base" which infers that the capacity does not currently exist within the independent sector to meet the additional commissioning proposed for GDS.

The Executive, having made such an inference, did not provide any evidence to support it. Mactv in its earlier submission stated that, in anticipation of GDS, we have already increased our capacity to deliver content. The Executive in its initial submission (Preliminary Market Assessment) listed 19 suppliers who supply content to Gaelic broadcasting. This indicates a sizeable supplier base. Mactv believes that the independent sector is already sufficiently developed to provide additional content at the very modest levels proposed for GDS.

Mactv, therefore, believes that any target should apply from launch.

NUJ

The NUJ would like to make the following comments in relation to the Trust's consultation on the proposed Gaelic Digital Service.

'The NUJ welcomes the creation of jobs in Scotland and welcomes the creation of jobs for trainee journalists in an area where they would not normally be created. It is good for Gaelic speakers in Scotland and could be helpful by developing and reflecting the wider Scottish Cultural provision. We would support the BBC's desire to create new services as long as these are not at the expense of the BBC's core public service remit.'

PACT

Executive summary

- 1) Pact broadly welcomes the BBC Trust's initial conclusions that the timeframe for external commissioning is "vague" and the clarification that the service will commission at least 50% of content from independents, rather than up to 50%.
- 2) In our view, however, the proposed commitment to the independent sector does not go far enough to ensure that the service maximises its potential to foster creativity in the Gaelic and Scottish production sector. The proposed initial quota for independents of 25% is expected to represent less programming by value than indies are currently successfully producing for the Gaelic Media Service (GMS) alone. Based on the figures in the BBC's original PVT application, 25% of total non-news television and online spend for in-house and external production by the Gaelic Digital Service (GDS) amounts to just approximately £3m. This is significantly below the amount independents currently win from the GMS, which was £4.5m last year excluding radio.⁶
- 3) It is also worth noting that the proposed independent quota is, we understand, by hours, not value, and therefore the actual value of a 25% quota likely to be even lower than £3m.
- 4) Just as importantly, this £3m is also significantly below the 50% minimum of GMS funds that are to go on independent commissions under the proposed service – which would be over £5m.
- 5) An independent quota of 25% is therefore likely to be too low to be fit for purpose. At that level, the quota will not make any further impact on the GDS's commissioning practices over and above the requirement to spend 50% of GMS funds on independent commissions, and will therefore not encourage the GDS to commission more openly or foster creative competition.
- 6) We would therefore suggest that a minimum of 50% - approximately £6m in value - is far more likely to achieve this. We have proposed that an independent quota of at least 50% should be introduced immediately on launch of the service. As we have outlined, we do not envisage that making such a commitment immediately will entail any substantial increase in current investment levels in the independent sector at all, and would therefore not represent any risk to the service. Rather, making a firm commitment effective immediately would incentivise the production sector as a whole to scale up, or enter the Gaelic market, and thereby help fulfil the BBC's Charter commitment of "stimulating creativity and cultural excellence,"⁷ as well as helping offer audiences a more diverse range of content.

⁶ Independents accounted for 63% (£4.5m) of total GMS commissions excluding radio (£7.1m) in 2006/07, according to the GMS annual report.

⁷ BBC Royal Charter, 4.

- 7) It is also important to bear in mind that the Gaelic production sector is now facing a situation where the new service will be a monopoly buyer. While Ofcom has concluded that there will be no negative market impact because of a net increase in funding for commissioning, we would argue that having a monopoly buyer inevitably risks creating an adverse effect – suppliers are highly likely to be more reluctant to scale up or enter the market as a result. Ofcom’s work in the last public service broadcasting review was clear that a monopoly in commissioning is dangerous, and the BBC’s own market impact assessment for this Public Value Test also agreed with this point.
- 8) In addition to an immediate 50% quota for independents, we therefore ask that the Trust considers our earlier proposal that the service aim to eventually commission 90% of eligible content from independents, with the remaining 10% open to all would-be suppliers. This would further act as a catalyst for the growth of the external supply sector, and might be introduced in its second year of operation.
- 9) We would finally like to add that, although the Trust must of course be convinced by BBC management of the public value for any new service to go ahead, we still firmly believe that a dedicated Gaelic service can potentially have a strong benefit to the cultural life of Scotland and Gaelic speakers, as well as to fostering the growth of the production sector. Such a service should be launched as soon as possible if and when the Trust is convinced of its value.
- 10) In this area, Pact notes that one main issue of concern on the part of the Trust is educational content, particularly for Gaelic learners. Pact members currently making Gaelic programming are equipped to provide high quality programming to fulfil this remit, if it is commissioned. Pact members who work in Gaelic have considerable experience creating educational material for a wide range of outlets, including Channel 4 television, online, the Scottish Government and various education authorities.

Response to provisional conclusions

- 1) We welcome the Trust’s calls for responses to its provisional conclusions regarding independent commissioning. We are, however, concerned that the proposed framework does not go far enough in fostering innovation and growth in the Gaelic and wider Scottish production sector.

Timeframe for indie commissioning

- 2) We welcome the acknowledgement that the Trust and Ofcom both agree that the timeframe attached to achieving the proposed 50% base for independent commissioning is “vague”. However, in our view the alternative timeframe proposed by the Trust should be more immediate.

- 3) The Trust states that it has considered two factors in its thinking in proposing these targets: the increase in the volume of production necessary for the new service; and the targets for independent production elsewhere.
- 4) In terms of the supposed increase in production volume, a 25% minimum quota for independents represents less programming by value than they are currently successfully producing for the GMS alone. This is based on the figures for investment in television and online production (in-house and external) in the BBC's original PVT application, which states that GMS will provide £10.1m and the BBC will continue to invest the £2.1m it currently spends (we have excluded the BBC's additional £2.3m from our calculations as this is to go on news and is therefore not eligible for independent commissions).
- 5) The net result is that independents will be guaranteed 25% of £12.2m, or just £3m. This is significantly below the amount independents currently win from the GMS, which was £4.5m last year.⁸
- 6) It is also worth noting that the proposed independent quota is, we understand, by hours, not value, and therefore the actual value of a 25% quota likely to be even lower than £3m.
- 7) Just as importantly, this £3m is also significantly below the 50% minimum of GMS funds that are to go on independent commissions under the proposed service – which would be over £5m. An independent quota of 25% is therefore likely to be too low to be fit for purpose. At that level, the quota will not make any further impact on the GDS's commissioning practices over and above the requirement to spend 50% of GMS funds on independent commissions, and will therefore not encourage the GDS to commission more openly or foster creative competition.
- 8) We would suggest that a minimum quota of 50% is far more likely to achieve this. This would not place unrealistic demands on the independent sector. Independents already deliver £4.5m in commissions for the GMS alone; 50% of all non-news spending under the new service would amount to approximately £6m (although it may be less as the quota is based on hours). As we have noted in our earlier submission, many companies have already scaled up in anticipation of the new service, and contraction in commissioning at other broadcasters, both in Gaelic and English-language Scottish programming, will inevitably increase competition for independent commissions from the GDS.
- 9) In our view the Gaelic production sector has sufficient scale to deliver a larger commitment: it boasts a wide range of companies of different scale, with a strong track record of successful programme-making. The BBC's list of Gaelic companies fails to take into account non-specialist companies that are involved in Gaelic programming, and under-represents the scale and potential of the sector.

⁸ Independents accounted for 63% (£4.5m) of total GMS commissions excluding radio (£7.1m) in 2006/07, according to the GMS annual report.

- 10) We note Ofcom’s market impact assessment reported a widespread level of confidence in the supply sector that it could meet a greater level of commissioning, stating that: “Respondents from the Gaelic independent sector considered that they were well placed to take on any extra commissioning.”⁹
- 11) Secondly, it is in our view not appropriate to use the independent quota in other areas of the BBC as a comparison. Investment into the independent sector from the GDS is in reality coming largely, not from the BBC, but from the GMS. This means that the licence fee is not being used, directly at least, to foster creativity in the creative industries as whole, as it is required to do under the Charter.
- 12) We would therefore suggest that the minimum commitment of at least 50% of content to be from independents should be effective from the launch of the service. This does not represent a significant increase on current production levels in terms of value and we would therefore suggest does not involve any risk to the service. Instead, it will set a clear incentive from day one for all suppliers to compete for commissions.
- 13) The service should then work towards increasing this commitment. We suggest it aims for a minimum of 90% of eligible content for independents, with the remaining 10% contestable for all, in the second year of operation, for reasons outlined below.

Level of independent commissioning

- 14) Ofcom has concluded in its Market Impact Assessment that, as the service represents an increase in available funding for independents, there is no negative market impact for the sector. This is only half the story for companies working in the independent sector. Not only is the guaranteed increase in investment only modest, the new service quite clearly will enjoy a position that is far more dominant than any broadcaster currently has in Gaelic. It will be the only commissioner of Gaelic content.
- 15) Ofcom’s own work on plurality in public service broadcasting states that plurality in commissioning sources, as well production and outlets, is desirable, both from the point of view of the audience (ensuring the best ideas reach the screen) and from the production sector.¹⁰ Under the new service, there will be only one route to market for Gaelic commissions. This is not an attractive business model for a company working in or considering entering this sector, unless appropriate measures are taken.
- 16) This was also acknowledged by BBC management’s market impact assessment for the GDS, which states: “There will be fewer players in the Gaelic television broadcasting market (and hence less competition and fewer routes to market for Gaelic television content).”¹¹

⁹ Market Impact Assessment of the BBC/Gaelic Media Service Gaelic Digital Service, Ofcom, page 11.

¹⁰ Review of Public Service Television Broadcasting, Phase 2, Ofcom, 5.13.

¹¹ BBC Management’s preliminary market impact assessment for the Gaelic Digital Service, page 40.

- 17) It adds: “The monopsonistic relationship the BBC/GMS will have with the suppliers of its programmes does bring downsides (such as dependencies and difficulties in providing a platform for new ideas).”¹²
- 18) Our previous proposal that 90% of GMS funds should be earmarked for independents, with the remaining 10% being contestable between BBC in-house and all external suppliers, was aimed at counteracting this monopoly. Our goal was to foster as much creative competition in the programme supply market as possible under a monopoly buyer. Ofcom’s market impact assessment does not dispute that the GDS will be a monopoly buyer and we therefore believe the Trust should again consider our previous proposal.
- 19) As mentioned above, we would suggest that the service should work towards increasing its independent commitment to 90% along a similar timeline as proposed by the Trust. We suggest that it aims for a minimum of 90% of eligible content for independents, with the remaining 10% contestable for all, in the second year of operation.
- 20) We would also welcome more details on the framework and timeframe for the proposed negotiations with key stakeholders over the content supply strategy.

Eligible content

- 21) The Trust also concludes that there should be a ring-fence around news operations for in-house, but does not refer explicitly to current affairs, which were also excluded from qualifying hours for independents in BBC management’s proposals. We assume that the Trust concludes that current affairs should be part of qualifying spend even if news is not, but would welcome confirmation that this is the case.
- 22) We have previously argued that the qualifying hours for the independent quota should include current affairs, and would welcome confirmation that the Trust has indeed concluded that this should be so. As we have previously stated, we see no reason why independents should be excluded from competing for current affairs commissions from the new service. Independents already successfully produce current affairs shows for a range of network and regional services, ranging from Question Time (Mentorn) for the BBC and Dispatches for Channel 4. For Gaelic services, Mac^{tv} has produced three series of a weekly current affairs series (Ceann-La) on Scottish and Grampian TV, as well as two episodes for the GMS-funded current affairs programme Eorpa on BBC.
- 23) Allowing independents to compete for current affairs commissions would be in line with Ofcom’s conclusions in its market impact assessment that no genres should be ring-fenced for in-house.

¹² Ibid, page 45.

Commissioning

- 24) We welcome the Trust's conclusion that there should be clear processes and terms of trade in place for how commissioning, particularly from the independent sector, will function and be transparent.
- 25) We also welcome the Trust's conclusion that there should be clear and public statements detailing how the commissioning process will operate in a transparent manner, and that there should be clarity on how the service will ensure that commissioning and in-house production are independent. This is vital in ensuring a meritocratic approach to commissioning, and has been embraced by other parts of the BBC, and we look forward to further details being made public.

Online

- 26) We strongly support the Trust's decision that there should be clarity in online rights, and we welcome the Trust's conclusion that independent producers should be able to compete for commissions for any online-specific content.¹³
- 27) There remains, however, significant uncertainty amongst the production sector as to the new service's proposed online strategy. We are unclear if the 50% target for independent commissions proposed in the Trust's provisional conclusions encompasses online production as it is referred to variously in the context of both the television service and the service as a whole – although as the 50% is by hours we would assume this is an inappropriate mechanism for judging online content. We would welcome clarification on this, both in terms of on-line specific content and as part of multi-platform commissioning.

¹³ Gaelic Digital Service: Public Value Test provisional conclusions, page 11.

Pobal

Having recently participated in the first BBC Audience Council consultation on Irish language broadcasting in the north of Ireland, POBAL, the umbrella organization for the Irish speaking community in the north of Ireland, is rather concerned at some of the recommendations being put forward by the Audience Council in respect of Gaelic broadcasting and the BBC in Scotland.

It appears to me that in the case of both the Irish language and Gaelic in Scotland, the positive impacts on the quality and diversity of broadcasting in Scotland, in the UK and in NI of digital services in future provision cannot be underestimated. The Gaelic Digital Service for Scotland is important not only to Gaelic speakers but to Scotland as a whole [and indeed to other minoritised language not only in the UK and Ireland, but also further afield.

Minoritised languages require dedicated channels, a point which has already been grasped in Wales for Welsh. Although the demographics of Gaelic in Scotland are rather different, the principles of impacting on language development, serving the living community which uses the language, supporting learners and generating economic opportunities for Gaelic speakers in Scotland are of key importance.

It is often a feature of minoritised language broadcasting that it is difficult to obtain, poorly publicized and inconsistently programmed, leading to confusion and demoralization amongst the audience and the perception that the provider is not serious about the service. Gaelic service in Scotland must therefore be widely and easily accessible by as many viewers as possible (also through streaming on the internet and other web services) and should be available as soon as possible on all platforms: Freeview (DTT), FreeSat, Sky, cable and new/emerging digital platforms.

The users of minoritised language in the UK and Ireland have often complained that their needs are undervalued and under-provided for. The provision of a full service to the Gaelic community is not an option, it is a duty and must be recognized and treated as such.

Poetry Scotland

1. No, I think you should go for it regardless of apparent support now. It will achieve a wider appeal by being there. Anything that can be done should be done to assist this language which was almost bludgeoned to death by the British and Scottish authorities less than a century ago.
2. This is all too provisional. I want this service now.
3. No.
4. Yes I want this service. I have been learning Gaelic for years, and I have a wider interest in Gaelic and Scottish culture, and I would be able to speak it properly by now if there were more good services. For instance I used to have the Gaelic radio on in my car when I lived in Edinburgh, but once you get to the Gaelic speaking areas you lost the frequency. I went to classes in Callander and Killin but they were cut by the local authority. I look for BBC website news options in Gaelic (and Scots) and can find none. I even sometimes read the news in Welsh.
5. Quite frankly it is useless asking a question like this to a lay person without reference to the whole BBC budget. Anything with million on the end sounds a lot of money but this is a worthwhile and needed service. A lot of the people it will benefit are not aware it will benefit them, unfortunately.
6. Broadband
7. No. Keep it coming. We need more not just different.
8. Well I just run an unfunded poetry magazine that publishes a small proportion of Gaelic poetry among English and Scots poems, and some Gaelic poetry books. Its called Poetry Scotland. We include Gaelic (and have done since the first issue) because it is an inseparable part of Scottish poetry and culture and thank goodness there are still some folk able and idealistic enough to write poetry in Gaelic. I would like our readers to be able to hear the poems in Gaelic as well as to read them on the page. I would like them to be able to move out from reading a poem to access wider background in and about the Gaelic language. I would like it made very easy for them to do this. You can easily find our website though there's not much Gaelic on that, either - we have the whole range of Scottish languages to think about and of course most of it is English after all. This is led by the readership where appreciation of Gaelic is fragmented geographically and even with our supposedly! culturally aware readers many of them get along nicely without Gaelic thanks and we've just got to drive it further, if it isn't our responsibility whose is it?
10. No
11. Yes Gaelic bookselling. We have an antiquarian bookshop and we take a few new Gaelic books to sell, when we go to book launches etc but it is frequently announced on the radio that books are only obtainable at the Gaelic Books Council's own shop in Glasgow. This helps to put people off seeking the books nationwide. Quite a few small publishers who feel

passionately enough about Gaelic to put their own effort and money in (like us I suppose) sometimes come round our shop with items (such as calendars) that are not getting seen by enough people, because places to sell them barely exist. The BBC could help by giving lots of publicity to all Gaelic material - not just the official output, for after all a language only begins to exist when people begin to publish it freely....and none of this is in the least subversive, unless merely speaking and using and spreading a language is subversive. You sometimes wonder.

RSA

Since its inception in 1754 the RSA has encouraged the development of a principled and prosperous society in which human potential can be fully realised. Today, supported by more than 25,000 fellows (of which some 1,250 are resident in Scotland), we do this through five manifesto challenges:

- encouraging enterprise
- moving towards a zero waste society
- developing a capable population
- fostering resilient communities
- advancing global citizenship

The RSA, through its Scottish Committee, participates in consultations, normally arranging consultation meetings at which its Fellows (who represent a very wide range of professional fields across the public, private and voluntary sectors) can discuss issues and agree a range of points to be included in comments for approval by the RSA Board of Trustees. In this case the timescale for responses is too short and we have therefore informed RSA Fellows in Scotland of the consultation, encouraging them to respond directly by the closing date of 19 December. The Scottish Committee of the RSA would, however, like to comment on the broad issue of determining the “Public Value” of the proposed Gaelic Digital Service (GDS), as follows:

It is the view of the Society that to focus on the narrow educative aspects of the GDS as suggested in the Provisional Conclusions and to base the estimate of its “Public Value” primarily on this would be wrong. The GDS has the potential to connect those living in Scotland - whether or not they are Gaelic speakers - to their Scottish heritage, culture and identity and in doing so it would also provide a platform for the regeneration of the Gaelic language. We therefore recommend that the BBC Trustees should take full account of the cultural impact of the GDS and the potentially wider audience for the new service.

Please note that this response does not necessarily represent the views of the RSA’s Fellowship as a whole, nor necessarily those of individual Trustees of the RSA.

Sabhal Mòr Ostaig

Summary of substantive points

- support for a GDS from SMO
- SMO as centre of excellence and key provider for Gaelic education
- immersion in and normalisation of the language demonstrates congruency
- synergy in FAS, for economies of scale and creative programming
- cultural materials in the media sustain Scotland's invisible earnings
- SMO has increased accessibility of Gaelic and reached worldwide audiences
- SMO's capability for supporting media output with expertise and resources
- dedication to high quality and authenticity

Preamble

SMO welcomes the proposal from the BBC Executive to launch a Gaelic Digital Service [GDS] and recognises the desirability of exploring the concept of public value for the proposed service.

SMO would like to endorse strongly the case for a GDS, in the steady and well-founded conviction that it can support the purposes and public value of a GDS. SMO is the National Centre for Gaelic Language and Culture and key player in the development and provision of Gaelic orientated education, and is therefore especially well-placed to comment on and to strengthen the focus on educational aspects of a GDS. The experience of SMO demonstrates how normalisation of and immersion in Gaelic is the most effective form of education in the language.

There will be strong potential for partnership in a GDS, or a perceived opportunity (to be explored) to create partnerships, given a clear congruency of purpose, in the broadest sense for example of the GDS remit to offer television, radio and on-line service with content in the Gaelic language. SMO would use to the maximum, where appropriate, the content to be broadcast on a new channel and would support the provision of ancillary material such as on the BBC Alba web (to which SMO has already contributed) and web-based scripts. Arguably now also, with the development of FAS, the Centre for Creative and Cultural Industries, the potential for synergy in economies of scale and creative programming is hugely enhanced.

Market impact

Following the Public Value Assessment [PVA] by the BBC Trust and Market Impact Assessment by Ofcom (as outlined in the BBC Trust Public Value Test paper), we are encouraged, in the first place, that the PVA has identified public value in the GDS proposal and, secondly, that the MIA concludes that there are significant positive market impacts. Statistical data from SMO would reinforce projections for the GDS. We see the strength of the terms of reference but consider that '... likely adverse impact on the market ...' seems a possibly disappointing premise (see §1.4). To what extent this might be perceived as offsetting 'likely public value', seems to compare incomparables in the context of a supply of information on and in the Gaelic language. The support of culture and language *per se* creates and carries immeasurable public value.

Gaelic culture in the broadest and in specific senses can be seen as vital contributions to 'invisible earnings' for the Scottish and British economies. The ongoing demand for

resources and material from a Gaelic ‘cultural-economy’ points to a very positive situation and huge potential for development, and the production factors of ‘people plus resources’ (for example both intellectual and archive resources) make for a healthy monetary economy. SMO exemplifies this ‘cultural-economy’ perspective. Part of the vital role that SMO plays in the strengthening of the language is in operating commercial enterprises such as *Cànan* for creative learning, design, language and software research and development.

Reach

SMO understands that the case for a new service will require to be strengthened with further evidence in respect of its potential reach. The development and application of strategies to reach beyond the current Gaelic-speaking communities is at the core of the SMO’s work as college of further and higher education. Criteria of sustaining and strengthening the language are very much within the sphere of SMO, its educational purposes and activities. SMO’s record of reaching beyond the Gaelic-speaking community must offer very positive encouragement for the creation of a GDS in that it has been remarkably and demonstrably successful in creating a public, an audience and a market for Gaelic more or less throughout the world. The same advantages may be gleaned by the GDS, but effectiveness would depend on distribution by Satellite and on Freeview.

The sharing of experience in networks and partnerships could exponentially increase the ‘reach’ of programming, and the ‘added value’ potential realised from congruency of purpose would support the core work of developing and delivering educational strategies and attracting new speakers to the language. The usefulness for education and accessibility of online material already demonstrates that the Gaelic community is a nationwide one.

Education and access

It is evident, especially in urban and city audiences, that Gaelic-medium programmes appeal more widely, reflecting probably strong affinities to material corroborating concepts of culture and identity. Gaelic therefore now appeals to a wide audience and its profile has grown over the last decade, reflecting how interest in Gaelic language and culture has been developing. The corollary of an increase in scale in the Gaelic media sector has also put pressure on the Gaelic ‘heritage sector’ to establish benchmarks and standards of quality. To support these in the future and to build on them, programming suggestions could come from SMO and would fortify the requirements for the GMS.

SMO has created a centre of excellence for Gaelic where the amassing of expertise and resources will make available ideas and material particularly appropriate for factual programming, for example in supplying material for archive content. The library and archive resources of SMO are of outstanding value for Gaelic culture and offer a wide range of opportunity for programme making. The *Tobar an Dualchais* project has begun its work of digitising 12,000 hours of Gaelic and Scots sound recordings to create a public sound archive of unique value. Graphic material both in artwork and archive imagery is held at SMO and would enable programming to access authentic and properly documented material.

The role of a GDS is to further enhance the public value of broadcasting. A vital part of the public purpose of the BBC is to reflect the nation’s regions and communities and, in this area, the enriching potential of the Gaelic heritage has long been recognised. Concepts of

identity have crowded the *Zeitgeist* and broadcasting in Gaelic has added value to these concepts. In the current climate of 'multi-culturalism', there is a tendency towards the homogenisation of British culture and a blurring of regional and ethnic distinctions. Gaelic itself is not, of course, a homogeneous element in regional terms within the British cultural make-up and ethnic and geo-political factors make for a still-evident rich cultural mix. Part of the purpose of SMO is to conserve and strengthen the marked regionalism within Gaelic as well as its monolithic status.

Scottish Parliament Cross-Party Group on Gaelic

1. The Scottish Parliament Cross-party Group on Gaelic (“Cross-party Group”) believes that the new Gaelic Digital Service will play an important role in the future development of the Gaelic language. It also believes that Gaelic education currently benefits hugely from the high quality BBC educational programmes currently available in schools. The new Service will greatly extend the range of services available both within and outwith schools and at times that are suitable for all. This new flexibility will also be invaluable to those who are not indigenous Gaelic speakers.

Independent research shows quite clearly that Gaelic television is one of the most significant elements in positively influencing parents’ choice of Gaelic Medium Education for their children. The new Service will enable this link to be strengthened by making high quality programmes available at times that are suitable for the audience and will also enable non-Gaelic speaking parents to better support their children with home-work.

2. The Cross-party Group believes that the proposed new Gaelic Service is vital in terms of the future development of the language. It further believes that the case for its establishment has already been made. We therefore agree that the BBC Trust should establish the new Service without any further delay, once the additional evidence has been submitted.

3. The Cross-party Group believes that there is sufficient evidence, drawn from many years of research, that proves that the new proposed Service will attract audiences far in excess of the number of Gaelic speakers in Scotland. With advances in new technology, e.g. availability of optional English subtitling, these programmes will attract an increasing number of viewers from areas far beyond traditional Gaelic speaking communities. This, in the Group’s opinion, makes the service viable and represents good value for all of Scotland and not just for the Gaelic speaking diaspora.

4. A wide range of high quality programmes in Gaelic will appeal to non-Gaelic speakers as well as Gaelic speakers. The proposed new Service will include News, Sport and Music programmes as well as programmes dealing with Scottish/Highland issues and will attract viewers from across Scotland. Examples of high quality programmes that attract large numbers of non-Gaelic speaking viewers include, Eorpa, Tir is Teanga and Rapal TV. Advances in technology will allow on-line support in the form of downloadable materials, website interaction, mobile phone link-ups and other facilities which will allow Gaelic learners to participate and watch programmes with increasing confidence and understanding.

5. The Cross-party Group believes that the additional spend of £2.5 million plus distribution costs is a small premium to pay for the future well-being of the Gaelic language and that the resulting economic benefits will more than compensate for this relatively small investment. The new Service will help create many employment opportunities, both in front of, and behind the camera, in many economically fragile areas of Scotland where the Gaelic language is still used as a community language. This will generate economic benefits for those communities and is considered by the Group as representing additional public value

6. It is vital that the new Gaelic Service is available across all platforms, Satellite, Freeview, Broadband and Cable. It is accepted that there is currently little or no capacity available on

Freeview for the new Service but it is vital that the Service is made available on Freeview, when additional capacity becomes available, immediately following switchover. The use of other new media platforms, e.g. Mobile phones, iPod, MP3 Players should also be explored and developed as delivery mechanisms for the new Service.

7. It is the Cross-party's view that the Gaelic Zone on BBC Two should not be withdrawn irrespective of whether the new Gaelic Service is available on Freeview. In the short-term, there are many viewers throughout Scotland who will continue to access programmes via the analogue service whilst it is available. It is the Cross-party Group's view that, in the longer term, following switchover and when it is likely that the Gaelic Service will be available on Freeview, the Gaelic Zone should be maintained on BBC Two. This would help to raise the profile of the language amongst audiences throughout Scotland and help to attract new audiences to the new Gaelic Service

8. The Cross-party Group for Gaelic would be delighted to work in partnership with the GDS, should relevant opportunities arise.

10. The conditions appear to be appropriate

11. The Cross-party Group strongly urges the BBC Trust to heed the United Kingdom Government's commitment to the European Charter for Regional or Minority Languages (Article 11, 1(a)(ii)) where it has agreed "to encourage and/or facilitate the creation of a Gaelic Television channel."

Scottish Screen

Introduction and Summary

Scottish Screen is the national government-backed agency responsible for developing all aspects of screen industry and culture across Scotland, focusing on the following five priority objectives:

1. **Education** – to ensure that people of all ages and backgrounds are inspired and equipped to analyse, appreciate, explore, create and share screen media;
2. **Enterprise and Skills** - to ensure that there are appropriate levels of skilled individuals and viable companies to sustain all aspects of the screen industries across Scotland;
3. **Inward Investment** - to promote Scotland as a dynamic, competitive and successful screen production hub;
4. **Market Development** - to ensure that the widest range of screen product reaches and is appreciated by a diversity of audiences;
5. **Talent and Creativity** - to identify nurture, develop, support and progress Scotland's screen talent and screen production companies.

Scottish Screen welcomes the opportunity to respond to the BBC Trust's Consultation on the Gaelic Digital Service (GDS) Public Value Test (PVT) provisional conclusions. We do not require our response to be treated as confidential (see Annex).

Scottish Screen supports the establishment of the proposed BBC/GMS Gaelic Digital Service and does not wish to see any further delay to the revised launch date in 2008. Our responses to the specific questions raised by the BBC Trust are given below and are based on four key issues, which we believe to be:

- the importance of the GDS not only to Gaelic speakers but to Scotland as a whole;
- its positive impact on the quality and diversity of broadcasting in Scotland and in the UK;
- the importance of a dedicated Gaelic channel, for language development reasons and to satisfy audience demand; and
- the importance of its being widely and easily accessible by as many viewers as possible

Scottish Screen does have a number of concerns about the proposal as it stands, which we understand are shared by the BBC Trust, namely (1) that the establishment of a “thriving independent sector”¹⁴ of Gaelic programme producers should be regarded as a priority by the BBC; (2) that the statement in the BBC Management's preliminary market impact assessment that fewer than one in ten of the Scottish population will be likely to ever use

¹⁴ BBC Trust, *BBC Management's preliminary market impact assessment for the Gaelic Digital Service*, p.7, 2007, at http://www.bbc.co.uk/bbctrust/assets/files/pdf/consult/gaelic_digital_service/mia_assessment.pdf.

the GDS should be regarded as a challenge, not a given; and (3) that the aspiration to provide some comedy and drama as part of the proposed new service should be given more weight.

However, we do not believe these concerns constitute sufficient reason for the proposal to fail the BBC Trust PVT and see no reason why the Trust should not approve the new service, if the Trust is content that conditions outlined in its report of its provisional conclusions are met.

Our view is that the proposal will generate adequate public value as it stands, supported by the satisfactory Market Impact Assessment conducted by Ofcom and by the fact that the truly incremental costs to the BBC of £2.5 million (excluding distribution costs) are only some 10 per cent of total funding.¹⁵

We agree that the conditions proposed in the draft BBC service licence seem appropriate, with the exception of the condition that launch on DTT should await a review by the Trust by 2010.

1. Do you agree that the BBC Trust is right that more focus is required on the educational aspects of the proposed service and also on how it will achieve a wider appeal in Scotland?

Scottish Screen agrees with the BBC Trust that the educational aspects of the proposed service and its ability to appeal to a wider audience in Scotland are important features.

Indeed, regarding the educational benefits, the GDS is itself a key part of the infrastructure in the National Plan for Gaelic. A partnership with the BBC would not only allow the knowledge and resource transfer to Gaelic in a cost effective way (for example, via the provision of learning resources and future-proofing the online vision), but would also help to create sufficient critical mass to enable the primary language of the Gaelic production sector to shift to Gaelic over time. This would have important beneficial impacts for the Gaelic language.

In terms of appealing to a wider, predominantly English speaking-only audience across Scotland, *Eòrpa*, *Tir is Teanga* and *Rapal TV* are current examples of programmes which appeal to viewers who are not Gaelic speakers and are strong brands across both the bilingual audience and the English-only audience. There will be future opportunities for cross-promotion and content sharing with other BBC channels, such as BBC2 and BBC4, which both broadcast *The Highland Sessions* (broadcast in Gaelic as *Còmhdhail Chòlm Chille*). Programmes focusing on music and sport will also attract wider audiences, as will programmes with an emphasis on Scottish/Highland issues.

¹⁵ “The service would cost £24.8million per annum, of which GMS would contribute £10.1 million and the BBC £14.7 million. The BBC's total funding of £14.7 million consists of £7.2 million already allocated to Gaelic services, £2.5 million for new content and related spend, and just over £5 million for distribution costs.”, BBC Trust, *BBC Trust publishes provisional conclusions on proposals for a Gaelic Digital Service*, 21 November 2007, on the BBC Trust website at http://www.bbc.co.uk/bbctrust/news/press_releases/2007/gds_provisional_conclusions.html .

Optional English subtitling will make all these programmes accessible, as will additional online resources in certain genres. Online support in the form of glossaries and downloadable scripts, for example, will enable learners of Gaelic to watch Gaelic programmes with increasing confidence and understanding.

2. Do you agree with the BBC Trust’s decision that if the additional evidence requested is forthcoming and satisfactory, the Trust can approve the new BBC Gaelic Digital Service, subject to conditions outlined in the Trust’s report of its provisional conclusions?

Scottish Screen does have a number of concerns about the proposal as it stands, which we understand are shared by the BBC Trust. In particular, we believe it is important that:

- the establishment of a “thriving independent sector”¹⁶ of Gaelic programme producers should be regarded as a priority by the BBC;
- the statement in the BBC Management’s preliminary market impact assessment that fewer than one in ten of the Scottish population will be likely to ever use the GDS should be regarded as a challenge, not a given; and
- the aspiration to provide some comedy and drama as part of the proposed new service should be seen as more than an undefined aspiration.

However, we do not believe our concerns constitute sufficient reason for the proposal to fail the BBC Trust PVT and see no reason why the Trust should not approve the new service, if the Trust is content that conditions outlined in its report of its provisional conclusions are met.

3. Do you agree with the statement that if the additional evidence requested is not forthcoming then it is unlikely that the service will create sufficient public value for approval?

Scottish Screen understands that the BBC Trust is independent of the BBC Executive and is required to assess whether the proposal represents adequate public value in relation to the level of proposed investment. We further understand that the approach adopted in the case of the GDS is an incrementalist one, based on the opportunity costs of providing the service – such as the £5 million of additional distribution costs included in the analysis.

While there is some value in examining the results of such an approach to the economic analysis, we would urge the Trust to be mindful that public interventions which are justified on the basis of Public Value differ from those which are based on market failures. The emphasis in Public Value interventions is on citizenship rather than consumer needs. It follows that there needs to be greater emphasis on subjectivity and political judgement rather than economic or legal logic in reaching decisions, for example in determining the extent to which the proposed GDS is consistent with the BBC’s prescribed role in “...[r]epresenting the UK, its nations, regions and communities” and for the Trust’s role

¹⁶ BBC Trust, *BBC Management’s preliminary market impact assessment for the Gaelic Digital Service*, p.7, 2007, at http://www.bbc.co.uk/bbctrust/assets/files/pdf/consult/gaelic_digital_service/mia_assessment.pdf.

“...when setting remits for the BBC ‘to have regard, amongst other things, to the importance of appropriate provision in minority languages’.”¹⁷

Placing too great an emphasis on analytical models which are more appropriate to consumer market analyses has the potential to end up in the absurdity of the recent comments by Jonathan Ross, presumably intended to be jocular, that he is worth 1,000 BBC journalists. In the words of the Trust’s Member for Scotland at a briefing on the Proposed GDS in Glasgow recently, there is a need for rigour, but economic analysis should assist, not be the sole criterion. It is no accident that PSB itself is frequently described as an essential component of the broadcasting ecology; it is a holistic concept, whole swathes of which would fall by the wayside if this incrementalist approach were applied to existing, rather than new BBC services

To the extent that economic benefits need to be considered, however, these benefits should recognise the impact of a partnership with the BBC in allowing the GMS to continue to support the development of the Gaelic independent production sector. Long-term programme planning will not only be beneficial from an editorial perspective, but will also allow independent companies to bid for long-term contracts which, if successfully obtained, will enable them to create sustainable long-term business and development plans. This is especially important as a development route for companies in the Highlands and Islands, which it is expected will also compete for commissions in the English language sector.

So while we would anticipate that the additional evidence requested by the BBC Trust for the new BBC Gaelic Digital Service will be forthcoming and satisfactory, we disagree that this should be a necessary condition for Trust approval. Our view is that the proposal will generate adequate public value as it stands, supported by the satisfactory Market Impact Assessment conducted by Ofcom and by the fact that the truly incremental costs to the BBC of £2.5 million are only some 10 per cent of total funding.¹⁸

4. As an individual, do you believe that a service with the conditions suggested by the Trust would appeal to you either as (a) a Gaelic speaker, (b) a learner of Gaelic or (c) someone with a wider interest in Gaelic or Scottish culture?

N/A

5. Do you believe that the additional incremental spend by the BBC each year of £2.5 million plus distribution costs would create sufficient additional public value to justify this investment?

See 3. above.

¹⁷ BBC Trust, *BBC Trust publishes provisional conclusions on proposals for a Gaelic Digital Service*, 21 November 2007, on the BBC Trust website at http://www.bbc.co.uk/bbctrust/news/press_releases/2007/gds_provisional_conclusions.html .

¹⁸ “The service would cost £24.8million per annum, of which GMS would contribute £10.1 million and the BBC £14.7 million. The BBC's total funding of £14.7 million consists of £7.2 million already allocated to Gaelic services, £2.5 million for new content and related spend, and just over £5 million for distribution costs.”, BBC Trust, *BBC Trust publishes provisional conclusions on proposals for a Gaelic Digital Service*, 21 November 2007, on the BBC Trust website at http://www.bbc.co.uk/bbctrust/news/press_releases/2007/gds_provisional_conclusions.html .

6. If you are a potential user of the service, what means of access (satellite, cable, Freeview, broadband) would be the most convenient to you?

Media consumption patterns are changing. For example, teenagers watch 7 hours a week less television than adults do, and the internet is increasingly powerful in its appeal to users of all ages.

However, Scottish Screen remains convinced that there is a compelling case for a linear television channel with scheduled programmes, and that broadband is best used to support the television channel with programme information, watch-again opportunities and other associated content. Arguments for a linear television channel can be divided into two groups: language related and media related.

From a language perspective, the benefits of a linear channel include the status and standing it will give the language, the positioning and relevance it will create for the language in the public arena, and the fact that it will create one place where viewers know they will find Gaelic content, attracting a loyal following.

From a media perspective, domestic take up of broadband is still only at 45% in Scotland, and in many areas the bandwidth does not, and will not for some time, permit high quality video to be streamed or downloaded. In addition, consumption of media on the internet is essentially solitary and only possible when families have the economic means to do so and are in agreement about sharing resources in the home. Television on the other hand is almost universally available and can be a shared, family experience. While increasingly people will tend to go online for this type of content, for the next few years at least, access to news and information programmes will remain “appointment to view” content for the majority of viewers (i.e. people will tune in at a certain time all over the country to see the latest). In the digital age, specialist channels come into their own and allow for more content creation, better co-ordination of scheduling, longer series, themes and seasons – these are not currently possible with a two-hour slot once a week or a video-on-demand proposition on the internet.

Freeview operates in three commercial and three public service clusters, known as multiplexes, and is currently available to about 73% of the population. After digital switchover, beginning in late 2008 in the Borders, Freeview’s public service multiplexes will be targeted to reach 98.5% of the UK population. Freeview will therefore be the principal means by which the UK population will access free-to-air public service broadcasting.

Currently, there is an acute lack of capacity on Freeview. As a result, the Gaelic Digital Service (GDS) will be available on satellite only from launch and on cable within a month of launch, but will not be available at that time on Freeview (other than what may be carried on TeleG, channel 8).

When digital switchover takes place, the Freeview multiplexes will be reorganised. Switchover will create more capacity on Freeview, but there will also be increasing and competing demands for this capacity.

Ofcom, the industry regulator, recently published a consultation on the Future of Digital Terrestrial Television. The Government's commitment to allocate DTT capacity for broadcasting in minority languages, is discussed in this consultation document.¹⁹ Scottish Screen supports the view that the GDS must be carried on Freeview at the earliest opportunity – that is, on the reorganisation of Freeview, when new capacity will be freed up. Not only will this increase the reach of the GDS, but Freeview will be the means by which the majority of people in Scotland are likely to access free-to-air channels in coming years.

7. Do you believe the withdrawal of the Gaelic zones on BBC Two is an appropriate measure if a Gaelic DTT (Freeview) channel is established?

Yes, Scottish Screen believes that the withdrawal of the Gaelic zones on BBC Two will be an appropriate measure if a Gaelic DTT (Freeview) channel is established. However, it will be of continuing importance to avoid 'ghettoisation' of the service and to facilitate cross-promotion of the GDS.

8. We would be particularly interested in responses from potential educational partners and others involved in the promotion of Gaelic about your views on the possibilities to work in partnership with the GDS.

N/A

9. We would be particularly interested in views from industry respondents about the process for commissioning and the targets proposed by the Trust.

Scottish Screen's view is that the existence of a sustainable independent production sector is vital to the long term health of the sector as whole in Scotland. As stated in 2. above, we believe it is important that the establishment of a "thriving independent sector"²⁰ of Gaelic programme producers should be regarded as a priority by the BBC.

10. Do the conditions proposed in the draft BBC service licence seem appropriate?

We agree that the conditions proposed in the draft BBC service licence^{21, 22} seem appropriate, with the exception of the condition that launch on DTT should await a review by the Trust by 2010 (see 5. above).

¹⁹ Ofcom, *The Future of Digital Terrestrial Television*, 21 November 2008, on the Ofcom website, at <http://www.ofcom.org.uk/consult/condocs/dttfuture/dttfuture.pdf>.

²⁰ BBC Trust, *BBC Management's preliminary market impact assessment for the Gaelic Digital Service*, p.7, 2007, at http://www.bbc.co.uk/bbctrust/assets/files/pdf/consult/gaelic_digital_service/mia_assessment.pdf.

²¹ "In the event of final approval, we are proposing conditions of launch – or, if not a formal condition, that the Trust sets out its view as appropriate – in the following areas:

- The BBC and GMS must have agreed plans to ensure that the user experience when accessing online material held by GMS and the BBC will be a consistent, seamless and high-quality one.
- The BBC and GMS should clarify the area of online rights and the production of any content specifically for online outlets once terms of trade applied to both BBC and GMS funded output are agreed. Specifically, agreements should be flexible enough to adapt to any changes in the commercial online market, and independent producers should be able to compete for commissions for any (non-news) online-specific content.
- The BBC Executive should also ensure that appropriate links and signposts to other Gaelic sites should be made in a fair and non-discriminatory fashion.

11. Are there any other issues you would like the BBC Trust to consider in relation to the proposal?

N/A

-
- The BBC Executive must present clear evidence of how the commissioning strategy will minimise the partnership risk created by the joint venture – for example will the partners commission certain genres (other than news) rather than both commissioning all genres?
 - Clear processes and terms of trade must be in place for how commissioning, particularly from the independent sector, will function and be transparent.
 - There should be confirmation that a Sky EPG listing can be obtained.
 - The funding for the GDS must comply with any applicable requirements set out in clause 75 of the Framework Agreement.
 - The partnership and governance arrangements between the BBC and GMS must be robust and sufficient to ensure the proper stewardship of licence fee payer revenue. Accordingly the service therefore should not launch until:
 - a) the BBC Executive provides fuller details of how the management, financial and accountability controls of the partnership will function with a report from BBC internal audit giving a clear opinion on them; and
 - b) the Controller of Fair Trading has confirmed that the proposal to fund training for independent production companies complies with the BBC's Fair Trading Guidelines.”

BBC Trust, *Gaelic Digital Service: Public Value Test provisional conclusions*, pp. 14-16, 2007, at http://www.bbc.co.uk/bbctrust/assets/files/pdf/consult/gaelic_digital_service/pvt_provisional_conclusions.pdf.

²² “In addition, the following conditions should be covered within any Service Licence for the GDS and also by modifications as appropriate to the BBC Two Service licence:

- Launch on DTT should await a review by the Trust by 2010.
- The future removal of the opt-out from BBC Two is authorised now but also subject to review by 2010.
- The service licence should run for five years. Any renewal of the licence will be subject to approval by the Trust and it will be at the discretion of the Trust to apply a further PVT if necessary, although with the review by 2010 of delivery options this may not be necessary.
- The service licence would only be valid whilst agreed funding is provided by GMS.
- There should be a target of at least 25 per cent of GDS commissions from the independent sector from the second year of operation (Financial Year 2009). The aspiration of at least 50 per cent is endorsed by the Trust, and we will look at progress achieved in working towards this in 2010”;

BBC Trust, *Gaelic Digital Service: Public Value Test provisional conclusions*, pp. 14-16, 2007, at http://www.bbc.co.uk/bbctrust/assets/files/pdf/consult/gaelic_digital_service/pvt_provisional_conclusions.pdf.

Scottish Screen Industry Summit Group

Introduction and Summary

SISG is a cross-industry group which seeks to increase the network presence and international growth of Scotland's screen industries. A brief description of the group's origins and activities is attached as Annex 1.

SISG welcomes the opportunity to respond to the BBC Trust's Consultation on the Gaelic Digital Service (GDS) Public Value Test (PVT) provisional conclusions. We do not require our response to be treated as confidential (see Annex 2).

SISG supports the establishment of the proposed BBC/GMS Gaelic Digital Service and does not wish to see any further delay to the revised launch date in 2008. Our responses to the specific questions raised by the BBC Trust are given below and are based on four key issues, which we believe to be:

- the importance of the GDS not only to Gaelic speakers but to Scotland as a whole;
- its positive impact on the quality and diversity of broadcasting in Scotland and in the UK;
- the importance of a dedicated Gaelic channel, for language development reasons and to satisfy audience demand; and
- the importance of its being widely and easily accessible by as many viewers as possible

SISG does have a number of concerns about the proposal as it stands, which we understand are shared by the BBC Trust, namely (1) that the establishment of a "thriving independent sector"²³ of Gaelic programme producers should be regarded as a priority by the BBC; (2) that the statement in the BBC Management's preliminary market impact assessment that fewer than one in ten of the Scottish population will be likely to ever use the GDS should be regarded as a challenge, not a given; and (3) that the aspiration to provide some comedy and drama as part of the proposed new service should be given more weight.

However, we do not believe these concerns constitute sufficient reason for the proposal to fail the BBC Trust PVT and see no reason why the Trust should not approve the new service, if the Trust is content that conditions outlined in its report of its provisional conclusions are met.

Our view is that the proposal will generate adequate public value as it stands, supported by the satisfactory Market Impact Assessment conducted by Ofcom and by the fact that the truly incremental costs to the BBC of £2.5 million (excluding distribution costs) are only some 10 per cent of total funding.²⁴

²³ BBC Trust, *BBC Management's preliminary market impact assessment for the Gaelic Digital Service*, p.7, 2007, at http://www.bbc.co.uk/bbctrust/assets/files/pdf/consult/gaelic_digital_service/mia_assessment.pdf.

²⁴ "The service would cost £24.8million per annum, of which GMS would contribute £10.1 million and the BBC £14.7 million. The BBC's total funding of £14.7 million consists of £7.2 million already allocated to Gaelic services, £2.5 million for new content and related spend, and just over £5 million for distribution costs.", BBC

We agree that the conditions proposed in the draft BBC service licence seem appropriate, with the exception of the condition that launch on DTT should await a review by the Trust by 2010.

1. Do you agree that the BBC Trust is right that more focus is required on the educational aspects of the proposed service and also on how it will achieve a wider appeal in Scotland?

SISG agrees with the BBC Trust that the educational aspects of the proposed service and its ability to appeal to a wider audience in Scotland are important features.

Indeed, regarding the educational benefits, the GDS is itself a key part of the infrastructure in the National Plan for Gaelic. A partnership with the BBC would not only allow the knowledge and resource transfer to Gaelic in a cost effective way (for example, via the provision of learning resources and future-proofing the online vision), but would also help to create sufficient critical mass to enable the primary language of the Gaelic production sector to shift to Gaelic over time. This would have important beneficial impacts for the Gaelic language.

In terms of appealing to a wider, predominantly English speaking-only audience across Scotland, *Eòrpa*, *Tir is Teanga* and *Rapal TV* are current examples of programmes which appeal to viewers who are not Gaelic speakers and are strong brands across both the bilingual audience and the English-only audience. There will be future opportunities for cross-promotion and content sharing with other BBC channels, such as BBC2 and BBC4, which both broadcast *The Highland Sessions* (broadcast in Gaelic as *Còmhdhail Chòlm Chille*). Programmes focusing on music and sport will also attract wider audiences, as will programmes with an emphasis on Scottish/Highland issues.

Optional English subtitling will make all these programmes accessible, as will additional online resources in certain genres. Online support in the form of glossaries and downloadable scripts, for example, will enable learners of Gaelic to watch Gaelic programmes with increasing confidence and understanding.

2. Do you agree with the BBC Trust's decision that if the additional evidence requested is forthcoming and satisfactory, the Trust can approve the new BBC Gaelic Digital Service, subject to conditions outlined in the Trust's report of its provisional conclusions?

SISG does have a number of concerns about the proposal as it stands, which we understand are shared by the BBC Trust. In particular, we believe it is important that:

- the establishment of a “thriving independent sector”²⁵ of Gaelic programme producers should be regarded as a priority by the BBC;

Trust, *BBC Trust publishes provisional conclusions on proposals for a Gaelic Digital Service*, 21 November 2007, on the BBC Trust website at

http://www.bbc.co.uk/bbctrust/news/press_releases/2007/gds_provisional_conclusions.html .

²⁵ BBC Trust, *BBC Management's preliminary market impact assessment for the Gaelic Digital Service*, p.7, 2007, at http://www.bbc.co.uk/bbctrust/assets/files/pdf/consult/gaelic_digital_service/mia_assessment.pdf .

- the statement in the BBC Management’s preliminary market impact assessment that fewer than one in ten of the Scottish population will be likely to ever use the GDS should be regarded as a challenge, not a given; and
- the aspiration to provide some comedy and drama as part of the proposed new service should be seen as more than an undefined aspiration.

However, we do not believe our concerns constitute sufficient reason for the proposal to fail the BBC Trust PVT and see no reason why the Trust should not approve the new service, if the Trust is content that conditions outlined in its report of its provisional conclusions are met.

3. Do you agree with the statement that if the additional evidence requested is not forthcoming then it is unlikely that the service will create sufficient public value for approval?

SISG understands that the BBC Trust is independent of the BBC Executive and is required to assess whether the proposal represents adequate public value in relation to the level of proposed investment. We further understand that the approach adopted in the case of the GDS is an incrementalist one, based on the opportunity costs of providing the service – such as the £5 million of additional distribution costs included in the analysis.

While there is some value in examining the results of such an approach to the economic analysis, we would urge the Trust to be mindful that public interventions which are justified on the basis of Public Value differ from those which are based on market failures. The emphasis in Public Value interventions is on citizenship rather than consumer needs. It follows that there needs to be greater emphasis on subjectivity and political judgement rather than economic or legal logic in reaching decisions, for example in determining the extent to which the proposed GDS is consistent with the BBC’s prescribed role in “...[r]epresenting the UK, its nations, regions and communities” and for the Trust’s role “...when setting remits for the BBC ‘to have regard, amongst other things, to the importance of appropriate provision in minority languages’.”²⁶

Placing too great an emphasis on analytical models which are more appropriate to consumer market analyses has the potential to end up in the absurdity of the recent comments by Jonathan Ross, presumably intended to be jocular, that he is worth 1,000 BBC journalists. In the words of the Trust’s Member for Scotland at a briefing on the Proposed GDS in Glasgow recently, there is a need for rigour, but economic analysis should assist, not be the sole criterion. It is no accident that PSB itself is frequently described as an essential component of the broadcasting ecology; it is a holistic concept, whole swathes of which would fall by the wayside if this incrementalist approach were applied to existing, rather than new BBC services

²⁶ BBC Trust, *BBC Trust publishes provisional conclusions on proposals for a Gaelic Digital Service*, 21 November 2007, on the BBC Trust website at http://www.bbc.co.uk/bbctrust/news/press_releases/2007/gds_provisional_conclusions.html .

To the extent that economic benefits need to be considered, however, these benefits should recognise the impact of a partnership with the BBC in allowing the GMS to continue to support the development of the Gaelic independent production sector. Long-term programme planning will not only be beneficial from an editorial perspective, but will also allow independent companies to bid for long-term contracts which, if successfully obtained, will enable them to create sustainable long-term business and development plans. This is especially important as a development route for companies in the Highlands and Islands, which it is expected will also compete for commissions in the English language sector.

So while we would anticipate that the additional evidence requested by the BBC Trust for the new BBC Gaelic Digital Service will be forthcoming and satisfactory, we disagree that this should be a necessary condition for Trust approval. Our view is that the proposal will generate adequate public value as it stands, supported by the satisfactory Market Impact Assessment conducted by Ofcom and by the fact that the truly incremental costs to the BBC of £2.5 million are only some 10 per cent of total funding.²⁷

4. As an individual, do you believe that a service with the conditions suggested by the Trust would appeal to you either as (a) a Gaelic speaker, (b) a learner of Gaelic or (c) someone with a wider interest in Gaelic or Scottish culture?

N/A

5. Do you believe that the additional incremental spend by the BBC each year of £2.5 million plus distribution costs would create sufficient additional public value to justify this investment?

See 3. above.

6. If you are a potential user of the service, what means of access (satellite, cable, Freeview, broadband) would be the most convenient to you?

Media consumption patterns are changing. For example, teenagers watch 7 hours a week less television than adults do, and the internet is increasingly powerful in its appeal to users of all ages.

However, SISG remains convinced that there is a compelling case for a linear television channel with scheduled programmes, and that broadband is best used to support the television channel with programme information, watch-again opportunities and other associated content. Arguments for a linear television channel can be divided into two groups: language related and media related.

From a language perspective, the benefits of a linear channel include the status and standing it will give the language, the positioning and relevance it will create for the language in the

²⁷ “The service would cost £24.8million per annum, of which GMS would contribute £10.1 million and the BBC £14.7 million. The BBC's total funding of £14.7 million consists of £7.2 million already allocated to Gaelic services, £2.5 million for new content and related spend, and just over £5 million for distribution costs.”, BBC Trust, *BBC Trust publishes provisional conclusions on proposals for a Gaelic Digital Service*, 21 November 2007, on the BBC Trust website at http://www.bbc.co.uk/bbctrust/news/press_releases/2007/gds_provisional_conclusions.html .

public arena, and the fact that it will create one place where viewers know they will find Gaelic content, attracting a loyal following.

From a media perspective, domestic take up of broadband is still only at 45% in Scotland, and in many areas the bandwidth does not, and will not for some time, permit high quality video to be streamed or downloaded. In addition, consumption of media on the internet is essentially solitary and only possible when families have the economic means to do so and are in agreement about sharing resources in the home. Television on the other hand is almost universally available and can be a shared, family experience. While increasingly people will tend to go online for this type of content, for the next few years at least, access to news and information programmes will remain “appointment to view” content for the majority of viewers (i.e. people will tune in at a certain time all over the country to see the latest). In the digital age, specialist channels come into their own and allow for more content creation, better co-ordination of scheduling, longer series, themes and seasons – these are not currently possible with a two-hour slot once a week or a video-on-demand proposition on the internet.

Freeview operates in three commercial and three public service clusters, known as multiplexes, and is currently available to about 73% of the population. After digital switchover, beginning in late 2008 in the Borders, Freeview’s public service multiplexes will be targeted to reach 98.5% of the UK population. Freeview will therefore be the principal means by which the UK population will access free-to-air public service broadcasting.

Currently, there is an acute lack of capacity on Freeview. As a result, the Gaelic Digital Service (GDS) will be available on satellite only from launch and on cable within a month of launch, but will not be available at that time on Freeview (other than what may be carried on TeleG, channel 8).

When digital switchover takes place, the Freeview multiplexes will be reorganised. Switchover will create more capacity on Freeview, but there will also be increasing and competing demands for this capacity.

Ofcom, the industry regulator, recently published a consultation on the Future of Digital Terrestrial Television. The Government’s commitment to allocate DTT capacity for broadcasting in minority languages, is discussed in this consultation document.²⁸ SISG supports the view that the GDS must be carried on Freeview at the earliest opportunity – that is, on the reorganisation of Freeview, when new capacity will be freed up. Not only will this increase the reach of the GDS, but Freeview will be the means by which the majority of people in Scotland are likely to access free-to-air channels in coming years.

7. Do you believe the withdrawal of the Gaelic zones on BBC Two is an appropriate measure if a Gaelic DTT (Freeview) channel is established?

²⁸ Ofcom, *The Future of Digital Terrestrial Television*, 21 November 2008, on the Ofcom website, at <http://www.ofcom.org.uk/consult/condocs/dttfuture/dttfuture.pdf>.

Yes, SISG believes that the withdrawal of the Gaelic zones on BBC Two will be an appropriate measure if a Gaelic DTT (Freeview) channel is established. However, it will be of continuing importance to avoid ‘ghettoisation’ of the service and to facilitate cross-promotion of the GDS.

8. We would be particularly interested in responses from potential educational partners and others involved in the promotion of Gaelic about your views on the possibilities to work in partnership with the GDS.

N/A (although individual SISG members may well wish to comment individually on this issue).

9. We would be particularly interested in views from industry respondents about the process for commissioning and the targets proposed by the Trust.

Although SISG represents both broadcasters and indies, and has no bias towards either in-house or indie commissions, it does recognise that the existence of a sustainable independent production sector is vital to the long term health of the sector as whole in Scotland. As stated in 2. above, we believe it is important that the establishment of a “thriving independent sector”²⁹ of Gaelic programme producers should be regarded as a priority by the BBC.

10. Do the conditions proposed in the draft BBC service licence seem appropriate?

We agree that the conditions proposed in the draft BBC service licence^{30, 31} seem appropriate, with the exception of the condition that launch on DTT should await a review by the Trust by 2010 (see 5. above).

²⁹ BBC Trust, *BBC Management’s preliminary market impact assessment for the Gaelic Digital Service*, p.7, 2007, at http://www.bbc.co.uk/bbctrust/assets/files/pdf/consult/gaelic_digital_service/mia_assessment.pdf.

³⁰ “In the event of final approval, we are proposing conditions of launch – or, if not a formal condition, that the Trust sets out its view as appropriate – in the following areas:

- The BBC and GMS must have agreed plans to ensure that the user experience when accessing online material held by GMS and the BBC will be a consistent, seamless and high-quality one.
- The BBC and GMS should clarify the area of online rights and the production of any content specifically for online outlets once terms of trade applied to both BBC and GMS funded output are agreed. Specifically, agreements should be flexible enough to adapt to any changes in the commercial online market, and independent producers should be able to compete for commissions for any (non-news) online-specific content.
- The BBC Executive should also ensure that appropriate links and signposts to other Gaelic sites should be made in a fair and non-discriminatory fashion.
- The BBC Executive must present clear evidence of how the commissioning strategy will minimise the partnership risk created by the joint venture – for example will the partners commission certain genres (other than news) rather than both commissioning all genres?
- Clear processes and terms of trade must be in place for how commissioning, particularly from the independent sector, will function and be transparent.
- There should be confirmation that a Sky EPG listing can be obtained.
- The funding for the GDS must comply with any applicable requirements set out in clause 75 of the Framework Agreement.
- The partnership and governance arrangements between the BBC and GMS must be robust and sufficient to ensure the proper stewardship of licence fee payer revenue. Accordingly the service therefore should not launch until:
 - c) the BBC Executive provides fuller details of how the management, financial and accountability controls of the partnership will function with a report from BBC internal audit giving a clear opinion on them; and

11. Are there any other issues you would like the BBC Trust to consider in relation to the proposal?

N/A

Annex I

SISG (Scotland's Screen Industries Summit Group)

SISG is a cross-industry group which seeks to increase network and international presence and growth in production across all areas of the screen industries in Scotland. Industries represented are: television, feature film, animation, advertising and interactive leisure software/computer games.

The current key objectives of the group are that:

- Scotland's share of television network production should increase; we support an increase in the share of network production from the 'three nations' of Scotland, Wales and Northern Ireland to 17%, broadly in line with population;
- Scotland's network commissioning power should be increased significantly;
- in the event that Ofcom and the Government decides to create a new public service publisher (PSP), then the PSP should be located in Scotland;
- significant strengthening of the presence of Channels 4 and 5 in Scotland should take place;
- recording and recognition of R & D within the industries should be improved.

d) the Controller of Fair Trading has confirmed that the proposal to fund training for independent production companies complies with the BBC's Fair Trading Guidelines.”

BBC Trust, *Gaelic Digital Service: Public Value Test provisional conclusions*, pp. 14-16, 2007, at http://www.bbc.co.uk/bbctrust/assets/files/pdf/consult/gaelic_digital_service/pvt_provisional_conclusions.pdf.

³¹ “In addition, the following conditions should be covered within any Service Licence for the GDS and also by modifications as appropriate to the BBC Two Service licence:

- Launch on DTT should await a review by the Trust by 2010.
- The future removal of the opt-out from BBC Two is authorised now but also subject to review by 2010.
- The service licence should run for five years. Any renewal of the licence will be subject to approval by the Trust and it will be at the discretion of the Trust to apply a further PVT if necessary, although with the review by 2010 of delivery options this may not be necessary.
- The service licence would only be valid whilst agreed funding is provided by GMS.
- There should be a target of at least 25 per cent of GDS commissions from the independent sector from the second year of operation (Financial Year 2009). The aspiration of at least 50 per cent is endorsed by the Trust, and we will look at progress achieved in working towards this in 2010”;

BBC Trust, *Gaelic Digital Service: Public Value Test provisional conclusions*, pp. 14-16, 2007, at http://www.bbc.co.uk/bbctrust/assets/files/pdf/consult/gaelic_digital_service/pvt_provisional_conclusions.pdf.

The composition of SISG, which encompasses the broadcasters, the independent production sector and other public organisations and private companies, means that it represents the screen industries at the very highest level in Scotland. Current members are:

- BBC Scotland
- BT Scotland
- Channel 4
- Dave Wightman, Edgies
- Gaelic Media Service
- Glasgow Film Office
- Highlands & Islands Enterprise
- Alan Clements, formerly IWC Media
- Jeff Meek, McCabes
- Allan MacDonald, MnE Television
- Pact
- Scottish Enterprise
- Scottish Screen
- Skillset Scotland & N. Ireland
- Andrew McLennan, Slam Games
- SMG Television
- The Research Centre for Television and Interactivity (TRC)
- Ian McAteer, The Union Advertising Agency.

University of Strathclyde

The University of Strathclyde has, through its Faculty of Education, had a long and close relationship with the Gaelic broadcasting service provided by BBC Scotland. The University's Gaelic lecturers have played leading roles in the work of the Educational Broadcasting Council for Scotland and of Advisory Panels and have acted as consultants for particular programme strands. The University is the main teacher education centre for Gaelic and Gaelic-medium teaching and BBC personnel have provided valuable input to initial teacher education courses on aspects such as resource-based learning and the harnessing of ICT in the learning environment. The engagement between BBC Scotland and the University of Strathclyde has been a mutually beneficial and productive one.

Gaelic staff in the Faculty of Education have acknowledged expertise and experience in the production of courses and resources for learners of Gaelic, both at school level and in the adult education sector. This is evidenced by

- a commission from a consortium of local authorities to produce a progressive, multi-media course for learners of Gaelic in secondary 1-4
- the award of a contract to act as language consultants for the four series Speaking Our Language programmes
- authorship of the Teach Yourself Gaelic course
- compilation of the TY Gaelic dictionary
- production of the forthcoming TY Gaelic conversation pack
- a consultancy role in the BBC Jam resources for Gaelic learners 11-14

The provisional conclusions of the Public Value Test (PVT) stress the need to provide further evidence concerning “strategies to reach beyond the current Gaelic-speaking community to increase the reach of the GDS”. It is worth noting, in this regard, that two of the above products for adult learners have achieved that goal handsomely.

The PVT has to be seen in the context of a much changed landscape and climate for the language in Scotland. Gaelic today enjoys a higher profile and status within Scotland than it has done for centuries. The language was given national priority status by the Scottish Executive in the Standards in Scotland's Schools etc Act 2000 and the first ever official Government agency for the language, Bòrd na Gàidhlig, was created in 2002. The passing of the Gaelic Language Act 2005 sent out a clear message about the then Executive's aspirations for, and commitment to, the language and that was further demonstrated in the adoption of the first National Plan for Gaelic earlier this year. The Gaelic Language Act requires all public agencies in Scotland to produce their own Gaelic Plans and these are required to articulate with the National Plan. A national strategy for Gaelic education forms an integral part of the National Plan.

It is encouraging to see the emphasis given to education in the PVT report. There is a symbiotic relationship between education and broadcasting as, indeed, there is between broadcasting and the arts and between the arts and education and the growth experienced in the education and arts sectors in Gaelic is fed and influenced by the expansion of broadcasting that has taken place in the last ten to fifteen years.

There is strong evidence of burgeoning interest in Gaelic language and culture in areas of Scotland outwith the Gaelic-speaking communities. The city of Glasgow exemplifies that. It can be seen in the rapid growth in Gaelic-Medium education in the city leading to the creation of an all-through 3-18 Gaelic school with over 350 pupils. Strong demand for Gaelic learners classes in community education, increasing uptake of Celtic Studies classes at this University and at Glasgow University and the highly successful and award-winning activities of the Gaelic Arts Agency, An Lòchran, are among the other indicators of this resurgence.

One of An Lòchran's most successful productions was the celebration of the songs of the Gaelic Rock Band, Runrig, which attracted a 2000 capacity audience to the Glasgow Royal Concert Hall and was broadcast subsequently throughout Scotland by BBC Radio nan Gàidheal. Runrig have shown how Gaelic music can range well beyond the confines of the linguistic community in mass audience outdoor events at venues such as Edinburgh Castle, Stirling Castle, Loch Lomond and Loch Ness. The spread and achievements of the Fèisean movement and the ever-increasing participation by Gaelic learners in the Royal National Mod bear further testimony to the capacity of the language and culture to attract non-Gaelic speakers. The coverage given to the Mod by BBC Alba over many years has, for many people, been the trigger for developing an interest in the language and culture.

Scotland has a rich Gaelic heritage and the Gaelic language and culture have played a prominent part in Scottish history and Scottish life. Many of the badges of Scottish identity, including the kilt and the bagpipes, have their origins in Gaelic culture and the language has left an indelible footprint across Scotland in personal names and place names. The Tir is Teanga series is a fine example of how these subjects can be fruitfully exploited by programme makers seeking to interact with a wider Scottish audience. Universities such as Strathclyde would be happy to collaborate with the BBC on these and on a whole range of linguistic, historical and cultural topics designed to engage the widest possible audience.

The use of sub-titles has already shown that quality programmes such as BBC Alba's Eòrpa can attract a non-Gaelic audience and the extension of this practice to programmes focusing on subject matter related to Lowland Scotland, eg Robert Owen and New Lanark, Border Ballads, the River Clyde, Lord Kelvin etc would prove equally effective. The BBC has a long and proud history of involvement in Gaelic broadcasting and has, over the last thirty years, made a very significant contribution to the development of Gaelic education through the provision of impressive radio, television and online resources for schools and adult learners. It is a matter of great regret that the moratorium imposed on the distribution of BBC Jam materials has denied pupils, parents and learners at all stages access to exciting and attractive learning materials, the production of which would not be contemplated by any commercial concern.

Gaelic staff at Strathclyde collect and collate statistics on Gaelic education each session and the figures for the current session show continued growth in all sectors and in all categories. This upward trend is all the more remarkable given that it is set against a backdrop of falling schools rolls. There is clearly an appetite for Gaelic education and for Gaelic provision in the arts and there is no reason to think that this would not be replicated in the field of broadcasting. It is widely recognised that adult learners will play an important part in the

maintenance and development of the language and the advent of a digital service will enhance the Gaelic environment for that constituency affording opportunities to hear the language and to interact with it through the online facility.

The proposed digital service accords with the BBC's public purposes in promoting learning, stimulating creativity and cultural excellence, reflecting the UK's nations, regions and communities and, indeed, in bringing the UK to the world through online and live-streaming facilities and access to the service's website. It is unthinkable that a Gaelic digital service would operate without the BBC as a principal partner. The BBC is a hallmark of quality production for Gaelic speakers and learners and the Gaelic service would be immeasurably impoverished and impaired if the BBC were not to be a lead partner in the enterprise.

Voice of the Listener and Viewer

1. Do you agree that the BBC Trust is right that more focus is required on the educational aspects of the proposed service and also on how it will achieve a wider appeal in Scotland?

Yes.

However, given the extent to which this PVT takes place at an early stage of the application of this test regime, we need to be sure that the requirements are not, or as important, seen to be, disproportionate.

Of course, a wider appeal is necessary - as it would be for, say, Radio 3 if it were to be subject to this same test. There is already, amongst our members and more widely, evidence that Europa provides fresh and innovative programming which achieves and supports the BBC's public purposes for an audience beyond Gaelic speakers per se.

2. Do you agree with the BBC Trust's decision that if the additional evidence requested is forthcoming and satisfactory, the Trust could approve the new BBC Gaelic Digital Service, subject to conditions outlined in the Trust's report of its provisional conclusions?

Yes – please see above

3. Do you agree with the statement that if the additional evidence requested is not forthcoming then it is unlikely that the service will create sufficient public value for approval?

Not entirely.

While we have an expectation that the BBC and the Gaelic Media Service will work together to develop and achieve these strategies and provide the necessary evidence, we also have confidence that BBC Scotland has the managerial skills, commitment and sensitivities to enable this new model of content creation and delivery to be a success.

Given what would be monitoring and management of the developing channel, its content and relationships with a variety of stakeholders and suppliers, such as the independent sector, we see no reason why the service cannot be approved

4. As an individual, do you believe that a service with the conditions suggested by the Trust would appeal to you either as (a) a Gaelic speaker, (b) a learner of Gaelic or (c) someone with a wider interest in Gaelic or Scottish culture?

Yes, although this response is not from an individual but on behalf of viewers and listeners in Scotland and across the UK. However, we see no reason why all three categories should not find the service appealing

5. Do you believe that the additional incremental spend by the BBC each year of £2.5 million plus distribution costs would create sufficient additional public value to justify this investment?

Yes.

6. If you are a potential user of the service, what means of access (satellite, cable, Freeview, broadband) would be the most convenient to you?

VLV members have access to all these delivery platforms but we take the view that platform neutrality should be accompanied by attention to the need to sustain and protect the free-to-air availability of services, including the DTT platform such that it remains viable and that the Freesat proposition be approved and implemented as soon as practicable

7. Do you believe the withdrawal of the Gaelic zones on BBC Two is an appropriate measure if a Gaelic DTT (Freeview) channel is established?

While this seems at first glance a reasonable proposition, there remains an issue regarding marketing and visibility. On air trails for BBC programmes and services already have the potential to annoy parts of the audience.

The removal of Gaelic programming from BBC2 could have the effect of marginalising the provision and requiring on air trails or other forms of expensive marketing to attract non-Gaelic speaking viewers. We believe that the Gaelic strand should remain on analogue television until digital switchover is completed in Scotland in 2010 in order to ensure that all citizens have access to it. After that, there may be a case for either BBC 3 and or 4 taking the programmes.

What is important is that there not become a 'Gaelic ghetto' but that the BBC's commitment to diversity should apply both north and south of the border and that, for example, a suitable position on both the digital spectrum and the electronic programme guide should be achieved.

We note that one of the conditions in the report of the provisional conclusions 3.9 states that 'there must be confirmation that a Sky EPG listing can be obtained.' Although this must be achieved and resolved, it would be unfortunate indeed were the proposal to falter or founder on this requirement and, given the legal and political complexities which might be inherent in achieving it, we suggest that this be removed from the requirements per se or that the listing be confirmed as soon as is practicable.

8. We would be particularly interested in responses from potential educational partners and others involved in the promotion of Gaelic about your views on the possibilities to work in partnership with the GDS.

Not applicable but we suggest that universities such as Edinburgh, Napier or Stirling might be interested.

9. We would be particularly interested in views from industry respondents about the process for commissioning and the targets proposed by the Trust.

Not applicable.

10. Do the conditions proposed in the draft BBC service licence seem appropriate?

No in relation to removing the opt out from BBC Two.

Please also refer to overall response and 11 below, 1 and 3 above.

11. Are there any other issues you would like the BBC Trust to consider in relation to the proposal?

The BBC and the Trust rightly devote time to analysing value for money and the public value test is an important part of this process.

But, as the term public value indicates - it may be that the GDS cost per viewer hour might be defined and determined such that –given the limitations in the size of the potential audience- even allowing for non- Gaelic speakers, a degree of flexibility is built into the measurement such that an allowance enabling a due higher cost becomes acceptable.

We are clear in our agreement with Sir Michael Lyons in his ‘What is the BBC for’ speech to the Royal Television Society that the BBC should in

: "reflecting and strengthening cultural identities"; and "promoting awareness of different cultures and alternative viewpoints" ... build up communities’ sense of themselves.

And, second, strengthen their bonds with other communities.

... diversity both within and between local communities is a source of strength rather than weakness ... the UK will become stronger the more it recognises and builds on that diversity.

The BBC can and should help with this ... people want to see their lives reflected in BBC output – they want to be represented.

At present some people don't think the BBC does a good enough job of this.

For these reasons, we conclude that the BBC Trust should decide that the Gaelic Digital Service should be approved and implemented.