



BBC Scotland

BBC Alba

16 March 2026

Dear Patricia,

Thank you for your email and letter requesting further information.

Allocation of *The Traitors*

The Traitors is produced by an independent production company and the BBC does not hold – nor would we expect to hold – data at the level of detail you have requested. This includes detailed information about staffing, grades, pay, or the Scotland/non-Scotland residency status of individuals working on *The Traitors* or any other production made by independent companies. This is not data we have, and we would not expect to hold this data given it is held by private independent companies. In our *Traitors* economic impact report we estimated the total number of jobs supported in Scotland by the UK and US productions between 2022 and 2025 as 750 – this includes those working directly on the production and in the wider supply chain. We are not in a position to provide any additional information about the versions of *The Traitors* produced for broadcasters in the United States or Ireland because the BBC has no involvement in these productions. They are not funded by the BBC and only appear on BBC iPlayer as part of a licensing agreement.

More broadly, it may be helpful to reiterate the framework within which productions qualify as “Made Outside London”.

Under Ofcom’s guidance, a programme must meet two out of three criteria concerning:

1. A substantive business and production base outside the M25
2. At least 70% of the production spend must be spent in the UK outside the M25
3. At least 50% of the production talent (i.e. not on-screen talent) by cost must have their usual place of employment in the UK outside the M25.

Ofcom has made clear – including in evidence by Ofcom Scotland to the Scottish Parliament’s Culture Committee in May 2025 – that these rules involve nuance and flexibility, reflecting the complexity of the production sector and the need to encourage long-term investment in Scotland. This flexibility is

essential to maintaining a sustainable production ecology and enabling Scottish production companies to grow while also working across the wider UK.

For transparency across the industry, Ofcom publishes the annual Made Outside London programme titles register – the latest one is available [here](#). For each qualifying programme this includes: the nation or region in which it qualified, the criteria met, the production company, and the number of episodes.

To date, all series of *The Traitors* have met the Ofcom criteria for Made Outside London and been allocated to Scotland on the basis of substantive base alone. As we set out in our letter to the Committee in January 2025, *The Traitors* was allocated to Scotland on the substantive base criterion and one of the other two criteria was met out-of-London across the nations and English regions, with the title allocated to Scotland in line with Ofcom’s regulatory position. The proportion of spend across each nation/region is not published. Similarly, no data is published relating to the production budget spent specifically in Scotland or the proportion of staff who were Scotland-based, as all series were allocated under the substantive base criterion rather than spend or staffing.

The wider picture remains consistent: in recent years the BBC has submitted around half of all returns to Ofcom’s Made Outside London register, and around 90% of those BBC titles meet at least two, and often all three, of the qualifying criteria (i.e. not on substantive base alone). According to the most recent Ofcom data (2024) 64 out of 74 BBC titles registered as made in Scotland (87%) met at least two of the criteria.

According to the Made Outside London programme titles register, *Shetland* qualifies on two out of three criteria for production spend with at least 70% spent in Scotland and for off-screen production talent by cost with at least 50% based in Scotland. *Shetland* meets the two spend criteria. The independent production company, Silverprint, part of ITV Studios, does not have a substantive base in Scotland so the title does not qualify on substantive base.

BBC commissioning changes (May 2025)

Looking forward, it may help the Committee to be aware of the changes we announced in May 2025 to our network television commissioning approach. These were introduced to ensure the BBC makes the greatest possible impact across the UK. We are moving beyond the existing Ofcom criteria, and in future, we will not typically commission a new network production regionally or in the devolved nations unless we are confident it will invest at least 70% of its production budget locally and/or draw significantly on local programme-makers and crew.

In Scotland, our goal is to ensure we meet our commitment to spend at least 8% of BBC network TV budgets without relying on productions that qualify via substantive base alone but do not spend a significant proportion of their production or talent budgets in Scotland. This transition will take time due to commissioning cycles of up to three years but is designed to offer long-term benefits for the Scottish production sector.

Charter Review and supporting growth across the UK

Finally, in our response (*A BBC for All*, 5 March 2026) to the UK Government’s Charter Review consultation, we set out the need for a sustainable funding model that allows the BBC to deliver more for audiences across the UK. Our proposals focus on:

1. Supporting economic growth in the nations and regions
2. Increasing the proportion of network spend and senior leadership roles based outside London
3. Strengthening creative clusters across the UK, including Glasgow
4. Moving commissioning and production closer to audiences
5. Ensuring all parts of the UK are authentically and fairly portrayed including increasing the proportion of our spend on portrayal.

Experience shows that targeting BBC spend is the most effective way to sustain long-term growth in creative clusters. However, delivering these ambitions requires flexibility. Under the next Charter we want to see the majority of commissioning roles based across the UK and two-thirds of all network content spend taking place outside London. Achieving this will require both investment and a reformed, sustainable funding model. A Charter Review that simply maintains the status quo risks managed decline and would not allow the BBC to deliver the scale of public value the UK expects.

I hope this additional context is helpful to the Committee. We will liaise with the Committee clerks to agree a date convenient for Members to visit our base at Pacific Quay in Glasgow, and we look forward to welcoming the Committee here.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Hayley Valentine', with a long horizontal flourish extending to the right.

Hayley Valentine
Director, Scotland