Championing
excellence and diversity
in broadcasting
Founded in 1983 by Jocelyn Hay CBE

Voice of the Listener & Viewer

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VLV RESPONSE TO DCMS CONSULTATION

The Future of TV Green Paper

August 2026

INFORMATION ABOUT THE VLV

The Voice of the Listener & Viewer (VLV) is an independent, not for profit membership-based charity, free from political and sectarian affiliations. VLV supports high-quality broadcasting which maintains the democratic and cultural traditions of the UK. We support the independence and integrity of the BBC and encourage work which demonstrates commitment to the principles of Public Service Broadcasting (PSB). VLV is a charitable company limited by guarantee (registered in England and Wales No 4407712 - Charity No 1152136).

Introductory question

Question 1. The green paper covers topics relating to the future of UK television and media. More specifically, it includes content on:

- **the current market and audience context**
- **prominence of news and of public service media**
- **future of TV distribution and regulation**
- **a new system for public service media**
- **media literacy**

What are your overall views on the future of television and media in the UK, related to the topics in this green paper?

Answer: VLV's overall view is that the three main goals the government is pursuing – a healthy information environment, universal access to trusted and high-quality television, and supporting our public service media (PSM) providers – are the right ones. Our concerns relate mainly to whether the government's policy agenda to achieve these goals is ambitious and wide-ranging enough, especially given the severity of the challenges faced by PSM.

The government proposes to achieve its first goal – fostering "a healthy information environment where trustworthy news is easy to find" – principally through a prominence regime for trustworthy news on social media. We discuss that proposal in more detail below. But we also think that a healthy information environment online where people can easily access trustworthy, high-quality journalism will require more measures than the prominence regime proposed. In particular, we think there is need for:

1. A comprehensive ban on all paid political advertising online: in effect transposing across to the internet the current ban that applies to all broadcasting in the UK. The growth of the internet as a platform for political campaigning threatens to enable a *de facto* deregulation of the strict limits that UK law has traditionally put on paid political advertising. One consequence of that traditional system is that, aside from electoral law, there is no regulation of online political advertising – for instance, video ads on Facebook or YouTube – because the Advertising Standards Authority considers political advertising outside of its remit. There is scope for disinformation and misinformation to be spread through online advertising on social media or video sharing platforms, entirely unregulated. Although UK campaign spending limits do limit how much money political parties can spend on political advertising, there are no limits on third parties spending money to raise the salience of issues in online ads that have the effect of benefiting one party over another. This is a serious loophole in media regulation that needs to be addressed before the next election.[1]

[1] See Enders Analysis, *Political advertising in the US and UK: Closing the UK's online loophole [2023-098]*, 18 September 2023

2. Better funding for high-quality journalism: a healthy information environment online requires a healthy news production ecosystem, which in turn requires sustainable funding for high-quality journalism. In 2019, the Cairncross Review highlighted that there was a problem of market failure in the provision of public interest journalism, particularly in local news and investigative journalism, and set out proposals for public funding for public interest journalism.[2] Irrespective of whether the solutions the Review outlined were the right ones, its analysis of the problem – of market failure in the provision of the journalism our democracy needs – has gone unchallenged and is in our view basically correct. Yet successive governments since 2019 have done little to nothing to address the problem. We think the DCMS needs to revisit the question of what interventions could be made to support funding for high-quality journalism online.
3. Fair value for PSM and news and current affairs content providers: one of the – though by no means the only – factors impairing the commercial sustainability of journalism online is the fact that the major search and social media platforms are able to leverage their enormous market power to appropriate an unfairly large share of the value generated by the content that features on their platforms, and which drives engagement, but which they do not fund. It was in partial recognition of this that, especially after the rise of concern over fake news and disinformation online from late 2016 onwards, Google and Facebook gave some small amounts of money to the news industry, but on a temporary basis, and in forms that have since tailed off. Ofcom and the Competition and Markets Authority provided advice to the DCMS back in November 2021 about the application of a code of conduct to regulate the bargaining relationships between platforms and content providers, including news publishers, to try and ensure that there is a fair division of the value generated by the platform distribution of content.[3] But since then little has been done. Should the proposed code of conduct ever be implemented, though, one problem likely to arise is that platforms may algorithmically downgrade news and current affairs content (further – Facebook already has) if regulation for a fair division of value makes it less attractive relative to other content genres. Hence a prominence regime and regulation for fair value have to go hand in hand. More broadly, any prominence regime needs to come with regulatory measures to ensure not only fair value but data sharing and transparency.[4]
4. Greater prominence on social media and video sharing platforms for non-news, factual public service content too: A healthy information environment online, one that contributes to the core public service goal of informed citizenship, requires that prominence on social media and video sharing platforms be given not only to news content but other factual genres too. For example, long form current affairs programmes on YouTube. There are all kinds of factual content that, while not addressed to immediately newsworthy subjects, contribute importantly to citizens possessing a breadth and depth of knowledge also needed for informed citizenship: for example, documentaries covering subjects in science, nature, history, society and culture. Concretely, this might look like greater prominence for, e.g., short, informative science videos on video sharing platforms like YouTube and TikTok.

The government proposes to achieve its second goal – ensuring "audiences can continue to enjoy universal access to trusted and high-quality television content and benefit from our modern digital society more broadly" – principally by managing the DTT to IPTV switchover and introducing a

[2] Department for Culture, Media and Sport, *The Cairncross Review: A sustainable future for journalism*, 12 February 2019
[3] Ofcom and the Competition and Markets Authority, *Platforms and content providers, including news publishers: Advice to DCMS on the application of a code of conduct*, November 2021
[4] See Catherine Johnson et al., *Public Service Media in the Age of Platforms: Challenges and Recommendations for the Future*, September 2025

new system of regulation for 'TV-like' content online. We discuss those issues more below, but here again we think the government's proposals need to be more wide ranging. In particular, the government needs to take action to ensure that television content *remains* 'trusted and high-quality' by shoring up the regulation of television, and by ensuring that the regulatory system itself is, and remains, independent, non-partisan and as insulated as possible from the danger of political capture. In particular, we think the government should introduce:

1. A new system for media appointments, one that is independent of partisan political influence. We propose that the government establish a new system whereby the Public Appointments Commissioner nominates a Media Appointments Panel, in accordance with a set of criteria established in statute, which exclude people who have recently held government positions. The Media Appointments Panel would then take over responsibility for making the appointments to the boards of Ofcom, the BBC and Channel 4 that are currently made by the Secretary of State for Culture, Media and Sport. This follows the model established by Parliament, following the recommendations of the Leveson Report, for the appointment of the independent Press Recognition Panel to oversee the Royal Charter system for monitoring press regulation. Our proposal would go a long way towards reducing the possibility for the political capture of either of our two public broadcasters, or of Ofcom, by the appointment of government figures to board positions. We have seen, particularly during the 2019-24 period, attempts – some successful – to appoint figures closely connected to the governing party to these boards, and we think the possibility of future attempts cannot be ruled out. We agree with the Secretary of State when she said in November last year that political appointments to the BBC's board have "damaged confidence and trust."[5] We also think our proposal would increase public confidence in the independence and integrity of both our public broadcasters and the regulatory system. All would be more empowered to do their jobs with less fear of government interference. If this system was established in statute, it would require for a future government desiring to erode it, the passage of legislation through both Houses of Parliament. Under our unwritten constitution, that is (along with a more independent method of determining Licence Fee funding) the strongest protection we can give to the independence of the leaderships of Ofcom, the BBC and Channel 4 from political interference.
2. A new clause in the broadcasting standards objectives set out in the Communications Act 2003 that prohibits politicians from regularly presenting their own news and current affairs programmes. We argued to Ofcom that this is what the current provisions in the Act entail when it consulted last year on possible changes to the Broadcasting Code that would have prohibited politicians from presenting news in news and current affairs programmes.[6] It is essential to prevent the existence of broadcasters that consistently promote a partisan agenda – something the entire direction of UK media policy over decades has been to prohibit, most obviously by banning political parties holding broadcasting licences.

Between these two reforms, we think the result will be a more robust enforcement of broadcasting standards, particularly as regards impartiality, which will ultimately strengthen confidence in the integrity of broadcasting and the quality of democratic debate.

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[5] *The Guardian*, "Lisa Nandy: BBC review will examine political appointments to board", 14 November 2025

[6] VLV, "VLV response to Ofcom consultation: Politicians presenting news and current affairs programmes", June 2025. See, for example, p. 12, paragraph 22, where we argue that "Broadcasting regulation as a whole in the UK seeks, across a number of rules, to protect the integrity of democratic debate, including by preventing the emergence of partial or partisan broadcasters. If politicians are allowed to present current affairs programmes, the effect of these regulations can to some degree be circumvented. It would be open to a broadcaster to heavily promote an ideological or partisan agenda by creating a number of regular current affairs programmes all presented by politicians from the same political party, or who share a particular political ideology."

The government's third goal – to "support our public service media providers" – in our view requires a number of reforms not considered in the consultation document. Those relating to funding we set out in response to question 2 below. Sitting above those, though, we think the government should establish a new Public Media Commission (PMC) to take over Ofcom's responsibilities for regulating the BBC, monitoring the fulfilment of the overall PSB remit, and evaluating the statements of programme policy produced by the PSBs. In addition, we think the PMC should be given responsibility for recommending to government the future level and form of the Licence Fee, following wide-ranging, participatory, public consultation. The PMC's board could also be appointed by the independent Media Appointments Panel, to protect it from political interference.[7]

If there is going to be a new prominence regime for news content on social media (and potentially other platforms too), and a new regime for regulating TV-like content online, we think it is appropriate that both of these tasks be given to Ofcom. Given: (i) the scale of Ofcom's responsibilities at present, stretching from telecoms and postal services to broadcasting to assessing media mergers to regulating platforms under the Online Safety Act, (ii) the additional scale of responsibilities these new regulatory regimes would entail, and (iii) the likelihood of Ofcom being given the additional responsibility of overseeing the DTT to IPTV transition, we think it makes sense to carve out responsibility for overseeing public service media and give it to another body – one that can give that job the focus it deserves, while allowing Ofcom to focus on being primarily a market regulator, standards monitor and complaints handler.

Market and audience context

Question 2. Chapter one of the green paper describes a series of challenges impacting the UK's TV production ecosystem, including:

- **the spending power of public service media (PSM) providers is decreasing, which impacts their ability to commission new content**
- **the sector faces rising production costs and inflationary pressure, particularly for high-end content like drama**
- **PSM providers are adopting 'fewer, bigger and better' commissioning strategies, often prioritising digital-first content, which has resulted in fewer commissions for some genres**
- **when global streaming platforms commission directly, they typically retain the IP. This inward investment, while filling production expenditure gaps, risks shifting the residual commercial value offshore, creating a challenge for producers to retain IP and long-term economic value**
- **screen-based businesses report unmet finance demand and feel underfunded, despite a high rate of actively using external finance**

What measures do you feel would be most effective for the government to take to overall address these challenges?

[7] VLV, "Culture, Media and Sport Select Committee Inquiry – BBC Royal Charter Review: Response to call for evidence", April 2026, p. 12, paragraphs 50-54

Answer: VLV believes the most effective measures for the government to take to address these challenges are those that increase the funding, and improve the financial security and sustainability, of PSM.

These include:

- **Increasing BBC funding**: principally by reform of the TV Licence Fee to require universal household contribution (with social exemptions) to BBC funding, and greater increases in the level of the Licence Fee than we have seen over the years since 2010, where repeated freezes have (along with falling licence sales and top-slicing) led to real-terms cuts to BBC licence fee income of around 40% since 2010/11.
- **More security and independence for BBC funding**: by establishing a Public Media Commission responsible for (among other things) recommending to government the future level and form of the Licence Fee, after an open and wide-ranging process of public consultation. As well as giving the BBC better protection from politically motivated cuts, it would have more confidence and security about its future funding.
- **A tax on streaming and pay-TV to fund more public service content**: the introduction of a value-added tax on SVOD and pay-TV services to fund the production of public service content in under-provided genres, disbursed by a fund administered by the Public Media Commission, on the model of the BFI's (very successful) Young Audiences Content Fund. We have previously suggested this model could be used to fund children's programming, but the model could be extended to support other under-provided genres, such as arts and specialist factual programming.[8]
- **Review funding options for Channel 4 to reduce its reliance on TV advertising**: TV advertising is a revenue source in long-term structural decline, as the consultation document notes. In our view the government should commission an independent review to consider the options for new sources of funding for Channel 4 that would remain compatible with its universal, free accessibility (i.e. ones other than private subscription).

The effect of the government's proposals to increase prominence for trustworthy news content and for PSM online would be beneficial for PSM providers' ability to maximise the reach of their content. But the added prominence they would be given also makes it essential that they are given more resources with which to provide the volume and quality of content that fully justifies and fully allows them to maximise the social benefits of, that prominence. Likewise, while we agree that PSM providers should do more to promote media literacy, we think they need to be given the added resources to do so, as the Lords Communications and Digital Committee has also concluded, and as we discuss more below.

Prominence of news on social media

Question 3. How often do you encounter news you feel is untrustworthy when online (for example, something you consider to be misinformation)?

Options:

- Never
- Rarely
- Sometimes
- Often
- Very often

[8] See VLV, "VLV Response to CMS Committee: Children's TV Inquiry", September 2025, p. 5-6, paragraphs 13-15

- Not sure

Answer: Very often

Question 4. Do you believe 'trustworthy' news content should be more visible on social media?

Options:
- Yes
- No
- Not sure

Answer: Yes

Question 4a. How would you like this to look in practice, so that audiences can access trustworthy news more easily on social media?

Answer: VLV believes that trustworthy news content should be more prominent on social media, but also on search, video sharing platforms and VOD services, including BVOD services.

There are three principal questions about how a new prominence regime for trustworthy news online would work: they concern: (i) its scope – i.e. what platforms should be included; (ii) the definition of 'trustworthy' news; (iii) the meaning of greater prominence.

The first question is, what should the scope of the prominence regime be? We think that focusing on social media alone is too narrow. Untrustworthy news is not only encountered there but also on video sharing platforms like YouTube and TikTok, and while it may not be encountered on streaming services, that is because they do not provide any news programming at all. Even on BVOD services like iPlayer, news bulletins are not given adequate prominence. In our view, there should be a consistent policy of aiming to increase the prominence of trustworthy news and current affairs content across all online platforms so that, whether they use social media regularly or not, the public are more likely to encounter it online.

The second question is, how should 'trustworthy' news content be defined? In our view, the most obvious criterion for trustworthiness is that the content provider is regulated to high professional and ethical standards. There are two such systems for media standards regulation. The first is Ofcom's regulation of broadcasters in line with the Broadcasting Code. The second is the regulation of news publishers by self-regulators who have been certified by the Press Recognition Panel (PRP) as meeting the criteria for independent, robustness and so on set out in the Royal Charter on Press Regulation.

There are, at present, two self-regulators for news publishers: IMPRESS and IPSO. IMPRESS is certified as Royal Charter-compliant by the PRP. IPSO is not Royal Charter-compliant and has never put itself forward for assessment by the PRP. A number of studies have been published which cast into serious doubt IPSO's effectiveness in upholding the professional and ethical standards which, after the Leveson Report, it was agreed by all major parties in Parliament the press should be held to through the Royal Charter system.[9] The PRP has published three reviews

[9] See, among others, House of Lords Communications and Digital Committee, "Media Standards Trust – written evidence", January 2015 [evidence submitted to an inquiry on press regulation]; The Transparency Project, "Press

of IPSO's performance: two in January and May 2024 and one in May this year.[10] In the most recent review, the PRP found that the May 2026 updated review "*reinforced*" its view "*that IPSO continues to operate a narrow complaints-handling model rather than an effective and independent system of press regulation. Its limited approach to complaints, investigations, remedies and sanctions means it continues to act as a de facto trade body rather than a regulator.*"[11] The Reuters Institute's annual *Digital News Report* includes survey data on "how trustworthy" respondents believe news is from a range of major UK news brands. The results show that three out of the four most distrusted news brands are IPSO-regulated titles (*The Sun*, the *Daily Mail* and the *Daily Mirror*) – the fourth being GB News – with each being distrusted by at least 46% of respondents.[12] What all this shows is that the mere fact that a news outlet is nominally subject to some standards regulation is not in itself a guarantee that it is 'trustworthy'.

We therefore think the suggestion in the consultation document that a "*starting point*" for the definition of a 'trustworthy news provider' "*may be the Recognised News Publisher definition in the Online Safety Act 2023*" is misconceived.[13] That definition requires, as one of its criteria, that publishers are subject merely to "*a standards code*," but with no definition of what constitutes adequate standards or enforcement of those standards. IPSO-regulated publishers are required to adhere to its standards code, but as the evidence cited above shows, IPSO's enforcement of that code is seriously deficient – so much so that, as the PRP puts it, "*IPSO does not provide an effective deterrent against serious or repeated bad behaviour by the press*."

Some regulators and the standards they uphold are clearly more robust than others. The definition of 'Recognised News Publisher' in the Online Safety Act 2023 therefore cannot be the one used by the envisaged prominence regime for trustworthy news content. We instead recommend that the definition be either: regulation by Ofcom under the Broadcasting Code or the Tier 1 Standards Code, or membership of a self-regulator that has been recognised as Royal Charter-compliant by the PRP (e.g. membership of IMPRESS).

In addition, some regulated news outlets have better compliance records than others, with a lower volume of complaints made and upheld against them. For that reason, any prominence regime would need to include differentiation not only between (a) the more and less stringent regulatory

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regulation: why we are unimpressed by IPSO", 17 October 2016; Steven Barnett and Gordon Ramsay, *IPSO: Regulator or Complaints Handler? How UK News Publishers Set Up Their Own Regulator to Avoid Scrutiny*, CAMRI June 2021; Hacked Off, "The Watchdog That Won't Bite: How IPSO Fails to Protect the Public", January 2025; Hacked Off, "Untrusted & unaccountable: another year of failure for the sham press "regulator" IPSO", June 2026.

[10] Press Recognition Panel, "A review of the UK's Independent Press Standards Organisation's complaints process and related issues", 22 January 2024; "IPSO Rulings – a follow up report by the Press Recognition Panel", 8 May 2024; "A review of the UK's Independent Press Standards Organisation's complaints process and related issues: May 2026 update", May 2026

[11] It continues: "*The evidence considered in this report does not show that press harm has abated or that the public is better protected. On the contrary, the overwhelming majority of complaints are filtered out before investigation, while IPSO's strongest sanctions remain unused. Evidence submitted to the PRP shows that press harm continues to affect a wide range of people and communities, including victims of crime, bereaved families, children, and marginalised groups. … IPSO does not provide an effective deterrent against serious or repeated bad behaviour by the press.*" See Press Recognition Panel, "A review of the UK's Independent Press Standards Organisation's complaints process and related issues: May 2026 update", May 2026, p. 3-4, paragraphs 4, 11 and 12.

[12] *Reuters Institute Digital News Report 2026*, p. 71. The percentages of UK respondents who said they "don't trust" those news brands were as follows: GB News – 46%; *Daily Mirror* – 46%; *Daily Mail* – 50%; *The Sun* – 63%. The figures for the public service broadcasters were as follows: BBC News – 24%; ITV News – 15%; Channel 4 News – 15%.

[13] Department for Culture, Media and Sport, *Watch this Space: A new strategic direction for UK media*, June 2026, p. 29

regimes to which different news outlets are held, and (b) outlets with better or worse compliance records; in both cases, the prominence regime should automatically award more prominence to content from the former than the latter. The fact that news content deemed 'trustworthy' is being given greater prominence on platforms ought to at all times be transparent and comprehensible to users. One simple way of achieving this might be to establish a system of clear, simple and transparent kitemarking for content, with links that explain to what regulation the content in question is subject, how to make a complaint, etc.

The third question about a prominence regime for trustworthy news content is whether it gives such content: (a) greater prominence than other, less trustworthy news content – but without altering the relative prominence of news content compared to other content genres on platforms, or (b) more prominence relative to other content genres too. In our view, trustworthy news content should be given both (a) and (b). We set out our reasons below.

The UK's public service broadcasting system has sought, since its inception, to ensure that the British public is regularly exposed to high-quality news and current affairs programming, in order to promote the kind of informed citizenship necessary to sustain a democratic society. That aim is pursued in present law and regulation in a number of ways, including:

- The public service remit for television in the UK set out in section 264 of the Communications Act 2003 includes the requirement, "that the audiovisual content made available by the public service broadcasters (taken together) provides, *to the extent that is appropriate for facilitating civic understanding and fair and well-informed debate on news and current affairs*, a comprehensive and authoritative coverage of news and current affairs— (i) in, and in the different parts of, the United Kingdom, and (ii) from around the world" (our italics).[14]
- The BBC's first public purpose is to "provide impartial news and information" so that "all audiences can engage fully with major local, regional, national, United Kingdom and global issues and *participate in the democratic process, at all levels, as active and informed citizens*" (our italics).[15]
- Channel 4's media content duties, as set out in section 198A of the Communications Act 2003 (as amended), include (a) that it must participate in "the making of relevant media content that consists of news and current affairs", (b) that in so doing it must "promote measures intended to secure that *people are well-informed and motivated to participate in society in a variety of ways*", and (c) that in so doing it must "support and stimulate *well-informed debate* on a wide range of issues, including by providing access to information and views from around the world and by challenging established views" (our italics).[16]
- The public interest grounds on which the Secretary of State can intervene in media mergers, set out in section 58 of the Enterprise Act 2002, include the need for a "sufficient plurality of views" and "sufficient plurality of persons with control of the media enterprises" serving every different audience in the UK.[17] These grounds have been interpreted by Ofcom, for example in its 2015 *Measurement framework for media plurality*, as important because plurality "contributes to a well-functioning democratic society" through "*informed citizens* who are able to access and consume a wide range of viewpoints across TV, radio, online and print media from a variety of media organisations" (our italics).[18]

[14] Communications Act 2003, section 264, subsection (5)(a)
[15] BBC, "Mission, values and public purposes"
[16] Communications Act 2003, section 198A, subsections (2)(a), (3)(a) and (4)(b) respectively.
[17] Enterprise Act 2002, section 58, subsections (2B) and (2C)(a)
[18] Ofcom, *Measurement framework for media plurality*, 5 November 2015

One of the most obvious ways in which public service broadcasting sought to achieve the aim of informed citizens was by ensuring that news and current affairs programmes were scheduled at peak viewing times (e.g. 6pm and 9/10pm) and simultaneously across BBC One and ITV One, to give news prominence *and* reduce the alternatives to viewing a news programme at that time. (The BBC and ITV likewise used often to schedule their current affairs programmes at the same times – e.g. *Panorama* and *World in Action* on Mondays at 8pm – for the same reason.) In other words, the PSB system gave news and current affairs programmes considerable prominence in the linear TV schedule *and* sought to restrict viewers' non-news alternatives at those times, in order to maximise audiences for news.

Today, the high-choice nature of on-demand viewing makes it effectively impossible to restrict viewer choice in the same manner. Increasing viewer choice has been experimentally shown to reduce the audience for news and current affairs programming, because, given non-news alternatives, a section of the TV audience will always choose those alternatives. In his 2007 study *Post-Broadcast Democracy*, Markus Prior conducted a survey experiment in which two groups of US respondents were given two different sets of choices. The first, 'low-choice' set was given the choice either of watching a network news programme (i.e. one of either ABC Nightly News, NBC Nightly News, CBS Nightly News, or the *Newshour with Jim Lehrer*), or not watching TV at all. The second, 'high-choice' set was given the choices of watching a network news programme, a cable news programme (i.e. Fox News, CNN or MSNBC), or one of several entertainment options (i.e. "a comedy or sitcom program like *Friends* or *The Simpsons*", "a drama program like *ER* or *Law and Order*", "a science fiction program like *X-Files* or *Star Trek Voyager*," "a Reality TV [programme] like *Survivor* or *Cops*," or "a Sports program"). The low-choice set had five options: four news options and no TV; the high-choice set had eleven options of which five were news, five were entertainment, and one was no TV. What Prior found was that in the low-choice group, 79.9% of respondents chose a news programme and 20.1% chose no TV. In the high-choice group, 35.4% choice a network news programme, 8% chose a cable news programme (for a total of 43.4% in total choosing news), 47.5% chose an entertainment programme, and 9.2% chose no TV. So, while increasing the choice of entertainment alternatives to news reduced the number of people who would not watch TV, it nearly halved the percentage of respondents who chose to watch news programmes.[19]

There is therefore good reason to think that the explosion in media choice over the past four decades has played a major role in the substantial decline in audiences for news and current affairs programmes. It is likely this has contributed to fewer news and current affairs programmes being made, less investment in journalism by broadcasters, and systemic pressure to try and make what remains less serious and more entertaining – in order to compete with other, more inherently entertaining programme genres (e.g. entertainment, drama, reality TV, sport), possibly leading to a lower proportion of 'hard news' and higher proportion of 'soft news' stories, and with more 'horse race' political coverage and less substantive analysis of issues. It is worth noting in this connection that none of the major SVOD services – Netflix, Amazon Prime Video, Disney+, Apple TV+, HBO Max, Paramount+ – produces any news programming whatsoever. Ofcom's most recent Media Nations report found that a quarter of UK viewers (26%) say Netflix is their first choice when looking for something to watch, with the BBC second at 25% and ITV third at

[19] Markus Prior, *Post-Broadcast Democracy* (Princeton University Press 2007), p. 35. Although it would be very simple to replicate Prior's survey experiment with UK audiences, to our knowledge no such survey has ever been conducted, whether by Ofcom, as part of the survey for its annual news consumption report, or by academic researchers.

15%.[20] Yet Netflix's platform contains no news programming, and very minimal current affairs programming.

Viewers have a range of reasons for choosing non-news programmes over news besides a preference for entertainment, including low trust in the news media or low interest in news and current affairs subjects, but the downstream consequences of those choices being made on an increasingly large scale are, ultimately, lower levels of civic knowledge and political participation. In addition, inequalities in news consumption have been shown to be correlated with other social inequalities – in particular, class inequality.[21] There is now a well-documented, serious and growing problem of 'news avoidance', which, at its most extreme, sees people disengaging from any regular news consumption whatsoever.[22] News avoidance is still an issue largely unacknowledged in media policy. While Ofcom's 2025 report *News consumption in the UK* noted that "news and current affairs as a topic of interest has been decreasing over time, declining from 48% in 2018 to 42% in 2025," it made no reference to the problem of news avoidance or the research literature on it.[23] To our knowledge, despite its extensive research work on media use and audience attitudes, Ofcom has never published any qualitative or quantitative study of news avoidance, or of inequalities in news consumption across the population, despite its statutory obligation to promote media literacy. Interest in news and current affairs has been shown to be, in part, a product of prior exposure to news and current affairs content. It stands to reason, then, that declining exposure is leading, over time, to declining interest – further compounding the viewing decline. Yet we largely lack the research evidence base needed to understand the precise dimensions of this problem in the UK.

The policy solution is in one sense straightforward: news and current affairs content from trustworthy providers should be given additional prominence on search, social media and video sharing platforms, so that users are more frequently exposed to it – even if only in passing, on their way to finding other content. The most obvious way of doing this is to regulate the platforms requiring them to ensure that trustworthy news content is given prominence on the home or landing pages of their websites and apps, is awarded extra prominence by their algorithms, and is given its own tab in their apps where users can access more of it. Users should have the option of turning off this extra prominence, however, the default setting should be that prominence of trustworthy news is switched on, so that users are required to opt out, rather than opt in. This is evidenced by research which demonstrates that 'opt-out defaults lead to significantly greater uptake of the pre-selected decision than opt-in defaults'.[24]

The effect of this prominence regime for trustworthy news on platforms would be to increase the UK public's exposure to news content from trustworthy news outlets and decrease their exposure to untrustworthy news content. Inevitably, to what degree it would achieve this is unknowable in advance and would require empirical research to establish. But the prominence regime we have proposed would also be likely to have beneficial effects on news outlets, by incentivising them to (a) join a PRP-recognised news regulator if they aren't already subject to one, (b) maintain a good

[20] Ofcom, *Media Nations: UK 2026*, 29 July 2026, p. 40
[21] Antonis Kalogeropoulos and Rasmus Kleis Nielsen, "Social Inequalities in News Consumption", Reuters Institute Factsheet October 2018
[22] Ruth Palmer, Benjamin Toff and Rasmus Kleis Nielsen, *Avoiding the News: Reluctant Audiences for Journalism* (Columbia University Press 2023)
[23] Ofcom, *News Consumption in the UK: 2025 – Research Findings*, 21 July 2025, p. 7
[24] Jachimowicz, Jon M; Duncan, Shannon; Weber, Elke U; Johnson, Eric J, (2019), When and why defaults influence decisions: a meta-analysis of default effects, *Behavioural Public Policy*, 3(2), p.162; Madrian, Brigitte C. and Shea, Dennis F. (2001) The Power of Suggestions: inertia in 401(k) Participation and Savings Behavior, *The Quarterly Journal of Economics*, 116(4), p.1149-50.

compliance record, and (c) produce more hard news output. The effect of the prominence regime on user engagement with the platforms that are subject to it may well be to lower that engagement somewhat *overall*, but if consumption of trustworthy news is still increased, that – while perhaps unfortunate for the platform companies – should be of little consequence for UK public policy.

Question 5. If the government gives prominence to trustworthy providers of news (meaning by making them more visible online), should this prominence be ongoing, and 'always on,' or only active during periods of crisis?

Options:
- Ongoing and 'always on'
- Only during periods of heightened vulnerability
- Not sure

Answer: Ongoing and 'always on'

Question 6. Do you feel individual users should be given an option in whether prominence measures for trustworthy news content are switched on or off for them?

Options:
- Yes - users should be given an option in whether prominence measures are switched on or off for them
- No - users should not be given an option in whether prominence measures are switched on or off for them
- Not sure

Answer: Yes - users should be given an option in whether prominence measures are switched on or off for them.
However, the default setting should be that prominence of trustworthy news is switched on.

Media literacy duty and joint venture

Question 7. How concerned, if at all, are you about the impact of misleading or unreliable information on society?

Options:
- Very concerned
- Somewhat concerned
- Not very concerned
- Not at all concerned
- Not sure

Answer: Very concerned

Question 8. How concerned, if at all, are you about the impact of misleading or unreliable information on democracy?

Options:

- Very concerned
- Somewhat concerned
- Not very concerned
- Not at all concerned
- Not sure

Answer: Very concerned

Question 9. Public service media refers to organisations such as the BBC, ITV, Channel 4 and S4C.Which of the following statements most closely reflects your view on the role of public service media in helping people critically engage with news and other information they encounter online or offline? (select only one)

Options:
- Public service media has a role in supporting critical engagement, and is currently doing enough
- Public service media has a role in supporting critical engagement, and should do more
- Public service media does not have a role in supporting critical engagement
- Public service media is currently doing too much to support critical engagement, and should do less
- Not sure

Answer: Public service media has a role in supporting critical engagement, and should do more

Question 10. How important, if at all, do you think it is for people to be able to judge the accuracy and reliability of information they encounter, for example online or in the news?

Options:
- Very important
- Somewhat important
- Not very important
- Not at all important
- Not sure

Answer: Very important

Question 11. How valuable, if at all, do you believe collaboration between public service media, civil society organisations (for example charities and education groups), and the media sector could be in supporting people to critically assess information?

Options:
- Very valuable
- Somewhat valuable
- Not very valuable
- Not at all valuable
- Not sure

Answer: Very valuable

Question 12. Which of the following models, if any, do you consider most effective for further media sector collaboration in this area?

Options: (select all that apply)

- Informal coordination and sharing of learning
- A structured forum with agreed objectives and reporting
- Joint delivery of public-facing initiatives
- No additional collaboration is needed
- Not sure

Answer: all of bullet points 1-3.

Question 12a. Please provide any supporting evidence as to why you think the model(s) you selected are effective for collaboration between public service media and the media sector.

Answer: VLV believes that all three of the models outlined will be necessary to promote media literacy, and none excludes any of the others. We also believe that all of PSM, civil society organisations and the wider media sector have a role to play. Civil society organisations are particularly important for their ability to hold government and PSM to account.

We believe that media literacy is a shared responsibility across the media ecosystem, and online platforms should also play a proportionate role in supporting it, recognising the scale of their operations and the significant influence they have over the information audiences encounter and how it is discovered and recommended. This should include sustained investment in media literacy initiatives, alongside greater transparency about the systems and processes that determine how content is surfaced and accessed.

We also note that the Green Paper appears to envisage new media literacy obligations being linked to enhanced prominence. At the same time, it proposes extending the benefits associated with prominence to a broader range of "trustworthy news providers". If this approach is taken forward, it would be appropriate for the corresponding responsibilities to apply consistently to all organisations benefiting from the regime, rather than placing those obligations on PSM providers alone.

We are also concerned that, while questions 11 and 12 ask about collaboration between a range of stakeholders, none of them mention the role of the government itself, government departments, public services or local authorities: yet it is the government which must take the lead in ensuring a comprehensive, joined-up media literacy programme is delivered, including by providing a structured forum with agreed objectives and reporting, ensuring joint delivery of public-facing initiatives, and encouraging informal coordination and sharing of learning between stakeholders.

This was one of the key conclusions of the House of Lords Communications and Digital Committee's 2025 report on *Media literacy*: "*As the independent regulator, Ofcom is not the appropriate body to coordinate or deliver a nationwide media literacy programme. Only the Government can do this. To date, the Government has failed to fill this leadership vacuum. The Government must provide a clearer overall direction for media literacy work across Whitehall and translate Ofcom's media literacy strategy into action. It must coordinate the work across*

education, public services and local government that is essential to deliver a comprehensive media literacy programme. This requires the nomination of a specific, senior minister to take responsibility for media literacy across government departments and to establish clearer lines of accountability on this issue to Parliament."[25]

At the same time, we think it is crucial that the government recognises that, however much co-ordination and collaboration there is between government and stakeholders, there is only so much that can be done on present resources. In particular, it is fine to ask PSM to do more – for instance by giving them a statutory duty to promote media literacy and report on the initiatives they are taking – but they must be given the resources to do more. Again, as the Lords Committee report concluded, "*public service broadcasters make a significant contribution to media literacy through their provision of trusted and accurate news. The BBC's current work to support media literacy through its educational resources is useful, but we note that limited resource restricts its reach.*"[26] The report also concluded that, "*at a time of great financial challenges for both media organisations and government, we believe that the funding for large scale media literacy programmes should substantially come from the technology sector.*"[27]

Future of TV distribution

Question 13. Chapter 3.1 of the green paper outlines the government's preference for an IPTV transition from either 2034 or 2044. The following questions seek views and evidence relating to this proposal.

To what extent do you agree or disagree with the government's assessment of the case for change relating to the future of digital terrestrial television?

- Strongly agree - audiences should definitely adopt Internet Protocol Television (IPTV) and similar technologies
- Agree - audiences should adopt IPTV and similar technologies
- Neither agree nor disagree - no strong opinion either way
- Disagree - audiences should not adopt IPTV and similar technologies
- Strongly disagree - audiences should definitely not adopt IPTV and similar technologies
- Not sure

Answer: Agree - audiences should adopt IPTV and similar technologies

Question 13a. Please provide further rationale for your answer and any relevant evidence.

Answer: In VLV's view, the case for change from DTT to IPTV is valid. The question is simply whether the conditions for a just and inclusive transition can be met by 2034. While we are in favour of the transition, it must not come at the expense of television's universal accessibility: there is a case for change, but not change at any cost.

[25] House of Lords Communications and Digital Committee, *Media literacy – 3rd Report of Session 2024-25*, 25 July 2025, p. 24, paragraphs 64-5
[26] House of Lords Communications and Digital Committee, Media literacy – 3rd Report of Session 2024-25, p. 46, paragraph 146
[27] House of Lords Communications and Digital Committee, Media literacy – 3rd Report of Session 2024-25, p. 37, paragraph 113

Question 14. The green paper outlines two timing options for digital terrestrial television (DTT) switch-off. These are 31 December 2034 (option 1 at Annex A) and 31 December 2044 (option 2 at Annex A).

Which option do you prefer as timing for DTT switch-off?

Options:

- Strongly prefer 2034
- Somewhat prefer 2034
- No strong opinion either way
- Somewhat prefer 2044
- Strongly prefer 2044
- Neither 2034 or 2044
- Not sure

Answer: Somewhat prefer 2034

Question 14a. Please provide further rationale for your answer and any relevant evidence.

Answer: In VLV's view, the 2034 date is preferable over 2044, not least because it will allow UK broadcasters to realise valuable cost savings that can be invested in programming instead. But it is *only* preferable *if* a set of conditions are met which ensure switchover does not leave anyone excluded from the new IPTV distribution system. Those conditions are likely to include:

1. A clearly defined timetable for when key prerequisites need to be delivered by in the run-up to switchover, and clarity over who is responsible for delivering them.
2. A set of standards is agreed between broadcasters, streamers, platforms and device manufacturers for the interfaces users are presented with, maximally similar to current DTT ones.
3. All UK broadband users able to access internet connections at speeds adequate to receive IPTV, with adequate protection of broadband infrastructure and contingency plans to deal with events, both small- and large-scale, that could cause outages.
4. Requirements for reliable service from ISPs at levels equivalent to DTT and clear lines of responsibility and complaints processes for audiences when something goes wrong.
5. A range of measures in place to ensure that all UK households can, regardless of income, access broadband services adequate to receive IPTV. In other words, not just universal *availability* of adequate broadband, but all households actually having adequate broadband connections, at prices they can afford. This will inevitably require concessions and support for low-income households.
6. A major public information campaign, which will likely need to be funded by government, to advertise and explain the switchover to the public, along with targeted digital literacy programmes to help all groups identified as at risk of lacking the digital skills needed to use the new system, and a kitemark agreed with device manufacturers for TV sets that are switchover compliant.

In our view, there are three major potential causes of exclusion after switchover: broadband unaffordability, digital illiteracy, and inaccessibility. The government and industry must have an agreed plan to adequately deal with all of these in place *well in advance* of the switchover date. Otherwise, the switchover should be postponed to 2044. In our view, given the conditions above, the government must not assume that the switchover can be achieved for free, and must

recognise that achieving the switchover by 2034 is likely to cost public money – particularly for the public information and digital literacy programmes necessary. It is also important to recognise that affordability and digital skills are likely to be ongoing issues requiring ongoing support well beyond the switchover date.

Question 15. Do you have evidence that another timeframe is preferable to the ones specified in this consultation? If so, please provide further details.

Answer: N/A

Question 15a. For industry/organisations only: To deliver an IPTV transition would require collaborative working with audience groups, industry and across government. Please outline your organisation's commitment to supporting this work, including relevant experience, resources, and innovative solutions as to how you would deliver this transition.

Answer: VLV has joined a group of organisations, convened by the charity Wavelength, committed to working together to coordinate a response to the proposed DTT switch off and migration to online services, with the aim of supporting viewers who, for various reasons, may find this process difficult. The group includes, inter alia, the Digital TV Group, Ofcom, PSBs, TechUK, relevant manufacturers and NGOs.

Question 16. To what extent do you agree or disagree that the challenges identified in the green paper (delivering for all audiences; maintaining a reliable television service; promoting competition and innovation in the television industry and supporting a sustainable future for PSM providers) capture all of the considerations when making a decision on whether, and how best, to support audiences to adopt IPTV and other similar technologies?

- Strongly agree - the challenges comprehensively capture all of the considerations when making a decision on whether, and how best, to support audiences to adopt IPTV and other similar technologies
- Agree - the challenges capture all of the considerations
- Neither agree nor disagree - no strong opinion either way
- Disagree - the challenges do not capture all of the considerations
- Strongly disagree - the challenges definitely do not capture all of the considerations
- Not sure

Answer: Disagree - the challenges do not capture all of the considerations

Question 16a. Please provide further rationale for your answer.

Answer: One important consequence of the DTT to IPTV switchover that goes unmentioned in the consultation document is that it will make even more challenging TV Licensing's job of enforcing the current TV Licence obligation on households.

At the moment, TV Licensing must prove unlicensed access to licensed content in order to take unlicensed households to court for evasion. Traditionally, it has been possible for TV Licensing to acquire this proof without needing to gain access to the premises by observing a TV aerial on the roof of the premises, which lowers the cost of enforcement and contributes to the efficiency of the

TV Licence system. The increasing use of the internet to access licensable content (e.g. via iPlayer) has contributed to a problem of rising evasion because it has enabled households to do away with a TV aerial while still accessing licensable content, making evasion harder to detect externally.

The DTT to IPTV switchover would compound this enforcement problem considerably because possession of a TV aerial would no longer externally indicate anything to TV Licensing about media use. We therefore think it would make little sense to plan for a DTT to IPTV switchover in 2034 without first severing the connection between device use and the obligation to pay the Licence Fee. Otherwise the job of enforcing the TV Licence obligation is likely to get significantly more challenging, potentially leading to a major rise in evasion and requiring much greater, more invasive and more costly enforcement by TV Licensing.

Question 17. In your opinion, which, if any, of the challenges are most important to you? Please rank in order of importance, where 1 is the most important to you.

Options:

- Delivering for all audiences - Any transition to IPTV and other similar technologies must preserve universal access to TV, including public service media providers, regardless of income, location, age, or digital confidence.
- Maintaining a reliable television service - The ability to communicate to the public in a national emergency must be retained beyond a move to IPTV. Before digital terrestrial television is switched off, industry must show that alternative technologies can deliver comparable or better standards of reliability, resilience, and coverage.
- Promoting competition and innovation in the TV industry - A managed transition to IPTV and other similar technologies offers an opportunity to modernise TV delivery, the transition should free up resources and spectrum, and allow broadcasters to focus on content and innovation rather than maintaining parallel legacy systems.
- Supporting a sustainable future for public service media providers - public service media providers play a central role in the UK's cultural, civic, and democratic life. Industry must ensure that new distribution models support, rather than undermine, public service media providers' ability to play this role.

Answer:

1. Delivering for all audiences - Any transition to IPTV and other similar technologies must preserve universal access to TV, including public service media providers, regardless of income, location, age, or digital confidence.
2. Supporting a sustainable future for public service media providers - public service media providers play a central role in the UK's cultural, civic, and democratic life. Industry must ensure that new distribution models support, rather than undermine, public service media providers' ability to play this role.
3. Maintaining a reliable television service - The ability to communicate to the public in a national emergency must be retained beyond a move to IPTV. Before digital terrestrial television is switched off, industry must show that alternative technologies can deliver comparable or better standards of reliability, resilience, and coverage.
4. Promoting competition and innovation in the TV industry - A managed transition to IPTV and other similar technologies offers an opportunity to modernise TV delivery, the transition should free up resources and spectrum, and allow broadcasters to focus on content and innovation rather than maintaining parallel legacy systems.

Question 18. In the event of an IPTV transition, which of the following, if any, do you think are the most important to ensure everyone can still access television from their own home? Please rank in order of importance, where 1 is the most important to you.

Options:

- Affordable broadband for all, suitable for television viewing
- Low-cost or subsidised broadband for people receiving benefits or on low incomes
- Low-cost or discounted internet capable television sets for people on low incomes
- Simple devices that connect older television sets to the internet with no ongoing fees
- Services and systems that feel the same as digital terrestrial television so they are easy to use for people with limited digital skills
- Built-in, easy to use accessibility features for disabled users, for example subtitles and audio description
- Digital skills required to navigate or set up IPTV

Answer: VLV believes all of the above measures are essential for the switchover to IPTV to be a success and therefore see it as misconceived to ask respondents to rank them.

Question 19. What are the likely environmental impacts associated with both a 2034 transition and 2044 DTT switch-off (transition to IPTV)?

In your response, please provide evidence where possible on:

- The comparative energy use and carbon emissions of different distribution technologies.
- The environmental implications of changes in viewing behaviour (for example, increased streaming or on-demand consumption)
- The lifecycle environmental impacts of relevant infrastructure and consumer equipment (such as transmitters, network infrastructure, set-top boxes, and connected televisions)
- Opportunities to improve the environmental sustainability of television distribution, including through technological innovation, infrastructure efficiency, or consumer behaviour
- Any risks that policy decisions on the future of TV distribution could unintentionally increase environmental impacts
- Please include any available data, modelling, or research that could inform the government's assessment of environmental impacts.

Answer: Modelling the environmental impacts of a 2034 or 2044 transition is challenging because the rate of change is uncertain and publicly available data on the impact of IPTV and DTT is limited, particularly for devices in the home and embodied carbon. Better data needs to be made available by service providers and device manufacturers for independent assessments to be made in this area.[28]

However, we can say that maintaining a hybrid system – both DTT and IPTV – continues carbon emissions from both distribution systems. Transition in 2034 would move the UK to one transmission mechanism (IPTV) sooner, eliminating this impact. A transition that prioritised energy efficiency standards in IPTV development would help to limit the environmental impacts. This could include requiring greater backward compatibility in software updates to limit the frequency with which people have to upgrade hardware (e.g. smart TV sets and other connected

[28] *Future of TV Distribution: A report prepared by the University of Exeter with the University of Leeds, MTM, 3 Reasons and Real Wireless*, 7 September 2024

devices). This would have broader financial benefits, particularly for those households on lower incomes.

Question 20. Is there anything else you would like to add regarding the future of TV distribution that has not already been captured?

Answer: AWG research into internet access and speeds argued that the broadband Universal Service Obligation is unlikely to provide sufficient guarantees for audiences in the case of an IPTV transition. The current definition of a 'decent' affordable connection is defined in legislation as a download speed of at least 10 Mbps, below the threshold used by government for multiple reliable HD streams, currently set at 30 Mbps. DTT is also currently obliged to meet reliability standards that IPTV is not currently held to. Targeted intervention will likely need to be applied to both service uptime (or equivalent) and hardware performance for broadband providers. The IPTV distribution chain is also more complex than DTT, making it harder for audiences to know who to contact when TV services are disrupted (e.g. is the fault in the receiving equipment, broadband or other). Clear lines of responsibility and easy access to fast and efficient customer service from manufacturers and ISPs would be required so that audiences know who to contact when facing issues with IPTV, with service and response time guarantees.[29]

Future of TV regulation

Question 21. Chapter 3.2 of the green paper sets out some of the challenges regarding the future of TV regulation, such as which TV-like services should be regulated going forward, and to what standard. Is there any information or comment you would like to provide in relation to the future of TV regulation?

Answer: VLV would be happy to discuss the future regulation of TV-like content and services going forward. Below we outline some principles we believe should inform the government's approach.

1. Whatever regulatory standards are decided, the same standards should apply to video and audio content: VLV believes that, just as broadcast content is held to the same Code across TV and radio, any future regulation of 'TV-like' video content and services ought also to cover 'radio-like' audio content and services. It makes all the more sense to do so given the porous boundary between video and audio content online: there are, for example, audio podcasts available as YouTube videos, and YouTube videos available as audio podcasts. The most popular podcast in the UK at the moment, for example – The Joe Rogan Experience – is available as both, as many podcasts are to maximise their reach.
2. Most UK broadcasting standards, except impartiality requirements, should apply to online content that is similar enough to broadcast content: 'TV-like' and 'radio-like' online video and audio content should be held to the same standards as UK broadcast content, with the exceptions of (i) the impartiality rules, and (ii) the special impartiality requirements applied during elections and referendums. To impose these on online video and audio content would, we think, be an undue limitation on freedom of expression online, and also most likely unenforceable anyway.

[29] Department for Culture, Media and Sport, "Stakeholder Forum Papers: Audience - Audience impacts in future of TV distribution", see especially section 5, "Full IPTV transition"

3. There is need to differentiate among online content, but on a clear, comprehensible and transparent basis: not all online video content is 'TV-like' and not all online audio content is 'radio-like', in the sense of deserving to be held to the same standards as UK broadcasting. Most obviously, the vast majority of user-generated content on video sharing platforms does not need to be held to these standards. However, there are a number of different factors that can make content 'TV-like' or 'radio-like': for instance, whether it is professionally made, whether it is made by a large organisation, whether it is long-form, whether it reaches a large audience. In our view, content does not necessarily need to possess all of these features or meet all of these criteria in order to warrant regulation – it may only need to meet several or most of those on a checklist of what makes online content similar to broadcasting. But it is critical is that audiences can always easily tell what is and is not regulated content. And where content is not sufficiently 'TV-like' or 'radio-like' to warrant regulation under standards similar to the Broadcasting Code, audiences should still be easily able to understand what standards do still apply – i.e. those applied by the platforms that host that content.
4. Double regulation should be avoided: where a news publisher is a member of a news industry self-regulator recognised as Royal Charter-compliant by the Press Recognition Panel, it should not be subject to a second, additional system of regulation.
5. Ofcom should be the regulator for online video and audio content: given its role in administering the Broadcasting Code, and the fact it has already been given responsibility for the implementation of the Online Safety regime, it makes obvious sense that any new regime of standards regulation for broadcast-like online content should be implemented by Ofcom too. But we think this is likely to be a sizeable task, requiring further resources, and that it adds to the case (made above) for establishing a separate Public Media Commission to take over from Ofcom overall responsibility for overseeing PSM, as well as recommending to government the future level of Licence Fee funding for the BBC, assessing the collective fulfilment of the PSB remit, monitoring each public service broadcaster's fulfilment of its particular remit, and conducting external regulation of the BBC.
6. Not all content that would ideally be subject to regulation will be able to be: for instance, much of the online video and audio content available to UK internet users is produced abroad. For example, The Joe Rogan Experience, the most popular podcast in the UK, is made in America. In practice it is likely to be impossible to enforce UK broadcasting standards on non-UK content providers. But that is not, in our view, a reason to abandon the attempt to regulate any UK content either.
7. Regulation for high professional and ethical standards is a competitive advantage, not a disadvantage, for UK content: some will argue that standards regulation is an undue constraint on freedom of expression, or on the ability to compete in a global online marketplace with wholly unregulated foreign content. We reject both of these claims.
    a. First, freedom of expression is not an absolute – it is one of a number of competing rights, as reflected in the laws against defamation and contempt of court. The Broadcasting Code balances freedom of expression, on the whole very successfully, against other considerations like the need for programmes not to encourage or incite the commission of crime (section three), the need to avoid unjust or unfair treatment of individuals or organisations in programmes (section seven) and the need to ensure that there is no unwarranted infringement of privacy or in connection with obtaining material included in programmes (section eight). We think it is completely reasonable to expect these kinds of basic professional and ethical standards to apply to online content that is 'TV-like' or 'radio-like' too. We see no reason why the transition in media consumption from

broadcast to online ought to simultaneously be an effective deregulation of standards which have played an important role in British broadcasting benefiting from high levels of public trust domestically and an excellent reputation for quality internationally.

b. Second, and just as importantly, standards regulation is not a competitive disadvantage, it is an advantage. We would point here to the competition in the online news market between UK broadcasters, regulated for standards, and major UK newspaper publishers, who, as members either of IPSO or of no regulator at all, are subject to far weaker standards regulation. We find it hard to believe that the generally lower levels of trust in UK newspaper brands has been an asset in their competition with UK broadcasters for online news traffic. UK broadcasters' websites and apps have consistently been among the most popular for UK users, and we think a major reason why is that they have a reputation for quality which, among other things, is grounded in the high professional standards that they generally maintain, rooted in both the public service ethos of the major broadcasters and the standards regulation to which they are subject. Some may see standards regulation as an annoying constraint on their ability to compete in the online media market. We think that, as far as most consumers are concerned, media standards regulation is just another form of product standards regulation, or quality control. The fact that the UK's broadcasters are subject to high professional and ethical standards – standards higher than the press – is an integral part of why their journalism is perceived as high quality. Likewise, it is no accident that the TV news outlet with the lowest reported trust level in the Reuters Institute's annual Digital News Report – GB News – is also the one with the worst recent record of Broadcasting Code compliance.

Prominence of PSM content in the platform age

Question 22. How easy or difficult is it for you to find culturally relevant content on video platforms, including video sharing platforms like YouTube and TikTok and streaming platforms like Netflix and Amazon Prime Video?

Examples of culturally relevant content could include stories set in Britain, with British presenters, representing British values or referencing British events or customs.

Options:

- Very easy - I have no issues in finding culturally relevant content on these platforms
- Somewhat easy - I have very few issues in finding culturally relevant content on these platforms
- Neither easy nor difficult - no opinion either way
- Somewhat difficult - I have some issues in finding culturally relevant content on these platforms
- Very difficult - I have a lot of issues in finding culturally relevant content on these platforms
- Not sure

Answer: Somewhat difficult

Question 23. Prominence can be defined as giving certain content a privileged position, for example, ensuring a specific channel appears at the top of search results or features on a recommendation feed, within a user interface so it is particularly easy for audiences to find and watch.

To what extent do you agree or disagree that content from public service media providers (like the BBC and Channel 4) should be easier to find on video platforms?

Options:

- Strongly agree - it should definitely be easier to find Public Service Media content on these platforms
- Agree - it should probably be easier to find public service media content on these platforms
- Neither agree nor disagree - no opinion either way
- Disagree - it should probably not be easier to find public service media content on these platforms
- Strongly disagree - it should definitely not be easier to find public service media content on these platforms
- Not sure

Answer: Strongly agree - it should definitely be easier to find Public Service Media content on these platforms

Question 23a. What do you see as the benefits of content from public service media providers (like the BBC and Channel 4) being easier to find on video platforms?

Answer: Prominence has historically been one of the key benefits in return for which public service obligations have been required of UK broadcasters.

Initially this took the form of the allocation of scarce spectrum space for broadcast channels. Later, in the multichannel era, it took the form of EPG prominence. But as linear TV viewing declines, the value of that prominence for commercial PSBs has declined, and therefore so too have the public service obligations in return for which prominence is given. In short, the decline of linear viewing threatens the traditional PSM compact, as the consultation document notes.

The primary benefit of making content from PSM providers easier to find on video platforms is therefore that it provides a new form of prominence suited to on-demand viewing, in return for which public service obligations can continue to be made of PSM providers. Concretely, if making, for example, Channel 4's content easier to find on video platforms leads to higher viewing of that content, it will feed through into higher advertising revenue that allows C4 to make more programmes. In the case of the BBC, which does not collect advertising revenue, greater prominence online will help maximise the reach of licence fee-funded content. In all cases, improving the reach of public service content online helps PSM providers achieve the objectives of the public service remit.

The question, in our view, is less whether greater prominence for PSM on video platforms is beneficial, and more what forms that prominence can take, and *how* beneficial that prominence can be in the on-demand environment. If it is of less commercial value than traditional EPG prominence for commercial PSM, then either the public service obligations on those providers are inevitably going to be less in the long term than they have been previously, or the government

needs to develop new benefits in return for the fulfilment of public service obligations *in addition to* on-demand prominence.

There also needs to be consideration about how the prominence of PSM on platforms will be measured to ensure compliance (the same issue applies to regulation of social media etc. for the prominence of trustworthy news content). There are two options, which are not mutually exclusive:

- The first is requiring platforms to report on the interventions that they have made (e.g. changes to algorithms, pinning) and on the views of PSM content, ideally with a demographic and genre breakdown.
- The second is requiring platforms to share data to allow independent scrutiny of the prominence of PSM on their platforms.

Ideally, a combination of the two would be adopted, along the lines of the Digital Service Act (DSA) passed by the European Commission. The DSA requires regular transparency reports from platforms and places obligations on platforms to give access to data for the purpose of conducting research that contributes to understanding systemic risks to the EU or assessing the efficacy and impact of risk mitigation measures.[30] Access to data is only provided to coordinators of the DSA, the EC, and to researchers that meet relevant conditions (independence from commercial interests, ability to uphold adequate security standards, conducting research that meets the specific objectives of the DSA). In relation to the prominence of PSM, the government could require platforms to:

- Provide regular transparency reports detailing how they are complying with the legislation and user engagement with PSM.
- Provide access to data to independent researchers, Ofcom and the DCMS specifically to conduct research that evaluates the efficacy and impact of prominence measures introduced for PSM and contributes to understanding the systemic risks and/or benefits of these measures.

Question 23b. What types of content from public service media providers do you think should be easier to find on video platforms? (select all that apply)

Options:

- Arts and classical music
- Children's
- Comedy
- Drama
- Education
- Entertainment
- Factual entertainment
- Feature films
- General factual
- News and current affairs
- Religion and ethics
- Soaps
- Specialist factual
- Sports
- None of the above

[30] European Commission, "How the Digital Services Act enhances transparency online"

- Other (please specify)

Answer: All of the genres listed

Question 23c. On which video platforms do you think content from public service media providers should be easier to find?

All the major platforms where video content is found, i.e. the primarily video-sharing platforms like YouTube and TikTok, as well as social media platforms like Instagram, Snapchat, Facebook and X.

Question 24. Do you regularly create video content and upload it to video sharing platforms, such as YouTube and TikTok?

Options:
- Yes, primarily for fun or as a hobby
- Yes, primarily for professional purposes or to generate income
- No
- Prefer not to say

Answer: N/A

Question 24a. As a content creator or someone who uploads content to video sharing platforms, are there additional changes or features that you would want video sharing platforms to offer? For example, to increase the visibility of your content, transparency of systems or to make content more discoverable.

Answer: N/A

Question 24b. Thinking about the video sharing platforms you upload and share content on, do you have sufficient awareness of how content is shown to viewers through the algorithms?

Options:
- I have sufficient awareness of how the algorithm works
- I do not have sufficient awareness of how the algorithm works
- Not sure

Answer: I do not have sufficient awareness of how the algorithm works

A new system of public service media for television

Question 25. Which of the following, if any, attributes of public service media content do you value the most? Please select (up to) your top three.

Options:
- Diverse programming - content that features people like me, and people from different backgrounds

- Quality news - news content that is accurate, and helps me better understand what is going on in the world today
- Regional coverage - programming or content that keeps me informed about my area
- Quality content (non-news) - programmes or content that you see as high-quality and or different in their approach to what is offered by other providers
- Range - the availability of a range of different types of programmes (for example drama, comedy, entertainment, sport)
- Tailored to UK audiences - programmes that are specifically made for UK audiences, and are relevant to me
- Shared viewing opportunities - programmes and broadcast events that I can watch and talk about with others, for example family or my peers
- National cohesion - the broadcasting of events that bring the nation together for a shared viewing experience
- None of the above
- Not sure

Answer: VLV thinks all of these attributes of public service media are important and that it would therefore be wrong to select only three. We would also want to note that to fully meet the objectives of the Green Paper, services and content supporting the distinct societies and cultures of the UK nations - Scotland, Wales & Northern Ireland (as distinct from "regional" content) which has been increasingly weak and marginalised in recent years - will need to retain appropriate prominence, and in reinvigorated forms, in the future PSM context.

Question 26. Chapter 4.2 of the green paper outlines the challenges public service media faces and how the system tied to broadcast licences is relatively inflexible. The chapter suggests this limits the options for benefits and obligations Ofcom can place on public service media providers and makes it harder to open up the system to new providers. It is argued this risks the sustainability of the system as audiences move away from live broadcast TV to switch between linear, on-demand, and user-generated content on multiple devices.

To what extent do you agree or disagree with the suggestion that the public service media system needs to be reformed away from the current model that uses broadcast licences?

Options:
- Strongly agree - the system definitely needs to be reformed away from using broadcast licences
- Agree - I agree that the system may need to be reformed away from using broadcast licences
- Neither agree nor disagree - No opinion either way
- Disagree - I do not agree that the system necessarily needs to be reformed away from using broadcast licences
- Strongly disagree - I feel strongly that the system should continue to use broadcast licences
- Not sure

Answer: Disagree - I do not agree that the system necessarily needs to be reformed away from using broadcast licences

Question 26a. Please provide a reason and any supporting evidence for your view.

Answer: VLV would challenge the assumption built into question 26 that the PSM system is solely tied to broadcast licences. The system as a whole is *partly* tied to broadcast licences, but it is tied to a number of other things too: the public ownership and remits of the BBC and Channel 4, public funding of the BBC, high regulation for broadcasting standards. ITV and Channel 5's production of public service content is primarily tied to broadcast licences, and we agree there is a problem of sustainability here in the long term. But while considerable audiences continue to watch linear broadcast TV, there will remain some value for broadcast licences that come with significant prominence benefits, as the licences for the five main channels do.

We recognise the need for the PSM system to increasingly be tied to, for example, the provision of online services that also realise public service objectives, in return for which new benefits like online prominence should be conferred. In our view, these benefits should include access to additional public funding, through the public service content fund we have proposed above.

Question 27. The green paper outlines four potential principles of the public service media system.

In brief, these are:

- **Universality: to ensure that public service content remains universally available, free of charge, reflecting audience behaviours and media consumption habits.**
- **Public service content: to ensure provision of a wide range of high-quality, distinctive public service content.**
- **Systemic sustainability: to ensure the system of public service media has a mix of providers to increase its resilience to deliver public service media objectives in the long-term. It should also be sufficiently flexible to the potential shifts of the current collection of PSM providers and be open to opportunities of mergers, partnerships, and definitions of public service content.**
- **A sustainable PSM compact: to ensure the benefits PSM providers receive are proportionate to the obligations they must deliver for PSM status so as to be attractive and commercially sustainable.**

To what extent do you agree or disagree that each of the following should be considered by government as principles of the public service media system?

- Universality
- Public service media content
- Systemic sustainability
- A sustainable public service media compact

Options: Strongly Agree, Agree, Neither agree nor disagree, Disagree, Strongly Disagree, Not sure

Answer:
Universality: Strongly Agree
Public service media content: Strongly Agree
Systemic sustainability: Disagree
A sustainable public service media compact: Strongly Agree

Question 28. The green paper outlines three illustrative models for our public service media system to align with our proposed principles. These models are outlined below, and a more detailed description on each is presented in chapter 4 of the green paper.

- **A model focused on PSM institutions would see institutions, such as broadcasters or streamers, designated as PSM institutions.**
- **A model focused on PSM services would allow specific 'services' to receive PSM designation if they were to meet agreed requirements. In this context, 'services' could range from linear provision, such as an arts-focused TV channel, a high-quality VoD service, or channels on video sharing platforms, such as a history or documentary channel on YouTube.**
- **A content-centric approach would determine whether something is public service content subject to an agreed definition (which could evolve in line with cultural/societal needs) rather than a particular provider (institution or service).**

Please rank, in order, your preferred model of the public service media system, where 1 is your most preferred model:

Options:
- A model focused on PSM institutions
- A model focused on PSM services
- A content centric approach
- A combination of the models

Answer:
1. A model focused on PSM institutions
2. A model focused on PSM services
3. A combination of these models
4. A content centric approach

Question 29. Do you have any further comments you would like to add on the content covered by this chapter, or any further information that will aid us in interpreting your responses?

Answer: We have concerns about the potential principles of the public service media system the government has set out:

The first principle, universality, we agree is essential to PSM. But we would note here that the premium tiers of ITV and Channel 4's on-demand services are both a deviation from this principle. We return to this point below.

The second principle, 'public service media content', we think is too vague. PSM content is not only high-quality and distinctive, it must include (a) genres that are of national civic and cultural importance but which commercial non-PSM providers tend systemically to under-provide, such as children's programmes, news and current affairs, science, history, nature, arts and other specialist factual programming, (b) UK-originated content, and (c) content addressed to the needs and reflecting the lives of audiences across the UK. There is also no reference to the purposes of public service content, including, for example, promoting informed citizenship and active political participation; educating as well as entertaining; innovation and creativity; reflecting and representing the British public in all its social diversity.

The third principle, 'systemic sustainability', we think misunderstands what makes the PSM system sustainable. While we agree that the system having been a mixed ecology for many years has been beneficial – e.g. by having the PSBs focus more on different aspects of the overall public service remit, by giving audiences a variety of public service options to choose from – it is not having a "mix" of providers that ensures the sustainability of the PSM system. It is the sustainability of each public service broadcaster's model that does so. Focusing on a 'mix' of providers can too easily cover failing to address the sustainability of each individual public service broadcaster.

The third principle, 'a sustainable public service media compact', is one that we agree with. But that is why, online, it is going to require (a) more than just prominence to encourage public service content provision, and (b) less reliance on advertising revenue to fund public service content. First of all, we would point out that none of the big commercial streaming services – Netflix, Amazon Prime Video, Disney+, Apple TV+, HBO Max – relies primarily on advertising revenue. The high-choice nature of the online environment and the excludability that internet delivery of VOD makes possible have together combined to make subscription clearly the most effective model of commercial revenue generation for VOD providers. Competing against these providers with primarily ad-funded VOD services, as ITV and Channel 4 both do, will always mean they are at a competitive disadvantage, quite aside from the other major competitive advantages the US streaming services have.[31] Yet subscription goes against the first and most fundamental principle of the public service media system – universality.

Another way of putting this is to say that, in the past, the fruitfulness of advertising revenue allowed a compromise to be achieved between public service goals, including universality, and the operation of providers on a commercial basis. With the transition from linear broadcast to online, on-demand viewing has gone the decline of advertising as a primary means of funding TV-like video content. Logically, then, those PSM that exist primarily on a commercial basis – ITV, Channel 4 and Channel 5 – have to either diversify their sources of funding away from advertising or simply deliver less public service content. The severity of this threat to PSM is compounded by the rapid cost inflation in key programme genres caused by the flood of investment by SVOD services in content, particularly premium drama.

ITV has already taken steps to diversify its sources of funding, principally by becoming a production house for other content providers. Both ITV and Channel 4 have, as mentioned above, launched ad-free premium tiers for their VOD services. But these have clear limits to their potential as revenue sources, because without exclusive content – which would violate the PSM principle of universality – the benefits of the premium tier are basically limited to being ad-free, which puts a fairly low ceiling on the price and limits the appeal, compared to SVOD services with exclusive premium content behind their paywalls.

Logically, we think the only solution to this situation that preserves and enhances the production of public service content is to provide more public funding for PSM. As we have outlined above,

[31] These include: (1) Massive subsidies from their parent companies – Apple TV+ reportedly loses over $1 billion a year. See Variety, "Apple Is Losing Over $1 Billion per Year on Streaming Service, Has 45 Million Apple TV+ Subscribers (Report)", 20 March 2025. (2) Bundling with other popular services – Amazon Prime Video is bundled with the Amazon Prime delivery service, among other services. (3) Massive corporate borrowing to fund content investment – this was essential to Netflix's early rapid expansion. (4) The enormous size of the US domestic market, which affords major economies of scale of the kind fundamental to media markets, which tend to be characterised by high fixed costs and low marginal costs – a major factor in the US film industry's early dominance over the UK film industry.

we think this should take three forms: the reform and increase of the Licence Fee; a new public service content fund paid for by a tax on SVOD and pay-TV subscriptions; a review of possible new sources of future funding for Channel 4 (excluding private subscription).

A further option would be for government to intervene to regulate the terms of trade between PSM on the one hand and social media and video sharing platforms on the other, which it could introduce as part of wider prominence legislation, to enforce greater revenue and data sharing when PSM distribute content through these platforms.

Equalities impact

Question 30. There is a duty on public authorities to consider how their policies or decisions affect people with protected characteristics under the Equality Act 2010.

Do you have any evidence of the equalities impacts of any proposals set out in the consultation?

Answer: No.