

# Ofcom Broadcast and On Demand Bulletin

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## Pakistan Reporter

**Type of case** Broadcast Standards

**Outcome** In Breach

**Service** MATV

**Date & time** 08 February 2021, 22:22

**Category** Due impartiality

**Summary** A current affairs programme featured highly critical statements and allegations about the Pakistani authorities. The programme lacked any alternative viewpoints and was therefore not duly impartial. In breach of Rule 5.5 of the Broadcasting Code.

### Introduction

Midlands Asian Television (“MATV”) is a satellite television service that broadcasts Indian programming in Hindi, Urdu, English, Gujarati, and Punjabi. The licence for MATV is held by Middlesex Broadcasting Corporation Limited (“MBCL” or “the Licensee”).

*Pakistan Reporter* is a current affairs programme which discusses news stories from Pakistan and provides analysis through presenter and reporter commentary. Ofcom received a complaint that this programme was biased against Pakistan and its government.

This programme was broadcast in Urdu. Therefore, Ofcom prepared an English translation of the material and gave the Licensee an opportunity to comment on its accuracy. The Licensee did not raise any issues with the translation and we therefore relied on it for the purpose of our investigation.

### Summary

This 25-minute edition of *Pakistan Reporter* discussed the treatment of various communities within Pakistan, including the Baloch ethnic group, which resides in Pakistan’s southwestern Balochistan province<sup>1</sup>. The opening segment was about the funeral of a Baloch human rights activist, Karima Banuk

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<sup>1</sup> Pakistan is made up of four provinces: Punjab, Sindh, Khyber Pakhtunkhwa and Balochistan, as well as the disputed territories of Gilgit Baltistan and Azad Kashmir. Many ethnic groups reside within each of these

Baloch, who was known both within Pakistan and internationally for raising concerns about human rights violations in the Balochistan province allegedly carried out by the Pakistani intelligence agencies and the Pakistani Army. Media outlets reported that Karima Baloch was found dead in Toronto, Canada on 21 December 2020. Canadian investigating authorities had stated that the investigation into her death was non-criminal and not being treated as suspicious<sup>2</sup>.

The programme featured a presenter and two unnamed reporters: one male and one female. The presenter introduced the programme by saying it would include investigative reports on: alleged policies by the Pakistani state being used to mistreat the Baloch and Pashtun communities in Pakistan; anger towards the Pakistani state from minority groups as a result of the aforementioned alleged policies; and the demolition of Pakistani opposition party leaders' homes. The presenter introduced the programme's first news story, saying the Pakistani Army had allegedly halted Karima Baloch's family from attending her funeral:

*"...During Karima Baloch's last remaining funeral rites, the whole of humanity hangs its head in shame because of the tyranny of the Pakistan Army".*

The presenter continued:

*"Let us first talk about Balochistan, which the Pakistani Army has forcefully occupied. Pakistan's Army and secret-agency ISI<sup>3</sup> has brought shame to humanity by committing the most barbaric acts. Forceful kidnappings of innocent people and extrajudicial killings are common occurrences in Balochistan. But now, the Pakistani Army is also deciding to clamp down on the last funeral rites of Baloch martyrs. This particular truth was revealed after a famous exiled social worker from Balochistan, Karima Banuk Baloch, was mysteriously killed, and her corpse arrived at her ancestral village to be buried under the watchful eye of the Army's bayonets".*

The programme showed images of Karima Baloch, and footage of people in Balochistan province attending her funeral. This was followed by commentary from the programme's reporters as set out below, which was also interspersed with statements from local politicians, social workers and protesters.

The female reporter said:

*"Karima Banuk Baloch who raised her voice for the rights of Baloch people on an international level, was exiled from Pakistan's forcefully occupied Balochistan province. Her corpse was buried in the graveyard*

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provinces but the majority ethnic groups in each are: Punjabis in Punjab; Sindhis in Sindh; Pashtuns in Khyber Pakhtunkhwa; and Baloch in Balochistan.

<sup>2</sup> See [Body of Karima returned to Pakistan](#), The Guardian, 22 December 2020; [Family of Baloch Activist Who Died in Canada Claim Harassment by Authorities](#), The Wire, 10 April 2021.

<sup>3</sup> Pakistani Intelligence Agency (ISI).  
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*of her ancestral village under strict security measures. Ironically, the Pakistan Army did not allow her close relatives, village folk, and fellow social workers from all over Balochistan, to attend her funeral. The Pakistan Army did not only lock down the graveyard, but the entire village. They did not allow anyone to participate in the funeral rites. They even tried their best not to let her elderly mother-in-law participate in the funeral rites. The Pakistani Army's inhumane behaviour led Balochistan's social workers and political leaders to express their grief and anger".*

Following this, the female reporter continued:

*"Karima Banuk Baloch was mysteriously killed on 21 December 2020, in Canada's Toronto City. Unrest was already on the rise since Karima Baloch's mysterious killing, in which Pakistan's Army and secret agency were involved. However, the Pakistan Army's barbaric behaviour in regard to Karima Banuk Baloch's burial, has become the final nail in the coffin. This is why in Pakistan's capital, Islamabad, the Baloch Solidarity Committee held a 'candle march' as a tribute to Karima Baloch. Aside from the Baloch Solidarity Committee, social and human rights workers from the Awami Workers Party<sup>4</sup>, Pashtun Tahafuz Movement<sup>5</sup> and Aurat Azadi March<sup>6</sup>, participated in high numbers. They deemed the Pakistani state's oppression and inhumane treatment of Pashtuns and Baloch, a mark of shame on humanity".*

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Later the female reporter said:

*"The Pakistani Army and ISI is running a parallel government in Balochistan, and their increasing barbaric acts have not only solidified the desire to rebel amongst the Baloch, but other marginalised communities in Pakistan. This can be seen from the demonstrations of social workers. Victims of state oppression, like Pashtuns and Baloch, have no other way to express their grief and anger, except through protest. This is because the Baloch, overshadowed by the Pakistani State's bayonets, can find neither peace when alive nor when they are dead".*

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The female reporter continued:

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<sup>4</sup> [Awami Workers Party](#) is a left wing, socialist party based in Pakistan.

<sup>5</sup> Movement for the protection of the Pashtun ethnic group in Pakistan.

<sup>6</sup> The Aurat Azadi March is an annually held demonstration for women's rights in Pakistan.  
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*“The irony is, that Balochistan is not only blessed with materials such as gold, silver, copper, diamond, jewels, and Sui gas, but is also a seaport. Pakistan and China have created their ‘CPEC’<sup>7</sup> army to occupy these resources. However, they are treating the inheritors of this mineral wealth – the people of Balochistan, even worse than slaves. This is the reason why the Baloch nation is sick of the Pakistani Government’s dictatorship and military oppression. They are demanding freedom, in the interest of protecting their existence and future...”*

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The presenter said:

*“Let us now turn towards Lahore, the capital of Pakistan’s Punjab province. Let us look at the dictatorial mindset of Imran Khan’s Government which is causing chaos within [Pakistan’s] political circles. Even now, Imran Khan’s Government is obsessed with revenge, and continues to entrap opposition party leaders by filing small cases against them and throwing them in jail. However, now the opposition parties’ credible leaders and assembly members are having their houses bulldozed”*

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The male reporter said:

*“Imran Khan’s dictatorial Government, which is in power in Pakistan, is conducting operations against the occupation of illegal plots of land. They were just in the middle of bulldozing the residences and businesses of the opposition party members. In a frenzy of political retribution, Imran’s Government won’t abstain from destroying the residences of members of opposition parties, who are also Members of Parliament. A recent example of this was visible in the capital of Pakistan’s Punjab province, Lahore. Former Prime Minister Nawaz Sharif’s largest opposition party, PML-N, are members of the Punjab Provincial Assembly. In the dark of night, [Nawaz Sharif’s] relatives’ residences were bulldozed. This was called, ‘the height of dictatorship’”*

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Maryam Nawaz, Deputy Leader, Pakistan Muslim League (Nawaz)<sup>8</sup> said:

*“A system run by unbelievers can survive, but a system based on oppression cannot survive. We have tolerated the standards they are going out to set. By the grace of God, Muslim League Noon stands*

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<sup>7</sup> CPEC: China-Pakistan Economic Corridor. This is an economic corridor which aims to connect China with the Middle East (through Pakistan). The corridor passes through Pakistan’s southwestern Balochistan province.

<sup>8</sup> The Pakistan Muslim League (Nawaz) is one out of many continuing factions that emerged out of the Pakistan Muslim League, the party that was instrumental in the creation of Pakistan in 1947. They are also referred to by the names: PML-N, Noon League, and Muslim League Noon.

*united, despite four years of coercion, oppression, and retribution. By the grace of God, they welcomed Nawaz Sharif's narrative. They refused to switch their loyalties. This is perhaps the first time in Noon League's history, that it refused to bow down to the present government's oppression. It refused to be broken apart. So, this is a failure of Imran [Khan] and his allies, which will go down in history".*

The male reporter said:

*"Maryam Nawaz Sharif said that in a country where Shahbaz Sharif, his son Hamza Shahbaz and other opposition political party leaders are imprisoned, even though Imran Khan's dictatorial government and the so-called 'accountability' bureau have been unable to prove their crimes – it is useless to expect justice to be served in accordance with democratic principles. The worrying thing is, Imran Khan's puppet government which receives the backing of the army establishment, and PTI's Jahangir Tareen who himself is involved with the sugar mafia, is threatening PML-N leaders, and constantly conspiring to force them to change their political loyalties".*

The presenter said:

*"The Pakistan Army establishment's puppet Prime Minister, Imran Khan's dictatorial attitude has not only caused political turmoil within opposition parties, but also in the Parliament and the Senate. A recent example of this was revealed during a meeting in the upper house of the Pakistani Parliament. During this meeting, the Islamabad Government's underhand Federal Ordinance approved to occupy Balochistan and Sindh's natural resources, specifically the islands, was deemed a conspiracy to divide Pakistan".*

The female reporter said:

*"The Army establishment which has occupied the seat of power in Pakistan, and their puppet Imran Khan, have stealthily passed the National Islands Ordinance on September 2020, in a bid to permanently capture Balochistan and Sindh's natural resources. They created the National Islands Authority and handed over Sindh and Balochistan's coastal areas to the Pakistan Army. Imran Khan's Government's dictatorial ordinance has created waves of anger across Sindh and Balochistan. This is why in the Upper House of the Senate in Parliament, opposition parties termed Imran Khan's dictatorial policies a danger to Pakistan's integrity".*

Mir Kabir Khan Baloch, Senator, National Party, Balochistan:

*"To hand over Sindh and Balochistan's coastline to Islamabad, to separate Gwadar from Makran division, or to make Karachi dependent*

*on the Federal Government, to create the National Coastal Development Authority, under which the coastal areas of Sindh and Balochistan are being handed over to Islamabad, along with these incidents a so-called rumour has been going around for the last four months. Islamabad says, 'South Balochistan'. Mr. Chairman, these are the steps leading up to the 'One Unit' programme. We made many sacrifices fighting against this in the 1970s. We went to jail. We spent time in concentration camps. We spent time in jail in Mach.<sup>9</sup>"*

Text on-screen said:

*"In Pakistan, the Presidential palace is a mouthpiece".*

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Text on-screen said:

*"The Baloch have been made foreigners in their own land".*

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The presenter later said:

*"Now finally, let us turn towards the Army puppet, Imran Khan's dictatorial government's increasing attacks on press freedom. The most recent and vile example of this happened in Pakistan's capital Islamabad. The worrying aspect of this was, the person accused of murder in an anti-terrorism court and their lawyer, committed violence against a media official".*

A recorded report was then played in which the male reporter said:

*"You might think this is a film set for an action movie, with all the shouting and screaming. This is evidence of increasing lawlessness in Pakistan. In Pakistan's capital Islamabad, three accused persons in a murder case were presented before an anti-terrorism court. The three accused attacked a cameraman for covering the event. The three accused and their lawyer kept on attacking the man. Police officials just stood back and watched".*

The cameraman said:

*"I was making a video...All of a sudden, they started to attack me. They took my mobile. You can see my condition. Our job is to cover things, we don't know who did what or when. If you are such nice people, then what are you doing here? The police were just stood there, watching me get beaten. This was my police protection. What kind of protection is this, where your teeth and head get kicked in? My head is still spinning".*

The male reporter said:

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<sup>9</sup> A small town in Balochistan province.  
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*“It’s not just terrorists and criminal, but federal ministers and government advisors also attack media workers. For example, Imran Khan’s Minister for Communication, Dr. Shahbaz Gill came to see a journalist who had faced ill treatment”.*

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For the reasons set out in this Decision, it is Ofcom’s view that the programme was dealing with matters of political controversy and/or matters relating to public policy, namely, allegations about the policies and actions of the Pakistani Government and the Pakistani Army in relation to: the death of Karima Baloch; treatment of minority ethnic groups by the Pakistani Government more generally; and the treatment of opposition politicians and media personnel.

We therefore considered that this programme raised potential issues under the following rule in [the Broadcasting Code](#) (“the Code”):

Rule 5.5: “Due impartiality on matters of political and industrial controversy and matters relating to current public policy must be preserved on the part of any person providing a service... This may be achieved with a programme or over a series of programmes taken as a whole”.

Ofcom therefore requested comments from the Licensee on how the programme complied with this rule.

## **Response**

MBCL said that the programme is received pre-recorded from India and Pakistan and “in the last nine years we have been investigated several times for similar programmes”. It stated the programme is broadcast two or three times a week and “in these last nine years we must have shown not less than 1,000 episodes...of realistic journalism”.

The Licensee said, “if you watch all episode[s] you will see we have given a very balanced coverage”. It went on to state it is “critical of [Government] action where humanity is suffering” and “as a Channel [we] are not making any false accusations”. It added its broadcast content represented its “journalistic right [and] we have also applauded the Pakistani establishment where they have done good work”. Furthermore, MBCL said “it is unfair to judge us with only one episode” and “we presume [an] over enthusiastic Pakistani viewer must have seen only one episode and has decided to file a complaint to Ofcom”. The Licensee also added that since the targeted audience is mainly the British Asian community, its reporting teams are also from the Asian subcontinent.

MBCL went on to say that the programme contained the testimony of a media worker who works for a Pakistani owned TV network and claimed to have been attacked by the Pakistani Government, and therefore the complaint that the content was biased “is absolutely [untenable]”. The Licensee added that “the commentary [in the programme] is backed by competent videos” and it hoped that Ofcom would allow “realistic factual journalism”.

The Licensee also said that whilst MATV is a UK based channel, it has Indian owners and therefore it believed the complaint had been made by Pakistani people “just out of hatred”. Finally, it said that “the content is not imaginary” and “as the code says...we must balance our views... which we do all *Issue 441 of Ofcom’s Broadcast and On Demand Bulletin* 20 December 2021

the time” however, it considered “it is not possible not to criticize Government when there are clear cases of wrong doings.”

## Decision

Reflecting our duties under the Communications Act 2003, Section Five of the Code requires that the special impartiality requirements of section 320 of the Act are met.

Section 320 sets out the special impartiality requirements, which include the preservation, in the case of every television service, of due impartiality on matters of political or industrial controversy and matters relating to current public policy. This section requires Ofcom, for the purposes of setting the due impartiality rules in the Code, to take particular account of the need to ensure the preservation of impartiality in relation to matters of major political or industrial controversy.

Rule 5.5 requires that “due impartiality on matters of political or industrial controversy and matters relating to current public policy must be preserved on the part of any person providing a service... This may be achieved within a programme or over a series of programmes taken as a whole.”

Every time Ofcom applies the Code to broadcast content, Ofcom gives careful consideration to the broadcaster’s and the audience’s Article 10 rights. This encompasses the broadcaster’s right to freedom of expression as well as the audience’s right to receive information and ideas without interference. In order to establish a Decision on whether due impartiality was maintained in this programme, Ofcom has taken into account the Article 10 rights and the relevant contextual factors.

To assist broadcasters in complying with the due impartiality rules in Section Five of the Code, Ofcom has [published Guidance](#). Among other things, Ofcom’s Guidance makes clear that it is an editorial matter for the broadcaster as to how due impartiality is preserved, as long as the Code is complied with<sup>10</sup>; and there are a range of editorial techniques for maintaining due impartiality.

In light of the above, and in line with the broadcaster’s right to freedom of expression and the audience’s right to receive information, Ofcom underlines that the broadcasting of highly critical comments concerning the policies and actions of any government or state agency is not, in itself, a breach of rules on due impartiality. However, depending on the specific circumstances, it may be necessary to reflect alternative viewpoints or provide context in an appropriate way to ensure that Section Five is complied with.<sup>11</sup>

## Application of Section Five of the Code

Ofcom first considered whether Rule 5.5 applied in this case – that is, whether the programme concerned matters of political or industrial controversy or matters relating to public policy.

This edition of *Pakistan Reporter* featured a report on the death of Karima Baloch and included statements that were strongly critical of the Pakistani Army and intelligence agencies, alleging they

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<sup>10</sup> [Ofcom’s Section Five Guidance](#), paragraph 1.6.

<sup>11</sup> [Ofcom’s Section Five Guidance](#), paragraph 1.32.

played a role in her death<sup>12</sup> and interfered with her funeral. There were also a number of statements in the programme that were highly critical of the Pakistani Prime Minister, Imran Khan, in relation to Karima Baloch's death; and of the Pakistani Government's policies in the Balochistan province more generally.

For instance, on the subject of Pakistan and China's collective "CPEC"<sup>13</sup> project, based in Balochistan, the female reporter said *"Pakistan and China have created their CPEC army to occupy these resources. However, they are treating the inheritors of this mineral wealth – the people of Balochistan, even worse than slaves"*.

The programme also alleged that *"the Pakistani Army and ISI is running a parallel government in Balochistan"* and termed their actions as *"barbaric"* saying *"their increasing barbaric acts have not only solidified the desire amongst the Baloch to rebel, but other marginalised communities in Pakistan"* and *"the Baloch...can find neither peace when alive nor when they are dead"*. Subsequently, some text on-screen appeared, which read: *"The Baloch have been made foreigners in their own land"*.

The programme included specific allegations that the Pakistani Army and ISI were committing Human Rights violations in Balochistan, including *"kidnappings of innocent people and extrajudicial killings"*, involved in *"killing Baloch Human Right activist, Karima Banuk Baloch"* and *"forcefully occupying"* the province of Balochistan *"to permanently capture Balochistan and Sindh's natural resources"*. The programme further included serious allegations that Imran Khan's Government was involved in *"entrap(ping)"* and sending opposition party leaders to jail then *"having their houses bulldozed"* and also involved in the *"inhumane treatment of Pashtuns and Baloch"*.

The Pakistani Government and Army were described as: *"tyrannical"*; *"dictatorial"*; *"barbaric"*; and *"oppressive"* throughout the programme and accused of *"increasing attacks on press freedom"*.

We therefore considered that the programme was clearly dealing with matters of political controversy, or matters relating to current public policy, namely, the alleged policies and actions of the Pakistani Government, the Pakistani Army and the Pakistani Intelligence Agency (ISI) in relation to the treatment of Pakistani citizens, including the Baloch, Pashtuns, journalists and political leaders of the opposition. Rule 5.5 was therefore engaged.

### **The preservation of due impartiality**

Ofcom went on to assess whether due impartiality was preserved in the programme. In judging whether due impartiality has been preserved in any particular case, the Code makes clear that "due" means adequate or appropriate to the subject and nature of the programme. "Due impartiality" does not therefore mean an equal division of time must be given to every view, or that every argument

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<sup>12</sup> According to what Canadian police officials revealed to media outlets at the time, the investigations showed that Karima Baloch had died of natural causes, although human rights groups and activists have called for further investigation into the incident. See: [Canadian police rule out foul play in Pakistani activist death](#), Al Jazeera, 23 December 2020.

<sup>13</sup> CPEC: China-Pakistan Economic Corridor. This is an economic corridor which aims to connect China with the Middle East (through Pakistan). The corridor passes through Pakistan's southwestern Balochistan province. *Issue 441 of Ofcom's Broadcast and On Demand Bulletin* 20 December 2021

must be represented. Due impartiality can be preserved in a number of ways and it is an editorial decision for the broadcaster as to how it ensures this.

The Code also makes clear that the approach to due impartiality may vary, according to the nature of the subject, the type of programme and channel and the likely expectation of the audience. In addition, context, as defined in [Section Two \(Harm and Offence\) of the Code](#) is important in considering whether due impartiality has been preserved.

As set out above, Ofcom considered that there were a number of statements about the Government of Pakistan and its Prime Minister Imran Khan, which were highly critical of their actions and policies towards the Baloch, Pashtuns, journalists, and political leaders of the opposition. There were also many critical statements made about the Pakistani Army and intelligence agencies.

Ofcom's Guidance to Section Five<sup>14</sup> notes that the broadcasting of highly critical comments concerning the policies and actions of any government is not in itself a breach of due impartiality. It is essential that current affairs programmes are able to explore and examine issues and take a position, even if that position is a highly critical one. However, a broadcaster must maintain an adequate and appropriate level of impartiality in its presentation of matters of political controversy. It may be necessary, in order to comply with the due impartiality requirements, that alternative viewpoints are broadcast.

It is Ofcom's view that the programme in this case lacked the inclusion of any alternative viewpoints on the matters of political controversy and current public policy that were discussed. For example, the viewpoint of the Pakistani Government under Imran Khan, and/or the Pakistani Army and intelligence agencies were not reflected in the programme. The programme also did not contain any response from the Pakistani Government, Army and/or intelligence agencies to the very serious allegations made against them, for example, that they were involved in the killing of a Baloch human rights activist; they were treating the people of Balochistan "*even worse than slaves*" and their actions were "*tyrannical*" and "*barbaric*".

According to Rule 5.5, broadcasters may maintain due impartiality within the programme, or a "series of programmes taken as a whole". The Code defines this term as "more than one programme in the same service, editorially linked, dealing with the same or related issues within an appropriate period and aimed at a like audience".

The Licensee stated that it had provided "very balanced coverage" in all of the episodes of *Pakistan Reporter* across nine years of programming and had "praised the Pakistani establishment where they have done good work". However, it did not cite any examples of any other linked episodes which illustrated how due impartiality was maintained in relation to this particular politically controversial matter.

Ofcom was mindful of the Licensee's argument that the programme included the report of a media worker who was working for a Pakistani owned television company and therefore included an alternative viewpoint, so could not be considered as biased. However, the media worker's testimony was also highly critical of the Pakistani authorities and included claims that police officials "*just stood*

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<sup>14</sup> [Ofcom's Section Five Guidance](#), paragraph 1.34.

*there, watching me get beaten*” during a violent attack. Therefore, the inclusion of this material did not represent an alternative view on the issue of the Pakistani Government and state agencies’ policies and actions towards minority groups, journalists, and opposition politicians.

In its representations the Licensee stated that the content was pre-recorded in India and Pakistan. However, this does not negate the need to ensure that material broadcast on Ofcom licensed services is duly impartial and complies with the Code.

The Licensee further stated that it has a journalistic right to cover what is happening in Pakistan and the content of the programme “is backed by competent videos”. It also said that “it is not possible not to criticize Government when there are clear cases of wrong doings.” Ofcom is concerned that in general, the Licensee’s representations seem to demonstrate a lack of understanding about what is required to comply with the Code. In this case, Ofcom is not investigating under the rules for due accuracy (which apply to news) or material misleadingness (which apply to factual matters in non-news programmes) but rather Ofcom’s rules for due impartiality in programmes about matters that deal with political or industrial controversy and matters relating to current public policy.

While broadcasters are entitled to broadcast statements that are critical of governments and other institutions, in this programme the critical statements were about politically controversial matters. The Licensee was therefore required to preserve due impartiality in order to comply with the Code, and alternative viewpoints on these matters were lacking in this case. For example, the programme did not include, in any form, the perspective of the Pakistani Government (or Army or Prime Minister) or its response to any of the highly critical allegations. We recognise, and have fully taken into account, the broadcaster’s right to freedom of expression and the audience’s right to receive information and ideas in this case. However, the Licensee is still required to comply with the Code, and Ofcom’s Decision is that it did not do so in this instance.

For the above reasons, it is Ofcom’s Decision that MBCL failed to preserve due impartiality in accordance with Rule 5.5 of the Code.

### **Breach of Rule 5.5**

In [Issue 323 of the Broadcast and On Demand Bulletin](#) we recorded two breaches of Rule 5.5 against MBCL. In that case we said we were concerned that the Licensee’s representations demonstrated a fundamental lack of understanding about its obligations under Section Five of the Code. In light of that breach we held a meeting with MBCL to discuss its compliance in this area.

In [Issue 391 of the Broadcast and On Demand Bulletin](#) we recorded a further breach of Rule 5.5 against MBCL. We are therefore concerned about this Decision of a further breach of the due impartiality rules. We are also concerned that despite the previous assurances given by the Licensee to Ofcom about its compliance processes in this area, MBCL’s representations still seem to demonstrate a lack of understanding about what is required to comply with the due impartiality requirements of the Code. We are therefore requiring the Licensee to attend a meeting to discuss its compliance in this area. We will also undertake monitoring of the channel and are putting the Licensee on notice that if any further similar breaches occur, we will consider taking further regulatory action.