



Prominence and accessibility on connected TV platforms

**Ofcom's draft code of practice and draft guidance on the agreement objectives.**

March 2026

## Introduction.

1. Pact is the UK trade association which represents and promotes the commercial interests of independent feature film, television, digital, children's and animation media companies.
2. The UK independent television sector is one of the biggest in the world, with revenues of £3.66 billion in 2024.<sup>1</sup> Large parts of the resulting revenues are invested back into the development and production of UK content. The sector is a key part of the UK's growth plans as it, along with others in the screen sector, saw 8.4% growth in December 2024 offsetting the declines seen in other areas of the service sectors.<sup>2</sup>
3. Pact works on behalf of its members to ensure the best legal, regulatory, and economic environment for growth in the sector. Pact has around 800 member companies across the UK, including 56 companies in Scotland, and the majority of these are SMEs (small and medium sized enterprises) with a turnover of less than £50m a year.
4. The UK public service broadcasters (PSBs) are by far the biggest investors in UK original content and as such, their future is of paramount importance to Pact and our members.
5. For further information, please contact Pact's Director of Policy, Emily Oyama at [redacted].

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<sup>1</sup> Pact Census 2025

<sup>2</sup> [GDP monthly estimate, UK - Office for National Statistics](#)

## **Response.**

**Do you agree with our proposals on app menus, and our assessment of their associated impacts? Please provide your reasoning, and if possible, any supporting evidence.**

**Do you agree with our proposals on listed channels, and our assessment of their associated impacts? Please provide your reasoning, and if possible, any supporting evidence.**

- 2.1 Pact is a strong supporter of the PSB system noting that many of our members benefit from the content investment that PSBs provide within the sector.
- 2.2 As identified by Ofcom, 73.8% of individuals watched broadcast TV on average each week in 2024, peaking at 95% for those aged over 65 and 45% among 16-24 year olds – the very demographic that Ofcom highlights is being lost.<sup>3</sup>
- 2.3 Continued certainty of DIPS positioning on linear RTSS is important for PSB investment and we would support the main PSB channels holding the highest nine positions on app menus provided UK wide, and the highest eight positions in app menus in Wales.

**Do you agree with our proposals on primary content areas, and our assessment of their associated impacts? Please provide your reasoning, and if possible, any supporting evidence.**

- 2.4 Pact broadly supports measures to ensure public service content remains easy for audiences to access across modern television interfaces. Public service broadcasters, including the BBC, ITV, Channel 4, and Channel 5 remain the largest investors in original UK content and therefore play a crucial role in sustaining the independent production sector.<sup>4</sup>
- 2.5 Despite a decline in PSB content investment in recent years, PSBs still account for over 83% of total UK commissioning spend with independent producers.<sup>5</sup> Ensuring that public service content remains visible and discoverable on television interfaces against other content is important for sustaining the wider production ecosystem.
- 2.6 Pact agrees that public service content should receive an appropriate degree of prominence within primary content areas on RTSS. As viewing habits increasingly shift from linear television to on demand services, it is important that audiences can easily discover public service content.
- 2.7 PSBs receive regulatory benefits, such as prominence and in the case of the BBC, licence fee funding, in return for delivering public service obligations including commissioning quotas for independent production and requirements relating to original UK content and regional production. If prominence protections are to be extended or strengthened in new interface environments, it would be appropriate to consider how this aligns with the overall balance of benefits and obligations provided to PSBs within the system.
- 2.8 As PSBs make greater use of digital-first commissioning and their own online services, the existing Terms of Trade framework will continue to ensure that independent producers retain the ability to exploit their IP – this must continue as PSBs seek to extend their prominence via connected TV platforms. As PSBs explore delivering public service content across a wider range of platforms, those same protections should continue to apply, providing consistency and clarity for the sector.

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<sup>3</sup> Ofcom Media Nations Report 2024

<sup>4</sup> Pact Census 2025

<sup>5</sup> Ibid