



Introduction

ITN welcomes the opportunity to respond to Ofcom's consultation on Channel 4's Public Service Broadcasting (PSB) licence renewal.

From the outset it is worth outlining ITN's unique role in the UK news and PSB-ecology, as one organisation with three separate newsrooms - ITV News, Channel 4 News and 5 News. ITN produces bespoke news for each broadcast client, spanning domestic and international coverage and breaking news stories and in-depth investigations.

While there is a clear editorial divide between each service, each client benefits from economies of scale in terms of infrastructure and operations. Employing around 848 staff including 320 journalists, ITN provides a vital role both in the provision of high-quality journalism and in contributing to a plurality of news provision that is so important for a democratic society that holds power to account and informs citizens about matters of public interest.

It should also be noted that ITN has produced Channel 4 News since the channel launched in 1982. It is one of only a handful of programmes that remains on the channel since it started broadcasting and is recognised as being intrinsically linked to the brand.

This consultation comes at a pivotal time for the future of the public service broadcasting system – as the shift away from linear viewing habits progress.

The introduction of the Media Bill is an acknowledgement of the rapidly evolving media landscape and the need for prominence of public service media online and flexibility in how public service broadcasters deliver on their remit.

ITN is a key stakeholder in these conversations and the views expressed in this consultation are derived from the privileged status of having over 67 years' experience in delivering broadcast news of the highest standard, informed by constructive regulatory guidance.

It is from this position that ITN has been keen to emphasise, in conversations relating to the Media Bill, the importance of news and specifically prominence of news online. This position also feeds into the current consultation assessing how Channel 4's licence conditions should be set.

Questions:

1. Do you agree with our assessment of the potential impact on specific groups of persons?

The Channel 4 News team is acutely aware of Channel 4's remit to: reach younger audiences; reflect alternative points of view; and offer content that reflects a diverse society. The programme strives to achieve those outcomes in its output across a range of mediums.

With these objectives in mind and in recognition of the impact that large technology platforms have had on the news industry, the programme has adopted a platform agnostic approach to how its content is offered.

ITN recognises that the channel and the wider media industry is in a period of transition balancing the needs of younger audiences, who rarely tune into the bulletins and scheduled content, with older audiences who may still rely on the linear schedules. As Channel 4 seeks to increase its digital content delivery and revenues, the terms of the licence should support that and ensure that it is able to reach new audiences while maintaining its distinctive identity.

Therefore, ITN agrees with the assessment that some older viewers may be impacted but this has been considered in the context of the channel's remit more broadly and key aims of continuing to reach younger viewers and those from underrepresented groups in society.

2. Do you agree with our Welsh language impact assessment?

N/A

3. Do you agree with our proposed approach to setting the new Channel 4 licence? Please provide reasons for your response, with any supporting evidence.

ITN recognises that the media environment is changing rapidly, and the news industry has been at the forefront of these changes.

Over the last decade, Channel 4 News has adopted an approach of seeking out new audiences online offering its content on third party platforms including YouTube, TikTok and Instagram.



The newsroom has adopted this position in recognition that audiences across all demographics are increasingly accessing news through social media¹ and that while the linear 7pm bulletin retains a following, there is an imperative to seek out audiences where they are naturally spending time. This proactive position means that the programme continues to reach younger audiences and audiences who may not feel represented on other programmes – two key objectives in C4's remit. The programme has over 12.6 million social followers across all channels – establishing it as one of the UK's leading digital-first news sources.

For example, on platforms such as YouTube and TikTok nearly close to half of the audiences watching Channel 4 News content are under 35. TikTok with close to 500m views through 2023, remains the fastest growing of the main social platforms for Channel 4 News, with +412% growth year-on-year and 62% of the audience on TikTok being under 35.

Meanwhile, views of Channel 4 News content grew to 393.5 million in 2023, up 25% year-on-year on YouTube which remains the largest digital platform for total viewership, with 1.4 billion minutes of long-form content viewed worldwide and 43% of the programme's audience is aged under 35. The significant levels of engagement in 2023 was driven in large part by the visceral coverage of Israel's War with Hamas. To put this performance into context Channel 4 News is Channel 4's most successful proposition on YouTube representing 39% of the channel's entire real estate on the platform.

Alongside this Channel 4 News has led the industry in demonstrating the commercial success of news, embracing advertising around content, particularly on YouTube. This has generated income to be reinvested back into the product, and helps underscore the need for flexibility as ITN works with the broadcaster in this transition period.

However, linear delivery should not be overlooked. In 2022, the weekday evening programme was watched by an average of 603,000 viewers. Its performance strengthened year-on-year: absolute levels of viewing grew by 2% among all individuals and held steady for 16-24-year-olds – an impressive feat at a time when total linear TV viewing has declined significantly.

With these figures in mind, ITN supports the approach proposed by Ofcom in setting the new Channel 4 licence. The performance across digital and linear channels demonstrates the need for flexibility in considering how news is delivered. Different audiences are seeking out Channel 4 News content from a plethora of sources and, the newsroom is delivering for that demand.

During this period of changing viewing habits, ITN supports a holistic approach in how metrics are considered and would urge caution over placing too much emphasis on one type of performance over another.

For example, ITN notes Ofcom's UK News Consumption methodology as a tool for tracking audience patterns across public service news programmes / services. ITN is keen to engage in proactive dialogue with the regulator and the broadcaster on measures to drive greater consistency in the model to standardise tracking across iPlayer, ITVX and Channel 4's online services.

This might necessitate engagement on structural innovations across 4 Streaming and Channel 4 News' web presence to understand shifts in audience patterns and guarantee brand prominence moving forward, as part of a wider move to future proof younger audiences as linear viewing declines.

Separately, while metrics are a key measurement of success these high levels of performance can only be achieved through sustainable funding of journalism.

Appropriate consideration should be given to ensuring that the funding of Channel 4 News is at least maintained during any transition to online delivery. ITN is currently commissioned to deliver linear programming with digital performance also prioritised. However, as the Channel 4 business model evolves, ITN is keen to underscore the need for continued sustainable funding for the delivery of high-quality journalism. This is particularly crucial during any period of transition as the newsroom continues to adapt and deliver across multiple platforms – placing additional pressure on resources which are currently structured around linear delivery.

¹ https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2023-06/Digital_News_Report_2023.pdf



4. Do you agree with our proposal to retain the condition requiring not less than 208 hours of news programmes in peak viewing time to be included in the Channel 4 service in each calendar year of the licensing period? Please provide reasons for your response, with any supporting evidence.

ITN acknowledges that the PSB ecology is changing due to changing audience behaviours and a wider range of content sources being offered online. That is why Channel 4 News has proactively sought out audiences on platforms where they are already increasingly spending their time – in what could be described as a platform agnostic approach.

However, linear services and the structure of the daily bulletins in primetime continue to offer an important framework for the delivery of news and current affairs programming. Therefore, ITN agrees with Ofcom's proposal to retain the condition of not less than 208 hours of news programmes in peak viewing time.

The current framework for delivering PSB news, grounded in prescriptive and detailed requirements from Ofcom has been highly successful to date. While it's true to say linear audiences are in decline; television news remains the most trusted sources of news, according to Ofcom's own research. Channel 4 News, specifically, continues to be one of the UK's most trusted news brands according to research by the Reuters Institute for the Study of Journalism² and YouGov³, last year.

During times of crisis and moments of national importance Channel 4 News' journalism plays a key role in delivering in-depth analysis, insights and different perspectives from other media outlets. The identity of the service is clearly linked to its positioning of being the original hour-long bulletin (although other PSB news services now deliver programmes of the same duration).

The programme's unique identity and content feed into the strength of the brand and, crucially, into retaining audiences' trust in a highly competitive and disaggregated media environment.

While the Media Bill continues to progress through Parliament, it is important that current requirements for news delivery are at least maintained as a minimum set of requirements for news provision and act as a benchmark for future iterations of regulation relating to online delivery of news and current affairs.

In wider conversations relating to future-proofing the broader PSB ecology and specifically the role of news within it, ITN has been keen to emphasise the importance of finding the equivalent of peak linear scheduling for news.

In practice this could mean that there would be an obligation on the online services of PSB providers and third-party platforms to prominently offer news – as the algorithms of these services are now becoming the driving force behind consumers' access to news content.

ITN would welcome continued consideration and recognition of distinct prominence obligations for tech firms vs public service broadcasters in surfacing their own online news content (in the case of Channel 4, 4 Streaming).

This would include further dialogue between the Online Safety Act – with its provisions for journalistic exemptions – and the scope of the Media Bill in defining vehicles for prominence of public service news content online.

The gap between the Online Safety Act becoming law and implementation has left some uncertainty for news providers. Ofcom has an opportunity to consider whether the principles guiding PSB broadcasting regulation may be applied to the delivery of news online to resolve any reluctance from large tech platforms in surfacing news content. With the proliferation of mis- and disinformation online, it is paramount that audiences are able to easily find trusted, accurate, public-service journalism.

5. Do you agree with our proposal to remove the lunchtime news scheduling requirement? Please provide reasons for your response, with any supporting evidence.

² https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2023-06/Digital_News_Report_2023.pdf

³ <https://yougov.co.uk/politics/articles/45744-which-media-outlets-do-britons-trust-2023>



The lunchtime bulletin provides structure and focus for the newsroom, but with linear audiences declining the relevance of a scheduled bulletin is also becoming less important. Consideration of this specific bulletin and its role in audiences' news consumption is illustrative of the wider production and policy considerations the media industry is currently working through.

Channel 4 News has already started to change its production processes to ensure that it delivers for its burgeoning online audience alongside the linear audience. The process is continually developing and at the start of the year, Channel 4 News started to think about how production of the lunchtime bulletin could be adapted so content could be shared swiftly online.

The changes in the production process offer an insight into the external factors that the newsroom is contending with. The lunchtime news bulletin offers the newsroom the opportunity to think about developments of the day, but it is not a crucial destination for audiences and the online delivery of content could be considered as a greater priority.

This insight is shared to demonstrate that while scheduling requirements may change, there is continued demand on the resources in the newsroom. It could be argued that one objective for Ofcom should be to consider the need to maintain the distinctive character and quality of Channel 4 News journalism, in a timely manner in a disaggregated environment in this licence renewal process.

In such a fast-moving environment, Channel 4 News is continually reviewing in-house innovations to furnish the Channel with news products for 4 Streaming, as it redoubles efforts to safeguard its digital-first future (e.g. podcast provisions etc), alongside creating content specific for third party platforms.

Any changes to linear scheduling and delivery of news should be carefully considered against the evolving media landscape and any potential impact on the brand.

Therefore, ITN is happy to support the proposal but would once again underscore the importance of ensuring that overall funding for the newsroom is at least maintained.

6. Do you agree with our proposal to retain the weekend news scheduling requirement? Please provide reasons for your response, with any supporting evidence.

ITN agrees with the proposal to retain weekend news scheduling with reference to the points outlined in question 3.

7. Do you agree with our proposal to require that there are not less than 178 hours in each calendar year of the licensing period of current affairs programmes included in the Channel 4 service which are of high quality and deal with both national and international matters?

As well as making Channel 4 News, the newsroom also produces Channel 4's long-running current affairs series, Unreported World. It was first broadcast in 2000 and continues to be recognised as a flagship destination for international current affairs stories.

Last year the programme won at the Foreign Press Awards for Gaza: Daring to Dream – a film exploring the underground art scene where young Gazans were trying to express themselves in the face of both an Israeli blockade and the censors of the Islamist government.

In Fighting for Space International Content and PSM, a report published by the International Broadcast Trust in November 2023, Unreported World was held up as setting "the standard for genuinely broad and challenging current affairs programmes, which the rest of the PSM system can learn from". It has also won an award for the Global Defence of Human Rights and is regularly featured as a 'Pick of the Day' across national newspapers and TV magazines.

Under the stewardship of Channel 4 News, the programme has also developed its own digital following, in keeping with Channel 4's wider strategy of digital transition as highlighted in the licence consultation report. The digital expertise of the newsroom has given the brand a new lease of life online.

The digital performance of Unreported World and its reputational impact is a clear example of why careful thought should be given to the impact on existing brands, when allowing quotas to be reduced for more content to be delivered online. As the title indicates, these stories are often going unreported elsewhere, from issues surrounding child trafficking in Texas to gender violence in Pakistan, and support Channel 4's remit of providing strong foreign news coverage and content that is markedly distinct.



The most significant consideration within this proposal is about whether funding will continue to be at least maintained at the same level even if quotas are reduced and whether quotas will be needed for online delivery.

- 8. Do you agree with our proposal to retain the requirement that 80 hours of the 178 hours must be in peak viewing time? Please provide reasons for your response, with any supporting evidence.**

As outlined in response to Q3, ITN supports the objective as of linear delivery in peak time. Until the equivalent prominence and delivery is found in online spaces, peak time provision is an essential tool to ensure audiences have easy and universal access to brands they trust and recognise.