



Directors UK response to Call for Input - Ofcom Review of Broadcast Regulation

About us

1. Directors UK is the professional association of UK TV and film directors representing over 8,500 members.
2. Film and TV are a great British success story, and directors are key to the creation of what is seen on our screens. The directors' role is to bring a script or story to life, their creative vision draws together all the different creative elements – scripts, actors/contributors, technical crew, designers – to create compelling films and TV.
3. Directors UK is both a membership organisation and a Collective Management Organisation (CMO). We negotiate, collect and distribute residual and royalty payments to directors and provide a range of services including campaigning, legal advice, events, training, and career development opportunities.
4. We welcome the opportunity to respond to this call for input into Ofcom's Review of Broadcast Regulation.

Our response

5. We recognise that the media landscape is rapidly changing and that public service media providers need to be assisted where possible to navigate this landscape and continue to produce a wide range of high-quality UK-originated content. Whilst considering this, it is important to note that the purpose of public service broadcasting (PSB) is to serve audiences around the UK and also to varying degrees to support the creative industries, including the UK's directorial talent. PSB is also important in ensuring that there is original UK content in at-risk genres, such as children's TV.

Nations and Regions Production and Programming - Preserving the out of London quota requirements

6. We note that the Call for Input's section on Licensing includes within it PSBs' programming obligations. Regarding the current obligations on out-of-London production, the Call for Input notes that PSBs are finding it harder to fund production and that this *"impacts the UK production sector – particularly smaller production companies and those in the nations and regions"*¹.
7. We also note that Ofcom's final statement on its latest Public Service Media Review, published last year, stated that: *"The PSB regional production quotas require that certain proportions of qualifying network programme hours and spend are made outside of London and (for Channel 4 and the BBC) in the nations, providing a backstop that supports production centres across the UK. In practice, PSBs have exceeded these quotas and shifted more of their network production across the UK. However, it has been suggested that, as budgets decline, commissions and resources risk being too thinly spread which could create some risks to sustaining critical mass in regional*

¹ [Call for input: Review of broadcast regulation: Call for Input. Ofcom, November 2025, p2](#)

production hubs over the longer term. This could ultimately impact on the range of creative ideas and content that represents and portrays audiences from across the UK.”²

8. We would be concerned if the suggestions raised to Ofcom regarding sustainable production centres consequently resulted in proposals to remove, or reduce, the current regulatory measures designed to ensure there is adequate investment in productions in the nations and regions.
9. The current Made out of London (MoL) quotas, and accompanying guidance, have ensured that there is spend being used to maintain production centres, ensuring audiences can enjoy content made in different parts of the UK, bringing a variety of directors and other talent, as well as diverse ideas, stories and landscapes to the screen. As last year’s PSM review noted, Channel 4 and the BBC have commitments for spend in the UK nations, with the BBC committing to spend in each individual nation, which is fitting given all nations pay the TV Licence Fee.
10. Across the piece, PSBs have not found meeting the quotas an issue and in the case of Channel 4, it has voluntarily committed in recent years to spending 50% of its commissioning budget outside of the M25, significantly above its quota of 35%. While it will in future be spending part of its production budget on its own in-house production, Channel 4 will nevertheless still be able to commit to significant out-of-London spend and it has invested in hubs and a network to do so.
11. While we believe representation across the UK has needed to improve across the PSBs as a whole, nevertheless even at current levels it supports many production companies and accompanying production talent, including directors. Without ensuring a lively production sector around the UK, which in turn reflect the lives, stories and voices of the UK’s varied populations and geographical areas, we believe it will be harder for PSBs to maintain their distinctiveness in the media landscape. This in turn could undermine the case for continued support for PSB if it is not serving audiences and sufficiently representing all of the UK.
12. In our response to Ofcom’s 2025 consultation on PSB quotas³, Directors UK supported the commitment to ensure the quantity of hours and spend was not negatively impacted by the change from proportional quotas to specific levels, and that an annual increase in spend had been factored in.
13. It should remain an imperative for all PSBs to spend a good proportion of their programme budgets around the UK. We have already seen a fall in the investment from elsewhere into out-of-London production, with the Pact/O&O Census for 2025 showing that: *‘international commissioner investment in the Nations & Regions declined, with their share of primary commissioning spend falling to 24%, a real-terms reduction of £112 million’*.⁴ The census also showed that share of spend on productions outside the M25 fell from 52% in 2023 to 48% in 2024.

² [Transmission Critical: the future of public service media. Ofcom, July 2025, p28](#)

³ [Directors UK’s response to Ofcom’s consultation on proposals to update the PSB quotas](#)

⁴ [UK Television Production Survey: Financial Census 2025 – Nations and Regions Annex. Oliver & Ohlbaum Associates / Pact 2025, p2](#)

14. If PSBs' out-of-London spend was also reduced, this would result in a significant fall in investment in nations and regions production, with a knock-on effect on the ability of PSBs to properly meet the demands and expectations of audiences around the UK. Research funded by Directors UK in 2025⁵ showed that there was already a concentration of directors in the London area and we are keen to see a greater diversity of directors based in more locations around the UK.
15. Regarding the PSM Review statement quoted above that '*commissions and resources risk being too thinly spread, which could create some risks to sustaining critical mass in regional production hubs over the longer term*', we do not think that addressing this necessitates reducing the quotas. The quotas do not determine that resources need to be spent on a certain amount of productions, or in which genres, thus leaving PSBs much room within which to manoeuvre in terms of how they allocate their MoL commissioning spend.
16. We also note that the Government is, in its Green Paper on the BBC Charter Review, considering increasing the BBC's responsibilities to out of London commissioning: '*We want the BBC to be more ambitious when it comes to driving economic growth, particularly in the nations and regions with stronger commitments to building clusters and sustainable commissioning to boost jobs and investment*'.⁶ We recognise that the BBC is unique among the UK-wide PSBs, in that it benefits from public money via the TV Licence Fee, however the core principle that investing in production around the UK helps foster sustainable businesses is sound and should be applied elsewhere.
17. The negative effect of removing quotas in PSB content provision has been observed in the past, by Ofcom itself. As Ofcom's third PSB Review observed: '*There is minimal provision in some genres: following the removal of specific quotas in 2003, PSB provision in arts and classical music, religion and ethics, and formal education has significantly reduced. In children's content, there is very limited provision of non-animation programming beyond the BBC*'.⁷
18. The statement went on to say this is due to a large fall in children's content provision on the part of the commercial PSBs: '*Since 2008, spend by ITV, Channel 4 and Channel 5 has dropped by 74% overall, to just £3m in 2014. The BBC in 2014 spent £84m; this now accounts for nearly 97% of total PSB spend in the genre. As a result there is little provision of UK- focused, non-animation programming for children beyond the BBC children's channels*'.⁸ The 2024 'Transmission Critical' report also noted that there has been a 43% drop in new PSB children's programming between 2014-2024⁹.
19. It is important for all PSBs to continue to invest in MoL production as collectively this makes it more sustainable. There is an inherent risk in Ofcom pre-guessing market conditions by reducing regulations in this area – it could lead to a similarly significant fall as observed in specific TTV

⁵ [UK Screen Directors \(2025\): A survey of earnings and contracts. CREATE/Directors UK, 2025, p21](#)

⁶ [Britain's Story: the next chapter: BBC Charter Review Green Paper and Public Consultation. DCMS< December 2025, p49](#)

⁷ [Public Service Broadcasting in the Internet Age: Ofcom's Third Review of Public Service Broadcasting – Statement. Ofcom, July 2015, p4, para 2.5](#)

⁸ [Public Service Broadcasting in the Internet Age: Ofcom's Third Review of Public Service Broadcasting – Statement. Ofcom, July 2015, p12, para 3.37](#)

⁹ [Transmission critical: the future of public service media. Ofcom July 2025, p15](#)

genres. The resulting contraction in production outside London would be accompanied by a contraction of talent, including directors, based all around the UK. This would make it harder to sustain production sectors if left to the BBC alone plus some ad hoc commissions. Out of London commissioning should be seen as a strength rather than a regulatory burden by all involved in the public service broadcasting space.

Revisiting the Made of out of London Criteria

20. While Ofcom's review is mainly focussed on reducing regulation, we believe it also provides an opportunity to adjust current requirements to ensure they are as effective as possible. In the context of out-of-London commissioning by the PSBs, there is a need to ensure the intention of the MoL quotas is followed.
21. Ofcom's regional production guidance states that in order for a programme to count towards the quota, relevant productions must meet two out of the following three criteria:
- a) A substantive base outside the M25
 - b) A minimum of 70% of total production spend outside the M25
 - c) A minimum of 50% of production talent, by cost, have their usual place of employment outside the M25
22. We believe these criteria should be reviewed, in order to ensure that the intention of the legislation - to employ local talent and commissioning in the nations and regions and build sustainable production bases across the country – is realised as much as possible.
23. As we stated in our response to Ofcom's consultation last year on updating PSB quotas¹⁰, our members working in the nations and regions are concerned that the Regional Production Guidance requiring productions to meet two out of the three criteria, means it is too easy to make a programme in the nations and regions without employing local production talent, particularly at a senior level.

Commitment to UK original productions

24. Similarly to the Made-out-of-London quotas, it is crucial that the UK PSBs continue to invest in original UK productions. Currently they are set quotas, decided by Ofcom, and we would hope that the level of these will not be called into question. Original UK productions set out PSBs from the competition. They are the lifeblood for UK audiences and the production sector alike.

Information provision to Ofcom

25. The Call for Input states that areas potentially to be considered for reduced regulation '*could include how requirements work in practice and the costs involved with compliance, including the provision of information to Ofcom*'.

¹⁰ [Directors UK](https://www.ofcom.org.uk/tv-radio-and-on-demand/public-service-broadcasting/consultation-proposals-to-update-the-psb-quotas) response to: <https://www.ofcom.org.uk/tv-radio-and-on-demand/public-service-broadcasting/consultation-proposals-to-update-the-psb-quotas>

26. Information provision is key to Ofcom's ability to regulate in a way that is evidence-based. For example, information regarding the types and volumes of production in different genres is key to identifying any genres being underserved that need addressing. We do not consider the amount of information required from the PSBs to be unnecessarily burdensome. This is not least due to the fact that, much of the information required would in any case be kept by the broadcaster as part of their own need to keep a close track of the content they are producing and how it performs to audiences.
27. We therefore believe that Ofcom should lean towards preserving the current level of information and reporting.

Directors UK
directors.uk.com
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