

NATIONAL UNION OF JOURNALISTS

RESPONSE TO OFCOM'S REVIEW OF BROADCASTING REGULATION

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Introduction

The National Union of Journalists represents over 5,000 members in the UK's broadcasting sector. As a key stakeholder in the industry, we are committed to strong and sustainable principles of Public Service Broadcasting (PSB). This includes colleagues in the BBC, ITV, STV, Channel Four, S4C and Channel Five.

While we are principally concerned with the provision of news and current affairs output, we also represent those in the wider creative sector making a range of programmes that come under the public service banner. We support the continuation of a healthy, properly funded public service broadcasting sector that goes beyond the basics. We back output of social value across the BBC and ITV, especially in the Nations and Regions. This includes – but is not limited to – local political programming, segments reflecting rural life and output that reflects the character of communities across the UK and Northern Ireland.

We note Ofcom's [Transmission Critical](#) report of July 2025 and the subsequent call for input into its recommendations. We have set out our responses in relation to Ofcom's three broad areas as covered in the Call for Input and refer to some of the key recommendations made in the July report.

Overarching principles

We believe that Public Service Broadcasting plays a critical and necessary role in the UK's media landscape, a landscape that has seen enormous expansion and evolution in the past two decades. The NUJ supports a system that allows plurality and choice in the marketplace, and output that is universally available. We recognise that while commercial broadcasters rightly have PSB obligations, the focus will naturally be on the future of the BBC. We note the wide, cross-party support for the BBC in [the recent Parliamentary debate](#) about its future.

We also call for any future model of regulation to consider the importance of programmes of "social value". As mentioned above, this is output that does not necessarily bring in large audiences (and therefore revenue for the commercial sector) but remains of importance to maintain a healthy and varied selection of content to the audience.

We note that, unlike its predecessor, Ofcom does not impose specific "quality thresholds" on individual Licensees. However, we would encourage the regulator to maintain an ongoing system of auditing and accountability to ensure Licensees are fulfilling their obligations in a meaningful way.

Public Service Broadcasting: the technological aspect

While Ofcom's Call for Input focuses on three broad areas, there are wider principles which we believe should be in the mix. Central to this is maintaining a universality of Public Service Broadcasting that is available to everyone in the UK. In [Transmission Critical](#), Ofcom calls for urgent clarity on the future of how television is distributed.

Freeview (also known as Digital Terrestrial Television, or DTT) is currently available to 99% of the population. And while we note – according to Ofcom’s own [Media Nations Report](#) – that just 67% people watch live TV via a TV set, careful consideration must be given to those who do not have a secure or fast digital connection at home.

The NUJ recognises that technological change is happening at pace. However, we urge utmost caution in any suggestion of reducing or removing DTT, until such time as free to air services (including public service media) can be universally received, free at the point of distribution.

Licensing

We note that Ofcom is considering possible changes to licences but doesn’t specify what these may be or how they would work. The NUJ agrees that some current aspects of licensing may be cumbersome, but they are there for a reason. Any future licensing structure must maintain the core principles of Public Service Broadcasting, particularly in relation to news and current affairs.

For the BBC and ITV, special conditions must exist compelling the broadcasters to maintain a commitment to high quality regional and local news output. A current and active case demonstrates what we mean by this.

We note with concern that Ofcom gave provisional approval to a revised watered-down version of its original plans which would see STV have a single news programme across its two North and Central licence areas, but with a guaranteed minimum amount of regional coverage. The NUJ has repeatedly criticised the plans as being bad for viewers, advertisers, and journalism. Members at STV [also went on strike](#) to oppose the plans.

There are real concerns that STV’s proposals could set a precedent for other ITV Licensees to do the same. We further note that this happened in 2004, where some long standing, dedicated regional programmes were merged into larger regions.

We therefore compel Ofcom to make it a condition that ITV cannot further reduce the number of regional programmes that currently exist. We also ask that existing levels of output in terms of hours and minutes remain in place. This applies not only to the 6pm news hour, but lunchtime, late night and weekend news.

Importantly, we believe that a healthy ITV regional news landscape in turn makes for a healthy BBC regional news landscape. While we note the rapid change in technology, we support a plurality in the broadcast news market, offering audiences choice and universality of provision.

We note that Ofcom has something of an arms-length approach to regulating the output of the BBC. The current arrangements require complaints to be firstly dealt with by the BBC and then escalated to the regulator if they’re not resolved. The BBC is in a privileged position, using public money to fund its service, and there is therefore an argument to consider additional scrutiny by the regulator. The NUJ believes consideration should be given to Ofcom – in some circumstances - intervening earlier, especially when it comes to matters of minimum output hours. For example, the regulator could take a more rigorous approach to monitoring and enforcing content on BBC Local Radio and assess performance via public consultation.

We also note that although much of commercial radio has now consolidated into national brands, Ofcom licences rightly require large companies to continue to provide local or regional news to areas where there were “legacy” radio stations. The NUJ would like to see the continuation of requirements for local news in any future radio licencing landscape.

More widely on the licencing regime, any future model from Ofcom must preserve the right for the audience to have legitimate complaints properly investigated. Where necessary, it should continue to impose fines or other sanctions against providers who are failing to adhere to the regulations. We further contend that government must ensure the regulator has the necessary powers to impose meaningful sanctions, including the option of removing an outlet's licence altogether if it repeatedly fails to meet the required standards.

We note Ofcom's assertion that some aspects of compliance can be costly. In broadcast, for example, the system of keeping output recordings for up to 60 days can appear cumbersome. We would cautiously welcome a relaxation of the rules for outlets like community radio, which may not have the resources to meet the current requirements. However, we believe that content standards are a cornerstone of PSB, and the existing rules should remain for the largest outlets.

Advertising

We note Ofcom's general points for a need to review advertising rules, specifically on the amount of advertising allowed on linear TV channels. The way in which audiences consume content is changing rapidly, and the NUJ recognises that commercial PSBs need to bring in revenue.

In [Transmission Critical](#), Ofcom notes the need for "stable and adequate funding" for PSB and that prominence should be given to output of "social value". This may primarily mean news and current affairs, but it can also extend to output that may not traditionally attract large audiences, and therefore large advertising revenues. Ofcom may consider allowing additional advertising time on linear channels, but this needs to be balanced with the already-diluted market. There is a danger that having reached saturation point, revenue would inevitably be spread more thinly, potentially resulting in a reduction of quality.

However, any changes in the rules must not be confused with the wider debate around how the BBC is funded. The NUJ remains opposed to any form of advertising on the BBC's UKfacing channels, across TV, radio and online. We note political arguments that the BBC could be part funded by an advertising model. But, as we have said above, the overall market may not be big enough to sustain such a system.

We further note that many commercial PSBs sponsor non-news parts of their news programmes – for example the weather or sports reports. While the NUJ is open to broadcasters exploring other streams of revenue to support news programmes, we would need to consult with our membership once any such proposals are published.

Content Standards

We note Ofcom's intention to implement a new Video on Demand Code under the Media Act, and the ambition to apply rules fairly across content under the Online Safety Act.

The NUJ believes that the fine detail of how content standards are defined and regulated should be set out in more explicit terms, incorporating a meaningful public consultation so a range of views can be gathered. For example, the Union supports a recommendation from [the Cairncross Review](#) for a News Quality Obligation. We believe that Ofcom's Broadcasting Code principles should apply to online content – including Video on Demand Services, and Ofcom should be empowered to regulate online news content produced by UK public service broadcasters in the same way it regulates broadcast content.

This recommendation, first made in 2019, is arguably more important now than ever before. [Transmission Critical](#) calls for greater investment by PSBs into media literacy, principally to combat the huge rise in misinformation and disinformation online. Ofcom's own ambitions, therefore, align with the principles set out by Cairncross. The NUJ would further argue that commercial providers – not just PSBs – should be compelled by regulation or legislation to contribute financially to the rollout of media literacy initiatives.

Issues of content control have come even more into focus recently, with both Ofcom and the government considering sanctions against social media platforms that allow inappropriate images to be created and distributed without consent. The NUJ believes that this could be another opportunity to promote and fund wider media literacy messaging to a range of audiences.

More broadly, the NUJ believes that a communications regulator needs to be given sufficient powers and resources to properly regulate the entire broadcast and digital landscape. Consideration should be given to those outlets and channels that claim to carry news content but also broadcast opinion-led (non-news) programming. The lines between factual news content and opinion content (based on factual events) are becoming increasingly blurred. We note that Ofcom dropped [plans to change its Broadcasting Code](#) in relation to serving politicians presenting news programmes. While out of scope of this specific review, the NUJ would like the broader issue of tougher regulation to be considered in any future legislation.

In conclusion

The NUJ recognises that times change, and the current regulatory framework has not kept paces with the scale of technological change witnessed in the past decade. However, as the broadcast and online landscape becomes ever more saturated, the core principles of Public Service Broadcasting must be preserved. Trusted and universal news provision is more important than ever before. PSBs can play a central part in countering disinformation, and Ofcom is in a unique position to ensure fair, consistent and robust regulation.

National Union of Journalists
Broadcasting Industrial Council

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