

Proposed amendments to the Broadcasting Code and the Code on the Scheduling of Television Advertising

Response from ViacomCBS Networks International

23 December 2020

ViacomCBS Networks International (VCNI) welcomes the opportunity to respond to this consultation on the proposed amendments to both the Broadcasting Code and the Code on the Scheduling of TV Advertising (COSTA).

ViacomCBS has been providing television services to UK audiences since 1987. We now own or part-own and operate more than 25 TV channels in the UK attracting close to 12% of viewing among 16-34 year-olds, making us the third-biggest privately held broadcast media group in the UK market. Our channels offer the very best in music, comedy, kids and general entertainment programming through the Channel 5, MTV, Comedy Central and Nickelodeon brands.

CHANGES TO THE BROADCAST CODE

VCNI acknowledges the need to amend the Broadcasting Code to reflect the changes mandated in the revised Audiovisual Media Services Directive (AVMSD).

We have taken note of the expanded language around hate speech, abuse and harmful content in Section Two and Section Three of the Code. We would like to reiterate however that there are some programmes, in particular within the comedy genre, where no harm is intended but content often challenges boundaries and uses humour to explore societal issues. We hope that Ofcom will continue to consider context and intent when themes of hate or abuse are explored within these types of programmes.

CHANGES TO COSTA

VCNI welcome the splitting of the COSTA code into two parts to provide clearer guidance for both channels targeting a UK audience under an Ofcom licence and those that will be broadcasting outside the UK under ECTT rules. For the sake of clarity, no VCNI channels broadcast under ECTT rules.

Mitchell Simmons
VP, Government Relations EMEA

o: +44 (0)20 3580 2680
m: +44 (0)77 1742 7264
Mitchell.Simmons@viacom.com