

Chris Rowsell
Controller, Regulation
BBC Policy

via email

14 April 2026

Dear Chris,

S4C on iPlayer changes

Thank you for sharing the BBC's materiality assessment on the proposal to enable advertising around S4C programming on BBC iPlayer.

Background

The BBC has proposed enabling advertising on S4C's linear content on BBC iPlayer. This proposal arises from the longstanding partnership arrangements between the BBC and S4C based on Clause 39 of the [BBC Framework Agreement](#). Under these arrangements, the BBC already hosts S4C's linear and on-demand content on iPlayer. S4C requested this change as part of recent updates to the partnership arrangements.

The BBC has assessed the proposal as a change to its non-service activities, specifically:

"the provision of the BBC iPlayer platform for the delivery of the UK Public Television Services, the UK Public Online Services, as well as third party content supplied by S4C."

The proposal would enable S4C to include on iPlayer the same advertising that appears around its linear broadcast service.

Scope of Ofcom's assessment

Ofcom's role is limited to determining whether this proposal constitutes a material change under the [BBC Framework Agreement](#).

The BBC has assessed whether the proposal constitutes a material change to a *non-service activity*. We note, however, that under Clause 39 of the Agreement the partnership between the BBC and S4C is designated as a "specified activity" for the purposes of Article 7 of the Charter, which sets out the activities the BBC is permitted to carry out.

We therefore do not consider it is clear under the Charter and Agreement whether the hosting of S4C content on iPlayer is to be considered as one of the BBC's "non-service activities" or whether it ought to be considered on a different basis (e.g. as an element of this specified activity or as a trading activity).

We do not consider it is necessary to take a decision to resolve this uncertainty. If this is a change to a specified activity, then Ofcom does not have a role to consider it. If it is a change to another form of activity, then we would need to consider whether this specific arrangement in respect of S4C could have any material impact on fair and effective competition. For the reasons set out below we do not consider that could be the case.

We note that the wider question of the hosting of third-party content on iPlayer has been raised as part of the Charter renewal process. We also note that the provisions under Clause 49(2) of the Agreement concerning (among other things) the licence fee and advertising are not a matter for Ofcom.

We have therefore reviewed the BBC's materiality assessment and considered the likely impact of the proposal on fair and effective competition subject to the above.

Our assessment

The BBC's analysis concludes that the likely impact of enabling advertising around S4C's linear content on iPlayer is very limited - S4C's expected incremental advertising revenue is extremely small relative to total spending on TV advertising in the UK, and therefore the BBC consider that it would not give rise to any material impact on fair and effective competition. Having reviewed the BBC's assessment and run some sensitivities on the underlying assumptions, we agree with the BBC and do not consider the proposed change is likely to have a material impact on fair and effective competition.



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