

# Transmission Critical

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## The future of Public Service Media

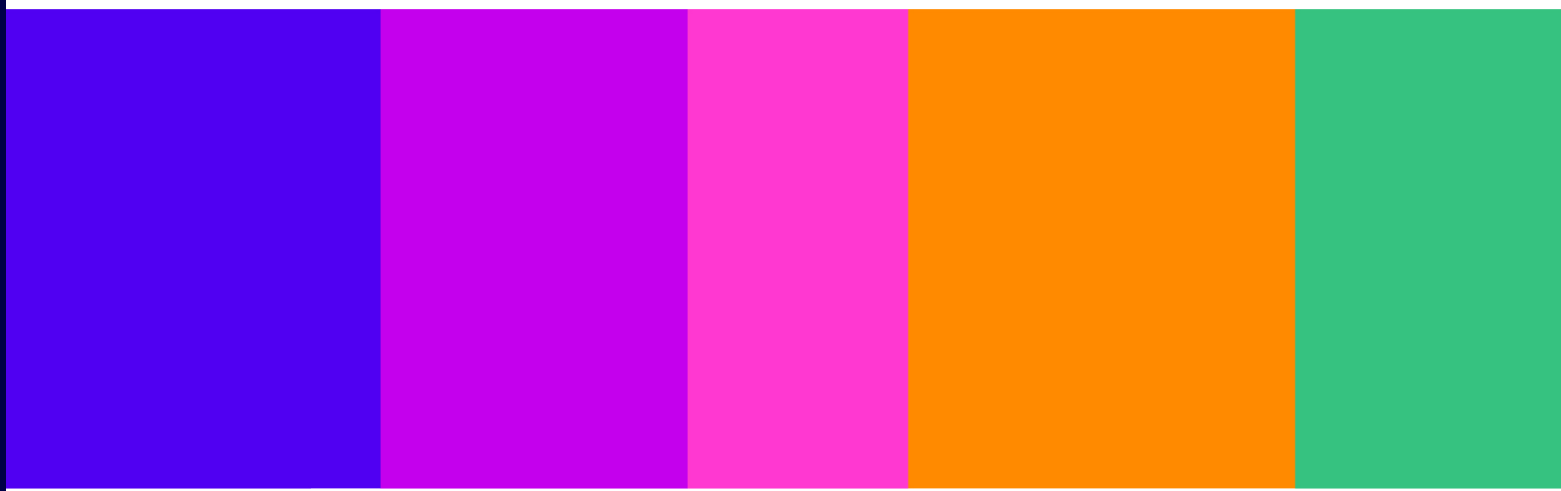
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### Report

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For more information on this publication, please visit

<https://www.ofcom.org.uk/tv-radio-and-on-demand/public-service-broadcasting/public-service-media-review>



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# 1. Overview

**The UK media landscape is undergoing rapid transformation. Traditional broadcasters are in a fierce battle for audience attention, while global tech giants flood the market with an ever-growing range of content.** These pressures are not unique to the UK. Services like Netflix and YouTube offer hyper-personalised experiences that are hugely popular with viewers and advertisers. Algorithms, tailored recommendations and instant accessibility are reshaping how a growing number of audiences discover and consume media. Emerging technologies, such as generative artificial intelligence (“GenAI”), are revolutionising how content is created, distributed and consumed. **These seismic shifts are well underway and the next few years will be critical in determining the future of UK broadcasting.**

**This review calls for urgent action, both now and in the coming years to strengthen and maintain public service media (“PSM”) content which provides trusted and accurate news, tells UK stories and represents the diversity of the nations and regions of the UK.** In this increasingly dynamic environment, it is critical that the PSBs provide content across multiple platforms ensuring audiences can easily find and engage with UK PSM. There is a compelling case for government to **extend prominence rules** to enable this.

We must also ensure that regulation does not stifle innovation or deter investment in PSM content, but actively support the growth and future sustainability of quality, diverse content. However, regulation alone will not address all of the challenges facing PSM: public service broadcasters must innovate and make content that engages audiences. Maintaining and strengthening PSM is a shared responsibility and everyone needs to play their part.

## An important part of UK culture is under threat

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The public service broadcasters (“PSBs”) – the BBC, ITV, STV, Channel 4, Channel 5 and S4C – remain the key providers of PSM. With the BBC at their heart, the PSBs benefit from a blend of public and commercial funding. **Together they offer distinctive services and a broad range of content which reaches all UK audiences.** Their competitive dynamic has driven high-quality programming.

The PSBs are universally available and have requirements to deliver trusted news, including local news, and an unmatched breadth of high-quality UK programmes that meet the needs and interests of UK audiences. This critical content supports participation in democratic society through holding governments and institutions to account and keeping audiences informed about local, national and international events. They also provide sporting and cultural programming that brings the country together and promotes a sense of shared values. **Without PSBs there would be significantly less UK content and there is a risk that society becomes ever more fragmented and polarised.**

## The UK creative sector is globally admired

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**The UK has one of the most successful creative sectors in the world – it is worth £124 billion (over 5% of the UK economy), with film, TV, music and radio contributing £22 billion.**<sup>1</sup> The PSBs are the cornerstone of the UK’s production sector, supporting production across the nations and regions and contributing to skills development. They are required to commission from independent producers,

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<sup>1</sup> [DCMS Economic Estimates GVA 2023 \(provisional\) – GOV.UK.](#)

who retain the IP of the programmes they make. Without the PSBs we would not have the highly skilled, creative workforce that has become a global leader in the production of television, film and digital media and attracts significant investment into the UK.

**Global streamers and other UK broadcasters also contribute to the rich variety of PSM that audiences enjoy.** A range of broadcasters deliver accurate and duly impartial news and, along with global streamers, commission high-quality UK drama and entertainment. Some of these – like Netflix’s *Adolescence*, *Say Nothing* on Disney+ and Sky’s *Artist of the Year* programmes – contribute substantially to British culture and public debate. **However, unlike PSBs, they often sit behind a paywall, and they are not required to be universally available, commission UK content or invest in the production sector across the whole of the UK.** Their current commissioning strategies could change.

**Commercial and community radio also provides news and programming, including local news, that allows audiences to keep in touch with their local communities.** In addition, there has been significant growth in viewing on video sharing platforms (“VSPs”) such as YouTube, increasingly being watched on the TV now that more than seven in ten households have connected TVs. They have a fast-growing body of user-generated and professionally produced content that covers a wide range of interest areas and is popular with young viewers and increasingly with older ones as well.

## PSM content is fighting to be seen and heard

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**Viewers now spend less than half of their in-home viewing on linear TV and this is declining.** As people move online they are watching programmes on a much larger range of services. Broadcasters’ video on-demand players only account for 9% of all viewing, significantly less than subscription streaming services (15%) and video sharing platforms (19%).

**The PSBs are responding by putting content on third party services, such as YouTube.** Their strategies are evolving as they learn what works, but our research shows that PSB content only forms a small proportion of what UK audiences watch on YouTube and they are competing with every other content creator in the world. **The PSBs will therefore need to work much harder to create content that audiences want to watch on these platforms.** In addition, the platform determines what content is promoted to users. This makes it harder for audiences to find PSB content, which undermines its universality, and may mean they are exposed to fewer genres or viewpoints. This trend is even more stark for children and young people – for example 4-15 year old children spend significantly more time watching YouTube than PSB services combined. **If children do not turn to PSB content as they get older, the future of PSM is at risk.**

**Audiences’ access to accurate local, national and international news they trust provides the foundation for civic debate and democratic society.** Seven in ten adults now get their news from online services, with around half of adults accessing news on social media platforms. This delivers benefits in terms of the breadth of news available, but also means **algorithms have a significant role in determining what audiences see** and that **high-quality, reliable news, including from the PSBs, may not be easy to find.** Our analysis has found that users who consume news on social media are less likely to correctly identify important factual information, have less trust in institutions and are more polarised in their views. There is also a greater chance of encountering misinformation and disinformation. It is not surprising that **people have significantly less trust in news on social media than broadcast news services** which are required to provide duly accurate and impartial news.

## Fundamental financial challenges will persist

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**In this increasingly dynamic environment, the PSBs are finding it much harder to fund the production and distribution of high-quality UK content to all audiences.** PSB revenues from the TV Licence fee and linear TV advertising have declined by more than a quarter in real terms since 2016, with growth in BVoD revenues failing to compensate. Costs are also rising – PSBs have to provide content across linear and online services and they are increasingly investing in more expensive high end content to attract viewers to their services. This has put significant pressure on broadcasters’ commissioning budgets and ability to continue providing both a breadth of content and some genres that attract less advertising revenue such as news and children’s programming.

It also impacts the UK production sector as PSBs remain crucial to the development of businesses and talent across the UK – particularly for smaller production companies and those in the nations and regions. It is possible that the rapid pace of technological developments, including the integration of AI into the supply chain will release cost savings, but the scale and timing of this is far from certain.

## Action is needed now

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Building on the challenges [we set out in December](#), we have considered a range of options that could help to support the future provision of PSM. As part of this, we have met with stakeholders from across the sector – including broadcasters, producers, platforms and audience groups. In this document we discuss options that different industry participants, as well as Ofcom and Government, could take to support the provision of PSM in a fast-changing environment.

The vital reforms in the Media Act, once implemented, will help support PSBs, including by making their on-demand players prominent on connected TVs. However, given the increasing levels of content audiences are watching and listening to on different services, it is unlikely to be enough on its own to secure the future provision of PSM content. Third-party platforms, including VSPs like YouTube, are now an increasingly important part of the UK media sector and play a key role in delivering content to UK audiences.

## Recommendations for action

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There is no silver bullet that will address the challenges that the sector is facing. We recommend that action focusses on six key outcomes. These will require change from everyone involved – the PSBs themselves, social media and VSPs, Government and Ofcom.

The six key outcomes are:

- 1. Prominence and discoverability for PSM content on the third-party platforms that audiences increasingly turn to. To deliver on this:**
  - > The PSBs need to keep adapting to audience preferences by constantly challenging themselves to test and iterate new ways of distributing and creating content for diverse audience groups.
  - > It is critical that the PSBs and YouTube work together to ensure that PSB content is prominent on its service, and on fair commercial terms. This is important for PSM to continue to connect with all audiences, particularly for news, which supports democracy, and for UK children’s programming which helps young audiences learn and grow.

- > The Government should consider whether this needs to be underpinned by legislation. This would require significant work but would give prominence for PSB content on YouTube statutory backing, just as the Media Act provides PSB players prominence on connected TVs and other devices.
  - > More widely, the Government may wish to explore prominence for news on social media and other platforms, even though implementation would be complex and would need to reflect the different ways that platforms promote content to users. In the meantime, the PSBs need to work with other VSPs and social media platforms to ensure their content is available and easily discovered by users.
2. **Stable and adequate funding to sustain a broad range of PSM content**, including trusted and accurate news, and programmes that showcase the diversity of the whole of the UK and bring the country together:
- > Stakeholders have called for a range of measures to support funding for PSM content like levies and changes to tax credits to fund specific PSM genres. It is for the Government to consider these, and to lead work on the future funding of the BBC through its Charter Review. However, if there is to be new funding we recommend that it should prioritise genres that are socially valuable but commercially less viable and attract lower advertising revenues, such as news, local news and children's programming.
  - > Content creators need to earn a fair return for their work on third-party platforms, including when used to train GenAI services. The Government is considering responses to its consultation on AI and copyright. The CMA has also recently opened a consultation on Google Search, which includes a number of potential interventions that should help improve commercial terms for content creators who rely on search.
  - > Ofcom's regulation will continue to support the provision of content that reflects the diversity of the UK – particularly in the nations and regions – including through targeted and proportionate quotas.
3. **Urgent clarity on how TV will be distributed in the future.** The PSBs are required to be universally available. As viewers increasingly move online, they have to broadcast over Digital Terrestrial Television (DTT) while also investing in distribution across multiple platforms. In this context, delivering content over DTT is quickly moving from being one of the PSBs' most valuable benefits to a significant cost. These resources could otherwise be used to both create PSM content and experiment with strategies for engaging all audiences in a rapidly evolving sector.
- > Last year Ofcom published a review of the options for the future of DTT including implications for spectrum use and digital infrastructure. We said a decision by Government would be needed within the next two years and we continue to believe a decision in early 2026 would allow sufficient time. A later decision risks undermining the investment and innovation needed to put universal TV distribution on a sustainable footing inclusive of all audiences.
4. **More ambitious partnerships amongst the PSBs.** Modern media organisations need technology to reach audiences and compete with global platforms who they depend on in some cases to reach viewers. Scale is critical for the PSBs' and domestic broadcasters' ability to connect with all audiences in a fast-moving sector:

- > The PSBs (and other UK providers) will need to be ambitious in pursuing new strategic partnerships – in technology and how they reach audiences.
- > Regulators, including Ofcom, need to assess any mergers or partnerships in the context of an up-to-date assessment of market conditions, recognising there continues to be fundamental change in the sector.
- > In its [Creative Industries Sector Plan](#) the Government has asked the CMA, supported by Ofcom, to assess how sector changes could affect the approval of “*strategic partnerships or possible consolidation between broadcasters which may benefit their financial sustainability and audiences.*”

5. **Investment in media literacy is vital for everyone’s ability to use digital services and to understand and critically engage with news and content.** Media literacy is, defined as the ability to use, understand and create media and communications across multiple formats and services. With the emergence of new technologies (including new forms of AI) the media landscape is only going to get more complex and personalised. Broadcasters are in a unique place to support audiences to critically engage with news content from a range of sources, distinguish fact from fiction, provide transparency about how they establish facts and raise awareness about conspiracy theories and prevalent fraud schemes. To help audiences develop their media and digital literacy skills:

- > The PSBs need to invest and contribute to media literacy in the UK and use their distinctive and trusted relationship with audiences to give them confidence to use digital services.
- > The BBC plays a further role, supporting media literacy through its children’s education initiatives. It is also considering how it can further support young people’s digital literacy skills so they can better assess trusted information and recognise disinformation.
- > Alongside broadcasters, online platforms including social media and VSPs, should enable media literacy by design. This autumn Ofcom will publish a Statement of Recommendations under the Online Safety Act, setting out how online platforms and broadcasters can empower their users to understand and engage with online media and services.
- > Ofcom has longstanding duties to promote media literacy and support others to carry out media literacy activities. But when it comes to the curriculum and education spending, it is for Governments – in Westminster and the nations – to ensure that the modern education system gives children and adults the skills they need for the future.

6. **Streamlined regulation which strips away any outdated unnecessary restrictions.** The majority of the current legislative and regulatory framework was designed for a linear world. It needs a fundamental review to determine what is required to support audiences as they shift their viewing and listening online and to encourage growth and innovation.

- > Ofcom is already implementing the Media Act which provides critical support for the PSBs, in particular through giving them greater flexibility to meet their obligations across their linear and online services and making their on-demand players prominent on connected TVs.
- > We are also working with Government on its BBC Charter review which will play a central role in supporting the future of PSM.

- > In parallel, we will review our regulation of broadcast TV and radio. We will seek input from stakeholders about the priority areas for reforming regulation and supporting the future provision of PSM content. We will look at what further reform is needed to ensure regulation supports all audiences benefitting from PSM content in the future and how we can ensure audiences are protected from harm wherever they are. This may involve legislative change as well as changes to our regulation.
- > Before the end of the year, we will publish a comprehensive call for evidence on the work we are intending to do.

**If no action is taken, the very existence of the PSBs – who are the main providers of PSM – will be threatened. Time is running out to save this pillar of UK culture and way of life.**

The overview section in this document is a simplified high-level summary only. The findings of our review and the reasoning and evidence are set out in the full document.



## 2. Introduction

### Ofcom's duties to review public service broadcasting

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Ofcom is required to review, at least every five years, the extent to which the PSBs, taken together, have fulfilled the purposes of public service television broadcasting through the provision of the PSB channels.<sup>2</sup> The PSBs are: the BBC, the providers of each Channel 3 service (each of which is a subsidiary of either ITV Plc or STV Plc), Channel 4 Corporation, Channel 5 Broadcasting Limited (a subsidiary of Paramount Global), and S4C. The relevant services they provide for the purposes of our review are each of the BBC's television broadcasting services, each Channel 3 service, Channel 4, Channel 5 and S4C (the "PSB channels").

We [published our latest assessment for 2019 – 2023](#) in December 2024 where we concluded that the PSBs had, together, fulfilled the purposes of public service broadcasting.<sup>3</sup> We also discussed the contribution that other providers made to the fulfilment of the public service broadcasting objectives over the period, including that of the commercial portfolio channels of the PSBs, television services provided by the multichannel sector, radio services, video-on-demand ("VoD") services and other online services (where there is a person with editorial control over the material on the service).

### Approach to this review

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In addition to our assessment of the PSBs' delivery of their remit, we set out in December the significant challenges to the delivery of PSM. This document considers the potential remedies to address these challenges and how PSM can be strengthened and maintained in the future. To identify the remedy options we have met with a wide range of stakeholders from across the sector, including broadcasters, producers, platforms, academics and audience groups. We set out the broad options that have been raised with us and are discussed in related publications such as the Government's [Creative Industries Sector Plan](#) and the Culture, Media and Sport Committee report into [British film and high-end TV](#).

PSM is highly valued for trusted and accurate news and informative and entertaining UK stories that reflect the diversity of the whole of the UK. The PSBs – the BBC, ITV, STV, Channel 4, Channel 5 and S4C – are the key providers of PSM and an important part of UK culture. They are universally available and required to provide trusted, accurate and duly impartial news that supports participation in democratic society and keeps audiences informed about their local areas and the world around them. The PSBs also need to provide a breadth of high-quality programmes that tell UK stories and meets the needs and interests of many different audiences. They also provide sporting and cultural programming that brings the country together and promotes a sense of shared values. In addition, they are the cornerstone of the production sector, with requirements to commission content from qualifying independent producers across the UK.

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<sup>2</sup> Our relevant legal duties are set out in [Annex 1 \(Legal Framework\)](#) to our Review of Public Service Media (2019-2023) which was published in December 2024.

<sup>3</sup> The purposes of public service television broadcasting include the provision of TV services that have a broad range of high-quality programmes and genres that meet the needs and interests of many different audiences. They are fulfilled if the public service broadcasting objectives are achieved.

Audiences also enjoy PSM content on other broadcast services, subscription video on-demand (“SVoD”) services and VSPs that offer a large range of professionally-produced and user-generated content from around the world. However, unlike the PSBs, they are not required to provide UK content or invest in production across the whole of the UK, or make the same range of content to appeal to UK audiences. In addition, their content often sits behind a paywall.

In this document, we discuss options to support the future provision of PSM content, which could be from a wide range of providers. We also discuss remedies to support the financial sustainability of PSBs as the main providers of PSM content.

## Other work related to this project

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### Media Act implementation

The Media Act 2024 (“Media Act”) is the biggest change to the public service media framework in two decades. It modernises the PSBs’ remit in terms of how their content is made available and the requirements that their content, taken as a whole, must meet. It is critical to the future of PSM and we are focussed on the delivery of the [Media Act programme](#). The recommendations we set out in this document build on our last review of PSM – Small Screen: Big Debate – and the work implementing the Media Act. They represent the next step along the path to ensuring that PSM is sustainable in the future.

The Media Act introduces a number of measures that will help to maintain and strengthen PSM:

- **Prominence on connected TVs:** new rules to help people find PSM content and ensure it is available, accessible and findable on popular connected TV platforms, such as Smart TVs (which are being brought into regulation for the first time). We are in the process of establishing new Codes, guidance and dispute resolution processes designed to ensure a fair and sustainable system that serves audiences.
- **Modernising the PSB framework:** updates the regulatory framework for PSBs set out in the Communications Act 2003 and provides them with greater flexibility as to where and how they deliver their remits and requirements. The aim of the change is to help ensure all audiences are well served, wherever they choose to consume content. One of the effects is that PSBs may, for the first time, use their on-demand services to deliver their obligations. We have so far published consultations updating our guidance on [PSBs’ statements of programme policy](#), [quotas](#) and [revised guidance for the PSBs on their commissioning codes of practice](#).
- **Radio:** the Media Act removes some of the requirements for commercial radio such as the ‘character of service’ of each service (including the types of music they play) and the provision of local material, including locally-made programming. Alongside these deregulatory changes, the Media Act also safeguards the provision of local news and information by introducing new requirements regarding the broadcasting of local news and information on local analogue commercial radio stations.<sup>4</sup> In addition, it introduces requirements on voice assistants to ensure that users can access UK radio services.

Where appropriate, we have taken the potential impact of these Media Act changes into account in our analysis and considerations in this report.

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<sup>4</sup> We recently published a consultation to implement these changes. See [Local news and information on analogue commercial radio](#).

## Future of TV distribution

We published a [report in May 2024](#) outlining how people are spending less time watching broadcast TV over DTT and that changing costs could force a tipping point within the next decade where investment in DTT cannot be sustained. We also set out three broad approaches to planning for the long-term future of broadcast TV. Government is now undertaking its own project on the future of TV distribution, looking to understand how people receive TV not only now but in the next decade. This is discussed further in Section 4.

## Periodic review and BBC Charter Review

The BBC's Mission is to act in the public interest, serving all audiences through the provision of impartial, high-quality and distinctive output and services which inform, educate, and entertain. It has five Public Purposes, which are:

- (i) to provide impartial news and information to help people understand and engage with the world around them;
- (ii) to support learning for people of all ages;
- (iii) to show the most creative, highest quality and distinctive output and services;
- (iv) to reflect, represent and serve the diverse communities of all of the United Kingdom's nations and regions and, in doing so, support the creative economy across the United Kingdom; and
- (v) to reflect the United Kingdom, its culture and values to the world.

Under the [BBC Charter and Agreement](#), Ofcom is required to *"carry out and publish two or more detailed periodic reviews on the extent to which the BBC is fulfilling its Mission and promoting each of the Public Purposes, and addressing any specific issues of concern identified by Ofcom."*<sup>5</sup>

We published our first [Periodic Review](#) of the BBC in June 2022, and we are undertaking the second review this year. We are drawing on data and information on BBC performance since our first Periodic Review and our report will form part of our input to the Government's Charter Review process. We plan to publish our report by the end of the year.

In addition, the BBC's current Charter runs until end of 2027. The Government has said that it will launch a review of the BBC Charter later this year and it will look at a range of issues to make sure the BBC truly represents and delivers for every person in the UK, including the BBC's services and their distribution. We understand the Charter Review process will include a public consultation enabling audiences and stakeholders to give their views. The future of the BBC, and its regulation, is central to the ongoing success of PSM, and we will engage with the Government on its upcoming review.

## The Online Safety Act

Ofcom was appointed the online safety regulator under the Online Safety Act 2023 ("OSA") in October 2023. The OSA makes companies that operate a wide range of online services legally responsible for keeping people, especially children, safer online. It introduces a system for

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<sup>5</sup> The BBC Charter sets out the BBC's Mission and Public Purposes. The Agreement sits alongside the Charter, setting out details on many aspects of the Charter.

categorising some regulated online services based on key characteristics, including user numbers and functionality. Some regulated services will be designated as category 1, 2A or 2B services if they meet certain thresholds. Providers of these categorised services will be required to comply with some additional duties – depending on the category they fall within.

We are taking a phased approach to implementing the OSA. Phases one and two focused on our illegal harms and protection of children duties. The third phase places additional duties on some of the largest and most widely used (designated ‘category 1’) user-to-user services to protect news publisher and journalistic content posted online, including PSB content.

Specifically, category 1 service providers must notify recognised news publishers to give them the opportunity to make representations before taking action in relation to their content. Where the content in question is also journalistic content, the service provider must explain how it took the importance of the free expression of that content into account. News publisher content is exempt from the safety duties in the OSA; in other words, online services do not have to take any action on content from recognised news publishers to meet their illegal content or protection of children duties under the OSA.

Ofcom will consult on guidance for the news publisher content duties to aid compliance, as part of our third phase of implementation of the OSA.

## Structure of the report and supporting annexes

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### The structure of this document

We have structured this report as follows.

3. Market context
4. Funding and production of PSM content
5. Supporting audiences to find PSM content
6. Empowering audiences in a digital age
7. We are committing to update our regulation of broadcast TV and radio

We are committing to update our regulation of broadcast TV and radio There are two annexes to this document:

- [Annex 1](#): PSBs in the platform era: A YouTube case study
- [Annex 2](#): Supporting content production through targeted policy measures: international case studies

# 3. Market Context

## In this section we:

- Use key data to set out how the sector and audience behaviours are changing; and
- Summarise the challenges we set out in our December publication, presenting updated analysis where available.

## Introduction

In December, we found that PSBs were delivering against their remit and audiences were generally satisfied with them. In 2024, around seven in ten (68%) PSB viewers said they were satisfied with the PSBs overall.<sup>6</sup> This has remained steady since 2021. Broadly, PSB viewers continued to say that they deliver ‘well’ across different attributes. This includes ‘programmes made for UK audiences’ (67%), ‘a wide range of different types of programmes, such as drama, comedy, entertainment or sport’ (67%) and content that ‘appeals to a wide range of different audiences’ (63%).<sup>7</sup>

While the PSBs remain valued by audiences, they face significant challenges that threaten their ability to continue delivering for audiences. This situation is not unique to the UK. PSM providers across the world are also required to produce public interest content, often with fewer resources, while facing declining revenues and increasing competition for audiences from many of the same global streaming platforms and VSPs.

In the remainder of this section we set out:

- how linear viewing and listening continues to decline as audiences are increasingly watching VSPs and SVoDs;
- that audiences are likely watching less PSM than they used to, in spite of the growth of broadcaster video on-demand (“BVOD”) services;
- the acute challenge to engage with children and younger people, who are at risk of not seeing UK content that can help them grow;
- that people are increasingly getting their news from online providers that may not be as trustworthy as PSB news;
- how the UK PSBs are adapting their strategies to put content on third-party services;
- that these market developments mean there is significant pressure on PSB commissioning budgets; and
- how changes in commissioning are impacting the UK production sector.

## Audiences are likely to be viewing less PSM

Below we set out the main trends for watching and listening to content. Our Media Nations report, which will be published later this month, covers these trends in more detail.

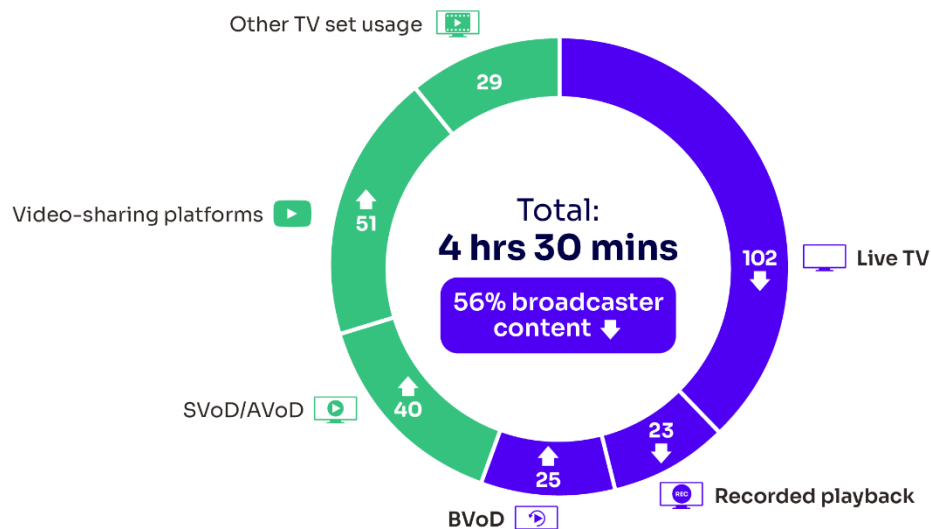
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<sup>6</sup> Ofcom Public Service Media Tracker 2024. PSB viewers are defined as adults aged 16+ who watched PSB channels or services in the past six months.

<sup>7</sup> Ofcom Public Service Media Tracker 2024.

## Viewing of online services continues to grow

Figure 1: Average daily minutes of in-home video-viewing across all devices, all individuals: 2024



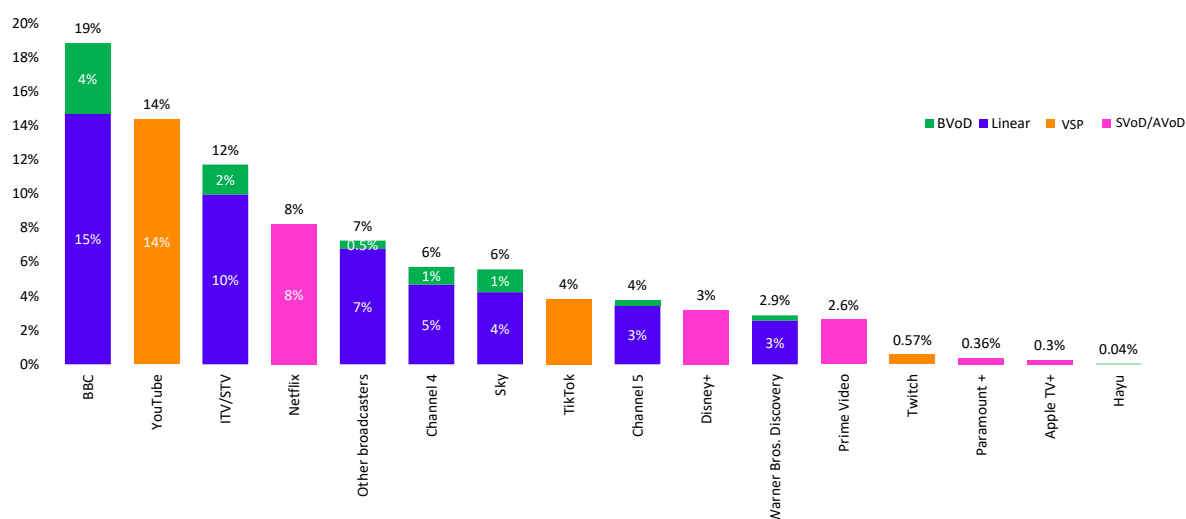
Source: Barb as-viewed on TV sets and other connected devices in the home. Arrows indicate whether viewing time for that category changed since 2023.<sup>8</sup>

Viewing on linear channels has fallen significantly in recent years and this decline is expected to continue. It now accounts for less than 40% of all in-home viewing.<sup>9</sup> As audiences move online their viewing is fragmenting to a large range of VSP, SVoD and BVoD services, resulting in viewers moving away from the PSBs, despite the significant growth in use of their BVoD services.

<sup>8</sup> 'AVoD' refers to advertising-supported video-on-demand services (e.g. Tubi). 'Content from broadcasters' includes live TV, recorded playback and BVoD. 'Other TV set usage' includes viewing of some SVoD/AVoD/VSP that cannot be definitively measured, as well as some unmeasured broadcast channels, some EPG/menu browsing, viewing when the audio is muted, piracy, unmeasured box-sets/pay-per-view content, and non-video internet activity through a PC or other device connected to the TV. 'SVoD/AVoD' excludes viewing of NOW, which is captured within BVoD along with Sky Go/Sky TV On-Demand (these two services stream the same content, so measured viewing cannot be separated).

<sup>9</sup> Barb as-viewed. 'Viewing on linear channels' here refers to viewing to channels live, at the time of broadcast (on TV sets and other devices in the home connected to the home WiFi).

**Figure 2: Proportion of total in-home video viewing by service: 2024**



Source: Barb as-viewed, all individuals.

As Figure 2 shows, although the PSBs continue to attract large shares of viewing time, other services - particularly YouTube (14%) and Netflix (8%) - also receive a significant proportion. These platforms make a significant contribution to the UK media landscape but the proportion of PSM content on these services is relatively small. As a result it is very likely that UK viewers are consuming less PSM.

This means that people are less likely to see content that reflects the whole of the UK and can bring the country together. They are also less likely to be seeing trusted and accurate news that is regularly scheduled and therefore more easily found on linear TV. Viewing a smaller volume of PSB content also means audiences are less likely to be consuming a breadth of genres.

Competition for audiences and advertising revenue puts pressure on PSBs' ability to maintain volumes of new programming, affecting some genres more than others. While the PSBs continue to deliver significant volumes of first-run news and current affairs, new programming for many specialist genres has been declining. This is particularly the case for arts and classical music (hours of which have declined by 55% between 2014 and 2024), children's (43%) and comedy (39%).<sup>10</sup>

## Viewing to SVoD services is continuing to increase

Currently SVoD services account for 15% of in-home viewing time. We said in December that SVoD viewing was expected to slow, following a number of years of significant growth. So far in 2025 the number of households with SVoD subscriptions has plateaued,<sup>11</sup> but viewing time has continued to increase.<sup>12</sup>

SVoDs generally charge subscription fees, but several also sell advertising, with premium subscription packages, sometimes allowing users to opt out of viewing ads. Some of the SVoDs have complementary products which allow them to bundle their audiovisual content services with other products. For example, Apple bundles Apple TV+ with the purchase of an Apple device. Access to Amazon Prime Video content is included as part of an Amazon Prime membership.

The vast majority of SVoD services like Netflix, Disney+ and Apple TV+ have significant global audiences. They have substantial content budgets as they can recover their investment globally and

<sup>10</sup> Ofcom/broadcasters. Figures exclude BBC ALBA and programming for the nations and regions.

<sup>11</sup> Barb Establishment Survey up to Q1 2025. The proportion of households with SVoDs has remained at the same level (68%) in three of the last four quarters.

<sup>12</sup> Barb as-viewed.



this allows them to invest in high-quality content with international appeal such as *Squid Game* and *Lupin*.<sup>13</sup> They have also invested significantly in UK productions, some of which tell UK stories which also have international appeal (such as Netflix's *Toxic Town*, Amazon Prime Video's *Clarkson's Farm* and Disney+'s revamp of *Blind Date*). The global scale of the SVoDs also allows them to invest in technical development of their services, providing audiences with personalised content recommendations. Our research shows audiences mostly watch drama, films, children's content and entertainment on SVoDs.

SVoD services also do not offer the same volume of UK content as the PSBs and have historically focussed on a limited number of genres, though some are starting to broaden their offerings, including through partnerships. Both Netflix and Amazon Prime Video have been acquiring sports rights – Netflix with WWE and some NFL games and Amazon has had English Premier League rights and now has Champions League football. Some SVoDs have also been partnering with content creators popular on VSPs, for example, Mr Beast with Amazon and Netflix with children's content creator Ms Rachel.

### VSP viewing has grown fast – particularly on TV sets

VSPs have been one of the fastest growing forms of viewing in recent years with YouTube leading the way. In 2024, 60% of all individuals viewed YouTube videos over their home broadband connection. Recent growth was driven by viewing on connected TVs with 42% of in-home YouTube viewing on the TV set (up from 34% in 2023) now that more than seven in ten households have connected TVs.<sup>14</sup> Older audiences are also increasingly turning to YouTube, for example 75 year-olds and over now watch an average of ten minutes of YouTube a day (an increase of 46% since 2022).<sup>15</sup>

Unlike SVoDs, VSPs rely on content uploaded onto the platform by others – including digital-only content creators such as influencers, podcasters and digital studios, as well as music videos, broadcasters including the UK PSBs and non-media organisations such as universities. The most used VSP, YouTube, has an unparalleled breadth and volume of content from the UK and around the world. VSPs are funded by advertising and YouTube also has a subscription ad-free tier.

There is limited publicly available data on what people are watching on YouTube. We have done some analysis – summarised in [Annex 1](#) – that provides an indicative view. This suggests that most viewing (about two thirds) goes to content published by 'digital native' creators, that is sources other than TV broadcasters, film or TV studios and distributors, or music labels. These include influencers, podcasters and entertainment channels in a variety of genres such as 'gaming,' 'unboxing' and 'reacts'.

Only about a fifth of the time spent by UK-based YouTube users goes to UK-originated content, while over half goes to content from North America. However, YouTube – along with other online platforms – is also helping UK content creators reach new audiences, including internationally. For example, the UK media company Goalhanger has an [increasing US audience for its podcasts](#) such as *The Rest Is History*.

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<sup>13</sup> For example, [Netflix](#) has said that it expects to spend around \$18bn (£13bn) on original and licensed programming in 2025, [Disney](#) has said that it expects to spend \$23bn (£17bn) on content in its 2025 financial year (although a significant portion of this goes on US sports rights) and [Apple](#) has reportedly been spending around \$5bn (c.£3.5bn) a year on programming for Apple TV+.

<sup>14</sup> [Ofcom Technology Tracker 2025](#). Figure has been rebased out of all households as it was only asked of those who have a TV set and internet access at home.

<sup>15</sup> Barb as-viewed. Reach criteria: 3+ consecutive minutes of YouTube watched in the home on a connected device, per week.



There are a variety of ways in which audiences discover content on YouTube. Our analysis suggests that one in two in-browser visits to a YouTube video are preceded by another YouTube video, which could be driven by people clicking the recommendations from YouTube's Up Next feature.

YouTube's homepage is the next most significant driver of user behaviour, which preceded around 15% of videos.<sup>16</sup> This suggests that the content people watch on YouTube is driven primarily by YouTube's recommendations. According to YouTube, its recommender system is constantly evolving based on signals such as watch history, search history, subscriptions, likes, dislikes, "not interested" and "don't recommend channel" feedback selections, and satisfaction surveys.

## Audiences also watch content on social media

Audiences also spend time watching video content on social media, particularly younger people.<sup>17</sup> For example, Facebook/Messenger reached 93% of UK online adults in May 2025 and was used an average of 39 minutes per day. Instagram reached 78% of UK adults in May 2025, with UK internet users spending an average of 20 minutes a day on it. The amount of time spent on these services varies by age. For example, UK Instagram users aged 18 – 24 spent 40 minutes a day on Instagram compared to six minutes a day for those 65 and over. Snapchat (18-24: 73% reach, average 48 minutes a day) and TikTok (18-24: 81% reach, average 62 minutes per day) are also heavily used by young people.<sup>18</sup>

## Radio and audio services are also moving online but at a slower rate

Audio content is very popular among audiences, with [93% of people listening](#) to some form of audio content each week.<sup>19</sup> Radio listening remains popular, with the latest RAJAR figures putting weekly reach at 87% of UK adults,<sup>20</sup> but a large proportion of people are also listening to newer forms of audio. For example, Ofcom research shows that as many people now listen to music streaming services such as Spotify and Amazon Music each week (61%) as they do to music radio (62%), with young people more than twice as likely to listen to these services as those aged 55 and older.<sup>21</sup> Radio listening itself is also increasingly happening online – analogue and DAB radio sets still account for the majority of radio listening (69%) but online listening through smart speakers and other devices (28%) has been slowly increasing (up six percentage points in the last three years). Smart speakers alone accounted for just under a fifth of radio listening in Q1 2025 (18%).<sup>22</sup>

The BBC is the only PSB that provides radio stations for audiences, however other PSBs provide podcasts (as well as the BBC). Commercial radio also offers a range of music and speech services, while community radio provides services in specific areas or communities. Audiences also widely listen to other (generally unregulated) sources, like podcasts from a range of other providers.

VSPs also play an increasingly significant role in listening to audio content with YouTube the most listened-to online audio service, followed by Spotify. BBC Sounds is the fourth most listened-to

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<sup>16</sup> Ofcom analysis of Ipsos Iris clickstream data, 15th January to 15th February 2025. UK 15+ Base of 7,828 panellists. Data covers in-browser activity only (not TV or other app usage). This analysis is limited to how YouTube videos are discovered on web browsers. We recognise that 41% of YouTube's in-home UK viewing is on TV sets. See Annex 1 for further detail.

<sup>17</sup> Viewing of videos on social media sites mentioned in this paragraph are not included in Barb measurement and are therefore not included within the total in-home video viewing figures referred to earlier in figure 1.

<sup>18</sup> Ipsos Iris, 18+, 18-24 and 65+ samples used, May 2025.

<sup>19</sup> [Ofcom's Audio Listening in the UK Report: 2025](#), p4.

<sup>20</sup> RAJAR Q1 2025.

<sup>21</sup> Ofcom Audio Survey 2025.

<sup>22</sup> RAJAR Q1 2025.

service. [Audiences are using YouTube](#) for music videos as background listening, online music and podcasts. They are also using YouTube to watch podcasts – nearly 30% of people who consume podcasts prefer to do so with video.<sup>23</sup>

## The PSBs are evolving their strategies

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The PSBs are continuing to develop their BVoD offerings to increase personalisation and help audiences discover content. They are increasing the volume of content on their players and in some cases adding to the number of live channels audiences can access on them. Many PSBs are also shifting their commissioning strategies to target genres that are successful on streaming services (for example premium dramas and entertainment shows) and high impact content to entice viewers to their BVoD players.

In order to reach all audiences the PSBs are increasingly putting content on third-party platforms like YouTube. As discussed in [Annex 1](#), the PSBs initially used VSPs like YouTube to show promotional clips of their linear or BVoD content with a view to driving audiences back to these services. However, in recent years, Channel 4 has begun to place full-length episodes on the platform (Channel 4's full episode views grew 169% to 110 million [in 2024](#)),<sup>24</sup> which ITV has recently begun trialling as well. Channel 4 commissions content for digital platforms and both Channel 4 and ITV have in-house agencies that create content specifically for their own players and for VSPs.

The PSBs often use different strategies for specific genres. For example, they tailor their news content to different audiences and platforms and put clips and compilations of key sporting moments, like goals, on platforms like YouTube, TikTok and Instagram. The BBC is developing its strategy for children's content, to include videos made specifically for YouTube as well as a series of live channels on the platform. Most of the PSBs also have strategies for engaging with younger audiences on TikTok and social media platforms, although this tends to be more short form and promotional content. For example, on TikTok the BBC had [viral clips featuring Sabrina Carpenter and Tony Bellew](#) while Channel 4's teaser trailer for *Married at First Sight UK* [gained 14.5 million UK views](#).

As discussed in Section 5, the PSBs' strategies for engaging with audiences on third-party services are evolving and will continue to change as they learn more about audience expectations on platforms such as YouTube and TikTok.

## Young people may not form a connection with the PSBs

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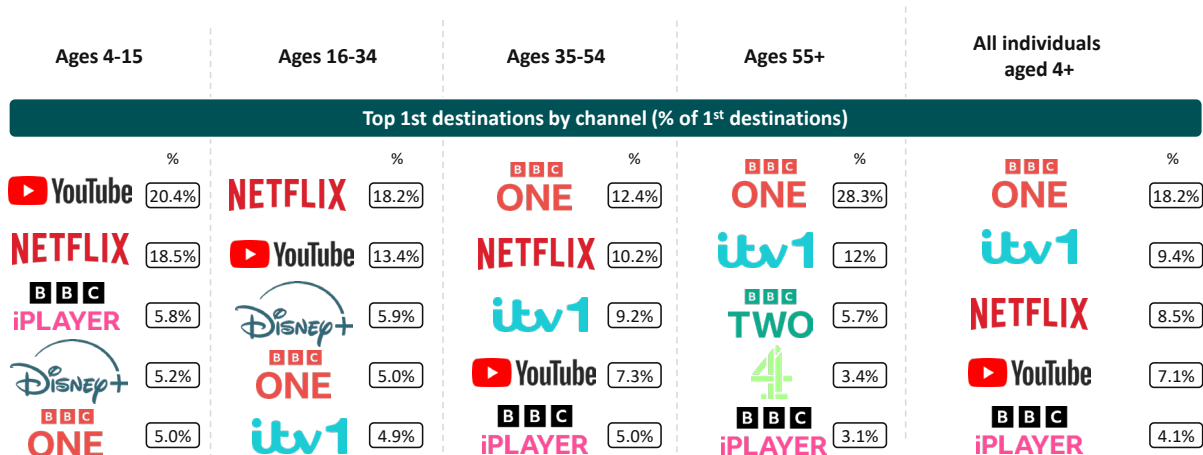
As discussed in December, the viewing habits of younger people differ significantly from older age groups. As Figure 3 below shows, these groups also differ in terms of where they first look for content. YouTube and Netflix are popular first destinations for children (4-15) and younger people (16-34) whereas people aged 35+ are more likely to start their viewing journeys with BBC One.

**Figure 3: First destinations for viewing by channel/service, November 2024**

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<sup>23</sup> A more in depth discussion of podcasts can be found in our [Audio Listening in the UK](#) report.

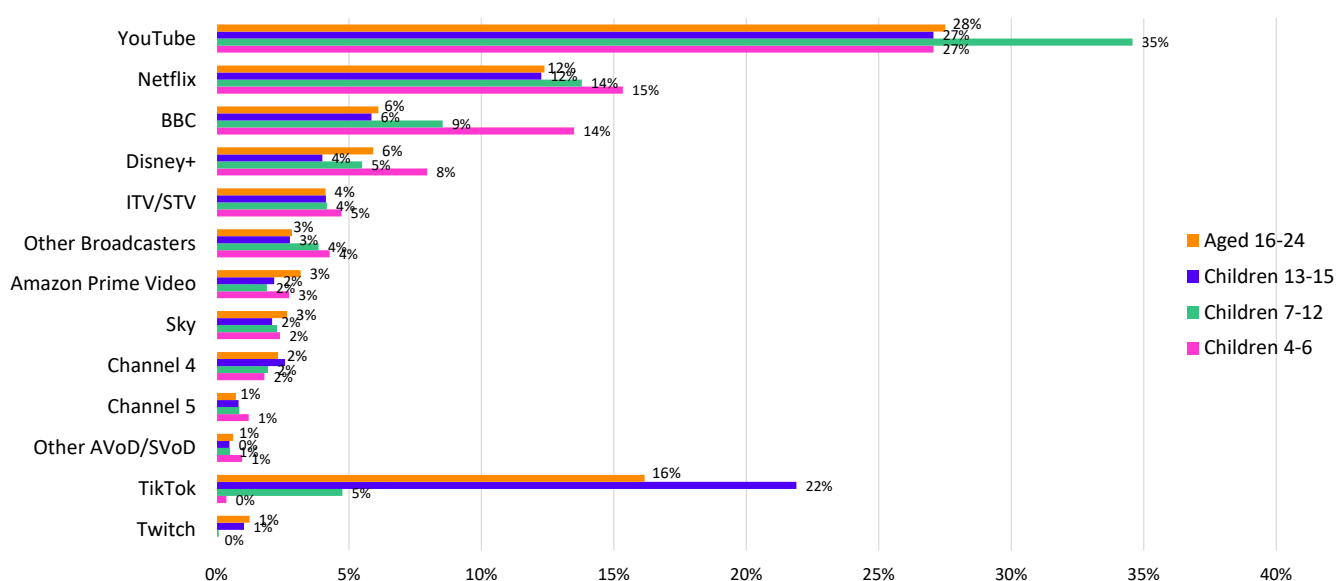
<sup>24</sup> [Channel Four Television Corporation Report and Financial Statements 2024](#), p.11.



Source: Ofcom/TRP TV Viewer Journeys

Children and young people spend less time viewing broadcasters' services than any other age group. Today's 4-6-year-olds spend a larger proportion of their in-home viewing on YouTube (27%) than they do on all PSB services combined (21%). These patterns intensify with children's age: 7-12-year-olds spend over a third of their in-home viewing time (35%) on YouTube and 13-15-year-olds spend nearly half (49%) on YouTube and TikTok. Streaming services like Netflix and Disney+ also perform well among children, with those aged 4-6 spending as much of their viewing time on Netflix (15%) as they do on BBC services (14%).

**Figure 4: Share of in-home viewing by age group and provider: 2024**



Source: Barb as-viewed. Calculated from the minutes viewed to each service out of total in-home video viewing (including unidentified viewing), across TV sets and all devices connected to the home broadband.

We do not have a comprehensive understanding of what content is served to children on VSPs like YouTube and what they choose to watch – including how frequently they discover and view content from UK PSBs. However, the likelihood is that much of their viewing is not PSB content.<sup>25</sup> Young

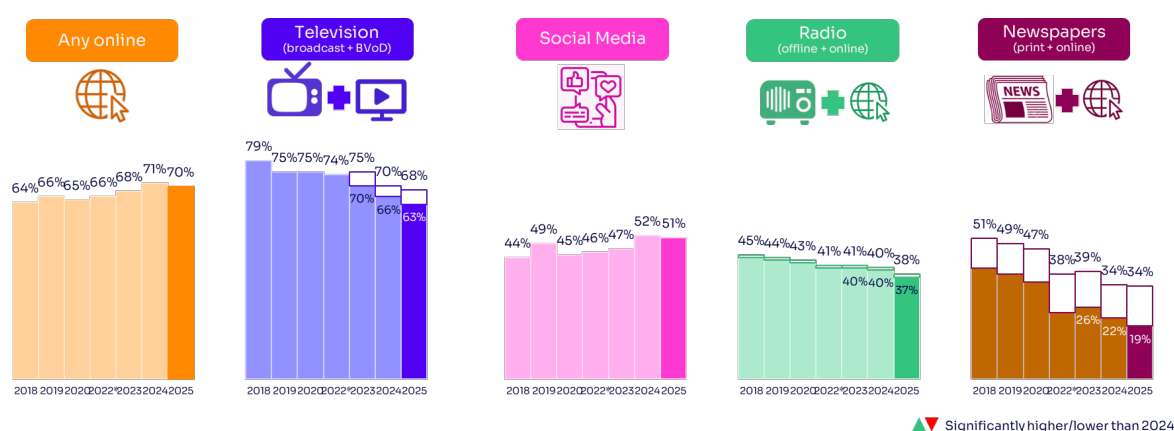
<sup>25</sup> Quantitative research for our [Children and Parents: Media Use and Attitudes Report](#) provides further indications about children's viewing. For example, we know that funny videos or those involving pranks or

people’s current viewing and listening habits are a risk for the PSBs and the overall aims of PSM in the longer term if they do not gravitate to PSB services as they get older.

## Audiences are embracing online news

News and current affairs play a vital role in facilitating civic understanding and offering the public fair and well-informed debate. A plural, trustworthy news sector is an essential component of a well-functioning democracy. The UK has a wealth of news and media organisations providing high-quality news across TV, radio, online, podcasts and print. We set out sectoral trends relevant to PSM here and our annual overview of news consumption in the UK explores these and other issues in more detail.

**Figure 5: Use of different platforms for news**



Source: Ofcom News Consumption Survey 2025<sup>26</sup>

Consistent with wider trends, audiences are turning to online services for their news. Seven in ten adults say they consume news online and much of this is through online intermediaries like social media (51%), search engines (28%) and news aggregators (15%). Meta continues to be the most used online intermediary (39%) with Facebook the most commonly used individual service (30%) and TikTok the fastest growing (11% up from 1% in 2020). Among audiences that directly access websites and apps of news organisations for their news, the most used is BBC News (59%), followed by Sky News (21%) and The Guardian (20%).

Broadcast TV news viewing continues to decline (63% down from 66% last year) but remains important for many, particularly older audiences. The PSBs continue to play a key role in peoples’ news consumption, with 74% of adults claiming to use at least one PSB news service (although this is slowly declining). The BBC is the most used broadcast news provider reaching two thirds of UK adults, followed by ITV (34%).<sup>27</sup>

challenges are the most popular type of videos with children, especially with older children. The second most popular type of content – cartoons, animations, mini-videos and songs – are especially popular with younger age groups.

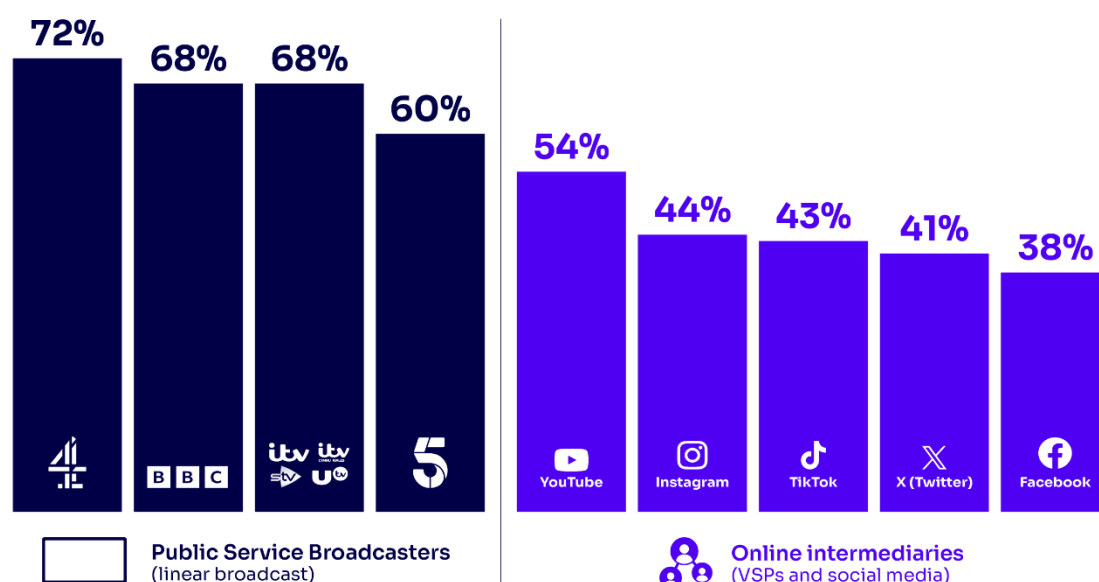
<sup>26</sup> Question: C1. Which of the following platforms do you use for news nowadays? Base: All Adults 16+ 2025=4573, 2024=5466, 2023=4556, 2022 W2\*=2792, 2020=4576, 2019=4691, 2018=4618 \*2022 W1, and 2021, data not shown because face-to-face fieldwork was not possible during Covid-19 pandemic. ‘Online’ Includes use of social media, podcasts and other websites/apps accessed via any device. BVoD added in 2023.

<sup>27</sup> Ofcom News Consumption Survey 2025.

## PSBs remain the most trusted sources of news

While audiences are increasingly using online platforms to consume news, including social media, they typically rate these services lower than the broadcast channels' news on a number of attributes.<sup>28</sup> Under half of those who regularly use social media for news score it highly for accuracy (43%), trustworthiness (44%) and impartiality (44%). In contrast the PSBs have significantly higher levels of trust in their broadcast news – 68% for regular viewers of BBC, and similar for regular viewers of the other main TV news providers – ITV (68%), Sky (67%), Channel 4 (72%), and Channel 5 (60%).<sup>29</sup> Audiences continue to see high quality news as important, with 49% of UK adults ranking the provision of 'trusted and accurate UK news' in their three most important attributes for PSBs to deliver to society overall.<sup>30</sup>

**Figure 6: Regular users of PSB channels and online intermediaries who rated them highly (7-10 range) for trust, 2025**



Source: Ofcom News Consumption Survey 2025.<sup>31</sup>

Local news is also valued for its trust and accuracy. Almost all adults (93%) claim to use local news or information. TV, radio, printed sources and local newspaper websites were all seen as generally trustworthy and accurate by 80-90% of users, while local news on social media and messaging apps were trusted by around 60% of users, rising to 71% for search engines.<sup>32</sup>

<sup>28</sup> When taken as an average across all online services.

<sup>29</sup> Ofcom News Consumption Survey 2025. It should be noted that PSB news content is also available on social media services and these ratings demonstrate the challenges in assessing attributes of individual news providers on social media because they can be lost in the vast range of other, unregulated content.

<sup>30</sup> Ofcom PSM Tracker 2023. Note this question was asked of all respondents who completed the survey online, excluding those who completed it over the phone.

<sup>31</sup> Question: E3. And to what extent do you think the following statements apply to <BRAND> as a news source? Answer using a scale of 1 to 10 Base: All adults 16+ using each source for news at least once a week 2025: BBC TV=2314, ITV=1320, Channel 4=512, Channel 5=236, YouTube=871, Instagram=783, TikTok=494, X=622, Facebook=1376.

<sup>32</sup> Ofcom Local News and Media Survey 2025.

However, our [Local Media Review](#) found that challenges facing local news are similar to the news sector more generally. They include audiences migrating from print and TV news sources to online ones, the concurrent fall in advertising revenues, and the growing role of online intermediaries in the news value chain. We also found competition online for the attention of audiences who are largely unwilling to pay for news, alongside rising numbers of people disengaging from, or actively avoiding, news more widely.

There is growing awareness and use of AI tools by news audiences, but levels of trust in the technology are currently low. Around three in ten adults (31%) now report having used AI tools such as ChatGPT and Gemini, compared to less than a quarter (23%) in 2023.<sup>33</sup> [Other research](#) has found that 37% of respondents said they would consider using generative AI search tools to summarise top news stories.<sup>34</sup> However, earlier this year the BBC published [research on the accuracy of AI chatbots for digesting and summarising its news content](#) and claims to have found “significant inaccuracies” in the resulting answers.

## The PSBs are evolving their news strategies

The PSBs have been putting news on social media and VSPs for a number of years – for example, PSB news services have been present on YouTube for more than a decade. Over the last few years, they have been successful in [getting more engagement on VSPs](#) and social media and have been experimenting with creating content specifically for these audiences, including by trialling different formats and length of the news stories and where they distribute it.

The BBC is a globally recognised news brand that has been successful in gaining millions of global subscribers and followers to its news pages on many VSP and social media services. It has also [committed](#) to expanding its news presence on YouTube, TikTok and Instagram platforms this year as well as investing further in its vertical and short-form video capabilities.

ITV has significantly increased the content it puts on YouTube Shorts this year to improve engagement with different age groups. TikTok was the fastest-growing platform for [Channel 4 News in 2024](#), with more than one billion total views globally.<sup>35</sup> [Channel 4 highlighted](#) its focus on investing in “innovative storytelling formats that meet Gen Z where they are” while “upholding accuracy and due impartiality.”<sup>36</sup>

## PSBs are finding it much harder to fund the production and distribution of high-quality UK content

The future delivery of PSM depends on stable and adequate funding. In the UK, the current system of financial support for the creation and universal distribution of PSM is centred around the PSBs, supported by the TV Licence fee, advertising revenue, DTT licences and prominence on electronic programme guides (“EPGs”). We expect the new Media Act prominence provisions for PSB BVoD services on connected TVs and other devices to have tangible benefits for the discoverability of PSB content, but it has not yet been fully implemented.<sup>37</sup> The production of TV and film content is also

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<sup>33</sup> Ofcom [Adults' Media Use and Attitudes 2025](#)

<sup>34</sup> Thinks Insight & Strategy for the Digital Regulation Cooperation Forum (DRCF), 2025. [Understanding Consumer Use of Generative AI](#).

<sup>35</sup> [Channel Four Television Corporation Report and Financial Statements 2024](#)

<sup>36</sup> Channel 4, 2025. [Gen Z: Trends, Truth and trust](#).

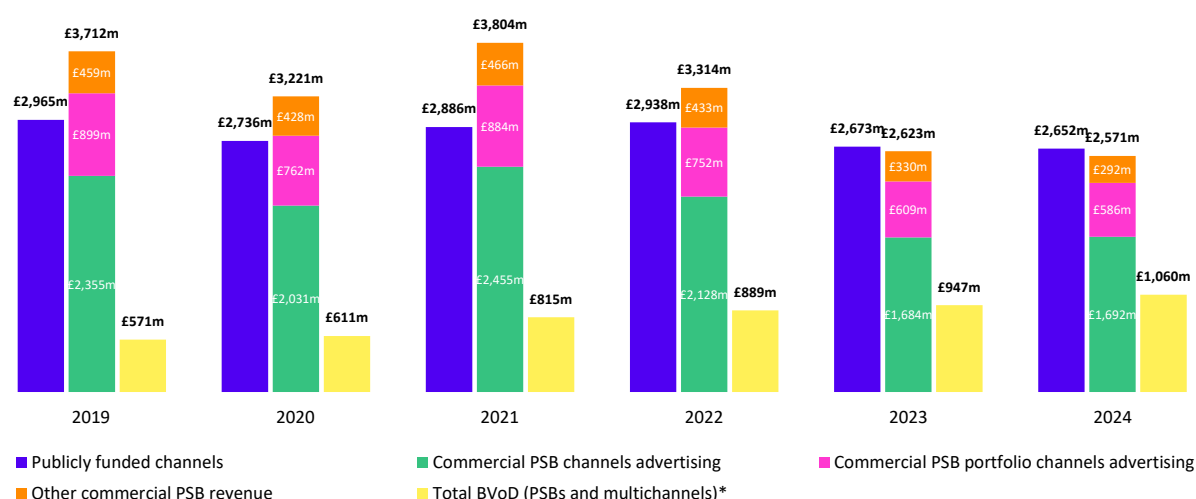
<sup>37</sup> See [Media Act Implementation](#) for timetable and progress.

supported by a system of tax credits which incentivise the production of content that reflects UK culture and supports the growth of the audiovisual (“AV”) sectors in the UK.

## PSB revenues are under significant strain

PSB revenues have declined significantly in real terms over the last decade, as shown in Figure 7. Public TV Licence fee funding<sup>38</sup> fell to £2.7bn in 2024, having reduced by more than £300m in real terms since 2019 (-11%) and by £1bn (-28%) since 2014. Linear TV advertising revenues on commercial PSB main and portfolio channels have reduced by close to £1bn (-30%) in real terms since 2019 (down £1.5bn, or 39%, since 2014), falling to £2.3bn in 2024. While BVoD advertising revenues have grown, they have not compensated for this decline – total BVoD revenues (including multichannels, although the PSBs account for the large majority) increased by around £500m in real terms between 2019 and 2024, to £1.1bn, leaving a notable shortfall.

**Figure 7: PSB TV revenues by type, and total BVoD revenues: 2019-2024**



Source: Ofcom/broadcasters.<sup>39</sup>

## Monetisation and attribution is difficult on third-party platforms

To reach all audiences, PSBs are putting more content on third-party platforms. Even though views on social platforms exceed BVoD programme requests, our evidence suggests the average value of a social media or VSP view is much lower than BVoD.<sup>40</sup> This highlights the challenge for commercial PSBs in monetising content on third-party platforms. [ITV](#) and [Channel 4](#) have also become official ad-sales partners to YouTube, allowing them to sell their own YouTube channel inventory at a preferable revenue share rate.

<sup>38</sup> TV Licence fee revenue allocated to TV services based on Ofcom analysis of BBC data. The BBC [reported](#) total TV Licence fee income of £3.8bn in its 2024/5 financial year.

<sup>39</sup> Figures are presented in real terms (CPI-adjusted to account for inflation). TV Licence fee revenue is allocated to publicly funded channels based on Ofcom analysis of BBC data. \*PSBs account for the large majority of BVoD. BVoD revenue is predominantly advertising but also includes some other elements, such as subscription revenue. ‘Other’ revenue includes sponsorship, product placement, subscriber income, TV shopping, interactive services, programme sales, pay-per-view (PPV) and other sources. ‘Commercial PSB channels’ comprises the following: ITV, STV, ITV Breakfast, Channel 4, Channel 5 and S4C.

<sup>40</sup> Confidential data collected from the PSBs.



When viewing PSB content on third-party platforms, there is a risk that audiences do not realise who commissioned the content. By placing their content on a third-party platform the PSB brand may be lost underneath that of the host. This is a particular issue for the BBC, who consider viewers need to attribute the content to the BBC so they understand the value it provides and to support payment of the Licence fee.

## **At the same time, PSBs are facing increased costs**

The PSBs face the costs of investing in their own BVoD platforms and creating new content that will be successful at attracting audiences to their services. They also need to find ways to reach audiences on third-party platforms, including commissioning different types of content to engage with audiences on these services, while continuing to bear all of the costs of running linear TV channels.

Several stakeholders have told us that the cost of making and commissioning content has increased, especially with regard to premium scripted content. This may have been influenced by the rise in investment from international commissioners leading to high demand for talent and resources, along with the PSBs increasing the production values of their content to compete.

As we noted in December, it is possible that the integration of AI across the supply chain could result in some cost savings for broadcasters. In a [recent Pact survey](#), 57% of production companies said they are already using AI or plan to use AI in the near future in their production process. The industry is in the early stages of using this technology and it is difficult to predict the likely scale of any cost reductions.

## **PSBs have responded to financial challenges by changing the way they commission content**

Financial challenges have seen the PSBs struggle to maintain levels of investment in original UK content. In real terms, their direct spend on first-run originations fell to £2.8bn in 2024, compared to a CPI-adjusted £3.5bn peak in 2016. Declines in PSB first-run spend have been offset to an extent by contributions from third-party funding, which amounted to close to £700m in 2024.<sup>41</sup> This puts total investment in first-run UK originations at £3.5bn in 2024, compared to a CPI-adjusted £3.9bn in 2016. Two thirds (65%) of third-party funding was for drama productions in 2024, but it also supports certain types of PSB programming across a range of genres.<sup>42</sup> However, there are more limited alternative financing options for UK content that has less international appeal.

PSBs have also been changing the type of content they commission, shifting investment budgets to fewer productions with higher impact to attract viewers to their BVoD services. This has been at the expense of some mid-value programmes like soaps and continuing drama. Pact's [Changing UK Content Investment report](#) suggests that mid-value commissions are declining, as spend becomes more polarised between higher and lower budget productions.

It is part of the PSBs' obligations to provide a broad range of content, and our December report reflected that they had collectively delivered their purposes and objectives across the review period.

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<sup>41</sup> This includes co-productions, distribution advances, loans and public sources, notably tax credits and funding from public bodies (for example, screen agencies and public bodies such as the BFI support productions across the UK, and schemes such as the UK Global Screen Fund support UK producers to access international funding).

<sup>42</sup> Ofcom/broadcasters.



However, there has been a reduction in hours of specialist genres, including specialist factual, arts and classical music, and children's.

There is particular pressure on the production of content that is less commercially viable, such as children's and news. Both genres attract less advertising revenue – for example, children's TV has additional advertising restrictions. Secondary rights can also be less valuable for these genres – particularly for news (when it is often out of date after broadcast) and culturally specific children's content (although less so for animation). Recent events have underscored the financial challenges in commissioning content. For example, [Sky](#) has said it will no longer commission original children's programming and the Culture, Media and Sport Committee has announced an [inquiry into the future provision of UK children's TV](#).

### **Third-party funding may not continue to offset lower PSB budgets**

The PSBs are finding it harder to make up content budget deficits in a more challenging and risk-averse global market. The PSBs have told us that a number of UK-focussed dramas are being approved for commissioning but cannot proceed because required third-party funding from international finance and pre-sales is not sufficient, itself an increasing reflection of the disruption of viewing and advertising markets globally, particularly in the US. This is evidenced by a plateauing of such contributions to PSB originations, which in real terms decreased 2% year-on-year to £677m in 2024.<sup>43</sup> Greater risk-aversion is also reflected in the increasing share of UK commissions that are renewals rather than new shows.<sup>44</sup>

There are mixed views on the health of the co-commissioning market. A report for , the Association for Commercial Broadcasters and On-Demand Services (COBA) on Co-commissioning Trends suggested that total PSB scripted co-productions with US streamers and US studios (qualifying for high-end TV tax credits) are down from a peak of 35 in 2019 but increased by 40% from 2023 to 2024 (from 19 to 27 productions).<sup>45</sup> However, these figures may not fully reflect recent pressures which are impacting current commissioning. The BBC and Channel 4 have said that they are now doing fewer co-commissions with the global streamers and other former co-production partners who are competing with them for UK audiences, content rights and creative talent.

### **Funding arrangements bring certain risks for the creation of UK-relevant content**

While third-party funding supports PSBs and audiences to access higher cost programming, the PSBs have said that reliance on international funding puts them at the mercy of the business models and decisions of large international companies who do not have the same public service objectives. Producers have also said it can be more challenging to make money, at least in the short term, on culturally relevant UK content with less international appeal. In addition, where programmes are deficit funded, producers generally need to wait until the distributor has recouped its investment

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<sup>43</sup> Source: Ofcom/broadcasters.

<sup>44</sup> See Ampere Analysis report for ScreenSkills and 4Skills, 2025. [Sizing up: workforce composition and capacity in the screen industries. An Ampere Analysis report for ScreenSkills and 4Skills](#), p. 29. The report showed that first-run UK TV commissions declined from 61% in 2020 to 52% in 2024; renewals of existing series increased from 37% in 2020 to 40% in 2024; and film commissions increased from 3% in 2020 to 8% in 2024.

<sup>45</sup> A report for COBA by Ben Keen based on BFI data, 2025. [Co-commissioning Trends in UK High-End TV](#). The report also showed that scripted co-commissions with European groups were down by 50% from 8 in 2023 to 4 in 2024, though this is up from 2 in 2019.

from future secondary sales before they earn any profit from their IP.<sup>46</sup> These types of deals can put a particular strain on smaller producers who, compared with large producers, may have less access to capital and assets (such as IP) and less experience in making complex financial deals. Given the budgetary pressures facing both PSBs and producers, reliance on third-party funding could create the risk that content is less UK-relevant or less likely to feature new talent and ideas, as content is developed with an eye to international and established tastes.

## Budgetary pressures and changing commissioning patterns are reshaping the UK production sector

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To provide PSM content, the PSBs rely on a diverse and resilient production sector. The PSBs' scale and breadth of commissioning has underpinned the development of a thriving UK sector, featuring businesses that vary significantly in size and focus.<sup>47</sup> However, the sector is now experiencing a turbulent period as it adapts to the financial challenges facing the PSBs, changing demand from audiences and commissioners, and increased content production costs.

### The sector has become more reliant on potentially unpredictable investment sources

While PSBs remain the biggest contributors to independent producers' primary commissioning revenues, this share has declined over time due to significant growth in inward investment from international companies, including SVoD services. The PSBs accounted for 51% of commissioning revenues in 2023 (down from 65% in 2013), while international providers accounted for 39% (up from 15% in 2013). Overall, independent producers' primary commissioning revenues increased by 12% in real terms from 2013 to 2023. However, there was an 18% [decline in real terms from 2022 to 2023](#) – and early high-level data from Pact's 2025 Census shows there was a further, albeit smaller, decrease of 4% from 2023 to 2024.<sup>48</sup>

Investment from global providers has created significant opportunities for UK talent and businesses. [Inward investment has fluctuated](#) in recent years but remains substantial: 2021-22 saw a boom in production spend after the Covid-19 pandemic followed by a decline in 2023.<sup>49</sup> This reflected a combination of factors including a market downturn following the two-year post-Covid bounce-back and the impact of the writers' and actors' strikes in Hollywood. It contributed to [more freelancers being out of work](#) and demonstrated the significant impact that international events can have on the UK sector. Inward investment in high-end TV has since rebounded to some extent<sup>50</sup> but if PSB

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<sup>46</sup> Producers often take advances from distributors to make up programme budgets and generally benefit from secondary sales once the initial investment has been repaid, sharing the residual payments with distributors and, in some cases, PSBs (as well as directors and other talent).

<sup>47</sup> The sector includes a small number of large broadcaster studios and super-indies and a long tail of smaller, often more specialised independent production companies.

<sup>48</sup> Pact UK Television Production Census, Oliver & Ohlbaum analysis. Revenue has been adjusted for CPI at 2024 prices. Pact's data represents revenues to producers not wholly owned by PSBs. The Pact Census collects financial information from participating producers via a survey, which is stated to represent around 80%-90% of total industry revenue.

<sup>49</sup> Inward investment in high-end TV was £4.43 billion in 2022 and down 49% to £2.25 billion in 2023. See British Film Institute, 2025. [Film and high-end television programme production in the UK, 2024](#), p.7.

<sup>50</sup> Up 25% in 2024 to £2.82 billion. British Film Institute, 2025. [Film and high-end television programme production in the UK, 2024](#), p.7.

budgets continue to decline, the sector may rely even more on potentially volatile sources of investment.

## Changing commissioning patterns are having a pronounced impact on certain producers

We understand that the shifts in commissioning towards fewer, high-impact programmes are having a particular effect on smaller and mid-sized independent producers (many of which are based in the nations and regions) and those working in certain genres (including at-risk genres), who are more likely to rely on PSB commissions. Broadcasters and producers have told us that there is overcapacity among smaller production companies, who are more likely to work in genres with declining demand, and that the market is now experiencing a ‘correction’ phase. While many producers are looking to diversify,<sup>51</sup> some well-established, smaller independent production companies have closed, merged with other companies, or are facing challenging circumstances.<sup>52</sup>

Data suggests that workforce supply outstrips demand in many fields within the production sector: the UK screen workforce was at 60% capacity (% of available workers who are engaged on a project) in 2023-2024 down from 80%-90% in 2022, according to the ScreenSkills and 4Skills Sizing Up report.<sup>53</sup> We have heard that some [freelancers are leaving the industry](#) and that the fall in work may have a heightened impact on those from certain backgrounds, including those with fewer financial resources to absorb shocks in income.

## Commissioning shifts present challenges for producing PSM content across the UK

Ongoing financial challenges for the PSBs and evolving audience demands may further impact the composition of the production sector. To date, PSBs have produced a broad range of content, providing a ‘development ladder’ for people and businesses working in production to progress from lower to higher budget commissions. However, mid-value commissions (such as continuing drama and daytime shows) look set to continue to decline. These commissions have provided work for smaller to mid-sized production companies (particularly outside London), acted as a training ground for the sector, and introduced new talent and ideas to UK audiences.<sup>54</sup> More broadly, commissioning changes across the industry have contributed to skills shortages in certain roles and at mid-to-senior levels, which continue to persist, despite some other sections of the workforce struggling to find work.

Different nations and regions are facing specific challenges from the shifts in commissioning related to their workforce composition and genre specialisms. For example a recent report found that

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<sup>51</sup> For example, Pact’s [Changing UK Content Investment report](#) found that scripted producers were particularly looking at international opportunities (80%) while unscripted respondents were particularly looking at new genres (47%) and considering branded content (53%). p.57.

<sup>52</sup> Examples include RDF Television, Endor Productions, Euston Films and ZigZag Productions.

<sup>53</sup> See [Sizing Up report for ScreenSkills and 4Skills](#), p.36.

<sup>54</sup> For example, stakeholders have recently commented on the planned closure by the BBC of the continuing drama River City and stated it was a training ground for developing talent in Scotland. See for example, March 18 2025 [statement](#) by Bectu and the Official [report](#) of the Scottish Parliament’s Constitution, Europe, External Affairs and Culture Committee meeting of May 15 2025.

workforces in Scotland and the South West skew towards unscripted and children's TV projects and so the decline in commissioning in these genres has had a particular impact in those locations.<sup>55</sup>

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.<sup>56</sup> 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 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.

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<sup>55</sup> The [Sizing Up Report for ScreenSkills and 4Skills](#) states that these shortages are a result of two factors: rapid hiring and promotions during the post-COVID production boom, and a high degree of workforce specialisation meaning that certain genres and content types still encounter high workforce demand (e.g. high budget scripted TV). p.6.

<sup>56</sup> See Ofcom, 2024. [Public Service Broadcasting Annual Compliance Report](#).

# 4. Funding and production of PSM content

## In this section we:

- Explore the options for ensuring that sufficient long term funding is in place, so that everyone can continue to access PSM content in the future.
- Consider options to support the sustainable production of PSM content over the longer term.

## Introduction

The financial sustainability of the PSBs remains under significant pressure. They have seen declining revenues from linear TV advertising and from the TV Licence fee. They also bear the costs of reaching audiences across multiple platforms and have been adapting to reach audiences on third-party platforms.

Left unchecked, the worsening financial situation of the PSBs makes it increasingly difficult for them to meet their obligations in terms of the range, volume and quality of the TV programmes commissioned. It is likely that the largest impact will be felt amongst less commercial genres such as children's television, news and local news.

Here, we consider options to improve support for PSM in the UK generally, for example by increasing revenues or reducing the costs of providing PSM. Given the pressures on the provision of less-commercial content, we also consider how support could be targeted at areas where it is most needed. We look at ways to maintain and improve support for the PSBs and strengthen PSM through a wider set of contributors.

PSB commissioning is the cornerstone of the UK's successful production sector and has driven skills and business development across the whole of the UK, enabling producers to attract significant international investment. As the PSB budgets decline, we consider ways to support the sector to continue to adapt to changes in commissioning and audience demand.

Many of the options we outline would need action from the Government or another regulator and where this is the case, we set out our understanding and the key policy considerations.

## Options to put PSM on a secure footing

### The future of the TV Licence fee will have a significant impact on PSM

Revenues from TV Licences are one of the largest sources of funding for PSM and are the main revenue source for the BBC and S4C, providing just under £3.8bn of revenue in 2024/5.<sup>57</sup>

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<sup>57</sup> [BBC Group, Annual Report and Accounts 2024/25](#), July 2025, p.58.

In November 2024, the Secretary of State said the government was committed to ensuring the BBC is on a “*stable financial footing*” and that the cost of a TV Licence would increase in line with inflation each year until 2027.<sup>58</sup>

The government will consider the future of the BBC funding model as part of the next Charter review process which is due to begin in 2025, delivering a renewed Charter by the end of 2027.<sup>59</sup> It has said the review “*will ensure the BBC is empowered to continue to deliver a vital public service funded in a sustainable way, delivering a BBC that can maintain the trust and support of the public in difficult times, support the wider ecosystem, and that is set up to drive growth in every part of the United Kingdom*”.<sup>60</sup>

Given the importance of the BBC and S4C as public institutions, and the importance of TV Licence revenues for the overall funding of PSM, the outcome will be a critical factor determining the future of PSM in the UK.

## Investment obligations, levies and contestable funds could be used to support PSM in the future

A range of financial incentives are used in some countries to support the delivery and production of PSM. While the Government has dismissed introducing a levy, several stakeholders have asked for these tools to support PSM, so we have included them as options to consider for the longer term.

There are many ways to set up investment obligations, levies and contestable funds with different ways to generate investment, administer schemes and distribute funds. In practice any policy intervention can also combine several elements:

**Investment obligations** require selected media providers to invest a percentage of their revenue into areas specified in the regulation. These often come with detailed requirements on where the investment should be targeted, such as programming relating to a specific country or region, supporting indigenous languages, developing talent or training and access services for disabled audiences.

**Levies** require selected media providers to pay a proportion of their revenue into a central fund. This is typically administered by an independent body which distributes funds to meet specified objectives. For example, grants may be allocated to support the production of a particular type of content.

**Contestable funds** are a way to distribute funding. This could come from media providers through a levy, or it could come from government (e.g. as a grant or through an allocation of TV Licence fee revenue). They are typically administered by an independent body with clearly defined objectives, through a competitive bidding process.

## Stakeholders have mixed views on investment obligations, levies and contestable funds

We have talked to many stakeholders that have suggested investment obligations, levies and/or contestable funds as a way to support PSM in the future.

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<sup>58</sup> House of Commons Debate, 29 November 2024, [BBC Funding Model: Licence Fee and Simple Payment Plan](#), vol 757, col61WS.

<sup>59</sup> House of Commons Debate, 17 December 2024, [BBC Charter Review](#), vol 759, col290.

<sup>60</sup> Department for Business and Trade (DBT) and DCMS, June 2025. [Creative Industries Sector Plan](#), p. 46.

A recent House of Commons inquiry into ‘[British Film and High-End Television](#)’ (HETV) considered that streamers should provide greater support for the production of culturally British content and that they should pay 5% of their UK subscriber revenue into a cultural fund.<sup>61</sup> The Government [responded](#) saying it has “*no plans to introduce a levy on SVoD services*,” as enabling strong inward investment will provide benefits to the domestic production industry and wider economy. It is however committed to removing barriers to growth including increasing support from public finance and the pool of debt and equity available to the creative industries.

Channel 5 has suggested that contestable funding should be directed towards content that would not otherwise be commercially viable. Sky noted there were multiple potential options, including contestable funds for at-risk content. The [Children’s Media Foundation](#) said there was not sufficient investment to ensure high-quality, socially and culturally relevant, age-appropriate content is made for young people. However, COBA and Creative UK argued that a levy would potentially disincentivise UK investment.<sup>62</sup> Creative UK said that it “*would place an undue burden on streamers and make the UK less competitive to inward investors*”.<sup>63</sup>

## A range of financial incentives have been used to support PSM in the UK and other countries

DCMS set up the [Young Audiences Content Fund](#) that was run by the BFI between 2019 and 2022. It was a contestable fund aimed at supporting the production and development of children’s content. The scheme provided production grants (totalling £44m) to 160 development projects and 61 actual productions. An evaluation concluded that the fund delivered on its aim to address key deficiencies in children’s programming, and that it was efficient, economic and fair.<sup>64</sup>

French domestic broadcasters have been subject to investment obligations and levies since the 1980s<sup>65</sup> and similar rules were introduced in 2021 for SVoD services (see Annex 2). A review found that the investment obligations accounted for €866m (around £745m) in investment from Netflix, Amazon and Disney+ between 2021 and 2023, and the levy raised €178.3M (around £155m) in 2023,<sup>66</sup> which was mainly invested in original French language programmes.<sup>67</sup> Canada has also required VoD services to provide an estimated CA\$200 million (around £100m) per year in new funding for Canadian and Indigenous content. This is being [challenged](#) by the Motion Picture Association of Canada, which represents companies including Netflix and Disney.<sup>68</sup>

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<sup>61</sup> House of Commons, Culture, Media and Sport Committee, April 2025, [British film and high-end television](#), First Report of Session 2024–25, p. 26-27.

<sup>62</sup> House of Commons, Culture, Media and Sport Committee, April 2025, [British film and high-end television](#), First Report of Session 2024–25, p. 25

<sup>63</sup> [Written evidence from Creative UK](#) to House of Commons, DCMS Select Committee on British Film and High-End TV (HETV), para. 95.

<sup>64</sup> Bigger Picture research, December 2022. [Young Audiences Content Fund Pilot: End of term evaluation](#).

<sup>65</sup> CNC, December 2010. [Regulation of film-television relations](#).

<sup>66</sup> CNC, 2023. [Bilan](#).

<sup>67</sup> CNC, November 2024. [Implementation of the decree applicable to SVOD services](#), p. 2.

<sup>68</sup> Motion Picture Association – Canada, 2024. [Canada Files for Review of CRTC Decision to Force Global Entertainment Streaming Services to Pay for Local News](#).



## These interventions could have some advantages but there would be policy challenges

Investment obligations, levies and contestable funds can provide a new source of funding from a wide variety of media providers and can be targeted at PSM content that is underfunded or most at risk.

Investment obligations and levies would need to be designed in a way that minimises distortion of the market and competition. For example, by spreading the burden of supporting PSM as widely as possible, ensuring competing firms face an equivalent burden and that any fund is open to all media providers. Any new system would also need to fit with existing forms of support for PSM to form a coherent package (including tax credits discussed below).

The Government would need to determine what content should be supported by any fund and what criteria it would be subject to. Government would also need to consider the possible implications for the UK production sector, including implications for skills and business development, and the future resilience of the sector.

Some stakeholders have raised concerns that any such obligations could deter investment in the production sector and would need to be designed to maintain and grow investment in the UK. International VoD services have invested considerable sums in UK production in recent years, representing around 24% of total UK independent primary commissioning revenue in 2023.<sup>69</sup> As an example of this, [Netflix's average annual spend](#) on UK productions in 2023 was nearly two thirds of its total UK revenue.<sup>70</sup>

Other countries, such as France, have been successful in designing obligations that boost the amount of investment or ensure a minimum level from eligible media providers. However, if a system led to decreased investment, it could impact significantly on the UK production sector and audiences.

Additionally, any audiovisual policy measures such as levies and tax credits might be caught up in wider international discussions around trade policy.

## Tax credits could be used to incentivise investment in less commercial PSM content

The UK has a longstanding system of tax credits that are designed to incentivise the production of content that reflects UK culture and support the growth of the audiovisual sectors. The PSBs can benefit from tax credits when they make or commission eligible content.

Companies are eligible for the tax credit if they are involved in the production or development of film, high-end television (if the programme is a drama, comedy or documentary), children's television or animation that has been certified as British.<sup>71</sup> The current scheme gives eligible producers extra deductions to lower their tax bill or a payable credit in the event of a loss.

An [evaluation](#) of the creative industries tax relief commissioned by His Majesty's Revenue and Customs (HMRC) in 2022 concluded there was strong evidence tax reliefs have led to more productions taking place in the UK. Its analysis estimated HETV tax relief added £0.7bn to £1.0 bn to the economy in 2019/20. The breakdown of tax relief paid between 2021 and 2023 is shown in

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<sup>69</sup> Pact UK Television Production Census 2024, Oliver & Ohlbaum analysis.

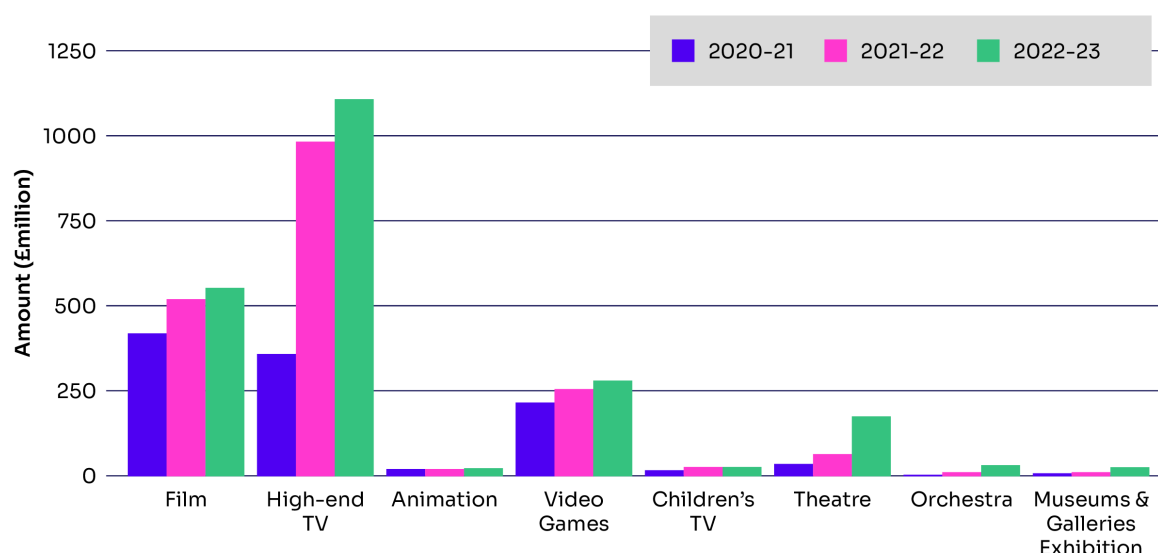
<sup>70</sup> Netflix [reported UK revenues of nearly £1.7bn in 2023](#), and it claims that it [invests nearly \\$1.5bn \(~£1.1bn\) every year in UK made shows](#).

<sup>71</sup> There are also tax reliefs available for companies involved in the production or development of video games, theatrical productions, orchestral concerts, museum or gallery exhibitions.



Figure 8 below. In 2024, the system of tax reliefs for creative industries was reformed to expenditure credits and the value was raised for children’s television, animation, independent films, and visual effects.<sup>72</sup>

**Figure 8: Creative industries tax reliefs (£ million, accruals basis) paid in relation to financial years ending 2021, 2022 and 2023**



Source: [HMRC Creative industries statistics commentary: August 2024](#)

## There is widespread support for an expansion of the tax credit system

We heard several proposals for how an expanded scheme might target PSM in different ways.

The PSBs called for the tax credit system to be reformed and extended to further support PSM. They suggested tax credits could support key and at-risk genres such as “*children’s, regional news, minority language, comedy, continuing drama or UK-focussed HETV drama and scripted comedy.*” The PSBs also suggested tax credits be used to further public service objectives like out of London production, preserving IP within the UK, and co-production with themselves. They considered “*a well-designed system, with enhanced cultural tests, [...] and support for PSB windows, could ensure a future for PSB objectives.*”

Sky called for an expansion to the existing tax system – for example to cover creative research and development (‘R&D’) undertaken as part of Film and TV development. While the Government said it is not planning to change the existing R&D rules, HMRC will publish revised guidance to clarify the arts activities that are within the definition of existing R&D tax relief.<sup>73</sup>

Some stakeholders also called for more flexibility in the tax relief system – for example by reducing the proportion of qualifying spend that must be made in the UK, which could make it easier to co-produce with international partners.

<sup>72</sup> See House of Commons Library, 2024. [The creative industries tax reliefs: Policy and development](#); HM Revenue & Customs, 2024. Policy paper: [Additional tax relief for visual effects \(VFX\)](#); and, DCMS, 2024. Press release: [UK’s world-class film sector handed major jobs and growth boost by tax reliefs](#).

<sup>73</sup> House of Commons, Culture, Media and Sport Committee, July 2025, [British film and high-end television: Government response](#), Fourth Special Report of Session 2024–25.

The Citizens' PSM forum advocated for the eligibility of future tax credits to fund content that is available universally to British citizens and not behind a paywall.

Channel 4 said that tax credits for high-end television have assisted in attracting international investment but that it had contributed to significant cost inflation which risks PSBs being priced out of certain content genres.

The Government recognised the importance of “*maintaining our position of strength*” as a destination for inward investment. It highlighted initiatives already in place to support growth in the sector including additional tax support for independent film and an uplift for visual effects. However, it said there “*are multitude of factors to consider when deciding on new tax reliefs beyond return on investment and sector impact*” and it was committed to ensuring that all public money is spent and targeted effectively across the full breadth of the creative industries and the economy.<sup>74</sup>

## The Government could consider tax credits to support PSM in the future

The creative industry tax credit system has widespread support for attracting international investment into the UK production sector and has helped fund a wide variety of film and TV projects within the UK, particularly high-end TV and film productions. It may also have helped the PSBs commission a wide variety of programmes. As discussed in [Annex 2](#), tax credits are used to promote TV and film production in many countries around the world.

Any expansion or reform of tax incentives would need to be carefully considered in terms of its effectiveness alongside, or in place of, other forms of support for PSM. There are already tax credits in the UK for children's TV. In 2024 they were increased from 34% to 39%; the highest level of tax credit available across all genres.<sup>75</sup>

News and regional news are not currently eligible for any creative industry tax credit.<sup>76</sup> Tax credits could be used to help improve financial incentives to produce news. The practicality of tax credits to incentivise regional production would need to be carefully considered, given the complex nature of productions which are often made across different locations.

The government would also need to consider other impacts of any expansion. For example, expanding tax credits to target less commercial content may result in lower tax revenues or expanding them in areas where production resources are already in high demand may risk further cost inflation.

## Securing a fair return for content creators and commissioners online

It is important that PSBs and other content commissioners and creators see a fair return when their content is watched on third-party platforms such as Google, YouTube, TikTok, Facebook or Instagram, or where it is used to provide another service such as a GenAI summary. Content creators have longstanding concerns about the terms that they receive from some third-party platforms. This includes claims that there is an imbalance of bargaining power between platforms and content

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<sup>74</sup> House of Commons, Culture, Media and Sport Committee, July 2025, [British film and high-end television: Government response](#), Fourth Special Report of Session 2024–25, p6.

<sup>75</sup> There were also new tax credits introduced for Visual Effects and independent film. [New tax credits for British film, TV and video game makers start from today - GOV.UK](#).

<sup>76</sup> News specifically excluded from the HETV tax credit. See HMRC guidance, [Claiming High-end Television Tax Relief for Corporation Tax](#).

creators<sup>77</sup> and concerns about the competitiveness of digital advertising markets.<sup>78</sup> They have also raised concerns about copyright and their ability to control and be remunerated for the use of their content in AI services.

## Competition law can help ensure a fair return on third-party platforms

The Digital Markets, Competition and Consumers Act 2024 (“DMCC Act”) introduced new powers for the Competition and Markets Authority (CMA) to investigate and, if necessary, address competition problems in digital markets. The CMA recently published a consultation on its proposal to [designate Google as having ‘strategic market status’ \(SMS\)](#) in general search and search advertising. The CMA’s deadline to issue any SMS Decision Notice is October 2025 and it expects to issue a consultation on initial conduct requirements shortly after any final SMS decision.<sup>79</sup> The CMA has provisionally found that Google has substantial and entrenched market power in general search and search advertising. If this is confirmed, the CMA will be able to introduce, subject to further legal process, interventions affecting how Google interacts with its customers and suppliers to mitigate any potentially harmful outcomes in that market. As part of this they are considering concerns related to fair and reasonable terms for publishers, including payment terms and insufficient controls over how their content is used in AI Overviews, Google’s GenAI search summary.

This investigation will not look at other platforms such as YouTube, Facebook or Instagram or digital advertising markets beyond search advertising.<sup>80</sup> Nonetheless, it represents an important first step in exploring the competition concerns that content creators have and the DMCC Act provides a powerful new tool to investigate and, if necessary, resolve competition problems in digital markets. We are working closely with the CMA on this investigation to ensure that the interests of audiences and content creators in the markets we regulate are represented, building on the work we have previously done with the CMA on platforms and publishers.

## The Government is considering reforms to copyright

Strong copyright protection enables creators of all types to earn a return on their investment in content. Rights holders have said that they are finding it difficult to control, and be remunerated for the use of their work in training AI models. For example, some news providers have said that their content can be scraped and ingested by large language models (“LLMs”) to create GenAI content without consent or fair remuneration. It is also possible that news readers could start to rely on these summaries rather than accessing full pieces of content from news providers, which could reduce traffic to publishers’ websites.

Some news providers have licensed their content for use in GenAI models to generate revenue, including Sky, [DMGT](#), [The Guardian](#) and [The Financial Times](#), but there may be a risk that as the largest news providers make deals with AI companies, smaller providers, including some local providers, could be left behind. Elsewhere other providers, including [the BBC](#), CBC Radio Canada (the

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<sup>77</sup> See [Ofcom and CMA joint advice to the Secretary of State](#) for a summary of these concerns.

<sup>78</sup> These concerns were investigated by the CMA in 2020 in its [Online platforms and digital advertising market study](#).

<sup>79</sup> In a parallel process, the CMA is also investigating whether Google and Apple should be considered to have Strategic Market Status in relation to their [mobile ecosystems](#).

<sup>80</sup> In the US, Google has been the subject of two separate federal cases brought by the US Department of Justice and several states in (i) the District Court for the District of Columbia in relation search engines and search advertising and (ii) the District Court for the Eastern District of Virginia in relation to advertising technology. The company is also challenging an [antitrust fine imposed by the European Commission](#) in 2018 regarding its Android mobile operating system.

Canadian PSB), The [New York Times](#) and NDTV in India have [launched or threatened court action against some of the biggest global GenAI companies](#) for using their material without permission or remuneration. The Department for Science, Innovation and Technology (DSIT) issued a [consultation](#) in December 2024 with proposals for copyright reform that aims to support right holders' control of their content and ability to be remunerated for its use. It also aims to aid the development of world-leading AI models in the UK by ensuring wide and lawful access to high-quality data and promoting greater trust and transparency between the creative and AI sectors. The government has also set out its intention to establish a Creative Content Exchange to facilitate a marketplace for this content.<sup>81</sup>

There has been much public debate on these issues and the outcome of this debate could have important implications for the financial sustainability of the PSBs and other content creators.

## **Ambitious partnerships could help sustain the future provision of PSM**

Cooperation and consolidation can provide a way for the PSBs and other operators to achieve scale and provide services more efficiently. This could help the PSBs adapt to the financial challenges they face and will benefit UK audiences if they result in better availability of PSM content.

The PSBs said that some or all UK players will need to increase their scale to have a broader chance of future success. They asked regulators and Government to take a “*pro-UK approach to the application of competition law*”. They considered this should be based on a forward-looking and dynamic approach to market analysis which recognises both the global nature of the markets in which the PSBs now operate and the public policy objectives that are entrusted to them.

The Government's [Creative Industries Sector Plan](#), said that it will support the PSBs to provide public service content to all audiences including through co-productions, encourage the PSBs to create deep strategic partnerships and ensure they remain at the centre of a strong and resilient domestic TV sector. It asked the CMA and Ofcom to set out how changes in the sector – such as the convergence of broadcast, on-demand and video sharing – could be taken into account as part of any future assessment of TV and advertising markets.<sup>82</sup> We will work with the CMA to do this.

It is for the PSBs and the wider industry to develop specific proposals for partnerships to achieve scale and we understand that they are considering a wide range of opportunities. We think it would be worth the PSBs exploring collaboration around technology and AI. They have announced the [joint development of an advertising platform](#) by Sky, ITV and Channel 4 and that [ITV and Disney will carry each other's streaming services](#). In May outgoing Channel 4 chief executive [Alex Mahon](#) suggested that PSBs might use partnerships to reduce technology costs and the BBC's Director General, [Tim Davie](#), has talked about the scope for partnerships with local media and with cultural institutions.

In Germany, the PSBs [ZDF and ARD are collaborating](#) to develop a joint operating system to manage core parts of their streaming services. Their technology is also open source, allowing other providers of public interest content, such as cultural institutions, to benefit. In France, [proposals are being considered to merge the PSBs](#) France Télévisions, Radio France, France Médias Monde and the Institut national de l'audiovisuel, into a single holding, with the aim of supporting innovation and sustainability in the public interest. In addition, [Amazon Prime Video recently made a deal with French PSB, France Télévisions](#), which will give the streamer access to its live and on-demand

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<sup>81</sup> DCMS, 2025. [Creative Industries Sector Plan](#), p.17.

<sup>82</sup> DBT and DCMS, June 2025. [Creative Industries Sector Plan](#), p. 46.

content and [Netflix has a deal with French commercial broadcaster TF1](#) to carry linear and on-demand content (including live sports).

While partnerships can deliver benefits, they can also pose risks to competition and plurality. Competition between video services for audience attention provides a powerful incentive for providers to invest in their individual services, to provide their viewers with attractive content and a good user experience. Audiences also benefit from a plurality of providers which has allowed each PSB to develop a strong brand that people trust, develop a distinctive voice and innovate to find new ways to reach audiences. Competition law and media plurality rules are in place to preserve these benefits.

Fighting for the attention of UK audiences has increased significantly in the last 20 years. Media providers no longer need access to radio spectrum or a satellite network and Netflix, Amazon, Disney+ and Apple TV+ now have a substantial share of UK viewing. Their global reach allows them to invest in compelling content and extensive technological development and to recover the costs of those investments in markets around the world. They have shown that they can deliver content from a variety of genres including UK-focused content. VSPs like YouTube have also won a significant share of TV viewing with an ecosystem that produces a vast choice of innovative new content.

To ensure that their BVoD services can compete with these platforms, PSBs need to invest in technology as well as content to attract the attention of UK audiences. They are at a disadvantage when making investments of this type because they lack the global scale of leading streamers and VSPs. This increases the importance of finding effective partnerships that can help them make and recover these necessary investments.

The UK ad market has also been [transformed](#) in the last two decades. The rise of online platforms has profoundly impacted TV advertising, leading to shifts in advertising models. These changes are reshaping the industry, making audio-visual advertising more accessible to a broader range of businesses, including small and medium enterprises, and shifting the focus of advertising from outputs (e.g. audience size) to outcomes (e.g. consumer action in response to an advertisement).

If the PSBs can find ways to collaborate that capture the benefits of competition and plurality then this will help sustain the provision of PSM in the future. Ultimately competition law is an evidence-based process and we would expect that any competition assessment will take account of the benefits that the partnership will bring and of these new realities of competition.

## **Urgent clarity needed on how TV will be distributed in the future**

In December, we said distribution costs were a substantial portion of broadcasters' non-content costs. In 2023, commercial broadcasters (PSBs excluding BBC) paid a total of £218m in transmission costs which include DTT, satellite and cable. On top of this there are substantial costs associated with maintaining a service of linear channels. Viewers are spending less time watching TV over DTT, making it less cost effective per viewer. This is projected to continue and broadcasters told us there will be a tipping point at which supporting DTT in its current form is no longer commercially viable.

In our [Future of TV Distribution report](#), we set out different ways to secure universal broadcast TV for audiences who rely on it. These involved strengthening the DTT network by reducing its cost or supporting audiences to migrate to IPTV. The latter option could potentially be complemented with a fallback 'nightlight' service delivered by DTT or satellite for those who cannot be supported onto online delivery. We also highlighted considerations that go beyond the TV industry. To ensure continued universality, consumers may need to be supported to take-up internet access, which

would have ancillary benefits for digital inclusion. Were DTT not to be deployed on some or all of the network in future, it could create costs for other critical services on the network such as radio.

Following submission of our report last year, the Government has launched a range of work including extensive stakeholder engagement and research to develop its response to the challenge of securing the future of TV distribution for everyone.

### Support for DTT to IPTV transition, but financial concerns remain

The PSBs support a transition to IPTV in the 2030s as it is becoming increasingly challenging “*to bear double costs from running multiple distribution platforms*”. They said the changeover (necessarily involving a broader adoption of internet connectivity across all households) would bring economic and societal benefits.

They argued that provisions should be put in place to support universal access to IPTV and, if needed, a temporary service to smooth the transition for audiences. They also said PSBs should not pay the transitional costs given the scale of the costs and the much broader public interest involved. The PSBs also thought that if Government continues to require DTT to deliver universality the cost of DTT upgrades, maintenance and running costs should be borne by the Government as a cost of universality to avoid duplicative and unsustainable expenditure for PSBs. In addition, the BBC was considering offering a streaming media device designed specifically to help those yet to benefit from IPTV services.<sup>83</sup>

The Citizens’ PSM Forum pointed at research which highlighted the critical importance of DTT in helping audiences access high-quality news, particularly for people that cannot afford broadband or more expensive TV subscriptions.

### A plan for the future of DTT is more urgent than ever

Within the next few years delivering TV universally on DTT will go from being a significant benefit to the PSBs, to a substantial obligation they will need to finance. This would mean more investment being diverted into distribution, rather than commissioning content that benefits all audiences and the creative industries.

As the PSBs focus on serving audiences online and invest in those services, households with IPTV will benefit. But, if the migration of audiences continues unmanaged, those who rely on DTT risk losing out on the best content or functionality. This fragmentation of audiences means the principle of universality is already fraying.

The findings in this PSM review show that the need for a vision and plan for how universal PSM will be delivered is now more urgent. The timeliness of the Government’s decision remains a critical factor. We said in May 2024 that a decision within two years would be needed. We continue to believe that a decision in early 2026 would allow sufficient time for all options to be considered. A later decision risks undermining the investment and innovation needed to manage an inclusive transition.

### Ensuring IPTV costs remain competitive

The costs of IPTV delivery are currently relatively low compared to the cost of DTT and satellite distribution, but several stakeholders have expressed concern that costs may rise significantly in the future as volume shifts from DTT to IPTV. In addition to increasing costs driven by the need for extra

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<sup>83</sup> BBC News, 2025. [BBC director general Tim Davie vows to tackle Britain's 'crisis of trust'](#).



capacity, PSBs said that ISPs may additionally increase costs for preferential traffic delivery terms which may be needed to maintain a high-quality and reliable service. For example, they pointed to ISPs taking steps to charge for interconnection. PSBs said there should be regulatory support for IPTV distribution to replace the benefits of spectrum access. They suggested this could include *“regulated terms of interconnection and carriage between designated content providers and appropriate network providers.”*

As dependence on IPTV delivery grows, it is increasingly important that ISPs and PSBs reach efficient, sustainable solutions for distributing high-quality content in a fair and competitive market. This will help drive innovation, lower costs and improve services for consumers. Ofcom has a role in ensuring that telecoms networks remain efficient and markets remain competitive, including interconnection and CDN services. We also oversee net neutrality rules that provide for the non-discriminatory delivery of traffic by fixed and mobile broadband service providers.

## **Additional support for Listed Events**

High-profile sporting events have long been successful in bringing the country together and connecting audiences with the PSBs – they are one of the few television events that remain successful in drawing large audiences.

The listed events regime aims to ensure that coverage of certain major sporting events of national interest, such as the Olympic Games and the men’s and women’s football World Cups and European Championships Finals tournaments, are widely available to audiences across the UK for free. The Media Act modernised the regime in a number of ways including bringing streaming services into scope alongside broadcast services. However, in the context of our [implementation of the Media Act for listed events](#), stakeholders have said that a lack of protection for on-demand digital content rights may limit the effectiveness of the regime.

Many providers argued that digital and on-demand content is now an essential part of a sports rights package, alongside live coverage and traditional long-form highlights packages. The BBC said that audiences would likely consider two live streams of the Olympics inadequate if it had no or very limited digital rights. Channel 4 believed a lack of digital rights could lead to fewer opportunities for online audiences to view coverage of nationally important events.<sup>84</sup> Many service providers say that digital and on-demand content is now an essential part of a sports rights package, alongside live coverage and traditional long-form highlights packages. As part of [research commissioned for our listed events consultation](#), one broadcaster said that *“the restriction of only having the live output and no catch up in any form whatsoever, be that highlights or clips [would] quite possibly be enough to walk away [from a contract negotiation]”*.<sup>85</sup>

We have also found that VoD represents an increasing proportion of sports viewing. In 2022 6% of sports viewing on the PSBs occurred on BVoD services, with the rest occurring through their linear channels. By 2024, this had risen to 10%.<sup>86</sup>

To ensure the listed events regime remains effective as viewing habits change, the Government may want to consider whether on-demand digital rights to listed events should be protected (and if so, how) as part of a wider package to support PSM. We note that expanding the listed events regime

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<sup>84</sup> Ofcom, 2025. [Listed events: Implementing the Media Act](#). Paragraph 7.6.

<sup>85</sup> Ampere Analysis, 2025. [Trends and Dynamics in the Sports Broadcasting Sector](#) – 2025 Edition, p.99.

<sup>86</sup> Barb as-viewed on TV sets and other devices using the home’s WiFi network, individuals 4+.

would also impact sports bodies and other media providers, which the Government would need to take into account to ensure any changes are proportionate.

## **Additional support for news**

In December, we set out the challenges relating to the financial sustainability of news including the dependency that news organisations have on big tech companies, the imbalance in their relative bargaining positions, and the increasing costs of providing content across multiple platforms.

There are also some specific areas which could benefit from additional support. In our [Local Media Review](#) we highlighted that the local news sector could benefit from innovation funding, which the [Government has said it is considering](#). We also noted the potential benefits of local government working with local journalism, for example to give greater access to public bodies. Stakeholders raised concerns that finding and retaining skilled journalists was difficult. Local media providers can train and act as a talent pipeline for the wider sector, and so finding ways to support this training is likely to be beneficial. [Stakeholders](#) have also called for additional funding for media literacy initiatives.

In our Local Media Review, we flagged that many stakeholders supported the expansion of the BBC funded Local Democracy Reporting Scheme (LDRS), possibly as part of Charter negotiations. Earlier this year, Tim Davie [noted](#) the possibility of expanding the LDRS to include health authorities, police and crime commissioners, and deeper analysis of the regional mayoralities.

We also suggested there should be greater collaboration between PSBs and the local media sector such as collectively promoting awareness of the role and value of local media to local communities; providers in a local area pooling resources to cover stories and develop talent; and creating long term partnerships with local universities or community radio providers. The BBC, given its role in the Local News Partnership, has an important role here.

We anticipate that the Government will publish details of its previously announced Local Media Strategy in the coming months. We will consider what further work we may need to undertake to support the sector once the Government's strategy has been published.

## **Supporting the UK production sector to make PSM content for UK audiences**

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The financial challenges facing the PSBs and changing demand from audiences have led to a slow-down in their commissioning, with a focus on fewer 'high-impact' productions. The UK production sector is experiencing a turbulent period of transition as it adapts to these changes, along with growing reliance on increased but unpredictable international investment and inflation in content production costs. The sector needs to adapt to these changes and its size and make-up may continue to evolve. It is important that the sector retains sufficient capacity and dynamism to provide high-quality PSM content, and that there are pathways for UK talent and businesses to progress.

### **There are opportunities as commissioning continues to change**

There needs to be stable and adequate funding for the PSBs and provision of PSM content. This could increase demand for UK-made productions, improve the resilience of the production sector, and support skills and business development across the UK. In addition, the government's [Creative Industries Sector Plan](#) sets out a range of measures to support the creative industries, including the film and TV industry. These include a new £75 million Screen Growth Package, which includes



increased funding for the UK Global Screen Fund,<sup>87</sup> support for businesses to access growth finance, measures to address skills gaps and support freelancers, and a new £150 million Creative Places growth fund for six regions outside London.<sup>88</sup>

## The PSBs should continue to find creative ways to fund content

We welcome examples of the PSBs working collaboratively to maximise the impact of content budgets. For example, [the BBC's partnership with the German broadcaster ZDF](#) aims to support producers to create high-end drama for the two broadcasters, sharing opportunities earlier to help producers finance their programmes more quickly, and in turn helping the BBC and ZDF access titles which may otherwise go to global buyers. The [BBC is also one of 11 European PSBs](#) that will collaborate to produce a new animation series for young viewers across Europe. We encourage the PSBs to continue to find creative ways to address budgetary challenges.

## Industry should continue supporting the growth of skills and businesses

As mid-value commissions decline, there is an opportunity for the PSBs and wider industry to think innovatively about alternative routes to support producers and people working in production to build capability for increasingly higher-end commissions. For example, we understand that some PSB shows are co-produced by smaller and larger producers, whereby smaller producers offer creative ideas for commissions and benefit from the resources and experience of larger producers. We encourage larger producers to find additional creative ways to support the development of smaller producers, and the PSBs to facilitate different types of partnerships. We have also heard suggestions of alternative ways to up-skill talent for higher-budget PSB productions. Directors UK recommended more paid skills development opportunities on high-budget productions<sup>89</sup> and collaboration between PSBs to map career paths. The BBC suggested greater collaboration between the BBC and other PSBs – as major investors in UK programming – on supply strategy and provision of training resources. We support these suggestions to help ensure the future sustainability of UK skills.

The PSBs have a range of initiatives that support different levels of the production ecosystem, including funds and schemes to support the growth of smaller to mid-sized producers across the UK and the development of skills and workers from underrepresented backgrounds. We welcome efforts to develop the mid-layer of production companies; for example, Channel 4's [Business Boost](#) includes targeted support for medium-sized or fast-growing independent production companies based in the nations and regions to help them reach the next stage of growth. We welcome innovative initiatives to expand the talent pipeline, including the PSBs and other providers collaborating with content creators (e.g. YouTube and TikTok digital natives) to connect with younger audiences.

We support the ScreenSkills and 4Skills report recommendations on targeting initiatives at role-specific technical skills gaps and at transferable skills development in areas of declining demand (e.g. unscripted content production), while tailoring initiatives to different UK nations and regions. This can support greater workforce mobility and ease pressures in high demand areas.

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<sup>87</sup> Funding will be increased to £18 million annually (2026-2029) to develop international business capabilities, enable co-productions and showcase independent UK screen content worldwide.

<sup>88</sup> This will be devolved to six Mayoral Strategic Authorities who will be able to spend the fund to develop regional film and tv hubs across England.

<sup>89</sup> For example, Directors UK partners with production companies to deliver paid skills development placements. See case study examples from the placements, including [here](#) and [here](#).

As PSB budgets decline, we also consider there is room for greater collaboration between different screen agencies to maximise the impact of funding and support a suitable range of resilient production centres across the UK.

## Focusing support for certain production companies

The UK production sector has adapted to, and benefitted from, the increased presence of global commissioners and larger/non-UK owned producers. However, while some larger producers have more commissioning options than before, smaller and more specialised producers may be more likely to rely on PSBs for commissions. The PSBs have quota obligations to commission content from qualifying<sup>90</sup> independent producers and Ofcom issues guidance<sup>91</sup> for them in relation to commissioning from these producers. These regulations do not distinguish between different types and sizes of independent producers.

Some stakeholders have suggested targeted support for smaller and/or UK-owned production companies by narrowing the criteria to qualify as an independent producer for both the PSBs' independent production quota obligations and for the commissioning guidance. The BBC has said that tightening the qualification criteria for independent production could lead to a number of different outcomes, including potentially enabling a greater diversity of producers, which could support UK output, genre specialisms and out of London production. The BBC also said that different commercial deals with producers outside the scope of the criteria can support greater value for licence-fee payers and reinvestment in the wider sector. We have also spoken to academics who have raised concerns about production companies owned by foreign companies qualifying for the independent production quota.

Although smaller independent producers often bring valuable new and diverse ideas to UK audiences, there may be potential trade-offs in narrowing the qualifying criteria. For example, if the independent production quota were to require PSBs to increase levels of commissioning from smaller companies, this could restrict the flexibility of the PSBs, through mandating reliance on companies which may not have the required experience or capabilities to meet their commissioning needs. It could also potentially disincentivise acquisitions of smaller producers by larger companies which can provide greater financial support for fresh ideas and talent and ultimately bring diverse stories to audiences. In addition, companies owned by foreign broadcasters or with other non-UK-based ownership contribute to the national (and relevant local) economy by investing in UK-based productions.

The DCMS Committee's British film and high-end TV report recommended that new regulation be applied to SVODs to ensure production companies retain a minimum level of ownership of their IP (using similar mechanisms to the PSB commissioning guidance)<sup>92</sup> which it argues would help them to build sustainable businesses.<sup>93</sup> However, there are relevant questions around proportionality given

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<sup>90</sup> The definition of an 'independent producer' is one who is not an employee of a broadcaster; does not have a shareholding greater than 25% in a broadcaster; and is not a body corporate in which a broadcaster has a shareholding greater than 25% (or in which two or more broadcasters have aggregate shareholdings greater than 50%). See the Broadcasting (Independent Productions) Order 1991.

<sup>91</sup> Ofcom issues [guidance](#) for PSBs in drawing up Codes of Practice for commissioning from independent producers.

<sup>92</sup> The Communications Act 2003 includes a set of requirements about programme commissioning by PSBs from independent producers. Broadly, the effect of this regulation is that independent producers, by default, retain the secondary rights for their content.

<sup>93</sup> See House of Commons, Culture, Media and Sport Committee, April 2025. [British film and high-end television](#), First Report of Session 2024-25, p.24.

SVoDs have invested significantly in the UK, are not subject to the benefits or obligations of the ‘PSB compact’, and other UK non-PSB broadcasters are not subject to such obligations either. The Government’s response to the report also highlights the benefits of a mixed ecology where producers can strike deals both with streamers, which typically involve higher upfront fees, and with PSBs, where secondary rights normally remain with the producer.

## **We will continue to assess developments and intend to carry out further related work**

It is clear that the sector is in a period of flux and transition which will likely continue over the coming years. Changes are also underway in terms of updating the PSB production obligations under the Media Act and Channel 4 beginning a [phased move into in-house production](#).

As the sector reshapes, we will continue to closely assess developments in the production of PSM content for UK audiences. Our review of our regulation of broadcast TV and radio (discussed in Section 7) will take account of the interdependent relationship between PSBs and the UK production sector in making PSM content that reflects the diversity of the whole of the UK.

## **Conclusions on funding and production of PSM content**

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PSM will need stable and adequate funding in order to maintain a wide range of PSM content for UK audiences. This includes trusted and accurate news and programmes that tell UK stories, showcase the diversity of the whole of the UK and bring the country together. The PSBs and other providers need the flexibility to adapt to rapidly changing viewing habits. Commissioning by the PSBs is also key to maintaining a vibrant and sustainable UK production sector.

It is for Government to make decisions on the overall funding level and how this should be delivered. There are a wide range of options and, given the scale of the challenge, it is likely that a package of several measures will be needed to ensure that PSM will deliver for audiences into the future.

### Recommendations:

- Stakeholders have called for a range of measures to support funding for PSM content including levies and changes to tax credits to fund specific PSM genres. It is for the Government to consider these, and to lead work on the future funding of the BBC through its Charter Review.
- If there is to be new funding, we recommend that it should prioritise genres that are socially valuable but commercially less viable and attract lower advertising revenues, such as news, local news and children's programming.
- Content creators need to earn a fair return for their work on third-party platforms, including when used to train GenAI services. The Government is considering responses to its consultation on AI and copyright. The CMA has also recently opened a consultation on Google Search, which includes a number of potential interventions that should help improve commercial terms for content creators who rely on search.
- The PSBs (and other UK providers) should pursue new strategic partnerships (e.g. in technology and how they reach audiences) where these will provide improvements for audiences.
- Urgent clarity is needed on how TV will be distributed in the future. This will allow the sector to make decisions and plan for the future.
- PSBs and the wider industry should embrace opportunities to support the sustainable production of PSM content over the longer term, including by continuing to find creative ways to fund content and diversifying pathways for the growth of businesses and skills.

# 5. Supporting audiences to find PSM content

## In this section we:

- Consider options for ensuring UK audiences can easily find and access PSM content on the third-party platforms that they increasingly use to consume news and other content.
- Focus specifically on options for giving prominence to PSM news and children’s programming on major platforms.

## Introduction

Audience habits continue to evolve and splinter as they increasingly consume news and content across a mix of digital and third-party platforms, from social media to VSPs. The PSBs and other PSM providers are rapidly evolving how they connect with audiences in this ever-shifting environment.

We focus on options that ensure audiences can easily see and find PSM wherever they are – in the first instance for PSB news and children’s programming. As digital consumption increases, there could be a case for reviewing whether prominence should extend to a broader range of content and a wider set of PSM providers.

## New viewing habits undermine prominence of PSM

Regulation has long helped audiences see and easily find PSB content on linear broadcast television. Requirements on the PSBs ensure they provide original UK productions and high quality, accurate and duly impartial news on linear services. There are also rules in place to give PSB channels appropriate prominence on EPGs.

But as discussed earlier, people are spending less time watching linear broadcast TV, which accounted for under half of audiences’ in-home viewing during 2024. This extends to news, as only 46% of audiences now watch news on PSB channels each week on TV sets (a 10 percentage point drop since 2022).<sup>94</sup> Our News Consumption Survey shows that the use of TV as a source for news is declining: 63% used broadcast TV for news in 2025 compared to 79% in 2018, while use of online services and sources has grown to 70% from 64% in 2018.

With audiences turning to online services including BVoD, SVoD and VSPs (which together accounted for 43% of total in-home viewing during 2024),<sup>95</sup> it is likely that they are consuming less PSB programming. Our analysis of what UK audiences watch on YouTube (see [Annex 1](#)) suggests that about a third of their viewing time is spent on traditional sources like TV broadcasters, film or TV

<sup>94</sup> Barb as-viewed. Adults 16+. Reach criteria: 3+ consecutive mins. Viewing of national/international and generic news on PSB channels only (live and recorded playback, excludes BVoD).

<sup>95</sup> Barb as-viewed, individuals age 4+. Percentage of total in-home video viewing (including unidentified TV set usage, minus games console use), as shown in Figure 1.

studios and distributors or music labels. It also suggests that only a fifth of their viewing time went to UK-originated content.

A growing disconnect between the PSBs and audiences threatens the future sustainability of PSM provision and with it, audiences' access to trusted and accurate news which supports democratic society. It also puts at risk their access to a breadth of programming that reflects the whole of the UK. This is a particular challenge in relation to children and younger people who, without PSM, could lose access to UK content that helps them to learn and grow, and see their lives and shared societal values reflected on screen.

Parliament decided to update the prominence of PSB content through the Media Act, which introduced an online availability and prominence regime for PSB players distributed on connected TV platforms. While we expect this to have tangible benefits for the discoverability of PSB content, these regulations will not apply to PSB content on VSPs, nor will they help audiences find PSB news on online intermediaries like social media. Extending prominence for PSB content on additional platforms that play an increasingly large role in connecting audiences with news and other content would be a natural extension of the prominence principle.

## Online platforms strongly influence what content appears to users

Online platforms determine how content and news items are presented, such as including images or text, and whether they appear mixed with other content or on a dedicated news page.<sup>96</sup> They also affect how audiences engage with content: for example, previous work we have undertaken found that news items at the top of a social media feed were viewed almost 15 times longer than those placed further down, which significantly increased the likelihood of readers remembering the articles' contents. Other research has found that the ordering of results on a search engine can affect how likely it is that people will read a news article or piece of content.<sup>97</sup> Our recent analysis (see [Annex 1](#)) found that the majority of YouTube videos watched from UK web browsers are viewed as a result of YouTube's recommender system.<sup>98</sup>

These systems can allow users to see and find content they enjoy and want to engage with, helping them navigate the large volume of information available.<sup>99</sup> [Our previous research](#) showed that social media platforms may be incentivised to curate content in a way that both keeps users on their platforms for as long as possible and encourages user interactions in order to collect more data.

These systems take a range of factors into account when curating content for individual users, including their past behaviour, such as 'liking' content and subscribing to particular creators, alongside the popularity of a creator or piece of content. We have also [explored evidence](#) that

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<sup>96</sup> There are significant differences between the ways in which search engines and social media' recommender systems work. For instance, search engines rank content from across the internet (an open database) based on the relevance to the query (as well other metrics such as trustworthiness, authoritativeness, and popularity). Social media's recommender systems autonomously curate newsfeeds based on the predicted relevance to the user from the platforms content pool (closed database).

<sup>97</sup> Previous research on this includes: Urman and Markhorthykh, 2021. [You Are How \(and Where\) You Search? Comparative Analysis of Web Search Behaviour Using Web Tracking Data](#); and Roberto Ulloa, Celina Sylwia Kacperski, 2024. [Search engine effects on news consumption: Ranking and representativeness outweigh familiarity in news selection](#).

<sup>98</sup> By recommender system we refer to an automated tool that interfaces with a library of content hosted on a digital platform to surface specific content for users. It is a type of information retrieval and ranking system that suggests content to a service user, and it is powered by a set of algorithms. For a more detailed discussion about recommender systems see [Pattern Report](#), 2023.

<sup>99</sup> Pattern Report, 2023. [Evaluating recommender systems in relation to illegal and harmful content](#).

suggests some platforms may be incentivised to boost engagement by providing users with polarising content and news diets that are narrow and contain misinformation.<sup>100</sup>

On the other hand, we have spoken with a number of platforms who have explained that they consider a range of elements when recommending content, such as providing users with a positive experience, encouraging repeat visits and limiting the visibility of content likely to breach platforms' content standards. The ways in which platforms shape recommendations can vary significantly between providers and over time.

It is difficult to understand how prominent PSM content on online platforms currently is. However, initial analysis we have recently carried out using YouTube's Data API (see [Annex 1](#)) suggests that, when searching YouTube using a range of popular news-related terms, 6% of the top ten results were from PSBs, while three quarters of the videos did not originate in the UK despite setting the search location to the UK.<sup>101</sup>

There are no requirements for online platforms like VSPs or other social media to carry PSM content, nor for the PSBs to put their content on these services, so availability on these services is not guaranteed. There are international examples of platforms considering or deciding to remove news content. For example, Meta responded to a law that requires it to negotiate financial deals with [Canadian news publishers](#) by blocking news content for users in the country. Research suggests Meta's actions increased users' exposure to low-quality information<sup>102</sup> and that Canadian news outlets lost 85% of their engagement on Facebook and Instagram, having previously relied on Facebook in particular to reach audiences.<sup>103</sup>

## In this new environment audiences should remain able to access and easily discover PSM

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To preserve universality and the societal benefits of PSB programming, it is important that providers offer their content on leading third-party platforms and viewers must be able to easily see and find it.

A wide range of stakeholders from the broadcasting sector and beyond – including PSBs, audience groups, academic researchers and the House of Lords Digital and Communications Committee – have echoed this, calling for PSM to be made more visible on the services. For example, [Channel 4](#) has specifically called for “*algorithmic prominence*” for high-quality and reliable content.<sup>104</sup> The House of Lords inquiry into the Future of News also encouraged tech platforms to give prominence to recognised news providers.<sup>105</sup>

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<sup>100</sup> Ofcom, 2024. [Online news: Research update](#), p. 14-18; Robertson et al, 2023. [Negativity drives online news consumption](#), Nature Human Behaviour, 2023.

<sup>101</sup> In some cases, the stories that will have been a large focus of news agenda on the days we were undertaking the research will have been world news stories or stories originating outside of the UK that are still of interest to UK audiences.

<sup>102</sup> ISD, 2025. [‘This content isn’t available in Canada’: How Meta’s news ban is disrupting discourse about the Israel–Hamas war](#).

<sup>103</sup> Media Ecosystem Observatory, 2024. [Information Ecosystem Brief – Old News, New Reality: A Year of Meta’s News Ban in Canada](#).

<sup>104</sup> Channel 4, 2025. [Gen Z Truth Trust and Trends](#).

<sup>105</sup> The House of Lords, Communications and Digital Committee, 2024. [The future of news: impartiality, trust and technology](#).



## Prominence has many interpretations

What ‘prominence’ means and looks like will vary across different types of services and platforms, however it typically describes practices that are designed to increase or decrease the visibility and representation of certain types of content. For example, we have discussed how the PSBs are given prominence on broadcast TV through top slots on EPGs. VoD services like Netflix are expected to give prominence to European productions under the EU’s Audiovisual Media Services Directive, such as by creating dedicated spaces on their homepages or in their catalogues.<sup>106</sup> Our work to implement the Media Act is currently exploring what appropriate prominence will mean for designated PSB players on connected TV platforms.

Prominence on online platforms refers in general to giving a particular item of content a higher ranking position within a user interface. On VSPs and social media sites this could translate to content appearing in the top five search results, in the first five recommendations or in promotional rails or banners for particular types of content.

Stakeholders, [including the BBC](#), have also called for prominence to be extended to devices that can be used to access content, such as remote controls, games consoles and mobile phones. The Government’s current position is that extending PSB prominence to smartphones and games consoles would be disproportionate, given TV viewing isn’t the primary function of these devices.<sup>107</sup> However the Secretary of State has committed to reviewing the list of internet television equipment that fall under the Media Act’s prominence provisions.<sup>108</sup>

## Prominence is particularly important for news and children’s PSM

Despite playing significant roles in society, PSM news and children’s programming each face pronounced challenges connecting with people online. We discuss below the important role these genres play in the UK, and why it is especially important that audiences can easily see and find this content on leading third-party platforms.

### High-quality, accurate and duly impartial news is vital to a well-functioning democracy

Access to high-quality, accurate news and information is essential in facilitating civic understanding and well-informed debate. While more people are consuming news through online intermediaries, levels of [trust in news](#) on these platforms is lower than it is for traditional broadcast news providers. [Our analysis](#) has also found that those using PSB news output are more likely to correctly identify important factual information, have higher levels of trust in institutions, and are less polarised than respondents who did not use PSBs.<sup>109</sup>

Audiences’ access to reliable and accurate information online is also particularly important at a time where audiences are at greater risk of being exposed to misinformation and disinformation. Our research shows that 43% of adults claim to have encountered misinformation and disinformation

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<sup>106</sup> Under Article 13(1) of the Audiovisual Media Services Directive, on-demand service providers are required to secure at least a 30% share of European works in their catalogues and ensure prominence of those works.

<sup>107</sup> Around 8% of people in the UK use a games console to watch TV/video, and only around 2% of people use one as their first-choice video-consumption device. Source: Omdia Consumer Research, November 2024. Online adults aged 18-64.

<sup>108</sup> The government said that it would review the list of devices considered to be internet television equipment under the prominence provisions in the Media Act a year after full implementation (c. 2027).

<sup>109</sup> Ofcom, 2025. [The relationship between the use of PSBs for news and societal outcomes: An empirical analysis](#).



and that 71% of that group report seeing it online, including on social media, more than on any other platform.<sup>110</sup> Reliable news from providers like the PSBs is vital to help audiences assess the credibility of news they read across multiple sources. A [recent report](#) suggests that reinforcing public service broadcasting and ensuring the availability of public interest news on social media could help protect the information supply chain.

This all underlines the importance of high-quality, reliable and accurate PSM news being readily available and visible on widely used online services.

## PSM allows children to learn, grow and see their lives reflected on screen

Children’s PSM helps young audiences learn about the UK, its diversity and the world around them. There has been a major shift in the services that children use to watch content, away from the PSBs and towards third-party platforms like YouTube. A recently published analysis found that although two PSB commissions (*Bluey* and *Peppa Pig*) featured among [the 50 YouTube channels with the most UK views](#), the PSBs’ main children’s channels did not make the top 50.<sup>111</sup>

We do not have a comprehensive understanding of how children use these platforms, including the types of videos that they watch and the likelihood of them coming across – and viewing – UK PSM content. This incomplete picture, combined with the ever-growing choice that third-party services offer, has led to concerns that children today are less likely to be watching PSM, and as such seeing less content that can help them learn and which reflects the diversity of the whole of the UK and its societal values.

In December, the Secretary of State noted the importance of children being able to “[see and find high-quality content much more easily](#)” on platforms like YouTube. There is also a risk that if people do not turn to public service content when young, they are less likely to form a connection with it as they age – jeopardising the future audience for PSM and the societal benefit it offers in terms of reflecting the whole of the UK, its diversity and bringing the country together.

## PSBs, platforms and Government each have a role to play in connecting audiences with PSM

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The PSBs must make their content available on the platforms people increasingly turn to, appealing to audiences’ changing tastes. The PSBs and platforms should urgently work together to make this content visible and easily discoverable, in particular news and children’s programming. The Government should consider whether this needs to be underpinned by legislation.

## PSBs are finding new ways to reach audiences on third-party platforms

To connect with viewers on VSPs, the PSBs and other broadcasters are continually developing and iterating their digital content and distribution strategies – considering what services to place their material on, as well as the volume and types of content to include.

In doing so, they have had to contend with a range of potential risks. We have heard concerns that when viewing a broadcaster’s content on a VSP, audiences may not be aware of its original source.

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<sup>110</sup> Ofcom, 2024. [Understanding misinformation: an exploration of UK adults’ behaviour and attitudes](#).

<sup>111</sup> However, these viewing figures relate to viewers of all ages and represent a snapshot of data that can be highly volatile and difficult for third-parties to track over time. See: E Shapiro, 2025. [YouTube: A Landscape, June 2025](#).

This lack of attribution could lead to their brands being diluted, and for publicly funded PSBs like the BBC and S4C, result in audiences underestimating the value of the TV Licence fee. We have also heard about the risk of ‘cannibalisation,’ wherein audiences swap viewing on a broadcaster’s platform in favour of a VSP, with the broadcaster potentially receiving lower advertising revenues than they would from their own platforms. Some stakeholders have told us their news content can be age-gated or deprioritised depending on the nature of the content and the platforms’ terms of service.

Channel 4 was the first among the PSBs to place content on YouTube with the intention of audiences viewing it on the platform, rather than driving viewers back to their own BVoD player. This includes uploading full episodes of programmes like *Location, Location, Location* and *8 out of 10 Cats* to YouTube, as well as creating content that is ‘native’ to VSPs and other social media through in-house digital production arm. It has said that its strategy is not leading to ‘cannibalisation’, but instead allowing it to reach new audiences. In 2022 Channel 4 agreed a deal with YouTube that allowed it to sell advertising placed against its content.

ITV has recently begun to offer a wider range of content on YouTube, including some full-length episodes that have also appeared on linear broadcast. At the end of 2024 it also agreed an advertising [deal with YouTube](#) that allows it to sell advertising placed against its content. The BBC’s main strategy had been to place content on VSPs to draw audiences back to BBC iPlayer, with the videos appearing on YouTube and TikTok tending to be more promotional, but this is changing. Channel 5 places promotional content, including clips and trailers from a range of genres, on platforms including YouTube, TikTok and Instagram.

It will take time to understand the impact that these relatively new strategies will have on PSB viewing via third-party platforms.

## Placing more news on online services and testing new formats

Our recent analysis using YouTube’s Data API suggests that the PSBs have substantially increased the number of videos they post from their primary news channels (see [Annex 1](#)). Some are also changing the format of videos they post on YouTube. For example, Channel 4 News, ITV News and STV News have all pivoted towards shorter videos since early 2023.

Some of the PSBs have told us that in addition to re-packaging content from their linear broadcast bulletins for third-party platforms, they are also creating bespoke content for these services, which they find drives better levels of engagement. Some also cover new and different stories on these platforms as a way of engaging with the different audience groups they can reach online. In discussions with us, many of the PSBs have also highlighted the care they take in continuing to uphold the standards of accuracy and due impartiality that they are required to meet with their linear content with their online news content too.

## Creating children’s content specifically for VSPs

Broadcasters’ strategies for distributing children’s content are also evolving across multiple platforms. For example, the BBC continues to provide children’s programming on its linear channels, CBeebies and CBBC, alongside BBC iPlayer and YouTube. It also embeds BBC content and personalities into popular games, like Roblox. As discussed in [Annex 1](#), Channel 5, ITV, S4C and Sky have created and developed different YouTube channels featuring their own children’s content.

The types of children’s content broadcasters make available on YouTube includes a range of clips, compilations and in some cases full episodes. The BBC is creating a series of live channels and developing content made specifically for YouTube. It has a team dedicated to understanding how

children engage with its content on YouTube and how to ensure audiences find it. As these strategies are still in the early stages the impact of children finding and watching their content on YouTube is yet to be determined.

## **PSBs will have to redouble their efforts to create content that appeals to different viewers**

The PSBs making their content available on popular third-party services is a necessary condition for audiences being able to watch and listen to it in this new environment. However, it is likely not enough: even with availability and prominence, they will need to ensure they can provide content that diverse audience groups want to watch and listen to.

When it comes to news, our [research](#) shows that fewer respondents from minority ethnic backgrounds (65%) than White adults (73%) claim to use PSB news each week, across all platforms. Trust in PSB news also varies among different demographics. Across BBC TV and online news, regular users from lower socio-economic backgrounds were less likely to score it highly for trust compared to those from higher socio-economic backgrounds. Among regular viewers of news on ITV and Channel 4, those from minority ethnic backgrounds were less likely to score them highly for trust compared to White viewers. As in 2024, almost half (46%) of the UK population say that they sometimes or often avoid news in 2025.<sup>112</sup>

The PSBs can look to build trust and engage with new or disengaged audiences through what they are doing online. If the PSBs are able to reach some of these audiences through the online platforms they are now using, or by experimenting with new and different types of content and talent, they may be able to improve trust levels while also reaching audiences who are less engaged. Ensuring they are covering relevant stories that resonate with online audiences in an authentic way is also important.

[Our research](#) has also explored attitudes to the news production process. As part of this we found that 44% of people agree with the statement that the more a story is edited, the less it is likely to be true, and 42% say that they trust eyewitness video footage more than photos or written articles. In addition, only 32% of people said that they thought journalists usually follow codes of practice to encourage accurate and ethical content. As the PSBs look to develop their online and wider news strategies they should be mindful of these findings, which underscore the importance of traditional news providers like the PSBs demonstrating the steps they are taking when producing a story to ensure its accuracy. We discuss some of the initiatives the PSBs and others have launched in this area, which may help to continue building trust, in more detail in Section 6.

The PSBs also have a role to play in ensuring that their content appeals to an ever-growing range of tastes from children and young viewers who were early adopters of platforms like TikTok and YouTube, to older audience groups who are spending a growing amount of time watching content on YouTube including on the TV. Achieving this is not straightforward. For example, it will require them to trial new distribution methods and formats and assess how wide a target audience their different brands and programmes should aim to reach. They will need to continue to consider whether and how to incorporate certain attributes into their content that different audience groups find appealing – for example ‘authenticity’ which some younger audiences value.

The Media Act has given PSBs more flexibility and freedom in the services they can use to fulfil their remits. We have proposed that the PSBs will need to report on if and how they plan to use online

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<sup>112</sup> Reuters Institute for the Study of Journalism, 2025. [Reuters Institute Digital News Report 2025](#), p. 27.

services to contribute towards the delivery of their remits in their [Statements of Programme Policy](#) (“SoPP”). We will then be able to take such contributions into account in future PSM Reviews.

## **Platforms and PSBs should do more to help audiences see PSM**

It is critical that audiences can see and discover PSB content on third-party platforms. In the first instance it is important that the PSBs and YouTube work together to ensure PSB content is prominent on its service for UK users. The PSBs should also work with other platforms to ensure their news content can continue to connect with all audiences. Platforms should be transparent with the PSBs about how they can make the best use of features and functionalities to ensure their content reaches UK audiences. They should also offer advice and support on how the PSBs can make effective use of relevant content insights and analytics to understand why and among whom their content does, or does not, perform well.

### **They can improve PSM visibility by building on some existing measures**

Some online platforms already partner with PSBs, other broadcasters, publishers and producers. YouTube has told us that it works closely with its partners so that they can get the most out of the platform, including through discussing their YouTube strategies, and by providing them with operational support, bespoke training and data on how their content is performing.

We know that it is technically possible to design recommender systems to give certain types of content greater visibility. This could include algorithmically promoting types of content based on a variety of signals. In relation to news, this could include integrity signals relating to the quality, trustworthiness, and authoritativeness of content. For example, YouTube states that it promotes some “authoritative sources” when audiences search for news-related topics and topics prone to misinformation.<sup>113</sup> This can include the PSBs, alongside other UK and international news brands.

For users based in the UK, we think that it is important that online service providers recognise the PSBs as credible and authoritative sources of news content. We encourage them to take reasonable and proportionate steps to ensure that relevant news content from the PSBs is suitably prominent in search results, and that when their algorithmic systems are recommending and presenting news content to UK users that the PSBs’ news content is prominent.

Platforms like YouTube could also build on existing practice to promote children’s PSM to UK users. YouTube provides children’s content both on its main application and on YouTube Kids – a separate app which only features children’s content that has passed a series of requirements and thresholds, and which offers further parental controls. The platform has a series of content quality principles for its children’s creators, the use of which can influence how that content is recommended, influence its admission onto YouTube Kids, and in some cases affect monetisation agreements. This could form the central plank of any partnership between platforms and PSM providers.

### **Platforms should also consider measures that offer users more choice over what they see**

There are additional steps platforms could consider taking, such as giving users greater control over the content that is presented to them. Our [previous work on media plurality](#) has highlighted different ways in which this could be delivered, including: 1) allowing users to set content preferences, including in relation to the types of content or providers they want to see (e.g. this could allow audiences to actively opt to see more news from the PSBs, or other high-quality

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<sup>113</sup> [YouTube - Authoritative news and information](#) accessed on 16 July 2025.

commercial news and local news providers if they would prefer); 2) allowing users to choose different recommendation experiences/feeds (e.g. content or news reporting on a current issue, a thematic feed, or a personalised feed); and 3) using labels to support users in making informed choices when engaging with content including news.

We have previously considered the effectiveness of [different user empowerment tools](#) and found that, if well-designed and deployed at the right time, they can help users make choices that align with their preferences.<sup>114</sup> However, these tools can bring challenges, including whether users have the right information to make such choices, whether they experience choice-overload, and users' individual behaviours and the context in which they are using a service. Giving users greater choice and control over their online experience is also one of Ofcom's priorities for implementing the OSA. The OSA includes specific duties for online service providers designated as 'Category 1' – the largest and most risky services. These providers will need to take additional steps, in addition to their core duties relating to illegal harms and protection of children, to offer adult users features that reduce the likelihood of encountering certain types of legal content, such as hate and abuse.<sup>115</sup> Once Ofcom implements these duties in full, these platforms will need to put in place user empowerment measures.

Stakeholders including Channel 4 have suggested that labels and kitemarks can help audiences identify reliable news and content. We note that some industry kitemarking initiatives already exist, although take-up of these is variable, and there is limited evidence on the impacts they have on users. Some news publishers see their brand as their kitemark and have raised concerns about the impact a kitemarking system, particularly one with any Government oversight, could have on their independence. To help audiences distinguish accurate information from information that is false or misleading, some platforms use independent fact checkers or crowdsourced fact-checking.

## **Government should consider new regulation to ensure audiences can easily find and consume PSM content, including news**

Government may wish to consider legislation that extends the longstanding principle of PSB prominence to YouTube, and potentially other platforms that play a central role in shaping the news audiences see.<sup>116</sup> They could also consider expanding the PSM framework to include new providers that offer genres which are underfunded or at risk of not being made in future.

There are some international efforts in this space: in 2021 the Council of Europe published guidance on [how states could introduce measures that ensure the prominence of public interest content online](#). The EU is currently considering regulatory options for prominence for public interest content on VSPs to improve media plurality and counter disinformation.

### **Defining the scope and shape of prominence online is complex**

Securing prominence for PSM content on third-party platforms for UK audiences would raise several issues. These include criteria for establishing the platforms on which prominence should apply, the

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<sup>114</sup> Ofcom, 2024. [Understanding Online Choices, Preferences, and Welfare](#).

<sup>115</sup> [Section 16\(4\) of the Online Safety Act](#): the user empowerment duties capture legal content that is abusive and the abuse targets race, religion, sex, sexual orientation, disability, or gender reassignment. [Section 16\(5\)](#): the user empowerment duties capture legal content that incites hatred against people: of a particular race, religion, sex, or sexual orientation; who have a disability; who have the characteristic of gender reassignment.

<sup>116</sup> We focused our recommendations on YouTube because it plays a significant and growing role in connecting audiences with content, including on the TV set. However, any future regime would need to be sufficiently flexible to potentially apply to other platforms to reflect changing audience habits.

providers that could benefit, the specific types and forms of content that should be made prominent, how prominence could be delivered, and whether to include ‘must-carry, must-offer’ requirements. Government would also need to consider whether user empowerment could be factored into any regime, so that audiences who do not want this content promoted to them would be offered a choice. Finally, the regime would need to be flexible enough to respond to changes in technology, such as how content is served to audiences.

As part of any work to secure prominence for PSM content, Government may want to consider whether the PSM framework should be expanded to include new providers. For example, a stakeholder suggested expanding the PSM framework to include a new provider to enhance existing provision, particularly for genres where we have concerns about plurality and future provision.

A prominence regime specifically for news would need to balance the objective for a diverse and plural sector with the reality that not every provider can be prominent. It would be important that promoted content is regulated and meets specific content standards. We consider that the PSBs are a good starting point – they are some of the most trusted news entities, have requirements to provide news and information and are regularly assessed in their delivery of these requirements, and already meet high standards including due impartiality and accuracy. As news consumption habits shift towards third-party platforms, there could also be merit in giving prominence to a limited number of additional UK providers, should they be willing to meet particular requirements and standards. Ultimately the decision of who to grant prominence to, and the criteria for this, would be for the Government.

Many of these considerations would also apply to prominence for children’s PSM. Government would need to consider the criteria for prominence beneficiaries: for example, PSBs and other broadcasters whose linear programming falls under the broadcasting code, or a wider group of providers, whose content must meet a different set of criteria. Which content should be made prominent – for example individual videos or ‘channels’ run by providers who meet the relevant criteria – would be another consideration. This is a particularly important question for children’s content given that some programmes originally commissioned by the PSBs but offered online through their production arms – like *Bluey* and *Peppa Pig* – are some of UK children’s most-watched YouTube channels. Government would also need to work with platforms to ensure that only relevant viewers see children’s PSM prominently positioned on their screens, which could be linked to the user-empowerment measures described above.

We are aware that designing prominence measures for online platforms would impact on how content feeds are managed. Ofcom has undertaken its own research, and there have been a variety of controlled trials undertaken by academics, which explore the effects of making changes to users’ content feeds. These studies have shown that interventions can have mixed results.<sup>117</sup> In some cases, interventions had a mix of ‘good’ and ‘bad’ effects which highlights the importance of testing any service changes before implementation.

We will provide the Government with support if it decides to explore the prominence of PSM content and news on third-party platforms. In the meantime we will continue to gather evidence on audience viewing on online platforms and will engage with stakeholders to understand what content is served to different audience groups.

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<sup>117</sup> Ofcom, 2024. [Online News: Research Update](#), p. 22-24



## The Government could also consider new powers to support prominence

New regulation could help ensure that online platforms provide greater transparency in how they design their recommender systems. We have [previously set out the case](#) for more transparency into how news content is ranked and presented to UK users. The House of Lords inquiry into the future of news also recommended that Ofcom should be given “*the necessary powers to investigate tech firm recommender algorithms and the operations of large language models.*” The lack of transparency in this area has been highlighted as a concern by the [Council of Europe](#) and the [Organization for Security and Co-operation in Europe](#) (OSCE).

Providing regulators with greater transparency about how recommender systems are designed, alongside powers to test and trial different choice architecture and related recommender systems would help to identify options that support users in finding reliable information. This could also provide an evidence base to help design any future prominence regulation. If a prominence regime were introduced, transparency obligations for in-scope services would likely be needed in order to test proposed interventions before they are introduced, monitor compliance and assess effectiveness of the regime.

## Conclusions on supporting audiences to find PSM

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As audiences turn to third-party platforms like VSPs and social media for news and other content, they are likely to be seeing and consuming less PSB programming. This declining consumption puts the sustainability of PSM at risk, and with it, audiences’ access to a breadth of content that reflects the diversity of the UK.

To ensure they are able to see and find PSM in this new environment, it is vital that audiences can easily see and find this content on platforms that now play a lead role in connecting people with news and other content. This is particularly important in the first instance for PSB news which, as trusted, accurate and duly impartial sources, plays a role in supporting democratic society. It is also important for UK children’s content, which helps young people to learn, grow and understand both the UK and the world around them, and can also help young people build a connection with PSM for the future.

As viewing habits shift online, it may be necessary consider how prominence measures could be expanded to cover a wider set of PSM genres and providers. This could include expanding the PSB framework to include additional providers, particularly where they can support genres that are underfunded or at risk of not being made in future.

Responsibility for providing audiences with the ability to see and find PSM on third-party platforms is a shared one: the PSBs will both need to make content available and amplify their efforts to make programming that appeals to viewers’ changing tastes. The PSBs and platforms should work together to make PSB content prominent and to understand its appeal with different viewers. The Government should consider whether these efforts need to be underpinned by legislation.



### Recommendations:

- The PSBs need to keep adapting to audience preferences by constantly challenging themselves to test and iterate new ways of distributing and creating content for diverse audience groups.
- It is critical that the PSBs and YouTube work together to ensure that PSB content is prominent on its service, and on fair commercial terms. This is important for PSM to continue to connect with all audiences, particularly for news, which supports democracy, and for UK children's programming which helps young audiences learn and grow.
- The Government should consider whether this needs to be underpinned by legislation. This would require significant work but would give prominence for PSB content on YouTube statutory backing, just as the Media Act provides PSB players prominence on connected TVs and other devices.
- More widely, the Government may wish to explore prominence for news on social media and other platforms, even though implementation would be complex and would need to reflect the different ways that platforms promote content to users. In the meantime, the PSBs need to work with other VSPs and social media platforms to ensure their content is available and easily discovered by users.

# 6. Empowering audiences in a digital age

## In this section we:

- Outline how technological developments such as AI will continue to change the ways in which content is made and presented to audiences, and the impact this might have on audiences' abilities to access and trust PSM.
- Highlight the important role media literacy plays in ensuring audiences can navigate new ways of accessing content.
- Discuss how everyone has a role to play in helping audiences build and enhance their media literacy skills and knowledge.

## Introduction

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This section sets out some of the ways in which technology continues to evolve, and the impact this could have on audiences' ability to access and trust PSM content in the future. In particular, we focus on the developments in AI and the impact these are having within the news sector.

Changes in the way audiences access and interact with content also mean that media literacy skills are more vital than ever. Audiences need to have the confidence and ability to access PSM content, particularly on new services and devices. They also need the critical thinking skills to navigate news safely and discern PSM news from other forms of online information.

## Technological developments continue to change the way in which content is made and accessed

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Over time, we have seen developments in technology change how audiences can access television content. As highlighted in our [Future of TV Distribution report](#), satellite and cable TV services provided audiences with a greater choice of channels, while digital switchover<sup>118</sup> meant terrestrial television went from offering five channels to dozens. BVoD players and streaming services have since opened up even more choice for audiences consuming content over the internet, and via connected devices, and more recently, as we have discussed throughout this report, there has been growth in the use of VSPs and other online services to watch and listen to content.

Newer technological advances in AI are also changing the ways in which content is created and presented to audiences. While the use of AI is by no means new to the broadcasting and media sector, we have seen significant innovation and adoption of AI technologies in recent years. These have the potential to drive better outcomes for consumers and businesses across the media sector. For example, in our recently published [Strategic Approach to AI](#), we highlighted how AI is helping to improve accessibility by generating real-time captions, translating content into multiple languages,

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<sup>118</sup> The digital switchover was the process of changing the UK's television broadcasting from analogue to digital. It took place on a region by region basis between 2008 and 2012.

and providing automated dubbing and audio descriptions to support all audiences to engage with media. We also discussed earlier that some production companies have signalled they are already using AI or plan to use it in the near future. As this technology evolves it is likely there will be other significant developments in how content is created and consumed. For example, agentic AI, which enables the accomplishment of tasks with minimal human supervision, could start to change the ways in which audiences access content, and [agentic AI tools are also starting to be developed in the media industry](#).

When looking at the news industry, we are seeing particular disruption and evolution, especially through GenAI.<sup>119</sup> For example: some news providers are using AI to more efficiently create content and generate headlines; the widespread availability of synthetic news summaries created by GenAI tools; and bad actors exploiting the technology to create convincing mis and disinformation. It is important to harness the opportunities that this technology presents while managing the potential risks it poses.

## **As news providers draw upon the opportunities AI tools present, they must seek to retain audience trust**

The PSBs and traditional broadcasters consistently perform better on perceptions of trust and accuracy compared to social media overall.<sup>120</sup> However, the increasing usage of AI within the news sector presents challenges in retaining trust and audiences' relationships with news brands.

News audiences have indicated that they have some reservations about the use of AI by news producers. [Our research](#) shows that approximately half (52%) of users said they would trust an online article written by AI less than one written by a human. In the [2025 Reuters Digital News Report](#), UK adults were among the least comfortable, compared with other countries, with the idea of using news produced 'mostly by artificial intelligence (AI) with some human oversight'; only 11% were comfortable with this, and 64% were uncomfortable.

Many news providers are starting to explore and trial GenAI tools. Most still claim to have some level of human oversight in their use of these tools, although this could change over time. The [BBC has also recently announced](#) plans to combine AI with BBC journalism to create a new fact checking tool.

Transparency around AI use in the sector is key. As we noted in December, the BBC has published its approach to GenAI and we encourage other publishers to share detailed approaches. The PSBs should continue to be open about their policies on AI use and be transparent with audiences where AI has been used in the creation of its news content. We expect all PSBs to uphold high standards in their use of AI, setting the bar for others in the industry.<sup>121</sup>

## **Generative news summaries present particular challenges**

Audiences are also experimenting with using AI tools to consume news, particularly GenAI news summaries, though they have some reservations. In one survey, 36% of respondents said they would

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<sup>119</sup> AI models that can create text, images, audio and videos in response to a user prompt.

<sup>120</sup> Ofcom News Consumption Survey 2025.

<sup>121</sup> PSM has been highlighted as being able to play a pioneering role in developing journalistic AI, see Council of Europe, [Guidelines On The Responsible Implementation Of Artificial Intelligence Systems In Journalism Discussion](#), 2023.

consider using GenAI search tools to summarise top news stories, but around a quarter (26%) of users said they would instead prefer to go to known sources like news websites.<sup>122</sup>

News providers have been clear about the risks to the delivery of reliable news posed by GenAI synthetic news summaries from chatbots, search results, or device notifications. They have highlighted the impact of inaccuracies and hallucinations (AI generated responses that are incorrect or nonsensical). For example, [BBC News](#) and [Sky News](#) both noted significant flaws in Apple Intelligence’s AI generated news notifications which were suspended in early 2025 after several weeks of errors. [The BBC has also carried out research](#) where it claims to have found ‘significant issues’ with half (51%) of the answers generated by AI assistants when asked questions about the news.

Any errors in the outputs of AI generated news summaries risk misleading audiences. In some cases, these could result in harmful consequences, especially if the errors relate to sensitive topics such as health advice or political issues. They can also affect the sourced news publishers, impacting the trust audiences have in them, and damaging their brands. Some stakeholders have highlighted that there is a possibility audiences could start to rely on these summaries rather than accessing full pieces of content from news providers and that this could have implications for readers’ understanding of complex issues, as well as traffic to publishers’ websites, and their sustainability (as discussed in Section 4).

Stakeholders have highlighted several factors that they consider would make AI-generated news summaries more compatible with the delivery of reliable news and to show what a good model for the use of these tools could be. These include stakeholder suggestions for [publishers to have control](#) over whether and how their content is used, [LLMs needing to use and pay](#) to license public service content as training inputs, [content being clearly labelled](#) as AI generated to help users make informed choices which can also support source attribution, and for [AI assistants to be accurate and follow basic editorial standards](#) when answering questions about the news.

## Media literacy can help audiences find content online

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Ofcom defines media literacy as the ability to use, understand and create media and communications across multiple formats and services. Ofcom has media literacy duties (as set out in the Communications Act 2003 and updated in the OSA) to promote media literacy and to encourage and support others to carry out media literacy activities.

The ever changing media environment can present challenges for audiences in navigating, finding and consuming PSM content. It is therefore critical that audiences have the right skills and knowledge to be able to do this.

## Supporting audiences to use and access content online

Audiences are only able to consume and benefit from the volume of PSM content online, if they have access to broadband and connected devices, and the skills and knowledge to be able to use and navigate these services. Ofcom sees these digital skills, and digital inclusion, as closely related to media literacy.<sup>123</sup>

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<sup>122</sup> Thinks Insight & Strategy for the Digital Regulation Cooperation Forum (DRCF), 2025. [Understanding Consumer Use of Generative AI](#).

<sup>123</sup> Ofcom, 2024. [Media Literacy Outcomes, Indicators and Survey Questions Bank](#).

[Recent work carried out by DCMS](#) indicates that most people may be “comfortable setting up and using IPTV independently, but a smaller group – primarily older individuals or those with low digital confidence – felt they would struggle.” [Our evidence](#) shows that a lack of skills and confidence can be a barrier to getting online and that ‘narrow internet users’ (people who conduct only a small number of tasks online despite having connectivity) are more likely to struggle with media literacy.

Audiences who lack confidence online are more likely to face challenges in accessing PSM content online, and may benefit from targeted media literacy interventions – in addition to those who are going online for the first time. The PSBs and other traditional broadcasters have strong relationships with these audiences (particularly older audiences) and so have an important role to play in supporting less digitally confident audiences to access online content and services. Sky Up’s digital hubs programme (which partners under 25s, and over 65s, with local community organisations across the UK to support underserved areas with digital upskilling), is a good example of the type of work that can be done to assist vulnerable groups.

As Government is considering the future of TV distribution, it will be important that all organisations involved in every part of the complex process of delivering any future changes play their part in ensuring audiences are prepared and have the skills they need to navigate new routes to access and consume content.

## **Helping audiences to protect themselves from misinformation and disinformation**

Media literacy can support the understanding of how news is gathered and produced, enabling people to better identify trustworthy and accurate content online. Ensuring audiences have the right skills and knowledge so that they can navigate news online and protect themselves from mis and disinformation is vital, and a range of stakeholders have emphasised its importance.

We outlined some of the potential consequences and dangers that the proliferation of misinformation and disinformation online poses to democracy in December. In our latest research, 49% of online communication platform users claimed to have seen untrue/misleading news stories, an increase from 45% in 2024.<sup>124</sup> While 34% took action by reporting it to the site/app, 40% took no action and 13% chose to share the story on their own social media to let their followers know that they thought it was misleading or untrue, an action which may inadvertently help to spread the misleading or untrue information further. Internationally, [the recent Federal election in Canada saw AI-generated misinformation](#) on political news topics spreading, some designed to look like content from the national PSB, CBC/Radio Canada, to trick audiences into engaging with it.

The PSBs and other broadcasters are in a unique position to help support audiences and equip them with the skills to critically assess the news they see online, and be able to identify trusted and reliable information. This is because they reach and have relationships with a large proportion of the UK, they operate across a range of platforms, and are generally highly trusted. Each has strong relationships with different audience groups and can look to play to these strengths to engage audiences with tailored media literacy content and digital skills support.

We have met with a range of broadcasters to understand the media literacy initiatives and activities they are already undertaking, particularly in relation to news literacy. This work has identified four main types of activity:

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<sup>124</sup> Ofcom, 2025. [Adults' Media Use and Attitudes 2025](#) p.4.

- **Delivery of online, in person or hybrid live lessons or workshops.** Sky, BBC and STV all engage with audiences in this way. For example, through Sky's 'Sky Up Academies' programme young people visit their news studios to understand the process of making news. STV's Expert Voices initiative offers media workshops designed to increase the diversity of its news and current affairs programmes, and are targeted at underrepresented groups.
- **Fact-checking initiatives.** BBC Verify is the BBC's brand for fact-checking, verifying video, countering disinformation and analysing data. It's output features in linear news bulletins, on the BBC news website and app, and is also posted on social media channels. Channel 4 also has its FactCheck Channel 4 News resource which analyses and verifies claims made in the news media.
- **Online resources such as quizzes, teaching materials and interactive learning materials.** Examples include the BBC's Other Side of the Story programme which produces content for young people such as explainers and quizzes, as well as resources for teachers on media literacy for the BBC Bitesize website.
- **Using a range of programming to encourage critical engagement.** The scope for broadcasters to support critical engagement within their content often extends further than just news. For example, magazine programmes discussing scams, a plot about an internet conspiracy theorist in a drama, or a soap story about privacy of data online, can all support audiences' media literacy. Every broadcaster we spoke with had examples in this area.

## Everyone has a role to play

In our [Three-Year Media Literacy Strategy](#) we set out that media literacy is everyone's business. We encourage the broadcasters to continue to build on the important work they are doing. Alongside providing high-quality, accurate and duly impartial news, the PSBs in particular can play an important role in explaining why reliable information is important in a democratic society and the contribution their news content makes to a healthy information ecosystem. There may also be opportunities where the PSBs could work together on media literacy initiatives, enhancing the scale of delivery.

Embedding media literacy techniques into journalism and explaining to audiences how content is put together is a specific approach broadcasters could continue to use, which we believe in the long term is likely to engage audiences and build trust.<sup>125</sup> Research shows that [greater transparency about newsgathering processes](#) can increase engagement and trust. Given its remit to support learning for people of all ages the BBC also has a particular responsibility. Through BBC Verify it is already using explainers to demonstrate the process of putting stories together and it is continuing to expand this service. For example, it recently launched its [BBC Verify live page](#); an experimental format where journalists share their work – including fact checking, analysis and the process for debunking misinformation – throughout the day by way of a real-time live news feed. It has also stated that it plans to grow its presence on platforms such as YouTube and TikTok.<sup>126</sup> It is also considering how it can further support [young people's digital literacy skills](#) so they can better assess trusted information and recognise disinformation.

The European Broadcasting Union found in 2023 that [just over half of its members were involved in media literacy work](#). In France, PSBs are required to promote media literacy and report on their

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<sup>125</sup> School of Media and Communication, University of Leeds, 2022. [Research reveals link between lack of trust in journalism and low levels of public news literacy](#).

<sup>126</sup> [BBC Annual Report and Accounts 2024/25](#) p.115

activities to the media regulator Arcom, which publishes a report every year that highlights best practices and makes recommendations.<sup>127</sup> In Belgium, the PSB for the Flemish Community, VRT, is required to help increase the media literacy levels of all Flemish citizens as part of its educational remit.<sup>128</sup> In this spirit, in our [proposed SoPP guidance](#) we encouraged the PSBs to showcase what they are doing to support media literacy in their annual SoPPs.

Online platforms also have a role to play and should enable media literacy by design. In the autumn we will publish a statement of recommendations under the OSA, setting out how platforms and broadcasters can empower their users to understand and engage with online media and services. In Section 5 we also encouraged the PSBs and online platforms to work together to make PSM content more visible. Any steps they take to do this would be more effective if they also help audiences understand the news they are seeing. For example, if online platforms looked to give users more choice in the content that is shown to them, it would also be important for them to think about how they can ensure audiences are sufficiently informed to make any changes and understand how such changes would affect their feed. There could also be a strong incentive and role for the PSBs and other news providers in educating their audiences about these tools.

In our Local Media Review, we highlighted that there can also be benefits to a grassroots approach to media literacy that engages with communities and recommended that local news organisations develop news literacy programmes in conjunction with their communities. The recently launched [Co-Creational Media Toolkit](#) by the Public Interest News Foundation and its partners is a practical and action-oriented contribution to the discussion on how communities can be engaged in news production and dissemination while maintaining high journalistic standards.

Governments, in Westminster and the nations, can also ensure that the modern education system gives children and adults the skills they need for the future. We are ready to work with the PSBs and platforms, and support the Department of Education and devolved administrations in their efforts to deliver media literacy.

## Conclusions on empowering audiences in a digital age

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How audiences can access, consume and engage with content will continue to change, especially with developments in technology like AI. It is therefore critical that audiences have the skills and knowledge to continue benefitting from the provision of PSM, and everyone needs to play their part to help deliver in this space.

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<sup>127</sup> Edwards, L., Obia, V., Goodman, E., Spasenoska, S. (2025). Cross-sectional challenges to media literacy: case studies. London School of Economics.

<sup>128</sup> Ibid.



### Recommendations:

- The PSBs need to invest and contribute to media literacy in the UK and use their distinctive and trusted relationship with audiences to give them confidence to use digital services.
- The BBC plays a further role, supporting media literacy through its children's education initiatives. It is also considering how it can further support young people's digital literacy skills so they can better assess trusted information and recognise disinformation.
- Alongside broadcasters, online platforms including social media and VSPs, should enable media literacy by design. This autumn Ofcom will publish a Statement of Recommendations under the Online Safety Act, setting out how online platforms and broadcasters can empower their users to understand and engage with online media and services.
- Ofcom has longstanding duties to promote media literacy and support others to carry out media literacy activities. But when it comes to the curriculum and education spending, it is for Governments – in Westminster and the nations – to ensure that the modern education system gives children and adults the skills they need for the future.

## 7. We are committing to update our regulation of broadcast TV and radio

**It is important that our regulation is flexible** and able to respond to market developments while protecting audiences as they shift their viewing and listening online.

Regulation must be proportionate, consistent and targeted only where it is needed. **We will strip away any outdated and unnecessary restrictions** and set regulation to **encourage growth and innovation**. Some of this we will be able to implement ourselves and where appropriate, we will consult on any changes. In other areas, legislative change may be needed.

We are already implementing the vital Media Act changes, which is the biggest update to the public service media framework in the last two decades. This includes **securing prominence for PSB players on connected TVs** and enhanced content standards regulation on certain on-demand programme services.

However, the **requirements we are able to put on the PSBs remain largely based on their linear TV services** (aside from the BBC). We will look at what **further reform is needed** to ensure regulation supports all audiences benefitting from PSM content in the future, including the need for PSBs to reach online audiences and the relationship between PSBs and the UK production sector. We will also work with the Government on the BBC Charter review and the future regulation of the BBC, which is central to PSM.

The Government's decision on the future of TV distribution will also have implications for sector wide regulation. **It is urgent that all stakeholders have clarity on how TV will be distributed in the future** as there would be a significant amount of work involved in the planning, investment and innovation needed to manage an inclusive transition. Regardless of the outcome of this decision, we will review the **regulation across linear and online services** to determine if greater consistency is needed to **protect audiences from harm** no matter where they are watching and listening.

Following this publication, we will seek input from stakeholders about their priority areas for reforming regulation and supporting the future provision of PSM content. **Before the end of the year, we will publish a comprehensive call for evidence on the work we are intending to do.**

## 8. Glossary

**AVoD** – Advertising-supported video on-demand. On-demand/streaming services that include advertising and are not affiliated with broadcast TV channels (distinct from BVoD).

**BVoD** – Broadcast video on-demand. Video on-demand services provided by linear TV channels. Examples of BVoD services include BBC iPlayer and My5. Such services typically include programmes previously broadcast on linear services and, increasingly, programming that has not yet been broadcast or is only intended for the BVoD service.

**CAGR** – Compound annual growth rate. It measures the mean annualised growth rate over a given period.

**DTT** – Digital Terrestrial Television. It sends TV content to homes over radio spectrum via an aerial.

**IPTV** – IPTV is TV-like content delivered over the internet, including on-demand streaming services and internet-based linear propositions.

**Linear TV** – Refers to content that is broadcast according to a schedule. It can be watched either live (at the time it is scheduled) or delayed by pausing live TV or using a recording device. It excludes on-demand/streaming services.

**Multichannels** – The multichannel sector consists of all television channels, other than the PSB main and portfolio channels, that are broadcast in the UK.

**Nominal terms** – Data presented in nominal terms has not been adjusted to account for inflation and may be historical

**Online intermediary** – Online intermediaries are services that operate between the publisher of online content, for example news content, and users which access the content in question via the intermediary service. Such services may organise how the content is displayed, tagged or sequenced. Types of online intermediary include: search engines, news aggregators and social media.

**Public Service Broadcasters** – The Public Service Broadcasters in the UK are the BBC, those providing the Channel 3 services, Channel 4 Corporation, the Channel 5 licensee and S4C. While all BBC public service television channels are PSB channels, only the main channels of each of the other PSBs have this status. They have a collective duty to fulfil nation purposes and objectives.

**Public Service Media** – A wide range of content on linear, BVoD and online services that is of high quality, reflects the whole of the UK, and brings audiences together. It includes high-quality, trusted, accurate news.

**Real terms** – Data presented in real terms has been adjusted for inflation (measured using the Consumer Price Index)

**SVoD** – Subscription video on-demand. On-demand/streaming services that are only available on a paid-subscription basis. Examples include Netflix, Amazon Prime Video and Disney+.

**VoD** – Video on-demand.

**VSP** – Video sharing platforms. Online video platforms which allow users to upload and share videos with the public are classed as VSPs, even if they are funded by subscriptions or advertising. These include YouTube, TikTok and Twitch.