



Consultation response: Media Green Paper

Bectu briefing • August 2026

About Bectu

Bectu is a sector of the trade union Prospect, representing around 40,000 workers in non-performing roles across the creative industries, including film, television, theatre, live events, fashion, gaming and cinema.

Question 1. The green paper covers topics relating to the future of UK television and media. More specifically, it includes content on:

- the current market and audience context
- prominence of news and of public service media
- future of TV distribution and regulation
- a new system for public service media
- media literacy

What are your overall views on the future of television and media in the UK, related to the topics in this green paper?

Bectu broadly agrees with the Green Paper's assessment of the challenges facing UK media, including the growth of global platforms, changing audience behaviour, the transition to IPTV, and the need to ensure trusted public service content remains visible and accessible. We welcome its recognition of the cultural, democratic and economic value of public service media and the role it plays in supporting trusted news, social cohesion and UK-originated content.

The role of public service media in holding up the wider creative industries is clear through understanding its workforce. In a recent survey of 600 Bectu members, in the past five years, 34% of all members have worked on a BBC commissioned production, 20% have worked on a production made by BBC studios, 20% have worked on a production funded, co-funded or distributed by the BBC and an additional 5% have worked on a production for an indie closely linked to the BBC.

However, the Green Paper gives insufficient attention to the workforce implications of these changes, as it is this workforce who are the backbone of the television and media, and directly impacted by both the changing landscape, and by how Government decides to respond. The creative industries contribute around £125 billion annually to the UK economy and support 2.4 million jobs, while public service broadcasting acts as a key piece of creative infrastructure. The BBC alone contributes £4.9 billion to the UK economy and supports more than 53,000 jobs.

But across television and media, workers are facing increasing insecurity as a result of reduced commissioning, broadcaster cuts, organisational restructuring and wider market pressures. The BBC has seen nearly a 40% drop in inflation adjusted public funding for UK facing services since 2010, while for public service broadcasters who rely on advertising face a complex set of

challenges driven by shifts in viewer habits toward streaming alongside wider macroeconomic pressures.

Over the last 15 years, television's total share of the UK advertising market plummeted from 30% down to just 11.4%¹. ITV saw a 5% drop in total advertising revenue in 2025², while Channel 4 saw a 9.2% decline in linear advertising revenue in 2025.

These challenges come at a time when the sector is already grappling with skills shortages, retention challenges and growing concerns about workforce sustainability. In the same survey, 67% of workers in broadcasting said they feel less secure at work than a year ago, 74% said that the outlook for the industry they work in is worse than a year ago and 76% reported a decline in morale at work over the last 12 months. Workers in broadcasting have also reported huge rates of restructuring, with over 60% reporting redundancies (63%).

These pressures are also contributing to greater consolidation across the media sector, raising important questions about plurality, competition and the diversity of voices available to UK audiences. Recent reports regarding a potential sale of ITV, alongside the growing scale and market power of major broadcasters, streamers and platform operators such as Sky present long-term challenges for the wider media landscape. While consolidation and partnership may offer financial stability in the short term, they also risk concentrating commissioning power, reducing the diversity of editorial and creative voices, and limiting opportunities for independent producers and new entrants.

A healthy media ecosystem depends on a plurality of institutions, commissioners and content providers. Protecting a diverse range of voices is not only important for audiences and democracy, but also for maintaining a vibrant production ecosystem and supporting creative jobs throughout the UK.

Changes in audience consumption are also reshaping the nature of media work. The growing emphasis on platform-first, digital and short-form content is often accompanied by faster production cycles, increased output requirements and growing expectations for workers to deliver content across multiple platforms. While innovation is essential, these developments can contribute to work intensification and place additional pressure on workforce wellbeing, training opportunities and editorial quality.

Ultimately, the success of future media policy should be judged not only by how audiences access content, but by whether the UK continues to sustain a diverse, resilient and internationally competitive creative ecosystem capable of producing it. The future sustainability of UK media therefore depends not only on distribution, discoverability and regulation, but on maintaining a skilled, secure and properly supported workforce capable of producing the diverse content on which the sector relies.

Market and audience context

Question 2. Chapter one of the green paper describes a series of challenges impacting the UK's TV production ecosystem, including:

- **the spending power of public service media (PSM) providers is decreasing, which impacts their ability to commission new content**
- **the sector faces rising production costs and inflationary pressure, particularly for high-end content like drama**
- **PSM providers are adopting 'fewer, bigger and better' commissioning strategies, often prioritising digital-first content, which has resulted in fewer commissions for some genres**

¹ <https://www.warc.com/en/data-benchmarks/expenditure-report>

² <https://www.itvplc.com/~media/Files/I/ITV-PLC-V2/downloads/annual-report-2025.pdf>

- when global streaming platforms commission directly, they typically retain the IP. This inward investment, while filling production expenditure gaps, risks shifting the residual commercial value offshore, creating a challenge for producers to retain IP and long-term economic value
- screen-based businesses report unmet finance demand and feel underfunded, despite a high rate of actively using external finance

What measures do you feel would be most effective for the government to take to overall address these challenges?

Bectu agrees with the Green Paper's assessment of the challenges facing the UK's television production ecosystem. Taken together, these issues point to a broader challenge: ensuring the long-term sustainability of UK-originated content, public service media, and the highly skilled workforce that underpins them.

The combination of reduced commissioning, organisational restructuring and workforce insecurity demonstrates that many of these challenges are already being felt by workers across the sector, and should therefore be considered not only as market challenges but as workforce challenges.

We believe the most effective measures Government could take are:

- **Strengthening public service media:** Many of the challenges identified in this Green Paper cannot be separated from the future role and sustainability of the BBC. Public service broadcasters remain the single most important commissioners of UK-originated content and play a critical role in skills development, regional growth, creative risk-taking and workforce development. Government should ensure that public service media providers are able to continue investing in original content and that the benefits they receive, including prominence, remain meaningful and effective as audiences migrate online.
- **Supporting domestic commissioning and content investment.** Public service broadcasters remain among the most important sources of investment in the UK's independent production sector and provide opportunities for creative risk-taking that may not otherwise be supported by purely commercial commissioning models. But a combination of broadcaster cuts, rising production costs and a slowdown in commissioning has had significant impacts throughout the production ecosystem. Policy should support sustainable levels of investment in UK-originated content across a range of genres, rather than encouraging a concentration of spend on fewer productions. This should include encouraging a fair and meaningful spread of production activity across all regions and nations. Commissioning decisions have impacts far beyond individual productions, supporting local talent pipelines, supply chains and creative clusters across the nations and regions of the UK. Reductions in commissioning therefore have consequences for regional growth as well as content creation.
- **Prioritising workforce sustainability.** Any response to these challenges must recognise that the UK's competitive advantage ultimately rests on its workforce. Reduced commissioning, budget pressures and growing insecurity are already affecting retention, skills development and workforce morale across the sector. Government should place greater emphasis on supporting good work, secure careers, training and skills retention, particularly among the freelance workforce, which remains fundamental to the success of the screen industries.
- **Protecting UK intellectual property and long-term value creation.** We share the Green Paper's concern that increasing reliance on platform funding can result in intellectual property and future revenues being retained outside the UK. Government should explore measures that support greater retention of IP value within the UK

production sector and ensure that inward investment complements, rather than displaces, sustainable domestic production.

- **Policy in this area cannot be considered in isolation from the Government's wider approach to AI and the creative industries.** Any strategy to support the future of UK media should be underpinned by strong protections for creative content, including transparency over AI training data, licensing and remuneration for rightsholders, and clear labelling of AI-generated outputs. Without these safeguards, there is a risk that value is transferred away from the creators, broadcasters and production companies that underpin the UK's world-leading creative economy.
- **Improving access to finance for independent producers and SMEs.** Smaller producers play a vital role within the UK's television ecology but often face significant barriers to investment and growth and are often the most vulnerable to commissioning reductions, finance constraints and shifts in market power. Targeted support for independent production would help strengthen the diversity and resilience of the sector.

More broadly, public service media should be understood not simply as content providers but as critical creative infrastructure. A strong and sustainable public service media sector supports jobs, skills, regional economies, independent producers and long-term growth across the wider creative ecosystem. Strengthening that foundation is likely to be the most effective way of addressing many of the challenges identified in this chapter.

Prominence of news on social media

Question 3. How often do you encounter news you feel is untrustworthy when online (for example, something you consider to be misinformation)?

Very often

Question 4. Do you believe 'trustworthy' news content should be more visible on social media? Options:

Yes

Question 5. If the government gives prominence to trustworthy providers of news (meaning by making them more visible online), should this prominence be ongoing, and 'always on,' or only active during periods of crisis?

Ongoing and 'always on'

Question 6. Do you feel individual users should be given an option in whether prominence measures for trustworthy news content are switched on or off for them?

No - users should not be given an option in whether prominence measures are switched on or off for them

Public service media providers play a vital role in providing accurate, impartial and trusted journalism, helping to support democratic participation, informed citizenship and social cohesion. In an online environment where engagement-driven algorithms can amplify misinformation, disinformation and sensationalist content, there is a strong public interest case for ensuring that trusted news providers are given meaningful prominence.

In practice, this should extend beyond simple availability of trusted news content and include genuine discoverability through recommendation systems, search functions and news-related content surfaces. Users seeking information on matters of public importance should be able to easily find trusted sources without having to compete on equal terms with unregulated or lower-quality content.

However, prominence must be delivered in a transparent and accountable manner. Platforms should be clear about how trusted news providers are identified, how prominence is applied, and

how relevant algorithms influence news discovery. Any approach should also support media plurality and avoid creating unnecessary barriers to entry for smaller trusted news providers.

Bectu believes trusted news prominence should operate on an ongoing basis rather than only during periods of crisis. The challenges posed by misinformation, declining trust and fragmented audiences are persistent features of the modern media environment, not issues that emerge only in exceptional circumstances. Prominence measures should therefore form part of a wider framework to support the long-term sustainability, discoverability and public value of trusted journalism.

Media literacy duty and joint venture

Question 7. How concerned, if at all, are you about the impact of misleading or unreliable information on society?

Very concerned

Question 8. How concerned, if at all, are you about the impact of misleading or unreliable information on democracy?

Very concerned

Question 9. Public service media refers to organisations such as the BBC, ITV, Channel 4 and S4C.

Which of the following statements most closely reflects your view on the role of public service media in helping people critically engage with news and other information they encounter online or offline? (select only one)

Public service media has a role in supporting critical engagement, and should do more

Question 10. How important, if at all, do you think it is for people to be able to judge the accuracy and reliability of information they encounter, for example online or in the news?

Very important

Question 11. How valuable, if at all, do you believe collaboration between public service media, civil society organisations (for example charities and education groups), and the media sector could be in supporting people to critically assess information?

Very valuable

Question 12. Which of the following models, if any, do you consider most effective for further media sector collaboration in this area?

- A structured forum with agreed objectives and reporting
- Joint delivery of public-facing initiatives

Question 12a. Please provide any supporting evidence as to why you think the model(s) you selected are effective for collaboration between public service media and the media sector.

Media literacy should not be treated as a substitute for effective regulation or sustained investment in trusted journalism and public service media. While supporting audiences to critically assess information is important, responsibility for tackling misinformation and improving access to trusted news should also sit with platforms and policymakers. Media literacy initiatives should therefore complement wider measures to support trusted journalism, transparency in algorithmic recommendation systems and the discoverability of public service content online.

Future of TV distribution

Question 13. Chapter 3.1 of the green paper outlines the government's preference for an IPTV transition from either 2034 or 2044. The following questions seek views and evidence relating to this proposal.

To what extent do you agree or disagree with the government's assessment of the case for change relating to the future of digital terrestrial television?

Agree - audiences should adopt IPTV and similar technologies

Question 13a. Please provide further rationale for your answer and any relevant evidence.

Audience viewing habits are increasingly moving towards IPTV and other internet-delivered services, and Government should plan for the long-term future of television distribution accordingly. We therefore recognise the case for a managed transition away from digital terrestrial television over time.

However, the timing and implementation of any transition will be critical. The objective should not be to accelerate migration for its own sake, but to ensure that audiences continue to enjoy universal access to trusted public service content and services throughout the transition.

In particular, any move towards IPTV must be accompanied by robust protections for universality, accessibility and prominence. Public service media content must remain easy to find and access regardless of distribution technology, and audiences should not face new barriers to accessing trusted news, information and UK-originated content.

Any transition must also be conscious of the wider economic and workforce implications of distribution change. Public service broadcasters are a key part of the UK's creative infrastructure, supporting commissioning, skills development, employment and production activity across the nations and regions. Decisions about future distribution models should therefore be assessed not only in terms of technology and audience behaviour, but also their impact on the sustainability of public service media and the wider production ecosystem.

Bectu believes that any transition should proceed only when government can demonstrate that:

- universal access to public service media can be maintained;
- digitally excluded audiences will not be left behind;
- strong prominence protections are in place for public service media services and content;
- network resilience and public information requirements have been adequately addressed;
- and
- the economic sustainability of public service media providers is protected.

The future of television distribution should be considered alongside the Government's wider approach to supporting UK-originated content, trusted news and the creative industries.

Question 14. The green paper outlines two timing options for digital terrestrial television (DTT) switch-off. These are 31 December 2034 (option 1 at Annex A) and 31 December 2044 (option 2 at Annex A).

Which option do you prefer as timing for DTT switch-off?

Somewhat prefer 2044

Question 14a. Please provide further rationale for your answer and any relevant evidence.

Decisions about future television distribution should consider not only technological readiness, but also the impact on accessibility, investment, commissioning, jobs and the wider creative economy.

A longer transition period would provide greater opportunity to ensure that the necessary conditions for a successful transition have been met. For that reason, 2044 is a preferable target.

In particular, additional time would help ensure that older audiences, disabled people, those on lower incomes and others at risk of digital exclusion are not left behind by the transition. Television remains an essential source of trusted news, information and entertainment for many people, particularly older audiences, and any move away from DTT must be accompanied by robust support, affordable access and accessible alternatives.

However, the priority should not be selecting a specific switch-off date, but ensuring that any transition is gradual, evidence-based and accompanied by appropriate safeguards for audiences, workers and public service media. The principle of universality should remain central throughout the transition, with no audience disadvantaged as a result of changes in distribution technology.

Question 15a. For industry/organisations only:

To deliver an IPTV transition would require collaborative working with audience groups, industry and across government. Please outline your organisation's commitment to supporting this work, including relevant experience, resources, and innovative solutions as to how you would deliver this transition.

As a trade union representing around 40,000 workers across broadcasting, television production and the wider creative industries, Bectu can bring the perspectives and expertise of the workforce that will be directly affected by changes to television distribution. Our members work across public service broadcasting, independent production, technology, operations, news, post-production and digital services, providing valuable insight into the practical implications of any transition.

Bectu has extensive experience engaging with government, regulators and industry bodies on major structural changes affecting the sector. We would welcome continued engagement to help ensure that the workforce implications of any transition are properly understood and addressed.

We believe successful delivery of an IPTV transition will depend on close collaboration between government, public service media providers, technology companies, audience groups, trade unions and civil society organisations. Particular attention should be paid to workforce impacts, skills requirements, accessibility, public service obligations and ensuring that no audiences are left behind.

As part of this process, Bectu could support efforts to:

- ensure workers and their representatives are involved in planning and implementation discussions;
- identify workforce and skills implications arising from distribution changes;
- support workforce training and adaptation where new skills are required;
- protect employment and job quality throughout the transition; and
- ensure that public service values, including universality, accessibility and prominence, remain central to future television distribution.

Question 16. To what extent do you agree or disagree that the challenges identified in the green paper (delivering for all audiences; maintaining a reliable television service; promoting competition and innovation in the television industry and supporting a sustainable future for PSM providers) capture all of the considerations when making a decision on whether, and how best, to support audiences to adopt IPTV and other similar technologies?

Disagree - the challenges do not capture all of the considerations

Question 16a. Please provide further rationale for your answer.

While we agree that all of the challenges identified are important, the Green Paper gives insufficient attention to the workforce implications of such a transition and the potential impact on the wider production ecosystem.

Public service broadcasters are not simply distribution providers. Nor are they isolated institutions. Their decisions on commissioning and investment have significant implications for the wider production ecosystem, including independent producers, freelancers and creative SMEs.

They are major commissioners of UK-originated content, significant investors in skills and training, and important employers across the nations and regions of the UK. Decisions about future television distribution therefore have implications not only for audiences and technology, but also for jobs, skills, workforce sustainability and the wider creative economy.

We also believe greater emphasis should be placed on maintaining the discoverability and prominence of public service media content in an increasingly platform-dominated environment. As audiences move from broadcast distribution to digital interfaces, search functions and algorithmically curated services, ensuring public service content remains easy to find will become increasingly important.

In addition, the Government should consider how any IPTV transition aligns with wider policy objectives relating to trusted news, media literacy, public service content and emerging technologies. As audiences increasingly consume content through digital platforms, issues such as algorithmic transparency and the challenges of AI-generated content will become increasingly relevant to the future media landscape.

Question 17. In your opinion, which, if any, of the challenges are most important to you? Please rank in order of importance, where 1 is the most important to you.

1. Supporting a sustainable future for public service media providers - public service media providers play a central role in the UK's cultural, civic, and democratic life. Industry must ensure that new distribution models support, rather than undermine, public service media providers' ability to play this role.
2. Delivering for all audiences - Any transition to IPTV and other similar technologies must preserve universal access to TV, including public service media providers, regardless of income, location, age, or digital confidence.
3. Maintaining a reliable television service - The ability to communicate to the public in a national emergency must be retained beyond a move to IPTV. Before digital terrestrial television is switched off, industry must show that alternative technologies can deliver comparable or better standards of reliability, resilience, and coverage.
4. Promoting competition and innovation in the TV industry - A managed transition to IPTV and other similar technologies offers an opportunity to modernise TV delivery, the transition should free up resources and spectrum and allow broadcasters to focus on content and innovation rather than maintaining parallel legacy systems.

Question 20. Is there anything else you would like to add regarding the future of TV distribution that has not already been captured?

Decisions about distribution have significant implications for the sustainability of public service media, the wider production ecosystem and the workforce that underpins the UK's television sector.

We are particularly concerned that a transition to IPTV could increase the influence of digital gatekeepers over content discovery unless robust prominence protections are in place. Public service media content should remain easy to find and access regardless of distribution technology, and public policy should not rely solely on commercial agreements between platforms and media providers to secure these outcomes.

We would also encourage Government to give greater consideration to the workforce impacts of distribution change. Public service broadcasters play a vital role as commissioners, skills incubators and regional economic anchors. Changes to the distribution framework should

therefore be assessed not only against audience and technical criteria, but also against their impact on commissioning, employment, skills development and workforce sustainability.

Finally, policy on the future of television distribution should align with the Government's wider objectives for supporting the creative industries and protecting creative value. This includes ensuring appropriate transparency and accountability in the use of AI technologies, including transparency around training data and clear labelling of AI-generated content.

Future of TV regulation

Question 21. Chapter 3.2 of the green paper sets out some of the challenges regarding the future of TV regulation, such as which TV-like services should be regulated going forward, and to what standard. Is there any information or comment you would like to provide in relation to the future of TV regulation?

The regulatory framework for television must evolve to reflect changing audience behaviour and the growing importance of on-demand and platform-based services. The future regulatory framework should also account for the growing role of AI-generated content and algorithmic systems in shaping audience access to information and content.

Future regulation should focus less on how content is delivered and more on the nature of the service being provided. As audiences increasingly consume television content online, there is a risk that services delivering similar content to similar audiences are subject to very different regulatory expectations.

Increasingly, platform interfaces, recommendation systems and algorithms act as gatekeepers of audience attention. Future regulation should ensure that these systems do not undermine media plurality, the discoverability of public service content or the commercial sustainability of UK content production.

Any future framework should continue to support key public interest objectives, including trusted news, high-quality UK-originated content, accessibility, audience protection and media plurality. Reforms should not weaken public service obligations or create regulatory imbalances that disadvantage public service media providers relative to competing commercial platforms.

Government should also consider whether existing media plurality and ownership frameworks remain fit for purpose in an environment where audience access and content discovery are increasingly influenced by global platforms and cross-media business models.

We would also encourage Government to consider the wider impact of regulatory reform on the production ecosystem and workforce. Public service media supports jobs, skills, training and investment across the UK, and regulation should continue to reinforce these positive outcomes

Prominence of PSM content in the platform age

Question 23. Prominence can be defined as giving certain content a privileged position, for example, ensuring a specific channel appears at the top of search results or features on a recommendation feed, within a user interface so it is particularly easy for audiences to find and watch.

To what extent do you agree or disagree that content from public service media providers (like the BBC and Channel 4) should be easier to find on video platforms?

Strongly agree - it should definitely be easier to find Public Service Media content on these platforms

Question 23a. What do you see as the benefits of content from public service media providers (like the BBC and Channel 4) being easier to find on video platforms?

Making public service media content easier to find on video platforms would help ensure that audiences continue to benefit from trusted news, educational content, culturally relevant UK programming and distinctive UK storytelling in an increasingly fragmented media environment.

Greater discoverability would also support the long-term sustainability of public service media providers themselves. Audience reach remains fundamental to the value of public service content and to the organisations that commission and invest in it. If audiences increasingly consume content through platform-based environments, public service media content must remain visible and accessible within those environments.

Greater discoverability is not simply an audience benefit. Audience reach underpins the value of public service content and, in turn, supports future commissioning, investment in original UK productions, skills development and employment across the creative industries.

The benefits extend beyond broadcasters. Public service media providers are major commissioners of original UK content and support a much wider creative ecosystem. Systemic sustainability must encompass not only broadcasters themselves but the wider network of independent producers, freelancers, facilities providers, post-production companies, skills bodies and creative SMEs that depend upon commissioning activity. Ensuring public service content remains discoverable helps sustain investment in new productions, skills development, regional production and creative employment across the UK.

Greater prominence would therefore deliver cultural, democratic and economic benefits. It would help maintain access to trusted information, support media plurality and ensure that UK audiences continue to encounter a broad range of high-quality UK-originated content, while supporting the wider creative economy on which that content depends.

Question 23b. What types of content from public service media providers do you think should be easier to find on video platforms? (select all that apply)

- Arts and classical music
- Children's
- Comedy
- Drama
- Education
- Entertainment
- Factual entertainment
- Feature films
- General factual
- News and current affairs
- Religion and ethics
- Soaps
- Specialist factual
- Sports
- Other (please specify)

Prominence should support the wider public service offer as a whole rather than creating a hierarchy between genres

Question 23c. On which video platforms do you think content from public service media providers should be easier to find?

Public service media content should be easily discoverable across all major video platforms used by UK audiences, including streaming services, video-sharing platforms, connected TV interfaces, app stores, search functions and content recommendation systems.

As viewing increasingly shifts from linear broadcasting to on-demand and platform-based consumption, prominence protections should follow audiences rather than being tied to a specific technology or platform.

A new system of public service media for television

Question 25. Which of the following, if any, attributes of public service media content do you value the most? Please select (up to) your top three.

- Tailored to UK audiences - programmes that are specifically made for UK audiences, and are relevant to me
- Quality news - news content that is accurate, and helps me better understand what is going on in the world today
- Quality content (non-news) - programmes or content that you see as high-quality and or different in their approach to what is offered by other providers

Question 26. Chapter 4.2 of the green paper outlines the challenges public service media faces and how the system tied to broadcast licences is relatively inflexible. The chapter suggests this limits the options for benefits and obligations Ofcom can place on public service media providers, and makes it harder to open up the system to new providers. It is argued this risks the sustainability of the system as audiences move away from live broadcast TV to switch between linear, on-demand, and user-generated content on multiple devices.

Disagree - I do not agree that the system necessarily needs to be reformed away from using broadcast licences

Question 26a. Please provide a reason and any supporting evidence for your view.

Before replacing this model, Government should clearly demonstrate how any alternative framework would maintain these public service outcomes: supporting trusted news, UK-originated content, regional production, skills development and investment across the wider creative economy.

Any future framework should also support the wider ecosystem that public service media sustains. Systemic sustainability must encompass not only broadcasters themselves but the wider network of independent producers, freelancers, facilities providers, post-production companies, skills bodies and creative SMEs that depend upon commissioning activity.

Government should avoid creating a system in which public service media providers continue to carry extensive social and cultural obligations while the platforms increasingly controlling discovery and audience access face comparatively limited public service responsibilities.

We are concerned that reforms focused primarily on introducing new providers into the system could unintentionally weaken the existing public service broadcasting compact. Public service obligations have historically been balanced by meaningful benefits, including prominence, access to spectrum and regulatory support. Any new approach must ensure that obligations and benefits remain aligned and that existing providers are not placed at a competitive disadvantage.

Reform should strengthen, rather than dilute, public service obligations and should not undermine the sustainability of the institutions that currently deliver the vast majority of public service content.

Question 27. The green paper outlines four potential principles of the public service media system.

In brief, these are:

- **Universality: to ensure that public service content remains universally available, free of charge, reflecting audience behaviours and media consumption habits.**

- **Public service content:** to ensure provision of a wide range of high-quality, distinctive public service content.
- **Systemic sustainability:** to ensure the system of public service media has a mix of providers to increase its resilience to deliver public service media objectives in the long-term. It should also be sufficiently flexible to the potential shifts of the current collection of PSM providers and be open to opportunities of mergers, partnerships, and definitions of public service content.
- **A sustainable PSM compact:** to ensure the benefits PSM providers receive are proportionate to the obligations they must deliver for PSM status so as to be attractive and commercially sustainable.

To what extent do you agree or disagree that each of the following should be considered by government as principles of the public service media system?

- Universality
 - Strongly Agree
- Public service media content
 - Strongly Agree
- Systemic sustainability
 - Strongly Agree
- A sustainable public service media compact
 - Strongly Agree

Question 28. The green paper outlines three illustrative models for our public service media system to align with our proposed principles. These models are outlined below, and a more detailed description on each is presented in chapter 4 of the green paper. Please rank, in order, your preferred model of the public service media system, where 1 is your most preferred model:

- **A model focused on PSM institutions** would see institutions, such as broadcasters or streamers, designated as PSM institutions.
 - **A model focused on PSM services** would allow specific ‘services’ to receive PSM designation if they were to meet agreed requirements. In this context, ‘services’ could range from linear provision, such as an arts-focused TV channel, a high-quality VoD service, or channels on video sharing platforms, such as a history or documentary channel on YouTube.
 - **A content-centric approach** would determine whether something is public service content subject to an agreed definition (which could evolve in line with cultural/societal needs) rather than a particular provider (institution or service).
1. A model focused on PSM institutions
 2. A combination of the models
 3. A model focused on PSM services
 4. A content centric approach

Question 29. Do you have any further comments you would like to add on the content covered by this chapter, or any further information that will aid us in interpreting your responses?

We recognise that reform may be required to reflect changing audience behaviour and the growth of digital and on-demand services. However, any future model should build on the strengths of existing public service institutions rather than dilute them.

Public service broadcasters and media organisations provide a wider public value than the sum of their individual programmes. They act as commissioners, investors, employers, skills incubators

and cultural institutions. This institutional role is particularly important in supporting trusted news, media plurality and the wider creative economy. This wider public value extends beyond broadcasters themselves to the independent production sector, freelancers, creative SMEs, facilities companies and skills providers that rely on a healthy commissioning ecology.

We would urge the Government to avoid models that focus primarily on individual services or content. While such approaches may provide greater flexibility, they risk fragmenting the public service media system and weakening the link between public service obligations and the wider ecosystem that supports their delivery. A content-centric model in particular risks overlooking the institutional investment, workforce, infrastructure and public service commitments required to create that content in the first place.

Reform should strengthen the public service broadcasting compact, ensuring that obligations remain matched by meaningful benefits and that trusted news, UK-originated content, skills development and regional production continue to be supported at scale.

Equalities impact

Question 30. There is a duty on public authorities to consider how their policies or decisions affect people with protected characteristics under the Equality Act 2010.

Do you have any evidence of the equalities impacts of any proposals set out in the consultation?

Any transition towards IPTV and online delivery models may have disproportionate impacts on older people, disabled people, people on lower incomes, and those living in areas with poorer broadband connectivity. Maintaining universality and accessibility must therefore remain a central consideration in future television distribution and public service media policy.

From a workforce perspective, the challenges identified throughout this consultation have potential equalities implications. Insecure employment, freelance working patterns, long working hours and limited career progression can disproportionately affect workers with protected characteristics, including disabled workers, women, those with caring responsibilities and workers from underrepresented backgrounds.

The sustainability of public service media is therefore not only a cultural and economic issue, but also an equality issue. Any further reductions in commissioning, increased labour market insecurity, and changes to production and distribution models could exacerbate existing inequalities if appropriate safeguards are not put in place.