

NUJ response to UK media green paper consultation

August 2026

About the NUJ

The National Union of Journalists (NUJ) is the voice for journalism and journalists in the UK and Ireland. It was founded in 1907 and has 21,000 members working in broadcasting, newspapers, news agencies, magazines, book publishing, public relations, photography, videography and digital media.

The NUJ is affiliated to the Trades Union Congress (TUC) and is not affiliated to any political party.

Consultation questions

Please tell us in what capacity you are responding:

- As a member of the public
- As an academic researching media or creative industries, or other relevant fields
- As an individual who works in the media or creative industries
- ☒ On behalf of an organisation

What is the name of the organisation? The question differs depending on previous answer.

National Union of Journalists (NUJ)

Do you consent to waive your organisation's right to anonymity so your organisation is identifiable in any published materials

- ☒ Yes
- No

Which sections of this consultation would you like to answer questions about? Please select all that apply.

- ☒ Section 1: Market and audience context

- ✓ *Section 2: Prominence of news on social media*
- ✓ *Section 3: Media literacy duty and joint venture*
- ✓ *Section 4: Future of TV distribution*
- ✓ *Section 5: Future of TV regulation*
- ✓ *Section 6: Prominence of public service media in the platform age*
- ✓ *Section 7: A new system of public service media*
- ✓ *Section 8: Equality impact*

Introductory question

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?

The current market and audience context

Audiences are moving online rapidly, causing a dramatic shift from traditional broadcasting and print news to digital tech platforms. Digital platforms are playing an increasing role in news consumption in the UK and are used by 82% of people aged 16+, compared to 76% who watch broadcast television news. This creates a major sustainability challenge where audiences are increasingly consuming journalism through platforms whose business models do not compensate or fund the original journalism they publish.

At the same time, cuts to newsrooms and closures of print titles are creating news deserts at a local and regional level. The rapid spread of misinformation and disinformation, including AI-generated content and the algorithmic fueling of hatred and prejudice, places further pressure on the news and media industry to rebuild public trust.

Prominence of news and public service media

Public service broadcasting is essential now more than ever due to audiences' reliance on unregulated social media and distorting algorithms for their news and information. A 2026 report by the Reuters Institute for the Study of Journalism found that 62% of people are concerned about online misinformation. While some bona fide newsgatherers do publish journalistic work on social media, the rapid rise of AI-generated fake news and deepfakes on these platforms is no doubt contributing to that distrust. By comparison, public service media organisations are bound by journalistic standards, including around accuracy and independence - with accountability measures in place for when those standards are not met. Trusted news must therefore remain prominent and easy to access on TVs, search engines and social media platforms. A functioning democracy relies on voters having access to accurate, dedicated and trustworthy journalism. See our responses to questions 4 and 4a for further details.

Future of TV distribution and regulation

The NUJ has published a [News Recovery Plan](#) that sets out a series of proposals to strengthen and revitalise the UK's media industry. This includes calls for greater protection and investment in public service broadcasting and local news, with recent cuts and proposed takeovers of news outlets demonstrating the risk of watered-down public service media. In June, the NUJ condemned Ofcom's decision to allow STV to cut its dedicated news coverage for the North of Scotland despite widespread opposition and strike action by members. Ofcom must preserve and enforce public service media's local news obligations as well as their minority language output. The proposed Comcast takeover of ITV and Sky would significantly increase concentration within the UK broadcasting sector, as well as posing risks to the broadcaster as a merger that delivers cuts without a cash injection for local news would be a devastating blow to journalism. The regulators must act in the public interest and prevent a race to the bottom in which more public service broadcasters begin looking at reducing their commitments.

Media literacy

Most people consume their news online and from social media platforms where a significant portion of the content is rooted in harmful, racist, and/or abusive narratives. Additionally, the widespread circulation of mis- and disinformation from unverified reporting and AI-generated content makes it increasingly more difficult to distinguish the truth from fake news. Therefore, the NUJ supports a nationwide media literacy initiative led by public service broadcasters. Any such obligation must come with additional, demarcated government funding. The rollout of a national media literacy initiative should be accompanied by stronger regulation that clamps down on tech companies that facilitate and platform harmful and misleading content.

The NUJ has called for the establishment of a Journalism Foundation, set up by a government grant, to invest and innovate public interest journalistic projects, to encourage new funding models and start-ups, encourage philanthropic donations and promote diversity and media literacy. In July, the NUJ welcomed the establishment of a Local News Fund and other measures in the Local Media Strategy.

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*
- *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?

The NUJ's [News Recovery Plan](#) sets out a series of proposals to strengthen and revitalise the UK's media industry.

The government must invest in public service broadcasting, acknowledging its role in creating diverse original content - including factual, investigative, and cultural content that reflects and serves different communities across the UK but otherwise would not be considered commercially viable - that has an unrivalled economic and cultural value. The BBC alone contributed £6.7bn to the UK economy and supported 79,000 jobs in 24/25.

The question notes significant financial pressures across the media industry. This is felt acutely in journalism given the rise of the tech giants that have hoovered up the lion's share of digital advertising revenue and harvested editorial content for years without contributing to its production. The union proposes a 6% windfall tax on tech giants as well as an ongoing digital tax to provide sustainable funding that protects jobs, conditions, and access to quality news.

We need a plural and thriving public service broadcasting ecosystem, with varying remits and models, to serve the different national and community interests of viewers and support the wider creative industry.

The government must seize the opportunity that Charter Renewal brings by establishing secure and sustainable funding for the BBC, ending salami slicing cuts that are compromising quality and diminishing breadth of content. This model must also enshrine universality, protect against political interference, and provide real representation, including on the BBC board. However, it's clear that any such changes won't come in time to address the crisis the BBC is currently facing. In June, the BBC initiated the first wave of its brutal cost-cutting strategy, announcing hundreds of layoffs and the closure of much-loved programmes in TV and radio. The NUJ urges the government to provide urgent intervention to stave off these cuts, which will no doubt cause long-term damage. The government can alleviate financial pressure on the BBC by providing direct funding for free licences for eligible over 75s and re-establishing full funding for the World Service, which is among the UK's greatest global assets.

The NUJ recently responded to the Competition and Markets Authority (CMA) inquiry into the acquisition of ITV by Sky, highlighting our members' concerns that the merger would significantly increase concentration within the UK broadcasting sector. The response also highlights the need for the new owners to maintain ITV's existing public service broadcast offering, including vital regional news coverage. Although assurances have been given publicly regarding the continuation of these commitments, mergers on this scale typically create commercial incentives that weaken investment, including in regional news. This is a part of the sector where competition is already lacking following years of decline. The regulators also have an important role to play in retaining plurality in our media landscape and therefore promoting competition and diversity of content.

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)?*

Options:

- *Never*
- *Rarely*
- *Sometimes*
- *Often*
- ☒ *Very often*
- *Not sure*

Disinformation is the deliberate creation and spreading of false and/or manipulated content. Misinformation is the unintentional creation and spreading of such information. In a survey by Ofcom in 2024, four in ten UK adults said they had encountered misinformation or deepfake content in the prior month, with 71% claiming they had seen it online. Four in 10 (43%) said they had seen misinformation on TV, and one in five (21%) via print newspapers or their associated websites/apps. It's clear that online misinformation, driven largely on social media, is a growing problem that needs to be addressed.

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

- ☒ *Yes*
- *No*
- *Not sure*

Yes, people have a right to access information and the government has a duty to uphold this right, including by ensuring that people have the ability to access information that is accurate and that derives from a diversity of sources. However the key question that the green paper raises - and that the government must grapple with - is what constitutes and who defines 'trustworthy news'. The state must not be the arbiter of what is and what isn't 'trustworthy' as this would be a clear conflict of interest that could allow any government to shut down criticism and scrutiny, thus constituting a severe infringement on press freedom and media plurality.

The union advocates for the definition of ‘trustworthy’ news to be expanded so as not to exclude local news outlets and independent media organisations alongside individual freelance journalists who adhere to established journalistic standards e.g. the NUJ’s Code of Conduct. The union outlines different possible approaches to defining ‘trustworthy’ news in our response to question 4a.

The spread of misinformation poses substantial risks to both individuals and wider society. It can polarise communities, undermines democratic processes, and incites dangerous behaviours. For example, online misinformation around the identity of the Southport attacker in July 2024 triggered far right riots nationwide, instigating attacks on ethnic minorities, places of worship, and buildings housing asylum seekers and refugees.

Social media algorithms use complex AI-driven models to rank content based on factors such as engagement (likes, shares, and comments), topic relevance, and users’ past interactions to personalise feeds and maximise time spent on the platform. Prioritising stimulating, emotive and extreme content makes it more likely for sensationalised news as well as mis- and disinformation to be amplified.

A [report](#) by the Science, Innovation and Technology Committee found that within hours of the 2024 Southport attack, false information around the identity of the killer began spreading on social media. On X, a post stating that the suspect was “a Muslim immigrant” received 3.8 million impressions in a day, and not long after, a false name featured as a trending topic in the UK. That name also showed up in TikTok search recommendations, while posts calling for violence against migrants spread on Facebook.

Misinformation can also lead to a breakdown in trust and confidence in all news sources. At the NUJ’s most recent conference, members recognised that many people accuse journalists of being biased and unreliable, “creating a climate where misinformation, propaganda and conspiracy theories are seen as equally valid with well-researched and ethical journalism.” They reaffirmed that a functioning democracy needs accurate, dedicated journalism that is trusted by its citizens. Giving more algorithmic prominence to reliable and trustworthy journalism on social media is, on its face, a sensible step towards improving access to accurate information.

At the same time, if these proposals are to be implemented, they must be done in a way that avoids adverse effects, such as the systemic silencing (or deranking) of freelances and independent media voices who provide audiences with well-researched, quality information, and hold power to account.

The principle of media plurality also requires the preservation of diverse perspectives and alternative coverage. Challenging and contrary voices are a necessary part of the media landscape and cannot be collateral damage in efforts, however well-intentioned, to combat misinformation. Again, the NUJ unambiguously affirms that the exercise of editorial judgement is not the function of government.

Question 4a. *How would you like this to look in practice, so that audiences can access trustworthy news more easily on social media?*

Existing measures used by social media companies to address the spread of misinformation have clearly not been effective. X uses a Community Notes system that gives users the option to propose contextual additions or fact-checks under the original post. However, these notes only appear once enough people from diverse ideological perspectives rate it as “helpful”, meaning in many cases, they don’t appear, and in some instances, they themselves contain misinformation. Recently, Meta abandoned the use of independent fact checkers on Facebook and Instagram, and replaced them with X-style Community Notes.

Tackling the proliferation of misinformation on social media platforms must start with changes to tech giants' algorithms. Accurate information from trusted and reputable sources, including journalists and journalistic outlets, should be more prominent in feeds than information on the same topic from other contributors.

If these proposals are to go ahead, social media companies will need a definition for “trustworthy news”, and it shouldn’t be left to the tech giants or the state to decide how that is determined. A clear, transparent, and consistently applied category of “trustworthy news” or “trusted news providers” would need to be created. There are numerous possible approaches:

- **Public service media in the UK could be given automatic “trusted” status.** While this is perhaps the simplest method, it’s also potentially exclusionary if it results in the silencing or deranking of freelancers and independent media voices who themselves provide audiences with well-researched, quality information, and hold power to account. This would also possibly mean people have reduced access to a diverse range of media and could potentially put individual journalists and independent publishers who make money on social media out of business. A better option within this approach could be to have a quota of public service media sources

near the top of news feeds while still preserving access to a plurality of sources and voices.

- **Building on the recognised news publisher definition in the Online Safety Act 2023** is an option, as suggested in the consultation foreword. This includes both broadcasters and UK-based entities whose primary purpose is publishing news-related material, created by different persons, subject to editorial control, a standards code, and with a mechanism for resolving complaints. Again, this would be a restrictive definition that risks excluding a large number of independent journalists.
- **An independent regulatory accreditation system could be introduced.** Individuals and outlets could apply to be put on the “trusted” register by guaranteeing their adherence to editorial codes and widely accepted journalistic standards. The NUJ believes that an independent regulatory system must have the trust of the public and media practitioners. A new regulatory system could be based on the model of the Press Council of Ireland (PCI), which has an independent chair, civic society representatives, industry representatives and the NUJ. The chair and public interest reps are appointed following expressions of interest by a high-level appointment committee. There is no state role in the appointment process or in the day-to-day running of the PCI. It has been described as co-regulation because the existence of the PCI is recognised in legislation, giving it statutory underpinning and legal protection but autonomy and freedom from government interference. The Irish model is widely regarded. Significantly, UK publishers were involved in establishing the PCI and are represented on the Council and its subsidiary bodies. This includes News International, the Daily Mail General Trust (publishers of the Mail and Mail on Sunday), Reach Plc and Iconic Newspapers. The understandable reservations of publishers, editors and journalists in the UK about a new regulatory body may be assuaged by adoption of a model already endorsed in Ireland and with widespread support from the public and journalists working in Ireland.
- **Working with organisations already responsible for accrediting journalists, for example, gatekeepers of the UK Press Card** could make it possible to avoid needlessly restricting the definition of “trusted news” while also avoiding duplication of work.

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?*

Options:

- ☒ *Ongoing and ‘always on’*
- *Only during periods of heightened vulnerability*
- *Not sure*

Mis- and disinformation is rife on social media, and the issue is only getting worse, particularly with the rise of AI-generated fake news and deepfakes. The problem is certainly intensified during periods of national crisis, but an ongoing and ‘always on’ approach could reap significant benefits for society and individuals in the longer-term. It is worth noting that the NUJ Code of Conduct, which outlines the key principles for ethical journalism, has endured for 90 years. There is always a need for ethical journalism. While this proposal has merit, it will not on its own address fundamental issues - such as around concentration of media ownership and threats to media plurality – regardless of whether prominence is ‘always on’ or only active during periods of crisis. The union could only support this proposal so long as media plurality is upheld and the free speech of freelancers and independent publishers is protected.

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?*

Options:

- *Yes - users should be given an option in whether prominence measures 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*
- *Not sure*

People on social media do not choose to see posts with mis- and disinformation on their feeds, rather it’s largely a consequence of what tech companies’ algorithms choose to promote. In that sense, an opt-out of the proposed prominence measures would offer very little choice back to users (provided they can still easily access content from the accounts

they follow or subscribe to). Also, individual choice in this respect should be balanced against the wider social aims of creating a healthier information environment, protecting democracy, and improving social cohesion. Algorithms controlled by a small number of extremely powerful and unaccountable multinational corporations fundamentally undermine media plurality. The objective of algorithms is to direct consumers towards pre-determined choices based on data analysis of past patterns of behaviour. This re-enforces rather than challenges existing opinions - and prejudices - and invites consumers to remain in a technologically devised echo chamber.

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?*

Options:

- ☒ *Very concerned*
- ☐ *Somewhat concerned*
- ☐ *Not very concerned*
- ☐ *Not at all concerned*
- ☐ *Not sure*

The NUJ is very concerned about the impact of misleading and unreliable information on society, particularly because of its role in fuelling discrimination. For example, the mobilisation of the 2024 Southport riots demonstrated how misinformation and disinformation can be used to rapidly organise and sustain violent protests. Social media platforms such as X and Facebook enable misleading information about minority groups to spread at scale, while some amplify far right content, making it more visible and easier to mobilise users online.

The Covid-19 pandemic further demonstrated the societal impact of misinformation as it significantly impacted mental health, vaccine hesitancy, and decision-making. The World Health Organisation referred to this as an 'infodemic' where the rapid spread of misinformation occurs during an epidemic, leading to mistrust in health authorities and widespread confusion.

The NUJ is also concerned about the impact of generative AI in reinforcing discriminatory beliefs and practices while making it increasingly difficult for the public to distinguish between authentic and AI-generated content. The union has called for AI-generated content to be clearly labelled to avoid eroding public trust in journalism.

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

Options:

- ☒ *Very concerned*
- *Somewhat concerned*
- *Not very concerned*
- *Not at all concerned*
- *Not sure*

A healthy democracy depends on access to accurate, trusted information and a free, independent press that enables the public to make informed decisions and hold those in power accountable. Without accurate and trusted information, the UK cannot have a functioning or informed democratic society.

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)

Options:

- *Public service media has a role in supporting critical engagement, and is currently doing enough*
- ☒ *Public service media has a role in supporting critical engagement, and should do more*
- *Public service media does not have a role in supporting critical engagement*
- *Public service media is currently doing too much to support critical engagement, and should do less*

- *Not sure*

The NUJ believes that public service media has an important role in supporting media literacy. The NUJ has called for a nationwide media literacy initiative led by public service broadcasters. However, any obligations placed on public service broadcasters must be accompanied by dedicated, demarcated government funding to ensure they can deliver this role effectively.

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?*

Options:

- ☒ *Very important*
- *Somewhat important*
- *Not very important*
- *Not at all important*
- *Not sure*

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?*

Options:

- ☒ *Very valuable*
- *Somewhat valuable*
- *Not very valuable*
- *Not at all valuable*
- *Not sure*

The model of civic participation used in the Press Council of Ireland is useful. Any consultative structures must be genuinely inclusive.

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

Options: (select all that apply)

- ☒ *Informal coordination and sharing of learning*
- ☒ *A structured forum with agreed objectives and reporting*
- ☒ *Joint delivery of public-facing initiatives*
- *No additional collaboration is needed*
- *Not sure*

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.*

The NUJ supports a nationwide media literacy initiative led by public service broadcasters, including the BBC, as part of efforts to tackle mis and disinformation and deep fakes - but any obligation must come with additional, demarcated government funding. Public service broadcasting is based on the concept of journalism as a public good.

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?

- *Strongly agree - audiences should definitely adopt Internet Protocol Television (IPTV) and similar technologies*
- *Agree - audiences should adopt IPTV and similar technologies*
- *Neither agree nor disagree - no strong opinion either way*
- *Disagree - audiences should not adopt IPTV and similar technologies*
- ☒ *Strongly disagree - audiences should definitely not adopt IPTV and similar technologies*
- *Not sure*

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

According to estimates, nearly four million UK households still rely exclusively on terrestrial TV. Many of these are older adults, low-income families, or those in rural areas with subpar

broadband infrastructure. Of the households who rely solely on DTT without broadband, 93% of viewers were aged 55 or over, and 42% had a disability. The end of terrestrial TV would exclude these demographics and would be a complete loss of access for marginalised communities. For example, IPTV can be accessed by a significant number of different third-party apps and platforms, which means standard accessibility protocols can often break down - i.e. one app might support screen reads or custom subtitle size while another may ignore them entirely. Additionally, streaming remotes can be more challenging to use for individuals with motor disabilities.

Digital exclusion is not just an issue for those aged 55 or over but for future generations as constantly changing digital interfaces risk alienating people over time. Members of the NUJ's 60+ Council have been among those driving the campaign, launched seven years ago by the National Pensioners Convention (NPC), to tackle digital exclusion. The union's Council also supports and regularly reports on the work of the Digital Poverty Alliance. The Council's work with these organisations and the experiences of NUJ members show that many older and disabled people - as well as some living in rural areas with poor connectivity - will not be able to access or afford broadband. Freeview is and will remain essential for people who are digitally excluded.

The government should also be mindful of digital poverty beyond the UK. Many media organisations report - and are accessed by audiences - across the world. An IPTV transition risks deepening digital exclusion globally, particularly in countries with infrastructure gaps and lack of internet access.

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?

Options:

- *Strongly prefer 2034*
- *Somewhat prefer 2034*
- *No strong opinion either way*
- *Somewhat prefer 2044*
- *Strongly prefer 2044*

- ✓ *Neither 2034 or 2044*
- *Not sure*

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

The NUJ strongly supports maintaining universal access to public service broadcasting.

Freeview (also known as Digital Terrestrial Television, or DTT) is currently available to 99% of the population. We note that 67% of people still watch live TV via a TV set, so careful consideration must be given to those who do not have a secure or fast digital connection at home.

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

Question 15. *Do you have evidence that another timeframe is preferable to the ones specified in this consultation? If so, please provide further details.*

The reduction or removal of DTT should only be considered once free-to-air services can be universally received for free.

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.

N/A

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?*

- *Strongly agree - the challenges comprehensively capture all of the considerations when making a decision on whether, and how best, to support audiences to adopt IPTV and other similar technologies*
- *Agree - the challenges capture all of the considerations*
- *Neither agree nor disagree - no strong opinion either way*
- ☒ *Disagree - the challenges do not capture all of the considerations*
- *Strongly disagree - the challenges definitely do not capture all of the considerations*
- *Not sure*

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

Please see answer to question 13a.

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.*

Options:

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 18. *In the event of an IPTV transition, which of the following, if any, do you think are the most important to ensure everyone can still access television from their own home? Please rank in order of importance, where 1 is the most important to you.*

Options:

- *Affordable broadband for all, suitable for television viewing*
- *Low-cost or subsidised broadband for people receiving benefits or on low incomes*
- *Low-cost or discounted internet capable television sets for people on low incomes*
- *Simple devices that connect older television sets to the internet with no ongoing fees*
- *Services and systems that feel the same as digital terrestrial television so they are easy to use for people with limited digital skills*
- *Built-in, easy to use accessibility features for disabled users, for example subtitles and audio description*
- *Digital skills required to navigate or set up IPTV*

We have not answered this question as the premise falsely suggests that these options are competing and can't all be implemented.

Question 19. *What are the likely environmental impacts associated with both a 2034 transition and 2044 DTT switch-off (transition to IPTV)?*

In your response, please provide evidence where possible on:

- *The comparative energy use and carbon emissions of different distribution technologies.*
- *The environmental implications of changes in viewing behaviour (for example, increased streaming or on-demand consumption)*
- *The lifecycle environmental impacts of relevant infrastructure and consumer equipment (such as transmitters, network infrastructure, set-top boxes, and connected televisions)*
- *Opportunities to improve the environmental sustainability of television distribution, including through technological innovation, infrastructure efficiency, or consumer behaviour*

- *Any risks that policy decisions on the future of TV distribution could unintentionally increase environmental impacts*

Please include any available data, modelling, or research that could inform the government's assessment of environmental impacts.

Other organisations would be better placed to answer this question.

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

N/A.

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 Union supports a recommendation from the Cairncross Review for a News Quality Obligation. We believe that Ofcom's Broadcasting Code principles should apply to online content - including Video on Demand Services - and Ofcom should be empowered to regulate online news content produced by UK public service broadcasters in the same way it regulates broadcast content.

Prominence of PSM content in the platform age

Question 22. *How easy or difficult is it for you to find culturally relevant content on video platforms, including video sharing platforms like YouTube and TikTok and streaming platforms like Netflix and Amazon Prime Video?*

Examples of culturally relevant content could include stories set in Britain, with British presenters, representing British values or referencing British events or customs.

Options:

- *Very easy - I have no issues in finding culturally relevant content on these platforms*
- *Somewhat easy - I have very few issues in finding culturally relevant content on these platforms*
- ☒ *Neither easy nor difficult - no opinion either way*
- *Somewhat difficult - I have some issues in finding culturally relevant content on these platforms*
- *Very difficult - I have a lot of issues in finding culturally relevant content on these platforms*
- *Not sure*

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?

Options:

- *Strongly agree - it should definitely be easier to find Public Service Media content on these platforms*
- ☒ *Agree - it should probably be easier to find public service media content on these platforms*
- *Neither agree nor disagree - no opinion either way*
- *Disagree - it should probably not be easier to find public service media content on these platforms*
- *Strongly disagree - it should definitely not be easier to find public service media content on these platforms*
- *Not sure*

While we agree that prominence ought to be given to all “trusted” media, the NUJ strongly believes that this definition shouldn’t just include public service broadcasters, and the nuances addressed in the answers to question 4 and 4a must be reflected in any reforms to avoid adverse implications.

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?*

See responses above (question 4 and 4a).

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)*

Options:

- ✓ *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*
- *None of the above*
- *Other (please specify)*

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

All major social media and video streaming platforms available in the UK. See answers to q4 and 4a for the union's position on which content should be made easier to find.

Question 24. *Do you regularly create video content and upload it to video sharing platforms, such as YouTube and TikTok?*

Options:

- Yes, primarily for fun or as a hobby
- Yes, primarily for professional purposes or to generate income
- No
- ☒ Prefer not to say

Question 24a. *As a content creator or someone who uploads content to video sharing platforms, are there additional changes or features that you would want video sharing platforms to offer? For example to increase the visibility of your content, transparency of systems or to make content more discoverable.*

N/A.

Question 24b. *Thinking about the video sharing platforms you upload and share content on, do you have sufficient awareness of how content is shown to viewers through the algorithms?*

Options:

- I have sufficient awareness of how the algorithm works
- ☒ I do not have sufficient awareness of how the algorithm works
- Not sure

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.*

Options:

- ☒ Diverse programming - content that features people like me, and people from different backgrounds
- ☒ Quality news - news content that is accurate, and helps me better understand what is going on in the world today
- ☒ Regional coverage - programming or content that keeps me informed about my area
- 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

- *Range - the availability of a range of different types of programmes (for example drama, comedy, entertainment, sport)*
- *Tailored to UK audiences - programmes that are specifically made for UK audiences, and are relevant to me*
- *Shared viewing opportunities - programmes and broadcast events that I can watch and talk about with others, for example family or my peers*
- *National cohesion - the broadcasting of events that bring the nation together for a shared viewing experience*
- *None of the above*
- *Not sure*

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.*

To what extent do you agree or disagree with the suggestion that the public service media system needs to be reformed away from the current model that uses broadcast licences?

Options:

- *Strongly agree - the system definitely needs to be reformed away from using broadcast licences*
- *Agree - I agree that the system may need to be reformed away from using broadcast licences*
- *Neither agree nor disagree - No opinion either way*
- *Disagree - I do not agree that the system necessarily needs to be reformed away from using broadcast licences*
- ☒ *Strongly disagree - I feel strongly that the system should continue to use broadcast licences*
- *Not sure*

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

The broadcast licence requirement is in place for very good reasons. Broadcasters use scarce public airwaves that passively enter millions of homes across the UK. The licence comes with duties and content standards, for example, around accurate reporting, political neutrality, and protecting audiences from harmful and offensive content. Importantly, there are also accountability procedures in place. The government must ensure the regulator Ofcom always has the necessary powers to impose meaningful sanctions, including the option of removing an outlet's licence altogether if it repeatedly fails to meet the required standards. Ofcom must also ensure it is always acting in the public interest in performing its vital role as the government-approved regulator. It's worth noting that the NUJ condemned recent decisions to allow public service broadcasters, including STV and the BBC, to cut back on their public service broadcasting commitments.

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*
- ☐ *Agree*
- ☐ *Neither agree nor disagree*

- *Disagree*
- *Strongly Disagree*
- *Not sure*

Public service media content

- ☒ *Strongly Agree*
- *Agree*
- *Neither agree nor disagree*
- *Disagree,*
- *Strongly Disagree*
- *Not sure*

Systemic sustainability

- *Strongly Agree*
- *Agree*
- *Neither agree nor disagree*
- ☒ *Disagree*
- *Strongly Disagree*
- *Not sure*

The union supports having a mix of providers to increase the resilience of public service media. However, the description above relating to mergers and partnerships appears to be advocating for more syndication and a reduction in media plurality, which the union would reject.

A sustainable public service media compact

- *Strongly Agree*
- *Agree*
- *Neither agree nor disagree*
- ☒ *Disagree*
- *Strongly Disagree*
- *Not sure*

This question is too broad. For example, the term ‘commercially sustainable’ does not and should not apply to the BBC. Other public service media delivers vast benefits to the public and democracy and should not only be thought about in terms of profitability.

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.*

- *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).*

Please rank, in order, your preferred model of the public service media system, where 1 is your most preferred model:

Options:

- 1. A combination of the models*
- 2. A content centric approach*
- 3. A model focused on PSM services*
- 4. A model focused on PSM institutions*

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?*

N/A.

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?

See answer to question 13a re. groups that are more likely to be digitally excluded and the need to retain DTT.