



Consultation: Designation of Public Service Broadcaster Internet Programme Services

Comments from Paramount – Channel 5

31 March 2025

Channel 5, now '5', welcomes the opportunity to respond to Ofcom's consultation on the designation of Public Service Broadcaster (PSB) Internet Programme Services (IPS).

5 is an award-winning destination for factual programming, as well as drama, kids, news, and current affairs. Channel 5 offers audiences a high-quality, locally produced schedule, with a major focus on the UK's social agenda. It remains the only PSB to broadcast children's content on its main linear channel every day of the year. Regionality is also a core part of the success of our business model, and we invest heavily to support the creative economy outside the M25, across all nations and regions of the UK—more than 50% of the independent production companies we work with are SMEs.

As Ofcom has noted in its recent publications, PSBs occupy a special role in UK society offering a diverse array of informative and entertaining programmes that represent the various nations and regions of the UK, all freely accessible to everyone. For the past twenty years, the regulatory framework, Communications Act 2003, emphasized live TV channels. The Media Act 2024 is intended to provide greater flexibility to PSBs as audiences increasingly desire more control over how they access news, information, and entertainment, beyond what scheduled broadcast television can provide.

We broadly welcome the greater flexibility and freedom afforded to PSBs in how they fulfil their remit obligations with the ability to include the use of on-demand and other online services. We would note though that 5's linear channel remains a key vehicle to deliver content to our audiences alongside our on-demand service. As audiences transition to watching more TV through our apps and digital services we will experiment and seek to innovate to deliver the remit to both new and existing audiences. When considering IPS services for designation it is important that Ofcom's own framework acknowledges that we are in a period of transition.

Consultation question Q1. Do you agree with our proposed methods for determining whether the IPS makes, or is capable of making, a significant contribution to the PSB's individual public service remit?

- Ofcom's proposal is to designate services that make a significant contribution to a PSBs individual obligations, and to the wider PSB remit set out in the Media Act. The main criteria being that the service is free of charge (or at least it is free to access remit meeting content) and that it has a diversity of content to meet audience needs. Ofcom will assess the diversity and range of content on the service and how it links to the PSBs own plans for the service in its Statement of Programme Principles.
- We agree with Ofcom's general approach and appreciate that a new mechanism to allocate prominence to an on-demand service must be necessarily different to that which exists for linear TV.
- It is important to note however that each PSB has a different role to play within the wider ecology. Consequently, use of our IPSs to deliver the remit will vary significantly depending on commercial strategy and what audiences expect. The blend between, 'catch-up', 'digital first', and 'simulcast' viewing will vary greatly between services, as will the relationship between the on-demand service and the main linear channel. This should feature in Ofcom's considerations.
- Further, the content mix on each IPSs will also vary. In the linear environment Ofcom has historically acknowledged the complementarity that exists between PSBs. Each has their own approach to news, current affairs, factual entertainment, drama and children's content as they service slightly different audiences. It is important that Ofcom recognises these differences and assess each service on an individual basis rather than "against" each other. One service may have significantly more UK kids' content whilst another has more current affairs programming but both service are making a contribution to the collective PSB remit.

Consultation question Q2. Do you agree with our proposed methods for determining whether public service remit content included in the IPS is readily discoverable and promoted by the service?

We broadly agree with Ofcom's approach, however we would make the following observations that we feel Ofcom should consider when assessing the discoverability and promotion of public service remit content:

The continued importance of live TV

- The Media Bill has been important for PSB, it takes into account the shift to on-demand viewing that has taken place over the past two decades. Ofcom's description of how it will assess whether public service remit content included in the IPS is readily discoverable and promoted by the service understandably focuses on the on-demand aspects of a PSB IPS.
- However, as Ofcom has acknowledged, for many viewers the live TV experience remains important – PSBs in particular continue to provide a curated schedule of varied programmes that have become 'appointments' in their daily lives. As audiences migrate to IP TV delivery in the coming decade the simulcast of the main PSB licenced channel on an IPS will become increasingly important. On the new 5 streaming user-interface the linear channels are easily accessible. It is important that when assessing

a service for designation, Ofcom does not diminish the value of providing simulcast of the main PSB channel.

High traffic areas of IPSs are dynamic

- We note that Ofcom's approach to assessment of an IPS will focus on 'high traffic' areas of a user-interface. This is a sensible approach, the 5 streaming service homepage and high traffic areas promote some of the best in UK originated drama, factual and kids content as well as providing easy access to the live channels.
- But it should be noted that these areas of a user-interface are dynamic and will change throughout the year. National or global events may influence the content that is promoted, as will seasons of programming that we champion. In this context the consultations referencing to 'hammocking' is an important one – we may use a piece of commercial content on the home page to attract audiences to the service who may then find or be recommended PSB remit meeting content.

News and current affairs

- Across 2024, both 5 News at 5 and The Jeremy Vine Show posted record audience numbers. 5 News at 5pm, which is anchored by Dan Walker, grew by 4% for individuals to a 3.4% share (Barb – weekdays 5-6pm broadcast), making it the highest year since 2018 for the programme. The 4% growth was higher than any other early peak terrestrial competitor news broadcast.
- 5 News' share year-on-year in London, Ulster, Midlands and Scotland also increased. This continued growth reflects 5 News's distinctive style and reach among often underserved audiences, including a higher proportion of women and viewers from a diverse social economic background than average. For many regular viewers, 5 News is their main source of news each day.
- 5 News has improved its digital presence, with a new social strategy from the team helping the newsroom's social content reach more than 57.8 million views across all platforms in 2024. Followers across all 5 News's social platforms have also all grown over the past year. The 5 News TikTok account, which is aimed at a younger demographic than its linear audience, has led to substantial engagement from a growing group of 35–44-year-olds in particular.
- How this linear success and social media innovation should translate to the IPS is a work in progress – we do not believe there is a best practice model Ofcom can point to when assessing news and current affairs for the purpose of designation. Each PSB audience will have different needs and each IPS will have differing technologies available to be deployed and experimented with.
- The simulcast of main channel is an important vehicle for news delivery on 5's streaming service. However, we are currently assessing how we can better promote news and current affairs on the IPS in a way that feels in keeping with the service and will meet the expectations of our audience.

Consultation question Q3. Do you agree with our proposed methods for determining whether it is appropriate to designate an IPS?

- We do agree with the proposed methods.

Consultation question Q4. Do you agree with our proposed process for IPS providers to apply for designation of an IPS?

- The Ofcom proposal that that PSB IPS can submit applications for designation of their IPS before the new prominence regime has been commenced is welcome. We note that Ofcom would therefore like to receive applications including SoPPs by autumn 2025.
- We further acknowledge that Ofcom intends to publish its final SoPPs guidance in 'Summer', but clearly this window is broad and so if publication is delayed for any reason we would hope that Ofcom can be flexible with its timings in terms of receiving and reviewing SoPPs.

Consultation question Q5. Do you agree with our proposed methods for revoking an IPS designation?

- We understand that Ofcom may decide to revoke the designation of an IPS if it considers that there are reasonable grounds for believing that the IPS is not continuing to meet the designation criteria. We do not have any concerns regarding the process for revoking the designation of an IPS.
- However, it should be pointed out that fundamental changes have been made to the media regulation underpinning PSB as a result of the Media Act. In that context we would urge Ofcom to engage collaboratively in good faith with PSBs as they develop their on-demand services to deliver the best outcomes for audiences and Public Service Media, whilst being commercially sustainable.