

Your response

Question	Your response
Question 1: Do you have any comments on Ofcom's proposed Work Plan for 2025/26?	Confidential? – N

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Better Media Concerns for Ofcom's Proposed Workplan 2025/26

Better Media is committed to fostering a more democratic, participatory, and socially accountable media system in the UK. In response to Ofcom's proposed Work Plan for 2025/26, we have identified areas where the plan could be strengthened to better address the needs of citizens, community media, and regional diversity. Below is our detailed submission.

Better Media has made previous submissions to Ofcom's Workplan consultations, highlighting similar concerns and recommendations. Despite these efforts, progress in these critical areas has been limited. We believe that addressing these issues does not require a complete overhaul but can be systematically integrated into a multi-year workplan to ensure gradual yet meaningful advancements.

Community Media and Spectrum Access

The current broadcast radio spectrum access framework disproportionately favours large-scale providers, creating significant barriers for community and independent media to enter the market. Without equitable access to spectrum, these smaller providers struggle to participate in the media landscape, limiting diversity and local representation. Addressing this imbalance is essential for fostering a more democratic and participatory media system.

- **Equitable Licensing for AM/FM:** Open AM/FM spectrum to new entrants through an on-demand, transparent licensing process that ensures equal access for community and independent media providers. Ofcom's powers under Section 42 of the Media Act 2024 can be applied in the furtherance of market diversity and pluralistic supply.
- **Digital Move-Over Policy:** Transition from a *digital switch-over* to a *digital move-over* model, reserving analogue frequencies for local and community broadcasters,

should be enacted as a matter of urgency to ensure market stability and future viability.

- **Expedited SSDAB Licensing:** Allocate additional resources to accelerate SSDAB licensing. Publish real-time multiplex coverage maps and ensure pricing transparency for small-scale broadcasters.

In addition to addressing present operational necessities, it is crucial for Ofcom to anticipate future needs within the media landscape. Incorporating forward-looking strategies as part of the SSDAB roll-out will enable a more resilient and adaptable regulatory framework. This approach ensures that community and independent media providers can thrive in an evolving environment, thereby safeguarding market diversity and regional representation in the long term.

Public Service Media Reform

Public trust and engagement with large public service media organisations have declined, leaving a gap in the delivery of localised, relevant, and trusted content.

A renewed sense of urgency is required by Ofcom to consider the active and present threats to the UK's media and information management systems and infrastructure posed by internationally controlled media and technology platforms. These entities often operate beyond the reach of domestic regulatory frameworks, potentially undermining local media diversity, community engagement, and public trust.

Integrating community media, for example, into the broader ecosystem offers an opportunity to rebuild trust by fostering locally rooted, participatory, and diverse content creation.

- **Community Media in the Local Media Review:** Explicitly include community radio in the review with metrics for evaluating audience engagement, social gain, and regional impact.
- **Establish a Localness Test:** Ensure radio stations deliver meaningful local content through a comprehensive localness test assessing programming, community involvement, and audience relevance.
- **Economic Viability and Social Gain Reviews:** Commission independent reviews to assess the financial sustainability and social contributions of community media, incorporating findings into regulatory decisions.
- **Publish PSM Genres Framework:** Expedite the Media Act's requirement for Ofcom to identify the genres to be included in the framework for the BBC and other public service media providers.

Transparency and Data Accessibility

The lack of transparency in Ofcom's current data reporting limits public accountability and prevents stakeholders from effectively engaging with regulatory processes. Addressing these issues is crucial to ensure that decision-making is inclusive, and that diverse perspectives inform media regulation.

- **Public Registers:** Publish registers of interactions with lobbyists, trade associations, and independent research contributors.
- **Improved Reporting:** Adopt open data standards to provide real-time updates on licensing, spectrum usage, and compliance.
- **Accessible Platforms:** Redesign Ofcom's website to enhance accessibility, with dashboards tracking regulatory progress and key initiatives.

Diversity and Inclusion

Existing diversity monitoring frameworks often overlook the unique contributions of community media and freelancers. These groups play a critical role in fostering inclusive media landscapes, yet their work is frequently unrecognised. Incorporating these perspectives is essential to achieving a truly diverse and representative media sector.

- **Diversity Monitoring:** Include community and independent media in workforce diversity reporting, accounting for volunteers and freelancers.
- **Equality Impact Assessments:** Conduct comprehensive EIAs for all major decisions to evaluate their effects on underrepresented groups.
- **Support for Media Diversity:** Provide funding and training for initiatives promoting workforce, content diversity, and social gain within community media. For example, in addition to supporting stations through the Community Radio Fund, individual producers and projects should be supported with dedicated funding.

Civic Engagement in Regulatory Processes

The limited opportunities for grassroots and community organisations to influence regulatory decisions create a significant barrier to inclusive policymaking. Expanding participatory mechanisms is essential to ensure that a wider range of voices informs media regulation and fosters trust in Ofcom's processes.

- **Participatory Consultation Practices:** Adopt participatory practices, including open forums and plain-language summaries, to engage a broader range of stakeholders.

- **Community Media Advisory Group:** Establish a standing open advisory group to represent community and independent media in Ofcom’s policymaking.
- **Transparent BBC Oversight:** Establish a standing open advisory group to ensure BBC oversight includes public consultations and independent reviews of engagement processes, particularly regarding local radio.

Alignment with Devolution Policies

Current policies insufficiently address the distinct media needs of devolved regions, risking a one-size-fits-all approach that neglects regional diversity. Tailored strategies are essential to ensure that media regulation reflects the unique identities, languages, and priorities of each devolved area.

- **Support Regional Media Ecosystems:** Align media regulation with devolved governance priorities, supporting place-based media initiatives.
- **Devolved Media Forum:** Create a forum for representatives from devolved regions to inform policy decisions.
- **Invest in Local Media Infrastructure:** Fund initiatives that expand SSDAB coverage and promote regional content production.

Online and Digital Media

The dominance of major platforms stifles innovation and prevents grassroots digital initiatives from thriving. This imbalance hinders the development of democratic and participatory digital spaces, which Better Media advocates as essential for a diverse and equitable media ecosystem.

- **Support Grassroots Digital Media:** Provide assistance and technical guidance to independent digital platforms, prioritising participatory values.
- **Platform Accountability:** Enforce transparency in platform algorithms and revenue-sharing models to ensure fairness for small content creators.
- **Digital Literacy Initiatives:** Invest in nationwide programmes to empower citizens to critically engage with online content.

Regulatory Oversight and Accountability

Current oversight mechanisms fail to hold large-scale providers accountable for their impact on media plurality and local content delivery. Strengthening these mechanisms is vital to ensure that regulatory decisions foster a diverse and representative media landscape.

- **Monitoring Large Providers:** Strengthen oversight of large-scale providers to ensure compliance with local content obligations.
- **Market Impact Transparency:** Publish detailed assessments of regulatory impacts on small and independent providers.
- **Stakeholder Feedback Mechanisms:** Create accessible platforms for stakeholders to raise concerns about regulatory decisions.

General Principles

Ofcom's approach must address systemic barriers that prevent smaller, independent media providers from thriving in a competitive environment. By embracing principles of transparency, fairness, and inclusivity, Ofcom can ensure its regulatory framework actively supports a diverse and equitable media system.

- **Transparency and Fairness:** Ensure that regulatory processes are open, accountable, and prioritise the public interest.
- **Support for Independent Media:** Actively address barriers to entry and sustainability for community, independent, and place-based media providers.
- **Empowering Stakeholders:** Engage citizens, civic groups, and community organisations to shape a regulatory framework that reflects diverse perspectives and needs.

Better Media appreciates the opportunity to contribute to Ofcom's consultation and urges Ofcom to adopt these recommendations to foster a media system that prioritises participation, diversity, and regional representation. We remain committed to working collaboratively with Ofcom and other stakeholders to achieve these objectives.