

Organisation Name Withheld 12

Question	Your response
Question 1: Do you agree with the proposed amendments to Rule 5.3 of the Ofcom Broadcasting Code? Please give reasons for your answer.	We partially agree with the proposed amendments to Rule 5.3. While we do not consider the amendments strictly necessary – as existing rules within the Code already cover the principles of due impartiality – we acknowledge that the proposed changes may provide helpful clarification, particularly through associated guidance. We welcome the guidance accompanying the amendment, which confirms that the change will not prohibit politicians from presenting or hosting current affairs programmes (e.g., audience phone-ins or discussions). This reassurance is helpful in delineating the scope of the amendment. However, we have concerns about the terms “newsreader”, “interviewer”, or “reporter”, particularly because the proposed changes would apply to all programmes, not just news. We seek greater clarity on how Ofcom intends to define and apply these roles, especially in dynamic or unplanned broadcast situations. In the event of a breaking story — such as a terrorist attack, major explosion, cyber-attack, or large-scale protest — if a politician-presenter crosses live to a correspondent or interviews a witness, does that make them a “reporter” or “interviewer” under the Code? If so, would this engagement breach the amended Rule 5.3? We also request further clarity on the phrase “editorially justified”. In live broadcasting, the ability to communicate fast-developing stories in real-time is critical to informing the public. It seems disproportionate to imply that a politician presenter engaging with news content in this context might breach impartiality rules, especially when the delivery of such content is clearly in the public interest. In summary, while we appreciate Ofcom’s intention to safeguard due impartiality, we believe: • The amendment risks over-complication of what is already well-regulated. • Key definitions need further clarification.

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	Real-world broadcasting scenarios — especially live news or urgent events — should be exempt or clearly guided under the concept of editorial justification. We would welcome further guidance and examples to ensure confident compliance with the revised rule.
Question 2: Do you consider that Rule 5.3 of the Ofcom Broadcasting Code, if amended as proposed, will provide sufficient protection for audiences? Please give reasons for your answer.	We believe that Rule 5.3, as it currently stands, already provides sufficient protection for audiences. In our experience, the existing framework within the Broadcasting Code sets out clear and enforceable standards to maintain due impartiality and prevent political influence over news delivery. To date, news bulletins have never been delivered by a politician on our services, nor have we encountered any scenarios where Rule 5.3 has proven inadequate in protecting audiences from bias or political interference. This suggests that the present rule is effective in practice. Given the above, we do not believe that the proposed amendment is necessary to strengthen audience protections. The current framework is adequate, and the proposed changes risk introducing complexity without clear benefit, particularly given the strong compliance culture and editorial safeguards already in place. In summary, Rule 5.3 in its existing form is already robust and fit for purpose. We are not persuaded that the proposed amendments would materially enhance audience protection.
Question 3: Do you agree with the assessment of the potential impacts of the proposed amendments to Rule 5.3 of the Ofcom Broadcasting Code (as set out in Annex 2)? Please give reasons for your answer.	We believe the potential impact of the proposed amendments has been underestimated, particularly with regard to the operational and editorial implications for radio broadcasting. Annex 2 does not sufficiently reflect the practical realities and constraints broadcasters may face when complying with a broadened application of Rule 5.3. The further restrictions introduced by these amendments could discourage politicians from engaging in legitimate, impartial programming, especially in the radio sector where current affairs and audience

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	interaction formats often rely on political voices to contribute to public discourse. This may unintentionally narrow the range of political perspectives available to audiences, undermining the diversity of opinion that is essential in a democratic media environment. We also note that the proposed amendments do not appear to align with Ofcom’s own audience research. The audience feedback presented does not clearly indicate demand for additional restrictions on politicians’ roles in non-news programming. As such, it is unclear whether these changes are proportionate or evidence-led. In conclusion, we do not agree with the impact assessment provided in Annex 2. We urge Ofcom to reconsider the broader implications for editorial flexibility, political diversity, and audience access to a range of viewpoints, particularly within the radio sector.
Question 4: Do you agree with the proposed amendments to the Guidance on Rule 5.3?	We recognise, as Ofcom does, that UK broadcasters bear a significant responsibility to maintain due impartiality, a principle that is increasingly important in today’s political and media climate. However, we strongly believe that this must be balanced with the equally critical principle of freedom of expression — particularly in the domains of news and politics. Facilitating open exchange between the public and politicians — through debate, scrutiny, and the challenging of viewpoints — deepens democratic engagement. We are proud to contribute to a media environment that supports informed, nuanced political dialogue, providing an important alternative to reductive soundbites and polarising social media echo chambers. We fully support transparency as key to maintaining audience trust. As Ofcom will be aware, politicians do not deliver news bulletins on our platforms. They host current affairs programmes — such as audience phone-ins and panel discussions — where: • A range of views are always presented, • Political affiliations are made repeatedly clear, and • The principle of due impartiality remains rigorously observed.

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	We welcome Ofcom’s clarification in the revised guidance, particularly the acknowledgement that politicians can continue to host current affairs programmes. The explicit reference that <i>“politicians are allowed to present current affairs programmes such as audience phone-ins and discussion programmes”</i> is helpful and reassuring. That said, we remain concerned by the ambiguous terms such as “interviewer” and “reporter”, particularly when these roles are now subject to restriction across all programming. These terms are not clearly defined and may unduly limit a politician-presenter’s ability to appropriately respond during live or evolving editorial contexts—for example, posing a question to an on the ground reporter or contributor during a breaking news update. We would also welcome greater clarity around the reference to “exceptional circumstances”: • What specific criteria would Ofcom apply to determine whether a politician’s role as an “interviewer” or “reporter” could be editorially justified? • Would covering a live, high-impact event (e.g. a major protest or security incident) constitute such an exception? We agree with much of the proposed guidance but believe it should go further in offering clear, operational definitions and practical editorial flexibility. Without this, the amendments risk being overly restrictive and counterproductive, potentially limiting audience access to rich, diverse current affairs programming led by individuals with real political insight.
Question 5: Do you have any other comments to make on the proposals, including in relation the scope of the proposed changes?	We reiterate our position that the proposed amendment to Rule 5.3 is unnecessary. The existing provisions within the Ofcom Broadcasting Code already deliver robust and effective protections for audiences. Introducing additional restrictions risks creating complexity without delivering material improvements to the viewer or listener experience. Given that a consultation is underway on Rule 5.3, we

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	believe it is timely to raise a significant concern regarding the scope of Ofcom’s current definition of a “politician” in the associated guidance. The definition — which includes “an employee working for a political party as well as any activist” — appears overly broad, especially in the context of the proposed amendments. If the rule is to be applied more widely across all programming, then so too will this expansive interpretation of who qualifies as a politician. This could result in unintended and overly restrictive outcomes for individuals who are not elected officials and do not represent political parties in any formal or public capacity. Applying Rule 5.3 to individuals who may have some political association or background, but who are not politicians in the conventional sense, risks deterring legitimate participation in current affairs programming and diminishing editorial diversity. This may ultimately have a chilling effect on the breadth of opinion and experience reflected in UK broadcasting.

Please tell us how you came across about this consultation:

☒ Email from Ofcom

☐ Saw it on social media

☐ Found it on Ofcom's website

☐ Found it on another website

☐ Heard about it on TV or radio

☐ Read about it in a newspaper or magazine

☐ Heard about it at an event

☐ Somebody told me or shared it with me

☐ Other (please specify)