

Philip Henfrey, Wales Director

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Ofcom

By email only

13 February 2026

Public Service Broadcasting in Wales

Dear Philip and Cristina,

Thank you for your evidence on 22 January 2026. We have a number of recommendations and further queries which we set out below.

Overview

In the Committee's 2024 report, State of Play, we recommended:

Ofcom should improve its analysis of media provision in Wales, including by increasing staffing levels in Wales.

As a Committee, we agree with the view of our predecessor committee that the supply of media content for Wales is inadequate. In our 2024 report we said that "It is hard to see improvements coming from Ofcom regulation of broadcast media in Wales." Following our meeting on 22 January, we are still of this view.

We are concerned that your analysis of broadcasting in Wales is overly optimistic. You said you were "seeing more content being created in Wales" and noted that "Wales accounted in 2024 for 6 per cent of network hours and 5 per cent of qualifying network spend."

Conversely, and to take another figure, public service broadcasting (PSB) spend on first-run, UK-originated content for Wales was £33.1 million in 2024, compared with £33.6 million in 2018 (figures in



Ofcom's Media Nations: Wales 2025), which represents a real-terms reduction of about 28 per cent. People in Wales continue to be under-served in terms of media content about their lives.

This represents a disadvantage to Wales and its people on both a civic and democratic level, because people can't see themselves on their screens, and are less informed about the political structures that govern much of their lives. The Welsh Government, this Committee and the Independent Commission on the Constitutional Future of Wales have all raised concerns about the insufficiency of Welsh media content. We are concerned that Ofcom's analysis is based on narrow metrics and misses this bigger picture.

A [2023 Freedom of Information response](#) showed that, at the time, about 1 per cent of Ofcom's staff were based in Wales. 16 were based in Cardiff, compared with 68 in Edinburgh and 13 in Belfast. We find it hard to justify this low proportion of staff based in Wales, especially given the additional needs in Wales of catering to Welsh language audiences.

Recommendation 1: Ofcom should use both its regulatory levers and substantial influence to improve the provision of media content for Wales.

Recommendation 2: Ofcom should provide current staffing levels for its offices across the UK, and explain how the seniority of staff in Wales compares with other offices across the UK. It should provide the median pay for its Cardiff office, and how this compares with the UK Ofcom median pay.

Recommendation 3: Ofcom should increase its number of employees in Wales.

ITV network spend in Wales

In our 2024 report, State of Play, the Committee recommended:

Ofcom should include a requirement for the Channel 3 licence in Wales to produce a greater proportion of network content in Wales. It should report to back to the Committee outlining how it will do this.

The current channel 3 licence in Wales, which was renewed in 2024 for ten years, does not include this requirement. The licence includes a broader requirement that at least 35 per cent of originated network content is made outside of the M25 area.

In 2024, according to Ofcom figures, ITV's network spend in Wales was 0.8 per cent of the UK total (see graph at Annex A), which was a slight increase from 2022, when the figure was close to 0.

We remain of the view that ITV's network spend in Wales is unacceptably low, and following our meeting, are not reassured that ITV has a meaningful plan to increase it.

In our meeting you said that you “looked at their evidence last week, and there is an intent there (*to increase network spend in Wales*)” and that you “want to see them reflecting the audiences and audiences' lives, in a way that also is sustainable.”

We are disappointed that you seemed content that only 0.8 per cent of ITV’s UK network spend is within Wales. We appreciate that ITV’s current licence does not compel them to spend more within Wales, but we feel that Ofcom has substantial influence that it could use to encourage ITV to spend more in Wales. We feel that in this, as in other areas (such as discussions of prominence guidelines), Ofcom seems to be operating more as an advocate for the broadcasting industry than a representative of audiences and citizens.

Recommendation 4: Ofcom should work with ITV to increase its UK network spend in Wales.

Prominence and accessibility on connected television platforms - Draft code of practice and draft guidance on the agreement objectives

On 14 January 2026, Ofcom launched a consultation: [Prominence and accessibility on connected TV platforms - Draft code of practice and draft guidance on the agreement objectives](#). Ofcom explained:

“The Media Act 2024 introduced essential new rules to help make public service content easier to find and discover on the connected TV platforms that people increasingly use to choose and access TV programmes. These connected TV platforms must also take steps to incorporate accessibility features.”

“Under the new regime, for the first time, providers of the most-used connected TV platforms must make sure that BBC iPlayer and other public service broadcaster (PSB) TV players as designated by Ofcom, as well as the public service content and any public service channels they include, are available and prominent on their platforms.”

We discussed these proposals with witnesses. The BBC felt that “Our biggest issue is speed. We need the pace.”

S4C had specific concerns:

“There's no regionalisation that's being mandated across all tech platforms. So, that is, you could have a situation where, shall we say, Roku, to discuss your example, may decide that S4C won't get any further prominence in Wales than it gets across the whole of the UK.”

“From what we understand, with the draft prominence code, will be able to reorder these tiles or delete the tiles. Now, that is not going to give us prominence.”



"There's no guarantee that the PSB rail will be on the homepage."

"We do feel that our current prominence could be diminished unless these securities are put in place."

"We were definitely not convinced that Ofcom would do our work for us with the tech platforms."

This is a summary of S4C's concerns, and we urge you to watch the session and meet S4C to discuss these concerns in detail.

We discussed some of these concerns with you. On the subject of regionalisation, you said "some of the TV platforms are able to do nationalisation/regionalisation, and some aren't." We are concerned that you may be accepting the position of television platforms without pushing back in the interests of UK audiences. In a world of hyper-personalised digital services, it doesn't seem beyond the abilities or resources of a multi-national company to provide regional services across the UK.

S4C, as the only broadcaster which operates solely in the Welsh language, is particularly vulnerable to a loss of prominence in the multi-channel, multi-platform world. As its Chair told us, "visibility is viability." We feel that their views are a litmus test for the suitability of your proposals, which in their current state, has not been met. A central principle, we think, is that S4C – and the other PSB channels – should not have their current prominence diminished under the new code of practice.

We are troubled that S4C were not certain of Ofcom's support in negotiations with TV platforms. As a publicly-funded, minority language broadcaster, there will be a financial asymmetry between S4C and the multi-national companies it is dealing with. Disagreements between PSBs and platforms seems likely, with Professor Justin Lewis telling us: "I do worry a little bit about global platforms being a little bit cute about the way that they interpret prominence."

S4C needs a strong regulator, with audiences at its heart, to make this a fair negotiation. S4C would benefit from clearer guidance. Ambiguity creates opportunities for disagreement with TV platforms, which could be costly and time-consuming for S4C to resolve.

You told us that you were "not prescribing on any PSB that you have to be a part of this, because at the end of the day, a PSB can take a decision, because there are requirements on the PSBs." We think that Ofcom will have failed significantly if its designs a prominence system that PSBs do not think it is worth signing up to. We urge you to address concerns raised by PSBs so that this does not happen.

Recommendation 5: Ofcom should revise the draft code of practice on prominence and accessibility on connected television platforms so that UK PSBs receive equivalent prominence as they do at present under the Electronic Programme Guide code.

Recommendation 6: Ofcom should revise the draft code of practice on Prominence and accessibility on connected television platforms so that S4C receives greater prominence within Wales than it does across the UK as a whole. S4C should also receive prominence across the UK, in recognition of its audiences outside of Wales.

Recommendation 7: Ofcom should make it clear that it supports PSBs in their negotiations with television platforms. To this end, Ofcom should provide clearer guidance, so that there is less scope for disagreement between PSBs and platforms.

Network news

In our 2024 report we recommended:

Ofcom should continuously review UK network news coverage of devolved policy issues. It should report to back to the Committee outlining how it will do this

We discussed the extent to which network news accurately reflects the devolved nature of the UK with Professor Stephen Cushion of Cardiff University's School of Journalism, Media and Culture. He told us:

"Over recent years, standards have slipped a little bit, and it's perhaps a time to reset and to rethink again, particularly as we approach an election campaign in Wales and Scotland coming up, to reset and to actually think through again how network news are presenting politics across the UK."

He mentioned ongoing research into how broadcasters' social media posts reflect devolution, noting that "there is an awful lot—far more than we've ever found before—of headlines that simply make devolution invisible."

Too often, network news providers still broadcast as though doing so to audiences in England alone: that is, they too often merely explain that a certain UK Government policy applies only in England, but do not show the curiosity to explore what is happening in other UK nations. Reflecting the devolved nature of the UK isn't simply a case of adding "in England" to a news bulletin, but re-thinking how political news is presented to reflect the reality of how the UK is governed. This is an issue of accuracy, not just for audiences in Wales, but across the UK, and so is a matter which should concern Ofcom. We reiterate our previous recommendation:

Recommendation 8: Ofcom should continuously review UK network news coverage of devolved policy issues. It should report to back to this Committee (and a future Senedd committee) outlining how it will do this.

Thank you for your comments about the BBC Charter Review Green Paper. We will consider these comments in our response to the UK Government.

Yours sincerely,



Delyth Jewell MS

Chair

Culture, Communications, Welsh Language, Sport and International Relations Committee

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.