



Media regulation in the era of Generation Alpha

Preparing for the expansion of content
compliance and public service prominence
regimes

MAY 2025

Executive Summary

Media regulation is currently evolving in response to profound changes in how consumers access audiovisual content. In the UK, Ofcom is in the process of implementing the new Media Act, the biggest change to the UK's media regulatory framework in over 20 years. There are many different elements to the Media Act, and Ofcom's guidance is still expected in a number of important areas.

In this article we focus on two specific elements of Media Act implementation:

- First, the new **content compliance** requirements (such as audience protection measures) that large streaming services will need to comply with, similar to those that already exist in a 'traditional' broadcast (i.e. linear) TV environment.
- Second, the **public service prominence** requirements that connected TV platforms will need to comply with, which ensure public service content is easy to find and watch.

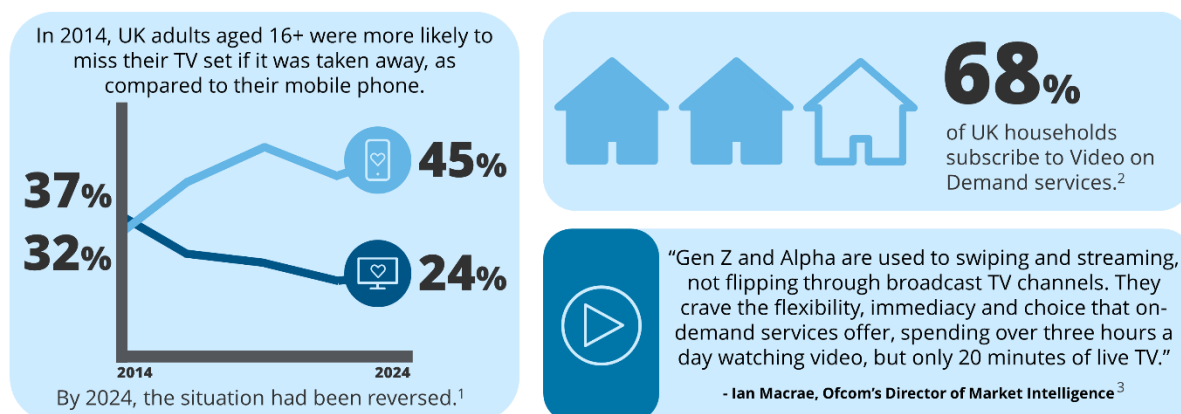
For each area, drawing on our knowledge of the existing rules that apply to linear TV, we identify a number of actions, and questions, that the services likely to be in scope of these requirements should be considering now.

Given the pace of change, policymakers in the UK and the EU are already highlighting that further regulatory change may be required, given the role of online platforms, influencers and AI in the modern media landscape. Therefore we conclude with a horizon scan of the topics that policymakers will also be assessing going forward.

1. A changing environment for media consumption

Viewers are now using both a wider range of devices to access media content as well as a larger variety of services. These trends are particularly pronounced amongst younger demographics, such as Generation Alpha and Generation Z. Examples of this evolving environment are set out in **Figure 1** below.

Figure 1: Examples of changing media consumption in the UK¹



¹ Sources: ¹[Adults' media use and attitudes 2025](#), ²[Media Nations: UK 2024](#), ³[Gen Z swerves traditional broadcast TV as less than half tune in weekly - Ofcom](#)

2. An expanding UK regulatory regime for content compliance and public service prominence

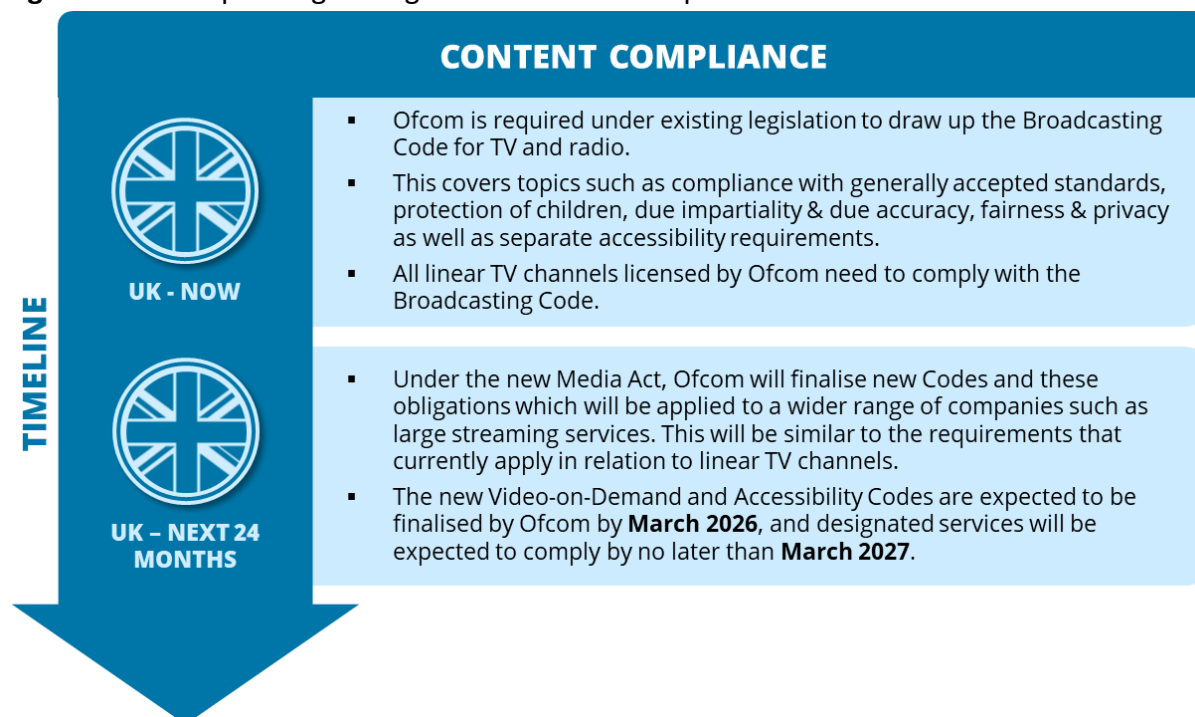
The new UK Media Act marks a regulatory step change which aims to address the significant shifts in the way that audiences now consume audiovisual content. In this article we focus on the implications of the Media Act for two types of company. First, the new **content compliance** obligations that designated large streaming services will need to comply with, as set out in Section 3 below. Second, the **public service prominence** obligations that designated connected TV platforms will need to adhere to, as set out in Section 4.

3. How should large streaming services prepare for the new UK content compliance regime?

The new UK regime introduces a new content compliance regime for large streaming services to ensure sufficient protection for on-demand viewers, similar to that which currently exists in a linear, broadcast TV environment. These changes will apply to any large streaming service designated by the Secretary of State (expected by the end of the year) as a 'Tier 1' service, based on consideration of a market report from Ofcom. It is likely that key criteria for 'Tier 1' services will include size and popularity and will therefore include all large public service broadcaster streaming services and commercial streaming services. The implications for commercial streaming services are likely to be most profound, as some may not have previously been regulated by Ofcom, or where they have, been subject to far fewer high-level content rules under Ofcom's existing regime.

An overview of the current landscape, as well as the changes that are expected in the next 24 months, is set out in **Figure 2** below.

Figure 2 – the expanding UK regime for content compliance²



² Please note timelines are accurate as of the time of writing based on the timescales on Ofcom's [website](#)

Set out below are five content compliance topics that we think are particularly important for large streaming services to consider, along with actions that can already be taken to prepare. This is in anticipation of further activity from both Ofcom and Government to implement the new regime.

I. Compliance with generally accepted standards

Requirements under the existing regime for linear TV services - The existing regime for linear services includes measures to ensure that factual programmes do not ‘materially mislead’ the audience and that offence must be justified by the context.

How streaming services can prepare for the new regulatory regime – Large streaming services should consider how their current content compliance processes or editorial guidelines map against the requirements of the new Ofcom Code that they will need to comply with (the ‘Video-on-Demand (VOD) Code’) and make changes to incorporate the new rules once these changes are finalised. Streaming services should also consider their approach to archival content on their services. Although Ofcom will need to ensure that its approach is proportionate and consider the length of time a programme has been on a service, content that complied at one point in time may require further consideration over time - for example in areas such as offensive or discriminatory language where audience expectations can evolve. Robust complaints systems can act as an important mechanism to alert compliance teams to potential issues so that they can take swift action as soon as they become aware. Effective warnings are also a key mechanism to ensure that material which may be potentially offensive is flagged.

II. Audience Protection, including protections for children

Requirements under the existing regime for linear TV services - Ofcom’s existing Broadcasting Code for linear TV contains a wide range of protections for children. This includes rules around offensive language, dangerous behaviour that is ‘easily imitable’ by children in a manner that is harmful and ensuring that due care is taken over the welfare and the dignity of under 18s who take part in programmes. The 9pm watershed also provides a key mechanism for protection of children on linear services.

How streaming services can prepare for the new regulatory regime - Ofcom’s current high-level VOD rules protect children from ‘specially restricted material’ and material likely to impair those under 18. Under the new VOD Code, a far wider range of rules is likely to mirror the existing Broadcasting Code. However, the watershed will not be directly transferable to VOD services. Ofcom is currently undertaking research on audience protection measures on VOD services which is likely to inform future guidance. Notably, recent research it published found³ that over half of 12-15 on-demand viewers have been asked their age while watching such services – but a third said they have given a false age. Services should therefore consider the efficacy of their current audience protection measures, which could include age assurance and parental controls, and ensure they are prepared to meet the specifications set out in Ofcom’s new guidance.

³ [Ofcom Cross Media Platform Tracker 2024](#)

III. Due impartiality & accuracy

Requirements under the existing regime for linear TV services - under the Broadcasting Code, 'due impartiality' applies to (among other things) 'matters of political or industrial controversy and matters relating to current public policy'. These rules are most likely to be engaged in news and current affairs programming – although they can be engaged in any genre when current events are covered. Ofcom's approach on 'due impartiality' is well established.

How streaming services can prepare for the new regulatory regime - A key challenge in moving the due impartiality regime from a linear to an on-demand environment is that consideration of due impartiality will depend on the facts at the time of broadcast. Large streaming services should consider the likelihood that content may be subject to these rules and how they will ensure it continues to comply with the 'due impartiality' requirements over time, if context changes.

IV. Fairness & privacy

Requirements under the existing regime for linear TV services - Existing fairness rules for linear TV aim to protect individuals against unfair treatment in programmes, for example by ensuring that (i) participants have a right to reply in situations where significant allegations are made about them, (ii) broadcasters can demonstrate they have the informed consent of participants, (iii) contributions are fairly edited, and (iv) due care is taken over the welfare of participants, particularly those who might be vulnerable or where the programme is likely to attract a high level of press, media or social media interest. These rules have been in the spotlight in recent years as concerns have been raised about the welfare of people, particularly in reality TV programming. Existing linear privacy rules aim to ensure that the right of privacy of an individual or organisation is not subject to unwarranted infringement (in respect of both the programme as broadcast but also the making of the programme).

How streaming services can prepare for the new regime - The details of the new fairness and privacy rules in the new UK media regime are yet to be determined. However, their inclusion in the Media Act means that designated streaming services will need to ensure they have compliance systems and processes in place to consider the privacy of individuals during the making and broadcast of programmes and take appropriate measures to ensure they protect vulnerable participants. This could represent one of the most profound impacts of the new regime as it will mean that large streaming services will need to work with programme makers to meet a range of obligations around the individuals who feature in their programmes.

V. Accessibility

Requirements under the existing regime for linear TV services – Ofcom's Code on Television Access Services sets out the guidance and requirements for subtitling, sign language and audio description that apply to television services currently regulated by Ofcom.

How streaming services can prepare for the new regime - Streaming services should consider how they will meet the new accessibility requirements for subtitling, audio description and sign language. While some have done this voluntarily in the past, the Media Act means that all Tier 1 services must meet new statutory targets, which will increase over time, and report these formally to Ofcom. Over time at least 80% of the total catalogue of the service will need to be subtitled and at least 10% of the total catalogue audio-described. In a recent report⁴ Ofcom stated that the most common barrier for VOD providers providing access services was technical development cost, due to the technical challenges presented given the lack of standardisation across third-party platforms. It is important for large streaming services to act now to understand their current provision, map this to the new specifications once the new Accessibility Code is published by Ofcom and ensure that they are addressing the technical and cost implications of meeting these new requirements.

Consideration with requirements already in place in the EU

Finally, it will be important for large streaming services to consider how these requirements map against existing European regulation of VOD services. For example, for those services registered in Ireland under the regulatory jurisdiction of Coimisiún na Meán, there are already accessibility requirements and age assurance considerations under the new Media Service Code and Rules which have been in place since November 2024. Platforms should consider how these requirements intersect with UK obligations in order to instigate policies and systems that can satisfy the requirements of multiple regulators, where possible.

4. How can connected TV platforms prepare for the new public service prominence regime?

The new UK regime will require that designated connected TV platforms (such as Smart TV, set-top-boxes and streaming sticks) ensure that Public Service Broadcaster TV apps, as well as their public service content, are available, prominent, and easily accessible.

“The prominence changes are at the heart of the Media Act; they are probably the most important thing in terms of securing the role of the PSBs for the future.”

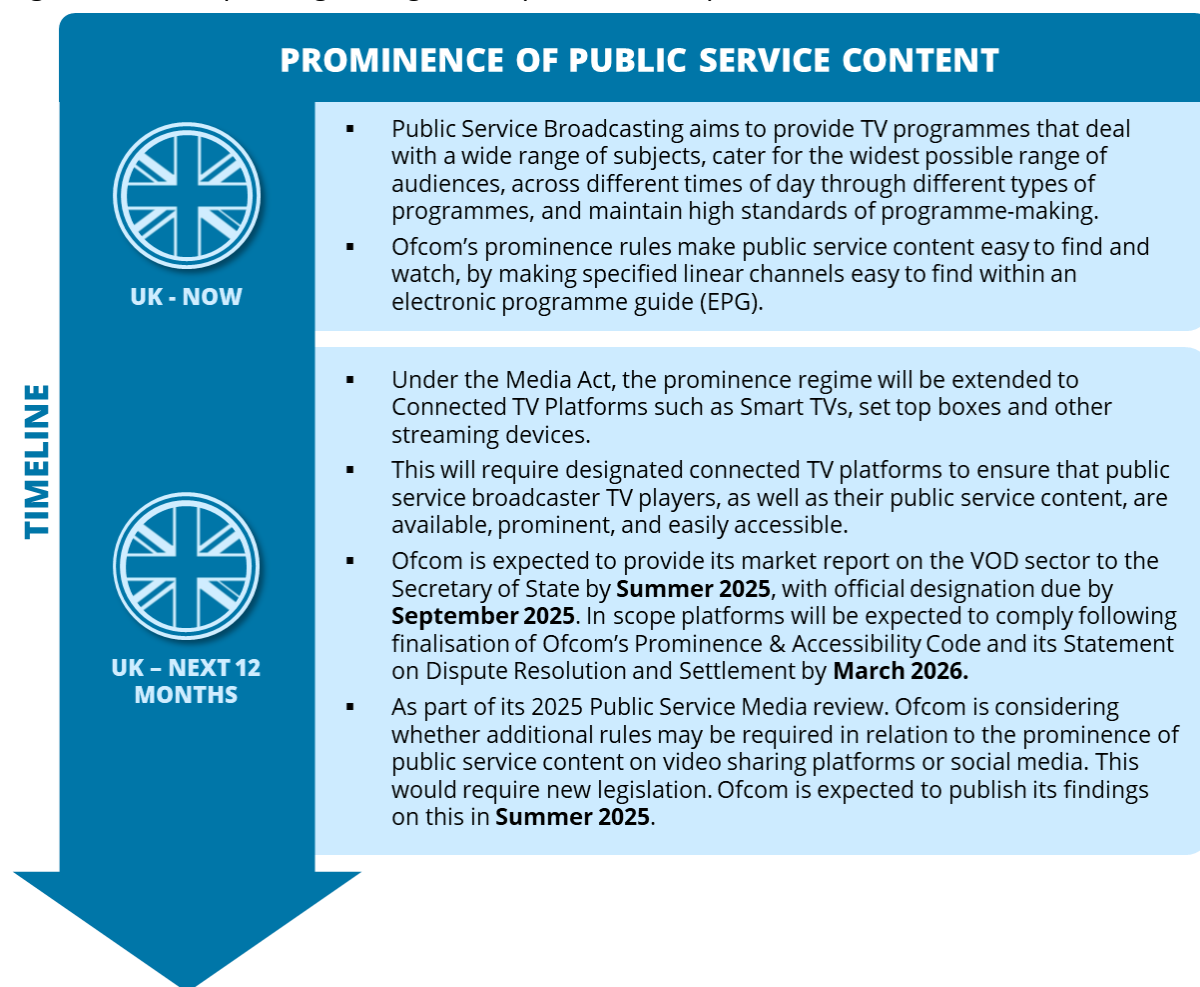
- Dame Melanie Dawes, Chief Executive, Ofcom, Oral Evidence to the House of Commons Select Committee on Culture, Media and Sport, 6 May 2025

Ofcom will shortly finalise the principles and methods that it will apply in this respect and report to Government with recommendations for designation of the connected TV platforms that should be subject to this requirement. This includes criteria such as the number of people using that platform, and the technical functionality of the platform. The designation of the connected TV platforms that will be in scope of the new requirements is expected in Autumn 2025.

A high-level overview of the current landscape, as well as the changes that are expected in the next 12 months, is set out in **Figure 3** below.

⁴ [Television and on-demand programme services: access services report – January to December 2024](#)

Figure 3 – the expanding UK regime for public service prominence⁵



Connected TV platforms potentially subject to these new requirements should already be considering a number of key questions relevant to compliance with prominence obligations, including:

- How will Ofcom's designation criteria be applied and is the platform likely to be within scope?
- Are there any technical considerations which may have an impact on the platform's ability to give due prominence to public service content?
- Are there any other issues, for example in cases where software is licensed to third party platforms, which may create uncertainty as to which provider has control over the service in question?
- How will terms of trade be negotiated between connected TV platforms and public service broadcasters, and how should advertising revenues and data be shared going forward?
- Once future Codes are published, how best to ensure that commercial arrangements with public service broadcasters are compliant with Ofcom's requirements?

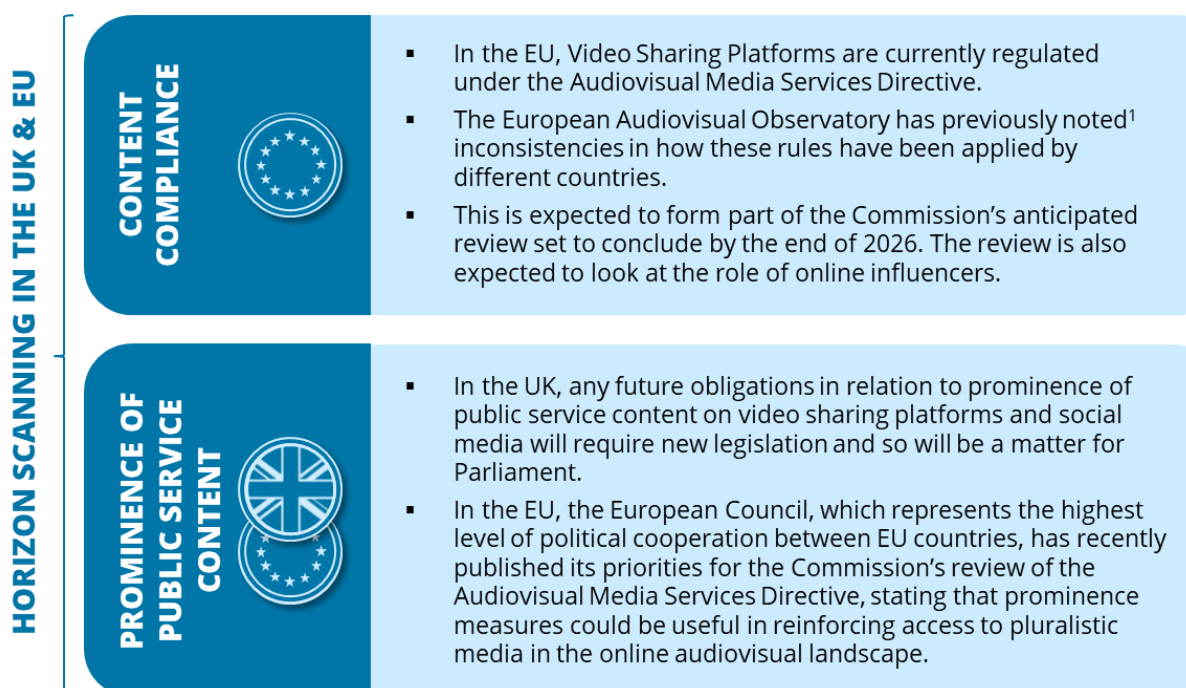
⁵ Please note timelines are accurate as of the time of writing based on Ofcom's [website](#)

These last two points are particularly important given Ofcom’s role as the backstop to determine any resulting prominence disputes between public service broadcasters and designated connected TV platforms. As part of its dispute resolution role, Ofcom can fix the terms or conditions of transactions between the parties and give a direction requiring payments if required. Ofcom can also require a party to the dispute to be responsible for both its own costs in resolving the dispute, as well as costs that have been incurred by the other party. Ofcom’s guidance in this area is awaited, although it has previously signalled the objective of ensuring fair commercial deals that enable public service media providers to engage with audiences effectively. The potential for Ofcom intervention raises a number of strategic and commercial considerations for the companies concerned – including the areas of data and advertising revenue sharing, which should be worked through well in advance of any Ofcom intervention.

5. Horizon scanning in the UK and EU

Given the pace of change, officials in the UK and the EU are already considering whether additions to existing media regulatory frameworks might be required. This has implications for other ecosystem players beyond large streaming services and connected TV platforms, in particular large online platforms. A high-level overview is set out in **Figure 4**, below.

Figure 4 – horizon scanning for content compliance and public service prominence in the UK & EU⁶



In the UK, as set out in Section 4, Ofcom’s Public Service Media Review statement is due this summer. This is expected to examine the question of public service prominence beyond connected TV platforms, potentially in relation to social media platforms. Although it will not

⁶ Source: ¹[Mapping on national rules applicable to VSP - Focus on CC](#)

result in immediate regulatory change, the recommendations relating to prominence will be an important signal to Government in terms of potential future new media legislation.

“In Summer 2025, we will publish our findings on how to maintain and strengthen the provision of public service media content for the next decade. This could include areas where we are planning to consult on changes to some of our rules, as well as identifying where further Government intervention may be needed.”

- Ofcom, update on its review of Public Service Media, 17 December 2024

In the EU, the debate about what form future media regulation should take has already started, in the run up to the European Commission’s anticipated review of the Audiovisual Media Services Directive next year. Indeed, the European Council, which represents the highest level of political cooperation between EU countries, has recently published its priorities for this review,⁷ noting the fast evolving media landscape in this respect.

“EU-wide rules governing television and on-demand services need to reflect the rapidly changing landscape for audiovisual media, including the rise of influencers, the spread of disinformation and the growing use of artificial intelligence.”

- European Council, Press Release on Council priorities for the audiovisual media sector, 13 May 2025

6. Contacts

Deloitte’s Digital Regulation team is always happy to discuss any of these issues and more – please feel free to get in touch if you’d like to discuss further.



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Sian is a Director in Deloitte’s Digital Regulation team, leading on Media Regulation. She has extensive regulatory experience across broadcast and video-on-demand content standards and content policy. Prior to joining Deloitte, Sian was a senior decision maker at Ofcom where she led a team delivering media policy and enforcement. She also has a background in broadcast journalism, having worked as a producer in TV current affairs and news.



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⁷ [Council sets out its priorities for the audiovisual media sector](#)



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