

NUJ submission to Ofcom's consultation: proposed changes to the BBC's Operating Licence

November 2025

About the NUJ

The National Union of Journalists (NUJ) is the voice for journalism and journalists in the UK and Ireland. It was founded in 1907 and has more than 22,000 members working in newspapers, news agencies, digital media, magazines, book publishing, public relations, photography, videography and broadcasting.

The NUJ represents numerous journalists across England, Scotland, Wales and Northern Ireland who work for regional or local newspapers. The union has a Newspapers and Agencies Council that meets regularly, engaging with issues such as cuts to local journalism and democratic accountability.

The NUJ is affiliated to the Trades Union Congress (TUC) and is not affiliated to any political party.

Introduction

The National Union of Journalists (NUJ) represents approximately 1,000 members working across the BBC's Nations and Regions. Our response to this consultation is informed by our members' direct experience of recent changes to BBC Local Radio, particularly the significant reduction in truly local broadcast output.

While we acknowledge the BBC's rationale for seeking amendments to its Operating Licence, we urge Ofcom to adopt a cautious and evidence-based approach. Any approval should be conditional, subject to a thorough evaluation of the BBC's delivery of local radio services.

Background

In 2022, the BBC introduced its "Local Value For All" strategy, reallocating resources to expand digital services across England. This shift resulted in a substantial reduction in linear radio output, with genuinely local programming - which we define as content produced within the broadcast area of a single station - restricted to weekday hours between 06:00 and 14:00, and local sport coverage. The remainder of programming became regional or national in scope.

The BBC justified these changes by citing declining local radio listenership and projected future trends. However, while trade unions were consulted regarding job losses, there was no meaningful public consultation by either the BBC or Ofcom. This lack of engagement meant licence fee payers were not given the opportunity to voice their views on changes that directly affect their local services.

The impact of these cuts continues to be felt deeply by our members and the communities they serve. At the time of the announcement, BBC Local Radio in England had 5.7 million listeners. According to the latest RAJAR figures, this has fallen to 4.6 million. BBC management has suggested that audience figures have now “stabilised” and that RAJAR is “not the only measure of success.” Nonetheless, this decline underscores the need for careful scrutiny of any further changes.

Specific examples of local programming cuts

The following examples illustrate the scale and nature of the cuts to local programming:

- **Sunday afternoon programming:** Around 10 specialist music shows were axed in favour of a single national programme, *The Make a Difference Show*, which now airs across all BBC Local Radio stations from 2pm to 6pm on Sundays.
- **John Leech’s Soul Show**, which aired across BBC stations including Essex, Cambridgeshire, Suffolk, and Norfolk, was discontinued after 14 years.
- **Simon Logan’s 80s and 90s Show** on BBC Radio Newcastle and Tees was also removed, despite a strong listener base and a petition in support of the host.
- **Lisa Marrey’s Sunday Show**, broadcast across BBC Radio Lancashire, Merseyside, and Cumbria, was cancelled and replaced with the national programme.

These changes have led to widespread public dissatisfaction and a perceived erosion of local identity in BBC programming.

NUJ position

We recognise the logic behind the BBC’s request to amend the Operating Licence to allow all local programming - regardless of broadcast time - to count towards its local content obligations. This change would reflect the reality of current scheduling practices. That said, we do not agree with or understand Ofcom’s definition of “local” programming. It currently allows for programme sharing across large regions – some covering huge parts of the country. Although outside the scope of this consultation, we continue to be puzzled of how Ofcom can consider this to count towards “local” programming quotas.

We welcome the BBC’s commitment to maintaining the current number of BBC Introducing and Upload programmes. However, as referenced above, we note that these programmes, once station-specific, are now largely regionalised, reducing their local distinctiveness. We also welcome the prospect of new shows on Saturday mornings, though again, these will likely be regional rather than local. Furthermore, we note the BBC’s assurances that local news bulletins will remain as they are now – though we are concerned that any relaxation in the Operating Licence has the potential to lead to erosion of these services.

Despite these positive developments, we urge Ofcom to scrutinise the BBC's rationale for its licence amendment request. For instance, the BBC has stated its intention to invest more in areas with higher audience engagement. Yet, it recently replaced regional Sunday afternoon programmes with a single All England show, despite research indicating that the Sunday afternoon slot previously reached up to 700,000 listeners.

The BBC has argued that local sports coverage offsets the reduction in local programming. However, this appears insufficient to meet Ofcom's existing quota for original hours, hence the request for a licence change.

The proposed licence amendment means that all shared output, except "all England" programming, will now count as "locally-made".

If the amendment is approved, all stations will be able to achieve at least 104 hours per week of "original, locally-made programming" though a mix of their own local output and hours taken from "neighbouring stations". This is nine hours more than the 95 hour minimum quota. Therefore, the BBC could decide in future to replace nine hours of local output with programming taken from another station anywhere between the hours of 06:00 and 14:00 on weekdays, at still achieve its minimum quota, as there is no wording in the licence which explicitly protects these hours.

Recommendations

While this consultation does not directly address broader issues of local radio provision, we urge Ofcom to reaffirm its previous commitment to:

"Pay close attention to nations and regions provision and local radio – if our research shows that audience needs are not being met, we will consider whether to impose additional Licence conditions..."

To that end, we recommend that Ofcom:

- Clearly outlines how it monitors and evaluates local radio content.
- Establish a single clear, unambiguous definition for "original, locally-made programming". The licence should be amended so that "locally made" can only be used to describe programming made by a particular station and should not include any programming taken from another station at any time.
- Ensure the BBC makes a firm commitment to maintaining local news bulletins for each individual station area between 0600 and 1800 on weekdays and 0700 and 1300 on weekends.
- Amend the Operating Licence to also make clear whether programming repeated in the same week can count towards the quota.
- Consider imposing any additional Licence conditions where necessary.
- Commission a regulator-led audit of BBC Local Radio output. This audit should not be overly prescriptive but should assess whether the BBC is meeting its public service obligations at a local level.

Importantly, such an audit must not be perceived as a criticism of BBC staff, who continue to deliver high-quality content under increasingly challenging circumstances and with reduced resources.

Conclusion

The NUJ notes Ofcom's provisional support for the BBC's request to amend its Operating Licence and cautiously welcomes the BBC's assurance that current levels of local output will be maintained. However, we believe it is essential that Ofcom fulfils its regulatory duty by ensuring that the BBC's local content is not only quantitatively sufficient but also qualitatively robust.

Should Ofcom approve the BBC's request, we recommend that it be subject to time-limited conditions, during which a comprehensive audit and monitoring process is undertaken to confirm compliance and uphold the BBC's public service remit.