

DEMOS

FAIRER FEEDS

PUBLIC INTEREST NEWS,
PROMINENCE RULES, AND THE
FUTURE OF DISCOVERABILITY
ON PLATFORMS

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Sofia Lyall and Azzurra Moores

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ABOUT THIS REPORT

Demos is the UK's leading cross-party think tank producing research and policies that have been adopted by successive governments for more than 30 years. Our vision is for an upgraded democracy, to rebuild the broken relationships between institutions and citizens, and between citizens. To upgrade democracy, Demos calls for a New Deal between citizen and state – one which asks something of us all, delivers for all citizens and is built through collaboration. Resilient information ecosystems are a vital enabler of this more trusted democracy.

This is the latest paper in the *Epistemic Security* programme that focuses on securing information supply chains within the UK in order to build democratic resilience to adverse influences. In the context of democratic backsliding and rising extreme populism, the paper makes the case that this should be a central mission of this government. It explores pathways to improve citizen access to public interest news information and to safeguard media pluralism and independence in a platform environment by updating the UK's prominence frameworks.

As mis- and disinformation abound, increasingly undermining the healthy functioning of democracy, the recommendations focus on increasing the discoverability of public interest news sources on video-sharing platforms and social media feeds. This paper also outlines the overarching conditions of transparency and accountability needed to ensure that prominence rules are implemented effectively.

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EXECUTIVE SUMMARY

Citizen access to public interest news is fundamental for the functioning of a healthy democracy. When citizens have access to accurate and reliable information, they are empowered to develop informed opinions, participate in public life, critically interrogate false, misleading and inflammatory narratives, and pursue accountability for those in positions of power. Where mis- and disinformation thrives unchallenged, people's online and offline safety and security are compromised.

But in 2026, these basic civic needs are woefully under-served. In the digital age, large technology companies hold disproportionate influence over citizen access to information: platforms control content prioritisation processes in anti-democratic ways, public interest news sources struggle for discoverability, mis- and disinformation abounds, hate speech proliferates, and media organisations face dire financial consequences that threaten their long-term survival.

At the same time, the incentives of platforms and public service broadcasters are becoming increasingly misaligned: in a digital discovery marketplace driven by advertising, revenue-sharing and global commercial deals, public interest content is often treated as an opportunity cost rather than a civic good, leaving PSBs unable to compete for prominence on equal terms.

Much of the debate about how to tackle the worsening quality of the information environment has focused on challenging mis- and disinformation where it arises. There has been less focus on how to prioritise content on platforms to ensure that citizens can consistently access public interest information. Against this backdrop, this paper makes recommendations for increasing the discoverability of public interest news information by extending 'due prominence' and 'must carry' rules.

The paper offers two complimentary sets of recommendations to develop effective prominence regimes that increase citizen access to public interest news sources, while supporting media independence and pluralism.

The first focuses on new prominence requirements in two key areas of the contemporary media environment (video-sharing platforms and social media feeds) for two key providers of public interest news (public service broadcasters and news publishers meeting certain 'public interest' standards).

The second focuses on the overarching enablers for implementation and governance to ensure new prominence rules are implemented effectively and uphold democratic standards regardless of media context.

The call to update the UK's prominence requirements has received accelerating attention in recent years. In 2024, the House of Lords *Future of News* report called for platforms to give greater prominence to news publishers on social media feeds, while in 2025, Ofcom's *Transmission Critical* report called for the prominence of public service broadcasters on video-

sharing platforms. The Secretary of State for Culture, Media and Sport Lisa Nandy has also made clear that she would not shy away from legislative routes, saying: “If we need to regulate, we will.”

But despite this growing interest, action has been slow. This is due to the challenge of finding the right legislative and technical routes to achieving these changes and the controversy presented by the concept of prominence, including how to define what public interest news is, and who should decide this without compromising press freedom.

This paper charts pathways forwards which, taken together, will reset the relationship between citizens and trustworthy information to restore a basic civic need, strengthen media independence and pluralism, and ultimately better safeguard the UK’s democracy in the digital age.

RECOMMENDATIONS

1. NEW PROMINENCE REQUIREMENTS FOR PUBLIC INTEREST NEWS

(1a) Prominence for public service broadcasters (PSBs) on video-sharing platforms

Statutory prominence for PSB content of the highest civic value. The government should achieve this by creating new rules for video-sharing platforms. Ofcom guidance should also encourage PSBs to prioritise their content serving the highest civic value, especially news and children’s content.

(1b) Discoverability of public interest news sources on social media platforms

Algorithmic prominence for ‘public interest’ news sources. New legislation should require platforms to give prominence to ‘public interest’ news sources through a parameter-based approach to support media plurality. Parameters should be based on standards for trustworthy editorial workflows, procedural fairness, and transparency. They should be governed by an independent, co-regulatory body and defined in collaboration with citizens.

(1c) Financial sustainability for the UK’s public interest media content

5% levy on video-sharing platforms for a UK Public Interest Content Fund. The government should require platforms to give 5% of their annual UK revenue to a Public Interest Content Fund for UK-produced audiovisual content which would provide independent grant-funding to diverse UK media creators. Similar levy-based cultural funding models already operate in jurisdictions including Canada and France, demonstrating clear international precedent for this approach.

2. ENABLERS FOR DEMOCRATIC & ACCOUNTABLE GOVERNANCE OF NEW PROMINENCE RULES

(2a) Co-regulatory governance and oversight mechanisms.

The government should enable the establishment of an independent, co-regulatory body to oversee the UK's prominence regime. Co-regulation is a form of collaborative governance that enables the involvement of external actors in the regulatory process. This is particularly important for providing democratic underpinning to prominence frameworks because it would facilitate oversight and regulatory mechanisms that are independent from government, and therefore safeguard against charges of disproportionate government control. The body would oversee selection processes for determining what content is deemed of 'public interest', reviewing these decisions at regular intervals, and disclose public reporting on outcomes of the UK's prominence regime.

(2b) Appeals processes for contesting prioritisation outcomes.

The government must ensure that prominence rules are accompanied by robust appeals opportunities for media organisations and the public to contest content prioritisation decisions on platforms. In the first instance, the government should ensure that 'temporary must-carry' provisions for news publishers under the Online Safety Act undergo adequate implementation.

(2c) Algorithmic transparency and platform data access.

The government must broaden transparency and data access requirements on platforms to enable scrutiny of content prioritisation processes as a minimum first step on the UK's updated prominence regime. This should include: public disclosure of recommender system parameters; access for news publishers to core platform insights on content flows; and access to recommender system APIs for news publishers.

2(d) Public awareness and opinion research to inform implementation

The government must conduct public research to inform the design of the launch of an enhanced prominence regime to ensure sufficient awareness of its benefits for citizens. This will be crucial to avoid risks of public backlash.

INTRODUCTION

CONTEXT

Over the last two decades, the information environment has undergone a profound transformation. Where audiences once relied primarily on television, radio, and print to access news and information, the rise of the internet has dramatically expanded both the range and immediacy of available sources. In addition to traditional channels, people now navigate a complex ecosystem that includes social media platforms, search engines and aggregators, digital news outlets, podcasts, and AI chatbots.

The UK's epistemic security, the safety and resilience of the information our democracy depends on, has undergone an intense transformation.¹ These changes have brought with them, and in many cases amplified, a range of democratic challenges: from intensified misinformation and disinformation, to proliferating hate speech and other harmful online content, to reduced web traffic and visibility of news, to a range of financial challenges for traditional media sources and creative producers.

In response, the government is tasked with the challenge of designing law and policy solutions that protect the UK's media environment in a constantly-evolving platform-dominated landscape. The scale of this challenge should not be under-estimated – it would be a difficult brief for any government. But for the current administration, the challenge of strengthening the information environment is made all the more delicate – and yet no less critical – amidst widening polarisation, increasing sensitivity and public scrutiny on which voices are afforded greater media airtime, and increasing geopolitical entanglement with the US administration and trade talks. Any move requires dedication to a clear-sighted goal and a meticulous and thoughtful navigation of the risks.

WHAT ARE 'PROMINENCE' OR 'MUST CARRY' RULES?

Extending and updating existing 'prominence,' or 'must-carry' rules, is a potential avenue for addressing some of these visibility and discoverability challenges for trusted news sources – whether by helping to deprioritise mis- and disinformation, increase citizen access to information deemed of public interest, or by offering additional revenue to partially relieve the financial pressures facing media organisations and therefore supporting the supply of trusted information.

In broad terms, prominence regimes create obligations to enhance the visibility of public interest information across a range of media environments - from television and radio to digital platforms. These regimes are rooted in earlier 'must-carry' legislation, which established requirements for broadcast and radio providers to carry specific channels.

¹ Seger, E., Perry, H. and Hancock, J. (2025). Epistemic Security 2029. Fortifying the UK's Information Supply Chain to Tackle the Democratic Emergency. Demos. https://demos.co.uk/wp-content/uploads/2025/02/Epistemic-Security-2029_accessible.pdf

PROMINENCE RULES IN 2026: CHARTING A PATH FORWARD

In recent years, media policy experts have increasingly focussed on whether, and how, existing prominence rules should be updated to reflect technological change of the media ecosystem. In the UK, these debates have been especially shaped by three developments: the adoption of the Media Act (2024), which extends original must-carry rules to connected TVs and smart radios;² the House of Lords' *Future of News report* (2024), which calls for greater prominence of news on social media platforms;³ and Ofcom's *Transmission Critical* report (2025), which advocates for the prominence of public service broadcasting news and children's content on video-sharing platforms such as YouTube.⁴

Despite increased attention in recent years, there remain many disagreements and potential points for controversy. How can prominence rules be extended to media devices that are increasingly prevalent for audiences' news consumption, such as video-sharing platforms, and social media feeds? In an increasingly converging media environment, what content should be considered of public interest, and therefore worthy of prioritisation? What conditions of transparency, accountability, and fair compensation are needed to guarantee democratic legitimacy? This paper seeks to address some of these uncertainties.

The government should pursue a more proactive approach to updating the UK's prominence rules – as a logical next step for restoring democratic resilience for the information ecosystem in the digital age. At a time when the public interest media industry is under intense financial strain amid growing struggles for online visibility, small measures will not suffice – decisive action is required from those in power to strengthen the democratic resilience of the contemporary information ecosystem. These questions will only become more pressing as AI products become increasingly favoured among users' information search and retrieval methods – though the scope of this paper only partially tackles prominence in the context of AI products, and therefore more in-depth thought is needed.

The first section of this paper provides a conceptual overview of prominence, outlining definitions and democratic benefits and risks of updating prominence frameworks. The second section explores UK policy opportunities, with a particular focus on two key areas: prominence for PSBs on video-sharing platforms, and public interest news prominence on social media platforms. The Appendix provides comparative case studies of prominence frameworks across international jurisdictions, charting whether and how they have been updated for the digital age.

The paper is based on desk research, global comparative policy analysis, interviews with diverse media experts across government, media industry, tech industry, civil society and academia, and a Demos-hosted roundtable focused on news prominence on social media.

Extending the UK's prominence rules is just one step towards strengthening epistemic security and “no silver bullet” for addressing the challenges facing the contemporary media environment.⁵ To truly address the myriad of structural vulnerabilities and threats to our continually evolving information supply chains, upgrades to our prominence regime must be complemented by a broader cross-government epistemic security strategy that enables a range of legal and policy interventions that reflect a cohesive and balanced reform agenda.

2 UK Government. (2024). Media Act 2024. <https://www.legislation.gov.uk/ukpga/2024/15/contents>

3 House of Lords Communications and Digital Committee. (2024). The Future of News. <https://lordslibrary.parliament.uk/the-future-of-news-report-by-the-house-of-lords-communications-and-digital-committee/>

4 Ofcom. (2025). Transmission Critical. The Future of Public Service Media. <https://www.ofcom.org.uk/siteassets/resources/documents/public-service-broadcasting/public-service-media-review/transmission-critical-the-future-of-public-service-media.pdf?v=400631>

5 Ofcom. (2025). Transmission Critical. The Future of Public Service Media. <https://www.ofcom.org.uk/siteassets/resources/documents/public-service-broadcasting/public-service-media-review/transmission-critical-the-future-of-public-service-media.pdf?v=400631>

1. WHY PURSUE A PROMINENCE AGENDA?

This section introduces the concept of prominence by providing overarching definitional concepts and explains the democratic benefits of prominence regimes, before turning to the risks and limitations of updating prominence rules for the contemporary media environment.

1.1 WHAT IS 'PROMINENCE'?

Prominence rules refer to regulatory frameworks designed to enhance the visibility, discoverability, or “prominence” of certain types of content considered to be of public interest. As defined by the Council of Europe in its *Guidance Note on the Prioritisation of Public Interest Content Online* (2021):

“A prominence regime is the prevailing framework of rules which establishes to what extent platforms and intermediaries can, or should prioritise certain forms of content over others, and under what conditions of transparency, accountability, and liability.”⁶

In the UK, such rules have long underpinned the prominence of public service broadcasting. On traditional linear television, they ensure that public service broadcasters occupy the most accessible positions, most notably channels 1–5, so that viewers across the country can reliably access services such as BBC News at 10pm simply by selecting the first channel.⁷

When prominence rules were first introduced in the 1960s, the media landscape looked significantly different to how it looks now. It was dominated by broadcast television and radio, both of which were linear – meaning content was scheduled on specific channels at fixed times. In a digital age, however, the media and information landscape has undergone profound technological transformation, vastly expanding and diversifying how audiences engage with content: how it is accessed, when it is consumed, and through which platforms. The question of how to extend existing prominence rules for the digital age is gaining increasing attention. If prominence rules are to be updated beyond their traditional scope, two foundational questions arise: which devices or platforms should be subject to prominence requirements, and what types of media content should qualify for prominence?

⁶ Council of Europe. (2021). *Guidance Note on the Prioritisation of Public Interest Content Online*. Strasbourg: Council of Europe. <https://rm.coe.int/guidance-note-on-the-prioritisation-of-public-interest-content/1680a2dd5d>

⁷ Ofcom’s Code of Practice on Electronic Programme Guides outlines that the first five channel slots on linear broadcast television are reserved for PSBs. <https://www.ofcom.org.uk/tv-radio-and-on-demand/broadcast-standards/epg-code>

1.1.1 Which devices or platforms should be subject to prominence requirements?

Current discussions around prominence are increasingly focused on how existing frameworks might be extended beyond hardware to include software environments as well.

In relation to **hardware**, potential categories for updating prominence rules include:

- **Broadcast television**
- **Internet Television Equipment (ITE)**
 - Smart TVs
 - Streaming sticks and boxes (eg. *Amazon Fire TV, Apple TV, Roku* etc)
- **Remote controls** (eg. TV remote)
- **Broadcast radio**
- **Smart speakers / radios**
- **Mobile phones**
- **Laptops/computers**
- **In-car media devices**



In terms of **software or platform media**, options available for updating prominence rules may include:

- **Video platforms**
 - Video-sharing platforms (eg. YouTube, Tiktok, Vimeo, Dailymotion)
 - Major streaming services (eg. Netflix, Amazon Prime Video, Disney+)
- **Search services** (eg. Google Search, Bing, Yahoo, DuckDuckGo)
- **Generative AI products** (eg. Google AI Overview, ChatGPT, Claude)
- **Social media platforms** (eg. Facebook, X, Instagram)
- **Audio streaming platforms** (eg. Spotify, SoundCloud)



The ways in which prominence is achieved across these different devices and platforms are also varied. It may be embedded in physical features, such as dedicated buttons for specific content providers on television remotes; expressed through user interfaces, including home-screen layouts and visual cues such as filters, icons, tiles, or content rows; or generated algorithmically, whereby recommender systems, search rankings, or large language model-based tools are designed to shape and elevate the visibility of particular types of information.

1.1.2 What types of media content should qualify for prominence?

The question of what should be given prominence presents a range of definitional complexities surrounding how “public interest” content is identified, as well as who has the authority to make such decisions. If the processes around these decisions are not adequately safeguarded, there are significant risks that a single actor may exercise disproportionate control over the information the public has access to. The following section explores these risks and potential for controversy in greater depth.

The paper charts multiple pathways for determining public interest content to give prominence to. The first makes recommendations for greater prominence for public service broadcasters, who hold public interest obligations as part of their licence. The second makes recommendations for increasing the discoverability for news publishers who meet certain criteria for public interest news.

1.2 WHY PROMINENCE? DEMOCRATIC BENEFITS OF UPDATED PROMINENCE RULES

Updates to prominence rules in the platform environment have been proposed as a solution to two broad contemporary issues. First, to improve citizens’ access to information, and the ensuing democratic benefits in terms of civic engagement, and resilience against mis- and disinformation. Second, and a benefit favoured by media industry actors, for resolving the growing financial threats faced by media and journalism.

The overarching goals for updating prominence rules will dictate the nature of the policies that are designed: prominence rules that provide citizens with greater access to public interest information will differ in detail from those designed to bring financial benefit to media organisations. As such, alignment on what problem the prominence regime should solve from the design stage is critical to its ultimate success. Without clarity on the overarching goal, prominence rules will risk becoming incoherent, overly complex, and laden with risks. Both benefits are critical, mutually beneficial and impossible to weigh against one another, but we expand on why, at Demos, we believe citizens’ access to public interest information should be the guiding priority for the design of upgrades to the prominence regime.

As Benjamin Sabbah, the Director of the Journalism Trust Initiative (JTI), states:

“It is time to act. Due prominence represents a proportionate and pragmatic response. It protects citizens in their right to access reliable information that enables them to exercise self-determination and make individual and collective choices in a democracy, whilst preserving the diversity of the media landscape.

The question is no longer whether this measure risks penalising reliable media outlets. They are already being penalised. The question is: how can it be implemented as swiftly and effectively as possible so that it benefits the greatest number of news media outlets in terms of visibility and therefore of the potential to monetise their news content, regardless of their technological and human investment capacity to maintain their presence on search engines and social media platforms.”⁸

8 Sabbah, B. (2026) Statement by the Director of the Journalism Trust Initiative, 6 May.

1.2.1 Improving citizen access to public interest news information

Access to information is foundational to a functioning democracy. The increased visibility of trusted news sources on platforms will have resounding democratic benefits. At Demos, we believe citizen access to trustworthy information must be the government's first and foremost priority for updating prominence rules in order to upgrade the quality of our democracy and facilitate political equality for citizens. Access to trustworthy information enriches citizens' experience of democracy in three powerful ways:

Firstly, citizens must be able to access high-quality information to **effectively and fully participate in democracy**. When more citizens have access to accurate and reliable information, then a higher proportion are able to develop informed opinions, engage in public discussion and discuss matters of common concern on an equitable footing. This is particularly important in relation to political information as it enables citizens to critically evaluate government policymaking, to deliberate with one another and make informed choices during election periods regardless as to their background.

Secondly, access to information is vital for empowering citizens to **pursue accountability** for people in positions of power effectively, regardless of their proximity or political capital. Information about the activities of those in positions of authority enables public scrutiny and allows citizens to evaluate their alignment with public interest, rule of law, and democratic standards. By providing greater access and visibility of such information, the government can enable greater transparency and ultimately build and strengthen trust between citizens and state. Crucially, it ensures the public has the information needed to pursue concrete routes for redress. Without information, accountability is impossible.

Thirdly, citizen access to trusted and reliable information provides **resilience against mis- and disinformation**. It empowers citizens to compare different information sources on the same story, verify false claims, and develop foundational media literacy skills needed to recognise unreliable or manipulative content. Too often the focus of tackling mis/disinformation remains on removing or debunking poor quality information. By ensuring the prominence of good quality information, citizens are better equipped with the baseline tools they need to make their own judgments in a complex information environment. Establishing societal resilience against mis- and dis is also critical for ensuring people's safety and security. The 2024 Southport riots have shown that mis- and disinformation can cause offline violence as well as online harms – when far-right rioters, fuelled in part by false claims on social media, attacked mosques and hotels housing asylum seekers across the UK.⁹

In this contemporary media environment, in which citizens increasingly consume news through platforms, citizen access to public interest news information is under threat, with serious implications for an impoverished experience of democracy for too many citizens and weakened overall democratic resilience as a result. Changing media consumption habits mean that most people now access their news from platforms – rather than linear broadcast TV, radio or print media. The 2025 Reuters Institute Digital News report found that in the UK over the past 12 years, news audiences for TV have fallen from 79% to 48% and from 59% to 12% for print media. This has resulted in an online-led, mobile-first UK news landscape. 20% of UK adults now say that social media is their main source of news, with this percentage increasing for younger generations. The UK is not alone in this trend. Globally, 44% of 18-24 year olds and 28% of 25-34 year olds say that social media is their main source of news.¹⁰ This evidence suggests that the focus for visibility of trustworthy information needs to move to where people are: social media and video-based platforms.

⁹ Science, Innovation and Technology Committee. (2025). Social media, misinformation and harmful algorithms (2nd Report, HC 441). House of Commons. <https://publications.parliament.uk/pa/cm5901/cmselect/cmsctech/441/report.html>

¹⁰ Newman, N. (2025). Overview and key findings of the 2025 Digital News Report. Reuters Institute for the Study of Journalism. Reuters Institute, University of Oxford. <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2025/dnr-executive-summary>.

Increasingly, trusted news sources that reliably provide accurate information are struggling for relevance and visibility in these new spaces while unverified or misleading information increasingly receives the greater engagement. For example, public service broadcasters are finding that audiences are increasingly moving away from their channels in favour of viewing content on video-based platforms. January 2026 marked a historic turning point as YouTube overtook the BBC on audience reach, upending the natural order of UK television. Barb figures on monthly audience showed that YouTube had a reach of 51.9M viewers in December 2025, more than a million ahead of the BBC's equivalent figure of 50.8M.¹¹ With the BBC being the most-watched broadcaster among UK audiences, this means that YouTube surpassed all the UK's public service broadcasters.

Public interest news publishers are also struggling for visibility on online platforms. Media organisations have experienced a sharp and sustained decline in referral traffic from platforms in recent years. Between 2018 and 2023, Facebook referral traffic to news publishers fell by between 40% to 55%, while from 2022-23, referrals from X declined by 20% to 48% depending on the news publishers. The figures for web referrals from search rankings show equally sharp declines. Globally, between 2024 and 25, Google search traffic to publishers reportedly fell by a third.¹² In 2025, Google carried out a major update on its search algorithm, which resulted in lower visibility in search rankings for 42 out of 74 UK news publishers, analysed by Press Gazette.¹³ The emergence of AI-powered search products has further intensified these pressures. AI-powered summaries and search experiences through products such as ChatGPT, Claude and Google's AI Overviews reduce incentives for users to click through to original reporting, as information is increasingly synthesised directly within the search interface. One study found that AI summaries caused 80% fewer clickthroughs for some of the UK's largest news publishers,¹⁴ with publishers saying they expect search traffic to fall by more than 40% in the next three years.¹⁵ Owen Meredith, the former chief executive of the News Media Association, said that Google was trying to keep users "within its own walled garden, taking and monetising valuable content – including news – created by the hard work of others".¹⁶

11 Goldbart, M. (2026). YouTube beating BBC in Barb viewing ratings. Deadline. <https://deadline.com/2026/01/youtube-beating-bbc-barb-viewing-ratings-1236680843/>

12 Reuters Institute for the Study of Journalism. (2026). News Publishers Expect Search Traffic to Fall More Than 40% in Next Three Years, New RISJ Report Finds. University of Oxford. <https://www.politics.ox.ac.uk/news/news-publishers-expect-search-traffic-fall-more-40-next-three-years-new-risj-report-finds>

13 Tobitt, C. (2025). Most Leading UK News Websites Fell Down Google Rankings in 2025. Press Gazette. <https://pressgazette.co.uk/media-audience-and-business-data/most-leading-uk-news-websites-fell-down-google-rankings-in-2025/>

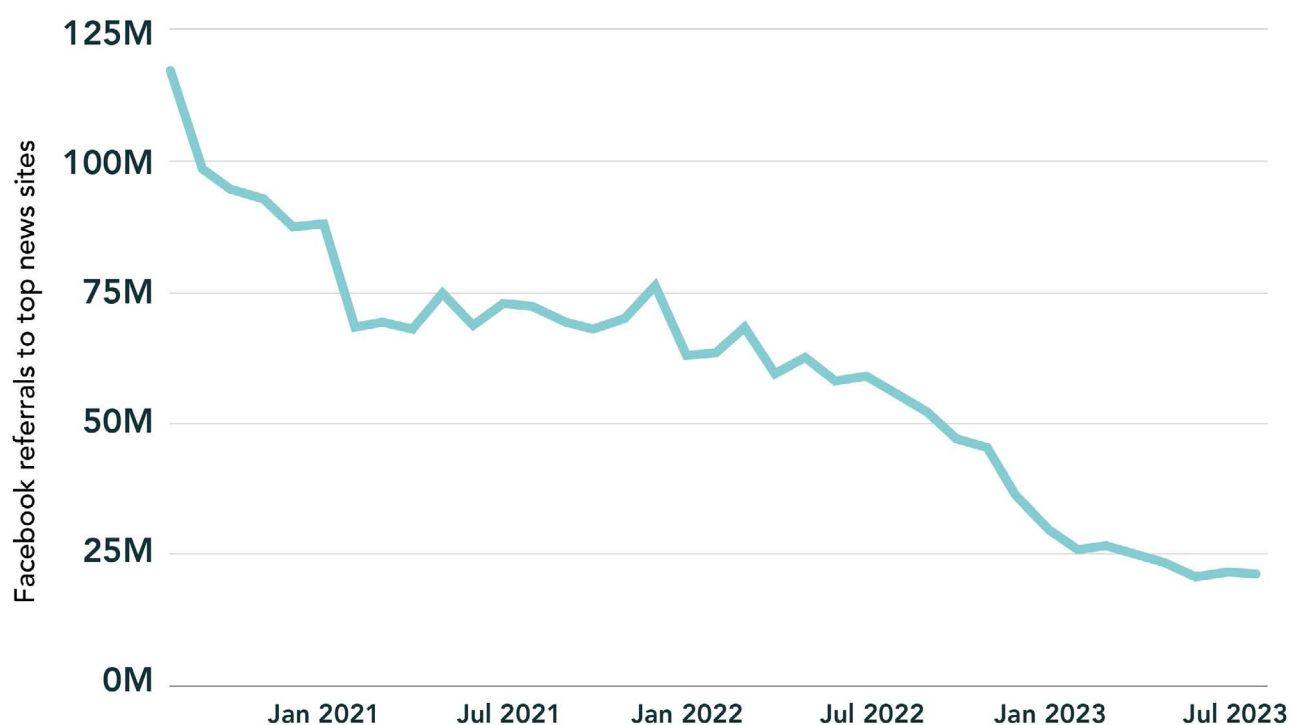
14 Savage, M. (2025). AI Summaries Cause 'Devastating' Drop in Online News Audiences, Study Finds. The Guardian. <https://www.theguardian.com/technology/2025/jul/24/ai-summaries-causing-devastating-drop-in-online-news-audiences-study-finds>

15 Reuters Institute for the Study of Journalism. (2026). News Publishers Expect Search Traffic to Fall More Than 40% in Next Three Years, New RISJ Report Finds. University of Oxford. <https://www.politics.ox.ac.uk/news/news-publishers-expect-search-traffic-fall-more-40-next-three-years-new-risj-report-finds>

16 Savage, M. (2025). AI Summaries Cause 'Devastating' Drop in Online News Audiences, Study Finds. The Guardian. <https://www.theguardian.com/technology/2025/jul/24/ai-summaries-causing-devastating-drop-in-online-news-audiences-study-finds>

CHART 1

FACEBOOK REFERRALS TO TOP NEWS SITES, 2021-2023



Source: Digiday. <https://digiday.com/media/publishers-reckon-with-declining-facebook-referral-traffic-as-the-platform-pulls-away-from-news/>

At the same time, there is large consensus that unverified and unreliable information sources now consistently receive high audience engagement. Demos has dedicated significant attention to the proliferation of mis- and disinformation online. For example, our 'Driving Disinformation' report found that disinformation on Low Traffic Neighbourhoods rose from 5% in 2022 to 28% in 2023.¹⁷ Additionally, our 'Community Disorder' examined the proliferation of false and harmful information on social media following the 2024 racist riots that erupted in Southport, and found that a post 'confirming' that the attacker was Muslim had 1.5 million views and another 'confirming' that the attacker was an illegal immigrant who had arrived in the UK on a boat had 1.3 million views.¹⁸

It's important to note that changing news consumption habits can bring benefits for citizen's ability to access public interest news information. The distribution and consumption of news via online platforms can offer citizens greater access to more diverse media sources, and the digital innovation of new journalistic reporting approaches may have greater resonance with people and improve civic engagement. In some regards, the emergence of the creator economy has allowed independent public interest news pages to more easily enter the market and establish considerable audience following and influence that previously was restricted to legacy media. However, the overall balance and visibility of trustworthy information relative to poorer quality sources within these spaces remains a key concern.

¹⁷ Perry, H. et al. (2024). Driving Disinformation: Democratic deficits, disinformation and low traffic neighbourhoods - a portrait of policy failure. Demos. <https://demos.co.uk/research/driving-disinformation-democratic-deficits-disinformation-and-low-traffic-neighbourhoods-a-portrait-of-policy-failure/>

¹⁸ Ibid.

To safeguard citizen access to public interest news information in a platform environment, updated prominence frameworks are a key opportunity. The current regulatory conditions are inadequate for ensuring that public interest news information reliably and consistently reaches citizens in line with changing news consumption habits. By updating the devices and platforms that the UK's existing prominence rules apply to, citizens could more easily access and discover diverse sources of good-quality news information – subject to robust fact-checking, 'public interest' standards, and editorial guidelines.

In turn, updated prominence rules could mitigate the impacts of mis- and disinformation and proliferating hate speech on online platforms by offering a valuable antidote to factually incorrect or sensationalist media. In a period of democratic backsliding and public dissatisfaction, prominence rules are a key policy mechanism for improving citizens' experience of democracy and ultimately increasing the resilience of our democracy to threats and vulnerabilities within our information ecosystem overall. If introduced effectively, prominence rules could support media independence and pluralism, and safeguard citizen access to public interest information to empower them to develop informed opinions, participate in democratic processes, and pursue public accountability – all of which are critical elements of a functioning democracy.

1.2.2 Supporting the financial sustainability of media organisations

From a media industry perspective, support for updating prominence rules in a platform environment is closely linked to their need to increase revenue and strengthen their financial sustainability as media organisations. Increased discoverability and visibility can translate into commercial gains through advertising or subscriptions.

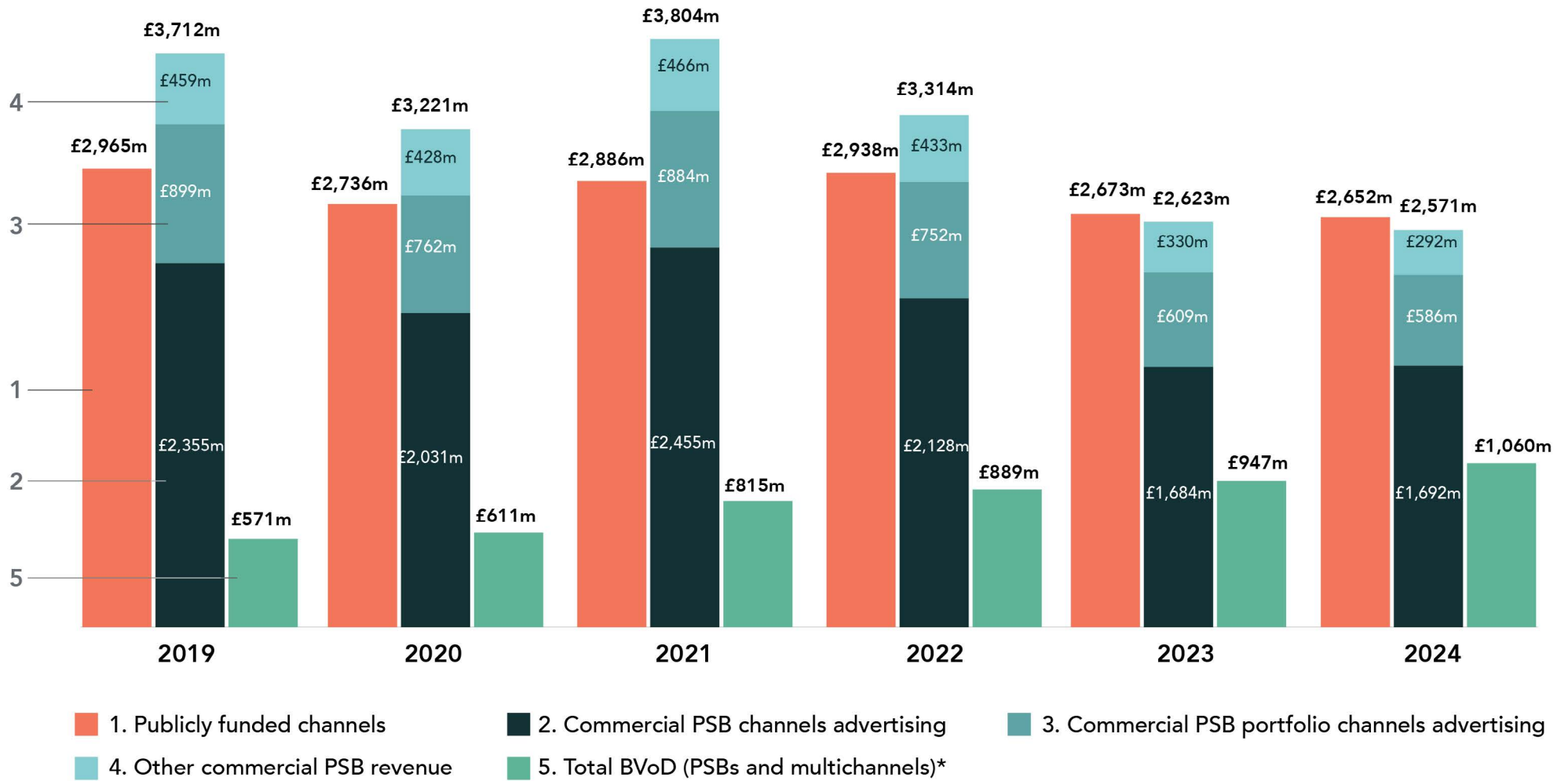
Media organisations are facing financial pressure that, in many cases, threaten their long-term viability due to declining advertising. These losses are felt across a wide range of organisations, from broadcasters to publishers, and from national outlets to local providers, spanning both publicly funded and commercial models. A key driver of these pressures is the emergence of the platform economy, which has fundamentally altered patterns of audience referral, reducing traffic to media organisations' websites and channels and, in turn, eroding digital advertising income.

For commercial public service broadcasters such as ITV and Channel 4, the impact has been particularly acute. Television advertising revenue has fallen by close to £1 billion (around 30%) since 2019, and by approximately £1.5bn (39%) since 2014.¹⁹ Given that commercial PSBs have traditionally depended heavily on advertising sales as their primary source of income, this sharp decline has created significant existential challenges for their operating models.²⁰

¹⁹ Ibid.

²⁰ Ofcom. (2025). Transmission Critical: The Future of Public Service Media. <https://www.ofcom.org.uk/siteassets/resources/documents/public-service-broadcasting/public-service-media-review/transmission-critical-the-future-of-public-service-media.pdf?v=400631>

CHART 2
PSB TV REVENUES, 2019-2024



Source: Ofcom

Despite steadily declining revenues, costs for PSBs are rising sharply. To maintain relevance among audiences, PSBs now have to compete with the enormous production budgets of global online players such as Netflix and Amazon.²¹ Netflix's UK content budget for 2025 was estimated at \$18 billion, while the BBC's content spend across TV, radio and online was just 2.69bn – less than a sixth of Netflix's.^{22,23} In an age of platforms, PSBs require extortionately higher budgets to compete for audience relevance, and yet they are facing significant declines in advertising revenue.

The picture is similarly challenging for news publishers. Historically, newspapers generated up to 80% of their revenue from advertising, whether print or digital, although this figure varies from market to market.²⁴ But it is now estimated that just 38% of global revenue for news publishers came from advertising – less than half of what it used to be.²⁵ At the same time, subscription models face clear limits, with 83% of users reported to move on when they encounter a paywall, leaving news organisations under pressure on multiple fronts and struggling to secure sustainable revenue streams.²⁶ This global trend is playing out starkly for UK publishers. It has become increasingly common for news publishers to experience year-on-year declines in advertising revenue of around 12–14%. For instance, the Guardian Media Group reported a 13% drop in 2023-24,²⁷ the Daily Mail and General Trust reported a 15% decline for 2024-25,²⁸ and Reach PLC reported a 12.5% decline in early 2025.²⁹ These declines in advertising revenue are largely driven by reduced visibility on online platforms – the figures for which are cited above – whereby lower search rankings, weaker social media presence, and limited AI citation reduce traffic and, in turn, monetisable engagement through advertising and subscriptions.

In response, media organisations have had to dedicate significant resources to optimising their visibility across search and social media. Many newsrooms now include teams focussed on audience engagement and search engine optimisation (SEO), in order to enhance the visibility using data-driven strategies such as keyword research or audience intent mapping. With the rise of AI search products, digital market specialists have now begun to speak of 'Generative Engine Optimisation', or methods for innovating online strategies to help organisations survive in an age of AI-powered search engines.^{30,31}

Because of significant financial challenges, in part caused by declining ad revenue, many UK public interest media organisations have been forced to make redundancies or close down entirely. More than 3,000 jobs were cut in the journalism sector across the United Kingdom and the United States in 2025,³² while permanent contracts for UK journalists fell from 74% in

21 Sweney, M. (2025). We Have to Reset: Britain's TV Industry Struggling in Big-Budget Streaming Era. The Guardian. <https://www.theguardian.com/media/2025/feb/07/we-have-to-reset-britains-tv-industry-struggling-in-big-budget-streaming-era>

22 Spangler, T. (2025). Netflix Content Spending, Set to Hit \$18 Billion in 2025, Is 'Not Anywhere Near a Ceiling,' CFO Says. Variety. <https://variety.com/2025/digital/news/netflix-content-spending-2025-ceiling-cfo-1236328510/>

23 Kahn, E. (2025). UK's BBC to Cut £150m from Content Spend. Broadcast. <https://www.broadcastnow.co.uk/broadcast-international/uks-bbc-to-cut-150m-from-content-spend/5203560.a>

24 World Association of Newspapers and News Publishers (WAN-IFRA). (2015). World Press Trends: 'Audiences have become publishers' biggest source of revenue. Paris: WAN-IFRA. <https://wan-ifra.org/2015/06/world-press-trends-audiences-have-become-publishers-biggest-source-of-revenue/>

25 World Association of Newspapers and News Publishers (WAN-IFRA). (2026). World Press Trends Outlook: Rising 'Three-Pillar' Revenue Model Fuels Industry Optimism. Paris: WAN-IFRA. <https://wan-ifra.org/2026/01/world-press-trends-outlook-rising-three-pillar-revenue-model-fuels-industry-optimism/>

26 Alpert, L.I. (2025). Here's how many people leave a news article when asked to pay. MarketWatch. <https://www.marketwatch.com/story/few-people-are-willing-to-pay-for-news-online-which-makes-things-tougher-for-the-news-industry-332a8245>

27 Media Leader. (2026). Guardian Ad Revenue Plunges as It Plans Observer Sale. <https://uk.themedialeader.com/guardian-ad-revenue-plunges-as-it-plans-observer-sale/>

28 Brooker, A. (2026). The UK's biggest news media companies: New top 50 ranking by revenue. Press Gazette. https://pressgazette.co.uk/media_business/top-50-uk-news-media-companies-2026-ranking/

29 Kay, W. (2026). Should You Invest in Reach Right Now? The Times (London). <https://www.thetimes.com/business/companies-markets/article/should-you-invest-in-reach-right-now-npzw8xqb>.

30 Chen, M., Wang, X., Chen, K. and Koudas, N. (2025). Generative Engine Optimization: How to Dominate AI Search. arXiv preprint. <https://arxiv.org/abs/2509.08919>

31 Binder, A. (2025). Generative Engine Optimization (GEO): The Future of Search Is Here," Forbes. <https://www.forbes.com/councils/forbesagencycouncil/2025/01/02/generative-engine-optimization-geo-the-future-of-search-is-here/>

32 Karaduman, E. (2026, January 18). More than 3,000 journalism job cuts recorded in the UK and the US in 2025. International Journalists. <https://internationaljournalists.org/more-than-3000-journalism-job-cuts-recorded-in-the-uk-and-the-us-in-2025/amp/>

2015 to 65% in 2023 which suggests fewer stable, long-term journalist roles.^{33,34} It is widely recognised that the UK's local journalism has been on the sharpest receiving end of declining visibility: since 2005, approximately 300 local newspapers have ceased publication, and two-thirds of regional journalists have lost their jobs.³⁵ Today, 37 local authorities across the UK qualify as 'news deserts', impacting 4.4 million people, and in the last year alone, 22 local news outlets have been forced to close.³⁶

Against this backdrop, prominence or must-carry laws could be used to set standardised rules on the visibility and discoverability of media content on platforms. They could be used to ensure more consistent audience engagement and clickthroughs to media organisations from search, social media feeds, or AI products, and thereby reducing the risk of sudden or sharp plummets in web referral, which, in turn, could result in more reliable advertising revenue to provide commercial uplift for media organisations across the industry.

1.3 RISKS AND LIMITATIONS OF PROMINENCE REGIMES

Introducing new rules of prominence is not without risk and would attract significant controversy. Expanding prominence rules to a platform environment carries democratic risks if not introduced with adequate safeguards. During interviews for this paper, we heard concerns from diverse experts from tech, media, academia, and civil society that such rules could enable disproportionate influence over the media and information environment from government or commercial actors. As Courtney Radsch, the Director of the Center for Journalism and Liberty at the Open Markets Institute, summarises:

"The biggest challenges and simultaneously greatest risks are the decisions about what content is to be carried — regarding the criteria to establish which content constitutes public interest news, regarding who makes such decisions and what is the process for them.

Such determinations can easily become politicized and/or captured by those in power or special interests. Even if done in good faith, it needs to be considered that any interference in market dynamics by giving statutory prominence to certain news and not others, e.g. only to public service media, can impact the availability and accessibility of public interest information more broadly."³⁷

The democratic benefits of updating prominence rules for the platform environment are contingent on the introduction of robust guardrails that protect the public's access to high-quality information.

33 Nel, F. (2025, April 23). The employment conditions of UK journalists (in UK journalists in the 2020s). Reuters Institute for the Study of Journalism. <https://reutersinstitute.politics.ox.ac.uk/uk-journalists-2020s/2-employment-conditions-uk-journalists>

34 Sweney, M. (2026). BBC News to Bear Deepest Cuts Amid 2,000 Planned Job Losses. The Guardian. <https://www.theguardian.com/media/2026/may/02/bbc-news-to-bear-deepest-cuts-amid-2000-planned-job-losses>.

35 Armstrong, S. (2025). No News Is Bad News When It Comes to Local Journalism. The Observer. <https://observer.co.uk/news/the-sensemaker/article/no-news-is-bad-news-when-it-comes-to-local-journalism>

36 Public Interest News Foundation. (2025). Local News Launches, Closures and the State of Play in 2025. <https://www.publicinterestnews.org.uk/blog/local-news-launches-closures-and-the-state-of-play-in-2025/>

37 Radsch, C. and Schiffrin, A. (2025). Exploring must-carry for news in the platform economy. OSCE. https://rfom.osce.org/sites/default/files/f/ documents/1/2/597645_0.pdf

1.3.1 State and commercial capture of content prioritisation processes

Enacted without the appropriate safeguards, there is a risk that a prominence regime acts as state-mandated rules for what information users see online. These risks may lead to controversy around updated prominence rules because of the risks to press freedom if they are not implemented with adequate safeguards and enabling guardrails.

Prominence rules, in the hands of anti-democratic governments, can be used to push certain channels or make decisions about audiences' access to information, at its worst effectively resulting in state propaganda. A Council of Europe research report on the risks of ineffective prominence rules media independence and media plurality sets out:

“Controlling media outlets and using them as a propaganda tool is as old as the history of media; thus, as boundaries between media and digital intermediary services increasingly blur, controlling the latter through regulatory intervention could also lead to a soft form of propaganda. Such interventions could be used to impose prominence to only approved forms of discourses and approved channels while moderating away others.”³⁸

These concerns were emphasised throughout interviews with stakeholders from diverse media organisations, civil society, academia, and tech. One interviewee stated: “If discoverability is materially reduced for publishers that do not meet a prescribed definition, the state is effectively deciding which parts of the press are easier to find. That would represent a significant departure from the UK’s long-standing arms-length approach to press regulation.”³⁹ This argument was corroborated by experts from the tech industry who said that prominence rules would give the government the power to choose who wins and loses on online platforms, or as articulated in a recent blog on prominence from YouTube: “These rules could force YouTube to give special treatment to a small group of organisations hand-picked by a government” who then plays a “gatekeeper” role”.⁴⁰

As such, the government must pay careful consideration to these risks of state-captured content prioritisation processes, and ensure effective safeguards are introduced to mitigate risks, and uphold media plurality, independence and cultural diversity. China’s prominence regime is a prime example where an authoritarian government has used such interventions to amplify approved forms of state-back discourse on online platforms. In 2021, China introduced the ‘Provisions on the Management of Algorithmic Recommendations in Internet Information Services’ which requires algorithmic recommendation systems to give prominence to media sources backed by the Chinese Communist Party.⁴¹ The Provisions require recommendation systems to “actively transmit positive energy” which, as explained by the China Media Project, equates to content that describes the party and government in a positive light,⁴² and therefore

38 Mazzoli, E.M. and Tambini, D. (2020). *Prioritisation Uncovered: The Discoverability of Public Interest Content Online*. Strasbourg: Council of Europe. <https://edoc.coe.int/en/internet/11681-prioritisation-uncovered-the-discoverability-of-public-interest-content-online.html>

39 Mazzoli, E.M. and Tambini, D. (2020). *Prioritisation Uncovered: The Discoverability of Public Interest Content Online*. Strasbourg: Council of Europe. <https://edoc.coe.int/en/internet/11681-prioritisation-uncovered-the-discoverability-of-public-interest-content-online.html>

40 Wheeldon, D. (2026). *The Future of Discovery: Keeping It Fair for Creators and Partners*. Google, The Keyword). <https://blog.google/company-news/inside-google/around-the-globe/google-europe/the-future-of-discovery-keeping-it-fair-for-creators-and-partners/>

41 Article 11 of the Provisions states: “The providers of algorithmic recommendation services shall [...] actively present information that comports with mainstream value orientations in key steps such as the homepage, home screen, hot searches, selections, top content lists, and pop-up windows.” See Cyberspace Administration of China Law Translate. (2021). *Provisions on the Management of Algorithmic Recommendation in Internet Information Services*. <https://www.chinalawtranslate.com/en/algorithms/>

42 China Media Project. (2021). *The CMP Dictionary: Positive Energy*. https://chinamediaproject.org/the_ccp_dictionary/positive-energy/

allows the government to tighten its control of online media environments.⁴³ In this sense, China's prominence regime exemplifies the most extreme risks associated with prominence frameworks: how they can be used for anti-democratic purposes to reinforce state propaganda, rather than improving access to public interest information.

Respondents may argue that a comparable scenario to Communist China is unlikely in the UK or wider Europe, given the presence of more established democratic safeguards and protections for media independence. However, it's important to acknowledge that the capture of media environments has become a consistent feature of the far-right playbook in Europe in recent years. From Italy to France, Germany to Hungary, Europe's far-right has been reshaping public media organisations to consolidate their influence.⁴⁴ In Italy, senior positions within the public broadcaster RAI have been filled by figures linked to Giorgia Meloni's Brothers of Italy party, while its current CEO, Giampaolo Rossi, has previously expressed support for leaders such as Vladimir Putin. In Hungary, a series of acquisitions by media oligarchs aligned with Viktor Orbán's government has contributed to the state securing influence over approximately 80% of the country's media outlets.⁴⁵ As populists increasingly embed themselves within government and media institutions, it becomes ever important that policymakers tasked with the challenge of designing prominence rules for the platform environment ensure they are implemented with robust democratic safeguards for maintaining the independence and pluralism of our information ecosystems.

And yet, discussions about the risks of media capture through prominence rules for online platforms must also account for the significant influence that technology companies already exert over content prioritisation. At present, two of the most important mechanisms shaping visibility in online information ecosystems, search rankings and recommender systems, are largely determined by the algorithmic design choices of platforms themselves. In the UK, users are not offered options to opt-out from recommender algorithms, which means that they have no choice but to access a feed where the process for prioritising content is the proprietary of the platform – whether Meta, YouTube, or X. Platforms will argue that their 'engagement-first' design choices do not push content to users, but allow users to decide, because they prioritise content based on users' previous viewing history.

As YouTube wrote in a blog critiquing prominence rules: "Videos get engagement because they connect with their audience, not because a gatekeeper chose them. [...] We believe viewers should decide."⁴⁶ However, this argument fails to acknowledge the 'gatekeeping' role that platform recommender algorithms already play over the online information ecosystem. Engagement-first design choices may prioritise the content that has received most engagement from viewers, but this may not necessarily align with viewers' preferences for what content that actually consider to be in the public interest. Additionally, these algorithms are consistently referred to as "black boxes", making it largely impossible for the public to determine what factors determine the prioritisation of content on their feeds. As Jonathan Heawood from the Public Interest News Foundation put it: *"If we're speaking about capture, we need to remember that the media environment is already captured. By Big Tech."* Just as UK policymakers must safeguard against disproportionate state control of content prioritisation, they must also address the risks of capture by commercial actors, including major technology platforms.

Prominence rules must be devised with careful consideration to guardrails and safeguards to ensure that content prioritisation processes benefit, and continue to benefit, media pluralism,

43 Yang, P. and Tang, L. (2018). Positive energy: Hegemonic intervention and online media discourse in China's Xi Jinping era. *China: An International Journal*, 16(1), pp. 1-22. <https://pearl.plymouth.ac.uk/pbs-research/90>

44 Carrington, D. et al. (2026). Can Europe's Public Service Media Survive Attacks by the Far Right? *The Guardian*. <https://www.theguardian.com/world/ng-interactive/2026/mar/31/can-europes-public-service-media-survive-attacks-by-the-far-right>

45 Ibid.

46 Wheeldon, D. (2026). The future of discovery: Keeping it fair for creators and partners. <https://blog.google/company-news/inside-google/around-the-globe/google-europe/the-future-of-discovery-keeping-it-fair-for-creators-and-partners/>

media independence and cultural diversity. Later, this paper outlines safeguards needed to effectively mitigate these risks – including robust transparency measures, co-regulatory mechanisms, appeals processes and algorithmic choice.

1.3.2 “No silver bullet” to tackling imbalance of power in our information environment⁴⁷

Finally, it is important not to overstate the potential benefits of updating prominence rules. They should not be viewed as the single solution to the varying and complex challenges facing the platform environment. Despite the democratic benefits of prominence rules for the platform environment – in terms of citizen access to information, and supporting the financial sustainability of public interest media organisations – it must be emphasised that, in the long-term, prominence rules will not be sufficient to fundamentally address the structural dependencies of media organisations on platforms in the contemporary media environment. Even with updated prominence rules to improve the visibility of their content on platforms, media organisations will still be reliant on platforms for distribution and reach – whether through search rankings, AI overviews, or recommender algorithms. And while these overwhelming dependencies exist, citizens will continue facing challenges in accessing public interest information.

To truly address the myriad of structural vulnerabilities and threats to our continually evolving information supply chains, upgrades to a prominence regime must be complemented by a broader cross-government epistemic security strategy that enables a range of legal and policy interventions that reflect a cohesive and balanced reform agenda. Though far beyond the scope of this paper, such a strategy could also include, for example: competition approaches to address platform monopolies, taxes and bargaining codes, clarifications on copyright protection, and the establishment of digital public infrastructure to create options for public platform alternatives.

⁴⁷ Ofcom. (2025). Transmission Critical: The Future of Public Service Media. <https://www.ofcom.org.uk/siteassets/resources/documents/public-service-broadcasting/public-service-media-review/transmission-critical-the-future-of-public-service-media.pdf?v=400631>

2. RECOMMENDATIONS: INCREASING THE DISCOVERABILITY OF PUBLIC INTEREST NEWS

The analysis so far has underscored a key tension: prominence rules can expand access to public interest content, yet poorly designed interventions risk enabling political and/or commercial capture, and may attract significant controversy. This section addresses how that tension can be managed in the UK, setting out practical recommendations for strengthening the prominence and discoverability of public interest news within the online information environment, while also safeguarding against risks.

Drawing on interviews with stakeholders across the media, technology, policy, and civil society sectors, we encountered deeply divergent views shaped by competing institutional interests. Against this backdrop, the recommendations are anchored in a single guiding priority: improving the democratic integrity of the information ecosystem and its role in supporting informed citizenship. This requires sustaining a pluralistic, independent and thriving media landscape.

Section 2.1 makes specific recommendations to improve the discoverability of public interest news in two critical domains: the prominence of PSB content on video-sharing platforms, and the visibility on social media platforms of certain news publishers who meet criteria for ‘public interest news’.

Section 2.2 proposes a set of overarching policy measures that establish the enabling governance foundations for an effective prominence regime. These include transparency and meaningful access to platform data; co-regulatory oversight structures; user-facing algorithmic opt-out options; and clear appeals mechanisms to challenge prioritisation decisions. These enabling foundations are vital no matter which way a government chooses to intervene on prominence.

2.1 NEW PROMINENCE REQUIREMENTS FOR PUBLIC INTEREST NEWS

This section charts multiple pathways for determining which public interest content to give prominence to. The first recommendation calls for greater prominence on video-sharing platforms for public service broadcasters who already benefit from existing prominence rules on broadcast television and connected TVs. The second recommendation calls for increased discoverability on social media platforms for news publishers meeting certain ‘public interest’ criteria which requires the establishment of a ‘public interest news’ definition. These complementary recommendations for new prominence rules reflect the plural nature of the UK’s public interest media landscape.

2.1.1 PSB content and video-sharing platforms

The government should require video-sharing platforms to guarantee greater prominence for PSB content, ensuring that democratically important information remains discoverable within digital media ecosystems. This should prioritise PSB content with the highest civic value, particularly news and children’s programming, but not exclusively.

When determining which content should be deemed in the public interest and therefore worthy of prioritisation, PSB content is the logical starting point. Under their licensing, they hold public interest obligations. They are subject to Ofcom’s Broadcasting Code which sets out standards requiring PSBs to provide accessible, impartial, and culturally diverse content. This means that, in a largely unregulated UK press environment, PSBs are subject to more robust regulatory oversight for public interest content than other media providers.

Additionally, PSB prominence on video-sharing platforms is the logical next step for the UK’s prominence frameworks. Currently, the Media Act places obligations for PSB prominence on linear television and radio broadcasting and connected devices. However, the boundary between television and online video has effectively dissolved, with platforms such as YouTube now serving as the primary gateway to audiovisual media for large sections of the public. In this environment, the historical mechanisms that ensured visibility for public service broadcaster (PSB) content are no longer fit for purpose and should be updated. The next step for extending existing prominence rules is video-sharing platforms.

The proposal to extend existing prominence rules for PSBs to video-sharing platforms has already received support from PSB executives, who released a rare joint call for PSB prominence on YouTube in September 2025;⁴⁸ from Ofcom, who recommended the prominence of PSB news and children’s content on video-sharing platforms in *Transmission Critical*;⁴⁹ and from the Secretary of State for Culture, Media and Sport, Lisa Nandy, who expressed strong support for the principle, saying: “If we need to regulate, we will [...]”⁵⁰

To be clear, a healthy democracy depends on a pluralistic media environment in which a diverse ecosystem of media providers can thrive, and in which citizens are able to choose between a range of public interest information sources that reflect their communities of interest, location, and identity. It is essential that any measures to enhance the prominence of public service broadcaster content do not inadvertently disadvantage the wider media ecosystem.

At the same time, it is important to emphasise the role public service media plays in a healthy democracy. When PSBs operate according to their fundamental principles – of accountability, accessibility, impartiality, independence, pluralism, reliability, and universalism – their democratic

48 BBC Media Centre. (2025). Public Service Broadcasters - These measures can help secure distinct British broadcasting for the future. <https://www.bbc.co.uk/mediacentre/articles/2025/public-service-broadcasters-measures-secure-distinct-british-broadcasting>

49 Ofcom. (2025). *Transmission Critical: The Future of Public Service Media*. <https://www.ofcom.org.uk/siteassets/resources/documents/public-service-broadcasting/public-service-media-review/transmission-critical-the-future-of-public-service-media.pdf?v=400631>

50 Kanter, J. (2025). Lisa Nandy and Ofcom Plan Crackdown on YouTube Over Public Service Media Prominence. *Deadline*. <https://deadline.com/2025/09/lisa-nandy-youtube-ofcom-1236544787/>.

value in the online information ecosystem is undeniable. PSBs offer major public benefits regarding their provision of accurate and reliable news by PSBs. Despite public viewing habits increasingly moving towards platform-mediated information, PSBs still remain the most used and trusted sources of news for UK audiences.⁵¹ Crucially, PSBs provide public interest content that is free at the point of use, reinforcing the principle of universality by ensuring that high-quality programming is accessible to all audiences, regardless of income or ability to pay.⁵² Beyond being simply media providers, PSBs can be understood as part of the UK's democratic information infrastructure, helping to sustain a shared public sphere and maintain a common set of reliable reference points in an increasingly fragmented media environment. This role is reflected in the distinctive contributions PSBs make both nationally and regionally: for example, ITV supports regional representation and democratic engagement by investing in news and production across the nations and regions which helps to counter the concentration of media power in London and ensuring that local issues and perspectives remain visible within the national media landscape.⁵³ Based on this clear democratic value of PSBs as part of a pluralistic media environment, the government should mandate PSB prominence on video-sharing platforms to harness these resounding democratic benefits in the digital age.

2.1.1.2 Prominence for PSB news and children's content

A key challenge when discussing prominence rules for PSB content on video-sharing platforms is the question of whether prominence regimes should specify which types of PSB content should be prioritised, or whether PSBs should be left to decide which content they think should be promoted. Prominence regimes for PSB content on video-sharing platforms should prioritise visibility for content with the highest civic value – in particular news and children's content – where 'civic value' may be defined as information:

*"empowering the public to participate in democratic processes, by informing individuals about the world around them, raising awareness of issues that affect their lives and communities, and fostering audiences' sense of their own place in public life."*⁵⁴

PSBs have argued that, because they are legally required to fulfil a public interest remit, all their content can be considered of public value, in so far as it contributes, directly or indirectly, to their broader obligations to inform, educate, and entertain audiences, reflect the diversity of the UK, and support cultural and social life. From this perspective, even programming that is primarily entertainment-focused may still be seen as serving public value by sustaining audience engagement with public service media, providing shared cultural reference points, and helping quickly access news, current affairs, and children's educational programming when the entertainment is finished.

Despite the importance of entertainment-focused content, not all PSB content should be considered as having equal civic value, and therefore not all PSB content should receive prominence on video-sharing platforms. For example, ITV's *Love Island* or Channel 4's *Naked*

51 Ofcom. (2025). Public Service Media Review. <https://www.ofcom.org.uk/tv-radio-and-on-demand/public-service-broadcasting/public-service-media-review>

52 Ibid.

53 ITV Press Centre. (2021). A New Report by Mediatique Highlights the Important Role Played by ITV in the Nations and Regions. <https://www.itv.com/presscentre/media-packs/new-report-mediatique-highlights-important-role-played-itv-nations-and-regions>

54 Chivers, T. and Allan, S. (2022). What Is the Public Value of Public Service Broadcasting? Exploring Challenges and Opportunities in Evolving Media Contexts. Creative Industries Policy and Evidence Centre. <https://pec.ac.uk/wp-content/uploads/2024/01/What-is-the-Public-Value-of-Public-Service-Broadcasting-PEC-Discussion-Paper-Jan-2022.pdf>

Attraction may attract significant audience attention and commercial value, but they cannot reasonably be understood as delivering the same level of civic value as PSB news programming, children’s content, coverage of elections, or even factual documentaries.⁵⁵

A flexible approach is needed when defining content of civic value, which shouldn’t be limited to just news and children content. For example, PSB news provision plays a central democratic role in informing citizens, supporting accountability, and enabling participation in public life. This is reflected in audience perceptions: in 2020, audiences rated the provision of trusted and accurate news as the single most valuable benefit that UK PSB creates both for individuals and for society overall,⁵⁶ with the UK’s PSB news content being rated as the most used and trusted sources overall of news and current affairs for British audiences.^{57,58}

Similarly, the prominence of high-quality children’s content is justified on both developmental and civic grounds. Ensuring visibility for such content enables younger audiences to access age-appropriate, educational, and high-quality material, which supports their emotional wellbeing and contributes to their longer-term development as informed and engaged democratic citizens.^{59,60}

Additionally, factual dramas can play an important role in informing the public and raising awareness of national issues. As seen in the case of ITV’s *Mr Bates vs The Post Office*, they can even result in public accountability for miscarriages of justice, whereby victims of the Post Office Horizon scandal received forms of legal and financial redress following public outcry.

An additional reason not to extend prominence to all PSB content on video-sharing platforms, and encourage only PSB content of highest civic value, is because prioritising all PSB content could create incentives for PSBs to prioritise commercially advantageous content – since greater visibility is closely linked to advertising revenue and audience reach. In 2024, news programming across BBC News at Six, BBC News at Ten, and ITV News attracted average audiences of around 2.3 to 3.6 million, whereas entertainment formats such as *I’m A Celebrity... Get Me Out of Here!* and *Strictly Come Dancing* drew substantially higher audiences of 9.1 million and 8 million respectively.⁶¹ There is therefore a risk that PSBs would prioritise uploading and promoting high-performing entertainment content, rather than content with greater democratic significance. To ensure prominence rules deliver genuine democratic benefits, PSBs should prioritise content of highest civic value, such as news and children’s content, when selecting material for enhanced visibility on video-sharing platforms. Decisions about what constitutes such content of ‘highest civic value’ should be made by the PSBs rather than by the platforms – this would allow PSBs to exercise editorial judgment and ensure that prominence obligations remain adaptable to changing public needs and contexts that may influence what constitutes ‘highest civic value’.

55 Ibid.

56 Ofcom. (2020). Public Service Broadcasting Omnibus Survey Findings. <https://www.ofcom.org.uk/siteassets/resources/documents/tv-radio-and-on-demand/broadcast-guidance/psb/psb-2020/attitudes-to-psb---july-2020/public-service-broadcasting-omnibus-survey-findings?v=325108>

57 Nic Newman et al. (2020). Digital News Report 2020. Oxford Reuters Institute for the Study of Journalism. https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2020-06/DNR_2020_FINAL.pdf

58 Ofcom. (2020). Media Nations 2020: UK Report. <https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/multi-sector/media-nations/2020/media-nations-2020-uk-report.pdf?v=325140>

59 Khalil, H. (2024). YouTube urged to promote “high-quality” children’s programmes. BBC News. <https://www.bbc.co.uk/news/articles/cgrwvvp9z4wo>

60 Ofcom. (2025). Transmission Critical. The Future of Public Service Media. <https://www.ofcom.org.uk/siteassets/resources/documents/public-service-broadcasting/public-service-media-review/transmission-critical-the-future-of-public-service-media.pdf?v=400631>

61 TV Licensing. (2025). Top 10 Most Popular TV Shows by Genre in the UK. <https://www.tvlicensing.co.uk/top-10-most-popular-tv-shows-by-genre-in-the-uk>

2.1.1.3 Legislating on PSB prominence

The government has been hesitant to introduce new prominence legislation, instead favouring voluntary agreements between platforms and providers. However, legislation on PSB prominence is needed to have a significant impact on the availability of public interest news content in the online information ecosystem. In order for prominence frameworks to include the democratic safeguards mentioned above, legislation will be needed, instead of relying on the good faith of platforms.

The recommendation for legislation on PSB prominence is unpopular among tech platforms and many media industry players, who expressed strong preference for voluntary agreements in interviews. They suggested that non-legislative routes would be a more realistic route to achieve support tech platforms who, resistant to legally-binding regulation on their recommender systems, may be incentivised into voluntary agreements in the shadow of regulation. Additionally, others expressed concerns in an interview that mandatory prominence could impact commercial negotiations in other areas between PSBs and platforms – such as ITV and Channel 4's existing deals with YouTube which allow them to upload their content in exchange for selling ad revenue.^{62,63}

However, voluntary agreements are not transparent. Their opacity undermines a core principle of democratic prominence regimes: that they should be open to public scrutiny and accountability. Maria Luisa Stasi, a competition lawyer at Article 19 explained that, as private deals between businesses, there would be no requirement for the details of voluntary agreements to be disclosed. This would have a significant impact on possibilities for external scrutiny on the nature and impacts of any voluntary agreements.⁶⁴ As a result, it becomes difficult, if not impossible, to assess whether such agreements are effectively safeguarding prominence objectives or protecting against risks such as media capture. Key questions remain unanswered due to a lack of basic information: what PSB content is prioritised, how prioritisation decisions are made, and on what financial terms these arrangements operate. A prime example is the BBC's recent deal with YouTube – under which the BBC will create bespoke content for the platform. The granular details of the landmark commercial partnership remain unknown to public knowledge because the deal is private, making it incredibly difficult for independent experts and citizens to evaluate to what extent the BBC is benefitting from the partnership, whether the terms unfairly advantage YouTube, how the BBC will manage the agreement for content production or how the BBC will fund the content.

Voluntary agreements also lack meaningful mechanisms for oversight or enforcement when platforms make changes to their systems. In practice, platforms retain significant control over recommender systems, algorithmic ranking and interface design, meaning they can quietly alter how PSB or public interest content is surfaced without external scrutiny. Without statutory transparency obligations or formal data-sharing arrangements, it becomes extremely difficult for regulators, civil society organisations, researchers or even publishers themselves to determine whether changes to recommendation systems have undermined the spirit or effectiveness of a voluntary agreement. This creates a situation in which platforms are able to obfuscate the impact of design or algorithmic changes while continuing to claim compliance with broad prominence commitments. A legislative framework would therefore provide an essential regulatory backstop by introducing clearer obligations around transparency, accountability and data access.

⁶² ITV Press Centre. (2024). ITV and YouTube Announce New Partnership. <https://www.itv.com/presscentre/media-releases/itv-and-youtube-announce-new-partnership>

⁶³ Channel 4 Press Centre. (2022). Channel 4 and YouTube Strike Pioneering Content and Commercial Partnership. <https://www.channel4.com/press/news/channel-4-and-youtube-strike-pioneering-content-and-commercial-partnership>

⁶⁴ Interview with Maria Luisa Stasi, Article 19 on 20th March 2026

Secondly, business-to-business agreements are not subject to public interest tests. We heard concerns that voluntary arrangements would prioritise securing commercial benefits for both PSBs and platforms, rather than advancing clear public interest objectives. In the absence of statutory requirements, there is no guarantee that such agreements will consistently align with broader democratic goals, including ensuring access to high-quality and trustworthy information. By contrast, legislating for PSB prominence would introduce a statutory obligation on platforms to prioritise content deemed to be in the public interest, specifically PSB content with the highest civic value. This would anchor prominence decisions in clearly defined democratic principles rather than commercial negotiation between private actors. The starting point for prominence rules in the platform environment must be citizen access to high-quality news and information, rather than the maximisation of commercial profit or platform engagement metrics.

And finally, there is a need for legislation rather than voluntary agreements because platforms have a clear advantage over PSBs at the negotiating table. Currently, there is an extremely unequal playing field between PSBs and platforms in commercial negotiations. For example, ITV's commercial agreement with YouTube, in which the PSB is able to sell ad revenue against its content on the platform, allows YouTube to take a significant percentage of the ad revenue. Although the specific percentage split for the ITV-YouTube deal is not publicly disclosed (because private deals have no public disclosure obligations), the deal operates within YouTube's framework of standard high-volume partner agreements, as part of which YouTube generally takes a 45% cut.

There is wide agreement among PSBs that taking a high percentage cut is an unfair advantage for YouTube. In interviews, policy experts from public service broadcasters said that platforms should not make significant profits from prominence deals with PSBs. Given the strong market power of platforms and their commercial advantage over PSBs, there is not enough incentive for fair voluntary agreements to be reached. Relying on platforms to act in good faith is therefore unrealistic. Instead, the government should step in and introduce legal rules that require platforms to ensure PSB content is properly visible and prioritised.

The most plausible route for legislating on PSB prominence on video-sharing platforms is through amending the Media Act. Cristina Nicolotti Squires, the Group Director for Broadcast and Media for Ofcom, has previously described PSB prominence on video-sharing platforms as "a logical next step" for the UK's must-carry rules, following the introduction of the Media Act in 2024.⁶⁵ On a technical level, PSB prominence can be achieved through algorithmic prioritisation or through user interface design, for example by making PSB news content more visible via dedicated tabs, homepage placement, or stronger integration within recommendation systems.

⁶⁵ Brooker, A. (2025). Public Service Broadcasters Need Stable Funding for News and Prominence on YouTube, Ofcom Finds. Press Gazette. <https://pressgazette.co.uk/publishers/broadcast/public-service-broadcasters-need-stable-funding-for-news-and-prominence-on-youtube-ofcom-finds/>

RECOMMENDATION 1

Statutory prominence for PSB content on video-sharing platforms with the highest civic value

The government should create a new regime for video-sharing platforms to give statutory prominence to PSBs content deemed of highest civic value on video-sharing platforms through:

- Algorithmic prominence, or;
- User interface design

Ofcom guidance should encourage PSBs to prioritise their content that serves the highest civic value, especially news and children's content, for prominence on video-sharing platforms.

2.1.2 Discoverability of news publishers on social media platforms

Alongside prominence for PSBs on video-sharing platforms, the government should introduce new legislation requiring platforms to enhance the discoverability of public interest news publishers on social media platforms. This section outlines how this could be achieved through algorithmic prominence - placing requirements on platforms to integrate parameters into their recommender systems that prioritise "public interest" news publishers. This proposal would deliver a range of democratic benefits by increasing public access to high-quality news information.

Firstly, regulation to increase the discoverability of trusted news publishers would ensure that good-quality news information reaches audiences where they are, in line with contemporary news consumption habits. In fact, 20% of UK adults now say that social media is their main source of news, with this percentage figure rising for younger generations. Algorithmic prominence for news publishers who provide accurate and reliable information that is subject to robust editorial workflows would allow citizens to access the information they need to develop informed opinions, scrutinise those in power, and participate in democratic decision-making.

Secondly, the proposal would place legal accountability on platforms to design their recommender algorithms in line with public interests. At present, recommender algorithms are designed to maximise audience engagement by drawing on signals referring to a user's likelihood of engaging with a single post.⁶⁶ A growing body of research demonstrates that these engagement-first design choices of recommender algorithms undermine public interests because they disproportionately amplify content eliciting strong emotional reactions – including discriminatory, hateful, or violent content – even if it is false or misleading. For example, Amnesty International's analysis of X's recommender algorithm during the Southport riots in 2024 found that it created fertile ground for inflammatory racist narratives to thrive – with significant online and offline human rights consequences for migrants, Muslims, and racialised

⁶⁶ The Washington Post. (2021). How Facebook shapes your feed. <https://www.washingtonpost.com/technology/interactive/2021/how-facebook-algorithm-works/>

communities.⁶⁷ Similarly, other studies have documented the impacts of recommender algorithms on electoral processes through the asymmetrical amplification of political content – in contradiction to fundamental democratic standards. For example, the Institute for Strategic Dialogue (ISD) found that, in the lead up to the German federal election, TikTok’s algorithm disproportionately amplified fan pages of the far-right party Alternative für Deutschland (AfD).⁶⁸

By contrast, regulation requiring platforms to increase the discoverability of trusted news publisher content on social media platforms would help to mitigate the corrosive impacts of engagement-first algorithmic design choices on fundamental rights and democracy. It would ensure that information that is subject to robust editorial standards is more visible to users. This would give users greater access to news information that: as part of the rigorous editorial workflow expected of high-quality journalism, has undergone thorough fact-checking processes to ensure accuracy and reliability; has been published by an organisation subject to guidelines requiring them to avoid discrimination of any kind, such as prejudicial references to a person’s race, religion, gender, or disability.⁶⁹ In doing so, the proposal could mitigate people’s susceptibility to the misleading, false, or inflammatory content that is proliferated by engagement-first recommender algorithms by ensuring they also access ‘public interest’ news information from trusted sources.

Thirdly, regulation to increase the discoverability of ‘public interest’ news publishers on social media would bring commercial revenue to diverse media organisations in the form of clickthroughs and web referrals to generate income via advertising or subscriptions. This would support the long-term financial sustainability of diverse ‘public interest’ news publishers, contributing to a pluralistic media environment that is fundamental for healthy democratic functioning.

The proposal for regulation to increase the discoverability of news publishers on social media platforms has already received support from parliamentarians in the UK and Europe, and from EU civil society. The House of Lords Communications and Digital Committee called for prominence on social media for news publishers recognised by the Online Safety Act (2023) definition in their 2024 ‘Future of News’ report,⁷⁰ while in the EU in late 2025, the Danish Presidency of the Council of the European Union proposed conclusions for the European Democracy Shield (EUDS). Despite near unanimous support from 26 out of 27 member states, Hungary vetoed the conclusions, and as such they were transformed into Presidency conclusions.^{71,72} Back in 2023, there were calls from EU civil society for the European Media Freedom Act (EMFA) to increase the online prominence of news media, with Reporters Without Borders (RSF) urging MEPs to include an obligation from online platforms for the ‘amplification of reliable news media’.⁷³

In interviews, the media industry was largely supportive of a version of the news prominence that would increase visibility for a diverse range of publishers – and especially smaller, independent news publishers, such as local newspapers – because of the commercial benefits of increased visibility. By contrast, tech platforms we interviewed were staunchly opposed to the notion of algorithmic regulation, saying it would place excessive burden on platforms to

67 Amnesty International. (2025). UK: Technical Explainer on X’s Recommender System and the 2024 Racist Riots. <https://www.amnesty.org/en/documents/eur45/0618/2025/en/>

68 Wengeler, M., Katzy-Reinshagen, A., Barth, S. and Degeling, M. (2025). Towards transparent recommender systems: Lessons from TikTok research ahead of the 2025 German federal election, Institute for Strategic Dialogue. <https://www.isdglobal.org/digital-dispatch/towards-transparent-recommender-systems-lessons-from-tiktok-research-ahead-of-the-2025-german-federal-election/>

69 IPSO (2025). Editors’ Code of Practice. <https://www.ipso.co.uk/editors-code-of-practice/>

70 House of Lords Communications and Digital Committee. (2024). The Future of News. <https://lordslibrary.parliament.uk/the-future-of-news-report-by-the-house-of-lords-communications-and-digital-committee/>

71 Council of the European Union. (2025). Presidency conclusions on access to reliable news as part of the European Democracy Shield. <https://data.consilium.europa.eu/doc/document/ST-15992-2025-INIT/en/pdf>

72 EWB. (2025). Hungary vetoes Council conclusions, Denmark issues Presidency conclusions. European Western Balkans. <https://europeanwesternbalkans.com/2025/12/17/hungary-vetoes-council-conclusions-denmark-issues-presidency-conclusions/>

73 RSF. (2023). The EMFA should make platforms “amplify reliable news media,” RSF says. <https://rsf.org/en/emfa-should-make-platforms-amplify-reliable-news-media-rsf-says>

implement, and that it would undermine user choice as to what content they see. However, YouTube's point about user choice misrepresents the degree of agency that users currently have over their feeds – it suggests that users currently have autonomy over what content they see, when in reality, as the research studies above prove, engagement-first algorithms disproportionately target users with inflammatory content eliciting strong reactions.

This section outlines how the proposal for increasing discoverability of 'public interest' news sources can be effectively implemented in ways that safeguard against the risks of capture outlined in the first part of the report. To support media plurality and provide benefit to diverse news publishers, algorithmic prominence should be achieved through a parameter-based approach – whereby diverse parameters for evaluating transparent, ethical, and credible journalism are integrated into platform algorithms. To uphold democratic standards, media independence, and mitigate risks of media capture, oversight of these algorithmic parameters for 'public interest' news publishers should be governed by an independent and co-regulatory body made up of news organisations, regulators, and civil society. The selection of these 'public interest news' parameters should be progressed through citizen-led deliberation, based on the professional expertise of journalists, and free from government interests, to ensure they are underpinned by democratic and participatory processes that represent the public's view on trusted news sources.

2.1.2.1 Technical capabilities: algorithmic prominence of trusted news publishers

Increasing the discoverability of 'public interest' news publishers on social media platforms would be achieved through algorithmic prominence, i.e. requiring online platforms to amend their recommender algorithms in ways that increase the visibility of designated trusted news publishers.

Technically, this is a fairly straightforward endeavour which platforms are well-accustomed to doing since they are constantly adjusting the parameters of their recommender algorithms in line with their business priorities. Meta, for example, has historically given more generous visibility to news publishers on Facebook's News Feed than it currently does: in January 2018, Facebook amended its recommender algorithm to prioritise news from 'trusted sources', as well as local news,⁷⁴ and in July 2020, boosted original reporting on news feeds.⁷⁵ In recent years though, Meta has intentionally deprioritised news publishers within their recommender algorithms, partially in response to global legislative moves to support the media through platform regulation such as Australia's News Bargaining Codes.⁷⁶ Meta's turn away from the news industry has been referred to by some as its 'War of News': one recent study found that "[r]eactions to news declined by 78% between 2021 and 2024 while reactions to non-news pages increased, indicating targeted suppression of news visibility."⁷⁷ The results are based on Facebook data from 40 news organisations and 21 non-news organisations from 2016 to 2025.

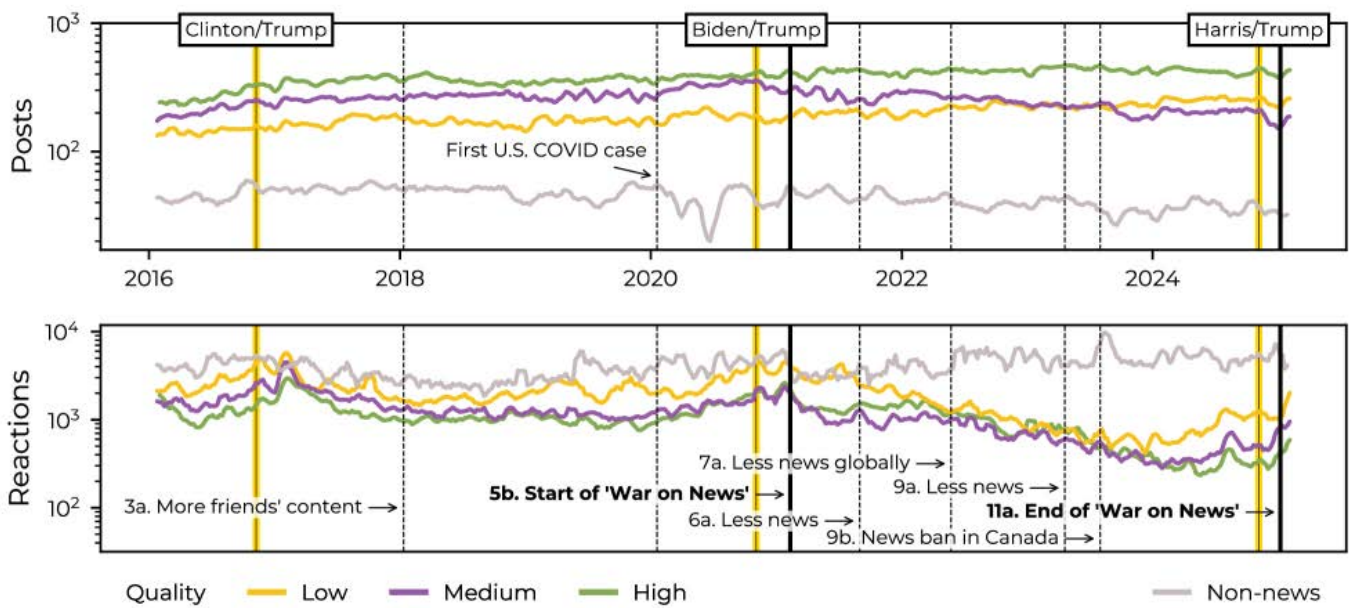
74 Zuckerberg, M. (2018). Continuing our focus for 2018 to make sure the time we all spend on Facebook is time well spent... (Facebook post). <https://www.facebook.com/zuck/posts/continuing-our-focus-for-2018-to-make-sure-the-time-we-all-spend-on-facebook-is-/10104445245963251/>

75 Meta. (2020). Prioritizing Original News Reporting on Facebook. <https://about.fb.com/news/2020/06/prioritizing-original-news-reporting-on-facebook/>

76 Majid, A. (2023). As Reach warns of traffic slowdown: How Facebook referrals to publishers have plummeted. Press Gazette. <https://pressgazette.co.uk/platforms/how-far-facebook-referral-traffic-to-news-sites-has-plummeted/>

77 Talaga, S. et al. (2025). Changes to the Facebook Algorithm Decreased News Visibility Between 2021-2024. Arxiv.org. <https://arxiv.org/html/2507.19373v1>

FIGURE 3
META'S SUPPRESSION OF NEWS VISIBILITY, 2021-2024



Source: Talaga et. al

The decision from platforms to deprioritise trusted news sources is therefore a business choice that is far from inevitable. Giving algorithmic prominence to news publishers on social media feeds is both technically feasible *and* something that platforms are already accustomed to doing. Currently, there are no incentives or obligations for platforms to prioritise news publishers in their recommender algorithms, or to prevent them from suddenly deprioritising news. This leaves news publishers extremely dependent on the business motivations of platforms in relation to their algorithmic design choices for commercial revenue and long-term financial sustainability, as well as leaving the wider public dependent on platforms for their access to trusted news sources via their social media feeds.

By introducing regulation that legally requires platforms to increase the discoverability of 'public interest' news publishers, policymakers can rebalance power between platforms and trusted news publishers, and increase citizen access to trusted news sources. To do so, the government should require platforms to adopt a parameter-based approach to algorithmic prominence by integrating certain parameters within their recommender algorithms that result in the prioritisation of diverse 'public interest' news sources.

In this regard, the Journalism Trust Initiative (JTI) sets an invaluable precedent for how this has already been technically implemented and successfully achieved.⁷⁸ The JTI, developed by Reporters Without Borders (RSF), is a self-regulatory mechanism applicable to all news providers worldwide based on an assessment framework for determining trustworthy news sources. More than 2,400 media outlets across 127 countries currently participate in the JTI. Through machine-readable signals, the JTI standards can then be utilized by algorithms for indexing, ranking, and content recommendation – and integrated into tech platforms to favour JTI-compliant sources in recommender systems and improve the visibility of trusted news sources.

The JTI's parameter-based approach allows for diverse news sources to receive increased visibility on social media feeds, and does not require prominence regimes to restrict

78 Journalism Trust Initiative (JTI). (2026). Establishing a global, neutral standard for trustworthy media. <https://journalismtrustinitiative.org/>

prioritisation to a select number of news publishers. It allows for decisions about what constitutes a 'public interest' news publisher to be made by evaluating a diverse number of factors – the JTI uses 130 – focussed on editorial processes rather than content, that could include for example that the organisation:

- Exercises accountability to internal editorial guidelines and journalistic principles;
- Undertakes robust processes for ensuring and reviewing accuracy;
- Clearly labels automatically generated content;
- Possesses adequate structures for dealing with inaccuracies and complaints;
- Operates according to good governance structures that are transparent, accountable, and responsive to the public;
- Discloses key information such as ownership structures, shareholders, management team, editorial contact details, revenue sources.

A parameter-based approach allows for news publishers across the industry to be included within prominence regimes – whether commercial or publicly-owned, national or local – provided their organisation operates according to the necessary processes and standards across the editorial workflow that are required to produce 'public interest' news. The approach allows for the public to access news sources on their social media feeds that are both in the public interest *and* plural – the two do not have to be mutually exclusive.

The integration of the JTI standards into tech platforms has received support from global media outlets and EU parliamentarians. In 2025, 255 media outlets worldwide signed an open letter calling on tech platforms to integrate the JTI in their platforms;⁷⁹ while in 2022, the EU incorporated the JTI into their Code of Practice on Disinformation, following nearly a year of negotiations between major online platforms such as Meta, Google and TikTok, civil society, and the European Commission.⁸⁰

Despite support from the media industry and the EU, the JTI has not been widely adopted by tech platforms. Since its founding, the JTI has been in negotiations with tech platforms to try to get them to integrate the standards into their algorithms. But so far, the standards have only been adopted by Microsoft's search engine Bing and, according to a 2024 report, LinkedIn is working on integrating the standard.⁸¹ Benjamin Sabbah from the JTI explained:

"To be clear, we don't think that the media industry should receive increased discoverability because it's better by nature but because they are following guidelines for producing quality content. It's about the workflow the industry has established over time for producing trustworthy content more efficiently than other information sources."⁸²

79 RSF. (2025). RSF and over 190 media outlets worldwide urge tech giants to embrace the Journalism Trust Initiative. https://rsf.org/en/lettre_commune_aux_geants_technologie_jti

80 RSF. (2022). Journalism Trust Initiative (JTI) incorporated into EU's future Code of Conduct on Disinformation. <https://rsf.org/en/journalism-trust-initiative-jti-incorporated-eu-s-future-code-conduct-disinformation>

81 Granger, J. (2024). The Journalism Trust Initiative is rewarding transparent and trustworthy news. Newsrewire. <https://www.newsrewire.com/2024/05/31/the-journalism-trust-initiative-is-rewarding-transparent-and-trustworthy-news/>

82 Interview with Benjamin Sabbah (JTI) and Vincent Berthier (RSF), 4th April 2026

According to Vincent Berthier from Reporters Without Borders (RSF) that makes sense:

“Engagement-first algorithms create incentives not to produce quality content because the platform economy needs as much content as possible to sustain audience engagement. But creating trustworthy content takes much more work and financial investment than producing misinformation. Disinformation is also an economic issue.”⁸³

The JTI also explained why legislation on algorithmic prominence for ‘public interest’ news publishers is so urgently needed: they outlined their enthusiasm for platforms to integrate the standards into their recommender algorithms through voluntary agreements, and the attempts they have made to negotiate with them, but that this has not succeeded. In regards to the fast deteriorating economic situation of most media outlets and the increasing volume of disinformation circulating online including on platforms, an immediate response is needed and can only come from the government: “We would love the platforms to voluntarily integrate trust signals like JTI for their audiences but they don’t do it. Which is why legislation is needed.”⁸⁴

Some news organisations we spoke to expressed strong preference for voluntary agreements on algorithmic prominence. They explained that legislation may undermine the ability for their organisations to enter into broader commercial negotiations with platforms. However, Jonathan Heawood from the Public Interest News Foundation (PINF) explained that voluntary agreements would disadvantage smaller, independent news publishers, and especially local newspapers, who do not have the same bargaining power or access with tech platforms as large media organisations. In the interest of a plural media ecosystem, in which a diverse range of ‘public interest’ media organisations benefit from discoverability rules, there is a strong need for legislating on a parameter-based approach.

The same concerns about voluntary agreements with PSBs also apply: that private deals would not be subject to robust transparency requirements, or public interest standards; and that tech platforms would have a strong upper hand in negotiations because of their market power, which in practice could result in news publishers entering into unfavourable terms to achieve prominence.

In order to ensure this is introduced in a robust and durable way, it should be implemented through new legislation set out in a party’s manifesto. Press regulation is often seen as divisive; a manifesto commitment would help protect the legislation from being unfairly blocked in the Lords, while still allowing for thorough debate as the bill progresses through Parliament.

2.1.2.2 Defining ‘public interest’ news parameters

A parameter-based content prioritisation process for ‘public interest’ news will depend on a robust definition of what those parameters are. Clarifying these algorithmic parameters will progress longstanding discussions among media industry, government and civil society about defining ‘public interest journalism’.

⁸³ Interview with Benjamin Sabbah (JTI) and Vincent Berthier (RSF), 4th April 2026

⁸⁴ Interview with Benjamin Sabbah (JTI) and Vincent Berthier (RSF), 4th April 2026

The challenges of reaching a ‘public interest news’ definition have been summarised in a previous Demos research report, saying:

“The problem with reaching a definition of public interest journalism is that if you ask the politicians, regulators or the platforms to do it, it is rightly seen as an assault on the freedom of the press; if you ask the press to do it, there is a clear interest in defining it as widely as possible in order to support their business models, rather than the quality of the information environment.”⁸⁵

Currently, there are a number of different definitions across the UK from various bodies and organisations, but without consensus. Definitions have been proposed by the National Union of Journalists (NUJ),⁸⁶ IPSO’s Editors’ Code of Practice,⁸⁷ the Media Innovation Lab’s News Futures 2035 project,⁸⁸ as well as by the Welsh Government⁸⁹ and Scottish governments.⁹⁰ Although each definition differs in details, broadly they establish criteria for journalism that prioritises: public accountability; civic engagement to enable informed democratic participation; local and community relevance; ethical standards; and robust editorial processes for fact-checking. In 2019, the analysis in the Cairncross Review concluded that “public interest” news should focus on investigative journalism and reporting on public institutions, but did not arrive at more specific criteria.⁹¹

This report does not propose relying on the government’s definition of “recognised news publishers”, as set out in the Online Safety Act, for the purposes of determining prominence, as the category is designed primarily around publisher status and legal exemptions rather than the civic or democratic value of the content itself. Instead, the proposed approach to prominence prioritises the public interest function of journalism, focusing on editorial standards, accountability and democratic value rather than institutional identity alone. However, this definition may still be used in the context of the data access provisions set out in the section below, where it can provide a useful administrative baseline for identifying relevant publishers for transparency and reporting requirements.

To progress with definitions of ‘public interest news’, the parameters for algorithmic prominence should build on existing precedents, efforts and expertise from bodies across the UK. The parameters should be rooted in criteria for trustworthy editorial workflows and procedural fairness – similar to the approach pursued by the JTI. This would ensure that information is prioritised on the public’s social media feeds when the publisher’s production practices are sufficiently thorough, and their institutional structures have adequate accountability structures. For instance: there are editorial guidelines, standards and procedures in place to promote the publication of accurate, reliable and trustworthy information; after publication, there are

85 Perry, H. et al. (2024). Driving Disinformation: Democratic deficits, disinformation and low traffic neighbourhoods - a portrait of policy failure. Demos. <https://demos.co.uk/research/driving-disinformation-democratic-deficits-disinformation-and-low-traffic-neighbourhoods-a-portrait-of-policy-failure/>

86 NUJ. (2002). Public Interest: How the NUJ defines the public interest. <https://www.nuj.org.uk/about-us/rules-and-guidance/code-of-conduct/public-interest.html>

87 IPSO. (2025). Editors’ Code of Practice. <https://www.ipso.co.uk/editors-code-of-practice/>

88 Media Innovation Studio. (2022). News Futures 2035: Public Interest News Definition. <https://mediainnovationstudio.org/wp-content/uploads/2024/07/PIN-Definition.pdf>

89 Welsh Government. (2023). Of and For Wales: Towards a Sustainable Future for Public Interest Journalism. <https://www.gov.wales/sites/default/files/publications/2023-08/of-and-for-wales-towards-a-sustainable-future-for-public-interest-journalism.pdf>

90 Scottish Government. (2021). Scotland’s News - towards a sustainable future for public interest journalism. <https://www.gov.scot/publications/scotlands-news-towards-sustainable-future-public-interest-journalism/pages/3/>

91 The Cairncross Review a Sustainable Future for Journalism. (2019). https://assets.publishing.service.gov.uk/media/5c6bfcd4e5274a72b933311d/021919_DCMS_Cairncross_Review_.pdf

processes in place for feedback, complaints, and appeals; and the organisation's governance, including ownership structures and revenue sources, are transparent, accountable, and responsive to the public.

The development of 'public interest news' parameters for algorithmic prominence must be achieved without government involvement – both to prevent state overreach over information ecosystems, and to prevent backlash from the media industry based on accusations of censorship – and should be embedded within the journalistic profession, civil society, and the public. Demos has previously emphasised the importance of public participation in the process to establish a definition for 'public interest news':

"In order for [...] social media companies to give [public interest news] due prominence, we need a shared definition of 'public interest news'. It is not the role of government to define this, and industry is not independent enough. This needs a democratic approach."⁹²

Citizen involvement in progressing definitions for 'public interest news' parameters will be crucial for establishing prominence regimes that have democratic legitimacy, prevent disproportionate influence from self-interested parties, and establish a solid basis of support across media, government, technology companies, and civil society.

The ongoing governance of these 'public interest news' parameters should be undertaken by a co-regulatory oversight body to ensure independence, prevent capture, and remain responsive to changing media environments (see Recommendation 2).

92 Seger, E., Perry, H. and Hancock, J. (2025). Epistemic Security 2029. Fortifying the UK's Information Supply Chain to Tackle the Democratic Emergency. Demos. https://demos.co.uk/wp-content/uploads/2025/02/Epistemic-Security-2029_accessible.pdf

RECOMMENDATION 2

Algorithmic prominence for 'public interest' news sources on social media feeds

The government should introduce new legislation requiring platforms to give algorithmic prominence to 'public interest' news sources on social media feeds. Algorithmic prominence would be achieved through a parameter-based approach, such as the JTI, to support media plurality.

- The parameters for 'public interest' news sources should be based on standards for trustworthy editorial workflows, procedural fairness, and governance structures that are transparent, accountable, and responsive to the public.
- Oversight of the 'public interest news' parameters would be managed by the independent co-regulatory body to maintain media independence and prevent capture (see Recommendation 2).
- Definitions for parameters would be progressed without government involvement, involving: media industry professionals, civil society, and the public.
- Citizen involvement to progress definitions through public deliberation will give 'public interest' news parameters democratic underpinning.

2.1.3 Financial sustainability for the UK's public interest media content

This report has outlined the connection between updated prominence frameworks and the need to secure greater financial support for public interest media organisations. Therefore, updated prominence rules should require platforms to give 5% of their UK profits to a content fund for UK public interest audiovisual media.

As outlined in the first section, the current business model of platforms is to extract significant financial value from public interest content produced by PSBs and the UK's wider public interest media content by negatively influencing visibility and discoverability, and therefore advertising revenue. The paper has outlined how prominence measures would support the financial sustainability of media organisations by driving ad revenue. However, the paper also emphasised that the challenge of sustaining the media industry cannot be resolved through increased ad revenue alone. Platform incentives remain fundamentally misaligned with the sustainable provision of public interest media, meaning increased advertising revenue alone will not secure sufficient investment in socially valuable content. The government should therefore introduce a levy on video-sharing platforms, under which qualifying platforms would contribute a percentage of their UK revenue to a dedicated UK content fund supporting the production of public interest media.

The levy would apply to video-sharing platforms that exceed a specified annual UK revenue threshold, for example, those generating more than £25 million annually, with contributions calculated as a 5% proportion of UK revenues. The fund would be broad in its eligibility, enabling a wide range of UK creators to apply for grants, including PSBs, independent media organisations, content creators and influencers. Eligibility should therefore be defined broadly, with greater emphasis placed on the type of public interest content being produced rather than

on the identity of the producer itself. The fund would be administered by an independent body, entirely separate from government or industry interests, in order to ensure independence and accountability to public interests. A helpful precedent for the management of this fund is the Young Audiences Content Fund, which operated between 2019 and 2022 and was managed by the British Film Institute to support the production of high-quality, distinctive content for audiences up to the age of 18 on public service broadcasters and platforms.⁹³ Although now discontinued, evaluations of the Fund concluded that the approach proved effective at delivering high-quality public service content for young audiences across different genres, contributing to a more plural landscape in the industry.⁹⁴

The fund would support news providers and digital creators to innovate in the production of audiovisual and digital-first content, recognising that audiences increasingly access news and public interest information through video, audio and platform-native formats. In order to increase visibility, providers need to meet people where they are at without taking away from their standard operating budgets.

A 5% UK levy on platforms generating more than £25 million in annual UK revenue could raise substantial funding for the UK's public interest media ecosystem. While YouTube's annual revenue figures for the UK are not public, the company's global annual revenue for 2025 totalled \$60 billion.⁹⁵ The figures vastly exceed Netflix's global annual revenue which totalled \$45 billion, and whose UK revenue in 2024 was estimated at £43 million, meaning that a 5% levy could generate an additional £2.15 million in a single year for a UK public interest content fund, with significantly higher figures expected from YouTube.

If established, the UK would not be the first jurisdiction to introduce such a fund. UK lawmakers might look to Canada's Online Streaming Act (2023) and France's Service de Media Audiovisuel a la Demande (SMAD, 2021), both of which legally require video-on-demand platforms to invest a percentage of their profit into cultural funds. For example, Canada's legislation requires online streaming companies generating more than CA\$25 million in annual Canadian revenues to contribute 5% of those revenues to government-designated media and audio funds.⁹⁶ Similarly, France's SMAD regime requires streaming services exceeding a €5 million annual revenue threshold to invest up to 20% of their French revenues in domestic and European productions.⁹⁷ The levies in Canada and France have successfully raised significant revenues for national media ecosystems. In France, the levy required Netflix, Prime Video and Disney+ to invest a combined €866 million in television and film production between mid-2021 and 2023.⁹⁸ In Canada, estimates suggest that the existing 5% contribution requirement could direct approximately CA\$2.19 billion towards Canadian cultural organisations and certified audiovisual productions by 2030.⁹⁹ For more comparative examples of prominence rules across global jurisdictions, see the Appendix of this report.

In the UK, a levy on platforms has already been proposed by the Culture, Media and Sport Committee. In their British Film and High End Television report, published in 2025, the CMS committee backed calls for streamers to pay 5% of their UK subscriber revenue into a cultural fund to help finance drama that has a specific interest to British audiences, saying:

93 British Film Institute.(2026). BFI Young Audiences Content Fund. <https://www.bfi.org.uk/get-funding-support/create-films-tv-or-new-formats-storytelling/young-audiences-content-fund>

94 Ibid.

95 McMahon, L. (2026, February 7). YouTube's \$60bn revenue revealed amid paid subscriber push. BBC News. <https://www.bbc.co.uk/news/articles/crkrkd2xlx6o>

96 Computer and Communications Industry Association. (2025). Canada's Requirement to Force U.S. Companies to Fund Local Music and Video Content Could Cost the U.S. Industry \$7 Billion by 2030. <https://ccianet.org/wp-content/uploads/2025/09/Cost-of-Canadas-Online-Streaming-Act.pdf>

97 Kahn, E. (2025). What the UK can learn from France's streamer regulations. Broadcast. <https://www.broadcastnow.co.uk/svod/what-the-uk-can-learn-from-frances-streamer-regulations/5203456.article>

98 Ibid.

99 Computer and Communications Industry Association. (2025). Canada's Requirement to Force U.S. Companies to Fund Local Music and Video Content Could Cost the U.S. Industry \$7 Billion by 2030. <https://ccianet.org/wp-content/uploads/2025/09/Cost-of-Canadas-Online-Streaming-Act.pdf>

“They need to step up their support for the making of culturally British content, not just reap the cultural and training benefits it provides. Ultimately, they should then benefit from a healthier supply of PSB-made shows that they can license for their platforms.”¹⁰⁰

In response, the government expressed hesitation over a levy on streamers because of concerns that it would impact inward investment.¹⁰¹ However, other parliamentarians, such as Dame Caroline Dinenage, have warned that “there will be countless distinctly British stories that never make it to our screens” unless the Government intervenes to “rebalance the playing field” between streamers and public service broadcasters.¹⁰²

Additionally, the proposal for a levy on streamers has received broad industry support. BECTU have argued that a platform levy could help achieve “a secure future for public sector broadcasting,”¹⁰³ while BBC Chair Samir Shah has also called for a streamer levy to generate additional funding for skills and training.¹⁰⁴ In a survey of UK and international screen professionals, over 80% of respondents backed the government’s proposed intervention, with more than 83% agreeing that the time to act is now.¹⁰⁵

Demos’ proposed Public Interest Media Content Fund differs in its design from the models outlined above, but it shares a central principle: platforms should be required to invest in public interest content. The proposal places particular emphasis on supporting innovation across the media sector, while also recognising the diversity of creators who could benefit from the fund, an issue repeatedly highlighted as a key concern throughout interviews for this paper. A Public Interest Media Content Fund would also complement the recently-established Local News Fund as part of the Local Media Action Plan, which will provide financial support for the local news industry to move towards a digital-first and sustainable future, with some funding reserved to support communities in local news deserts.¹⁰⁶

The proposed levy should not be viewed as a substitute for the UK’s broader public interest media landscape, which relies upon competition, commercial revenues and continued investment in high-quality content. Instead, it should operate as a targeted intervention in areas of persistent market failure, such as local news, children’s programming and public interest journalism, while complementing the need for a specific and sustainable long-term funding mechanism for the BBC and investment in media.

100 Culture, Media, Sport Committee, House of Commons. (2025). British film and high-end television: Government Response. <https://publications.parliament.uk/pa/cm5901/cmselect/cmcomeds/1123/report.html>

101 Ibid.

102 Roberts, H. (2025). Government needs to safeguard distinctly British content, says Culture Committee. The Standard. <https://www.standard.co.uk/showbiz/celebrity-news/british-government-bbc-netflix-andrew-matthews-b1221676.html>

103 Kahn, E. (2026). UK MPs call for “urgent action” on HETV tax credit and streamer levy. Broadcast. <https://www.broadcastnow.co.uk/home/uk-mps-call-for-urgent-action-on-hetv-tax-credit-and-streamer-levy/5203837.article>

104 Kahn, E. (2026). BBC chair: UK should be taxing US streamers. Broadcast. <https://www.broadcastnow.co.uk/bbc/bbc-chair-uk-should-be-taxing-us-streamers/5202784.article>

105 TVA Editor (2025). Survey shows significant level of support for streaming levy to save UK production industry. Television Asia Plus. <https://tva.onscreenasia.com/2025/04/survey-shows-significant-level-of-support-for-streaming-levy-to-save-uk-production-industry/>

106 Department for Culture, Media and Sport. (2026, March 17). Amplify: The Local Media Action Plan. GOV.UK. <https://www.gov.uk/government/publications/amplify-the-local-media-action-plan/amplify-the-local-media-action-plan>

RECOMMENDATION 3

5% levy on video-sharing platforms for a UK Public Interest Content Fund

The government should introduce a levy on video-sharing platforms to give 5% of their annual UK revenue to a Public Interest Content Fund for UK-produced audiovisual content. The levy would apply to video-sharing platforms with more than £25 million in annual UK revenue.

The Public Interest Content Fund would provide independent grant-funding to diverse UK media creators, including: PSBs, content creators, influencers, and independent media organisations. It would be facilitated by an independent body, and could be modelled after the Young Audiences Content Fund which was managed by the BFI.

2.2 ENABLERS FOR ACCOUNTABLE & DEMOCRATIC GOVERNANCE OF NEW PROMINENCE RULES

This section provides recommendations for implementing prominence rules in the platform environment that effectively safeguard against risks of capture and contribute to a more plural and independent media ecosystem. These recommendations are enablers and must be in place before implementing any further variations of a prominence proposal.

2.2.1 Co-regulatory and multi-stakeholder governance mechanisms

Given the risks of media or political capture that are outlined in the previous section, it is crucial that oversight of prominence regimes remains independent from state and the actors that would be subject to its rules. If processes for the prioritisation of content give states opportunities for disproportionate control, whether intentional or inadvertent, prominence rules can result in the state controlling citizens' access to information, effectively constituting propaganda. If processes for the prioritisation of content give commercial actors opportunities for disproportionate control, prominence rules can result in profit incentives being a driving factor in citizens' access to information. Both scenarios pose serious threats to media independence.

In order to address this, any advancements to the UK's prominence regimes in the platform environment should be governed by co-regulatory and multi-stakeholder mechanisms to safeguard against disproportionate influence from anti-democratic actors.

Co-regulation is a form of collaborative governance that enables the involvement of external actors in the regulatory process. This is particularly important for providing democratic underpinning to prominence frameworks because it would facilitate oversight and regulatory mechanisms that are independent from government, and therefore safeguard against charges of disproportionate government control.¹⁰⁷ Co-regulation is different from self-regulation because public authorities maintain a role during the rule-making process: typically, the government provides a general framework which is then substantiated by external actors. The involvement of public institutions guarantees a public scrutiny on the outcome of co-regulation; this should

¹⁰⁷ Vigna, F. (2022). Co-regulation Approach for Governing Big Data: Thoughts on Data Protection Law. In ACM International Conference Proceeding Series. <https://doi.org/10.1145/3560107.3560117>

ensure greater transparency, representation of public interests, and respect for fundamental rights.¹⁰⁸

Additionally, the co-regulatory body should be multi-stakeholder– comprising media industry professionals and civil society groups – to prevent single points of control and provide further resilience against capture by anti-democratic actors.¹⁰⁹

Appointments to the body would draw on existing appointments models, such as the Judicial Appointments Commission, to create an independent, professional and expertise-based board appointments process, fully independent of government influence or control, and would better insulate the body against disproportionate commercial control from the media industry.¹¹⁰

The governance of public interest news and press-related content has historically been politically and institutionally sensitive in the UK, with longstanding concerns about balancing accountability, media freedom and protection against state interference. For this reason, oversight of prominence rules should not simply be absorbed into Ofcom’s existing remit. Instead, the complexity and constitutional sensitivity of regulating decisions about news visibility and public interest journalism requires a distinct body with a specifically designed governance structure, rooted in civil society participation, plural representation and independence from both government and industry influence

Therefore, the co-regulatory and multi-stakeholder body would be a new body, separate from Ofcom, because it must be embedded in civil society and involve plural voices to ensure that the governance of the UK’s prominence rules are sufficiently accountable and democratic.

The body would oversee the implementation and ongoing governance of new prominence rules. The body would determine what content should be considered in the public interest, with decisions reviewed at regular intervals to ensure they remain responsive to a changing media environment. The body would be responsible for appeals processes regarding content prioritisation decisions (see Recommendation 5), and would undertake auditing and evaluation of prominence requirements to monitor how and whether public interest content has received sufficient prominence.

As Dr Damian Tambini, Senior Lecturer at the London School of Economics, stated:

“In order to protect them from the perception – and the reality – that they could be captured by government, decisions on what should be prominent should be taken by a co-regulatory multi-stakeholder body. This should be accountable to parliament and the public, and insulated from government control. This will ensure maximum transparency and oversight and avoid single points of control.”¹¹¹

108 Vigna, F. (2022). Co-regulation Approach for Governing Big Data: Thoughts on Data Protection Law. In ACM International Conference Proceeding Series. <https://doi.org/10.1145/3560107.3560117>

109 Council of Europe. (2021). Guidance Note on the Prioritisation of Public Interest Content Online. <https://rm.coe.int/cdmsi-2021-009-guidance-note-on-the-prioritisation-of-pi-content-e-ado/1680a524c4>

110 Padania, S., Perry, H., & Curtis, P. (2026, January). Our BBC: A blueprint for a more independent and future-proofed BBC. Demos. https://demos.co.uk/wp-content/uploads/2026/01/Our-BBC_Report_January-2026.pdf

111 Dr Damian Tambini, 15th May 2026

The co-regulatory body would also give members of the public greater democratic involvement in content prioritisation decisions: they should feed into decisions about what constitutes public interest news through deliberative processes. The body must be required to consider the results of a Citizen Assembly-style process before establishing definitions of public interest news to ensure they are rooted in public judgement.

Germany's Medienstaatsvertrag (MStV) (2020) or Interstate Media Treaty offers helpful precedent for this co-regulatory body's approach for determining which content should be deemed of public interest. The MStV's so-called 'public value procedure' requires state media authorities to review and publicly disclose the list of 'public value' content every three years, assessed against defined criteria including the extent of coverage of political and historical events, as well as regional and local information.¹¹² The periodical review of this list adds an additional layer of accountability to the oversight of the country's prominence regime, and also incentivises investment from media organisations in 'public interest' topics, particularly political or local reporting.

RECOMMENDATION 4

Co-regulatory and multi-stakeholder governance mechanisms

The government must enable the establishment of a new co-regulatory and multi-stakeholder body to oversee the UK's prominence regimes. The co-regulatory governance body would consist of media industry professionals and civil society, and would be entirely independent from government actors in order to safeguard media independence and prevent political capture.

The public will feed into the body's governance of prominence rules through deliberative inputs, such as on the definition of what constitutes public interest news.

The body would be responsible for:

- Overseeing the process for determining what content is deemed to be in the 'public interest' and therefore prioritised under prominence rules;
- Reviewing prioritisation decisions at regular intervals (e.g. every three years) to ensure they remain responsive to changing media environments;
- Holding responsibility for appeals processes that enable media industry and the public to contest content prioritisation processes;
- Publishing regular public reports on the processes and outcomes of the UK's prominence regime.

112 Die Medienanstalten. (2020). Interstate Media Treaty. https://www.die-medienanstalten.de/fileadmin/user_upload/Rechtsgrundlagen/Gesetze_Staatsvertraege/Interstate_Media_Treaty_en.pdf

2.2.2 Appeals processes

UK policymakers must ensure that updated rules for prioritising the discoverability of ‘public interest’ content on platforms are accompanied by robust appeals mechanisms, enabling both media organisations and the public to contest decisions relating to excessive or insufficient prominence, as well as content removal.

In the first instance, Ofcom should expedite the enforcement of its “temporary must carry” provision under the Online Safety Act which requires platforms to notify news publishers before removing or restricting access to their content and provide a right of appeal.¹¹³

In the longer-term, appeals opportunities must be incorporated into any future legislation on prominence, to ensure that decisions to increase the discoverability of ‘public interest’ content are sufficiently contestable and accountable for healthy democratic functioning. Appeals processes would be overseen by the newly-formed co-regulatory governance body that will oversee the UK’s prominence frameworks.

RECOMMENDATION 5

Appeals processes for contesting prioritisation outcomes

The government must ensure that prominence rules, whether those existing or developed in future, are accompanied by robust appeals opportunities for media organisations and the public to contest content prioritisation decisions on platforms.

- In the first instance, the government must ensure that “temporary must carry” provisions under the Online Safety Act are adequately enforced to enable OSA-defined news publishers to contest content deprioritisation and removal decisions.
- Any future rules on prominence must incorporate robust appeals processes for media organisations and the public. This role would be undertaken by the newly-formed co-regulatory body overseeing the governance of the UK’s prominence rules.

2.2.3 Algorithmic transparency and platform data access

Shortly after taking office in 2024, the Labour government moved to amend the Online Safety Act, introducing new powers to expand access to platform data. This represents an important step for platform accountability. However, an effective prominence regime will require further action on transparency and data access surrounding platforms’ content prioritisation processes.

Currently, recommender algorithms, the key mechanisms used by platforms to prioritise content, are widely described as “black boxes” by civil society researchers and technical experts alike – making it extremely challenging for users, researchers, media organisations, or regulators to understand how they work, and what their impacts are.^{114,115,116}

113 House of Lords Communications and Digital Committee. (2022). Government Response to the House of Lords Communications and Digital Committee Report on Media Plurality: News Ecosystem Dependencies Mapping. UK Parliament. <https://committees.parliament.uk/publications/46455/documents/237597/default/>.

114 Ruohonen, J. (2024). Mysterious and manipulative black boxes: A qualitative analysis of perceptions on recommender systems. First Monday, 29(6) <https://firstmonday.org/ojs/index.php/fm/article/view/13357/11634>

115 Sankaran, V. (2024). Researchers seek to unravel secrets of TikTok’s addictive algorithm. The Independent. <https://www.independent.co.uk/tech/tiktok-black-algorithm-box-study-b2534606.html>

116 Sun, H. (2024). The Right to Know Social Media Algorithms. 18 Harvard Law & Policy Review 1. <https://journals.law.harvard.edu/lpr/wp-content/uploads/sites/89/2024/08/18.1-Right-to-Know-Social-Media-Algorithms.pdf>

Tackling such opacity is a crucial first step in ensuring citizens are able to access information without interference; a key aspect of Article 19 freedom of expression rights. A growing body of academic research also suggests that greater transparency around recommender systems can deliver tangible benefits, including improved user satisfaction,¹¹⁷ increased public trust in platforms,¹¹⁸ and a reduction in privacy concerns.¹¹⁹

For media organisations, limited algorithmic transparency and restricted access to platform data have direct consequences for the discoverability of their content. In evidence submitted to Ofcom, various media organisations have highlighted that this opacity makes it extremely difficult to assess how algorithmic systems shape their news consumption journey.^{120,121} As the National Union of Journalists (NUJ) has noted: “Without knowing the factors that influence the prominence given to different news providers it is not possible to fully understand or evaluate the patterns, trends or impact.”¹²² Similarly, News UK shared similar concerns in their own submission to Ofcom.¹²³ Given that financial sustainability is closely tied to referral traffic from search rankings and social media feeds, media organisations are compelled to invest substantial resources in digital content strategy, audience engagement, and search engine optimisation.

The current data access regime under the Online Safety Act has yet to be finalised. However, its current proposed form is too narrow to provide adequate transparency for either the public or media organisations on content prioritisation processes: the scope of accessible data is largely confined to issues of online harm, limiting its relevance for understanding broader questions of visibility and discoverability; the definition of access for ‘researchers’ will likely be restricted to academic researchers which would exclude many media organisations; and finally, the regime does not yet provide access to key data on recommender algorithms, such as data input or parameters, which is critical insight for understanding content prioritisation processes.

As such, UK policymakers should extend existing platform transparency and data access rules under the Online Safety Act to ensure that diverse media organisations can access data on content prioritisation decisions, and better understand the impacts of platform design choices on the discoverability of their news content. More specifically, policymakers should include the following provisions on algorithmic transparency and platform data access:¹²⁴ public disclosure of recommender algorithm parameters, news publisher access to data and insights about content flows, and news publisher access to the latest recommender API. Taken together, these measures on transparency and platform data access would significantly strengthen the ability of independent experts and media organisations to evaluate the effects of platforms’ content prioritisation processes. In turn, such scrutiny would help guard against the risk of disproportionate influence from both state and commercial actors.

117 Gedikli, F., Jannach, D. and Ge, M. (2014). How Should I Explain? A Comparison of Different Explanation Types for Recommender Systems. *International Journal of Human-Computer Studies* 72(4), pp. 367–382. <https://doi.org/10.1016/j.ijhcs.2013.12.007>

118 Shin, D., Zaid, B., Biocca, F. and Rasul, A. (2022). In platforms we trust? Unlocking the black-box of news algorithms through interpretable AI’, *Journal of Broadcasting & Electronic Media*, 66(2), pp. 235–256. <https://doi.org/10.1108/INTR-02-2021-0087>

119 Ibid.

120 Ofcom. (2022). Media Plurality: News Ecosystem Dependencies Mapping. <https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/multi-sector/media-plurality/annex-8-conrad-report.pdf?v=328777>;

121 Tobitt, C. (2021). Ofcom Warns That Secret Tech Giant Algorithms May Be Bad for Media Plurality. *Press Gazette*. <https://pressgazette.co.uk/news/ofcom-warns-that-secret-tech-giant-algorithms-may-be-bad-for-media-plurality/>

122 National Union of Journalists. (2021). Response to Ofcom Consultation: The Future of Media Plurality in the UK. <https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-2-6-weeks/220700-the-future-of-media-plurality-in-the-uk/responses/national-union-of-journalists?v=200212>

123 News UK. (2021). Response to Ofcom Consultation: The Future of Media Plurality in the UK. <https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-2-6-weeks/220700-the-future-of-media-plurality-in-the-uk/responses/news-uk?v=200213>

124 Demos. (2025). Additional Safety Measures Consultation Response. <https://demos.co.uk/wp-content/uploads/2025/10/Demos-Additional-Safety-Measures-consultation-response.pdf>

RECOMMENDATION 6

Algorithmic transparency and platform data access

The government must broaden transparency and data access requirements on platforms under the Online Safety Act. The following legally-binding transparency requirements must be in place before the UK's prominence rules on platforms are updated to enable scrutiny of platform content prioritisation processes:

- **Public disclosure of recommender system parameters:** Platforms should be legally required to disclose the main parameters of their recommender algorithms, including input data and weightings.¹²⁵ Platforms should disclose the following input data: all sources of information used in rankings (e.g. whether the platforms use item content and metadata, engagement history, user survey data, quality feedback from users, annotations from raters, user settings, profile and social graph data, and context data such as day, time or location).¹²⁶ Any data from users would be anonymised or aggregated to ensure user privacy. Given that the parameters of recommender algorithms are regularly updated and tweaked by online platforms, these should be disclosed at regular intervals.¹²⁷
- **Access for news publishers to core platform insights on content flows:** Platforms should be required to disclose key insights and data about their content flows to recognised news publishers, as defined under the OSA. This would ensure that news organisations are able to understand the prevalence, viral dissemination and engagement of their media content on online platforms. Specifically, platforms should publish: a sample of the public content that is most highly disseminated on the platform and a sample of the public content that receives the highest engagement. This is particularly important around major incidents.¹²⁸
- **Access to recommender system interfaces:** Finally, platforms should be required to provide news publishers with access to the latest recommender API and/or create a safe data-sharing mechanism. This would enable media organisations to monitor trends in content flows in real-time, such as the impacts of recommender algorithms on the prioritisation of 'public interest' news content.

125 Cooper, A. and Chapman, P. (2025). Making Recommender Systems Work for People: Turning the DSA's Potential into Practice. DSA Observatory. <https://dsa-observatory.eu/2025/05/19/making-recommender-systems-work-for-people/>

126 Knight-Georgetown Institute. (2025). Better Feeds: Algorithms That Put People First – EU Policy Brief <https://kgi.georgetown.edu/wp-content/uploads/2025/03/Better-Feeds-EU-Policy-Brief-2025.pdf>

127 Ibid.

128 Amnesty International. (2025). UK: Technical Explainer on X's Recommender System and the 2024 Racist Riots. <https://www.amnesty.org/en/documents/eur45/0618/2025/en/>

2.2.4 Public understanding and support for the introduction of new prominence rules

An enhanced prominence regime, if introduced in a way that effectively prioritises media independence and pluralism, should demonstrate to the public that the government is prioritising their democratic empowerment. The policy's launch should emphasise that people's right to access to information, as a core part of their freedom of expression rights, is at the root of its design and roll-out.

However, the introduction of an upgraded prominence regime is not without its risk of backlash. In the last year, the introduction of regulation to online spaces has prompted concerns about infringements on public freedoms. For example, despite strong public support, the July 2025 enforcement of the Online Safety Act's provisions for children's safety in the online world, 'the Children's Codes', prompted strong criticism, accusations of 'censorship', and negative media coverage.¹²⁹ Similarly, in September 2025, the introduction of the digital ID regime with the stated aim of tackling illegal immigration also prompted criticism, missing an opportunity to build public understanding of the meaningful benefits such a policy would bring, and ultimately delaying its implementation.¹³⁰

Such examples demonstrate the importance of building a thorough evidence base of the public appetite for such a regime prior to its launch. Research must be used to inform approaches for building the public's understanding of the benefits this policy will bring for their access to information and democratic empowerment prior to its official launch and implementation.

RECOMMENDATION 7

Public awareness and opinion research to inform implementation

The government must conduct public research to inform the design of the launch and implementation of an enhanced prominence regime. Such research should include:

- Public awareness of the existing challenges surrounding the visibility and discoverability of PSB and news content.
- Public awareness of who and what currently determines what content they are exposed to online and attitudes towards the level of user choice currently available regarding the diversity and plurality of the content they are exposed to.
- Public attitudes towards the importance and value of PSB and news publisher content and of a diverse and pluralistic information diet for the public as a whole and their own individual information consumption
- Public attitudes towards the proposed changes an upgraded prominence regime would represent.

129 Carroll (2025) "Hundreds of thousands of people backlash against internet safety rules." <https://news.sky.com/story/hundreds-of-thousands-of-people-backlash-against-internet-safety-rules-13403603>

130 Chaplain et al (2025) "'Britcard digital ID facing major backlash from Labour and the public.'" https://inews.co.uk/news/politics/britcard-digital-id-facing-major-backlash-from-labour-3942182?srsId=AfmBOooBp0Ed-hPqno-GK5Kb_aBnDpwWLLn8jLPJepQXucev9ByPHTeF

CONCLUSION

Citizen access to public interest news information remains a cornerstone of democratic life. A healthy democracy depends on citizens being able to discover accurate, reliable, and plural news sources so they can develop informed opinions, participate in the public sphere, and exercise public accountability. But in the platform environment, incorrect, misleading, and inflammatory content abounds, while accurate and reliable news sources face declining visibility – with serious consequences for the very foundations of democratic life.

This paper has outlined that updating the UK's prominence framework is a necessary response to safeguard citizen access to public interest news. Originally developed to secure the visibility of public service broadcasting in a linear era, prominence rules must now be reconsidered in light of algorithmically curated feeds, video-sharing platforms and AI-mediated search. Extending existing prominence requirements to video-sharing platforms and social media feeds is therefore a logical next step for content prioritisation frameworks in the digital age.

However, the democratic benefits of prominence rules are contingent upon careful design, clear objectives, and strong democratic safeguards to protect against disproportionate influence over content prioritisation processes from state or corporate actors, and to prevent potential controversy. For this reason, the paper offers recommendations to UK policymakers at two levels: targeted interventions in the areas of PSB prominence on video-sharing platforms and news prominence on social media feeds, and the overarching enablers needed for democratically legitimate prominence frameworks

Citizen access to **public interest news information** remains a **cornerstone of democratic life.**

A **healthy democracy** depends on citizens being able to discover **accurate, reliable, and plural news sources** so they can develop informed opinions, participate in the public sphere, and **exercise public accountability.**



Firstly, the government should introduce new prominence requirements to rebalance citizen access to public interest news while supporting media independence and pluralism. To do so, the government should extend statutory prominence for PSB content of the highest civic value on video-sharing platforms. The government should also introduce new legislation for algorithmic prominence for public interest news sources on social media platforms that supports media plurality, based on parameters for trustworthy editorial workflows, procedural fairness, and transparency. However, prominence measures alone will not correct the market failure in public interest media provision, as platform incentives do not sufficiently support content with high democratic value. To alleviate funding challenges of the UK's public interest media ecosystem, the government should introduce a levy on platforms to generate revenue for a UK Public Interest Content Fund.

Secondly, the government should introduce enabling measures that embed accountable and democratic governance mechanisms into the UK's new prominence frameworks. The government should establish a new co-regulatory and multi-stakeholder body comprising media industry professionals and civil society to oversee prominence rules, with public input through deliberative processes at key stages. The government should also ensure effective appeals mechanisms and robust algorithmic transparency and platform data access measures. These enabling measures are not optional add-ons, but foundational guardrails that make prominence rules effective, accountable, and democratically legitimate.

Prominence rules are no “silver bullet” – they cannot alone resolve the deeper, structural challenges facing the information environment. However, if implemented effectively, and as part of a broader policy toolkit, they offer a pragmatic and proportionate step toward securing a more plural, independent and resilient information ecosystem.

APPENDIX

GLOBAL PRECEDENTS: MUST-CARRY RULES ACROSS INTERNATIONAL JURISDICTIONS

This section provides comparative examples of international prominence regimes as precedent-setting case studies. Such examples reflect a long history of ‘must carry’ legislation going back to 1965 in the US when the Federal Communications Commission (FCC) initially designed such rules to protect local broadcast television in the face of the expansion of cable TV services.^{131,132} Over time, similar rules have been adopted in other jurisdictions where they have typically focused on ensuring the carriage of public service broadcasting (PSB) content on television platforms.

UK PRECEDENTS: BROADCAST TELEVISION TO CONNECTED TVS

In the UK, “must-carry” rules were first introduced under Section 64 of the Communications Act 2003, which requires digital television services to carry the five main public service broadcasters (PSBs) - the BBC, ITV (Channel 3 services), Channel 4, Channel 5, and S4C.¹³³ The Act also empowers the Secretary of State to review and amend this list, in consultation with Ofcom and relevant stakeholders.

The must-carry rules from the Communications Act have been updated for limited contemporary digital media devices via the Media Act 2024 to include obligations for designated on-demand TV¹³⁴ – whereby internet TV platforms as designated by the Secretary of State must give prominence to BBC iPlayer and other PSB players as designated by Ofcom.¹³⁵ As of May 2026, however, no connected TV platforms had yet been designated by the Secretary of State, and Ofcom had not identified any PSB players for inclusion. A fuller assessment of the regime’s effectiveness will be possible once these provisions are fully implemented.¹³⁶

The Media Act also updated radio prominence rules to ensure that UK radio stations, particularly BBC stations and licensed commercial stations, remain easily accessible on smart speakers and connected audio devices, defined as Digital Radio Selection Services (DRSS). It guarantees that these stations can be accessed on request, including via voice-activated assistants such as

131 Federal Communications Commission. (2015). Cable Television. <https://www.fcc.gov/media/engineering/cable-television>

132 Must-Carry Rules 2024. (2024). The Free Speech Center. <https://firstamendment.mtsu.edu/article/must-carry-rules/>

133 Communications Act 2003. (2003). <https://www.legislation.gov.uk/ukpga/2003/21/contents>

134 Media Act 2024. (2024). <https://www.legislation.gov.uk/ukpga/2024/15/contents>

135 Ofcom. (2026). Prominence and Accessibility on Connected TV Platforms: Consultation on our draft Code of Practice and draft Guidance on the Agreement Objectives. <https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/197515-prominence-and-accessibility-on-connected-tv-platforms/main-docs/consultation---prominence-and-accessibility-on-connected-tv-platforms.pdf?v=410792>

136 Ibid.

Alexa. According to one expert interviewed for this paper, the decision to prioritise commercial radio stations alongside public broadcasters represented a pioneering step in extending the prominence regime beyond traditional means, and could be a lesson when looking at future policy decisions.

EU APPROACHES: OUTSTANDING UNCERTAINTIES ON PROMINENCE

At the EU level, the regulatory framework combines existing visibility requirements for European content with an upcoming review of the Audiovisual Media Services Directive that is expected to strengthen prominence rules and address the sustainability of the media sector. Article 114 of the European Electronic Communications Code (2018) states that member states may impose must-carry obligations for specified radio and television services that meet “general interest objectives,” as defined at the national level.¹³⁷ Similarly, Article 7a of the Audiovisual Media Services Directive (AVMSD) sets out provisions for “audiovisual media services of general interest,” while leaving the precise scope and implementation of these measures to individual member states.¹³⁸

Additionally, Article 13 requires providers of on-demand audiovisual media services to ensure that at least 30% of their content includes European content, although the clause does not currently include a clear definition of which services fall within scope of “on-demand” providers.¹³⁹

As part of the EU Commission’s commitments in the European Democracy Shield, the AVMSD will be reviewed in 2026.¹⁴⁰ The European Broadcast Union (EBU) had outlined key priority areas for the AVMSD revision, including: mandatory rules for the prominence of general interest media services across all relevant devices and platforms; and tackling harmful practices such as unfair revenue-sharing between platforms and media organisations to better support the financial sustainability of European media.¹⁴¹

AUSTRALIA: PROMINENCE UPDATES FOR LOCAL AND PUBLIC SERVICE BROADCASTERS

In Australia, prominence rules were originally introduced via the Broadcasting Services Act (1992) which was designed to promote Australian media content under a quota system. The Act requires commercial free-to-air TV licensees to broadcast at least 55% Australian programming between 6am and midnight on their primary channels.¹⁴²

Australia’s prominence rules have since been updated for digital media services via the Broadcasting Services (Minimum Prominence Requirements) Regulations (2024).¹⁴³ The Regulations require manufacturers of new smart TVs, media streaming devices and certain smart projectors and smart monitors to make local free-to-air services easier to find.¹⁴⁴ The framework

137 European Union. (2018). Directive (EU) 2018/1972 of the European Parliament and of the Council of 11 December 2018 establishing the European Electronic Communications Code (Recast). <https://eur-lex.europa.eu/eli/dir/2018/1972/oj/eng>

138 Ledger, M. (2023). Towards Coherent Rules on the Prominence of Media Content on Online Platforms and Digital Devices. CERRE. https://cerre.eu/wp-content/uploads/2023/12/CERRE_Prominence-of-Media-Content_Issue-Paper.pdf

139 UK legislation (2020). Directive 2010/13/EU of the European Parliament and of the Council. <https://www.legislation.gov.uk/eudr/2010/13/article/13>

140 European Commission. (2018). Revision of the Audiovisual Media Services Directive - AVMSD. <https://digital-strategy.ec.europa.eu/en/policies/revision-avmsd>

141 European Broadcasting Union. (2026). EBU Says “Policymakers Must Be Decisive in Promoting Europe’s Media Sector in the Revision of the AVMSD”. <https://www.ebu.ch/news/2026/04/ebu-says-policymakers-must-be-decisive-in-promoting-europe-s-media-sector-in-the-revision-of-the-avmsd>

142 Broadcasting Services Act. (1992). Commonwealth Consolidated Acts. https://www.austlii.edu.au/cgi-bin/viewdb/au/legis/cth/consol_act/bsa1992214/

143 Broadcasting Services (Minimum Prominence Requirements) Regulations 2024. (2024). Australian Government. <https://www.infrastructure.gov.au/sites/default/files/documents/I23ZB246.v17.pdf>

144 Australian Communications and Media Authority. (2024). Australia’s TV prominence framework. <https://www.acma.gov.au/australias-tv-prominence-framework>

is aimed at keeping local broadcasters and public service media visible amidst dominant global streaming apps, and has been welcomed by the Australian Broadcasting Corporation and the Special Broadcaster Service. However, these rules do not apply to TVs already in households, meaning it will take several years for the impact to be realised, a limitation that industry figures have described as a “missed opportunity.”¹⁴⁵

CANADA: REGULATING PROMINENCE ON STREAMING SERVICES

Canada’s must-carry framework has undergone the most significant modernisation among global regulatory prominence regimes. The Broadcasting Act (1991) allowed the Canadian Radio-television and Telecommunications Commission to require cable and satellite companies to carry specific channels including local television stations, Indigenous services, and French-language services outside Quebec.¹⁴⁶ More recently, the Online Streaming Act (2023) extended the scope of the Broadcasting Act to online streaming services (both video and audio), requiring designated platforms to ensure Canadian programming is discoverable and to promote or recommend Canadian content through their algorithms and user interfaces.¹⁴⁷

Additionally, the Act requires online streaming services that earn at least CA\$ 25 million or more in annual Canadian contributions revenues to provide financial support for Canadian and Indigenous content. These streaming services must contribute at least 5% of their previous year’s eligible Canadian revenues to support Canadian and Indigenous content and broadcasting activities.¹⁴⁸ Contributions are distributed across a range of industry funds, including the Canada Media Fund, the Independent Local News Fund, the Indigenous Screen Office Fund, and others supporting diverse and minority-language communities.¹⁴⁹ At present, the streaming services required to contribute financially include Netflix, Amazon Prime Video, Disney+, Apple TV+, Paramount+.

FRANCE: AGENDA-SETTING APPROACHES TO FAIR COMPENSATION

France’s prominence rules are another example that have undergone significant modernisation in response to the platform environment, and may offer useful precedent for UK policymakers.

In France, prominence requirements were first introduced under the General Broadcasting Law (1986) for “general interest services”. These are defined in legislation as public service broadcasters, including channels from France Télévisions (such as France 2, 3, 4, and 5) as well as Arte, TV5 Monde, and La Chaîne Parlementaire, alongside local public channels.

More recently, France has introduced the SMAD (Services de Médias Audiovisuels à la Demande 2021), transposing the requirements set out in the EU’s Audiovisual Media Services Directive (AVMSD) into French law for on-demand audiovisual media services.¹⁵⁰ Platforms that fall within scope of the SMAD – which include Netflix, Disney+, and Amazon Prime Video – are required to ensure that at least 30% of their catalogue works are European, with appropriate prominence given to such content. Additionally, SMAD providers must contribute around 20-25% of their French turnover to financing European and French audiovisual and cinema production, with a significant share directed towards French-language works and a portion allocated to independent producers.

145 Public Media Alliance. (2024). Australia passes prominence and anti-siphoning laws. <https://www.publicmediaalliance.org/australia-passes-prominence-and-anti-siphoning-laws/>

146 Broadcasting Act S.C., c. 11 (1991). Government of Canada. <https://laws-lois.justice.gc.ca/eng/acts/b-9.01/FullText.html>

147 Online Streaming Act. (2023). Government of Canada. https://laws-lois.justice.gc.ca/eng/AnnualStatutes/2023_8/page-1.html

148 Broadcasting Regulatory Policy CRTC 2024-121. (2024). Canadian Radio-television and Telecommunications Commission. <https://crtc.gc.ca/eng/archive/2024/2024-121.htm>

149 Ibid.

150 French Republic. (2021). Decree No. 2021-793 of 22 June 2021 relating to on-demand audiovisual media services. <https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000043688681>

International precedent shows a clear pattern: large platforms are increasingly required not only to carry or surface public interest content, but also to reinvest a portion of their revenues into supporting its production and visibility. This type of obligation does not currently exist in the UK, but it could provide a strong foundation for the development of a future prominence regime if policymakers were to look at their global counterparts.

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