15 WHITEHALL, LONDON, SW1A 2DD. 020 3878 3955
hello@demos.co.uk, www.demos.co.uk

EPISTEMIC SECURITY BRIEFING

BOOSTING PROMINENCE OF PUBLIC INTEREST NEWS FAQ

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1. What are prominence or 'must carry' rules?

In the UK, prominence rules have long underpinned the visibility and accessibility of public service broadcasting on traditional linear television. The rules ensure that public service broadcasters such as the BBC, ITV, Channel 4 and Channel 5 occupy the most accessible and visible positions on electronic programme guides (EPGs), so that audiences can easily find trusted public service content.

Alongside this, 'must-carry' rules have required certain television and communications platform operators to carry designated broadcast and radio services, whether public service or local broadcasters. While must-carry rules focus on ensuring availability i.e. they *can* be found, prominence rules focus on ensuring discoverability i.e. they are very obviously visible.

More broadly, prominence rules create obligations on platforms to make certain types of content more visible and accessible to audiences across media environments. Historically this has meant channel placement on broadcast television, but increasingly the debate concerns the responsibilities of connected devices and large online platforms, whose algorithms and commercial incentives now play a central role in determining what information audiences see.

2. How has the debate on 'prominence' in the UK evolved?

In the UK, debates on prominence have evolved from a focus on ensuring the visibility of public service broadcasting on traditional television services to questions about how public interest news content can remain discoverable in digital environments.

This shift has been shaped by several key developments:

- The adoption of the Media Act (2024), which extended prominence and must-carry obligations beyond traditional broadcast services to connected TVs and smart radios.
- The House of Lords' Future of News report (2024), which highlighted the need to consider how trusted news can achieve greater prominence on social media platforms.
- Ofcom's Transmission Critical report (2025), which examined the importance of ensuring prominence for public service broadcasting news and children's content on video-sharing platforms such as YouTube.

- Demos' Fairer Feeds report (2026), which builds on this debate by advocating for statutory prominence for public service broadcasters on video-sharing platforms and for 'public interest news' on social media platforms.

- Watch this space: a new strategic direction for UK media - green paper (2026), which proposes ways to bring prominence rules into the digital age. The green paper explores ways to require large online platforms to make "trustworthy news" more prominent. The green paper does not yet clarify what "trusted news" means or who determines it. The green paper also proposes prominence for public service media on video-sharing platforms, and potentially also national and local news publishers on social media. The public consultation seeks input on these questions.

Together, these developments reflect a broader recognition that the mechanisms determining what information citizens encounter have shifted from traditional channel listings to platform feeds, recommendations and search systems.

3. What challenges does prominence seek to address?

In the platform environment, reforms to prominence rules are typically proposed to address two challenges:

- Improving citizen access to public interest news information, and the democratic benefits that flow from it, including informed civic participation and greater resilience to mis- and disinformation.
- Addressing the financial pressures facing news publishers and public interest journalism.

Citizen access to public interest news:

Prominence reforms are proposed as mechanisms for giving greater visibility to content deemed in the public interest in the digital environments where people increasingly spend their time.[1] Social media feeds, search engines and recommendation systems now play a significant role in determining what information people encounter. However, these systems – which are largely owned and operated by US Big Tech companies, often without meaningful transparency or accountability – do not always prioritise or even ensure inclusion of accurate, reliable, locally-relevant or public interest news content. As such, prominence is proposed as a way of resolving this issue, by requiring platforms to prioritise 'public interest news' information within their recommendation systems.

Financial sustainability of news organisations:

Prominence reforms are also proposed as mechanisms for addressing some of the financial challenges facing the news industry resulting from a decline in web referral traffic.[2] By increasing the visibility and discoverability of news content, prominence reforms could bring revenue through increased engagement and reach, which can subsequently be monetising through

[1] In 2026, 40% of UK adults cited social media as their main source of news. Over the last 12 years, television news audiences have fallen from 79% to 47%, while print news consumption has declined from 59% to 12%. In 2026, YouTube overtook the BBC on audience reach, with BARB figures showing YouTube reaching 51.9 million people per month compared with 50.8 million for the BBC.
[2] Between 2018 and 2023, Facebook referral traffic to news publishers fell by between 40% and 55%, while from 2022-23, referrals from X declined by 20% to 48% depending on the news publishers. See: Digiday. (2023)https://digiday.com/media/publishers-reckon-with-declining-facebook-referral-traffic-as-the-platform-pulls-away-from-news/

advertising and subscriptions. However, there has been significant pushback from the media industry on the financial benefit of prominence, with concerns that there will be 'winners and losers'. While prominence would bring financial benefit for those media providers selected for prioritisation, it would commercially disadvantage those who are not prioritised.

While these two objectives are closely connected, they are not identical, and are often achieved by slightly different focuses in implementing the policy. Prominence rules designed to improve citizen access to information may differ in important ways from those intended primarily to deliver financial benefits to media organisations. Both goals are important and can reinforce one another. However, Demos research and policy work has emphasised that citizen access to public interest news information should be the guiding principle for any reform of the prominence rules.

Additionally, prominence should not be viewed as the single solution to the varying and complex challenges facing the contemporary media environment. Even if implemented effectively, prominence updates must be complemented by a range of legal and policy interventions to reflect a cohesive and balanced reform agenda. This agenda should 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.

4. News prominence on social media

4.1 What is Demos recommending for updating prominence rules on social media?

The shift from broadcast television towards digital platforms, social media, streaming, and AI services has fundamentally changed how citizens access news and other information, while placing increasing power over what people see and discover in the hands of a small number of technology companies. Historically, decisions about what information reached the public were made within a more plural and financially-sustainable media system. Today, platforms increasingly sit between citizens and the information they consume. Their recommender systems and other content prioritisation mechanisms make consequential decisions about the visibility of information, but these decisions are largely opaque and subject to limited accountability.

This is why Demos supports updating prominence rules for a digital age if they are implemented effectively. Prominence is not simply about making certain content easier to find, it is about making a choice about who decides what information people receive and introducing more accountability. There are important arguments against giving governments powers over the information citizens see. Governments shouldn't dictate our newsfeeds but we need a more democratic route, with appropriate safeguards, to ensure the information we have reflects the information we need, as decided by us not unaccountable commercial companies. Information is currently being controlled, but by barely regulated algorithms of unaccountable platforms that do not represent citizens' best interests. Well-designed prominence rules, with safeguards, could help rebalance that relationship by ensuring that reliable, public interest news information has a meaningful opportunity to reach citizens. For all of these reasons, we support introducing a new regulatory framework around prominence, including extending prominence to the platform environment. But any new regime must be carefully designed. It should:

1. Increase the visibility of public interest news - rather than attempt to determine which information is simply "trustworthy" according to subjective audience perceptions. A

'public interest news' definition should be developed independently of the government, with input from diverse media organisations, civil society, and the public. The definition should rely on independently-verifiable criteria pertaining to robust editorial standards and workflows.

2. Preserve media independence and pluralism - avoiding a situation in which the government replaces technology platforms as the actor determining which voices citizens encounter. This is critical to any future prominence regime and without all the necessary safeguards, these proposals will fail because they will not be supported by the industry they seek to support. Democratic safeguards should include co-regulatory governance mechanisms, robust appeals mechanisms for both news providers and members of the public to contest content prioritisation decisions, alongside legally-binding transparency requirements for platforms.
3. Be developed through robust consultation processes and public participation. The 'public interest news' definition and governance arrangements should be developed through extensive consultation with diverse media organisations, civil society, experts and the public. The government should also establish public understanding of how recommendation systems currently shape citizens' access to information and gather evidence on attitudes towards proposed changes. These are essential pre-conditions for establishing a new prominence regime that has democratic legitimacy.

4.2 What is co-regulation?

Co-regulation is a model of collaborative governance that shares responsibility between regulator(s), diverse sectors of the media industry, and other experts. It is seen as an alternative to self-regulation (which may be limited in terms of effectiveness, enforcement, and compliance) and statutory regulation (which is limited by a lack of independence from the state).[3] Specifically for a prominence regime, co-regulation is a valuable governance mechanism because it would avoid excessive government control over decisions about which content should be prioritised. An issue that is crucial for the continuation of a free and plural press.

In the UK, a number of different approaches to co-regulation have already been used. For example, the Association for Television on Demand (2009-2015), which was designated by Ofcom to regulate VOD services, but whose designation was subsequently withdrawn when Ofcom regulatory oversight moved back in house. A second example is the Advertising Standards Authority (ASA) which has been designated by Ofcom as co-regulator for broadcast advertising content, while Ofcom as the statutory regulator holds the ultimate legal backstop.

Internationally, approaches to co-regulation have included: the Council for Ethical Journalism (CDJ) in Belgium which is formally recognised through legislation, but prioritises industry self-regulation and is composed of journalists, editors, media organisations and representatives of

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[3] Council of Europe. (2017). *European Co-regulation Practices in the Media*. https://rm.coe.int/european-co-regulation-practices-in-the-media/16808c9c74

civil society.[4] In this example, the state retains a regulatory role where self-regulation is insufficient - for example, in cases of repeated violations.[5]

These UK and international precedents could serve as exemplary approaches to co-regulation for a body to perform regulatory oversight of the UK's prominence rules for 'public interest news' on social media.

As part of Demos' proposals, we have outlined the principles and key phases that could be considered to establish a coregulatory body designed to oversee a prominence regime that has sufficient independence from government. The following principles and phases are intended as starting points and are offered for illustrative purposes only. They should not be read as a definitive blueprint. Further work, led by engagement with experts, industry and the public will help draw out an exact model needed for a prominence regime.

Effective co-regulation of prominence for 'public interest news' will be contingent on several underlying principles running throughout the different phases of the body's lifecycle (outlined further below). Broadly, these principles are:

- Thorough engagement with experts, industry and the public
- Diverse participation in decision-making
- Openness
- Robust transparency and accountability mechanisms
- Regular review

These principles have been drawn in part from the European Commission's *Principles for Better Self- and Co-Regulation* (2013).[6]

The different phases of the co-regulatory body's lifecycle could be:

Phase 0: Additional engagement surrounding the specific proposals for the prominence regime

Importantly, we believe that for this regime and its co-regulatory body to be grounded in public legitimacy, the government must first 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 prior to the creation of the body. Such research should include 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. It should also include research into public attitudes towards the proposed changes an upgraded prominence regime would represent.

This phase should also include additional engagement with diverse sectors of the media industry concerning the final specific proposals for the prominence regime. Alongside public legitimacy, the efficacy of a new prominence system will be contingent on the support of the diverse public interest news publishers it seeks to benefit. This engagement should seek to engage as many

[4] Régulation. (2023). *En filigrane du contrat de confiance entre journalistes, médias et citoyens, le Conseil de déontologie journalistique (CDJ).* https://regulation.be/2023/03/10/en-filigrane-du-contrat-de-confiance-entre-journalistes-medias-et-citoyens-le-conseil-de-deontologie-journalistique-cdj/
[5] Ibid.
[6] These factors draw in part on the European Commission's 'Principles for Better Self- and Co-Regulation' (2013). See: https://digital-strategy.ec.europa.eu/en/news/principles-better-self-and-co-regulation-and-establishment-community-practice

sectors of the news industry as possible (including: local and regional publishers, independent media, and content creators).

Phase 1: Parliament creates the legal framework for a co-regulatory designation and certification mechanism

- There are various ways a prominence regime could share responsibility between regulators, media industry, and civil society'. One option, drawing on UK-based examples, would be to use Ofcom as a legal backstop for a designated coregulatory body.[7] This would allow the body to act as an independent, designated co-regulator, while Ofcom retains ultimate legal backstop and can step in should a platform not comply.
- The framework would establish criteria requiring the body to have adequate financial resources to perform its functions effectively, and to be sufficiently independent of platforms and media..
- Rather than enshrining a fixed definition of 'public interest news' in law, this phase would instead give the co-regulatory body a statutory power to certify news providers as meeting criteria that the body itself publishes and may revise over time. This preserves the flexibility for the definition and certification parameters to evolve as the media landscape changes, without requiring Parliament to legislate afresh each time.

The legislation should:

- Place a duty on platforms to give prominence to news providers certified by the co-regulatory body, so the certification has practical effect rather than remaining advisory.
- Include robust algorithmic transparency requirements, enabling the co-regulatory body (and, where appropriate, researchers, news providers, and the public) to scrutinise how platforms are implementing prominence obligations in practice.[8]
- Give the co-regulatory body powers to scrutinise and investigate platforms that fail to give prominence to certified news providers, with clear consequences for non-compliance, ensuring the requirements are enforceable.
- Require the body to publish and maintain its certification criteria and any subsequent revisions.
- Introduce robust appeals processes: prominence rules should allow media organisations and members of the public to challenge prioritisation decisions by platforms relating to excessive or insufficient prominence, as well as content removal. These must be legally binding to ensure there is accountability on the platforms.

Phase 2: Establishment of an independent appointments process for the co-regulatory body's board

- There are a range of models that could be drawn on to appoint the co-regulatory body's board via an open, merit-based public appointments process, rather than through direct ministerial selection. Demos' proposals for BBC governance reform offer one useful reference point. The proposals explored options such as an arm's-length appointments body that recruits against published skills and competency criteria alongside

[7] This legal framework has been pursued in the UK for the establishment of ATVOD, for which an amendment to the Communications Act (2003) provided that Ofcom could designate another body as the regulatory authority for specified parts of the On-Demand Programme Services (ODPS) regime.
[8] Lyall, S., & Moores, A. (2026). Fairer Feeds: Public interest news, prominence rules, and the future of discoverability on platforms. Demos. https://demos.co.uk/wp-content/uploads/2026/06/Media-Prominence_Report_2026.pdf

pre-appointment scrutiny of senior nominees by a relevant parliamentary select committee.[9] The proposals in Demos' BBC paper illustrate the kinds of mechanisms available for insulating appointments from excessive political or industry control while retaining public accountability. However, the precise design should be worked through separately rather than prescribed here.

- Whatever mechanism is chosen, it should require demonstrable independence from the platforms being regulated and from government, alongside relevant sector expertise (for example, media, technology, law, or civil society experience). It is also vital that a board represents the diverse sectors of the media industry.

Phase 3: Development of the co-regulatory body's governance mechanisms

- This phase would be progressed via thorough consultation processes to determine the body's day-to-day regulatory roles and responsibilities.
- Consultation with experts would include roundtables with diverse representatives of the media sector and civil society (including for example: local and regional publishers, independent media, content creators, civic media groups, cooperative newsrooms, and participatory media projects). It would also include an open form.
- Consultation with the public could include, for example: nationally-representative polling, deliberative workshops, alongside the more typical open form.
- The development of the body's governance mechanisms should be openly-prepared, widely publicised, and easily accessible.
- Participation in the governance of the co-regulatory body from diverse representatives of the media sector and civil society will be fundamental for the credibility and effectiveness of the system (including, for example: local and regional publishers, independent media, content creators, civic media groups, cooperative newsrooms, and participatory media projects). It will be vital that no representative of government will be a part of the membership in order to safeguard independence.

Phase 4: Development of a 'Public Interest News' definition and certification parameters

- Developing a definition of 'public interest news' will be one of the defining challenges facing the new body. This definition will underpin all work that follows, so it is vital that it is developed with strong support from both those it governs and those it is designed to benefit.
- This phase should be progressed with expert consultation, which could include roundtables with diverse representatives of the media sector and civil society (for example: local and regional publishers, independent media, content creators, civic media groups, cooperative newsrooms, and participatory media projects), alongside an open forum for wider submissions.
- The body must then turn to public consultation, which would include, for example: nationally representative polling and deliberative workshops, alongside the more typical open forum. Public input is essential to guard against the definition being shaped predominantly by the interests of those already best resourced to participate in expert consultation.

[9] Perry, H., Padania, S., & Curtis, P. (2026). Your BBC. Demos. https://demos.co.uk/wp-content/uploads/2026/03/BBC-Submission_2026_March.pdf

- This definition will form the basis for the parameters against which news providers self-certify their eligibility for prominence, with the coregulatory body responsible for checking these parameters are being applied correctly.

Phase 5: (Following launch and a period of implementation of the regime) Evaluation and review

- The media landscape, platform business models, and the ways audiences discover and consume news will continue to evolve, so the 'public interest news' definition and its parameters cannot be fixed permanently at the point of Phase 4. The co-regulatory body should therefore review and, where necessary revise, the definition at regular intervals, to ensure it remains fit for a changing environment - aligned with the review cycle proposed for selection processes more broadly (such as Germany's three-yearly 'public value' determination under the Interstate Media Treaty, though this is one possible model among several review cadences the body could consider).
- This review would not replicate the full consultation process set out in Phase 4, since the underlying framework and methodology would already be established; rather, it is intended to test whether the existing definition still reflects a changing media environment, and to make targeted adjustments where it does not.
- To uphold principles of transparency and accountability, the body would be required to undertake quarterly reporting and an annual statement against performance indicators and content prioritisation outcomes that are made public.

4.4 What democratic safeguards need to be in place?

Any prominence regime must be accompanied by the following safeguards to mitigate risks that the system is captured by any single actor or interest:

- Robust appeals processes: prominence rules should allow media organisations and members of the public to challenge prioritisation decisions by platforms relating to excessive or insufficient prominence, as well as content removal. Appeals processes should be overseen and mediated by the co-regulatory governance body.

- Meaningful transparency measures: transparency measures should place legally-binding requirements on platforms to publicly disclose recommender system parameters, provide access to core platform insights on content flows for news publishers, and provide access to recommender APIs or create safe data-sharing mechanisms for news providers. These measures will enable the public and news publishers to adequately scrutinise platform content prioritisation processes and effectively evaluate the impacts on the visibility of public interest journalism.

4.5 How would prominence work in practice?

Algorithmic prominence of 'public interest news' sources on social media feeds could be achieved through a parameter-based approach by integrating signals for 'public interest news' into platform recommendation systems.

The *Journalism Trust Initiative* by Reporters Without Borders (RSF) serves as a valuable technical precedent for a parameter-based approach. The JTI standard has 130 signals for determining a newsroom's practices, including: editorial independence, accuracy and fact-checking procedures, accountability and corrections, professional ethics, transparency of ownership and funding, diversity and inclusion policies, and audience engagement processes. Through a parameter-based approach, these signals can then be integrated into the ranking, recommendation, and content discovery systems on online platforms to increase the visibility of JTI-accredited news providers. So far, the approach has been backed by 2,400 media outlets in 127 countries.

4.6 How to reach a 'public interest news' definition?

At Demos, we have called for news prominence on social media to be rooted in definitions for 'public interest news', provided the definition is independently-developed by diverse sectors of the media industry, civil society, and the public.[10] Prominence for an effectively-developed 'public interest news' definition would give greater visibility to news providers for whom there is verifiable evidence that they consistently meet appropriate editorial standards, or additional public interest duties.

As an indication for the types of criteria that a 'public interest news' definition might involve, we have previously called for a definition that includes news providers who can give assurance of responsibility and accountability through effective systems of editorial oversight, complaints handling, and independent scrutiny. These might include: adequate editorial guidelines, standards and procedures in place to promote the publication of accurate and reliable information; processes in place for feedback, complaints, and appeals after publication; governance, ownership, and revenue structures that are transparent, accountable, and responsive to the public. Crucially, the definition must not be limited to legacy news, but allow for the inclusion of local and regional publishers, independent media, content creators, civic media groups, cooperative newsrooms, and participatory media projects.

We do not believe that 'trustworthiness' should be the criterion for giving news content greater visibility on social media because 'trustworthiness' can rely on loose definitions that tend to be rooted in subjective audience experiences. This is not a rejection of accountability or reliability as underlying principles for prominence rules. It is a rejection of *audience-perception-based* trust as the operative metric for determining which news providers receive prioritisation.

There is an important distinction between asking audiences whether they trust a publisher, and assessing whether a publisher has independently verifiable structures in place that make trustworthy journalism more likely. The former (i.e. asking audiences whether they trust a publisher) is subjective and is vulnerable to partisan skew or political context, the volume of media criticism they are exposed to (which may be strategically targeted by political actors to undermine certain channels), and the accumulated brand recognition of legacy incumbents.[11] [12] The latter (i.e. assessing whether a news provider has independently verifiable structures in place) is a set of auditable governance facts: does an editorial code exist, is there a functioning complaints process, is ownership transparent, that can, in principle, be demonstrated by any news provider regardless of size, age, or audience perception. For example, a digital-first outlet founded last

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[10] Demos (2026). Fairer feeds: Public interest news, prominence rules, and the future of discoverability on platforms. Demos.
https://demos.co.uk/research/fairer-feeds-public-interest-news-prominence-rules-and-the-future-of-discoverability-on-platforms/
[11] Nielsen, R. K., & Fletcher, R. (2024). *Public perspectives on trust in news*. Reuters Institute for the Study of Journalism. https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2024/public-perspectives-trust-news
[12] Johnson, P. (2024). *Trust is not a "useless metric" - we just need to understand it better*. Journalism.co.uk. https://www.journalism.co.uk/trust-is-not-monolithic-it-requires-nuance-and-an-understanding-of-vulnerability/

year can satisfy process-based criteria as readily as a century-old newspaper; it cannot straightforwardly out-compete that newspaper on accumulated audience trust. The 'public interest news' definition proposed above would therefore be built on the latter, process-based approach, precisely in order to avoid reproducing the incumbency bias that a trust-based metric would create.

Additionally, the Online Safety Act's 'Recognised News Publisher' definition is unfit for the purpose of prioritising 'public interest news'. The definition is too broad and could result in prominence being given to news providers who frequently publish information that is not in the public interest (i.e. false, misleading, or hateful). The definition allows publishers to satisfy the 'standards code' and complaints-handling requirements largely through self-declaration, with no independent verification. This was raised during the Bill's passage through the House of Lords, where peers warned the exemption could allow "extremist" or "harmful" publishers to exploit vague criteria, and that it left both platforms and Ofcom in a difficult position when assessing whether outlets genuinely met the standard.[13]

Finally, the 'public interest news' definition should not be treated as fixed at conception. Media models and formats continue to evolve and a definition frozen at a single point in time risks becoming outdated or, worse, an unintended barrier to legitimate new entrants who do not resemble the publisher types envisaged at launch. The co-regulatory body should therefore review and, where necessary, revise the definition at regular intervals, aligned with the review cycle proposed for selection processes more broadly (such as Germany's three-yearly 'public value' determination under the Interstate Media Treaty, though this is one possible model among several review cadences the body could consider). This review would not replicate the full consultation process needed to create the original definition, since the underlying framework and methodology would already be established; rather, it is intended to test whether the existing definition still reflects a changing media environment, and to make targeted adjustments where it does not.

5. Prominence for video-sharing platforms

5.1 What is Demos recommending for updating prominence rules on video-sharing platforms?

At Demos, we are calling for the government to create a new regime requiring video-sharing platforms to give prominence to PSB content of 'highest civic value' on video-sharing platforms through measures to increase algorithmic prominence, or user interface design. Video-sharing platforms host user-uploaded content or third-party video content but do not have editorial responsibility for the content (i.e. YouTube or TikTok). They are distinct from Video-on-Demand platforms which choose and control their catalogues and hold editorial responsibility (i.e. Netflix or Disney+).

These prominence measures will extend existing requirements for PSB prominence under the Media Act (2024) into the platform environment, representing a logical next step as audiences

[13] Online Safety Bill, House of Lords, Committee Stage debate, 23 May 2023, Hansard, columns as per the debate on Amendments 124, 126, and 227 to Clause 50 (recognised news publishers). Available at: https://hansard.parliament.uk/lords/2023-05-23/debates/76E93B6E-EE2A-4307-8FDB-3DF78F0526BF/OnlineSafetyBill

increasingly access public service content through online services rather than traditional broadcast channels.

When determining which news 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, when PSBs operate according to their fundamental principles – of accountability, accessibility, impartiality, pluralism, reliability, and universalism – they carry democratic value and major public benefit in terms of their provision of accurate and reliable news.[14] Despite public viewing habits increasingly moving towards platform-mediated information, PSBs still remain the most used and trusted sources of news for UK audiences.[15] Crucially, PSBs provide public interest news 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.[16]

To support media plurality and independence, it is essential that any measures to enhance the prominence of public service broadcaster content are introduced with strong safeguards to prevent undue government or commercial influence (see Question 4).

5.2 Should there be new legislation introduced or should this be left for the platforms to decide via voluntary agreements?

Prominence for PSB content on video-sharing platforms should not be left solely to voluntary agreements with platforms. Voluntary agreements, as business-to-business agreements, are not subject to external scrutiny, lack meaningful mechanisms for oversight or enforcement and operate without public interest tests. Importantly, they risk reinforcing the unequal bargaining power between platforms and PSBs. While platforms have an important role to play in improving the visibility of public interest information, voluntary approaches do not provide sufficient guarantees that citizen access to public interest information will be prioritised.

Historically, prominence rules have recognised that access to public interest content is too important to be determined solely by market incentives. As audiences increasingly rely on digital platforms for news and information, similar principles should apply to the systems that shape what people discover online, including feeds, recommendations and search rankings.

New legislation should establish a clear framework of obligations and safeguards. This should include requirements for transparency, independent oversight, researcher access and appeals processes, ensuring that prominence decisions can be scrutinised and held accountable.

[14] Demos. (2026). *Our BBC: A blueprint for a more independent and future-proofed BBC.* https://demos.co.uk/wp-content/uploads/2026/01/Our-BBC_Report_January-2026.pdf
[15] Ofcom. (2025). Public Service Media Review. https://www.ofcom.org.uk/tv-radio-and-on-demand/public-service-broadcasting/publicservice-media-review
[16] Ofcom. (2025). Public Service Media Review. https://www.ofcom.org.uk/tv-radio-and-on-demand/public-service-broadcasting/publicservice-media-review

Platforms should therefore have a role in delivering prominence, but within a regulatory framework that ensures decisions about the visibility of public interest information are made in the public interest, rather than solely according to commercial priorities.

4. What is Demos recommending for a 5% levy on video-sharing platforms?

As outlined in Q3, the current business model of platforms enables the extraction of significant financial revenue from public interest news content. However, prominence updates alone cannot resolve the financial challenges facing public service broadcasters and the broader public interest news landscape. As such, the government should introduce a levy as an accompanying measure to ensure that platforms fairly compensate public interest news content providers for the value they have extracted from their content.

More specifically, Demos recommends that video-sharing platforms contribute **5% of their UK revenues** to a dedicated **UK Public Interest Content Fund** supporting UK public interest audiovisual media content. The levy would apply to video-sharing platforms exceeding a specified annual UK revenue threshold, such as those generating more than £25 million annually. The fund would support a broad range of organisations, including public service broadcasters, independent media organisations, content creators and influencers producing public interest content. It should be administered by an independent body, separate from government and industry interests, to ensure accountability and independence.

The proposal builds on international precedent. Canada's Online Streaming Act (2023) requires eligible platforms to contribute 5% of their Canadian revenues to media funds, while France's SMAD regime (2021) requires streaming services to invest 20-25% of French turnover in domestic and European productions. Similar calls have been made in the UK, including by the Culture, Media and Sport Committee's British film and high-end television report, which supported a 5% contribution from streamers to a cultural fund.

5. Which other countries have implemented prominence regimes?

Other countries are increasingly updating prominence rules to reflect digital and platform environments, moving beyond traditional "must-carry" obligations for broadcast TV, and requiring major digital platforms to prioritise public interest and local content.

Canada and France are particularly noteworthy international precedents because both countries have introduced legislation that extends existing prominence rules to the platform environment, and combined with financial obligations to contribute to the production and sustainability of media content.

Canada's Online Streaming Act (2023) requires platforms to make Canadian content discoverable and contribute at least 5% of their Canadian revenues to support domestic content production. The Act's intention to amend discoverability rules received overall support from media and creative industry groups (such as the Alliance of Canadian Cinema, Television and Radio Artists (ACTRA), the Directors Guild of Canada (DGC) and CBC/Radio-Canada) who said that government policy was needed to meet audience's changing viewing habits on streaming platforms.[17] However, the Act's proposed discoverability rules received strong criticism from Netflix and

[17] ACTRA (2023). ACTRA calls for Heritage Committee to amend Online Streaming Act to support Canadian stories and creators.
https://www.actra.ca/actra-calls-for-heritage-committee-to-amend-online-streaming-act-to-support-canadian-stories-and-creators/

YouTube/Google who said the rules would undermine platform recommender systems which they suggested would impact user choice.[18][19] Civil society and digital rights organisations also criticised the level of decision-making authority given to the Canadian Radio Telecommunications Commission (CRTC) - Canada's media regulator and Ofcom equivalent - over content prioritisation decisions.[20]

Similarly, France's Services de Médias Audiovisuels à la Demande requires platforms to give appropriate visibility to European works and reinvest 20–25% of French turnover into European and French audiovisual production.

In the EU, existing rules under the Audiovisual Media Services Directive already require on-demand services to ensure at least 30% of their catalogues are European works. With a review of the AVMSD forthcoming in 2026, there is growing momentum to further clarify and expand prominence requirements on platforms. In late 2025, 26 out of 27 member states supported the Danish Presidency's proposals for the European Democracy Shield to require platforms to increase access to accurate and reliable news.

[18] Patell, J. (2022). An update from YouTube Canada on the Online Streaming Act. Google Canada.

[19] We have previously outlined how engagement-first recommender algorithms do not necessarily prioritise user choice as argued by YouTube/Google, but have been proven to prioritise content eliciting strong emotional reactions, which may not align with user choice. In fact, users have little agency over the parameters of current recommendation systems. See: Demos. (2026). Fairer feeds: Public interest news, prominence rules and the future of discoverability on platforms. https://demos.co.uk/research/fairer-feeds-public-interest-news-prominence-rules-and-the-future-of-discoverability-on-platforms/

[20] Bhullar, R. (2022). Online Streaming Act Bill C-11 repeats Bill C-10's mistakes. OpenMedia. https://openmedia.org/article/item/online-streaming-act-bill-c-11-repeats-bill-c-10s-mistakes ; Canadian Heritage. (2022). *Senate Standing Committee on Transport and Communications (TRCM) – September 14, 2022, 6:00 p.m. to 8:30 p.m. (second meeting)*. Government of Canada. https://www.canada.ca/en/canadian-heritage/corporate/transparency/open-government/standing-committee/rodriguez-bill-c11/second-meeting-september-14.html