

# DEMOS



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SECURITY  
NETWORK  
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# WATCH THIS SPACE GREEN PAPER CONSULTATION SUBMISSION RESPONSE

## About Demos

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 mission is an upgraded democracy, with a new deal to mend the broken relationships between the state, institutions, and citizens.

Demos Digital is Demos' digital policy research hub.<sup>1</sup> We work to strengthen information supply chains to break the cycles of misinformation and mistrust that fuel democratic decline.

At Demos Digital, we contend that our *epistemic security* – the resilience of the UK's information supply chains that our democracy depends on – is under threat.<sup>2</sup> By 'information supply chains', we mean the full lifecycle of the information that we use to understand the world and make decisions, from production to distribution to eventual action. Demos Digital co-ordinates the Epistemic Security Network to help address these challenges: a group of civil society organisations and individuals which collaborates to fortify our information supply chains.<sup>3</sup> This submission is based both on research published by Demos in June 2026, *Fairer Feeds: Public interest news, prominence rules, and the future of discoverability on platforms* as well as additional research and engagement with our Network conducted between July-August 2026.<sup>4</sup>

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<sup>1</sup> Demos Digital, <https://demoss.co.uk/demos-digital/> ;  
<https://demoss.co.uk/our-approach/resilient-information-ecosystems/>

<sup>2</sup> Seger, Perry & Hancock (2025) "Epistemic Security 2029." Demos.  
[https://demoss.co.uk/wp-content/uploads/2025/02/Epistemic-Security-2029\\_accessible.pdf](https://demoss.co.uk/wp-content/uploads/2025/02/Epistemic-Security-2029_accessible.pdf)

<sup>3</sup> Demos, "Epistemic Security Network." <https://demoss.co.uk/epistemic-security-network/>

<sup>4</sup> Lyall & Moores (2026) "Fairer Feeds: Public interest news, prominence rules, and the future of discoverability on platforms." Demos.

## INTRODUCTORY QUESTION

Q1 The green paper covers topics relating to the future of UK television and media. More specifically, it includes content on:

- The current market and audience context
- Prominence of news and of public service media
- Future of TV distribution and regulation
- A new system for public service media
- Media literacy

What are your overall views on the future of television and media in the UK, related to the topics in this green paper?

Demos welcomes the government's media green paper *Watch this space: a new strategic direction for UK media* and its recognition that the UK's media environment is undergoing profound structural change. 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. We welcome the Government's recognition that the regulatory framework needs to urgently respond to these changes, and that the future of UK media cannot be considered separately from the health of our wider information environment and democracy.

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. This is about a choice to establish a degree of democratic accountability over who controls the information environment. 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.

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<https://demos.co.uk/research/fairer-feeds-public-interest-news-prominence-rules-and-the-future-of-discoverability-on-platforms/>

However, we do not see prominence as a solution to *all* of the problems facing the information environment. In particular, prominence rules will not by themselves combat misinformation, algorithmic amplification of harmful content, address declining trust, rebuild the news ecosystem or resolve the underlying incentives and infrastructure that shape how information is produced and distributed. Importantly, prominence may not result in people consuming the public interest news content. Rather, it would simply increase its visibility and thereby people's opportunity to do so. Prominence should therefore be understood as one part of a wider policy response along the information supply chain - a mechanism for increasing the visibility and discoverability of high-quality, public interest information in an environment where engagement-driven systems can otherwise make it difficult for reliable sources to compete for attention.

We particularly welcome the green paper's focus on news prominence, public service media, media literacy and the future distribution of television as interconnected issues. Citizens' ability to access reliable information depends both on the existence of high-quality journalism and public service media. Similarly, media literacy cannot be treated simply as teaching individuals to identify misinformation after they encounter it. People also need the skills and information necessary to understand how platforms, recommender systems and AI shape what they see in the first place.

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.

We therefore welcome the direction of travel in the green paper, but believe its proposals should be recognised and developed as part of a broader strategy for a resilient UK information environment. As the way citizens consume television, news and information continues to change, the central objective should be to ensure that they retain meaningful access to a diverse, independent and reliable information environment that supports informed participation in democratic life.

## PROMINENCE OF NEWS ON SOCIAL MEDIA

Q3 How often do you encounter news you feel is untrustworthy when online (for example, something you consider to be misinformation)?

Never

Rarely

Sometimes

Often

Very often

Not sure

Alongside partners, Demos Digital has produced an extensive and robust evidence-base showing that the UK public frequently encounters news content online that falls under one or more of the following attributes of 'untrustworthy' information: false/misleading, or hateful. Algorithmic amplification contributes to the proliferation of false/misleading or hateful content, while platform moderation systems are currently inadequate for effectively addressing it. Additionally, this news content is produced both by social media users and by news publishers. This underlines why it will be important for the government to develop a 'public interest' news definition in collaboration with diverse sectors of the media industry - to ensure that news providers consistently offering accurate and reliable news information are prioritised, and not those publishing false/misleading or hateful news content.

False and misleading information proliferates on online platforms. A 2026 Ofcom survey found that more than half of social media users (56%) self-reported encountering false/misleading news content in the past year.<sup>5</sup> Research by the Institute for Strategic Dialogue (ISD) in the immediate aftermath of the 2024 Southport riots found that a post spreading a false name of the attacker received 30,000 mentions on X alone from over 18,000 unique accounts by 3pm the day after the attack, and 1.4 million views within 2 days.<sup>6</sup> More recently, Demos' research found that 30% of surveyed adults saw deepfakes of politicians during the month preceding the 2026 Scottish elections.<sup>7</sup> In another study, the Social Market Foundation found that misinformation on local social media groups as a share

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<sup>5</sup> Ofcom. (2026). *Adults' media use and attitudes 2026 report*.

<https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/media-literacy-research/adults/adults-media-use-and-attitudes-2026/adults-media-use-and-attitudes-2026-report.pdf>

<sup>6</sup> Institute for Strategic Dialogue. (2025). *ISD written evidence to the Science, Innovation and Technology Committee inquiry on social media, misinformation and harmful algorithms*.

<https://www.isdglobal.org/wp-content/uploads/2025/01/ISD-Written-Evidence-to-the-Science-Innovation-and-Technology-Committee-Inquiry-on-Social-Media-Misinformation-and-Harmful-Algorithms.pdf>

<sup>7</sup> Hancock, J., & Moores, A. (2026). *Electoral hallucinations: Safeguarding UK elections in the world of LLMs and AI chatbots*. Demos.

of news content grew by 56% in the lead up to the 2026 local elections (from 8.2% of all news posts to 12.9%).<sup>8</sup> These figures show that the UK public is not only encountering 'untrustworthy' information online 'very often', but increasingly so.<sup>9</sup>

Hateful content proliferates on online platforms amassing significant engagement (views) with the public. Following the 2024 Southport riots, Demos found that posts on X that were explicitly threatening to communities - primarily migrants, Muslims and other minoritised ethnic groups - amassed 92.7 million views between them, while a single post falsely claiming the attack was "racially motivated" reached 21.1 million views.<sup>10</sup> In the ten days following the Southport attack, the Institute for Strategic Dialogue (ISD) found that anti-Muslim slurs more than doubled, with over 40,000 posts containing one or more instances of anti-Muslim slurs.<sup>11</sup> Additionally, the Centre for Countering Digital Hate (CCDH) found that, over five days in 2025, antisemitic conspiracy posts on X reached 139 million views, with 126 posts accumulating at least 100,000 posts each.<sup>12</sup>

False/misleading or hateful news content is amplified by engagement-first recommendation systems on platforms. The proliferation of false/misleading or hateful news content on online platforms is both an issue of information production and of information dissemination and prioritisation through platform design. A number of academic research studies found that recommendation systems on X/Twitter and YouTube have increased the spread of false and misleading information.<sup>13</sup> Similarly, separate studies by civil society organisations have found that recommendation systems have amplified hateful and extremist content, including antisemitic content,<sup>14</sup> and extreme misogynistic content.<sup>15</sup> Even internal research from Meta found that their algorithm allowed more

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<sup>8</sup> Social Market Foundation. (2025). *Social media and local misinformation*.

<https://www.smf.co.uk/publications/social-media-local-misinformation/>

<sup>9</sup> Demos (2024). *Driving disinformation: Democratic deficits, disinformation and low traffic neighbourhoods – a portrait of policy failure*. Demos & Public Interest News Foundation.

[https://demos.co.uk/wp-content/uploads/2024/05/Driving-Disinformation\\_final.pdf](https://demos.co.uk/wp-content/uploads/2024/05/Driving-Disinformation_final.pdf)

<sup>10</sup> Perry, H., Corsi, G., & Malik, N. (2025, July 15). *Researching the riots: An evaluation of the efficacy of Community Notes during the 2024 Southport riots*. Demos.

<https://demos.co.uk/research/researching-the-riots-an-evaluation-of-the-efficacy-of-community-notes-during-the-2024-southport-riots/>

<sup>11</sup> Institute for Strategic Dialogue. (2024). *Evidencing a rise in anti-Muslim and anti-migrant online hate following the Southport attack*.

<https://www.isdglobal.org/digital-dispatch/evidencing-a-rise-in-anti-muslim-and-anti-migrant-online-hate-following-the-southport-attack/>

<sup>12</sup> Center for Countering Digital Hate. (2025). *Instagram fuels \$1.3M "hate merch" economy, including T-shirts glorifying Hitler, new report finds*. [Center for Countering Digital Hate](https://www.ccdh.org/)

<sup>13</sup> Pathak, R., Spezzano, F. & Pera, M.S. (2023) "Understanding the Contribution of Recommendation Algorithms on Misinformation Recommendation and Misinformation Dissemination on Social Networks." *ACM Transactions on the Web*, 17(4), Article 35. <https://doi.org/10.1145/3616088> ; Fernandez, M., Bellogin, A. & Cantador, I. (2024) "Analysing the Effect of Recommendation Algorithms on the Spread of Misinformation." In: *WebSci '24: 16th ACM Web Science Conference*, Stuttgart, Germany, pp. 159–169.

<https://doi.org/10.1145/3614419.3644003> ; Fernandez, Miriam

<sup>14</sup> Eisenstat, Y. & Paul, K. (2023) "Two Studies: Social Media Algorithms Fuel Online Hate." *Tech Transparency Project*. <https://www.techtransparencyproject.org/articles/two-studies-social-media-algorithms-fuel-online-hate> ; [https://www.isdglobal.org/wp-content/uploads/2026/05/Amplifying-Antisemitism\\_How-Recommender-Algorithms-Serve-Harmful-Content-to-Children.pdf](https://www.isdglobal.org/wp-content/uploads/2026/05/Amplifying-Antisemitism_How-Recommender-Algorithms-Serve-Harmful-Content-to-Children.pdf)

<sup>15</sup> Wale, S. (2024) "Social media algorithms 'amplifying misogynistic content.'" *The Guardian*.

<https://www.theguardian.com/media/2024/feb/06/social-media-algorithms-amplifying-misogynistic-content>

"borderline" harmful content, including misogyny and conspiracy theories, within users' feeds.<sup>16</sup>

Moderation systems on online platforms are currently inadequate for addressing the proliferation of false/misleading or hateful news content online. The House of Commons Science, Innovation and Technology (SIT) Committee found that during the 2024 Southport riots, platforms were often slow to respond, failed to prevent the algorithmic amplification of harmful content, and allowed false information and hate speech to remain online.<sup>17</sup> Indeed, Demos' research into X's Community Notes moderation system found that false claims about the attacker reached 1.5 million views without being corrected, while posts inciting racist or religious hatred remained online despite both Community Notes and professional moderation.<sup>18</sup> Additionally, major social media platforms have repeatedly reduced investment in Trust & Safety (T&S) functions, undermining their capacity to effectively moderate harmful information. X slashed its global T&S staff by 30% from 2022-24 after Musk's takeover,<sup>19</sup> while Meta has eliminated more than 21,000 jobs from T&S teams since 2023.<sup>20</sup> In October 2025, TikTok announced 439 planned redundancies in its London Trust & Safety Team,<sup>21</sup> with 400 UK online-safety workers leaving by December 2025, and only five remaining in consultation.<sup>22</sup> Not only does false/misleading or hateful news information proliferate, but platform moderation systems are failing to address it, whilst actively reducing the capacity to do so via their T&S teams.

Crucially, false/misleading or hateful news content is not just produced by social media users but by news publishers too. In a 2024 Ofcom survey, 21% of respondents said that they had encountered misinformation via print newspapers or their associated websites.<sup>23</sup> Additionally, a 2025 analysis of six months of UK national-newspaper coverage of electric vehicles, published by the Energy and Climate Intelligence Unit (ECIU), found that 25% of

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<sup>16</sup> Spring, M. & Radford, M. (2026) "Meta and TikTok let harmful content rise after evidence outrage drove engagement, say whistleblowers." BBC News, 16 March 2026.

<https://www.bbc.co.uk/news/articles/cqj9kqxqjwjo>

<sup>17</sup> Science, Innovation and Technology Committee. (2024). *Social media, misinformation and harmful algorithms* (Second Report of Session 2024–25). House of Commons.

<https://publications.parliament.uk/pa/cm5901/cmselect/cmsctech/441/report.html>

<sup>18</sup> Demos (2025). *Researching the riots: An evaluation of the efficacy of Community Notes during the 2024 Southport riots*. Demos.

[https://demos.co.uk/wp-content/uploads/2025/07/Researching-the-riots\\_2025\\_July.ac\\_.pdf](https://demos.co.uk/wp-content/uploads/2025/07/Researching-the-riots_2025_July.ac_.pdf)

<sup>19</sup> McGuirk, R. (2024). *X Corp. has slashed 30% of trust and safety staff, an Australian online safety watchdog says*. Associated Press.

<https://apnews.com/article/x-corp-musk-australia-staff-safety-bc4772369cab1fe8dd975132fd8d61ed>

<sup>20</sup> Shorenstein Center on Media, Politics and Public Policy. *Information quality may decrease as companies cut back on trust and safety funding*. Election Essentials.

<https://electionessentials.shorensteincenter.org/tip-2>

<sup>21</sup> Almeida, L. (2025). *UK MPs urged to investigate TikTok's plans to cut 439 content moderator jobs*. The Guardian.

<https://www.theguardian.com/technology/2025/oct/13/uk-mps-tiktok-plans-cut-content-moderator-jobs>

<sup>22</sup> Carroll, M. (2025). *Hundreds of UK moderators have left TikTok—sparking safety fears, whistleblowers reveal*. Sky News.

<https://news.sky.com/story/hundreds-of-uk-moderators-have-left-tiktok-sparking-safety-fears-whistleblowers-reveal-13478302>

<sup>23</sup> Ofcom. (2024). *Understanding misinformation: An exploration of UK adults' behaviour and attitudes*.

<https://www.ofcom.org.uk/media-use-and-attitudes/attitudes-to-news/understanding-misinformation-an-exploration-of-uk-adults-behaviour-and-attitudes>

all EV-related articles analysed contained at least one misleading statement.<sup>24</sup> In 2020, Full Fact, the independent fact-checking organisation, requested 110 corrections from UK media organisations concerning inaccurate or misleading information, only 52% of which were fully resolved.<sup>25</sup> Regarding the publication of hateful content by news publishers, the Runnymede Trust analysed nearly 53,000 news articles about immigration from the years 2019-2024 to examine how the media have portrayed migrants, refugees and Muslims.<sup>26</sup> The research found that the word 'illegal' remains the number one association for 'immigrants', and outlines the continued use of racist tropes and stereotypes, including representations of Muslim migrant men as threats to women, and associations of migrants with deception and laziness.

This research underscores that news publishers are not immune from the publication of 'untrustworthy' information - including false/misleading or hateful content - but in many instances actively contribute to its production. To ensure that prominence rules do not contribute to the dissemination of this harmful content online by prioritising news publishers that produce it, the government will need to establish a clear and specific definition of 'public interest news' based on robust editorial workflows, or additional public interest duties (see Question 4).

#### Q4 Do you believe 'trustworthy' news content should be more visible on social media?

Yes

No

Not sure

The green paper proposes that news prominence on platforms should be determined by "trustworthiness". Demos does not support this approach. Instead, we have called for news prominence on social media to be rooted in clear definitions of "public interest news", with independently-established parameters for determining which news should receive prominence.

Currently, large technology companies are significantly controlling how and which information citizens have access to on their social media feeds. Algorithmic design choices and content prioritisation processes on online platforms are rewarding news content that is misleading, inflammatory and hateful news, while accurate and reliable news sources face declining visibility. A number of academic research studies found that recommendation systems on X/Twitter and YouTube have increased the spread of false and misleading

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<sup>24</sup> Walker, C. (2025). *New analysis finds widespread misinformation around EVs in UK newspapers*. Energy & Climate Intelligence Unit.  
<https://eciu.net/media/press-releases/2025/embargoed-new-analysis-finds-widespread-misinformation-around-evs-in-uk-newspapers>

<sup>25</sup> Full Fact. (2021). *The Full Fact Report 2021: Fighting a pandemic needs good information*.  
<https://fullfact.org/media/uploads/full-fact-report-2021.pdf>

<sup>26</sup> Montiel-McCann, C., & Julios-Costa, M. (2025). *A hostile environment: Language, race, surveillance and the media*. Runnymede Trust.  
<https://www.runnymedetrust.org/publications/a-hostile-environment-language-race-surveillance-and-the-media>

information.<sup>27</sup> Similarly, separate studies by civil society organisations have found that recommendation systems have amplified hateful and extremist content, including antisemitic content,<sup>28</sup> and extreme misogynistic content.<sup>29</sup> Even internal research from Meta found that their algorithm allowed more “borderline” harmful content, including misogyny and conspiracy theories, within users' feeds.<sup>30</sup>

At the same time, the 2025 Reuters Digital News Report found that aggregate Facebook traffic to news and media sites had fallen by 67% over two years, while traffic from X had fallen by 50%. The same report identified that platforms have shifted algorithmic prioritisation strategies towards video content, which may be disadvantaging visibility for text-based news publisher content, while also redirecting prioritisation away from news content.<sup>31</sup>

These content prioritisation decisions are currently made by online platforms in opaque and unaccountable ways, and without third-party input. An academic study based on public polling in four countries found that the majority of users do not understand how algorithms filter the news they encounter on social media,<sup>32</sup> while regulators themselves have previously identified a transparency deficit and have had to request detailed information from major platforms about the parameters and functioning of their recommender systems.<sup>33</sup>

If developed and implemented effectively, updated prominence rules could mitigate these anti-democratic, opaque, and unaccountable content prioritisation processes and ensure that high-quality public interest news information can compete for attention in systems that currently prioritise engagement. As outlined in our recent paper *Fairer Feeds*, prominence for ‘public interest news’ could bring democratic benefits by supporting citizens to access reliable information, make informed decisions, hold powerful actors accountable, and build media literacy to counter misinformation.<sup>34</sup> The paper also outlines how news prominence

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<sup>27</sup> Pathak, R., Spezzano, F. & Pera, M.S. (2023) "Understanding the Contribution of Recommendation Algorithms on Misinformation Recommendation and Misinformation Dissemination on Social Networks." *ACM Transactions on the Web*, 17(4), Article 35. <https://doi.org/10.1145/3616088> ; Fernandez, M., Bellogín, A. & Cantador, I. (2024) "Analysing the Effect of Recommendation Algorithms on the Spread of Misinformation." In: *WebSci '24: 16th ACM Web Science Conference*, Stuttgart, Germany, pp. 159–169.

<https://doi.org/10.1145/3614419.3644003> ; Fernandez, Miriam

<sup>28</sup> Eisenstat, Y. & Paul, K. (2023) "Two Studies: Social Media Algorithms Fuel Online Hate." Tech Transparency Project. <https://www.techtransparencyproject.org/articles/two-studies-social-media-algorithms-fuel-online-hate> ; [https://www.isdglobal.org/wp-content/uploads/2026/05/Amplifying-Antisemitism\\_How-Recommender-Algorithms-Serve-Harmful-Content-to-Children.pdf](https://www.isdglobal.org/wp-content/uploads/2026/05/Amplifying-Antisemitism_How-Recommender-Algorithms-Serve-Harmful-Content-to-Children.pdf)

<sup>29</sup> Wale, S. (2024) "Social media algorithms 'amplifying misogynistic content.'" *The Guardian*. <https://www.theguardian.com/media/2024/feb/06/social-media-algorithms-amplifying-misogynistic-content>

<sup>30</sup> Spring, M. & Radford, M. (2026) "Meta and TikTok let harmful content rise after evidence outrage drove engagement, say whistleblowers." *BBC News*, 16 March 2026. <https://www.bbc.co.uk/news/articles/cqj9kqxqjwjo>

<sup>31</sup> Newman, N. (2025). *Overview and key findings of the 2025 Digital News Report*. Reuters Institute for the Study of Journalism. <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2025/dnr-executive-summary>

<sup>32</sup> Fletcher, R., & Nielsen, R. K. (2019). Generalised scepticism: How people navigate news on social media. *Information, Communication & Society*, 22(12), 1751–1769. <https://doi.org/10.1080/1369118X.2018.1450887>

<sup>33</sup> In 2024, the European Commission formally requested information from YouTube, Snapchat and TikTok about the design and functioning of their recommender systems, including the parameters used by their algorithms and their role in amplifying particular risks. See: <https://digital-strategy.ec.europa.eu/en/news/commission-sends-requests-information-youtube-snapchat-and-tiktok-recommender-systems-under-digital>

<sup>34</sup> Demos (2026). *Fairer feeds: Public interest news, prominence rules, and the future of discoverability on platforms*. Demos.

could improve the financial sustainability of the public interest news landscape by increasing visibility, audience engagement, and referral traffic, leading to higher advertising and subscription revenue.

However, 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 *audience-perception-based* approach - asking audiences whether they trust a publisher - is a subjective judgment and one that 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.<sup>35</sup> <sup>36</sup> The latter *process-based* approach - assessing whether a news provider has independently-verifiable structures in place - is a more objective judgment based on a set of auditable governance facts. For example: does an editorial code exist? Is there a functioning complaints process? Is ownership transparent? In principle, these facts could be demonstrated by any news provider regardless of size, age, or audience perception. This approach would mean that a digital-first outlet founded last year can satisfy *process-based* criteria as readily as a century-old newspaper - even if it cannot straightforwardly out-compete that newspaper on accumulated audience trust. The ‘public interest news’ definition proposed below 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, we disagree with the green paper’s proposal to use the Online Safety Act’s ‘Recognised News Publisher’ (RNP) definition as a shorthand for ‘trustworthiness’.<sup>37</sup> This definition is unfit for the purpose of a news prominence regime because it 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 RNP definition allows publishers to satisfy the ‘standards code’ and complaints-handling requirements largely through self-declaration, with no independent verification. The issues with this definition were raised during the Bill’s passage through the House of Lords, where peers warned the exemption could allow “extremist” or “harmful” publishers to exploit

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<https://demos.co.uk/research/fairer-feeds-public-interest-news-prominence-rules-and-the-future-of-discoverability-on-platforms/>

<sup>35</sup> Nielsen, R.K. & Fletcher, R. (2024) "Public perspectives on trust in news." Reuters Institute Digital News Report 2024. <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2024/public-perspectives-trust-news>

<sup>36</sup> 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/>

<sup>37</sup> Online Safety Act 2023, s.56. <https://www.legislation.gov.uk/ukpga/2023/50/section/56>

vague criteria, and that it left both platforms and Ofcom in a difficult position when assessing whether outlets genuinely met the standard.<sup>38</sup>

#### Preferred definition: Public Interest News

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.<sup>39</sup> 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.

At Demos, we have proposed the establishment of a co-regulatory and multi-stakeholder body to oversee the process for democratically progressing a definition for 'public interest news'. This would allow for the development of the definition to be sufficiently independent from government, and involving diverse sectors of the media industry, civil society, as well as deliberative input from the public (see Question 4a for further information on the co-regulatory body).<sup>40</sup>

Additionally, the 'public interest news' definition should not be treated as fixed at its 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

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<sup>38</sup> 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>

<sup>39</sup> 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/>

<sup>40</sup> 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/>

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).<sup>41</sup> This review would not replicate the full consultation process used 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.

#### Q4a How would you like this to look in practice, so that audiences can access trustworthy news more easily on social media?

Our preferred model is one in which news providers deemed worthy of an independently developed 'public interest news' definition are easier for audiences to discover on social media, without giving government or platforms undue control over which news providers are heard. To strengthen rather than undermine media independence and media pluralism, achieving this balance requires independent oversight, meaningful public and industry consultation, and robust democratic safeguards for transparency, accountability, and user choice.

There are significant risks associated with rushed or poorly-designed prominence regimes. If not implemented with acute attention to media independence and media pluralism, there is the risk that state or commercial actors may exert disproportionate influence over decisions about which news providers receive prominence. This could result in, for example, the government selecting a narrow list of media providers that it considers worthy of prioritisation, using prominence rules to favour particular interests or viewpoints, while limiting the visibility of others. Left unchecked, this could gradually distort the media landscape, crowding out diversity in favour of a narrower set of dominant voices.

As such, we at Demos emphasise that prominence updates should only be made under the following enabling conditions. Without these conditions, the government risks facing significant public and industry backlash, charges of censorship, and ultimately the creation of a prominence regime that undermines media independence, media pluralism, and lacks democratic legitimacy.

##### 1. A co-regulatory body is established.

To ensure the oversight of the regime is sufficiently independent from government, *and* able to enforce effective accountability of platform content prioritisation processes, a co-regulatory body would hold responsibility for oversight of prominence.

Co-regulation is a model of collaborative governance that implies responsibility-sharing 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,

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<sup>41</sup> Etteldorf, C. (2025). *Public value determination procedure for content discoverability on user interfaces completed*. European Audiovisual Observatory. <https://merlin.obs.coe.int/article/10348>

enforcement, and compliance) and statutory regulation (which is limited by a lack of independence from the state).<sup>42</sup>

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 Video-On-Demand 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 civil society.<sup>43</sup> In this example, the state retains a regulatory role where self-regulation is insufficient - for example, in cases of repeated violations.<sup>44</sup>

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

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<sup>42</sup> Furnémont, J.-F., & Kerševan Smokvina, T. (2017). *European co-regulation practices in the media: Comparative analysis and recommendations with a focus on the situation in Serbia*. Council of Europe. <https://rm.coe.int/european-co-regulation-practices-in-the-media/16808c9c74>

<sup>43</sup> 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/>

<sup>44</sup> Ibid.

These principles have been drawn in part from the European Commission's *Principles for Better Self- and Co-Regulation* (2013).<sup>45</sup>

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 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.<sup>46</sup> 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

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<sup>45</sup> 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-unity-practice>

<sup>46</sup> 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.

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.<sup>47</sup>
- 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 pre-appointment scrutiny of senior nominees by a relevant parliamentary select committee.<sup>48</sup> 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.

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<sup>47</sup>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](https://demos.co.uk/wp-content/uploads/2026/06/Media-Prominence_Report_2026.pdf)

<sup>48</sup> Perry, H., Padania, S., & Curtis, P. (2026). Your BBC. Demos.

[https://demos.co.uk/wp-content/uploads/2026/03/BBC-Submission\\_2026\\_March.pdf](https://demos.co.uk/wp-content/uploads/2026/03/BBC-Submission_2026_March.pdf)

- 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.
- 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.

## 2. Democratic safeguards are 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.

Without these measures, the government's prominence regime would present significant risks and political and public opposition. If these measures are in place, at a technical level 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.

For this, 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.

Q5 If government gives prominence to trustworthy providers of news (meaning by making them more visible online), should this prominence be ongoing, and 'always on,' or only active during periods of crisis?

*Ongoing and 'always on'*

*Only during periods of heightened vulnerability*

*Not sure*

Provided they are implemented according to the measures outlined above, prominence should be ongoing and 'always on'. The current mechanisms for content prioritisation on platforms - engagement-first recommender algorithms - operate continuously. Any response mitigating their corrosive democratic impacts will need to be similarly consistent. If the goal of a prominence regime is to decrease the visibility of misinformation and promote high-quality, 'public interest news' information, these are not issues limited to crisis periods, but rather continuous.

There is a growing body of research evidencing how engagement-first recommender algorithms consistently amplify content eliciting strong emotional reactions, which tends to be 'untrustworthy' information online (i.e. false, misleading or hateful). For example, a number of academic research studies found that recommendation systems on X/Twitter and YouTube have increased the spread of false and misleading information.<sup>49</sup> Similarly, separate studies by civil society organisations have found that recommendation systems have amplified hateful and extremist content, including antisemitic content,<sup>50</sup> and extreme misogynistic content.<sup>51</sup> Even internal research from Meta found that their algorithm allowed more "borderline" harmful content, including misogyny and conspiracy theories, within users' feeds.<sup>52</sup>

All the examples listed above took place outside periods of crisis, and would not be mitigated by intermittent prominence measures. As such, news prominence measures should be 'always on' to bring democratic benefits that are not simply reactive (i.e. responding to false/misleading information after it has been produced), but also preventative. Indeed, in our recent paper *Fairer Feeds*, we outlined how increasing citizen access to 'public interest news' could increase civic resilience against mis/disinformation because it empowers citizens to compare different information sources on the same story, verify false claims, and develop foundational media literacy skills needed to recognise

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<sup>49</sup> Pathak, R., Spezzano, F. & Pera, M.S. (2023) "Understanding the Contribution of Recommendation Algorithms on Misinformation Recommendation and Misinformation Dissemination on Social Networks." *ACM Transactions on the Web*, 17(4), Article 35. <https://doi.org/10.1145/3616088> ; Fernandez, M., Bellogín, A. & Cantador, I. (2024) "Analysing the Effect of Recommendation Algorithms on the Spread of Misinformation." In: *WebSci '24: 16th ACM Web Science Conference*, Stuttgart, Germany, pp. 159–169.

<https://doi.org/10.1145/3614419.3644003> ; Fernandez, Miriam

<sup>50</sup> Eisenstat, Y. & Paul, K. (2023) "Two Studies: Social Media Algorithms Fuel Online Hate." Tech Transparency Project. <https://www.techtransparencyproject.org/articles/two-studies-social-media-algorithms-fuel-online-hate> ; <https://www.isdglobal.org/wp-content/uploads/2026/05/Amplifying-Antisemitism-How-Recommender-Algorithms-Serve-Harmful-Content-to-Children.pdf>

<sup>51</sup> Wale, S. (2024) "Social media algorithms 'amplifying misogynistic content.'" *The Guardian*. <https://www.theguardian.com/media/2024/feb/06/social-media-algorithms-amplifying-misogynistic-content>

<sup>52</sup> Spring, M. & Radford, M. (2026) "Meta and TikTok let harmful content rise after evidence outrage drove engagement, say whistleblowers." *BBC News*, 16 March 2026. <https://www.bbc.co.uk/news/articles/cqj9kgxqjwjo>

unreliable or manipulative content. Instead of tackling mis/disinformation after it has arisen, prominence measures could seek to preventatively provide citizens with the baseline tools they need to make their own judgements in a complex information environment.

Finally, there is also no settled definition of what constitutes a ‘crisis’ across UK government policy. Demos raised this concern in its submission to Ofcom’s consultation on crisis response protocols, arguing that the original proposal for a definition was insufficiently precise and risked inconsistent application across platforms.<sup>53</sup> In particular, we recommended a clearer, tiered definition of crisis, with different levels of severity and clearer thresholds for triggering a response and a recognition that a crisis can also exist on a local level. Ofcom’s Crisis Response Protocol, published in June 2026, includes an updated definition for a crisis that incorporates consultation feedback (including from Demos, Full Fact, and the Online Safety Act Network<sup>54</sup>) on the need for a more precise crisis definition.

Regardless, Ofcom’s updated definition remains too vague, which could allow platforms the opportunity to take advantage of its flexibility - either by acting too little or too much - creating risks for both public safety and freedom of expression. Ofcom’s definition has also not yet been approved by Parliament, leaving outstanding regulatory uncertainty over crisis definitions.

#### Q6 Do you feel individual users should be given an option in whether prominence measures for trustworthy news content are switched on or off for them?

Prominence measures for ‘public interest news’ content on social media should be accompanied by options for users to opt-out, alongside clear information explaining to users how the system works. This will ensure that prominence measures support data protection principles of explainability, informed consent, and user autonomy.

Users should be given the option to opt-out of prominence measures to provide greater agency over the content they receive online. Such measures would enhance the democratic legitimacy of updated prominence rules by giving users a concrete means of challenging content prioritisation if they believe it excessively or insufficiently favoured certain types of content. A default-on model would increase users’ exposure to public interest news while preserving individual autonomy and agency through a clear opt-out mechanism. In doing so, an opt-out measure would ensure the prominence regime aligns with Ofcom’s June

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<sup>53</sup> Demos (2025). *Ofcom consultation response: Additional safety measures for online platforms*. Demos. <https://demos.co.uk/research/ofcom-consultation-response-additional-safety-measures-for-online-platforms/>

<sup>54</sup> Demos (2025). *Ofcom consultation response: Additional safety measures for online platforms*. Demos. <https://demos.co.uk/research/ofcom-consultation-response-additional-safety-measures-for-online-platforms/> ; Online Safety Act Network. (2025). *Response to Ofcom’s Additional Safety Measures consultation: Individual measures*. Ofcom. <https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/consultation-online-safety---additional-safety-measures/responses/online-safety-act-network.pdf> ; Full Fact. (2025). *Full Fact’s submission to Ofcom’s Additional Safety Measures Consultation*. Ofcom. <https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/consultation-online-safety---additional-safety-measures/responses/full-fact.pdf>

2026 media literacy recommendations that explicitly emphasise meaningful choice and practical tools that allow people to actively manage and control their online experience.<sup>55</sup>

To enable informed consent, prominence measures should be accompanied by clear information outlining in an accessible manner to citizens: why certain news providers are receiving prioritisation, the criteria according to which prioritisation decisions are made, the process for making prioritisation decisions, and avenues for users to exercise their autonomy over platform prioritisation processes. This would ensure that users are informed about the provenance, accountability, and regulatory status of the news sources they encounter online, and empowered to make informed decisions about their consent to the prominence regimes, and whether they wish to exercise their avenues for opting-out.

## MEDIA LITERACY DUTY AND JOINT VENTURE

Q7 How concerned, if at all, are you about the impact of misleading or unreliable information on society?

*Very concerned*

*Somewhat concerned*

*Not very concerned*

*Not at all concerned*

*Not sure*

We consider Questions 7 and 8 to be closely interconnected and, in practice, difficult to separate. The information environment affects society, but the consequences ultimately have a direct bearing on democracy: on trust, participation, public debate, accountability and citizens' ability to make informed decisions. For this reason, we have addressed the two questions together.

Q8 How concerned, if at all, are you about the impact of misleading or unreliable information on democracy?

*Very concerned*

*Somewhat concerned*

*Not very concerned*

*Not at all concerned*

*Not sure*

We are extremely concerned. As set out in our paper, *Epistemic Security: Information Resilience Priorities for 2026-2029*, the UK is facing an increasingly urgent information crisis

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<sup>55</sup> Ofcom. (2026). How to promote media literacy: Statement on recommendations for online platforms, broadcasters and services.  
<https://www.ofcom.org.uk/media-use-and-attitudes/media-literacy/how-to-promote-media-literacy-consultation-on-recommendations-for-online-platforms-broadcasters-and-services>

that is now a core part of the wider democratic emergency.<sup>56</sup> Reliable information is essential to democracy: citizens need to be able to understand events, assess competing claims and make informed decisions, while democratic institutions need an accurate and reliable information environment in which to operate.

The information environment has changed rapidly and fundamentally. Information now flows through an increasingly complex and digital supply chain: from production and distribution, to retrieval and evaluation, to how people deliberate and make decisions. Social media, search engines, AI systems and recommender algorithms increasingly mediate this process, while control over critical parts of the underlying infrastructure is concentrated in a small number of powerful technology companies. For example, the UK's three most-used social media or video-sharing services are all owned by US technology companies. Indeed, Ofcom's *Online Nation 2025* report found that YouTube (Alphabet), Facebook/Messenger and Instagram (Meta) reached 94%, 93% and 78% of UK online adults respectively in 2025.<sup>57</sup> At the same time, the financial sustainability of the news ecosystem is weakening and trust in news and institutions is declining. These changes create vulnerabilities at every stage of the information supply chain and new opportunities for misinformation, manipulation and foreign interference to spread at scale.

The decline of accurate and reliable journalism, the dominance of engagement-driven platforms, the increasing use of AI, foreign interference and gaps in the regulatory framework interact to create vulnerabilities across the entire information supply chain. Weakness in one part of the system can amplify risks elsewhere: unreliable information can spread more easily where accurate and reliable news sources are less visible; platform incentives can prioritise content that generates outrage or engagement; and AI is lowering the cost and increasing the scale of producing and distributing convincing synthetic content.

This matters directly to our democracy because an insecure, imbalanced and unaccountable information environment does more than expose people to individual instances of falsehood. It can erode trust, increase polarisation, undermine shared understanding of events and make citizens more susceptible to manipulation. A well-functioning democracy depends on citizens sharing a basic set of facts about the world around them. Where misleading or unreliable information proliferates, that shared basis breaks down - undermining the public's ability to hold the state to account, exercise informed agency as citizens, and trust public institutions. This is particularly urgent in the context of wider democratic decline: in 2026, 74% of the world's population lives under autocracy, up from 50% in 2005, and V-Dem has now identified the UK as an "autocratising" democracy.<sup>58</sup>

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<sup>56</sup> Demos (2026) "Epistemic Security: Information resilience priorities for 2026–2029." Demos. Hannah Perry, Azzurra Moores and Flynn Devine. 20 August 2026.

<https://demos.co.uk/research/epistemic-security-information-resilience-priorities-for-2026-2029/>

<sup>57</sup> Ofcom. (2025). *Online Nation 2025*.

<https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/online-research/online-nation/2025/online-nations-report-2025.pdf>

<sup>58</sup> Nord, M., Altman, D., Fernandes, T., Good God, A. and Lindberg, S.I. (2026) Democracy Report 2026: Unraveling The Democratic Era? University of Gothenburg: V-Dem Institute. Available at: [https://www.v-dem.net/documents/75/V-Dem\\_Institute\\_Democracy\\_Report\\_2026\\_lowres.pdf](https://www.v-dem.net/documents/75/V-Dem_Institute_Democracy_Report_2026_lowres.pdf)

Our research, in the aforementioned paper, argues that our information supply chains should be treated as democratic infrastructure: citizens and democratic institutions need access to reliable information in order for democracy to function effectively. We therefore welcome DCMS's consideration of these issues through the green paper and direct proposals to increase the public's ability to critically engage with news and other information through a new media literacy duty for PSM providers.

Q9. Public service media refers to organisations such as the BBC, ITV, Channel 4 and S4C. Which of the following statements most closely reflects your view on the role of public service media in helping people critically engage with news and other information they encounter online or offline?

- Public service media has a role in supporting critical engagement, and is currently doing enough
- Public service media has a role in supporting critical engagement, and should do more
- Public service media does not have a role in supporting critical engagement
- Public service media is currently doing too much to support critical engagement, and should do less
- Not sure

Public Service Media (PSM) already plays an important role in supporting the public's ability to critically engage with news and other information they encounter. By providing accurate, reliable and transparent journalism, PSM provides an important counterweight to the spread of misleading and unreliable information online. Indeed, PSM still remains the most used and trusted source of news for UK audiences.<sup>59</sup> The 2026 Reuters Institute Digital News Report confirms this. Even as overall trust in news has fallen to 30% - its lowest level in a decade, and 7 points below the global average - PSM institutions remain among the most trusted brands in the UK. The 2026 Reuters report found that 55% of respondents said they trusted the BBC, and 57% said they trusted ITV News and Channel 4 - figures that are significantly higher than overall levels of trust in news.<sup>60</sup> This matters because 77% of UK respondents say they are worried about misinformation, one of the highest figures of any market surveyed, underlining the scale of the gap PSM is being asked to fill.<sup>61</sup>

However, Demos believes that PSM has the potential to play a much greater role in accelerating critical engagement with news and other information. As such, we welcome the green paper's proposal to explore a media literacy duty for PSM. PSM possesses a unique combination of reach and scale that is difficult for other media literacy organisations (such as schools, voluntary organisations, and other education providers) to replicate.

<sup>59</sup> Ofcom. (2025). Public Service Media Review.

<https://www.ofcom.org.uk/tv-radio-and-on-demand/public-service-broadcasting/publicservice-media-review>

<sup>60</sup> Egan, J. (2026). *Overview and key findings of the 2026 Digital News Report*. Reuters Institute for the Study of Journalism. <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2026/dnr-executive-summary>

<sup>61</sup> Egan, J. (2026). *Overview and key findings of the 2026 Digital News Report*. Reuters Institute for the Study of Journalism. <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2026/dnr-executive-summary>

Firstly, the principle of universality is one that has been regarded by Parliament as a defining characteristic of the PSM system, even if not precisely defined in legislation.<sup>62</sup> This principle places emphasis on PSM's availability to the whole population, free at the point of use, including audiences who may not otherwise participate in media literacy initiatives delivered through schools or the voluntary sector. This is particularly important for groups who are least likely to encounter media literacy support elsewhere: older audiences no longer in education, people in areas with fewer local voluntary or civic organisations, and those who are otherwise digitally excluded. Because of its universality principle, PSM is uniquely placed to fill that void.

This is not to say good work is not already happening in this space. PSM fact-checking initiatives like BBC Verify provide transparent fact-checking and explain the evidence underpinning news reported. Additionally, PSM educational initiatives such as BBC Bitesize and the BBC Young Reporter Scheme help audiences, particularly young audiences, to develop the knowledge and skills needed to evaluate and understand media and produce their own content.

Secondly, unlike other organisations, PSM can also communicate important messages through a wide range of engaging formats, including: drama, documentaries, entertainment programming, and factual content, all alongside their digital content. As the green paper references, ITV's *Mr Bates Vs The Post Office* is a prime example of how PSM factual drama can raise public awareness of important national issues and stimulate informed public discussion. The scale of the series' reach illustrates this power: the drama became ITV's biggest new series in over a decade, with its opening episode watched by 11.6 million viewers across all devices, and the series as a whole reaching 13.5 million viewers within its first month.<sup>63</sup>

However, any future media literacy duty placed on PSM should adopt a broad, critical and citizenship-led definition of media literacy. It should not be narrowly focused on identifying misinformation, fact-checking, or protection from online harm alone. Instead, a media literacy duty should focus on people's overall ability to critically understand, evaluate, and actively participate in today's evolving media and information environment. This includes developing citizens' ability to assess the credibility of information from across the entire news ecosystem - spanning PSM, commercial news organisations, independent journalists, digital content creators, and news aggregators - as well as equipping them to understand how digital platforms, recommendation systems, and AI shape the information they

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<sup>62</sup> The explanatory notes of the Media Act (2024) state that public service content is intended to be universal. See: <https://www.legislation.gov.uk/ukpga/2024/15/notes/division/3/index.htm> The House of Lords Communications Committee has repeatedly described universality as a defining characteristic of PSM. See: <https://publications.parliament.uk/pa/ld200809/ldselect/ldcomuni/61/61.pdf> ; <https://publications.parliament.uk/pa/ld201919/ldselect/ldcomuni/16/1608.htm>. The government explicitly endorsed the principle in its response to the House of Commons DCMS Committee 2021 *Future of Public Service Broadcasting* report. See: <https://publications.parliament.uk/pa/cm5802/cmselect/cmcomeds/273/27303.htm>.

<sup>63</sup> ITV (2024) "Mr Bates vs The Post Office: 2024's Most Watched Programme." ITV Press Centre. <https://www.itv.com/presscentre/media-releases/mr-bates-vs-post-office-2024s-most-watched-programme>

encounter. Critical AI literacy should form an integral part of any PSM media literacy definition.

Additionally, any PSM media literacy duty should focus on making use of PSM's diverse and engaging formats to embed critical engagement throughout its programming, rather than confining it to dedicated educational content or requiring any new additional school or offline community outreach programming that would duplicate existing approaches provided by other parts of the media literacy education sector.

Such PSM initiatives should be guided by clear editorial criteria, incorporate a diversity of perspectives, and be transparent about any partnerships or collaborations to maintain public trust and editorial independence.

The BBC has itself recognised in its response to the ongoing Charter Review that it is uniquely placed to accelerate the public's media literacy skills through its unique reach, scale and range of formats, and has voiced support for a regulated duty in this area. Given this, and the fact that the underlying rationale applies equally across the PSM sector, it is a welcome and much-needed proposal to extend a broad, well-defined media literacy duty to all PSM organisations, rather than limiting it to the BBC alone.

**Q10 How important, if at all, do you think it is for people to be able to judge the accuracy and reliability of information they encounter, for example online or in the news?**

*Very important*

*Somewhat important*

*Not very important*

*Not at all important*

*Not sure*

In an age of deepfakes, generative AI, and widespread online disinformation, people's ability to judge whether information is accurate and reliable is an essential, everyday skill - arguably as fundamental to modern citizenship as reading and writing - for everyday citizen empowerment and the healthy functioning of democracy.

On an individual level, this ability underpins personal autonomy and good decision-making. People increasingly rely on social media and AI chatbots to find and make sense of information that shapes almost every aspect of their lives. Managing personal finances, health, employment, and who to vote for all depend on citizens' effective and up-to-date media literacy skills. The ability to evaluate sources, recognise misleading content, and verify important claims is what allows people to act on that information with confidence, rather than being exposed to harm or exploitation through false or manipulative content. As generative AI makes convincing false content cheaper and easier to produce at scale, and as consumption shifts increasingly towards social media and AI chatbots rather than professionally-edited sources, this skill is becoming more, not less, important to maintain functioning personal autonomy.

At a societal level, this ability underpins the core processes that make democracy function. Elections, public debate, and policymaking all depend on citizens' ability to distinguish credible evidence from false or misleading claims. The quality of democratic decision-making is inseparable from the quality of information available to, and understood by, citizens. Where this ability breaks down at scale, the consequences are not abstract. Research by the Institute for Strategic Dialogue (ISD) in the immediate aftermath of the 2024 Southport riots found that a post spreading a false name of the attacker received 30,000 mentions on X alone from over 18,000 unique accounts by 3pm the day after the attack, and 1.4 million views within 2 days.<sup>64</sup> At enormous scale, this weakened the shared factual basis on which democratic accountability depends. It is now widely accepted that information disorder during the Southport riots contributed and exacerbated the offline violence targeting Muslims and migrants that ensued across the UK.<sup>65</sup>

Media literacy is essential, but it can't do this job alone. Our research shows misleading content spreads faster than individuals, or even crowd-based moderation systems (such as X's Community Notes), can realistically catch and correct it. Teaching people to judge information well has to sit alongside stronger responsibilities on platforms themselves, not replace them. Teachers and other public sector and civil society workers are already stretched and on the frontline of dealing with the impacts of mis/disinformation among the public, whether or not it's part of the school curriculum. Those engaging the public with these challenges need greater support, not just in the form of funded training, but also by the platforms who can go much further in increasing the visibility of 'public interest news' information and providing the cues and tools to enable the public to navigate and evaluate information more effectively.

Q11 How valuable, if at all, do you believe collaboration between public service media, civil society organisations (for example charities and education groups), and the media sector could be in supporting people to critically assess information?

Very valuable

Somewhat valuable

Not very valuable

Not at all valuable

Not sure

Supporting people to critically assess information requires a coordinated, whole-system approach. No single organisation has the reach, expertise or resources necessary for equipping all citizens with the knowledge and skills needed to navigate today's complex media and information environment. PSM, civil society, educational institutions and the wider news media each have distinct strengths, and greater collaboration between them

<sup>64</sup> Institute for Strategic Dialogue. (2025). *ISD written evidence to the Science, Innovation and Technology Committee inquiry on social media, misinformation and harmful algorithms*.  
<https://www.isdglobal.org/wp-content/uploads/2025/01/ISD-Written-Evidence-to-the-Science-Innovation-and-Technology-Committee-Inquiry-on-Social-Media-Misinformation-and-Harmful-Algorithms.pdf>

<sup>65</sup> Science, Innovation and Technology Committee. (2024). *Social media, misinformation and harmful algorithms* (Second Report of Session 2024–25). House of Commons.  
Amnesty International. (2025). *UK: X's design and policy choices created fertile ground for inflammatory, racist narratives targeting Muslims and migrants following Southport attack*.  
<https://www.amnesty.org/en/latest/news/2025/08/xs-design-and-policies/>

would enable media literacy provision to become more effective, consistent, and wide-reaching.

PSM is well-placed to play a convening role, given its unique reach and scale, underpinned by the core principle of universality. PSM could act as a catalyst for the wider media literacy ecosystem, for example by hosting a central repository of trusted teaching resources for diverse media literacy providers, promoting existing programmes through its platforms, and using its audience reach to direct people towards specialist organisations. This would allow existing, often siloed, initiatives to reach significantly larger audiences than individual organisations could achieve alone.

However, collaboration should be designed carefully. PSM should be seen as an enabler and convenor of the wider ecosystem, rather than its sole provider. This is particularly important given longstanding concerns about the relationship between public service broadcasters and the wider media sector - debates surrounding the BBC's impact on local and independent journalism. There is the risk that PSM involvement as a convenor of media literacy could unintentionally duplicate existing provision or divert attention and resources away from smaller specialist organisations. Any expanded PSM role should therefore be grounded in a thorough assessment of where genuine gaps in provision exist, so that public investment complements rather than crowds out what already works. Given PSM's finite resources, its efforts should be focused where they add the greatest public value. We think that including a regulated duty on PSM to support media literacy could be beneficial for ensuring that PSM's contribution to media literacy is embedded as a consistent, accountable part of its remit rather than left to voluntary or ad hoc initiative.

**Q12 Which of the following models, if any, do you consider most effective for further media sector collaboration in this area?**

*Informal coordination and sharing of learning*

*A structured forum with agreed objectives and reporting*

*No additional collaboration is needed*

*Not sure*

Informal coordination has value, but given the scale of the challenge set out in our answers to Q10 and Q11, we believe a more structured model is needed to ensure collaboration is consistent, accountable, and genuinely reaches those who need it most, rather than depending on the goodwill of individual organisations.

We would go further than a structured forum alone, however. As set out in our answer to Q11, we think a regulated duty on PSM to support media literacy could be beneficial in embedding this as a consistent, accountable part of the remit rather than a voluntary add-on. We would also suggest this duty be designed as a two-way mechanism, rather than a one-directional obligation. Specifically, PSM's contribution to media literacy - for example, through the kind of convening and signposting role described in our answer to Q11 - could be recognised as an increased obligation which is rewarded with enhanced prominence on video platforms. This would create a genuine incentive for PSM to engage meaningfully with media literacy collaboration, rather than treating it as a discretionary activity.

Q12a Please provide any supporting evidence as to why you think the model(s) you selected are effective for collaboration between public service media and the media sector.

There is existing UK evidence that informal coordination on media literacy is insufficient, and that more structured models with clear objectives and reporting produce better outcomes.

The Media Literacy Taskforce, founded under the Conservative Government, illustrates the limits of informal coordination. Established by DSIT in 2022, the Taskforce brought together 17 experts from industry, civil society, the press sector and academia to advise the government. However, it has no formal reporting function, does not publish its own outputs, and its role has been limited to advising on a relatively small grant fund.<sup>66</sup>

The House of Lords Communications and Digital Committee has separately identified a persistent "lack of coordination" across the media literacy sector as one of six unresolved cross-sector challenges, despite the Taskforce's existence for several years. This suggests that convening people around a shared table is not sufficient without agreed objectives, accountability, and a mandate to report on progress, coordination risks remaining informal and low-impact.

The recent publication of the government's Media Literacy Action Plan is a positive step given it demonstrates attempts to coordinate the range of activity needed across government, but is not sufficient for ongoing coordination of activity for the sector as a whole.<sup>67</sup>

Ofcom's own media literacy strategy also doesn't go far enough. It calls for defined roles and contributions from broadcasters, platforms and civil society, rather than leaving this to ad hoc effort. However, the strategy is voluntary - it sets out goals for the sector to work towards, but places no binding requirements on providers, including PSM, to actually deliver against them. This is precisely the gap our proposal is designed to close: moving from a strategy that describes what good collaboration could look like, to a regulated duty that gives PSM a genuine incentive to make it happen.

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<sup>66</sup> Written Parliamentary Question, "Media Literacy Taskforce" (27 February 2024). UK Parliament. <https://questions-statements.parliament.uk/written-questions/detail/2024-02-27/15895/>

<sup>67</sup> DSIT, DCMS and DfE (2026) "A Safe, Informed Digital Nation." <https://www.gov.uk/government/publications/a-safe-informed-digital-nation/a-safe-informed-digital-nation>

## PROMINENCE OF PSM CONTENT IN THE PLATFORM AGE

Q22 How easy or difficult is it for you to find culturally relevant content on video platforms, including video sharing platforms like YouTube and TikTok and streaming platforms like Netflix and Amazon Prime Video? Examples of culturally relevant content could include stories set in Britain, with British presenters, representing British values or referencing British events or customs.

*Very easy – I have no issues in finding culturally relevant content on these platforms*

*Somewhat easy – I have very few issues in finding culturally relevant content on these platforms*

*Neither easy nor difficult – no opinion either way*

*Somewhat difficult – I have some issues in finding culturally relevant content on these platforms*

*Very difficult – I have a lot of issues in finding culturally relevant content on these platforms*

*Not sure*

The rationale for PSM prominence should be about ensuring that audiences can easily find content that delivers genuine civic and public value, rather than treating prominence as a proxy for promoting “UK-made” content. It is also unclear what “UK-made” is intended to mean in practice, and “culturally relevant” is similarly difficult to define consistently. Prominence should not become a production box-ticking exercise based on whether content meets an imprecise domestic label. It should instead reflect the broader purposes of PSM, including helping UK audiences understand both life in all parts of the UK *and* the wider world.<sup>68</sup>

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<sup>68</sup> Scott, M. (2026). *Is the BBC meeting its international news remit – and why should we care?*

International Broadcasting Trust.

<https://ibt.org.uk/opinion/is-the-bbc-meeting-its-international-news-remit-and-why-should-we-care/>

Q23 Prominence can be defined as giving certain content a privileged position, for example, ensuring a specific channel appears at the top of search results or features on a recommendation feed, within a user interface so it is particularly easy for audiences to find and watch. To what extent do you agree or disagree that content from public service media providers (like the BBC and Channel 4) should be easier to find on video platforms?

*- Strongly agree – it should definitely be easier to find public service media content on these platforms*

*- Agree – it should probably be easier to find public service media content on these platforms*

*- Neither agree nor disagree – no opinion either way*

*- Disagree – it should probably not be easier to find public service media content on these platforms*

*- Strongly disagree – it should definitely not be easier to find public service media content on these platforms* Not sure

Increasing the visibility of PSM providers on video platforms is best understood not as a new form of intervention, but as a necessary extension of prominence rules that already exist for PSM in other contexts. As Demos set out in *Fairer Feeds*, prominence and 'must carry' obligations have long ensured that citizens can easily access accurate and reliable information in the age of linear television.

As audiences increasingly consume news and information through video-sharing platforms rather than linear broadcast or connected TV alone, these existing protections no longer reflect how people actually access information. According to the Reuters Digital News Report 2026, online news video now reaches around half of the population each week. In 2026, for the first time, online news viewing overtook broadcast TV news.<sup>69</sup> Ofcom's own Future of Public Service Media report reached the same conclusion as to what a future prominence proposal should look like, recommending that the government bring forward legislation to secure prominence for PSM content on YouTube specifically.<sup>70</sup> Extending statutory prominence to video platforms is therefore a logical, incremental next step in updating a well-established regulatory 'must carry' principle for the platform environment, not the creation of a novel one.

Applying this extension to PSM specifically is a sensible and proportionate starting point for increasing citizen access to 'public interest news' content. PSM providers are already subject to more robust regulatory oversight for public interest news content than other media organisations under Ofcom's Broadcasting Code, and operate according to established

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<sup>69</sup> Egan, J., Robertson, C. T., Ross Arguedas, A., Newman, N., Nielsen, R. K., Mukherjee, M., & Fletcher, R. (2026, June 16). *Digital News Report 2026*. Reuters Institute for the Study of Journalism. <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2026>

<sup>70</sup> Ofcom. (2025). *Public service content should be findable on YouTube*. <https://www.ofcom.org.uk/tv-radio-and-on-demand/public-service-broadcasting/public-service-content-should-be-findable-on-youtube>

public service principles - accountability, accessibility, impartiality, independence, plurality, reliability and universalism.

However, this extension must be delivered through legislation, in keeping with how prominence has always been secured for PSM, rather than through the industry-led, voluntary agreements the green paper favours. Voluntary agreements represent a marked departure from the statutory approach that has underpinned PSM prominence to date, and this departure carries real risk: as commercial agreements, they are not subject to the transparency requirements or public interest standards that have always accompanied prominence obligations. Additionally, voluntary agreements will disadvantage smaller, independent PSM providers who have less bargaining power. For example, S4C will face greater challenges for entering into favourable agreements with platforms than the BBC, which will disadvantage the provision of Welsh-language PSM content.

### Q23a What do you see as the benefits of content from public service media providers (like the BBC and Channel 4) being easier to find on video platforms?

Making PSM content easier to find on video platforms would deliver several important public benefits.

It would help citizens meet their basic democratic information needs. As audiences increasingly shift from linear broadcast to internet-delivered viewing, the traditional prominence and "must carry" rules that historically ensured citizens could easily access accurate and reliable information no longer fit how people actually consume media. Extending prominence to the platform environment would help close this gap, ensuring PSM content remains easy to find even as viewing habits change. PSM providers are already subject to more robust regulatory oversight for public interest news content than other media organisations under Ofcom's Broadcasting Code, and operate according to established public service principles - accountability, accessibility, impartiality, independence, plurality, reliability and universalism.

It would counter the discoverability disadvantage public interest news content currently faces. Platforms' algorithmic design choices and content prioritisation processes mean that public interest news and content struggle for visibility against other, often more engagement-optimised, content. Left unaddressed, this contributes to declining referral traffic to public interest sources and threatens their long-term financial sustainability - with PSM content at particular risk of being crowded out by content optimised purely for engagement rather than public value.

It would help address the spread of misinformation. Discoverability is not just about convenience - it has real consequences for the quality of information citizens encounter. Where accurate, reliable and, editorially accountable PSM content is harder to find than lower-quality or unreliable alternatives, this contributes to the wider spread of misinformation across the information environment. Making PSM content easier to find is

therefore not just a benefit to broadcasters, but a way of directly improving the reliability of the information UK citizens are exposed to.

Additionally, prominence for PSM would bring financial benefit to the PSM ecosystem. By increasing visibility on video-sharing platforms, prominence measures could mitigate the stark decline in PSM audience viewership in recent years, which has led to significant declines in advertising revenue for commercial broadcasters such as ITV and Channel 4, whose business models rely heavily on advertising revenue.

**Q23b What types of content from public service media providers do you think should be easier to find on video platforms?**

*Arts and classical music*

*Children's*

*Comedy*

*Drama*

*Education*

*Entertainment*

*Factual entertainment*

*Feature films*

*General factual*

*News and current affairs*

*Religion and ethics*

*Soaps*

*Specialist factual*

*Sports*

*None of the above*

*Other [please specify]*

At Demos, we have called for prominence measures to prioritise PSM content of “highest civic value” on video sharing platforms.<sup>71</sup> Elsewhere, civic value for PSM providers has been defined as: “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.”<sup>72</sup>

It is important that not all PSM content is given prominence because it cannot all be considered as having equal civic value. While entertainment-focussed content, such as ITV’s Love Island or Channel 4’s Naked Attraction, attracts significant audience attention and commercial value, it cannot reasonably be understood as delivering the same level of public

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<sup>71</sup> Demos (2026). *Fairer feeds: Public interest news, prominence rules, and the future of discoverability on platforms*. Demos. (p27)

[https://demos.co.uk/wp-content/uploads/2026/06/Media-Prominence\\_Report\\_2026.pdf](https://demos.co.uk/wp-content/uploads/2026/06/Media-Prominence_Report_2026.pdf)

<sup>72</sup> 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>

empowerment in democratic processes as news and current affairs, children's content, or educational programming.

This distinction is particularly important because an approach to prominence based primarily on audience demand risks incentivising PSM providers to prioritise content that is most commercially successful, rather than content that delivers the greatest public value. Indeed news content typically receives one third to one quarter of the audience that entertainment content does (eg. 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).<sup>73</sup>

As a starting point, content of "highest civic value" should include news and current affairs, as well as children's content. In 2020, audiences rated the provision of trusted and accurate news as the single most valuable benefit that UK PSM creates both for individuals and for society overall, while visibility.<sup>74</sup> Children's content also provides important public value: ensuring its visibility gives younger audiences access to age-appropriate, educational and high-quality programming that can support their development as informed and engaged citizens.

However, we are not seeking to establish a rigid or exhaustive definition of "highest civic value", recognising that the public interest can extend beyond traditionally defined public service genres: for example, entertainment and drama can sometimes address issues of significant social importance, as demonstrated by ITV's *Mr Bates vs The Post Office*. This can be self-determined by PSBs with guidance from Ofcom.

The principle should therefore be that prominence is not simply a reward for popularity. It should ensure that content which makes a particularly important contribution to the democratic, social and educational purposes of PSM remains discoverable and accessible, even where that content does not generate the largest audiences.

### Q23c On which video platforms do you think content from public service media providers should be easier to find?

The green paper acknowledges that, to fulfil the PSM principle of universalism, PSM content needs to be made more prominent on the platforms and devices where audiences are currently at. This means that, in line with the latest figures on news video consumption habits, PSM content should be made more prominent on Facebook, YouTube, and Instagram.

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<sup>73</sup> 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-bygenre-in-the-uk>

<sup>74</sup> Ofcom. (2020). *Small Screen: Big Debate consultation: The future of public service media*.  
<https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/208895-future-of-psb/consultation/consultation-future-of-public-service-media.pdf>

Indeed, as evidenced in the 2026 Reuters Digital News Report,<sup>75</sup> the third-party video-sharing platforms attracting the highest proportions of European audiences for weekly online news video consumption are: Facebook (31%), YouTube (24%), and Instagram (18%). These figures include UK audiences.

To do so, the government should establish a new regime for Video Sharing Platforms under the Media Act, drawing on the definition for video-sharing platforms that is embedded in UK law via the EU Audiovisual Media Services Directive.

However, the video-sharing platforms considered within scope of PSM prominence rules should be reviewed at regular intervals to ensure that the regime remains relevant for audiences news video consumption habits. As such, to achieve the Green Paper's "future-proofed" principle, the government should give Ofcom the power to determine which platforms fall within scope of a new Video Sharing Platform regime, and to review them in line with media consumption habits.

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<sup>75</sup> Egan, J., Robertson, C. T., Ross Arguedas, A., Newman, N., Nielsen, R. K., Mukherjee, M., & Fletcher, R. (2026, June 16). *Digital News Report 2026*. Reuters Institute for the Study of Journalism.  
<https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2026>