



## Media Reform Coalition – Submission to House of Lords Communications Committee inquiry

### The Future of News: Impartiality, trust and technology

February 2024

#### Executive summary

1. Since 2011, the Media Reform Coalition has been at the forefront of the media reform movement in the UK, producing evidence and giving expert testimony to numerous public enquiries into the media. Our particular concerns relate to media accountability, media pluralism and diversity, independent public interest journalism and the future of public service media. The MRC has been researching the crisis in local news and the impact of new technology platforms for many years, and published extensive original research on media ownership, local news closures, the future of journalism and the alternative funding solutions.<sup>1</sup>
2. Search engines, social media and news aggregators have fundamentally altered how most news organisations produce, curate, distribute and monetise their news content. These platforms have also changed how audiences discover, access and interact with news in the online environment, with Facebook, YouTube, Google, X/Twitter and Instagram now central to many individuals' everyday news consumption.
3. The opaque processes that platforms use to distribute and curate content supplied by news organisations similarly risk exacerbating the UK's crisis in media plurality and low news diversity. While journalistic harms such as misinformation, disinformation and inaccurate reporting are by no means unique to online news, the incentives for traditional news organisations to create such content are clearly amplified by the financial and distributional structures created by large technology platforms.
4. **The current regulatory environment for media plurality needs to be enhanced to account for the significant role that large technology platforms and online intermediaries play in the production, distribution, curation and funding of news. Ofcom needs to develop new assessment criteria to account for the ways in which these platforms can amplify the reach and market share of dominant 'traditional' news outlets in the online environment, and thus worsen the concentration in cross-media ownership – even where these outlets appear to have a smaller or diminished presence in their traditional markets.**
5. **Parliament should also examine the opportunities for introducing clear legislative thresholds for triggering interventions on media plurality across both news and online intermediaries involved in the distribution of news. This should be paired with explicit guidance on the kinds of remedies that can be imposed if a single media owner or platform breaches those thresholds, such as forced divestment or the imposition of public obligations, such as**

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<sup>1</sup> See [mediareform.org.uk](https://mediareform.org.uk) for a record of our publications and past consultation submissions.

**investment in new funding sources for public interest journalism or requirements on platforms to boost the discovery of public service news.**

6. While there is much hype about AI (both positive and negative), there is currently little concrete empirical research on its impact on the daily practices of news production. It is currently unclear whether newsrooms are undertaking algorithmic audits and impact assessments or implementing ethics review boards. Nor is it clear the extent to which news regulators are preparing to address the need for responsible AI. **There is an urgent need for a) further research into the applications and impact of AI to investigate the issue in full; b) public transparency and clear labelling within news organisations regarding the multiple ways in which AI is used in news production; c) policy development around the governance of generative AI in news production processes to protect democratic values.**
7. Recent global surveys point to a general decline in journalism's authority and legitimacy. Policy and institutional decisions to subordinate all areas of mediated activity to market logic and competition – leading to ever-more commercialisation, privatisation, restructuring and redundancies – provides the broader context for the faltering trust in news and journalism.
8. **An essential starting point for rebuilding trust in news is strengthening the media's independence – such as by removing the Government's ability to directly appoint the Chair of the BBC or Channel 4, and replacing these appointments with an independent transparent process with direct public participation. Ofcom should also take a more robust approach to preserving the existing impartiality rules within broadcasting.** This is particularly necessary in light of the changing media landscape and in particular the emergence of television 'news' channels such as TalkTV and GB News, which have persistently breached news standards with effective recourse by the regulator.
9. **Increasing trust, revitalising journalism and democratising public media will require far deeper structural changes to public service broadcasting than are likely to be achieved in the Media Bill. There are, however, a number of specific measures that would aid in this process: removing the discretionary powers of the Secretary of State over funding, quotas, regulatory frameworks and public media appointments; creating new mechanisms for direct public participation in programming making, public funding allocations and editorial oversight of PSBs' output; and creating a legislative expectation on the Government to conduct reviews into the future democratisation of public media, particularly in advance of the forthcoming BBC Charter Review in 2027.**

## Key questions

*Trends over the next 12 months and 5 years*

1. What impacts (positive and negative) do large technology platforms and online news aggregators have on the UK's news environment, including media plurality? And how might this change?

10. Search engines, social media and news aggregators have fundamentally altered how most news organisations produce, curate, distribute and monetise their news content. These platforms have also changed how audiences discover, access and interact with news in the online environment, with Facebook, YouTube, Google, X/Twitter and Instagram now central to many individuals' everyday news consumption. Approximately two-thirds of the UK public regularly use an online intermediary to access news, while Ofcom reports that 83% of 16-24 year-olds use online platforms as a regular source for news – substantially more than those in that age bracket using TV (47%), radio (25%) or print newspapers (16%).<sup>2</sup>
11. However, while the conveniences offered by these platforms are widely known, any such advantages cannot be separated from the wider transformations caused by 'Big Tech' that are seriously harming the UK's news and information environment. Many of these harms derive from the dangerously concentrated levels of ownership across the major technologies and platforms that dominate the online news landscape. 10 of the top 15 online platforms used to access news in the UK are owned by Meta, Google and X Corp (owners of X/Twitter). Across all UK users who access news online, 72% use services controlled by Meta and 71% use services owned by Alphabet. Compared to the cross-platform retail share of news across the UK media landscape, these same three Big Tech companies are used for news by larger audiences than many of the UK's major broadcast and print media outlets.<sup>3</sup>
12. Although these dominant tech platforms do not themselves produce news content, they are not 'neutral' intermediaries that provide an equal platform for all news providers. Rather than enhancing news media diversity, platforms reflect and entrench the existing patterns of extreme concentrations in ownership that already characterise the UK's news landscape. In the case of both the top UK online 'newsbrands' and the most followed news organisations on social media platforms, a small handful of corporate news publishers and broadcast networks attract an outsized share of audience reach, despite these spaces being populated by many thousands of other outlets and millions of individual users.<sup>4</sup>
13. Online intermediaries are further harming the sustainability of the UK news landscape through the near-total monopolisation of how online news is found, distributed and funded. Google holds a 93% share of the UK search engine market, and in 2020 the CMA estimated that at least 40% of web traffic to UK news publishers' websites came via Google and Facebook.<sup>5</sup> These two companies also dominate the online advertising markets, accounting for approximately £20.8bn or 59% of the total UK spend on all advertising in 2022.<sup>6</sup> While traditional revenue sources for news publishers are in a sustained decline, the control these two tech giants hold over digital advertising poses a severe threat to both fair competition and sustainable funding for public interest journalism. Ofcom figures indicate that while print advertising revenues for newspaper publishers fell by 36% from 2019 to 2021, in that same period digital advertising revenues rose by 11%, comprising an increasingly significant share of falling total revenues.<sup>7</sup> Large publishers, new online news outlets and independent journalists alike are increasingly

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<sup>2</sup> Ipsos/Ofcom, [Media Plurality Quantitative Report](#) October 2022, pg. 10; Ofcom, [News consumption in the UK 2023 report](#), pg. 4.

<sup>3</sup> MRC 2023 analysis based on data from [Ofcom News Consumption in the UK 2023 Report](#).

<sup>4</sup> Media Reform Coalition, ['Who Owns the UK Media? 2023 Report'](#) pgs. 9-10.

<sup>5</sup> CMA, [Online platforms and digital advertising market study Appendix 5](#), pg. 6.

<sup>6</sup> MRC analysis based on [Advertising Association/WARC Expenditure Report FY2022](#).

<sup>7</sup> Ofcom [Media plurality and online news: Discussion document](#), pg. 14.

dependent on a digital advertising market that is controlled and operated by the same companies that they already depend on to get their content seen by and distributed to audiences.

14. The opaque processes that platforms use to distribute and curate content supplied by news organisations similarly risk exacerbating the UK's crisis in media plurality and low news diversity. Large platforms like Google News and Facebook have slowly introduced more guided forms of automated curation and editorial sorting, intended to promote 'high quality' news outlets, screen unreliable or inaccurate information and provide users trusted sources to supplement their own customised or algorithm-led consumption. However, the news content that platforms prioritise are often sourced from the same dominant news organisations that control large shares of traditional news markets. The criteria that these companies use to grant content a 'trusted' or 'high quality' status are often misleading normative ideas about institutional reputation (i.e. the age or legacy branding of an outlet) rather than afforded on the basis of assessments of accuracy, quality or independence.<sup>8</sup>
15. Structural transformations in the news environment created by online platforms have also prompted harmful behaviours and practices from news organisations themselves. The logics that define online platforms may have a significant diminishing effect on the production and distribution of high-quality news, as news outlets prioritise creating content that is highly shareable, engaging or misleading rather than original, informative or accurate in order to attract high webpage traffic and thus higher digital advertising impressions.<sup>9</sup> While journalistic harms such as misinformation, disinformation and inaccurate reporting are by no means unique to online news, the incentives for traditional news organisations to create such content are clearly amplified by the financial and distributional structures created by large technology platforms.

## **2. How is generative AI affecting news media business models and how might this evolve?**

16. The use of AI in the production of news has caused both alarm (how will generative text ever be checked or verified?) and excitement (over the journalistic possibilities of the immediate processing of huge swathes of data). In an industry that has struggled financially, AI is much cheaper and faster than hiring a journalist. But AI also has no commitment to the truth of an argument or accuracy of an observation; it is only imitating their likeness as discovered in data available to it. It has been used to create profile pictures of nonexistent journalists (using an AI-powered method termed 'deepfake'), source quotes, summarise reports, suggest questions for interviews, and to write headlines or entire articles based on a user's prompts. AI-powered journalism may well (quickly) become a form of supercharged 'churnalism' based not on one single press release but on a form of 'news engineering' where articles from millions of digital unverified texts are woven together to create a (relatively) seamless report. If the content is not badged as 'AI generated', then readers will have no idea that the news they consume has not been subject to the usual processes of verification. News from everywhere quickly becomes news from nowhere.

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<sup>8</sup> See Nechushtai and Lewis (2019) [What kind of news gatekeepers do we want machines to be? Filter bubbles, fragmentation, the normative dimensions of algorithmic recommendations](#), *Computers in Human Behaviour* 90.

<sup>9</sup> See Lecheler and Egelhofer (2022) [Disinformation, misinformation, and fake news](#), pg. 76.

17. As AI functions on the texts it finds based on past patterns which it then replicates, it can also endlessly reproduce systemic inequalities, biases and structural discrimination that exist on the web.<sup>10</sup> Without full transparency and the right level of safeguards, including independent and effective press regulation, there is a huge risk that AI will perpetuate and further instil old injustices while introducing new ones – all in the form of news.
18. The economic consequences of AI could be far-reaching. Geoffrey Hinton (referred to by some as the ‘Godfather of AI’) quit Google in May 2023 in order to speak freely about the dangers of AI. In the same month, IBM CEO Arvind Krishna told Bloomberg that up to 30% of the company’s back-office roles could be replaced by AI and automation within five years.<sup>11</sup> In a cash-strapped news industry, AI holds much allure. In June 2020, dozens of news production contractors at Microsoft’s MSN were sacked and replaced by AI. These staff were not reporters in the traditional journalistic sense, but they did exercise some editorial control—it was their job to curate stories from other news organisations (the sorts of practices that have been criticised as extracting value from legacy news organisations), writing headlines, and selecting pictures to accompany the articles. These roles are now performed by algorithms that identify trending news stories and try to optimise the amount of pageviews any particular content receives.
19. Whereas in relation to news, Google explicitly states that it is not driven by commercial imperatives, when it comes to advertising algorithms the opposite is true. Google is the largest advertising company in the world. It posts ads by placing them on its own site and on external sites in the Google Display Network. The more ads Google places, the more money it makes and it does not differentiate between those that are trustworthy and those that are not. In doing so, Google is providing a financial incentive for these sites to bring in as much web traffic as possible, even if it comes by way of mal or disinformation.
20. In September 2019, a UK nonprofit called the Global Disinformation Index (GDI) released a report analysing ad placement on fake news sites.<sup>12</sup> They collected a list of 1700 websites that had been flagged by fact-checking organisations for publishing content that included fake news, finding that Google was serving up ads on 70% of these sites. GDI estimated that the fake news industry brought in nearly \$250m in 2019 – of which Google alone was responsible for \$87m, some 40% of the fake news industry’s revenue that year. This was almost the same share of ad revenue that Google was responsible for among mainstream legacy news sites. In other words, in terms of the advertising market Google does not differentiate.
21. Facebook also built its massive platform by designing algorithms to maximise user engagement at all costs. Many studies<sup>13</sup> have concluded that algorithms designed to maximise engagement also increase polarisation and amplify far-right content. A study of the 2020 US Presidential election found that far-right content generated more engagement than any other partisan group, and far-right misinformation

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<sup>10</sup> See Chun and Barnett (2021) Discriminating data: correlation neighborhoods and the new politics of recognition; and Mitchell et al., (2021) [Algorithmic Fairness: Choices, Assumptions and Definitions](#) in Annual Review of Statistics and its Application 8(1) 141-163

<sup>11</sup> Ford, B. (2023) [IBM to pause hiring for jobs that AI could do](#).

<sup>12</sup> Global Disinformation Index, [Follow the money – how disinformation has become a big business?](#).

<sup>13</sup> See Anspach (2021) [Trumping the equality norm? Presidential tweets and revealed racial attitudes](#); and Kim et al., (2021) [The Distorting Prism of Social Media](#).

generated 65% more engagement than far-right factual content. This means that any recommendation/ranking algorithm, using engagement as the metric it aims to maximise, will prioritise far-right misinformation above all else.<sup>14</sup> Some platforms have introduced ad and publishing policies that attempt to defund disinformation and address hate speech, discriminatory and anti-science content. However, they lack sophistication and are rarely transparent, fair or effective.

22. Algorithms and AI are not the same, but algorithms are the building blocks of AI. Algorithms and data teach computers how to learn and perform specific tasks. As such AI has a tendency to perpetuate and amplify biases in respect of things like ‘race’ and gender. A business model designed to maximise profit with little concern for the public good is unlikely to design algorithms for democratic intent.
23. While there is much hype about AI (both positive and negative), there is currently little concrete empirical research on its impact on the daily practices of news production. Similarly, it is currently unclear whether newsrooms are undertaking algorithmic audits and impact assessments or implementing ethics review boards. Neither is it clear the extent to which news regulators are preparing to address the need for responsible AI. There is an urgent need for a) further research in this area in order to investigate the issue in full; b) public transparency and clear labelling within news organisations regarding the multiple ways in which AI is used in news production; c) policy development around the governance of generative AI in news production processes to protect democratic values.

### **3. How are perceptions of due impartiality evolving and what challenges do news organisations face around impartial reporting?**

This question is covered in paragraphs 44-48 and 52-60 below.

### **4. What factors affect trust in news and how might this evolve?**

24. Recent global surveys point to a general decline in journalism’s authority and legitimacy. For example, the Reuters Institute Digital News Report (based on 46 countries in six continents) notes that overall trust in the news continues to fall with a further 2% decline in 2023.<sup>15</sup> Finland enjoys the highest levels of overall trust in the news (69%), while Greece is at the bottom of the league with just 19%. They also note that interest in news more generally has fallen sharply across markets, from 63% in 2017 to 48% in 2023 with people becoming increasingly disconnected from news as concerns about false and misleading information remain a constant worry.
25. While surveys on trust in news are rarely comparable to each other, they do give us some hints as to why trust in journalists, journalism and news in general has declined. They tell us that news audiences often believe that, despite the claims of journalism to be an institution that supports and strengthens democracy, too often it is found guilty of the opposite – of being unrepresentative of marginalised groups and discriminatory, or of valuing commercial imperatives above journalistic integrity.
26. However, such studies also have a tendency to encourage a reductive news-centric approach that evades a broader and deeper understanding of the news as part of the social and political context it

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<sup>14</sup> Edelson et al. (2021) [Far Right News Sources on Facebook More Engaging](#).

<sup>15</sup> Reuters Institute [Digital News Report 2023](#).

exists within. Distrust is not simply related to the changing contexts of news. Rather, it is firmly located in a broader and more general political economic context that requires much deeper consideration. For example, discontent with democracy has been associated with perceptions of whether or not the economy is perceived to be working well. The Pew Research Centre found that in 24 out of 27 countries surveyed, people who say the national economy is in bad shape are more likely than those who say it is in good shape to be dissatisfied with the way democracy is working.<sup>16</sup> In 26 of 27 nations, those who believed their country to be one in which most people cannot improve their standard of living were more likely to be dissatisfied with the way democracy is working. In other words, when levels of social and economic disenfranchisement are high and inequalities in general are widespread, then levels of discontent and distrust are likely to be higher too.

#### **4a. To what extent is trust linked to perceptions of impartiality, or to other trends in online news?**

27. As more and more people access their news via the internet and social media,<sup>17</sup> the 2021 European Broadcasting Union survey<sup>18</sup> – based on 33 countries in Europe (including EU states as well as acceding and candidate countries) – found that the majority of European citizens do not trust the internet and, even more so, social networks. They also note that public service broadcasters remain the most trusted news in more than 60% of countries in their survey. They align trust in broadcast media with a free and independent media landscape and claim that the more citizens perceive public service media in their country to be free from political pressure, the higher the level of trust in the information provided by national media in general. In addition, the more citizens think that their national public service media are independent, the more they trust the news it produces. Radio and TV continue to be the most trusted media throughout Europe. By contrast, social networks appear to be least trusted in 32 countries. They also note a positive correlation between trust in news and the degree to which citizens are convinced that their national media cover a diversity of views and opinions, arguing that citizens seem to value a national news media landscape which upholds ideals of impartiality in the news.
28. The literature on trust<sup>19</sup> also notes that a citizen can form evidence-based opinions about the ability of the governance system to promote trustworthy conduct (and prevent breaches of trust) through a mix of incentives and safeguards (which can be formal or informal in nature). An important consequence of this is that trust in actors themselves may not be necessary, provided that citizens can reasonably trust the governance system itself. Whereas a degree of citizen cynicism towards news and journalism might be expected, higher trust is more likely when a system of independent governance and accountability exists. Similarly, where there are low levels of trust in politicians but the ability of systems of governance to protect the rights of those who are excluded from political power are visible, then trust may be maintained. Where these do not exist then trust diminishes.
29. In a digital media landscape, it is also vital to understand the specific configuration of news and information intermediaries that can orient a given public in the identification, prioritisation, and interpretation of information. This raises concerns about echo chambers and filter bubbles that may close people off from a more diverse range of perspectives and celebrity influencers that may intensify

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<sup>16</sup> Pew Research Centre, '[Many across the globe are dissatisfied with how democracy is working](#)', 29 April 2019.

<sup>17</sup> See [Ofcom News consumption in the UK 2023](#).

<sup>18</sup> European Broadcasting Union, '[Market Insights: Trust in Media 2021](#)', September 2021.

<sup>19</sup> Eg. Misztal (1996) 'Trust in Modern Societies'; Hardon (2006) 'Trust'; Luhmann (2018) 'Trust and Power'

possibilities for information manipulation. Or digital platforms may simply overwhelm citizens with incessant information pollution such that it becomes impossible to establish confidence in systems of governance leaving people disoriented and unable to find a means of trusting anything in the public sphere.

30. Ofcom notes that there are real concerns about the impact of online intermediaries, and in particular social media platforms, on media plurality. It found that “people who most often use social media to access news are less likely to correctly identify important factual information, feel more antipathy towards people who hold different political views and are less trusting of democratic institutions, than people who use TV and newspapers most often as a source of news”.<sup>20</sup> Other studies have shown that people who use social media to access news tend to express lower levels of political trust. Furthermore, an increase in social media use as a source of news at the national level is associated with a decrease in trust in the news media in general.
31. What is clear, from a host of literature on trust from different fields, is that it is deeply contextual and path-dependent, embedded in histories of political culture and the integrity of news and information ecosystems more broadly. Convergent shifts in cultural production, journalism, political communication, marketing and data mining have contributed to the emergence of a mediated regime facilitated by deregulated, highly commodified, affective and ever faster forms of communication such that news now stands accused of trafficking in trivialities and repackaged public relations material. This direction of travel, traceable across at least the last forty years, to subjugate *all* areas of mediated activity to market logic and competition through ever-more commercialisation, privatisation and restructuring is the broader context in which we see trust in news and journalism falter.

#### **4b. What impact do concerns around disinformation have on trust in the information environment? (And to what extent does this differ between different sections of society?)**

32. In 2018, two years after ‘fake news’ entered general discourse in 2016 (amidst the election of Donald Trump in the US and the Brexit Referendum in the UK), the Edelman Trust Barometer noted that 63% of people globally said that the average person does not know how to tell rumour from falsehoods.<sup>21</sup> The same survey also revealed that 33% of people are reading or listening to the news less and 19% are avoiding the news altogether because they see it as too depressing (40%), too one-side or biased (33%) or controlled by hidden agendas (27%). 66% of people said that news organisations were more concerned with attracting a big audience than reporting accurately.
33. The 2023 Edelman Trust Barometer reported that the media were distrusted in 56% of the 27 countries they surveyed and that levels of trust had dropped in 21 of those countries since the previous year.<sup>22</sup> They note that government and media are seen as the largest sources of false or misleading information by 46% and 42% respectively of people globally (excluding China and Thailand). They also revealed a clear class divide with those in lower socioeconomic groups trusting far less than those in higher socioeconomic groups in the majority of the countries surveyed. The report points to distrust, lack of shared identity and systemic unfairness as drivers of polarisation, followed by economic pessimism,

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<sup>20</sup> Ofcom [Media plurality and online news: Discussion document](#), pg. 2.

<sup>21</sup> [Edelman Trust Barometer 2018](#).

<sup>22</sup> [Edelman Trust Barometer 2023](#).



societal fears and distrust in media. The same survey also noted that in the UK only 25% of the population said they trusted the media to do what is right (a 10 point drop from 2020) and only 27% trusted the Government (a seven year low). 57% of people felt that their interests were not represented in British politics and 70% felt that Government prioritised its own supporters over those in most need.

34. In 2023, the Reuters Institute reported on a qualitative analysis of trust in digital news<sup>23</sup> based on 41 focus groups in Brazil, India, the United Kingdom, and the United States, markets which account for more than one billion internet users and a wide range of media systems and contexts – strategically selecting participants from disadvantaged communities (based on race, caste, religion, class, and place) to understand how they may differ from dominant groups in their expectations around news. The analysis supported other research in the field that notes a general scepticism towards all news media with a deep suspicion about bias and commercial or political influence in news production. These ideas emanated from identifying as part of a group that is marginalised or situated far from the centres of power, with the stakes of under- or misrepresentation often being far higher than those of privileged audiences and palpable sources of harm to those who are already disadvantaged in society. Lack of trust in news cannot be understood without first understanding the levels of social and political marginalisation people feel in general.
35. A journalism that is independent, accountable, democratic and not in thrall to elites is the way to rebuild trust. News outlets need to define practices that have brought the journalism profession into disrepute as professionally and socially unacceptable. They need to be willing enthusiasts for independent and effective regulation so that their practices are open to challenge and subject to scrutiny. Independence means independence from government control but also securing the independence of news and information provision from commercial interests. Until journalists are willing to recognise that freedom of the press must be balanced by freedom of the public to assess and challenge the nature of that communication, trust in journalism is unlikely to be rebuilt.
36. Until journalism is able to hold its own institutions of power to account, to expose its own malpractices and to challenge some of the most obvious abuses of media power, *distrust* in news journalism is likely to grow. And if we want to ensure that big data is captured for the public good and that technological innovation of the future helps solve our most urgent problems – from climate destruction to gross inequalities – rather than intensify them, then we must radically transform the governance and ownership of digitally generated data and its underlying infrastructure.

### *Evaluation*

#### **1. How well are news organisations responding to factors affecting their business models, and are any changes needed?**

37. News organisations are facing a range of challenges and high levels of volatility. In response they are seeking further to streamline their costs with job cuts and rationalisation that risk further undermining their ability to provide high-quality and trusted news. According to the Reuters Institute for

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<sup>23</sup> Reuters Institute, [‘News for the powerful and privileged: how misrepresentation and underrepresentation of disadvantaged communities undermine their trust in news’](#), 18 April 2023.

Journalism’s annual report on journalism trends and predictions, only a minority of their sample of editors, CEOs and digital executives expressed confidence about the year ahead with many noting concerns particularly in relation to “rising costs, declining advertising revenue, and a slowing in [digital] subscription growth”.<sup>24</sup> This coincides with further falls in print circulation with double-digit declines during 2023 for many titles including the Mail, Express and Mirror titles, Evening Standard, Financial Times, Star and Sunday People.<sup>25</sup>

38. 63% of the Reuters sample identified a sharp decline in referrals from social media sites, particularly X and Facebook, that are forcing them to look elsewhere for traffic, notably WhatsApp and TikTok and Instagram, new and highly unpredictable hunting grounds for news.<sup>26</sup> Significantly, nearly two-thirds of the sample said that their news organisation was planning to invest more in video as opposed to traditional articles. The CEO of Reach promised that it would adapt to the new environment by spending more on short-form video “designed to appeal to a younger audience led by social media influencers”.<sup>27</sup>
39. However the partial withdrawal from news by Meta, for example the scrapping of Instant Articles and Facebook News, has already impacted the digital readership of Reach titles. The company’s reaction – as well as promising to invest more on video – was to introduce yet further cuts with 300 journalists set to lose their jobs with an expected total number of redundancies of around 800 in 2023 alone. The National Union of Journalists has rightly criticised the cuts and the company’s ill thought through ‘dash to digital’: “Stability and diversification of the business to bring in new income streams are needed that have quality journalism at their heart”.<sup>28</sup> We believe that investment in quality news is still needed and that click-bait will not prove to be a sustainable business model for major news titles.
40. The cuts at Reach are simply one part of an epidemic of job cuts with 7,961 job losses announced in 2023 in UK, US and Canadian news outlets and further consolidation of back-office operations, not least in printing which is likely to lead to yet more redundancies.<sup>29</sup> These cuts are neither wholly necessary nor justifiable. According to Enders Analysis, UK newspaper titles are “sprouting green shoots of recovery in the transition to digital” with improvements to profit margins shown by many outlets.<sup>30</sup> Broadsheets have added approximately two million digital subscriptions since the pandemic but, despite the significant drop in print circulation, tabloids continue to exercise a very significant role in British public life with advertising-dependent titles like the Sun and the Mail reaching some 33 million unique visitors each month in the UK.
41. The strategy recommended by Enders is to further internationalise, given the success of the Mail (ranked 12th in US news websites) and the Guardian (ranked 18th) and recent investments by the Sun, Mirror and the BBC. Yet along with the shift towards video (and video sharing sites), we believe that this risks undermining their commitment to focus on UK-specific breaking stories as opposed to

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<sup>24</sup> Reuters Institute Digital News Project, [‘Journalism, media and technology trends and predictions 2024’](#).

<sup>25</sup> Press Gazette, [‘National press ABCs: Daily Mail and FT grow sales month on month in December’](#), 19 January 2024.

<sup>26</sup> Reuters Institute Digital News Project, [‘Journalism, media and technology trends and predictions 2024’](#).

<sup>27</sup> Financial Times, [‘Mirror publisher Reach to cut 450 jobs after Meta pulls back from news’](#), 8 November 2023.

<sup>28</sup> NUJ [‘Open letter to Reach independent directors & shareholders’](#), 30 November 2023.

<sup>29</sup> Press Gazette, ‘At least 8,000 journalism job cuts in UK and North America in 2023’, 4 January 2024.

<sup>30</sup> Enders Analysis, [‘UK national news industry: Green shoots of recovery’](#), 16 January 2024.

lifestyle and celebrity content. The pursuit of new audiences and ‘soft power’ should not compromise their commitment to provide relevant news and opinion to core audiences in the UK.

42. While digital subscriptions are still rising (even if the rate of increase is slowing down), advertising remains a significant revenue stream for many news organisations. Yet this is a sector increasingly dominated by tech giants with both Google and Meta reporting substantial growth in advertising revenue in 2023 and, with Enders Analysis forecasting the return to a sector with “tech platforms strongly outperforming the open web and smaller publishers”.<sup>31</sup>
43. As we have already discussed, there is a further threat to sustainability given the potential rise of AI and the reluctance, or rather refusal, thus far by tech companies to pay traditional content creators for their data. The New York Times has famously sued OpenAI and Microsoft for copyright infringement while, in February 2024, the Financial Times reported that the UK had scrapped plans to introduce rules on the use of copyrighted material by AI models.<sup>32</sup> The FT talks of an ‘impasse’ between legacy and new AI platforms, a battle which largely bypasses ordinary publics who are being marginalised while government seeks both to protect traditional content companies and to stimulate AI-generated innovation.

**2. How adequately are UK news organisations providing impartial and trusted news? What actions are needed to address any shortcomings? How should news organisations balance competing demands to provide content that aligns with particular values on the one hand, and provides trusted and impartial news on the other?**

44. Some of the trends described earlier – the scale of job cuts, the move to video and the desire to internationalise – are likely to exacerbate decreasing levels of trust in the news given that the UK has fallen to the bottom of the annual Edelman Trust Barometer with only 31% of the public indicating trust in the media in its 2024 survey, down from 37% the previous year.<sup>33</sup> A 2023 YouGov survey found that 75% of UK adults polled expressed none or ‘not much’ trust in journalists ‘to tell the truth’ – a figure that cuts across every demographic and voter.<sup>34</sup>
45. In the case of the public service broadcasters (the BBC, ITV, Channel 4), their news provision is governed by the terms of the Ofcom Broadcasting Code, which are intended to ensure that the news they deliver is accurate, trustworthy and duly impartial. But these are not only the terms of Code – they are also what is expected of any journalism which adheres to, or claims to adhere to, Fourth Estate principles.
46. We are often told, not least by the BBC, that theirs is the most trusted news brand but, according to a YouGov survey in July 2023, a majority of those polled distrusted both the Corporation and its journalists with only 8% expressing ‘a great deal’ of trust in the BBC. This followed another YouGov survey earlier in 2023 that found that the BBC (along with the Financial Times) was indeed the most

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<sup>31</sup> Enders Analysis, [‘Google and Meta pull away: Strong results leave publishers behind’](#), 27 October 2023.

<sup>32</sup> Financial Times, [‘New York Times sues Microsoft and OpenAI in copyright case’](#), 27 December 2023; Financial Times, [‘UK shelves proposed AI copyright code in blow to creative industries’](#), 4 February 2024.

<sup>33</sup> Edelman [Trust Barometer 2024](#), fieldwork conducted 3-22 November 2023, pg.8.

<sup>34</sup> YouGov [Survey results 13-14<sup>th</sup> July 2023](#)

trusted news source in the UK with a 22% net trust score.<sup>35</sup> Both surveys are in marked contrast to the Reuters 2023 Digital News Report which indicates much higher levels of trust not just for the BBC but a range of other ‘quality’ providers such as Channel 4 News, Financial Times, Guardian, Sky News and The Times.<sup>36</sup>

47. Whichever index is more accurate, it is clear that public perception of UK journalism as a whole has been significantly affected by the notion that it is prone either to unethical behaviour or to government capture. For example, academics Greg Philo and Mike Berry examined public service broadcasting coverage of the early days of the Covid pandemic and concluded that “elite political journalism’s close integration with the Government’s communication machine” undermined their ability to provide trusted and independent news.<sup>37</sup> The finding by Mr Justice Fancourt in December 2023 that Mirror Group Newspapers had engaged in “extensive” phone hacking of Prince Harry demonstrates that the scandal is far from over and is likely further to lower the reputation of journalists more broadly in the UK landscape.<sup>38</sup> This is not a trend confined only to ‘tabloid’ titles but part of a more general decline in credibility which Press Gazette described as a “crisis of trust”.<sup>39</sup>
48. News organisations need therefore to rebuild their reputations and their connections to readers, viewers and listeners. This will be difficult if, as stated above, the knee-jerk response of companies is to lay off journalists and invest more heavily in video as if that will immediately pay dividends (in terms of trust, not profits) given the levels of competition in that field. The problem is particularly stark in relation to local news where, as we argued in our 2023 ‘Who Owns the UK Media?’ report, “the prevalence of news ‘droughts’ and ‘deserts’ across the UK is accompanied by continuing job cuts, redundancies and consolidated newsrooms”.<sup>40</sup>
49. Reuters Institute researchers have identified a demand in the UK for editorial strategies to build trust, including “more attention paid to regular, everyday people, more solutions-focused coverage, and less sensationalism and inaccuracy”.<sup>41</sup> They also found that most people blamed management and ownership issues for flawed news coverage which, in the context of the UK’s heavily concentrated news landscape and its poor record on press self-regulation, does not bode well for seeing increased levels of trust any time soon.<sup>42</sup>

### **3. How adequately are news media organisations ensuring that efforts to provide trusted information and tackle disinformation do not alienate some sections of society in the process?**

50. It is hardly surprising that hyper-partisan sections of the media specialising in the propagation of mis- and dis-information should be concerned about developments such as the BBC’s Trusted News Initiative, Verify and Reality Check, and the appointment of disinformation correspondent Marianna

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<sup>35</sup> YouGov [Survey results 13-14<sup>th</sup> July 2023](#); YouGov, [‘Which media outlets do Britons trust in 2023?’](#), 25 May 2023.

<sup>36</sup> [Reuters Digital News Report 2023](#).

<sup>37</sup> Philo and Berry, [‘We need to start building up what’s called herd immunity’: Scientific dissensus and public broadcasting in the Covid-19 pandemic](#), British Journal of Sociology 74:3.

<sup>38</sup> Guardian, [‘Prince Harry v Mirror Group: key findings of the phone-hacking case’](#), 15 December 2023.

<sup>39</sup> Press Gazette, [‘Five-year decline in UK news media trust sees BBC, Times and Telegraph have biggest drops’](#), 30 September 2022.

<sup>40</sup> Media Reform Coalition, [‘Who Owns the UK Media? 2023 Report’](#)

<sup>41</sup> Reuters Institute, [‘Strategies for Building Trust in News: What the public say they want across four countries’](#), 2023.

<sup>42</sup> Hacked Off [‘IPSO: Five years of failure’](#).

Spring. Take, for example, GB News's Mark Dolan who described the BBC as "among the worst culprits of disinformation" during the Covid-19 pandemic, and characterised Spring's appointment as "a propaganda tool that you and I are paying for".<sup>43</sup>

51. Nor are such complaints limited to this quarter, being frequently voiced in *The Spectator* and in various partisan newspapers by the likes of Charles Moore, Toby Young and Rod Liddle. An example of the level of the 'critique' to which such fact-checking initiatives are habitually and typically subjected can be gleaned from Liddle's column in *The Times*, 9 September 2023, in which he declares that the 'fraudulent nature' of Spring's job 'largely involves telling everybody who has ever had the slightest twinge of doubt about Covid vaccines or lockdowns that they're wrong and probably mad' and goes on to attack what he claims is 'the wholly bogus Manichean division between "real news" and "false news"'. Given the widespread prevalence of such pieces it is surely hardly surprising that Spring is the victim of truly epic trolling. For example, the *Sunday Times* (6 August 2023) quoted a tiny sample of the more repeatable insults aimed at her, such as 'filthy dirty propagandist', 'liar', 'communist bitch', 'leftist disgusting ugly dog' and 'you're a mindless slug of greed that I hope publicly gets thrown under a moving bus. Literally or figuratively'. Such comments certainly express feelings of 'alienation', but given that the global war on truth by certain politicians and sections of the media is actively worsening trust in journalism and institutions, its foot-soldiers in the British media should not be indulged or kowtowed to in any way – however 'alienating' they might find this.

#### **4. How well is regulatory oversight working? Are any changes needed, for example:**

##### **4a. In the way Ofcom oversees due impartiality and the extent of its remit?**

52. The statutory impartiality duties that Ofcom is obliged to enforce are contained in sections 319 and 320 of the Communications Act 2003. S319 requires that 'news included in television and radio services is presented with due impartiality', while S320 lays down 'special impartiality requirements' for programmes dealing with 'matters of political or industrial controversy' and 'matters relating to current public policy'. Two crucial points should be emphasised here: first, nowhere does the statute refer specifically to 'news programmes'; and second, these requirements include the exclusion of 'all expressions of the views or opinions of the person providing the service' (in this context, 'person' refers simply to the Ofcom licensee).

53. Calls to relax the impartiality regulations and to permit partisan news channels have long come from the partisan press, and from Murdoch-owned papers in particular. In 2007 Ofcom itself produced the report *New News, Future News*,<sup>44</sup> which asked whether, in a digital multi-channel environment, non-PSB channels should 'be allowed to offer partial news in the same way that newspapers and some websites do at present'. Those ideas received a hostile reception (although not in the Murdoch-owned newspapers) and were abandoned, although for a time Ofcom did licence Fox News for re-broadcasting in the UK.

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<sup>43</sup> See [YouTube clip of Dolan's programme](#).

<sup>44</sup> Ofcom (2007) *New News, Future News: The Challenge for Television News after Digital Switchover*. London: Ofcom.

54. Now, however, Ofcom’s approach to GB News and TalkTV suggests that, without any form of public consultation, it has covertly re-introduced the ideas from *New News*, *Future News*. It has done this through an over-flexible interpretation of the ‘due impartiality’ qualification by the 2003 Act. Its approach – and, in particular, its interpretation of the word ‘due’ – is expanded upon in section 5 of its Code and in the accompanying Guidance. The Code explains that ‘due’ means “adequate or appropriate to the subject and nature of the programme”. This does not mean, it emphasises, that every argument has to be represented and given an equal amount of time. Furthermore, ‘the approach to due impartiality may vary according to the nature of the subject, the type of programme and channel, the likely expectation of the audience as to content, and the extent to which the content and approach is signalled to the audience’. Importantly, Ofcom’s Guidance also states that ‘just because material is broadcast on a “rolling news” channel does not necessarily mean that the material would be characterised as “news” content’.
55. However, there appears to be confusion here between Ofcom’s Guidance and its Code, which the regulator has been exploiting in its opaque decision-making around these two overtly partisan channels. The Code does not differentiate ‘news content material’ from other content, but specifically states that in ‘matters of political or industrial controversy and matters relating to current public policy’ there are ‘special impartiality requirements’ and these apply to ‘news and *other programmes*’ (emphasis added). This is particularly important, as controversial subjects are GB News’s stock-in-trade, especially during their opinion-driven evening programmes. Moreover, those evening programmes are also highly personality-driven – precisely the model followed by Fox News – and thus could be regarded as falling into the category of what Ofcom calls ‘authored programmes’: for example, those fronted by Nigel Farage and Jacob Rees-Mogg.
56. In these cases, the Code states that presenters may express their own views on controversial matters but that ‘alternative viewpoints must be adequately represented either in the programme, or in a series of programmes taken as a whole. Additionally, presenters must not use the advantage of regular appearances to promote their views in a way that compromises the requirement for due impartiality’. Ofcom’s *Guidance* adds that alternative views ‘must not be included in a way that they are merely dismissed by the presenter and used as a further opportunity to put forward the presenter’s own views’. However, this is precisely what happens on such programmes almost as a matter of routine. This is in spite of the fact that when Ofcom’s CEO, Dame Melanie Dawes, gave oral evidence in March 2023 to the House of Commons Digital, Culture, Media and Sport select committee, she stated that “even a programme presented by somebody with a very strong set of political views needs to make sure that other voices are heard, or they will come up against our guidelines”.<sup>45</sup>
57. Ofcom has upheld a number of complaints against GB News, and two of its most complained-about presenters – Dan Wootton and Laurence Fox – have departed the station. However, the number of complaints upheld is tiny compared to the number of those received and considered (although Ofcom’s highly opaque procedures make it hard to ascertain the exact numbers of the latter). Additionally, not all the upheld complaints concerned impartiality, and the departures were not directly due to any intervention by Ofcom or in response to it upholding Code breaches against the channel.

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<sup>45</sup> [Oral evidence 14 March 2023, Q87. HC1204](#)

58. The simple fact here is that the whole *modus operandi* of GB News and TalkTV is incompatible with the Ofcom Code as it stands and, more importantly, as it used to be interpreted and applied.<sup>46</sup> The Committee asks whether any changes are needed in the way that regulatory oversight is working, but a far more pertinent question is: why, and on what authority, were the changes made to how the impartiality clauses of the Code are now interpreted and applied, so as to allow GB News and Talk TV to broadcast, largely with impunity, in the way that they do?
59. Part of the answer to this question appears to be provided by another remark by Dame Melanie to the DCMS Select Committee to the effect that “the phrase ‘freedom of expression’ is a very important part of this debate – one that perhaps should be a little bit more prominent”.<sup>47</sup> Similarly, its chairman Lord Grade has stated that “at the heart of Ofcom is the promotion of free speech and freedom of expression ... we are not in the business of stifling innovation”.<sup>48</sup> However, the simplistic conception of ‘freedom of speech’ that is being invoked here is akin to the kind of crude ‘free speech fundamentalism’ espoused by the likes of X/Twitter owner Elon Musk. In a UK context it also plays a key role in the culture wars waged by the Right, not least against the BBC and in favour of the relaxation of rules governing any speech on any platform – regardless of its provenance and the damage it might inflict on others, or on public and democratic life in general.
60. In defence of her notion of freedom of expression, Dame Melanie told the DCMS Select Committee that “we do not want to see just a single, monocultural, a mono-representation of views on British TV”,<sup>49</sup> and, in context, this can really only be read as referring, albeit obliquely, to the BBC which is regulated by Ofcom. Thus to concerns that GB News and TalkTV are inadequately regulated by Ofcom must be added the fear that it might regulate BBC content on the assumption that it has a ‘liberal bias’ that needs to be corrected. This is what the Culture Secretary, Lucy Frazer, appears to believe, even though she has been strikingly unable to produce any evidence for such a belief. Both of these matters should be of very considerable concern to the Committee in its deliberations on impartiality.

#### **4b. In the way Ofcom oversees media plurality?**

61. Ofcom’s light-touch approach to monitoring media plurality has been ineffective in securing a diverse news landscape, and the regulator lacks the necessary powers to prevent or remedy the increasing consolidation and concentration of news media outlets. Part of the problem lies in the absence of regular reviews of the UK media landscape in order to properly account for the extent of media plurality changes across TV, radio, newspapers and online platforms at the local, regional and national level. Without the duty to conduct regular reviews, Ofcom’s oversight of media plurality is limited to ad hoc reviews or ex-ante public interest reviews of media mergers.
62. The current regulatory environment for media plurality needs to be further enhanced to account for the significant role that large technology platforms and online intermediaries play in the production, distribution, curation and funding of news. New assessment criteria are needed to account for the ways

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<sup>46</sup> Barnett and Petley, ‘Come off it, Ofcom’, *British Journalism Review* 34(2).

<sup>47</sup> [Oral evidence 14 March 2023, Q39. HC1204](#)

<sup>48</sup> [BBC Media Show interview Lord Grade](#) at the VLV Annual Conference, 29 November 2023.

<sup>49</sup> [Oral evidence 14 March 2023, Q111. HC1204](#)

in which these platforms can amplify the reach and market share of dominant ‘traditional’ news outlets in the online environment, and thus worsen the concentration in cross-media ownership – even where these outlets appear to have a smaller or diminished presence in their traditional markets. For example, the daily print circulation of the Sun newspaper fell from an average of 1.56 million in 2017 to approximately 1.05 million in 2023, a fall of 32% over 6 years.<sup>50</sup> However, audience data from Pamco indicates that the Sun has a daily combined print and online readership of 8.7 million, suggesting that the Sun’s online audience (aided by its substantial reach on social media, favoured listing on search results and curation on news aggregators) is seven times larger than its average print circulation.<sup>51</sup>

63. Parliament should also examine the opportunities for introducing clear legislative thresholds for triggering interventions on media plurality across both news and online intermediaries involved in the distribution of news. This should be paired with explicit guidance on the kinds of remedies that can be imposed if a single media owner or platform breaches those thresholds. Such remedies might include forced divestment of media assets or the imposition of public obligations, such as investment in new funding sources for public interest journalism or requirements on platforms to boost the discovery of public service news (as with the prominence framework for public service broadcasting). As Ofcom suggested in its review of media plurality and online news,<sup>52</sup> additional regulatory tools and behavioural changes – including increasing platforms’ transparency about how they deliver, curate and prioritise news, and enhancing online users’ control over service features like content recommendations and data use – would also drastically improve the amount of information available to regulators to monitor and assess the impact of changes in media plurality on the health of the news environment.
64. Ultimately, however, reversing the current levels of extreme media concentration and remedying the intrinsic harms created by large technology platforms will not be achievable unless and until the underlying problems in news supply are addressed. Without targeted support and new forms of funding for independent (and particularly local) public interest journalism, as well as effective regular plurality reviews and controls across the news production ecosystem, general measures aimed at curbing the influence of online intermediaries will do little to improve diversity, enhance trust in news or support the public’s right to be informed.

## **5. Are there any actions the Government should take to address concerns around due impartiality, trust, and the influence of technology platforms?**

65. A vibrant, independent and impartial media is a vital means of supporting British democracy. It is essential that our media is able to scrutinise the actions of the powerful and operate without fear or favour. We believe that measures should be introduced to strengthen the media’s independence – such as removing the Government’s ability to directly appoint the Chair of the BBC or Channel 4 and replacing it with an independent and transparent appointments process. Ofcom should also, as we have already argued, take a more robust approach to preserving the existing impartiality rules within broadcasting. This is particularly necessary in light of the changing media landscape and in particular

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<sup>50</sup> MRC analysis of historical ABC figures, including MRC projections of estimated Sun circulation based on multi-year industry trends.

<sup>51</sup> Press Gazette, [‘Who reads The Sun?’](#), 5 July 2023.

<sup>52</sup> Ofcom [Media plurality and online news: Discussion document](#), pgs. 47-52.



the emergence of television ‘news’ channels such as TalkTV and GB News, which regularly feature elected MPs as presenters.

66. While Ofcom has taken some minimal steps in this area, conducting research into viewers expectations and upholding some specific programming complaints, their ‘case by case’ approach fails to address the consistent and cumulative way in which these channels undermine standards of impartiality. Ofcom should therefore conduct a review of these news channels approach to impartiality across their schedules. There is also a lack of clarity as to which kinds of programmes the ‘due impartiality’ rules relate to, given shifting boundaries between ‘news’ and ‘current affairs’ programmes. We recommend that policymakers provide urgent clarity on this matter to resolve confusion and provide a more consistent approach to upholding crucial standards of impartiality.

### **5a. Are changes needed to the Media Bill?**

67. After years of delays, distractions and Government attacks on the BBC and Channel 4, the Government has rushed the Media Bill through parliament without anything resembling meaningful public consultation, evidence-based impact assessments, or deliberation between parliament and civil society. The Minister for Media’s complete refusal to open Commons Bill Committee hearings to external evidence and expert testimony is only the latest of the Government’s attempts to pass these reforms without proper scrutiny.<sup>53</sup> Given the vital importance of public service broadcasting for British cultural expression, social cohesion and democratic processes, the deliberate exclusion of the public from these debates should not be glossed over on the spurious basis of ‘parliamentary expediency’.

68. The Media Bill could have been an opportunity to radically reform and upgrade public service media to create new support mechanisms for trusted independent journalism and to tackle many of the pressing concerns raised by the Committee’s current inquiry. Yet despite being the first major piece of broadcasting legislation since 2003, the Bill does not address any of the deeper challenges and opportunities for reforming Britain’s media in the 21<sup>st</sup> Century, and instead achieves little more than tinkering at the edges of existing policy. Alongside its damaging deregulations and narrowing of the principles of public service media, the Media Bill offers nothing that would improve trust in news, fix Ofcom’s failing and ineffective regulation of impartiality, or break up the damaging concentrations of Big Tech power.

69. There are nonetheless ways to use the Media Bill to tackle pressing policy challenges around impartiality and trust in the news environment. Chief amongst these is reforming Ofcom’s failed implementation and regulation of the Broadcasting Standards Code. As we have noted throughout this submission, Ofcom’s recent handling of successive complaints against GB News and TalkTV, together with its questionable approach to monitoring balance and equity in broadcast news over a much longer period, has shown it is demonstrably incapable of protecting the public interest in relation to impartiality, accuracy and discrimination on UK TV news channels.<sup>54</sup> Equally the limited legislative definition of ‘news’ under the 2003 Communications Act has allowed Ofcom to ignore clearly politicised and unbalanced news coverage or misleading and inaccurate discussions on political topics – often

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<sup>53</sup> See [PBC \(Bill 8\) 2023 – 2024](#), pg. 5. See also MRC [Policy Briefing on the DCMS White Paper](#), May 2022.

<sup>54</sup> Barnett and Petley, [‘Why Ofcom must find its backbone’](#), British Journalism Review 32(1); Barnett and Petley, [‘Come off it, Ofcom’](#), British Journalism Review 34(2).

presented exclusively by sitting MPs and serving Government ministers – on the basis that these programmes constitute ‘current affairs’ content rather than news.<sup>55</sup>

70. The Media Bill should reform Ofcom’s legislative duties for securing broadcasting standards detailed under Section 319 of the 2003 Communications Act. It should define the kinds of news output that are regulated for due impartiality, accuracy and misleading or harmful content – including on live TV and on-demand platforms – rather than leaving these judgements to Ofcom’s discretion. The Bill should also require that Ofcom establish a binding framework for how it will respond to and seek to remedy breaches of the Standards Code by a licenced broadcaster. This framework would provide greater certainty and accountability in Ofcom’s regulatory processes, and clearly outline the criteria justifying formal interventions – from censure, to fines, and ultimately to revocation of the licence – that Ofcom will make in case of sustained violations.
71. The Media Bill should also reform the governance and regulation of public service broadcasting in a way that opens its core institutions and processes to direct democratic control. Efforts at combatting distrust in news and public institutions will achieve little if the public itself remains excluded from the core decisions that shape how our media works and what its aims are. Far too often major changes in broadcasting legislation, PSBs’ content requirements and public funding allocations are implemented without meaningful public consultation, either in relation to audiences directly affected or in relation to broader social and cultural concerns. Instead, the public is treated as merely one stakeholder among many, with its needs and interests traded off against the commercial sensitivities of the wider broadcasting sector. Democratising public media requires far deeper structural changes to public service broadcasting than are likely to be achieved in the Media Bill, however there are a number of specific measures that would aid in this process: removing the discretionary powers of the Secretary of State over funding, quotas, regulatory frameworks and public media appointments; creating new mechanisms for direct public participation in programming making, public funding allocations and editorial oversight of PSBs’ output; and creating a legislative expectation on the Government to conduct reviews into the future democratisation of public media, particularly in advance of the forthcoming BBC Charter Review in 2027.

#### **4b. Are changes needed to the way the Government addresses mis- and dis-information?**

72. We are concerned about the influence of technology platforms on the quality of our information environment and, in particular, the rising tide of misinformation and disinformation. These concerns are only heightened by the rapid emergence of generative AI technologies, which risk a scale of misinformation never previously witnessed. Government policy to date has failed to provide adequate protections to protect democracies against this problem. The Online Safety Act lacks sufficient emphasis on the issue – the only reference to misinformation in the legislation is regarding the setting up of an advisory committee for Ofcom. The Committee lacks any meaningful powers and is only tasked with providing a report on misinformation to Ofcom within 18 months of being established. Given it had not been established at the time of writing, and the rapid pace of technological change, particularly in a year where half the world’s population will be voting in an election, we are concerned

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<sup>55</sup> See Press Gazette, [‘TalkTV’s Nadine Dorries did not breach impartiality rules with Boris Johnson interview, Ofcom finds’](#), 5 April 2023; Guardian, [‘No rule to stop Tory MPs interviewing minister on GB News, says Ofcom boss’](#), 28 September 2023; The Times, [‘GB News presenter Neil Oliver cleared by Ofcom over ‘turbo cancer’ claims’](#), 6 February 2024.

that the advisory committee is a deeply insufficient response to the challenges presented by misinformation.

73. Some members of the Government have themselves noted that the Online Safety Act failed to make sufficient provisions in relation to misinformation – Jeremy Wright, who was Secretary of State for Digital, Culture, Media and Sport during the development of the Online Safety White Paper, has been quoted<sup>56</sup> as saying that his department

“was told that the Cabinet Office would be taking care of all of this. ‘Don’t you worry your pretty little heads about it, it’ll be done elsewhere in something called the Defending Democracy Agenda.’ And then I think, subsequently, it wasn’t really... There still is a gap there.”

74. Government therefore must be explicit as to the department and relevant agencies that have responsibility for the misinformation agenda. This should include strengthened responsibilities for Ofcom, who should take on a more proactive role on monitoring misinformation beyond the advisory committee and current programmes on media literacy. Other tools available to policy-makers to address misinformation include providing greater funding and support for fact checking organisations to develop tools and common standards, imposing responsibilities on platforms to flag, label and deprioritise misleading or factually inaccurate content, and algorithmic amplification of high-quality information and public interest content.

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<sup>56</sup> Quoted in Wired, [‘The UK’s controversial Online Safety Act is now law’](#), 26 October 2023.