



THE BBC COMPLAINTS SYSTEM UNDER OFCOM 2017-2025

An eight-year assessment of BBC complaints,
regulatory outcomes and transparency

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EXECUTIVE SUMMARY

This report examines the operation of the BBC complaints system during the current Charter period (2017–2025), focusing on the interaction between the BBC’s internal ‘BBC First’ process and statutory oversight by Ofcom.

Between 2017 and 2025, the BBC received **2,275,387 complaints**. Over the same period, **4,944 cases were considered by the Executive Complaints Unit** (the BBC’s final internal stage of review) — equivalent to roughly **one ECU case for every 460 complaints received**. Of those, **200 were upheld or partly upheld** under the BBC Editorial Guidelines. Ofcom, acting as the BBC’s independent statutory regulator, recorded **just three breaches** of the Broadcasting Code across the entire period.

Drawing on eight Ofcom Annual Reports, BBC publications and Executive Complaints Unit (ECU) decisions, this analysis reconstructs how more than 2.27 million complaints were received, filtered and resolved, and assesses how those outcomes have been reported to Parliament and licence fee payers, a narrowing dynamic described below as the ‘funnelling effect.’ The analysis has involved painstaking work – conducted in the public interest – totalling more than 1,000 hours.

Principal findings:

- **The funnelling effect is structural, not incidental.** Millions of complaints enter the BBC First system, yet only nine Ofcom investigations have been opened across the Charter period. This narrowing is driven by design features: mandatory internal stages, strict submission and escalation deadlines, programme-specific requirements, and 1,000-word complaint limits. Progression depends on complainants navigating these constraints, which systematically exclude longitudinal or cross-programme analysis.
- **There is no end-to-end public dataset.** Neither the BBC nor Ofcom publishes a single, coherent account tracing complaints from initial submission through internal handling, ECU review, Ofcom assessment, investigation and breach. Any full picture must be reconstructed manually by reconciling multiple reports that use different definitions and reporting units.
- **Reporting methodology has been inconsistent and unstable.** Changes in terminology (‘complaints’, ‘cases’, ‘assessments’, ‘investigations’) and scope (e.g., limiting reporting to matters ‘within Ofcom’s remit’) have occurred without historical restatement, hindering or preventing reliable year-on-year comparison.

- **Transparency decreases as volume increases.** Detailed reasoning in complaints adjudication is available only for the small minority of cases reaching the ECU or formal Ofcom investigation. The overwhelming majority of complaints conclude at earlier stages with no published explanation, leaving most of the decision-making opaque.
- **Due impartiality: high volumes, zero breaches.** Impartiality issues have consistently generated the highest volume of complaints. Research by Cardiff University's School of Journalism, Media and Culture found that between January and August 2025, 72.9% of all complaints to the BBC concerned impartiality. Yet of the 178 complaints the ECU has upheld or partially upheld over the eight-year Charter period, only 38 related to due impartiality – just 21%. Moreover, Ofcom has not upheld a single Broadcasting Code breach for due impartiality since taking on its regulatory responsibility. Where the BBC ECU has upheld impartiality complaints, remedies are invariably internal (clarification, guidance) with no external sanction.
- **Audience trust in BBC impartiality is in measurable decline.** The complaint data is consistent with independent survey evidence. Government-commissioned research by Ipsos UK (DCMS, 2025) found that BBC News performed less well on providing unbiased coverage than on any other measured attribute tested. Find Out Now tracker surveys conducted throughout 2025 found that an outright majority of GB adults — 52% against 28% — said they do not trust the BBC to be impartial. The structural features of the complaints system documented in this report may themselves be contributing to that erosion of confidence.
- **Ofcom relies on BBC-supplied data.** The regulator's oversight depends substantially on BBC data and internal categorisation. Internal BBC determinations are rarely displaced by independent regulatory findings.
- **The central weakness: an un-auditable system.** The fundamental problem is not the low number of upheld findings, but the absence of a stable, consolidated and auditable account of how complaints move through the system from entry to resolution. This prevents meaningful external scrutiny and undermines public confidence. According to Ofcom's own research, only 18% of complainants are satisfied by the process.

1. INTRODUCTION

Since the start of the current BBC Charter period in 2017, the Corporation has operated under the ‘BBC First’ model for handling audience complaints. Complaints about BBC content are handled initially by the BBC itself. Ofcom acts as statutory regulator only once the BBC’s internal process is complete; it does not adjudicate in parallel. This places the BBC in the position of both the initial decision-maker and the gatekeeper to independent regulatory review.¹ It is its own judge and jury.

Across the eight reporting years to date, the BBC has received more than 2.27 million complaints.² Volumes have fluctuated – rising during the Covid-19 pandemic, major political events and international conflicts – but have remained consistently high throughout the Charter period. By contrast, only a very small proportion of these complaints have resulted in formal enforcement action.

Over the same period, Ofcom has undertaken only nine investigations into BBC content and has recorded just three breach findings under the Broadcasting Code.³ The incongruence between total complaints and formal regulatory outcomes is striking.

Headline totals alone cannot explain this disparity. Before a complaint can reach Ofcom, it must pass through a series of defined escalation thresholds and internal review stages within the BBC.⁴ Many complaints conclude – or are abandoned – at these stages. Only a small subset progresses to the Executive Complaints Unit, and only a fraction of those are subsequently eligible for Ofcom consideration.⁵ Even then, only outcomes falling within specific reporting categories (ECU decisions, Ofcom assessments, investigations or breach findings) are published in a form that allows external scrutiny.⁶ As a result, a large

¹ Ofcom, *How Ofcom deals with BBC complaints – what you need to know* (2024) <https://www.ofcom.org.uk/tv-radio-and-on-demand/bbc/how-ofcom-deals-with-bbc-complaints-what-you-need-to-know>

² Ofcom, *Annual Reports on the BBC (2017–2024)* <https://www.ofcom.org.uk/tv-radio-and-on-demand/bbc/annual-report-on-the-bbc>

³ Ofcom, *Procedures for handling BBC content standards complaints, investigations and sanctions* (2017) <https://www.ofcom.org.uk/tv-radio-and-on-demand/information-for-industry/content-standards/bbc-procedures>

⁴ BBC, *BBC Complaints Framework* (2023) <https://www.bbc.co.uk/contact/how-we-handle-your-complaint>

⁵ Ofcom, *How Ofcom deals with BBC complaints – what you need to know* (2024) <https://www.ofcom.org.uk/tv-radio-and-on-demand/bbc/how-ofcom-deals-with-bbc-complaints-what-you-need-to-know>

⁶ Ofcom, *Broadcast and On Demand Bulletin* (2024), which publishes only selected outcomes such as investigations, breach findings and content standards decisions. <https://www.ofcom.org.uk/tv-radio-and-on-demand/broadcast-bulletins>

proportion of complaints are resolved within the BBC's own process without independent adjudication or public explanation.

This paper examines how this narrowing dynamic operates. It analyses the stages of BBC First, the criteria governing referral to Ofcom, and the reporting framework through which complaint outcomes are documented – particularly for issues of impartiality, which generate the highest volumes of audience concern. The central question is not simply how many complaints are upheld, but how the system's architecture funnels sustained public concern into a vanishingly small number of independently scrutinised cases – and whether that funnel is visible enough to command public confidence.

2. THE SCALE OF BBC COMPLAINTS

The table sets out the number of complaints received by the BBC each year and the smaller numbers that progressed to internal findings or formal regulatory outcomes.

The figures have been reconstructed by News-watch through cross-referencing the eight Ofcom *Annual Reports on the BBC (2017-25)*⁷, together with BBC *Annual Reports*⁸ and Executive Complaints Unit publications covering the Charter period.⁹ The table therefore brings together data that Ofcom reports separately, showing the movement of complaints through the system, year by year.

Table 1 – Yearly totals and outcomes

COMPLAINT STAGES	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	TOTAL
COMPLAINTS RECEIVED BY THE BBC	223,500	218,352	368,377	462,255	433,572	229,123	179,743	160,465	2,275,387
CASES DEALT WITH BY THE ECU AT STAGE 2	405	549	759	455	325	1199	594	658	4,944
ECU UPHOLDS AND PARTIAL UPHOLDS	26	37	31	18	14	21	13	40	200
BBC BREACHES OF EDITORIAL STANDARDS	41	54	55	40	41	43	35	40	349
COMPLAINTS ESCALATED FROM ECU TO OFCOM	150	153	179	120	81	117	114	157	1,079
OFCOM BROADCASTING CODE BREACH FINDINGS	1	1	0	0	1	0	0	0	3

Ofcom does not publish a single dataset tracing complaints from BBC First through to regulatory outcomes, nor does it reconcile its figures in a single consolidated account.

The way these data are reported makes them difficult to interpret. Across successive Annual Reports, Ofcom has used different units of reporting – ‘complaints’, ‘cases’, ‘investigations’ and ‘programmes’ – without consistently explaining how they relate to one another.¹⁰ From 2021/22 onwards, Ofcom limited its published figures to Executive Complaints Unit cases ‘within Ofcom’s remit’, excluding complaints about BBC Online, the

⁷ Ofcom, *Annual Report on the BBC (2017/18–2024/25)*, available at <https://www.ofcom.org.uk/tv-radio-and-on-demand/bbc/annual-report-on-the-bbc>

⁸ BBC, *Annual Reports and Accounts*, available at <https://www.bbc.co.uk/aboutthebbc/governance/reports>

⁹ BBC, *Executive Complaints Unit (ECU) publications*, available at <https://www.bbc.co.uk/aboutthebbc/complaints/ecu>

¹⁰ Ofcom, *Annual Report on the BBC* (multiple editions), which uses varying units including ‘complaints’, ‘cases’, ‘assessments’, ‘programmes’ and ‘investigations’ in reporting outcomes across different years. <https://www.ofcom.org.uk/tv-radio-and-on-demand/bbc/annual-report-on-the-bbc>

World Service and other content outside the Broadcasting Code. Earlier years were not restated on the same basis, which prevents consistent year-on-year comparison.¹¹

At the same time, BBC Editorial Standards breach figures reflect internal findings across all BBC output and against a broader set of standards than those enforced by Ofcom. BBC breach totals and Ofcom breach findings are therefore not directly comparable.

These reporting practices mean readers cannot clearly trace what happens to complaints once they enter the system. Licence fee payers, parliamentarians and other interested parties cannot follow figures consistently from year to year. Ofcom does not publish a reconciled set of data showing how matters move from BBC First through to regulatory outcome. For most complaints received at entry level, no detailed information is published beyond headline totals.¹²

The effect is that the system is most transparent where it handles the fewest complaints, and least transparent where it handles the most – limiting the public’s ability to assess the nature, seriousness and resolution of the majority of complaints submitted. Yet even with these limitations, the available data demonstrate a consistent pattern: high numbers of complaints at entry level and sharply smaller numbers at each subsequent stage of review.

The graphic below illustrates the reduction from initial complaint volumes to the tiny number of regulatory breaches recorded across the Charter period. While more than two million complaints were submitted to the BBC at Stage 1, only a minuscule proportion reached Ofcom; even fewer progressed to formal investigation; and just three resulted in breach findings.¹³

¹¹ Ofcom, Annual Report on the BBC 2021/22 https://www.ofcom.org.uk/_data/assets/pdf_file/0028/240028/annual-report-bbc-2021-22.pdf

¹² In 2023, News-watch identified inconsistencies in Ofcom's published figures, including instances where headline totals, narrative descriptions and underlying classifications did not correspond. When queried, Ofcom clarified that apparent discrepancies arose from distinctions between 'complaints' and 'cases' – a distinction assumed rather than explained in its published reports. This is outlined in Annex B.

¹³ Figures in the graphic and table exclude the *Gaza: How to Survive a War Zone* breach, as it was concluded after the end of the 2024/25 performance year. The case was nevertheless included in Ofcom’s eighth Annual Report on the BBC for completeness, and is examined separately in Annex A.

Graphic 1: BBC complaints and regulatory outcomes, 2017–2025 – The Funnel Effect



To understand how this narrowing occurs, it is necessary to examine the individual stages of the complaints process in detail.

3. THE COMPLAINTS ARCHITECTURE

The BBC First process operates through a sequence of defined stages. Each stage imposes formal requirements – submission deadlines, escalation windows and admissibility criteria – that determine whether a complaint progresses or concludes.

In broad terms, complaints can be limited, delayed, or rejected if they are late, trivial, abusive, anonymous, missing required details, too long, cover unrelated issues, introduce new points too late, bypass the central complaints system, duplicate legal or regulatory processes, fall outside the framework (such as HR matters), involve repeated or vexatious behaviour, or cannot be investigated because too much time has passed or the required records no longer exist.¹⁴

The only complaints that can bypass earlier BBC stages are first-party fairness and privacy complaints, complaints the BBC refuses to investigate (which can go straight to the ECU for a review of that refusal), and cases where the BBC misses its own deadlines or Ofcom intervenes exceptionally early, while all other complaint types must follow the full staged process in order.

Stage 1 – Audience Services

Stage 1 complaints are handled by Audience Services, a function long delivered under contract by an external supplier. In 2025, following a competitive tender process, the BBC awarded a new Audience Services contract to Serco, due to begin in April 2026.¹⁵

Complaints must normally be submitted within 30 working days of broadcast or publication and escalated within further defined deadlines. The online complaints gateway also imposes a 1,000-word limit. Complaints must relate to specific items of content and satisfy admissibility criteria set out in the BBC’s published procedure. These requirements limit the type of complaint that can realistically be advanced. Immediate, broadcast-specific grievances are accommodated; longer, evidential or aggregated submissions are constrained by time, format and scope. The framework only permits discrete, individual

¹⁴ https://www.bbc.co.uk/contact/sites/default/files/2025-04/complaints_framework_march_2025_eng.pdf

¹⁵ <https://www.serco.com/media/12682/serco-bbc-contract-win.pdf>

complaints (or those related to a linked series) rather than systemic or longitudinal concerns. While procedurally lawful, this design limits the ability of third-party organisations to aggregate complaints across multiple outputs or pursue sustained scrutiny of editorial patterns over time. They also preclude thematic reviews of the type that the BBC itself measures its performance and adherence to editorial standards.

Stage 1 is the point where most complaints conclude. Audience Services provides the initial response and determines whether a matter can proceed further. For complainants dissatisfied with that response, escalation must be requested within 20 working days. Escalation is not automatic. Unless the complainant acts within the prescribed timeframe, the matter is treated as closed.

No detailed information or reasoning is published for those complaints that conclude at Stage 1. Beyond aggregate totals, there is no publicly accessible dataset describing their subject matter, the basis of their resolution, or the extent to which similar complaints were grouped together. In practical terms, most complaints are counted but not visible.

The new Serco contract permits the use of Artificial Intelligence tools to assist with triage, categorisation and drafting responses. While it is said that final replies will remain subject to human oversight,¹⁶ Stage 1 is the gateway through which the majority of complaints pass and conclude. There is no published account of how these tools will operate in practice, what safeguards will apply to editorially complex submissions, or whether automated triage affects the likelihood of escalation. The introduction of AI is thus a matter of concern.

Complainant Confidence

Like so much else about the complaints domain, very little data is available about audience confidence in the BBC First process. Ofcom finally tackled the subject in 2022. An audience perception survey found that only 18% of complainants described having had a ‘good experience’.¹⁷ The figure attracted considerable media and parliamentary concern and Ofcom acknowledged ‘the low number of complaints being escalated to Ofcom may be a result of frustration as opposed to satisfaction with how the BBC has dealt with audience

¹⁶ <https://www.anjin.digital/blog-posts/bbc-serco-ai-complaints-automation>

¹⁷ <https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-2-6-weeks/222191-how-ofcom-regulates-the-bbc/associated-documents/3-bbc-first-complaints-research-report.pdf?v=328091> p.20

concerns.¹⁸ The 2022 survey also revealed a deeper problem lying upstream of the complaints process itself. Around two thirds of UK adults who had cause to complain about the BBC did not go on to make a complaint at all – with 42% feeling it would not make a difference and 29% feeling it would not be taken seriously.¹⁹

Alongside its audience perception survey, Ofcom conducted a structured ‘mystery shopping’ exercise in which researchers submitted test complaints to assess timeliness, clarity of responses and the effectiveness of escalation signposting within the BBC First system – an exercise focusing on the mechanics of the system rather than the nature of complaints or their outcomes. A similar exercise was undertaken in 2024, with a second ‘mystery shopping’ survey which followed 506 complaint journeys to test accessibility and response handling.²⁰ However, Ofcom did not repeat its audience perception survey of 2022 to investigate whether there had been any improvements satisfaction levels. As such, the only direct published measure of complainant confidence remains the 18% figure.

In a framework that relies on the persistence of individual complainants to trigger further review, the absence of updated perception data leaves a material evidential gap. Without refreshed satisfaction data, escalation statistics alone cannot demonstrate improved public confidence in the system.

Stage 1b – Editorial Reconsideration

Under BBC First rules, escalation to Stage 1b must normally be requested by complainants within 20 working days of the Stage 1 response. If that deadline is missed, the complaint is generally treated as closed unless the BBC exercises discretion to accept a late submission. Progression to this stage therefore depends on complainant action within a defined timeframe.

Where escalation is made in time, the complaint moves into the BBC’s editorial hierarchy. A senior editor or relevant content division executive reconsiders the programme against

¹⁸ <https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-2-6-weeks/222191-how-ofcom-regulates-the-bbc/associated-documents/how-ofcom-regulates-the-bbc.pdf> p.3

¹⁹ Ofcom (2022) BBC Periodic Review: Quantitative Research on Audience Perceptions of the BBC First Complaints System. London: Ofcom. Fieldwork conducted 19 November 2021 – 7 January 2022 (528 telephone and 1,879 online interviews). Summary available at: <https://www.ofcom.org.uk/news-centre/2022/bbc-must-transform-the-way-it-serves-audiences>.

²⁰ <https://www.ofcom.org.uk/siteassets/resources/documents/tv-radio-and-on-demand/bbc/bbc-annual-report/2024/a-mystery-shopping-exercise-of-the-bbc-first-complaints-process.pdf>

the BBC Editorial Guidelines and issues a further response. This stage is typically more detailed than the 1a reply, but it remains internal. The BBC again measures its own performance.

Complaints may be declined at this stage if considered repetitive, out of scope, abusive or out of time. In this domain also, the BBC does not publish data showing how many complainants seek Stage 1b escalation, how many requests are rejected (or on what terms), or how many complaints conclude following editorial reconsideration without referral to the Executive Complaints Unit. While the BBC ECU includes some high-volume complaints in its fortnightly bulletin, there is no publicly available dataset tracing complaints through each intermediate stage of the process. Only the few that proceed to the ECU are described in any substantive detail.

Beyond the absence of stage-by-stage data, the reasoning applied at Stage 1b is itself not publicly visible in any systematic way. Responses are issued privately to individual complainants and are not routinely published or indexed. To the outside world, it is therefore not possible to assess how editorial standards are interpreted at this level, how comparable complaints are treated across different programmes, or how often reconsideration results in substantive change. A significant layer of editorial judgement thus takes place without external scrutiny of how decisions are reached or whether similar issues are approached in a coherent and even-handed way.

More broadly, the structure of Stage 1b places the BBC in the position of reassessing its own output in response to external criticism, applying its own standards to its own work without independent visibility of the reasoning. Even where undertaken in good faith, such an arrangement is inherently reactive – focused on defending or clarifying an editorial decision already made, rather than conducting an objective, arm's-length review. The design therefore tilts the process towards institutional self-justification as opposed to detached evaluation. It may well be the reason that only 18% of the 2022 Ofcom survey respondents were satisfied, but there is no way of establishing the picture.

Stage 2 – The Executive Complaints Unit

The Executive Complaints Unit represents the final BBC stage of the BBC First process. Referral requires a complainant to escalate their concerns, normally within 20 working days

of the Stage 1b response. The ECU reviews the original complaint, prior correspondence and the relevant provisions of the BBC Editorial Guidelines before issuing a formal outcome. Unlike earlier stages, there is no fixed statutory timeframe within which the ECU must conclude its review.

At this stage the BBC deploys a battery of highly experienced, dedicated complaints staff including lawyers and senior editors and news executives. Most complainants, in sharp contrast, have to rely on their own limited resources. It is a David and Goliath engagement.

Summaries of ECU outcomes are published in two principal formats. The Fortnightly Complaints Reports required under Ofcom's regulatory framework lists Stage 2 findings in tabular form, identifying the programme, date of transmission, issue and outcome in a compressed format. These entries provide minimal contextual explanation and function primarily as a reporting instrument rather than as detailed accounts of the Unit's reasoning. In some instances the bulletin includes hyperlinks to fuller judgements on the ECU section of the BBC website.

The website archive presents structured summaries under 'Complaint' and 'Outcome' headings. The level of detail varies markedly. The majority of entries describe the complaint and the Unit's reasoning in concise form within a standardised template. In a small number of cases, longer judgements are published, engaging at length with evidence, editorial decision-making and subsequent clarification. There is no published framework indicating why some cases receive extended treatment while others are summarised briefly. The variability in depth makes systematic comparison difficult and severely limits the ability of external observers to assess patterns in reasoning or approach across cases.

Neither format reconciles the total number of complaints received with the number progressing through Stage 1b, accepted for full ECU review, or resulting in a final decision.²¹ Nor does the BBC publish consolidated annual statistics setting out overall Stage 2

²¹ ECU decisions are recorded as 'upheld', 'partly upheld', 'not upheld' or, in some cases, 'resolved', reflecting the Unit's assessment of compliance with the BBC Editorial Guidelines. An upheld or partly upheld decision results in a published finding and may require corrective action. A not upheld decision concludes that no breach occurred, while a resolved outcome indicates that the matter was addressed during review without a formal breach determination.

volumes or outcome rates across the Charter period. There is therefore no publicly available dataset tracing complaints through each stage of the internal process.

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Each summary is drafted by the ECU itself. The complainant’s original submission is not published, and there is no requirement to reproduce the arguments raised in full or to confirm that each has been addressed individually. The Unit identifies the issues it considers determinative of compliance with the BBC Editorial Guidelines, but it is not always possible, from the published material alone, to ascertain whether all points advanced by the complainant have been substantively considered or whether some have been treated as subsidiary to the ECU’s framing of the central issue.

A review by News-watch of approximately 1,000 published ECU decisions available on the BBC website indicates that where complaints are upheld or partly upheld, the remedial action typically consists of clarification, correction or internal editorial guidance, often recorded as discussion with programme makers or circulation of the decision within relevant teams. The ECU does not impose penalties or external sanctions; its remedies are corrective and advisory in nature. Most amount to an internal BBC discussion between the ECU staff and the relevant programme.

Institutionally, the ECU sits within the BBC’s corporate structure and operates under the authority of senior management, ultimately reporting within a framework overseen by the Director General. In October 2023, following concerns raised in the government’s BBC Mid-Term Review, oversight of the ECU was moved directly to the Director-General. The review had found that the ECU was previously overseen by the director of editorial policy – the same executive responsible for ensuring programmes comply with BBC rules. Ministers

expressed concern that this created a conflict of interest, leading to executives ‘marking their own homework’ and potentially creating a disincentive to uphold complaints.²²

While this new arrangement may have been intended to ensure organisational accountability, it means that final internal adjudication is not structurally separated from the executive leadership responsible for the BBC’s editorial strategy and reputation. The Unit therefore conducts its review from within the standpoint of the organisation whose output is under scrutiny.

In procedural terms, the ECU represents the final stage of the BBC First process. There is no appeal. Only once an ECU outcome has been issued may a complainant refer the matter to Ofcom for independent regulatory consideration.

Referral to Ofcom

A complaint may be referred to Ofcom only after the BBC First process has been exhausted and normally within 20 working days of the BBC’s final response. Where deadlines at any stage have been missed, Ofcom will generally decline to consider the complaint unless there are exceptional circumstances. Access to independent regulatory review is therefore conditional upon strict compliance with procedural requirements as well as exhaustion of the BBC’s internal process. This is a process which normally takes many months – and sometimes more than a year - and so progression to Ofcom takes great perseverance on behalf of the complainant.

Upon receipt, Ofcom applies its statutory remit and eligibility criteria. Complaints may fall outside its regulatory scope; concern matters not governed by the Ofcom Broadcasting Code; duplicate issues already addressed; or be assessed as insufficiently serious or not proportionate to warrant further regulatory action. Where a complaint is accepted for consideration, it enters an initial assessment stage. Assessment does not constitute adjudication and does not result in a finding of breach; it determines only whether the issues raised justify formal investigation under the Code.

²² Malnick, E. (2023) 'BBC to overhaul complaints system after ministers accuse executives of "marking their own homework"', *The Telegraph*, 5 October. Available at: <https://www.telegraph.co.uk/news/2023/10/28/bbc-tim-davie-israel-amas-bashir-princess-diana/> See also: Government summary of the BBC Mid-Term Review 2024, which notes the new legally binding responsibility for the BBC Board to actively oversee the complaints process.

Ofcom does not publish detailed reasoning at the assessment stage for complaints that do not proceed to formal investigation. Where a complaint is screened out as outside remit, insufficiently serious, or not proportionate to pursue, no substantive public adjudication is issued. Nor does the regulator routinely publish analysis of the reasoning applied at Stage 1 or by the Executive Complaints Unit unless the matter progresses to formal investigation. In practice, the basis on which most complaints are filtered out is visible only in aggregate statistics rather than in reasoned decisions.

Across the Charter period, approximately 1,400 complaints completed the BBC First process and were eligible for Ofcom consideration. Of those, only 10 were taken forward to formal investigation, and just three resulted in findings of breach. Only complaints proceeding to investigation can lead to an upheld finding or sanction. Independent regulatory adjudication has therefore occurred in 10 cases out of approximately 1,400 eligible referrals across the period.

The regulator's approach to scope and proportionality is illustrated by its 2017 assessment of a complaint from Gavin Hunt about guest selection on BBC One's *Question Time*. The complainant submitted a detailed analysis of 25 editions from that year's season (thus arguably a linked series). His complaint alleged bias towards panellists supporting remaining in the EU.²³ In its adjudication, Ofcom stated it did 'not consider it would be proportionate to assess all 25 programmes' and instead reviewed the two editions the complainant had identified as having the most unbalanced panels. One of these was deemed irrelevant as it contained no discussion of the EU referendum.²⁴ The substantive assessment therefore rested on a single programme. In rejecting the complaint, Ofcom emphasised that 'due impartiality' does not require an equal division of time and that a range of editorial techniques, including the presenter's role and challenges from the audience, can preserve balance.²⁵ The case demonstrates the regulator's huge discretion both in defining the scope of its review and in interpreting how the due impartiality rules are applied in practice.

²³ Ofcom, *Letter to Mr Gavin Hunt regarding BBC1, Question Time, Season 15*, Ref: 00483581, 7 December 2017, p. 1. Available at: <https://news-watch.co.uk/wp-content/uploads/2017/12/2017.12.07-ofcom-reply.pdf>

²⁴ *Ibid.*, p.2

²⁵ *Ibid.*, p.3

Ofcom's engagement with the BBC complaints system is therefore primarily reactive rather than supervisory. The regulator does not routinely review or audit Stage 1 or Executive Complaints Unit decisions in the absence of referral, nor does it publish thematic analysis of patterns emerging from those stages. Its involvement is triggered by individual escalation and confined to the issues raised in that referral. While this approach reflects the limits of Ofcom's statutory role, it also means that the regulator does not systematically examine how the earlier stages of the BBC First process are operating in practice unless prompted to do so by a complainant.

In structural terms, Ofcom's function is not to re-adjudicate every complaint that completes the BBC First process, nor to undertake comprehensive review of the full evidential record assembled at earlier stages. Its role is to apply regulatory thresholds of seriousness and proportionality. Where those thresholds are not met, complaints generate no independent public reasoning beyond the fact of non-investigation. The regulatory model is therefore one of conditional intervention rather than continuous scrutiny, with formal adjudication reserved for a very small subset of cases.

4. DUE IMPARTIALITY

Due impartiality is, by a significant margin, the single largest category of concern among BBC audiences. Analysis by Cardiff University of complaints received by the BBC between January and August 2025 found that **impartiality accounted for 72.9% of all complaints** – compared to fairness (4.6%), gender discrimination/offence (4.4%) and accuracy (4.4%).²⁶ This finding – that nearly three-quarters of all complaints concern impartiality – confirms that **impartiality is the central fault line in the BBC’s relationship with its audiences**. No other issue comes close.

The complaints data does not stand alone. Independent audience research confirms a broader and deepening crisis of trust in BBC impartiality. Government-commissioned research by Ipsos UK, published by DCMS in December 2025, found that BBC News performed less well on providing unbiased news coverage than on any other measured attribute, with 30% of respondents saying it did not perform well on this.²⁷ Find Out Now tracker surveys running throughout 2025 found that an outright majority of GB adults – 52% against 28% – said they do not trust the BBC to be impartial, a figure that had remained essentially unchanged from the start of the year.²⁸ YouGov polling conducted in November 2025 following the resignations of Director General Tim Davie and CEO of News Deborah Turness found that half of the British public believe the BBC is biased, with only 19% saying it is not biased at all.²⁹

Despite this huge audience concern, in practice very few impartiality complaints proceeded to independent regulatory adjudication under the Broadcasting Code. Many were referred back to the BBC for failure to complete BBC First, did not progress beyond

²⁶ Smith, M. and Jones, P. (2025) *Complaints and the BBC: An Analysis of Audience Concerns January–August 2025*. Cardiff: Cardiff University School of Journalism, Media and Culture. The study analysed 9,602 complaints received by the BBC across all services during the period.

²⁷ Department for Culture, Media and Sport (2025) *Value of BBC News*. London: DCMS. Research conducted by Ipsos UK; fieldwork 18 February – 20 March 2025. Available at: <https://www.gov.uk/government/publications/value-of-bbc-news/value-of-bbc-news>

²⁸ Surmon, T. (2025) 'BBC polling', *Find Out Now*, 13 November. Available at: <https://findoutnow.co.uk/blog/bbc-polling/> (Accessed: 2 March 2026). Survey of 2,001 GB adults conducted 10 November 2025; monthly tracker surveys conducted since January 2025.

²⁹ Smith, M. (2025) 'Is the BBC biased? What the public think following the Davie and Turness resignations', *YouGov*, 10 November. Available at: <https://yougov.com/en-gb/articles/53363-is-the-bbc-biased-what-the-public-think-following-the-davie-and-turness-resignation>

Ofcom's assessment stage, or were concluded internally by the BBC, including at Executive Complaints Unit level.

This filtration of impartiality complaints begins early and is nearly total. The same 2025 Cardiff analysis found that 98.8% of impartiality complaints were resolved at the BBC's initial Stage 1 – meaning fewer than 1.2% proceeded to escalation, internal review, or potential referral to Ofcom. By comparison, only 83.4% of accuracy complaints were resolved at this stage, suggesting the subject matter of impartiality complaints may itself influence discontinuation rates.³⁰ Complainants raising impartiality concerns may be more likely to disengage when met with procedural barriers or responses they consider unsatisfactory.

Across the eight-year Charter period, the ECU upheld or partly upheld **38 complaints relating to due impartiality**, out of 178 upheld or partly upheld complaints overall – approximately one in five. However, this understates the true scale of impartiality concerns. It excludes cases where due impartiality formed part of the original complaint but was not designated as the primary issue by the ECU, as well as rulings where impartiality was substantively engaged in the response but not recorded as a discrete 'impartiality case'. News-watch analysis of all upheld or partly upheld cases³¹ indicates that those in which due impartiality was a material factor may number closer to double the BBC's reported figure, pointing to a **systematic narrowing effect in classification and reporting practices**. Ofcom, in turn, reproduces these figures without interrogation or adjustment.

³⁰ Ibid. The study found significant variation in initial-stage resolution rates by complaint category: impartiality (98.8%), bias (99.5%), accuracy (83.4%). The authors note that "the subject matter of complaints appears to influence whether complainants pursue escalation, with those raising subjective editorial judgements (impartiality, bias) far less likely to proceed than those raising factual inaccuracies."

³¹ <https://news-watch.co.uk/wp-content/uploads/2023/06/News-watch-Survey-of-BBC-ECU-rulings-120423.pdf>

Graphic 2 – What Ofcom actually upholds



Since assuming its regulatory duties in 2017, **Ofcom has not upheld a single Broadcasting Code breach for due impartiality.** Between 2021 and 2025, Ofcom recorded just ten confirmed breaches of impartiality across all UK broadcasters. GB News accounted for five, the BBC three, and Times Radio and ITV the remainder.³² The regulator has therefore consistently concluded that the BBC remained compliant with its statutory impartiality obligations, irrespective of the volume and persistence of audience complaints raising such concerns.

Where the ECU upheld or partly upheld complaints engaging impartiality, remedial action typically consisted of clarification, correction or internal editorial guidance – discussion with programme makers or circulation of guidance, without financial penalty or regulatory escalation.

The result is a system in which due impartiality generates sustained complaint activity – **72.9% of all complaints** – but where **98.8% are resolved at the initial stage**, the ECU has upheld only **38 cases across eight years**, and **Ofcom has recorded zero breach findings.** Whether this reflects the difficulty of adjudicating impartiality, the robustness of BBC editorial compliance, or the structure of the complaints process itself, the pattern is consistent. That consistency is itself a defining feature of the current regulatory framework.

³² Ibid., drawing on Ofcom broadcast and on-demand bulletin data 2021-2025.

Transparency, public confidence and diminishing returns

Low escalation rates are not evidence of satisfaction. Ofcom itself has cautioned against reading them as such, pointing to factors including delay, poor responses and complainant fatigue as reasons complaints stall at Stage 1.³³

The cumulative effect is one of diminishing returns. Complainants who navigate procedural hurdles only to receive an unsatisfactory outcome may simply conclude that further complaints are futile. Over time, individuals may hesitate to complain again, not because concerns have been resolved, but because the process appears unlikely to deliver meaningful scrutiny.

This creates a potential barrier to engagement and risks fostering a perception that the complaints system is designed to protect the BBC rather than to arbitrate concerns fairly, irrespective of Ofcom's stated intent.

³³ Ofcom, *How Ofcom deals with BBC complaints – what you need to know* <https://www.ofcom.org.uk/tv-radio-and-on-demand/bbc/how-ofcom-deals-with-bbc-complaints> notes that low escalation or referral rates should not be taken as evidence of satisfaction and that factors such as delay, clarity of response, and complainant fatigue may affect whether complaints progress beyond Stage 1.

CONCLUSION

Taken together, the evidence across eight Ofcom *Annual Reports* reveals a complaints system that is procedurally elaborate but substantively opaque. Large volumes of audience concern are absorbed at the front, progressively filtered through internal BBC processes, and only very rarely translated into independent regulatory outcomes. While this structure is lawful and, in procedural terms, effective, it has significant consequences for transparency, accountability and public confidence. The most striking feature is not the small number of Ofcom breach findings in itself, but the absence of a clear, stable and intelligible account of how complaints move from BBC First through to resolution. Core figures shift between reports, methodologies change without restatement, and key stages – particularly Stage 1 and Stage 1b – remain largely invisible in published data. For outside observers, it is extremely difficult to follow what happens to complaints over time, or to distinguish genuine trends from changes in reporting practice.

This matters because the BBC complaints system does not operate in a vacuum. It underpins public trust in a compulsory funding model and in the regulator charged with overseeing it. A system that is hard to understand, even when functioning as designed, risks appearing defensive rather than accountable. The persistent gap between high complaint volumes – especially on fundamental issues such as due impartiality – and the absence of independent regulatory findings further sharpens this perception, whether or not Ofcom’s conclusions are justified on their merits.

The continued absence of clear, end-to-end reporting points to a structural deficiency. Without stable definitions, consistent denominators, and a consolidated annual account of complaint flows, it is not possible to assess or critique the system in a coherent way. External organisations and individuals are required to reconstruct the complaints pathway from fragmented and sometimes incompatible sources. That is not a sustainable basis for a framework intended to command public confidence. Transparency should be designed into the system itself, not reliant on external reconstruction.

The longitudinal data further suggests that Ofcom’s approach is closely aligned with the BBC’s own framing of complaints, rather than operating as an independent source of

scrutiny capable of testing or overturning internal BBC conclusions. Throughout the Charter period, Ofcom has largely accepted the BBC's categorisation of complaints, relied on BBC-supplied data, and has not imposed a consolidated reporting framework of its own. Internal BBC resolutions are generally treated as conclusive unless an issue escalates into exceptional controversy.

As a result, high complaint volumes tend to be processed through procedural filters – eligibility, remit, seriousness – rather than examined as possible indicators of wider editorial failings. The effect is a regulatory stance that prioritises procedural closure over independent scrutiny. By repeatedly treating internal BBC resolutions as endpoints rather than starting points for challenge, Ofcom risks being seen less as an independent arbiter of public concern and more as a final layer of validation for the BBC's own judgement.

WAYS FORWARD

The analysis in this report does not challenge the statutory basis of the BBC First framework or Ofcom's legal authority as regulator. It does, however, identify structural weaknesses that limit meaningful external scrutiny. The following measures would strengthen clarity and accountability.

Full transparency at Stage 1

The majority of complaints conclude at Stage 1, yet beyond aggregate totals there is no public account of their subject matter, how they are grouped, or how they are resolved. At the point where most complaints are handled, visibility is lowest. Greater transparency at this gateway stage should include:

- Publication of thematic summaries of complaints received;
- Clear disclosure of how high-volume complaints are grouped and categorised;
- Explanation of how AI-assisted triage tools will operate in practice, what safeguards apply to editorially complex submissions, and the nature and scope of human oversight;
- Regular, published measurement of complainant confidence in outcomes, replicating Ofcom's 2022 Audience Perception Survey on a standardised basis;
- Measurement of discontinuation rates: the proportion of complainants who do not escalate because of dissatisfaction, delay or lack of clarity;
- Publication of stage-by-stage data showing how many complaints seek escalation, are declined at Stage 1b, are accepted for ECU review, proceed to Ofcom assessment, are taken forward to investigation, and result in breach findings.

Without such measurement, the number of complainants who give up tells us nothing about whether the system is working.

Comparability and consolidated reporting

The absence of an end-to-end account remains a central weakness. Ofcom should publish a single annual dataset tracing complaints from entry at Stage 1 through to regulatory outcome. This dataset should reconcile, within one framework:

- Complaints received
- Cases opened
- Assessments conducted
- Investigations launched
- Breach findings recorded

Aggregate figures on sensitive matters such as due impartiality should be traceable to identifiable underlying decisions. Headline totals should be capable of reconciliation with publicly available rulings.

Clear differentiation between internal BBC findings under the Editorial Guidelines and independent findings under the Broadcasting Code should be reflected consistently in published data.

Definitions must remain stable across reporting years. Where reporting scope changes – for example, limiting figures to matters ‘within Ofcom’s remit’ – historical data should be restated on the same basis or clearly flagged as non-comparable.

The Executive Complaints Unit

The ECU is the final internal stage and the principal point at which detailed reasoning becomes publicly visible. Yet only a small proportion of complaints reach it.

Greater clarity at this level should include:

- Publication of data showing how many complaints are referred to the ECU, accepted for full review, and determined;
- Greater standardisation in the structure and reasoning of published summaries to support comparability;
- Clear identification of remedial action taken following upheld or partly upheld findings;
- Explicit differentiation between editorial guidance, correction, clarification and other forms of internal response.

These measures would not alter the BBC's responsibility to adjudicate complaints under its Editorial Guidelines but would strengthen external confidence in the consistency and visibility of those determinations.

Wider structural considerations

The present framework rests on the principle that editorial complaints are resolved internally before independent regulatory consideration arises. Ofcom applies the Broadcasting Code primarily at the level of individual programmes and does not function as a general appellate body for internal BBC determinations. This allocation of responsibility reflects Parliament's design and has been affirmed in recent judicial decisions.

If transparency reform proves insufficient to address concerns about independence and public confidence, a broader question arises as to whether the BBC First architecture remains the most effective mechanism for securing trust in a compulsory licence fee system. In other regulated sectors, oversight arrangements provide clearer structural separation between subject and adjudicator. Whether a comparable model would better serve the BBC context is ultimately a matter for Parliament.

This report demonstrates that the balance between internal resolution and independent scrutiny is a defining feature of the current system and one that has material implications for accountability and public confidence in the BBC.

ANNEX A – DATA FROM THE MOST RECENT OFCOM ANNUAL REPORT ON THE BBC, (2024–25)

Under the **BBC First** system, complaints about BBC content are required to complete the BBC’s internal complaints process before they can be considered by Ofcom. At Stage 1 of this process, **160,465 complaints were received during 2024–25** and handled internally at first instance. The report does not provide a separate numerical total for Stage 1a, but notes that complaints at this stage were dealt with as part of the initial internal process.

Complaints progressing beyond Stage 1 were considered at Stage 2 by the BBC’s Executive Complaints Unit (ECU). In 2024–25, **the ECU considered 658 editorial complaints**, of which **40 were upheld as breaches of BBC editorial standards**. All of these cases were concluded within the BBC First framework.

At the regulatory stage, Ofcom received **2,204 complaints** from audiences who had directly approached the regulator with concerns about BBC content between 1 April 2024 and 31 March 2025. Only complaints that had completed the BBC First process were eligible for Ofcom’s consideration. As a result, **only 157 complaints were taken forward for assessment**, with the remainder referred back to the BBC. **Of the complaints assessed by Ofcom, none were taken forward to formal investigation or resulted in an upheld finding.**

Focusing specifically on due impartiality, Ofcom received 827 complaints during 2024–25, accounting for 33% of all BBC complaints received by Ofcom. Of these, 110 complaints were not pursued and 717 were referred back to the BBC to complete the BBC First process. No due impartiality complaints were taken forward for investigation or upheld by Ofcom during the reporting year.³⁴ During 2024–25, of the **18 cases upheld or partly upheld by the ECU, six related to due impartiality**. Looking across the current Charter period since 2017, the ECU has upheld or partly upheld **38 cases (out of a total of 178)** in which it found that the appropriate standard of due impartiality had not been applied.

³⁴ Only complaints that have been concluded by the BBC’s Executive Complaints Unit are eligible for Ofcom consideration.

During the 2024–25 reporting year, Ofcom did not uphold any Broadcasting Code breaches against the BBC for due impartiality or due accuracy, and no complaints in either category were taken forward to formal investigation. More broadly, Ofcom upheld only a very small number of complaints about BBC content during the year.

The only upheld findings concluded within the reporting period arose from Fairness and Privacy complaints. Ofcom completed eight Fairness and Privacy investigations³⁵ in 2024–25, of which two were upheld.

In addition, Ofcom reported one upheld content standards breach relating to the documentary *Gaza: How to Survive a War Zone*. Although that investigation concluded after the end of the 2024–25 performance year, it was included in Ofcom’s Annual Report on the BBC because of its significance and resulted in a formal finding of breach and a sanction.³⁶

³⁵ These complaints fall outside BBC First and may be made directly to Ofcom in cases of alleged unfairness or privacy intrusion. Of eight Fairness and Privacy investigations completed, two were upheld (Issues 496 and 497), with detailed reasoning published separately in Ofcom’s Broadcast and On Demand Bulletins.

³⁶ *Gaza: How to Survive a War Zone* was investigated by Ofcom following complaints that had completed BBC First. Although concluded after the 2024–25 performance year, the case was reported because of its public significance. Ofcom found the programme in breach of Rule 2.2 for failing to disclose a relevant familial link to the Hamas-run administration, upheld the complaint, and required the BBC to broadcast a corrective statement.

ANNEX B – CASE STUDY: REGULATORY OPACITY IN PRACTICE – NEWS-WATCH CORRESPONDENCE WITH OFCOM ON BBC COMPLAINTS DATA (2023)

BACKGROUND

In early 2023, as part of its monitoring of BBC complaints data, News-watch undertook a review of the Executive Complaints Unit’s published findings.³⁷ The aim was to understand how figures on upheld complaints and due impartiality rulings were being derived in practice. This involved examining hundreds of ECU decisions, cataloguing all upheld and partly upheld cases, and comparing the substance of those determinations with the totals reported in Ofcom’s Annual Reports.

The exercise revealed a number of inconsistencies and ambiguities. News-watch approached Ofcom seeking clarification.

Issue 1: ‘Complaints’ vs ‘cases’

Ofcom’s response opened by drawing a distinction between ‘complaints’ (individual audience submissions) and ‘cases’ (a programme or item that may attract multiple complaints). It argued that several apparent discrepancies arose because figures relating to cases were being compared with figures relating to complaints.

On a technical level, this clarification is valid. But the need for it exposes a deeper problem. Across the Annual Reports themselves, the distinction is assumed rather than clearly set out. Complaint volumes and ECU outcomes are presented in close proximity, without an explicit explanation that a single ECU case may encompass multiple complaints. Year-on-year totals are displayed in ways that invite comparison or aggregation.

The consequence is that an external reader, attempting to reconcile figures across reports, can arrive at reasonable but incorrect conclusions through no fault of their own. The fact that Ofcom relied on private correspondence to clarify a foundational definitional distinction suggests this distinction was not sufficiently clear in public documentation.

³⁷ <https://www.bbc.co.uk/contact/recent-ecu>

Issue 2: Cumulative figures that cannot be audited

News-watch queried an apparent discrepancy between cumulative figures for ECU upheld items across reports, noting that year-by-year totals appeared to sum to 126 rather than the 125 cited in the Fifth Annual Report.

Ofcom responded that the earlier figures referred to ‘cases’, not ‘complaints’, and that therefore the totals were not directly comparable. While this explanation is plausible, it highlights a critical transparency issue: the figure of 125 could not be independently reconstructed from publicly available ECU publications. News-watch had catalogued all available upheld ECU decisions and could identify only 124 relevant items. The remaining discrepancy could not be resolved without access to internal classifications or unpublished material.

Issue 3: Due impartiality and unanswered substantive questions

A central question raised by News-watch concerned the claim that, since 2017, there had been 25 instances where the ECU found that due impartiality had not been applied. News-watch asked which specific decisions were included in this count and which were excluded, noting that its own review of ECU summaries identified a different distribution.

Ofcom’s response did not answer this substantive question. Instead, it reiterated that the figure referred to cases rather than complaints and declined to provide a list of the relevant decisions.

This is significant. Due impartiality is one of the most politically salient aspects of BBC regulation. Publishing an aggregate figure without providing a traceable list of the underlying decisions prevents meaningful external verification and invites scepticism about categorisation.

Issue 4: ‘Within Ofcom’s remit’ – a methodological break

News-watch also identified a break in Ofcom’s reporting methodology. Earlier Annual Reports had presented figures for complaints progressed to the ECU without restricting them to matters within Ofcom’s regulatory remit. The Fifth Annual Report shifted to reporting only ECU cases ‘within Ofcom’s remit’, breaking comparability with previous years.

Ofcom's response stated that it does not hold data on complaints outside its remit and that figures were supplied by the BBC, suggesting further queries should be directed to the BBC.

This response does not address the core concern. The issue was not Ofcom's legal remit, but the presentation of data in a way that implied continuity where none existed. By changing the denominator without restating earlier figures on the same basis, Ofcom made longitudinal analysis difficult if not impossible.

Issue 5: Internal inconsistencies within a single report

Finally, News-watch queried why the Fourth Annual Report appeared to state both that 19 complaints were upheld or partially upheld in 2020/21 and that there were 18 upheld cases. Ofcom explained that 19 individual complaints related to 18 ECU cases and that both figures were therefore correct.

This explanation resolves the narrow discrepancy, but it again demonstrates how the same underlying events can generate different headline numbers without adequate signposting.

Overall assessment

Taken together, the exchange reveals broader transparency issues rather than isolated errors. Key distinctions are assumed rather than explained. Aggregate figures are published without clear audit trails. Methodological changes are not consistently signposted.

Clarification is available, but it is reactive rather than embedded in the public reporting itself.

The result is a reporting environment in which informed external scrutiny is possible only with significant effort and institutional knowledge. For a complaints system whose legitimacy rests on public confidence, this is a weakness that warrants attention.