

NEWS-WATCH

Submission to the DCMS Media Green Paper

Watch this space: a new strategic direction for UK media

Prominence, media literacy, BBC accountability and the protection of the public square

Submitted by News-watch | 28 August 2026

Executive summary

News-watch welcomes the Green Paper's recognition that the conditions in which citizens encounter news have become a central democratic question. Its description of a fragmented, algorithmically ordered media environment is substantially correct. Its proposed remedy, however, contains a serious constitutional risk. The Government is consulting on legislative options that would require social-media platforms, and potentially video-sharing platforms, to make content from public-service media and other qualifying news providers prominent and easily discoverable. It is also considering a media-literacy duty on public-service media providers and a coordinated initiative involving those providers, Ofcom, civil-society bodies and technology companies. Taken together with Ofcom's existing powers under the Online Safety Act 2023 and its Making Sense of Media programme, these measures could create an extensive information-governance architecture capable of influencing which sources citizens see, which sources they are encouraged to trust and how contested claims are classified.

That architecture is being proposed before the most important beneficiaries of it, above all the BBC, have been made effectively accountable for the accuracy and impartiality on which their preferred status is premised. News-watch's research over more than 25 years demonstrates that failures of BBC impartiality are frequently cumulative: they arise through patterns of contributor selection, framing, language, omission and editorial emphasis across many items and over time. Yet the complaints system and Ofcom's regulatory practice assess isolated programmes or narrowly linked series. Across the eight reporting years from 2017/18 to 2024/25, 2,275,387 complaints were recorded by the BBC; only 4,944 reached its Executive Complaints Unit. The BBC upheld or partly upheld just 38 due-impartiality complaints. Ofcom recorded four BBC breaches in that period, only one concerning due impartiality. The system

therefore supplies no sound basis for treating institutional status, regulatory inclusion or reported public trust as a guarantee of trustworthiness.

News-watch recommends that DCMS should not legislate for any statutory news-prominence regime unless and until it has established precise, viewpoint-neutral and independently appealable eligibility rules; strengthened the BBC and Ofcom complaints system so that cumulative evidence can be adjudicated; and required transparent disclosure of all material governmental and regulatory relationships involved in media-literacy delivery. Media literacy should develop citizens' independent powers of judgement. It should include critical scrutiny of government, regulators, public-service broadcasters and established news organisations, as well as claims circulating on social media. Safeguards are needed to prevent contested editorial judgements from public bodies and favoured institutions being transferred into platform design, educational material, trust signals or algorithmic ranking.

1. About News-watch

News-watch was established in 1999 following the work of a cross-party commission of peers concerned about BBC impartiality. Its research is based on recorded and transcribed programmes and combines quantitative measures of contributor balance and airtime with qualitative assessment of framing, language, editorial assumptions and significant omissions. It has produced more than 50 formal monitoring surveys and around 70 wider reports. Its principal is David Keighley, formerly the BBC's Head of News and Current Affairs Publicity and Controller of Public Affairs at TV-am.

News-watch's particular contribution to this consultation lies in its evidence about the gap between institutional claims of impartiality and the capacity of the regulatory system to test them. Its work has repeatedly shown that the most consequential forms of imbalance are often visible only across a body of output. The present submission follows News-watch's response to Ofcom's consultation on regulation of BBC online material, in which it argued for a defined route by which evidence of cumulative imbalance across related online output could be considered.

2. The Green Paper's central contradiction

The Green Paper begins from an attractive democratic proposition: a healthy country needs a shared civic realm in which citizens can obtain reliable information and encounter a genuine plurality of argument. It then makes an assumption which the evidence does not sustain. Public-service media providers are treated throughout as inherently 'trustworthy', while the principal policy question becomes how their content can be made more prominent and how their authority can be used to educate audiences. The Green Paper says that public-service providers deliver 'high-quality impartial news' and describes regulated television as a public square in which news is held to high standards. These assertions describe the purpose of the regulatory compact; they do not demonstrate that the compact is working.

Trust is neither a permanent institutional property nor a substitute for verification. It is an outcome that must be continually earned through editorial performance, transparency, correction and effective independent redress. The Government's proposals reverse that order. They contemplate awarding reach and pedagogic authority first, while leaving unresolved the inability of the present system to adjudicate important evidence about systemic performance. This matters particularly in the BBC's case because its scale, public funding, regulatory privileges and cross-platform reach already give it exceptional agenda-setting power.

The democratic risk arises from convergence. One arm of policy governs harmful online content through the Online Safety Act and Ofcom's statutory powers. A second, softer arm is being developed through Ofcom's Making Sense of Media programme, media-literacy recommendations, partnerships, research, training and design principles. The Green Paper would add a third: privileged discoverability for selected news providers, a new duty on public-service media and a coordinated initiative involving government, Ofcom, media organisations, civil society and technology companies. Each element may be presented as limited. In combination, they would influence visibility, authority and the categories through which citizens are encouraged to understand disputed information.

3. "Trustworthy news" cannot be defined by institutional status

The consultation acknowledges that the criteria for a 'trustworthy news provider' have not been determined. That is not a detail to be settled after acceptance of the principle; it is the core constitutional question. A prominence regime necessarily advantages some speakers over others. It will affect audience reach, advertising, subscription income, political influence and the practical boundaries of public debate. A definition based principally on recognised news publisher status, public-service designation, membership of a regulator or the possession of a complaints code would reward institutional form rather than demonstrated editorial performance.

Public-service broadcasters and established publishers possess many strengths: professional newsrooms, legal oversight, correction processes and the resources to report at scale. They are also capable of serious error, selective reporting, groupthink and sustained editorial imbalance. Official bodies can disseminate inaccurate or incomplete information, particularly during rapidly developing crises. A credible policy must therefore apply the same habits of verification and scepticism to official, regulatory and mainstream-media claims as it seeks to apply to unfamiliar or online sources.

News-watch proposes that any eligibility framework should be grounded in published and auditable criteria, applied by a body institutionally separate from Ofcom's enforcement and media-literacy functions. Relevant criteria for individual providers could include ownership and funding transparency; clear separation of news from comment; publication of material corrections; effective and timely complaints arrangements; and disclosure of significant conflicts. The prominence system as a whole should then be assessed for genuine viewpoint plurality, without imposing disproportionate audit burdens that would exclude smaller or

specialist providers. Eligibility should be time-limited and subject to review. Decisions should be reasoned, open to challenge and capable of suspension where performance falls materially below the required standard.

4. BBC accountability must precede privileged prominence

The BBC is central to the Green Paper's scheme. It has the greatest cross-platform reach of any UK news provider and would be a leading beneficiary of prominence. It would also be expected to help the public assess other information. The existing complaints framework does not justify conferring those additional advantages without prior reform.

News-watch's survey of the eight reporting years from 2017/18 to 2024/25 recorded 2,275,387 complaints received by the BBC. Only 4,944 reached the Executive Complaints Unit. The BBC upheld or partly upheld 38 due-impartiality complaints. Ofcom recorded four breaches by the BBC, only one of which concerned due impartiality. Ofcom's own audience research reported that fewer than one in five complainants had a satisfactory complaints experience; it also found that 42 per cent of adults who had cause to complain but did not do so believed it would make no difference. These figures do not establish that the great majority of rejected complaints were meritorious. They establish that the route from public concern to an authoritative finding is extraordinarily narrow and that the system commands limited confidence.

Two judicial-review proceedings brought by David Keighley, as principal of News-watch, illuminate the limits of the existing arrangements. *R (Keighley) v BBC* [2019] EWHC 3331 (Admin) concerned the BBC's use of performance measurements and metrics in assessing its delivery of impartiality, rather than the adjudication of a systemic impartiality complaint. *R (Keighley) v Ofcom* [2025] EWHC 416 (Admin) concerned the legal distinction between a programme or editorially linked series and service-wide output for the purposes of due impartiality. Neither proceeding adjudicated whether the BBC's output was in fact impartial or tested News-watch's cumulative evidence. The practical problem therefore remains: an allegation about a pattern across a service can be supported by extensive evidence yet fall outside the unit of analysis used for regulatory adjudication.

This defect is particularly acute online. A subject may be covered through live pages, clips, headlines, app alerts, social posts, explainers, podcasts and repeated or repackaged video. The cumulative audience impression is created across these forms, while complaints are fragmented into individual 'items' or a BBC-defined linked series. The regulatory unit does not match the way editorial influence is produced or experienced. News-watch's Ofcom submission therefore proposed a tightly bounded cumulative route: the complainant would define the issue and period, identify a corpus or representative sample, disclose the selection method and explain the alleged pattern. Ofcom would then be required to address the evidence and give reasons. If present legislation prevents that, DCMS should identify and amend the precise legal constraint.

Since the period covered by News-watch's survey, Ofcom has been given a new duty to review samples of complaints reaching the BBC's Executive Complaints Unit and has consulted on an enforceable code for BBC online material. These are relevant developments, but they do not resolve the structural concern identified here. Sample review begins only at the stage reached by 4,944 of the 2,275,387 complaints recorded during the eight reporting years examined, while the proposed online framework does not establish a route for adjudicating an alleged cumulative pattern across multiple items and platforms.

5. Making Sense of Media and the expansion of soft information governance

Ofcom already occupies a powerful position in the communications system. In broadcasting it draws up and enforces the Broadcasting Code, decides whether due accuracy and due impartiality requirements have been breached, investigates complaints and can publish findings, impose financial penalties and, where applicable, suspend or revoke licences. Under the Online Safety Act it has acquired substantial responsibilities affecting platform systems and risk management. Alongside those formal powers it has, since 2019, developed Making Sense of Media (MSOM), describing itself as a convenor and catalyst and seeking to make media literacy 'everyone's business'.

MSOM does not itself regulate lawful opinion. Its significance for this consultation lies in its reach, relationships and direction. Ofcom is galvanising an ecosystem of platforms, broadcasters, fact-checking and media-literacy organisations, charities, educational bodies and researchers. Its work encompasses research, training, partnership, best-practice promotion and interventions embedded in the environments through which people encounter information. The Green Paper proposes to align a new joint initiative with this work. On 24 June 2026, Ofcom published ten recommendations for broadcasters, online platforms and other services. Their emphasis on meaningful user choice, transparency about recommender systems, critical assessment of credibility and published evaluation is welcome. The remaining question is how materials, partners and standards of credibility will be selected, and how viewpoint neutrality and independent scrutiny will be secured.

The boundary between enabling judgement and guiding judgement is therefore crucial. Media literacy can teach people to inspect sources, distinguish evidence from assertion, recognise manipulation, seek contrary evidence and tolerate uncertainty. It can also be used to supply approved sources, warnings, labels, trust signals and behavioural nudges that embed the judgements of institutions whose own assumptions are politically contestable. Because these techniques may be distributed through schools, platforms, public-service media and civil-society partners, their effect can be deep even where no content is formally prohibited.

News-watch submitted a Freedom of Information request to Ofcom on 31 May 2026 after being unable to locate a single consolidated public account of MSOM costs, grants, contracts, partners, advisers, delivery bodies and platform involvement. The request sought to establish the scale and governance of activity that is otherwise dispersed across multiple programmes and publications. Before DCMS expands or coordinates this architecture, Parliament and the

public should be given a full map of public expenditure, commissioned research, delivery partnerships, selection processes, evaluation criteria, platform interventions and governance arrangements.

6. The proper purpose of media literacy

News-watch strongly supports the development of citizens' capacity to judge accuracy and reliability. It is very concerned about misleading information and its effects on society and democracy. Those concerns extend to every source of public information. The Green Paper's questions risk producing an artificial choice between supporting media literacy and opposing it. The decisive issue is what kind of media literacy is proposed, who controls it and whether it enlarges or narrows independent thought.

A legitimate programme should be epistemically open and viewpoint-neutral. It should teach transferable methods rather than conclusions on live political controversies. It should distinguish demonstrably false factual claims, manipulated media, disputed interpretation, prediction, moral judgement and legitimate minority opinion. It should explain that consensus may be relevant evidence but is not an instruction to close inquiry. It should disclose the provenance of teaching materials, research funding and partner involvement. It should measure success through improved reasoning and source evaluation, rather than greater agreement with official or institutional positions.

Public-service media can contribute materials and professional knowledge, but the proposed duty should not evolve into a supervisory role over the wider information environment. A broadcaster that reports on government, science, migration, war, climate and culture is itself an interested participant in controversies about framing, authority and evidence. Its media-literacy activity should therefore be independently audited for viewpoint neutrality and subject to equivalent standards of editorial accountability. If public-service media providers are involved in decisions about which external sources receive trust labels or prominence, that function should be structurally and editorially separated from their journalism.

7. Required safeguards

If the Government proceeds, the following safeguards should be treated as preconditions rather than aspirations:

- A statutory framework for prominence eligibility, with precise published criteria and procedures. Accompanying guidance should distinguish demonstrably false factual claims and deceptive synthetic media from disputed interpretation, opinion and lawful political advocacy; terms such as 'misinformation', 'disinformation', 'trustworthy' and 'authoritative' should not be left to informal operational interpretation.
- Viewpoint-neutral, published eligibility criteria for prominence, applied equally to public-service, commercial, local and independent providers and reviewed at fixed intervals.

- A genuinely independent appeal body with power to examine evidence, reverse eligibility and prominence decisions, publish reasons and order correction of erroneous classifications.
- A route for cumulative complaints about BBC and other regulated public-service output, covering related content across programmes, websites, apps, clips, podcasts and social accounts.
- Full transparency over public funding, contracts, grants, partners, advisory groups, research methodologies, data, platform trials, trust indicators and behavioural interventions associated with media literacy.
- An express requirement that media-literacy programmes examine error and manipulation by government, regulators, public-service broadcasters, established publishers and fact-checking organisations as well as by social-media users and hostile actors.
- User control over prominence. Users should be able to switch the feature off, understand why content has been promoted and choose among plural sources. There should be no covert downranking of lawful news as the counterpart of promotion.
- Special protection during crises and elections. These are precisely the periods in which disputed facts, incomplete official information and pressure for conformity are most intense. Any temporary intervention should be narrowly defined, time-limited, publicly notified and independently reviewed.
- Separation of functions within Ofcom. The regulator should not simultaneously define best practice, fund or convene delivery bodies, participate in information campaigns, enforce online-safety duties and adjudicate complaints without robust structural safeguards against institutional conflict.
- Regular parliamentary review based on published evidence of effects on plurality, reach, public trust, excluded providers, false positives, corrections and viewpoint diversity.

8. Responses to the consultation questions

News-watch responds below only to those questions falling directly within its research and regulatory expertise.

Question 1: overall views

The Green Paper correctly recognises the democratic importance of a shared public realm and the power that algorithms exercise over news discovery. Its proposed interventions place excessive confidence in institutional designation and reported trust, while giving insufficient attention to accountability, plurality and freedom of expression. Reform should begin by repairing the mechanisms through which the performance of public-service media is tested. Prominence and media-literacy authority should follow demonstrated performance and effective redress.

Question 3: frequency of encountering untrustworthy news

News-watch selects 'Often'. The category must include inaccurate, materially incomplete or misleading content from established and official sources as well as content encountered on social media. A respondent's perception is useful evidence about confidence, but it cannot itself determine whether content is false.

Questions 4 and 4a: greater visibility for trustworthy news

News-watch selects 'Not sure' to Question 4 because the answer depends entirely on the definition, governance and practical effect of prominence. Content meeting clear professional standards can usefully be made easier to discover, particularly where users actively seek news. A statutory regime that confers preferred visibility on institutionally selected providers before those criteria and safeguards exist would risk entrenching incumbents and narrowing the public square.

In practice, any facility should be user-directed. Platforms could offer a clearly labelled news panel or filter containing a plural selection of sources, with an explanation of why each source qualifies and tools enabling users to vary or disable the selection. Promotion should be transparent and should not entail the hidden suppression of lawful alternatives.

Question 5: permanent or crisis-only prominence

News-watch selects 'Not sure'. An always-on statutory privilege would create durable market and political advantages. Crisis-only intervention creates a different danger because official information is often incomplete and disputed during fast-moving events. No regime should operate until objective triggers, time limits, source plurality, correction procedures and independent review have been established.

Question 6: user choice

News-watch selects 'Yes'. Users should be able to switch prominence measures on or off, inspect and modify their preferences and see why material has been recommended. Genuine user control is a minimum democratic safeguard.

Questions 7 and 8: misleading information and society/democracy

News-watch selects 'Very concerned' for both questions. Misleading information can damage public safety, democratic choice and social trust. The same is true when powerful institutions omit relevant perspectives, treat contested propositions as settled or use regulatory and technological authority to marginalise legitimate dissent. The policy response must therefore address institutional as well as decentralised misinformation.

Question 9: the role of public-service media

None of the offered answers adequately captures News-watch's position. Public-service media can support critical engagement, but should do so only within a framework of strict viewpoint neutrality, independent audit and effective accountability for their own output. News-watch would select 'Public service media has a role in supporting critical engagement, and should do more' only if the accompanying text is accepted as an essential qualification. 'Doing more'

should mean improving public reasoning, disclosing uncertainty, presenting competing evidence fairly and opening the broadcasters themselves to scrutiny.

Question 10: judging accuracy and reliability

News-watch selects 'Very important'. The ability should be cultivated through methods that remain useful regardless of the source or political conclusion: checking primary evidence, distinguishing fact from interpretation, identifying omissions, comparing accounts, understanding incentives and revising conclusions when evidence changes.

Questions 11, 12 and 12a: collaboration

News-watch selects 'Somewhat valuable' for Question 11. Collaboration can share research and reach underserved audiences, but can also produce a closed institutional consensus in which the same organisations define the problem, fund the intervention, select the sources and evaluate the result. This danger is heightened where Ofcom combines statutory authority with a convening and standard-setting role.

For Question 12, News-watch selects 'A structured forum with agreed objectives and reporting', subject to open membership, published minutes, full financial disclosure, published membership criteria, representation of independent organisations and a genuine range of perspectives, transparent evidence standards and external evaluation. Informal coordination is too opaque for activity capable of shaping the information environment. Joint public-facing initiatives should not proceed until the governance framework and complaints route are established.

Question 21: future television regulation

Regulation should follow the public-service function and the real form of audience exposure, rather than the historical delivery route alone. Where a public-service broadcaster publishes news or current-affairs material through websites, apps, on-demand services, podcasts, clips or social platforms, equivalent obligations appropriate to the form of content—including due accuracy in news and due impartiality in news and current affairs—should apply. This does not justify extending broadcast impartiality rules to every independent online speaker. The distinctive obligations arise from public funding, statutory status, licensed privileges and any new prominence benefit.

The unit of regulation must also reflect digital publication. A complaint route confined to one item or a broadcaster-defined linked series cannot adequately address repeated framing across a campaign, subject area or cross-platform package. DCMS should legislate for a bounded cumulative-evidence procedure and require access to sufficient publication, reach and recommendation data for Ofcom to assess the audience experience. The regulator's decisions, correspondence, methodology and reasons for declining investigation should be published in searchable form.

9. Recommendations to DCMS

News-watch urges DCMS to redesign this part of the Green Paper around accountability before privilege. In particular, the final policy should:

- withhold legislation for trustworthy-news prominence until Parliament has approved precise eligibility, transparency and appeal provisions;
- reform BBC and Ofcom complaints law to permit tightly defined cumulative and cross-platform impartiality cases;
- commission an independent audit of the BBC complaints system and of the evidence used to describe public-service news as trustworthy;
- publish a complete governance and funding map of MSOM and the proposed joint media-literacy initiative;
- define media literacy as the development of independent critical judgement and prohibit its use to prescribe conclusions on contested political questions;
- require user choice, explanation and source plurality in any prominence mechanism; and
- create structural separation and parliamentary oversight for Ofcom's enforcement, convening, funding, standard-setting and complaints functions.

Conclusion

The public square cannot be restored by appointing a class of trusted institutions and increasing their visibility. It depends on open argument, plural sources, reliable evidence and institutions that can be challenged when they fail. The Green Paper has identified a genuine problem, but its present solution risks consolidating the authority of organisations whose systemic performance the regulatory system is poorly equipped to examine. The combination of privileged prominence, public-service media literacy and Ofcom-coordinated delivery would carry consequences far beyond ordinary media support.

DCMS should use this consultation to establish a different sequence. First make public-service media accountable across the full range of their digital output. Then define transparent and contestable standards. Protect the citizen's freedom to choose sources and require every participant, including government and regulators, to be open to scrutiny. On that foundation, media literacy can strengthen democratic judgement. Without it, the policy may turn the ideal of an informed society into a system for managing what society is encouraged to regard as informed.

Selected sources

Source	Reference
Department for Culture, Media and Sport	<i>Watch this space: a new strategic direction for UK media</i> - green paper and public consultation, 23 June 2026 (updated 29 July 2026). Link
Online Safety Act 2023	Recognised news publisher provisions and Ofcom's online-safety framework. Link
Ofcom	Making Sense of Media: Ofcom's media literacy programme and strategy. Link
High Court	R (Keighley) v BBC [2019] EWHC 3331 (Admin). Link
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News-watch	Online archive of News-watch research and media surveys. Link
News-watch	Submission to the BBC Charter Review, including the complaints analysis covering 2017/18 to 2024/25. Link
Ofcom	BBC complaints research: BBC must transform the way it serves audiences, 22 June 2022. Link
Ofcom	Recommendations for online platforms, broadcasters and services to promote media literacy, 24 June 2026. Link
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