# DEFINING IMPARTIALITY IN EUROPEAN PUBLIC SERVICE MEDIA. A COMPARATIVE ANALYSIS OF THE BBC, RTÉ, AND VRT.

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ABSTRACT Amid growing criticism and political scrutiny, defining and operationalising impartiality has become essential for public service media (PSM). This research examines how impartiality is conceptualised across policy, editorial guidelines, and regulatory oversight in three Western European markets through a comparative analysis of documents from the BBC (United Kingdom), VRT (Flanders-Belgium), and RTÉ (Ireland). The article demonstrates that, first, while regulatory obligations enforce 'impartiality', clear definitions in policy documents are lacking; second, editorial guidelines on impartiality show that it should be perceived as a process rather than as a measurable, achievable state of journalistic performance. Finally, the article shows the increased importance of complaint mechanisms and gatekeepers addressing concerns about impartiality and its (audience) perception. Simultaneously, it demonstrates that existing assessments fall short in researching its complexity, contributing to the perception that impartiality is an achievable state of journalism that can be achieved in news reporting by journalists.

#### **KEYWORDS**

PUBLIC SERVICE MEDIA, IMPARTIALITY, INDEPENDENCE, BALANCE, VIEWPOINT DIVERSITY, POLICY ANALYSIS

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## INTRODUCTION

The concept of impartiality emerged at the BBC a century ago in response to demands for public broadcasters to provide balanced reporting and protect their independence from commercial and political interests (Bélair-Gagnon, 2013, p. 481). Since then, impartiality, alongside fairness, accuracy, independence, and accountability, has become a core journalistic value for public service media (PSM) (Cushion et al., 2017; EBU, 2012; Sambrook & Cushion, 2024). The *European Media Freedom Act* (EMFA) states that "public service media providers play a particular role in the internal market for media services by ensuring that citizens and businesses have access to a diverse content offering, including quality information and impartial and balanced media coverage" (2023, p. 7). Similarly, the European Broadcasting Union (2012) highlights impartiality as a fundamental editorial principle safeguarding PSM independence.

Although criticism of perceived bias in PSM reporting has been a recurring theme throughout public broadcasting history, recent years have seen intensified scrutiny and political attacks accusing PSM of failing to represent all societal views. In the United Kingdom, debates surrounding a perceived "political correctness" and alleged left-wing bias have shaped discussions about the BBC's remit and public purposes. These issues also arose during the appointment of the current BBC Director-General, Tim Davie, who was said to be appointed in part to deal with the BBC's "wokeness" (Thorpe, 2020). The controversy over BBC personality Gary Lineker's social media comments on government policies further underscored both the difficulties and delicacies of impartiality for the BBC, as elaborated in the section on the UK context and analysis (Glynn & McIntosh, 2025). Similarly, in Flanders, political rhetoric prior to the renewal of VRT's management contract in 2020, mainly from centre and (radical) right-wing parties, emphasised a perceived clear need for a "more neutral" broadcaster and enhanced scrutiny of its "neutrality". In Ireland, socio-cultural and economic divides between rural and urban, progressive, and conservative audiences have been reflected in criticism of RTÉ's reporting (Raats et al., 2022). Globally, populist and radical voices have increasingly challenged legacy media's legitimacy, further eroding public trust in news provided by these organisations (Sehl et al., 2020; Wolleschensky & Sehl, 2025).

For PSM, defining impartiality and devising strategies to achieve it in newsrooms and programming have gained prominence at the European policy level. Consequently, guidelines and regulations addressing impartiality have become embedded in regulatory frameworks and editorial codes. However, scholarly analyses, particularly those focusing on the BBC (Bélair-Gagnon, 2013; Cushion et al., 2017; Hughes et al., 2023), have identified normative conflicts and complexities in defining impartiality (Ojala, 2021). Critics have argued that efforts to enforce impartiality may paradoxically undermine the political independence they seek to protect (Boudana, 2016; Mont'Alverne et al., 2023). As such, the concept remains ambiguously defined and its dual conceptualisation as non-partisanship and viewpoint diversity is often used interchangeably with related values such as neutrality and objectivity. Finally, studies attempting to measure impartiality highlight

the challenges of capturing the intricacies of impartiality and viewpoint diversity (Masini et al., 2018; Masini & Van Aelst, 2017).

This research examines how impartiality is defined and implemented in PSM policy and strategy across European contexts. It explores whether regulatory definitions and guidelines function as mechanisms to enable and safeguard PSM independence or, conversely, constrain it. Specifically, the study addresses three key questions: (i) How is impartiality defined and operationalised at the levels of policy, editorial guidelines, and regulatory oversight? (ii) What are the core dimensions constituting editorial guidelines on impartiality? (iii) How is impartiality monitored internally and externally? Using a comparative case study approach, further explained in the methodology section, this research focuses on three PSM organisations: the BBC (United Kingdom), VRT (Flanders-Belgium), and RTÉ (Ireland). The analysis is based on a review of policy documents, government charters, management contracts, editorial guidelines, as well as additional regulatory contexts to understand decisions made by these broadcasters and the relevance of impartiality in each case.

This contribution fills a gap in PSM research by focusing on the regulatory definitions and applications of impartiality in PSM editorial codes. It adds to the growing body of literature on the transformations of PSM independence and legitimacy in Europe's evolving political and societal landscape. Drawing on existing scholarship on impartiality and PSM, the article formulates a definition of impartiality rooted in non-partisanship and viewpoint diversity while addressing its problematic nature across policy frameworks, internal guidelines, and regulatory oversight.

## THEORISING IMPARTIALITY BEYOND DISCOURSE: NON-PARTISANSHIP AND BALANCE

Research on impartiality is an established part of the field of journalism studies, that so far has included a wide array of topics and stakeholders. Broad studies examining journalistic practices contextualise impartiality within discussions on disinformation and trust (Boudana, 2016; Ojala, 2021; Sehl, 2024). Comparative case studies employing qualitative methodologies further contribute to the field, such as Mont'Alverne et al.'s (2023) investigation of public perceptions of impartiality. Much of the existing research focuses on public broadcasters in Europe, addressing challenges in navigating populist criticisms and their role within a dynamic digital news environment (Michalis & D'Arma, 2024; Rodríguez-Castro et al., 2024). Among these studies, the BBC is often highlighted as a central case, owing to its reliance on policy documents and editorial guidelines to ensure impartiality (Cushion et al., 2017; Hughes et al., 2023; Sambrook & Cushion, 2024).

Across these studies, impartiality is consistently analysed in relation to values such as objectivity and neutrality, though interpretations of their interrelation vary. Some scholars argue for their interchangeability; for instance, Ojala (2021) conceptualises impartiality as a dimension of neutrality, together with non-interference. By contrast,

Cushion et al. (2017) argue for its distinctiveness, noting that objectivity aims to uncover singular, empirical truths, whereas impartiality recognises contestations of truth. In this interpretation, editorial guidelines encourage journalists to present "the most truthful versions of the truth" (p. 211).

A shared conceptualisation of impartiality in the literature combines two core elements: non-partisanship and viewpoint diversity. Cox (2007, cited in Wahl-Jorgensen et al., 2017, p. 783) defines impartiality as an attempt to regard differing ideas, opinions, and interests with detachment. The first element of non-partisanship, according to Boudana (2016, p. 603), is essential for maintaining journalistic independence and protecting PSM from political interference and commercial pressures. Establishing non-partisanship enables public broadcasters to position themselves as independent entities, distinct from state-controlled media, thus safeguarding editorial autonomy and legitimising their public mission (Barwise & York, 2020). The second element, viewpoint diversity, entails representing a broad spectrum of societal perspectives (Donders, 2021; Wahl-Jorgensen et al., 2017). Cushion and Lewis (2017) differentiate between objectivity, which seeks factual accuracy, and impartiality, which emphasises balance by allocating equal space to opposing views. This balance aligns with the academic concept of "viewpoint diversity," associated with plurality and universality (Napoli, 1999). Presenting diverse viewpoints ensures that citizens are exposed to a wide array of information, fostering informed citizenship. In this context, impartiality aims to mitigate bias and present contested truths as transparently as possible.

Despite this conceptual framework, scholars are divided on the practical value of impartiality for PSM. Some scholars focus on impartiality as prescribed by editorial guidelines (Cushion & Lewis, 2017; Hughes et al., 2023). Boudana (2016, p. 603) critiques impartiality as an impractical standard, arguing that its implementation can paradoxically introduce bias into news reporting. She advocates for replacing impartiality with fairness, which she considers more feasible to operationalise. Meanwhile, evaluations of impartiality, often commissioned by governments or PSM, tend to focus on specific types of coverage and employ multi-methodological approaches, yet they seldom produce conclusive evidence of bias (Blastland & Dilnot, 2022; Van Aelst et al., 2024; Wahl-Jorgensen et al., 2017).

Operationalising impartiality presents additional challenges. More diversity in the representation of actors in news coverage may suggest broader viewpoint diversity (Masini et al., 2018; Masini & Van Aelst, 2017), but achieving meaningful balance, particularly in multiparty political systems, is fraught with complexities. Furthermore, normative debates on the content featured and the weighting of opinions often result in hierarchies, particularly when addressing radical perspectives (Hopmann et al., 2012). Nonetheless, combining qualitative assessments of impartiality with quantitative analyses of actors represented in news content has added depth to recent studies of impartiality, generally commissioned by national monitoring agencies (see Jigsaw Research, 2024; Sumption, 2024; Van Aelst et al., 2024).

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In summary, academic literature generally embraces a twofold conceptualisation of impartiality, encompassing non-partisanship and viewpoint diversity. However, disagreements persist regarding its practical application and value for PSM. These arise from conceptual ambiguities, operational challenges, and the absence of clear benchmarks, underscoring the need for further research to clarify the role of impartiality in public service broadcasting.

### **METHODOLOGY**

This study addresses persistent concerns regarding impartiality in PSM by conducting an in-depth analysis of how the concept is defined and operationalised within these organisations. We employed a comparative case study approach, identifying three case studies - the BBC, VRT1, and RTÉ. The three PSM entities are classified in the model of Hallin and Mancini (2004) as democratic corporatist (Belgium) and liberal (Ireland, UK). These two models are similar in demonstrating (i) high professionalism in journalism, (ii) an approach of media freedom actively protected with limited political parallelism, (iii) formal differentiation between government-appointed oversight and managerial decisions, and (iv) a newsroom that acts independently overseeing its own editorial strategy. These similarities are reiterated in the State Media Monitor, mapping PSM typologies based on editorial independence, funding, and degree of state ownership (Dragomir, 2025, p. 76). In this model, VRT and RTÉ are classified as Independent State-Funded and State-Managed (ISFM), and the BBC as Independent Public (IP) (p. 77). However, their operation within increasingly polarised societies (Cushion & Thomas, 2019; Raats et al., 2021, 2022) and their exposure to intensified criticism by political actors and other stakeholders remain pressing issues. Furthermore, all three PSM have formalised definitions and operationalisations of impartiality within their regulatory documents and internal editorial guidelines. Despite financial constraints, they maintain control over their own managerial structures and continue to play a significant role in their respective media markets, supported by funding models and management contracts that enable a comprehensive PSM framework (Raats et al., 2022).

The analysis relies on a qualitative document analysis (Puppis, 2019) of a curated selection of documents that explicitly reference impartiality. These include management contracts, media regulations, internal editorial guidelines, and independent monitoring and evaluation reports. This approach ensures a thorough examination of how impartiality is defined, implemented, and assessed across different levels. At the policy level, the analysis focuses on how impartiality is articulated within management contracts and broader media regulations. For internal editorial guidelines, attention is directed towards the practical application of impartiality in journalistic content and staff behaviour. At the level of regulatory oversight, the study examines the ways in which reports assess impartiality, as well as how relevant complaints are addressed by editorial staff. The analysis did not extend to rulings regarding breaches of impartiality due to their volatile nature, as in the latest case of the Ofcom ruling on GB News and their prominence in the UK (Ofcom, 2025).

<sup>&</sup>lt;sup>1</sup> Citations from VRT documents have been translated by the authors

We used MAXQDA software for qualitative analysis to code documents according to these three levels. We coded documents to isolate and compare existing definitions, links between impartiality and other relevant values (e.g. objectivity, pluralism), and relevant sections of documents, identifying relevant dimensions as discussed in the analysis. This allowed for a systematic analysis of definitions, guidelines for the implementation and evaluation of impartiality, and the formulation of lessons learned across the three cases. By addressing these distinct levels, our research presents a comprehensive understanding of the multidimensional nature of impartiality within PSM.<sup>2</sup>

# CONTEXTUALISING THE INCREASED ATTENTION FOR IMPARTIALITY IN PSM POLICYMAKING

Defining impartiality does not occur in isolation. Public contestations, stakeholder demands, and political perceptions of the role and value of PSM contribute to scenarios in which impartiality must continually evolve and adapt.

The renewal of the latest *BBC Charter*, which came into effect in 2016, began with an inquiry into the BBC's future and a consultation paper issued by the Department for Digital, Culture, Media and Sport (DCMS). A significant change was the closure of the BBC Trust as the oversight body, with its responsibilities transferred to the Office of Communications (Ofcom), a government-approved regulatory body. This shift drew criticism due to fears that it might undermine the BBC's independence from political influence. Even with these structural changes, criticism of impartiality persisted in policy discussions and audience feedback as highlighted in its 2024 Mid Term Review (Carrell, 2022; Secretary of State for Culture, Media and Sport, 2024; Waterson, 2022). Currently, both Ofcom, as national regulator, and the BBC Board commission reports on impartiality, analysing audience reception and reviews of relevant news topics, such as taxation and public spending in 2022 and migration coverage in 2024 (Blastland & Dilnot, 2022; Jigsaw Research, 2022b, 2024; Sumption, 2024).

A notable recent controversy involved the suspension of Gary Lineker, the BBC's highest-paid sports commentator, over a tweet criticising the government's migration policy, which led to his early departure from the broadcaster in 2025 (Glynn & McIntosh, 2025). The public backlash regarding his suspension led the BBC to reassess its social media guidelines, which were subsequently updated in September 2023. Impartiality was also a focal point in the 2021 Serota Review, leading to the 2022 Impartiality and Standards Action Plan and amendments to the 2016 Agreement accompanying the BBC Charter. These reforms were further bolstered by thematic reports on impartiality drivers, reviews of taxation, public spending and migration (Blastland & Dilnot, 2022; Jigsaw Research, 2022b, 2022a, 2024; Sumption, 2024). More recently, the BBC Mid-Term Review highlighted ongoing concerns about impartiality, pointing to low audience trust (Secretary of State for Culture, Media and Sport, 2024).

 $<sup>\</sup>frac{1}{2}$  The overview of the relevant documents used for the analysis is available to access on Zenodo, an open online academic data repository, via the following link 10.5281/zenodo.15690749.

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RTÉ's commitment to pluralism and representing diverse viewpoints became central to its strategy in the mid-2000s, coinciding with significant migration trends from rural areas to urban centres and discussions around cultural cohesion (Raats et al., 2022). However, since 2023, RTÉ has faced considerable challenges due to financial scandals involving a lack of transparency around payments and questionable practices. These issues led to internal transformations, including changes to its board and chairperson, and strained relationships with political stakeholders (Newman et al., 2024). The relationship between RTÉ and the Irish political party Sinn Féin remains particularly strained, following a defamation lawsuit filed by its president (Leahy, 2022) and recent calls by the party to review the objectivity of the public broadcaster (Press Association, 2024). Despite these challenges, the Digital News Report confirmed RTÉ as the most-consumed media outlet in Ireland, highlighting its continued cultural significance and commitment to innovation and quality content (Newman et al., 2024).

In Flanders, the 2019 elections witnessed a rise in right-wing votes, fuelling ongoing debates about the perceived bias of legacy media. Critics argued an overemphasis on climate protests and the 'green wave' at the expense of less progressive and less urban perspectives. The strong language of the government agreement was slightly tempered in the Media Policy Letter, which reframed neutrality as a combination of independence, editorial autonomy, and impartiality (Dalle, 2019). The new 2024 government, which includes centre and right parties as well as social-democrats, again places impartiality in its agreement, yet does not call for more stringent regulatory oversight (contrary to the previous government contract) (Vlaamse Regering, 2024, p. 187). This emphasis on impartiality continues efforts initiated in the 2019 government agreement, which called for "the highest standards of neutrality in all programmes and more careful monitoring of that neutrality" (Vlaamse Regering, 2019, p. 135). The public broadcaster VRT faces continuous criticism from Vlaams Belang, a radical-right party, over its perceived lack of balance in reporting (Droeven, 2022; Vlaams Belang, 2023). Oversight of impartiality remains under the remit of the Flemish Regulator for Media (VRM).

While each PSM operates in distinct contexts, we note that common points of criticism related to impartiality emerge, including external pressures from political parties, high audience expectations in the news reporting of the public broadcaster, and the necessity for continuous maintenance of public trust.

# MEDIA REGULATION, MANAGEMENT CONTRACTS AND IMPARTIALITY: ESTABLISHING RELEVANCE, NOT DEFINITION

An analysis of the regulatory obligations across the three preublic broadcasters reveals that impartiality is consistently embedded in all relevant policy documents. However, all of the documents refrain from proposing rigid definitions of the concept. The UK *Communications Act* mentions impartiality explicitly in sections 319 on Ofcom's standards code and 320 on Special impartiality requirements (2003). The Irish *Broadcasting Act* (2009) presents impartiality as a prerequisite of reporting in article 39 on Broadcasters,

Duties, and Regulation. Meanwhile, the Flemish *Media Decree* (2009) distinguishes between impartiality in political and ideological terms in article 39 on General provisions for broadcasters. As such, in Flanders, impartiality is imposed to all broadcasters, whereas specific sections concerning VRT explicitly refer to objectivity, independence, and plurality of opinion-forming (2009, p. 13).

Management contracts and charters further define objectives and obligations related to PSM mandates. In the *BBC Charter* (2016) impartiality is discussed under two separate sections: the BBC's Mission and the Public Purposes. Impartiality is presented as a core aspect of journalistic reporting, together with high-quality, duly accurate, and distinctive output. Its goal is defined as enabling access to news with depth of analysis to "build people's understanding of all parts of the United Kingdom and of the wider world" (2016, section 6(1)). The RTÉ's strategy (2025-2029) discusses impartiality in the section on the goal to: "Engage audiences with high-quality impactful content", underpinning independent journalism and enriching public debates within democracy (RTÉ, 2024a, p. 20). Finally, VRT, in its contract, contextualises impartiality as part of neutrality (VRT, 2020). However, impartiality is also present in other sections of the agreement. For example, in the section on disinformation, filter bubbles, and echo chambers; impartiality is presented as necessary for factual and trustworthy reporting (VRT, 2020, p. 13). It is also interconnected with independence, trust, editorial autonomy, and accuracy in VRT's Strategic Goal 3: Reliable Information as a Common Reference Point (VRT, 2020, p. 26).

Again, in all three cases, impartiality is presented as a prerequisite for PSM's values and remit, yet none of the documents further define the concept. On the one hand, one can allege this opens avenues for discussions on whether or not these public broadcasters fail to uphold impartiality. On the other hand, the lack of definitions in media acts and contracts provides flexibility and autonomy for PSM organisations to define impartiality through internal guidance notes and editorial guidelines. Such an approach fosters adaptability and contextual relevance, enabling PSM to align the interpretation and application of impartiality with their unique operational frameworks and societal responsibilities. Furthermore, management contracts present specific nuances in relevant sections for impartiality, providing insights into its operationalisation in editorial guidelines.

# OPERATIONALISING IMPARTIALITY IN GUIDELINES AND CODES: DIMENSIONS OF IMPARTIALITY

# Dimension One: Impartiality is a Democratic Value Guiding Editorial Choices

Generally, definitions of impartiality provided in editorial guidelines elaborate on both non-partisanship and viewpoint diversity as was also the case in academic literature, albeit with PSM-specific nuances. There is a significant difference between the extensiveness of guidelines across the three cases, with the BBC having the most elaborate set of rules in its editorial guidelines and guidance. Guidelines across all three PSM emphasise the necessity to present diverse perspectives while maintaining independence.

Both RTÉ and the BBC discuss 'due impartiality'. RTÉ's content guidelines indicate that it is fundamental to "provide a breadth and diversity of views, in keeping with the requirements of due impartiality" (RTÉ, 2020, p. 8). The broadcaster explicitly defines aspects to adhere to impartiality such as (i) presenting a diversity of perspectives over time; (ii) taking no stance other than RTÉ's commitment to fundamental democratic rights; (iii) not favouring nor misrepresenting any perspective (RTÉ, 2020, p. 10). The most extensive definition of impartiality can be found in the BBC guidelines and guidance. According to the BBC, "[i]t means reflecting all sides of arguments and not favouring any side" (BBC, 2019, p. 1). The impartiality and editorial standards action plan reiterates that "We cover all sides of the story. [...] our news serves audiences with the facts, the analysis, and the insight they deserve" (BBC, 2021, p. 1). However, impartiality is primarily approached as 'due impartiality', defined as "[...] more than a simple matter of 'balance' between opposing viewpoints. We must be inclusive, considering the broad perspective and ensuring that the existence of a range of views is appropriately reflected" (BBC, 2019, p. 29). Furthermore, guidelines on the personal use of social media reiterate that "The reputation for impartiality is a huge benefit to the BBC, as well as an obligation, and should never be seen as a restriction, or as an inconvenience or anachronism" (BBC, 2023, p. 2). By defining it as such, impartiality is fundamental in guiding news reporting, ensuring sufficient viewpoint diversity.

VRT defines impartiality in the VRT Program Charter as understanding, respecting, and presenting diverse opinions relevant to society (2022, p. 10). The documents generally distance impartiality from neutrality, stating that "Impartiality is not the same as strict neutrality. We may take positions, but we do so in a well-considered, reasoned, fair, open-minded manner, considering the context, timeliness, nature of the subject and its potentially controversial nature" (VRT, 2022, p. 10). This definition of impartiality, together with independence and editorial autonomy, is part of goal 3.1: "VRT adopts a neutral stance in this respect, i.e., impartial, independent and acting from its editorial autonomy" (VRT, 2020, p. 27).

The use of 'due impartiality' and the rejection of strict neutrality present impartiality as a democratic value, guiding editorial decisions towards a balanced and accurate presentation of news.

## Dimension Two: Impartiality Is as Much About Showing Different Viewpoints as It Is About Contextualising Different (and Extreme) Viewpoints

The second lesson drawn from editorial guidelines is its value in contextualising views on the basis of their weight in society. As such, engaging with news from an impartial perspective requires journalists to critically assess and contextualise viewpoints and actors while maintaining a nuanced balance reflective of the subject's complexity. To formalise this critical approach, the guidelines focus on the weight of voices and actors and address the inclusion of extreme viewpoints in a responsible manner, preserving the integrity and credibility of public service journalism.

The BBC states that "Our editorial standards do not require absolute neutrality on every issue or detachment from fundamental democratic principles" (2019, p. 7), and that "In applying due impartiality to news, we give due weight to events, opinion and the main strands of argument" (2019, p. 29). At VRT, guidelines on impartiality define weighing different opinions as "Reality is usually more complex than pro or con, black or white. Make sure there is room for nuance, shading and consideration or outline the weight a particular opinion carries" (VRT, 2015, p. 1). This is also explicitly described in the case of RTÉ: "We seek to maintain a balance of opinion that reflects the weight of the evidence, such as the consensus of contemporary scientific knowledge at the time of the broadcast, where this is relevant" (RTÉ, 2020, p. 8). As such, not all perspectives are equally presented as "Fairness does not necessarily require that all options on a subject are addressed or that differing views receive equal time" (RTÉ, 2020, p. 10).

The importance of proper contextualisation of opinions becomes especially relevant when dealing with radical, alternative, and controversial opinions. In presenting due weight, the BBC editorial guidelines state that "There is no view on any subject which must be excluded as a matter of principle, but we should make reasoned decisions, applying consistent editorial judgement" (2019, p. 46). Furthermore, Ofcom rules stipulate that there is no obligation to present alternative views in all broadcasts and that "There is no requirement on broadcasters to provide an alternative viewpoint in all news stories or all issues in the news. However, when reporting the news, presenters and reporters must take care that they do so with due accuracy and present it with due impartiality" (Ofcom, 2024, p. 7). Similarly, RTÉ specifies that following a scientific consensus "does not exclude alternative views per se. However, we are not obliged to provide a false equivalence" (RTÉ, 2020, p. 8). In addition, in its eighth out of ten 'rules' on impartiality provided to journalists, VRT states that "Extreme opinions should be allowed to be addressed. But then also make it clear that it is an extreme opinion. Give it weight and context" (VRT, 2015, p.1).

Therefore, based on relevant guidelines and codes, we find that all three PSM acknowledge impartiality as a process rather than an outcome. Providing different viewpoints does not imply journalists refraining from providing critical context, and that viewpoints can be 'weighted' depending on their societal value. Yet, at the same time, the analysis shows that guidelines invoke new questions adding to the complexity of day-to-day decisions: "When is an opinion 'extreme' or 'deviant'?", "What adds 'weight'?", and "In which cases is more 'context' required?"

# Dimension Three: Impartiality Is Constructed Across Programmes and Genre

Editorial guidelines are equally as clear in delineating expectations regarding the scope of impartiality. This means that although a story can have different sides, guidelines warn against portraying all viewpoints and actors within one select news programme. News programmes in all three cases include both bulletins and current affairs programmes (BBC, 2019; RTÉ, 2020; VRT, 2012). In all three cases, impartiality is considered desirable within a series of programmes, defined best by the BBC as "pieces of content that deal

with the same or related issues and are editorially linked, within an appropriate period. This may include a strand with a common title; different types of linked programmes" (BBC, 2019, p. 33). The idea of "series of programmes" depends then on the complexity of the topic.

Though the scope of impartiality is consistently acknowledged across all broadcasters, its application varies. VRT and RTÉ only reference impartiality when discussing news (Coimisiún na Meán, 2024; VRT, 2022). However, the BBC guidelines extend the relevance of impartiality to also include drama and entertainment (BBC, 2019, p. 33). The BBC's inclusion of genres beyond news demonstrates a more complex operationalisation of impartiality, viewed as a value to be upheld across the entirety of BBC programming. Limiting impartiality to news is valid, yet at the same time shows their vulnerability to criticism on a perceived bias for cross-over genres or human-interest programmes. In Flanders, in particular, criticism resounded from politicians on a VRT satirical show De Ideale Wereld (The Ideal World) and a one-time documentary series depicting the political and personal life of only one of the political parties' presidents rather than all of them.

As much as news is central to understanding this dimension, defining what constitutes as "news" can still be subject to editorial interpretations. This may lead to conflicting interpretations on the applicability of impartiality, as exemplified by the Ofcom ruling on GB News, which has recently been overturned (Ofcom, 2025).

## Dimension Four: Impartiality Applies Beyond Content, to On-Air Conduct and to Social Media Behaviour

As much as the content itself, impartial presentation of news by editorial staff is paramount for PSM. In our study, we find that impartiality is achieved also through the transparent and fair conduct of editorial staff, extending to freelancers in the case of VRT and RTÉ (RTÉ, 2020, p. 13; VRT, 2012, p. 2). At the BBC, guidance specifies that "All other BBC staff or freelancers are not required to uphold the BBC's impartiality through their actions on social media. They are however required to respect civility in public discourse and must not bring the BBC into disrepute" (BBC, 2023, p. 3).

In detailing the presentation of news, guidelines across case studies expect detachment and fairness by staff. This combination of values is described as key in conveying transparency about the political and economic independence of PSM to their audience. At the VRT presenters must refrain from portraying their views during broadcasts, being aware of their role without losing their authenticity (VRT, 2021). Similarly, Rule 5.4 of Ofcom concerning the BBC, states that "Programmes in the services must exclude all expressions of the views and opinions of the person providing the service on matters of political and industrial controversy and (...) public policy" (Ofcom, 2024, p. 13). RTÉ guidelines stipulate that "If your work specifically requires you to maintain your impartiality, don't express personal opinions on matters of public discussion, contention or debate, or politics" (RTÉ, 2021, p. 4). Guidelines further draw a connection between the behaviour of journalists and the perception of impartiality. For example, RTÉ's third mandatory obligation of

editorial integrity and independence states that "Any interest that could call into question the perceived fairness, objectivity or impartiality of a presenter or employee should be declared to the appropriate editorial manager" (RTÉ, 2020, p. 13). VRT's integrity code encourages staff to "Avoid public statements that undermine confidence in the professional functioning and impartiality of VRT, including on social media" (2021, p. 7).

As such, for all three PSM, impartiality across programmes is only achievable when different viewpoints are paired with detached presentation and fair conduct of editorial staff. This focus on behaviour highlights the critical interplay between journalistic behaviour and the credibility of PSM. However, defining clear practices remains problematic, especially when crucial personalities are also freelancers, as in the case of Gary Lineker at the BBC (Glynn & McIntosh, 2025).

# REGULATORY OVERSIGHT OF IMPARTIALITY: ASSESSING IMPARTIALITY

Monitoring impartiality involves both internal and external mechanisms. Internally, all three PSM have systems for receiving audience complaints about content and other aspects of their remit (BAI, 2011; BBC, 2020; Coimisiún na Meán, 2024; VRT Ombudsdienst, 2024). In each case, audiences must first submit complaints to the broadcaster before escalating them to the monitoring authority (Coimisiún na Meán, 2024; Ofcom, 2017; Van Aelst et al., 2024). At VRT, the Ombudsteam assesses the validity of complaints and reviews internal procedures. Since 2023 there have been two specific complaint reports, one concerning VRT and one concerning VRT NWS, the PSM's news brand (VRT Ombudsdienst, 2024).

Media laws in the cases analysed do not provide explicit definitions of impartiality, but address external monitoring of their respective PSM. In the UK, the *Communications Act* (2003) entrusts Ofcom with monitoring impartiality, alongside presenting standards and guidance notes for the BBC to follow. Specifically, Ofcom's mission is outlined in the *Communications Act*, provisions of part 5 of the 1996 *Broadcasting Act*, and the *BBC Charter* and *Agreement* (2003). An amendment to the *Agreement* (2022) also implements commitments by the BBC Board to oversee and report on editorial guidelines and plans, including those on impartiality. In Ireland, the Coimisiún na Meán monitors impartiality under the *Broadcasting Act* (2009), in combination with drafting broadcasting codes and rules. Its tasks are detailed in the 2022 *Online Safety and Media Regulation Act*, building on previous responsibilities of the Broadcasting Authority of Ireland (BAI) (BAI, 2013; Coimisiún na Meán, 2024). In Flanders, the Flemish Regulator for the Media (VRM) monitors VRT. Although impartiality is not explicitly mentioned in the *Media Decree* (2009), VRM's responsibilities extend to all broadcasters, and a dedicated chamber for impartiality and protection of minors underscores its relevance (2009, p. 121).

In each of these cases, regulators delegate impartiality assessments to independent reviewers. For the BBC, the Board commissioned Jigsaw Research, a private international

analytics firm, to contribute to the 2022 report on drivers of perceptions of 'due impartiality' and audience studies on taxation (2022a, 2022b) as well as the 2024 audience research on migration coverage (Jigsaw Research, 2024; Sumption, 2024). In Flanders, VRM has been delegating reports on impartiality to an independent academic research team since 2021. At RTÉ, impartiality reviews are part of internal performance assessments addressing the goals outlined in its mandate. While impartiality is part of its remit, explicit external studies are lacking. However, RTÉ's annual reports regularly highlight impartiality as an operational risk mitigated through training and complaint processes (RTÉ, 2022, 2024b).

The methodological approaches in impartiality studies are comparable across the three broadcasters. The BBC's most recent thematic review combined audience studies, content analysis, and interviews with journalists and editorial staff (Jigsaw Research, 2024; Sumption, 2024). VRT's latest report focused on content analysis as outlined by VRM (Van Aelst et al., 2024). For instance, the 2024 thematic reviews at the BBC built on the recommendations by the Serota Review (Serota et al., 2021) and subsequent *Impartiality and Standards Action Plan* (BBC, 2021) as well as previous reports (Blastland & Dilnot, 2022; Jigsaw Research, 2022b). They assessed impartiality in content and internal structures through mixed methods to meet their objectives as set out by the BBC Board. By contrast, VRT's review included a comprehensive reporting on actors and themes in VRT's main news bulletin compared to VTM's 7 pm news; an analysis of actors and themes in VRT's current affairs programmes; and a detailed coding of three case studies on various platforms beyond VRT itself (Van Aelst et al., 2024).

The regulatory oversight shows preference for measurable and comparable assessments, often by comparing mentions of actors or minutes of attention; existing assessments also show the difficulties of grasping complexity and nuance, as research fails to capture the contexts in which viewpoints were presented. The research also shows the clear preference for examining political impartiality, over, for example, viewpoint diversity within economic, religious and cultural actors.

Table 1. Overview of Impartiality Across Levels of Analysis.

BBC	RTÉ	VRT
Levels		
Regulation		
The Communications Act (2003) and the BBC Charter (2016) establish impartiality as a fundamental value, without a strict definition. Ofcom and BBC Board are responsible for its oversight.	The Broadcasting Act (2009) and Online Safety and Media Regulation Act (2022) establish impartiality as a reporting requirement. The Coimisiún na Meán oversees RTÉ's adherence to these principles.	The Flemish Media Decree (2009) mandates impartiality for all broadcasters without strict definition. The Flemish Regulator for the Media (VRM) oversees compliance, and the government contract reinforces it as an objective.



Policy Context		
Impartiality is a recurring issue, with reviews highlighting audience trust concerns and high-profile controversies contributing to policy updates.	RTÉ has faced scrutiny due to financial scandals and perceived bias in political coverage, which influences discussions on impartiality.	Impartiality is a politically sensitive issue amid criticism from extreme right-wing parties. Government agreements further highlighting impartiality as core element of its public remit.
Editorial Guidelines		
'Due impartiality,' ensures an accurate presentation of viewpoints including journalists' (social) media conduct. It includes entertainment and drama beyond news.	Impartiality is framed as 'due impartiality', avoiding false equivalence and journalists' (social) media conduct.	VRT distinguishes impartiality from neutrality, emphasising fair positioning. Impartiality is primarily relevant for news, and journalists' (social) media conduct.
Regulatory Oversight		
Impartiality is assessed through external reviews. These employ a combination of qualitative and quantitative methods.	Impartiality reviews are largely internal, highlighting impartiality as an operational risk.	Independent academic studies are employed to assess impartiality through content analyses comparing VRT's news coverage to private broadcasters.

Source: Authors.

## DISCUSSION AND CONCLUSIONS

This research set out to answer three core research questions on how impartiality is defined and operationalised, by identifying its core dimensions according to editorial guidelines, and how it is monitored at the BBC, RTÉ and VRT. First, our findings support the conceptualisation of impartiality as a combination of non-partisanship and viewpoint diversity. Across policy documents, editorial guidelines, and regulatory oversight, impartiality is formalised as a safeguard for balancing viewpoints and maintaining a non-partisan approach among presenters and journalists. At the policy level, we observed that legal acts and management contracts avoid defining impartiality rigidly, instead emphasising its relevance for the news remit of individual PSM. Arguably, this is a sound approach, as it allows impartiality to be an editorially defined concept, avoiding top-down operationalisations and consequent restrictions on the independence and autonomy of PSM.

Second, dimensions of impartiality are prominently featured in editorial codes and guidelines concerning news presentation and journalistic behaviour, both on-air and

on social media. From these findings, we derive four lessons highlighting the value of impartiality. First, impartiality serves as a democratic value guiding editorial choices, requiring balance and non-partisanship to inform decisions. Second, impartiality supports critical journalism by contextualising viewpoints according to their societal weight and responsibly including extreme voices to ensure credibility and accountability. Third, it functions as a thread across series of programmes, providing a comprehensive overview of relevant topics. Fourth, impartiality extends beyond content, encompassing the behaviour of journalists and editorial staff, which directly influences public perceptions of credibility and trustworthiness. These findings underscore the multifaceted nature of impartiality and its critical role in sustaining the legitimacy, independence, and adaptability of PSM across Europe. Finally, monitoring reports are inherently dependent on the scope provided by the commissioning agencies, as well as the time and means at the disposal of researchers involved. These are complemented by internal complaint systems allowing audiences to directly address PSM newsrooms.

Furthermore, definitions, dimensions and reports underscore potential discrepancies between expectations and audience perceptions of dimensions of impartiality and issues with monitoring. For example, even when guidelines are clear in delineating news as central to impartiality, PSM audiences may not necessarily make the same distinction and are more likely to be critical of all programming including and beyond news items. Similarly, attitudes of journalists on social media can be subject to audience interpretation, thus becoming a source of criticism.

Our findings lead to two fundamental recommendations for European policy. First, strict definitions of impartiality should be avoided. Top-down definitions risk being contextualised differently across nations, depending on power dynamics between governments and public broadcasters. Instead, PSM should retain the freedom to define impartiality within their internal guidelines, supported by European policy frameworks that reinforce its value as a democratic principle. Second, policy efforts should focus on creating frameworks that facilitate knowledge exchange among PSM across Europe. Platforms for sharing guidelines on independence, editorial freedom, and impartiality would enable PSM to collaboratively address shared challenges and enhance resilience.

Due to this inherent complexity and ambiguous definitions – such as the accurate evaluation of the weight of viewpoints or the appropriate timeframe concerning series of programmes – a holistic approach to regulatory oversight remains difficult to obtain. However, we found that the more complex the research methodology, the better the knowledge on impartiality within PSM. Future studies should examine how impartiality is constructed within PSM newsrooms and explore the extent to which regulatory frameworks influence daily journalistic practices. Additionally, research should continue investigating the evolution of impartiality in media policy, with a focus on comparative case study methodologies, highlighting rulings and operationalisations of existing guidelines.

In essence, while limited definitions and conceptual ambiguity surrounding impartiality can benefit editorial autonomy, an increasing political emphasis on impartiality paradoxically risks undermining the editorial independence it seeks to protect. This tension is further compounded by the unrealistic expectation that a perfect state of impartiality can be achieved, given the many contextual factors that shape news reporting. As such, our research should be embedded in the necessity of a fundamental repositioning of PSM in an ever-changing and challenging digital media landscape characterised by decreased funding and growing distrust in legacy media.

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## **DEFINIRANJE NEPRISTRANOSTI U EUROPSKIM JAVNIM MEDIJSKIM SERVISIMA:** USPOREDNA ANALIZA BBC-JA, RTÉ-A I VRT-A

SAŽETAK Usred sve izraženijih kritika i političkog nadzora definiranje i operacionalizacija nepristranosti postali su ključno pitanje za javne medije. Ovo istraživanje analizira kako se nepristranost konceptualizira kroz politike, uredničke smjernice i regulatorni nadzor u trima zapadnoeuropskim medijskim sustavima, i to putem komparativne analize dokumenata BBC-ja (Ujedinjeno Kraljevstvo), VRT-a (Flandrija, Belgija) i RTÉ-a (Irska). Članak pokazuje, prvo, da iako regulatorne obveze nameću potrebu za "nepristranošću", jasne definicije u strateškim dokumentima često nedostaju; drugo, uredničke smjernice sugeriraju da se nepristranost treba promatrati kao proces, a ne kao mjerljivo i ostvarivo stanje novinarskog djelovanja. Konačno, članak ističe sve veću važnost mehanizama za podnošenje pritužbi i uloge "vratara" (engl. gatekeepers) koji se bave pitanjima nepristranosti i percepcije publike. Istodobno se pokazuje da postojeće evaluacije ne uspijevaju u potpunosti obuhvatiti složenost toga pojma, što doprinosi percepciji da se nepristranost može jednoznačno ostvariti u novinarskom izvještavanju.

## **KLJUČNE RIJEČI**

JAVNI MEDIJI, NEPRISTRANOST, NEZAVISNOST, URAVNOTEŽENOST, RAZLIČITOST POGLEDA, ANALIZA JAVNIH POLITIKA

Bilješka o autorima\_

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