

Invitation to comment title: Public Interest Test on the Potential Merger Situation in Relation to  
Telegraph Media Group

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Confidentiality: Nothing

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Name: Julian Petley.



## **Comment on Behalf of CPBF North on the Proposed Acquisition by Daily Mail and General Trust plc of Telegraph Media Group Holdings Limited**

This response to Ofcom's invitation to comment on the potential merger situation arising from the proposed acquisition by Daily Mail and General Trust plc of Telegraph Media Group Holdings Limited is from CPBF North, which is the successor body to the Campaign for Press and Broadcasting Freedom (CPBF). This was established in 1979 and for over three decades worked for more accountable and diverse media. One of its main concerns was the degree of concentrated ownership of the national press in Britain and its over-representation of right-wing views compared to their presence in the population as a whole. This remains a central concern of CPBF North.

This submission is written on behalf of CPBF North by Julian Petley, honorary and emeritus professor of journalism at Brunel University London, a former chair of the CPBF and a member of the editorial board of *British Journalism Review*.

**1.1.** Under the heading **Plurality of Views**, which is the aspect of Ofcom's invitation to comment on which we wish to concentrate, Ofcom asks respondents to consider the bid by Daily Mail and General Trust plc (DMGT) for Telegraph Media Group Holdings Limited (TMG) in relation to availability, consumption, impact and contextual factors. This we do in turn below.

**2.1. Availability** relates to the number of news providers in a particular section of the media market (in this instance, the national press, both online and in print). Below we present a table which lists the number of national daily news titles available in 2025, and their circulation and political partisanship at the time of the general elections of 2019 and 2024.

<b>Title</b>	<b>Partisanship 2024 (2019)</b>	<b>Circulation in 000s 2024 (2019)</b>
<i>Daily Mirror</i>	Very strong Labour (Strong Labour)	224 (455)
<i>Daily Express</i>	Strong Conservative (Very strong Conservative)	138 (298)
<i>Daily Star</i>	Moderate Labour (None)	126 (289)
<i>The Sun</i>	Weak Labour (Very strong Conservative)	700* (1,217)
<i>Daily Mail</i>	Strong Conservative (Very strong Conservative)	685 (1,133)
<i>Daily Telegraph</i>	Strong Conservative (Very strong Conservative)	190* (309)
<i>The Guardian</i>	Moderate Labour (Weak Labour)	60* (129)
<i>The Times</i>	None (Strong Conservative)	180* (365)
<i>The i</i>	None (None)	126 (220)
<i>Financial Times</i>	Weak Labour (Very weak Liberal Democrat)	109 (163)

Source: *The British General Election of 2024* (Palgrave Macmillan 2025). Circulation figures are sourced from ABC, except those marked with an asterisk which are estimated by *Press Gazette* in the case of titles which have either withdrawn from the ABC or no longer publish ABC figures. The figures for the Sunday editions exhibit a very similar pattern.

The share of endorsements by circulation percentages for the 2024 election are: Conservative 40%, Labour 48%, Liberal-Democrat 0% and none 12%. For 2019 the figures are: Conservative 72%, Labour 13%, Liberal Democrats 4% and none 11%.

**2.2.** What these figures conclusively demonstrate is the overwhelming dominance of right-wing views in the ten daily newspapers which are available nationally. It should be pointed out that the

picture of press partisanship in 2024 is an aberration, due to the unpopularity of the Conservative government rather than to any enthusiasm for Labour on the part of sections of the press (which is why, below, we deal with the more typical situation found in 2019). Of course, right-wing papers habitually claim that the views that they promulgate represent ‘public opinion’ and that that is why they are popular, but nothing could be further from the truth. Firstly, their circulations are falling, and have been doing so for decades, as is the case with all national titles. Second, research shows that right-wing newspapers do not even represent the political preferences of all of their readers. And third, at the 2019 general election the Conservative share of the vote was 46%, Labour 32.1% and the Liberal Democrats 11.5%. Yet, as noted above, in the national daily press Conservative-supporting papers accounted for 72% of circulation, Labour-supporting papers for 13% and Liberal Democrat supporting papers for 4%. Furthermore, the number of readers of Conservative-supporting daily papers (3,322,000) accounted for only 10.4% of those who voted (32,014,010) and 7% of the total number of registered voters (47,562,702).

**2.3.** What even this quite limited exercise demonstrates is that even though ten newspaper *titles* are available on a daily basis, the range of *political views* available is distinctly limited (note not only the severe under-representation of the Liberal Democrats but the complete absence of the Greens) and heavily skewed to the right. In its *Measurement Framework for Media Plurality* (2015) Ofcom states that ‘plurality in media contributes to a well-functioning democratic society through informed citizens who are able to access and consume a wide range of viewpoints across a variety of platforms and media owners; and preventing too much influence over the political process being exercised by any one media owner’. In our view, plurality is vitally important in *every* media sector, and lack of it in one sector (in this case, the national daily press) cannot legitimately be offset by its presence elsewhere (for example, in broadcasting or in magazine publishing). Furthermore, were the DGMT allowed to take over the *Daily* and *Sunday Telegraph*

this would manifestly obviously increase the amount of influence which the Rothermere family currently exercise over the political process, which is already very considerable (as we discuss at the end of this submission).

**2.4. Given the lack of availability in the national daily press sector of a sufficient variety of news providers with a sufficient variety of political views, we strongly recommend that the DMGT bid is rejected.**

**3.1. Consumption** refers to the number of people using news sources and the extent to which they do so. The situation regarding the matter of consumption has been very clearly laid out on pages three and four of the letters sent to DMGT and TMG by the Department for Culture, Media & Sport (DCMS) on 20 January 2026. As we fully agree with those findings we will not repeat them here but simply endorse them. However, in addition it is worth stressing that the DCMS notes that the ABC monthly circulation figures for 2024 given in the letters are ‘supplemented with additional information provided by publishers upon request by DCMS’. This presumably relates to the *Telegraph* ABC figures which, as mentioned earlier, are no longer made available to the general public (although, of course, the papers still insist on demanding openness and accountability from all the other institutions covered in their pages).

**3.2.** We would like to take this opportunity, however, to put the figures provided by the DCMS into a wider context, echoing the concerns of the Media Reform Coalition (of which we are a member) that:

Just three companies – DMGT, News UK and Reach – control 90% of UK national newspaper circulation, a 20% increase in market concentration since 2014. These same three companies account for over 40% of the combined reach of the UK’s top 50 online news brands, giving these publishers significant power to set and steer the national news agenda. DMG Media alone controls more than two-fifths of combined weekly circulation.

But whilst the market shares of News UK and Reach have declined, albeit slightly, over the past decade, ‘DMGT’s share of combined weekly circulation has doubled since 2014. With the possibility of DMGT acquiring the TMG titles, the UK’s national newspaper market is perilously close to being majority-controlled by a single publisher’. ([\*Who Owns the UK Media? 2025 Report\*](#)).

**3.3.** In the matter of news consumption, Ofcom rightly stresses the increasingly important role played by digital intermediaries (search engines, social media and news aggregators) and argues that metrics capable of quantifying cross-media news consumption are particularly important in this context. We would strongly agree.

**3.4.** In its *Measurement Framework for Media Plurality* (2015), Ofcom explains that it employs a ‘share of references’ to news sources on different media as a metric for measuring cross-media news consumption. This is calculated by asking people which news sources they use and how often they do so. Each mention is counted separately and the figures are aggregated, culminating in a share for each news provider expressed as a proportion of all references for all news sources. Share of reference data is then used to provide a sense of how large an influence a particular company may have over the total news market.

**3.5.** Ofcom itself admits that such a metric has its drawbacks. For example, respondents may over- or under-estimate the number of sources they’ve used or the time they’ve spent using them. Or they may simply be unaware of the identity of some of the sources used – for example, the Ofcom discussion document *Media Plurality and Online News* (2022) notes that an Ofcom survey revealed that around half of those who visited the BBC News website did not actually mention the BBC as one of the sources they visited. Equally, given the increasingly opaque and mystificatory nature of the online world, users may be unaware of the extent to which they may

be propelled towards certain sources (and shielded from others) without having any knowledge of what is actually going on. As Ofcom's *Online News: Research Update* (2024) put it:

People still have limited understanding of how online intermediaries, in particular social media, can affect the news they are shown, and that they have a limited ability to control what news is shown to them ... Although audiences value the range of news content that they have access to online, they are often unaware of why certain stories are served to them or the degree of personalisation over news content that is possible.

**3.6.** Putting this issue in the context of the current bid, it is surely crucial that in its thinking on the news consumption aspect of the public interest test, Ofcom attempts to ascertain the extent to which news items on search engines, social media and news aggregators derive, whether openly acknowledged or not, from the *Daily Mail*, *Mail on Sunday* and *MailOnline*. Tabloid newspapers, notoriously, are increasingly reliant on clickbait (and indeed rage bait) to generate revenue, and the *Mail* titles are certainly no exception. Our concern, in the present context, is on (a) the power of those titles to bounce their stories into the online world via intermediaries of one kind or another; and (b) the extent to which people accessing these stories via online intermediaries are aware of their actual journalistic origins. In our view, a takeover by DGMT of the *Telegraph* titles would only intensify these problems, given the sheer financial and algorithmic power that the combined operation would be able to exercise in the online world, which isn't exactly short of behemoths already.

**3.7. In our view, the picture which the DCMS letter paints of the current market shares of the DGMT and TMG titles means that any takeover of the latter by the former would represent an entirely unacceptable consolidation of reach in this media sector.**

**Furthermore, we do not believe that Ofcom's 'share of references' metric is capable of measuring accurately the extent to which online readers are consuming news that emanates**

**from DGMT titles via intermediaries of one kind or another, and thus the metric may seriously underestimate the online reach of its news stories. For these reasons we strongly recommend that the DMGT bid is rejected.**

**4.1. Impact** metrics, Ofcom explains, help inform how news content can influence the formation of people's opinions. It admits that measuring influence is complicated (something of an understatement), and suggests using proxies for impact. These include 'personal importance, impartiality, reliability, trust and the extent to which a news source helps people make up their minds about issues in the news'.

**4.2.** As there is no onus on newspapers to be impartial, there is no point in discussing this proxy in the present context. Instead we will concentrate here on trust, which also largely encompasses reliability, personal importance and helping readers to make up their minds about issues in the news.

**4.3.** The picture here is a bleak one for the national press as a whole, and for the *Mail* titles in particular. [Highly reputable surveys](#) by organisations such as Eurobarometer and the European Broadcasting Union have repeatedly shown that Britons trust their national press far less than the citizens of other European countries trust theirs, and in the most recent [World Values Survey](#) carried out by the Policy Institute at King's College London, the UK press came next to last in terms of trustworthiness on a geographically far wider scale.

**4.4.** However, such studies, though significant, tell us little about degrees of trust in individual newspapers in particular countries. But when it is actually possible to locate survey information about specific papers, neither the *Mail* nor *Telegraph* titles are revealed in a remotely positive light. Thus according to a [YouGov report](#) in 2023 only 8% of respondents regarded the *Mail* as trustworthy whilst 47% thought it untrustworthy. The equivalent figures for the *Telegraph* were 22% and 24% respectively. (The other respondents were either 'don't know' or neutral in their

judgement). In terms of net scores on trust (that is, the number of people who trust a media organisation minus the number of people who distrust it), the *Telegraph* scored 0 – the lowest score among the non-tabloid titles – and the *Dail Mail* -37. More recently, the [Reuters Institute Digital News Report 2025](#) found that while 24% of respondents trusted the *Mail*, 49% did not do so. In the case of the *Telegraph*, 42% trusted it and 25% did not. Thus we were particularly amused to note that in its [reply](#) to the DCMS, DMGT stated that the growing number of online sources means that ‘trusted news organisations will play an ever more critical role, and that requires publishers with the resources and experience to compete’. (‘Trusted news organisations’ was a term cynically invented by the newspaper industry in order to exempt it from the ambit of the Online Safety Act 2023).

**4.5. If Ofcom regards trust as a significant proxy for impact we would argue that it would be highly inadvisable to allow a news organisation whose papers score so poorly on trustworthiness to take over a news organisation whose papers have a higher score on trust, according to two highly reputable sources.**

**4.6.** We would also like to suggest a different way in which impact should be measured, moving away from the ‘effects’ of news sources on people’s views and opinions which, as Ofcom admits, are difficult to judge, to consideration of the role which newspapers play in setting the media agenda, as well as wider public and policy agendas. As Ofcom itself noted of newspapers in *Measuring Media Plurality* (2012):

Their ability to be *partial*, combined with the power of the written word (and headlines in particular) gives this medium in our view significant impact and influence. Historically newspapers have also played a role in setting the day’s agenda for other media to draw from and they are – and are likely to remain in some form – a crucial component of the symbiotic relationship between the different mediums in the news value chain.

**4.7.** The notion of agenda setting is long-established and widely accepted within media and journalism studies, and is particularly useful when it comes to examining the extent to which the news agenda of one particular medium impacts on that of another, as well as on wider agendas. Such concerns have also moved outside the boundaries of academia in Britain in recent years with authoritative claims that the news agenda of the right-wing press is increasingly setting that of the BBC in particular. As Professor Steven Barnett put it in a [presentation](#) to the Westminster Media Forum:

Rigorous research is lacking, but there is plenty of anecdotal evidence that our national press plays a hugely important role in driving news agendas. Broadcast newsrooms are usually immersed in mountains of newsprint, and informal conversations with BBC journalists reveal a high level of editorial anxiety when bulletins are not covering a story which has featured prominently in the press. Then there are the numerous newspaper reviews.

We would also draw attention to the [heavy representation](#) of panellists from the right-wing press on programmes such as *Question Time*.

**4.8.** The reason why such considerations are particularly relevant in the present context is that the *Mail* and *Telegraph* titles are already the loudest – and many would claim the most influential – voices in the right-wing national press (and have repeatedly attacked the BBC for not following their own front-page agendas in their news programmes). The proposed merger would undoubtedly have the effect of unifying these two voices into one stentorian roar which it would take considerable willpower to resist, not simply on the part of the BBC but also a government which is clearly terrified of right-wing newspapers and all too willing to bow to their demands – one of the main causes of its considerable number of U-turns since coming to power. (We should also note here that there is a considerable gulf between the notion of

newspapers acting as watchdogs in the public interest and as attack dogs acting on behalf of narrow sectoral interests).

**4.9.** In its letters to DMGT and TMG the DCMS notes that the *Daily Mail* and *Telegraph* have ‘overlapping editorial positions on numerous issues, however they remain distinctive voices and target different audiences within the right-leaning spectrum. The *Daily Mail* and the *Telegraph* have differing focuses and approaches, related to their positions as tabloid and broadsheet papers respectively’. In our view this is not a convincing argument against the merger, and we would urge Ofcom not to lay too much store by it in reaching its conclusion. As the veteran media commentator Raymond Snoddy pointed out in [The Media Leader](#), 18 February 2026:

‘Obviously, the *Mail* is a mid-market tabloid compared to the broadsheet, in every sense. [But] although the *Mail* scores much more highly on the shrill and unashamedly biased index than *The Telegraph*, on major issues, it is difficult to tell them apart ... Mostly, the papers are separated by tone of voice rather than substance’. Similarly Robert Shrimpsley in the [Financial Times](#), 29 November 2025, described the *Telegraph* as ‘once a bastion of serious if somewhat crusty journalism’ which ‘now too often descends into shrill populist paranoia and heated anti-immigrant rhetoric’. Not for nothing did *Private Eye* long call the paper the *Maily Telegraph* (that is, before habitually referring to it as a ‘former newspaper’). One might also consider the number of senior staff who have moved between the titles, including Quentin Letts, Simon Heffer, James Chapman, Neil Darbyshire and particularly Tony Gallagher (head of news at the *Mail*, then *Telegraph* editor, then back to the *Mail* as joint deputy editor).

**4.10.** As at **4.8.** above, we would again stress here the importance of considering above all the political and ideological *power* that a combined *Mail/Telegraph* behemoth would exercise – not simply in the newspaper market but in the wider media market and indeed in the political arena. This is a matter of particular concern at the present moment when both the *Mail* and *Telegraph*

titles are showing very distinct signs of shifting their political allegiances from the hard right of the Tory Party to the populist radical-right Reform UK. (We noted with further amusement that DMGT [claimed](#) that the term ‘right-wing’ is vague when applied to its titles, so we have been careful to be more precise here). In this context it is highly significant that Lady Rothermere recently donated £50,000 to Reform and that Nigel Farage is paid £4,000 monthly for *Telegraph* columns which are nothing more than propaganda for his party. Add to this the quite remarkable leeway that Ofcom has granted to GB News as far as ‘due impartiality’ is concerned, with the result that parts of its schedule have become effectively party political broadcasts for Reform, and it is clear that we have entered a new era in terms of political representation in the media, and indeed a new era in UK politics in general. In this situation, rigorously critical scrutiny of the current bid on behalf of the public interest is absolutely vital.

**4.11. We would very strongly argue that it is *this* kind of impact on which Ofcom should focus when considering the current bid, and that it should reject it on the grounds that it grants far too much political and ideological power to a media organisation (DMGT) which, we would argue, already possesses an excessive amount of it and exercises it in a fashion that does not, to use Ofcom’s own terms, ‘contribute to a well-functioning democratic society’.**

**5.1. Contextual factors.** According to Ofcom’s *Measurement Framework for Media Plurality* (2015), this aspect of gauging media plurality involves examining ‘important differences between news organisations and news sources’, particularly regarding their ‘operating environments’. However, we cannot see any major differences between the governance models of each organisation: DMGT is a private media conglomerate owned and controlled by the Rothermere family, and although TMG’s ownership is obviously in transition, with RedBird Capital Partners appearing to be the controlling owner, both are profit-driven enterprises and in

that sense there is very little significant difference between them. From what we know of the two companies, editorial control operates in a highly top-down manner and internal plurality is not exactly high on the agenda. Certainly the hostility to organised labour expressed in the articles published in their newspapers is replicated in the attitude to trade unions in their own organisations. Finally, in terms of regulation and oversight, both are members of the utterly ineffectual and compromised Independent Press Standards Organisation.

**6.1. For all the reasons outlined above, CPBF North strongly urges Ofcom to recommend that the DCMS reject the DMGT bid for TMG on the grounds that it would be highly damaging to the public interest if it were allowed to succeed.**