



# Materiality 2025

# Media

Collaborative research into the topics which are strategically important and relevant to the media sector.



# Contents

Executive Summary	3
Introduction	4
Materiality	4
Why we refreshed media materiality in 2025	5
Building on previous RMF materiality assessments	6
How does a DMA work?	7
Methodology	8
<b>Summary of findings</b>	<b>10</b>
2025 Material Topics	12
<b>Sector-specific</b>	<b>12</b>
Content	12
Digital Transition	15
Social Impact	17
<b>Environmental</b>	<b>18</b>
Climate change adaptation	18
Climate change mitigation	19
Circular economy and waste	21
<b>Social</b>	<b>22</b>
Own workforce	22
Supply chain	25
Consumers	27
Responsible marketing	29
<b>Governance</b>	<b>30</b>
Data	30
Governance	31
<b>Conclusion</b>	<b>32</b>
<b>Appendix A</b>	<b>33</b>

## Media Materiality 2025

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Established formally in 2003, the Responsible Media Forum (RMF) is a partnership between 21 media companies to identify and act on the social and environmental challenges facing the sector. Having started as a UK initiative, participants now come from all over the world covering the sector in all its diversity. One key principle of our work is the idea that media has a unique responsibility issue through the content it produces, which sets it apart from most other sectors. The Responsible Media Forum is a multi-client project run by SLR Consulting Ltd.

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# Executive Summary

## Overview

This report aims to summarise the sustainability topics which may be materially important to the media industry, based on research that the Responsible Media Forum (RMF) conducted in 2025. It builds upon the five materiality reports published by the RMF since 2005.

## Materiality Assessments

Materiality assessments are a key method used by businesses to identify which sustainability topics to prioritise. The method has evolved over the years; this report was inspired by the more recent concept of a Double Materiality Assessment (DMA), which explicitly defines how companies should consider a topic through both an impact and a financial lens – the financial risks and opportunities it poses, and the impact the business may have on people and the planet. Larger businesses are increasingly adopting the DMA method for sustainability reporting: the S&P Global Corporate Sustainability Assessment (2025) found around half (48%) of analysed companies which disclose their materiality assessment process based it on double materiality.<sup>1</sup> This shift is largely driven by the European Union's (EU's) Corporate Sustainability Reporting Directive (CSRD), which introduced the requirement for EU businesses that meet the threshold to undertake DMAs as part of their sustainability reporting.

## The Challenge

The EU European Financial Reporting Advisory Group's (EFRAG) reporting standards and implementation guidance are designed to be generally applicable and are therefore sector-agnostic (as are most global sustainability reporting standards).<sup>2,3</sup> Consequently, the media sector has a challenge: how to identify and consider material topics which may be unique to media (i.e., sector-specific). A RMF working group convened around this question, with the intention to build on previous RMF materiality assessments and to provide a useful springboard for media companies conducting their own materiality assessments.

## The Findings

Since the RMF's previous materiality report in 2022, both media and sustainability have evolved significantly, whether through legislation, politics or technology. However, one finding has remained consistent: **Content**<sup>4</sup> is media's most material topic and its superpower. This year, **Content** was analysed at a more granular level, by introducing **Diverse content** as a standalone sub-topic, and further developing the sub-topics of **Freedom of expression** and **Responsible content**. Unsurprisingly, the **Digital transition** and **AI** emerged as priority topics, with trust in the media an increasing concern. Emphasis was placed on the need for strong governance of AI, which will be a priority topic for the RMF in 2026.

Environmental topics remain consistent with previous reports but continue to mature. This report touches on the well-established topic of climate adaptation, and delves into climate mitigation in greater detail, including the topical notions of **Advertising Emissions, Advertised Emissions and Serviced Emissions**.

There are four social topics that have shifted with the wider landscape: Own workforce, Supply chain, Consumers and Responsible marketing. Sub-topics which directly impact employees remain a priority for organisations, particularly **Health, safety and wellbeing** and **Diversity, Equity and Inclusion (DEI)**, with many remaining committed to DEI despite rollbacks in the US. The sub-topics of **Product and consumer safety**, and **Accessibility** were further developed from 2022's report. Specifically, the responsibility to protect consumers from harmful content and the consideration of how accessibility intersects with digital poverty and exclusion in a rapidly transitioning market.

Governance processes are well-established in most organisations as 'good business hygiene'. **Data privacy** and **Cybersecurity** remain critical to risk management, and one new topic emerged: **Responsible supplier and corporate partner management**.

We hope that this document is a useful tool for media companies to understand which topics might be relevant, whether they are preparing their own materiality assessments, developing their sustainability strategy, drafting sustainability disclosures, or a combination of the above.

1 S&P Global, *The state of double materiality in corporate reporting*, February 2025, <https://www.spglobal.com/sustainable1/en/insights/special-editorial/double-materiality-is-gaining-traction-in-corporate-reporting>.

2 EFRAG, *Draft Simplified ESRS*, November 2025, <https://www.efrag.org/en/draft-simplified-esrs>.

3 EFRAG, *ESRS implementation guidance documents*, May 2024, <https://www.efrag.org/en/projects/esrs-implementation-guidance-documents>.

4 Sustainability topics that have been analysed are highlighted in bold throughout this report.

# Introduction



## Materiality

Materiality assessments refer to the methodologies by which companies identify the sustainability topics that are relevant to their business and which they need to strategically prioritise. Material topics “represent an organization’s most significant impacts on the economy, environment, and people, including impacts on their human rights”.<sup>5</sup> Naturally, these assessments have formed important starting points for strategy designs or refreshes and for reporting and disclosure.

As a concept, materiality assessments have existed since the early 2000s and have evolved from a financial accounting concept into a core exercise for stakeholder engagement and decision making. An assessment looks at a range of sustainability topics that are relevant to the business, and through a process of qualitative engagement and analysis (and sometimes financial quantification), it draws out the topics which are likely to have the greatest impact (i.e., those which are ‘material’). Often, companies will refer to impact through the lenses of ‘importance to stakeholders’ and ‘importance to the business’.

In recent years, the concept of ‘double materiality assessments’ (DMAs) formally entered the sustainability landscape and is increasingly the preferred approach for large companies: the S&P Global Corporate Sustainability Assessment (2025) found around half (48%) of analysed companies which disclose their materiality assessment process based it on double materiality.<sup>1</sup> This shift is largely driven by the European Union’s (EU’s) Corporate Sustainability Reporting Directive (CSRD), which introduced the requirement for EU businesses that meet the threshold to undertake DMAs as part of their sustainability reporting.<sup>2,3</sup> DMAs have two dimensions to them (hence ‘double’ materiality): impact materiality and financial materiality. Financial materiality is very similar to the previous approach to materiality assessments, and generally asks companies to assess the importance of that topic to the business and to its stakeholders. Impact materiality is a slightly newer idea, and explicitly asks companies to also consider the business’s impact on the topic.

# 48%

of analysed companies which disclose their materiality assessment process based it on double materiality

# Why we refreshed media materiality in 2025

The DMA approach has been established over the last few years. This is largely driven by the requirements for disclosure preparation under the EU's Corporate Sustainability Reporting Directive (CSRD), as well as the general standardisation of voluntary frameworks, such as the Global Reporting Initiative (GRI) and the Sustainability Accounting Standards Board (SASB). This evolving disclosure landscape has pushed DMAs to the forefront, and reporting and disclosure has been a key focus and deliverable for many companies – including the media sector – since 2023.



In late 2024, a new RMF working group formed around this challenge and set out to research which topics might be material to the media industry (i.e., sector-specific) and which are not covered by the guidance.

However, whilst there are now guidance documents and standards that cover DMAs, such as the EFRAG DMA implementation guidance and accompanying reporting standards, these are largely sector-agnostic and generalised, and therefore stark gaps remain.<sup>2,3</sup> As a result, many sectors are trying to interpret and apply this general guidance to their unique business models, supply chains and products and services.

In late 2024, a new RMF working group formed around this challenge and set out to research which topics might be material to the media industry (i.e., sector-specific) and which are not covered by the guidance. The plan was to conduct the research through the structure of a DMA and to build on the previous materiality work done by the RMF, most recently published in 2022.<sup>6</sup>

Whilst the EFRAG guidance provided a starting point, the research is intended to be relevant to companies globally, not just within the European Union, as the RMF is made up of media companies from around the globe, including non-EU countries in Western and Central Europe, and South America.

This is not a definitive assessment on what is material to the media industry; it is the output of considered research and collaborative discussion. We hope it acts as a springboard for ideas and discussion within companies as they consider which topics might be material to their business for strategy or disclosure.

<sup>6</sup> Daniel Witte, Valentina Okolo and Rosie Towe, *Media Materiality 2022: The Material Issues for the Media Sector, 2022*, <https://responsiblemediaforum.org/downloadDocumentFile?document=359>.

# Building on previous RMF materiality assessments

Since 2004, the RMF has regularly identified material issues for the media sector, with the last report published in 2022.<sup>6</sup> This latest report builds on this history of reporting research and support:

**2005**



The RMF's first materiality assessment in partnership with KPMG. Over 130 stakeholders across media, the Corporate Social Responsibility (CSR) community, socially responsible investors, and external ratings agencies contributed to this work.

**2008**



The original assessment was revised and four new issues introduced: Climate Change, Staff Diversity, Responsible Advertising, and the Awareness of the Impacts of Communication. Freedom of Expression was also highlighted as a priority issue.

**2013**



The list was updated based on insights from the 2008 report and a 2012 research study by the European Sustainable Investment Forum. Issues were grouped for the first time into 'material', 'strategic', and 'operational' bands.

**2018**



Three new headings were introduced: 'new on the radar'; 'growing in importance'; and 'decreasing in importance'. Net Neutrality and Disinformation (Fake News) were added to the list of material issues.

**2022**

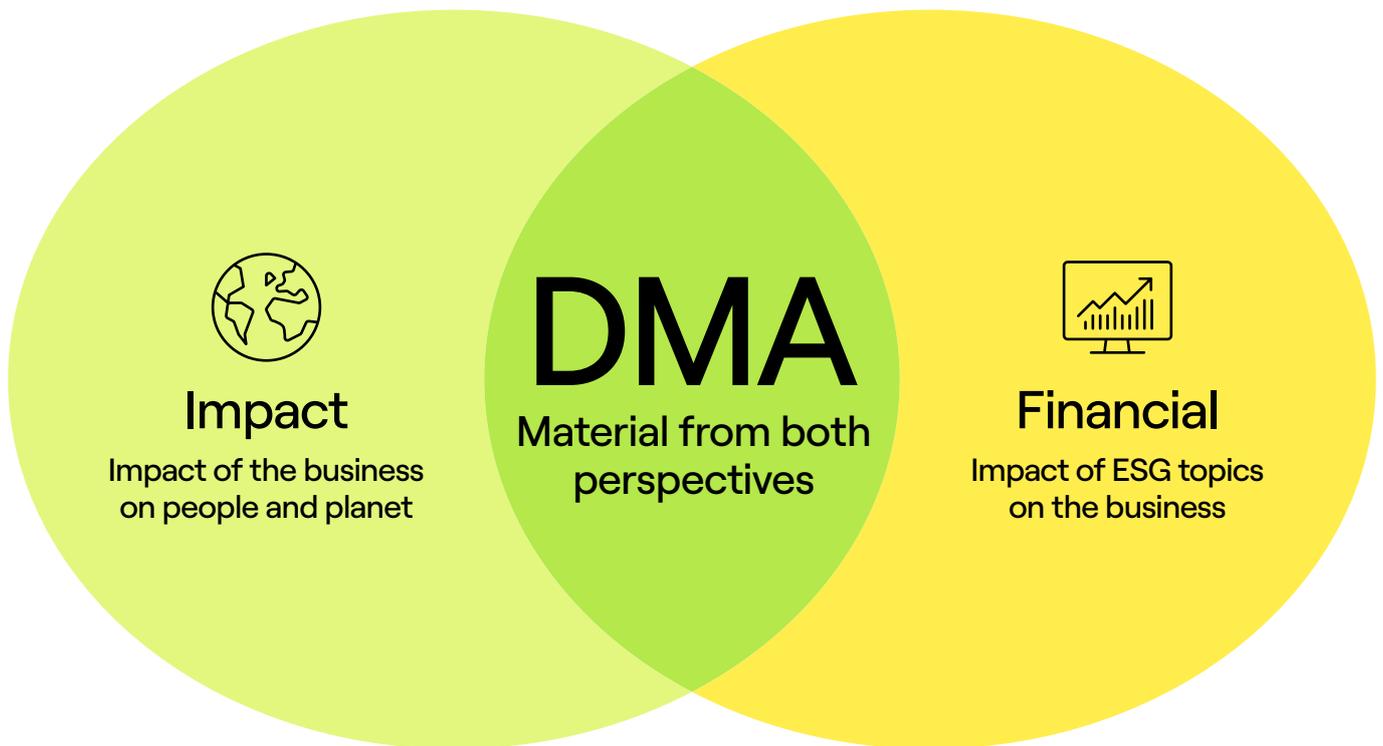


This report reflected the post-COVID societal shifts, with a greater focus on social topics. Skill development, People management, Wellbeing, Freedom of expression and Human rights were all upgraded in importance, as were Climate change and Consumer environmental awareness. For the topics that didn't meet the materiality threshold, the issues were split into three further categories: strategic, operational and emerging.

# How does a DMA work?

Definitions of traditional materiality assessments are varied but broadly take an 'outside-in' view, whereby sustainability topics are assessed based on their financial impact on the company. A DMA builds on this by also explicitly requiring companies to take an 'inside-out' view, assessing the impact it is having on people and planet, not just from direct operations but across its full value-chain.<sup>7</sup>

'Material' topics are determined through the DMA based on a largely qualitative scoring process. Topics are broken down into relevant sub-topics, and then a list of related potential and actual impacts, risks and opportunities (IRO) is identified and scored. If an IRO passes either the financial or impact threshold (which is set by the company), or both, it may result in the topic being considered material.



## Worked example (taking a hypothetical, company-specific view)

<p><b>Topic</b> →</p> <p><b>Sub-topic</b> →</p> <p><b>Impact(s)</b> →</p> <p>● Positive</p> <p>● Negative</p> <p><b>Financial Impact(s)</b> →</p> <p>● Risk</p> <p>● Opportunity</p>	<p><b>Water pollution</b></p> <p style="background-color: #90EE90; border-radius: 15px; padding: 5px; display: inline-block;">Water pollution from factory discharges</p>
	<ul style="list-style-type: none"> <li>● <b>Negative impact(s):</b> Discharges from factories in [X] region may enter the water system during periods of heavy rain and affect biodiversity (animals and plants) and local communities who rely on this source</li> <li>● <b>Risk(s):</b> Heavy fines may be incurred if the company is found to have discharged chemicals into water systems; and reputational damage from pollution may impact revenue</li> </ul>

<sup>7</sup> "Value chains are an integral part of strategic planning for many businesses today. A value chain refers to the full life cycle of a product or process, including material sourcing, production, consumption and disposal/recycling processes". We Mean Business Coalition, *Collaboration, innovation, transformation*, 2011, p.3, <https://docs.wbcsd.org/2011/12/CollaborationInnovationTransformation.pdf>.

# Methodology

The process for this research was inspired by a number of core elements of EFRAG's DMA implementation guidance<sup>3</sup>, including the breakdown of topics; impacts, risks and opportunities; the discussion of materiality through the lens of impact and financial; and interviews with external stakeholders.

Over the course of 2025, the RMF working group collaborated across the following phases:

# 1

**Establish a working group:** the RMF has a long history of working groups which convene on topical ideas and challenges. A working group came together from across the participant companies in the RMF, representing different sub-sectors, geographies, and business models. The working group maintained a core set of stakeholders, ensuring consistency and continuity across the process.

# 2

**Develop a long-list of potential sustainability topics relevant to the media industry:** the starting point was a landscape review of industry reports and raters across media sub-sectors (available in [Appendix A, p.33](#)), and the European Sustainability Reporting Standards (ESRS) topics and sub-topics (which are sector-agnostic).

# 3

**Consolidate a short list:** the long-list of topics was consolidated by identifying a mutually exclusive yet collectively exhaustive short-list. These were categorised into environment, social, governance, and sector-specific topics (i.e., topics which are specific to media and are not covered by the sector-agnostic ESRS, such as content). Both the long-list and short-list were shared with the working group for feedback.

# 4

**Identifying impacts, risks and opportunities (IROs):** for each topic in the short-list, a set of IROs were identified through research and through internal consultation with the RMF working group. As this research intended to cover the media industry as a whole, the IROs were relatively high-level. However, where there were clear IROs which would be material and relevant to one media sub-sector but not others, they were included and referenced as such, e.g., deforestation in the publishing industry.

5

**Ranking the IROs:** a short survey asked the working group to rate the IROs from 1-5 for impact and for financial materiality. This exercise gave an indicative ranking for the IROs, which was discussed in a working group session. These surveys then contributed to the wider assessment process.

6

**Assessing the IROs:** using the survey results, the impacts were assessed based on the scale (i.e., how positive or negative), scope (i.e., how many people/geographies affected), and if negative, the irremediability (i.e., how hard is it to remediate the impact). The risks and opportunities were assessed based on the likelihood of occurrence and potential magnitude. As this research was conducted at the industry level, the IROs were only qualitatively assessed, and at a very high-level. Therefore, they should be viewed as indicative but not definitive. At this stage, three 'results' scenarios were discussed with the working group based on three potential thresholds. Through discussion, the group landed on the threshold which produces the table on [page 10](#).

7

**External discussion:** the table of 'results' was then discussed with external stakeholders within the industry, to get further feedback and input. In some cases, insights from these interviews were taken into account and the 'results' table was adjusted accordingly. The list of external stakeholders was established in consultation with the working group.

**External stakeholders:**



# Summary of findings

## 2025 Material Topics

### Colour Key

Sector-specific

Environmental

Social

Governance

### Material: Impact and Financial

- 7 Diverse content
- 10 Digital transition
- 11 AI
- 13 Diversity, equity & inclusion (OW)
- 15 Health, safety & wellbeing (OW)

### Material: Impact only

- 2 Carbon footprint
- 3 Green production
- 4 Supplier engagement
- 5 Advertising emissions & advertised emissions
- 6 Material sourcing
- 8 Freedom of expression
- 9 Responsible content
- 12 Education: access & quality
- 16 Worker & Human Rights (SC)
- 17 Freelance workers
- 18 Child & forced labour (SC)
- 19 Product & consumer safety
- 20 Accessibility
- 21 Responsible marketing
- 24 Supplier & corp. partner management

### Material: Financial only

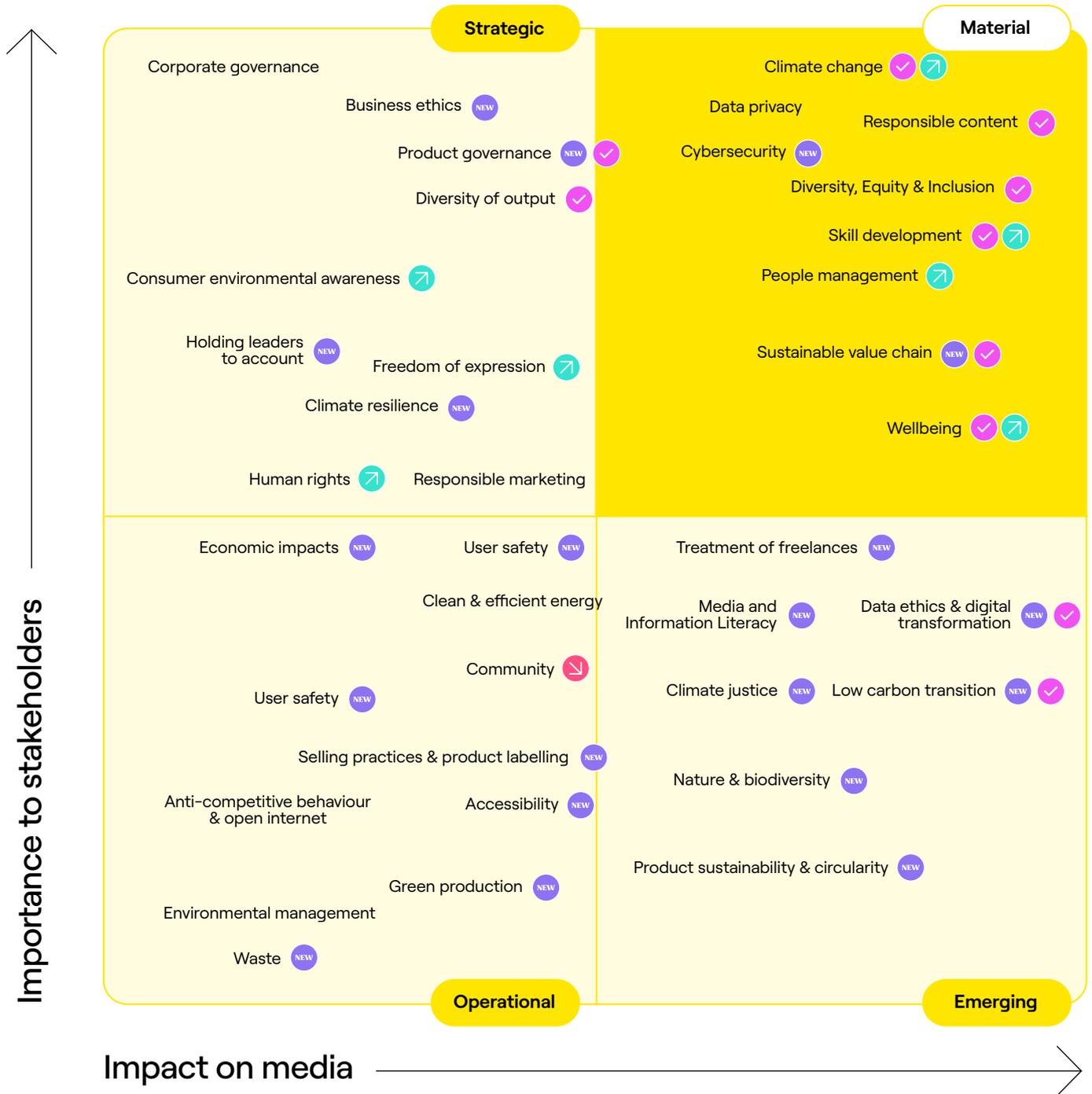
- 1 Climate resilience
- 15 People (human capital)
- 22 Responsible marketing
- 23 Cybersecurity

OW = Own Workforce; SC = Supply Chain

**A note on the results:** this report frequently refers to the RMF's 2022 materiality assessment to highlight key, relevant changes across the last three years. In that report, the topics were plotted on a results matrix based on their scores - the remaining topics were divided into strategic, emerging and operational issues for the media sector (see next page). This year, a new approach was taken: the topics which passed either the impact or financial threshold, or both, are listed rather than plotted on a graph. This is due to the change in methodology and the 'double lens' approach, meaning direct comparison year over year isn't possible.

It also reflects the challenge of conducting a scoring exercise at a sector-wide level. The scoring process was used as a mechanism to try to reflect the common and shared views of the stakeholders; it was not possible to 'accurately' score topics (and particularly risks and opportunities) at this high-level due to the wide variations across sub-sectors and companies. Therefore, the list view is more conducive to the intended aims of this report: a springboard for ideas and discussion within companies as they consider which topics might be material to their business for strategy or disclosure.

Previous 2022 materiality assessment



**Key**

- ↗ Issues upgraded in importance
- ↘ Issues downgraded in importance
- (NEW) New issues
- ✓ Opportunities

- 2022 results categories:**
- Strategic** an issue that has the potential to significantly affect the ability of the company to deliver its strategy in the medium to long term.
  - Operational** an issue that matters for other reasons – internal, reputational, efficiency – but is neither material nor strategic. Under normal circumstances, it does not represent a significant threat to the company.
  - Emerging** an issue that is not yet widely on the radar of a company or its stakeholders, but is increasing in importance and expected to become a material or strategic issue within the next two years.

# 2025 Material Topics



## Content

Content has been a focus of the RMF since the 2013 Mirrors or Movers report and is consistently viewed as one of the most material topics to media.<sup>8</sup> It has led to a successful Mirrors or Movers conference series and subsequent reports on the impact of content to society (2017's The Future of Responsible Media, 2020's The Superpower of Media: Mirrors or Movers II and 2025's Measuring Content Impacts in the Media Sector).<sup>9,10,11</sup> Throughout this period, the resounding consensus has been that content is the media sector's superpower and therefore one of its most impactful sustainability issues. In the 2022 materiality report, content was consolidated into one material issue, Responsible content. This year, the topic was split out into a more granular set of sub-topics, reflecting the maturing concept of content impact and specifically, how to measure that impact. The following sub-topics (and IROs) emerged as material to media in 2025: **Diverse content**, **Freedom of expression** and **Responsible content**. The sub-topics of Climate content and awareness, Innovation, Media and information literacy, and Partnerships were discussed but ultimately deemed less material at present.

### Diverse content

- **Positive impact(s):** providing consumers with more diverse representation in content can help to increase inclusion and awareness, positively impacting society. Diversity, Equity and Inclusion (DEI) is a clear focus for media companies when developing content and when considering its impact, and recent research supports this. The RMF's 2025 content impact report found that 89% of RMF participants consider DEI as a priority when creating content.<sup>11</sup> This aligns with OKRE's 2024 research, which reported that over 80% of respondents in the UK entertainment industry share the same view.<sup>12</sup> Other reports seek to measure the impact of storytelling, such as GLAAD's annual report which tracks the presence of lesbian, gay, bisexual+, transgender, and queer (LGBTQ) characters in US TV content to understand and measure representation and inclusion on television.<sup>13</sup>
- **Opportunity(ies):** by providing inclusive representation in content, there is an opportunity to expand audiences and increase brand loyalty. This is proven by the increasing demand within the media industry for greater representation within content, which can positively

8 Christian Toennesen, Simon Hodgson and Francis Mimmack, *Mirrors or Movers? Framing the debate about the impact of media content*, 2013, <https://responsiblemediaforum.org/downloadDocumentFile?document=142>.

9 Christian Toennesen, Simon Hodgson and William Pickett, *The future of responsible media*, 2017, <https://responsiblemediaforum.org/downloadDocumentFile?document=226>.

10 Rosie Towe, Daniel Witte and Christian Toennesen, *The Superpower of Media: Mirrors or Movers II*, 2020, <https://responsiblemediaforum.org/downloadDocumentFile?document=299>.

11 Imogen Crane, Daniel Witte and Miriam Davies, *Measuring Content Impacts in the Media Sector*, 2025, <https://responsiblemediaforum.org/downloadDocumentFile?document=452>.

12 OKRE, *Delivering social impact in entertainment content*, 2025, [https://indd.adobe.com/view/publication/c89e77c7-877b-4517-936c-260e16d094f1/1/publication-web-resources/pdf/OKRE\\_social\\_impact\\_report.pdf](https://indd.adobe.com/view/publication/c89e77c7-877b-4517-936c-260e16d094f1/1/publication-web-resources/pdf/OKRE_social_impact_report.pdf).

13 GLAAD Media Institute, *Where We Are on TV*, December 2025, [https://assets.glaad.org/m/7c489f209e120a11/original/GLAAD-2023-24-Where-We-Are-on-TV.pdf?\\_gl=1\\*82d80i\\*\\_gcl\\_au\\*NzAwNDE2Njc2LjE3NTQ0ODYINzI](https://assets.glaad.org/m/7c489f209e120a11/original/GLAAD-2023-24-Where-We-Are-on-TV.pdf?_gl=1*82d80i*_gcl_au*NzAwNDE2Njc2LjE3NTQ0ODYINzI).

impact engagement.<sup>14,15</sup> A 2020 report by the Creative Artists Agency and Parrot Analytics found there is growing demand for on-screen diversity in the US: the share of audiences expecting at least 40% of the cast to be diverse doubled compared to three years earlier.<sup>16</sup> Similarly, where businesses have a clear purpose, culture and strong performance on sustainability and DEI, they can see positive impacts on the attraction and retention rates of employees. A sense of belonging in the workplace can increase job performance by up to 56%, according to a study with over 3,000 US workers by BetterUp.<sup>17</sup>

## Freedom of expression

- **Positive impact(s):** high-quality content and/or independent, investigative journalism helps to hold power accountable and enable public debate, thereby helping to foster democratic values such as transparency and freedom of expression. The European Broadcasting Union (EBU) explores the relationship of trust between Public Service Media (PSM) across the EU and their audiences in their 2025 report.<sup>18</sup> Their findings show that PSM is the most trusted source of news in 91% of the EBU members surveyed, and that the more trustworthy a country's citizen finds PSM news, the stronger the freedom of expression.
- **Risk(s):** there is a challenge for media companies to strike a balance between freedom of expression and the necessary limits around potentially harmful content. In an increasingly polarised world, there is also a greater spotlight on biased content, both conscious and unconscious, and the potential to alienate current and future audience segments. Many media companies are actively training staff to mitigate bias. Some organisations, particularly PSM, must operate under strict impartiality requirements. When bias is acute or freedom of expression is mismanaged, it can affect audience trust, reduce engagement in some segments, and even cause further fragmentation. When organisations take a particular stance, where there may be strongly opposing views, it could even impact opportunities linked to Request for Proposals (RFPs) or distribution, and ultimately future revenue.

## Responsible content

- **Negative impact(s):** media companies have a responsibility to manage the potential negative impacts of misinformation and a duty to verify and fact-check any of the content they produce or publish. This particularly impacts PSM, which is expected to meet strict impartiality expectations. It also touches on the idea that the way content is edited, how individuals are portrayed, and the context in which it is distributed could influence its impact on society. There is the potential for rapid mistrust in 'traditional' media, and organisations must strive to produce accurate, fact-based content which does not spread harmful sentiment. The Reuters Institute Digital News Report 2024 found that across global markets, the majority of respondents considered openness, accuracy, fairness and lack of bias as very or somewhat important when deciding what news outlets to trust (72% transparent and open; 69% high journalistic standards; 65% represent people like me fairly; and 61% perceptions of bias/lack of bias).<sup>19</sup> The increasing personalisation of media content could limit audience exposure towards diverse perspectives and therefore deepen societal divisions and lead to unbalanced public discourse. There are a growing number of examples of media companies seeking to combat this, such as Sveriges Radio (in Sweden), which has developed an algorithm that integrates key public service values whilst recommending content (such as stories recorded on location, providing new perspectives, including affected voices and offering independent viewpoints) rather than purely user engagement metrics.<sup>20</sup>

# 91%

of EBU members surveyed found Public Service Media (PSM) to be the most trusted source of news

14 FT Strategies, *Diversity Inside Media Organisations: Trends 2024*, 2024, <https://www.ftstrategies.com/en-gb/insights/diversity-inside-media-organisations-report>.

15 Project Diamond, *Diamond: The Seventh Cut*, September 2024, [https://creativitydiversitynetwork.com/wp-content/uploads/2024/09/Standard-main-Report-Diamond-The-Seventh-Cut\\_CDN\\_12-Sept-2024pdf.pdf](https://creativitydiversitynetwork.com/wp-content/uploads/2024/09/Standard-main-Report-Diamond-The-Seventh-Cut_CDN_12-Sept-2024pdf.pdf).

16 Creative Artists Agency and Parrot Analytics, *Measuring what matters: The impact of talent diversity on audience demand for television*, October 2020, [insights.parrotanalytics.com](https://insights.parrotanalytics.com).

17 BetterUp, *The Value of Belonging at Work: New Frontiers for Inclusion in 2021 and Beyond*, 2020, <https://grow.betterup.com/resources/the-value-of-belonging-at-work-the-business-case-for-investing-in-workplace-inclusion>.

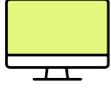
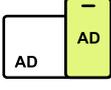
18 European Broadcasting Union, *Trust in Media: Public Service Media as Islands of Trust*, September 2025, <https://www.ebu.ch/publications/trust-in-media>.

19 Reuters, *Reuters Institute Digital News Report 2024*, 2024, p.25, [https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2024-06/RISJ\\_DNR\\_2024\\_Digital\\_v10\\_lr.pdf](https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2024-06/RISJ_DNR_2024_Digital_v10_lr.pdf).

20 Laura Garty, *Personalised news: how to balance technology and editorial integrity*, July 2024, <https://reutersinstitute.politics.ox.ac.uk/personalised-news-how-balance-technology-and-editorial-integrity>.

## Content is one of the hardest topics to measure and define, yet it is arguably the most material topic to media.

As Christina Figueres said in the RMF’s Superpower of Media report, “There has never been a more urgent need for the superpower of media companies”.<sup>10</sup> Whilst most media companies recognise that their content and its impact is material, a key challenge remains to be solved: how to measure the impact and translate insights into action. Furthermore, the measurement challenge differs depending on the media sub-sector and the stage of content creation in question (e.g., from writing and ideation to distribution or audience viewing). These nuances are key to understanding and measuring the impact of content and the role media companies play in shaping how society is portrayed and represented. The RMF’s 2025 content impact report explores which sub-sectors have managed to develop solutions that start to lift the lid, for example advertising and broadcasters, and these could potentially be replicated or adapted for other sub-sectors.<sup>11</sup> The report explored a number of media sub-sectors and how content-related responsibilities may differ across the industry:

Sub-sector			Types of content and example responsibility considerations
	<p><b>Public broadcasters</b></p> 	<p>Produce and distribute media content, including video and digital news, and video entertainment programming, with responsibility for content accuracy and impartiality. They must comply with public service standards and avoid harmful content.</p>	
	<p><b>News</b></p> 	<p>Produce and distribute print and digital news content. News organisations have a responsibility to produce high quality journalism and accurate content, whilst preventing the spread of misinformation.</p>	
	<p><b>Streamers</b></p> 	<p>Offer on-demand and live-streamed video content across digital platforms. Content is moderated for harmful behaviour, for example through use of age rating systems.</p>	
	<p><b>Publishers</b></p> 	<p>Create and publish written and digital publications such as books, magazines, academic journals, and online articles. Obligations to fact-check, avoid misinformation and uphold high ethical standards.</p>	
	<p><b>Advertisers</b></p> 	<p>Develop and deliver promotional content across multiple media channels. Advertisers must maintain truthfulness, avoid misleading claims and not promote harmful content.</p>	

## Digital Transition

**Digital transition** and **Artificial Intelligence (AI)** clearly emerged as priority sub-topics in 2025; both were identified as sector-specific topics, and there was agreement that there is a lack of clear reporting guidance in the main sustainability reporting standards. Whilst digital emissions (AI-related emissions were discussed separately, see below) did not emerge as a material sub-topic itself, there were many discussions around the environmental impact of the digital transition and it is on many company watchlists. Media products and services are increasingly moving online or onto digital devices and consequently, organisations are trying to understand the environmental impact of this transition. For example, **DIMPACT** is a 'think and do' coalition seeking science-based solutions to reduce the environmental impacts of serving digital media products, including tools to try to calculate the digital carbon footprint. In late 2025, DIMPACT commissioned the Carbon Trust to develop a white paper exploring the emissions of generative AI in the media sector, which will be published in 2026.

### Digital transition

- **Risk(s):** this refers to the challenges of monetising digital products and services, particularly in a market flooded with free content. The 2025 Reuters Digital News Report found that engagement with traditional media sources across global markets such as news websites, TV and print continues to fall, whilst engagement and dependence on social media, video platforms and online aggregators increases.<sup>21</sup> The democratisation of content creation and the boom of content creators online could reduce market share for more traditional media organisations. User-driven content on social and other digital platforms (e.g., TikTok and Meta) represents a key growth area for advertising revenue, continuing to overtake traditional media in 2025.<sup>22</sup>

### Artificial Intelligence (AI)

- **Positive impact(s):** AI has the potential to reduce mundane tasks (possibly increasing job satisfaction and efficiency) within own operations, when properly managed and governed; McKinsey has estimated a \$4.4 trillion long-term opportunity from AI-driven added productivity growth potential (corporate use cases).<sup>23</sup> AI can also improve personalisation and increase the accessibility of products and services, helping meet the needs of the two and a half billion individuals worldwide that require one or more assistive products. Examples of these products include AI-powered speech recognition, predictive text or literacy tools.<sup>24,25</sup>
- **Negative impact(s):** the sizeable carbon footprint and water usage linked to data centres is of increasing concern. The International Energy Agency reported that a request made through ChatGPT, a generative AI model,<sup>26</sup> consumes 10 times the electricity of a Google search.<sup>27</sup> Furthermore, according to one estimate, global AI-related infrastructure is soon expected to consume more water than Denmark, a country of six million.<sup>28</sup> There are some efforts to manage this impact. For example, the US National Institute of Standards and Technology (NIST) develops and promotes measurement standards, science, technology, and best practices across industries; and there are established standards such as ISO 42001 and 42005 which cover AI management and guidance on how to conduct assessments for individual AI systems.<sup>29</sup> Secondly, counter to the identified positive impacts, there are concerns about how AI could threaten jobs, livelihoods and even sectors. In the media sector, technological advances are viewed by many as a major threat to the livelihoods of actors, screenwriters and production crews; there is now the technology to scan an actor (paying for one day of time) and use that likeness in any project, potentially eternally. In 2023, 65,000 Hollywood actors and studios went on strike because of this labour issue, voicing their concerns about the future of their craft in the industry.<sup>30</sup> As AI rapidly evolves, it also raises 'profound ethical concerns' about how it is

21 Reuters, *Reuters Institute Digital News Report 2025*, 2025, [https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2025-06/Digital\\_News-Report\\_2025.pdf](https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2025-06/Digital_News-Report_2025.pdf).

22 WPP Media, *This Year Next Year 2025 Global Midyear Forecast*, June 2025, <https://www.wppmedia.com/news/tyny-midyear-2025>.

23 McKinsey, *Superagency in the Workplace*, January 2025, <https://www.mckinsey.com/capabilities/tech-and-ai/our-insights/superagency-in-the-workplace-empowering-people-to-unlock-ais-full-potential-at-work#/>.

24 World Health Organization, *Assistive Technology*, January 2024, <https://www.who.int/news-room/fact-sheets/detail/assistive-technology>.

25 Digital Learning Institute, *Revolutionising Accessibility: The Role of AI in Assistive Technology*, accessed 2nd December 2025, <https://www.digitallearninginstitute.com/blog/revolutionising-accessibility-the-role-of-ai-in-assistive-technology>.

26 Generative AI model models build content (text, images or programming code) based on the patterns learned from training data. Large Language Models (LLMs) are those that generate text and can be open-source (e.g., ChatGPT, anthropic) or proprietary. Ray Eitel-Porter, Paul Dongha and Miriam Vogel, *Governing the Machine: How to Navigate the Risks of AI and Unlock Its True Potential*, Bloomsbury Publishing, 2025.

27 International Energy Agency, *Electricity 2024: Analysis and forecast to 2026*, January 2024, <https://iea.blob.core.windows.net/assets/6b2fd954-2017-408e-bf08-952fdd62118a/Electricity2024-Analysisandforecastto2026.pdf>.

28 Pengfei Li et al., *Making AI Less "Thirsty": Uncovering and Addressing the Secret Water Footprint of AI Models*, Communications of the ACM, 2023, <https://arxiv.org/pdf/2304.03271>.

29 Ray Eitel-Porter, Paul Dongha and Miriam Vogel, *Governing the Machine: How to Navigate the Risks of AI and Unlock Its True Potential*, Bloomsbury Publishing, 2025.

30 Megan Cerullo, *Striking actors and studios fight over control of performers' digital replicas*, CBS News, July 2023, <https://www.cbsnews.com/news/actors-strike-digital-replicas-artificial-intelligence/>.

being used.<sup>31</sup> For example, there are now easily accessible 'Deadbots' and 'Griefbots': AI chatbots that simulate the deceased based on the digital footprint they leave behind. This raises a raft of concerns about the potential psychological damage to grieving users, particularly if those users are children.<sup>32,33</sup>

- **Opportunity(ies):** AI can create efficiencies and potentially reduce overhead costs in a work environment. For example, studies show that the use of AI assistants at work can increase worker productivity by 15% on average (measured by issues resolved per hour).<sup>34</sup>
- **Risk(s):** Intellectual Property (IP) and creative property is of growing concern because AI may be trained on copyrighted information without appropriate licenses, depending on the information that users input in their prompts.<sup>35</sup> In 2023, The New York Times filed a lawsuit against Open AI and Microsoft over the unauthorised use of copyrighted work to train their AI models; the case is ongoing.<sup>36</sup> Furthermore, since any information that a user enters in their prompt can be used by the tool, it raises the risk of confidential or sensitive information entering the public domain (particularly if the tool itself is public, e.g., ChatGPT). Companies (and any individual) using AI needs to invest time and resources into appropriate oversight to ensure AI-generated content remains accurate and truthful. If they don't, companies leave themselves open to risk: in 2023, CNET faced significant reputational damage after publishing AI-generated content containing factually incorrect information and plagiarism.<sup>37</sup> One challenge which companies will face when designing governance structures is the lack of visibility and access to the data pool which the tools are trained with. Secondly, the increasing use of AI to replace search engines can pose potential risks to media companies that rely on Search Engine Optimisation (SEO) to drive traffic (and therefore revenue) to their content, as consumers are no longer directly accessing website content. This is primarily a risk for subscription-based services, as well as paid advertising on sites or search engines, which rely on page landings and direct traffic. A new study found that when search results are delivered below an AI summary, a result that was previously ranked first could lose around 79% of its traffic.<sup>38</sup>

## RMF Focus for 2026

Within the RMF, and the industry generally, AI and trust in the media are emerging as core focus areas. Although AI is seen as a major opportunity by the financial market, companies are uncertain on how to responsibly integrate AI into their systems. A considered approach is needed to balance the risks and opportunities of AI adoption and to unlock the expected benefits and value, whilst simultaneously avoiding regulatory consequences and reputational damage. The responsible use of AI is of increasing concern amongst media companies in particular due to issues around fake news and misinformation, which can be exacerbated by AI-generated content.

Media companies (and other industries) are starting to explore ethical guidelines for the use and governance of AI within their businesses, in order to build trust amongst consumers, investors and colleagues. For example, RELX published their responsible AI principles in August 2024, which has five underpinning pillars: considering real-world impact; taking action to prevent unfair bias; explaining how their solutions work; creating accountability with human oversight; and respecting privacy and championing data governance.<sup>39</sup>

In the face of this rapidly evolving topic, the RMF is establishing a working group on AI governance in media. The group plans to work closely with its participants and the wider industry to publish a set of responsible AI principles for the media sector.

31 UNESCO, *Recommendation on the Ethics of Artificial Intelligence*, accessed 15th January 2026, <https://www.unesco.org/en/artificial-intelligence/recommendation-ethics>.

32 Tomasz Hollanek & Katarzyna Nowaczyk-Basińska, *Griefbots, Deadbots, Postmortem Avatars: on Responsible Applications of Generative AI in the Digital Afterlife Industry*, Philosophy & Technology, April 2024, <https://doi.org/10.1007/s13347-024-00744-w>.

33 University of Cambridge, *Calls for safeguards to prevent unwanted 'hauntings' by AI chatbots of dead loved ones*, May 2024, <https://www.cam.ac.uk/research/news/call-for-safeguards-to-prevent-unwanted-hauntings-by-ai-chatbots-of-dead-loved-ones>.

34 Erik Brynjolfsson, Danielle Li and Lindsey Raymond, *Generative AI at Work*, The Quarterly Journal of Economics, May 2025, <https://doi.org/10.1093/qje/qjae044>.

35 Ray Eitel-Porter, Paul Dongha and Miriam Vogel, *Governing the Machine: How to Navigate the Risks of AI and Unlock Its True Potential*, Bloomsbury Publishing, 2025.

36 Michael M. Grynbaum and Ryan Mac, *The Times Sues OpenAI and Microsoft Over A.I. Use of Copyrighted Work*, The New York Times, December 2023, <https://www.nytimes.com/2023/12/27/business/media/new-york-times-open-ai-microsoft-lawsuit.html>.

37 Paul Farhi, *A news site used AI to write articles. It was a journalistic disaster*, January 2023, <https://www.washingtonpost.com/media/2023/01/17/cnet-ai-articles-journalism-corrections/>.

38 Michael Savage, *AI summaries cause 'devastating' drop in audiences, online news media told*, July 2025, <https://www.theguardian.com/technology/2025/jul/24/ai-summaries-causing-devastating-drop-in-online-news-audiences-study-finds>.

39 RELX, *Responsible AI Principles*, August 2024, <https://www.relx.com/~media/Files/R/RELX-Group/documents/responsibility/download-center/relx-responsible-ai-principles.pdf>.

## Social Impact

This topic was a broadly discussed subject, which covered community giving, social impact work, educational support, and the opportunity for companies to develop values-driven reputations. It was the sub-topic of **Education** (both access to it, and quality of it) which emerged as significant to the industry this year. Some of the contextual drivers of this topic's prominence in 2025 are the increasing use of technology in schools, particularly for homework (80% of UK-based teachers use technology to support with homework-related teaching and learning), and the use of AI for school-related learning (nearly 1 in 3 parents reported their child - of ages zero to eight - has used AI for school-related material in the US).<sup>40,41</sup> Furthermore, many media companies have a long history of providing educational resources that can enhance and support learning.

# 80%

of UK-based teachers use technology to support with homework-related teaching and learning

### Education, access and quality

- Positive impact(s):** media companies can help to democratise knowledge, bridge socioeconomic gaps and empower underserved communities to participate more fully in educational and economic opportunities. For example, BBC Education in the UK provides support across the curriculum and age-ranges: BBC Bitesize was rated the most useful resource by GCSE students last year and receives two and a half million unique browsers on average each week during term-time; BBC Teach supports teachers with curriculum resources; and Tiny Happy People supports parents and carers with development skills for very young children (0-4 years-old).<sup>42</sup> Penguin has a similar focus on educational support for schools, particularly access to books and reading. Their research shows that one in seven primary schools in England do not have a library (rising to one in four for the most disadvantaged communities).<sup>43</sup> This is compounded by local libraries shutting down: more than 180 council-run libraries in England have been closed or handed over to volunteers since 2016.<sup>44</sup> In response, Penguin has been working with the National Literacy Trust (and over 30 campaign partners) since 2018 to try to change this with their campaign, Libraries for Primaries.<sup>43</sup> They offer participating schools a collection of 400 books from Puffin (their children's publisher) and a selection of 100 books from independent publisher partners for free.



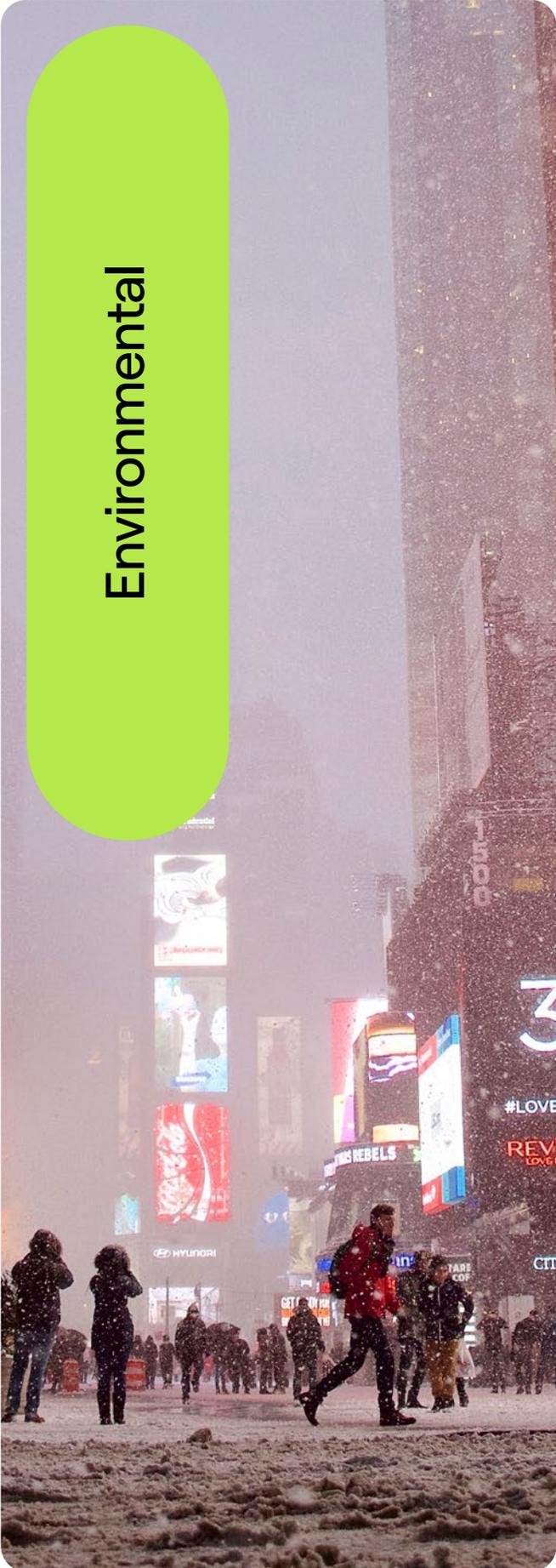
40 UK Government Department for Education, *2022-23 Technology in Schools Survey*, November 2023, p.53, [https://assets.publishing.service.gov.uk/media/655f8b823d7741000d420114/Technology\\_in\\_schools\\_survey\\_\\_2022\\_to\\_2023.pdf](https://assets.publishing.service.gov.uk/media/655f8b823d7741000d420114/Technology_in_schools_survey__2022_to_2023.pdf).

41 Supreet Mann, Amanda Lenhart and Michael Robb, *The Common Sense Census: Media Use by Kids Zero to Eight*, Common Sense Media, 2025, p.4, <https://www.commonsensemedia.org/sites/default/files/research/report/2025-common-sense-census-web-2.pdf>.

42 BBC, *BBC Education*, accessed 20th November 2025, <https://www.bbc.com/aboutthebbc/whatwedo/publicservices/learning>.

43 Penguin UK, *Libraries for Primaries*, accessed 27th November 2025, <https://www.penguin.co.uk/about/social-impact/our-recent-impact/libraries-for-primaries>.

44 Paul Lynch, Pilar Tomas and Alix Hattenstone, *Public libraries in 'crisis' as councils cut services*, BBC News, September 2024, <https://www.bbc.co.uk/news/articles/cn9lexpl5o>.



## Environmental

## Climate change adaptation

As is often the case, discussions on climate-change adaptation were more focused on the financial risks and opportunities, whilst climate-change mitigation led to discussions on company impacts to the environment and society. Reporting on climate risk has evolved over the last decade, driven by regulatory pressures, investor demand and the recognition of climate change as a financial risk. In most large companies, climate-related financial analysis has become part of enterprise risk management, particularly in regions where it is now required by law, which includes in the UK, in Australia, and in California (pending appeal, as of early 2026).

Therefore, there are many strong examples in the industry of detailed, company-specific climate-scenario analysis, both qualitative and quantitative, such as The Economist Group, Comcast, Vodafone and Dentsu. Climate risk reporting generally follows one of the globally recognised frameworks, such as the Taskforce on Climate-related Financial Disclosures (TCFD), now integrated into the International Financial Reporting Standards (IFRS). Best practice includes modelling multiple climate scenarios to assess both transition risks (policy, technology, market changes) and physical risks (extreme weather). Leading companies go further by financially quantifying these risks and integrating them into their financial statements.

The risks that were discussed, which many will be familiar with, included disruption from extreme weather to infrastructure (e.g., telecommunications, data centres and digital outages) and to the supply chains for raw materials (e.g., paper in the publishing industry, or components for routers, phones and televisions in telecommunications). The discussion also touched on the impacts of adaptation activity, such as the increased demands for energy and refrigerants (and therefore emissions) as humans increasingly seek to climate-regulate buildings and homes.

**As a creative industry, media largely depends on human labour and therefore may be more acutely at risk of productivity losses due to climate-related impacts on human health.**

Therefore, as climate-related risks and opportunities tend to be covered by company-specific climate scenario analysis, this report has focused on the material risk which emerged in stakeholder discussions: **Climate resilience**, specifically in relation to climate change and human health. As a creative industry, media largely depends on human labour and therefore may be more acutely at risk of productivity losses due to climate-related impacts on human health.

### Climate resilience

- **Risk(s):** the effects of climate change on human health will worsen as extreme temperatures increase in frequency and magnitude. The World Health Organisation (WHO) sees climate change as a “threat multiplier” to human health and has set up the Pan-European Commission on Climate and Health in response.<sup>45</sup> The resulting impacts to human health will affect workforce and supply chain productivity: according to a Wellcome report, heat exposure resulted in a loss of 490 billion potential work hours in 2022 (42% more than the annual average two decades ago).<sup>46</sup> Furthermore, the research suggests that between 25–40% of those exposed to extreme weather events will experience negative mental health outcomes. This will be more acutely felt for companies and supply chains in the Southern Hemisphere, where temperatures could become dangerous or uninhabitable in higher temperature climate scenarios, and for anyone with existing health or medical conditions.

## Climate change mitigation

Climate change mitigation is primarily focused on companies’ impacts on the climate, such as the Greenhouse Gas (GHG) emissions from their direct and operational value chains. Within this broader topic, the material sub-topics which emerged were generally linked to quantifiable impacts – **Carbon footprint, Production and Supplier engagement** – where there is scope for measurement and reporting.

This contrasts to the potential positive impact of climate-related content for the industry (see page 11), where the lack of resources and tools to measure its impact can block progress. Other climate change mitigation impacts that were discussed as highly relevant to media were the use of content to promote climate justice (and possibly behaviour changes) and digital emissions. Emissions related to advertising emerged as a growing area of concern, particularly following external engagement. Distinctions were made in the discussions between **Advertising Emissions** (those from the production and dissemination of adverts) and **Advertised Emissions** (defined by Purpose Disruptors as the “uplift in greenhouse gas emissions (GHGs) driven by the increased sales that result from advertising”).<sup>47</sup>

### Carbon Footprint

- **Negative impact(s):** the media industry’s Scope 1, 2 and 3 footprints are considerable. In 2023, the average Scope 1 and 2 footprints across the top ten media companies (including Amazon, Alphabet, Apple, Walt Disney, Comcast) was 2.75 million tonnes of CO<sub>2</sub>, which is directly contributing to global climate change and global warming.<sup>48</sup>



45 WHO, *Climate Change*, October 2023, <https://www.who.int/news-room/fact-sheets/detail/climate-change-and-health?>

46 Wellcome, *The human cost of climate change*, November 2023, <https://wellcome.org/insights/reports/human-cost-climate-change-health-needed-accelerated-and-equitable-climate-action>.

47 Purpose Disruptors, *What are Advertised Emissions?*, accessed November 18th 2025, <https://www.purposedisruptors.org/advertised-emissions>.

## Production

- **Negative impact(s):** production within media has a considerable carbon and environmental footprint, taking into account the sheer workforce involved, including catering, travel, equipment, and filming on location. In 2024, the UK TV and Film industry was responsible for almost 175,000 tonnes of CO<sub>2</sub> (most of which was attributed to travel), which is equivalent to the annual footprint of nearly 40,000 UK citizens.<sup>48</sup> There are some organisations working to measure, reduce and certify the emissions of productions, such as [BAFTA albert](https://wearealbert.org/).<sup>49</sup>

## Supplier engagement

- **Positive impact(s):** suppliers make up the majority of Scope 3 emissions, which typically account for 70–99% of company footprints – on average, Scope 3 emissions are 11.4 times larger than emissions from operations.<sup>50</sup> Active supplier engagement programmes are critical to value chain reduction plans and transition plans. A transition plan is a strategic roadmap that outlines a company’s transition towards net zero. Incoming regulation is requiring companies to disclose their transition plans publicly, such as the Australia Sustainability Reporting Standards (ASRS), which requires companies to show how they will adapt and transform to align with sustainability goals. The ASRS and frameworks like the Transition Plan Taskforce (TPT) are also asking companies to conduct scenario analysis to test how achievable their transition plan and targets are. As regulation increasingly includes transition plans, companies will need to embed more active supplier engagement into their procurement and compliance programmes, as well as supporting their key suppliers with decarbonisation (e.g., training and information sharing).

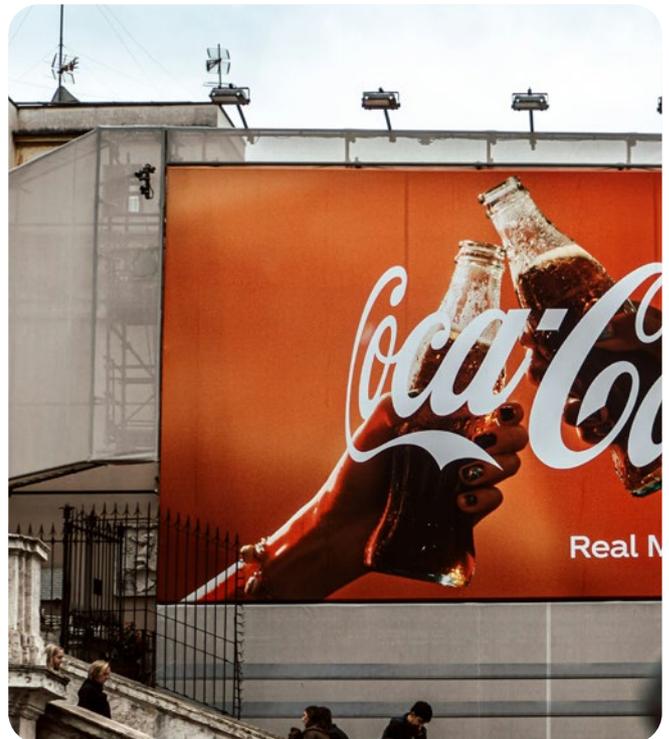
Almost

# 175k

tonnes of CO<sub>2</sub> was produced by the UK TV and Film industry in 2024

## Advertised Emissions and Advertising Emissions

- **Negative impact(s):** there is industry-wide discussion around Advertising Emissions (from production) and Advertised Emissions (from the products and services sold as a result) including: how they should be measured, who needs to report on them, and the extent to which they play a role in industry net-zero targets. [Ad Net Zero](https://adnetzero.com/)<sup>51</sup> is an organisation that aims to help business reduce Advertising Emissions (with tools, resources, frameworks and education materials), whilst [Purpose Disruptors](https://www.purposedisruptors.org/)<sup>52</sup> are calling for industry measurement and action on Advertised Emissions (a concept they introduced at COP26). Another topic that emerged as ‘one to watch’ was the broader category of Serviced Emissions (of which Advertised Emissions is a sub-category).<sup>53</sup> These are relevant emissions for professional services providers (PSPs), such as consultants, lawyers, and advertisers, and refer to the climate impact of the services they deliver, the advice they provide, or the products they are trying to sell. The footprint is likely to vary significantly between sectors; for example, a legal document review versus an advert promoting airlines.



48 BAFTA Albert, *BAFTA albert Accelerate 2025*, November 2025, <https://wearealbert.org/wp-content/uploads/2025/11/ACCELERATE-2025-BAFTA-albert-report.pdf>.

49 Albert, <https://wearealbert.org/>.

50 CDP, *Scoping Out: Tracking Nature Across the Supply Chain – CDP Global Supply Chain Report 2022*, March 2023, <https://cdn.cdp.net/cdp-production/cms/reports/documents/000/006/918/original/CDP-Supply-Chain-Report-2022.pdf>.

51 Ad Net Zero, <https://adnetzero.com/the-ad-net-zero-action-plan/>.

52 Purpose Disruptors, <https://www.purposedisruptors.org/>.

53 The Oxford Net Zero Serviced Emissions Hub, *The Serviced Emissions Hub*, accessed November 18th 2025, <https://netzeroclimate.org/research/serviced-emissions-hub/>.

## Circular economy and waste

The topic of circularity was discussed through many lenses, including waste from own operations and the supply chain, product-design (considering circular principles) and material sourcing. In the RMF's 2022 report, two relevant topics were newly introduced: Waste and Product sustainability and circularity. In the last three years, the conversation around waste has continued maturing. This has been largely driven by regulation and technological innovation, which has expanded the scope beyond waste reduction to integrating circular economy principles into design and climate strategy.



Examples in the EU include the Waste Framework Directive (which saw significant amendments in 2025),<sup>54</sup> the Regulation on Waste Shipments<sup>55</sup> and the Eco-design for Sustainable Products Regulation<sup>56</sup>. For many media companies, particularly those who do not produce physical products, waste may not be material to their business. For those with production or manufacturing supply chains (particularly publishing and telecommunications), the impacts, risks and opportunities may be greater. In this instance, the sub-topic of **Material sourcing** did emerge as material, but it was recognised that this is primarily a topic for physical supply chains within media.

### Material sourcing

- Negative impact(s):** for paper-based products, sourcing raw materials which are linked to deforestation contributes to environmental degradation and loss of biodiversity. According to the International Energy Agency (IEA), the pulp and paper sector was responsible for just under 2% of all emissions from industry in 2022.<sup>57</sup> There will be some changes that come with the increasing digitisation of published content. For example, 85% of The Economist's new subscribers are digital-only. The Economist Group estimates that a digital edition emits around 12 times less carbon than print.<sup>58</sup> However, the digital transition is not progressing evenly across print types; book readers (especially younger readers) are turning back to printed books. The Guardian reported that in 2023, 669 million physical books were sold in the UK, the highest overall level ever recorded, with Gen Z accounting for 80% of purchases from 2021-2022.<sup>59</sup> For technology-based products, considerations might include metal and critical minerals supply chains, energy usage, and circular design (recycled materials and recyclable, repairable products).

54 EUR-Lex, *Directive (EU) 2025/1892 of the European Parliament and of the Council of 10 September 2025 on amending Directive 2008/98/EC on waste*, 2025, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32025L1892>.

55 EUR Lex, *Regulation (EU) 2024/1157 of the European Parliament and of the Council of 11 April 2024 on shipments of waste amending Regulations (EU) No 1257/2013 and (EU) 2020/1056 and repealing Regulation (EC) No 1013/2006*, 2024, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R1157>.

56 EUR Lex, *Regulation (EU) 2024/1781 of the European Parliament and of the Council of 13 June 2024 establishing a framework for the setting of ecodesign requirements for sustainable products, amending Directive (EU) 2020/1828 and Regulation (EU) 2023/1542 and repealing Directive 2009/125/EC*, 2024, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R1781&qid=1719580391746>.

57 International Energy Agency, *Paper*, accessed 27th November 2025, <https://www.iea.org/energy-system/industry/paper>.

58 The Economist Group, *Annual Report 2025*, 2025, p.45, [https://www.economistgroup.com/pdfs/reports/TEG\\_Annual\\_Report\\_2025.pdf](https://www.economistgroup.com/pdfs/reports/TEG_Annual_Report_2025.pdf).

59 Chloe Mac Donnell, 'Reading is so sexy': gen Z turns to physical books and libraries, *The Guardian*, February 2024, <https://www.theguardian.com/books/2024/feb/09/reading-is-so-sexy-gen-z-turns-to-physical-books-and-libraries>.



## Own workforce

In the 2022 RMF report, Diversity, Equity and Inclusion (DEI), Skill development, People Management and Wellbeing were all found to be material to the media sector, and these remain important in 2025. These priorities have evolved into the current material sub-topics of **Diversity, equity and inclusion (DEI)**, **Talent attraction and retention** and **Health, safety and wellbeing**.

Many of the current findings and reports mirror the same challenges and frustrations of 2022: slow progress is being made on diversity in organisations – particularly at senior levels – and representation in content is improving slower still.<sup>60,61,62</sup> Furthermore, the potential impacts of US rollbacks on DEI may emerge more starkly in the upcoming FY25 reporting cycle.

We are continuing to see a focus on worker wellbeing and health, as industry uncertainty impacts employees. A survey on journalism run by TakTak and Display found that 60% of respondents (from 33 different European countries) report experience with burnout and 62% are forced to supplement their income with other types of work to cover living costs.<sup>63</sup>

However, there is a strong sense of purpose within the media, which means it continues to attract talent and ambition. In the same journalism survey, 65% of respondents said they would likely still be working as a journalist in five years. Companies are also creating purpose through social impact and socially-focused programmes. Penguin's Lit in Colour programme and report is supporting schools to introduce more books by authors of colour to students in England.<sup>64</sup> This is a critical part of the wider debate about inclusion and representation in education: 82% of youth survey respondents did not recall ever studying a text by a Black, Asian or minority ethnic author and no more than 7% of candidates for GCSE English Literature in 2019 answered on a full-length novel or play by a woman.<sup>65</sup>

# 82%

of survey respondents did not recall ever studying a text by a Black, Asian or minority ethnic author

60 Ofcom, *Equity, Diversity and Inclusion in Broadcasting*, November 2025, <https://www.ofcom.org.uk/siteassets/resources/documents/tv-radio-and-on-demand/diversity-and-equality/reports/2025/equity-diversity-and-inclusion-in-broadcasting-2024-25.pdf?v=408416>.

61 Dr Amy Ross Arguedas, Mitali Mukherjee and Prof. Rasmus Kleis Nielsen, *Race and leadership in the news media 2025: Evidence from five markets*, Reuters Institute, March 2025, p.4, <https://reutersinstitute.politics.ox.ac.uk/race-and-leadership-news-media-2025-evidence-five-markets>.

62 FT Strategies, *Diversity Inside Media Organisations: Trends 2024*, 2024, <https://www.ftstrategies.com/en-gb/insights/diversity-inside-media-organisations-report>.

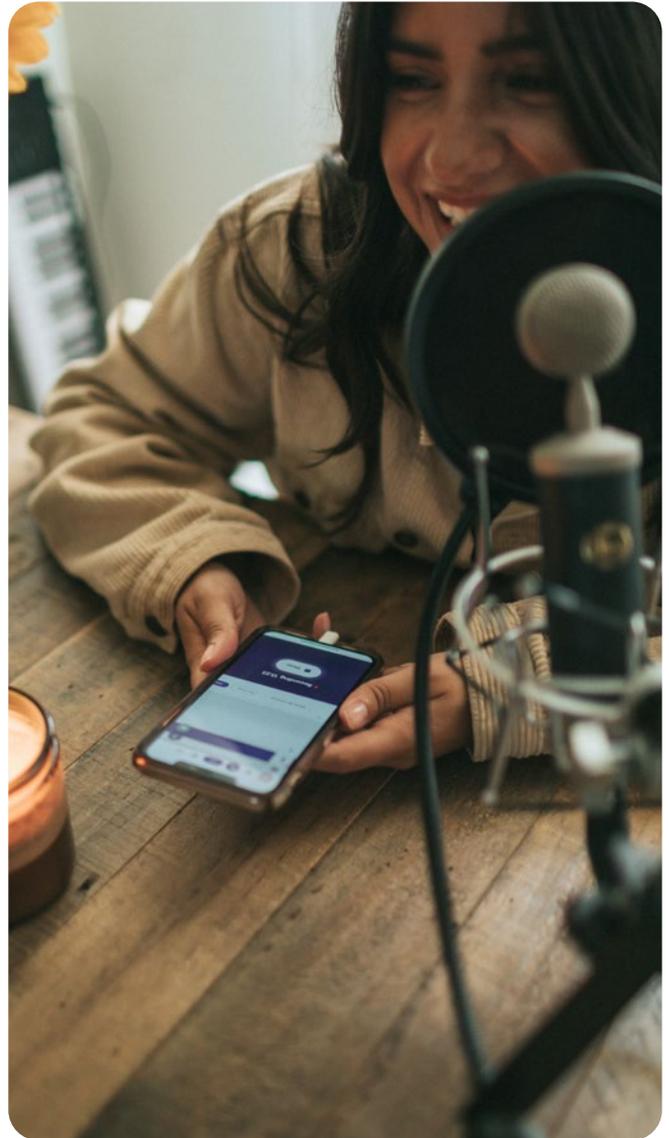
63 TakTak and Display Europe, *Results of the survey for journalists*, March 2025, (p.6-9), <https://taktak.media/wp-content/uploads/2025/03/Report-survey-results.pdf>.

64 Lit in Colour, <https://litincolour.penguin.co.uk/>.

65 Victoria Elliott et al., *Diversity in Literature in English Schools*, Lit in Colour, June 2021, p.6, <https://litincolour.penguin.co.uk/assets/Lit-in-Colour-research-report.pdf>.

## Diversity, equity and inclusion (DEI)

- Positive Impact(s):** hiring a diverse workforce (and providing fair and equal pay) and having high retention rates has a positive impact on employees, supporting their right to be themselves at work and contributing to higher job satisfaction. An IPSOS poll of the UK in April 2025 revealed strong support for DEI initiatives in the workplace, with 64% in support of training employees on how to be more inclusive and avoid discrimination.<sup>66</sup> Despite some companies scaling back DEI commitments based on changes to US regulation, DEI initiatives are shown to positively influence personal work experiences, as evidenced by a survey of over 1,000 US employees: 95% of respondents reported that DEI initiatives have positively impacted their experiences at work and 79% observed positive changes in company culture as a result of these initiatives.<sup>67</sup>
- Opportunity(ies):** clear purpose, culture, and strong, evidenced sustainability and DEI programmes can help to attract people to an organisation and retain them in the long-term. An Ofcom broadcasting report evidenced that companies in the UK prioritise this, with 80% having launched (or committed to a plan) targets in relation to retention and/or progression.<sup>60</sup> Similarly, a FT report on diversity in the Media (2024) states that over half of the respondents agreed that DEI is a strategic priority.<sup>62</sup> In addition, there is a widely-held view that diverse workforces result in better representation within content, and that this in turn is an opportunity for audience reach and growth. McKinsey's 2021 study on Black representation in film and TV found that in the US, addressing racial inequalities could provide the industry with an additional \$10 billion in annual revenue, which is 7% more than the \$148 billion assessed baseline.<sup>68</sup>



## Talent attraction and retention

- Opportunity(ies):** developing and training employees, and championing a fair and positive workplace, can help companies to attract and retain top talent, reduce turnover, enhance employee engagement, and improve productivity. Employees, particularly younger staff, are increasingly looking for purpose and value-driven work. Deloitte's annual survey on Gen-Z and Millennials found that in both groups, around 40–41% will reject a potential employer based on their personal ethics or beliefs and 44–45% have left a job because it lacked purpose.<sup>69</sup>

66 Rachel Ormston, *Ipsos poll finds widespread support for key workplace DEI initiatives, but men are more likely than women to say DEI has gone 'too far'*, IPSOS, April 2025, <https://www.ipsos.com/en-uk/ipsos-poll-finds-widespread-support-key-workplace-dei-initiatives-men-are-more-likely-women-say-dei>.

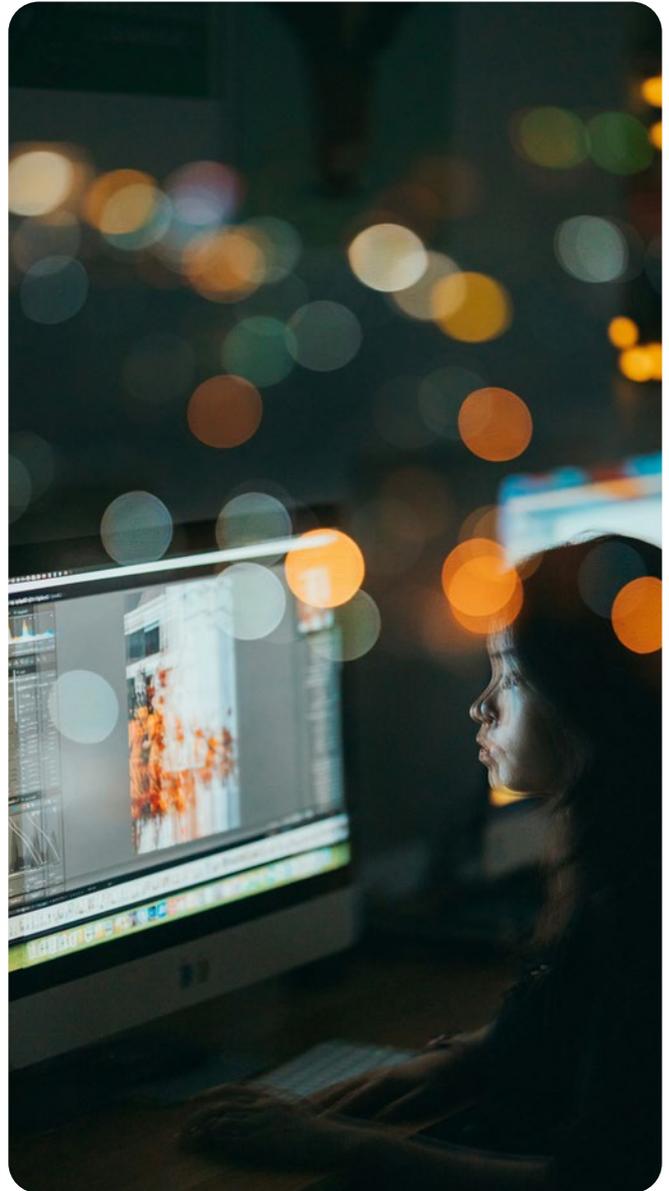
67 Jasmine Escalera, *DEI Rollbacks vs. Workplace Reality: 88% Say DEI Efforts Have Tangibly Improved Diversity*, My Perfect Resume, February 2025, <https://www.mypperfectresume.com/career-center/careers/basics/dei-impact#:~:text=Workplace%20Reality:%2088%25%20Say%20DEI,have%20increased%20diversity%20in%20leadership>.

68 Jonathan Dunn et al., *Black representation in film and TV: The challenges and impact of increasing diversity*, McKinsey, March 2021, <https://www.mckinsey.com/Featured-Insights/Diversity-and-Inclusion/Black-representation-in-film-and-TV-The-challenges-and-impact-of-increasing-diversity>.

69 Deloitte, *2025 Gen Z and Millennial Survey: Growth and the pursuit of money, meaning, and well-being*, 2025, <https://www.deloitte.com/content/dam/assets-shared/docs/campaigns/2025/2025-genz-millennial-survey.pdf>.

## Health, safety and wellbeing

- Negative Impact(s):** there are potential negative impacts on media employees in vulnerable roles. For example, journalists may suffer harassment and threats, especially online, or may travel with their teams to high-risk areas such as war zones and be at risk of physical harm, and in extreme cases, of death. There was also consensus that the potential negative impact of poor work-life balance and irregular work hours (e.g., those on set or on news desks) is material to media. These impacts can result in intense working conditions, which may negatively impact an employee's quality of life and health. A report by the TV Industry Human Rights Forum (TVIHRF) explored the negative impacts on health, safety and family life from inconsistent scheduling related to post-production in the UK.<sup>70</sup> It found that physical health may be impacted due to long hours in chairs doing repetitive work, and safety may be impacted whilst travelling home late at night, particularly for women, or driving home when excessively tired. Furthermore, long hours and lack of rest days can substantially impact family life, including access to social support and the ability to create and sustain meaningful relationships. According to the Tak Tak and Display survey, 43% of EU journalists cited 'bad work-life balance' and 27% cited 'unsafe situation for journalists in my country', when asked what challenges journalists face.<sup>63</sup>
- Risk(s):** an identified material risk, which links to many of the impacts above, was low retention and/or lower productivity levels as a result of burnout, low satisfaction and stress. Some external interviews highlighted the link between human health and productivity and climate change. Additionally, there is the risk from worsening mental health. The WHO estimates that depression and anxiety costs the global economy \$1 trillion per year, predominantly due to reduced productivity, and a Deloitte report on Mental Health and Employers estimated that poor mental health across the UK workforce could be costing employers £51 billion annually.<sup>71,72</sup> According to a report by The Creative Industries Independent Standards Authority (CIISA), poor mental health, discrimination, bullying and neglect reflect the highest levels of concern across creative industries, and around half have experienced discrimination, neglect and/or bullying (with discrimination found to be most prevalent in the Music industry; neglect in Theatre; and bullying in the TV and Film industry).<sup>73</sup>



# £51bn

– the estimated annual cost to UK employers due to poor mental health across the workforce, according to a Deloitte report on Mental Health and Employers

70 Amelia Knott, *Let's fix it in post: Why broadcasters and production companies can and should address human rights risks in post production*, TV Industry Human Rights Forum, January 2025, p.27, [https://www.tvhumanrights.org/\\_files/ugd/70ff11\\_8d38b966e8624d14bec21fd74f449459.pdf](https://www.tvhumanrights.org/_files/ugd/70ff11_8d38b966e8624d14bec21fd74f449459.pdf).

71 Vlad Dediu et al., *Mental health and employers: The case for employers to invest in supporting working parents and a mentally healthy workplace*, Deloitte, May 2024, p.16, <https://www.deloitte.com/uk/en/services/consulting/research/mental-health-and-employers-the-case-for-employers-to-invest-in-supporting-working-parents-and-a-mentally-healthy-workplace.html>.

72 World Health Organisation, *World mental health today: Latest data*, September 2025, p.29, <https://iris.who.int/server/api/core/bitstreams/31714489-1345-4439-8b37-6cbdc52e15ca/content>.

73 Creative Industries Independent Standards Authority, *Building the foundation for reporting harm in the creative industries*, 2025, p.4, <https://ciisa.org.uk/wp-content/uploads/2025/09/Building-foundation-reporting-harm-in-creative-industries.pdf>.

## Supply chain

In the 2022 report, the relevant material topic was Sustainable value chain, whilst Human rights and Treatment of freelancers emerged as strategic topics. Three years on, company action has matured considerably and the number of related material sub-topics has increased, but there is still a long way to go. Generally, these discussion points centre on company impacts rather than on risks or opportunities. This is reflected below in the material sub-topics: **Workers and human rights in the supply chain**, **Freelance workers** and **Child labour and forced labour in the supply chain**.

### Worker and human rights in the supply chain

- **Negative impact(s):** this refers to the potential negative impact on workers in the supply chain if any media company failed to uphold a decent and high standard of due diligence. Stakeholders also highlighted that the risks considerably increase for workers in the supply chain where visibility is reduced; for example, suppliers in Tier Two – those providing goods or services to a company's direct (Tier One) suppliers – and beyond, and temporary or sub-contracted staff and workers. For further information, reports such as the TVIHRF report on working conditions for cleaners, caterers, drivers and security provide deeper analysis for UK-based workers.<sup>74</sup> It is also worth noting that the scale and scope of these impacts will differ across media sub-sectors and geographies. For instance, the publishing industry is required to manage different upstream risks and impacts compared to a streaming platform, given its forestry-based upstream supply chain. The health and safety risks for upstream forestry workers is very high – a logging worker in the US has a fatal work injury rate of 91.7 per 100,000 full-time equivalent workers.<sup>75</sup>

Stakeholders also highlighted that the risks considerably increase for workers in the supply chain where visibility is reduced; for example ... temporary or sub-contracted staff and workers.



<sup>74</sup> Amelia Knott, Dr Jack Newsinger and Dr Nina Willment, *Every role matters: Working conditions for cleaners, drivers, caterers and security in UK TV productions*, TV Industry Human Rights Forum and University of Nottingham, June 2025, p.2, <https://www.tvhumanrights.org/research-ancillaryworkers2025>.

<sup>75</sup> S&P Global, *ESG Materiality Map: Paper and Forest Products*, October 2022, <https://www.spglobal.com/ratings/en/regulatory/delegate/getPDF?articleId=3151884&type=COMMENTS&defaultFormat=PDF>.

## Freelance workers

- Negative impact(s):** this topic has been present in many iterations of RMF materiality research over the years, given the number of freelancers in the media industry. This is supported by research across journalism and film and TV: the Tak Tak and Display survey of EU-based journalists found that 52% are freelancers or working under non-employment contracts;<sup>63</sup> a report in the US found that 34% of journalists identify as freelance or self-employed;<sup>76</sup> and in the UK, freelancers account for 41% of the film and video production workforce, compared to only 13% of the workforce as a whole.<sup>77</sup> A study by Arts Council England provides further intersectional considerations to this topic: 66.5% of freelancers in creative industries are women (and 2.8% non-binary); 71.3% identify as 'white'; and 62.3% come from 'higher' socio-economic status backgrounds.<sup>78</sup> Generally, freelancers tend to have fewer protections (including legal employment rights) than full-time employees and can be more exposed to labour and human rights violations. This could be in relation to payment delays and income uncertainty (leaving them less financially secure), and unpaid leave and sick leave (leaving them more vulnerable to health risks like burnout). This topic was further up-weighted following discussions with experts on the growing gig economy – a job market typically characterised by short-term or freelance work contracts – and the rising cost of living. The UK government's planned amendments to the Employment Rights Bill, which includes proposed changes to the rights of workers on zero-hours contracts, could improve the situation for freelancers, but is unlikely to significantly change the lived experiences for some.<sup>79,80</sup> There is also a related risk for organisations from a "talent pipeline crisis"; the Screen Industry Voices Report states that 68% of film and television workers in the UK are not currently working, with 37% planning to leave the industry in the next five years.<sup>77</sup>



## Child labour and forced labour in the supply chain

- Negative impact(s):** this topic was discussed in two ways. Firstly, the negative impact that any instance of child or forced labour in the supply chain would have on the affected individuals. Some sub-sector supply chains may also carry greater risks in relation to this topic, such as paper and forestry supply chains or technology-related supply chains (e.g., routers or TVs). For example, technology-related supply chains may involve mining upstream, which is widely known to carry systemic human rights risks. The second angle to this topic, which emerged through discussions with external experts, is child labour in media production (child actors, contestants etc.) and the required and necessary safeguarding that has to be in place. Generally speaking, the negative impacts were not considered to be that likely nor occurring at scale, although this area is under-researched. However, the nuances around high rates of acceptable child labour in media (e.g., child actors) means that it will be a very relevant topic for many media companies to consider in their own materiality assessments.

76 Emily Tomasik and Jeffrey Gottfried, *U.S. journalists' beats vary widely by gender and other factors*, Pew Research Center, April 2023, <https://www.pewresearch.org/short-reads/2023/04/04/us-journalists-beats-vary-widely-by-gender-and-other-factors/>.

77 Lisa Purse et al., *Freelancers: Building workforce resilience for growth in the film and television industries*, Screen Industry Voices, April 2025, p.10, [https://research.reading.ac.uk/screen-industry-voices/wp-content/uploads/sites/330/2025/04/Report\\_Freelancers\\_SIV\\_FINAL.pdf](https://research.reading.ac.uk/screen-industry-voices/wp-content/uploads/sites/330/2025/04/Report_Freelancers_SIV_FINAL.pdf).

78 Arts Council England, *Cultural Freelancers Study 2024*, 2024, p.26,32,35, <https://www.artscouncil.org.uk/developing-creativity-and-culture/supporting-individual-creative-and-cultural-practitioners/creative-and-cultural-freelancers-study>.

79 Department for Business and Trade, *Employment Rights Bill: factsheets*, UK Government, October 2024, <https://www.gov.uk/government/publications/employment-rights-bill-factsheets>.

80 The Guardian, *Brutal hours, tyrants and chest pains: a freelance producer on the reality of British TV*, November 2024, <https://www.theguardian.com/media/2024/nov/09/brutal-hours-tyrants-and-chest-pains-a-freelance-producer-on-the-reality-of-british-tv>.

## Consumers

The topic of consumers was looked at primarily through the lenses of **Product and consumer safety** and **Accessibility**. While media does not face the same product-related risks as other industries, such as the direct consumption of food and beverage products, it has emerged as a relevant and prescient topic, mostly in relation to content. Specifically, it refers to the responsibility of media companies to ensure no harm comes to customers from the use of products or services, including harmful content, as well as regulatory obligations, monitoring and reporting, and risk assessments. The sub-topic of **Accessibility** refers to media's responsibilities to consider the needs and requirements of those living with disabilities. Both topics were present in the 2022 report as operational rather than material topics, but in the last three years, the rapidly changing digital landscape has fundamentally changed the potential harms and risks consumers may face. Similarly, there is increasing awareness of digital poverty and digital exclusion, and the negative impacts that this can have on all age-groups, whether it is complete exclusion from content, loneliness, or access to education, to name a few.

A new report by Vodafone found that the digital transformation gap across Europe could cost the EU GDP €1.3 trillion by 2033 and could lead to poorer health, worse education and reduced trust in institutions.<sup>81</sup> The report also found that 44% of EU citizens lack basic digital skills and that last year, one in five households in rural areas had no 5G coverage.

# €1.3tn

— the potential cost to EU GDP by 2033 if Europe's digital transformation gap is not addressed, according to a new report by Vodafone



<sup>81</sup> Vodafone, *A Bridge Across Communities: How reversing digital exclusion can level up Europe and build political resilience*, 2025, p.1, [https://www.vodafone.com/~/\\_/media/Files/V/vodafone/corp/documents/a-bridge-across-communities2.pdf](https://www.vodafone.com/~/_/media/Files/V/vodafone/corp/documents/a-bridge-across-communities2.pdf).

## Product and consumer safety

- Negative impact(s):** this was a wider-ranging potential impact, which included potential harm to customers from faulty, broken or misused products (more relevant to those sub-sectors selling physical products, e.g., TVs, routers etc.), but also the protection of vulnerable consumers from harmful content. Ofcom research shows that some groups disproportionately face online harms in the UK: people living with disabilities (76%) are more likely than non-disabled internet users (64%) to experience online harms, and women are five times more likely to be the victims of intimate image abuse.<sup>82</sup> Furthermore, there is increasing concern around young people's access to online spaces and digital content, primarily due to the negative impact it has on their mental health. In December 2025, Australia became the first country to introduce a ban for social media for children under the age of 16, with the aim to protect the mental health and wellbeing of Australian children and teens.<sup>83</sup> This topic has been a thread throughout RMF discussions over the last three years.<sup>84</sup> Laura Bates, founder of the [Everyday Sexism Project](#), spoke to the RMF on the topic of online safety and gender equality in 2023. This included exploring the inherent features of online spaces which can help abuse to proliferate: online anonymity, ease of access and the barriers to removing content - often impossible as online content can spread so quickly. The online landscape is therefore rife with pathways to harmful or extreme content, and these can often start in seemingly 'normal' spaces online, e.g., comment sections on mainstream video platforms.

A rounded approach is needed to prevent harm, especially to children and vulnerable users. As discussed in a panel on digital safety at the RMF's 2025 Mirrors or Movers conference, media literacy and tools for parents and young people are essential to help them navigate internet safety. Although interventions like smartphone bans are becoming more popular in schools across the globe, they are not necessarily improving mental health and wellbeing amongst students, emphasising the need for a human rights-based approach to online safety, supported by age-appropriate design and education.<sup>85</sup>

# 76%

of people with disabilities are more likely than non-disabled internet users to experience online harms



<sup>82</sup> Ofcom, *Exploring Digital Disadvantage: Ofcom Response to Research Findings*, April 2025, p.2, <https://www.ofcom.org.uk/siteassets/resources/documents/internet-based-services/technology/research-digital-disadvantage/ofcom-response-to-digital-disadvantage-research.pdf?v=393694>.

<sup>83</sup> Australian Government, *Social media age restrictions*, December 2025, <https://www.esafety.gov.au/about-us/industry-regulation/social-media-age-restrictions>.

<sup>84</sup> With Laura Bates presenting on gender-based violence in the media at two RMF events (her most recent book is also relevant to this topic: *The New Age of Sexism: How the AI Revolution is Reinventing Misogyny*), and more recently a panel discussion on digital wellbeing and safety with [Virgin Media O2](#) on their tools for customers, [Internet Matters](#) on their research into keeping children safe online and the University of Birmingham on a recent [paper on smartphone bans](#). A recording of this session can be found [here](#).

<sup>85</sup> Vicky A Goodyear et al., *Approaches to children's smartphone and social media use must go beyond bans*, University of Birmingham, March 2025, <https://research.birmingham.ac.uk/en/publications/approaches-to-childrens-smartphone-and-social-media-use-must-go-b/>.

## Accessibility

- **Positive impact(s):** creating and sharing content that is inclusive of people with disabilities – for example, sign language interpreters on screen, accessible web pages or audio description – ensures that content is accessible by everyone. This can be in the form of service and product design, such as ITV's 'Signed – BSL' (British Sign Language) navigation category on their platforms (except web browsers) and the Audio Description (AD) option. Many organisations are also raising awareness through content, such as the BBC show, *Reunion* – a bilingual thriller in both BSL and spoken English – or Rose Ayling-Ellis' BAFTA award-winning 'silent dance' on *Strictly Come Dancing*. There is also increasing regulation to help standardise requirements and improve accessibility, such as the European Accessibility Act (effective June 2025).<sup>86</sup> Whilst this was primarily seen as an area where media can have a positive impact, there are still improvements that can and must be made. The recent UK Covid Enquiry report found that "the needs of 80,000 deaf people in the UK whose first language is BSL were not properly considered in UK government communications" (broadcast via all the main news channels), potentially putting them at risk of missing critical information in relation to their health and safety.<sup>87</sup>
- **Negative impact(s):** the cost-of-living crisis and widening poverty gap is limiting many people's access to verified and accurate content. Digitising content is not a silver-bullet solution either, as digital poverty means many do not have the tools (such as phones, tablets and laptops) to access it. World Economic Forum research found that in 2022, 2.4% of the 450 million EU inhabitants could not afford internet connection; this rises to 7.6% of those considered at risk of poverty.<sup>88</sup> In the UK, a 2025 Ofcom report found that over two and a half million people do not have access to the internet and just over two million that do are reliant on legacy technology (connected via 2G or 3G), which limits what they can do.<sup>82</sup> This is also affecting children's access to learning and education as 8% of children aged five to fifteen in the UK do not have access to an internet-enabled desktop computer, laptop or netbook at home.<sup>89</sup> Furthermore, the increasing numbers of paywalls, subscription costs and price increases could further limit accessibility for many groups.

## Responsible marketing

In the 2022 report, *Responsible marketing* was in the strategic category, but in this latest iteration, it has been deemed material. This is driven by increasing concerns around misinformation and declining trust in the media and advertising. It is also increasingly topical in relation to misleading environmental marketing, specifically greenwashing. In 2025, RMF participants received a training session from Gen-R law on what good governance looks like to help mitigate the chances of greenwashing.

**Responsible marketing** was discussed through the lens of potential negative impacts and some of the risks a company might face if they are found to be misleading audiences and consumers. It also emerged as a potential opportunity, since a successful marketing strategy can increase audience and consumer trust. However, at present, only the negative impacts were deemed material.

## Responsible marketing

- **Negative impact(s):** misleading marketing can potentially lead to consumer confusion and/or the promotion of certain products which can negatively impact society, e.g., gambling adverts. The discussion also touched on the potential negative impacts of 'greenwashing', which can mislead consumers into buying products/services based on unfounded sustainability claims. Whilst this did not emerge as a material risk – partly due to the ongoing back-and-forth over regulation, such as the EU Green Claims Directive – it is worth noting that relevant regulation is increasing overall and companies are facing increasing scrutiny, particularly consumer-facing companies. In many countries, greenwashing is already explicitly regulated to some degree, for example via the CMA in the UK and via the Empowering Consumers for the Green Transition Directive in the EU.<sup>90,91</sup>

86 European Commission, *European Accessibility Act*, accessed 17th November 2025, [https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/disability/union-equality-strategy-rights-persons-disabilities-2021-2030/european-accessibility-act\\_en](https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/disability/union-equality-strategy-rights-persons-disabilities-2021-2030/european-accessibility-act_en).

87 The Rt Hon the Baroness Hallett DBE, *UK Covid-19 Inquiry*, 2025, p.186, [https://covid19.public-inquiry.uk/wp-content/uploads/2025/11/18102920/1435-HH-E03296643\\_UK-Covid-19-M2-%E2%80%A2%E2%80%A2-Inquiry\\_Volume-II\\_Accessible.pdf](https://covid19.public-inquiry.uk/wp-content/uploads/2025/11/18102920/1435-HH-E03296643_UK-Covid-19-M2-%E2%80%A2%E2%80%A2-Inquiry_Volume-II_Accessible.pdf).

88 Vidhi Bhatia, *Bridging the digital divide in the European Union*, World Economic Forum, August 2023, <https://www.weforum.org/stories/2023/08/how-to-bridge-the-digital-divide-in-the-eu/>.

89 Carnegie UK Trust and UK Committee for UNICEF, *Closing the Digital Divide for Good: An end to the digital exclusion of children and young people in the UK*, June 2021, p.4, [https://www.unicef.org.uk/wp-content/uploads/2021/06/Closing-the-Digital-Divide-for-Good\\_FINAL.pdf](https://www.unicef.org.uk/wp-content/uploads/2021/06/Closing-the-Digital-Divide-for-Good_FINAL.pdf).

90 CMA, *Green claims code: making environmental claims*, September 2021, UK Government, <https://www.gov.uk/government/publications/green-claims-code-making-environmental-claims>.

91 EUR-Lex, *Directive (EU) 2024/825 of the European Parliament and of the Council of 28 February 2024 amending Directives 2005/29/EC and 2011/83/EU as regards empowering consumers for the green transition through better protection against unfair practices and through better information*, 2024, <https://eur-lex.europa.eu/eli/dir/2024/825/oj/eng>.



## Governance

## Data

Unsurprisingly, Data privacy and Cybersecurity remained material topics (consistent with the 2022 report). Media companies regularly handle personal consumer data and for public broadcasters, there are some new regulatory requirements on how they need to manage data breaches. For example, the UK government has said it wants to ban public sector bodies and operators of critical national infrastructure from paying ransom demands.<sup>92</sup> This was a situation faced by the British Library when it was targeted in a large-scale ransomware attack in 2023. Furthermore, consumers remain concerned about how their data is managed and protected by companies, despite the higher standards for data protection set by regulation, like the EU and UK General Data Protection Regulation (GDPR). In a related Deloitte report, only 34% of US-based respondents to their survey felt that companies are transparent about how they use the data they collect from online services.<sup>93</sup>

The sub-topics **Data protection and data privacy** and **Cybersecurity** emerged as material from a financial lens based on the following risks:

### Data protection and data privacy

- **Risk(s):** any loss of data will impact people's right to privacy. It can erode trust in a business and damage reputation, as well as lead to potential legal liabilities and regulatory fines. This could also impact the industry's access to data, which is heavily relied upon for targeted content and advertising.

# 34%

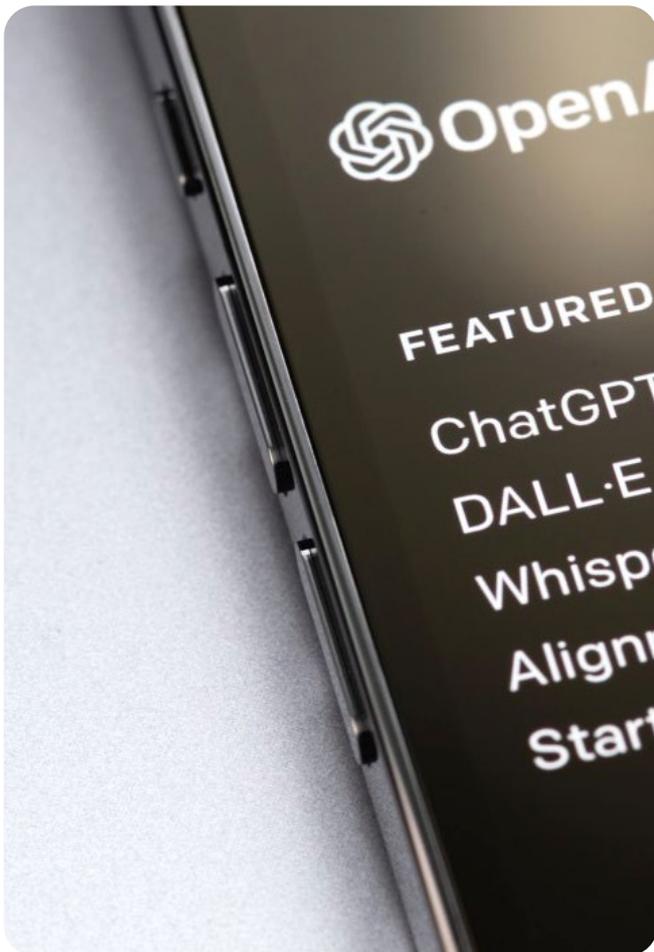
– the proportion of US-based survey respondents who felt that companies are transparent about how they use data collected from online services, according to a related Deloitte report

<sup>92</sup> Home Office, National Cyber Security Centre and Dan Jarvis MBE MP, *UK to lead crackdown on cyber criminals with ransomware measures*, UK Government, July 2025, <https://www.gov.uk/government/news/uk-to-lead-crackdown-on-cyber-criminals-with-ransomware-measures>.

<sup>93</sup> Jana Arbanas et al., *Data privacy and security worries are on the rise, while trust is down*, Deloitte, September 2023, <https://www.deloitte.com/us/en/insights/industry/telecommunications/connectivity-mobile-trends-survey/2023/data-privacy-and-security.html>.

## Cybersecurity

- **Risk(s):** any cyber-attack could severely disrupt operations, including the output of content, leading to direct revenue impact. It could also lead to cases of intellectual property theft, long-term operational disruptions, financial losses and liabilities, and reputational damage, ultimately compromising consumer trust. Research by ISACA indicates that 78% of surveyed US industry professionals rank reputational impact as the top concern for cyber-attacks.<sup>94</sup> In the case of ransomware attacks, there may also be immediate costs to the business. Media companies are potential targets for cyber-attacks as they are often very public-facing and serve as primary platforms for information sharing.<sup>95</sup> An attempted attack on Virgin Media Television in 2023 meant some of its programming was affected and forced off-air while the company managed the incident, demonstrating how even attempted cyber-attacks can have significant consequences.<sup>96</sup>



## Governance

Within governance, there are many 'good hygiene' topics that businesses manage day-to-day, such as anti-bribery and corruption, anti-competitive practices or finance and tax management. The discussions around governance therefore tended to focus on 'above and beyond' impact and it was the **Responsible management of suppliers and corporate partners** which emerged as material.

An emerging topic was Organisational structure, specifically the potential constraints on the independence of media due to ownership structures. Furthermore, there is a risk that the recent acceleration of major acquisitions and consolidation across the media sector could lead to more homogenised content outputs and potentially push independents and smaller companies further into the fringes. Links were also made in discussions between company governance and how to manage potential risks to freedom of expression (see the sector-specific section of this report, [p.11](#)).

### Responsible supplier and corporate partner management

- **Positive impact(s):** considered and responsible management of suppliers and corporate partners can foster innovation, promote sustainability, improve supply chain resilience, increase operational efficiency, and can contribute to overall economic growth. In turn, these have potential benefits to society, due to better products, services, and responsible business practices. In Edelman's 2025 Trust Barometer, which cites the 'Crisis of Grievance', the report calls out the need for businesses, governments, media, and NGOs to work together to address the root causes of grievance and enable trust, growth and prosperity.<sup>97</sup>

<sup>94</sup> ISACA, *State of Cybersecurity: Reputational Damage from Attacks Tops List of Concerns*, July 2021, <https://www.isaca.org/resources/news-and-trends/newsletters/atisaca/2021/volume-23/state-of-cybersecurity-reputational-damage-from-attacks-tops-list-of-concerns>.

<sup>95</sup> James Coker, *Cyber-Attacks in the Media Industry Making Headlines*, Infosecurity Magazine, March 2023, <https://www.infosecurity-magazine.com/news-features/cyber-attacks-media-industry/>.

<sup>96</sup> RTE, *Investigation under way after cyber attack at Virgin Media Television*, February 2023, <https://www.rte.ie/news/2023/0220/1357832-virgin-media-hack/>.

<sup>97</sup> Edelman Trust Institute, *2025 Edelman Trust Barometer: Global Report: Trust and the Crisis of Grievance*, 2025, p.37, <https://edl.mn/4iPYef>.

# Conclusion

The introduction of the double materiality assessment has changed the way media companies look at sustainability-related issues by explicitly requiring them to consider their 'inside-out' impact on people and the planet.

Throughout this research, the theme of trust and the value of media has been at the forefront of all the discussions. Content remains the vital sustainability topic for media, in particular the importance of diverse representation through content; high-quality, independent content that honours and protects freedom of expression; and the ultimate responsibility media companies have to consider the potential negative impacts of content, such as misinformation and harmful sentiment. The challenge that remains is how to measure this impact and how these impacts differ between media sub-sectors.

The conversation around the digital transition was very pertinent amidst the rapid uptake of technologies, specifically generative AI and large-language models (LLMs). Media companies face the pressing challenge of engaging audiences as they increasingly move away from 'traditional' platforms and content, and of protecting their intellectual and creative property. Whilst AI is considered an opportunity by many and adoption is increasing rapidly, it is imperative that companies understand how to responsibly integrate it into their systems and mitigate AI-related risks.

The need for climate action remains important to every stakeholder involved in the report. There was a greater focus this year on climate mitigation as the window to limit global warming to safe levels is nearly closed, and the consequences of inaction become ever greater and more visible.

Despite the turbulence of the last year, DEI remains a priority topic for the sector. Media companies are committed to creating a safe and inclusive environment for employees to thrive and to support their wellbeing. Similarly, there is growing awareness of the human rights impacts which are present in the media industry, particularly the risks to workers in the supply chain and freelance workers.

The media sector is at the forefront of society's pressing challenges: declining trust, increasingly polarised politics and partisan action, and rapid digital transformation. In the face of this changing landscape, media's responsibility to provide trusted and quality content is more important than ever – its superpower is a powerful tool to help society navigate its way forward.

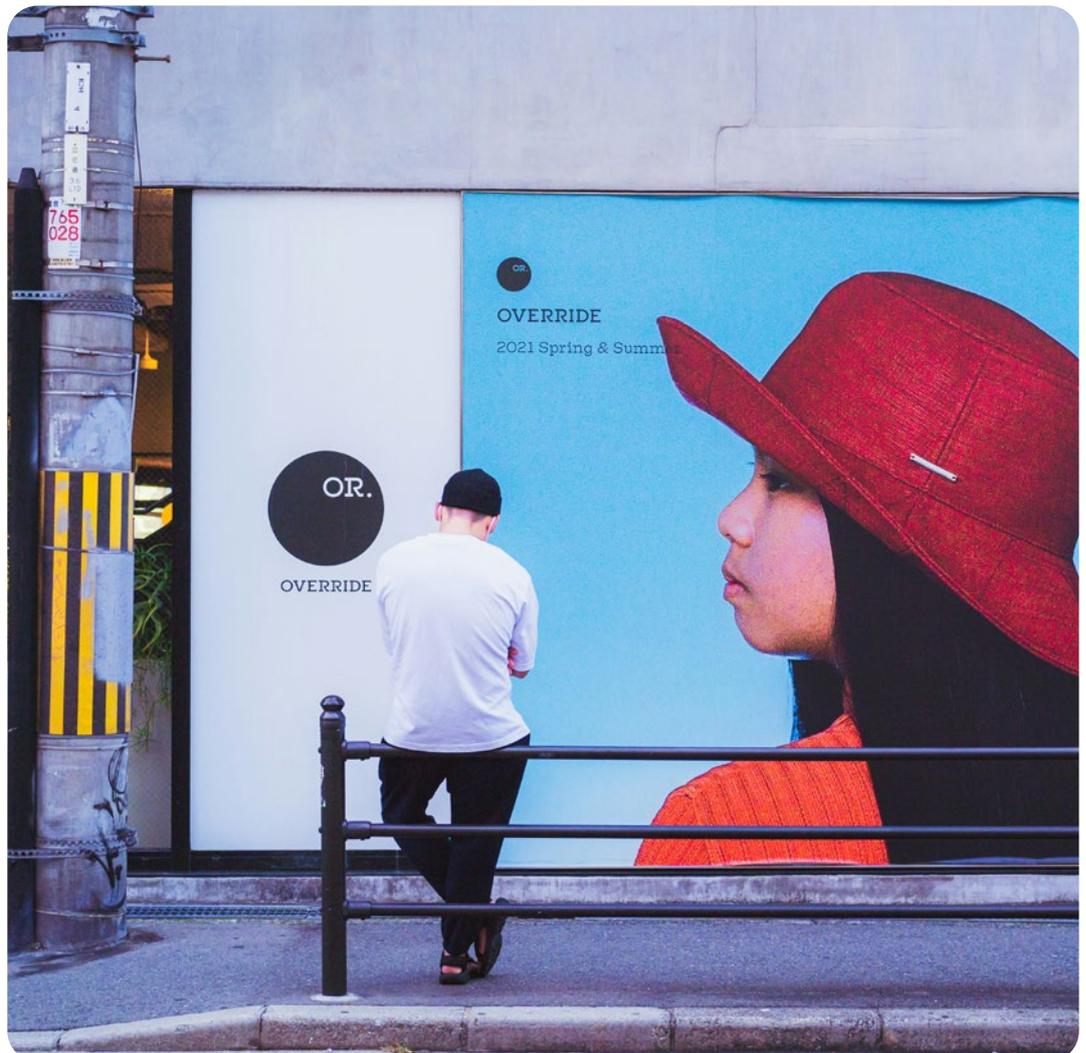
The RMF will continue to monitor the dynamic media landscape and facilitate collaborations which help to connect the dots, build bridges, and bring the sector together.

**Throughout this research, the theme of trust and the value of media has been at the forefront of all the discussions.**

# Appendix A

## Sources of the long list of topics

- [DJSI S&P Global ESG Materiality Map – Paper and Paper Products](#)
- [DJSI S&P Global ESG Materiality Map – Media and Entertainment](#)
- [Publishing Declares](#)
- [UN SDG Publishers Compact](#)
- [EU Corporate Sustainability Due Diligence Directive \(CSDDD\)](#)
- [The EU European Financial Reporting Advisory Group’s \(EFRAG’s\) European Sustainability Reporting Standards \(ESRS\)](#) (original standards were used as this research was conducted prior to the new draft standards being released in 2025).
- [Media Materiality 2022 \(RMF\)](#)
- [Bafta albert Climate Content Report](#)
- [Bafta albert 2023 Report](#)
- [Ad Net Zero Guide to Sustainable Media](#)
- [DIMPACT Methodology](#)





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