



BBC response to Ofcom's Media plurality measurement framework – call for inputs

27 November 2014

Introduction

1. The BBC welcomes the Government's decision to request Ofcom to develop a suitable set of indicators for a media plurality measurement framework. The Secretary of State's letter highlights that Ofcom has already conducted valuable work in this area; and the Government's decision to set out the request at a high level ensures that Ofcom is in a position to proceed independently to devise the framework of indicators and metrics, in consultation with industry. We look forward to seeing Ofcom's proposals for a set of suitable indicators for the measurement framework and responding to the consultation to follow.

Summary

2. The BBC's view is that Ofcom's 2012 advice contains useful building blocks for the construction of a plurality measurement framework. However, the precise design of the framework needs to take account of changes in the news sector since 2012 and must, above all, be fit for purpose – to provide the basis for undertaking a plurality assessment at a later date. There are a number of key points to raise as Ofcom develops its proposals for consultation.
3. First, important developments in the news sector have progressed since 2012, particularly online. An influx of new entrants to the news market has led to increased availability of online news around the world, especially in English-language markets where global brands with English variants are numerous. These include domestic and international suppliers of general and specialist news – supplemented both by a growing role played by social media which has enabled citizen journalism and by digital native start-ups (eg. Buzzfeed, Vox, the Intercept). Overall, today's level of choice and plurality has never been greater – there are more stories out there, more ways of telling them, more ways of reaching people. As a result, the starting point for any plurality assessment, we believe, must be an analysis of the number of different voices – measured across platforms – available to consumers in any market. Availability leads to choice and, regardless of actual scale of consumption, can ensure that a range of ideas are circulated and that scope exists for alternative views and perspectives to be presented. Barriers to multi-sourcing have never been lower, particularly online. Digital media mean that stories from relatively obscure sources can quickly become common currency of debate. It is important, therefore, that availability metrics are given due weight relative to consumption and impact metrics in Ofcom's proposals for a plurality measurement framework.
4. Another major theme of developments in the news sector since 2012 is the success of UK providers seizing global opportunities made possible by internet distribution. The UK boasts two of the top three newspaper websites in the world – The Daily Mail and Guardian, alongside other global leaders like the BBC, FT and Economist. These positive developments represent an important and relevant set of considerations, influencing the prospects for plurality in the UK. Ofcom should ensure that they can be properly captured by the plurality measurement framework that it has now been asked to propose.
5. Second, Ofcom's advice on plurality indicators centres on availability, consumption and impact. A repeated theme of the advice is the need to complement analysis of these indicators by exercising judgement, particularly where there may be methodological challenges to researching complex phenomena like cross-platform consumption and impact on opinion-formation. The BBC supports the use of qualitative judgement to mitigate

reliability concerns with quantitative methodologies. However, as part of the next phase of its work, Ofcom should consider further targeted exploratory research into the development of metrics capable of answering the risks potentially associated with 'share of references' measures and impact statements, for example. There may be innovative, less conventional techniques worth exploring and which, at a minimum, may inform improvements to Ofcom's 2012 proposals, before settling on proxies or metrics which risk being flawed.

6. Finally, Ofcom's 2012 advice also suggested that it would be important to ensure that a plurality assessment based on quantitative measures (availability, consumption, impact) could be set in the wider context within which news providers actually operate – from internal governance processes to editorial policy and impartiality requirements. These factors also help to provide an account of the chain of causality behind the way people use different news providers for different purposes. For example, the correlation between the regulatory framework around broadcast requiring impartiality and a lead on attributes such as 'trustworthiness' and 'accuracy' is key to concluding whether numbers generated by consumption and impact metrics raise any problems for plurality in an overall assessment. However, the risk of establishing these considerations as merely contextual to the core measurement framework (Ofcom describes them as 'contextual factors') is that they appear marginal to the purpose for which the measurement framework is being developed – to provide the basis for a plurality assessment. An important area for development, therefore – and an important task for Ofcom in coming forward with its proposals at the next stage of this process – is to clarify not just which quantitative metrics are 'in' on a sensible basis, but how the indicators and metrics should inform an overall assessment given a wider set of relevant considerations. Ofcom's 'contextual factors' are fundamental to any plurality measurement framework.
7. The BBC's responses to the 12 questions posed in Ofcom's Call for Inputs are set out below.

Answers to questions posed in Ofcom's call for inputs

Building on Ofcom's 2012 advice

- *How should we develop the indicators we set out in our 2012 advice on measuring plurality to address the Secretary of State's request for a media plurality measurement framework? Are there other metrics that should be added to those we outlined in our 2012 advice?*
 - *Are 'share of references' indicators appropriate to measure cross-platform media consumption? In addition to 'share of references' indicators, are there other metrics of particular relevance to measuring cross-media news and current affairs consumption? What are their pros and cons?*
8. The BBC has set out a detailed position on media plurality in our submissions to Ofcom's Measuring Media Plurality report, to the House of Lords Communications Committee's inquiry into Media Plurality and to the Government's Media Ownership and Plurality consultation. The BBC's view continues to be that measuring media plurality cannot be confined to any single measure but should reflect a range of key metrics and factors. We

welcome the Government's decision to call for a set of suitable indicators and we endorse Ofcom's 2012 advice "that a plurality assessment must make use of a basket of measures."¹

9. The 2012 advice centred around three categories of quantitative measures (availability, consumption and impact), to be monitored alongside a qualitative consideration of relevant 'contextual' factors. The BBC's view is that certain metrics may pose avoidable risks and that this may point to a role for research to inform specific targeted improvements and development. Accordingly, we set out specific proposals for further development throughout this response.
10. On the 'share of references' indicator, while the BBC welcomes the aim to measure plurality across platforms, including online, it is important that the measure, if included in Ofcom's proposals for a measurement framework as it recommended in 2012, is not deployed or interpreted uncritically. There are two key risks; one associated with its use as a measure of cross-platform consumption; the other with its use as a proxy for influence.
11. First, as a measure of consumption, 'share of references' succumbs to the risks generally associated with methods reliant on people's ability to give an accurate account of their behaviour. It "is calculated by asking people which sources of news they use 'nowadays', and how frequently they use them,"² reflecting, as a result, consciously recalled rather than actual consumption. This risks overstating the share of consumption generated by salient 'top-of-mind' providers over those less easily recalled, as well as in comparison to less mindful behaviour. Saliency, for example, may not only be due to consumption of a provider's news and current affairs content nowadays but also to its long-standing popularity and wider presence across a range of genres and services. Less mindful behaviour may characterise, for example, incidental consumption on radio or through occasional visits to particular providers through the reading of links posted on social media. In these cases, the editorial source may go unnoticed or not be supposed relevant as 'a source of news they use', albeit that for the purposes of measuring plurality, it should be. The important point is that even though the 'share of references' metric was developed in order to measure cross-platform consumption in a fragmenting sector, it nonetheless risks overstating the consumption generated by established providers in traditional media.
12. A second risk attached to the 'share of references' indicator is the potential for giving a misleading impression about impact and influence in the news market. In its 2012 advice, Ofcom suggested that consumption metrics should form the foundation of a plurality assessment and that 'share of references' in particular, along with sector-specific consumption metrics, "is a good proxy for measuring influence in the news media market."³
13. However, by focussing on recalled consumption, the 'share of references' measure risks providing an assessment of plurality blind to two key factors: first, the chain of causality

¹ Ofcom, Measuring media plurality, Ofcom's advice to the Secretary of State for Culture, Olympics, Media and Sport. 19 June 2012.

² Ofcom, News consumption in the UK: 2014 Report. June 2014.

³ Op. cit.

behind consumption; and second, the variety of factors beyond consumption which generate a provider's ability to influence. On the first point, Ofcom's 2012 advice was emphatic that "television is by far the most consumed and the most trusted medium," adding that "it is required to be impartial" on a regulatory basis.⁴ However, the chain of causality that runs from broadcasters upholding standards of impartiality to high public trust and high levels of consumption risks getting lost in a measure that focuses only on the consumption numbers. On the second point, Ofcom's 2012 advice also went into detail about the ways in which different regulatory frameworks and roles in agenda setting affect influence in news, neither of which is taken into account by the 'share of references' measure. Taking print media as an example, Ofcom noted that:

"Other, non-quantitative factors point to the continued significance of print media. Their ability to be partial, combined with the power of the written word (and headlines in particular) gives this medium in our view significant impact and influence. Historically newspapers have also played a role in setting the day's agenda for other media to draw from and they are – and are likely to remain in some form - a crucial component of the symbiotic relationship between the different mediums in the news value chain."⁵

14. Both of these issues with 'share of references' – a focus on recalled consumption without giving account to people's reasons for using different sources or to wider factors affecting influence in the news market – make it an imperfect measure of cross-platform consumption, an imperfect proxy for influence and at risk of overstating the relative influence of providers of television news.
15. In the BBC's view, these risks do not lead to the conclusion that the 'share of references' indicator would be an inappropriate measure of cross-platform media consumption. However, it does show that there would be merit in Ofcom undertaking further work to assess the potential for developing alternatives capable of mitigating or avoiding these risks. Ofcom may consider that 'share of references' is likely to be 'as good as it gets' and that a search for an (objectively) perfect mix of indicators for measuring plurality in news and current affairs will be in vain. In that case, this analysis underlines the crucial point that the 'share of references' measure has to be assessed in the round, analysed alongside other metrics as well as a consideration of relevant contextual factors without which it is not possible to make sense of the numbers. These wider factors are not merely contextual to an assessment of plurality but should be incorporated at the core of Ofcom's proposals. The important point is that the qualitative dimension and the task of reconciling the analysis of metrics with so-called 'contextual factors' is not a marginal part of the exercise. It is a fundamental part of any plurality measurement framework.
16. In terms of other measures of cross-media consumption, we previously stated in our submission to Ofcom's 2012 Measuring Media Plurality report that the BBC has considerable

⁴ Op. cit.

⁵ Op. cit.

experience in the field of measurement across media, not least through the Cross-Media Insight survey, which may be of help to Ofcom as it takes its thinking forward

Relevant market developments

- *Are there developments that have had a significant influence on the most appropriate ways to measure plurality in the UK since 2012? How do these developments affect the way in which plurality could be measured? Please provide evidence in support of your views*

17. A healthy sector should display a plurality of news supply offering a diverse and wide range of views, and that no single news provider can exert undue influence over political discourse or control the news agenda. However, a well-resourced and healthy news sector should also display the following characteristics:

- news media that reach and are consumed by a significant number of readers, viewers and listeners and are trusted;
- the accurate, fair and balanced reporting of events and high quality journalism which holds powerful interests to account;
- sufficiently low barriers to entry and competition between providers that spurs quality and innovation in the gathering and dissemination of news;
- overall investment at a level sufficient to guarantee high quality coverage, including extensive newsgathering and investigative journalism;
- a variety of ownership and governance structures to safeguard editorial standards and institutional plurality.

Policy-makers should adopt a balanced approach to these objectives.

18. Since 2012 there have been some important developments in the provision of online news with respect to these wider, relevant considerations.⁶ The major theme is the success of UK providers seizing global opportunities made possible by internet distribution. For example:

- The UK is among the most successful online news markets in the world, giving UK audiences unprecedented choice and acting as a great British export. The UK boasts two of the top three newspaper websites in the world – The Daily Mail and Guardian, alongside other global leaders like the BBC, FT and Economist.
- This not to say that some traditional business models aren't under pressure from structural change. This is a global trend; newspapers are facing similar challenges in international markets, whether there is a strong PSB online presence or not. Indeed, the BBC is an important part of the UK market's

⁶ New BBC research and analysis on this subject will be made available shortly.

success: its website is a reason why around one-in-ten Britons claim they went online in the first place. This success is now translating into growing, diversified revenues for news online.

19. While much attention is devoted in Ofcom's 2012 advice to the pros and cons of availability, consumption and impact metrics, it would be instructive for Ofcom in its forthcoming proposals to go further and clarify how it would plan to include an examination of these wider trends and market developments within the measurement framework. These insights have important implications for understanding the causes and prospects of plural outcomes on the supply-side of the news sector, and therefore underline the importance of giving this sort of analysis due weight alongside any other indicators.

The growing role of online news and its measurement

- *What are the relevant metrics to quantify the use of online news and current affairs? What are their pros and cons?*
 - *Does the ongoing evolution of online news consumption create challenges for measuring plurality? How should a measurement framework seek to address these?*
20. In addition to the points raised above about market developments on the supply side, there are important characteristics to keep under review with respect to consumption. People get their news diet from a range of sources, and barriers to multi-sourcing particularly online are lower than ever before. The scale of multi-sourcing and people's reasons for using different sources help to contextualise and provide an account of the chain of causality behind consumption and impact data.⁷ For example, the correlation between the regulatory framework around broadcast requiring impartiality and a lead on attributes such as 'trustworthiness' and 'accuracy' is key to understanding the numbers generated by consumption and impact of broadcast news. Ofcom should ensure that indicators for both multi-sourcing and for the reasons people use a variety of different sources are captured within its proposals for a plurality measurement framework.
 21. Monitoring this will be a critical part of any future plurality assessment because it will allow for two key pieces of analysis. First, it may capture a changing and wider definition of news on the consumption side, with different providers accounting for greater consumption – and potentially wielding greater influence – with respect to people's different reasons for consuming news. Second, it will ensure that a future plurality assessment gives account to a fuller and more complex picture of interactions with news providers – one which includes not just an indication of each provider's share of consumption, for example, but the chain of causality which drives that share as well. This would help provide a bridge between quantitative consumption metrics on the one hand, and the qualitative assessment of 'contextual factors' like impartiality regulation, on the other. As such, it will help guard

⁷ New BBC research and analysis on this subject will be made available shortly.

against the possibility that quantitative metrics are allowed uncritically to read across to misleading conclusions about threats to plurality.

22. In addition to these suggested developments to Ofcom's framework for measuring plurality, there are also other phenomena which Ofcom should ensure its proposed framework is able to capture, particularly online. Digital intermediaries (broadly categorised as news aggregators, search engines, social media and digital stores/devices) will play an increasingly significant role in the news ecology, with trends indicating that their impact is being scaled up with increasing rapidity: whilst it took television 13 years to reach 50m households, Facebook took just a year to hit 50m users and Twitter just nine months.
23. Intermediaries are a key way of accessing online news. 29% of online news users use search engines as one of the main ways they access news, 22% use news aggregators, and 17% use social media.⁸ As outlined in a recent Reuters Institute report⁹ this activity could potentially have an impact on plurality in four key areas: (1) control over what might be considered distribution bottlenecks through which users access news; (2) the editorial-like judgements they make about the news content they link to or carry; (3) their role in shaping future economic models for news provision; (4) their inclination and ability to influence the political agenda. Equally, there may also be a positive impact on plurality provided by digital intermediaries such as driving increased multi-sourcing and improved access to a wider variety of news. Ofcom's proposals for a framework for measuring media plurality would need to capture these areas of impact and monitor the evolution of digital intermediaries.

Standard industry measurements

- *What role should the sector-specific industry measurement systems play in a framework for measuring media plurality?*
24. In the BBC's view, it is important that sector-specific industry measurement systems complement Ofcom's proposals for a cross-platform metric of consumption. There are well-known challenges associated with aggregating sector-specific data into a cross-platform measure as doing so would mix different measurement systems and methodologies (BARB/Comscore, consumer research for NRS/RAJAR). It would also mix output that is all news (eg. TV news bulletins) with output that is a mix of news and other items (eg. time with newspapers can be reading the news, but can also be doing the crossword or checking job ads). Finally, it is not clear that one minute of news on radio = one minute on TV = one minute of newspaper consumption.
 25. However, in spite of the difficulties aggregating sector-specific measurement systems into a cross-platform measure, the BBC believes that they should be included in Ofcom's proposals in order provide an important check and balance within the overall framework. In light of the risks raised earlier about some cross-platform metrics' reliance on conscious recall, the

⁸ Reuters Institute Digital News Report 2014

⁹ News Plurality in a Digital World, Reuters Institute for the Study of Journalism 2012

benefit of a number of sector-specific measurement systems lies in their greater focus on actual consumption.

Measuring impact

- *In addition to the proxies we identified in 2012, are there other indicators which could contribute to a more reliable measurement of impact and influence of news provision on public opinion? What are their pros and cons?*
26. In its 2012 advice, Ofcom recognised the methodological challenges in measuring impact, concluding that “proxies of impact (and particularly perceived ‘importance’) should play a part of a broader assessment of plurality, noting that they are imperfect because one can only measure people’s conscious articulation and not actual effects.”¹⁰ One of the key proxies highlighted in the Call for Inputs is a survey-based indicator of ‘personal importance’, whereby people report how important a particular provider is to them when using news. This metric was developed through a piece of work that Ofcom commissioned from Kantar Media.¹¹
27. The BBC agrees with Ofcom about the caution required in assessing impact. Measuring impact directly is extremely challenging due to the complex interactions between a vast array of factors influencing each individual’s opinions. However, while their implementation may be more practical, using indirect proxies such as the ‘personal importance’ measure also carries a range of risks, from over-reliance on people’s potentially inaccurate accounts to replicating consumption data without adding new insight. On the latter point, Kantar Media’s research indicated “that importance as a news source is not necessarily correlated to market size” as instances were found where the importance of a smaller news provider outweighed that of its larger counterparts. However, their analysis of personal importance of different platforms did show that “claimed importance for the platform ... broadly corresponds with consumption”. This shows that in coming forward with its proposals, Ofcom will need to navigate the risk of including a statement as an impact metric which to a large extent may only act as a proxy for consumption.
28. The BBC’s view is that these risks do not mean importance statements and other similar research methodologies are necessarily inappropriate proxies for impact. However, it does show that there would be merit in Ofcom undertaking further work to assess the potential for developing ways of mitigating or avoiding these risks. This might include consideration of different, more innovative techniques ranging from ethnography to the use of big data and so on. Less traditional techniques may provide a more useful, richer picture of impact, particularly given developments in the provision and consumption in non-traditional online media since 2012. At a minimum, this work could inform refinements to the broad impact

¹⁰ Op. cit.

¹¹ Kantar Media. Measuring News Consumption and Attitudes. Annex 5 to Ofcom’s advice to the Secretary of State for Culture, Olympics, Media and Sport By Kantar Media. 29 June 2012

statements contained in the Kantar Media work, ensuring that as far as possible these proxies do not simply replicate other aspects of the measurement framework, particularly consumption.

29. Kantar Media's work for Ofcom in 2012 demonstrated that an association with characteristics such as trust and accuracy are closely linked with consumption and impact (or its proxy of 'personal importance'). For example, "there is a high level of correlation between importance and accuracy and reliability" and "there is a high level of statistical correlation between trustworthiness and importance."¹² It would be instructive, therefore, for Ofcom in its forthcoming proposals to clarify how it would plan to include an examination of these lines of causality within the measurement framework in order to ensure that consumption and impact metrics are not interpreted in isolation from their wider context. The important point is that impact, as measured by proxy statements like 'personal importance', may simply indicate that people use different providers for different purposes, and that a particular purpose such as finding an impartial take on the news may be particularly personally important – a conclusion which does not necessarily indicate a problem for plurality. Indeed, it could indicate the opposite.

Contextual factors

- *Are the contextual factors identified in 2012 sufficient to informing future plurality assessments when used alongside other measures of availability, consumption and impact? Should additional contextual factors be considered?*
30. The BBC's view is that the range of contextual factors identified in 2012 is broadly sufficient to informing future plurality assessments when used alongside other measures of availability, consumption and impact. However, as noted earlier in this response, the BBC recommends that Ofcom ensures its measurement framework also allows it to look at the causality and drivers of consumption and impact.
31. In particular, the BBC has highlighted a number of risks and imperfections with the range of plurality metrics which Ofcom put forward in its 2012 advice. As part of the next phase of its work, Ofcom should therefore consider further targeted exploratory research into the development of metrics capable of answering these concerns and opportunities for improvement. However, if Ofcom considers that the search for an (objectively) perfect mix of indicators for measuring plurality in news and current affairs is in vain, this only underlines another important area for development. As stated earlier, an important task for Ofcom in coming forward with its proposals at the next stage of this process will be to clarify not just which metrics are 'in' on a sensible basis, but how the indicators and metrics should interact to inform an overall assessment. A crucial part of this includes how the quantitative metrics should be set in and reconciled with the wider context – how will 'contextual factors'

¹² Op. cit.

be weighted appropriately in the analysis – and allow for a properly informed judgement about any threats to plurality as a result.

Measuring media ownership and influence across the news value chain

- *How should the plurality measurement framework consider media ownership? Do the retail and wholesale measurements we used in our previous work remain relevant to this? What other approaches could be used to complement these?*
- *Should the measurement framework seek to capture the influence of news and current affairs organisations operating in parts of the value chain other than the retail and wholesale levels we examined in our previous work? If so, how?*

32. On the value chain, the BBC's view is in line with the Government's conclusion that "all parts of the news value chain, from collection to dissemination and aggregation should be included in our assessment."¹³ Accordingly, Ofcom's proposals for a framework for measuring media plurality would need to capture these areas of impact and monitor the evolution of digital intermediaries.

33. In its Call for Inputs, Ofcom note that it will be important for a framework for measuring media plurality to be capable of monitoring "news organisations' differing governance models" and the impact that this has on plurality. The BBC agrees with this view and encourages Ofcom to ensure that the measurement framework is able to capture the role that different ownership and governance models play – as noted earlier in this response – on the chain of causality which drives share of consumption and to ensure that the significance of these factors to plurality can be appropriately taken into account in a future assessment.

Considering the relative importance of different metrics

- *Are there other relevant considerations on the relative importance of different metrics that the framework should reflect?*

34. The starting point for any plurality assessment, we believe, must be an analysis of the number of different voices – measured across platforms - available to consumers in any market. Availability leads to choice and, regardless of actual scale of consumption, can ensure that a range of ideas are circulated and that scope exists for alternative views and perspectives to be presented. Digital media mean that stories from relatively obscure sources can quickly become common currency of debate. It is important, therefore, that availability metrics are given due weight relative to consumption and impact metrics.

¹³ Media Ownership & Plurality Consultation Report. Government response to the House of Lords Select Committee on Communications Report into Media Plurality. 6 August 2014

35. Above all, the BBC's view is that Ofcom's proposals should clarify how it intends to ensure appropriate importance is given to the aspects of judgement inherent to evaluating consumption and to reconciling the quantitative measures with the a wider set of critical 'contextual factors'. As stated earlier in this response, the risk of establishing these considerations as merely contextual to the core measurement framework is that they appear marginal to the purpose for which the measurement framework is being developed. The BBC's view is that these aspects of the plurality measurement framework are fundamental.

Final question

- Do you have any other comment of relevance to the Secretary of State's request for a media plurality measurement framework?

36. None.