

Response to Ofcom Media plurality measurement framework – call for inputs (2015).

Question : *Do you agree with our approach to measuring impact? If not, how could impact be better captured?*

Summary of main points

- Measuring media plurality through a direct quantitative method is not possible and therefore, indirect qualitative proxies are used.
- Ofcom through its commissioned studies has demonstrated that measuring impact is faced by limitations like methodologies difficulties, non-availability of experts, media convergence and validity of results.
- For the purpose of measuring impact more accurately, it is proposed that consumers be categorized into classes like decision makers, policy formulators, media workers themselves, academia, diplomats and businessmen.
- Proposal for using Social Impact Assessment (SIA) as a tool for measuring media impact upon consumers has been forwarded in this response.
- Advantages of SIA include; relevance to policy intervention of measuring media plurality, significance as social process and low financial costs.
- Application of SIA might be limited by availability of experts. It is proposed that a pilot study may be undertaken involving SIA practitioners, media consultants and academia.

RESPONSE

Ofcom has proposed to measure Impact of media upon consumers both at the platform and provider levels through consumer research and using proxy of “personal importance”. Furthermore, Ofcom proposes to measure perceived impartiality, reliability and quality as impact factors.

The basic premise of this response is that any impact is measured for a reason. The most important being the “changed mind-set” that would emanate from exposure to media. An impact would trigger a behavioural shift by the consumer / viewer / reader. I agree with Ofcom’s approach to using proxies for measuring impact.

However, in this response, I would provide an overview of the methodological difficulties in measuring impact as identified by Ofcom itself, argue that consumers should be categorized

for measuring impact. Prof. Steven Barnett in his response to Ofcom has emphasized to categorize decision makers and policy formulators. I would propose further categorization into the media workers themselves, academia, diplomats and businessmen. Moreover, I would propose using Social Impact Assessment (SIA) for measuring impact.

Limitations of current methods used

It has been demonstrated through responses and studies undertaken by consultants for Ofcom, that accurate measurement of Impact is not possible. Limitations identified in measuring impact are overwhelming. Moreover, issues like convergence and the use of online media has made measuring plurality more difficult.

Kantar Media, which undertook a consumer research for Ofcom in 2012, concluded that personal importance has limitations as “.....it is an overt, conscious measure and as such provides only part of the picture”. BBC in its 2012 response argued that measuring impact might not add significantly to measuring media plurality as impact is correlated to consumption and that more research is required. Oliver & Ohlbaum Ltd. while researching for Ofcom stated that quantification methods for measuring impact of online sources are limited by availability of experts who are well versed in both information / computer sciences and as well as social sciences.

Studies¹ commissioned by Ofcom have clearly stated that there is no direct method to measure impact. Academic research which examines the effects of the media upon public opinion (covering a range of disciplines including economics, political science, sociology, psychology and communication studies) is also not conclusive in this area (Kantar Media, 2012). More of a qualitative science, nevertheless statistical techniques like Mapping, Bubble Charts and Key Driver Analysis have been used to measure influence. Yet these methods have shown that impact of news sources vary among consumers.

“The Sun newspaper has the highest reach of all the titles. However the Guardian/Observer newspapers have much higher claimed personal importance among their readers (8.0 v 6.5). This indicates that personal importance is not directly correlated to size/reach. These findings

¹ For the purpose of this response on measuring impact, studies referred to are “Measuring Online News Consumption and supply” by Oliver & Ohlbaum Ltd (2014) and “Measuring News Consumption and Attitudes” by Kantar Media (2012).

suggest personal importance adds another dimension to the understanding of people's relationships with news sources" (Kantar Media, 2012 pp. 64). Such illustrations depict the subjectivity of measuring impact upon consumers and shows that different consumers respond differently to various sources of news.

The method of Sentiment Analysis (also called Opinion Mining) has been used to assess impact for online media. "The general advantage of the approach is the ability to conduct content-analysis on a far larger scale than what can be done with human coders. The general disadvantage is that sentiment analysis at least so far continues to operate at a fairly superficial level in terms of the meaning of the material analyzed because of the difficulties of automating more sophisticated interpretive work. In addition, different methodological approaches to sentiment analysis tend to lead to substantially different findings, raising questions over which methods are most valid and reliable" Oliver & Ohlbaum Ltd, 2014 pp. 44).

The above illustrations show the difficulty of measuring impact directly and accurately.

Recommendations

Categorizing Consumers

In order to refine the understanding of impact on consumers, it is recommended that consumers be categorized in terms of their influence on democratic process. As illustrated above, impact cannot be quantified accurately if the entire sample of consumers is treated as one and the same. Subjectivity of impact demands that consumers be identified and categorized into different classes². These categories could include opinion leaders and policy makers (Steven Barnett, 2013), media workers³ & journalists, academia including teaching faculty and students⁴, businessmen and diplomats who are also following British media and have influence on market economics and governance. It is not to diminish the value of common consumer, which remains to be the most important segment of society and pivotal player in democratic system.

² Classes are not referred to as gender, age, financial status or demographic distribution in this response.

³ Editors, producers, researchers within media organizations and employees in capacity of having influence within the media organizations.

⁴ Excluding students below the age of adult franchise / common suffrage

The role of opinion leaders and policy makers in ensuring media diversity / plurality need not be elaborated in detail as it has been accepted by Ofcom in its previous call for responses.

Media workers themselves and journalists also acquire information from existing news sources. Although that primary source of information for journalists still remain face-to-face interaction and documents, yet the case for including them in assessing impact is justified by the practice that electronic (broadcast) media mostly relies on newspaper stories.

Here I would like to emphasize that the collaboration between journalists and government decision makers is of prime importance in terms of moulding opinion making and policy formulation. As demonstrated in a study, policy change resulted from collaboration between journalists and government staff members (Cook et al., 1983).

Measuring impact on academia and students is recommended primarily for the reason that they are involved in objective and unbiased analysis of information. As other people, academia also follows media to keep abreast with current affairs. However, keeping in view their specific interests and enhanced knowledge about specific topics, the impact of news is different and much deeper.

In today's open market economy and the global scale of trade, businessmen rely on news media to obtain information about markets. Studying impact on businessmen, as a separate category of consumers, could provide useful insight on how local economy is affected by international / national business. This impact assessment could also prove significant particularly where the business itself is media i.e. mergers and acquisitions of media organizations.

The diplomatic circles within UK follow news for different reasons. One of the role of national media is also to project the image of a country abroad. The emerging field of public diplomacy heavily relies on how to use media for fostering relations among different states. Assessing media impacts would indirectly serve the purpose of knowing image of UK abroad.

The purpose of categorizing consumers into above mentioned classes should not be seen as making the impact assessment process more complex. Since all the information collected would be through surveys, as is done by Ofcom for all their market studies, therefore,

categorization of consumers would not carry any extra expenditures at the collection stage. However, at the data analysis stage monetary expenditure is expected in terms of payment to consultants, but not very significant amounts. Major portion of expenditure would still be apportioned for data collection.

Using Social Impact Assessment for measuring media impact

As stated in the start of this response, the need for assessing impact is to gauge the extent of change. In my opinion there is always a social, economic and political aspect of any media impact and all three aspects are relevant to the debate of media plurality.

Social Impact Assessment (SIA) was initially applied to development projects⁵ and now it has grown into a type of policy oriented social research that is applied in all sectors of society. It is defined as “the process of identifying the future consequences of a current or proposed actions, which are related to individuals, organizations and social macro-systems (Becker, 2001). Application of SIA for conflict management with special emphasis on the role of media has already been proposed by academia. It has been considered because media represent a source of information and provide a venue for the expression of public opinion and are hence useful in the application of SIA (Prenzel & Vanclay, 2014).

Since formulation of a media plurality framework is a policy decision with significant social involvement, therefore, I propose using SIA for measuring the impact component of media plurality. It would involve assessing a baseline situation for current levels of media impact and then comparing it with assessment after an intervention. Intervention here would refer to a significant activity like election, major policy shift by the government, crisis or emergency, or any other issue that has a large bearing on the media consumers.

The methodology proposed for applying SIA to measuring media impact would involve generation of strategic scenarios where through field surveys, consumers may be asked to provide their opinion for every scenario. For example to know the level of political awareness among voters after watching / reading / listening to different political campaigns on TV /

⁵ Development projects refer to physical infrastructure projects like roads, housing, power, environmental projects, technology innovations etc.

Newspapers / Radio and/or internet, media consumers can be asked questions about the level of change or inclination to a specific issue facilitated by a news media. Here the strategic scenarios could be specific issues like opinion about health, education, immigration or any other policies that a political party propagates. The consumer survey carried out for measuring impact would aim at pinpointing the change in opinion of a consumer before s/he knowing about the policy and then comparing it with the situation after exposure through the media.

Advantage of using SIA is that it can be applied to assessing local, national and regional media plurality impacts. Moreover, it would only require addition of topics and questions in the existing surveys that Ofcom has already commissioned. Hence, financial expenditure is not significant. However, the availability of experts might pose a problem. It is recommended that Ofcom may undertake a small pilot study involving development practitioners well versed with the process of SIA, existing experts from the media consultants and academia. Lastly, SIA could also prove to be a baseline assessment as there has been no request for baseline assessment so far (Ofcom, 2015).

Critical Reflection on Policy Consultation

The application of “public interest test” towards measuring media plurality poses complexity to the issue keeping in view the vast definition of public interest. At times the tension between private interest and public interest becomes severe. *“The degree and methods of intrusion into an individual’s privacy are held as being dependent upon the degree of public interest. The higher the degree of public interest, the greater the degree of intrusion permitted”* (Morrison, D and Svennevig, M. 2002). Therefore, it has to be kept in mind that there would be future legal consequences when Media Plurality laws are in place and commercial media organizations try to prove their point for increasing media diversity vis-a-vis cross-media ownership and increasing their reach to consumers through various platforms.

Decision making powers with regards to this consultation, as per Enterprise Act 2002, are concentrated in the Office of the Secretary of State and Ofcom’s role is that of an “expert advisor” and “reporter”. Such concentration of power in one institution / office undermines the principle of good governance and relegates the regulator’s authority. Delegating and

distributing the decision making powers would not only shorten the amount of time being served on disposing individual cases, but at the same time reduce burden on the office of the Secretary of State. Only in cases where a reference is to be required to other offices, for example reference to Competition Commission in mergers, the Office of Secretary of State can be approached.

The role of contextual factors towards measuring media plurality is very important due to the subjectivity of consumers. A piece of information, irrespective of the platform and/or provider, tends to have different impact on the opinion formation ability of a consumer. Inclusion of contextual factors in aid of quantitative matrices will most certainly add to the understanding of the other categories of availability, consumption and impact.

Overall, in my opinion arriving at a consensus on media plurality measurement framework is very much achievable through stakeholder's consultation. However, I feel that the call for responses has not been widely circulated among stakeholders. Written responses would prove to be helpful for Ofcom but a formal gathering like a focus group or a public hearing would help Ofcom in gauging public opinion in a more direct manner thereby increasing public confidence and validity of this consultation.

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