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Dear Sir/Madam

Measurement Framework for Media Plurality

The Carnegie UK Trust welcomes the opportunity to respond to Ofcom's consultation on a measurement framework for media plurality. The Trust works to improve the wellbeing of people throughout the UK and Ireland. Since 2011 we have run a 'News, Media and Society' programme which has examined a variety of issues relating to media regulation and plurality with a particular focus on local news.

Our comments in response to the consultation focus on how the new measurement framework for media plurality can better recognise and support the UK's hugely successful hyperlocal news sector, building on the excellent work Ofcom undertook on this issue in the 2012 Communications Market Review. Our points are wide-ranging but apply primarily to the following consultation questions:

- *Do you agree with our proposed measurement framework for media plurality? What, if anything, should be added to the measurement framework?*
- *Do you agree with our approach to online content? If not, how could it be improved?*

The growing importance of hyperlocal media

Grassroots, digital-first hyperlocal news, relating to a town, village or postcode, is an increasingly critical part of the UK's local media landscape. Ofcom's 2012 Communications Market Report identified over 400 hyperlocal websites in the UK, producing thousands of news stories each week. The CMR highlighted that an increasing number of people were accessing these services each year, with one in seven accessing this content monthly. All of these numbers will have significantly increased over the past three years.

Subsequent research by organisations such as Cardiff and Birmingham Universities, NESTA and the Carnegie UK Trust has demonstrated that hyperlocal news sites in the UK are producing a wide range of original, independent content, creating the same civic, cultural and community benefits that traditional media has been delivering for decades.

These small, nimble, mainly digital organisations are finding innovative and creative ways of increasing local media plurality – adding significantly to the diversity of viewpoints available to consumers in many communities. Many sites are citizen-led volunteer operations, while some are produced by a new generation of local news entrepreneurs experimenting with new business models. Their range of work includes: using open data to act as 'armchair auditors' of local public bodies; election coverage; initiating and publicising local campaigns; providing a platform for civic engagement; providing local investigative news; establishing online discussion forums to give communities a voice; storytelling; offering a valuable platform for local businesses to connect with customers; insights into local cultural identity; supplying information on local culture, arts, music, sport and events; boosting civic pride; spreading skills and digital literacy by working with community contributors to produce news changing perceptions of the neighbourhoods they cover; and collaborating with local business, including technology start-ups, to innovate online services. Through this, the hyperlocal sector contributes significant social and economic value across the UK.

There is a growing sense of purpose around the hyperlocal sector with increased engagement from funders, the academic community and other local news

providers, including the BBC. The potential continued growth of hyperlocal media offers great benefits to local media plurality, increasing diversity and helping to inform citizens.

Why the plurality measurement framework needs to include hyperlocal media

Despite the great success of hyperlocal media in recent years the sector faces a number of challenges if its considerable potential in boosting plurality is to be achieved.

As the consultation document sets out, Ofcom's approach includes both action to prevent the reduction of plurality; and action to promote increased plurality. We believe that, for understandable reasons related to the significant decline of the local newspaper industry, too much of the local media plurality debate in recent years has focused on managing market exit. However, there are a number of barriers to market entry where action is also required. For example, hyperlocal media are currently unable to access any of the £250 million public funding and support provided to local media each year in the form of money for BBC local radio; statutory fees paid by local authorities and other public bodies to display public notices; zero-rating on VAT for local newspapers; the community radio fund; and the local TV subsidy. This lack of a level playing field between incumbents and new entrants, such as hyperlocals acts as a significant barrier to increasing media plurality.

While we appreciate that many of these issues are policy questions for government rather than Ofcom, they set an important context for the consultation.

In this regard, the new measurement framework provides an ideal opportunity to repurpose the media plurality debate, with an increased focus on how policy and regulation can better encourage market entry into local media, making it easier for new voices to contribute to the local news landscape and deliver the wide array of valuable civic content described above.

Recommendations

We suggest that the critical first step in this process is for Ofcom to build on its work from 2012 and comprehensively measure the UK' s hyperlocal news sector as part of its wider media plurality assessment. The proposed headings in the measurement framework – availability, consumption, impact – appear to us to be correct and it is essential that the hyperlocal sector is included in Ofcom' s assessment of the media market against these headings. For example, it is critical that Ofcom' s consumer surveys which research how people access local news include a specific prompt about whether people receive local news from local websites, Twitter feeds or Facebook pages about the place where they live.

There are a number of academics and practitioners who could support this work and we suggest that Ofcom works with these groups to undertake a quantitative and qualitative review of hyperlocal, grassroots media. The scale, scope, strengths and weaknesses of hyperlocal media should be key parts of this important assessment.

For our own part, we are currently working with Talk About Local to update, rename and revamp the previous hyperlocal database, Openly Local. This work will be completed by autumn 2015 and we would offer it as a contribution to the wider assessment described above.

We hope that you find these comments helpful. If you would like to discuss our response please contact me at douglas@carnegieuk.org or on 01383 721 445.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Douglas White', with a stylized flourish at the end.

Douglas White
Head of Advocacy