Measurement framework for media plurality

A consultation on Ofcom's proposed advice to the Secretary of State for Culture, Media and Sport

About this document

Ofcom has been asked by the Secretary of State (Culture, Media and Sport) to develop a measurement framework for media plurality. This document sets out our proposed framework, and gives the background on how we developed it, based on work we have done in the past, and on the Secretary of State's request. With this document, we are consulting on our proposed framework. We invite the views of stakeholders on the framework and the indicators we have included.

Contents

Section 1

Executive summary

1.1 Plurality matters because it makes an important contribution to a well-functioning democratic society. We define plurality with reference to the following desired outcomes of a plural market:

- ensuring that there is a diversity of viewpoints available, and consumed, across and within media enterprises; and

- preventing any one media owner, or voice, having too much influence over public opinion and the political agenda.

1.2 Ofcom's previous work on plurality has been on the first of these (informed citizens), as this goal helps mitigate the second (influence over the political process). The first is also better aligned to our current duties to further the interests of consumers and citizens in relation to communications matters.

1.3 In September 2014 DCMS asked Ofcom to develop a suitable set of indicators to inform a measurement framework for media plurality, in consultation with industry. The scope was defined by DCMS in August 2014, and was based on the conclusions of its June 2013 consultation on the scope of a measurement framework for media plurality. Ofcom's response to this consultation was a summary of our previous advice from 2012.

1.4 In October 2014, we published a Call for Inputs, which formally began our stakeholder engagement. Our Call for Inputs proposed building on the advice we gave in 2012, which focused on three categories of quantitative metrics, measuring the availability, consumption and impact of news content, alongside the consideration of relevant contextual factors. The Call for Inputs also asked questions on a number of additional areas. We received 11 responses to this Call for Inputs.

1.5 The responses to our Call for Inputs broadly agreed with our approach to build on and improve the advice we gave in 2012. Our thinking on the proposed framework on which we are now consulting has been informed by stakeholder feedback, both from our previous work on plurality and from our most recent Call for Inputs (in October 2014).

1.6 As part of our approach to build on and improve the framework that we developed in 2012, we have focused in particular on the areas that were highlighted by DCMS in its request for this latest phase of work. Below we summarise the areas in which our thinking has developed:

Online news, including aggregators and digital intermediaries

1.7 The number of news sources available online is greater than across broadcast or print media, and these services source and disseminate news in different ways. Section 3 on market context, and the responses to our Call for Inputs, note the increasing relevance and use of online news.

1.8 In line with the scope set by DCMS, we propose that any online news source that originates content, or which has an influence over the selection of news content, should be measured by the framework. Influence may be exerted through the

curation of content, by the selection of titles or by adjusting the prominence of titles or stories. Under this approach, online news, aggregators and digital intermediaries would all be captured by the framework.

1.9   We propose that the use of these sources is quantified using survey data. While this method is imperfect, and relies on claimed use, we believe that it will best determine the full range of online news sources and their levels of use.

Cross-media and sector-specific consumption metrics

1.10   Well-established measurement systems exist for TV, newspapers and radio. However, using sector-specific measurements in a cross-platform framework poses challenges as the different methodologies are not comparable. As it is common for media companies to distribute their content across different platforms, it is important to provide an indication of reach across all these platforms.

1.11   Given the challenges of combining sector-specific measures, we believe that bespoke cross-media consumer research is the most appropriate way of measuring cross-media consumption. We continue to propose using the 'share of references' metric that we originally proposed in 2010, which we have further tested and refined since then. 'Share of references' is constructed from consumer research. Respondents are asked which sources of news they use, and how often they use each source. The total number of references is then summed, and the references to each title or provider can be aggregated and expressed as a share of the total.

1.12   We are aware that, as with any consumer research, share of references has its limitations. We consider, however, that it is important to be able to understand cross-media reach. As such, we remain of the view that a cross-media metric such as share of references, which uses a consistent methodology across platforms, should be part of the measurement framework. We also consider that sector-specific measures, including industry measurement systems such as BARB and RAJAR, have value in being considered alongside cross-media metrics.

Measuring impact

1.13   Measuring media impact is a complex issue. One of the key challenges in measurement is that people are unlikely to be fully aware of the impact the media might have on them. In 2012, we carried out in-depth, qualitative research and an academic literature review to aid our thinking on this issue. Since then, we have undertaken further work to understand media influence and its measurement.

1.14   In our advice in 2012, we said that impact could be measured by using a proxy, given the challenges of asking about it directly. We said that the stated importance of a news source was the most useful proxy, and that further context could be provided by measures of perceived impartiality, reliability and quality. We noted that there was no single proxy that fully constitutes impact, and that it is therefore important to assess a range of elements in the round.

1.15   We continue to believe that the stated importance of a news source is the most useful proxy for impact. We propose that this metric can be refined to focus on the importance of a news source in helping people make up their minds/form their own views, and we also propose that this measure is examined alongside measures of perceived impartiality, reliability and quality, to provide context.

The role and relevance of contextual factors

1.16   We maintain that quantitative metrics are an important part of assessing the level of media plurality, but that these metrics alone are insufficient for a full assessment of plurality. We continue to propose that any measurement framework should capture and consider contextual factors alongside quantitative metrics.

1.17   In Section 4 below we provide examples of how the operating environment may vary between media organisations, and therefore affect the contextual factors that may be used in a plurality assessment. These examples include, but are not limited to, governance models, applicable regulation and market trends. We consider that it is not possible to predict all the contextual factors that may be relevant to any given assessment.

1.18   We note that there are ongoing developments in technology, consumption, distribution mechanisms and research methodologies. We propose that developments such as these are noted in narrative on contextual factors as and when they become relevant.

Measuring plurality in the UK nations

1.19   Our previous work on media plurality has identified different levels of plurality across the UK. It is therefore important that the measurement framework is able to capture these differences to ensure that policymakers are enabled to have an informed debate on media plurality within the UK and each of the nations.

1.20   We believe our broad proposed approach to measuring media plurality remains relevant to each of the nations and can provide the flexibility to capture the use of UK-wide and international news within the nations. We propose that, in order to fully identify differences within and across the UK nations we will add to our availability and consumption metrics.

1.21   We propose adding to our availability and consumption metrics by carrying out additional consumer research that asks consumers whether they follow news relating to their nation, and if so, which news sources they use for this purpose. We consider that asking these questions would provide the most objective view of what is used for news about each nation by citizens in that nation, including local, national or UK-wide media. We would also consider qualitative information relating to each nation as part of our narrative on contextual factors.

Measuring media ownership

1.22   DCMS has requested that at least one measure of the framework should be closely focused on media ownership. Although our advice in 2012 did not include a specific metric relating to media ownership, we addressed the issue by proposing that the metrics of the framework should have the flexibility to be considered at both the retail and the wholesale level. We continue to propose this approach, which allows for key quantitative metrics (including the cross-media share of references measure) to be aggregated by the ultimate owner of the news sources concerned.

1.23   We define the retail function as relating to the individual title, or brand, of each news source that is providing content to the consumer. The wholesale function refers to the supply and production of the news for a retail news source. In producing our metrics for the news consumption reports, we aggregate news sources with common

ownership at both the retail and wholesale levels. In doing this, we are able to assess the consolidated reach and impact of a given media owner.

1.24   Partially-controlled news sources (i.e., those over which a given media owner does not have full control but may have a degree of influence; for example, over its operation and policies), would not be included in the aggregation of fully-controlled entities. We do, however, consider that such relationships may be important, and propose that they should be noted in a qualitative narrative as part of the contextual factors in our framework.

Section 2

Introduction

The goals and meaning of plurality

2.1 Plurality matters because it makes an important contribution to a well-functioning democratic society. Media plurality is not a goal in itself but a means to an end. Plurality in media contributes to a well-functioning democratic society through the means of:

- **informed citizens** who are able to access and consume a wide range of viewpoints across a variety of platforms and media owners; and

- **preventing too much influence over the political process** being exercised by any one media owner.

2.2 The focus of our work in this area to date has been on the first of these (informed citizens), as this goal helps mitigate the second (influence over the political process), and is also more aligned to our current duties – to further the interests of consumers and citizens in relation to communications matters.

2.3 We define plurality with reference to the following desired outcomes of a plural market:

- Ensuring that there is diversity of viewpoints available and consumed, across and within media enterprises. There should be a diverse range of independent news media voices across all platforms and a high overall consumption across demographics and consumers, actively using a range of different news sources.

- Preventing any one media owner, or voice, having too much influence over public opinion and the political agenda, with no organisation or news source having a share of consumption that is so high that there is a risk that consumers are exposed only to a narrow set of viewpoints.

The statutory framework

2.4 Two pieces of legislation define Ofcom's role with regard to media plurality: the Communications Act 2003 and the Enterprise Act 2002. Under each, Ofcom has a fairly wide discretion as to what matters.

2.5 Under the Communications Act, Ofcom's principal duty is to further the interests of citizens in relation to communications matters and to further the interests of consumers in relevant markets, where appropriate by promoting competition[1]. Ofcom is required, in carrying out this duty, to secure various ends, including the maintenance of a sufficient plurality of providers of TV and radio services.

2.6 There are essentially two approaches to achieving this duty: defensive measures which prevent actions taking place that would reduce media plurality, which include the existing regulatory framework governing media mergers; and mechanisms to

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[1] Section 3 Communications Act 2003

promote media plurality, such as the PSB obligations which are secured in return for implicit subsidies.[2]

2.7   Parliament has also put in place media ownership rules for TV, radio and newspapers. Section 391 of the Communications Act 2003 sets out that Ofcom must carry out regular reviews (at least every three years) of these rules.

2.8   Under the Enterprise Act, Ofcom has a formal statutory role in relation to certain media mergers. This role is triggered by an intervention notice issued by the Secretary of State, which specifies a 'media public interest consideration'. If the Secretary of State issues an intervention notice in this manner, Ofcom is required to report whether it is, or may be, the case that the merger may be expected to operate against the public interest. It is then for the Secretary of State to decide whether there is a plurality concern requiring further investigation by the CMA (formerly the Competition Commission), and ultimately to determine any remedies.

2.9   Ultimately, media plurality policy and the question of what constitutes 'sufficient' media plurality are for Government and Parliament. Ofcom's role within this context is as an expert advisor and reporter to the Secretary of State.

Developing a suitable set of indicators to inform the measurement framework for media plurality

2.10   In June 2013, DCMS consulted on the scope of a measurement framework for media plurality. Ofcom's response to this consultation was a summary of our previous advice.

2.11   In August 2014, DCMS set out its conclusions on the scope and objectives of a measurement framework. These are, in summary:

- online content should be included within the scope of any new measurement framework;

- the type of content which is most relevant to media plurality is news and current affairs;

- the scope should include all organisations which impact the news and current affairs that UK consumers access;

- the BBC's impact on plurality should be in scope;

- the framework must deliver indicators capable of illustrating the situation at UK-level and in each of the nations; and

- at least one of the measures should focus closely on media ownership.

2.12   DCMS asked Ofcom to develop a suitable set of indicators to inform the measurement framework for media plurality in September 2014. DCMS specified that the framework should be developed in consultation with industry.

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[2] The PSB framework acts to ensure certain levels of content provision, including news, in return for specific benefits, including EPG prominence and access to spectrum to make services available on the digital terrestrial platform.

2.13   The Government has committed to commissioning a measurement framework for media plurality, which would allow the first ever baseline assessment of media plurality in the UK. There has been no request to carry out the baseline assessment.

The Call for Inputs

2.14   We published a Call for Inputs on 30 October 2014, which formally began our stakeholder engagement on developing a measurement framework for media plurality. We received 11 responses, mainly from parties that had previously engaged with plurality issues. Industry stakeholders included: BBC, Sky, News UK, 21c Fox, Channel 4, News Media Association. Other respondents were the Voice of the Viewer and Listener, Steven Barnett from the University of Westminster and Sharif Labo (who acknowledged Damian Tambini) from LSE. There were two further confidential responses.

2.15   The responses focused on the complexities and challenges of measuring media plurality, but the views expressed on how to deal with these varied significantly. For example, when expressing views on whether our 2012 work was still relevant, some respondents (e.g. Sky) said that it went too far in attempting to measure unquantifiable aspects, and encouraged us to go back to a simpler approach, focused solely on 'availability' aspects (i.e., counting the number and qualitatively assessing the range of voices available to relevant audiences). Others (e.g. Steven Barnett) took the opposite view; that our 2012 approach did not go far enough in capturing the power of news providers to influence opinions of audiences and elite decision-makers, and, through those, the UK democratic debate.

2.16   We have considered and taken all viewpoints into account while formulating this consultation and have published the responses to the Call for Inputs on the Ofcom website.[3]

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[3] http://stakeholders.ofcom.org.uk/consultations/plurality-cfi/?showResponses=true

Market context - news consumption in the UK

Introduction

3.1   This section of our document provides context on the current market for news, by highlighting some of the recent findings of our *News Consumption in the UK Research Report[4],* published in July 2014. This report indicates that although the use of online sources of news has grown significantly, TV is still the platform used by most UK adults for news. Although use of the internet to access news continues to grow, the sources that most people are using online are the websites and apps of broadcasters and newspaper publishers.

TV is the most-used platform for news, but the use of online sources is growing

3.2   Our research found that TV is still the most-used platform for news, with 75% of adults using it for this purpose, representing a slight decrease (3 percentage points) since 2013. The proportion of adults saying that they use online sources for news has grown; from 32% in 2013 to 41% in 2014.
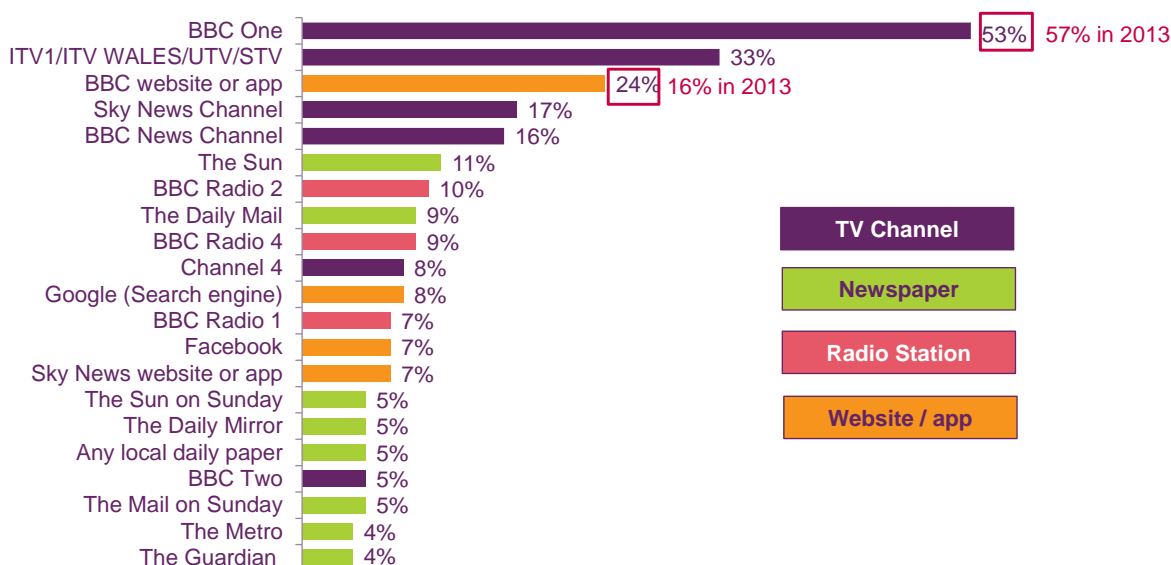
3.3   These changes are driven by the younger demographics. Although three-quarters of UK adults use TV for news, this is significantly lower among 16-24s (56%) and significantly higher among over-55s (90%). Those aged 16-24 are more likely to use online content; 60% of this age group use online sources for news. Among 16-34s, use of online sources for news has increased from 44% in 2013 to 60% in 2014.

The top two news sources, in terms of reach, are both TV channels

3.4   The top two news sources across all media, in terms of reach, are TV channels; BBC One and ITV (or its national equivalent[5]) are cited as sources of news used 'nowadays' by 53% and 33% of UK adults respectively. In 2013 the top three news sources were all TV channels, but in 2014 the BBC website/app saw an increase in use (24% in 2014 vs. 16% in 2013) making it the third most-used news source. Sky News Channel was the fourth most-used source in 2014 (17%) followed by the BBC news channel (16%).

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[4] http://stakeholders.ofcom.org.uk/market-data-research/other/tv-research/news-2014/
[5] Such as STV, UTV, ITV Wales

Figure 1: Top 20 news sources, reach among all adults: 2014

BBC One	53% 57% in 2013
ITV1/ITV WALES/UTV/STV	33%
BBC website or app	24% 16% in 2013
Sky News Channel	17%
BBC News Channel	16%
The Sun	11%
BBC Radio 2	10%
The Daily Mail	9%
BBC Radio 4	9%
Channel 4	8%
Google (Search engine)	8%
BBC Radio 1	7%
Facebook	7%
Sky News website or app	7%
The Sun on Sunday	5%
The Daily Mirror	5%
Any local daily paper	5%
BBC Two	5%
The Mail on Sunday	5%
The Metro	4%
The Guardian	4%

TV Channel
Newspaper
Radio Station
Website / app

Source: Ofcom research, April 2014
Q5a-e) Thinking specifically about <Source> which of the following do you use for news nowadays?
Base: All adults 16+ (2731) Note: 2013 figures only shown where there are statistically significant differences between 2013 and 2014

3.5   Data from comScore[6] show that for online news, broadcasters and print publishers have the highest reach. In March 2014 the only online news sources to reach more than 20% of the online audience were the online arms of more traditional media organisations. The BBC news site had the highest reach, followed closely by the *Daily Mail*, then the *Guardian* and the *Daily Telegraph*. Half of the top ten most visited online news sources were the websites of national newspapers.

3.6   In addition to Ofcom's research, the *Reuters Institute Digital News Report 2014* presents the findings of online research conducted among online news users, which gives a perspective on how consumers access news online. This research found that online news users in the UK are more likely to come across news directly through a brand (45%) than through a search engine (29%), social media (17%) or aggregator (4%).[7] This suggests that a large proportion of online news users go directly to websites or apps that they know in order to access news content.

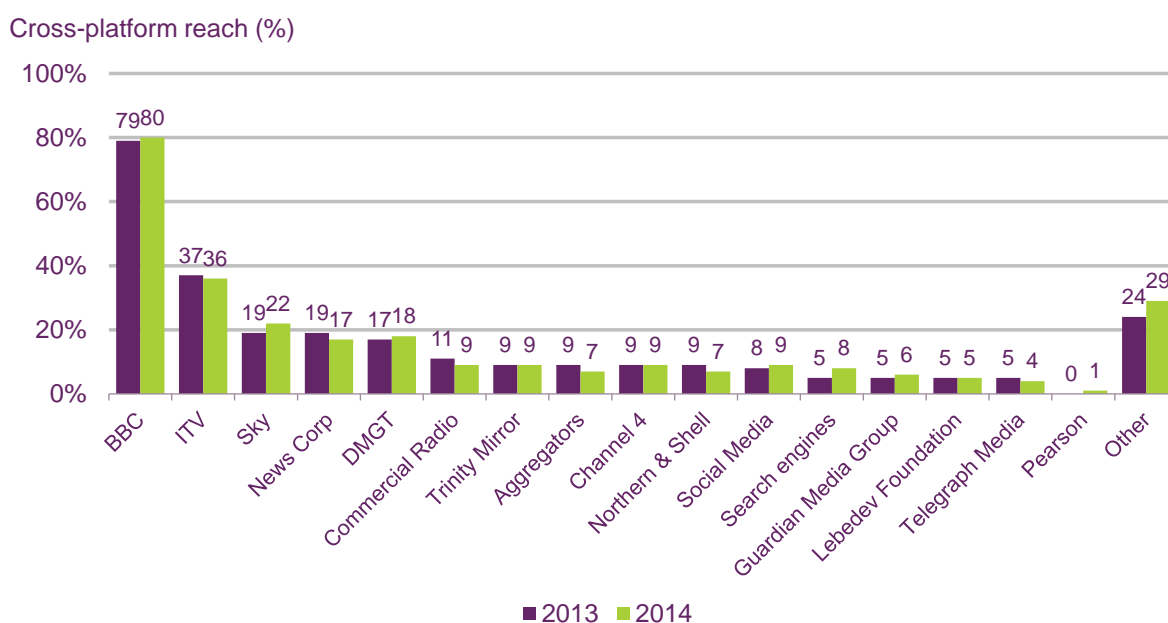**Broadcasters and print publishers have the highest cross-platform reach**

3.7   The three providers with the largest reach across TV, print, radio and online combined are broadcasters, according to our 2014 research. The BBC has the largest reach, and is used by eight in ten UK adults across TV, radio and online. ITV is used by over one-third (36%) and Sky by one fifth (20%) of adults. Publishers, News Corp and DMGT reach just under a fifth of UK adults across platforms.

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[6] For desktop/laptop use
[7] Reuters Institute Digital News Report 2014,
http://reutersinstitute.politics.ox.ac.uk/sites/default/files/Reuters%20Institute%20Digital%20News%20Report%202014.pdf, p.68

Figure 2: Cross-platform reach, by provider: 2013 to 2014 (retail level)

Cross-platform reach (%)

2013 2014

Source: Ofcom research, April 2014
Base: Q5a to Q5. All who use any platform for news 'nowadays' (2580)

3.8   The research shows that the platforms that people use to access news are changing, as are the routes which they follow to get to news content, particularly among younger people. But traditional broadcast and print news providers are still the providers used by most people, both online and offline.

3.9   In recent years there have been no significant shifts in the overall pattern of news consumption. However, growth in the use of online news, the emergence of new digital players and the increasing ubiquity of internet-connected devices may lead to evolution in the way that news is consumed in the UK.

Section 4

Proposed media plurality measurement framework

4.1   Our proposed media plurality measurement framework is based on the advice we provided to the Secretary of State in June 2012, as we consider this advice is still relevant.

Building on the 2012 framework

4.2   The measurement framework we set out in our 2012 advice[8] focused on three categories of quantitative metrics: measuring the availability, consumption and impact of news content, alongside the consideration of relevant contextual factors.

Availability

4.3   Availability metrics measure the number of providers available at the point of consumption. As per our advice in 2012, we propose that availability metrics are relevant to any assessment of media plurality, but on their own they are not sufficient for a full assessment.

Consumption

4.4   Consumption metrics measure the number of people using news media and the frequency and/or time that they spend consuming it.

4.5   As per our advice in 2012, we propose that consumption metrics (particularly share, reach and multi-sourcing) provide a reasonable proxy for the different elements of media plurality and should form the foundation of any plurality assessment.

Specifically:

- share of consumption is a good proxy for measuring the ability to influence in the news media market; and

- reach and multi-sourcing are good proxies for the diversity of viewpoints consumed.

4.6   In 2012 we noted that metrics capable of quantifying cross-media consumption are particularly important. As in 2012, we propose that a bespoke share of references metric, while an imperfect measure, is appropriate for measuring cross-media consumption. Our updated thinking in this area is detailed below.

4.7   Given the dynamic nature of the market, we continue to propose that the consumption metrics themselves should be reviewed as part of any media plurality review, to take account of other consumption metrics as they become relevant and available.

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[8] http://stakeholders.ofcom.org.uk/binaries/consultations/measuring-plurality/statement/statement.pdf

Impact

4.8   Impact metrics capture the influence of news content on how people's opinions are formed.

4.9   As per our advice in 2012, we continue to propose that while quantifying impact is complex, proxies of impact should play a part in the assessment of plurality.

4.10   The potential power of news sources to influence both public opinion and the political agenda is of fundamental importance to any assessment of media plurality. In 2012 we set out that "personal importance" was a key metric that could be used as a proxy. We propose that additional context can be given by considering measures relating to perceived impartiality, reliability and quality. Our updated thinking on how to approach measuring impact is detailed below.

The proposed measurement framework[9]

Category		Metrics	Description	Source	What it indicates
Availability	Availability and consumption metrics to be calculated at retail and wholesale levels to allow analysis of media ownership	Number of providers	A count of the number of entities providing news sources	Industry data	An indication of the potential for diversity of viewpoints
Consumption		Reach	By platform – TV, Radio, Newspapers, Internet By provider within platform	Industry measurement systems, consumer research	An indication of the variety of viewpoints disseminated
			Cross platform	Consumer research	As above. Cross media reach establishes the capability for each provider to reach the population regardless of platform.
		Share of consumption	By platform – TV, Radio, Newspapers, Internet By provider within platform HHI within platform	Industry measurement systems, consumer research	An indication of the potential concentration in patterns of consumption. Note: This would be calculated from time spent for each platform as measured by the industry measurement systems.
			Cross platform Cross platform by provider HHI cross platform	Consumer research	As above. Note: this can be in the form of Ofcom's bespoke share of reference metric that captures the reach and frequency of consumption,.
		Multi-sourcing	By platform and cross-platform	Consumer research	An indication of the extent to which consumers are sourcing their news from one or a range of sources
Impact	Personal importance		By platform By provider	Consumer research	Provides one proxy for measuring the potential to influence opinion
	Perceived impartiality, reliability and quality		By platform By provider	Consumer research	Provides additional context to the metric of personal importance
Contextual factors	A range to be considered depending on the situation		Qualitative factors relevant to a consideration of plurality that explain and add to the understanding of the quantitative metrics	Multiple sources. Examples of relevant factors include, but are not limited to: Internal plurality Internal governance processes Editorial policy Impartiality requirements Market trends and future market developments	Elements relevant to an understanding of plurality that are not able to be quantified by metrics.

Developing the framework since 2012

4.11 Our approach has been to improve and build on the framework that we developed in 2012, with particular focus on the areas that were highlighted by the Secretary of State in his request for this work. The areas in which our thinking has developed are as follows:

- online news and digital intermediaries;

- cross-media and sector-specific consumption metrics;

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[9] HHI refers to the Herfindahl-Hirschman index, an economic concept which indicates market concentration. The index is defined as the sum of the squares of the market shares of the 50 largest companies in a market. The index is expressed in a range from 0 to 10,000. The lower the index, the more competitive the market.

- measuring impact;

- the role and relevance of contextual factors;

- measuring media plurality in the UK nations; and

- measuring media ownership.

4.12   The first two of these areas (online news and digital intermediaries, and measuring media ownership) are not specific to any one set of metrics within the framework, but are relevant across all of the measures.

4.13   We propose that the framework itself should be reviewed as part of any assessment of media plurality. Such reviews will ensure that the framework is able to capture market changes, make use of any relevant technological or methodological developments which improve the ability to quantify cross-media consumption and plurality, and take account of any other developments which we cannot predict today.

Online news and digital intermediaries

4.14   In the paragraphs below, we set out the scope of online news included within our proposed framework, how best to measure online news across devices and sources, and our thinking on digital intermediaries.

Online news, aggregators and digital intermediaries

4.15   In our 2012 advice to the Secretary of State, we recommended that the framework should include those online entities which have material influence over the news by:

- controlling the titles that are made available to the public (i.e., they are gatekeepers);

- controlling the prominence of those titles online (e.g., because they control search engines or social network recommendations); or

- controlling the content of those titles (i.e., they have editorial control over important content).

4.16   In its *Media ownership and plurality consultation report*, DCMS concluded that online content should be in the scope of any measurement framework.

4.17   DCMS also concluded that the scope of the measurement framework should include all organisations which influence the news and current affairs that UK consumers access. This conclusion means that a wide variety of online enterprises are likely to be relevant to the consideration of plurality. This scope would include organisations which generate, gather and aggregate news, services which affect discoverability and accessibility, and services which provide professional and non-professional commentary, such as blogs and social media.

4.18   Respondents to our Call for Inputs also flagged up the increasing relevance and use of non-traditional news providers, noting the findings of Ofcom's *News consumption in the UK: research report* and the *Reuters Institute Digital News Report 2014.*

4.19   We note that there are three types of online news source:

- content originators – which produce original content;

- content aggregators – which do not produce their own original content, but present content from a variety of sources as part of a news service (e.g. Google News); and

- online intermediaries – which do not produce original content of their own, or aggregate news, but are used as an intermediary between the consumer and the news source (e.g. Facebook, Google search).

4.20 In line with the conclusions of DCMS, we propose that any online news source that originates content, or has an influence over the selection of news content displayed, should be measured by the framework. In the latter case, this influence may be through the curation of content, the selection of titles, or by adjusting the prominence of titles or stories. Therefore, our proposed scope includes online content originators, online aggregators and digital intermediaries.

How best to measure the use of online news across different online sources

4.21 As respondents to our Call for Inputs (Sharif Labo, 21st C Fox) have noted, measuring online consumption poses challenges, particularly in a multi-device world. Although web-measurement products exist which take account of respondents who use more than one device to access the same news sources, they do not give an indication of news consumption on, or via, non-news-specific sites (such as social media or search engines).

4.22 As Oliver & Ohlbaum's *Measuring Online News Consumption and Supply* report indicated,[10] there are a variety of online measurement tools, and they are used for different purposes:

- online news providers use a variety of existing metrics including reach, page views and time spent, derived from web analytics and measurement providers for varying commercial, editorial and managerial purposes;

- academics are using and developing online measurement tools such as social network analysis and network mapping, sentiment analysis, and sharing analysis, to provide greater insight into how online news is sourced and shared, and to examine the relationships between sources (we note that these tools do not explicitly indicate the level of consumption of sources);

- proprietary products such as Chartbeat and Newswhip offer analytical tools aimed at web publishers to help determine how content is being used on providers' websites, the extent to which it is shared, and its popularity on social media; and

- comScore, the web measurement provider used by UKOM, the joint industry committee (JIC) for online measurement in the UK, has also been developing its methodology and is testing a new system for mobile internet measurement which will be able to provide de-duplicated reach figures across devices.

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[10] Oliver & Ohlbaum Associates Ltd. *Measuring Online News Consumption and Supply,* July 2014 http://stakeholders.ofcom.org.uk/binaries/internet/Measuring-online-news.pdf

4.23   The above tools use a variety of methodologies to create a range of metrics. However, none provides a complete and consistent picture of online news consumption across both the full range of devices and the sources used. We consider that claimed use from survey data, considered alongside robust web measurement products, is likely to give the best available picture of the use of online sources for news, including the extent to which intermediaries such as social media and news aggregators are being used for news content.

4.24   Using claimed online use is not perfect. For example, people may not accurately recall the sources they have used, particularly if they use different sources for short periods, several times a day. However, the advantage of survey data is that it can capture consumption that happens outside traditional news providers, and we consider that the sources that are consciously recalled are likely to be those that are most important.

4.25   Although we will continue to monitor the development of online measurement techniques and tools, we believe that using survey data to calculate reach, share and multi-sourcing metrics will provide the most useful quantitative measures at present. As tools are developed that quantify online content consumption and dissemination, we consider that they should be reviewed as part of a plurality assessment.

Addressing online intermediaries

4.26   Online news sources may be visited directly (e.g., by using a bookmark, typing the URL of a particular news source into the browser search bar, or by using a specific news app), or indirectly, through use of a digital intermediary, such as a search engine or social media. While intermediaries may not be news sources themselves, they may still have the potential to influence news consumption, and should therefore be captured within the framework.

4.27   Web measurement software cannot indicate what people are using particular websites for; e.g. whether they are using a search engine for news consumption, or for a different purpose. Survey data can, however, identify the sources that people are consciously using for news, by asking about this directly. Both Ofcom's *News consumption in the UK: research report* and the *Reuters Institute Digital News Report 2014* indicate that people claim to be using social networks, search engines and news aggregators for news.[11]

4.28   The BBC, citing the Reuters Institute, noted that the use of digital intermediaries for news has a potential effect on plurality in a number of ways; controlling distribution, making editorial-like judgements, shaping future economic models and potentially influencing the political agenda. It also noted that digital intermediaries could have a positive effect, by increasing multi-sourcing and improving access to a wider range of news.

4.29   We also note that the use of digital intermediaries for the consumption of news could potentially affect behaviour. Additional analysis of Ofcom's *News consumption in the UK* survey data indicates that people who use digital intermediaries to access news content are more likely to access a greater number of news sources than those who do not. Those who use digital intermediaries use an average of 6.1 sources for news, compared with an average of 4.3 sources by those who do not use digital

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[11] Ofcom's *News consumption in the UK* research found that 20% of UK adults who use online news use social media for news, with a similar proportion (19%) using search engines for news.

intermediaries but do use other online sources for news. This may be because they are being directed to additional news sources through links provided by these online services, but it is also possible that people who are actively using news aggregation services, or are seeking out news through search engines, are more interested in news, and are therefore more likely to use multiple sources.

4.30   Online sources which originate content (e.g., online newspapers) or have an influence over the selection of news content displayed (e.g., online aggregators) should be included as news providers at the retail level[12]. If these sources also generate news content, they should also be included as wholesale news providers in the measurement framework.

4.31   In addition to the news sources themselves, we need to understand the proportion of online news accessed via intermediaries, given their potential to influence news consumption. The use of intermediaries should be captured and displayed separately in order to understand the extent to which they are used to get to online news sources. We propose using survey data to provide the best indication of how digital intermediaries are used.

Cross-media and sector-specific consumption metrics

4.32   News sources are used across a range of media and sectors. As the use of online news sources grows, it becomes even more important to understand news consumption across different platforms. We set out below why sector-specific metrics alone are insufficient, our proposed approach to cross-media measurement, and the limitations of a cross-media approach.

Sector-specific measures are evolving, but still cannot provide the whole picture

4.33   We noted in our 2012 advice that there exist well-established sector-specific measurement systems. These systems are based on credible methodologies, are produced independently and already form the basis of many business and commercial decisions[13]. While these systems do not explicitly aim to measure the consumption of news content, genre classifications (where available) can indicate the use of particular sources for news.

4.34   Since 2012, these sector-specific industry measurement systems[14] have been developing to better reflect the converging media landscape. However, as they still have a sector-specific focus, this presents a challenge to using them in a cross-platform framework.

4.35   Both the BBC and Sky noted, in their responses to our Call for Inputs, that each sector-specific system uses different methodologies and as such are not wholly comparable. The News Media Association stated that sector-specific measures could encourage "blinkered assumptions". If single-sector measures are considered in isolation, this may well be the case.

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[12] The retail and wholesale levels of analyses are set out in this document under the heading 'Measuring media ownership'.
[13] Ofcom, *Measuring media plurality: Ofcom's advice to the Secretary of State for Culture, Olympics, Media and Sport,* 19 June 2012
[14] Also known as joint industry committees (JICs)

4.36   However, as the BBC noted, these systems can be used to complement cross-platform metrics and to provide an important sense check on use within the overall framework.

4.37   In 2012 we noted that metrics capable of quantifying cross-media consumption are of particular importance. We remain of the view that a cross-media metric which uses a consistent methodology across platforms should be part of a measurement framework for media plurality.

4.38   Given the challenges of combining sector-specific measures, we believe bespoke cross-media consumer research is the most appropriate measure of cross-media consumption. We propose using a survey based approach to calculate a bespoke 'share of references' metric. Share of references is constructed from consumer research in which respondents are asked which sources of news they use, and the frequency with which they use each source. The total number of references is then summed, and the references to each title or provider are aggregated and expressed as a share of the total.

4.39   We used this metric for our *Report on public interest test on the proposed acquisition of British Sky Broadcasting Group plc by News Corporation* in December 2010. Since then we have updated and refined the metric in the light of commentary and feedback. The metric has been improved by incorporating a measure of frequency, to better quantify the extent to which individual sources are used. And we now ask open-ended questions, so that we can include any news source that is cited by respondents.

We acknowledge that there are limitations to measuring cross-media consumption

4.40   We are aware that, as with any consumer research, there are limitations. Respondents to our Call for Inputs noted that consumer research relies on claimed behaviour, and reflects remembered rather than actual consumption. Quantifying cross-media news consumption with a consistent methodology will inevitably include some element of claimed consumption; we are not aware of any methodology that can capture media consumption across all platforms, and for a large sample.

4.41   In his response to our Call for Inputs, Sharif Labo (LSE) said that share of references was a solid basis for measuring cross-media consumption. He made suggestions for amending the survey on which the metric is based. These included asking about each consumer's news use over a particular period of time, and asking about the time that consumers spent using each source. We consider that this approach may have merit in being able to provide an indication of the time spent with each source. However, this is limited by each respondent's recall and perception of the time that they have spent with a source, and may risk under- or over-estimation[15]. This risk would be greater if the consumers were asked to recall their news consumption over a longer period of time.

4.42   21st Century Fox notes that people use different media in different ways, and this is not included within the share of references metric. Steven Barnett (University of Westminster) states that by focusing on consumption, share of references

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[15] Recent work from Nielsen on TV viewing in the US found that consumers were over-stating the amount of time they had spent watching video on mobile phones by 538%.
http://www.tvb.org/4685/about_tvb/press_room/press_room_article/2014516

exaggerates the role of TV, under-estimates the role of the press and does not qualify cross-media power. He also suggests that it does not take account of the power to persuade, the opinion-forming impact of print and online media, the ability for different types of media to set the news agenda, or the power to influence Parliament and decision-makers.

We believe share of references is the most appropriate cross-media metric

4.43   We are unaware of any reliable quantitative metrics which are capable of detailing the effects of each type of media on the consumer. Furthermore, not every element necessary to an assessment of media plurality can be included within a single metric. The aim of the share of references metric is to provide an indication of cross-media news consumption from a single source of research with a consistent methodology.

4.44   We propose that share of references is used as part of a suite of metrics, alongside relevant contextual factors and the industry measurement systems, in order to give a broad view of consumption.

Measuring impact

4.45   Measuring media impact or influence is a complex issue. People can be subject to the impact of a given news source either directly or indirectly. They may explicitly consider one particular news source to be important to them, but may also be implicitly affected by other news sources. In this area, our proposals for the framework do not significantly differ from our advice in 2012, but we have taken the opportunity to review our thinking about the methodological challenges of this issue.

Measuring impact is challenging

4.46   One of the main outcomes of plurality is that it contributes to the ability of informed citizens to play a part in a well-functioning democratic society. As such we have considered impact as it relates to audiences.

4.47   Quantifying media impact or influence is challenging. People are unlikely to be fully aware of the effect of media impact. Asking people directly about the impact of news sources upon them will only reveal influences that they can consciously remember. Monitoring someone's news consumption and calibrating this against their attitudes would not capture the wealth of other experiences and inputs into the person's opinion-formation.

4.48   Academics have been examining the potential effects of the media upon news audiences for many years. There is consensus about the media's importance, but less agreement on the extent and type of media influence, or of the relative resilience of people to that influence.

4.49   A number of submissions to our Call for Inputs commented on the issue of impact. Professor Steven Barnett noted that the framework should include a way of capturing the impact of some news sources upon particular elites and decision-makers. He called for further qualitative research in order to assess how impact can be measured, particularly in relation to opinion-forming or policy-making groups, to establish their main sources of new ideas. The BBC supported qualitative judgements, given the difficulty of quantitative research. It also argued that "importance" as a measure largely correlates with consumption, and therefore that it may not add significantly to the framework. It suggested that we carry out further research to mitigate this issue.

We continue to explore the measurability of this area

4.50   In 2012 we carried out in-depth qualitative research, examining opinion formation and the perceived impact of news sources, among other topics (see Kantar, 2012[16]). Such information has helped us understand the nature of consumption and the relative position of different platforms, and different providers within these platforms. Our 2012 academic literature review included the issue of media effects, and the nature of media influence upon audiences, political understanding and policy-making.

4.51   We have since undertaken further work to understand media influence and its measurement, including commissioning Oliver & Ohlbaum to investigate developments in online news measurement[17] and engaging with academics and researchers.

4.52   In 2012 we said that there were some quantifiable proxies that could be used to measure impact, albeit imperfect ones: those of perceived importance, impartiality, reliability and quality. We noted that there was no single proxy that fully constituted impact, and therefore it was important to assess a range of sources in the round.

4.53   The increasingly informal nature of much news consumption (via social media, and via new forms of online distribution) means that impact is likely to become more difficult to measure.

4.54   We continue to propose that the stated importance of a news source is a useful proxy to better understand people's conscious awareness of the impact of a news source. This approach provides an additional dimension to consumption measures. For example, our news survey results show that some newspapers with wide circulation are allotted relatively low importance scores by their readers, and vice versa. The use of stated importance as a proxy can be supplemented by measures of perceived impartiality, reliability and quality. We also propose that the survey question relating to the stated importance of a given news source is honed to focus on its importance in helping people make up their minds or form their own views. Additional survey-based questions can be asked about the extent to which a news source is talked about, or shared, to understand more about user engagement.

4.55   Such metrics can be positioned within a wider understanding, gained from a variety of third-party research from academics and industry, of the impact of different news outlets upon users. These could include:

- analysis of the extent of online sharing of news stories via social media;

- content analysis showing the extent of original or sourced material across different outlets, to provide contextual understanding of the types of news material that are available and the extent to which some sources set the news agenda; and

- analysis of specific time periods or news events, calibrating content analysis of news output with news consumption habits and attitudes.

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[16] http://stakeholders.ofcom.org.uk/binaries/consultations/measuring-plurality/statement/Annex5.pdf
[17] http://stakeholders.ofcom.org.uk/binaries/internet/Measuring-online-news.pdf?utm_source=updates&utm_medium=email&utm_campaign=online-news

The role and relevance of contextual factors

Quantitative metrics alone are insufficient, given the complexity of news provision

4.56   Our current thinking on contextual factors remains in line with the advice we gave in 2012 on this area. In 2012, we said that quantitative metrics were an important part of assessing the level of media plurality, but these metrics alone were insufficient for a full assessment of plurality. A purely mechanistic approach to plurality fails to capture the differences between news organisations. Qualitative factors play an important role in drawing conclusions, by providing a fuller picture of plurality.

4.57   Given the importance of the role contextual factors may play in an assessment of media plurality by providing a much richer and more nuanced view of the media plurality landscape, and given the subjectivity inherent within contextual factors, we have re-visited this aspect of the framework in more detail. Our 2014 Call for Inputs on measuring media plurality asked stakeholders for their views on the contextual factors identified in our 2012 advice, and asked whether additional contextual factors should be considered.

4.58   Within the responses, there was support for contextual factors to be included within a broad framework to assess plurality. The BBC responded that "'contextual factors' are fundamental to any plurality measurement framework", and Channel 4 responded that "the contextual factors identified by Ofcom will be an essential component of any measurement framework". 21st Century Fox responded that "quantitative measures are not sufficient to assess plurality" and also commented that "the list of contextual factors to be taken into account should not be a closed list: all factors relevant to a given assessment should be taken into account". Similarly, News UK responded that "the contextual factors previously identified by Ofcom are relevant but these should not be an exhaustive list".

Contextual factors play a role alongside quantitative metrics

4.59   We propose that contextual factors be considered in the round alongside quantitative metrics. However, it is important to note that our proposed approach views contextual factors as an integral rather than a supplementary part of the measurement framework.

4.60   The assessment of contextual factors will inevitably involve a degree of subjectivity and judgement by the measuring body, and different factors will be relevant to different news sources and at different times.

4.61   The importance of including contextual factors within an assessment of media plurality arises from the fact that the operating environment can vary between organisations. Examples of how the operating environment may vary, and therefore of contextual factors that may be used in a plurality assessment, could include but should not be limited to:

- governance models – such as trusts, publicly-limited companies with shareholders, private companies, statutory corporations;

- funding models – such as advertising revenues, circulation revenues, subscription fees or public funding;

- the potential power or editorial control exercised by owners/proprietors within commercial organisations;

- internal plurality – i.e., a range of internal voices;

- market trends and future market developments;

- differences in how news is consumed – e.g., across platforms and demographics; and

- regulation and oversight (in some cases based on statutory obligations) – e.g., Ofcom's Broadcasting Code or the BBC's own editorial or regulatory processes and compliance.[18]

4.62   The contextual factors listed above give an indication of the type of factors which may be useful to consider in an assessment of plurality. However, we recognise that it is not possible to prepare in advance an exhaustive list, and our consideration of contextual factors should not be limited to the above examples. We should consider ongoing developments in technology, consumption, distribution mechanisms and research methodologies within the narrative on contextual factors as and when they become relevant to an assessment of media plurality.

4.63   When applying the measurement framework to the nations, qualitative information relating to the nature and features of each nation's market will need to be included within the assessment of contextual factors.

4.64   The tension between plurality and commercial sustainability becomes exacerbated as we look at smaller geographic units. When adapting the framework to measure media plurality within the UK nations, levels of plurality should be considered in the context of sustainability within a given nation. We will address considerations such as these within our assessment of the contextual factors for the nations.

Measuring plurality in the UK nations

Our approach to measuring plurality is relevant to each of the nations

4.65   In the Secretary of State's request, he asked that the framework deliver indicators capable of illustrating the situation at UK level and in each of the nations.

4.66   Our previous work on media plurality, including public interest tests, identified differences in the level of media plurality and sources of news across the UK and within the UK nations.

4.67   It is therefore important that the measurement framework is able to capture these differences, to ensure that policy makers are enabled to have an informed debate on media plurality within the UK and each of the nations, as appropriate.

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[18] From a regulatory perspective, broadcasters are subject to impartiality requirements, while newspapers and websites are not. Ofcom's Broadcasting Code requires that "news in whatever form, must be reported with due accuracy and presented with due impartiality." The requirement for "due impartiality" is not absolute and broadcasters have a degree of editorial discretion in the selection of the news agenda. We recognise that the impartiality rules may contribute as a safeguard against potential influence on the news agenda by media owners, but they cannot themselves necessarily ensure against it.

4.68   We believe that our broad proposed approach to measuring media plurality remains relevant to each of the nations. In order fully to identify differences within and across the nations, we propose that the availability and consumption metrics should be expanded.

Additional consumer research would be necessary in the nations

4.69   In order to establish the news sources available, and consumed, in a given nation, we propose carrying out additional consumer research. This would first ask consumers whether they follow news relating to their nation and would then ask which news sources they use for this purpose.

4.70   This approach would ensure that the full range of titles used by consumers for news about their nation would be reflected in our availability metrics. Once the news sources had been defined, it would be possible to construct nation-specific share of references metrics in order to quantify consumption of nation-specific news sources.

4.71   We consider that asking consumers within the UK nations what sources they use for news about their nation will provide the most objective view of what is used for news about each of the nations.

4.72   We considered an alternative approach: categorising news sources according to their production and/or consumption in the relevant nation. However, this approach is hindered by the subjectivity involved in taking a view on the proportion of the production, or consumption, of a news source necessary to classify it as a nation-specific news source.

4.73   In addition to quantitative measures, qualitative information, relating to the specific nature and features of each nation's market, would also be considered as part of the narrative on contextual factors. We propose this would include a consideration of the sustainability of news sources in the various markets.

4.74   The approach we have taken to adapting the media plurality measurement framework to the UK nations could, theoretically, also be used for adapting the framework to assess media plurality in smaller geographic units, such as UK regions. However, the scope set by the Secretary of State for the current measurement framework did not extend beyond the UK nations' level.

4.75   In addition, in our 2012 advice, we did not propose that any periodic review of plurality should assess regional or local media, given that the tension between media plurality and commercial sustainability is exacerbated at smaller geographic units, except insofar as they contribute to plurality at the level of either the UK or UK nations.

Measuring media ownership

4.76   In his request for our work the Secretary of State indicated that when considering the framework, we should include at least one measure that focuses closely on media ownership.

4.77   The ownership of news sources is an important factor when considering plurality. In our 2012 advice, we concluded that one of the ways in which plurality contributes to a well-functioning democratic society is by preventing any one media owner exercising too much influence over the political process.

4.78   Although we did not include a specific metric relating to ownership in our 2012 framework, we did address this issue by proposing that the framework's metrics should have the flexibility to be considered at both the retail and the wholesale level, as appropriate. We have performed such analysis when considering a number of metrics as part of our *News consumption in the UK*[19] report.

Retail and wholesale news provision

4.79   Distinguishing between the retail and wholesale functions of news provision enables us to understand any differences between the provision of news to the end user, and the production of that news.

4.80   We have defined the retail function as relating to the individual title, or brand, of each news source that provides content to the consumer. The wholesale function refers to the supply and production of the news for a retail news source.

4.81   In many cases the retail and wholesale functions behind a given news source are both directly controlled by the same entity – the same entity produces the news source, and provides it to the end user.

4.82   There are, however, several cases in which a retail provider's news source is supplied by a third-party wholesaler. Two notable examples exist in TV and radio news:

- the national news broadcasts for ITV, Channel 4 and Five are all produced by ITN, which also provides content for a number of online retail news sources; and

- Sky News Radio produces news bulletins for the majority of the UK's commercial radio stations.

4.83   In the above examples, the news source is provided in its entirety by the wholesale entity. In other cases, news providers use third-party services to supply some of the content for their services. For example, newswire services such as Associated Press and Reuters supply content to newspapers and online providers.

4.84   There are key differences between these arrangements and the wholesale relationships as we have defined them. Within wholesale relationships, the news source is provided in its entirety by the wholesaler. By contrast, when providers use a third party such as a newswire, this may be in addition to a range of other third-party sources and/or their own production of news content. As such, we do not include relationships such as these as wholesale providers.

4.85   As we note above, online intermediaries are a new type of entity which may not operate either at the retail or wholesale level. We propose that the use of such entities is captured in consumption metrics such as reach and share, in order that their potential influence can be examined alongside traditional retail and wholesale players.

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[19] http://stakeholders.ofcom.org.uk/market-data-research/other/tv-research/news-2014/

The consolidation of ownership

4.86   When calculating metrics such as reach and share of reference in our *News consumption report*[20], we aggregate news sources with common ownership at both the retail and wholesale level.

4.87   In doing this we are able to assess the consolidated reach and impact of a given media owner, either in terms of its retail news sources, or in terms of its wholesale provision of news content.

4.88   In making such assessments we would consider a relationship to represent full control in one of two scenarios:

- If it involves a holding of >50% of the voting rights in an entity which operates a news service. These rights are usually held through the ownership of shares.

- If <50% of the voting rights are held, but effective control is exercised by an alternative mechanism. Such mechanisms may include shareholders' agreements (which confer control on a particular shareholder) or joint voting patterns.

4.89   Lesser degrees of control also exist which we define as partial control. For example, a media owner may hold voting rights which do not allow full control over an entity, but do allow for a degree of influence over its operation and policies. Alternatively, influence could arise, for example, through a right to appoint one or more board members.

4.90   In situations of partial control, we would not aggregate a news source partially owned by an entity with other news sources that are wholly owned by the same entity. We do, however, acknowledge that the effect of partial control may be material and relevant to an assessment of plurality. We propose that such relationships are noted in a qualitative narrative as part of the contextual factors in our framework. We propose that as part of the framework, controlled entities should be presented in a list alongside those that are fully controlled by an ultimate owner.

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[20] http://stakeholders.ofcom.org.uk/market-data-research/other/tv-research/news-2014/

Section 6

Consultation questions

5.1 We welcome any comments that stakeholders wish to make on issues relevant to our proposed framework. In particular, we could like to gather stakeholder views on the following:

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?

Do you agree with our approach to media ownership? If not, how could media ownership be better captured?

Do you agree with our approach to measuring cross-media consumption? Are there other metrics which might better capture cross-media consumption?

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

Do you agree with the use of contextual factors as part of the framework?

Do you agree with our approach to measuring plurality in the UK nations? If not, how could plurality in the nations be better measured?

Responding to this consultation

How to respond

A1.1   Ofcom invites written views and comments on the issues raised in this document, to be made **by 5pm on 20 May 2014**.

A1.2   Ofcom strongly prefers to receive responses using the online web form at http://stakeholders.ofcom.org.uk/consultations/media-plurality-framework/howtorespond/form, as this helps us to process the responses quickly and efficiently. We would also be grateful if you could assist us by completing a response cover sheet (see Annex 3), to indicate whether or not there are confidentiality issues. This response coversheet is incorporated into the online web form questionnaire.

A1.3   For larger consultation responses - particularly those with supporting charts, tables or other data - please email mediaplurality@ofcom.org.uk attaching your response in Microsoft Word format, together with a consultation response coversheet.

A1.4   Responses may alternatively be posted to the address below, marked with the title of the consultation.

Steven Cape
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA

Note that we do not need a hard copy in addition to an electronic version. Ofcom will acknowledge receipt of responses if they are submitted using the online web form but not otherwise.

A1.5   It would be helpful if your response could include direct answers to the questions asked in this document, which are listed in Section 6. It would also help if you can explain why you hold your views and how Ofcom's proposals would impact on you.

Confidentiality

A1.6   We believe it is important for everyone interested in an issue to see the views expressed by consultation respondents. We will therefore usually publish all responses on our website, www.ofcom.org.uk, ideally on receipt. If you think your response should be kept confidential, can you please specify what part or whether all of your response should be kept confidential, and specify why. Please also place such parts in a separate annex.

A1.7   If someone asks us to keep part or all of a response confidential, we will treat this request seriously and will try to respect this. But sometimes we will need to publish all responses, including those that are marked as confidential, in order to meet legal obligations.

A1.8   Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Ofcom's approach on intellectual property rights is explained further on its website at http://www.ofcom.org.uk/terms-of-use/

Next steps

A1.9   Following the end of the consultation period, Ofcom intends to publish a statement in summer 2016.

A1.10   Please note that you can register to receive free mail updates alerting you to the publication of relevant Ofcom documents. For more details please see: http://www.ofcom.org.uk/email-updates/

Ofcom's consultation processes

A1.11   Ofcom seeks to ensure that responding to a consultation is easy as possible. For more information please see our consultation principles in Annex 2.

A1.12   If you have any comments or suggestions on how Ofcom conducts its consultations, please call our consultation helpdesk on 020 7981 3003 or email us at consult@ofcom.org.uk . We would particularly welcome thoughts on how Ofcom could more effectively seek the views of those groups or individuals, such as small businesses or particular types of residential consumers, who are less likely to give their opinions through a formal consultation.

A1.13   If you would like to discuss these issues or Ofcom's consultation processes more generally you can alternatively contact Graham Howell, Secretary to the Corporation, who is Ofcom's consultation champion:

Graham Howell
Ofcom
Riverside House
2a Southwark Bridge Road
London SE1 9HA

Tel: 020 7981 3601

Email Graham.Howell@ofcom.org.uk

Annex 2

Ofcom's consultation principles

A2.1   Ofcom has published the following seven principles that it will follow for each public written consultation:

Before the consultation

A2.2   Where possible, we will hold informal talks with people and organisations before announcing a big consultation to find out whether we are thinking in the right direction. If we do not have enough time to do this, we will hold an open meeting to explain our proposals shortly after announcing the consultation.

During the consultation

A2.3   We will be clear about who we are consulting, why, on what questions and for how long.

A2.4   We will make the consultation document as short and simple as possible with a summary of no more than two pages. We will try to make it as easy as possible to give us a written response. If the consultation is complicated, we may provide a shortened Plain English Guide for smaller organisations or individuals who would otherwise not be able to spare the time to share their views.

A2.5   We will consult for up to ten weeks, depending on the potential impact of our proposals.

A2.6   A person within Ofcom will be in charge of making sure we follow our own guidelines and reach out to the largest number of people and organisations interested in the outcome of our decisions. Ofcom's 'Consultation Champion' will also be the main person to contact with views on the way we run our consultations.

A2.7   If we are not able to follow one of these principles, we will explain why.

After the consultation

A2.8   We think it is important for everyone interested in an issue to see the views of others during a consultation. We would usually publish all the responses we have received on our website. In our statement, we will give reasons for our decisions and will give an account of how the views of those concerned helped shape those decisions.

Annex 3

Consultation response cover sheet

A3.1   In the interests of transparency and good regulatory practice, we will publish all consultation responses in full on our website, www.ofcom.org.uk.

A3.2   We have produced a cover sheet for responses (see below) and would be very grateful if you could send one with your response (this is incorporated into the online web form if you respond in this way). This will speed up our processing of responses, and help to maintain confidentiality where appropriate.

A3.3   The quality of consultation can be enhanced by publishing responses before the consultation period closes. In particular, this can help those individuals and organisations with limited resources or familiarity with the issues to respond in a more informed way. Therefore Ofcom would encourage respondents to complete their coversheet in a way that allows Ofcom to publish their responses upon receipt, rather than waiting until the consultation period has ended.

A3.4   We strongly prefer to receive responses via the online web form which incorporates the cover sheet. If you are responding via email, post or fax you can download an electronic copy of this cover sheet in Word or RTF format from the 'Consultations' section of our website at http://stakeholders.ofcom.org.uk/consultations/consultation-response-coversheet/.

A3.5   Please put any parts of your response you consider should be kept confidential in a separate annex to your response and include your reasons why this part of your response should not be published. This can include information such as your personal background and experience. If you want your name, address, other contact details, or job title to remain confidential, please provide them in your cover sheet only, so that we don't have to edit your response.

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title:

To (Ofcom contact):

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing ☐   Name/contact details/job title ☐

Whole response ☐   Organisation ☐

Part of the response ☐   If there is no separate annex, which parts?

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here. ☐

Name   Signed (if hard copy)