

Title:

Dr

Forename:

Sally

Surname:

Broughton Micova

Representing:

Self

Organisation (if applicable):

What additional details do you want to keep confidential?:

No

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

Question 1: Are there areas of Ofcom's overall strategic approaches and purposes (outlined in paragraphs 2.4 to 2.10 above) that may need to change?:

The strategic purposes set out in the 2014/15 annual plan remain largely still relevant and appropriate. Ofcom has done some excellent work towards those purposes. I suggest only a reconsideration of this one:

2.8 Despite effective communications markets providing a range of benefits for consumers, we continue to have backstop safeguards to protect consumers from harm. Recently our work in this area has included addressing mid-contract price rises.

With this phrasing it seems that the "harm" that is being conceived of is primarily connected to the potential impact of the business practices of communications companies in relation to pricing policies and service provision. I would like to see this reconsidered in the direction of

making it more inclusive of other types of "harm" that may come from communications companies' treatment of user data and, in light of RIPA, co-operation with security services and police and other practices. This could give Ofcom more space for possible co-operation with the Information Commissioner's Office or other institutions to further protect consumers.

Question 2: What are the issues and areas that should form Ofcom's priorities or major work areas in 2015/16?:

2.8 Despite effective communications markets providing a range of benefits for consumers, we continue to have backstop safeguards to protect consumers from harm. Recently our work in this area has included addressing mid-contract price rises.

Work area was to support industry and govt. initiatives to improve users trust in internet services as well as to work on priority areas such as nuisance calls and unexpectedly high bills. While as my colleague Claire Milne has noted (<http://blogs.lse.ac.uk/mediapolicyproject/2014/04/01/limited-action-to-combat-nuisance-calls-in-the-uk/>), progress has been made on nuisance calls, there is still work to be done. More focus on what network operators might do would be useful because of the number of callers/messagers coming from other jurisdictions. Also an investigation and possible publication of comparative consumer information or "seal of approval" type mechanism of the various blocking services on the market would also be beneficial.

The area in the 2014/15 plan related to trust in internet services is rather broad and can encompass a variety of initiatives. Perhaps through more specific areas or simply in further elaboration I would like to see emphasis on two areas. Firstly I would like to see more focus on the harm or potential harm faced by younger internet users. There is a risk of conceiving of consumers as adults and in harm as mostly financial or other distress because of corporate behaviour related to pricing or the provision of services. Ofcom's own research shows the extent to which young people are using the internet and the variety of devices they use to do so. The EUKidsOnline project and the Net Children Go Mobile project have both provided useful evidence about children perceive and experience risk and harm online that could be used as a starting point Ofcom to develop further UK specific research to contribute to debates in the UK and Europe. Secondly, I would like to see Ofcom look into the role and responsibilities of license holders and network operators regulated by Ofcom in relation to surveillance of communications data. The revelations about surveillance by security agencies and recent use of RIPA by the police have eroded trust in internet services. Ofcom could investigate consumer perceptions and knowledge and/or behaviour of operators to assess the potential needs for consumer information, any changes to license requirements or legislation.

2.9 We maintain audience confidence in broadcasting content through our licensing and enforcement activities, and by helping to ensure regulation is consistent with audience expectations of content standards such as in our research into attitudes to violence on TV.

This strategic purpose is core to Ofcom's existence in my view and in this coming year I would like to see this approached not just in terms of violence, obscenity, or those minimum content standards established by the EU's AVMSD and UK law, but also in terms of the

extent to which the diversity present in the UK's population is represented in and has access to on the airwaves. I urge Ofcom to make public the equity reports of the major broadcasters and to use its good offices to engage them in dialogue about employment and advancement conditions. I also suggest that Ofcom include in its work areas and priorities monitoring of content for diversity. My colleague Myria Georgiou, who does research in this area provided these examples that could be used as models.

This report of monitoring done by the French regulator <http://www.csa.be/diversite>: (2013), Image et représentation des enfants et des jeunes - CSA, Federation of Wallonia and Brussels

A barometer report and a guide of good practice developed by the Federation of Wallonia and Brussels on the representation of children and young people in the media. Children and young people are underrepresented on television and when they appear they rarely take centre stage and rather stay in the background of television representations. The Guide of Good Practice suggests that the media provide an invaluable tool for young people to develop a sense of fairness and to advance their participation in the society. The Guide offers specific advice of how to enhance youth's presence and participation in a mediated world. In French. csa.be/system/documents_files/2137/original/publ_baromètre_jeunes_2013_final.pdf?1383137071 (barometer)

csa.be/system/documents_files/2141/original/publ_guide_bonnes_pratiques_jeunes_2013_final.pdf?1382619615 (Guide of Good Practice)

(2013), La représentation de l'homosexualité dans les médias de la Fédération Wallonie-Bruxelles - CSA Fédération Wallonie Bruxelles

A barometer report on the representation of LGBT in the media in French-speaking Belgian media. The report starts with the recognition of the role of the media in informing the public about different identities, lifestyles and sexualities. While interpersonal relations play a key role in battling homophobia, the role of the media might hinder or enhance a better understanding of diversity when it comes to sexual orientation and LGBT issues. In light of the recognition of media's role, the report provides a systematic study of the different representations of homosexuality across a range of media in Wallonia and Brussels. www.csa.be/system/documents_files/2047/original/SD_20130513_rapport%20final_publ.pdf?1368707000

Question 3: Are there any specific areas for deregulation or simplification in the coming year?: