

*"Working for quality  
and diversity in  
British broadcasting"*



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## **Voice of the Listener & Viewer's response to Ofcom's Consultation on Measuring Media Plurality**

*Voice of the Listener & Viewer (VLV) is an independent, non-profit-making association, free from political, commercial and sectarian affiliations, working for quality and diversity in British broadcasting. VLV represents the interests of listeners and viewers as citizens and consumers across the full range of broadcasting issues. VLV is concerned with the structures, regulation, funding and institutions that underpin the British Broadcasting system.*

VLV welcomes the opportunity to respond to the request from Ofcom for comments on measuring media plurality

Voice of the Listener and Viewer (VLV) is responding to Ofcom's Consultation on Measuring Media Plurality. Ofcom has been requested by the Secretary of State (Culture, Media and Sport) to provide advice on media plurality. The issues involved in the concept of media plurality are complex ones and VLV is very concerned that Ofcom has been given such a short period of time within which to seek the public's responses and prepare its own advice. VLV is worried that the Secretary of State may be contemplating proposing changes to the current regulations on media plurality without the necessary and extensive consideration which ought to precede and inform any possible changes.

Given the short window for public consultation VLV is only able to outline some of what we believe to be the key issues involved in media plurality. This submission will address some of the questions set out in Ofcom's request for consultation. Our first area of concern is in the request to respond to the question

### **What are the options for measuring media plurality across platforms ?**

VLV would wish to define questions of media plurality not simply in terms of the numbers of providers, channels, publications or websites available in the market place but rather in terms of the range, quality and accessibility of content. We would accept and endorse the arguments made by Dr Des Freedman (Goldsmiths, University of London) in his *A Note On Plurality* submitted to Ofcom in relation to the public interest test and in the context of the proposed acquisition of BSkyB by News International. Dr Freedman distinguishes what he terms competing definitions of plurality:

The first...is a very narrow understanding of plurality that is largely related to a quantitative measure of media sources and outlets; the second is a more expansive definition that relates to the existence of a sufficient number of distinctive organisations such that the circulation of diverse viewpoints to citizens can be guaranteed.

VLV strongly believes in the importance of the media for us all as citizens and not simply in terms of the amount of media available in the market place. As Dr Freedman argues of the 'narrow' definition:

...pluralism is here understood as referring to the simple availability of consumer choice rather than the actual contribution such outlets and services make to the diversity of the media landscape.

VLV was heartened by Lord Patten's view of broadcasting and the BBC as set out in his RTS Fleming Memorial Lecture (6 July, 2011)

I think the BBC is a core part of our civic humanism in this country. What do I mean by civic humanism? I mean our sense of shared citizenship, regardless of our different backgrounds. I mean the understanding that citizenship is underpinned by a common set of values, a common conversation and an acceptance of mutual responsibility for our individual and collective welfare.

How does the BBC fit into that? By providing a public space for argument and creativity. By being a party to the public's engagement with democracy. By allowing citizens to test the trustworthiness of the information they get from those in authority. And beyond politics, by connecting different people and different communities to one another in all sorts of other ways. From *East Enders* to the Proms. From Glastonbury to the new initiative that has put 200,000 of the nation's oil paintings online.

VLV believes that this concept of a civic role is important across media outlets and not only relevant in the case of the BBC. We therefore see a crucial role for Ofcom in ensuring a plurality of media sources of information and cultural experience. Lord Patten went on to comment on the need for ensuring a range of provision:

We should also listen hard to those who accuse us of drowning our viewers and listeners in a small metropolitan pond of stereotypes and prejudices, what Flaubert called "received ideas". The customarily "unreceived" deserve to be considered and reflected too. And audiences in every part of the UK should feel the BBC is relevant to their everyday lives.

Prior to the passing of the 2003 Communications Act the Department of Culture, Media and Sport, in its consultation on ownership rules, also made a useful contribution to this debate about plurality and we endorse these views:

A plurality of ownership should secure a plurality of sources of news and editorial opinion ....A healthy democracy depends on a culture of dissent and argument, which would inevitably be diminished if there were only a limited number of providers of news.

We also note the comments made by Patricia Hodgson in 2008 when she pointed out the complex relationship between the principle of diversity on the one hand and the sense of shared values on the other, and expressed the view that this relationship was now at risk:

... so much choice and nothing to watch...We seem to be losing genuine intellectual diversity and a shared cultural experience of which we can all feel proud. (*The Price of Plurality*: 46)

Above all we wish to emphasise the importance of qualitative as well as quantitative analysis and think it is vital that public policy makers are able to 'drill down' to the level of content in order to assess the actual diversity (or stereotypical sameness) of specific content examples. It is not sufficient, in our view, to restrict analysis to the counting of numbers of owners, important though this is. It is also important to take account of the characteristic behaviour and objectives of different sorts of owners, of the role of regulation and of the distinctive operation of public service communicators such as the BBC who – whatever their faults may be – are structurally independent and not subject to proprietor power and influence.

In the case of both press and broadcasting the appropriate regulatory bodies should have a duty to undertake periodic reviews of diversity of content as well as of ownership so that there can be appropriate public interest mitigation of the tendency towards concentration of ownership.

### **News and current affairs have been established as key genres particularly critical for informing democracy. Should other genres be considered?**

VLV agrees that news and current affairs – but also documentary - are crucial genres for supporting democracy. We are concerned that there appears to have been a decline in the amount of documentaries and current affairs programmes broadcast on television in recent years, especially on the commercial PSB stations. VLV would argue that the availability of a range of genres is important, including drama, comedy and even, in some instances, light entertainment , especially where these involve content produced within the national culture. VLV has long expressed concern at the declining level of UK produced content in many areas of programming, including children's television. Such content can, as Lord Patten argues, contribute to the connection and fostering of civic culture. There is a real danger that if plurality is conceived primarily in terms of number of channels or outlets that many of these may have a very similar range of content , often being syndicated or repeated, and that such channels will not have the budgets or the interest in producing material that is challenging and thought-provoking about contemporary issues.

### **How might the market evolve in future and how might this affect options for measuring media plurality across platforms?**

### **Are there any regions, areas or audiences (such as the devolved nations) which may require separate considerations and why?**

VLV has linked these two questions as they both relate to perhaps the most complex dilemmas relating to plurality of media provision. At a time when the devolved nations are increasing in significance and are questioning traditional approaches to the financial control of resources, there is a desire for a different organisation of media which would more easily address the issues involved. In terms of local or even regional government and administration there is even more of a mismatch between this tier of public life and the media provision to monitor , comment and debate policies and problems.

There has been a perceived decline in local newspapers over a number of years. One consequence of this has been the merger of many local newspapers into chains where the local element of a paper is minor compared with shared general content (A contributing factor to this process has been the possibility of having common marketing and advertising staff across such chains). However the migration to the internet of many types of classified advertising has proved a disaster for many local newspapers.

Consequently there has been growing consideration of whether this increasing decline in local press could be countered by some new form of cross-media organisation drawing together internet, television and radio, together possibly with print. Whether agreed or imposed the Government has required the BBC to set aside part of its Licence Fee income to support the establishment of some local television services.

VLV is sympathetic to the need to ensure that local, regional and devolved national interests and issues are adequately covered through the media to better enable citizens to be informed about their local democratic governments and enabled to participate more fully. However there are a number of aspects of media pluralism which are potentially involved and which need much fuller and clearer exploration than they appear to have received. One such question is what would be the relationship between the BBC and any new local media consortia funded, at least in part, by the Licence Fee. Any new media or new 'local television' is presumably intended to be commercial in generating revenue, possibly from advertising whether on the web, radio or local television. The BBC is not a profit making organisation and does have a duty to support the principle of universal access. So, for example, would customers/citizens be charged for access to websites?

One of VLV's concerns about recent developments is that BBC local radio is being deprived of funds and possibly weakened by being expected to broadcast shared content from neighbouring regions. It is arguably the case that such economies are being made in order to under-write the costs of competing, commercial local television.

Another of VLV's concerns is the likely quality of such possible local news gathering operations. There is already some evidence in the field of news-gathering of what is known as 'churnalism'. News providers have been forced to work with diminishing resources and consequently reduced staffing. As a result, journalists are increasingly reliant on 'ready-made' sources, handouts provided by organisations through their PR services etc. Such journalists do not have the time and possibly lack the expertise for independent news-gathering or investigative journalism. Yet if local news is to serve its prime function of holding local authorities to account it is crucial that it has the resources with which to do so.

Consequently VLV would wish to see a wide-ranging and fully informed public debate about how any possible new cross-media provision of news services might be organised, financed and operated to ensure it serves its civic purposes. If such services are thought to be essential then it may be that some form of public financial subsidy is necessary -not robbing the BBC of its funding but finding other mechanisms.

### **Should the framework for measuring levels of plurality include the BBC?**

VLV recognises that the BBC will be an important element in any overall consideration of media plurality. However VLV believes that the BBC is already adequately regulated in terms of its content provision through its oversight by the Trust and also the House of Commons Select Committee. VLV believes that it is crucial for the safeguarding of effective plurality of media provision for Ofcom to regulate the commercial media in the manner it has done since its establishment.

15 November 2011

# Cover sheet for response to an Ofcom consultation

## BASIC DETAILS

Consultation title: **Media Plurality**  
To (Ofcom contact): **Ben Clarke**

Name of respondent: **Robert Clark**

Representing (self or organisation/s): **Voice of the Listener & Viewer**

Address (if not received by email): **info@vlv.org.uk**

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Name **Robert Clark, Honorary Secretary**