

Channel 4 response to Ofcom's consultation on its proposed media plurality measurement framework

Channel 4 welcomes the opportunity to respond to Ofcom's consultation on its proposed media plurality measurement framework.

Channel 4 is a publicly-owned, commercially-funded public service broadcaster, with a statutory remit to be innovative, experimental and distinctive. Unlike the other commercially-funded public service broadcasters, Channel 4 is not shareholder-owned: commercial revenues are the means by which Channel 4 fulfils its public service remit. In addition, Channel 4's not-for-profit status ensures that the maximum amount of its revenues are reinvested in the delivery of its public service remit.

As a provider of high-quality news and current affairs content on broadcast television and online, Channel 4 plays a crucial role in contributing to a vibrant and plural media landscape in the UK. We have engaged extensively with the public policy debate on media plurality in recent years, and have outlined our views on broader plurality issues in previous submissions to Ofcom and DCMS on the scope and focus of plurality in the UK. We support public policy intervention to sustain sufficient levels of plurality, and believe that any cross-media approach to measurement needs to be workable and clearly defined, with a focus specifically on news and current affairs content.

This submission focuses specifically on Ofcom's proposed media plurality measurement framework. We welcome efforts from Government and Ofcom to develop a measurement framework for media plurality to enable a future market analysis of plurality in the UK, which will help to ensure that UK audiences continue to benefit from a diverse range of news voices across different platforms.

Channel 4 broadly supports the draft framework and agrees that, in the absence of a single cross-platform standard industry measure, a range of different metrics should be used to assess levels of plurality in the UK. As such, we support the inclusion of metrics relating to audience reach and share of consumption, as well as consumer levels of personal importance in news content by source and platform. Specific comments on aspects of the proposals are outlined in further detail below.

Channel 4 in a plural media landscape

Channel 4 believes plurality is a vital aspect of the media landscape in the UK, ensuring audiences are exposed to a diverse range of viewpoints from a number of distinctive media enterprises and on different platforms. This remains a crucial element of any healthy democracy and informed society.

Within broadcasting itself, plurality is underpinned by a sophisticated ecology whereby dedicated public service broadcasters (PSBs) exist alongside commercial broadcasters, each with different target audiences and, in turn, editorial focuses and distinctive content. A range of models and remits also exists within the public service broadcasting framework itself, further encouraging a broader range of voices and tone between Channel 4, BBC, ITV and Channel 5.

Channel 4 plays a hugely important and distinctive role in strengthening plurality within the media industry, providing a wide range of news and current affairs programming across different formats and commissioning strands. Our acclaimed news programme – *Channel 4 News* – continues to play a unique role in broadcast news as the only hour-long in-depth news bulletin in the UK, placing particular emphasis on international coverage and investigative journalism. The programme, produced by ITN since its inception, has won the RTS Daily News Programme of the Year Award two years running, in recognition of its ‘strong and authoritative journalism’, as well as two successive International Emmy’s for its coverage of the Syrian war.

Alongside this news coverage, Channel 4 is also committed to providing audiences with a diverse range of current affairs programming each year, aimed at analysing and interrogating news developments both in the UK and abroad, and providing insight into areas of life that viewers wouldn’t otherwise be aware of.

We seek to deliver this content through different programme strands and formats, most notably through our investigative journalism series *Dispatches* – covering issues from income inequality to illegal immigration – and international affairs series *Unreported World*, which documents aspects of life in all corners of the world, including recent films from Siberia, Sierra Leone and Honduras.

Channel 4’s on-screen news and current affairs coverage is complemented by a wide range of supporting multi-platform content. *Channel 4 News*, for example, has a strong online presence, having won four awards at this year’s Online Media Awards for its in-depth analysis of news developments on its website and dedicated app, while *Unreported World* continues to innovate in its use of short online clips that run alongside the on-screen series. We welcome Ofcom’s inclusion of this distinctive online content within its proposed framework.

Our commitment to providing distinctive and engaging content in this area is further underpinned by our public service remit requiring Channel 4 to promote alternative views and new perspectives, as well as our publisher-broadcaster status which ensures that we work with a wide range of independent production companies from across the UK, each with their own tone and approach to programming in this area. Channel 4’s unique model is a critical factor in fulfilling its remit and supporting plurality. We therefore agree that the contextual factors identified by Ofcom will be an essential component of any measurement framework.

Diverse audiences

As outlined above, Channel 4 supports the range of metrics that Ofcom is proposing for future measurements of media plurality in the UK, and believes that there are strong advantages in looking both at the number and range of media enterprises in existence as well as their relative ability to influence and inform public opinion.

In establishing such a framework, we believe that it is important that Ofcom is mindful of the diversity of the UK population as a whole and, in turn, the diverse makeup of consumers of news and current affairs.

As a public service broadcaster with a remit to “*appeal to the tastes and interests of a culturally diverse society*”, Channel 4 plays an important role in connecting with traditionally hard-to-reach audiences, in particular younger and black and ethnic minority (BAME) viewers. In 2013, for example, *Channel 4 News* attracted more 16-34 year old (18%) and BAME (13%) viewers as a proportion of overall viewers than any other public service broadcaster.

In addition to ensuring that a wide range of viewpoints are available and consumed by the general population, Channel 4 believes that an important aspect of any plural media system is ensuring that different and diverse audiences are well served by the current framework.

While single metrics such as reach and share can provide insight into the overall consumption of different viewpoints across an overall population, we would recommend that Ofcom ensures that the extent to which different demographics consume news in the UK – in particular those often regarded as less engaged in news developments – forms part of the framework.

We recognise that Ofcom’s annual *News Consumption in the UK* report analyses consumption across a range of demographics and believe that a similar approach within its proposed ‘reach’ metric would provide valuable insight in any measurement of media plurality.

Role of independent production sector

As outlined in Channel 4’s submission to the Department for Culture, Media and Sport’s consultation on media ownership and plurality, Channel 4 supports the inclusion of both wholesalers and retailers in the plurality framework. This allows the framework to recognise that significant editorial differences between news bulletins provided by one wholesaler do exist – including, for example, between *Channel 4 News* and ITV’s news bulletin, which each have their own distinctive style and tone despite both being produced by ITN.

Channel 4 believes that it is important that the framework takes a broad view of suppliers at both the wholesale and retail level, in particular in relation to the role of the independent production sector in producing programming for the news and current affairs genre.

As a publisher-broadcaster with no in-house production, Channel 4 commissions all its content from the independent production sector. In 2013, for example, we invested £429 million in original UK content from 367 creative partners in TV, digital and film, including 240 independent television production companies.

This diversity of supply is reflected in our approach to current affairs programming, where we work with a range of independent production companies from across the UK on all our commissions in this genre. We adopt this approach both for individual commissions as well as for long-running strands, with a number of companies – including Nine Lives, Blakeway Productions, Voltage TV, and ITN Productions – working on programmes for *Dispatches*.

Similarly, *Channel 4 News* routinely engages with a vast range of individual film makers and larger production companies as part of its hard-hitting investigations on the evening bulletin and online. For example, independent production company Firecrest Films worked alongside

staff at ITN in its well-documented investigation into Lord Rennard last year, while its dedicated Film Fund has worked with numerous individuals from across the globe, including with film-maker Konstantinos Georgousis on his exposé of the racial prejudice of the Greek political party Golden Dawn.

This engagement with a wide range of production companies and film-makers, from both the UK and abroad, helps to further strengthen Channel 4's contribution to media plurality, with each organisation reporting news and current affairs issues in their own unique style, format and tone.

Channel 4 believes that it is vital that any media plurality measurement framework takes into account the diversity of supply within broadcasters – as well as between them – when analysing the range of voices available to the UK population, and recognises the positive influence of the independent production sector in increasing plurality within media organisations.

December 2014