

This submission is being made by *Belong* - the Cohesion and Integration Network. *Belong* is a national charity set up to promote cohesion and is focused on policy and practice. Membership is open to private, public and voluntary sector agencies. Our website provides an indication of the work we do (www.belongnetwork.co.uk) and there are a number of publications which highlight the great importance of communications to cohesion

Our response

We wish to make a number of points about the need for the impact assessment guidance to take account of the impact of all forms of communications on social cohesion, nationally and locally, and in relation to specific groups. All such considerations seems to be absent from the proposed guidance.

The proposed guidance clearly aims to take account of equality and inclusion. However, there is no suggestion that the guidance will consider the way in which different communities and groups relate to each other. While it may be assumed that communications that promote hatred or incite violence would fall foul of the law, provocations can be more insidious, with communities liable to experience false claims about their attitudes and behaviours. As we saw in the recent disturbances in Leicester, these claims are part of a pattern of abuse, designed to create tensions between groups and can quickly escalate into disorder and violence.

Social media has proved quite easy to manipulate in this way and for those aged 16-24 and for ethnic minority groups, on-line information is the most significant, with 82% of those aged 16-24 using the internet for news, compared to just 57% that use television. For ethnic minority groups, 73% use the internet for news and 69% use television. At the same time, regulated and impartial sources have declined as sources of news and information.

We would also suggest that Ofcom should also be much more mindful of 'place' and that the impact assessment should have regard to local areas as well as national perspectives. The impact of communications, of all types, can be much more profound when considered in relation to particular areas. In this regard, we would like to record our concern over the decline - and loss - of some local impartial sources of information, especially regional and local newspapers and radio. This means that it is much more difficult to counter the negative and divisive voices which are taking their place. In those areas, which are known to be experiencing local tensions, Ofcom should be prepared to consider how it might promote, or even require, ways in which impartial voices can be developed and provocative misinformation countered, especially in relation to substandard practices within the communication industry. In this context, the diminished role and reach of trusted and impartial sources, especially local radio and the local print media is a cause for concern and Ofcom should seriously considered how these information sources might be restored or developed in the future.

We also believe that the impact assessment process should also be considered as a partnership activity in which both press and media organisations, as well as Ofcom, conduct impact assessments on a shared basis, in relation to the particular circumstances in each area.

The impact assessment proposed gives little indication as to how data will be collected and from what sources, nor how those sources are validated. A partner approach is much more likely to mitigate the risk of biased or incomplete data and as a partner in the assessment process, Ofcom can then help to develop a trusted local partner status. The partnership would include the police and local councils, as well as other statutory bodies and local voluntary agencies. This will provide Ofcom with a much more informed and realistic picture of the likely impact of communications. This seems pertinent to *Belong's* new community of practice 'Shared Ground' which is aimed at local partners who can then be better placed to understand and respond to the information and intelligence which is shared between partners. We hope that Ofcom will find a way to engage with this community of practice.