

Ofcom Consultation on Ownership and Plurality in the UK Media

A response from the Ofcom Advisory Committee for Scotland

What are the options for measuring media plurality across platforms? What do you recommend is the best approach?

We recommend that the best approach is to focus on levels of diversity of ownership and control of the main owners through which media content is consumed. A relevant measure would be owners' share of voice - as measured both by the time and the money spent by consumers –on the main delivery platforms for media: television, radio, newspapers and the internet.

ACS has consistently taken the view that the media market in Scotland should be considered to be quite distinct within the UK. UK-wide media are available to Scottish consumers (with variants for TV opt-outs and press editions). There is also a distinctive Scottish media landscape in respect of all the media noted above. Any plurality test needs to be applied separately to media circulating in Scotland specifically for Scottish audiences as well as to UK media.

Is it practical or advisable to set absolute limits on news market share?

News media play an important role in democratic opinion formation and in informing the public. The Scottish public has a dual relationship to news. It consumes news that is specifically Scottish and that is relevant to the conduct of the Scottish political institutions and the Scottish public domain more widely. The Scottish public also consumes news that has a wider UK focus and that is relevant to Scots as citizens of the UK. Market share in news provision at both of these political levels needs attention to ensure at least minimal levels of diversity. The question of diversity is relevant not only from the point of view of news and information but also for the representations of culture and to promote tolerance and solidarity. From the standpoint of Scotland, diversity of representation needs to occur north of the border but it is also important that Scotland be adequately represented within the UK, as should be the case with all the other nations and regions within the British state.

As noted earlier, clear limits on ownership should be established for each major platform across all platforms. Subject to regular review, this is both practical and highly advisable so as to ensure adequate diversity of opinion in the news media.

What could trigger a review of plurality in the absence of a merger, how might this be monitored and by whom?

There is a case for a routine review of plurality. New providers (such as local TV or a Scottish Digital Network [SDN]) are likely to appear in coming years and it is difficult to foresee their impact on the overall media ecology in advance of their development. Other media organisations may change levels of service provision (e.g. through cuts coming through the licence fee, as in the case of the BBC) or they may go out of business. Mergers, then, are only one possible way in which the overall landscape may change so

there needs to be systemically embedded alertness to other possibilities. We recommend that Ofcom review the situation every five years, with specific reference to the Scottish media market as well as to the UK market as a whole.

Could or should a framework for measuring levels of plurality include websites and if so which ones?

ACS considers that the internet is a major avenue for media consumption. It is likely to grow with the development of greater connectivity and the enhanced capabilities of new devices. New actors have entered the Scottish scene, such as The Caledonian Mercury, Newsnet Scotland, STV's local sites. These operate alongside the BBC's provision (set to be reduced) and the sites of the major newspapers (some of which may well set up paywalls, along the lines presently indicated by The Herald). Share of voice could be measured by evaluating owners' proportionate share of total time spent on the most popular websites. A list would need to be established at the start of each period of review.

Whether or how it should include the BBC?

The BBC is a major player in Scotland, whose role has been regularly discussed in public debate. At present, via the licence fee it is the sole publicly funded PSB north of the border, a situation that could change if an SDN were to be launched. No framework for assessing levels of media plurality would be complete without taking into account the share of voice of the BBC – BBC Scotland, north of the border.

The BBC (BBC Scotland) should be included for the purposes of assessing the total extent of the radio, television and online markets in Scotland. That said, as a PSB run on the principle of impartiality and with the public as a whole as its stakeholders, the BBC should not be subject to the restraints on share of voice applied to commercial media providers.

***Ofcom Advisory Committee for Scotland
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