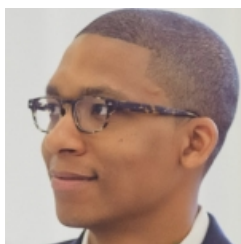


Ofcom's Plurality Framework: A step in the right direction, but still unfinished work



Following the recent publication by Ofcom of its **measurement framework for media plurality**, LSE Research Officer Sharif Labo argues that although there are significant gaps in the framework, it offers a solid foundation to measure plurality in a fast-changing media environment. The UK Parliament, in consultation with Ofcom, must now use the opportunity of the first baseline assessment to set out 'bright line' guidance on what constitutes sufficient plurality, as well as to explore steps to gain more insights into how technology is impacting news consumption. Damian Tambini and Sharif Labo's policy brief, *Monitoring Media Plurality after Convergence*, can be read [here](#).

Assessing the framework: a good first step

Ofcom's **new plurality framework** offers a solid foundation from which to measure plurality. Are there gaps? Yes. Is it fool-proof? No. Nonetheless, as a first step towards understanding plurality in what is a fast-moving digital news landscape, it represents progress on Ofcom's **previous work**.

Some critics might point to the time it has taken for Ofcom to get to this stage, but by consulting with industry and researchers, Ofcom has developed its thinking considerably (for example, by now including a separate categorisation for digital intermediaries such as Facebook). It has 'future proofed' the framework by recognising that it will need to be reviewed periodically to account for a different media environment in the future. Relative to other **European attempts to grasp** how online plurality should be measured, the framework is probably one of the more advanced.

A Trade-Off: Platform Accuracy versus Comparability

Ofcom's quantitative framework within the news and current affairs category is split into three categories: availability, consumption, and impact of voices. However, it is consumption that is the primary metric, and the one that offers "**the most useful starting point of any plurality assessment**". Ofcom's primary consumption measure, the bespoke **Share of References (a cross-media metric designed to measure the share of individual news sources consumed across all platforms)**, has come **under criticism** due to its reliance on viewers' claimed behaviour. The expectation that people can accurately recall and report their interactions with news consumed over multiple devices, platforms and brands numerous times per day, concerns **some academics**. Indeed, well known drawbacks associated with self-reporting, such as **user bias and measurement errors**, are likely to be exacerbated in this environment.

Justin Schlosberg has suggested that a more reliable system of measurement would involve the use of more accurate platform-level analytics and industry-standard metrics, from commercial providers such as **Comscore** for the web, and Broadcasters Audience Research Board (**BARB**) and Radio Joint Audience Research (**RAJAR**) for TV and radio respectively. However, this suggestion misses two fundamental challenges: first, that **consumers multi-source news across platforms**; and second, that most major publishers are active across radio, internet, TV and print. To calculate audience share therefore requires computing consumption across each platform on which consumers and publishers are active, and combining the results. In the absence of such a 'multi-platform' view, indicators that may be accurate individually could be highly misleading in aggregate.

The 'more accurate' industry measures cited above are all compiled differently. In the UK, radio audiences are measured by **respondents completing listening diaries**; TV audience shares are

measured by **sampling UK TV-watching households**; while visits to websites are measured by cookies (small text files) measured at a census level. It is true that using claimed behaviour surveys to measure increasingly complex multi-sourcing consumption is likely to increase measurement errors and biases. This is why on balance, Ofcom's decision to employ industry standard metrics as a check on claimed behaviour offers a fair compromise when faced with the choice of platform accuracy on the one hand, and comparability on the other.

What is Sufficient Plurality?

One of the key challenges is that it is for Parliament and ministers, not Ofcom, to determine what is 'sufficient' plurality, and there is currently no guidance. Without this, it is unclear what the whole framework is ultimately aiming for. This lack of 'bright lines' brings subjectivity into what already can be **highly political decisions**. Bright lines need not be hard targets, but could be incorporated into the framework that Ofcom has put forward, specifically considered together with the **qualitative contextual factors in the framework such as internal plurality and governance models**. Indeed, based on its **2012 report**, Ofcom appears to have previously been *in favour* of guidance about what constitutes sufficient plurality. It is unclear why Ofcom has backed away from this advice. Without it, a level of market uncertainty will be introduced to the investment decisions of media companies that fall under the scope of plurality reviews. The effect of this could be seen to work against a diversity of voices, if this uncertainty precludes investment in quality content and newsgathering where it is needed.

A Baseline Assessment to 'Kick the Tires' on the New Framework

The Government requested a measurement framework for plurality to enable it to **perform the first ever baseline assessment**. It should proceed with this. This will provide a valuable opportunity to 'kick the tires' on the new framework and assess it in practice. It will also provide an opportunity for government – with advice from Ofcom – to introduce sufficiency guidelines into the framework.

There are other areas where the framework could have been improved. Policymakers still have limited understanding of how consumers are using the internet to read and find news due to the paucity of available data. Ofcom could have recommended the set-up of an industry body that would require major publishers and intermediaries to release proprietary data on their role in news distribution and consumption whilst respecting consumer privacy and commercial sensitivities. It should have looked at introducing longer-term, broader research that looks beyond consumption metrics to the more nuanced ways that technology is impacting plurality (and the ultimate end goal of plurality: democracy). It might also have set out broad public **expectations on intermediaries** that are not directly involved in newsgathering and production. Finally as digital takes a larger share of media diets, Ofcom will need to **comprehensively review existing media ownership rules** to incorporate online media into this framework.

Having said all of this, we should also recognise that the framework Ofcom has developed does offer a solid foundation for measuring plurality. In increasingly complex media ecology, silver bullets are hard to come by. The shortcomings identified should be addressed logically as the next step after the first baseline assessment.

This post gives the view of the author and does not represent the position of the LSE Media Policy Project blog, nor of the London School of Economics and Political Science.

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