Executive Summary
Media Pluralism Monitor Pilot Test: United Kingdom

Prepared by Robert G. Picard and Jelena Dzakula

Reuters Institute, University of Oxford

Media pluralism, as a policy objective in democratic societies, aims at ensuring citizen access to a variety of information sources, opinions, and voices, and at reducing undue influence of dominant opinion, government, or individuals in forming public views. There are no singular methods or policies for pursuing pluralism because they must be adapted for domestic conditions, culture, history, and political systems. Media pluralism can be pursued through competition, industrial, cultural, and media policies, and policies governing electoral information and practices.

Development of the Media Pluralism Monitor

The Media Pluralism Monitor has been developed in response to concerns of the European Parliament and the Council of the European Union regarding pluralism in member states and Europe as a whole. Initially, the European Commission authorised an independent study on how to best measure pluralism and assess risks in 2008-2009, 'Indicators for Media Pluralism in the Member States—Towards a Risk-Based Approach'. That research developed a risk-based monitoring and diagnostic tool aimed at identifying potential risks to media pluralism by using a broad range of indicators across socio-political, economic, cultural, and legal dimensions and different media platforms. In 2014, EC commissioned a pilot study to implement the Media Pluralism Monitor in Belgium, Denmark, Estonia, France, Greece, Hungary, Italy, and the UK. It is based on a slightly modified version of the 2008-2009 method. The research was coordinated by the Centre for Media Pluralism and Media Freedom at the European University Institute, and the Reuters Institute, University of Oxford, undertook the UK portion of that study.

How the Media Pluralism Monitor Works

The study employs a risk-based assessment that focuses on systemic and component risks, concentrates on factors and elements where problems are most likely to appear, and analyses the impact of those risks. The method does not determine whether pluralism exists or the extent to which it exists. It identifies and measures risks to pluralism resulting from policies/lack of policies, media-government interactions, the supply of public affairs content, distribution systems, and the use/consumption of media. If areas of concern are identified, policymakers can focus attention on those areas, consider mitigating factors, and determine whether policy action is warranted.

The pilot test assesses 34 major policy/legal, economic, and socio-political indicators. These include 241 sub-indicators that are applied across different media platforms, assess the implementation of regulatory provisions, and delve more deeply into elements of the umbrella indicator. The Monitor scores risk on a three-point scale. Low risk indicates no follow-up or action is necessary. Moderate risk indicates attention is warranted and that actions or measures may be required. High risk specifies significant and immediate attention is required and that actions or measures may be necessary.

Indicators Used in the Media Pluralism Monitor Pilot Test

Policy and legal indicators

1. Regulatory safeguards for freedom of expression
2. Regulatory safeguards for right to information
3. Recognition of media pluralism as policy objective
4. Regulatory safeguards for journalistic profession
5. Regulatory safeguards for independence of media regulators
6. Policies and support for media/digital literacy
7. Safeguards for access to airtime on PSM by the various cultural and social groups
8. Regulatory safeguards for minority and community media
9. Regulatory safeguards ad policies for regional and local media
10. Regulatory safeguards for locally oriented and produced content on PSM channels and services
11. Regulatory safeguards for universal coverage of the media
12. Regulatory safeguards against high horizontal concentration of ownership or control in media
13. Regulatory safeguards against high degree of cross ownership between television and other media
14. Regulatory safeguards for transparency of ownership and/or control
15. Regulatory safeguards for fair, balanced and impartial political reporting in television
16. Regulatory safeguards against excessive ownership and/or control of media by politicians
17. Level of independence of PSM governing bodies and representation of political groups in parliaments on these bodies
18. Regulatory safeguard for the distribution of public interest channels on cable, DSL, and/or satellite platforms
19. Regulatory safeguards for objective and independent allocation of financial resources to PSM
20. Net neutrality policies

Economic indicators

1. Ownership concentration in media and platforms (revealed through a top-4 firm analysis by medium)
2. Audience and readership concentration
3. Number of sectors in which leading firms/owners are active (revealed through a top-8 firm analysis of revenue across all sectors compared to total revenue across all sectors)
4. Availability and quality of broadband
5. Minority and community media market presence
6. Centralization of national media system

Socio-Political Indicators

1. Guarantees for access to media for special needs groups
2. Guarantees for universal coverage of PSM and broadband
3. Political bias in the media
4. Political control over ownership of media and distribution networks
5. Political control of media advertising funding
6. Presence of professional associations advocating for editorial independence and professional standards
7. Level of independence of PSM financing
8. Independence and ownership of news agencies

UK Performance on the Media Pluralism Monitor

The UK scored reasonably well overall, with low risks on the majority of indicators, but with concerns raised by 38% of the indicators.
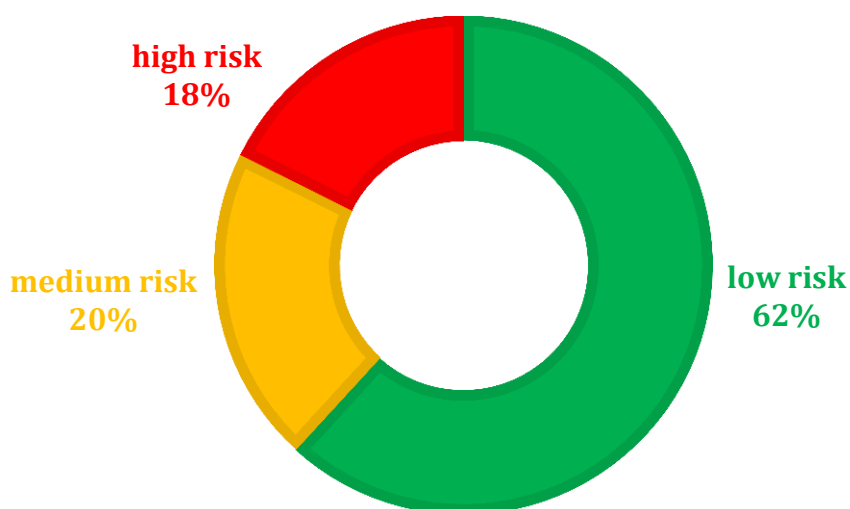
The United Kingdom has a well-developed legal and regulatory framework related to media and media pluralism, governed by the rule of law and independent judicial oversight, and generally exhibits effective implementation and processes. The United Kingdom protects freedom of expression, affords information access, provides for independent media and competition regulatory authorities, maintains specific media pluralism and competition policies, regulates cross-ownership involving operators of broadcast channels, and requires political impartiality in broadcasting. The majority of policy/legal indicators showed low risk in the UK, however, some revealed certain issues that should receive attention and consideration by policymakers. These involve safeguard policies for public service media (PSM) governing bodies, net neutrality, journalistic protections, PSM access for cultural and social groups, local public service, and ownership/control of media by politicians.

High economic risks to media pluralism were identified by the assessment due to   high concentration of media ownership and audiences serviced, and high cross-media ownership concentration. Medium risks were evident because of limited minority and community media, and current nationwide availability and quality of broadband services.

The study revealed few significant risks to media pluralism related to socio-political factors in the UK. There is a relatively good provision of access services for audiences with special needs, universality of broadcast and broadband services is pursued, and politicisation of media tends to be present only in the national press. The UK does, however, exhibits moderate risk resulting from political bias in media, and potential political control of media advertising funding.

Risk areas requiring attention

13 indicators revealed risks that deserve attention from UK policymakers and regulators.

Medium risks identified
Seven of the Monitor's indicators revealed medium risk to media pluralism in the UK:

- Regulatory safeguards for journalistic profession
- Level of independence of PSM governing bodies and representation of political groups in parliaments on these bodies
- Net neutrality policies
- Minority and community media market presence
- Availability and quality of broadband
- Political bias in the media
- Political control of media advertising funding

High risks identified
Six of the Monitor's indicators reveal high risk to media pluralism in the UK:

- Safeguards for access to airtime on PSM for various cultural and social groups
- Regulatory safeguards for locally oriented and produced content on PSM channels and services
- Regulatory safeguards against excessive ownership and control of media by politicians
- Ownership concentration in media and platforms
- Audience and readership concentration
- Number of sectors in which top 8 firms/owners are active

Understanding and responding to those risks
The medium and high risks identified need to be considered in terms of the underlying pluralism concerns the indicators address and whether mitigating factors or actions, such as extant policy or regulation, are already in place to address the risks or changes are underway that will ameliorate the concerns.

The Monitor merely identifies issues for consideration and does not assert specific solutions to the concerns raised by the assessment

For more information contact:
Robert G. Picard, Research Director
Reuters Institute for the Study of Journalism
University of Oxford
13 Norham Gardens
Oxford OX26PS
United Kingdom