Chapter 10

United Kingdom

Economic challenges, market consolidation and increasing professional insecurity

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Introduction

The UK is one of Europe's most populous countries, with 66.7 million inhabitants. The country is composed of four nations – England, Northern Ireland, Scotland, and Wales – of which England is by far the largest, with over 80 per cent of the country's total population. Scottish Gaelic and Welsh are the largest minority languages and receive significant coverage in the media, although Scots, Ulster-Scots, Irish, Manx, and Cornish are considered minority languages by the European Charter for Regional and Minority Languages. The UK has a large and diverse media landscape, with national media almost entirely based in the largest metropolitan area, London; however, there are distinct media markets in each of the four nations and a widespread local news industry. Politically, the UK is considered a constitutional monarchy and a parliamentary democracy.

Freedom in the World 2021: status "free" (Score: 93/100 in 2020) (Freedom House, 2021).

Liberal Democracy Index 2020: the UK is placed in the Top 10% bracket – rank 14 of measured countries (Varieties of Democracy Institute, 2021).

Freedom of Expression Index 2018: rank 12 of measured countries, down from 8 in 2016 (Varieties of Democracy Institute, 2017, 2019).

2020 World Press Freedom Index: rank 35 of 180 countries (Reporters Without Borders, 2020).

Since World War II, the UK has generally been a two-and-a-half–party system, with the Labour Party and the Conservative Party enjoying spells in government, and the Liberal Democrats (Liberal Party until 1981, SDP-Liberal Alliance between 1981 and 1988) playing a significant role as a third force. The

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first-past-the-post electoral system traditionally favours the two largest parties. A different set of parties contests elections in Northern Ireland, and Scotland and Wales have nationalist parties in the Scottish National Party (SNP) and Plaid Cymru, respectively. After referendums in 1997, powers were devolved to national legislatures in Northern Ireland, Scotland, and Wales. In the twenty-first century, the party system has partially fragmented, with fluctuations in support for eurosceptic parties such as the United Kingdom Independence Party (UKIP) and the almost total replacement of Labour in Scotland by the SNP in 2015, making the latter a significant presence in Westminster. Governments in the second decade of the twenty-first century have been less stable than in recent history, with a coalition government in place between 2010 and 2015 and a minority Conservative government propped up by an agreement with the Northern Irish Democratic Unionist Party (DUP) between 2017 and 2019. The 2019 Conservative election victory delivered the first significant government majority in a decade. The UK's political landscape has been convulsed by the 2016 referendum on the UK's membership of the EU. A bitterly fought and divisive campaign marked by allegations of campaign irregularities and dishonesty by leading political figures delivered a narrow victory in favour of leaving the EU. This issue has defined political and social relations in the intervening years.

The UK has a hybrid media landscape, with a heavily-regulated broadcasting sector dominated by the publicly owned British Broadcasting Corporation (BBC), which is the largest domestic content provider and commands the largest audiences across television, radio, and online news. Commercial broadcasters and the BBC are regulated by the Office of Communications (Ofcom), which imposes strict rules on accuracy and impartiality in news programming. The UK's press is wholly commercial and partisan, though many newspapers profess an independence from centres of power, and journalists have traditionally adhered to a "fourth estate" role conception of independence and objectivity. Both institutional and individual independence are not always as evident in practice as they are in theory.

Cross-platform ownership of the media is restricted by legislation, though within certain sectors there has been recent market concentration. Around 80 per cent of the UK's 1000+ local newspapers are owned by five companies, and recent takeovers in the national press mean that three companies now publish two-thirds of all titles, accounting for 72 per cent of revenue and 87 per cent of print circulation. The national press and broadcasters are all headquartered in London, though the BBC has significant presence elsewhere.

The UK has a thriving hyperlocal and community media sector, with hundreds of community radio stations and online news sites. However, despite increasing professionalisation among hyperlocal news providers, the sector continues to be fragile financially. A network of digital local television stations, introduced from 2014 onwards, has failed to meet expectations and commands

negligible audiences. Combined, however, local media and the wider availability of information online has increased the availability of information to citizens at the community level at the same time as legacy local newspapers have been in sharp economic decline.

Over the last two decades, news consumption habits have altered significantly, especially amongst young people, with the population increasingly consuming news online and via mobile (62% access news via smartphone). Almost 40 per cent of the population use social media as a source of news, though this figure is highly differentiated by age. As a consequence, American technology platforms – most notably Facebook and Instagram, Google, and YouTube – have become significant gatekeepers for news.

In 2017, the *Media Pluralism Monitor* by the Centre for Media Pluralism and Media Freedom ranked the UK as high risk for three indicators (on commercial and owner influence over editorial content, editorial autonomy, and access to media for minorities), medium risk on four indicators, and low risk on the remaining thirteen.

Covid-19

In response to the Covid-19 pandemic, the UK government imposed significant restrictions on movement, travel, and public gatherings as well as the closure of non-essential businesses and industries in late March 2020. Although journalists reporting on the pandemic were classified as "key workers", and news audiences – particularly on broadcast platforms – rose sharply, the negative effect on the newspaper industry was initially profound and is expected to remain so for some time. The abrupt loss of advertising revenue – expenditure across all UK advertising was forecast to decline by 50 per cent – has resulted in publishers ceasing print distribution of some or all titles, the furloughing of a significant proportion of staff (20% at the national and regional newspaper publisher Reach PLC), and the temporary suspension of some local newspaper titles completely. On 17 April 2020, the UK government announced a three-month GBP 35 million advertising partnership with the majority of the newspaper industry to offset some of the lost advertising revenue, although none of the funding has been allocated to independent news providers.

Leading news media sample

Our media sample for the Media for Democracy Monitor (MDM) 2021 (for previous report, see Humphreys, 2011) consists of three out of four public service broadcasters (BBC, ITV, and Channel 4) and Sky News, which is not classed as a public service broadcaster but is subject to identical content regulation by

Ofcom. The heads of each news division were contacted via e-mail (news on ITV and Channel 4 is produced by a separate company, Independent Television News, which has separate divisions for the different channels that it serves), as were the editors-in-chief of nine of eleven national newspapers (excluding the *i* and the tabloid *Daily Star*). This may partly be a consequence of the severe disruption to newsrooms caused by the Covid-19 outbreak from the crucial research period of March onwards. Face-to-face interviews were not possible for the same reason.

Indicators

Dimension: Freedom / Information (F)

(F1) Geographic distribution of news media availability — 3 POINTS

In 2011 3 POINTS

News media are widely available throughout the four nations of the United Kingdom in broadcast, print, and online form. While the local newspaper industry is under pressure, there are few areas where dedicated local coverage is not available to citizens.

UK news media are widely accessible across all nations and regions. Superfast broadband provision reaches 95 per cent of UK homes and businesses, and while 4G mobile coverage is patchy in some rural areas, approximately 70 per cent of rural households receive 4G from at least one network (the figure for urban areas is between 90 and 100%). High-quality access to online news sources is therefore relatively widespread, excluding geographically remote and sparsely populated areas such as the Scottish Highlands (Ofcom, 2019a). Broadcast and print news coverage are both characterised by combined national, local, and regional coverage. On television, designated public service broadcasters (PSBs) in the UK provide a mix of national and regional news (BBC and the ITV network), national-only news coverage (Channel 4 and Channel 5), as well as minority-language news coverage in Wales and Scotland (via S4C and BBC Alba respectively) (Ofcom, 2018a). Digital terrestrial television channels (including local television channels with specific news provision obligations) and cable and satellite channels, licensed by Ofcom, are available nationwide and include a number of minority or international news channels, as well as 24-hour UK outlets such as Sky News and the BBC News Channel (Ofcom, n.d.). Radio news is provided nationally by the BBC and on commercial stations by Sky News Radio. Local commercial radio stations are obliged to provide local news content at peak times (Ofcom, 2019b).

The UK has a highly centralised national newspaper market based in London, with ten national daily newspapers and nine national Sunday newspapers (*The*

Independent and its Sunday stablemate *The Independent on Sunday* ceased print publication in 2016 and is now available online only). However, many of the national newspaper titles, including *The Sun*, *The Times* (and *The Sunday Times*), and the *Daily Mail* publish separate editions for publication in Scotland, and large regional titles in Wales, Scotland, and Northern Ireland cover those nations in their entirety or in large part. Below this tier of regional newspapers are approximately 1,000 local daily and weekly newspapers (Media Reform Coalition, 2019). While there are some isolated areas that lack local newspaper coverage, and concerns about the decline of daily local newspapers (Ramsay & Moore, 2016), the majority of the country is served by at least one local newspaper (and associated website). Hyperlocal news sites are accessible across the UK, but tend to be unevenly distributed across the country and concentrated in urban areas (Centre for Community Journalism, n.d.-a).

(F2) Patterns of news media use (consumption of news) 2 POINTS

In 2011
3 POINTS

News consumption remains high, with varied and diverging patterns of media use among different age groups. Decline in consumption of print journalism in the past decade has been significant, though the growth of online audiences offsets this to a degree.

News consumption in the UK remains high but is fragmenting as audiences for traditional sources of news (print and broadcast) decline and audiences – particularly younger audiences – seek a more varied mix of news, increasingly accessed online and via mobile. Data from the telecommunications regulator Ofcom's 2019 annual survey of news consumption demonstrates the present generational split, replicated in Table 1 (Ofcom, 2019c: 15).

Table 1 *Ofcom: Use of main platforms for use by demographic group, 2019 (age 16+, per cent)*

Platform	Total	16–24	65+
Television	75	51	94
Internet (any device)	66	83	40
Radio	43	26	49
Newspapers (print only)	38	20	58
Newspapers (print or websites or apps)	49	35	64

The top three sources of news for all UK adults in 2019 were the television channel BBC One (used by 58% of all adults over the age of 16), the commercial terrestrial television channel ITV (including its regional franchises, 40%),

and Facebook (35%). While older audiences (aged 65+) are more likely to use BBC One (78%) and ITV (52%), only one in ten reported using Facebook, with the BBC's 24-hour News Channel the third most popular source. Younger audiences again diverge from the average, with only one-third using BBC One and one-quarter using ITV. Instead, they were considerably more likely to use social media to access news, with Facebook (49%), Instagram (38%), and Twitter (33%) the three most commonly used sources of news for those aged 16–24 (Ofcom, 2019c: 21). Adults of all ages, however, use a wide variety of sources to make up their news diet, with an average of 6.7 individual news sources across all platforms being accessed. There is little deviation between age groups, with both 16–34-year-olds and 35–54-year-olds reporting using an average of 7 news sources, and those aged 55 and older using 6.2 sources on average (Ofcom, 2019c: 66).

Within traditional platforms, the age divide is pronounced. Figures from the Broadcast Audience Research Board shows that flagship evening television news bulletins still reach audiences comparable to those reached ten years ago: the BBC's *News at Six* has an approximate average audience of five million viewers (compared with approximately 4.9 million in 2010) while ITV's early evening news bulletin reaches 3.6 million people on average, slightly down from 3.9 million a decade ago. The main news bulletins of Channel 4 and Channel 5 reach 0.75 million and 0.3 million respectively (Mediatel, 2020a). Demographic breakdowns of audience profiles for the respective timeslots show that younger viewers only account for a tiny percentage of the audience (3% of BBC One's 17:30–20:00 audience; 3% of ITV audience; and 6% and 3% of Channel 4 and Channel 5 audiences, respectively). Radio news continues to reach significant audiences, with 72 per cent of UK adults using BBC Radio and 59 per cent using commercial radio for news; younger audiences obtained news from BBC Radio 1 (53% of adults 16–24) and commercial stations Heart (28%) and Capital (38%) (Ofcom, 2019c: 32).

National print newspaper circulation has declined by over half since 2010 (Ofcom, 2019c: 34), though total brand reach (print and online) figures show that some news brands now reach larger audiences within the UK than they have for some time (Media Reform Coalition, 2019: 7). Publishers Audience Measurement Company data on the proportion of print audiences from younger demographic groups (aged 15–24) shows that the quality (broadsheet) national press only receives between 2 per cent (*Daily Telegraph*) and 6 per cent (*The Guardian*) of their readership from this age group, though this is on average higher than the popular press (1.5% for the *Daily Mail* and 3.0% for *The Sun*), if lower in terms of absolute numbers (Mediatel, 2020a). Younger audiences are, however, more likely to access certain legacy print news brands than older audiences when print and digital audiences are combined (Ofcom, 2019c: 39). Lower brand loyalties among younger audiences are confirmed by their increased

tendency to access online news via social media posts (56% of 16–24-year-olds versus 41% of all adults) than directly from news organisations' websites or apps (22% versus 30%).

The habits of news consumers in the UK have been affected by the country's prolonged exit from the EU (Brexit) and associated political upheavals. The 2019 *Reuters Digital News Report* noted that 35 per cent of Britons sometimes or often deliberately avoid domestic news, with Brexit being the primary reason; this has played into declining news audiences for certain – particularly legacy print and broadcast – news outlets (Reuters Institute, 2019: 68).

(F3) Diversity of news sources

2 POINTS

IN 2011
2 POINTS

News agencies are widely used by UK journalists, and there has been consistent evidence of the infiltration of public relations material into journalism, but journalists and editors have a high degree of autonomy in the pursuit of stories and sources.

There is no centralised national news agency in the UK. The Press Association (renamed PA Media in 2019) is over 150 years old and is owned mostly by a consortium of national and regional newspaper publishers. Other national and international news agencies are also frequently used, including Reuters, Associated Press, Agence France-Presse, and Australian Associate Press. Some news outlets make extensive use of agency copy in their online output, particularly *MailOnline*.

Journalists tend to have a significant degree of freedom to pursue sources and stories (though newsroom roles differ and local newspaper journalists are more likely to be reliant on external sources of information due to pressures on time and resources, with agency copy and public relations (PR) material; see, e.g., Indicator C4 – Journalism professionalism). Face-to-face and telephone interviewing is still regarded as the main method of interacting with sources and obtaining information (Spilsbury, 2018: 34). Investigative journalism and the use of foreign reporting continue to be central to UK news organisations, though economic pressures have reduced the capacity of newspapers to engage in both (e.g., Indicator C9 – Watchdog function and financial resources).

The problem of "churnalism" – the recycling of PR material as news – has been well documented in the UK print media and has been detected in both national and local news content (see Indicator F5 – Company rules against *internal* influence on newsroom/editorial staff). Syndication of content (that has not been produced by a news agency) is rare, although anecdotal evidence is beginning to emerge of replicated stories within the local newspaper portfolios of some regional publishers responsible for large numbers of titles. The recent Local Democracy Reporter Scheme – a partnership between the BBC

and local newspapers – results in a central repository of stories to be accessed by members of the scheme, though this is produced by a network of reporters embedded in local newspapers, rather than a centralised agency or syndication network (Tobitt, 2019).

Studies of news media content at the time of elections has often found that institutional and elite political sources dominate news coverage (Moore & Ramsay, 2015), though broadcasters routinely use members of the public as proxy sources for public opinion in political stories (Cushion, 2018). News media typically do not omit sources on political grounds; the practice is prohibited to a degree on television due to impartiality rules (though the qualifier of "due" impartiality means that all views need not be included in news reporting; for more details on internal pluralism in newsrooms, see Indicator E10 – Rules and practices on internal pluralism).

(F4) Internal rules for practice of newsroom democracy 1 POINT

In 2011
1 POINT

Newsrooms in the UK continue, on average, to be hierarchical, with editorial coordination concentrated among senior roles at the expense of ordinary journalists. The appointments of editors-in-chief rarely involve journalists.

UK newsrooms, particularly at newspapers, have traditionally been hierarchical, with editorial control largely in the hands of departmental editors and editors-in-chief, with some instances of direct proprietorial interference in editorial positions. Representatives of the British press are also notably reticent to discuss newsroom decision-making, and ethnographic studies of UK newsrooms in recent years are rare. Reviews of governance and editorial policies in major UK newspapers by the Leveson Inquiry (2011–2012) found newsrooms to be generally hierarchical, with ultimate responsibility for editorial decisions in the hands of top editorial roles (Leveson Inquiry, 2012a: 99–156).

More recently, a Reuters Institute survey of UK journalists across all sectors found that over half of respondents reported "always" or "very often" participating in editorial and newsroom coordination (such as attending editorial meetings or assigning reporters). However, the level of participation varied significantly depending on the role and seniority of journalists: while 71 per cent of senior managers and 65 per cent of junior managers "always" or "very often" participated, only 27 per cent of rank-and-file journalists and 16 per cent of freelance journalists felt the same. In contrast, 65 per cent of freelance journalists and 47 per cent of rank-and-file journalists reported that they "almost never" or "rarely" participated in editorial coordination (Thurman et al., 2016: 28). This indicates that control over newsrooms continues to be concentrated more in editorial staff than in ordinary journalists.

The Guardian operates a staff ballot for the appointment of editors, with a vote in 2015 installing Katharine Viner as the editor-in-chief (The Guardian, 2015). This is, however, an unusual case, and editors are traditionally appointed by proprietors, as with the recent appointment of a new editor at the *Daily Mail* (Waterson, 2018).

There has been a significant increase in the number of women appointed to senior editorial and management positions in UK news organisations. In addition to Katharine Viner's appointment at *The Guardian* in 2015, women now edit several UK national newspapers: *The Sunday Times* and *The Sun* appointed women editors in 2020; Roula Khalaf became editor of *The Financial Times* in 2019; and Alison Phillips began editing the *Daily Mirror* in 2018. In broadcasting, Fran Unsworth became Director of News and Current Affairs at the BBC in 2018, and Louisa Compton was appointed Head of News and Current Affairs and Sport at Channel 4 in March 2020 (succeeding Dorothy Byrne). The BBC has internal targets for women in leadership roles (the 2020 target is 50%; as of March 2019, the figure was 43.8%) (BBC, 2019a: 81). Sky, owner of Sky News, operates a Women in Leadership programme, encompassing sponsorship and training, with an aim of 50 per cent of leadership roles to be filled with women and a current balance of 39 per cent. Specific figures for Sky News are not included (Sky, n.d.).

(F5) Company rules against *internal* influence on newsroom/editorial staff

2 POINTS
IN 2011
2 POINTS

Newsrooms and management are generally separate, though changing business practices in UK newspapers is leading to a more porous boundary between the editorial and commercial arms of media companies.

Internal interference, in the sense of the leveraging of managerial power to pursue political or commercial ends, is generally not an issue in broadcast newsrooms in the UK. The BBC's public ownership means that these incentives do not exist within the organisation, and the remaining public service broadcasters have news produced by a separate company, Independent Television News (ITN). There have been no allegations of, or Ofcom investigations into, issues of internal influence within the remaining domestic news provider, Sky News.

During the 2011–2012 Leveson Inquiry, newspaper editors, managers, and proprietors were questioned extensively on the interplay of different interests in the news-making process. While Rupert Murdoch – owner of the publishers of *The Times*, *The Sunday Times*, and *The Sun* – did admit to an active interest in the editorial direction of *The Sun* (Leveson Inquiry, 2012a: 108), other editors and managers testified to the Leveson Inquiry that their organisations

fully respected the insulation of editorial processes from commercial or political influence. The Guardian Media Group, for example, cited the constitutional separation of editorial and commercial arms of their organisation (Singer, 2011). The editor of *The Times* stated, "There have never been any commercial pressures placed upon me that would undermine in any way the ethical, professional or legal conduct of journalists" (Harding, 2011). Responses of this kind from senior staff may be expected; unfortunately, the voices of ordinary journalists below the rank of editor were not heard at the inquiry.

Research conducted on business practices at commercial news organisations across a range of countries including the UK has found that the traditional norm of separation between the editorial and commercial arms is in decline, resulting in,

> [a] new norm […] based on combining established editorial values with values such as collaboration, adaptation, and business thinking, and it is already playing an important role in legitimising new practices that are based on frequent exchanges between editorial and the commercial teams. (Cornia et al., 2020: 173)

This ties in with interviews with representatives of local newspapers in the UK which found that some titles were strategically developing in-house relationships between editorial and advertising departments to cope with economic pressures (Jenkins & Nielsen, 2020).

Movements such as this have accompanied some high-profile scandals involving UK media, in particular the public resignation of veteran reporter Peter Oborne from *The Telegraph* in 2015. He resigned amid allegations that the newspaper management had consistently intervened in journalists' reporting on alleged wrongdoing at a major advertising partner of the newspaper, the international bank HSBC, with senior editors refusing to publish certain critical stories about the bank (Oborne, 2015). The journalist's account was backed up by an analysis of *The Telegraph's* reporting on the HSBC scandal (G. Ramsay, 2015). Oborne claimed that this was one of several episodes where the newspaper had published unusually favourable coverage of advertising partners.

Less dramatic, but also indicative of a merging of editorial and commercial imperatives in the newsroom, is the growth of sponsored content in the digital editions of UK newspapers. Research has shown that online newspapers in the UK, along with their counterparts in the US, were more likely to include sponsored content in their output (Conill, 2016: 912). In a similar vein, the problem of "churnalism" – the substitution of original written news output for PR copy – has been a significant problem in British print journalism for over a decade (Lewis et al., 2008).

(F6) Company rules against *external* influence on newsroom/editorial staff

2 POINTS

In 2011
2 POINTS

Broadcast news in the UK is largely insulated from commercial pressures, although political interference in public service broadcasters has grown in the past decade. Commercial news outlets have a wide range of advertising partners, though there is some evidence of editorial favourability to certain industries.

The UK has a mixed media landscape, with news organisations being funded by a mix of public money (the BBC) and traditional advertising, as well as subscription and membership models. Commercial newspapers deal with a wide range of advertisers across many industry sectors, though there is some evidence that coordinated lobbying from certain industries can have an effect on editorial positions. Broadcast news is largely insulated from commercial influence due to the contracting out of news production by most commercial television and radio broadcasters, and the BBC is intended to be insulated from direct political pressure due to its incorporation by Royal Charter. However, consistent government pressure has been exerted on the BBC over the past decade.

As the incident involving *The Telegraph* and reporting on major advertising partners (described in Indicator F5 – Company rules against *internal* influence on newsroom/editorial staff above) shows, internal and external influence on newsrooms can be combined under certain circumstances. While individual news organisations may have significant and lasting partnerships with advertisers, there is little evidence that commercial media depend on a small number of large advertisers. Conversely, the media data and analytics platform Mediatel compiles Neilsen data for advertising spend by platform, and found that the UK television, radio, national, and regional press each attract hundreds of advertisers grouped across 13 sectors (Mediatel compiles the top 25 advertisers in each sector for each platform). For example, in December 2019, the most lucrative advertising sector for the UK national press was "Entertainment and Leisure"; the top 25 companies bought advertising space totalling GBP 5.4 million. The largest single advertiser in this group accounted for just 14 per cent of the total (Mediatel, 2020b).

Investigative reporting has uncovered some instances, however, of business lobbying infiltrating news content either through traditional paid advertising – often in the form of native advertising – the juxtaposition of industry advertising alongside relevant editorial content or the use of intermediary organisations such as affiliated think-tanks to influence reporting on specific industries. Research has found evidence that fossil fuel and energy companies have been able to penetrate newspaper coverage of climate change using these techniques (A. Ramsay, 2015; Energy & Climate Intelligence Unit, 2015).

News in the commercial broadcasting sector is insulated against direct influence by advertisers, since broadcasters are obliged to outsource the production of news to a separate company. ITN produces news for ITV and Channel 3, Channel 4, and Channel 5, while Sky News Radio provides bulletins for the majority of commercial radio stations. In any case, Ofcom's Broadcasting Code has detailed guidelines and restrictions on the inclusion of commercial content in programming (Ofcom, 2019d).

The BBC's incorporation by Royal Charter is designed to protect the broadcaster from parliamentary interference. In practice, however, moments of charter renewal (typically every ten years) often involve a degree of political pressure being exerted on the corporation in the form of reductions in funding or changes to the BBC's remit. This is not new, but the past decade has seen an increase in governments – led by a Conservative Party that has traditionally been comparatively hostile to the BBC – imposing constraints: in 2010 the government imposed a licence fee freeze for six years plus additional funding obligations (BBC, 2010). In 2015 – prior to a new round of Royal Charter renewal negotiations – the Conservative government announced that the BBC would have to bear the cost of providing free television licences for over–75s, a subsidy historically provided by the state (BBC, 2015) – though implementation of this has, to date, proved politically difficult. In 2020, a new Conservative government launched a public consultation on decriminalising non-payment of the licence fee, potentially endangering BBC revenues further (BBC, 2020). The government's continued interventions around licence fee renewal are seen as compromising the independence of the BBC (Moore, 2016), and the imposition of budgetary constraints on the BBC indirectly impacts the resources available to the corporation's news departments.

Pressure on broadcast news beyond the BBC has also increased to an extent. The public service broadcaster Channel 4 is also underpinned by legislation and run by the statutory corporation which is part of the UK government Department for Digital, Culture, Media and Sport (DCMS). During the December 2019 general election campaign, representatives of the Conservative Party (which would subsequently form the next government) accused the channel of partisan bias due to its coverage of election debates and suggested that the broadcasting remit of Channel 4 could be reviewed after the election (Waterson, 2019). This was generally interpreted as an implicit threat to the channel on the basis of its news and current affairs coverage. Ofcom subsequently ruled that the offending programme was not in breach of the Broadcasting Code; no further action has been taken (Ofcom, 2019e).

(F7) Procedures on news selection and news processing 3 POINTS

In 2011
2 POINTS

Broadcast news in the UK is governed by a series of regular procedures on news selection and processing. Newspapers also supply detailed guidelines to journalists on newsgathering and verification.

The Leveson Inquiry in 2011–2012 investigated the governance structures in newspapers and their newsrooms, and in a series of hearings, editors were questioned on the editorial processes they oversaw. Some exchanges revealed relatively detailed processes of internal discussion and decision-making on story publication (Leveson Inquiry, 2012a: 99–155). Most UK national newspapers (and the larger publishers of regional newspapers) release details of detailed guidelines supplied to journalists for the provenance of stories before publication and of newsroom training (IPSO, 2019a). Others publish their editorial guidelines for journalists, detailing the newsgathering process (Financial Times, 2020). Academic quantitative content analysis research has demonstrated the news values that inform how UK newspapers build their news agendas (Harcup & O'Neill, 2016).

The UK's broadcasters are guided by a series of rules and regulations on the approaches taken when conducting journalism and covering stories of political significance, via the Ofcom Broadcasting Code. The BBC is also obliged by the terms of its Royal Charter to produce a set of editorial guidelines, alongside which is also published a detailed list of guidance notes for all employees. A 2007 BBC document provides a detailed account of the procedures by which stories on the BBC made it onto air (Boaden, 2007). Studies of the BBC's editorial processes have shown how the corporation employs detailed professional assessments in story selection, but in doing so can fail to achieve some of its journalistic functions (Wahl-Jorgensen et al., 2017). Additional research has shown that UK broadcasters as a whole are influenced by external factors when constructing news agendas around political stories, notably the published content of national newspapers (Cushion et al., 2016).

(F8) Rules and practices on internal gender equality 2 POINTS

Despite recent improvements in the representation of women in the very top editing and managerial roles, women continue to be underrepresented in managerial roles, and a substantial gender pay gap remains.

Women journalists in the UK are still faced with a significant gender pay gap and have been less likely to progress to senior management roles. However, news organisations have begun implementing policies and goals designed to

reduce pay inequality and promote parity in employment levels. Though there is still some way to go, there has been progress in this area in recent years.

Several studies have identified that women make up 45 per cent of UK journalists (Thurman et. al., 2016; Spilsbury, 2018). However, while there has been a significant increase in the numbers of women in the very top editorial and managerial positions in newspaper and broadcast journalism (see Indicator F4 – Internal rules for practice of newsroom democracy), women are slightly more likely to be in more precarious part-time or freelance roles than men, and significantly less likely to progress to senior management roles during their careers. Whereas 37 per cent of men in journalism are in senior roles after 21–29 years of professional experience, only 18 per cent of women reach that level; instead, they are much more likely to be in junior managerial roles (55%) than men (41%) (Thurman et al., 2016: 10).

The BBC operates a series of policies intended to achieve greater equality and diversity across the Corporation. A report on career progression and culture for gender equality was commissioned and published in 2018, including the following main recommendations:

- embedding flexible working, mentoring, and sponsorship for women looking to apply for senior leadership roles, support for women returning to work after time off with children and the introduction of shared paternity leave;
- the removal of existing barriers to women joining the organisation and to provide opportunities for existing female employees, and revised recruitment processes to reduce gender bias;
- and greater training and accountability for team managers and revised processes to resolve challenges and problems in the workplace (BBC, 2018a: 5).

The Guardian committed, in a 2017–2018 working report, to reduce the organisation's gender pay gap, to achieve a 50:50 gender balance in the top half of the organisation, and to develop, promote, and recruit more women across the organisation as a whole (The Guardian, 2018).

The Telegraph, whose owner has the worst gender pay gap of the media organisations shown below, produced a roadmap in 2017 for achieving a zero gender pay gap by 2025, through introducing a series of policies to benefit women employees, including flexible working, maternity benefits, and support, and the use of 50:50 gender shortlists in recruitment (Telegraph Media Group, 2017: 5).

The UK's Equality Act 2010 was amended in 2017, making it compulsory for companies in Great Britain (excluding Northern Ireland) with more than

250 employees to publish information about gender pay gaps within their organisations. Table 2 shows the gender pay gaps for selected companies with print or broadcast news publishing activities (excluding the BBC and those commercial news organisations with complex and diffuse corporate structures, such as Reach PLC). The results show a significant continuing disparity between median hourly wages for women and men, with women receiving 22.7 per cent less than men at Telegraph Media Group. None of the selected companies have pay parity for women and men, though Guardian News and Media and Sky UK perform slightly better. The problem appears to be structural, as women are less likely to feature in the upper quartile of earners in these companies, ranging from 41.4 per cent at Independent Television News to just 17.5 per cent at News Group Newspapers, publisher of the tabloid newspaper *The Sun*. The BBC is obliged to publish gender pay gap information in its annual accounts, and its results are marginally better, with a deficit of 6.7 per cent in its gender pay gap in 2018 and 2019, lower than the other companies listed here and a reduction but still a significant difference (BBC, 2019a: 14).

Table 2 *Gender pay gap information, selected UK news publishers, 2018–2019 (per cent)*

Publisher	Median hourly wage difference (+/–)	Proportion of women, top pay quarter	Proportion of women, lower pay quarter
Telegraph Media Group (print)	-22.7	33.5	61.3
Financial Times (print)	-18.4	32.0	61.0
News Group Newspapers (print)	-18.0	17.5	52.3
Associated Newspapers (print)	-16.1	29.7	49.5
Express Newspapers (print)	-14.6	26.0	57.0
Independent Television News (broadcast)	-12.6	41.4	64.0
Guardian News and Media (print)	-8.4	35.0	61.0
Sky UK (Sky News) (broadcast)	-7.8	32.0	40.0

Source: Gov.uk, n.d.-b

For journalists themselves (rather than all employees at media organisations) the *Journalists at Work* survey noted an 18 per cent difference in average median salaries for men and women in 2018, with the median salary for men being GBP 27,500 and for women being GBP 22,500 (Spilsbury, 2018: 76).

(F9) Gender equality in media content 2 POINTS

There is an imbalance in the frequency of female voices as expert sources in UK news coverage, and in the portrayal of women in certain outlets, though several news organisations, particularly broadcasters, have engaged in policy reviews and have introduced new policies and procedures to address the problem.

While UK broadcasters responded to a 2015 House of Lords committee report about women in news and current affairs broadcasting (on-screen and off-screen) with a range of policy statements and reviews on diversity and inclusiveness within their operations, problems persist in the representation of women in many, but not all, UK national newspapers. Significant imbalances persist in the use of women as expert sources across the media landscape as a whole. While guidelines, policies, and monitoring of gender equality and diversity in content are applied by the UK's public service broadcasters, there is little evidence that this is practised by newspapers.

The 2015 report, by the House of Lords Select Committee on Communications, noted a significant imbalance of women experts in broadcast news coverage and urged broadcasters to take steps to ensure that they better reflected society by ensuring a gender balance (House of Lords, 2015: 5). A number of reviews and policy changes have been put in place by broadcasters in the interim. The BBC's Royal Charter (renewed in 2017) specifies one of the Corporation's public purposes as "to reflect, represent and serve the diverse communities of all of the United Kingdom's nations and regions" (DCMS, 2016a: 6). The Corporation has since developed a diversity commissioning code of practice to achieve this (BBC, 2019b) and run a series of "Expert Women" events as part of a campaign to increase the number of expert women presenters and contributors, particularly for topics in which women have been especially underrepresented. The campaign is run with support from other UK broadcasters, including Sky, which does not have defined public service broadcasting obligations set by Ofcom (BBC, 2017).

Other broadcasters have engaged in parallel reviews of on- and off-screen diversity and inclusion, such as ITV's *Social Purpose Impact Report* (ITV, 2019a) and Channel 4's *Fourteen Insights into Inclusion & Diversity* (Channel 4, 2019). Together, the BBC, ITV, Channel 4, Channel 5, and Sky use the online system Diamond to monitor consistent diversity data on programmes that they commission. Diamond reports contain breakdowns by broadcaster for the proportion of on-screen contributions for different groups: for example, 55.8 per cent of on-screen contributions in BBC programming were by women. This compares with 54.7 per cent for ITV, 49.5 per cent for Channel 4, 45.6 per cent for Sky, and 44.7 per cent for Channel 5 (Diamond, 2020: 13).

A 2018 study commissioned by the Global Institute for Women's Leadership at King's College London found that just 23 per cent of expert sources across

UK news outlets were women, with women especially unlikely to be cited as expert sources in stories about business and finance (14% of expert sources), foreign politics (13%), and considerably more likely to feature in stories about social policy (48%) (Centre for the Study of Media, Communication and Power, 2018: 2).

Research produced in 2017 by Women in Journalism – a network for women working in UK print, broadcast, and online media – found that print media were lagging behind broadcasters in redressing gender imbalances in content production and coverage. It also found that portrayals of women on the front pages of UK tabloid newspapers tended towards sexualised coverage and photographs, with women in newspapers "more likely to appear as victims or arm candy" (Mills et al., 2017: 13). Research on representations of women politicians in UK newspapers similarly found that stories tended to focus on aspects of their personal lives, appearance, and gender, rather than on their policies or expertise (Williams, 2018).

(F10) Misinformation and digital platforms (alias social media) 2 POINTS

Journalists demonstrate a high regard for the need for social media verification in their work. While print media do not publicise guidelines for social media verification, broadcast newsrooms tend to have detailed procedures in place, particularly for international coverage.

The BBC's Editorial Guidelines contain a series of guidance notes outlining the Corporation's policies on online newsgathering, social media, and Internet research (BBC, n.d.-a). An ethnographic study of BBC newsrooms' processing of user-generated content (UGC) in coverage of international conflict noted the evolution of policies and working practices within and between groups to minimise problems of verification (Johnston, 2016). Though other broadcast news providers are governed by Ofcom's Broadcasting Code sections on due accuracy, they do not publish their social media verification policies in their editorial guidelines. The newspaper industry's regulator IPSO (Independent Press Standards Organisation) requires all members to supply annual statements with information including internal policy on the verification of stories. Of the most recent set of annual statements, none of the national newspaper publisher members of IPSO provided evidence of dedicated policies or processes to protect journalism from digital misinformation (IPSO, 2019a).

Journalists as individuals have a high regard for the need for social media verification. A 2018 survey of journalists' working practices suggests that journalists are wary of information obtained from social media when developing

stories, but that they have high confidence in their skills to verify information from social media sources (Spilsbury, 2018: 36) Table 3 shows the ways in which journalists check social media content.

Table 3 *Verification of information on social media (per cent)*

Method of verification	Proportion using
Contacts	80
Seeking multiple sources	78
More discussion with the original source	75
Emergency services (police, ambulance service, etc.)	69
Attending the scene in person	55
Use of online tools	45
Other	4

Source: Spilsbury, 2018: 36

The NCTJ (National Council for the Training of Journalists) offers training courses in social media reporting and verification, but, as with the information in Table 3, this denotes the individual skills and responsibilities of individual journalists, rather than sophisticated organisational policies to mitigate against the infiltration of misinformation or disinformation into news coverage.

Empirical research suggests there are some systemic problems in how certain UK news organisations protect themselves from mis- and disinformation. A 2019 study found evidence of disinformation and strategic narratives spread by Russian state-linked media were being picked up and republished by certain tabloid newspapers, indicating a lack of sophistication in detecting targeted messaging disguised as news by motivated political actors (Ramsay & Robertshaw, 2019).

(F11) Protection of journalists against (online) harassment 2 POINTS

UK journalists with formal contracts enjoy a range of support mechanisms relating to abuse and harassment online. Legal protections also apply in some cases. Freelance journalists, however, report little or no access to support networks.

A 2019 review of UK newsroom practices for protecting journalists from online abuse and harassment, covering broadcast, print organisations, and news agencies, found a range of established and developing policies. These included the implementation of detailed guidelines for journalists and editors in the event of harassment and procedures for the reporting of incidents to management. Some newsrooms employ voluntary trauma risk and mental health training,

peer monitoring of abusive communications, and regular meetings between social media editors and news teams to monitor the effects of potential abuse. Newsrooms were also found to implement guidelines for social media use by employees, including preventative measures and privacy protection, blocking policies, and threat reporting mechanisms. Some news organisations also utilised social media teams who liaise with platforms in cases of sustained online harassment campaigns (Trionfi & Luque, 2019: 55–58). Freelance journalists, however, reported that they had little or no access to these support networks (Trionfi & Luque, 2019: 54).

Journalists in England and Wales also have access to protections in law (different legal jurisdictions operate in Scotland and Northern Ireland, though similar legislation is in place there). The Malicious Communications Act 1988 specifies that it is an offense to send communication that is "indecent or grossly offensive, threatening or false, if the purpose of the communication is to cause distress or anxiety". The Communications Act 2003 (Section 127) outlines the criminal offense of sending messages through a public communications network that is grossly offensive or of an indecent, obscene, or menacing character, or to send false information for the purpose of causing annoyance, inconvenience, or needless anxiety to another. The Protection from Harassment Act 1997 prohibits actions amounting to harassment. There is some lack of clarity in these pieces of legislation and their application to journalism, such as the definition of "grossly offensive" messages in the Malicious Communications Act 1988 and the inclusion of coordinated online "pile-on" behaviour under the definition of harassment (Feikert-Ahalt, 2019: 47–50). Other legislation, such as the Public Order Act 1986 and the Criminal Justice and Courts Act 2015, are relevant to protections from malicious communication.

Dimension: Equality / Interest Mediation (E)

(E1) Media ownership concentration national level — 2 POINTS

In 2011
2 POINTS

Ownership concentration in the newspaper industry has increased in recent years, and commercial radio is dominated by a small number of companies. The BBC, while publicly owned, is dominant in broadcasting overall, and broadcast news provision is almost entirely provided by the BBC, ITN, and Sky News.

National news media markets in the UK vary significantly in terms of their levels of concentration. The national press, based in London, is wholly commercial and highly concentrated. Broadcast markets have varying degrees of consolidation, but in the specific area of broadcast news, the public broadcaster – the British Broadcasting Corporation – dominates, with one major commercial competitor,

Independent Television News, providing national news for commercial radio and all terrestrial public service broadcasters. Domestic television news is also supplied on free-to-air digital terrestrial television as well as subscription cable and satellite channels on 24-hour news channel *Sky News*. Online news is naturally more fragmented, but legacy print and broadcast news brands make up the majority of most popular news sources, with the BBC in particular enjoying a dominant position among UK online news consumers. UK legislation limits media mergers under certain circumstances and prevents cross-ownership of broadcast licences by newspaper owners, but also to ensure that Channel 3 (ITV) licensees use a single news provider (Ofcom, 2018b).

In terms of national press, the UK has eleven mainstream national daily newspapers (including *The Independent*, which ceased publishing in print in 2016 and the *i*, originally a condensed version of *The Independent*, most recently purchased by DMG Media in November 2019), nine Sunday newspapers, and a weekend edition of *The Financial Times* (see Table 4). Consolidation in recent years has been driven by the exit of JPI Media, a major publisher of local and regional newspapers, from the market with the sale of the *i* to DMG Media in 2019 and the purchase of Express Newspapers (publisher of the *Daily Express* and *Daily Star* and their Sunday equivalents) by Trinity Mirror in March 2018 (Trinity Mirror rebranded as Reach PLC two months later).

The most recent revenue figures available for all owners of national newspapers are from 2018. Table 4 shows the state of the national newspaper landscape in 2020, with company revenue figures from each of the parent companies in 2018. The 2018 figures show that three companies – News Corp UK and Ireland, Reach PLC, and DMG Media Ltd – account for 72 per cent of all revenue for national newspaper publishers. The companies also publish two-thirds of all national newspapers and represent 87 per cent of all weekly print circulation (Media Reform Coalition, 2019: 5).

Terrestrial (DTT – or digital terrestrial television – and cable or satellite) television in the UK is supplied by a range of companies with substantially different corporate structures and ownership models. Within this ecosystem, however, television news at the national level is almost entirely produced by three organisations – the BBC, ITN, and Sky News.

Table 4 *UK national newspaper market, 2020*

Company	Legacy national titles	Turnover, 2018 (GBP)	Cumulative share (%)
News Corp UK & Ireland Ltd	The Sun The Sun on Sunday The Times The Sunday Times	727,793,000	24.9
Reach PLC (formerly MGN Ltd)	Daily Mirror Sunday Mirror The Sunday People Daily Express Sunday Express Daily Star Daily Star Sunday	723,900,000	49.7
DMG Media Ltd	Daily Mail The Mail on Sunday i (from Nov 2019)	651,851,000	72.0
The Financial Times Ltd	The Financial Times FT Weekend	323,599,000	83.1
Telegraph Media Group Ltd	Daily Telegraph Sunday Telegraph	271,400,000	92.4
Guardian News & Media Ltd	The Guardian Observer	199,250,000	99.2
Independent Digital News and Media Ltd	The Independent (Digital since 2016)	24,803,000	100.0
Total	–	2,922,596,000	–

The six companies that produce UK terrestrial television have very different structures. The BBC, the nation's public broadcaster, is funded by a compulsory licence fee, which raises approximately GBP 3.6 billion each year, supplemented by additional income to a total of GBP 4.9 billion (2018 figures). The corporation spent around GBP 1.7 billion on all television services in 2018 (BBC, 2019a: 58). ITV, the traditional terrestrial commercial rival to the BBC, achieved external revenues of GBP 3.3 billion in 2019 (ITV, 2019b: 52), while Channel 4 – publicly owned but commercially funded – saw revenues of GBP 975 million (Channel Four Television Corporation, 2019: 156). The remaining terrestrial commercial broadcaster with public service broadcasting obligations, Channel 5,

is ultimately owned by US-based Viacom International (2018 revenues of USD 12.9 billion – approximately GBP 9.8 billion in 2018) (Viacom International, 2019: 34), yet Channel 5 Broadcasting Limited had revenue of only GBP 376 million (Channel 5 Broadcasting Limited, 2019: 10). The satellite broadcaster Sky Group had 2018 revenues of GBP 13.6 billion (Sky Group, 2019: 10) but since October 2018 has been ultimately owned by American group Comcast (2018 revenue: USD 94.5 billion respectively GBP 71.4 billion) (Comcast Corporation, 2019: 74). Finally, BT (British Telecommunications), traditionally a telecommunications infrastructure company, moved into subscription sports coverage in 2013. The parent company's 2018 revenue was GBP 23.7 billion (BT Group, 2019: 4). The overall concentration of the television news market is therefore complicated by the fact that for some companies (for example, BT) television content production is a minor aspect of a much larger corporate portfolio, while the American companies Viacom and Comcast dwarf the UK-based television market in which they have a stake. Table 5 accordingly shows the domestic revenue of those UK-based television broadcasters who provide news; BT is excluded since its broadcast output consists solely of sports, though it should be noted that BT's total group revenue is approximately equal to all other television broadcasters combined.

Table 5 *UK television news broadcasters' revenue, 2018 (GBP million)*

Broadcaster	Revenue
Sky Plc	13,585
BBC	4,889
ITV Plc	3,885
Channel Four Television Corporation	975
Channel 5 Broadcasting Ltd	376

The television news market is more consolidated. The BBC is responsible for all news published across its broadcast and online platforms, while the commercial public service broadcasters – ITV, Channel 4, and Channel 5 – receive news from a single supplier: Independent Television News. ITV consists of a series of regional licences with a degree of shared national programming and is obliged by law to use a single news provider for all licenses. ITN has supplied ITV with news since 1955. Channel 4 has used ITN since it launched in 1982, and though Channel 5's news bulletins were produced by Sky News between 2005 and 2012, it too has reverted to ITN. Sky provides its own 24-hour news channel Sky News, available on its own subscription platform as well as free to the public via DTT.

The BBC does not disaggregate its news spending across different platforms in its annual statements, but in 2018 the Corporation allocated GBP 355 million to news and current affairs (BBC, 2019a: 61), of which GBP 53 million was spent on the 24-hour BBC News Channel (BBC, 2019a: 58). ITN's total revenue was GBP 127 million, of which GBP 89 million was derived from its news operations (ITN, 2019: 53). Sky, unfortunately, also does not disaggregate the proportion of its business that is devoted to Sky News (also a problem when estimating the UK's radio news markets, given Sky News' prominent position in radio news provision), meaning that it is not possible to gain a clear picture of the proportion of the domestic UK television news market that is controlled by each company. However, the fact that three companies supply television news in the UK is an indicator of a consolidated market.

National radio in the UK is provided via both analogue and digital broadcasting. Regardless of the method of transmission, public broadcasting is handled solely by the BBC, and commercial national radio is dominated by three companies: Global Radio, Bauer Media, and Wireless Group. Analogue national radio broadcasting consists of five BBC stations covering music, live sport entertainment, and news, plus Classic FM (music; Global Radio); Absolute Radio (music; Bauer Media), and TalkSport (sport; Wireless Group). The BBC operates five stations that broadcast nationally in both analogue and digital (Radio 1; Radio 2; Radio 3; Radio 4, and Radio 5 Live) as well as a further six stations that are digital-only (including the World Service). There are 40 national digital commercial stations available via two multiplexes (Digital One and Sound Digital). Of these 40 stations, almost three-quarters are owned by Global Radio (14 stations), Bauer Media (nine stations), and Wireless Group (six stations) (Arqiva, n.d.).

BBC expenditure on its national radio stations (analogue and digital, excluding BBC World Service) in 2018 was GBP 304 million (BBC, 2019a: 59), roughly equal to Ofcom's estimate of GBP 302 million for national commercial radio revenue in the same year. Ofcom also records a figure of GBP 107 million for commercial radio sponsorship – as distinct from advertising revenue – but does not disaggregate this data for local or commercial markets (Ofcom, 2019f: slide 10). It is difficult to determine precise levels of concentration in the national commercial radio market: Wireless Group was purchased in 2016 by News Corp, and the parent company's accounts do not supply a specific revenue figure for the subsidiary. The other large commercial companies, Global Radio and Bauer Media, are also dominant in local radio, so it is difficult to ascertain which portions of their revenue are derived from national broadcasting, and which from local broadcasting. In addition, four smaller publishers (Folder Media, Sunrise Radio, A Spokesman Said Ltd, and Jack FM) fall below the "small company" legal definition in UK company law and therefore are not obliged to publish revenue figures. It can, however, be stated

with some confidence that the overall radio market is concentrated: the BBC accounts for around half the market, and three companies – Global, Bauer, and Wireless – dominate the commercial sector.

In terms of radio news provision, the UK is a duopoly: the BBC provides news and current affairs programming across all of its radio outlets, while all news programming on commercial radio is produced by Sky News Radio and supplied to stations by Independent Radio News. Since neither the BBC nor Sky disaggregate their news funding figures by platform, it is not possible to determine a definite figure for the national radio news market.

In addition to legacy print and broadcast, the UK has a range of digital-first news brands, some of which have national scope, such as *HuffPost UK* and *LadBible*, an entertainment site that has steadily increased its journalism output (*Buzzfeed* operated a respectable UK journalism operation that was abandoned unexpectedly in May 2020). These sites attract significant audiences:11 per cent of UK news consumers report having used *HuffPost* for news in the previous week, with 8 per cent for *Buzzfeed* prior to its cutbacks and 6 per cent for *LadBible* (Reuters Institute, 2019: 69). The emergence of highly partisan right- and left-wing news sites in recent years has added an element of pluralism to the UK's online news market, though sites such as *Breitbart* (which has a dedicated *Breitbart London* subsite) and left-wing sites such as *Novara Media* or *The Canary* attract very small audiences, with none reaching over 2 per cent of UK news consumers (Reuters Institute, 2019: 69).

(E2) Media ownership concentration regional (local) level 2 POINTS

In 2011 1 POINT

The UK local press has become more concentrated over the past 20 years, but a significant "long tail" of smaller publishers still exists. Broadcast news, as at the national level, is dominated by the BBC and Sky News, though the local radio and hyperlocal sector has a wide variety of providers.

The UK local and regional media landscape consists of a local newspaper market characterised by several large recent mergers, the concentration of ownership of the majority of titles among a small number of large publishers, and a relatively long tail of smaller and independent publishers; an independent community and hyperlocal news market that is fragile but becoming increasingly professionalised; regional television provided solely by the BBC and ITV, with a tier of local television stations underneath that has experienced a series of mergers and extremely low audience engagement since the programme was launched; and a local radio market that balances the BBC's dominance in public provision with a commercial sector characterised by three large players and a large number of small and independent broadcasters. While concentration in the

local press is problematic, and local television – particularly local television news provision – is effectively a duopoly, the local radio sector has a range of different providers, even if the market is dominated by a few companies.

In terms of the local press, the UK has over 1,000 daily and weekly local newspapers, including those that no longer publish in print form, but which developed out of legacy print titles (not including independent community and hyperlocal titles, discussed below). The sector has been subjected to intense economic pressure in the twenty-first century, as classified advertising revenue moved online and as audiences for news increasingly moved online, diminishing print revenue that has only partially been replaced by rising digital revenues. The shock to the local news business model has been such that government inquiries have been launched to try to solve the problem of local public interest news sustainability after the closure of over 300 local newspapers between 2010 and 2019 (DCMS, 2019a).

Apart from the significant closures, the larger local news publishers have embarked on a series of acquisitions of, and mergers with, smaller publishers. Research by the Media Reform Coalition has shown that, as of 2019, five publishers (Newsquest, JPI Media, Reach PLC, Tindle Newspapers, and Archant) were responsible for 80 per cent of all titles, with the remaining 20 per cent made up by a long tail of 57 smaller publishers, ranging from significant publishers with limited regional scope to single-title independent publishers (Media Reform Coalition, 2019: 8). The heavy consolidation among the largest publishers has also been found to have led to a situation where increasingly large portions of the UK are now essentially local newspaper monopolies, with a single publisher providing all local print news (and their online versions) in those areas (Ramsay & Moore, 2016).

Table 6 includes the number of titles as calculated by the Media Reform Coalition (2019: 8), with revenue figures calculated for the present report from the most recent available company accounts. The revenue list is not fully complete due to the fact that the remaining unnamed 48 publishers are not obliged to publish annual revenue figures, since they satisfy the definition of a "small company" in UK company law. Some publishers (those towards the bottom of the table, such as Newbury News Ltd) qualify as small companies but publish revenue figures by choice. The complexity of local newspaper companies varies significantly: Reach PLC consists of over 200 linked corporate entities and Newsquest has almost 50 subsidiaries in the UK. The revenue figures for these two companies in Table 6 are aggregates of the revenues of their subsidiaries engaged in local news publishing (not including their printing arms). The combined revenue of the top four publishers represents 79.8 per cent of the total available revenue figures in Table 6, though this high value would certainly be diluted if revenue information was available for the remaining 48 publishers.

Table 6 *Titles and revenue of UK local newspaper publishers*

Publisher	No. of titles (2019)	Revenue (2018, GBP)
Reach PLC (Regional)	215	313,794,000
DC Thomson & Company	5	207,315,000
Newsquest (Regional)	236	206,787,000
Johnston Press	224	171,016,000
Archant	71	87,275,000
Iliffe	40	36,054,349
Midland News Association	17	28,725,000
Independent News and Media Limited	4	27,732,000
Tindle Press Holdings Limited	112	27,473,174
Scottish Provincial Press Limited	15	9,565,000
Newbury News Limited	2	2,230,627
The Barnsley Chronicle Limited	2	3,707,224
Baylis Media Limited	2	2,922,280
One Media and Creative UK Limited	2	1,335,819
Remaining 48 Publishers	121	–

There are two tiers of regional and local television in the UK: the regional services provided by the BBC and the different Channel 3 licensees who comprise the ITV network; and a range of small local television stations launched after 2012 based largely in urban areas. Outside England, in the nations of the UK, the BBC provides localised versions of its flagship BBC One and BBC Two channels in Scotland, Wales, and Northern Ireland, including programming in Irish and Ulster Scots for the latter. The BBC launched a dedicated channel for Scotland (BBC Scotland) in 2019, which runs alongside the Gaelic-language BBC Alba service. While at the time of writing there are not yet any annual figures for BBC Scotland expenditure, the corporation spent GBP 9 million on BBC Alba in 2018 (BBC, 2019a: 43). The BBC also provides significant funding to the Welsh free-to-air channel S4C, spending GBP 22 million on the service annually (BBC, 2019a: 61). English regional services are also provided across twelve areas. Each of the regional and national subdivisions also receive dedicated online coverage. Channel 3 (ITV and STV) consists of 15 regional licence-holders providing a mix of shared national and unique local programming in each area (there is also a single licence-holder for the national breakfast-time service. In practice, ITV Broadcast Ltd owns all eleven licences in England and Wales, while UTV Limited holds the Northern Ireland licence, and STV Central and STV North own the Scottish licences. The remaining licence, for the Channel Islands, is owned by Channel Television Ltd.

News programming across these regional services is a duopoly: the BBC provides all news coverage to its regional services, while all Channel 3 and ITV licence holders have their news programming supplied by Independent Television News. The size of this market is difficult to determine. The BBC reports show that GBP 261 million was spent on local television content across the nations and regions in 2018, but does not disaggregate spending on news programming within this figure, or make clear whether this figure includes news content costs at all. ITN does not break down its revenue figures to show programming spending.

A network of local television stations (Local Digital Television Programme Services – L-DTPS – in legislation) was created by the UK government in 2012, and currently extends to 26 licence-holders located largely in urban areas in the UK (Ofcom, 2020a). This tier of broadcasters reaches very low audiences, and concerns about financial viability have prevented a further expansion of the scheme, and concerns about poor quality and the reduction of their obligations to supply news mean that local television stations do not play a substantial role in the UK's media landscape (BBC, 2018b). Ownership of the stations has merged, with "That's TV" group and "Made In" group each owning several stations. Aside from the company which owns the local television licence for London, none of the owners reached the UK's thresholds for revenue reporting, and so very little data on the size of the market is available. The revenues of the company for 2018 were GBP 3.1 million.

As with national radio, local radio in the UK is split into public services supplied by the BBC, and a commercial sector dominated by Global Radio and Bauer Media. However, local radio in both analogue and digital form does include greater plurality than the national picture, and a significant amount of smaller and independent producers, though levels of concentration vary by region.

The BBC provides analogue and digital radio services across England and to the other nations of the UK, with GBP 200 million spent in total in this sector in 2018 (BBC, 2019a: 38–47). English local BBC radio consists of 40 stations, including coverage of the Channel Islands (GBP 124 million in 2018). Northern Ireland is covered by BBC Radio Ulster and BBC Radio Foyle, while Scotland and Wales receive national coverage in both English (BBC Radio Scotland and BBC Radio Wales) and in Gaelic and Welsh, respectively (BBC Radio Nan Gàidheal and BBC Radio Cymru).

According to telecommunications authority Ofcom's list of analogue radio licences, commercial analogue radio in the UK consists of 283 stations across the UK provided by a total of 57 broadcasters, of which 40 are small and independent providers (Ofcom, 2020b). Research by the Media Reform Coalition has calculated that Global Radio (80 stations) and Bauer Media (50 stations) own 46 per cent of all analogue local commercial stations – strong market positions,

but considerably less than they enjoy in the national market (Media Reform Coalition, 2019: 20). Global Radio and Bauer Media are more dominant in the local digital radio market, however, with these companies owning 67 per cent of 370 local digital stations: 138 stations owned by Global Radio and 112 by Bauer Media. 62 companies (including 32 independents) own the remaining 120 stations (ukdigitalradio.com, n.d.). Concentration varies across regions, however, with Global and Bauer owning 87 per cent of local digital stations in Northern Ireland and 85 per cent in the North of England, but just 43 per cent in Greater London and 36 per cent in Wales (Media Reform Coalition, 2019: 21).

Market concentration in terms of revenue is difficult to determine in the UK radio sector at both the national and local level, due to the lack of revenue figures for smaller broadcasters and difficulties in disaggregating local and national revenues for the larger publishers, particularly Global Radio and Bauer Media. Ofcom estimates UK local commercial radio revenues for 2018 to be GBP 129 million, though this does not distinguish between analogue and digital services. Commercial sponsorship figures as reported by Ofcom do not disaggregate national or local portions of the GBP 107 million total (Ofcom, 2019f: slide 10; see also Indicator E1 – Media ownership concentration national level).

An additional tier of radio broadcasting is supplied by community radio stations. Ofcom records 296 community stations across the country (Ofcom 2020c). Most are very small enterprises run largely on voluntary labour, with a combined sector income of approximately GBP 12 million in 2018 and a median income per station of approximately GBP 30,000 (Ofcom 2019: slide 14).

The local radio news market consists of the same duopoly as national radio: the BBC provides news across its outlets, while commercial radio stations broadcast news produced by Sky News Radio. As with the national market, since Sky Plc does not report the portion of its expenditure on, or revenue derived from, radio operations. BBC funding figures for news provision also do not specify how much of the GBP 355 million total is allocated to radio. The most that can be said is that the local radio news market is concentrated, in the sense that it is almost entirely provided by two organisations.

Considering community and hyperlocal news media, the Independent Community News Network (ICNN), a support network for the sector, reports more than 300 community and hyperlocal news sites in the UK (Centre for Community Journalism, n.d.-b). It is, however, difficult to confirm the size of the market, since there is such variation in types of hyperlocal entity, and not all are profit-seeking enterprises. Previous estimates have put the number of hyperlocals in the UK at 550 (Ramsay & Moore, 2016: 40). A 2016 survey of hyperlocals found that one-third made money, but only one in ten reported generating more than GBP 500 per month in revenue (Williams, 2016). While this is a valuable addition to local news pluralism in the UK, the sector remains

small and financially precarious. It therefore only very partially offsets the concentration in the local newspaper sector.

(E3) Diversity of news formats

3 POINTS

IN 2011
3 POINTS

The UK news landscape is characterised by a wide range of news formats across all platforms.

There is a very diverse range of news formats across broadcast, print, and online news providers in the UK, spanning traditional platform-specific formats such as fixed-schedule television bulletins and print newspapers, to innovative interactive and long-form online journalism, to satirical news sources and podcasts.

Considering television news formats, fixed-schedule bulletins continue to be the mainstay of television news programming in the UK. The designated Public Service Broadcasters with statutory obligations to provide news programming on their channels – BBC One; ITV and Channel 3; and Channel 4 and Channel 5 – each broadcast several bulletins on weekdays, with reduced obligations at weekends. Bulletins on BBC One – including the channel's flagship evening bulletin *News at Six* which commands the largest television news audience in the UK – ITV and Channel 5 are "general purpose" bulletins, covering a range of topics over a 20–30-minute bulletin. Channel 4's nightly bulletin is an hour in length and includes longer segments, more international news and investigative content. BBC One and ITV also host regional and local television news bulletins, typically appended to the main scheduled national programmes. The BBC also broadcasts *Newsround*, a daily news bulletin for children shown on the CBBC Channel (until 2012 it was also broadcast on BBC One).

There is also a wide range of current affairs programming on the UK's PSB channels. These consist of pre-recorded investigative journalism programmes, such as the BBC One's *Panorama*, ITV's *Tonight*, or Channel 4's *Dispatches*, mixed live and recorded programmes like BBC Two's weeknight show *Newsnight*, and panel discussion shows such as *The Andrew Neil Show* on BBC and *Peston* on ITV. Current affairs programming for Scottish, Welsh, and Northern Irish audiences is also broadcast.

24-hour news programming is also provided on the BBC News channel and BBC Parliament, and on the Sky News channel. In addition to reactive rolling news coverage, BBC News and Sky News provide a mix of bulletins (including simultaneous broadcasting of BBC One bulletins by BBC News) and pre-recorded programming, including international reporting, travel, and discussion shows. Both channels also host nightly discussion shows reviewing the following morning's newspaper front pages, typically released in time for these programmes. Sky also operates a 24-hour sports news channel, Sky Sports News.

Finally, there are some popular satirical programmes that review news and current affairs, such as BBC One's long-running weekly news review panel show *Have I Got News For You* and Channel 4's combination talk-show and news review show *The Last Leg*.

Considering radio news formats, the BBC broadcasts a twice-daily fifteen-minute news flagship news bulletin, *Newsbeat*, tailored to younger audiences, on its main music-based radio station, Radio 1, and on the BBC Asian Network. The BBC's remaining music-based radio stations include short hourly news roundups, while Radio 2 has some news review and discussion programmes. BBC Radio 4 is the Corporation's main spoken-word station, which includes a large amount of news and current affairs programming, including the agenda-setting early-morning *Today* programme, the parliamentary review programme *Today in Parliament*, current-affairs shows like *File on 4*, and international news on programmes such as *From Our Own Correspondent*. BBC Radio 5 Live broadcasts news alongside other live coverage such as phone-ins, interviews, and sport. The BBC's radio news programming is replicated in its specialised Welsh, Scottish, and Northern Irish stations as well as its network of local stations in England. Commercial music radio stations in the UK run short news roundups supplied by Sky News, and several talk radio stations operate nationwide, including talkSPORT and LBC.

In terms of print news formats, the national press consists of a mix of tabloid, mid-market, and broadsheet newspapers, each of which presents news in different ways to different target audiences. Each newspaper also includes a range of news formats, from reportage to comment pieces and leader columns. Some significant news and current affairs magazines also circulate, such as *The Spectator* and the *New Statesman* as well as the satirical *Private Eye*, each of which contain commentary and current affairs reporting in their print editions. Local newspapers largely provide localised versions of the output of the national press, but a network of hyperlocal sites (skewing more online than persisting with print) has emerged over the past two decades, providing a varied range of different approaches to newsgathering and reporting.

Looking at online news formats, most legacy print and broadcast news providers also now provide a range of different news formats online, and "live" or rolling text-based and multimedia news articles are a popular new means of conveying news. Podcasts are now available from several newspapers (such as the *The Guardian*) and news magazines (such as *The Spectator*), and online news provision allows for multimedia news stories (typically a mix of text and video clips), though some providers, such as the BBC and *The Guardian*, experiment with more integrated multimedia and interactive storytelling. New types of news sites with significant resources have also emerged, including partisan or commentary sites, such as *The Canary* or *UnHerd*, respectively, campaigning

news sites such as *openDemocracy*, and long-form investigative journalism sites like *Tortoise*. All provide new versions of familiar news formats.

(E4) Minority/Alternative media

3 POINTS

In 2011
3 POINTS

The BBC devotes significant funding to minority-language news in Scotland and Wales, and the BBC Asian Network is also aimed at minority audiences. Commercial minority media covering many language groups and communities are licensed by Ofcom and several are available in print and online.

The UK has a wide range of minority media across all platforms and serving many of the UK's minority groups, from South Asian diasporas to the Jewish community and smaller minority and language groups such as the traveller and Roma communities. The BBC also operates television and radio channels broadcasting in Welsh and Gaelic.

The BBC provides programming and news in Gaelic on television (BBC Alba) and radio (BBC Radio nan Gàidheal), and in Welsh through its contributions to the television channel S4C and the Welsh-language radio station BBC Radio Cymru. The Corporation also operates the BBC Asian Network on national analogue and digital radio for British Asians. The station broadcasts mostly in English, but also offers programming in other languages. Altogether, the BBC spent GBP 57 million on Welsh and Gaelic radio, S4C, and the BBC Asian Network in 2018 and 2019 (BBC, 2019a).

Minority and ethnic programming on commercial digital television is provided by a range of channels licensed by Ofcom. For example, Al Araby Television, based in London, broadcasts news, factual, and entertainment programming in Arabic, while Dunya TV offers a similar service in Urdu. Many commercial radio stations serve minority communities, including Gaelic broadcasting (Cuillin FM), South Asian communities (for example, Lyca Radio and Dilse Radio), and Polish-language broadcasting (Polski Radio Londyn).

A range of minority newspapers (and their online counterparts) is also available within the UK. *The Jewish Chronicle* is a weekly newspaper based in London, and has been publishing since 1841 (Jewish Chronicle, 2016). Some Polish-language newspapers have been in circulation for some time, such as *Dziennek Polski* and the *Polish Express*. These have been joined by more recent additions such as *Cooltura 24*, which publishes online and in print (and is regulated by Impress). The gypsy, traveller, and Roma communities are served by the *Travellers' Times*, a bi-annual publication regulated by IPSO, which also publishes online throughout the year. *Ashraq Al Awsat* is a London-based Arabic newspaper, while a range of newspapers in South Asian languages are available, including the *Urdu Times*.

(E5) Affordable public and private news media

3 POINTS

IN 2011
3 POINTS

News in the UK (across all platforms) is generally affordable compared to average household income. Online output by several national and most regional outlets is free to access online.

The affordability of mainstream news is not a problem in the UK. The average household income in the UK in 2019 was GBP 29,400 in 2019 (approx. EUR 32,600 or USD 36,600) (Office for National Statistics, 2019). All broadcast news in the UK is available for the cost of the television licence fee (GBP 157.20 and free to all over-75s at the time of writing), with commercial public service broadcasters funded by advertising and free to access. All public service channels plus Sky News are available on the digital Freeview service, usually built into modern televisions or accessible via a separate box and available for around GBP 20. National digital radio channels and BBC local radio stations are also available on Freeview.

Monthly unlimited broadband costs in the UK begin at around GBP 20 (Cable.co.uk, n.d.), and unlimited mobile data plans also begin at similar prices (Choose.co.uk, 2019). These are the basic minimum costs needed for household or individual access to news online. Once online, most broadcast news content can be accessed for free, though access to previously broadcast news on the BBC's catch-up *iPlayer* service requires users to have a television licence. National newspapers have gradually introduced paywalls for some or all of their content, but *The Sun* (which used a paywall between 2013 and 2015), *Mirror*, *Daily Mail*, *Daily Express*, *Daily Star*, the *i*, *The Independent*, and *The Guardian* are all free to access (though *The Guardian* requires registration and employs a voluntary membership payment scheme). The mobile apps for each of these titles is also free to access. Digital subscriptions are necessary to access *The Times* (GBP 26 per month for standard subscription, excluding introductory offers), *The Telegraph* (GBP 6 per week) and *The Financial Times* (GBP 33 per month). The leading news magazines also offer digital subscriptions: *The Spectator* at GBP 10 per month, the *New Statesman* at GBP 120 annually or GBP 10 per month, and *The Economist* at GBP 179 annually (approx. GBP 15 per month). Local and regional newspapers have traditionally been free to access online, although some publishers are preparing to introduce paywalls (Tobitt, 2020).

Cover prices for print newspapers range from under GBP 1 for weekday copies (all tabloid and mid-market titles) to GBP 2–3 for broadsheet newspapers. Saturday, Sunday, and weekend editions of each newspaper tend to be priced slightly higher than weekday copies. Publishers are less likely to offer print-only subscriptions now, with some instead offering print and digital subscription packages, for example *The Guardian*'s multi-platform subscription for GBP 55 per month and *The Financial Times* offering print and digital subscriptions for GBP 63 per month. These are by far the most expensive routes to access news content.

(E6) Content monitoring instruments

1 POINT

IN 2011
2 POINTS

The UK has no public media monitor, though piecemeal monitoring is conducted by NGOs and academic units, some self-monitoring mechanisms are operated by broadcasters, and there are some transparency obligations on regulated media that comprise informal monitoring instruments.

The UK has no dedicated public news monitoring instrument. There are, however, a modest range of monitoring services conducted by some news organisations, some of which are explicitly for the benefit of the public, and the newspaper industry's self-regulatory bodies provide periodic information on standards compliance (so therefore only indirectly about content). There is a significant number of external organisations in academia and in civil society that operate different content monitoring instruments.

Content monitoring and accountability mechanisms are operated by some news organisations, though these tend to be reactive and based on audience feedback, or periodic releases of information. In broadcasting, the BBC produces a programme, *Newswatch*, broadcast weekly for most of the year, which addresses listener and viewer complaints about its news coverage, offering a right of reply for both audiences and BBC News personnel. *The Guardian* newspaper employs a readers' editor to address audience concerns and report on issues with news content. Members of IPSO, the self-regulatory body set up by several newspaper publishers, are obliged to publish data on the extent to which their reporting complies with an agreed standards code (IPSO, 2019a), in theory a process of continual – if periodic – oversight, but in practice the reporting criteria do not oblige them to publish sufficient data for audiences to obtain a clear picture of qualitative trends in news content (Media Standards Trust, 2019).

Various academic institutions conduct systematic media content monitoring. Some examples include the Cardiff University School of Journalism, Media and Culture, which collects and analyses audiovisual news content as well as online news, producing empirical content analyses of broadcasters' adherence to impartiality guidelines (Cushion et al., 2010) as well as analyses of media coverage of election campaigns (Cushion & Thomas, 2016). Election coverage monitoring is also regularly conducted at Loughborough University (Deacon et al., n.d.), the Reuters Institute for the Study of Journalism at Oxford University (Levy et al., 2016), the Centre for the Study of Media Communication and Power at King's College London (Moore & Ramsay, 2015), and elsewhere. These are, however, generally episodic analyses of news content at important political moments, rather than continual monitoring and health-checking of trends in coverage.

Various non-governmental organisations (NGOs) have provided episodic media monitoring. The Media Standards Trust is a media policy think-tank that

has, among other things, conducted content analyses of news media coverage of regulatory issues and during election campaigns (Media Standards Trust, 2015). The BBC is also subject to monitoring by an organisation called News-Watch, which is extremely critical of the Corporation and focuses on news and current affairs coverage of the EU. Other organisations focus their monitoring operations on the performance of media regulators, rather than on news content itself, though often publicise problematic trends in news coverage in the course of their advocacy work. Organisations of this type include Hacked Off, a campaigning organisation pushing for reform of press regulation, and Tell Mama, an organisation assisting victims of anti-Muslim hatred that addresses coverage of Muslims in the UK press.

Overall, therefore, there is a significant amount of news content monitoring that takes place in the UK, though it is decentralised and scattered across a number of organisations rather than provided by a dedicated public entity.

(E7) Code of ethics at the national level

3 POINTS

IN 2011
2 POINTS

UK news media are variously covered by five separate codes of ethics that apply nationwide. Broadcast news provision is underpinned by legislation.

There are five separate codes of ethics covering journalism in the UK. All operate at the national level among qualifying or member organisations and cover the vast majority of significant news organisations in broadcast, print, and online (with some significant exceptions). An additional code of practice issued by the National Union of Journalists (NUJ) covers the ethical conduct of journalists. The codes are as follows:

- the BBC's editorial guidelines, Royal Charter, and agreement (covering all of the BBC's news output as well as the rest of the Corporation's programming);
- Ofcom's Broadcasting Code (covering all holders of broadcasting licences issued by Ofcom);
- the Editor's Code of Practice (covering all members of the newspaper industry's regulator, IPSO);
- the IMPRESS Standards Code (covering all members of the independent regulator, the Independent Monitor for the Press);
- and the NUJ code of conduct (covering all journalists who are members of the Union).

The BBC's accountability mechanisms are covered by aspects of the Royal Charter and the Agreement that sits alongside each iteration of the Charter

(DCMS, 2016b). Schedule 3 of the Agreement includes the obligation that the BBC produce Editorial Guidelines, the current version of which is a 220-page document with 18 sections, of which 15 relate to the production of content. Some apply directly to journalism and news coverage, including sections on accuracy, impartiality, and the coverage of politics, public policy, and polls (BBC, 2019c). The BBC's Charter itself includes rules regarding the conduct of the BBC, including setting out the BBC's five public purposes which enshrine the Corporation's obligation to provide duly accurate and impartial news, current affairs, and factual programming (see Indicator C8 – Professional training) (DCMS, 2016a).

While the Charter and Agreement are the main legal documents setting out the BBC's rules and guidelines, since 2017, regulation of BBC programming has been the responsibility of Ofcom. Ofcom licenses and regulates all other broadcast licence holders and is required by law to create and implement a Broadcasting Code that all broadcasters must adhere to. The Ofcom Broadcasting Code covers ten principles, organised into sections and a series of rules and clarifications:

1. Protecting the Under-Eighteens
2. Harm and Offence
3. Crime, Disorder, Hatred and Abuse
4. Religion
5. Due Impartiality and Due Accuracy and Undue Prominence of Views and Opinions
6. Elections and Referendums
7. Fairness
8. Privacy
9. Commercial References in Television Programming
10. Commercial Communications in Radio Programming

(Ofcom, 2019d)

Of these, sections five and six are of specific importance for news programming. Section five describes Ofcom's rules relating to duty of broadcasters "[to] ensure that news, in whatever form, is reported with due accuracy and presented with due impartiality" (Ofcom, 2019d: 28). Section five also outlines special impartiality guidelines for news and other programmes, relating to "matters of political or industrial controversy and matters relating to current public policy" (Ofcom, 2019d: 29). Section six is complementary to section five and governs news coverage during election campaigns and referendums, including how

candidates and constituencies may be covered and restrictions on broadcasting, for example, on coverage of opinion polls and campaigning on polling day.

Those newspapers (and their online components, where separate) that are members of IPSO are regulated on the basis of their compliance with the Editors' Code of Practice – a document created and maintained largely by editors and ultimately the property of a Regulatory Funding Company – the funding body for IPSO controlled by the newspaper industry. While there have been forensic analyses of the extent to which IPSO is able to enforce the Code (Media Standards Trust, 2019), the document itself is relatively uncontroversial, and the contractual agreement between the regulator and its members is predicated on their observance of the guidelines in the Code. The Code includes 16 clauses plus a definition of the public interest that can be invoked under exceptional circumstances if a journalist chooses to disregard the Code in pursuit of a story (Editors' Code of Practice Committee, 2019). IMPRESS (Independent Monitor for the Press) is an independent regulator created in order to fulfil the criteria for a new regulatory body set out in the 2012 Leveson Report. In 2016, it was given official recognition as meeting these criteria, one of which is the implementation of a standards code to serve as the basis for a self-regulatory system. The resulting code, the IMPRESS Standards Code, was produced with input from the general public, and covers many of the same broad areas as the Editors' Code of Practice, with some adjustments (IMPRESS, n.d.). Those journalists that are members of the National Union of Journalists are also obliged to adhere to the code of professional ethics in the NUJ code of conduct. While these relate more to the professional conduct of individual journalists, several of the clauses concern the ways in which news stories can be pursued and produced (NUJ, 2011). Finally, three national newspapers – *The Guardian*, *The Independent* (digital-only since 2016), and *The Financial Times* – have chosen not to join either IPSO or IMPRESS, and therefore do not subscribe to a nationwide code of conduct, though all three maintain their own editorial standards and internal complaints-handling mechanisms.

(E8) Level of self-regulation

2 POINTS

IN 2011
2 POINTS

The UK print and online news media are subject to self-regulation. Broadcast regulation is managed by a statutory corporation that is not directly controlled by the state, though its guidelines are underpinned by statute.

All major news organisations in the UK implement a code of practice in their newsgathering and reporting activities (see Indicator E7 – Code of ethics at the national level). Those significant news organisations that are not subject to regulation by an external body (*The Guardian*, *The Independent*, and *The Financial Times*) operate their own internal self-regulatory systems. Broadcast-

ers are bound by the Ofcom Broadcasting Code (and BBC News is additionally subject to the Corporation's Editorial Guidelines that build upon aspects of the Ofcom Code). The extent to which all self-regulatory systems operating in the UK's new media are effective is more debatable. Questions have been raised about the extent to which IPSO – the regulator set up by parts of the newspaper industry is able to police the compliance of its own members, but gaps in data collection by IPSO obscure any evidence of systemic failures in compliance.

The three national newspapers that have elected not to join IPSO, or its competitor the Independent Monitor for the Press (IMPRESS), now operate their own complaints and compliance systems. *The Guardian* has appointed a Readers' Editor as an internal ombudsperson since 1997, and the newspaper continues to apply a variant of the Editors' Code of Practice used by IPSO's members (The Guardian, 2014). On top of this standards code governing content, *The Guardian* also applies its own editorial guidelines covering professional practice and the personal behaviour of its journalists (The Guardian, 2020). The owner of *The Independent* applies a company-wide code of conduct to its print journalism that also covers the company's broadcast news content on local television news channel London Live (subject to the Ofcom Broadcasting Code). The code of conduct covers pre-publication issues (such as respect for privacy and discrimination) and post-publication complaints-handling and correction guidelines (Independent, n.d.). Finally, the self-regulatory system operated by the *The Financial Times* consists of an Editorial Code of Practice that incorporates the Editors' Code of Practice maintained by IPSO (Financial Times, 2020), with unresolved complaints being handled by a Complaints Commissioner, who is in turn overseen by an Appointments and Oversight Committee (Financial Times, n.d.-a).

The remaining national newspapers and the majority of the local newspaper industry are members of IPSO and are therefore contractually obliged to implement the Editors' Code of Practice and to specify in publicly available annual statements to IPSO the extent to which they comply with the regulator's rules and regulations (including adherence to the Code of Practice). Annex A of IPSO's Regulations (revised most recently in September 2019) specify the information that must be included in members' annual statements. Section 2 specifies that members must include copies of any internal manuals, codes, or guidance used by journalists, while section 3 requires members to include brief details of the compliance process, including "Compliance with the Editors' Code" (IPSO, 2019b: 17). In practice, however, IPSO does not effectively enforce this aspect of the regulations. The most recent annual statement by Associated Newspapers on the IPSO site shows that the publisher of the *Daily Mail*, *Mail on Sunday*, and *Mail Online* does include internal manuals for journalists (on the process of verifying stories), but does not contain any statistics on complaints handled internally by the Associated Newspapers titles, instead including only statistics

on complaints that had subsequently been escalated to IPSO's complaints-handling mechanism (Associated Newspapers, 2018). A review of the 2019 annual statements of all of IPSO's national newspaper publisher members has found that none provided evidence of their internal complaints-handling statistics, and that other large publishing groups such as News UK & Ireland (publisher of *The Times*, *The Sunday Times*, and *The Sun*) did not include their internal manuals for journalists (Ramsay & Barnett, in press).

The independent regulator, the Independent Monitor for the Press (IMPRESS), operates a regulatory system in line with the recommendations of the report issued following the 2011–2012 Inquiry into the Culture, Practice and Ethics of the Press (better known as the Leveson Inquiry, after its Chair, Lord Justice Brian Leveson), set up in the wake of the 2011 phone-hacking scandal (e.g., Ramsay & Moore, 2019). Like the IPSO system, IMPRESS requires that all members supply the regulator with information about their internal governance processes, including their adherence to the IMPRESS Standards Code, and periodically audits the internal compliance systems of each member through a system of annual compliance returns. IMPRESS publishes all complaints statistics for members (including internally handled complaints) online (IMPRESS, 2019: 26–29).

While broadcast regulation is not purely self-regulation, in the sense that the duties of Ofcom are set out broadly in the Communications Act 2003, and the BBC's Editorial Guidelines are set out in the Royal Charter and agreement, they do represent a set of compliance procedures integrated into the operations of broadcast news providers. Ofcom's licensing regime is based on licence holders adhering to the Broadcasting Code, which has detailed guidelines on news reporting. The regulator publishes weekly summaries of all programmes that receive ten or more complaints (Ofcom, 2020d). Despite the BBC ultimately being regulated by Ofcom, it is obliged to maintain its own complaints procedures and statistics, and publishes fortnightly complaints reports (BBC, n.d.-b). The BBC also publishes its compliance record with the Ofcom Broadcasting Code and its internal compliance with its own Editorial Guidelines (BBC, 2019a: 134–135).

(E9) Participation

2 POINTS

IN 2011
2 POINTS

Different news organisations in the UK offer different avenues of participation for audiences. Many comments sections have been scaled back or removed due to difficulties in moderating abuse.

Participation in UK news content is somewhat patchy and uneven. Some newspaper sites allow relatively free and unrestricted comments, while others limit

access to subscribers. The BBC allows online commentary on selected stories, while other broadcasters don't include comments sections alongside their online content. The BBC also broadcasts regular programming that allows direct right of reply to audiences about news coverage, or includes members of the public in live discussion of news and current affairs (on television and radio). Live phone-ins on commercial radio shows are common, with the expansion of dedicated talk radio stations in recent years.

The websites of the UK's tabloid and mid-market newspapers generally allow users to comment alongside articles. *Mail Online*, for example – the sister site for newspapers the *Daily Mail* and *Mail on Sunday* – offers unmoderated and moderated comments sections for different stories, although comments are disabled on some articles for legal reasons or due to the sensitivity of the content – a practice employed by other newspapers. Comments sections on the sites of broadsheet newspapers tend to be less open, either because comments have been restricted or because paywalls are in place, limiting comments to communities of subscribers rather than the public as a whole. *The Telegraph* in 2020 restricted comments on its news sites to subscribers only, matching sites like *The Times* and *The Financial Times*, which operate hard paywalls (Telegraph, 2020). *The Guardian* cut back its comment functions in 2016 due to difficulties in restricting abuse and disruption by users within comment threads (Hamilton, 2016).

Online, the BBC allows users to comment on selected news stories. Comments are moderated in accordance with a series of rules on acceptable content (BBC, 2018c). ITV News, Channel 4 News, and Sky News do not allow user comments on their websites, although – as with newspaper sites – stories and articles are routinely shared on social media.

In its broadcast output, the BBC produces several programmes featuring members of the public contributing to political discussion or responding to news or other programmes. *Newswatch*, aired on the BBC News channel, consists of audience complaints and views on the BBC's news coverage across all platforms and includes on-air responses from editors and decision-makers (BBC, n.d.-c). *Question Time* is a long-running panel discussion programme where political figures respond to questions about current events from a studio audience. The BBC's regional and local radio programming features regular phone-in shows, as does the national station BBC Radio 5 Live (for example, on the *5 Live Breakfast* programme).

Other broadcasters offer fewer opportunities for on-air feedback to news provision, though commercial talk radio stations such as LBC and talkSPORT make extensive use of phone-ins on political topics as well as (in the latter case) sports.

(E10) Rules and practices on internal pluralism

2 POINTS

IN 2011
2 POINTS

UK broadcast news is subject to strict rules on impartiality and the representation of views on any programming dealing with controversial or political matters. Newspapers are free to be partisan but usually provide at least some space for opposing voices or views.

British broadcasters are subject to strict guidelines on impartiality issued in the Ofcom Broadcasting Code, underpinned by legislation and, in the case of the BBC, also the Royal Charter (see Indicator E7 – Code of ethics at the national level). These rules govern the representation of a range of views in political news coverage across all broadcasters. Section Five of the Broadcasting Code, on "Due impartiality and due accuracy" contains the following rule:

> In dealing with matters of major political and industrial controversy and major matters relating to current public policy an appropriately wide range of significant views must be included and given due weight in each programme or in clearly linked and timely programmes. Views and facts must not be misrepresented. (Ofcom, 2019d: 31)

Broadcasters are also not permitted to give "undue prominence of views and opinions", defined as a significant imbalance of views within their news coverage. Section Six of the Code sets out additional rules on the representation of views in coverage of elections and referendums. The ways in which broadcasters have interpreted these rules have been subject to criticism, with the BBC in particular scrutinised for implementing a policy of "impartiality-as-balance", leading to the distorting reduction of complex issues to two-sided arguments and the unnecessary reduction of issues to areas of zero-sum partisan conflict (Wahl-Jorgensen et al., 2017). Evidence also suggests that UK broadcasters can follow news agendas set by the more partisan press (Cushion et al., 2016).

The UK national press is subject to a more laissez-faire self-regulation regime and has traditionally been much more openly partisan (Bayram, 2013). During perhaps the most divisive issue of recent years, the 2016 referendum on the UK's membership in the EU, the UK press focused heavily on a relatively narrow range of sources, with certain voices – such as those of immigrants – almost entirely absent from a large section of the press. Coverage was extremely partisan in certain titles, particularly those most in support of the campaign to leave the EU (Moore & Ramsay, 2017). Despite this partisanship, however, newspapers rarely exclude alternative voices entirely in their political coverage, with titles offering space for commentary by, or interviews with, politicians from parties other than those supported by the editorial line. Some news sources, such as the magazine *The Spectator*, offer space to a range of opposing voices. The regional and local press is also less openly partisan than national newspapers.

Dimension: Control / Watchdog (C)

(C1) Supervising the watchdog "control of the controllers"

3 POINTS
In 2011
2 POINTS

Though UK news outlets have in the past been criticised for a reluctance to investigate or scrutinise their peers, several publications and broadcast channels have dedicated media beats, including indirect scrutiny through news review programmes. NGOs play a significant role in scrutinising the media industries and their regulatory structures.

Beyond the official regulatory bodies for broadcasters and self-regulatory bodies for newspapers and online journalism, a degree of media scrutiny and monitoring is conducted by a range of non-governmental organisations (NGOs), academic units, and online groups. Across news organisations themselves are examples of self-monitoring and correction, media "beats" within some titles, and indirect scrutiny of media behaviour. Though there has historically been a degree of reluctance among newspapers to closely scrutinise their peers, when high-profile media stories break, they tend to be covered with prominence.

Among NGOs, the National Union of Journalists plays a significant role in scrutinising and campaigning about the business practices of news organisations, while several campaigning organisations monitor media behaviour and campaign for regulatory reform of parts of the newspaper industry, and several units at academic institutions provide research, including dedicated content analysis of the news media (see Indicator E6 – Content monitoring instruments).

The news media themselves have in the past been accused of failing to report on wrongdoing at other titles, an accusation levelled at newspapers in the years before the 2011 phone-hacking scandal finally reached public attention (Leveson Inquiry, 2012b). Certain legacy print titles, such as *The Guardian* and *Private Eye*, have dedicated media correspondents and columns, though other similar units elsewhere have been discontinued in recent years (such as the closure of *Buzzfeed* UK's political journalism department in 2020, which often scrutinised the news industry). The BBC engages in self-monitoring with its *Newswatch* programme, has a weekly *Media Show* on Radio 4 that scrutinises the industry, and an element of indirect scrutiny of news media is provided by late-night and early-morning newspaper review programmes on the BBC and Sky News.

(C2) Independence of the news media from powerholders

2 POINTS
IN 2011
3 POINTS

UK broadcasters are broadly insulated from interference, despite recent government pressure on the BBC. Commercial news organisations are owned by media companies, and there is no recent tradition of party, church, or industry-owned news organisations.

The UK's news organisations are owned by media companies; there is no significant ownership by powerful organisations, by political parties or movements, or by religious groups. While some "diagonal" or lateral cross-ownership has taken place in the wider media industries (for example, telecommunications infrastructure provider BT moving into subscription sports coverage), this has not been the case in news provision.

Ownership of UK news providers (see Indicators E1 & E2 – Media ownership concentration national and regional levels) is summarised by the Media Reform Coalition's media ownership reports (Media Reform Coalition, 2019). While some news publishers are ultimately owned by overseas companies, in all cases, these are primarily news and media companies: Channel 5 is owned by Viacom; regional publisher Newsquest by Gannett; and *The Financial Times* by Nikkei Inc. One anomaly is the ownership of *The Independent* and London *Evening Standard* by Russian businessman Alexander Lebedev; *The Independent* has also received significant investment from Saudi Arabia, prompting an investigation by the Competition and Markets Authority. The Secretary of State for Culture, Media, and Sport closed the investigation in September 2019, noting that there was greater need for clarity over the ultimate ownership of a 30 per cent stake in *The Independent*'s parent company (DCMS, 2019b).

While Rupert Murdoch, ultimate owner of the publishers of *The Times* and *The Sun* national newspapers as well as – historically – various worldwide media interests, has been relatively open about his influence within his newsrooms (see Indicator F5 – Company rules against *internal* influence on newsroom/editorial staff), there is little direct evidence of owners or shareholders doing so systematically in other media organisations.

There is no formal party press in the UK, and while partisanship is relatively open at the organisational level, with the majority of newspapers tending to favour the Conservative Party but some high-profile changes of allegiances in the past, journalists (engaged in reporting, distinct from columnists engaging in punditry) rarely articulate their political leanings or loyalties. Broadcast journalists are prohibited from doing so in their work by the Ofcom Broadcasting Code; the impartiality guidelines implicit in the Code's sections about news programming also mitigate against political influence in broadcast news. Broadcasting legislation and the BBC Royal Charter are designed to ensure

arm's-length separation of the state and public service broadcasters, although there have been a number of recent cases where governments have been able to exert indirect pressure on the BBC and have threatened intervention in other PSBs (see also Indicator F6 – Company rules against *external* influence on newsroom/editorial staff).

(C3) Transparency of data on leading news media

3 POINTS

In 2011
2 POINTS

Information on media companies, including accounts, ownership, and board composition, is compiled by the government and available to view online. Publicly traded companies and some broadcasters publish detailed revenue information annually, and Ofcom provides several annual market reports.

All UK legislation relating to the media industries is freely available online, as is company information, including annual accounts and details of owners and board members. Many media organisations publish more detailed annual reports including revenue breakdowns and other information. Overall, data on the industry is generally freely available and suitably detailed for the public to inform themselves about the state of the UK news media.

All companies, regardless of ownership, that operate in the UK are publicly registered with the UK's registrar of companies, Companies House. Companies must disclose basic information, including the identities of board members and other officers. Those companies that do not fulfil the criteria of "small company" or "micro-entity" (based on a combination of criteria including revenue, number of employees, and balance sheet) must also provide full, audited annual accounts. In practice, this covers most national media organisations and the larger local newspaper publishers. Some smaller companies, such as news magazine publishers, local papers, and smaller local radio and television stations, fall below the reporting threshold and may only supply abridged annual accounts. This information is publicly available and searchable at the UK government website's search portal for Companies House (Gov.uk, n.d-a). Publicly-traded corporations, including several news publishers such as Reach PLC, also publish detailed annual reports that are also widely available (Reach PLC, 2019).

In broadcasting, the BBC has various obligations to release data on its finances, expenditure, policies, and remuneration of high-salaried employees. All the constitutional documents underpinning the BBC are publicly available, and the corporation publishes the editorial guidelines that underpin its news reporting and other programming. Ofcom conducts several annual and one-off reports and reviews and makes the resulting reports available online. Ofcom also maintains public lists of all broadcast licence holders in the UK, as well as other information about the communications industry and infrastructure.

(C4) Journalism professionalism

2 POINTS

IN 2011
2 POINTS

Journalism qualifications are now widely held, and training, including ethics training, is freely available and used by a majority of journalists. Some journalists report increasing newsroom pressures as exerting a detrimental effect on their quality of work.

Ethics training in UK journalism is relatively widespread and, as demonstrated in recent surveys of working journalists, broadly viewed as satisfactory (for details on increased journalistic professionalism in the sense of formal qualifications and training, see Indicator C8 – Professional training). It is also directly supported by the National Union of Journalists, which operates an ethics council, an ethical code of conduct, and advice for journalists. However, the workload intensity of UK journalists and the need for an evolving skillset to cope with industry changes is seen as inhibiting the ability of editorial staff to maintain their desired quality of work, particularly among newspaper journalists. Several studies of UK journalism in recent years have highlighted the effect of economic pressures on the quality of journalistic output.

The National Council for the Training of Journalists (NCTJ), from which 65 per cent of UK journalists hold a qualification (Spilsbury, 2018: 18), lists "Essential journalism ethics and regulation" as one of the core skills of its Diploma in Journalism qualification. The BBC, which operates an extensive training programme for its journalists via the BBC Academy, is obliged to do so by constitutional documents, the Royal Charter (Clause 35), and Agreement (Clause 13) in ensuring that the corporation delivers its public purposes (DCMS, 2016a, 2016b).

The *2018 Journalists at Work* survey found that 74 per cent of UK journalists across all sectors felt that they had received sufficient training in ethics, a substantial increase from 52 per cent from the previous survey in 2012. 85 per cent felt that their personal work in the workplace "reflects and respects" ethical boundaries, although 31 per cent claim that "business pressures in my workplace mean that ethical boundaries are sometimes not respected" (Spilsbury, 2018: 82–83). The National Union of Journalists – of which 35 per cent of journalists are members, according to the *Journalists at Work* survey (Spilsbury, 2018: 81) – operates an additional level of ethical training for member journalists. The Union operates an Ethics Council, which provides advice and information on journalistic ethics and produces the NUJ's code of conduct, which sets out twelve professional principles that NUJ members are expected to observe (NUJ, 2011). Members also have access to the NUJ ethics hotline.

Increasing newsroom pressures on the working practices of UK journalists are having a significant depressing effect on the delivery of original journalism, particularly resource-intensive but socially important public-interest and investigative journalism. Table 7 shows the concerns of UK journalists regarding the

negative effects that industry changes are exerting on their ability to perform their jobs. Some concerns relate to the need for new skills and greater flexibility in producing journalism: 85 per cent of respondents to the 2018 Journalists at Work survey stated that they faced an increased need to widen the range of tasks they are obliged to perform as part of their day-to-day work, and 67 per cent had to produce content across multiple platforms. Alongside this, journalists raise concerns about their capacity to produce high-quality journalism: 70 per cent cite "increased work intensity" – the need to develop more stories (indirectly confirming that less time is available to develop each story); 35 per cent report a lower job satisfaction as a result of industry changes; while – of significant concern given the democratic and social function of journalism – 34 per cent felt that they were forced to engaged in "de-skilled" research activities, necessitating a reliance on external copy, including from PR companies, while 34 per cent claimed that industry changes mean that they produce a lower quality of work.

Table 7 *Effect of industry changes in last ten years (per cent)*

Change	Impact on respondent's job
Increased need for multi-skilling – for example need to widen range of tasks	85
Increased work intensity – for example need to develop more stories	70
More diverse range of outlets – need to be able to write across different platforms	67
Lower job satisfaction	35
De-skilled research activities – for example more reliance on PR companies	34
Produce a lower quality of work	34

Source: Journalists at Work survey, 2018, cited in Spilsbury, 2018: 68

These impacts were found to be worse for journalists working in the newspaper sector. 77 per cent of newspaper journalists reported increased work intensity, 41 per cent felt they produced a lower quality of work, and 42 per cent reported a lower job satisfaction.

Research on the effects of newsroom cuts on the delivery of local news in the UK has found evidence of the reduced ability of journalists to cover local issues in depth (Franklin, 2011; Wahl-Jorgensen, 2018), the displacement of locally relevant journalism with non-local stories to build online audiences, and the coming together of editorial and advertising departments to monetise digital content (Jenkins & Nielsen, 2020). The problem of "churnalism" (the replace-

ment of original journalism with PR copy) has been observed for a long time in UK media research and continues to be a problem (Jackson & Moloney, 2015).

(C5) Journalists' job security

2 POINTS

IN 2011 1 POINT

Journalists are more likely than not to be in stable employment, but economic pressures, particularly at the local level, have led to recent cuts and made many jobs precarious. Journalists generally enjoy contractual protections and whistleblowing channels if pressured to breach professional ethics codes.

UK journalists are more likely to be in stable, permanent employment than engaged in temporary, part-time, or freelance work, but the latter, more precarious, positions still make up a significant part of employment in the sector and are likely to grow as economic pressures on traditional news organisations increase. Instability and precarity in employment is also worse for women, who are more likely to be in temporary or part-time employment. Labour law in the UK offers a range of employment rights and protections, and journalists have the same minimum rights as employees in any other sector. Following the Leveson Inquiry, the newspaper industry has also taken steps to ensure that journalists have a degree of protection if they refuse to engage in activity that is in breach of standards codes or the law.

In terms of protections for journalists in the UK newspaper industry, whistleblowing mechanisms and contractual protections have been put in place following the 2012 report of the Leveson Inquiry. In setting out 47 recommendations for a new self-regulatory system, the report recommended that "[a] regulatory body should establish a whistleblowing hotline for those who feel that they are being asked to do things which are contrary to the code" (Leveson Inquiry, 2012c: 1809). Although the industry's regulator IPSO was largely created in order to circumvent the Leveson recommendations, this was incorporated into IPSO's articles of association. A further recommendation of the Leveson report specified that regulated news organisations should ensure that employment contracts should include "a clause to the effect that no disciplinary action would be taken against a journalist as a result of a refusal to act in a manner which is contrary to the code of practice" (Leveson Inquiry, 2012c: 1809). This too was incorporated into the IPSO system. The independent regulator for print and online journalism, IMPRESS, includes the Leveson recommendations in its articles and regulations as a condition of its recognised status (e.g., Indicator E8 – Level of self-regulation).

Looking at employment conditions, the majority of UK journalists are in permanent employment: surveys of journalists in 2015 by the Reuters Institute and in 2018 by the NCTJ found 74 per cent of journalists across all sectors had

permanent contracts (Thurman et al., 2016: 15; Spilsbury, 2018: 31). 7 per cent of journalists surveyed in 2015 and 4 per cent in 2018 were on temporary fixed-term contracts, while the proportion working as freelancers was 17 per cent in 2015 and 12 per cent in 2018. Some caution should be maintained when interpreting these figures, however, due to different definitions of "freelance" work in different studies: for example, the UK Office of National Statistics Labour Force Survey (LFS) recorded 37 per cent of journalists as "self-employed", more than double the proportion recorded as "freelance" by the Reuters Institute in the same year (cited in Thurman et al., 2016: 15). LFS data from 2018 was also found to differ significantly from the 2018 NCTJ survey in a similar manner: it is suggested that this is due to survey sampling skewing towards mainstream journalists (Spilsbury, 2018: 29–30). Regardless of the proportion, it can be said that permanent contracts are significantly more common in UK journalism employment than temporary or freelance work.

Employment conditions in UK journalism are not equal for women and men. The *Journalists at Work* survey found that men were more likely than women to have a permanent contract (78% compared with 71%), and that men are far less likely to work part-time (15%) than women (41%). The two outcomes are related, as only one-third of part-time workers were found to have a permanent contract, compared with 79 per cent of full-time employees (Spilsbury, 2018: 28–31).

In recent years, news organisations such as the *Telegraph* and *The Guardian*, as well as the BBC, have acknowledged the need for more appropriate employment and workplace policies to account for differences in working patterns for men and women and to reduce the barriers to full-time employment (see also Indicator F8 – Rules and practices on internal gender equality).

(C6) Practice of access to information

2 POINTS

IN 2011
2 POINTS

Detailed access to information legislation is in place in the UK and open to all citizens. There are some restrictions on availability and evidence showing that certain government departments in practice tend to withhold requested information, at least initially.

The UK has had legislation underpinning the public's right to access information held by public authorities since 2000, when the Freedom of Information Act received Royal assent. It took five years for the right of access to come into force (on 1 January 2005), but since then, the UK public (and journalists) have had the right to submit Freedom of Information (FOI) requests, if certain conditions are met, to require public authorities to release any information they hold relating to the request. The Act covers central government, executive agencies, and

any public bodies they sponsor, as well as devolved administrations such as the Scottish Parliament (Scottish FOI legislation is different in some respects to the regime in England and Wales), local authorities, the National Health Service, schools, and universities, and the armed forces and police forces (Information Commissioner's Office, n.d.).

Requests can be refused if it would cost too much or take too much staff time, if the request is vexatious, or if the request repeats a previous request from the same person. However, there are also a relatively wide range of 23 absolute and qualified exemptions covering issues such as national security and personal information, whereby the public body can withhold the information that has been requested.

The legislation was not created explicitly to benefit journalists, as several government representatives clarified over the first years of operation of the FOI regime; it was intended to be of equal utility for any member of the public, regardless of their occupation (Hayes, 2009: 8). The process is relatively simple. As journalists experienced in UK FOI investigations put it:

> If a public body holds the information, and doesn't already publish it, all you need to do is put your request down in writing, and give your name and details of where to send the response… and within 20 working days they must send you their reply. (Basnett & McNamara, 2018)

In practice, however, obtaining information (from central government at least) can be time-consuming or difficult. A review of the availability of information on decision-making at FOI regimes across Europe by Access Info Europe found the UK to be one of the least likely countries to disclose information in full and one of the most likely to refuse to disclose information (Access Info, n.d.). A UK think-tank, the Institute for Government, compiled extensive data on FOI request compliance by UK government departments and found that, of 6,171 resolvable requests received by government departments in the fourth quarter of 2019, just 2,706 – under half – were granted in full, with 865 partially withheld and 2,354 withheld in full. There are significant disparities between government departments, with some departments considerably more likely to withhold information or to miss deadlines for resolving requests (Freeguard, 2020). A BBC investigation in 2017 also found persistent delays and unhelpfulness from government departments in their handling of FOI requests (Rosenbaum, 2017).

Overall, the freedom of information regime in the UK is a very useful resource for citizens and for journalists. However, the formal restrictions on access in a relatively wide variety of circumstances, and the informal intransigence of certain government departments to comply with requests from journalists, means there is a gap between the promise of freedom of information in the UK and its practice.

(C7) The watchdog and the news media's mission statement

3 POINTS
IN 2011
2 POINTS

UK broadcasters are obliged to perform certain functions fulfilling the watchdog role of journalism and devote significant resources to investigative journalism. Many newspapers specify their watchdog functions in mission statements or adhere to standards codes that emphasise the importance of the public interest in their work.

News providers in the UK are generally committed to the watchdog function of journalism, although this commitment is often implicit rather than placed at the centre of public statements about organisational goals. Broadcast news, underpinned by legislation, enacts Parliament's definitions of, and criteria for, public service broadcasting, which includes a number of specific purposes that broadcast journalism should achieve. National newspapers don't all publish mission statements defining the obligations of their journalism in holding power to account, but all adhere to one or another standards code that promotes at least some aspects of the watchdog function.

The BBC's Object, as defined in the Royal Charter and Agreement, is the fulfilment of the corporation's mission and the promotion of its public purposes. The BBC's Mission is broad: "The Mission of the BBC is to act in the public interest, serving all audiences through the provision of impartial, high-quality and distinctive output and services which inform, educate and entertain" (DCMS, 2016a: 5). The Public Purpose relating to news is then set out as follows:

> **To provide impartial news and information to help people understand and engage with the world around them:** the BBC should provide duly accurate and impartial news, current affairs and factual programming to build people's understanding of all parts of the United Kingdom and of the wider world. Its content should be provided to the highest editorial standards. It should offer a range and depth of analysis and content not widely available from other United Kingdom news providers, using the highest calibre presenters and journalists, and championing freedom of expression, so that all audiences can engage fully with major local, regional, national, United Kingdom and global issues and participate in the democratic process, at all levels, as active and informed citizens [emphasis original]. (DCMS, 2016a: 5)

The watchdog function of journalism is therefore implicit, rather than explicitly set out in the BBC's constitutional documents. The corporation's editorial guidelines go further, however, describing the BBC's editorial values as operating "in the public interest – reporting stories of significance to our audiences and holding power to account" (BBC, 2019c: 13).

The news provision of all commercial broadcasters are provided by Independent Television News, with the exception of 24-hour news channel Sky News.

All are regulated by Ofcom, which is tasked by legislation with producing a Broadcasting Code that covers all programming but has special criteria for the provision of news and current affairs. The mission statements of ITN and Sky News do not in themselves include references to watchdog journalism, though ITN lists several examples of investigative journalism in its annual report to demonstrate the value of its news programming to audiences (ITN, 2019: 9–11). Sky News defines its mission in terms of audience trust, "dar[ing] to challenge", and clarity (Sky News, 2020).

Ofcom's Broadcasting Code does not in and of itself comprise a mission statement for broadcast journalism's role in society. It transposes the aspects of the Communications Act 2003 and the Broadcasting Act 1996 where they relate to news programming and content, including on accuracy and impartiality in news programming. Ofcom is tasked with ensuring that the UK's public service broadcasters (PSBs) fulfil their duties as defined by Parliament; while there is no single definition of public service broadcasting, impartial news provision that supports democracy is agreed to be crucial to the maintenance of PSB and central to broadcast news in the UK (House of Lords, 2019). There is therefore an implicit commitment throughout UK broadcasting for the provision of news that fulfils the watchdog function on journalism.

The UK's national newspapers largely do engage in investigative journalism to varying degrees. Their mission statements differ significantly, and – perhaps reflecting the current circumstances facing journalism – place more focus on business sustainability than the watchdog function of journalism. For example, DMGT (Daily Mail and General Trust), ultimate owner of the *Daily Mail*, frames its publisher's mission statement almost entirely in financial and business terms, and describes the performance of its journalism portfolio in similar terms. A single sentence in the corporation's most recent annual report does, however, define the wider purpose of its journalism as "holding authority to account through high-quality journalism" (DMGT, 2019: 31).

News Corp UK & Ireland is the owner of three of the UK's most prominent national newspapers: the tabloid *The Sun*, and the broadsheet *The Times* and its Sunday stablemate *The Sunday Times*. *The Times* titles are renowned for their investigative journalism, particularly via *The Sunday Times* insight team. The publisher, however, does not refer directly to watchdog functions in the descriptive summaries of its news brands (News UK, n.d.).

Reach PLC publishes the most national news brands, having taken over several newspapers in 2019. Its flagship title, the *Mirror*, defines its mission as "to make sense of a rapidly changing world for our readers. To challenge wrongs where we see them. To stand up for the underdog against authority. And to entertain" (Mirror, n.d.). The *Express*, encompassing both a daily and a Sunday newspaper, outlines its purpose as follows: "Every day we endeavour to provide our readers with the very best journalism, to inform and entertain.

We are committed to reporting the news accurately, fairly and vigorously and will always hold those in authority to account" (Express, n.d.). A third Reach title, tabloid newspaper the *Daily Star*, does not include a mission statement referring to its vision or principles.

The vision statement of *The Telegraph* is centred on business sustainability – perhaps not surprising, given the current economic pressures being exerted on commercial news organisations – but also contains references to exemplars of high-profile stories based on investigative journalism. Primarily, however, *The Telegraph* defines its purpose in political and economic terms:

> *The Telegraph* is for everyone but *The Telegraph* has certain values. We are right of centre, in support of free markets and deregulation. We're in favour of enterprise. *The Telegraph* supports fair-play, the rule of law and equality of opportunity. (Telegraph, n.d.)

The Guardian is owned by the Scott Trust, set up by the family of former owner and editor C. P. Scott; the corporation cites an essay article by Scott as a guiding document in the company's mission (The Guardian, 2017a). While the essay does not explicitly define the watchdog role of the newspaper, it does describe the wider social purpose of a newspaper as a powerful force in society. More recently, the current editor of *The Guardian*, Katharine Viner, set out the values and principles for the title for the present day in another essay:

> We will give people the facts, because they want and need information they can trust, and we will stick to the facts. We will find things out, reveal new information and challenge the powerful. This is the foundation of what we do. (The Guardian, 2017b)

The Independent (and its sister title the London *Evening Standard*) does not publish a mission statement online, although its code of editorial conduct (which covers the print and broadcast outlets operated by the owner) specifies public interest exemptions under certain circumstances for reporting that meets the definition of watchdog journalism, including "detecting or exposing crime or impropriety, protecting the security of the general public and preventing people and communities from being misled by the behaviour of another individual or organisation" (Independent, 2015).

The Financial Times does not explicitly refer to the fulfilment of a watchdog function in its editorial code of practice or in its brief website commitment to upholding "the highest possible standards of ethical and professional journalism" (Financial Times, n.d.-b). Despite this, the newspaper has a reputation for high-quality journalism, including investigative reporting on large businesses and organisations. The Code of Practice itself refers to ethical and professional standards in reporting, but the inclusion of the Editors' Code of Practice as the standards code followed by *The Financial Times* (even though it is not a member

of IPSO) includes references to "the public's right to know" and includes the public interest exemptions in the IPSO Code (Financial Times, 2020).

Though not specifically part of the mission statements of newspaper publishers, all members of the press regulators IPSO and IMPRESS are obliged to comply with their respective standards codes, and most members host statements online and in print notifying audiences of their observance of standards codes. IPSO members are obliged to adhere to the Editors' Code of Practice, which allows journalists to disregard certain clauses when doing so can be demonstrated to be in the public interest. The Editors' Code defines the first clause of the public interest definition as follows:

1. The public interest includes, but is not confined to:

    i. Detecting or exposing crime, or the threat of crime, or serious impropriety.

    ii. Protecting public health or safety.

    iii. Protecting the public from being misled by an action or statement of an individual or organisation.

    iv. Disclosing a person or organisation's failure or likely failure to comply with any obligation to which they are subject.

    v. Disclosing a miscarriage of justice.

    vi. Raising or contributing to a matter of public debate, including serious cases of impropriety, unethical conduct or incompetence concerning the public.

    vii. Disclosing concealment, or likely concealment, of any of the above.

(Editors' Code of Practice Committee, 2019)

Clause One outlines the extent to which the public interest exemptions are designed to provide protections to journalists engaging in investigative journalism. The exemptions relate to code clauses on the following: privacy; harassment; children; children in sex cases; reporting of crime; clandestine devices and subterfuge; witness payments in criminal trials (excluding while proceedings are active); and payment to criminals. The Codebook accompanying the code clarifies that the public interest should be applied in such a way that it enables "investigative journalism, or exposure of serious wrongdoing" (Editors' Code of Practice Committee, 2020: 120).

The IMPRESS Standards Code, with which all members of that regulator must comply, includes in its preamble the aim of IMPRESS to "ensure that journalists behave responsibly, while protecting their role to investigate and

report freely", while the public interest exemptions listed underneath consist of the following:

(a) The revelation or discussion of matters such as serious incompetence or unethical behaviour that affects the public;

(b) Putting the record straight where an individual or organisation has misled the public on a matter of public importance;

(c) Revealing that a person or organisation may be failing to comply with any legal obligation they have;

(d) The proper administration of government;

(e) Open, fair and effective justice;

(f) Public health and safety;

(g) National security;

(h) The prevention and detection or crime; and

(i) The discussion or analysis of artistic or cultural works.

(IMPRESS, n.d.: 3)

Some of these clauses represent core aspects of the watchdog function of journalism; they are endorsed by members of IMPRESS through their membership of that regulatory system and obligations to comply with the Code.

(C8) Professional training

3 POINTS

IN 2011
3 POINTS

Professional training is generally available to UK journalists, and the majority who do undertake training are funded by their employers when doing so. Larger news organisations such as the BBC operate their own internal training schemes.

Though journalism in the UK was traditionally viewed as a trade rather than as a profession, nationwide training schemes for journalists have been in place since the 1950s, and the professionalisation of journalism has increased significantly in recent years. Almost all new journalists in the UK are educated to at least bachelor's degree level (Thurman et al., 2016), and the proportion of new entrants to the profession with journalism-specific degrees has grown substantially (Jackson et al., 2020: 107).

The National Council for the Training of Journalists has provided training for journalists in subjects such as ethics, media law, and regulation for over 70 years, and accredits journalism courses in the UK at academic institutions and

elsewhere that lead to the diploma in journalism qualification. 65 per cent of all journalists in the UK hold a qualification from the NCTJ (81% of journalists hold an accredited journalism qualification from any source) (Spilsbury, 2018: 8). According to the 2018 *Journalists at Work* survey, 70 per cent of respondents who received training in the previous year had their training funded by their employers, 18 per cent received training for free, and just 9 per cent paid for training personally. However, these proportions varied by sector, with broadcast and newspaper journalists more likely to receive employer-funded training than online or magazine journalists (Spilsbury, 2018: 56–57). The same survey found that journalists across all sectors were concerned about possible skills gaps due to the changing technological and employment context, and that attempts to address these gaps faced barriers due to time constraints and work commitments and potentially high fees. Overall, however, the majority of UK journalists (63%) felt that the volume of learning provision in the UK was "about right" (Spilsbury, 2018: 64–65).

Larger news organisations in the UK operate their own internal training schemes. The BBC Academy is an in-house training hub offering a mix of classroom-based and online training modules, with 90 per cent of staff completing one or more courses in 2018 to 2019 (BBC, 2019: 85). Some BBC Academy content is available to licence fee payers and journalists at other organisations. The corporation has also committed to the implementation of leadership development programmes to increase the proportion of women (including the "Expert Women" project) and staff from black and minority ethnic (BAME) and LGBTQ+ staff in leadership positions (BBC, 2019a: 77–81). Larger newspaper publishers also operate their own training and management programmes, such as Reach PLC (publisher of several national newspapers and over 200 local newspapers (Reach PLC, n.d.), and members of IPSO supply regulatory compliance training to staff (News Corp UK & Ireland, 2018). In the hyperlocal and community news sector, the Independent Community News Network offers training via Cardiff University's School of Journalism, Media, and Cultural Studies (an accredited NCTJ training centre), as well as access to advice on issues of media law (Independent Community News Network, n.d.).

(C9) Watchdog function and financial resources

2 POINTS

IN 2011
2 POINTS

While broadcast newsrooms continue to have significant resources to devote to investigative journalism, economic pressures are limiting the capacity of some – but not all – commercial news organisations to engage in costly investigative or international journalism.

UK journalism has a longstanding reputation of producing in-depth investigative journalism and a commitment to international and conflict journalism. Both

activities have been affected by economic pressures (in the commercial sector), particularly in the local and regional press. However, there is still a commitment to in-depth investigative journalism across the British news media.

A House of Lords Communications Committee inquiry in 2012 investigated the state of investigative journalism in the UK and the effects of economic pressures on the ability of news organisations to devote resources to journalism of that type. The report concluded that economic pressures were having a direct negative impact on the capacity of newspapers to devote resources to investigative journalism, especially at the local and regional news level, but noted:

> It is difficult to find reliable time-series data following the amount of investigative journalism in the printed press in order to be able to conduct a comprehensive analysis of whether the amount of investigative journalism has decline over the most recent decades. However, anecdotal evidence suggests that this is very much the case. (House of Lords, 2012: 19)

Unfortunately, this remains the case, given the fact that investigative journalism often does not result in the publication of stories. The UK government-commissioned report into the sustainability of local public-interest journalism found much anecdotal evidence of pressures on the delivery of investigative journalism in UK non-broadcast media, but did not produce empirical data on the decline (DCMS, 2019a: 18–21).

UK national print and online journalism continues to produce high-profile investigative journalism stories, such as *The Guardian*'s 2016 investigation into offshore tax havens in conjunction with the International Consortium of Investigative Journalists, or the *The Sunday Times* Insight team of investigative journalists which has produced a series of high-profile investigations, including on corruption in sports. International reporting, however, has been in decline in print journalism for some time. A 2010 study monitored the decline at that stage of dedicated foreign coverage in the UK national press (Moore, 2010). Although digital convergence has made some aspects of foreign reporting more affordable, there is little evidence of increased spending in that area.

While economic pressures on the local press have been profound, the sector is still capable of conducting significant investigative journalism. Local newspapers have been shortlisted for the UK's main investigative journalism award – the Paul Foot Award – in seven of the eight occasions in the last decade that the award has been made, including a reporter for independent paper the *Hackney Gazette* winning the award in 2017 (Private Eye, 2017).

There have also been new entrants since 2010, with The Bureau of Investigative Journalism launching in that year, focusing specifically on detailed investigative journalism on selected topics, such as government use of personal data and tobacco lobbying. The Bureau is not-for-profit and funded by charitable donations and grants (Bureau of Investigative Journalism, n.d.).

On investigative journalism by public service broadcasters, the House of Lords report did not identify any significant concerns about commitments to investigative reporting (House of Lords, 2012: 21), and broadcast news organisations still have significant resources to devote to investigative journalism. BBC funding across all news and current affairs programming in 2018 and 2019 was GBP 355 million, and ITN's revenue from news at the same time was GBP 89 million (e.g., Indicator E1 – Media ownership concentration national level); both news providers also offer a range of news and current affairs formats, including investigative journalism (see Indicator E3 – Diversity of news formats). This combined expenditure is significantly higher than the GBP 307 million allocated to news and current affairs programming by all public service broadcasters in 2010 (Ofcom, 2011: 10). However, some former employees of the BBC have criticised the corporation's lack of clearly defined investigative news teams, as employed in certain national newspapers (Jones, 2016).

Conclusions

The UK has seen huge changes in the ways in which news is produced, distributed, and consumed over the last decade. Although this has chiefly been driven by technological developments, it has had a profound impact across all aspects of the news media. Not least since, amongst certain UK audiences, the legacy media have seen their role as the leading distributors of news usurped by large American technology platforms including Facebook, Twitter, and Google. The decade has also seen a fundamental shift in prioritisation, particularly amongst newspaper publishers, from analogue (print and broadcast) to digital-first.

Despite the extent of technological change, the leading news media institutions in the UK in 2011 remain the leading news media institutions in 2021 and consumption of news – though it has evolved – is high if not higher than in 2011 (see also Humphreys, 2011). News media is widely accessible across the UK's nations and regions, via broadcast television, print, or online (95% of the UK has access to high-speed broadband). Patterns of news consumption have altered significantly and diverged between different generations. Young people have deserted print publications and watch much less television news, preferring to find their news online and via mobile. Older people remain reliant on television news though increasingly supplement this with information obtained online. Print circulation has halved since 2011 (though the reach of many publications has risen thanks to online access).

Most commercial news organisations are still organised hierarchically, though staff journalists have regular opportunities to participate in editorial discussions (less so contract and freelance journalists). There has been an increase in the number of women in top editorial positions, with women

editors at five national newspapers as well as directing news at the BBC and Channel 4. The traditional separation of editorial and commercial decisions appears to be breaking down at commercial news organisations, particularly with the growth of sponsored content and native advertising, though there is limited evidence of major advertisers influencing editorial policy. The BBC, though non-commercial, has found its independence partly compromised by government intervention in provision of the licence fee. Most news organisations have detailed guidelines for newsgathering. The BBC has the most extensive editorial guidance which has, as of 2017, become overseen by the statutory communications regulator, Ofcom.

The news media has made progress on gender equality, and there is more transparency than there was around pay, though there is still a considerable way to go before the UK has gender pay parity or equality in senior management positions. There is also a strong imbalance in the use of women as expert sources in media content, something that broadcasters have sought to address. Outside the BBC there is little indication of dedicated internal policies for countering mis- or disinformation. Yet, there is widespread evidence of journalistic awareness of the increased need for social media verification. Staff journalists have higher levels of access to protection from harassment – on- and offline – as well as training in how to deal with harassment, though this is less accessible to contractors or freelance workers.

The UK national press is highly concentrated – with eleven mainstream national daily newspapers and nine Sunday newspapers, all based in London. Broadcast news is produced almost entirely by three organisations – the BBC, ITN, and Sky News – with the BBC dominating in both television and radio. The local newspaper industry has become even more highly consolidated in the last decade, with five publishers responsible for 80 per cent of all titles. Beyond this, there is a growing number of small, independent online news outlets spread around the country. There is a wide range of news formats available to the public, from fixed schedule television bulletins, to hourly radio news, to "live" or rolling text-based news online. Equally, there is a broad range of minority media, some publicly funded, though most commercial or non-profit. News is affordable, with many outlets providing free access online, and all the BBC's news available for the cost of the annual licence fee (GBP 157.20 per household).

There is a modest amount of media monitoring and scrutiny. This is done sporadically by news outlets themselves, by university centres, and by civil society or campaigning organisations. There are five codes of journalism ethics in use in the UK – covering the BBC, other broadcasters, large commercial print and online news organisations, smaller independent online outlets, and members of the National Union of Journalists. All the major news organisations adhere to a code of practice, though the nature and extent of self-regulation varies. Involvement of the public in editorial or ethical decisions is patchy and

uneven. News outlets allow comments around news or opinion articles online, but few have any formal integration of the public in the news process. Some of the UK's commercial news organisations are owned or run by international organisations (such as News International, Channel 5, and the FT), though most are run nationally. Basic information about UK news organisations is available online, though more specific information – about expenditure or consumption – is more difficult to acquire.

A majority (65%) of UK journalists have a formal qualification (NCTJ), and ethics training is now widespread within the industry. The majority of journalists are employed by a news organisation, though the number of contract and freelance workers is rising. Government information can be accessed using the Freedom of Information Act (2000), though requests can be refused, a practice that appears to have become more common in the last decade. The major news organisations each make rhetorical commitments to the watchdog function of journalism, though this is not necessarily explicit in their mission statements. Similarly, many express their commitment to investigative journalism, though it is difficult to assess the resources put behind investigations, and evidence provided to parliamentary committees suggests that these resources are diminishing.

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