

Call for Evidence and Consultation response form

Please complete this form in full and return to MediaOwnershipReview@ofcom.org.uk.

Consultation title	The Future of Media Plurality in the UK: Including Ofcom's consultation on the Media Ownership Rules Review
Full name	Greg Childs
Contact phone number	07714 708986
Representing (delete as appropriate)	Organisation
Organisation name	The Children's Media Foundation
Email address	director@thechildrensmediafoundation.org

Confidentiality

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Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	None
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None
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Your response

Call for Evidence

Question	Your response
<p>We are seeking views and information on the role and impact of online intermediaries on the news consumption journey of UK consumers and the UK news media landscape.</p>	<p>We are very concerned about the lack of recognition in this consultative report of the importance of online intermediaries in the ‘news consumption journey’ for young people.</p> <p>Children and teenagers are keen to understand the world around them and are heavy users of online resources. As the Cardiff University 2009 report ‘What Do Children Want from the BBC?’ https://www.bbc.co.uk/blogs/knowledgeexchange/cardifftwo.pdf pointed out, ‘98% of the children surveyed found the news ‘interesting’. The same report revealed children are keen on ‘knowing.... what’s going on’ and learning about ‘the world’.</p> <p>Both on TV and online the current media situation serves that need badly.</p> <p>Children and young people are major consumers of news information. See Ofcom 2020: https://www.ofcom.org.uk/_data/assets/pdf_file/0027/195345/covid-19-news-consumption-children-12-15-report.pdf However, online, most of that information is provided poorly – i.e. algorithmically mediated. Alongside family, school and peers, online intermediaries are a significant source of information about the world around them, at a time when children and young people are increasingly influenced by disinformation. See Ofcom 2021: https://www.ofcom.org.uk/_data/assets/pdf_file/0025/217825/children-and-parents-media-use-and-attitudes-report-2020-21.pdf.</p> <p>Young people have a need and the right to have access to a balanced news diet.</p> <p>It is now apparent that little effort has been made by online providers to produce content that is moderated for and appeals to under 18s.</p> <p>When considering the future of media plurality, this gap in provision is a serious issue since academic and industry research has shown over more than five decades that news habits tend to form in childhood. The longer we delay engaging young people with age-appropriate news and current affairs, the less likely they are to be lifelong and discerning news consumers.</p>
<p>We are seeking views and information on whether the role and impact of online intermediaries gives rise to new media plurality concerns; and, if so, how</p>	<p>We believe that it would be a relatively simple matter for all providers of news online (including broadcasters such as ITV, Channel 5, Channel 4 News and Sky News) to develop and offer mediated news content for young people. Given the proliferation of news across many platforms through social media sharing and recommendation,</p>

the regulatory framework might be updated to mitigate such concerns.

this would have the effect of significantly increasing the coverage of accessible, regulated and balanced news for the younger audience.

Such an offering could be done through staffing within existing organisations (in relatively low numbers as much of this work would be re-versioning). Or it could be achieved through partnership with organisations already in the field such as *First News*, *The Week* or agencies which might be set up for the purpose. Or a system of an offset levy could be considered as part of the regulatory regime, allowing companies to pay for provision to be provided by other suppliers.

If there is to be a change in regulation, then consideration will need to be given to the question of how best to moderate or assess the news content produced under a new scheme.

We are seeking views and information on how the algorithms used to recommend news content to UK consumers work in determining the prominence given to different news providers.

Apart from providing more trusted content for children and young people, it's also vital that algorithms that search and recommend are set up such that they favour content from trusted sources. Not exclusively – young people must be allowed to discover more obscure and non-mainstream views as well — but algorithmic design should be pursued with trusted sources for under 18s as a prime objective. It is worth Ofcom considering this point when it comes to future regulation of internet services.

The recently adopted General Comment 25 on children's digital rights - an update to the 1989 United Nations Convention on the Rights of the Child - makes clear that the assumption should be that children are viewing content by default on all the regularly accessed online platforms and social media outlets. See:

<https://www.ohchr.org/EN/HRBodies/CRC/Pages/GCChildrensRightsRelationDigitalEnvironment.aspxn>.

The US COPPA law prevents children under 13 being identified. This has far-reaching influence on the design of social media websites used across the world, as the platforms' operators use it to assume no children are accessing their services, so child-friendly design is not applied. The AI used on all these major sites does not take them into account. It will be important in future regulatory interventions to take into account the extent to which algorithms "curate" content, and the extent to which these algorithms are not set up to respond to the needs of young people.

One form of pre-moderation is simple to apply.

Once a culture of child-centred news and information content has been established, then links to that content should always be shown on news messages from any source that children might see. This is particularly important for the under 13s who (as discussed above) are not recognised by algorithms as having specific needs.

	<p>Thus a “manual” version of recommendation should be the default position for all news content. A simple “Click here for Kids’ News” button on all news content would encourage younger user towards moderated material from trusted suppliers.</p>
<p>We are seeking views and information on whether the role and impact of algorithms on the news consumption journey of UK consumers and the UK news media landscape.</p>	<p>This question is incomplete, so no comment.</p>
<p>We are seeking views and information on whether the role and impact of algorithms gives rise to new media plurality concerns and if so, how the regulatory framework might be updated to mitigate such concerns.</p>	<p>Plurality of supply is essential for children and young people – but, crucially, content which can be trusted as reliable and trustworthy. The younger the child the more the content needs fair, honest and dependable curation. This means the algorithmic promotion of trusted news suppliers should be absolutely central to any future online regulatory regime. (See above).</p> <p>The methodology for deciding what is trusted and what is not needs further thought, but the principle should guide future regulatory planning.</p>
<p>We are seeking views and information on the role and impact of market change, outside the context of a merger, on the news consumption journey of UK consumers and the UK news media landscape.</p>	<p>For children and young people, access to curated quality news has been disrupted by the migration of an increasing number of viewers from television to online content delivery which inevitably means more young people now experience a patchwork of provision and much more partisan opinion.</p> <p>There has also been a decrease in the number of news brands oriented at young people in the traditional television space. ‘First Edition’ (Channel 4) and ‘Nick News’ ceased their television broadcasts in 2003. Sky has recently increased news and factual coverage for young people with its ‘FYI’ brand.</p> <p>Online provision for young people has increased through the online services of print-brands ‘First News’ (‘First News Live’ which is allied to the Sky programme ‘FYI’) and ‘The Week Junior’ (which offers a digital version of its magazine). The BBC’s ‘Newsround’ programme has undertaken to increase its online presence – with more stories daily – as part of its commitment to redirect resources after having been given permission to significantly reduce CBBC’s broadcast hours of live news in early 2020 from 85 to 35 hours per year.</p> <p>None of these initiatives is a solution in sufficient volume to guarantee prominence. Hence the need to tailor algorithms to favour “trusted sources” and the need to create “trusted content” from a greater range of sources – as outlined above.</p>

<p>We are seeking views and information on whether the role and impact of market change, outside the context of a merger, gives rise to new media plurality concerns, and if so, how the regulatory framework might be updated to mitigate such concerns.</p>	<p>The power of the online platforms, their lack of accountability and their tendency towards inaction where young users are concerned, poses a very real threat to young people’s ability to accurately assess the world around them, develop balanced and informed opinions and make effective decisions within society. In time, this will almost inevitably affect their development as citizens and democratic society and its processes more widely.</p> <p>If the online platforms cannot find a way to ensure greater emphasis on impartial sources of news – which has long been a regulatory issue – then government must intervene.</p>
<p>We are seeking views and information on whether there are other features of the UK news media landscape whose roles and impact on the news consumption journey of UK consumers and the UK news media landscape we should consider.</p>	<p>As above, you must consider what is available for children and young people that is age appropriate, how it is being found by the audience, and consider intervention to improve the situation.</p>
<p>We are seeking views and information on whether there are other features which give rise to new media plurality concerns and if so, how the regulatory framework might be updated to mitigate these concerns.</p>	<p>No comment.</p>

Consultation

Question	
<p>We are seeking views and supporting evidence on our recommendation that the national cross-media ownership rule should be retained in its current form.</p>	<p>Retention seems sensible at a time of media consolidation.</p>
<p>We are seeking views and supporting evidence on our recommendation that the appointed news provider rule should be retained in its current form.</p>	<p>No comment.</p>

<p>We are seeking views on our proposed scope of the term “news creator” and in particular, whether the categories that we have identified as being important to be captured within this new definition are the right ones.</p>	<p>No comment.</p>
<p>We are seeking views on our proposed modifications to the existing public interest considerations specified in section 58 of the Enterprise Act 2002 to extend these considerations to “news creators”.</p>	<p>No comment.</p>
<p>We are seeking views and supporting evidence on our recommendation that the restriction on advertising agencies holding any broadcasting licences should be removed.</p>	<p>No comment.</p>
<p>We are seeking views and supporting evidence on our recommendation that the restriction on political bodies and local authorities holding all licences should be retained in their current form.</p>	<p>No comment.</p>
<p>We are seeking views and supporting evidence on our recommendation that the restriction on the BBC, Channel 4 Corporation and S4C holding Channel 3 or Channel 5 licences should be retained in their current form.</p>	<p>No comment.</p>
<p>We are seeking views and supporting evidence on our recommendation that the general disqualification on grounds of undue influence of political bodies and local authorities should be retained, but the general disqualification on grounds of undue influence of publicly-funded bodies should be removed.</p>	<p>No comment.</p>
<p>We are seeking views and supporting evidence on our recommendation that the restrictions on analogue community radio licences should be retained.</p>	<p>No comment.</p>

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