

SBS RESPONSE TO AUSTRALIAN COMMUNICATIONS AND MEDIA AUTHORITY'S NEWS DIVERSITY MEASUREMENT FRAMEWORK 24 MARCH 2023

Key Points

- The Special Broadcasting Service (**SBS**) welcomes the opportunity to comment on the Australian Communications and Media Authority's (**ACMA**) News diversity measurement framework (**'the framework'**).
- SBS supports the underlying rationale for the development of the framework, and welcomes efforts to ensure media policy and funding decisions are based on robust and reliable data regarding industry trends and consumer needs.
- SBS's role in the news and information ecosystem is unique. SBS's focus is on reporting stories that are often overlooked by mainstream media outlets and SBS is committed to providing a platform for underrepresented voices and stories that may not receive attention elsewhere.
- SBS reaches audiences through a range of platforms, including terrestrial radio and television, apps and websites, and third-party platforms, and has a deep understanding of the diversity of media consumption preferences amongst different communities and populations.
- SBS therefore has a particular interest in ensuring that this unique role is appropriately measured and assessed by regulators and policy-makers.
- There are, however, a number of challenges in achieving accurate and meaningful measurement, particularly measurement of services provided in languages other than English and services made by and for First Nations audiences, which should be addressed as the framework is further developed.
- There are also some challenges in forming an accurate picture of consumption on services which deliver content to users based on opaque algorithmic feeds, which are also subject to change without notice.
- It will also be important that the framework is based on, and can take into account, the most up to date information available regarding the business of news production and consumer habits. This is especially the case given the size and scale of changes in these areas since the framework (and associated research) was first published in 2020.
- Further engagement and consultation with industry as the framework is developed should be considered by the ACMA.



About SBS

SBS's role and function are unique in the broader Australian market for entertainment, news and information services.

SBS's principal function is to provide multilingual and multicultural radio, television and digital media services that inform, educate and entertain all Australians, and in doing so, reflect Australia's multicultural society. SBS has been proudly serving Australia and our multicultural communities for more than 47 years. Along with our principal function, our purpose is to inspire all Australians to explore, respect and celebrate our diverse world, and in doing so, contribute to a cohesive society.

SBS's contribution to public interest journalism, and hence Australian democracy, is truly distinctive. SBS is one of Australia's most trusted broadcasters, evidenced by our commitment to independent, impartial and balanced news and current affairs. Trust is underwritten by authenticity, and in our case by our commitment to live our purpose as passionately within our organisation as we do externally as expressed through our content. SBS has rigorous editorial standards and a Code of Practice¹ in place which underpin the delivery of all of its independent and balanced news, information and current affairs services on every platform.

SBS's unique connections and experience with multicultural, multilingual and Aboriginal and Torres Strait Islander communities enable SBS to cover news and tell the stories of those communities through the perspectives and unique voices of those communities. In particular, the news, current affairs and information services provided by SBS inform and promote understanding among all Australians of different cultures and maximise opportunities for people from diverse backgrounds to engage in social, political and cultural discourse.

SBS news and current affairs

SBS offers comprehensive coverage of news and current affairs, with a uniquely inclusive SBS perspective for all Australians including multilingual, multicultural and Indigenous Australians.

The SBS News service is the main umbrella of our news and current affairs offering—available via broadcast television, SBS Audio services, SBS websites (including SBS On Demand), mobile apps, and social media, including Facebook and Twitter—with significant growth across YouTube, Instagram and TikTok platforms.

SBS World News nightly bulletins perform a distinctive role in bringing the biggest global stories to a local audience. The recently launched SBS **عربي** News and SBS **中文** television news bulletins every weeknight, produced by SBS's local bilingual journalists, offer impartial coverage, insightful context and balanced analysis of the major national and international stories, in Arabic and Mandarin. Both bulletins are available for catch-up on SBS On Demand with English subtitles added.

The recently launched SBS WorldWatch television channel is the new home of the abovementioned SBS **عربي** News and SBS **中文** News as well as major news bulletins from more than 35 countries around the world, in more than 35 languages.

Insight (available via television and online) covers the issues facing Australia through the perspective of everyday Australians who share their extraordinary experiences and different viewpoints in a respectful way.

¹ <https://www.sbs.com.au/aboutus/sbs-code-of-practice>



Dateline (available via television and online) provides compelling in-depth international stories produced by Australian crews which ensures the context is relevant for an Australian audience.

Dateline and *Insight* episodes are available on SBS On Demand with subtitles in Arabic and Simplified Chinese.²

The Feed (available online) informs and educates younger audiences across digital platforms, engaging them in the issues of the day through explainers, articles, videos and satire.

According to the latest Reuters Digital News Report, published in 2022, SBS and ABC continue to be the most trusted news media brands in Australia. Trust in the SBS brand is at 65 per cent—12 percentage points higher than commercial television networks, and 24 percentage points higher than newspapers brands included in the survey.³

SBS has rigorous editorial standards and a Code of Practice in place, which underpin the delivery of its independent, balanced and quality news and current affairs services on all its delivery platforms, including services in languages other than English. SBS is required to notify its Codes of Practice to the ACMA, which also acts as a point of escalation for broadcast complaints made.

NITV

News and current affairs programming on National Indigenous Television (**NITV**) offers a unique perspective on issues that affect Indigenous communities in Australia and around the world.

NITV News: Nula is the network's flagship news program, which airs nightly and provides coverage of local, national, and international news stories from an Indigenous perspective. The program features Indigenous reporters and presenters, and stories that are relevant to Indigenous communities.

In addition to *NITV News*, the network offers a range of current affairs programs that explore issues affecting Indigenous Australians. These programs include *The Point*, a weekly panel discussion program that covers news and current affairs topics relevant to Indigenous communities, and *Living Black*, a series that explores a range of issues affecting Indigenous Australians, from health and education to cultural heritage and identity.

SBS Audio

SBS's seven linear terrestrial radio stations deliver accurate and balanced news, current affairs, and information as well as sport, music, and entertainment in more than 60 languages. SBS Audio services also provide content via the easy-to-access and 'always on' SBS Audio App and online—through articles, catch-up radio programs, podcasts, and video.

SBS Audio also helps connect diverse community members (including those in their homelands), through its active presence on social media platforms.

The importance of SBS's audio services was highlighted during the COVID-19 pandemic, when a large number of Australians used social media to access news and information, as well as connect with people in their lives, including during lockdown periods. Most of SBS's more than 60 language services are available on social media, ensuring that communities have options to interact with, and benefit from, SBS services,

² Subtitling is provided for SBS commissioned or produced episodes of *Dateline*

³ https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2022-06/Digital_News-Report_2022.pdf p 131



The News Measurement Framework

SBS is broadly supportive of the intent behind the News Measurement Framework.

Providing Australians with accurate and impartial information contributes to a successful functioning of democracy and it is therefore vital that we understand the ongoing health of news production and the shape of consumption in Australia.

In particular, there is a need for reliable and accurate data to ensure policy and funding decisions are made on the basis of a sound body of evidence. This is especially the case when funding decisions are made in relation to support for news services which might not otherwise be able to be commercially sustained. It is vitally important to understand any deficiencies in the provision of such services, and which platforms and providers would be best placed to deliver additional services and ensure they reach the intended audience.

The framework could also serve as a means of ensuring regulators, policy decision-makers and industry participants have a holistic understanding of news media consumption.

However, as explored during the recent roundtable workshop held in conjunction with this consultation, there are a range of challenges and concerns regarding the proposed framework, which will need to be addressed should the framework be implemented by the ACMA.

Underlying information base

SBS notes that the News Measurement Framework was developed with reference to a range of research studies and findings, including reviews of literature and research, qualitative research and international comparisons.

These studies were published in December 2020, and it may be appropriate for the findings to be revisited and reconsidered in light of more contemporary developments in news production and consumption. As noted in the Discussion Paper, there are a range of new sources of research and data which will be relevant, particularly the Public Interest Journalism Initiative (PIJI) measurement projects.

As an example of contemporary developments, since the publication of the research, the News Media and Digital Platforms Bargaining Code has come into effect, bringing with it an estimated additional \$200 million in revenue from voluntary deals.⁴ As an example, the ABC has announced it will be investing money derived from voluntary deals with the platforms to employ an additional 50 regional journalists across more than 20 'news desert' locations.⁵

Further, news avoidance appears to be a strengthening trend, with 46 per cent of people surveyed in a recent Reuters study now avoiding the news, which is up from 24 per cent in 2017.⁶

Recent inflationary spikes, skills shortages and cost of living concerns will also impact on newsroom sustainability and consumption behaviour.

Measurement challenges

From a practical perspective, SBS would like to note potential difficulties for a model seeking to measure the impact and importance of the multilingual and First Nations news services provided by SBS and the multilingual media sector more broadly. For example, the SBS

⁴ <https://www.afr.com/companies/media-and-marketing/nine-warns-tech-giants-reluctant-to-re-sign-media-publishing-deals-20230228-p5coam>

⁵ <https://www.abc.net.au/news/2021-12-03/abc-to-add-more-than-50-journalists-in-regional-australia/100673862>

⁶ <https://www.responsesource.com/blog/journalism-trends-for-2023-analysis-from-the-reuters-institute-digital-news-report/>



WorldWatch service carries news bulletins from across the world in over 30 languages. It may be difficult for the regulator to assess the number of sources, or the viewpoint diversity of these bulletins, given they are in languages other than English (and English subtitles are not able to be provided).

Similarly, SBS Audio provides programming in over 60 languages. Both of these services are of high impact and value to multilingual communities in Australia and contribute to the overall diversity of news and information in Australia. This is a logistical challenge for any measurement of news diversity in Australia. A model which is unable to measure and assess this impact would be incomplete.

Similarly, these services present a question in relation to measurement of consumption. Simple metrics measuring total audiences may give a misleading picture of the value and importance of services in languages other than English, or services made by and for Aboriginal and Torres Strait Islander peoples. The challenges of measuring the size of audiences for SBS WorldWatch provide a good example.

SBS WorldWatch is unlike any other channel measured by OzTAM. It is a multilingual news channel, meaning viewers will tune in to watch their preferred language bulletin then drop off—this impacts the share of audience figures as measured by OzTAM. Because of this 100% churn rate, the format of the channel does not lend itself to building an audience over the course of an evening like a generalised entertainment channel. Rather, a smaller number of loyal viewers will tune in to watch their language bulletin and then dip out. It is also not clear whether the OzTAM sample cohort is reflective of the diversity of the Australian population, noting for example that there are no measurement boxes in the Northern Territory

Consumption may need to be considered according to a variety of metrics. In the case of SBS WorldWatch, a different approach to consumption analysis reveals the true contribution of these services. Out of the 36 different language news services provided on SBS WorldWatch, news services from 16 languages reached enough audience members to cater for more than 70 per cent of that particular language speaking population (5 min reach) and 20 of the 36 news language services reached enough audience members to cover 50 per cent of that language speaking population (5 min reach).⁷ This demonstrates that for measuring the impact of these news services it is very important to consider the addressable audience, which can be orders of magnitude smaller than the broader audience of Australians who speak English as a first language. Similar challenges are also present as regards LOTE radio services.

There are also challenges in measuring consumption of news and information on algorithm-driven social media services. It is relatively straightforward to assess what stories and pieces news organisations publish, but it is more complicated to get an accurate picture of consumption when the stream of stories pushed to users is dependent on highly individualised, opaque algorithms that are subject to change without notice. This will be a particular challenge in terms of measuring consumption amongst younger cohorts and some multilingual audiences, for whom social media is one of the primary means through which they engage with news content.

A contemporary challenge for news organisations is the evolving way in which younger audiences interact with news content. They are less likely to seek out news on legacy platforms (print, broadcast and news media organisations' online properties), and are more likely to interact with the news that 'finds' them through the algorithmically presented content

⁷ Source: OzTAM, Period: 23/05/2022 – 31/12/2022.



on social media services and apps. This requires news organisations to produce a story separately for consumption on several different social platforms (for example, Facebook, Instagram, Twitter, WeChat, TikTok). This is a challenge for a public interest media organisation such as SBS, as our objectives are to ensure our trusted sources are a part of these users' media 'diet', notwithstanding these changes in consumption habits. However, this will also be a challenge in the measurement of news diversity.

Consumption of 'non news' sources

There is also merit in considering the extent to which audiences consume news and information from 'non news' sources. This is particularly the case when considering news consumption on a platform such as Facebook, which has previously announced it is reducing the prominence of professional sources of news and information in the newsfeeds of its users.⁸ Any picture of consumption derived from a news diversity measurement tool should include an understanding of the ways in which consumption of news and information is changing, and consumption of alternative sources (non 'professional' sources) is an important part of that.

This is not to suggest that non 'professional' sources⁹ should count positively towards a measure of news diversity, but rather that a comprehensive picture of the consumption habits of Australian consumers will assist in informed decision-making and analysis, including in relation to the proliferation of mis- or disinformation on these platforms.

Further potential measurement factors

As well as a quantitative measure of sources of news, consideration should be given to measuring/tracking further information about those sources which may impact on the services they offer, such as:

- Business model/sources of revenue
- Whether those sources adhere to recognised codes and standards for impartiality and independence
- The ownership structure of those sources (for example, are they part of a broader corporate entity with cross-industry holdings which might impact on reporting)
- The country of origin of the source or its ownership entity

Not only would this information assist policy decision makers in assessing the state of media diversity across Australia, but it would also be of use to consumers to better understand and contextualise the news they access.

Other practical considerations

SBS also notes the need to balance the imperative to derive accurate and reliable data with the need to avoid additional and onerous reporting and information requirements on industry participants, an issue raised by a number of publishers at the recent industry roundtable.

Conclusion

There is sufficient need for and merit in the proposed framework to justify further work being undertaken to refine and enhance the proposal, taking into account the challenges identified in this submission and in consultation workshops undertaken with industry.

⁸ https://www.cir.org/the_media_today/will-facebook-changes-leave-news-media-out-in-the-cold.php

⁹ Work undertaken to understand the scope of 'professional' news in the context of the News Media Bargaining Code may be a useful reference



SBS would welcome further consultation and engagement between the ACMA and industry participants, should the ACMA decide to move forward with the framework.