Submission to the Australian Communications & Media Authority

A new framework for measuring media diversity in Australia

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News & Media Research Centre

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THE SCOPE OF THE SUBMISSION

In this submission we are responding to *A new framework for measuring media diversity in Australia Consultation paper*. We are seeking to address the feasibility of the proposed framework in ACMA's *News in Australia: diversity and localism* paper and provide data and insights responding to the 13 questions in the consultation paper.

EXECUTIVE SUMMARY

The News and Media Research Centre (N&MRC) at the University of Canberra advances public understanding of the changing news media landscape. The Centre publishes independent reports based on surveys, qualitative and content analyses of news media markets and news consumption. Since 2015, the N&MRC has produced the *Digital News Report: Australia*, a national annual online survey of more than 2,000 adult Australians that monitors changes in consumption, as part of a global study of 46 news markets by the Reuters Institute for the Study of Journalism at the University of Oxford. We also conduct original research into regional news audiences and journalists, diversity in news and newsrooms, and media industry studies.

In this submission, **we first provide recommendations to improve and expand the proposed measurement framework**. Then we provide **responses to each of the 13 questions in the consultation paper**. We note that some of the content in the two sections overlap.

While we believe the development of a measurement framework is a significant step forward in contributing to the evidence-base that will inform ACMA and policymakers to develop media policies that reflect the rapidly changing media ecosystem, the N&MRC would like to see the creation of a more adaptable and inclusive instrument that remains fit for purpose into the future.

Ensuring a diversity of viewpoints in news across Australia is a fundamental policy imperative that remains applicable in an age of digital information overabundance. It is a longstanding priority of the Australian media regulatory framework. However, changes in the media environment mean the ways to address this issue must change over time. We believe that it is important to develop an adaptable measurement framework. Therefore, in this submission, we aim to assess the proposed framework with longer-term sustainability in mind. We also position the public – news audiences – at the centre and examine the framework through an audience-centred lens.

From this perspective, we recommend the following modifications to the framework and measurements with regards to the scope, definitions, terminology and measurement:

Scope
- Clarify the intention of the framework and ACMA's role in gathering and using the data.
- Broaden the concept of diversity to be inclusive of all audiences, especially those who are from culturally and linguistically diverse communities.
- Expand the scope of the framework to diversity in national, state and local news rather than focusing on local/regional areas.

- Conduct a gap analysis of existing news providers who service diverse audiences.

Definitions

- Consider revising the definition of 'news' to capture the ongoing changing nature of the news ecosystem and reflect what audiences consume and prefer.
- Revise the definition of 'news organisation' to be consistent with related media policy.
- Revise the definition of 'journalist' to reflect the changing nature of the profession.

Terminology

- Rename the framework the *Pluralism and Diversity* framework to accurately reflect the aim of the measurement tool.
- Replace the generic term 'source' with specific terms such as 'news brand', 'media company', 'story', 'interviewee', etc to avoid confusion.
- Replace 'public interest journalism' with 'civic journalism'.
- Refine the definition of local to reflect the goal of diversity and use the term 'generated locally'.

Measurement framework

- Apply consistency between framework elements and the proposed measurements.
  - Supply:
    - Ensure the news sources measurement includes location, frequency of reporting, pricing strategy and target audiences.
    - Include demographic information and types of news organisation in the journalist data.
    - Include news companies' revenue data to assess concentration in the market.
    - Include a diverse range of professional news providers (i.e., ethnic media) as well as emerging news providers (i.e., communities of interest).
  - Content:
    - In addition to measuring hard vs. soft news, measure a range of content formats, differentiating sponsored or branded news content from other types of news content.
    - Include viewpoint diversity in the content diversity measurement.
  - Consumption:
    - Include emerging platforms and alternative sources of news when measuring consumption diversity.
    - Collect data on audiences' preference as well as their consumption behaviour, to identify gaps in news provision.

Each of these recommendations is expanded upon in the following sections.

RECOMMENDATIONS

It has been demonstrated empirically that an increased number of outlets or channels does not automatically lead to greater diversity in content provision or in consumption. And an increase in available programming choices does not necessarily create access to a more diverse range of ideas[1].

Digital platforms have increased the volume of news that is available to audiences, and mobile devices have enabled real-time access to a variety of information online. However, news consumption in Australia has declined over time. Australians are concerned about the amount of misinformation that is circulated online and there is an increase in those who actively avoid news[2]. The overabundance of information does not necessarily mean audiences have access to quality information that is relevant to their lives. In fact, there is an increasing news access gap, particularly in regional areas, due to ongoing job losses, closures, contractions, and suspensions of local news media outlets. The Public Interest Journalism Initiative estimates that more than 200 local newspapers have either closed or been suspended since 2019[3]. This gap in local news has prompted audiences to rely on social media – including hyperlocal community pages - or online platforms for news[4].

There is a need to regularly assess whether audiences are getting sufficient choice to access high quality, and relevant news within their news repertoire. In a personalised news environment, this may be difficult to achieve and will need a practical and sustainable solution.

ACMA's proposal in '*A new framework for measuring media diversity in Australia Consultation*' paper expands the diversity narrative from ownership diversity to diversity in media infrastructure, content and audience engagement. We agree that, to assess the impact of change in the industry, a holistic view of the contemporary news market, including online and offline sources, is needed. To achieve this, we propose the following recommendations around scope, definitions and terminology. Following this section, we provide detailed feedback on the 13 questions asked in the consultation paper.

Scope

Australia's news media is one of the most concentrated in the world[5]. A 2021 report found that News Corp (59%) and Nine Entertainment (23%) owned more than 80% of the metropolitan and national print media markets[6]. The top 4 media companies control 95% of revenue among daily newspapers, over 75% of total revenue in free-to-air television, and almost 70% of revenue in the radio broadcasting sector[7].

In a highly concentrated ownership structure, ensuring plurality of ownership is difficult and must be a top priority. However, the concept of diversity in the context of the news media is much broader than considerations of

[1] Jacklin, P. (1978). Representative diversity. *Journal of Communication*, 1, 85–88.; Park, S. (2005). Competition's Effects on Programming Diversity of Different Program Types. *International Journal on Media Management, 7*(1-2), 39-54. doi:10.1080/14241277.2005.9669415

[2] Park, S., McGuinness, K., Fisher, C., Lee, J., K., McCallum, K. & Nolan, D. (2022). *Digital News Report: Australia 2022.* Canberra: News & Media Research Centre. https://doi.org/10.25916/1xkk-jb37

[3] https://piji.com.au/category/australian-newsroom-mapping-project/

[4] Park, S., Fisher, C. & Lee, J. (2020). *Local News Consumers.* Canberra: News & Media Research Centre. https://www.canberra.edu.au/research/faculty-research-centres/nmrc/research/local-news-consumers

[5] The Senate Environment and Communications References Committee. (2021). *Media diversity in Australia.* Commonwealth of Australia. https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/Mediadiversity/Report.

[6] Brevini, B. & Ward, M. (2021). *Who controls our Media.* GetUp! https://d68ej2dhhub09.cloudfront.net/2810-GetUp_-_Who_Controls_Our_Media_.pdf.

[7] Stanford, J. (2021). *The Future of Work in Journalism.* Australia Institute. https://australiainstitute.org.au/wp-content/uploads/2021/11/Future-of-Journalism-WEB.pdf

pluralism in ownership. From the perspective of the audience, it must reflect what audiences consume and what they prefer.

The report from Media Diversity Australia[8] found that 78% of presenters, commentators and reporters in the news have an Anglo-Celtic background and concluded that news in Australia is far from reflective of the diversity in the community. This continues a long line of studies that show Australian newsrooms tend to be dominated by Anglo-Saxon, middle-class, Christian males[9]. Among Australian news audiences[10], there are certain groups that feel underrepresented - women, younger Australians, low socio-economic and regional Australians - including which voices are heard in news coverage and what topics are covered. A recent study by the News & Media Research Centre found only around half (54%) of Australians say that news organisations are doing a good job of giving voice to the underrepresented and 38% say they are doing a bad job at this[11].

There are marginalised groups in the population that are not adequately and fairly represented in the media. These marginalise groups are typically found in **gender, sexual identity, ability, race & ethnicity, Indigeneity, national origin, religion, language, age, class (SES), or geography**. Therefore, ACMA's news measurement framework will need to have an inclusive scope of diversity. The framework can be an overarching tool applicable to different diversity contexts. These categories of diversity should be applied in measuring the infrastructure, content and consumption diversity of news. For example, is there sufficient representation of different ethnicities in the production of news (i.e., journalists)? Are all age groups adequately served with news content relevant to their interests? Are those who live in the regions accessing diverse content as much as those in the city? These are the questions that the measurement framework should be able to answer.

Napoli's model is very useful for identifying key dimensions of media diversity across the supply chain[12] by conceptually mapping the ownership (source), content, and consumption (exposure) in a linear manner. However, this model rests heavily on the pre-digital broadcast medium. It is a supply model, rather than an audience-focused model. There are other models that we can draw from. For example, Wildman and Owen explain diversity as having three dimensions: access diversity, content diversity, and diversity of ideas[13]. Access diversity refers to the idea that, because media have a gatekeeper function in society, they must provide fair access. Content diversity is the diversity in the programs that the media provides. Idea diversity means that the media should provide a wide array of ideas and criticism without exhibiting a bias toward one viewpoint. Moreau and Peltier[14] use the terms variety, balance, and disparity to denote three similar aspects of diversity.

Recommendation
1. Broaden and clarify the concept of diversity to be inclusive of all audiences.

[8] Groutsis, D., Martin, L., Lattouf, A., Soutphommasane, T., Lumby, C., Young, N., Crawford, J. and Robertson, A. (2022). *Who Gets to Tell Australian Stories? 2.0.* Sydney, NSW: Media Diversity Australia. https://apo.org.au/node/320836

[9] Forde, S. (2005). The changing face of Australian newsroom: cultural and ethnic diversity among Sydney journalists. *Australian Journalism Review, 27*(2), 119-134; North, L. (2009). *The gendered newsroom: how journalists experience the changing world of media.* Hampton Press.

[10] Park, S., Fisher, C., McGuinness, K., Lee, J., K. & McCallum, K. (2021). *Digital News Report: Australia 2021.* Canberra: News & Media Research Centre. https://apo.org.au/node/312650

[11] McGuinness, K., Park, S., Lee, J. Y., Fulton, J. and Lukamto, W. (2023). *Valuing Diversity in News and Newsrooms.* Canberra: News & Media Research Centre, University of Canberra. https://doi.org/10.25916/vwb0-6p96

[12] Napoli, P., 'Deconstructing the diversity principle', *Journal of Communication*, 49(4), 1999, pp. 7–34.

[13] Wildman, S. S., &Owen, B. (1985). Program competition, diversity and multichannel bundling in the new video industry. In E. M. Noam (Ed.), *Video media competition: Regulation, economics and technology* (pp. 244–279). New York: Columbia University Press.

[14] Moreau, F., & Peltier, S. (2004). Cultural diversity in the movie industry: A cross-national study. *Journal of Media Economics, 17,* 123–143.

Another aspect to consider is what the diversity goal is trying to achieve. Diversity comprises of two dimensions - open and reflective diversity. The former signifies the provision of programs that address a wide range of ideas within society, however minor. The latter signifies the provision of programs that match consumer demand[15]. The framework needs to take a position on which diversity dimension will be prioritised.

There is also inconsistency of focus between the broad remit of 'media diversity in Australia' outlined in the consultation paper and narrower focus on 'news diversity and localism' in the measurement framework. This generates uncertainty about the goal of the framework.

The aim of the framework needs to be clear from the outset so that the scope and measurements can be developed effectively to suit the purpose.

Recommendation
2. Clarify the intention of the framework and ACMA's role in gathering and using the data.

Most audiences access a wide range of news, from hyperlocal news and information to international news. It is important to fully capture diversity across a range of news that audiences access. While there are few studies that examine diversity perceptions within the context of local or international news, there are existing studies that show Australians do not feel that national news adequately or fairly represents various groups in the population.

According to the *Digital News Report: Australia 2021*[16], about 60% of Australians say their gender receives the right amount of coverage, but only half say their political views do (51%). More than half say the place they live in receives about the right amount of news coverage (55%) and there is the right amount of coverage of their social and economic class (55%). Only 54% think there is enough coverage of their ethnic groups. In terms of fairness of coverage, only 45% agree their political views are fairly represented in the news.

A recent study of Australian journalists' perception[17] of diversity in national news indicates that it needs to be improved. The study asked journalists to nominate the one thing the news industry is doing best and 42% agreed the industry is doing well at getting the news out. However, only 3% chose 'diversity' as what they do the best. When asked what the industry was doing the worst, around one in five said it is doing the worst job in diversity (19%). These studies indicate a clear gap in the provision of national news with regards to representation of all audiences.

Diversity measures will need to include all levels of news provision and consumption – local, state and national.

Recommendation
3. Expand the scope of the framework to diversity in national, state and local news rather than focusing on local/regional areas.

[15] Van der Wurff, R., & Van Cuilenburg, J. (2001). Impact of moderate and ruinous competition on diversity: The Dutch television market. *Journal of Media Economics, 14*, 213–229.
[16] Park, S., Fisher, C., McGuinness, K., Lee, J. Y. and McCallum, K. (2021). *Digital News Report: Australia 2021.* Canberra: News & Media Research Centre, University of Canberra.
[17] McGuinness, K., Park, S., Lee, J. Y., Fulton, J. and Lukamto, W. (2023). *Valuing Diversity in News and Newsrooms.* Canberra: News & Media Research Centre, University of Canberra.

Definitions

Definition of news

We understand the practicality of only including professionally produced news when applying the diversity measures. However, restricting the scope of news to 'professional' sources is problematic in the longer term. Excluding sources of participatory journalism like personal blogs and community-run forums, as well as news from advocacy groups, may distort our understanding of the overall news ecosystem. While traditional news brands still command larger audiences, consumer research shows that audiences are turning away from mainstream media[18]. Sections of news audiences are depending on these alternative sources for news and will increasingly continue to do so. It is important to incorporate audiences' perceptions of what constitutes news and which sources they rely on.

Preliminary analysis of 60 qualitative interviews[19] with Australian adults reveal broad definitions of news among audiences. When asked how they would define news, some describe it as information provided by mainstream news outlets, but others include blogs, social media pages for community news, podcasts, influencers, government websites and politician's social media accounts. According to the *Digital News Report: Australia 2022,* about 9% of Australian adults do not use any source other than social media to get news. Audiences' news consumption behaviour is shifting away from traditional forms of news sources and platforms.

We recommend ACMA adopt a wider definition of news beyond that which is 'professionally' produced. If this does not happen from the outset, the framework risks being limited to measuring a conception of news that is out of step with the rapidly changing information environment, and the experience and perceptions of Australian audiences.

The definition also needs to align with other media policy. For example, according to the *Treasury Laws Amendment (News Media and Digital Platforms Mandatory Bargaining Code) Act 2021*, news is defined as content that "reports, investigates or explains: (a) issues or events that are relevant in engaging Australians in public debate and in informing democratic decision making; or (b) current issues or events of public significance for Australians at a local, regional or national level" (p.3). This definition captures emerging types of news content, which will fit the purpose of the news measurement framework.

If applying a broader definition proves too complex, then a dual approach could be taken. ACMA could adopt the narrow 'professional' definition of news for mapping the supply side of news and embrace a wider perspective when measuring audience consumption. This would highlight any differences and guide changes to the supply definition in the future.

Recommendation
4. Consider revising the definition of news to capture the changing nature of the news ecosystem.

Definition of news organisations

The definition of news organisation/business used here appears to be different to the criteria used for the News Media Bargaining Code (NMBC) Register. It would be useful going forward to align these definitions, in the event

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[18] *Digital News Report: Australia 2015-2022.*
[19] Australian Research Council Discovery Project DP210100157 'The Rise of Mistrust' https://www.canberra.edu.au/research/faculty-research-centres/nmrc/major-projects/the-rise-of-mistrust

of designation under the NMBC. The *Treasury Laws Amendment (News Media and Digital Platforms Mandatory Bargaining Code) Act 2021*[20] includes three components in the definition of 'news businesses'; content, Australian audience, and professional standards. While the eligibility criteria may need to be adjusted[21], at this stage, it is important to have consistency with other media policy.

The scope of the news market in the framework needs to be broadened to incorporate existing and emerging news providers that are not currently included.

Inclusion of existing diverse professional news providers: There are many news media established and serviced by multicultural communities, often with hyperlocal content but also providing national and international news. They exist in print, audio, video and online form, and are used widely by migrant communities. However, to date, Australia does not have a database or list of these professionally produced ethnic news services. A gap analysis needs be conducted of news providers who service diverse audiences.

Inclusion of emerging news providers: Outside of professionally produced news and news organisations, there are emerging areas of news provision, such as communities of interest (i.e,. Indigenous X, Croakey), social media groups and other community news providers in various forms (i.e., newspapers, websites, social media platforms, podcasts).

Recommendations
5. Revise the definition of news organisation to be consistent across media policy.   6. Conduct a gap analysis of existing news providers who service diverse audiences.

Definition of journalists

In its measurement of journalists, the framework only includes journalists who are hired by media companies that produce professional news. The news industry is rapidly shifting with an increase in non-traditional part-time and freelance journalists who provide news but are not captured in the Australian Bureau of Statistics (ABS) employment data.

According to the Census data, while the overall number of those classified as 'Journalists and Other Writers' has shrunk between 2011–2021, it has grown considerably in the categories that are not yet defined. A similar pattern was found in an earlier analysis of ABS Census[22]. This suggests a growth in employment opportunities for those with journalistic skills in journalism 'adjacent' roles, rather than in the traditional reporting and editorial positions.

According to Census 2021, there are 13,112 journalists in Australia. Of these, 32% are newspaper or periodical editors, 21% are print journalists, 13% TV and 4% radio. More than one third of journalists (36%) are categorised as either journalists 'not further defined' or 'not elsewhere classified'.

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[20] https://www.accc.gov.au/system/files/Final%20legislation%20as%20passed%20by%20both%20houses.pdf
[21] N&MRC's submission to the *Review of the News Media and Digital Platforms Mandatory Bargaining Code* can be downloaded from The Treasury website: https://treasury.gov.au/consultation/c2022-264356
[22] Josephi, B., & Richards, I. (2012). The Australian journalist in the 21st century. In D. H. Weaver & L. Willnat (Eds.), *The global journalist in the 21st century* (pp. 115–125). Routledge.; O'Regan, T., & Young, C. (2019). Journalism by numbers: trajectories of growth and decline of journalists in the Australian census 1961–2016. *Media International Australia*, *172*(1), 13-32.

Since 2011, there was an overall decline in the number of journalists by 16 percentage points. However, the number of 'journalists not further defined' and 'not elsewhere classified' increased by 110% and 31% respectively. These journalists, as well as emerging adjacent roles, need to be captured accurately in ACMA's data collection.

This is supported by a study of job advertisements in Australia which revealed a growing demand for journalistic skills, particularly writing, across a range of 'non-traditional' journalism fields[23]. Recent studies indicate the rapidly changing nature of the profession, where journalism careers are characterised by professional activities outside of traditional newsroom work[24].

We recommend the definition of journalist be expanded in the framework to adequately capture these changes that are occurring in the news industry. We also recommend the ACMA works with other stakeholders including academics to lobby the ABS to reflect these changes in the Australian and New Zealand Standard Classification of Occupations to assist policy decision making.

A useful starting point might be the work being conducted by Professor Peter Greste who recommends the definition be focussed on the process of journalism[25]. According to Greste, journalism means:

a. the practice of investigating, collecting, verifying and/or preparing, or editing, for dissemination of information, commentary, opinion, or analysis, including but not limited to news or current affairs.
b. for the purpose of making that information, commentary, opinion, or analysis available to the public, or a section of the public.
c. in respect of which a relevant person or persons abides by a journalists' code of practice, or the organisation for which they work is governed by, or submits to, a journalists' code of practice.

Recommendation
7.   Revise the definition of journalists to reflect the changing profession.

Definition of content

The definition of news content needs to include new forms of content that are emerging due to the affordances of digital platforms and the changing nature of news businesses.

Hard vs soft news: There is no perfect way of trying to distinguish one genre of news from another. If the aim is to measure the quality of the news diet of Australians and how much civic Journalism they are consuming, then hard versus soft is too blunt a distinction.

So-called 'soft' news can also be civic journalism in the public interest. For instance, a profile on the local mayor, or a podcast interview with a local concerned parent about the school, or an opinion piece by a local community leader, can all provide civically important information that citizens engage with. These are examples of civically informative journalism that don't fall into the category of hard news or the strict category of Public Interest

[23] Dawson, N., Molitorisz, S., Rizoiu, M. A. et al. (2021). Layoffs, inequity and COVID-19: A longitudinal study of the journalism jobs crisis in Australia from 2012 to 2020. *Journalism, 1*–19. doi: 1464884921996286.
[24] Zion, L., Marjoribanks, T., & O'Donnell, P. Who is a journalist now? Recognising atypical journalism work in the digital media economy. *Media International Australia,* doi:10.1177/1329878x221134207
[25] Greste, P. (2021). *Define journalism, not journalists.* Press Freedom Policy Papers. https://law.uq.edu.au/files/79899/define-journalism.pdf

Journalism. Any analysis of the content offered to audiences at the local, state or national level needs to be guided by the *topic*, not purely by the *genre*.

Advertising camouflaged as journalism: Importantly, we recommend any content analysis also include advertorial, 'sponsored content' and 'partner content'. These types of content are important ways to generate revenue[26]. There are significant issues around adequate signposting and declaration of this type of content for audiences. This is an important trend to track and an area for possible future regulation.

Recommendations
8. Revise the definition of content type (hard vs. soft news) to reflect that civically important journalism can be delivered in a diverse range of genres and formats.   9. Include sponsored content and partner content in any content analysis to reflect the growing importance of these content types as form of revenue.

Terminology

Diversity vs pluralism

The term pluralism is commonly used in media policy to refer to media ownership. The term diversity has a much broader application, particularly in the context of contemporary policy and social conversations. It seems the framework is trying to measure both plurality of ownership and diversity of content and representation of perspectives. We recommend the framework to be renamed to reflect the breadth of the endeavour.

Recommendation
10. Rename the framework the *Pluralism and Diversity Framework* to accurately reflect the aim of the measurement tool.

Clarification of key concepts

The framework is conceptually useful as it separates infrastructure, content and consumption. However, in operationalising and measuring each dimension, we need a precise and consistent terminology. Some of the key concepts need clarification and reconsideration.

- **Source:** Source is a vague term and can be interpreted differently by different readers. It is used in the framework to refer to news outlets, brands, and stories. This is confusing. We suggest that the framework uses specific terms to separate 'news brands' (i.e., Sydney Morning Herald) from 'media companies' (i.e., Nine Entertainment), 'stories', 'interviewees', etc.
- **Local:** The term 'local' is not clear. We recommend local be defined as 'generated locally'[27] to delineate journalism commissioned by local new organisations about the local community, as opposed to stories

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[26] The Canadian Association of Journalists. (2015). *Sponsored Content: How Should Journalism Ethics Respond to Advertising Dressed Up as Journalism?* A discussion paper from the Ethics Advisory Committee of The Canadian Association of Journalists. https://caj.ca/wp-content/uploads/caj_ethics_advisory_commitee_sponsored_content_discussion_paper.pdf

[27] McCallum, K., Waller, L. & Myers, A. *(forthcoming).* Reckoning, Revelation and & Recovery: Bearing Witness Proximally in Local Journalism, *Journalism Studies.*

about a local area being produced by national and international news outlets. This would adequately address the localism outlined in the framework.

Recommendations
11. Apply consistency between framework elements and the proposed measurements. 12. Replace the generic term 'source' with specific terms such as 'news brand', 'media company', 'story' or 'interviewee' to avoid confusion 13. Refine the definition of local. We recommend local be defined as 'generated locally'.

Public interest journalism vs civic journalism

Public Interest Journalism has been defined by the ACCC as "journalism that performs a critical role in the effective functioning of democracy at all levels of government and society."[28] This includes 10 categories of news coverage.

We argue, this definition is too narrow to measure 'civically' important journalism which can be highly informative but falls outside of reporting on these institutions.

Recommendation
14. Replace 'public interest journalism' with 'civic journalism'.

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[28] ACCC (2019). *Digital Platforms Inquiry - Final Report*, p. 19, p.552..

RESPONSES TO QUESTIONS

The ACMA's news measurement framework was designed as a tool to help assess whether the public policy objectives of media diversity and localism were being met. In this section, we respond to each question with evidence-base wherever possible. We have grouped questions where there is an overlap in our response.

Scope of the news measurement framework

1. Do you consider the framework, as outlined in the paper, would be an effective tool in measuring and tracking levels of media diversity in Australia?

4. Do you agree with the proposed key measures of diversity and localism?

5. Would you recommend any additions or changes to the proposed framework and/or its underlying key indicators?

The framework will be a valuable tool to measure and track news diversity in Australia. We raise a few issues and suggest ways the framework could be modified.

Overall, within each of the three dimensions, expanded definitions and measurements need to be developed.

- Expand the measurement framework to include national not just local.
- Content analysis needs to include viewpoint diversity. Rather than counting the number of sources, it is important to measure how many *different viewpoints* are reflected in news stories.
- News sources from national, state and local media need to be consistently considered.
- Culturally and linguistically diverse media outlets need to be included.

The structure of the framework rests on scholarly research on diversity that assumes a unidirectional relationship between supply, content and consumption. If this top-down approach is ACMA's preferred model, then we recommend the elements of the Framework be re-ordered to adequately reflect this. We suggest that the infrastructure section should be modified in the following order: *number of owners - availability of sources - availability of journalists.*

Recommendations regarding amendments to each aspect of the framework are summarised below:

News infrastructure

1. Availability of sources

In the framing question, the use of the term 'sources' seems inadequate here. Instead of 'source' we propose the use of 'news brands'.

Count of all professional **news brands** operating in Australia is a useful exercise but in addition to measuring the media platform, the ACMA should collect other characteristics of news brands including (1) place of publication/broadcast; (2) frequency of reporting (publication); (3) pricing strategy, and (4) the target audience.

The target audience information could include **diversity measures (gender, sexual identity, ability, race & ethnicity, Indigeneity, national origin, religion, language, age, class (SES), geography)** to ensure that news is representative of all citizens including marginalised communities. Here the coding could be multiple (for example, a news brand can target both gender diversity and age diversity).

To capture the full range of diversity, the scale of measurement should include all national, state and local news providers. This will be a base for local, state and national level news supply.

We note that the number of news brands or media companies alone is not a useful indicator of diversity. The number of news brands or media companies was only meaningful when there was a scarcity of news supply in the pre-digital era. Our research shows that the number of news brands audiences consume on average is declining over time. Instead, the number of social media platforms they use for news is increasing[29]. Therefore, it is important to measure the characteristics of each news brand or company, in addition to the number of brands.

In deciding which news businesses to include, there needs to be a coordination between the News Media Bargaining Code, the eligibility criteria of news businesses used in the register, and the framework.

The rising use of AI such as ChatGPT complicates the concept of 'news source' and definitions of news further. While it is currently measured from the supply end as a 'brand' it is likely to begin appearing in consumption research in the near future.

We suggest that if the purpose of the supply in news is to provide a baseline for tracking, then it may not be necessary to compile this data every year for cost effectiveness.

2. Availability of journalists

To adequately measure who creates news content in Australia, the framing question should include all levels of news production; local, state and national. We suggest broadening the framing question to *'How many journalists contribute to the production of **local, state and national** news?'*.

Similar to the brand and company measures, the metric to count journalists should include demographic information related to the 11 types of diversity measures (gender, sexual identity, ability, race & ethnicity, Indigeneity, national origin, religion, language, age, class (SES), geography) among journalists. The data from Census 2021 reveals a lack of reporters from diverse cultural backgrounds - only 9%[30]. However, Census data is only collected every 5 years and ACMA will need a more up-to-date information.

Employment type (full-time, part-time, casual, freelance) is an important indicator of how news content is supplied in the market. In addition to employment type, income and place of employment are also important data points to collect.

The type of local news outlet also needs to be considered. In our study on regional journalists[31] there were significant differences in employment and attitudes between journalists who worked for an independent news outlet serving one local community; an independent outlet serving two or more communities over a wider

[29] Park, S., McGuinness, K., Fisher, C., Lee, J., K., McCallum, K. & Nolan, D. (2022). *Digital News Report: Australia 2022.* Canberra: News & Media Research Centre. https://doi.org/10.25916/1xkk-jb37

[30] This figure is based on an analysis using ABS Tablebuilder https://www.abs.gov.au/statistics/microdata-tablebuilder/tablebuilder

[31] Fisher, C., Park, S., Howden, S., Lee, J. & McGuinness, K. (2020). *Australian Regional Journalists: What They Need and How They See the Future.* Canberra. News & Media Research Centre. https://www.canberra.edu.au/research/faculty-research-centres/nmrc/research/regional-journalists-what-do-they-need

geographic area; and those who worked for larger metro based networked outlets with a local reporter in the region.

From this data, ACMA can assess the extent to which the number of journalists impacts on the diversity of news content at local, state and national levels. For local news, the metric can also be used to identify communities with no local reporters, for example.

3. Number of owners

We understand this metric is to capture how many people or company exercise control over Australia's most influential sources of news. For this, it needs to capture data from all markets that news businesses operate; audiences' share, revenues from subscription/direct payment, and revenues from advertising.

To assess the concentration in the news market, both (1) the revenues and (2) audience consumption data, are needed.

As the revenue data is a critical measure to assess concentration in the market, we recommend collecting data on revenues by (1) subscription; (2) advertising; and (3) sponsored content. We acknowledge the difficulty of collecting information from non-public entities. Incentives developed through other media policies such as tax incentives or access to competitive funding, can be considered in order to improve the response rate.

The metrics counting the number of news company owners and parent company's (or controller's) needs to identify the industry they are based in at local, state and national level (i.e., superannuation, local government etc).

News output

4. Range of topics

As an indicator of news output diversity, rather than using the term 'range of topics', we suggest using 'type of content' instead. News topic is just one type of content descriptor.

Therefore, the framing question could be rephrased as '*How much **variety in content type** is present in Australia's news media market?*

To measure the variety in content type, we recommend broadening the content measure of hard vs soft news to include sponsored content, and opinion, both of which are growing as a proportion of content being published by news organisations. Audiences often find it hard to distinguish sponsored content from news. From the news businesses' perspective, sponsored content is becoming a key source of revenue and will continue to expand.

We suggest the ACMA collects the following metrics:

- count of articles by content type
    - hard vs soft
    - original news vs branded content
    - news story vs opinion piece
- count of hard news articles, as a % of total news output
- count of sponsored content, as a % of total news output
- count of news stories, as a % of total news output

The scale should be at all levels; local, state and national. This could be efficiently done by selecting subsamples rather than measuring the entirety of news content.

5. Range of viewpoints

The content aspect of the framework can be misused or misunderstood, as there are so many different dimensions to a news content. The main point here is to collect data that will show if there is sufficient *viewpoint diversity across local, state and national news contexts*. Furthermore, in this measurement, an assessment of qualities such as fairness, balance, impartiality, credibility of sources is missing. A careful consideration of how we can differentiate quality news from clickbait is also needed.

The average number of sources quoted or interviewed in news articles as a metric alone is not sufficient to gauge the diversity in viewpoints. We need to know how many *different viewpoints* were included and whether it was a *balanced* news article. We suggest **political viewpoint** and the **11 diversity measures** be included in assessing the content rather than a mere count.

This viewpoint diversity is critical to all levels of news content; local, state and national.

6. Local relevance

In the metric, 'original local news story' needs a clearer definition. We suggest using 'locally generated news' instead.

News engagement

7. Consumption

In the metric, the list of sources (news brands) needs to be an inclusive list that captures emerging platforms and alternative news sources. It also needs to include 'local' news because that is where news gaps and lack of diversity are more likely to exist.

In addition to collecting data on audience news consumption, we need to also measure their news preferences. The difference between consumption and preference will be an important indicator of whether a gap exists in news provision.

8. Impact

Impact measure particularly needs to include 'local' news, because research shows it is usually more trusted than national news. For ordinary citizens, local news is the most relevant and impactful in their daily lives.

It should be noted that trusted high-quality sources are not necessarily the most influential in the Australian news market. For example, News Corp news brands are among the least trusted news by consumers but have a big impact on the news market. The measure of impact may need refining.

> **2. Do you consider the framework, as outlined in the paper, would be an effective tool in measuring and tracking the health of local news in Australia?**

The three dimensions of measurement of local news in Australia are very useful in capturing local relevance.

However, we query the focus on news at a local level. Much research is being conducted by other research organisations examining the health of local news in Australia. We argue this framework needs to be much broader and include state and national news.

The definition of 'local' may be refined further by explicitly stating that local news is news that is *generated locally*, which means that a reporter from the local area produced the news story, whether it is about a national issue or a local story. This will help clarify 'originality' of the story, which ACMA defines as "a story is classed as 'original' if there is a by-line from an outlet's reporter, or if it has no indicators of being posted or reported elsewhere" (p36).

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3. Do you agree with the proposed scope of the news market?

6. Do you have views on whether the framework adequately considers the impact of social media and other digital platforms on media diversity, or if new or alternative measurement approaches are required?

We suggest the news market definition must be broad enough to realistically reflect audiences' news behaviour and preferences.

We understand expanding the scope of the news market complicates the measurement exercise. However, as it stands, the framework will only measure the supply and consumption of a prescribed range of established news outlets. This will not be an accurate reflection of what audiences are actually consuming.

It is not clear if the definition of news organisation in this framework aligns with the definition of news organisation in the NMBC News Register. If not, we recommend there be consistency of definitions of news and news organisations across these connected policy areas.

Existing data and research

7. Is there any additional third-party research or data that could be relevant to help inform the final design and/or implementation of the ACMA's news measurement framework?

Our approach to identifying relevant research is that rather than having a centralised database or resource that collects and compiles data that informs ACMA and government, it is important to have a variety of complementary research that informs policy decisions based on evidence. We have compiled a list of relevant research that will inform the design and implementation of ACMA's news measurement framework.

Digital News Report: Australia[32] (News & Media Research Centre)
- The *DNR Australia* is part of a global longitudinal study of news consumption and attitudes, the only study of its kind focusing on *news* audiences. Based on a survey of 2000+ adults it provides annual in-depth analysis of the state of news consumption in Australia. It is part of a global research project involving 46 countries co-ordinated by the Reuters Institute for the Study of Journalism at the University of Oxford.
- The *DNR Australia* provides unique internationally comparative data since 2015 which locates trends in Australian in a global context.
- Importantly, the *DNR* is not only a news consumption study; each year it also asks consumer attitudes towards contemporary news industry and journalism issues. The survey is designed annually with the input

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[32] https://www.canberra.edu.au/research/faculty-research-centres/nmrc/digital-news-report-australia-2022

from partner countries that consist of global academic leaders in the field of Communication and Media Studies.

- The team has unpublished global data that could be used for further analysis.
- This longitudinal study complements ACMA's *Communication and Media in Australia* annual study.

The Rise of Mistrust: Digital Platforms and Trust in News Media[33] (News & Media Research Centre)

- Australian Research Council Discovery Project DP210100157 (2021-2024)
- This project investigates how trust and mistrust in news change audiences' behaviours as they increasingly access news through digital platforms. Observing the global crisis of trust, the project undertakes a longitudinal analysis of trust and mistrust in news, a cross-country experiment that links trust and audience responses, and an in-depth qualitative study that provides specific contexts for these choices.

Valuing News: Aligning Individual, Institutional and Societal Perspectives[34]

- Australian Research Council Discovery Project DP220100589 (2023-2025)
- This project aims to identify the links between the preparedness of individuals to pay for news, the value of news brands and organisational cultures of news publishers, and the social value of news in promoting a democratic public sphere. Its significance arises with the ongoing crisis of news media business models, which is raising new questions about the future of journalism, and the changing role of governments worldwide in financing news production. Its expected outcomes include advancing debates about how to support public interest journalism, and the value of news as both a commodity and a public good. It will be of benefit to industry, policymakers and the community in addressing the prospects for Australian journalism.

Heartbeat of Australia: Tracking, Understanding and Engaging News Audiences (2022 – 2026) (News & Media Research Centre, ACM)

- Australian Research Council Linkage Project LP220100121
- This is a new longitudinal study funded by the Australia Research Council with ACM as the Linkage partner, focusing on regional news audiences and the role of news in community and personal wellbeing.
- The team has unpublished data that could be used for further analysis.

Sense of belonging among multilingual audiences in Australia (2023) (News & Media Research Centre, SBS)

- The report focuses on how the news media can play a role in driving a sense of belonging among multilingual audiences. The aim is to better understand the relationship between multilingual audiences' sense of belonging, their participation in Australian society, and perceptions of trust and representation in the news.
- The data collection involved a multimodal design of online (n=704, 65%), face-to-face (n=227, 21%) and phone (n=153, 14%) surveys to capture audiences who may not respond to an online survey (total respondents n=1,084). The survey was offered in six languages — Arabic, Cantonese, Italian, Mandarin, Vietnamese and English.
- The report will be published in May 2023.

[33] https://www.canberra.edu.au/research/faculty-research-centres/nmrc/major-projects/the-rise-of-mistrust
[34] https://mediated-trust-arts.sydney.edu.au/valuing-news/

Valuing Diversity in News and Newsrooms[35] (2023) (News & Media Research Centre, GNI)

- The purpose of this research is to explore audience perceptions of diversity in Australian news and how journalists relate to diversity in their professional practice. The findings show that while the news industry is beginning to address criticism of its lack of diversity, there is still much work to be done.
- News media provide an important resource for community cohesion, but media can also reinforce boundaries between groups by excluding marginalised voices and reinforcing stereotypes.
- The report is based on a national online survey of 2,266 Australians and 196 journalists, combined with in-depth interviews with 27 journalists about their views on diversity in the news and in newsrooms.

Local news Consumers report[36] (2020) (News & Media Research Centre, GNI)

- This report is based on a survey of 2,038 regional news consumers. The aim of the study was to identify gaps in local news provision in regional parts of Australia and whether there is an appetite for new grassroots news offerings.
- The study finds the strongest desire for additional news services among residents of communities where news outlets have closed. In light of the ongoing decline of regional news services, accelerated by the impact of the COVID-19 outbreak, this report points to the types of news people in information reduced communities are looking for and how much they are willing to pay for it.

Australian Regional Journalists report[37] (2020) (News & Media Research Centre, GNI)

- This study draws its findings from an online survey (n=107) and qualitative interviews (n=31) conducted with Australian regional journalists.
- The Telum Media database was used to identify as many journalists working in regional areas as possible; 2,374 journalists in 1,409 media outlets in regional Australia were contacted to complete an online survey and an option to be interviewed.

The Creative Economy in Australia, *What the Census 2021 Tells us* Briefing Papers[38] (News & Media Research Centre)

- The briefing papers present an overview of cultural and creative activity in Australia, drawing on custom tables of employment, industry and education data from the Australian Bureau of Statistics Census 2021.

Australian Bureau of Statistics Census data

- The Census data uses the Australian and New Zealand Standard Classification of Occupations (ANZSCO) code to classify jobs that was revised in 1996 that started to record a more detailed category of journalism occupations, 'Journalism and Other Writers' (4-digit level) with six 6-digit categories; Newspaper or Periodical Editor, Print Journalist, Radio Journalist, Television Journalist, Journalists and Other Writers not elsewhere classified (*not elsewhere classified,* nec), and Journalists and Other Writers not further defined (*not further defined,* nfd). Census data provides valuable information about the industries journalists work, employment status (full-time, part-time), income, education, field of study, gender, age and ethnicity.
- This data is useful but the classification for journalists and other media professionals needs to be updated.

[35] https://www.canberra.edu.au/research/faculty-research-centres/nmrc/research/valuing-news-diversity
[36] https://www.canberra.edu.au/research/faculty-research-centres/nmrc/research/local-news-consumers
[37] https://www.canberra.edu.au/research/faculty-research-centres/nmrc/research/regional-journalists-what-do-they-need
[38] Cunningham, S. & McCutcheon, M. (2022). *The Creative Economy in Australia, What Census 2021 Tells Us: Briefing Paper 1.* https://www.canberra.edu.au/research/faculty-research-centres/nmrc/major-projects/tabs/current-funded-projects/Briefing-paper-1-20221122.pdf

- The News & Media Research Centre has a team of researchers analysing Census data for all creative occupations and industries.

Australian Bureau of Statistics Business Longitudinal Analysis Data Environment (BLADE)

- BLADE is an economic data tool combining tax, trade and intellectual property data with information from ABS surveys to provide a better understanding of the Australian economy and businesses performance over time, which will be useful to track the news industry's performance over time.

Public Interest Journalism Initiative datasets

- **Australian News Index[39]**: Data about news outlets and organisations, publication formats and news scale. This dataset fulfills the need for a comprehensive database of news sources across Australia.
- **Australian News Mapping Project[40]**: Data about the coverage and broadcast geographies of news outlets, as well as changes in news markets.
- **The Australian News Sampling Project[41]**: Research conducted to understand the quantity, diversity and localism of public interest journalism being produced in local news ecosystems. This dataset is particularly relevant to local relevance.

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8. Should the ACMA seek to incorporate and build on existing third-party data when implementing its news measurement framework?

Yes. There is a wide body of existing and ongoing work that examines the issues of media diversity –in its many forms – and local journalism. Given the similar and related work being done by PIJI, the N&MRC and other research organisations, there would be efficiencies and continuity in incorporating this third-party data into ACMA's overall research programme.

There is also potential to collaborate and build a unified research programme to meet policy, industry and research needs. Additional funding to facilitate these collaborations is needed.

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9. Are there any restrictions or barriers to the acquisition, sharing or use of proposed third-party research or data that we should be aware of?

We don't anticipate major barriers to the acquisition, sharing or use of the third-party non-commercial data. It is becoming more common practice to make data available upon request for collaborative analysis with the organisation that owns the data. Access to commercial data may be more difficult and costly.

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[39] https://piji.com.au/australian-news-data-report/#ani
[40] https://piji.com.au/australian-news-data-report/
[41] https://piji.com.au/australian-news-data-report/#ansp

Further measurement activities

10. What are the most significant outstanding data gaps, and how should these be prioritised?

Culturally and linguistically diverse media

- Media serving culturally and linguistically diverse audiences in Australia extends across radio, newspapers and online platforms. However, there is no measurement of supply, content or consumption in Australia.
- Ethnic media have also experienced closures and contractions, particularly during the Covid-19 pandemic, but this data has not been collected.

Census occupation classification update

- Between the 2011 and 2021 Censuses there was an overall decline (16%) in the number of journalists in Australia. The largest reduction occurred in print media where the number of journalists halved. In contrast, the number of journalists 'not further defined' and 'not elsewhere classified' increased by 110% and 31% respectively. These two categories reflect the increase in the number of journalists who would not typically be working in a traditional journalism role.
- More than one-third are classified as 'not further defined' or 'not elsewhere classified' categories, which implies the categories do not reflect the changes that have occurred over the years.
- In the Census definition of professional journalism, freelancing and emerging occupations are not adequately classified.
- There is an urgent need for the Australian Bureau of Statistic to reconsider the classification of 'Journalists and Other Writers (ANZSCO 2124)' category.

Quality and diversity of viewpoints in political journalism and news consumption

- There is a lack of citizen engagement with political news when making voting decisions, among particular segments of the population. Political interest is particularly very low among young female audiences[42].
- Preliminary analysis of 60 qualitative interviews[43] with Australian adults ranging from those with high consumption of news to extremely low/no consumption reveals high levels of mistrust toward political journalism and politics in general. Many voted without knowledge about candidates and issues and did not pay attention to news coverage of the election because of perceptions of bias and uninformative coverage.

Understanding information gaps among marginalised segments of the population

- Marginalisation in the news typically occurs across gender, sexual identity, ability, race & ethnicity, Indigeneity, national origin, religion, language, age, class (SES), and geography.
- It is important to measure audiences' consumption behaviour through survey and qualitative studies. Equally important is to gauge the gap between audience preference and news provision. Audiences cannot consume news that is not provided. Therefore, studies that examine audience preference in addition to their actual behaviour is needed.

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42 Park, S., Fisher, C., McGuinness, K., Lee, J., K. & McCallum, K. (2021). Digital News Report: Australia 2021. Canberra: News & Media Research Centre. https://apo.org.au/node/312650.
43 Australian Research Council Discovery Project DP210100157 'The Rise of Mistrust' https://www.canberra.edu.au/research/faculty-research-centres/nmrc/major-projects/the-rise-of-mistrust

The impact of algorithms on news consumption and attention

- As audiences continue to shift to online news consumption the influence of algorithms on what news is seen and for how long continues to grow.
- Understanding this growing force is an urgent research priority.

> **11. Do you have views on potential pilot projects that the ACMA could undertake in 2023? What should be the ACMA's ongoing role in relation to these news measurement activities?**

Below are some pilot projects that the ACMA could commission to enhance its diversity measurement.

- Include culturally and linguistically diverse media brands and audiences in ACMA's annual consumer survey, *Communication and Media in Australia*.
- Work with ABS on updating ANZSCO Journalists and Other Writers (2124) classification.

Below are some pilot projects that the N&MRC could conduct in 2023, with funding support.

Definition of 'news' pilot study

Due to the rapidly shifting news consumption behaviour among Australians, updating and revising the definition of news is necessary. An exploratory study that examines audiences' experience of different types of existing and emerging news content will inform ACMA's definition of news and the scope of the news measurement activities.

Culturally and linguistically diverse audiences' news consumption qualitative pilot study

There are few studies that examine how culturally and linguistically diverse audiences access news and where information gaps exist, particularly in the local context. According to Census 2021, 5.8 million Australians (23%) use a language other than English at home. A qualitative study exploring the needs and gaps in news provision among the top five language groups (Arabic, Mandarin, Cantonese, Punjabi, Vietnamese) can inform further research into other language and cultural communities.

Disengaged audiences pilot study

News avoidance increased from 57% in 2017 to 68% in 2022 among Australian adults[44]. However, initial analysis of 60 qualitative interviews[45] suggest that disengagement with news does not equate to disengagement with politics and society. More research needs to be done to link disengagement with news, disengagement with politics and society and emerging forms of news.

Stocktake of culturally and linguistically diverse media outlets and brands in Australia

There is no centralised database of ethnic media in Australia. Through desktop research and consultations with organisations serving culturally and linguistically diverse communities in Australia, the Centre can compile a list of ethnic media at a local, state and national level, including all types of media platforms (radio, newspaper, online,

[44] Park, S., McGuinness, K., Fisher, C., Lee, J., K., McCallum, K. & Nolan, D. (2022). *Digital News Report: Australia 2022.* Canberra: News & Media Research Centre. https://doi.org/10.25916/1xkk-jb37
[45] Australian Research Council Discovery Project DP210100157 'The Rise of Mistrust' https://www.canberra.edu.au/research/faculty-research-centres/nmrc/major-projects/the-rise-of-mistrust

social media) that either (1) provide media services to culturally and linguistically diverse audiences in Australia and/or (2) provide non-English language media in Australia.

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12. Are there opportunities for the ACMA to collaborate with research organisations to help implement the news measurement framework?

The News & Media Research Centre has ten years of experience in researching the changing nature of the news media environment in Australia.

Our capacity and expertise relevant to the news measurement framework are:

- News consumption attitudes and behaviour using both qualitative and quantitative methods
- Content analysis and discourse analysis of news
- Media industry studies including journalists' career paths
- Diversity in news and newsrooms
- Local and regional news audiences

We suggest that ACMA draws on relevant expertise amongst the research community, with a collaborative approach.

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13. Are there any current or emerging technologies that could be considered by the ACMA to assist in content analysis or to help implement other aspects of the news measurement framework?

- ACMA could consider conducting content analysis using commercial media monitoring services such as Streem, Meltwater, Telum or Isentia.
- Including mobile diary methods (such as Indeemo application) to better track and understand news audiences could also provide rich information about audiences' shifting news behaviours.