



Friday, 17 March 2023

**To: The Manager,
Content and Platform Projects Section
Australian Communications and Media Authority**

RE: A New Framework for Measuring Media Diversity in Australia: Consultation Paper

Thank you for the opportunity to comment on the Consultation Paper mentioned above.

Firstly, we thank ACMA for its paper and previous work with *News in Australia: Diversity and Localism, International Comparisons*, published in December 2020.

We agree that,

1. A strong and diverse media market helps to promote pluralism and protect democracy.
2. Current rules administered by ACMA are limited in that they do not measure the volume of unique news output and consumption. Moreover, they do not measure the impact of the digital news environment.
3. Measuring the news market is important for obtaining insight into the sustainability of public interest journalism.
4. Diversity in sources, content, consumption and the level of connection (news related to locality), originality and level of civic journalism (news of public significance) are all important domains to measure in a new Framework.

We provide further recommendations to strengthen this Framework.



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NEWS MARKET

It is noted that the proposed scope for a news market includes ‘professional’ sources of news that can show a level of connection to Australia.

This would include digital news sites, podcasts and the social media presence of media outlets but exclude sources of participatory journalism like personal blogs and community-run forums, as well as news from organisations without sufficient editorial independence, like advocacy groups.

Recommendation

Given the significant consumption of international news by diaspora communities in Australia, it is recommended that data about the levels of consumption of international digital media be included in the Framework (if not already considered).

MEASUREMENT FRAMEWORK

Operational transparency and accountability

The degree to which news entities are transparent and accountable in how they operate is integral to media quality.

Often this issue is considered in the context of disinformation. We appreciate that ACMA and the Australian Government are considering further regulation in relation to disinformation. Still, it makes sense to incorporate operational transparency and accountability into the Measurement Framework for the following reasons:

1. The Disinformation regulatory framework may not include professional news. Disinformation occurs across a broader spectrum of the information environment than only professional news. Still, disinformation can be spread by professional news.



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2. Public interest: Australians would be interested to know the operational rigour of the entities they rely on most to consume news.
3. Including operational transparency and accountability would reinforce the Australian Government's work on safeguarding democracy (within Home Affairs).

Place in the Framework

Operational transparency and accountability would best operate as a metric under "Consumption." It could also work as a separate measure to draw causal/corollary insights into the relationship between operational transparency, accountability, and other factors (local coverage, diversity of viewpoints). Either way, it must be given a central place in this Framework.

Defining operational transparency and accountability

ACMA does not need to reinvent the wheel to define operational transparency and accountability indicators.

The Global Disinformation Index (GDI) risk rating methodology is based on the idea that a combined set of indicators can reflect a site's overall risk of carrying disinformation. In 2021, GDI did a news market assessment of Australia with QUT. Similar news market assessments were conducted in 2021 by GDI in Argentina, Brazil, Canada, India, Italy, Kenya, Malaysia, Mexico, Nigeria and Spain.

The Global Disinformation Index (GDI) has two components: A "Content pillar" and an "Operations Pillar". The Operations Pillar is most relevant here. The Operations Pillar looks at whether relevant policies are in place and made transparent by the news entity to the public. It does not assess the level of robustness of the policy based on good practice. It does not look at how the policies are being implemented, however Australian research projects could examine this. The 2021 Australian report found.¹

¹ <https://www.disinformationindex.org/country-studies/2021-8-31-the-online-news-market-in-australia/>



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The average score for all indicators in the Operations pillar was 47 points out of a possible 100, with only two websites scoring above 70 points. This pillar assesses the operational and editorial integrity of a news site. All scores are based on a scale of zero (worst) to 100 (best), as scored by the country reviewers according to the information available on the site.

The Operations indicators are the quickest wins to reduce disinformation risk ratings, as they represent policies that domains can immediately establish and make public.

All 34 sites in the sample have the potential to score perfectly on all the indicators of the Operations pillar if they adopt and disclose such operational policies and information.

Most domains in our sample received relatively low scores on the range of indicators that measure their operational transparency and accountability. The average score on the Operations pillar was 47 out of 100 possible points. Half of the websites scored below the average level. The two best performing sites, SBS and ABC, scored 74.09 and 71.85, respectively, due to the extensive information they have made publicly available regarding their operational and editorial policies and practices.

A majority of the outlets performed poorly on indicators measuring Attribution. The **Attribution score** is the rating for the number of policies and practices identified on the site which ensure that facts and content are accurately and transparently sourced and attributed. Five media outlets obtained a score of 0.

This indicates that these sites either did not abide by any of the policies in GDI's Framework that ensure accurate facts, authentic media, and accountability for stories, or did not publish these policies.

Overall, many media outlets in the sample did not receive a high score for their **transparency regarding funding**. This issue was found across all types of media outlets, from large conglomerates to small, independent outlets. It was difficult to find financial statements online for many domains. The lack of funding information may mask conflicts of interest and compromise a reader's trust in the media outlet, and



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greater transparency may be necessary to alleviate reader concerns regarding potential conflicts of interest from ownership and funding.

The average score for the **Ensuring accuracy indicator** across the entire sample was just 26 out of 100. The purpose of this indicator is to assess policies which ensure that only accurate information is reported, and that—if needed—corrections will be made promptly and communicated to readers.

The indicators for the Operations pillar are taken from the standards which have been set by journalists as part of the Journalism Trust Initiative (JTI).² As the JTI points out, adopting these standards raises credibility in the eyes of the public, compels traditional media to reassess their practices in the digital age, and encourages new media outlets to be more transparent about their business models.

Concentration of content references to religion and race

If there is a way to heat map content references to religions and race within the News Output measure (4. Range of Topics), this will be a practical step forward to address the negative profiling of particular communities. This issue has been identified as a concern by ACMA³ but is still without a meaningful remedy or counter-strategy.

For example, consider if there was a resurgence of ISIS or ISIS-related media coverage conflating terrorism with Islam and negatively profiling Muslim identity. This media concentration historically contributed to a rise in anti-Islam and racist nationalist movements. Such heat mapping would support ACMA to advise on the impact of the media market on pluralism and democracy. Moreover, it provides crucial context for evaluating the breadth and number of viewpoints. So, for example, if Muslims and Islam are consistently the number one *topic* but rarely given a *voice* or enabled to show their diversity of voices and narratives within Australian media, this poses a more significant problem.

² For more information on the JTI, which has adopted an ISO standard for the industry, please see: <https://jti-rsf.org/en/>

³ <https://www.acma.gov.au/publications/2022-06/report/what-audiences-want-audience-expectations-content-safeguards>



Including this metric also aligns with the National Anti-Racism Framework goals and the work within Home Affairs on safeguarding democracy. All Together Now has carried out research before on this sort of mapping.

Journalist and editorial staff diversity

At a journalistic and editorial level, we would support published data from news entities in Australia about the degree of cultural and religious diversity within their workplaces. Data relating to editorial and production staff must be included and disaggregated. This metric would also support the goals of the National Anti-Racism Framework. Media Diversity Australia is a stakeholder worth engaging in this space.

Recommendations

We recommend that the Framework specifically measure,

- a. Operational transparency and accountability of news entities, as defined in the GDI index. It could be introduced as a metric within “Consumption diversity”, or alternatively, as a distinct measure.***
- b. The proportion of Investigative News Reporting as part of the News Market.***
- c. Concentrations of news reporting on any religious or racial community (as protected groups under discrimination law frameworks) as a metric within “content diversity.”***
- d. Cultural and religious diversity among journalists and editorial staff in news entities.***

Should you wish to discuss the contents of this letter, please do not hesitate to contact us at the email below.



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Yours faithfully,

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