

Impact case study (REF3)

Institution: University of Westminster		
Unit of Assessment: 34 Communication, Cultural and Media Studies		
Title of case study: Promoting the Public Interest in Communication Policy		
Period when the underpinning research was undertaken: 2007 – 2016		
Details of staff conducting the underpinning research from the submitting unit:		
Name(s):	Role(s) (e.g. job title):	Period(s) employed by submitting HEI:
Steven Barnett Maria Michalis	Professor Reader	10/1994 ongoing 09/1998 ongoing
Period when the claimed impact occurred: Aug 2013 – Dec 2020		
Is this case study continued from a case study submitted in 2014? Y/N		
<p>1. Summary of the impact</p> <p>Prof Steven Barnett and Dr Maria Michalis have used their research knowledge to further the public interest by engaging extensively with communication policymakers, resulting in the following impacts:</p> <ul style="list-style-type: none"> • Barnett made significant contributions to policy recommendations concerning the undertaking of the 2016 BBC Charter Review and has played a direct role in the shaping of the public service broadcasting policy debate through his appointment as the specialist adviser to The House of Lords' Communications and Digital Committee. • Barnett has also enabled various policymakers to create informed decisions on media plurality from the perspective of public interest, for instance in the case of the proposed Sky-Fox merger. • Michalis has enabled citizen and consumer groups to communicate their positions on the safeguarding of digital terrestrial television spectrum allocation to high-level policymakers in a rigorous and effective manner (Euralva), and to enhance their understanding of regulatory issues and the broader European policy context (VLV). • Michalis' research and engagement has also led UNESCO to include an indicator within their framework for assessing Internet development that safeguards community-based Internet networks and their viability within a field that is dominated by corporations. 		
<p>2. Underpinning research</p> <p>Prof Barnett and Dr Michalis are both members of the Communication and Media Research Institute's (CAMRI) Political Economy and Communication Policy Research Network and the CAMRI Policy Observatory, through which they have institutionalised their research focus on communication policy and the political economy of communication at the University of Westminster. The research themes described below converge in Michalis and Barnett's organisation of policy-facing events such as the 'The Future of Public Service Broadcasting: Threats and Opportunities' (Nov 2019), which brought together key stakeholders from the public service broadcasting sectors in the UK and Europe to examine the urgent policy and regulatory questions being raised by new platforms and new global players in the audio-visual market.</p> <p>(1a) Public Service Broadcasting (PSB) and Journalism:</p> <p>During a time of huge technological upheaval and audience fragmentation, Barnett's work on the BBC and PSB has highlighted its contribution to the democratic, cultural, and economic welfare of the nation, and thus the importance of sustaining a publicly funded broadcaster of such scope and scale [1, 2]. More broadly, such work underlines the importance of maintaining a sustainable system of public funding for PSB and encourages a recognition of the value and need for robust regulatory structures that guarantee the independence and accountability of such broadcasters.</p> <p>Barnett's research also addresses broadcast journalism in the wider sense (PSB, citizen media, and commercial media). Having demonstrated how broadcast journalism can function as a source of independent and reliable news for an informed citizenry, Barnett posits strategies for ensuring that trust in journalism is well-placed and that democratic and citizenship goals are promoted within the industry. Such strategies include the introduction of regulatory structures around universality, content quotas, discoverability across platforms, and impartiality [1, 2].</p>		

(1b) Public Interest and Media Distribution Infrastructure:

Michalis' research highlights the policy issue of distribution infrastructure at a time when the transmission, exchange, and termination of digital content traffic increasingly lies with private commercial players. Such privatisation threatens universal, equitable, and affordable access to media content; hallmarks of PSB that Michalis argues ought to be maintained irrespective of the underlying delivery platform.

In this respect, Michalis' research challenges the increasing influence of commercial interests within media distribution infrastructure in two ways:

- (i) It identifies the key policy interventions required to ensure the long-term sustainability of distribution infrastructures that support universal, unmediated, and free at-the-point-of-use media access [5].
- (ii) It posits strategies for bringing the content produced by private media platforms in alignment with the content requirements that characterise the democratic and cultural benefits of PSB [4].

(2a) Media Plurality and the Democratic Deficit:

An increase in media concentration and a decrease in the number of media enterprises, at both a national and local level, has created a growing democratic deficit, a reduction in original journalism, and less diversity [1, 3]. Employing a critical perspective that produces real-world policy implications, Barnett advanced the following regulatory and legislative demands on the basis of his AHRC funded research into media ownership and plurality:

(i) Clearer legislative guidelines that identify and ensure appropriate levels of plurality in a democratic society, and updated, properly robust, regulation concerning media mergers and media diversity.

(ii) Policy solutions for addressing the democratic deficit at a local level, including a fairer distribution of existing subsidies, charitable initiatives, partnerships with PSBs, and levies on big tech companies.

(iii) Encouragement for emerging hyperlocal (community centred) enterprises that provide scope for replacing traditional local media as they close down or consolidate [3].

(2b) Regulating for Plurality in Communication Network Infrastructures:

The digital divide is the uneven distribution of access to contemporary communication technologies. Michalis has explored how plurality in network infrastructures can help to close this divide by diffusing power and fostering diversity [5]. Her work on the EU funded netCommons research project has shown that the multi-dimensional diversity offered by community Internet networks produces superior sustainability gains compared to conventional commercial communication networks [6].

Further, Michalis' work facilitates the recognition and adoption of such community networks on an international – and practical – level by positioning them within both the EU and UNESCO's existent telecommunications policy frameworks. Situating her findings within this context, Michalis demonstrates that these networks significantly contribute to economic and social sustainability, the self-determination of communities, and social integration [5, 6].

3. References to the research

- [1] Barnett, Steven and Judith Townend. 2015. Plurality and Public Service Broadcasting: Why and How PSBs Deserve Protection. In *Media Power and Plurality: From Hyperlocal to High-Level Policy*, ed. Steven Barnett and Judith Townend, 45-62. Basingstoke: Palgrave Macmillan. This Barnett edited volume was positively reviewed in [European Journal of Communication](#): 'a solid ground for both a theoretically informed and empirically grounded discussion of current changes and challenges surrounding media plurality'.
- [2] Barnett, Steven. 2011. *The Rise and Fall of Television Journalism: Just Wires and Lights in a Box?* London: Bloomsbury Academic. 51 Google Scholar [GS] citations as of 19/6/2020; positively reviewed in [Media, Culture & Society](#): 'an important book that is clear, engaging, compelling and lucidly argued'.
- [3] Barnett, Steven and Judith Townend. 2015. Plurality, Policy and the Local: Can Hyperlocals Fill the Gap? *Journalism Practice* 9 (3): 332-349; 40 GS citations (19/6/2020); peer reviewed.
- [4] Michalis, Maria. 2014. Infrastructure as a Content Issue and the Convergence Between Television and Broadband Internet. Insights from the British Market. *International Journal of Digital Television* 5 (1): 75-90. Peer reviewed.

- [5] Michalis, Maria. 2007. *Governing European Communications: From Unification to Coordination*. Lanham, MD: Lexington. 148 GS citations (19/6/2020); positively reviewed in [Telecommunications Policy](#): 'a rare integrated study of information technology, telecommunications and broadcasting [...] meticulously researched'.
- [6] Michalis, Maria et al. 2016. Efficient Collaboration between Government, Citizens and Enterprises in Commons Telecommunication Infrastructures. In *Community Connectivity: Building the Internet from Scratch – Annual Report of the UN IGF Dynamic Coalition on Community Connectivity*, ed. Luca Belli, 93-110. Rio de Janeiro: FGV Direito Rio. EU Horizon 2020 funded research (netCommons, [688768](#), see under "Funding")

Funding

- AHRC: [AH/K002864/1](#) Plurality and Media Power: new policy approaches to protecting the public interest in the 21st century, 04/2013 – 07/2015, £175,975, Steven Barnett (P-I) (related to outputs [1] and [2])
- EU Horizon 2020: [688768](#) Network infrastructure as commons (netCommons), 01/2016-12/2018, £264,672, Christian Fuchs (P-I), Maria Michalis (Co-I) (related to output [6])

4. Details of the impact

(1a) Prof Barnett's Impact on UK Policy regarding Public Service Broadcasting (PSB)

Barnett made **significant research-based contributions and recommendations** to the House of Commons Culture, Media and Sport (CMS) Select Committee's *Future of the BBC* (2015) report, which set out recommendations for the undertaking of the 2016 BBC Charter Review [A, B]. Barnett was one of the top 5 most cited witnesses (out of a total of 49), with appearances in six distinct paragraphs, as well as two further unique citations to his written evidence. The CMS report acknowledges Barnett's identification of the dangers implicit in non-public mechanisms of BBC funding [B, p. 72] and his recommendation to avoid the adoption of a 'market gap' approach when assessing the BBC's future [B, p. 19]. Further, Barnett's suggestion that licence fee revenue should not be treated as a communal source of public income available for raiding by other government-promoted schemes [B, p. 89] was reflected in the report's conclusions: 'we find the case for the licence fee as a source of funding for rural broadband and BBC Monitoring unconvincing' [B, p. 124]. Barnett's argument against top-slicing also featured in a 2014 House of Lords report on media plurality [C, p. 26]. Such policy ideas were influential in the UK government agreeing, as part of their 2015 financial settlement with the BBC, 'to end the top slice of the licence fee that has been used in recent years to fund broadband rollout, resulting in the restoration of £150m p.a. of licence fee revenue to the BBC by 2020/21' [D, p. 2].

Prof Barnett has also played a **direct role in the shaping of the PSB policy debate** through his appointment as the specialist adviser to The House of Lords' Communications and Digital Committee. Barnett was appointed in March 2019 to assist its inquiry on the regulation of the Internet and, as confirmed by the Clerk to the Committee, was chosen due to 'his deep understanding of the history of public service broadcasting and the regulatory structures that underpin it' [E]. The Clerk confirms Barnett 'helped inform the direction of the inquiry' through his advice 'on setting its parameters and appropriate questions to explore' and continued to make 'an invaluable contribution' by recommending witnesses, preparing oral questions, and 'ensuring that I did not overlook key technical aspects of the relevant regulation' [E]. Barnett 'scrutinised all the drafts of the report and helped by drafting additional text', thus 'ensur[ing] that the committee's final report is rigorous and stands up to scrutiny' [E]. The final report, *Public Service Broadcasting: As Vital as Ever* [F], was published on 5 November 2019 and received a formal Government response in February 2020, with further debates on its recommendations due to occur at the House of Lords [E].

(1b) Dr Michalis' Impact on Citizen and Consumer Lobbying: Euralva and VLV

In 2014, Dr Michalis was appointed by the European Alliance of Listeners' and Viewers' Associations (Euralva) as their adviser on European audio-visual policy. In response to EU communication policy consultations, Michalis wrote two submissions on Euralva's behalf arguing for the safeguarding of the digital terrestrial television (DTT) spectrum [G, H]. These submissions strongly opposed the reallocation of spectrum (frequency bands) to commercial providers of

broadband and mobile telephony and supported the position by emphasising the role of the DTT platform in promoting vital public policy goals such as European cultural diversity and creative innovation [G, §§2.9. & 2.2.]. Euralva is an independent alliance of national associations representing the interest of listeners and viewers of broadcasting and new media services. Michalis' research knowledge **enabled this network to communicate their positions to the EU in a rigorous and effective manner**, which they were previously unable to do. Euralva's President confirms that Michalis 'has made an extremely valuable contribution to our work, voice and presence in European policy circles [...] We'd like to believe that our voice, based on Michalis' valuable work on the submissions, contributed to the EU negotiating position and the outcome [...] where it was agreed that DTT broadcasters would keep exclusivity of the sub-700MHz band till 2023' [I].

Michalis applies the same knowledge and research expertise to her work with the Voice of the Listener & Viewer (VLV) – an independent, non-profit-making membership association working for quality and diversity in British TV and radio content – whose [Board of Trustees](#) she was invited to join in 2017. The VLV Chairman states that since joining the VLV Board: 'Michalis has contributed to the 20 VLV submissions to consultations' and her 'contributions have been particularly valuable in helping VLV place its work within the wider European policy context and **improving VLV understanding of regulatory issues**, in particular how these might relate to online media regulation' [J]. The Chairman highlights as especially useful, how, 'based on Michalis' intervention, VLV was able to raise specific issues regarding personal data protection' in their submission to the BBC's March 2018 distribution policy consultation, and her drafting of a segment on 'regulation of on-demand services and respective provisions in EU legislation and practice' for the April 2018 House of Lords Communications Committee inquiry into 'Public Service Broadcasting in the Age of Video on Demand' [J].

(2a) Prof Barnett's Impact on Policymaking Concerning Media Plurality

Prof Barnett's research-based advice has **enabled various policymakers to create informed decisions on media plurality from the perspective of public interest**. For instance, Barnett's oral evidence is quoted ten times in the House of Lords Select Committee on Communications' *Media Plurality* (2014) report, which evaluated the different proposals put forward to them via consultation, gave consideration to their merits and demerits, and arrived at 'a clear set of principles which we believe any reform to plurality policy should respect' [C, p. 5]. Barnett's contributions are quoted and discussed as part of this consideration process, providing explanatory context in some cases (for instance, providing their understanding of a hybrid approach to media revenue caps [C, p. 35]) and expressing positions / recommendations in others. In regard to the latter, the Select Committee expresses agreement with Barnett in their conclusions on the need for the scope of any plurality policy to encompass both local and regional media in order to address a local democratic deficit [C, pp. 16-17].

Ofcom's 2017 report [K] on the public interest test for the proposed acquisition of Sky plc by 21st Century Fox cites Barnett's published research, as well as his consultation submission, 15 times, demonstrating its **significance to Ofcom's advice to government on this controversial merger**. Notably, it dedicates 10 paragraphs [K, pp. 70, 83, 124-5] to Barnett's criticism of, and proposed alternatives to, Ofcom's measurement framework for media plurality (see also [L, p- 17 and 19]), in order to contextualise the complexity of measuring the impact, particularly on those with political power, of agenda setting by media corporations. The Ofcom report further quotes Barnett's evidence of a history of editorial interference by the Murdoch family, on all genres of programming, and his conclusion that Sky / Fox owner Rupert Murdoch has '*demonstrated that he cannot be trusted to uphold the standards of impartiality and accuracy which are integral to the 2003 communications act and that the transaction by giving full unqualified control will not serve the public interest*' [K, p. 128 and 131, italics in the original]. Barnett's assessment of the negative implications of this acquisition for media plurality was clearly reflected in Ofcom's advice to government: 'The transaction raises public interest concerns as a result of the risk of increased influence by members of the Murdoch Family Trust over the UK news agenda and the political process' [K, p. 4].

(2b) Dr. Michalis' Impact on Advancing Plurality in Communication Networks

As part of her participation in the EU H2020 netCommons project, Michalis presented her findings and recommendations on EU telecommunications policy and community networks at two workshops at the European Parliament (October 2017 and May 2018). This engagement took place in the context of the revision of the new European Electronic Communication Code.

In January 2018, Michalis and two netCommons colleagues made a presentation to UNESCO concerning the role of community networks within the EU telecommunications policy framework. Aiming to effectively address Internet freedom and to optimise its beneficial potentials, UNESCO subsequently invited Michalis and her colleagues to contribute to a consultation on draft indicators for Internet universality [M]. This resulted in **the incorporation of a new indicator explicitly referring to community networks** in UNESCO's final draft (Nov 2018) of their policy document *Internet Universality Indicators: A Framework for Assessing Internet Development*. The indicator reads as follows: 'C.6. Are communities able to establish their own networks to provide Internet access? Indicator: Legal framework enabling establishment of community networks' [M, p. 39]. These indicators will be used by UNESCO and other international bodies as the base criteria to evaluate national policies regarding Internet connectivity and their impact on human rights. As such, the organisation's request that its member states have a legal framework in place that enables community networks to be established – effectively a safeguard against any potential media homogeneity by large corporations – is a major impact on the advancement of media plurality.

A member of the UNESCO team confirms that 'Dr Maria Michalis' research expertise on Internet community networks provided a significant source of knowledge that impacted upon the development of these indicators – and, in particular, a new indicator [...] The insights provided by Dr Michalis helped us to recognise the importance of community based Internet networks and the need to ensure their viability within a field that is dominated by corporations' [N].

5. Sources to corroborate the impact

- [A] Barnett, Steven. In: House of Commons Culture, Media and Sport Select Committee (2014). Oral Evidence: Future of the BBC, HC 949.
- [B] Steven Barnett. In: House of Commons Culture, Media and Sport Committee (2015). *Future of the BBC* (4th Report of Session 2014-2015). London: The Stationery Office Limited.
- [C] Steven Barnett. In: House of Lords Select Committee on Communications (2014). *Media Plurality* (1st Report of Session 2013-14). London: The Stationery Office Limited.
- [D] BBC Consultation on Age-Related TV licence Policy (The Future of the Over-75s Concession) – A Response from the Welsh Government (2019).
- [E] Letter of Corroboration from the Clerk of the House of Lords' Communications and Digital Committee.
- [F] House of Lords Select Committee on Communications (2019). *Public Service Broadcasting: As Vital as Ever*.
- [G] Euralva [European Alliance of Listeners' and Viewers' Associations] (2015a), Response to Draft RSPG Opinion on Common Policy Objectives for WRC-15.
- [H] Euralva (2015b), Response to Draft RSPG Opinion on a long-term strategy on the Future Use of the UHF Band (470-790 MHz) in the European Union'.
- [I] Letter of Corroboration for Impact on Shaping Euralva's Policy.
- [J] Letter of Corroboration for Impact on Shaping VLV's Policy.
- [K] Steven Barnett. In: Ofcom (2017). *Public Interest Test for the Proposed Acquisition of Sky plc by 21st Century Fox, Inc: Ofcom's Report to the Secretary of State*. London: Ofcom.
- [L] Steven Barnett. In: Ofcom (2015). Measurement Framework for Media Plurality (consultation on Ofcom's proposed advice to the Secretary of State for Culture, Media and Sport).
- [M] UNESCO (2018) *UNESCO's Internet Universality Indicators: A Framework for Assessing Internet Development*
- [N] Letter of Corroboration for Impact on Shaping UNESCO's Policy.