

# **A new framework for measuring media diversity in Australia**

## Advice to government on the outcomes of public consultation and implementation

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# Executive summary

## **Diversity is a critical and longstanding objective of Australian media policy**

Media diversity policies are designed to encourage the production and distribution of a wide range of news, information and viewpoints across the media market, while preventing any single media voice from exerting unacceptable levels of influence over public discourse. While this longstanding objective continues to resonate with Australians, the Australian news media market and Australians' news consumption practices have changed markedly over recent decades.

A key shift has been from where Australians source their news and information. Recent unpublished ACMA research reveals that 79% of adult Australians accessed news content online in 2023, compared with 58% for TV, 37% for radio and 18% for print.<sup>1</sup> At the same time, the Australian media industry is continuing to undergo structural and organisational changes, partly in response to growing financial pressures, leading to ongoing concerns around the health and sustainability of public interest journalism, and the current state of media diversity more generally in Australia.

We are in an increasingly complex and shifting media landscape, consisting of traditional news sources alongside a growing number of online sources, including digital news outlets, social media services, news aggregators and other digital platforms. Various streams of work have been undertaken to better understand and respond to this evolution, including the Australian Competition and Consumer Commission's [Digital Platform Services Inquiry 2020-25](#) that is examining markets for the supply of digital platform services. However, new approaches to monitoring and measuring the media market are also necessary to enable a more nuanced understanding of these changes and the extent to which contemporary audiences have access to a diversity of news, information and viewpoints – both on and offline.

## **The ACMA developed a framework to better measure the state of diversity across the Australian media landscape**

In accordance with our statutory functions, the ACMA monitors changes in the Australian media market to both inform itself and advise government on industry trends that may be relevant for policy and decision-making. We do this through our ongoing research program, including our annual [Communications and media in Australia](#) series.

In 2020, the ACMA published its [news measurement framework](#) as part of a broader research project examining key regulatory objectives for the Australian news market. This framework was based on similar work undertaken internationally and sought to better understand the state of news diversity and localism in light of significant changes to supply chains and consumption behaviours over previous decades.

While this work was paused due to a shift in agency priorities arising from the COVID-19 pandemic, we decided to release the paper as a 'think piece' in order to inform the parliament's [Media diversity in Australia](#) inquiry and to prompt a broader discussion among Australian researchers and policymakers on alternative ways media diversity and localism might be measured in the future.

Since the release of the framework, the sector has continued to evolve and adapt in response to ongoing digital disruption and other external factors, including the evolution of the COVID-19 pandemic and the continuing financial pressures on news

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<sup>1</sup> Survey participants were where they accessed news during the previous 7 days to June 2023. Australian Communications and Media Authority (ACMA), *Annual consumer survey*, ACMA, Australian Government, unpublished, accessed 26 July 2023.

providers. There have also been several new public policy interventions designed to support the sector throughout this period, as well as new sources of research and data relevant to the ACMA's earlier work. These are key to understanding changes across the sector.

In late 2022, the [Australian Government announced](#) that it had asked the ACMA to resume work on our news measurement framework, and to consult on its feasibility and implementation. It is intended that this work will inform and support the government's broader News Media Assistance Program (News MAP) initiative, providing a robust evidence base to help inform advice to government and policymakers, including on possible policy, regulatory or programmatic interventions.

In January 2023, the ACMA released a [consultation paper](#) seeking comments on the feasibility and scope of the proposed framework and whether there was additional third-party data relevant to the framework and ideas for pilot projects or other implementation considerations.

### **Changes have been made to the original framework based on stakeholder feedback and to better align with News MAP**

We received [24 submissions](#) across media and industry associations, academia and non-government organisations (NGOs). As part of the consultation process, we also ran 3 targeted workshops with industry and academic stakeholders.

Stakeholders were generally supportive of the idea of measuring the Australian news market, however, there were diverging views in how broad this examination should be, and who should do the work. Several stakeholders also raised questions around the purpose of the exercise and how it would be used in practice.

Industry submissions tended to prefer a narrower framework and more limited role for the ACMA, based on existing data and regulatory concepts. By contrast, academic and NGO submissions tended to prefer a broader framing of the news market and more expansive assessment of diversity factors that may not have previously been measured or examined. Several industry and NGO submitters also raised concerns about the proposed assessment of content diversity being undertaken by a government agency, and advocated for any systematic review of news content to be undertaken by parties that are at arm's length from government.

Building on this feedback, we have made several key changes to our original model. Most notably, the updated framework has been simplified to focus exclusively on measures of diversity, rather than seeking to assess both diversity and localism objectives (like originality and local relevance) concurrently. This change helps provide clarity around the purpose of the framework and emphasises the diversity of news types that are present across the supply chain that may or may not have a geographic dimension, including news for culturally and linguistically diverse communities and First Nations Australians.

We have reiterated our initial focus on 'professional' sources of news and information to maintain a manageable scope, noting the framework may expand over time to capture a broader range of non-professional sources. We have also expanded the scope of the 'news impact' indicator to include an assessment of audience trust.

Several underlying indicators have also been combined and revised to address stakeholder concerns, particularly around the scope of the content diversity assessment. To reflect these changes, and to better align with News MAP and the government's reform priorities, the framework has also been renamed the 'Media Diversity Measurement Framework'.

### **The ACMA is recommending it coordinate and implement the framework**

In recognition that many of the data gaps first identified by ACMA in 2020 have since been addressed by third-party researchers, it is important that any further work undertaken under this framework is feasible, fit-for-purpose, non-duplicative and provides value to government and the broader community.

Several implementation options have been considered. These include whether there is a need for a regular report to government into the state of the news market in Australia and, if so, who should undertake this work, and whether the framework itself should remain static or be assessed and expanded over time to capture a wider range of diversity considerations and address outstanding data gaps.

We consider there is benefit in testing the Media Diversity Measurement Framework through the development of an initial ACMA report which would bring together existing primary and third-party data, research and analysis. This report could then form the basis of a new regular ACMA reporting series, to be produced every 2 years, which would assist the government, industry and other key stakeholders in seeing how the news market is trending against key diversity metrics.

The ACMA has well-established data and research capabilities which, over time, could expand to build or take carriage of key news measurement datasets. This ACMA is also well placed to commission new research projects to address data gaps.

Over the longer term, the framework could also expand to include an examination into the extent to which news outlets present a diversity of viewpoints. Given its complexity and sensitivity, this work would preferably be undertaken by independent researchers outside of government influence.

The ACMA makes 4 recommendations in this report:

- 1. The government agrees to release the ACMA's advice on the outcomes of public consultation and the revised Media Diversity Measurement Framework (this report).**
- 2. The government agrees to the ACMA developing a regular Media Diversity Measurement Framework report series (from the end of 2024, and every 2 years after), examining the state of the Australian news market, using the revised framework and existing data. This report series will also look to review and evolve the framework over time.**
- 3. To support the development of the Media Diversity Measurement report series, the government agrees that the ACMA should build or take carriage of key datasets on the news market. This could also include commissioning new research projects to address identified data gaps and expand the framework over time.**
- 4. To address concerns about the ACMA assessing the content or quality of news output, the government agrees that the ACMA consult further with academic and other research organisations on their capacity to undertake content diversity assessments (including through automated means) and reports back on the feasibility and cost of outsourcing this component of the Media Diversity Measurement Framework.**

# Background

As part of our ongoing regulatory and research function, the ACMA is responsible for monitoring and reporting on changes in the media market and associated audience behaviours. This work enables the ACMA to be responsive to the changing expectations of Australian audiences, and to help inform our advice to government, including on possible amendments to regulatory or legislative frameworks.

In 2019, as part of a broader self-initiated research project examining whether existing safeguards for news and journalistic content were continuing to meet community expectations, the ACMA began work on a new conceptual framework to help us examine and measure different aspects of diversity and localism within, and across, the news market.

The objective of this framework was to present a complete picture of the contemporary news landscape. It sought to capture a breadth of data that could track how Australia's media ecosystem was changing and assist policymakers when considering media reform. This included an examination of both 'traditional' sources of news – TV, radio and print – as well as the wealth of largely unregulated news content that can now be found online, including through the web presence and mobile apps of large media outlets, digital-only news websites, blogs, podcasts, and via social media, third-party news aggregators and other digital platforms.

The framework was built on similar news measurement approaches adopted internationally and was informed by a literature review, qualitative research on consumer attitudes and consultation with leading researchers and subject-matter experts, both in Australia and abroad. It was envisaged the framework could become an ongoing resource for government and industry that the ACMA and other partners, in a combination of ways, could maintain, expand, and adapt over time.

Work on this framework was paused in March 2020 due to re-prioritisation of ACMA activities in response to the COVID-19 pandemic. However, in December 2020, we decided to publish our existing research into news measurement, including a detailed paper titled [News in Australia: diversity and localism – News measurement framework](#).

This was in conjunction with a submission to the Senate Environment and Communications References Committee's inquiry into Media Diversity in Australia, and sought to provide new insights, as well as to prompt a broader discussion among Australian researchers and policymakers on alternative ways media diversity might be measured in the future. At the time, we noted that we had no plans to implement the measurement framework, and that further consultation on the design and methodology would be necessary to settle on any final framework.

Over the subsequent 3 years, the Australian news media landscape has continued to evolve and adapt in response to ongoing digital disruption and other external factors, including the onset of the COVID-19 pandemic and the corresponding declines in advertising revenue for Australian media organisations. In response, there have been several new government interventions designed to support the sustainability of Australia's news industry,<sup>2</sup> as well as industry and philanthropic initiatives,<sup>3</sup> and new sources of research and data that are relevant to the ACMA's thinking and could help

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<sup>2</sup> These include [temporary tax and short-term red tape relief](#), grants to support the [production of public interest journalism](#), grants to support the [increasing printing cost for print publishers](#) and the development and passage of the [News Media and Digital Platforms Mandatory Bargaining Code](#).

<sup>3</sup> Such as the [Google News Initiative](#), the [Public Interest Journalism Initiative](#), and the Judith Neilson Institute for Journalism and Ideas.

inform or contribute towards the broader implementation of a news measurement framework discussed below.

Through the News Media Assistance Program (News MAP), the government has flagged the need for a more robust and long-term evidence-base to inform policy interventions and other measures that support the provision of public interest journalism and the longstanding objective of media diversity. In November 2022, the Hon Michelle Rowland MP, Minister for Communications, announced that new and better approaches were needed to measure news diversity, and signalled that she had asked the ACMA to resume its earlier work and to consult on a media diversity measurement model to inform News MAP.

This paper provides the outcomes of our recent consultation and proposes an updated, simplified model for implementation. It should be read alongside the ACMA's December 2020 [News in Australia: diversity and localism – News measurement framework](#) paper.

The ACMA would like to thank all stakeholders who provided feedback and contributed to this process.

### **Why do we need a new framework for measuring media diversity in Australia?**

A strong and diverse news media market helps promote pluralism and protect our democratic processes – ensuring Australians have access to a range of sources of news and information, while preventing any single media voice from having excessive influence over the news agenda, public opinion and political discourse.

The current media diversity rules, set out in the *Broadcasting Services Act 1992* and administered by the ACMA, regulate the number of independent media 'voices' in a market. This is solely based on an assessment of the ownership and control of commercial television and radio broadcasting services, as well as any 'associated newspapers' operating within these licence areas.

While these rules serve as a proxy for measuring levels of media concentration and diversity, they do not examine other important measures of a diverse media landscape, like the volume of unique news output or audience consumption patterns. Nor do they account for the impacts of the digital news environment, including the increasingly prominent role played by social media and other digital platforms in shaping the news ecosystem and our news diets.

Measurement is also important for understanding and tracking what news services are available at different localities, geographic scales, and for different groups and communities – including news for culturally and linguistically diverse Australians. Amid ongoing concerns regarding newsroom closures and the sustainability of public interest journalism in Australia, a more comprehensive and regular examination into the state of the news market could help identify gaps in the provision of news, examine and track emerging market developments and test the effectiveness of public interventions.



# Consultation outcomes

In January 2023, the ACMA released a short [consultation paper](#) seeking public feedback on our draft framework and its implementation. We asked 13 questions based on the scope and likely effectiveness of our 2020 framework, new sources of third-party data and research that could inform our thinking and opportunities for further research projects to address outstanding data gaps.

The consultation period ran until 17 March 2023, resulting in 24 stakeholder submissions. During this time, we also held 3 workshops with key industry and academic stakeholders. The [submissions, along with summaries of the stakeholder workshops](#), were published on the ACMA's website.

## Key findings

Most stakeholders were supportive of the concept of a measurement framework and of its broader objective of developing and monitoring a range of new media diversity metrics. However, views differed on the potential scope of the framework and where the ACMA should focus its efforts.

### Definition and scope of the news market

The original framework proposed examining all 'professional' sources of news and opinion, including digital news sites, podcasts and the social media presence of media outlets, but excluding sources of participatory journalism like personal blogs and community-run forums, as well as news from organisations without sufficient editorial independence, like advocacy groups. We also proposed excluding news sources that did not have a sufficiently strong link to Australia, as well as entertainment-oriented publications or programs where the predominant purpose is to entertain rather than inform, such as celebrity gossip, fashion or lifestyle news.

Submissions differed on how to define the news market and what news sources should be included within scope of the ACMA's examination. Some, like Southern Cross Austereo (SCA), the Media, Entertainment and Arts Alliances (MEAA) and the Public Interest Journalism Initiative (PIJI), supported the ACMA's original position to maintain a narrow definition of the market based on 'professional' or 'core' news sources. However, others, including the ABC, the News and Media Research Centre (N&MRC), the Centre for Media Transition (CMT), the Community Broadcasting Association of Australia (CBAA), First Nations Media Australia (FNMA), and the Local and Independent News Association (LINA), called on the ACMA to consider a broader view of the news market. This was on the basis that an examination that does not include international media, online influencers, and community-driven or emergent forms of 'non-professional' journalism, would fail to capture the true state of media diversity in Australia or reflect changing news consumption patterns within Australia.

The community broadcasting sector advocated for a broader definition of the market to reflect the important role played by those working in a volunteer or not-for-profit capacity, particularly in regional and rural areas, who contribute to the news environment but may not always have professional qualifications. The MEAA also advocated for freelance journalists to be included in any measure of the news workforce.

### **ACMA response**

The ACMA considers that the framework needs to be both manageable in scope and flexible enough to capture and monitor important trends in the supply and consumption of news and information.

Noting the lack of consensus on scope, we consider an initial focus on ‘professional’ or mainstream news sources, based on similar criteria adopted in the News Media and Digital Platforms Mandatory Bargaining Code, should be undertaken. Similarly, any focus on news workforce should initially be based on those contributing towards journalism at professional news outlets.

However, as more evidence is collected over time about the professional and alternative sources of news and information most relied upon by Australians, the assessment can be expanded accordingly.

### **Treatment of news across different geographic scales**

Many stakeholders welcomed the ACMA’s emphasis on measuring localism on a standalone basis. There was also broad support for the proposed dimensions of localism (originality, connection and civic journalism) and for the corresponding shift away from assessing local news provision according to broadcast licence areas to local government areas (LGAs).

Some, like the PIJI and Australians for a Murdoch Royal Commission (AMRC), suggested more geographic granularity should be provided, including through the introduction of a ‘community’ scale that added a remoteness element to the assessment, or that focused on Commonwealth electoral divisions. Most stakeholders also rejected the ACMA’s original proposal to restrict content sampling to LGAs with populations above 10,000 people, noting concerns around news deserts and the importance of building an understanding of what is happening to journalism in smaller, rural localities with populations below 10,000.

Commercial broadcasters largely disagreed with those calling for greater levels of geographic granularity in the framework, arguing that as local content broadcasting rules are already tied to licence areas, an LGA-based assessment would be inefficient and too fine a measure for regulatory purposes. This builds on a broader argument made by the commercial broadcasting sector that the ACMA should closely adhere to the existing legislative definitions in the *Broadcasting Services Act 1992*, and that any new measurement activities or collection of data should be deferred until the scope, timing and methodology of the government’s proposed ‘wide-ranging review’ of Australia’s broadcasting legislation is known.

A common theme among stakeholders was that more work needs to be done to clearly define the concept of ‘localism’, including whether the focus should be on the local, physical presence of newsrooms, news ‘generated locally’, or stories about local areas that may be produced by larger national news outlets.

Finally, some stakeholders suggested that – while important – localism and geographic diversity should not be the sole focus of the ACMA, particularly when assessing content diversity. Christian Media and Arts Australia (CMAA), for example, noted that other forms of news, including those that foster cultural and religious faith connections, exist across localities or are locality neutral. There was a strong push from several stakeholders for greater consideration of intersectionality issues and developing a better understanding of the news environment for, and reporting on, First Nations Australians, culturally and linguistically diverse communities, the LGBTIQ+ community, people of differing faiths, and people with disability.

### **ACMA response**

The provision of local news is an important aspect of a diverse media landscape. The Media Diversity Measurement Framework will seek to capture the physical location of news outlets, as well as the geographic scale of news sources based on their target audience and availability within LGAs. Further, no professional news sources or LGAs should be excluded from examination.

However, to meet the broader objectives of News MAP, localism is no longer planned to be a standalone area of examination under the framework. While local news sources will still be identified, and issues relating to local news output may still be examined via case studies and targeted one-off studies, a systematic review of the degree of localism within news content is not envisioned.

### **Examinations of ‘content diversity’**

The original 2020 framework proposed identifying a sample of local news content and assessing the levels of content diversity within news output based on 3 standalone indicators: range of topics, range of viewpoints and local relevance.

Stakeholders had mixed views about the use of the ‘hard’ and ‘soft’ news categories, whether the indicators should be given equal priority, and even the inclusion of an assessment of content diversity.

Free TV Australia, for example, strongly rejected the idea of assessing content diversity via the framework, arguing that the ACMA’s focus should be on the structures of the news media industry, and that there is ‘no demonstrable reason’ for the ACMA to be measuring news output. Others, like the CMT, supported an examination of content diversity but suggested this work might be better off being undertaken by researchers independent of government. This view was shared by the AMRC, which suggested that academic institutions and organisations hold and analyse data instead of the ACMA.

The proposed examination into the ‘range of viewpoints’ was most contentious. While many of the submissions advocated for an examination of viewpoint diversity, the ACMA’s proposed methodology of counting the number of quoted sources per article was broadly rejected as being too simplistic and imprecise. The Federal Member for Goldstein, Zoe Daniel MP, for example, called for the ACMA to embrace more qualitative measures.

### **ACMA response**

Examining news content output is key to understanding whether a news outlet is delivering original reporting in the public interest and of relevance to its intended audience.

However, we accept that content analysis is resource intensive and can involve a level of subjectivity and judgement. As such, we have narrowed the focus and, at least initially, will only seek to examine content diversity based on the topics and variety of news produced by news outlets, rather than also seek to assess relevance and range of viewpoints. An assessment of news topics and variety would serve as a proxy for determining the volume of ‘civic’ or ‘public interest’ journalism being produced, without needing to assess the actual content of individual articles.

Over time, it is possible that automated classifiers could be relied upon to undertake content analysis at scale, as well as consider qualitative news content assessments based on key diversity concerns.

### **News impact, trust and quality**

Several stakeholders, including LINA, Zoe Daniel MP, Fremantle Herald and the National Ethnic and Multicultural Broadcasters' Council (NEMBC), raised the importance of understanding and monitoring levels of audience trust in news, and advocated for its inclusion in the framework. The Alfred Deakin Institute for Citizenship and Globalisation (ADI) also proposed that the framework be expanded to include considerations of news 'quality'.

In assessing impact, many stakeholders raised concerns about the role of social media, digital platforms and algorithmic recommender systems in influencing the news diets of Australians. Online metrics such as shares, impressions and engagements were flagged as potential sources of data that the ACMA could rely upon to build its understanding of the impact of intermediaries.

#### **ACMA response**

We agree that audience trust is an important aspect of measuring exposure diversity and have broadened the original 'impact' indicator to include an explicit reference to audience 'trust'.

We have not included 'news quality', as this implies an objective assessment based on a set of criteria. However, as part of our assessment of news impact, we may seek to explore what audiences consider to be high-quality journalism, or how third-party organisations like NewsGuard or social media companies decide on which news outlets are reputable and reliable.

An examination into the impact of digital intermediaries on the Australian news market is a potential future project, as discussed in the next section.

### **Amendments to the framework and treatment of standpoint diversity**

Standpoint diversity is the extent to which all peoples – but particularly those belonging to diverse and often marginalised groups – are both a part of, and represented by, the media environment. It was originally excluded from the framework based on the complexity of the research required but it was acknowledged that standpoint diversity was a factor that could be examined in later iterations of the framework, subject to stakeholder views.

There was a strong response to the ACMA's proposal to exclude standpoint diversity, with several stakeholders recommending that it should be included in the framework, or at least not be wholly out of scope. CBAA, LINA, FNMA, Croakey Health Media, and the Australian Muslim Advocacy Network (AMAN), all proposed an initial focus on an assessment of the diversity of reporters producing news content.

#### **ACMA response**

While it is important to baseline and monitor changes, any measurement framework – much like the news market itself – needs to be adaptive and flexible to respond to changing market conditions, technological developments and shifting priorities. As part of any implementation work, periodic reviews of the

framework should be undertaken, with the expectation that the scope of the framework would grow over time to address outstanding data gaps.

Standpoint diversity is a complex and difficult area of study that requires particular care and sensitivity. While we are not proposing to add standpoint diversity or workforce diversity as indicators at present, we acknowledge it remains an important consideration for assessing media diversity and anticipate that future iterations of this work could place a greater emphasis on these issues.

# The updated framework

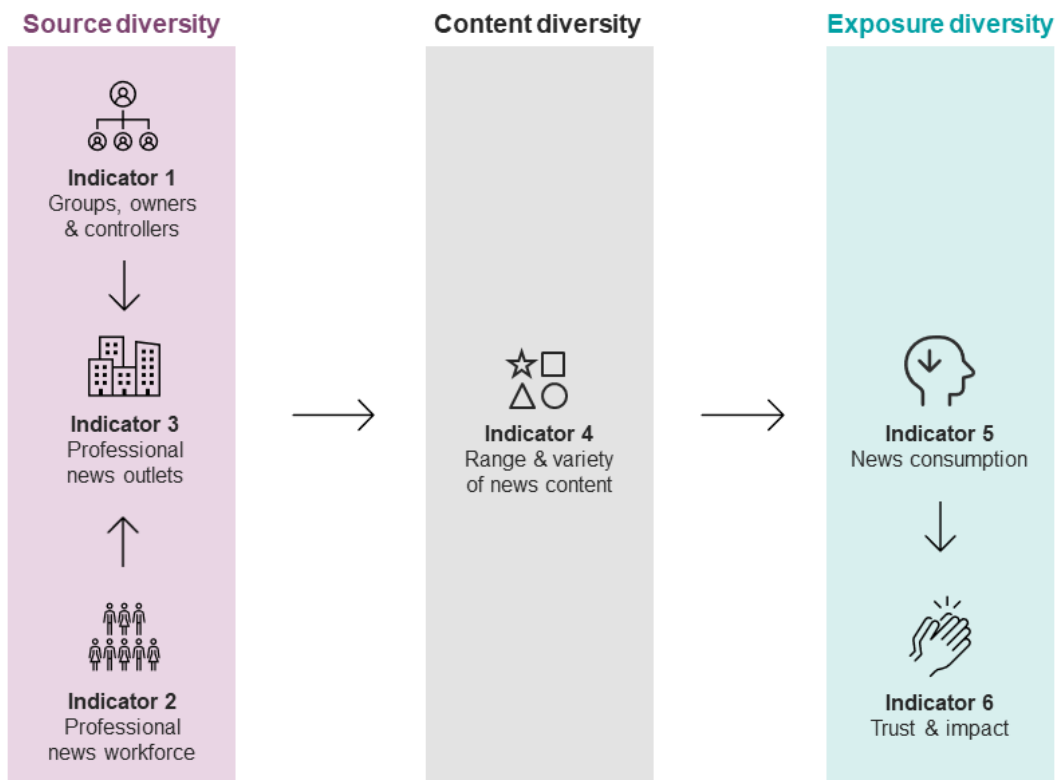
Based on the outcomes of the consultation process and the broader objectives of the government's News MAP initiative, we have updated and simplified our original media diversity framework.

The Media Diversity Measurement Framework now consists of 6 key indicators, across the 3 previously established dimensions of media diversity:

- > **source** – the extent to which media markets are populated by a diverse array of content providers
- > **content** – the extent to which content presents difference voices, viewpoints, and demographic profiles
- > **exposure** – the extent to which audiences consume a diverse array of content.

This broadly aligns with the work of US media scholar, Philip Napoli, and his examination of diversity across the news supply chain. A detailed breakdown of the framework, including key metrics, is provided at Appendix A.

**Figure 1: Media Diversity Measurement Framework (initial state)**



## Key changes

### **Greater clarity around scope and purpose of framework**

Throughout the consultation process, stakeholders sought clarification about the underlining objectives of the framework, its terminology and proposed application. Some of this confusion originated from the intentional shift in our language away from measuring 'news diversity and localism' in the 2020 paper, towards measuring 'media diversity' in the 2023 consultation paper.

These changes are largely the result of a broadening of our focus. While this work was originally pitched as a standalone, self-initiated project for the ACMA, the framework is now anticipated to directly contribute towards News MAP and help build a robust evidence-base to support ongoing government decision-making on the regulation of media diversity and other media reform priorities.

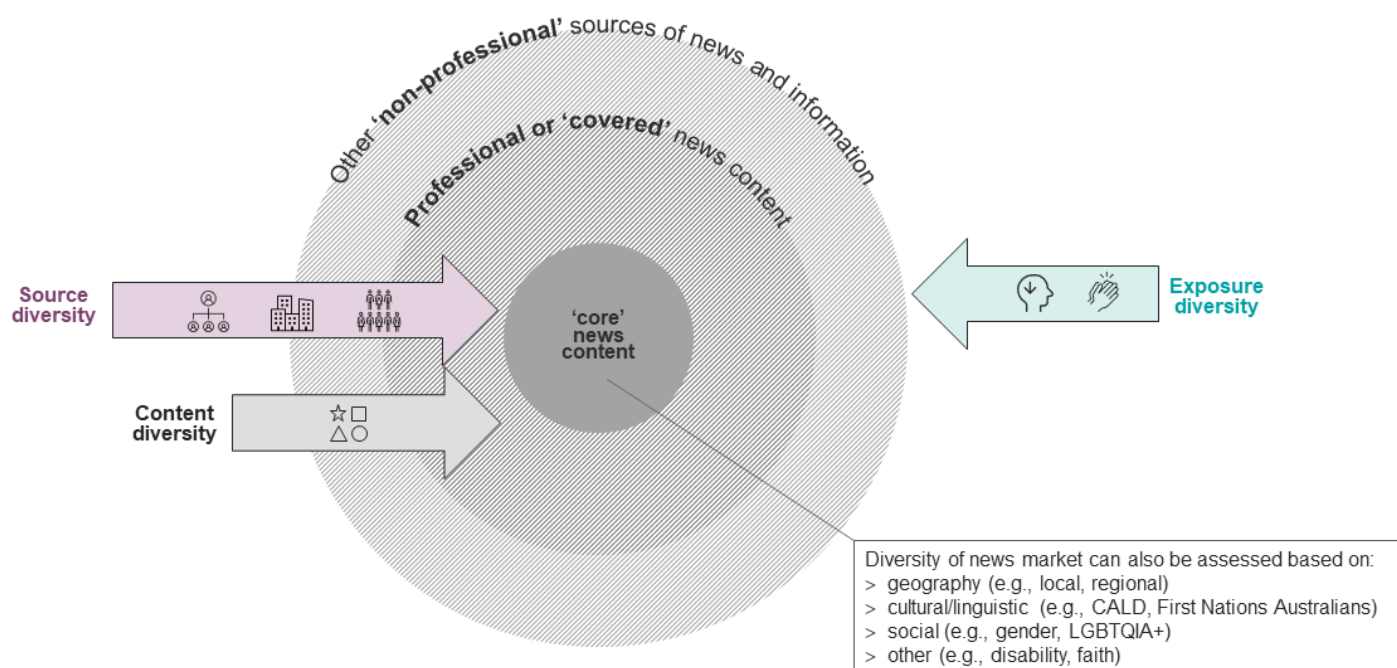
By re-focusing this work on the single concept of 'media diversity', rather than both diversity and localism, we have also sought to simplify the framework and ensure it has broader applicability, including among diverse and often marginalised groups. Importantly, localism objectives will still be measurable under each element of diversity under the framework.

### **Expanded examination of exposure diversity indicators**

Stakeholder consultation emphasised the importance of clearly defining the news market. To this end, the initial focus of the measurement framework will remain on the supply of news from 'professional' news outlets, based on the types of organisations that would ordinarily meet the news business eligibility requirements in the News Media and Digital Platforms Mandatory Bargaining Code (namely, an adherence to professional standards, editorial independence and production of 'core news'). This is similar to the test applied by the PIJI in its Australian News Index.

At the same time, it is vital that we build a more detailed understanding of what sources of news and information are being consumed and relied upon by Australians, irrespective of whether these sources meet the 'professional' threshold. As such, our examination of news consumption and impact (under the Exposure Diversity pillar) will take a more pragmatic, consumer-focused approach, based on the sources of news and information most used by Australians. This could include non-professional sources, like blogs, social media influencers or podcasters.

**Figure 2: Initial view of the news market**



Working with these 2 different views of the news market will allow us to identify any gaps where industry output and consumer demand are not aligned. Over the longer term, we anticipate that consumption data will also help us update and broaden the ‘supply-side’ indicators.

### Consolidation of content diversity indicators

Given the complexities of measuring content diversity, we have combined previous indicators – range of topics, range of viewpoints and local relevance – and created a new single indicator: range and variety of news content (indicator 4).

In line with stakeholder feedback, this indicator may be best illustrated by specific case studies focusing on key geographies or demographics, rather than a systemic assessment of news content across Australia.

### Potential future state

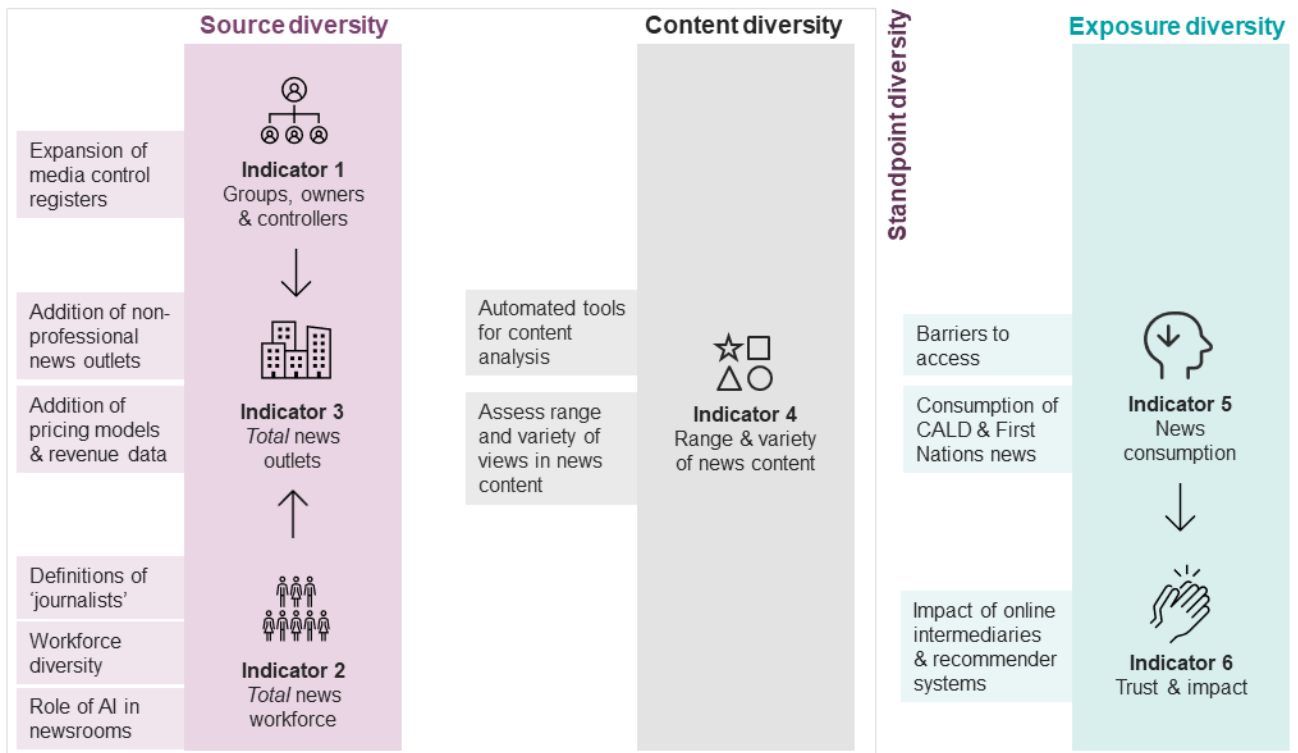
While Figure 1 provides an updated view of the current Media Diversity Measurement Framework, it is not intended to remain static.

Over time, the framework will be regularly reviewed and updated based on data gaps. This could involve examining new areas of supply and consumption of news in Australia.

A potential future state is illustrated below in Figure 3, providing an example of how the framework could evolve over time. In particular, we envisage a greater focus on standpoint diversity and research to understand the role of AI and other emerging technologies across the news media supply chain. However, the expansion of the framework and delivery of any new research projects will depend on resourcing and prioritisation discussions.



**Figure 3: Media Diversity Measurement Framework (potential future state)**









# Implementation considerations

## Existing data and research inputs

In addition to seeking feedback from stakeholders on the scope of the measurement framework, we also sought information about whether there were new or existing sources of data and research that could be relied upon to help implement the framework. A discussion of the key sources of data is below.

Table 1: Key sources of existing data and research

	Indicator 1: Groups, owners & controllers 	Indicator 2: Professional news workforce 	Indicator 3: Professional news outlets 	Indicator 4: Range & variety of news content 	Indicator 5: News consumption 	Indicator 6: Trust and impact 
ACMA	X		X		X	X
Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA)					X	
Australian Bureau of Statistics (ABS)		X				
Public Interest Journalism Initiative (PIJI)	X		X	X		
News and Media Research Centre (N&MRC)				X	X	X
Centre for Media Transition (CMT)				X		
Other		X	X	X	X	

### ACMA

The ACMA is already an important source of industry data relating to media diversity and the Australian news market. Most notably, our [media diversity and control registers](#) provide transparency about the make-up of media groups that control commercial broadcasting licences or associated newspapers, which is a key input for indicator 1. However, this dataset does not capture community, public, or subscription broadcasters, narrowcasters, digital news sources or any other non-regulated media outlets.

The ACMA's [annual consumer survey](#) is another important input. In anticipation of future news measurement work, we started asking survey respondents about their news consumption habits in 2022 and expanded these questions in 2023 to ask about their use of individual news sources. Preliminary results will be available by the end of 2023 and, in conjunction with the N&MRC annual Digital News Report and DITRDCA's TV and Media Consumption Survey, will help inform a detailed assessment of news consumption and impact (indicators 5 and 6). These results may also enable the ACMA to undertake a 'share of attention' assessment, based on Ofcom's proposed media plurality model.

#### Ofcom's proposed media plurality model

The UK [Measurement Framework for Media Plurality](#), released by Ofcom in 2015, served as a key point of reference for the ACMA when developing our 2020 paper. This framework is currently under review, with Ofcom [proposing a new metric](#) to assess the impact of news sources based on 'share of attention'.

This would measure an individual's attention to a specific news source as a share of their total engagement with all the news sources they use, replacing Ofcom's previous 'share of reference' assessment.

Ofcom and CMT both advocated for the ACMA to consider a 'share of attention' model when updating the framework. We will be exploring the feasibility of adopting this model based on the results of the 2023 annual consumer survey.

As part of our role in assessing and registering news businesses under the News Media and Digital Platforms Mandatory Bargaining Code (NMBC), we also maintain a [public register](#) of eligible news businesses that have applied and been registered under this scheme. As an assessment of 'core news' is part of this process, this register may serve as an additional (albeit limited) source of new information on sources of public interest journalism under the Media Diversity Measurement Framework.

Finally, regional commercial radio and TV broadcasters are required under the Broadcasting Services Act to keep records of local content broadcast, including local news, and to provide this information to the ACMA if required. This could be an additional source of data for the framework.

#### **Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA)**

For the last 3 years, DITRDCA has commissioned an annual Media Content Consumption Survey, which includes detailed information on the trends and behaviours of Australian news consumers at local/state, national and international scales. This research is being expanded upon in 2023 as part of a revised 'TV and Media Survey' and could be used to help examine aspects of exposure diversity, and the role of online news.

#### **Australian Bureau of Statistics (ABS)**

The Census is the primary source for Australian employment and labour data, based on the occupation and industry of the main job a person held in the week before the Census. The Census is held every 5 years and was last run in 2021.

Census data is a key input to indicator 2, showing the number of 'journalists and other writers' working in Australia. However, several stakeholders, including La Trobe University, cautioned against the use of existing ABS data to measure the news workforce, as there has been a fragmentation of journalists outside of newsrooms and

the existing job categories are too narrow and do not capture the breadth of work needed to produce professional news.

The ABS is currently consulting on the Australian and New Zealand Standard Classification of Occupations (ANZSCO) ahead of the 2026 Census. Some stakeholders have called on the ACMA to submit to this process and to actively advocate for re-defining the way journalists and other media professionals are categorised by the ABS, to reflect the changes in the labour force.

### **Public Interest Journalism Initiative (PIJI)**

As discussed in our consultation paper, PIJI provides an important source of data on the state of the Australian news market via its Australian Newsroom Mapping Project (ANMP), Australian News Index (ANI) and Australian News Sampling Project (ANSP).

In its submission, PIJI noted that it was well positioned to address 4 of the original 8 indicators and that, despite being established as a time-limited initiative, there was an ongoing and increasing demand for its input, analysis and research. In February 2023, the government announced a one-off commitment of \$900,000 to fund PIJI for 12 months under the News MAP initiative.

PIJI has continued to build on its news index, recently expanding the database to include business entity data obtained from the Australian Business Register and ASIC registers. This includes the entity name, entity type, ABN and business location for each news outlet. While not comparable to the detailed examination of ownership and control structures undertaken by the ACMA as part of our administration of the media control registers for regulated media entities, entity data for non-regulated entities would be useful in building on indicator 1.

PIJI also undertakes the highly resource-intensive work of sampling news availability in selected LGAs as part of its Australian News Sampling Project. This requires researchers to review and manually code a sample of news articles against a set of criteria, including their scope (local, national, international), whether they constitute public interest journalism, and topic (government, courts and crime, community, public services). PIJI's sampling project also reports on whether content is original or syndicated. PIJI's content analysis does not, however, capture TV or radio news due to a lack of access to broadcast transcription or archival services, and has called on the ACMA to assist in filling this gap.

### **University of Canberra's News and Media Research Centre (N&MRC)**

The N&MRC's annual Digital News Report (DNR) is part of a global study by Reuters Institute, examining news consumption trends by surveying 93,000 online news consumers across 46 markets. The DNR captures information about which platforms and news brands Australians most trust and rely upon, including use of social media platforms used for news.

The N&MRC, in partnership with SBS, also recently published a report on the role of representation and trust in the news media in fostering a sense of belonging and participation among multilingual audiences. This included a survey conducted in 5 language communities: Arabic, Cantonese, Italian, Mandarin and Vietnamese.

### **Centre for Media Transition (CMT)**

The University of Technology Sydney's Centre for Media Transition, in conjunction with the University of Sydney, undertook the Media Pluralism Research Project, which included examining methods to computationally evaluate levels of media pluralism using a specially designed tool to scrape, assess and classify a range of articles from online Australian news sites as either 'public affairs' or 'non-public affairs'.

While the tool currently relies on a static, historical dataset from 2019, CMT noted that with additional resourcing, the tool could be developed to run analysis based on current (live) content, and take the sub-classification beyond a genre analysis to include analysis of range of viewpoints.

### **Other**

A range of third-party datasets could be acquired to validate existing datasets and address targeted gaps at relatively low cost. These include:

- > Telum Media Database
- > AAP/Margaret Gee's Australian Media Guide
- > iSentia contact lists
- > Nielsen (for news consumption data)
- > Ipsos (for digital news tracking data)
- > OzTAM/RegTAM (for television ratings information).

## **Potential media diversity outputs**

The ACMA's Media Diversity Measurement Framework, as outlined in this document, provides a conceptual roadmap for ongoing research and analysis into the state of Australia's news media environment. It is a theoretical model, similar to Ofcom's [Measurement Framework for Media Plurality](#), relying on assessment and analysis of a 'bundle of metrics' to understand the state of media diversity.

To operationalise this framework, further research and analytical work will be required, potentially as part of a staged rollout. This work could be undertaken by the ACMA, by another research organisation, or through the collaboration of multiple government and non-government research entities.

### **Regular reporting series**

A regularly produced report series would serve as a valuable output of the Media Diversity Measurement Framework. Point-in-time data captured as part of this exercise would constitute a media diversity baseline, with these metrics to be tracked and monitored over time.

For this study, researchers could primarily draw upon existing research across the range of external data sources discussed above, including:

- > ACMA annual consumer survey
- > DITRDCA TV and Media Survey
- > PIJI Australian News Index and Australian News Sampling Project
- > N&MRC Digital News Report
- > CMT Media Pluralism Research Project.

Reporting could include case studies or standalone targeted research on topical issues relevant to the examination of media diversity in the Australian news market. The report series could also identify data gaps and future research priorities.

To track and monitor changes over time, it is important that researchers regularly review, update and report against the framework.

## Additional research projects

As part of the consultation, stakeholders proposed a series of research projects that could be undertaken by either the ACMA or other research organisations to build a better understanding of contemporary media diversity issues. Some of the ideas surfaced in this process are outlined below, for illustrative purposes. These align with the potential future state for the framework (Figure 3, above).

### Examining news consumption among under researched groups, such as culturally and linguistically diverse (CALD) households

While English is the dominant language of the Australian news industry, it is important that the framework captures the provision of news in languages other than English, as well as the consumption preferences and habits of CALD Australians. In addition to informing thinking on media diversity among groups that may not ordinarily be caught by general population research, this study could also help identify key sources of news and information used within these communities.

### Study into the impact of online intermediaries in news availability and consumption

While digital platforms (for example, Facebook) are not news publishers, they play a crucial role in determining how Australians receive, consume and share news. As part of an assessment of 'news impact', additional research could be undertaken into how intermediaries (and their recommender systems) prioritise news items and sources in users' feeds, and how digital platform users actively or passively consume news on these services.

### Exploring the impact of algorithms and generative AI tools on news media

Generative AI tools, including large language models, are playing an increasingly prominent role in newsrooms as tools for brainstorming, researching, data analysis and generating news content. For news businesses, they offer a means of reducing labour costs or increasing productivity, while news workers may see them as a means for working more efficiently or as a direct threat to their livelihood. A project looking into the adoption of AI tools by newsrooms could provide valuable insights into the future of news production in Australia.

### Assessing tools to automate news content analysis

Counting and classifying news articles manually is labour-intensive. For this reason, PIJI relies on a sampling approach to assess the proportion of 'public interest journalism' available in local news markets. An alternative is using a computational tool to automatically classify news content. A project to test the capabilities of off-the-shelf AI tools (including those used by CMT) would be valuable for understanding if this technology could be relied upon for automating the process of content analysis. If comparable results can be achieved to that of coding done by human researchers, a broader assessment of content diversity may be achievable at scale.

# Recommendations

This paper serves as the ACMA's advice to government on the Media Diversity Measurement Framework and its potential implementation, as requested by the Minister for Communications, the Hon Michelle Rowland MP.

While primarily intended to inform government considerations regarding the next stages of this work, the paper has been drafted with a view for public release. This would provide stakeholders with an update on what changes have been made to the revised framework and how their views have been addressed.

**Recommendation 1:** The government releases the ACMA's advice on the outcomes of public consultation and the revised Media Diversity Measurement Framework.

There has been a considerable growth in recent years of publicly available data on different aspects of the Australian news market. While this research is highly valuable, no single source seeks to provide a complete picture on the increasingly complex state of media diversity in Australia.

As an initial output, the ACMA proposes publishing a Media Diversity Measurement report, bringing together existing primary and third-party data, research and analysis to examine the state and health of the Australian news market through the lens of the framework's 6 media diversity indicators.

This report would form the basis of a new regular ACMA reporting series, to be produced every 2 years. These public reports would assist the government, industry and other key stakeholders in seeing how the news market is trending against key diversity metrics. This series would also provide an opportunity to regularly examine and update the measurement framework, identify new sources of data and research, and examine outstanding data or information gaps.

**Recommendation 2:** The government agrees to the ACMA developing a regular Media Diversity Measurement report series (from the end of 2024, and every 2 years after), examining the state of the Australian news market, using the revised framework and existing data. This report series will also look to review and evolve the framework over time.

As part of the ACMA's new reporting role into the state of media diversity, it will be important to ensure key sources of research and data relied upon for this analysis are maintained and updated.

The ACMA has well-established data and research capabilities which, over time, could expand to build or take carriage of key news measurement datasets, including commissioning new research projects to address data gaps that emerge. This would provide the Media Diversity Measurement Framework with greater consistency and certainty over the longer term.

**Recommendation 3:** To support the development of the Media Diversity Measurement report series, the government agrees that the ACMA should build or take carriage of key datasets on the news market. This could also include the commissioning of new research projects to address identified data gaps and expand the framework over time.

To understand the state of media diversity in a contemporary media environment, it is critical to assess news output, including classifying the types and variety of news being produced. Ideally, over the longer term, this would include an examination into the extent to which news outlets present a diversity of viewpoints.

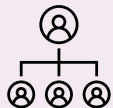

However, we note the sensitivity around a media regulator undertaking such an assessment and agree with stakeholder views that this work is best undertaken at arms' length from government. As such, the ACMA will explore the feasibility of content diversity assessments under the Media Diversity Measurement Framework to be completed by independent researchers.


**Recommendation 4:** To address concerns about the ACMA assessing the content or quality of news output, the government agrees that the ACMA consult further with academic and other research organisations on their capacity to undertake content diversity assessments (including through automated means) and reports back on the feasibility and cost of outsourcing this component of the Media Diversity Measurement Framework.






# Appendix A: Media Diversity Measurement Framework

As at August 2023

	Indicator	Key question	Initial metrics	Existing data	Data gaps & challenges	Potential work to address gaps
Source & content diversity (supply-side factors)	 <p><b>1. Groups, owners &amp; controllers</b></p>	Who owns and/or exercises control over media groups and outlets producing professional news and opinion in Australia?	<ul style="list-style-type: none"> <li>&gt; Count of the number of media network owners (and, if available, controllers) of all professional news outlets across media platforms in Australia.</li> </ul>	<ul style="list-style-type: none"> <li>&gt; ACMA media control registers.</li> <li>&gt; PIJI business entity data (as part of Australian News Index).</li> </ul>	<p>Current ACMA media control registers only capture licensed broadcasters and associated newspapers and are assessed based on voices in a licence area (not LGAs).</p> <p>Controllers would be very difficult to ascertain for smaller, private, or non-commercial print and digital news outlets. There is no legislative basis for ACMA to collect or compel this information.</p>	<p>Short term:</p> <ul style="list-style-type: none"> <li>&gt; Examine feasibility and challenges of broader media diversity and control assessment.</li> </ul> <p>Long term:</p> <ul style="list-style-type: none"> <li>&gt; Inform government considerations as to whether the media control registers need to be expanded and/or whether licence areas remain meaningful if digital news is captured under future media diversity reforms.</li> </ul>
	 <p><b>2. Professional news workforce</b></p>	How many journalists, editors, and other media professionals currently contribute to the production of professional news in Australia?	<ul style="list-style-type: none"> <li>&gt; Count of journalists, editors and other key media professionals employed by news outlets operating in Australia and directly contributing to the production of professional news.</li> <li>&gt; Additional data is to be sought on employment type (e.g., full-time, part-time and casual) and primary location of newsroom, where possible.</li> </ul>	<ul style="list-style-type: none"> <li>&gt; ABS Census data.</li> </ul>	<p>Current ABS data is not fit for purpose, as it is too narrow and does not capture the breadth of work needed to produce professional news.</p> <p>Understanding changes to the journalism labour force will become an increasingly important metric to track over time, given developments in generative AI.</p> <p>There are concerns within industry about tracking this metric on both privacy (particularly for small, regional newsrooms) and commercial grounds. There are also challenges in capturing freelance journalists.</p>	<p>Short term:</p> <ul style="list-style-type: none"> <li>&gt; Examine journalism industry definitions and consider advocating for changes as part of current ABS consultations on ANZSCO changes.</li> </ul> <p>Long term:</p> <ul style="list-style-type: none"> <li>&gt; Request information about journalism staffing numbers directly from news businesses (e.g., via voluntary survey/audit), including information on diversity of workforce.</li> </ul>

Indicator	Key question	Initial metrics	Existing data	Data gaps & challenges	Potential work to address gaps
 <p><b>3. Professional news outlets</b></p>	<p>How many Australian news outlets are currently producing professional news and opinion?</p>	<ul style="list-style-type: none"> <li>&gt; Count of all 'news businesses' that operate in Australia and provide 'core news' (as per NMBC definitions).</li> <li>&gt; For each news source identified, additional data is to be sought on:               <ul style="list-style-type: none"> <li>&gt; publication platform(s) (print, TV, radio, website, app, podcast, social media)</li> <li>&gt; frequency of reporting (where relevant) (daily, weekly, bi-weekly, monthly)</li> <li>&gt; news entity</li> <li>&gt; focus of news reporting (general, local/community, multicultural, special interest, etc)</li> <li>&gt; geographic scale.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>&gt; PIJI Australian News Index.</li> </ul>	<p>PIJI's news database covers most metrics, however, does not capture pricing strategy or the focus of news coverage.</p> <p>Many community radio stations are not tracked by PIJI, nor podcasts (noting some would not fall within scope of 'professional news'). It is also currently unclear the extent to which PIJI covers multicultural and special interest news.</p> <p>There is strong support for aligning work with NMBC definitions, but it is currently unclear how ACMA would determine 'professional news' without resource intensive reviews of individual pieces of content.</p>	<p>Short term/scoping:</p> <ul style="list-style-type: none"> <li>&gt; Validate current PIJI data against commercial sources/news databases.</li> <li>&gt; Consult with PIJI about its plans to address data gaps.</li> </ul> <p>Long term:</p> <ul style="list-style-type: none"> <li>&gt; Request information directly from news businesses to address outstanding gaps in database.</li> <li>&gt; Explore opportunities for accessing revenue data.</li> </ul>

Indicator	Key question	Initial metrics	Existing data	Data gaps & challenges	Potential work to address gaps
 <p><b>4. Range &amp; variety of news content</b></p>	<p>How much variety is present in professional news and opinion in Australia?</p>	<ul style="list-style-type: none"> <li>&gt; Identify an appropriate cross-section of professional news sources, across different platforms, localities and target demographics, and assess a sample of content to determine:               <ul style="list-style-type: none"> <li>&gt; category or news topic</li> <li>&gt; number of core and covered articles, as a % of total news output</li> <li>&gt; degree of localism (where relevant).</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>&gt; PIJI Australian News Sampling Project.</li> <li>&gt; CMT Media Pluralism Research Project classifier tool.</li> </ul>	<p>PIJI is partly undertaking this work by sampling content in selected LGAs. PIJI's assessment does not capture TV or radio news due to a lack of transcription services.</p> <p>Local, regional and community news is increasingly centralised, with little visibility about how much news content is about, or relevant to, the locality.</p> <p>Content analysis is highly resource-intensive and raises concerns around the subjectivity of assessors.</p>	<p>Short term:</p> <ul style="list-style-type: none"> <li>&gt; Explore potential to leverage existing NMBC assessment process in some capacity.</li> </ul> <p>Long term:</p> <ul style="list-style-type: none"> <li>&gt; Scope potential for in-house natural language transcription service (for broadcast news), and algorithmic content analysis for topic/relevance of a story to a specific locality.</li> </ul>
<p style="writing-mode: vertical-rl; transform: rotate(180deg);"><b>Exposure diversity (demand-side factors)</b></p>  <p><b>5. News consumption</b></p>	<p>What are the most consumed sources of news in Australia?</p>	<ul style="list-style-type: none"> <li>&gt; List of most popular cross-media sources of news by audience size and frequency of use (including international sources, and non-professional sources).</li> </ul>	<ul style="list-style-type: none"> <li>&gt; ACMA annual consumer survey (2022 and 2023).</li> <li>&gt; N&amp;MRC annual Digital News Report.</li> <li>&gt; DITRDCA Media Content Consumption Survey.</li> </ul>	<p>Existing consumption data is split across multiple sources (e.g., N&amp;MRC, Nielsen, ACS) but it remains difficult to assess the popularity of news outlets across platforms.</p> <p>News consumption patterns appear to differ among culturally and linguistically diverse (CALD) communities, with a greater reliance on international sources and digital platforms.</p>	<p>Short term/scoping:</p> <ul style="list-style-type: none"> <li>&gt; Include new questions in ACMA annual consumer survey, to enable assessment of consumption across platforms by source.</li> <li>&gt; Commission tracking to validate and build on ACS results.</li> <li>&gt; Consult with N&amp;MRC and Ofcom on leveraging existing research.</li> </ul> <p>Long term:</p> <ul style="list-style-type: none"> <li>&gt; Undertake standalone qualitative research on:               <ul style="list-style-type: none"> <li>&gt; CALD Australians news availability and consumption</li> <li>&gt; First Nations Australians' news availability and consumption.</li> </ul> </li> </ul>

Indicator	Key question	Initial metrics	Existing data	Data gaps & challenges	Potential work to address gaps
 <p><b>6. Trust &amp; impact</b></p>	<p>What are the most impactful sources of news in Australia?</p>	<ul style="list-style-type: none"> <li>&gt; List of most popular cross-media sources of news by stated reliance, trust or personal importance (including international sources, and non-professional sources).</li> </ul>	<ul style="list-style-type: none"> <li>&gt; ACMA annual consumer survey (2023) – share of reference.</li> <li>&gt; N&amp;MRC annual Digital News Report – findings on trust.</li> </ul>	<p>While many (particularly younger) Australians note they rely on social media for news and information, it is unclear what sources they are consuming, and the extent to which they are actively seeking out this content or being provided content.</p>	<p>Short term:</p> <ul style="list-style-type: none"> <li>&gt; New questions in ACMA's 2023 annual consumer survey to enable construction of share-of-attention metric.</li> </ul> <p>Long term:</p> <ul style="list-style-type: none"> <li>&gt; Examine impact and influence of digital platforms on news consumption and trust.</li> </ul>