

**Supplementary written evidence submitted by Better Media**

**Email from Dr Rob Watson, Better Media, 29 June 2023**

I've been following the discussion of the Communication Media and Sport Committee in regard to the Media Bill on behalf of Better Media.

I'm prompted to ask if it is possible to add an addendum to our submission, based on the nature of the evidence that has been given to yourself and the committee members regarding the prominence of radio services in electronic programme guides.

Our concern is that the committee is not hearing evidence from representatives of organisations, including Ofcom and the BBC, that are advocating on behalf of and in the interests of minority communities.

For example, Richard Stern giving evidence on behalf of Tuneln (27th June 2023), stated that "The market has been self-organising to this point and it has operated efficiently. If there are issues with the operation of the market, if there is customer harm, or if there is broadcaster harm, we should study what it is and develop solutions to address that. I am not aware of what those are yet. I have not seen the harm that has come from the growth that we have talked about to this point. Again, consultation has been slight. Maybe that harm has been presented but I think that it would be better to do this transparently and openly."

This statement is somewhat alarming, given the evidence that Ofcom has submitted which indicates that they have no significant concerns about the operation of this market as it might affect minority media providers, such as ethnic-minority radio stations. Better Media is concerned that there has been little consideration given to the impact of these proposals on minority communities and people of protected characteristics, as determined by the Equality Act 2010.

Given the evidence that has been presented to the committee so far, we are concerned that there is not sufficient consideration being given to people from minority communities in these discussions.

To assume that the media market is self-regulating and self-organising, as Richard Stern indicates, fails to consider that many minority communities face significant barriers to access these online platforms, either because of costs, technical complexity, language differences, or the logistical complexity of maintaining streaming services across multiple platforms.

We note that the BBC and the large commercial operators are able to procure their own apps and online systems to control their content and the data that they receive from their use, but small media operators representing minority communities do not have the same capacity to provide these systems.

Similarly, there does not seem to have been any consideration given by Ofcom as the communications regulator acting in the interests of citizens and consumers, as to how these systems are deployed and used for the benefit and advancement of minority communities or people defined by their protected characteristics.

Ofcom's passive approach to evidence gathering, it seems, is out of step with their duties under the Equality Act. We believe this is leaving the committee with a less than adequate overview of the needs of minority communities in the broadcasting economy.

We would hope to be able to present our concerns to you and the committee in person, but if not, we would appreciate this concern being added as a written statement.

Dr Rob Watson  
On behalf of Better Media