

# Transparency of Media Ownership

## Country Case Studies

Here you might find case studies for five different countries – Austria, Croatia, Georgia, Norway and United Kingdom – analysing media ownership transparency, both in law and in practice.

### AUSTRIA

#### IN LAW

Is media ownership transparent?	
In law:	YES
In practice:	YES

According Media Law, as amended in 2011, it is possible to find out who owns print, online and broadcast media through information reported directly to the public. All media must disclose directly to the public enough information for their real owners to be identified, including information on all shareholdings, beneficial owners back to a real person and those with indirect interests and control.

Information reported to the media authority, the Austrian Communications Authority (KommAustria), under the Audiovisual Media Services Act or Private Radio Broadcast Act will also reveal ownership of the broadcast media.


#### **Background**

Greater transparency of media ownership came about as a bi-product of another law, the Media Transparency Act. This was introduced in late 2011 following years of concern about the amount of money state bodies spent on advertising in the media, in return for positive news coverage. The Media Transparency Act creates a public database to which all public bodies must report twice a year all subsidies, financial aid, grants and awards of advertising funds above EUR 1,000 to media outlets. The original draft of the law made no reference to the need for transparency of media ownership and, despite considerable consultation with state bodies, media outlets and associations, it was only very late in the drafting process that this need was identified. Amendments to the Media Law requiring disclosure of ownership to the public were introduced and passed by Parliament in the space of a few weeks in December 2011.

#### IN PRACTICE

A review of the websites of 11 print and five broadcast media in late 2014 revealed that broadly speaking the 2011 amendments to the Media Law are being complied with and full ownership information for the media is available online. Two of the broadcast media reviewed failed to disclose any information and three of the print media complied partially, each of them failing to disclose shareholders' indirect interests in other companies.

This latter omission may be connected to a lack of clarity in one part of the Media Act which was not amended in 2011; the 2011 amendments require all direct and indirect ownership to be identified, back to a real person, irrespective of the size of the shareholding, as well as trusts and silent partnerships. However



it is not clear whether *all* direct and indirect interests of shareholders *in other media companies* must be disclosed or just where they have a 100% direct shareholding.

### **The practicalities of reporting ownership**

Greater ownership reporting requirements place further demands on both the media and the media authority. In order to find out how the requirement to report ownership information works in practice, interviews were carried out with one weekly magazine, one regional media company (which owns both print and broadcast media) as well as the media authority, the Austrian Communications Authority (known as KommAustria), to find out how they manage ownership information in practice.

#### **Media Authority**

KommAustria is the body charged with collecting ownership information for broadcast media under the Audiovisual Media Services Act and the Private Radio Broadcasting Act. Broadcast media have been required to report ownership information to Komm Austria since the airwaves were opened up to private operators. The 2011 amendments to the Media Law requiring all media to disclose information to the public has not therefore significantly impacted on KommAustria's work in this area.

The work is carried out by the legal department of the Austrian Regulatory Authority for Broadcasting and Telecommunications (RTR), a body which provides operational support to KommAustria. It is estimated that less than one full time staff person (out of a staff of 108 full time equivalents at RTR) works on tracing and documenting ownership issues. Ownership information is submitted in hard or electronic copy.

RTR staff proactively review the ownership structures of a media outlet when they learn from media reports that there have been relevant changes or if they have not interacted with a media outlet for a long time. Approximately one media outlet per month is fined for failing to comply with the ownership disclosure requirements. These are usually smaller media outlets which do not have staff dedicated to complying with regulation and which forget to report changes. The fines are up to EUR 4,000 and, in theory, repeated violations could result in the licence being withdrawn but this has never happened.

#### **Media**

Within the large media company interviewed, ownership information is managed by its legal department, in direct collaboration with each of the various media outlets it owns. The information is checked quarterly and the published information supplemented as appropriate. It is estimated to take around 160 hours per year to manage this information which represents around 10% of one full time person, out of a workforce of around 3000 staff.

For the smaller weekly magazine (which has a staff of around 70), the Chief Executive Officer manages the ownership reporting but this is not seen as very time consuming either; when the amendments to the Media Act came into force in mid-2012, it took about an hour to collect and publish the relevant information and no work has been needed since then. The information needed for the disclosure is easily accessible in various formats, including electronically.

Both companies view disclosure of ownership information positively and believe the system works well. Neither of them is aware of any sanctions being imposed for a failure to comply with the law. The increased level of disclosure required through the amendments to the Media Act is perceived to create greater transparency, particularly as information must now be up-to-date and not just published annually, as was the case previously. They view this as important to create trust and support from society. Public disclosure of ownership information also makes a company's life easier as it removes the need for the public to request ownership information directly.

Neither company is aware of any controversy over the more detailed reporting requirements or any concerns about further regulation of the media prior to the law being passed.

## RELEVANT LEGISLATION

Law	Media covered by law
Audiovisual Media Services Act, Official Gazette 84/2001, as amended	TV
Private Radio Broadcasting Act, Official Gazette 20/2001, as amended	Radio
Federal Law of 12 June, 1981 on the Press and other journalistic Media (Media Law)	Print, broadcast and online media
Media Transparency Act, Official Gazette 125/2011	n/a

## INFORMATION SOURCES

Access Info full country research: [http://www.access-info.org/documents/Access\\_for\\_Rights/Media\\_Transparency/tmo\\_austria\\_17july2013.doc](http://www.access-info.org/documents/Access_for_Rights/Media_Transparency/tmo_austria_17july2013.doc)

## CROATIA

### IN LAW

Is media ownership transparent?	
In law:	YES
In practice:	NO

According to amendments to the Media Law (2011) and the Electronic Media Law (2012), it is possible to find out who owns print, broadcast and online media in Croatia through information reported to: the relevant media authorities; directly to the public; or to corporate /trade registers. Through the various laws media must disclose enough information for their real owners to be identified right back to the individual, not just to a company. This includes information on the all shareholdings over 1%, disclosure of beneficial owners and those with indirect interests and control and a ban on “secret” ownership.

### Background

In June 2011, concerns about suspicious financing of the media led to calls for changes to the law to allow identification of media owners back to an individual. The process of privatising the print media in Croatia, which had begun in 2000, had been rife with corruption scandals, with rumours of money laundering and disguised ownership of certain groups involved in criminal activities surrounding the sales of the biggest Croatian print media – *Jutarnji list*, *Večernji list* and *Slobodna Dalmacija*. The real ownership structure of the media was often hidden behind secret contracts and far-reaching informal agreements involving high-profile individuals, such as politicians, police and public prosecutors.

As a result, amendments to the Media Act and the Electronic Media Act were drafted very quickly and passed with minimal consultation by the Parliament in July 2011 (Media Act), with the same provisions being introduced to the Electronic Media Act in June 2012.

## IN PRACTICE

Despite some well-defined provisions, the speed with which the amendments to the Media Act and Electronic Media Act were passed and the lack of consultation has resulted in serious omissions in the monitoring and enforcement side to the law. For example:

- Media companies do not always publish information on indirect ownership yet there is no institution authorised by the Media Act to monitor compliance and to apply sanctions.
- The obligation to report ownership rests with the media outlet itself yet the media outlet cannot be certain that a person formally entered into its company shareholder register is the actual shareholder.
- The supervisory body, the Croatian Chamber of Economy (CCE), is not provided with sufficient resources adequately to monitor compliance or check information.

The amendments have had little impact on the ownership structure of Croatian media thus far since most of the privatisation processes, many of which were reported to be suspicious or controversial, were completed before 2011. In the absence of an effective enforcement mechanism, there have been no legal proceedings and the questionable ownership structures remain.

### **The practicalities of reporting ownership**

Greater ownership reporting requirements place further demands on both the media and the media authority. In order to find out how the requirement to report works in practice, interviews were carried out with one regional broadcast media outlet, two large national newspapers and the Croatian Chamber of Economy (CCE) which manages the ownership reporting under the Media Act, to find out how they manage ownership information in practice.

#### ***Media Authority***

Within the CCE, the responsibility for gathering, storing and disclosing ownership information lies with two employees who are estimated to each spend around 20% of their time on this work, with busier periods twice a year around reporting deadlines. Thus the total for a whole year is around 50% of one employee. Their tasks include advising media on how to complete the relevant forms, processing and storing the submitted forms. If compliance with the law also fell within the CCE's remit, then this time might double but still would not be more than about one full time person.

Ownership information must still be reported in hard copy, as well as electronically. The CCE reports that the process could be significantly streamlined if it all became digitised with online submission of information, to be stored in an electronic database.

#### ***Media***

The obligation to report ownership information to the CCE (Media Act) or the Electronic Media Council (EMC) (Electronic Media Act) lies with media outlets themselves. They are, therefore, required to collect and report information from their shareholders on an annual basis and when changes take place.

Prior to the 2011/2012 changes to the ownership reporting requirements, all media were already covered by (less detailed) ownership reporting obligations in the Media Act, so the concept of all media outlets having to report their ownership information was already accepted in Croatia. All our interviewees – from broadcast or print media – supported the idea of reporting ownership, calling it “normal thing” and stating that that “the continuous obligation to report media ownership information prevents fraud” if the law is

executed effectively. The two large national newspapers that were interviewed both expressed the view that the public need to know who owns the media in the interests of transparency.

The 2011/2012 changes to the law are simply an extension of an existing obligation. Although the new provisions are more time-consuming to implement, our respondents all reported that the time commitment for reporting ownership is negligible. Individual changes in ownership can take as little as 5 minutes each to submit (there are relatively few changes), whilst the annual report takes around half a day. The same information is provided directly to the public via website and the Official Gazette and takes a further 1 hour or so per year.

## RELEVANT LEGISLATION

Law	Media covered by law
Media Act, May 2004, as amended July 2011	Print, broadcast & online media
Electronic Media Act, December 2009, as amended June 2012	Broadcast & online media
Companies Act, November 1993 Court Register Act, January 1995 Capital Market Act, July 2008	Print, broadcast & online media

## INFORMATION SOURCES

Official web page of the Electronic Media Agency <http://www.e-mediji.hr/>

**Access Info** - Croatia media ownership law and practice research questionnaire: [http://www.access-info.org/documents/Access\\_for\\_Rights/Media\\_Transparency/tmo\\_croatia\\_17july2013.doc](http://www.access-info.org/documents/Access_for_Rights/Media_Transparency/tmo_croatia_17july2013.doc)

## GEORGIA

### IN LAW

According to the law, it is possible to find out who owns broadcast media only in Georgia through information reported to the media authority, Georgian National Communications Council (GNCC), and directly to the public. As a result of amendments to the Law on Broadcasting in 2011, broadcast media must disclose enough information for their real owners to be identified. This includes information on the size of shareholdings, beneficial owners and those with indirect interests and control. Ownership of broadcast media by offshore companies was a central amendment to the law.

Is media ownership transparent?	
In law:	YES FOR BROADCAST MEDIA ONLY
In practice:	YES

Information on the ownership of print and online media ownership is only available through provisions of corporate law and as such it is not easy to identify the real owners.

### **Background**

For many years prior to 2011, the lack of transparency of media ownership had been of great concern in Georgia. The leading national broadcasters, including the public service broadcasters, were seen as mouthpieces of government and their real owners were hidden behind offshore companies. Despite the fact that the public was easily able to identify the biased, pro-governmental information disseminated by the broadcast media, there was a determination within civil society to get the law amended to ban offshore ownership and to oblige broadcast media to disclose beneficial owners.

Following a campaign by Georgian civil society, with support from local and international donor organisations and foreign diplomats, in 2011 the Law on Broadcasting was amended to introduce greater transparency provisions and ban offshore companies from owning broadcast licences. The ownership information, which is submitted to the media authority, the GNCC under the law, must also be made public via the websites of both the broadcaster and the GNCC.

### **IN PRACTICE**

A 2014 Transparency International report<sup>1</sup> on the ownership of more than 20 broadcast, print and online media outlets found that media ownership is now largely transparent in Georgia. This is in line with the GNCC view that media outlets generally report accurately.

Although some owners still have links to the ruling or opposition political parties, the situation has improved substantially since before 2011. There is now only one known case of media shareholders hiding their involvement behind an offshore shell company.<sup>2</sup>

The biggest challenge facing the GNCC in supervising the law is the lack of available information about whether media owners hold positions in government bodies; there is no unified list of government officials and only senior officials have to complete an asset declaration which is publically available on the website of the Civil Service Bureau.<sup>3</sup> In 2013 the GNCC identified one case where there was a conflict of interest.

Despite the fact that offshore ownership is banned, the law cannot prevent so-called “frontman” ownership. Although national broadcasters must submit some financial information to the GNCC, this information is mostly limited to summary conclusions which usually paint a very positive picture. Full financial transparency would help identify those financing the media; there were proposals from civil society lawyers at the drafting stage of the amendments to the Law on Broadcasting proposing that broadcasters should prepare their accounts in accordance with the International Accounting Standards (IAS). There is a rule that all companies must do this but it is not complied with or enforced, hence campaigners for ownership transparency wanted the GNCC to enforce this rule with respect to the broadcasters. The Parliament refused to enact this amendment, however.

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<sup>1</sup> Who owns Georgia’s media: Power networks and corporate relationships behind Georgian media outlets  
<http://transparency.ge/en/node/4126>

<sup>2</sup> Who owns Georgia’s media: Power networks and corporate relationships behind Georgian media outlets  
<http://transparency.ge/en/node/4126>

<sup>3</sup> <https://declaration.gov.ge/eng/question>

As in many countries, the obligation to report ownership rests with the media outlet itself yet the media outlet cannot be certain that a person formally entered into its company shareholder register is the actual shareholder.

### **The practicalities of reporting ownership**

Greater ownership reporting requirements place further demands on both the media and the media authority. In order to find out how the requirement to report works in practice, interviews were carried out with one national broadcaster, one newspaper, one online paper, one regional broadcasting association as well as the media authority, the GNCC, to find out how they manage ownership information in practice.

### **Media Authority**

As the body charged with collecting ownership information under the Law on Broadcasting, the GNCC only covers broadcast media which currently total 61 broadcast media outlets. The responsibility for gathering, storing and disclosing ownership information lies with three employees within the administrative and broadcasting regulation departments. The information is submitted in paper or electronic format. Uploading the information submitted by media, along with any relevant decisions adopted by the GNCC, onto the GNCC website takes approximately 10 minutes per document.

The GNCC regularly checks the information provided by the media outlets for compliance with the law and issues warnings and sanctions for breaches. The GNCC views the current law as quite progressive but identified some problems related to the proper implementation of the law in practice.

### **Media**

In larger media outlets, ownership information on shareholdings is collected, stored and disseminated to the GNCC and public by legal or business departments. It is stored within the media outlet in both paper and electronic format and takes very little time to process. Small regional broadcasters cannot afford to have dedicated departments dealing with ownership reporting requirements so these tasks are undertaken by directors or financial managers. Changes in ownership are not common at the regional level which means there is just the annual report to submit and this takes relatively little time meaning that reporting is not onerous.

The requirement to report ownership information was generally felt to be beneficial since it demonstrates the media outlet's lack of bias and impartiality and increases the trust of the population in the media. One media outlet reported that it has helped the public identify "de facto owners" of media even when there is "front man" ownership. It is perceived as a normal part of running a business and none of the media reported any negative views on the requirement.

### **RELEVANT LEGISLATION**

<b>Law</b>	<b>Media covered by law</b>
Law on Broadcasting (23 December 2004, Law no. 780)	Broadcast media (including cable and service providers)
Law on Entrepreneurs, 28 October 1994, as amended, No. 557	Commercial print, broadcast and online media
Civil Code, 26 June 1997, as amended, Law No. 786	Non-commercial print, broadcast and online media

## INFORMATION SOURCES

**Georgian National Communications Commissions (GNCC)** – information reported by media outlets can be found at: [http://gncc.ge/index.php?lang\\_id=ENG&sec\\_id=50051](http://gncc.ge/index.php?lang_id=ENG&sec_id=50051)

**National Public Registry Agency** – <https://enreg.reestri.gov.ge/>

The website of the NPRA, which is a public authority which is responsible for registering business and non-for-profit entities, contains information on companies (not just media) and sole traders.

**Transparency International website** which contains corporate information *in English* which is taken from the Business Registry run by the NPRA - [www.companyinfo.ge](http://www.companyinfo.ge)

**Access Info full country research:** [http://www.access-info.org/documents/Access\\_for\\_Rights/Media\\_Transparency/tmo\\_georgia\\_5aug2013.doc](http://www.access-info.org/documents/Access_for_Rights/Media_Transparency/tmo_georgia_5aug2013.doc)

## NORWAY

### IN LAW

Is media ownership transparent?	
In law:	YES
In practice:	NO

According to the law, it is possible to find out who owns print, broadcast and online media in Norway through information reported to the Norwegian Media Authority. Under the 1997 Media Ownership Act, on the request of the Norwegian Media Authority, all media must report sufficient information for their owners to be identified. It should be noted that, in common with Luxembourg and the UK, the Norwegian law does not specify exactly what information should be reported but rather relies on the media authority to request of the media the information it deems necessary. In practice in Norway this will include all the key information required to identify an owner back to a company – not necessarily back to an individual. This would include information on the size of shareholdings, beneficial owners and those with indirect interests and control. This information is made public by the Norwegian Media Authority on its website.

### Background

A parliamentary Green Paper published in 1995<sup>1</sup> stated that there was a trend towards concentration of media ownership. Despite the strongly-held view in Norway that government should not intervene in issues of media ownership on the grounds of freedom of expression, this increasing concentration of ownership was of concern since this in itself can be an obstacle to media freedom and diversity. As a result, the Media Ownership Act was adopted by Parliament in 1997. The new law represented a significant change; prior to 1997 only one television station (TV2) and one radio station (P4) were regulated and thus required to report ownership information. As a result of the act *all* media, including print and online, were required to report.

Media ownership issues are regularly discussed in the media; in the debate surrounding the introduction of the Media Ownership Act, there were no objections raised about the principle of all media reporting.



## IN PRACTICE

In general, it is possible to obtain ownership information via the Norwegian Media Authority in practice although the information published on the website only reveals ownership back to a company, not to a real person.

The law also requires media to report sources of revenue. With regard to other sources of financing, such as sponsorship, all the “established” media are members of the Norwegian Press Organisation<sup>i</sup>, and as such have taken upon themselves to respect the Norwegian Press Organisations Code of Journalistic Ethics, according to which the readers/listeners/viewers shall be informed of any third party financing, directly or indirectly, of editorial content. This does happen in practice so, for example, when a sponsor or commercial partner is involved in financing of a specific editorial product, this is publicised.

### **The practicalities of reporting ownership**

Greater ownership reporting requirements place further demands on both the media and the media authority. In order to find out how the requirement to report works in practice, interviews were carried out with one Norwegian newspaper, as well as the Norwegian Media Authority, to find out how they manage ownership information in practice.

### ***Media Authority***

The management and monitoring of media ownership reporting requirements under the Media Ownership Act falls within the job description of four (out of 50) employees within the Media Authority. They each spend approximately 10% of their time working on ownership information so the total time is therefore about 40% of a full-time person. One person registers information received via the media’s annual web submissions and continually updates information based on media monitoring whilst the other three write up the annual ownership report to the Department of Culture and carry out outreach, giving presentations and so forth. Information is only double checked if it does not make sense. They might also add to the Media Authority website other relevant information from the corporate annual reports in public registers and data from the Norwegian Media Businesses Association (MBL), the National Association of Local Newspapers (LLA) and TNS Gallup.

### ***Media***

Ownership information for the newspaper interviewed is reported by the Managing Director in collaboration with an employee of the parent company. This is carried out annually in January, via the Media Authority’s web form.

The newspaper sees three main benefits to disclosing ownership information: (i) it is a prerequisite for receiving press support from the government; (ii) it makes it clear to the public where their affiliations lay or alternatively demonstrates independence. They receive many requests for information about ownership, demonstrating the demand. These come from advertising agencies and the general public, especially in the two cities where local editions of the paper have recently been launched. The main drawback of reporting ownership for smaller media is that it makes them less attractive for advertisers if they are not part of the largest media groups.

Although the law does not require media to publish ownership information directly to the public, the newspaper does this voluntarily via Wikipedia.no.

## RELEVANT LEGISLATION

Law	Media covered by law
The Media Ownership Act – Act of 13/6-1997 number 53	Broadcast, print and online media
The Limited Companies Act of 13/6-1997 number 14	Broadcast, print and online media
The Public Limited Liability Companies Act of 13/6-1997-45	Broadcast, print and online media

## INFORMATION SOURCES

**Access Info** – Norway media ownership law and practice research questionnaire: [http://www.access-info.org/documents/Access\\_for\\_Rights/Media\\_Transparency/tmo\\_norway\\_17july2013.doc](http://www.access-info.org/documents/Access_for_Rights/Media_Transparency/tmo_norway_17july2013.doc)

Media Register, Norwegian Media Authority <http://medietilsynet.no>

Register of Business Enterprises - <http://brreg.no/english/registers/business>

## UNITED KINGDOM

### IN LAW

Under the Broadcasting Act 1990 and Communications Act 2003 it is possible to find out who owns the broadcast media through information reported to media authority, the Office for Communications (Ofcom). The law does not state what information should be disclosed but leaves it to the discretion of Ofcom to request all the information it deems necessary. In practice this may include information on the size of shareholdings, beneficial owners and those with indirect interests and control if Ofcom requests such information.

These requirements *do not* apply to newspaper publishers unless the owners also hold a regional TV broadcasting licence in which case rules limiting cross-media ownership may apply. Online broadcasters are not typically regulated by Ofcom. Limited ownership information for print and online media can be obtained from the companies register (Companies House), under company law.

Is media ownership transparent?	
In law:	YES FOR BROADCAST MEDIA ONLY
In practice:	NO

## **Background**

UK laws covering disclosure of ownership by the media have largely been motivated by concerns about maintaining competition in the marketplace by preventing media concentrations and ensuring new entrants are not excluded from the market. Behind the competition rules lies the principle that true plurality requires choice and the ability for consumers to make informed decisions. The Broadcasting Act of 1990 was seen as a “Thatcherite” law which heralded “a massive expansion in choice”. Hence the UK’s media authority, Ofcom, checks ownership information submitted to it for the purposes of assessing whether a media outlet is violating laws limiting media concentrations in order to maintain that choice.

## **IN PRACTICE**

Although media may report all the information needed to identify the real owners, obtaining that information for the general public is not easy. The law does not require Ofcom to make the information it receives public and only some ownership information is available on its website. Only licence applications for competitive licence awards, such as for local TV services (L-DTPS) or commercial radio services are published on the website. They contain ownership information including sizes of shareholdings and names and contact details of shareholders in some cases.

In other instances Ofcom takes the view that they publicise the list of licensees and ownership information for those licensees can be found on the website of the companies register, Companies House, as a matter of public record. This does not however allow ownership to be fully established by the public since only public limited companies have to disclose detailed ownership information to Companies and, in any case, there is charge of £1-£2 for each record accessed which quickly becomes prohibitive if any volume of information is required.

It may be possible to obtain some ownership information under the Freedom of Information Act as Ofcom is a public body subject to such requests. In December 2014 Ofcom confirmed that it has received no such requests and that, in any case, ownership information is already in the public domain, in its view.

## **The practicalities of reporting ownership**

Greater ownership reporting requirements place further demands on both the media and the media authority. In order to find out how the requirement to report works in practice, interviews were carried out with three local broadcasters and the TV and Licensing Department of Ofcom to find out how they manage ownership information in practice.

## **Media Authority**

Media ownership information is reported by media to Ofcom whose remit includes broadcasting, amongst other things. The collection, storage and dissemination of information is managed within the TV and Radio Licensing department and just one of a number of tasks within the department. The department has a team of nine staff, each of whom has responsibility for some tasks related to ownership information ranging from checking information, ensuring that owners are not disqualified from holding a licence, assessing transfer information or investigating issues where the holder of a licence may in reality be a different entity to the provider of the service. They also check ownership information against that reported by the media outlet in the Companies Register. Information must be supplied to Ofcom in hard copy and is stored in hard copy. The element of the staff time that encompasses dealing solely with ownership

information is hard to disaggregate from other tasks but is likely to be significantly less than half-time for each of the nine posts – so perhaps 4-5 full time positions. This is out of a total Ofcom staff of 820.

The main challenge faced by Ofcom in dealing with media ownership information is that of volume; with more than 2000 TV and radio licences to manage, changes to shareholdings or directors happen frequently.

Ofcom has never had to sanction a media outlet for non-compliance with the ownership reporting requirements.

### **Media**

The broadcast media that were interviewed were all local TV stations which started broadcasting in 2014, as part of a new local TV sector in the UK. As small outlets, ownership information is reported by the most senior person, sometimes with support from the relevant person within a parent company. Their experience of reporting ownership information to Ofcom thus far has not been overly onerous since they mostly have very few shareholders and changes in shareholdings have yet to take place. The annual returns are estimated to take no more than 1 day in total. Reporting changes in directorships as they happen is more burdensome as this happens more regularly and requires detailed personal information. The level of financial reporting required to assess their progress against their business plans, as new businesses, is also time consuming.

Concern was expressed at the level of detail required by Ofcom and questions raised about why the information couldn't be obtained from Companies House. There was also uncertainty about whether the information is verified by Ofcom and therefore whether there was any value in reporting it.

Ofcom sends out hard copy forms to the media which they find unwieldy. They would prefer to make an electronic submission which can be done if requested but is not the default method used by Ofcom.

Whilst two of the broadcasters supported the public's right to know who owns the media, one suggested that the public should not have access to ownership information about local TV since they will assume there is some political motivation whereas, in fact, most owners are simply investors. This is in contrast to the newspaper sector which is highly politicised in its ownership.

### **RELEVANT LEGISLATION**

<b>Law</b>	<b>Media covered by law</b>
Broadcasting Act 1996	Broadcast media
Communications Act 2003	Broadcast media
Companies Act 2006	Print, broadcast and online media

### **INFORMATION SOURCES**

**Access Info** full country research on transparency of media ownership:

[http://www.access-info.org/documents/Access\\_for\\_Rights/Media\\_Transparency/tmo\\_uk\\_17july2013.doc](http://www.access-info.org/documents/Access_for_Rights/Media_Transparency/tmo_uk_17july2013.doc)

**Ofcom Licensing** - <http://licensing.ofcom.org.uk/>

**Companies House (companies register):**

<http://wck2.companieshouse.gov.uk/wcframe?name=accessCompanyInfo>