

# NEWSPAPER SOCIETY RESPONSE TO HOME OFFICE CONSULTATION ON “DELIVERING THE GOVERNMENT’S POLICIES TO CUT ALCOHOL FUELLED CRIME AND ANTISOCIAL BEHAVIOUR

## PROPOSAL TO REMOVE REQUIREMENT TO ADVERTISE LICENSE APPLICATIONS OR VARIATIONS IN LOCAL AND REGIONAL NEWSPAPERS

**January 2013**

The Newspaper Society (NS) represents the local and regional media. Our members publish around 1100 local and regional newspaper titles, alongside 1600 websites and other print, digital and broadcast channels.. They deliver trusted news, information and notices to 31 million readers through their print titles alone each week – 61% of all UK adults - as well as their 62 million web users a month.

Local newspaper publishers are increasingly evolving into local media business which serve their communities across print, online and broadcast platforms. They employ 10,000 journalists and are the foundation of the news-gathering process across the UK.

Recent research (IPA Touchpoints 4) shows that advertising in local newspapers is more than twice as trusted as next placed medium TV and nearly three times as trusted as radio.

The Newspaper Society strongly opposes the proposal to remove the statutory requirement for alcohol licence applications or variations of licence applications to be advertised in a local newspaper. We strongly support the retention of all current requirements to publicise such applications in local newspapers.

- The proposal to remove such notices from local newspapers is completely at odds with the assurance given to the Newspaper Society last December by Mr Eric Pickles, Communities and Local Government Secretary, that his intention is to stick to the commitment made when coming into office not to remove statutory notices from local papers during the lifetime of this Parliament.
- Independent research has shown that local media are considered by the public as the prime source of information about their area; Over a quarter (27 per cent) of the adult population read public notices in their local newspaper, more than twice as many as local council websites; (See paragraph 2 below )
- Some 11% of UK adults still do not have access to the internet and this is far higher in some age groups, geographic areas and income groups (see paragraph 3 below).
- The Home Office Impact Assessment is based on shaky figures which do not appear to reflect the reality of advertising rates. The true picture is that such advertising is neither costly nor burdensome (see paragraph 4 below).
- Removing advertisements of alcohol licence applications from local newspapers will have a considerable negative impact on the public's right to be informed;
- **The proposal is a naked cost-cutting measure designed to favour the alcohol industry at the expense of local democracy.**

The necessity for fully and properly informing the public and the effectiveness of mandatory publication of public notices in the independent press in reaching



the appropriate audience of the notice has been demonstrated by the Newspaper Society in numerous submissions, backed by research and evidence, most recently in relation to the proposal to remove the requirement to publish traffic notices in local newspapers – a suggestion already jettisoned by the Welsh Government after just 12 per cent of respondents to a public consultation voted in favour of the proposal. Similar evidence was presented by the NS in response to the previous Labour Government's proposals to remove planning applications notices from newspapers, which were subsequently aborted; the then Government acknowledged that *"statutory notices in newspapers are an effective means of publicity which should be retained. This was supported by research outlining the current reach of local newspapers and of the importance people place upon reading statutory notices."*

Thus the evidence and arguments in support of retention of published notices have been extensively made in recent years. We are surprised that the Home Office should now be re-embarking upon this well-trodden path apparently with no reference to the previous extensive background of similar debates in other Government departments.

**To ensure that statutory notices reach the attention of the maximum number of people in relevant areas, the local newspaper (in print, and augmented by digital) should remain the primary publication method.** Published applications in local papers do not require readers to institute an active search for that information, nor do they need access to the internet to be able to do so.

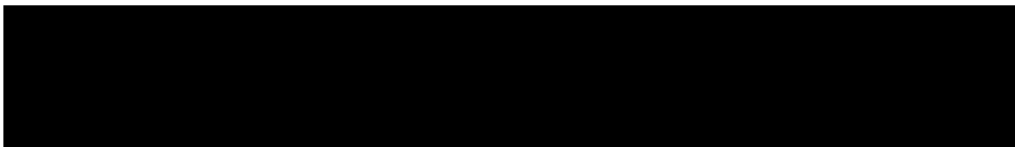
## **1. POLICY PRINCIPLES**

The proposal to remove applications from local newspapers has apparently been introduced into the consultation paper simply as a nod to the "one in, one out" policy, with little or no consideration given to the wider implications of such a move, not least in respect of the very policy objective which underlies the consultation: "to cut alcohol fuelled crime and anti-social behaviour".

Reducing the methods by which the public are informed of new applications or applications for variation to existing licences is hardly compatible with this objective. Particularly where applications are made for extended hours, there is an increased risk of crime and antisocial behaviour and input from the local community is essential to ensure proper and informed scrutiny of such applications: if this input is lessened, because people are unaware that the applications are being made, there is more likelihood of applications being granted which might otherwise be refused, with a knock-on increase in precisely the negative results which the Government policy is seeking to reduce.

The consultation paper makes no attempt to argue that dropping the requirement to advertise applications in local newspapers would lead to improved communication to the public or that the public will benefit from the adoption of this proposal. It is presented as a naked cost saving measure for the alcohol industry, providing at the same time a convenient tick-box for the Government's one-in,one-out policy aspiration. This is despite the fact that the actual costs to the alcohol industry of advertising applications in newspapers is in fact considerably lower than the figures cited in the Impact Assessment (see paragraph 5 below). Nor is it remotely realistic to argue that the present requirement – consisting as it does of a single advertisement in a single publication – is in any way burdensome on the businesses concerned.

The public interest in proper and full communication of information to the local community is apparently to be sacrificed in favour of a financial sop to the alcohol industry. This seems, to say the least, a curious reflection of priorities.



## **2. NS INDEPENDENT RESEARCH ON EFFICACY OF PUBLIC NOTICE ADVERTISING IN THE LOCAL AND REGIONAL PRESS**

### **2012 Research by GFK**

Research was conducted in March 2012 by GFK of 1000 adults across the UK, weighted to be nationally representative for age, gender, social grade and region.

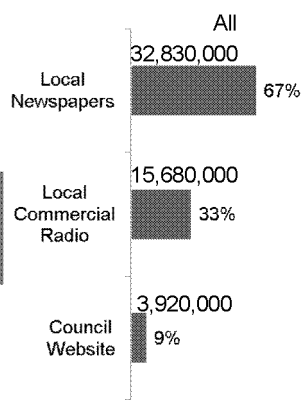
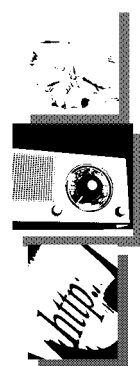
<http://www.newspapersoc.org.uk/sites/default/files/ppt/Traffic-Order-Advertising-Presentation.ppt>

This demonstrated conclusively that:

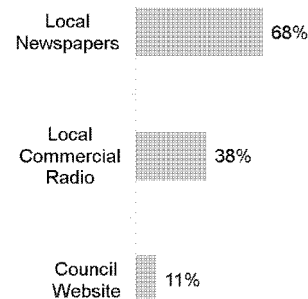
- Local newspapers have a far stronger weekly reach (67% ) than local council websites (8%)
- Local newspapers reach almost 10 million non-internet users who would not have an opportunity to look at council websites – skewed 55+ and C2DE.
- Local newspapers are considered to be more trustworthy and up-to-date by the public than local council websites
- There is much greater likelihood in a notice in a local newspaper being seen than a notice on a council website unless it was actively being sought out

Weekly reach of local newspapers much greater than local commercial radio or local council websites

Accessed in the last 7 days



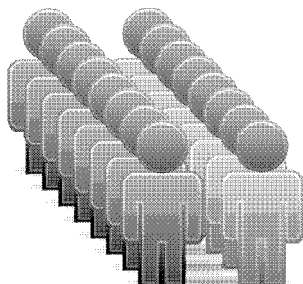
Drivers



Q10. And when did you last read or look at a copy of your local newspaper for at least a couple of minutes? Q12. And when did you last listen to local commercial radio? Q14. And when did you last visit your local council's website? Base: All 1000, Drivers 611)

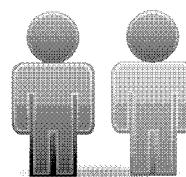
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Eight times as many people have read a newspaper in the past week than have looked at the council website



**32,585,000**

People have read a local newspaper in the past week



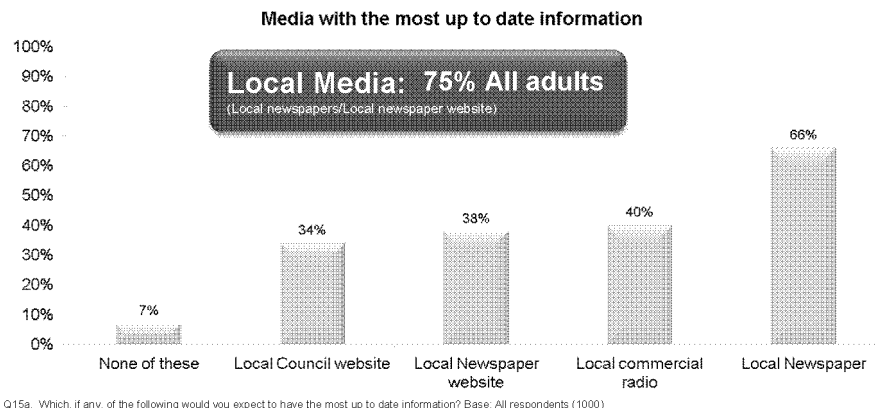
**4,361,000**

People have looked at the council website in the past week

Q10. And when did you last read or look at a copy of your local newspaper for at least a couple of minutes? Q14. And when did you last visit your local council's website? (Base: 1000)

14

Almost twice as many consider local newspapers to have the most up to date information compared with council websites



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## 2011 “Loving Local” Research

Loving Local was a major UK-wide research project which the NS independently commissioned with Crowd DNA to give a fresh perspective on the importance of local community and the associated context of media channels.

The project builds upon previous six-figure research and insight projects from the NS, including the wanted ads and Local Matters, both of which provided clear and actionable insights on the unique and powerful role of local media.

The research showed that local media is **the most trusted media and is seen by respondents as being the most valuable source of information about their local area (72% as opposed to 43% for the internet)** Source: Quantdata, Loving Local Research, June 2011)

Previously, NS submissions and presentations to the Killian Pretty Review and its submission to the DCLG's consultation on the Local Government Publicity Code included two earlier major pieces of independently conducted research which specifically referenced public notice advertising.

- **The Wanted Ads** – a six figure research project launched in Spring 2006 with a quantitative UK-wide sample of 5,083 working age adults. Research conducted independently by TNS. More background at [www.thewantedads.co.uk](http://www.thewantedads.co.uk).
- **Local Matters** – a six figure research project launched in July 2008 with 10 qualitative groups across five population centres, and a UK-wide quantitative study amongst 5,203 working age adults. Research conducted independently by Millward Brown. More background at [www.localmattersresearch.co.uk](http://www.localmattersresearch.co.uk).

These highlight the real importance that the public attach to reading public notice messages in their local newspaper.

### Local Matters

#### Government and public services

Local media - local newspapers and their websites - are seen as the best means for

getting information about the performance of local authorities (75 per cent), far higher than the next highest medium, internet (42 per cent).

Local media (30 per cent) was also seen as the best medium for helping people feel safe in their area, compared to the next highest medium, local radio (19 per cent).

Local media (32 per cent) is the prime source for information about local institutions, services and facilities in a person's area, ahead of local radio (23 per cent) and the internet (18 per cent).

It is the best media source for:

- Feeling part of the local community
- Having sense of pride in the local area
- Knowing whether the local area is improving
- Feeling safe when out and about
- Knowing how strong the local economy is.

#### **the wanted ads Stage I**

- Sixty-five per cent of UK inhabitants say that local newspapers best represent their local area, making the local press four times more relevant than the nearest medium, radio (13 per cent)
- Only 17 per cent of people will skip over ads in the local newspaper compared to the medium with the highest avoidance rate, television (47 per cent)
- Eighty-two per cent of UK residents spend half or more of their time within five miles of their home
- Four out of five local press readers will act on the advertising

#### **the wanted ads stage III**

- Local newspapers and their associated websites are 49 per cent more trusted and relied-upon than the nearest medium, commercial TV.
- Advertising in local media (print and online) is nearly 50 per cent more trusted and reliable than the nearest everyday medium, commercial television (39 per cent)

Wanted ads: <http://www.newspapersoc.org.uk/Default.aspx?page=1879>

#### **Public Notices and planning applications are a well-read section of the local newspaper:**

Some 27% of adults (working age 16-65 – per research sample) tend to read the public notices and planning applications section of their local newspaper. This increases significantly to 36% amongst regular local daily newspapers and 37% amongst regular local weekly newspaper readers. These figures are at similar levels to readership levels of other high traffic advertising sections, e.g. property. This data suggests that not only are public notices and planning applications well read by regular readers but also by less regular readers. More importantly, it suggests that both groups are actively browsing this information in context of their local newspaper readership.

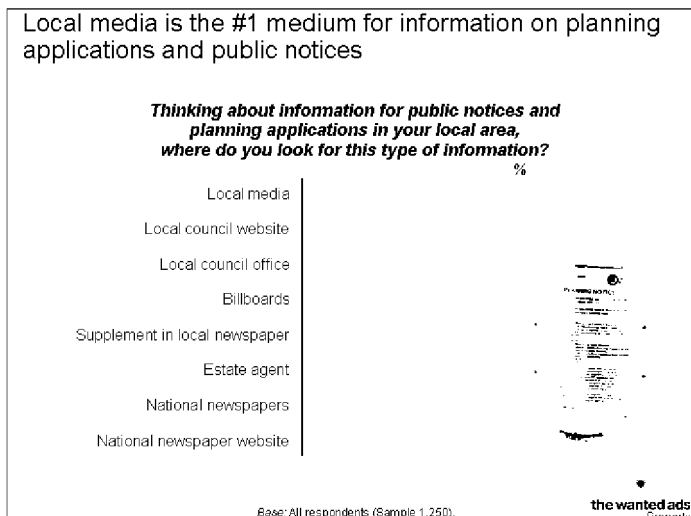
\* Source: *the wanted ads/TNS*

**Research confirms that local media (local newspapers and their websites) are the strongest communications platform for public notice advertisements.** 79% of adults rate local newspapers and their websites as the best suited media channel for advertisements for public notices about property, planning issues and other social developments in their area. This is a 21 point advantage versus the nearest other media channel.

\* Source: *Local Matters/Millward Brown quantitative research*

**Local media is the first place people look for information about public notices and planning applications. It is more than twice as popular**

than local council websites \* Source: *the wanted ads* Property, The NS and Continental Research, 2009



### 3. DIGITAL EXCLUSION

The right to information about licensing applications will be denied to millions if mandatory newspaper publication is abolished in favour of local authority websites alone..

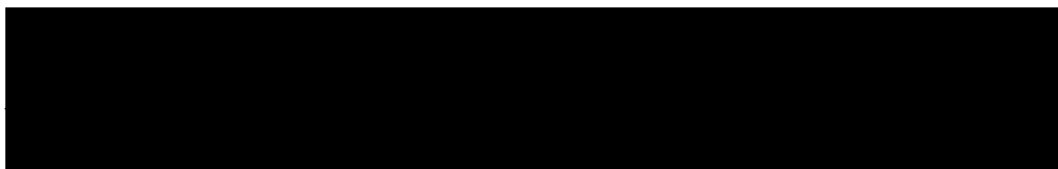
The potential extent of digital exclusion was starkly set out in the report by Price Waterhouse Coopers (October 2009) commissioned by the Champion for Digital Inclusion to assess the 'digital divide'. This found that at that time 10.2 million adults (21%) of the UK population have never accessed the internet, including 4.0 million adults who are both digitally and socially excluded. A further 2 million had not used it for 3 months: 7.8 million households (30% of those in the UK) had no internet connection. The digitally excluded included 2.3 million adults with children, 1.3 million unemployed adults and 6.4 million adults aged 65 and over.

According to the Office of National Statistics most recent Internet Access Quarterly Update, for the third quarter of 2012, still 7.63 million adults in the UK had never used the Internet. This represents 15% per cent of the adult population.

There also continues to be a marked regional differentiation in internet use: yet even in London – the highest usage area – 12% of adults had not used the internet. In the West Midlands, for example, this figure rises to nearly 19%.

There is also an equality issue here: of those who have never used the internet, 1.30 million more women than men have never used the Internet; 4.46 million women compared with 3.17 million men. Again according to the ONS by the third quarter of 2012, there were 3.89 million disabled adults, as defined by the Disability Discrimination Act (DDA), who had never used the Internet. This represents 33% of those who were disabled and just over half of the 7.63 million adults who had never used the Internet. Lack of internet access also impacts more greatly on those on low incomes. Of those adults in employment whose gross weekly pay was less than £200 per week, 7% (358,000) had never used the Internet.

The Newspaper Society does not believe that the consultation paper's proposal to





allow licence application advertisements to be confined to council's websites is sustainable in the light of those findings.

#### **4. INADEQUACY OF RELIANCE ON OTHER METHODS OF PUBLICISING LICENSE APPLICATIONS**

The grant of alcohol licences, or grant of permission for increased hours, is capable of having a wide effect: on the "immediate neighbours" of the premises; on those in the locality who may not reside nearby but whose work/other activities brings them into contact with the premises; and on the community as a whole where the grant of particular licence(s) may have an impact on the nature and character of an area. It is essential that such applications are brought to the widest attention of the local community.

Unlike planning notices, there is no requirement under the Licensing Act 2003 for applicants to serve individual notice of their application on nearby residents/neighbours of the relevant premises. The "blue poster" notices on the premises have been criticised as a haphazard and inefficient means to publicising applications, with the notices being displayed less than prominently, becoming defaced or difficult to read. Such on-premises notices in any event serve to inform only those who either frequent the premises or who regularly pass by the premises – and, in either case, providing they actually happen to notice the leaflet.

**The House of Lords Communications Committee Report** (26 January 2009) highlighted the poor quality of local authorities' websites and failure to reach audiences. Witnesses expressed concern that the quality of local authority sites varies greatly. There was also concern that improvements made to the online provision of information had been at the expense of more traditional information sources such as leaflets and phone lines.

*"Such a shift in emphasis is of concern because, despite the Government's intention over time to make broadband available to all, not everyone as yet has access to the internet. Nor is everyone able to use it. Indeed, it is often the most vulnerable citizens, most in need of Government help, who are least likely to be able to access and use the internet. Citizens' Advice particularly highlighted the problems for the elderly and those from the poorest backgrounds."*

*"We recommend that Government information should always be available and accessible to as many people as possible. In particular, the Government must be clear about its target audiences in communicating information and use the most appropriate method."*

The Home Office's stakeholder meeting in January heard anecdotal evidence suggesting that some local authorities are not placing alcohol licence applications on their websites at all, in breach of their statutory obligation to do so.

An earlier independent usability study of the top 20 UK local council websites, **Local Council Websites: Designed by Committee?** (Webcredible, 2007 – any updated studies?), found

that just four of the sites in the survey achieved a usability score of over 60 per cent and more than half scored less than 50 per cent. The websites had been benchmarked against guidelines including clear navigation.

The report concluded: *"Quite simply, the 20 local councils in this report aren't doing enough to provide the best possible experience to their users. As the top 20 council websites in the UK (according to Socitm's 'Better Connected' survey) it's a disgrace that the average usability score is just under 45.5 per cent."*

#### **4 .CONSULTATION AND IMPACT ASSESSMENT: INADEQUATE EVIDENCE AND ERRONEOUS ASSUMPTIONS**

The consultation paper cites advertising costs which have apparently been derived from anecdotal suggestions made by local authority officials. It would have been preferable had the Home Office contacted local newspapers directly to establish their advertising rates for such notices. We do not consider that the figures quoted in the paper are accurate and in our view the average cost of such applications is much lower than the figures used as the basis for the Impact Assessment. We note that at the stakeholder meeting reference was made to the cost of advertising in the London Evening Standard – yet well over 60 local newspapers circulate in the Greater London area so there are plenty of alternative publications available.

No research appears to have been conducted as to actual readership of public notices in newspapers or public awareness of licence applications in newspapers. From the discussions at the Home Office recent stakeholder meeting, it was clear that the incorrect assumption that such notices are not read – which our research, cited above, demonstrates to be wholly wrong – was apparently based on a complete non sequitur: licensing officials at local authorities assuming that, because no objections were received to an application, that meant than no one had read the notice of application. Again at the stakeholder meeting ACRE referred to the cost of advertising applications as a potential burden for village halls: yet according to ACRE's own website, research in 2009 showed only 5% of village halls reporting problems with licensing and this related to the cost of temporary event licences – costs which are one-off and which could clearly be passed down to the organisers of the event itself or costed in to entry fees or other revenue from the event in question.

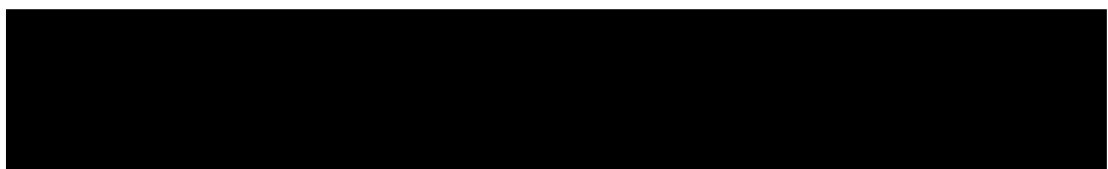
#### **5.PARLIAMENTARY CONCERNS AND SUPPORT FOR THE LOCAL AND REGIONAL PRESS**

The NS is also dismayed that the Home Office has produced this suggestion apparently in total disregard of the numerous expressions of support for the local and regional newspaper industry from the Government, Members of Parliament, and Parliamentary Committees, who recognise that our industry is facing serious, in some cases critical, economic conditions. At a time when voice after voice in Government and in Parliament is urging that ways be found to help the regional press, including by the possible provision of support by way of increasing Government advertising spend in our media – which is recognised for its high levels of trust, readership, community engagement and effectiveness - it is astonishing for the Home Office arbitrarily to produce a proposal to remove up to £8 million a year from our industry – and effectively, for the most part, to transfer that sum to the alcohol industry.

The Leveson Inquiry Report singled out the local and regional media for praise but warned of the difficult challenges it faced and urged the Government to look at ways of supporting it: “... **I suggest that the Government should look urgently as what action it might be able take to help safeguard the ongoing viability of this much valued and important part of the British press. It is clear to me that local, high-quality and trusted newspapers are good for our communities, our identity and our democracy and play an important social role** “

On 18 November, in response to a question concerning the Leveson Report, The Prime Minister said “*The problems there have been in our newspaper industry have not concerned regional and local titles, **which perform an incredibly important function in our democratic system***” (emphasis added).

These views were also echoed in the debate in the House of Lords on the Leveson proposals (11 January). See for example the contributions by the Lord Bishop of Norwich





Lord Stoneham and Lord Janvrin, and the response from Lord Taylor on behalf of the Government.

We also draw your attention to the similarly supporting views expressed in the House of Commons debate on the future of regional newspapers on 5 December 2012. Tellingly, that debate was secured by Mr Andrew Griffiths MP who himself said “We all bemoan the loss of a post office or the local pub – I declare an interest **as the chair of the all-party parliamentary beer group** – but we should bemoan the loss of our local newspapers in the same way, *because they are the key to information within our communities*” (emphasis added). He said “Our local newspapers are the first port of call for people to find information” “The Government must recognise the importance of our local newspapers in communicating messages to the country.”

Addressing Ed Vaizey, parliamentary under secretary for the creative industries, Mr Griffiths said: “I urge him to look at what he can do to get a council of war together with other departments. Let us look at what we can do with the Department for Communities and Local Government and the Cabinet Office, in relation to the Big Society, and at what we are doing with departments such as the Department for Transport.

*“Let us get all those departments together and see how we can maximise the benefit of our local newspapers.”*

He added that “there are ways in which the Government can do more to support, rather than subsidise, our local newspapers. We have to look innovatively at how we can channel Government activity and use our local newspapers to their benefit and that of Government.

Similar expressions of support and calls to action were made time and time again by MPs in that debate: we would urge the Home Office to examine the debate and consider how its proposal to further slash our sector’s advertising revenue is remotely compatible with the clearly and cohesively expressed will of Parliament to look at ways of supporting the regional press.

Again, the same message of support can be found in earlier Parliamentary debates, particularly at the time of the proposals in respect of planning notices, in January 2009 and 19 March 2009.

