IJoC Public Service Media

Active Pluralism:
Dialogue and Engagement as Basic Media Policy Principles

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Although pluralism is widely accepted as a basic characteristic of democratic media, its manifestation in media pluralism policy is generally characterized by a passive approach to dialogue and engagement. Media pluralism policy is typically focused on the mere availability of information resources, and it usually stops short of contemplating how those resources can be created or how they are to be used, even though the underlying assumption is that they will in fact be deployed to the benefit of democratic understanding and decision making. This article examines some normative inferences from theories of political pluralism, and their implications for transforming such a passive form of media pluralism policy to one that is explicitly more active, and analyzes a series of relevant policy measures. It is suggested that such measures should have a much more significant role in liberal democratic media policy to counter increasing trends for new forms of media activity to become more fragmented and yet more narrow.

Keywords: pluralism, media pluralism, media diversity, media policy, public-service content

Introduction

Media pluralism is well established as a major theme in democratic media policy. Although concerns about concentrations of media ownership and control have existed for some time (Bagdikian, 2004; McChesney, 2004), over the past two decades in particular, it has become widely accepted that there is value and importance in providing a diversity of media outputs more generally. Yet there is a strange passivity about the manifestation of media pluralism policy at all levels, whether in particular

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states (Gibbons & Humphreys, 2012; Hitchens, 2007) or by way of international discussion such as that in the Council of Europe (Council of Europe, 2003) or the European Union (Commission of the European Communities, 2007). Media pluralism is regarded as desirable because it is a condition—albeit one of many—for effective democratic functioning, because it helps to reduce obstacles to having a wide range of information resources for democratic consideration. But policy measures usually stop short of encompassing the way that those resources are to be used, even though the underlying assumption is that it is desirable that they will in fact be deployed to the benefit of democratic understanding and decision making. This article considers whether media policy should deal more explicitly with these objectives, so as to implement measures that may actively promote engagement and dialogue between different viewpoints, groups, and communities within a democratic polity. It does so by examining some normative inferences from theories of political pluralism, and their implications for media practice. It analyzes a series of policy measures that have the potential to transform such a passive form of media pluralism policy to one that is explicitly more active. It is suggested that such measures should have a much more significant role in liberal democratic media policy, to counter increasing trends for new forms of media activity to become more fragmented and yet more narrow.

Mainstream Formulations of Media Pluralism Policy

Media pluralism policy is justified on two main grounds: the provision of a wide range of sources that can be used for democratic discussion and the ability of different groups in a democratic society to express their cultural and values differences in media content. As the Council of Europe has put it, it involves:

> Political pluralism, which is about the need, in the interests of democracy, for a wide range of political opinions and viewpoints to be represented in the media. Democracy would be threatened if any single voice within the media, with the power to propagate a single political viewpoint, were to become too dominant. Cultural pluralism, which is about the need for a variety of cultures, as reflects the diversity within society, to find expression in the media. (Council of Europe, 1999, para. 4)

In media policy, the idea of pluralism is often used interchangeably with notions such as "diversity," "plurality of information" and "multiplicity of voices." The general concept both describes and makes normative claims about various commercial models and forms of content that can or should be found in the media. Noting the complexity of definition, a recent review describes media pluralism as being

> related to (1) diversity, variety and plurality of media supply; (2) the public sphere, the general public or the audience; it is (3) provided by free, independent and autonomous media sources, and (4) results in both access and a choice of opinions and representations which reflect the citizens of the State in question. (Centre for Media Pluralism and Freedom, 2012, p. 22)

However, there seems little disagreement that the ultimate objective of policy is to secure a plurality of media content. Where there is considerable divergence is about the best way to achieve that. In practice, regulatory schemes feature combinations of at least three components—diversity of content, of source, and of distribution platform—but it is diversity of content that lies at the core of media pluralism. It relates to the substance of media material, requiring that a wide range of views, opinions, approaches, formats, and subject matter be made available. The normative significance of diversity of content arises from its function in a democratic society, and it is usually taken to include all kinds of content, whether it is popular common sense, scientific knowledge, art and culture, or political debate.

Diversity of source relates to the origin of the content. It requires a variety of program or information producers, editors, or owners. Although such variety in itself cannot guarantee diversity of content, it increases the likelihood that diverse content will emerge and that the flow of information will not fall under the control of a few powerful individuals or companies. Typically, diversity of source implies that content will be provided by a number of separate organizations—that is, external pluralism, also described as "structural pluralism" (Council of Europe, 1999, para. 3); regulatory measures to implement that will be a combination of competition law and ownership regulation to prevent undue concentrations of media power. It also may entail that single organizations, such as public-service broadcasters, should ensure that their output reflects a variety of production sources—that is, internal pluralism.

Diversity of distribution refers to the various delivery services that select and present material directly to the audience. This third dimension is important but it is not always acknowledged (European Institute for the Media, 2004, p. 9). Again, its relationship with diversity of content is indirect: The latter cannot be guaranteed, but the likelihood may be increased that individuals can make choices that allow them to experience a range of content. It is becoming more significant in the context of the separation of media content from delivery and increased convergence of delivery platforms. Formerly, it would have been sufficient to regulate sector-specific sources of material, since they would usually control the outlets also; an example would be a vertically integrated broadcaster. Now, regulation may be needed to ensure that a diversity of content can be accessed across a range of different platforms (Helberger, 2005).

It is evident that the underlying theme in policy discussion of media pluralism, across all its dimensions of diversity, is that information should simply be accessible. All that is required is that members of a democratic society should be exposed to the range of different viewpoints that exist and should have their viewpoints adequately represented (Council of Europe, 2003; Craufurd Smith, 1997; Hitchens, 2007; Valcke et al., 2010). As the Council of Europe (1999) has stated, "It should be stressed that pluralism is about diversity in the media that is made available to the public, which does not always coincide with what is actually consumed" (para. 3). Describing media pluralism only recently, the European Union's High Level Group on Media Freedom and Pluralism noted that it "encompasses all measures that ensure citizens' access to a variety of information sources and voices, allowing them to form opinions without the undue influence of one dominant opinion forming power" (Commission of the European Communities, 2013, p. 13). However, as will be explained in the next section, this appears to be a rather narrow, and arguably peculiar, formulation when compared to its intellectual roots in political pluralism. Those ideas suggest that if pluralism is to be taken seriously, a wider and more proactive basis for policy is needed. Nevertheless, it may be that policy accounts of media pluralism should be seen as a

pragmatic consensus among (certainly European) policy makers about the way that the media's role in relation to pluralism policy should, simply, be stipulated. It may be that in a "clash of rationalities" between market liberalism and democratic involvement (Klimkiewicz, 2009), there is sufficient ambiguity about the meaning of pluralism (Karpinnen, 2012) to allow the former to dominate. The next section therefore considers whether the media should have a particular responsibility for helping to achieve more extensive pluralistic goals.

Political Pluralism and Freedom of Speech in General

Statements of media pluralism policy are not specific about its intellectual sources, but its conceptual reference points are clearly rooted in liberal democratic theory, including political pluralism. Although the literature is immense, for present purposes there are some key themes in identifying what is problematic and how to think about solutions. As Blattberg (2000) observes, "There are two central principles upon which pluralists of every persuasion can be said to agree, namely, that there is a plurality of sometimes incommensurable values in the world, and that these sometimes conflict" (p. 64). The moral and political difficulties are how to shape a stable and peaceful society that will, ideally, be accepted as legitimate by its members. One broad kind of approach has been described as "weak pluralism" (Blattberg, 2000, p. 36) or "thin multiculturalism" (Baumeister, 2000). This approach maintains that, despite differences in ultimate values, liberalism provides sufficient commonality in its own values of individual respect and equality to create a shared basis for political stability. Examples of this approach include Rawls' arguments for finding sets of overlapping consensus in political liberalism, and Habermas' discourse ethics as a neutral and impartial method for resolving difference (Chambers, 1996; Habermas, 1996). A different kind of approach—again, broadly, "strong pluralism" or "thick multiculturalism"—maintains that some values are incommensurable and cannot be reconciled. Examples here include Berlin's and Gray's rejection of the notion of universal reason and acceptance of the likelihood of conflict between incompatible values (Berlin, 1970; Gray, 1995). For Gray, the basis for political order can be no more than a modus vivendi, yet he acknowledges that, to achieve that, some accommodation between the holders of opposing values must be reached. For Hampshire (1989, 1999), opposing parties have what amounts to a moral obligation to negotiate and, if need be, compromise rather than settle their differences by force (see also Bellamy & Hollis, 1998).

What is notable about these varying responses to the fact of pluralism is this: They all suppose that the foundations for a stable political order depend on the different parties engaging with each other, whether to agree common ground, or—in the spirit of Locke's arguments for toleration—to trade their values or interests for the sake of reaching a practical accommodation. Other attempts to deal with the problem of pluralism also depend on the development of dialogue to achieve greater mutual understanding of different positions, whether that involves a hermeneutical appreciation of the other's point of view (Festenstein, 2005) or the removal of barriers to effective deliberative democracy (Dryzek, 2000).

By contrast to such active conceptions of pluralism, as suggested, the response adopted in media policy is essentially nominal and passive, being content to make provision for the mere presence of differing perspectives in the public domain. It is not moved by the possibility that differing perspectives

can exist in parallel, yet do not connect with one another. Nor does it necessarily alert media users even to the fact of difference. If policy were to take political pluralism seriously, it would involve a more positive contribution to resolving the dilemmas of a pluralist society, albeit with no expectation that it should attempt to solve them. The minimal requirement would be to support and facilitate the kind of dialogue that is needed for a pluralistic society to function effectively. Such "active pluralism" would require the deployment of measures that encourage conversation, dialogue, and understanding engagement between different strands of opinion and identity. This does not mean that individuals would be forced to take part in democratic activity and others forced to respond. But if it is accepted that dialogue between the holders of different values is desirable—or even necessary—for a democratic society to persist, some effort should be made to persuade citizens to engage with one another. However, the aim should not be to assimilate diverse viewpoints to eliminate difference. To attempt to do that would be inconsistent with the very idea of pluralism (Festenstein, 2005); and democracy does not require reconciliation of fundamental values, only a practical consensus about workable solutions. An active pluralism policy is a way of responding to that need.

To enable the kinds of dialogue that are required for political pluralism to be recognized in a stable democratic culture, the right to freedom of speech is an important safeguard. However, the liberal doctrine of freedom of expression does not require that any speech should actually occur; and neither does it require that audiences should be required to listen to, still less to respond to, any speech that does happen to take place. Rather, liberty to speak is a condition for facilitating desirable outcomes, but those outcomes are not themselves mandated. This is an essentially passive conception of freedom of expression, and it is deeply inadequate from the perspective of a speaker and a democratic society more generally. The emphasis is on negative protection against interference with what is only the first stage of deliberation—making an expression—but without making constructive provision beyond that, for a right to do more than merely speak but to join debate. There is a case in general for adopting a right of this kind, a positive conception of freedom of expression that emphasizes its ultimate objective, which is communication (Gibbons, 2012). Such interactive engagement is clearly the implicit goal of rationalizations of free expression (Mill, 1859) and is what makes the right meaningful. The classic justifications for giving special priority to freedom of expression—the values reflected in the acquisition of knowledge, participation in a democracy, and self-fulfillment (Barendt, 2005; Mill, 1859; Schauer, 1982)— are all based on important benefits that are expected to flow from enjoying the liberty to speak without hindrance, and those benefits are predicated on the assumption that the exercise of speech will in fact take place and that discursive exchanges of opinion will generally result. Yet, even if it is considered that freedom of speech is only a negative liberty, it may be accepted that, without exchanges of dialogue, speech may not have much worth (Rawls, 1971, p. 204). In a pluralistic society, measures to promote such dialogue are not inimical to freedom of speech; rather, they are to be promoted, because they support free speech values (Lichtenberg, 1987) because they enable voice to the range of perspectives and identities that have to be accommodated in political discussion.

Active Pluralism as a Media Policy

If it is accepted that political pluralism requires a more active approach to encouraging dialogue between different groups, the question arises: To what extent, if at all, should the media have a particular

role in achieving that? It may be noted that most media activity is commercially oriented. Furthermore, even public-service media do not have remits that extend to supporting the very structures of political participation; it is not their function to ensure that citizens' viewpoints are properly represented and are able to make an effective contribution to decision making and accountability. Such support may be considered to be primarily a task for the state. However, there are good reasons why the media in general should take at least some responsibility.

First, it has long been recognized that media activity, both public and commercial, has public-interest implications. Existing media pluralism policy reflects as much in a wide range of liberal democratic countries, conceding that media activity does have an impact on conditions of political pluralism. The issue here is one of extent. Having acknowledged that some form of policy intervention is needed in the media, are current measures adequate and sufficient for the public purpose that has been identified? If it is accepted that that purpose entails some degree of active facilitation of pluralist dialogue, then a passive media pluralism policy is plainly inadequate. Of course, given the general trend toward market liberalization in the media and communications industries, a trend to which policy on pluralism and diversity has ironically contributed (Karpinnen, 2006), it may be difficult to impose active pluralism policy requirements on private firms and organizations. Just as individuals should not be forced to consume media they do not wish to, so commercial entities may resist taking on some responsibility for promoting a healthy democracy (Commission of the European Communities, 2013, p. 27). But the media cannot claim some general exemption.

Second, there is a more positive reason that active pluralism is required in media activity. Contrary to what is implied in media pluralism policy, it is no longer plausible, if it ever was, to believe that the media operate in some form of external relationship with individuals and the society they constitute. Media are an integral part of our everyday acquisition of information, understanding, and conversation (Corner, 2011; Couldry, 2000; Silverstone, 1994). We do not exist in parallel to a media that occasionally impinges on our lives. Silverstone (2006) has described this phenomenon as the "mediapolis," and it entails that, when we make decisions about the way that our society is organized, the media are implicated. By extension, when we respond to the conditions of political pluralism by creating means of facilitating dialogue between disparate value systems, the media have a political responsibility to contribute to that process.

Third, the development of active media pluralism policy is made all the more urgent by the evolution of new forms of media, especially pay TV and online access to content, which lead to fragmentation and segmentation of audiences and users (Gibbons, 1998, 2000; Helberger, 2012). The recent report of the European Union High Level Group has drawn additional attention to this problem, sometimes described as the "silo" effect, emphasizing the tendency to "create more insulated communities as isolated subsets within the overall public sphere" and its potentially negative effect on democracy (Commission of the European Communities, 2013, p. 27). But the group's recommendation to forestall the tendency is only that provision should be made for users to deactivate personalized search results and newsfeeds. It seems clear that a more comprehensive solution must involve active efforts to break down barriers to understanding.

Some developments in thinking about media pluralism already accept that a completely passive approach to pluralism policy is inadequate. In European human rights jurisprudence, it has been acknowledged that media pluralism has an important role in enhancing the full exercise of freedom of speech. Initially, it was accepted that, although not obligatory, media pluralism policies are permissible and do not constitute an unjustified interference with freedom of speech (Craufurd Smith, 1997, pp. 174–183). More recently, however, in *Manole* and in *Centro Europa*, it has been held and confirmed that contracting states have a positive duty to ensure that the public have access to impartial and accurate information and to a range of opinion and comment that reflects the political diversity within their jurisdictions (European Court of Human Rights, 2009, 2012). Nevertheless, that positive obligation is limited, because it is envisaged as enabling only access to (that is, the availability of) a plurality of opinion.

Another strand of thinking, which moves the discussion a little closer to a more active conception of media pluralism, is the literature on exposure diversity (Helberger, 2012; Napoli, 2011). This view emphasizes that it is not sufficient for policy to rely on the mere existence of diverse content across various kinds of media; rather, content must be brought to the attention of potential users. Exposure diversity is therefore concerned with the audience and user dimensions of media pluralism and the extent to which diversity of supply actually leads to diverse consumption. There is an emphasis on the way that, notwithstanding that a wide range of content is accessible in theory, the experience of diversity may be reduced in practice. This is because there may be restrictions on technical access or through pricing structures, or the architecture of supply may reduce choice within walled gardens or create path dependency through personalization (Helberger, 2012). The policy response is anticipated to be initially the removal of such obstacles so that audiences and users may take advantage of the range of material that exists. The normative background assumption is that exposure to diverse material will lead to users discovering a wider range of viewpoints, which will feed into political debate. Yet even here, there seems to be a tension between aspiration and practice; media pluralism policy is not envisaged to extend to the active promotion of dialogue.

In policy discussion, there is also an increased awareness of the complexity of media pluralism and that empirical assessment of the existence of situations of pluralism requires a wide span of relevant factors to be considered, even if they might not be converted into normative recommendations for shaping behavior. The development of the European Media Pluralism Monitor (Valcke et al., 2010) drew on a comprehensive range of risk indicators that reflect major domains of political participation and cultural expression. In essence, those indicators are prerequisites for a vibrant, functioning democracy. But, as the authors emphasize, even where use of the monitor might reveal risks to media pluralism, the policy implications are a separate matter. Other notable discussion of empirical factors has recently taken place in the United Kingdom, with the regulator Ofcom's assessment of approaches to measuring media plurality (Ofcom, 2012a, 2012b) implicitly acknowledging that a purely passive approach to media pluralism is unsatisfactory. Ofcom rejected the criterion of availability of the number and range of media enterprises as a useful measure, because "an analysis of this type would not take account of the ability to influence opinion." To do that, levels of media consumption and perceived impact, by reference to the diversity of viewpoints consumed, also had to be taken into account (Ofcom, 2012a, paras. 5.5–5.32). The UK regulator offered an interesting vision of a well-functioning pluralistic environment: a diverse range of

independent news media voices across all platforms, overall reach and consumption being relatively high, consumers actively multisourcing a range of news sources, adequate competition between providers, overall investment and commercial returns being sufficiently high to ensure sustainable quality journalism, and no organization or news source having a concentrated share of consumption (Ofcom 2012a, para. 3.32). Yet the policy and regulatory implications remain limited; their purpose would be to ensure an environment where media users are aware of many differing viewpoints and can readily access them. However, although there is much potential for diverse opinion holders to engage with one another, that is bolstered only by hope.

Summarizing so far, at least in liberal democracies, the fact of political pluralism requires political action to maintain the stability and legitimacy of the system. Whatever the ultimate solution, a common starting point is the entering of dialogue to reach accommodation between the holders of differing values and identities. Media communication is an intrinsic element of such dialogue, so media activity will necessarily be involved in policies to promote it. However, traditional media pluralism policy has made only a limited contribution to the broader policy objective. If the wider implications of political pluralism are to be taken seriously, media policy measures that actively promote dialogue need to be considered.

Measures for Active Pluralism

This section examines a number of possible measures to promote a more active style of pluralism. However, some preliminary points should be made. First, a concern with active pluralism is one that will be mainly focused on diversity of content. Structural measures for diversity of sources and outlets would continue to be important in making content available, but the aim would be to encourage dialogue that would require mechanisms for bringing different sets of standpoints together in some way. This means that the focus of measures for active pluralism would also tend to be on internal pluralism—that is, the variety of material offered by a single media organization, since it is within such an organization that the relationship between different kinds of content can be managed. Nevertheless, as will be discussed below, the potential power for single organizations to frame the agenda for dialogue means that internal measures to support any kind of pluralism need to take place in a wider context of external pluralism.

Second, it may seem that active pluralism is really a matter for public-service media, whether as broadcasters or as providers of programming and related material on the Internet. Certainly, public-service broadcasting has traditionally played a key role in bringing diverse parts of its audiences together and in encouraging greater understanding between them. Here, the approach of the BBC in the United Kingdom has been instructive and influential. One of the most significant characteristics of public-service broadcasting is its universality. Although this was necessitated by the historical limitations of the technology (a limited allocation of public spectrum, provided to push content to the audience), the geographically universal provision of programming was accompanied by a sense of duty to cater for all tastes and interests among the audience. In its early years, the BBC had a tendency to impose on the audience a degree of what some regarded as a cultural consensus, albeit that the motivation was to broaden and deepen its tastes and experiences. But by the 1970s, there was much greater sensitivity to the importance of catering for actual audience interests and a firm emphasis on diversity, with broadcasters being depicted as "hosts" to a range of ideas, with the objective of helping people to

understand different issues and to enrich their choices and possibilities (Gibbons, 1998, p. 59). This resulted in a shift in public-service functions, with providers having to take on a stronger role in mediating public preferences, as they maintain society-wide coverage while representing its varied interests. Public-service broadcasters have accepted that they have some responsibility for articulating regional and community consciousness, perspectives, and identities and for acting as a forum that enables the whole nation to speak to itself (Gibbons, 1998, p. 61). More recently, this has tended to be more explicitly linked to democratic inclusiveness (Gibbons, 2009).

These concerns continue to characterize the historic core values of contemporary public-service media across Europe, as recently articulated by the European Broadcasting Union, with two in particular having democratic and pluralistic implications. With respect to universality,

> We strongly underline the importance of sharing and expressing a plurality of views and ideas. We strive to create a public sphere, in which all citizens can form their own opinions and ideas. We are aiming for inclusion and social cohesion; [and, in relation to diversity,] . . . We support and seek to give voice to a plurality of competing views— from those with different backgrounds, histories and stories. Conscious of the creative enrichment that can derive from co-existing diversities, we want to help build a more inclusive, less fragmented society. (European Broadcasting Union, 2012, pp. 4–5)

These themes are replicated in the regulatory regimes of most European jurisdictions (Mendel, 2011; see also Ofcom, 2009, para. 3.1, Figure 1) and are considered by some as having an important role in promoting social cohesion and tolerance (Council of Europe, 2009).

For all that, public-service providers should not be regarded as solely responsible for active pluralism measures. Their dominance over the distribution of media content is steadily diminishing, and their visibility in the contemporary converged and multichannel media environment is increasingly under threat. Partly as a consequence, not all European public-service providers have been able to maintain full commitment to their core values (Iosifides, 2007). More directly, problems in pluralism policy are not restricted to particular genres of content. In the following discussion, it is not assumed that public service provision is the preferred platform for delivering more active pluralism measures. It is accepted, however, that public-service providers are likely to be more amenable to introducing or, in many cases, enhancing such measures. Similarly, it is acknowledged that the resistance of commercial providers to such measures is likely to be a significant practical difficulty in implementing them so that the policy burden may have to be placed on public-service providers. But the aim here is to offer a schematic account, arranging possible measures in a spectrum from passive to active, to stimulate thought about how pluralism policy might be developed to a higher level.

Providing Information

Providing information is the most passive approach to pluralist content. A wide range of material may be provided, allowing the audience to use it as it thinks fit. Such provision is passive to the extent that no attempt is made to relate different kinds of information to one another. All media providers may

be expected to seek out new viewpoints and to represent a greater variety of possible standpoints, but if information is merely provided, then it is for members of the audience and users to make linkages or to draw out the significance of diversity. In a traditional, linear broadcasting environment, an important skill in making audiences aware of different types of content is that of scheduling programs in ways that tempt audiences to stay with the same channel and thereby experience new information. In relation to nonlinear programming, it becomes more important to provide pathways to new programming, whether through promotional announcements or through technical devices such as electronic program guides (Gibbons, 2000). Yet, in both cases, whether audiences alight on material new to them, or if such pathways provide efficient navigation through a range of channels or web pages, the impact on pluralism will be passive if their effect is only to alert users to the existence of diverse content. The relatively recent phenomenon of linking audiovisual program material to Internet sources or to social networking activity does not necessarily increase the level of activism if it captures only trends in the following of particular items of information.

Enabling Participation

At least two basic roles for media may be identified for enabling participation. One is difficult to quantify and consists of the media being little more than an "introduction agency," whereby members of the audience, readerships, or users are alerted to the existence of issues or problems and prompted to take matters further by contacting external interest or pressure groups where they can participate in political discussion. The more prominent participatory role for the media, with many variations, relates to their use as a forum or platform for some exchange of viewpoints or a discussion. For example, the studio discussion is a traditional television format, more recently developed into organizing a panel of politicians or public commentators who are exposed to questions from an appropriately representative audience. Or a documentary may present a range of perspectives about an issue in a concentrated form.

In recent years, it has become common for established media such as newspapers and television to create blogs on their websites and to create links to social networking media. This gives the impression of facilitating discussion, but casual inspection suggests that it is rarely an adequate substitute for organized debate. Generally, optimism that the mere existence of social media can lead to improved democratic debate may be misplaced (Iosifides, 2011). Nevertheless, enabling participation that consists of simply the ability to "express" and no more is not without democratic value. It may provide a vent for feelings, and it may indicate broad trends of opinion, albeit to be treated with caution as a proxy for a representative sample. Not least, and this is especially relevant for public-service media, it also enables feedback on the provider's service, which is part of making the provider accountable.

For all that these approaches can provide a more controlled consideration of conflicting viewpoints, their contribution to active pluralism depends on whether the agenda and topics adequately reflect the range of viewpoints available and whether the discussion is focused and structured so that the parties can address one another's points. This, in turn, depends on the extent to which the media provider acts as a facilitator for the participants to engage with one another.

Promoting Engagement and Provoking Debate

Is there a case for media to go further, not only enabling exchanges of information and opinion by those who are interested in talking to each other but actively promoting engagement and provoking debate? The discussion so far has proceeded on the assumption that healthy internal relationships within any society require more than the mere acknowledgement of diversity, one that is accompanied by strategic negotiation between factions. Rather, for a democracy to function effectively as a legitimate basis for political decision making, some form of public dialogue is needed, to ensure that different positions are properly taken into account, in a process of reasoning that leads to decisions that are acceptable to all. As indicated in the discussion of pluralism generally, this does not mean that democratic debate is wholly rationalist and directed at the ultimate reconciliation of conceptual differences. In complex multicultural democracies, assertions of identity and beliefs about fundamental values need to be accommodated and may be expressed through rhetoric and emotion. Ultimately, however, a democratic settlement is validated by dialogue about such differences and consequent agreement about their practical resolution (Dryzek, 2000; Festenstein, 2005). The question is how far media should go in assisting this process. At the very least, as described earlier, they might be expected to present information about the range of positions available; but should they seek to make the parties aware of their differences? Newspapers and websites may provide op-ed sections and broadcasters might be expected to bring different positions together, whether through physical debate or through programming that portrays comparisons and contrasts. But how far should they facilitate deeper engagement? In many ways, the roles outlined above are reactive. They are public-interest responses to relatively noncontroversial states of affairs: the existence of obvious diversity or the evident wish of some individuals and organizations to take part in discussion. But should the media intervene actively to uncover unnoticed forms of diversity or to maneuver parties into engaging with one another?

Here, commercial providers and public-service providers may prefer different approaches. The former, in the shape of newspapers or web operators, may welcome controversy; whereas the latter are likely to resist such a role. In the UK, for example, public-service broadcasting has not set the agenda for political debate. Its journalism has tended to take its cues from newspaper journalism and its coverage of current affairs tends to be guided by the interests of Members of Parliament. Furthermore, there is a risk that a public-service media provider might antagonize its audience if it was perceived to be overtly instructional, notwithstanding the general public-service duty to inform, *educate*, and entertain.

The latter point may be partly the consequence of what is potentially a major legal and regulatory obstacle: the duty of impartiality. Again, the experience in the United Kingdom is instructive more generally. One element of the UK duty—which applies to all broadcasting, whether public service or not—relates to news, in whatever form, which must be reported with due accuracy and presented with due impartiality. Another element prohibits editorializing; radio and television programs must exclude all expressions of the views and opinions of the person providing the service on matters of political and industrial controversy and matters relating to current public policy. The third element is the general requirement that due impartiality on matters of political or industrial controversy and matters relating to current public policy must be preserved on the part of any person providing a service; however, this may

be achieved within a program or, unless the matters are "serious," over a series of programs taken as a whole (BBC, 2013b, section 4; BBC Trust, 2007; Ofcom, 2013, section 5).

However, requirements of due impartiality are not inconsistent with active pluralism. It may be noted that personal view programming is permitted, provided that it is adequately signposted. In addition, it is accepted that, in implementing due impartiality, the aim is not to provide an unrealistic balancing that gives equal weight to all viewpoints but the placing of different perspectives in context, in relation to one another and more widely. The BBC, for example, states that,

> We must be fair and open-minded when examining the evidence and weighing material facts. We must give due weight to the many and diverse areas of an argument. Breadth and diversity of opinion may require not just a political and cultural range, but, on occasions, reflection of the variations between urban and rural, older and younger, poorer and wealthier, the innovative and the status quo, etc. It may involve exploration of perspectives in different communities, interest groups and geographic areas. (BBC, 2013a, para. 4.4.1)

In fact, the underlying thrust of impartiality requirements is actually to improve understanding by enabling the audience to appreciate the larger picture, and it does not necessarily inhibit editorial decisions to encourage engagement. Indeed, again, the BBC maintains that

> We seek to provide a broad range of subject matter and perspectives over an appropriate timeframe across our output as a whole. . . . We are committed to reflecting a wide range of opinion across our output as a whole and over an appropriate timeframe so that no significant strand of thought is knowingly unreflected or under-represented. . . . We exercise our editorial freedom to produce content about any subject, at any point on the spectrum of debate, as long as there are good editorial reasons for doing so. (BBC, 2013c, paras. 4.2.2–4.2.4)

In theory, it may appear that these aspirations already reflect the need for active pluralism. In practice, the very universality of public-service remits means that there may be a tendency to consensus by interpreting possible points of difference somewhat narrowly. For economic reasons, to maximize market appeal, there may be a similar tendency in commercial media activity. But there are indeed good reasons for editors actively to promote engagement between different perspectives and to provoke debate. It is insufficient to adopt a wholly reactive approach, even if that enables a considerable degree of exposure diversity (which is not the same as active pluralism). Before political dialogue can be joined, diverse groups need a minimum level of understanding of one another's position, and they may not be able to do that for themselves. They may not know how to make contact to start an encounter; they may lack a common, basic vocabulary to interpret their opposing values or viewpoints; and they may not appreciate the wider context. Here, all kinds of media can have an important role in mediating interactions between different groups.

However, that may first require active encouragement to explore possibilities for conversation based on expert judgment about states of affairs. Perhaps controversially for public-service media, it may require critical interpretation of inconsistent or conflicting lines of thought to open avenues for accommodation if not reconciliation. The basis for this kind of approach does already exist in current media practice, but a shift in policy is needed to exploit it more fully and to resist the market pressures to adopt a line of least resistance. The use of expert commentators in news and current affairs programming to explain difficult issues, whether political, economic, scientific, or technical, is well established. More extended use of expert judgment, by way of a greater use of personal view programming, to areas that are not quite in the news but raise matters of democratic concern, would be a small step toward a more active pluralism. Expert moderation of, or commentary about, the content of blog posts is another example of interventions that could improve engagement and dialogue. Enabling such experts to engage with one another and with the wider public is a natural but necessary further step. Not all interventions need be explicit and didactic; the commissioning of good drama or entertainment that deals with complex issues may be a much more effective way of provoking discussion. But it is important that such discussion actually takes place. In respect of drama that depicts vulnerable people and their problems, it is quite common for media providers to provide help lines to support those who may have been affected by the program. In a similar vein, controversial or significant documentaries are sometimes followed by studio debates to examine the questions posed. Yet, even there, the agendas are reactive. By contrast, in an interesting—but not repeated—example of active pluralism, some years ago in the United Kingdom, Channel 4 (with its public-service remit to provide different and innovative material) offered a series of themed programs over whole weekends, each dealing with a political philosophy or a cultural lifestyle, and including a range of dramatic, film, artistic, documentary, and discussion treatments of the subject.

In promoting engagement and encouraging debate, all kinds of media already make valuable contributions (Butsch, 2007), but they could be less cautious and do more. The major gap is in commercial media provision; they should be doing much more to assist exchange and understanding between different viewpoints. The underlying problem, which applies to all media, is that media users are unlikely to have the resources to make sense of diversity and need assistance in interpreting the relationship between different perspectives. However, once media organizations do take a more active role, even if they manifest a high degree of internal pluralism, it is important to ensure that a single institutional perspective does not predominate and that new ideas and agendas are allowed to emerge. For that reason, even in relation to public service provision, active pluralism should take place in the context of structural diversity. This much has been recognized in UK media policy, in which a plurality of public service provision is regarded as critical; for example, the due impartiality of the BBC may be different from the due impartiality of Channel 4 (Gibbons, 2009).

Prospects

All kinds of media should be providing more of this kind of creative and ambitious effort to make sense of pluralism, especially in a digital environment where the semblance of diversity conceals fragmentation and a lack of close engagement between users. The new environment poses both threats and opportunities for public-service media. They face the prospect of being marginalized amid the huge range of programming and online material that is becoming available. It may be uncertain, therefore, from

an audience perspective to be perceived to be cajoling users to become involved citizens; a more active, interventionist public media might not attract users and may actually discourage them. It may also be risky, from a political perspective, to be seen as stimulating popular challenges to established practice. Hence, public-service media may rationalize a less active approach to pluralism on the grounds that it may be perceived to be partial treatment of controversial issues. But this caution is unfounded. It is interesting, for example, that UK broadcasters have yet to provide an in-depth interpretation of the contemporary place of Islam in UK society. In fact, the rules about impartiality would not prevent such an exercise, provided that the programming did not contain the broadcaster's editorial opinion. The difficulty is that, if such programming were to be a useful contribution to active pluralism, it would involve at least somebody's interpretation and judgment, and that may regarded as upsetting the status quo.

But responsibility for this kind of engagement should not be restricted to public-service media. Commercial media also have an important role in a pluralistic society to offer positive explanation and interpretation of the (pluralist) world that they portray as a minimum form of active encouragement to different groups to engage with one another. Here, digital interactive media provide exciting opportunities. The role does not mean that entertainment and popular material should be replaced with only earnest offerings of political analysis. On the contrary, the media's democratic function is enhanced by their ability to capitalize on their wide reach and stimulate the interest of audiences and users who not might otherwise be tempted to experiment with novel subject matter. They have the capacity to draw readers, audiences, and users into significant new experiences, both professionally produced and user generated, of learning about and interacting with ideas and groups that they would otherwise be unlikely to encounter. However, the promise cannot be fulfilled without some change to the current market ethos that dominates the sector. Here, and this applies to traditional commercial media also, pluralism policy will need to consider ways of creating incentives for delivery of the public benefits of active pluralism.

Although the realities of political pluralism in liberal democracies make a persuasive case for an active approach to media pluralism policy, it is another question as to whether it is politically—and commercially—viable. However, the passivity of the traditional approach, directed to only the availability of diverse content, is patently lacking from a democratic perspective. A policy of exposure diversity offers a clear improvement as a basic step to encouraging understanding between different parts of a democratic society. But if some such understanding is to be achieved at all, an important component of any pluralism policy must be one that highlights the importance of active engagement between diverse sources of identity and viewpoint. To move in that direction, it must first be acknowledged that current conceptions of media pluralism policy are too narrow to achieve their immanent aspiration to enhance democratic activity. Second, public-service media should be mandated to take a more active approach. Third, the pluralistic benefits of public-service contributions should be fully recognized as an integral and necessary component of media pluralism policy. In making these moves, contrary to beliefs that economic liberalization in the communications industry points away from public-interest interventions of this kind, politics does matter (Gibbons & Humphreys, 2012). Discussion of media pluralism continues to be a recurring theme in media policy discussion across Europe, and the opportunity should be taken to treat it seriously.

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