



NUJ second submission to the Competition and Markets Authority inquiry on the 21st Century Fox and Sky merger

December 2018

Introduction

The NUJ is the voice for journalism and for journalists across the UK and Ireland. The union was founded in 1907 and has 30,000 members. The union has been representing journalists throughout the media industry for over 110 years.

The NUJ is an independent trade union; it is not affiliated to any political party and has a cross-party parliamentary group. We are affiliated to the Trades Union Congress (TUC), European Federation of Journalists and the International Federation of Journalists (IFJ).

The NUJ strongly supports an investigation by the Competition and Markets Authority (CMA) into the proposed merger, which we believe poses a significant threat to Sky's existing workplace culture, media diversity and broadcasting standards.

In December 2010, the NUJ demanded a full-scale inquiry by the Competition Commission into Murdoch's plans to take total control of satellite broadcaster BSkyB. Our stance during the last seven years has not changed. We do not support the merger of Fox and Sky.

Any individual, family or company that dominates the media landscape is damaging to our democracy. The risk posed by further concentration of media ownership also undermines quality journalism in the public interest.

This is our second submission to the CMA and it is primarily focused on the union's concerns relating to the potential impact of the Fox Sky merger on journalists, workplace culture, ethics and standards.

NUJ ethics

The NUJ's ethical code of conduct was first developed in 1936 and is at the heart of what we stand for as a union. The union's code can be found online here -

<https://www.nuj.org.uk/about/nuj-code/>

The NUJ has always stood for high journalistic standards based on the code and we have consistently backed members who are willing to take a stand for ethical journalism.

Sky News

The NUJ believes that Sky News offers a high quality service and should continue to occupy its distinct place on the media landscape. Any threat to employment at Sky News would diminish the service provided to viewers.

As a union we do not accept that jobs losses are an inevitable consequence of a rejection of the merger. The threat of closure and the threat of job losses are designed to inhibit opposition to the merger and have caused concern amongst our membership.

The NUJ unequivocally opposes the closure of Sky News.

NUJ members employed at Sky are proud of the service and proud of their contribution to news coverage in the UK. They wish to continue that work.

One NUJ member said:

“I have been at Sky News for almost three years, having previously worked for the BBC. I’m incredibly proud of the work Sky News produces: the strength of its journalism, its high ethical standards and there is a genuine sense of teamwork. I have loved my time working here and would be devastated if it closed.

“In my experience, Sky rewards hard work, there’s tremendous support from senior management, it’s impartial in its coverage and provides much needed political and financial analysis.

“If it were to close, the BBC would be the country’s only 24 hour news channel. Any broadcaster needs competition in order to perform at its best. Companies, individuals and politicians must be held to account and the loss of Sky News would undoubtedly have a devastating impact on journalism as a whole, not only in terms of jobs, but in providing coverage that is in the public interest.”

Another NUJ member has said:

“I joined Sky News in as a producer, after having worked at ITV, ITN, STV, BBC Radio and commercial radio. While I enjoyed working at other broadcasters, I am happier at Sky than previously and I feel better treated. For a start, the pay is significantly better and the benefits are more generous. The facilities are excellent. We have subsidised food and drink, an on-site gym, shuttle busses to and from various tube stations and free taxis for out of hours working. These points matter because they make up the day-to-day experience of coming to work, and because they are important financially.

“I would be absolutely devastated if Sky News shut down and 800+ people lost their jobs. Besides which, Sky News produces quality journalism; its existence enhances

the UK media landscape and its disappearance would be terrible for journalism in the UK.

“Take for example our coverage of the Myanmar refugee crisis, our special coverage from the frontline during the battle for Mosul and our investigations into health scandals such as Primodos and vaginal mesh implants... to name a few. If Sky News disappeared we would only have BBC for rolling news - which would damage media plurality in this country.”

A third NUJ member working for Sky said:

“I’ve always found Sky to take broadcast standard compliance really seriously. Our compliance team is superb – there is frequent and thorough training for all at Sky Sports News and programme makers are expected to meet the highest quality thresholds and standards.

“Sky’s treatment of employees - my experience again shows Sky to be a responsible, enlightened and caring employer. Individuals are treated with respect, managers are given thorough and extensive training, there is great support for those who need it, when they need it - at every level. There are clear grievance procedures which are followed to the letter. There are significant programmes and initiatives around diversity and inclusion.”

At the moment, the Murdoch family does not have the same degree of control over Sky as it does with 21st Century Fox and News Corp.

The NUJ is concerned that a shift to full control would have a detrimental impact on staff and the workplace culture.

Since the CMA investigation was launched, Rupert Murdoch has threatened to close Sky News. It has also been reported that 21st Century Fox has restarted talks to sell most of the company to Walt Disney.

The threat of closure is not part of the CMA's specific remit for the merger investigation. Nevertheless if Sky News was acquired by another party this could help to increase media plurality within the UK. If a potential buyer was not found, then the closure would be opposed because journalists would be made redundant and the decision would decrease media plurality in the UK.

The News of the World

The NUJ condemned the closure of the News of the World in July 2011. At the time, James Murdoch informed staff that the newspaper was being wound up. In a shock announcement, he said that its last edition would be printed on Sunday 10 July.

In response, Michelle Stanistreet, NUJ general secretary said:

“This shows the depths to which Rupert Murdoch and his lieutenants at News International are prepared to stoop. The announcement James Murdoch should be making is the dismissal of Rebekah Brookes as chief executive of News International.

“The shocking revelations show beyond doubt the systemic abuse and corruption at the top of the operation ran by both Rebekah Brooks and Andy Coulson. Yet News International has persistently lied about the extent of this scandal and tried to pass it off as a problem created by a couple of rogue reporters.

“Closing the title and sacking over 200 staff in the UK and Ireland, and putting scores more freelancers and casuals out of a job, is an act of utter cynical opportunism.

“Murdoch is clearly banking on this drawing a line under the scandal, removing an obstacle to the BSkyB deal, and letting his senior executives off the hook. That simply won't wash. It is not ordinary working journalists who have destroyed this paper's credibility - it is the actions of Murdoch's most senior people.

“James Murdoch was absolutely right when he said in his statement that 'wrongdoers turned a good newsroom bad.' Yet those wrongdoers are still there today, at the top of the News International empire and ordinary staff at the paper are paying with their livelihoods.

“The closure of the News of the World - a newspaper printed for 168 years - is a calculated sacrifice by Rupert Murdoch to salvage his reputation and that of News International, in the hope that readers will switch allegiance to a new seven-day operation at The Sun, the government will wave through the BSkyB deal and he will widen his grip on the UK's media landscape.”

Phone hacking happened under the hands-on leadership of key senior figures in Murdoch's News International. It is simply unbelievable that they were unaware of the existence and the scale of this abuse.

Phone hacking laid bare a moral and ethical abyss at the heart of Murdoch's operation. Journalism is damaged when it does not serve the public interest or command public trust.

Those who have been jailed are victims of this culture which has come from the very top.

Leveson Inquiry - part one

During the Leveson inquiry, the union submitted anonymous testimony to Lord Justice Leveson highlighting the bullying culture prevalent in some national newspaper newsrooms including Murdoch owned titles.

The testimony from the News of the World that was submitted to the inquiry by the NUJ should be revisited. This evidence is relevant to the CMA's ongoing investigation.

One journalist with 30 years' work experience said:

"I worked for the News of the World for over three years. There was tremendous pressure. Everyone talked about the byline count. Reporters had to do what they needed to do to get the story.

"You'd be given impossible tasks. If you couldn't do them you were a failure, you didn't get a show in the paper. In a professional context it's mission impossible. Of course, if you've got people who are hacking phones and producing great stories, the honest reporter is thinking they're not in the same league, that something's wrong with them. I know some reporters felt that way. It was a very intimidating culture.

"[REDACTED] was a nasty force through the paper. Junior executives and reporters were in fear of him. He was intimidating and would threaten to put you in a dead end job.

"When things came to an end at the News of the World, it invariably came to an end badly. People lived in fear.

"There's a real military chain of command. You do what you're told when you're told. People really need to understand what it was like. It takes a pretty brave person to take a stand. Your life would be made miserable and you'd quickly find yourself out of work. You're terrified if you do anything you'll not get any work in the rest of the industry. You grit your teeth and put up with it. You know it's wrong, but you don't want to be a Judas. If you want a career in the future you shut up and you keep quiet."

Another journalist said:

"During my time at the News of the World, I experienced pretty much constant bullying. My section editor would find fault with everything I did, making my life absolute hell. She sent emails behind my back, made comments about my weight. Just nasty stuff, really. It was the culture throughout the place. A woman reporter working for the newsdesk was sent sexually explicit text messages by someone senior to her. When she complained, she was just told not to make a fuss. The behaviour was all quite open, everyone joins in.

"They'd make young reporters wear stupid costumes and parade around the office while people took pictures. It was basically just humiliating. One young female reporter had to go out dressed head to toe in meat for a Lady Gaga story. It's totally sexist and degrading. A young male reporter was made to wear a cheerleader's outfit. Another was told to dress as a ballerina. Another reporter had to pose in his pants. You had to walk through town like that.

"If you don't do it, you've not got a contract. You're existing on freelance shifts. You're on a weekly retainer and they can just sack you when the mood takes them. It's like walking on egg shells. The hours are long. Regularly I'd be there 'til 11 or 12

at night, waiting for head office to call back with the desk shouting at me. There was constant pressure to deliver. You'd have to tape all your conversations, but you weren't allowed to tell the people you were interviewing.

"I'd be given work to do with unrealistic deadlines. When I'd say anything, I'd just get screamed and shouted at in front of everyone. There'd be no time to make calls and get things right. You'd be given a couple of hours to do a spread that should take a couple of days to properly research and write. There was when I had to make up a quote - it was only once. It was absolutely awful, I felt terrible. But I didn't have a choice and I had to get the piece done.

"Everyone had anecdotes of terrible behaviour. The atmosphere was poisonous, it was unchecked bullying. When your boss said jump, it was a case of how high and where do you want me to jump from. I wasn't only me, there was talk of the 'revolving seat' in the office.

"There was no support. There's a staff association, NISA, but you weren't allowed to go along if you were a casual. And you couldn't raise stuff like bullying with them anyway, you know they're there to serve the company, not an individual journalist's interests. They didn't even let the NUJ into the building.

"The whole experience has had a terrible impact on me. I lost my flat when I lost my job. I ended up having to go to the doctor for medication. In the end, I just didn't want to be in journalism anymore. I'd started off so passionate and interested in journalism, but my experience at the News of the World killed it for me and I'm trying to build a new career."

A journalist with more than 15 years' work experience said:

"The News of the World was an incredibly tough and unforgiving workplace under [REDACTED]. Mistakes were not tolerated and there was a genuine sense of fear before morning conference if there weren't enough good stories. On more than one occasion, execs were kicked out of the editor's office and told to come back when they had some stories. The atmosphere as a result was incredibly tense and in the time I was at the paper three or four staff suffered physical collapses in the office, almost certainly to some extent as a result of the stress. On one occasion I suffered [REDACTED] from stress and ended up in A&E [REDACTED].

"It's harder to point the finger at bullying. If you got the job done well, were enthusiastic and upbeat about everything and delivered good stories... the anger wouldn't fall on you. But there were people in the office who were apparently out of favour and the behaviour towards them would often verge on the bullying. The most obvious example to my mind was Clive Goodman, who enjoyed a high salary and big title as Royal Editor, and came in for a lot of flak from [REDACTED]. He'd be publicly lambasted for a lack of stories or ideas in conference, probably more than anyone. It could be embarrassing for everyone when it happened publicly, as it sometimes did, in news conference in front of 20-25 other people. People tended to stare hard at

their lists and avoid eye contact as much as possible. I am not suggesting this excuses his later actions, far from it, but there is no doubt in my mind that he was under intense pressure to deliver.

“In my opinion, having independent trade union representation at News International might well have affected the culture at the News of the World. I am not convinced staff felt they would be properly supported if they raised concerns. As it was, if you had a problem, you sorted things out yourself with your line manager. NISA was there to negotiate pay deals, and support staff in the event of redundancy. Otherwise, you were on your own. Having the NUJ represented would have given staff more confidence in their dealings with management and, almost certainly, fostered a greater sense of openness.”

A journalist with more than 25 years' experience, including many years at the News of the World said:

“There was a systematic regime of bullying at the News of the World, starting from [REDACTED]. There couldn't have been more cruel and nasty executives at the [REDACTED] than those people.

“They created immense pressure to come up with world exclusive stories. It was relentless. They wanted to bask in the glory of major exclusives and the pressure was always on to come up with the next one. [REDACTED] was dogged in piling on the pressure. It was absolutely the worst place ever to work, absolutely miserable.

“The approach was always: 'That's not good enough, that's fucking not good enough.' The way the paper was run was totally dysfunctional. The biggest rival of the news team was the features department. If news would bid on a story, features would outbid them. After the features department, the biggest rival to news was The Sun - not the [Other Titles]. [REDACTED] was desperate to outdo [REDACTED].

“This is the regime that Murdoch created. It's dog eat dog. It's not normal. In other papers there's not this internal rivalry with colleagues shafting each other. This was encouraged by [REDACTED]. They enjoyed this fighting amongst colleague; they would think it was funny. I've worked in a wide range of newspapers but never known anything like this. They'd set us off like wild dogs against each other. They thought it was all a great game to keep everyone on their toes. They'd light the touch paper, sit back and watch them kill each other. It was relentless, you could never rest.

“[REDACTED]. He'd humiliate people in conference. He'd just start swearing. 'What the fuck are you doing? How dare you put that fucking shit on the list? Where are the stories, where are the fucking stories?' People would start to list stories and he'd interrupt and say 'Next'. Then you'd have to sit there squirming, feeling completely and absolutely hung out to dry. Then he'd get [REDACTED] to come over after conference to tell you how crap you are. Classic bullyboy tactics. You'd dread

Saturdays [the day the News of the World went to press]. It was constant ritual humiliation. I wish I'd taped some of those conferences; it'd be dynamite now.

"If [REDACTED] rang you up, you'd speak and he'd just be silent. Total silence until he'd say 'This isn't good enough. I'll see you when I get in.' He'd leave you sweating, then just ignore you. It was nasty mind games all the time.

"[REDACTED] used to rant and rave all the time. He would encourage [REDACTED] to take people into his office and 'give them a good kicking.' The whole office could hear him shouting, ranting and swearing at the top of his voice. He was a sociopath, an out and out bully. I saw three people, including a male journalist reduced to tears by him. Another person, a freelance who was just doing their best, trying to please [REDACTED], was completely reduced to tears, made to feel useless and hopeless. He'd go through things with a red pen, rip things up and tell people to do it all over again, just to flex his muscles. These were good journalists, experienced writers.

"It was all about who could shout the loudest, who could make the most noise. The most unpleasant place to work and lots of people left because of the constant bullying. Morale was at rock bottom, I'd never known anything like it.

"You'd get calls on a Saturday night, to say get on a plane at 7am the next morning. When one girl complained of all the calls she was getting out of hours, she got more calls, every single week. It drove her out, she was incredibly upset. I know people thought about complaining to HR, but it would have made it worse. At least four people left who couldn't take the bullying anymore. The in-house staff association, NISA, they're nice people but what are they going to do if you complain about your boss bullying you? He'd have denied it. They'd pay you off, you lose your job. Where do you go? There aren't that many jobs in Fleet Street anymore.

"[REDACTED] was incredibly hands on. He was always searching, wanting, demanding the great exclusives. I can't tell you the number of fake stories that went into the News of the World - lots. I never made stuff up but the pressure on people was enormous.

"The things that have emerged about hacking and everything are the tip of the iceberg. The problems are endemic in the industry. [REDACTED] is one of the highest users of private detectives. The use of them and everything else was widespread. If there was a scandal with a celebrity, they could obtain the numbers the celebs had phoned prior, during and after the scandal broke.

"People don't realise it was incredibly stressful. You'd get phone on a Sunday morning - not even a hello, how are you? Just, 'Why did you fuck up on this story?' You'd go back in on a Tuesday and the humiliation would start again. The personal cost is huge. You become a different person, just so stressed, you're always working and your home life is ruined.

“The News of the World had a great reputation with massive financial backing, but people got to know how miserable it was there, it made recruiting incredibly difficult. No-one wanted to join and everyone wanted to leave.

“I wouldn’t speak out publicly and I totally understand why other journalists won’t either. Anyone who wants to carry on in journalism or PR, if they start giving damaging evidence at this inquiry, they know there will be consequences. Just look at the reaction to those people who have spoken out. Sean Hoare set this whole thing off when he spoke to the New York Times. [REDACTED].”

The culture at the News of the World was set at the top of the organisation yet it is ordinary working journalists who were sacrificed and whose livelihoods were destroyed.

Those at the top of Murdoch’s companies continue to enjoy impunity.

In a secret recording of Rupert Murdoch privately addressing Sun journalists in 2013 he implied that he would re-hire any journalist found guilty of crimes, saying:

“What you’re asking is, what happens if some of you are proven guilty? What afterwards? I’m not allowed to promise you - I will promise you continued health support - but your jobs - I’ve got to be careful what comes out - but frankly, I won’t say it, but just trust me.”

It is vital to consider this newsroom culture as part of the CMA investigation. The views and experiences of NUJ members who worked for the News of the World should offer a dire warning to the CMA. This anonymous testimony must be taken into account during the CMA’s assessment of the 21st Century Fox and Sky merger.

Approaches to journalistic and ethical standards

When Rupert Murdoch was asked by the New York Times in 2003 whether Sky News had begun imitating Fox, Murdoch’s reported response was:

“I wish. I think that Sky News is very popular and they are doing well, but they don’t have the entertaining talk shows - it is just a rolling half-hour of hard news all the time.”

In 2007 Rupert Murdoch said he wanted Sky News to become more like Fox News. At the time the House of Lords communications committee met with media representatives, regulators and consumer groups as part of an inquiry into media ownership. Murdoch said he wanted Sky News to be “a proper alternative to the BBC” and he believed Sky could become more like Fox, even if the legislative and regulatory framework did not change.

In the minutes from the Lords committee in 2007, Murdoch distinguished between the Times and the Sunday Times, in which he said he did not interfere in editorial matters, and the Sun and the News of the World, where he said he acted like “a traditional proprietor”.

The committee minutes stated: "He exercises editorial control on major issues - like which party to back in a general election or policy on Europe."

When it comes to honouring undertakings concerning media ownership, Rupert Murdoch's track record speaks for itself.

After he took over The Times, the following year he was considering firing the editor, Harold Evans but as part of the purchase deal he had agreed the editor couldn't be fired without the approval of the independent directors created through the 1981 undertakings that were linked to the deal. His response at the time was:

"God, you don't take all that seriously, do you. Why wouldn't I give instructions to The Times when I give instructions to editors all around the world?"

More than 30 years later and in 2017, Lord Puttnam claimed that James Harding was sacked as editor of The Times because he backed President Obama in the 2012 US presidential election.

According to Murdoch's biographer, Thomas Kiernan, Murdoch has said:

"You tell these bloody politicians whatever they want to hear, and once the deal is done you don't worry about it. They're not going to chase after you later if they suddenly decide what you said wasn't what they wanted to hear. Otherwise, they're made to look bad, and they can't abide that. So they just stick their heads up their asses and wait for the blow to pass."

The value of any commitments made in negotiations with Murdoch should be judged on his past actions and any future offers should be subjected to exacting scrutiny.

David Yelland, editor of the Sun from 1998 to 2003 has said:

"All Murdoch editors, what they do is this: they go on a journey where they end up agreeing with everything Rupert says. But you don't admit to yourself that you're being influenced. Most Murdoch editors wake up in the morning, switch on the radio, hear that something has happened and think, 'What would Rupert think about this?' It's like a mantra inside your head. It's like a prism. You look at the world through Rupert's eyes."

Bruce Dover, News Corp's director of business development in Asia, has said:

"The thing about Murdoch is that he very rarely issued directives or instructions to his senior executives or editors. Instead, by way of discussion he would make known his personal viewpoint on a certain matter. What was expected in return, at least from those seeking tenure of any length in the Murdoch empire, was a sort of 'anticipatory compliance'. One didn't need to be instructed about what to do, one simply knew what was in one's long-term interests."

During the build up to the Iraq War in 2003, all 175 of Murdoch's newspapers gave full editorial backing to the US-led invasion, despite claims there was no editorial interference and overwhelming public opposition to the war.

The former Sunday Times editor, Andrew Neil, told a House of Lords inquiry in 2008: "there were more discordant voices [on the Iraq invasion] in the Bush administration than there were in the Murdoch empire, and that is just the way he runs things."

Roy Greenslade said that Murdoch had an "unerring ability to choose editors across the world who think just like him" and "how else can we explain the extraordinary unity of thought in his newspaper empire about the need to make war on Iraq?"

In advance of the war, The Times declared: "Winning the public-relations battle is almost as vital as military victory."

The NUJ strongly believes that allowing the Murdoch family to increase their control of Sky risks undermining Sky's editorial independence and its future as a broadcaster of integrity and high standards.

The union also opposes the merger because Murdoch has trampled over one of the core principles of journalism - to protect sources and whistleblowers. He did so without a thought for the consequences, prioritising a deal with the Metropolitan police in order to salvage his corporate reputation at the time of the phone hacking scandal.

One of the overriding responsibilities of any journalist and a principle enshrined in the NUJ's code of conduct is the protection of sources. It's a vital aspect of a free press - that whistleblowers and sources are able to come forward and share information they believe the public should know about, in the certain knowledge that their identities will be protected. That is why the NUJ challenged News International's decision to hand over journalists' emails and sources to the police.

In April 2012 Rupert Murdoch attended the Leveson inquiry part one and claimed that his in-house management and standards committee "did not disclose any sources of any journalists at all" but when the data was handed over to the police, the union received calls from journalists and from whistleblowers who felt betrayed. More than 300 million emails, expense claims, phone records and other documents were handed over to the authorities.

Rupert Murdoch told the Leveson inquiry: "If you want to judge my thinking, look at the Sun".

Lord Justice Leveson in his report said:

"Rupert Murdoch accepted that The Sun broadly reflected his worldview. His editors would not need to ask him for his opinion on any particular topic; they would know

his thinking on the issues of the day in general terms, and could work out what it would be likely to be in any specific instance. Some have likened this process to the workings or metaphorical radiations of the Sun King, but, in fact, it is no more than basic common sense. Editors at The Sun, and probably also the News of the World, could form a pretty good idea of what their proprietor wanted without having to ask."

After the Leveson inquiry had taken place and in 2015, the union claimed that vicious, racist and inflammatory articles in Murdoch titles have a negative impact on all of us. At the same time the NUJ called for Katie Hopkins and The Sun to be held responsible for whipping up xenophobia and hostility because history has repeatedly shown that when sections of the media resort to describing people as 'cockroaches' it only serves to inflame prejudicial hatred. The NUJ strongly believes that such language and behaviour is a breach of ethical journalistic codes.

In 2016 the NUJ condemned Kelvin MacKenzie's commentary in The Sun claiming that Channel 4 news correspondent, Fatima Manji, should not be allowed to do her job because she is a Muslim wearing a hijab. In his column MacKenzie attacked Channel 4 and said: "Was it appropriate for her to be on camera when there had been yet another shocking slaughter by a Muslim." The union maintains that this feigned moral outrage is the language of racial hatred and bigotry.

In 2017 the union went on to call for an investigation into the prevalence of Islamophobia, racism and hatred espoused in the British press. This followed widespread protests by Jewish and Muslim organisations as well as over 100 cross-party MPs in reaction to the publication of inflammatory comments by Trevor Kavanagh who referred to "The Muslim Problem" in his Sun newspaper column. Kavanagh said: "But there is one unspoken fear, gagged by political correctness, which links Britain and the rest of Europe. The common denominator, almost unsayable until last week's furore over Pakistani sex gangs, is Islam."

Many of Murdoch's companies have prioritised political influence over journalistic ethics or regulatory standards. If Fox is allowed to take control of Sky then we fear the same dire pattern will be repeated.

An independent voice at work

It is significant that the phone hacking scandal at News International happened in a workplace where the NUJ has been effectively blocked by Rupert Murdoch. Journalists working across his newspaper titles have been denied the collective representation of an independent trade union for a generation.

We strongly believe that the union-busting that took place at News International and the barriers that exists for NUJ representation in the media industry contributed towards the moral vacuum that was allowed to proliferate at the News of the World.

In 2001, the Institute of Employment Rights warned that a loophole in the Employment Relations Act 1999 could be used to prevent staff from joining independent trade unions.

Under the UK's statutory recognition procedure, independent trade unions cannot apply to represent workers' rights at an organisation if the employer already recognises another union. However, it is not necessary for the trade union recognised by the firm to be independent - in fact, it can be an organisation set up by the employer themselves.

It is possible to ballot for a dependent trade union to be derecognised, allowing employees to choose an independent one instead, but the process of doing this is prohibitively complex and if the issue is put to the vote, the employer and the dependent union are given the right of access to the staff - a privilege not afforded to either an independent trade union or the workers who initiated the ballot.

This loophole effectively prevents employees from being represented by a union that is independent of their employer, and that is exactly what happened at News International.

The loophole is often referred to as the 'NISA clause' after the News International Staff Association - a trade union set up by Murdoch's company.

In 2001 NISA was denied a certificate of independence, partly because it does not have any income other than the funding it receives from the employer.

If News International staff had access to independent advice and legal backing by a trade union, they would have had somewhere to turn when they were asked to partake in unethical behaviour, without having to fear for their jobs.

During the Leveson inquiry, Rupert Murdoch was asked about trade union rights. John Hendy QC represented the NUJ at the inquiry and he highlighted that there have been numerous accounts of staff at Murdoch's newspapers being pressured into pursuing stories in an unethical manner.

At the time, Hendy reported that the general secretary of the NUJ, Michelle Stanistreet, described: "endemic bullying, huge pressure to deliver stories, whatever the means, overwhelming commercial pressures which are allowed to dictate what is published, and the overweening power and control of editors over their journalists and of employers over their editors."

Hendy suggested that if News International journalists were allowed access to the NUJ or another independent trade union, this could be "at least one step towards the eradication or prevention of the unethical story-gathering practices which Lord Justice Leveson has heard about."

Murdoch told the inquiry he was not aware of any internal investigations within News International into the rumoured 'culture of bullying', declaring that his staff "always strike me as a very happy crowd" and he added that employees can turn to their editors and NISA if they are having problems at work.

Hendy also asked the media mogul whether he influenced the Labour government at the time of the passing of the Employment Relations Act to leave a loophole in the legislation so that his company would be able to avoid truly independent workers' representation.

Hendy said:

"What I want to suggest to you is that you had some discussion or people in News International had some discussion with [Tony] Blair or officials on his side to ensure that that provision was in the legislation so that the NUJ or indeed any other union could not make an application for recognition for collective bargaining at News International".

Murdoch claimed no such conversation ever took place.

Collective representation by a trade union is a moral and human right and it is wrong that the cynical imposition of a staff association by an anti-union organisation should be allowed to block workers from being properly represented by the union of their choice.

Despite the company's hostility to the NUJ, during the phone hacking scandal a case came to light where a private detective was instructed by the News of the World's management and in the wake of the arrest of royal reporter Clive Goodman to "stop" being a private detective and to instead "become a journalist". In this instance, the person was even instructed by the News of the World to join the NUJ and acquire a union press card - a breathtakingly cynical move which is particularly ironic given News International's stance towards our union.

Leveson Inquiry - part two

Part two of the Leveson inquiry is intended to focus on investigating allegations relating to cover-ups and corruption at News International.

The NUJ strongly believes the Fox Sky deal should not proceed unless part two of the Leveson inquiry has taken place first, and the evidence that it generates should be examined and considered before a decision is taken about the merger. Information from part two of the Leveson inquiry is directly relevant to the CMA's current investigation.

Michelle Stanistreet, NUJ general secretary, said:

"It is vital that this deal is halted until part two of the Leveson inquiry has taken place. Most of the British public do not believe that Rupert Murdoch is a fit and proper person to run Sky, and whilst there are clear reasons of corporate opportunism that drive his desire to finally clinch this deal, there's no benefit for the

public in this takeover being given the green light. We need greater plurality in our media, not an ever-further toxic consolidation of power and control.”

Murdoch's media workplaces

The union's opposition to the 21st Century Fox and Sky merger is informed by our direct experience of dealing with various Murdoch companies and their track record in relation to professional standards and employment practices.

There remains a widespread fear amongst media workers about speaking out. Furthermore, many are contractually prevented from speaking on the record as a condition of their employment or the non-disclosure agreement they have signed to receive a severance payment or legal settlement.

The NUJ urges the CMA to seek out information about Murdoch's companies relating to the past and current terms and conditions of employment, cases that have gone to employment tribunals, and all settlement and confidentiality agreements signed off by Murdoch companies. This information needs to be gathered by the CMA so that it can gain a clearer understanding of how the various companies operate.

In 2009 The Guardian highlighted the case of Matt Driscoll, a News of the World reporter, who was awarded almost £800,000 for unfair dismissal and disability discrimination. An employment tribunal found he had fallen victim to “a consistent pattern of bullying behaviour” whilst working for the title.

The NUJ contacted a range of journalists and asked them to contribute their views and experiences to this submission. Many expressed a general concern about the proposed Fox Sky deal but most were not willing to speak out - either on or off the record. We would infer this is indicative of the levels of fear about the consequences and retribution for those who attempt to challenge the Murdochs.

One anonymous NUJ member said:

“I worked for nearly a decade for one of Murdoch's newspaper companies, it was a very hierarchical culture and male dominated. People are dispensable. I was a loyal, senior staff member but they concocted a process to get rid of me. They get rid of staff when it suits them and they always have the money when they need it. The bullying culture is tolerated and not challenged. I'm worried about Murdoch's monopoly; he invests in Donald Trump and has too much influence on the political process.”

In November 2017 at a public event in the House of Commons, Joe Lindsley, a former aide to Roger Ailes, spoke out about his experiences. He said Ailes had tried to get him to use “headlines as weapons” and that it was “impossible to be honest and work in that world.”

He also said that Fox uses threats to maintain their power and the company had no regard for the truth.

At the same event, Kelly Wright, a Fox News anchor who is currently suing the network for racial discrimination spoke out about his experiences. Having worked for Fox for 14 years, Kelly said: "I love my job but I don't like what's been happening on racial disparities in the corporate culture". Kelly also said that Fox failed to be fair and balanced, it employed only a handful of Black and Hispanic reporters and the company had a disregard for equality at work.

Jessica Golloher, a former Fox News radio correspondent who is also suing the channel for gender related discrimination and retaliation spoke out at the same event. She said that she lost her job just 24 hours after calling the Fox hotline for bullying and harassment. She said the company made numerous, unlawful, discriminatory decisions based on her gender.

Other American journalists have spoken to CNN about Fox News media coverage and how it affects their views about working for the company:

"I'm watching now and screaming," said one Fox News personality in a text message to CNN whilst watching the network. "I want to quit."

"It is another blow to journalists at Fox who come in every day wanting to cover the news in a fair and objective way" one senior Fox News employee said. They went on to add: "Fox feels like an extension of the Trump White House."

"Frankly, there are shows on our network that are backing the president at all costs, and it's that short term strategy that undermines the good work being done by others" said another Fox News employee.

CNN has also reported that the numbers at Fox News who have left or been fired or suspended over sexual misconduct continues to grow.

In 2016 Fox News anchor Gretchen Carlson said she was fired in retaliation for rejecting Roger Ailes sexual advances. After reportedly trying to challenge the culture of harassment, she alleges that Ailes "sabotaged" her career because she "refused his sexual advances". She challenged Ailes rather than Fox because her contract stipulated that disputes should be resolved in private arbitration.

The NUJ strongly believes that such arbitration clauses in employment contracts can be used as a means of protecting the public reputation of companies.

In 2016 Fox disclosed that the company had spent about \$35 million to settle claims and 36 "potential litigations" relating to Ailes. In March 2017 Newsweek reported Fox News have paid out more than \$85 million to make multiple sexual harassment allegations go away.

When the above evidence is considered alongside the financial settlements made by News Corp in the UK, including the payments to Gordon Taylor and Max Clifford, it indicates a systematic and consistent approach regardless of the nature of the dispute or geographical location - Murdoch companies attempt to conceal problems from the public view and prevent cases coming to court.

Ailes had been reporting to James and Lachlan Murdoch since June 2015 and at the time of Ailes's departure, James and Lachlan Murdoch said the company was committed to "maintaining a work environment based on trust and respect".

When Ailes left Fox, Rupert Murdoch said: "Roger Ailes has made a remarkable contribution to our company and our country. Roger shared my vision of a great and independent television organisation and executed it brilliantly over 20 years."

The first sexual harassment lawsuit against Bill O'Reilly was launched in 2004 – 13 years before he was forced to leave the network. An investigation by The New York Times found five women had received payouts from O'Reilly or the company in exchange for agreeing to not pursue litigation or speak about their accusations against him. The agreements are reported to have totalled around \$13 million.

The company has said in a statement that executives were unaware of Bill O'Reilly's settlement in a sixth case taken by Lis Wiehl and totalling \$32 million. O'Reilly has claimed that no one challenged his behaviour but Megyn Kelly has refuted this:

"O'Reilly's suggestion that no one ever complained about his behaviour is false," and "I know because I complained."

Kelly said she wrote an email to the co-presidents of Fox News, Bill Shine and Jack Abernethy, in November 2016 about O'Reilly's treatment of women.

The NUJ strongly believes that victims are often marginalised or ignored when they raise complaints about workplace culture, and settlements offered to victims are most often agreed behind closed doors. In addition, the NUJ firmly believes that the Murdoch family has a consistent track record of backing senior employees despite their illegal or unacceptable behaviour at work.

Another former Fox News employee, Juliet Huddy, who has settled a claim of sexual harassment against O'Reilly said:

"I think people have regrets when they sign non-disclosure agreements ... I would imagine that they do. I think it's something that you grapple with when you're going through it and you think it's the best move to make, and it's not necessarily the best move."

James Murdoch was asked about the \$32 million Lis Wiehl settlement and said: "It was news to me when we saw that number the other day" and "It's easy to look from the outside and say, 'Didn't you know that?' I think the issue becomes, how do you react to those things after they're revealed", he said, according to Variety.

It is also worth recalling what Lord Justice Leveson said:

"... if the explanation of James and Rupert Murdoch is correct, far from simply limiting external damage to reputation, one or more parts of the management at the News of The World was engaged in a determined cover-up to keep relevant information about potential criminal activity within the organisation from senior management within News International. If News Corporation management, and in particular Rupert Murdoch, were aware of the allegations, it is obvious that action should have been taken to investigate them.

"If News Corporation were not aware of the allegations which, as Rupert Murdoch has said, have cost the corporation many hundreds of millions of pounds, then there would appear to have been a significant failure in corporate governance and in particular in the effective identification and management of risks affecting News International and, thus, the corporation."

In November 2017 Reuters reported that 21st Century Fox has reached a \$90 million settlement of shareholder claims linked to sexual harassment at Fox News. The settlement resolves claims against Fox representatives including Rupert, Lachlan and James Murdoch.

The defendants did not admit wrongdoing in agreeing to the settlement and Fox said it will enhance corporate governance and create a new workplace "professionalism and inclusion council".

Reuters added that in a typical derivative case, shareholders sue in the name of a company to remedy wrongs inflicted by an alleged lack of oversight by a company's officers and directors. And this example is not the first large derivative settlement made. In 2013 News Corp reached a \$139 million settlement of derivative claims relating to the phone hacking scandal.

Murdoch responds to major failures in order to limit commercial damage. The evidence suggests there is a lack of commitment to improve standards, comply with the appropriate regulatory frameworks or adhere to corporate governance best practice. The consistency of the patterns suggests the explanation is a specific culture set by the very top.

The NUJ is concerned that if Sky is allowed to be absorbed into 21st Century Fox then it would risk being submerged in the culture we have highlighted throughout this submission.

Attacking rivals

Murdoch is known to attack his rivals and an integral part of his business strategy has been to promote his commercial interests by undermining the BBC.

In 2011 the NUJ called for the BBC licence fee deal to be re-examined in the light of revelations surrounding the influence of Rupert Murdoch and his News International executives on David Cameron and senior government ministers. Michelle Stanistreet, NUJ general secretary has said:

“As the News International scandal deepens, it is becoming increasingly clear that David Cameron and others at the heart of government have been in thrall to Rupert Murdoch, shamelessly prioritising the commercial interests of one powerful man over those of the British public.

“The shabby deal on the BBC licence fee settlement was done behind closed doors, with no democratic scrutiny or transparent discussion. It marked a watershed in the Corporation's 89-year history.

“Quality public service journalism and the BBC audiences are suffering the consequences of this deal, clearly taken at a time when huge pressure was being exerted by News International executives.

“We know Murdoch was putting huge pressure on our politicians in the run up to the general election and since then.

“Channel 4 News reported that 'Friends say Gordon Brown believes the Murdoch empire turned its fire fully on him because he refused to adopt their demands, cutting back BBC TV and Online services and the broadcasting regulator Ofcom, too. Gordon Brown's friends say David Cameron, in the run up to the election, was readier to say what Rupert Murdoch wanted to hear'.

“The assurances from Tories keen to woo News International came thick and fast – David Cameron publicly stated, 'So in the Conservative government Ofcom as we know it will cease to exist; its remit will be restricted to its narrow technical and enforcement roles.'

“It is vital that the dodgy licence fee deal should be undone and there should be the proper transparent and open debate with staff and stakeholders about the future funding of the BBC that was called for - and ignored by the government - at the time.”

There is no owner or corporate influence that overshadows the BBC's output but the Murdoch family has a track record of attempting to curtail and diminish the BBC.

In November 2017, BBC journalists reacted to a Sun front-page story accusing BBC workers of sleeping on the job. Under the headline “here is the snooze”, The Sun claimed BBC News Channel’s staff were “wasting taxpayers’ cash” and showed pictures of journalists sleeping at the BBC’s Broadcasting House in London. At the time the BBC called the story “misleading”.

In response the Newsnight presenter Emily Maitlis closed the programme that night by saying: “BBC output is quite literally dreamed up by producers in their sleep”.

The NUJ believes that Rupert Murdoch operates on the basis of corporate self-interest and uses the media companies he controls as a means of achieving these goals. For example, in 1994 he stopped the BBC’s international news broadcasting on his Asian Star satellite service because of the Chinese authorities reacted badly to a BBC programme about Mao Zedong. In 1998 his publishing company Harper Collins stopped the publication of Chris Patten’s book about Hong Kong and afterwards Murdoch was able to launch a cable TV channel in China.

Media diversity

The Murdoch family business spans film, television, cable, satellite, newspapers, magazines and book publishing. This cross-ownership and its economy of scale have allowed Murdoch to cross-subsidise and cross-publicise his activities. It has allowed him to embark on savage price-cutting campaigns and bolster loss-making, yet prestigious enterprises, such as The Times.

As a union we have a strong commitment to the concept of media diversity and plurality. Any individual, family or company that dominates the media landscape is fundamentally damaging to our democracy.

There is already an unsatisfactory situation prevailing in the UK, where the provision of radio and television news is restricted to the BBC and two dominant players in the commercial sector.

Sky and News Corp are the biggest commercial news producers in the UK and their combined influence gives cause for concern. For example, Sky News Radio is the main supplier of news to more than 280 commercial stations across the UK. Sky’s only real competitor in radio news production is our public service broadcaster, the BBC. In television, there are now only two UK-based 24-hour television news channels - Sky News and the BBC News Channel.

There is an unprecedented case for stopping the Fox Sky merger on plurality grounds. If the deal goes ahead, it will result in the unparalleled accumulation of media power in the hands of one family.

The market dominance of Rupert Murdoch coupled with his significant influence on editorial decisions would breach the requirement for media pluralism. If plurality means anything, it indicates news from diverse, reliable, independent sources.

Sky Ireland

Sky television is one of the major players in the Irish media market, both as a provider of television services and broadband services, but also as a competitor for advertising against other UK television services as well as RTE and TV3. Sky One, Sky Sports and Sky News as well as paid for subscription channels are all available in the Irish market.

If the Murdoch family are given full control of Sky TV it will mean a substantial increase in its media holdings in Ireland without any involvement of Irish regulatory rules.

If there are concerns about the impact on democracy and public discourse in the UK because of the deal, there should be similar concerns for Ireland.

News Corp owned newspapers have a substantial hold within the Irish market with their Irish editions. These are The Sun, The Sunday Times, The Times as well as the Dublin based news agency, Storyful. Sky, with its very deep pockets, also competes against local services for sporting events.

Recently News Corp was able to acquire Wireless Group and its biggest asset, the London based TalkSport radio station. However, what analysts may not have realised was that TalkSport came with seven Irish radio stations, now also under the control of News Corp.

The radio stations are FM104 and Q102 in Dublin, LMFM in Louth and Meath, Cork's 96FM and C103, and Live95FM in Limerick. It also owns U105.8FM in Belfast and operates an advertising sales house in Dublin.

The NUJ does not believe that Irish ownership is simply an unintended consequence of wanting to buy TalkSport. News Corp has been an aggressive player in the Irish market from at least 1995, when Irish editions were started. At that time the collapse of the Irish Press Group meant there were potential opportunities to gain readers when the Irish economy was looking attractive to companies that were finding it difficult to expand within the UK.

Currently The Times London's online publication is aggressively selling itself in Ireland, and appears to be targeting The Irish Times online. It has been pushing itself with offers, free iPads, and cheap subscriptions.

A further push into the Irish market by any Murdoch organisation is not desirable from the NUJ's perspective. The Murdoch empire does have a political agenda, one that is often framed within a British context and then exported to another country, as if it was not an independent entity.

The Sunday Times, for instance, fought against the introduction of the Press Council of Ireland and all three newspapers have had a decidedly anti-EU policy. They have also refused to recognise or negotiate with the unions, in line with their UK policy, even though there is very large NUJ membership in Ireland among journalists. Most Irish journalists employed on News Corp newspapers in Ireland are members of the union, but the NUJ is not recognised by their employer.

There have been a number of reports recently that have highlighted media ownership in Ireland. Concentration of media ownership is at a dangerous level in the country, mainly due to Dennis O'Brien's involvement in radio and Independent News and Media.

It is the NUJ's view that the situation will get much worse in Ireland if Murdoch's control over Sky is increased.

Australia

Australia has one of the most concentrated media industries in the world. In many parts of the country there are print news monopolies, often controlled by News Corp and controlled by the Murdoch family.

Adelaide, the historic home of the Murdoch family empire, is famously a "one-paper town"; the Adelaide Advertiser.

In cable television, the News Corp owned Foxtel operates a practical monopoly, although it now faces competition from companies such as Netflix and the locally owned Stan digital television service.

It is a long-held position of Australia's journalist union, the Media, Entertainment & Arts Alliance, that this historic concentration of ownership of news media is detrimental to media plurality and a healthy democracy.

Despite some diversity emerging in digital and online media, MEAA believes that further concentration of ownership through mergers and takeovers will lead to more job cuts and fewer voices in the media.

This has a particularly harsh impact in regional areas. Australia's department of communications in 2014 noted that "most regional markets ... tend to exhibit higher levels of media concentration and more limited diversity".

The recent sale of the smallest commercial television network in Australia, Ten Network, to CBS was welcomed by MEAA. The administrator of the Ten Network in September rejected a rival bid to purchase the network led by Bruce Gordon and Lachlan Murdoch.

The Murdoch controlled Foxtel Network in Australia operates an effective monopoly in direct broadcast satellite and cable television.

Australian consumer group Choice in 2014 said that Foxtel's effective monopoly in cable television meant consumers were paying up to 400 per cent more than viewers in the US and UK to watch popular programs.

Until recently, Australians were also the most likely to unlawfully download (or 'pirate') programs such as Game of Thrones, which are delivered via Foxtel.

In the wake of the phone hacking scandal in Britain, Australia's publishers, including News Corp, agreed to revamp text media self-regulation through the Australian Press Council, of which MEAA is a member.

The MEAA shares the same concerns as the NUJ about any media concentration that leads to the undermining of the diversity of views, the loss of jobs and a decline in the working conditions for journalists.

Media power

If the Fox Sky merger goes ahead the NUJ believes it would boost the existing power and influence Rupert Murdoch already exerts within the UK.

It should not be possible for newspapers and broadcasters to be bought and sold on the whim of one man, or one family, or one corporation, or used as pawns to further an individual's commercial or ideological interests.

We absolutely reject the claim that Murdoch's increase in control of Sky would make no difference to the broadcaster.

Clive Soley MP told the House of Commons in July 2011 that he asked The Sun about allegations of sexual harassment at the newspaper and claims that News International had paid £500,000 "hush money" to the victim in order to buy her silence. The MP accused the editor of The Sun at the time, Rebekah Wade, of trying to stop an investigation into the scandal and writing a threatening letter to Soley.

Soley said:

"It must be a matter of serious public concern when a major multinational media group uses its editors to threaten a member of parliament who is carrying out a legitimate inquiry into that group's employment practices."

Alan Rusbridger, the former editor of The Guardian, has said that "something was dangerously out of kilter" when MPs such as Adam Price, who at the time was on the culture, media and sport parliamentary select committee, confessed he had been "held back" from probing News Corporation's affairs because of "fear of what that company might do to them" - or when former employees are "too frightened to speak publicly about what they know".

The Leveson inquiry part one looked at the relationship between politicians and the press. The revelation that members of parliament, lawyers and witnesses to the telephone hacking affair were spied on by private investigators is further evidence of the carrot and stick methods used by Murdoch's loyal servants.

Although Leveson commented on various UK national newspaper owners, it was only about Rupert Murdoch that he said:

“All the politicians who gave evidence before the inquiry said that Mr Murdoch exercised immense power and that this was almost palpable in their relations with him. Mr Blair spoke in terms of his acute awareness of the power that was associated with him.”

In 2011 Prime Minister David Cameron said that “never again should we let a media group get too powerful” and in 2012 he added:

“I think on all sides of the House there’s a bit of a need for a hand on heart. We all did too much cosyng up to Rupert Murdoch ... The problem of closeness between politicians and media proprietors had been going on for years and it’s this government that’s going to sort it out.”

However, and years later, Murdoch and his executives continued to gain access to senior figures within government. From April 2015 to September 2016 they met with either the Prime Minister or Chancellor at least 10 times – the highest number of meetings granted to any one private company or individual.

We believe it is the duty of both politicians and the regulators not just to consider the media companies and shareholders involved in this merger but to work primarily in the interests of the public they are there to serve.

Opposition to Murdoch

At the NUJ delegate conference in April 2011 the union agreed the following policy relating to the media industry:

“This Delegate Meeting is alarmed at the continuing growth of the Murdoch media empire in the UK and Continental Europe.”

“This Delegate Meeting believes that the practice of phone-hacking and the entrapment frequently employed by the News of the World without public interest justification are a disgrace to journalism. The disgrace is compounded when the industry’s supposed self-regulatory body attempts to brush aside or cover up allegations.”

The Trade Union Congress (TUC) is the policy making body of the trade union movement as a whole in the UK. The annual Congress meets every year and motions are proposed and

discussed. The TUC represents 6.5 million working people through its 58 affiliated UK unions. At TUC Congress in 2011 the following policy was agreed:

“Congress is appalled at the culture of journalism fostered at News Corporation and condemns the use of illegal methods to intrude into the lives of members of the public in pursuit of profit rather than quality journalism.

“Congress welcomes the inquiry into media ethics and believes that genuine investigative journalism, freedom of expression, diversity and plurality, limits on cross-media ownership and trade union recognition must be key principles underlying media regulation.”

In April 2014 TUC general secretary, Frances O'Grady, said:

“A mature, vibrant democracy needs citizens that have access to a range of arguments, news, information and opinions. International studies show the best-functioning democracies - those least susceptible to political and business corruption - have many newspapers and an independent media.

“Trade union leaders and their members are just one of the groups that are routinely treated as outsiders, ripe for caricature rather than fair reporting. And we have it much better than some other groups such as benefit claimants and migrants.

“The Leveson inquiry showed exactly how concentration of media power, in a few pairs of hands, corrupted the relationship between politicians and the press and the police. Politicians of all parties paid homage at the court of Rupert Murdoch.”

In March 2017, twelve UK trade unions came together to express their concerns about the proposed merger of Fox and Sky. They stated their opposition to the bid on the basis that it would harm journalism, media plurality and democracy. The unions included the TSSA, NUT, RMT, BFAWU, POA, NAPO, Unite, URTU, Prospect/BECTU, GMB, PCS and the MU.

Also in March this year, the International Federation of Journalists (IFJ) expressed its opposition to the Fox Sky merger. Anthony Bellanger, IFJ general secretary, said:

“Media plurality is a cornerstone of democracy. Without it, all the talk of a free and independent media is nothing but empty words. We want to see action at a UK and European level, not just to defend but also to extend media plurality and diversity. In today's troubled world citizens need to have access to diverse and reliable news sources - this proposed merger reduces plurality and undermines diversity - as such it is clearly against the public interest.”

The IFJ is the global federation of journalists unions and associations representing 600,000 journalists in 167 unions in 141 countries - including all the countries where Fox and Sky operate. The IFJ reaffirmed its opposition to the merger on the grounds that it acts against citizens' interests, undermines media plurality and gives undue influence to one family.

Conclusion

Sky News must not be put in a position of compromising its editorial responsibility as a result of Murdoch's ideological allegiances.

We would strongly urge the CMA to stop one of the UK's most trusted broadcasters becoming another plank of the Murdoch family's power.

The workplace cultures and treatment of staff highlighted in this submission must be taken into account and should not be allowed to develop at Sky.

In addition, an overwhelming majority of the British public do not think the Fox and Sky merger should go ahead.

For the sake of our democracy, no media group or one family should be allowed to achieve such media domination.