

Media Reform Coalition

Submission of evidence to the Commons Select Committee on the Future of Public Service Broadcasting

16 June 2020

Call for Evidence

We welcome the opportunity to respond to this important inquiry. Since 2011, the Media Reform Coalition has been at the forefront of the media reform movement, producing evidence and giving oral testimony to a broad range of public inquiries into the media. Our particular concerns relate to the sustainability of media accountability, democracy, pluralism and as such, the future of public service media is central to much of our research, analysis and advocacy.

What value do PSBs provide to the UK?

Public service broadcasting is all too easily reduced to the content provided by the BBC. This is not the case. Public service refers to a wider media ecology and set of regulations that foreground the public interest ahead of economic or partisan political interests. Its underlying principles ought not to be reducible to narrow concepts of 'value for money' or the 'national interest', but to commitments to universality and citizenship, independence, transparency, redistribution and diversity (Puttnam 2016). Public service media environments have demonstrable political and cultural benefits. Research (for example, Curran et al, 2009) shows that where independent and viable public service broadcasting (PSB) exists, citizens are better informed about public issues.

However, the independence and viability of PSB needs to be constantly renewed if it is to positively shape a broader media ecology in the digital age. The BBC is often held up as the model of public service broadcasting, yet over the last three decades its independence has been steadily eroded and its programme making increasingly commercialised. In recent years in particular, its funding has been severely cut and its editorial culture has become increasingly conservative.

Is the current regulatory framework for PSB fit for purpose?

Broadcasting in the UK was originally regulated according to public service principles, but this model has been increasingly marginalised, with all PSBs increasingly subject to a market-based regulation. The BBC's activities are monitored – through public value tests – in terms of their impact on the wider media market and also subject to market impact assessments by Ofcom, a communications regulator that was set up to privilege consumer interests over those of citizens.

Regulation of public service media should move away from a 'market failure' model in which the BBC, Channel 4 and other PSBs are expected to provide what the market will not, to a model in which public and democratic programme making, and rigorous professional standards, positively shape the broader media ecology.

We propose the creation of a new public media regulator that will act purely in the public interest. It should be responsible, among other things, for the regulation of the BBC and

the other PSBs, as well regulating standards in commercial broadcasting. It should consider the most appropriate funding mechanisms for PSBs and periodically review the BBC's constitutional remit and the operating licences of other PSBs.

How would representation be protected should changes be made to the PSB model?

Representing the full diversity of the UK in relation to all demographics and backgrounds is an essential feature of a meaningful PSB. Many providers have by now acknowledged the need to address the question of diversity in both their programming and workforce, but we remain a long way from seeing the kind of decisive action necessary to secure the full participation and representation of minority communities. The hugely important campaigns around, for example, Black Lives Matter and #MeToo in recent years have drawn attention to the discrimination and lack of representation that exists both on and off screen. This needs urgent systemic repair.

Ensuring adequate diversity will require complete transparency about the makeup of the public service media workforce. This will mean publishing rigorously collected equality monitoring data at the programme and production level for all content producers, whether in-house or external. This should include data on social class, as well as age, gender, sexuality, ethnicity, religion, disabilities, and other characteristics.

Delivering on diversity will also mean addressing the casualisation, in particular, of the BBC's workforce over the last three decades. Precarious working conditions narrow the range of people able to produce programmes, disproportionately impacting on those from lower income families, women, minority groups, and those with disabilities. All public service content providers must not only ensure the needs of such groups are adequately met, but must also re-establish themselves as a provider of expertise for industry professionals, identifying and targeting under-represented and marginalised groups in its training.

How can we protect accessibility of PSB services?

Access to information and culture should be a right. This means ensuring that marginalised groups are not excluded. The BBC licence fee, which funds a large proportion of the UK's PSB content, is a flat tax that disproportionately falls on low income groups. This has been compounded by the withdrawal of the government subsidy for the over 75s. This inequity needs to be addressed with a new system of guaranteed and politically independent public funding. A new digital licence fee would have to ensure equity and universal access. Such a system would also have to be underpinned by universal public digital infrastructure. With the shift towards digital delivery, it is vital in order to maintain universality in PSB, as well as to guarantee citizens' equal rights to access information, that high quality broadband is made universally available. A public guarantee of full-fibre broadband to all households should therefore underpin a new public digital media system.

What should a PSB look like in a digital age?

Giant global technology firms dominate our digital lives, extracting our data for profit and controlling what we see online with minimal regulation. The dominance of platform monopolies, the funding and regulatory advantages of companies like Netflix and Amazon, and politically motivated attacks on the principles underpinning PSB all have a direct bearing on public service media's capacity to support freedom of expression and

inclusive public debate. We need innovative solutions to these problems with a view to safeguarding both media freedom and access to diverse and credible sources of information, education and entertainment online.

Public service content should be freely available to, and should equally serve, all citizens. This means adapting the principles of public service broadcasting for the digital age and ensuring that existing PSBs are adequately funded to meet this challenge. It will also require the creation of new public media organisations to work in partnership with the 'legacy' organisations as part of a new public digital media ecology. Public media content needs to be delivered in the future through modern, democratised digital public platforms and networks operating autonomously of government and the market. In particular:

- Governing bodies of all public media providers (i.e. both existing PSBs and any future public models) should be elected by citizens and include staff representation.
- An independent non-market regulator should oversee the constitution of the organisations involved, standards of democratic governance, journalism and programme making. It should also be responsible for overseeing the funding available to public media providers, acting solely in the public interest.
- Programme making and editorial functions should be decentralised and devolved to the nations and the regions of the UK with a system of localised, democratic management and commissioning established to better respond to local needs, create better relationships between producers and citizens, with more sensitivity to local social concerns and community wealth building. Regional boards should be elected by staff and citizens in the same manner as the national board and run democratically.
- New public media organisations should be created to provide a public alternative to privately owned digital platforms. These should be democratically organised and run, generating pioneering digital content, developing innovative technological solutions to advance democracy and harnessing data for the public good. This would be the best way of safeguarding the future creative and informational needs of publics in the face of constant market encroachment into public services.
- Net neutrality legislation should be in place and enhanced and expanded to address the myriad ways in which network operators can promote or demote particular content or services based on their ability to pay. This would help to guarantee a more equitable arrangement for public service media providers.

These requirements are the minimal benchmarks for ensuring and protecting a plural, sustainable and diverse public service media ecology that can contribute to a healthy democracy. Without the above reforms, our public service media will become less relevant and trusted and increasingly subject to market pressure and elite capture at a time when we need a robust and independent public media system.

For more information, please email Des Freedman or Tom Mills at info@mediareform.org.uk

References

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Puttnam, Lord (2016) *A Future for Public Service Television* (London: Goldsmiths), available at futureoftv.org.uk