



Media, Communications &
Cultural Studies Association

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**Response to DCMS Inquiry into
THE FUTURE OF PUBLIC SERVICE BROADCASTING**

22 April 2020

This response to the Consultation is from MeCCSA (Media, Communication and Cultural Studies Association - the subject association that represents those who undertake research into or teach about media and communications in UK Higher Education). It draws on a wealth of well-informed academic research about PSB which is available for reference. The Association's view is that any review of the future of PSB should be thoroughly informed by the lessons of such research. More information about MeCCSA can be found at:

<https://www.meccsa.org.uk>

Question 1: Regulation: Are the current regulations and obligations placed on PSBs, in return for benefits such as prominence and public funding, proportionate? What (if any regulation) should be introduced for SVoDs and other streaming services?

The UK has a unique PSB system comprising the BBC, ITV, Channel 4 and Channel 5, which operate throughout the UK, and STV, S4C and UTV, which operate in Scotland, Wales and Northern Ireland respectively. Research carried out by Ofcom, the BBC, Parliamentary Committees and independent academics from across the UK HE sector confirms that PSB is generally highly valued by citizens across all parts of the UK for the crucial role it plays in national life and in supporting the UK's creative economy (Iosifidis, 2015; Ofcom 2016; 2018, Ramsay, 2017). As noted by the Lords Select Committee on Communications and Digital (HoL, 2019: 11), the duties of PSBs include:

- Universality—serving all audiences and free at the point of use
- Impartiality—balanced and accurate news coverage of the UK, nations and regions
- Programming quotas for independent productions, original productions and news
- Regional production and regional programming obligations
- Provision of children's programming.'

While wide-ranging, the duties and obligations placed on PSBs in principle *are* proportionate in return for appropriate levels of prominence and public funding. Funding must be commensurate with the role expected of PSBs in sustaining and enriching UK national life and in supporting the UK's wider creative industries (Tambini, 2014). The threat to future funding of PSB implied by the recent consultation (DCMS, Feb 2020) on decriminalising TV licence evasion, which ignores the conclusions of the Perry Review (2015), is wholly at odds with emerging evidence that, as far as UK citizens and audiences are concerned, PSB is more trusted and seen as a more valuable and vital component of the media landscape than ever (Ofcom, 2020).

At a time when the audiences, subscription revenues and commissioning power of global streaming services are growing, it makes sense to review how regulation can be extended in order to bring improve alignment between the commercial strategies of SVoDs and wider public purposes. As recent research has shown (Ampere Analysis, 2019; Doyle, 2019; Hesmondhalgh and Lotz, 2020; Milano, Taddeo and Floridi, 2020; Potter, 2018), areas ripe for consideration include how to encourage more investment by SVoDs in content that truly reflects the interests and concerns of UK audiences, including at regional level; how to prevent unhealthy monopolisation of data and ensure that the design of algorithmically generated recommendation systems takes account of societal aspirations; and how to extend the so-called 'terms of trade' governing commissioning of content from independent producers to ensure that the latter can retain a greater share of ownership in IPRs in programmes that they make for SVoD platforms.

Question 2 Representation: How would representation be protected if changes were made to the PSB model? How would the nations and regions be affected by changes to the PSB model? Is the 'quota' system the most efficient way to maintain and improve representation in broadcasting?

An abundance of academic and industry research highlights how PSBs are major investors in original creative content to the benefit of audiences at national, regional and local levels (Harvey, 2020; Iosifidis, 2015; Ofcom 2019; Steemers, 2017). While the growth strategies of global streaming services have involved investment in some high profile locally-relevant television content, it remains that UK PSBs are responsible for commissioning and producing a far greater range and depth of original programming across all genres that reflect and resonate with the concerns, past and present, of UK audiences, including minorities (Freedman and Goblot, 2018; Ofcom, 2019). The long-standing commitment of PSBs to provision of culturally and ethnically diverse minority programming to audiences that are often ignored by commercially funded broadcasters is also important in promoting social cohesion (Malik 2013). Therefore the PSB model, with its emphasis on indigenous and diverse regional and national production, remains an indispensable means of sustaining and supporting diverse representations within UK broadcasting.

Recent research confirms that the regional 'quotas' that Ofcom imposes on UK PSBs are effective and efficient in ensuring that localised programmes, including regional news, can be seen across different areas of the UK and that a proportion of PSB broadcast output is made in local areas outside of the M25 (Ofcom, 2019). Therefore the continuation of quotas means that viewers across the UK benefit from a diverse range of programmes, forms of representation and editorial perspectives. As an additional benefit, the current system of quotas, which is effective in ensuring that a suitable proportion of PSB's network programmes are made outside of London, also support regional economic development and employment in TV production across the nations and regions of the UK, ensuring that the success of UK's creative economy is widely spread.

Question 3 Accessibility: How would changes to the PSB model affect the accessibility of services? How would a wholly internet-based service compare to the current PSB model?

Universality of access has been a core principle of public service broadcasting since its inception (Born and Prosser, 2001) and, despite changes in modes of distribution and consumption of media, universality – i.e. access free at the point of use after paying the licence fee - remains an essential feature of PSB in the UK. PSBs clearly need to be on those distribution channels and platforms that audiences have access to and are using. So as viewing patterns shifts, PSBs need to extend distribution across additional forms of distribution so that audiences, including young people, have access to PSB content and so that programmes are easy to find (Donders, 2019).

However, mindful of the needs of a significant proportion of the UK population which still relies on being able to access and enjoy PSB content via broadcast television and radio (Ofcom, 2019), PSBs *must* remain on broadcast channels too. A switch to a wholly internet-based service would be inappropriate because it would reduce or remove access to PSB for some older people, those on lowest incomes and other vulnerable groups in society who lack internet access. Recent research from Ofcom on levels of access and inclusion in communications has indicated that 13% of adults in the UK do not use the internet. The most financially vulnerable are less likely to have access to broadband internet and only 67% of disabled people in the UK use the internet (Ofcom, 2019). Therefore, a switch to online-only provision of PSB would have significant adverse socio-cultural impacts and cause disproportionate harm to already disadvantaged and vulnerable groups in our society. Continued access to PSB via broadcast television and radio is essential.

Question 4 Impact: What value, if any, do PSBs bring to the UK in terms of economic (local and national), cultural and societal impact?

PSB in the UK has a long and proud history of delivering economic, cultural and societal benefits and, in an ever-changing media landscape, it continues to deliver positive impacts (Freedman, 2016). Research from Ofcom shows that audiences value PSB highly and recognise that it provides major societal benefits through delivering impartial news and providing UK-originated programmes and distinctive content (Ofcom, 2018).

PSBs deliver cultural benefits by creating and providing distinctive content, including in specialist areas such as religion, arts, music and children's programmes. They deliver impact by providing both the sort of content that brings the nation together and also that reflects the diversity of the UK's nations and regions (Ramsay, 2017). There is especially strong evidence of audience satisfaction with the UK system of PSB in the area of news coverage (Ofcom, 2018). But the presence of a robust PSB system brings wider socio-cultural dividends, for example by encouraging and supporting provision of quality programming across the board from non-PSB rivals, to the benefit of audiences (Thoday, 2018). PSB, rather than merely filling in gaps, 'raises the level' of what the market provides (Oliver, cited in HoL, 2019).

The societal value of PSB has never been more evident than in the current public health crisis surrounding COVID-19. For example, research from Havas Media (2020) confirmed that the BBC has become the most-trusted news brand on coronavirus and likewise data collected by YouGov and the *Sunday Times* (2020) shows that large numbers of UK have turned particularly to the BBC for information about the health crisis. Academic researchers have pointed to the ways in which the education and entertainment roles of the BBC have also been powerfully activated by the current crisis (Hardy 2020).

As major investors in creative content PSBs also deliver enormous economic impact. Through their frontline role in making and commissioning content, both mainstream

and esoteric, PSBs provide a bedrock of support for British creative ideas and story-telling and they represent ‘a vital resource for nurturing talent’ (Thoday, 2018). Independent research confirms that PSBs in the UK play a major role in commissioning content from smaller independent producers and in this way they contribute substantially to the sustainability and renewal of the UK’s television production sector which is an exceptionally successful component of the UK’s creative economy (Bazalgette, 2017; Bennett, Strange, Kerr and Medrado, 2014; Lee, 2018; Ofcom 2019).

Question 5 Looking ahead: What should a PSB look like in a digital age? What services should they provide, and to whom? In what way, and to whom, should they be accountable? Is the term ‘public service broadcasting’ still relevant and, if not, what is a suitable alternative?

It is widely acknowledged that, as audiences migrate to new platforms, PSB must adjust and redefine itself for the digital era (Brevini, 2013). A wealth of academic research, while acknowledging these forces, has concluded that UK PSB remains highly valued and its main challenge is to find ways of using new digital platforms to strengthen how it delivers its core mission of educating, informing and entertaining, while adhering to principles as universality and impartiality, and supporting regional and independent production (Freedman and Goblot, 2018; Gibbons 2017). Research, both empirical and theoretical, has underlined how the UK has led the way by providing a set of principles for PSB that has been widely adopted in other countries. The UK is also seen as a pioneer in adapting its systems of PSB to the digital environment, for example through creation of the innovative BBC iPlayer (Grainge and Johnson, 2016). However the challenges that PSBs face in adapting to transformations in the media environment are ongoing. To sustain its legitimacy, the UK’s system of PSB needs to maintain wide appeal and to avoid the sort of ghettoization that, for example, characterises PSB in the USA.

In an era of when PSB content is delivered via an array of differing platforms, the term public service broadcasting might well be replaced by public service *media* (PSM) (Bardoel and Lowe, 2007). Much audience research exists to show that in the current era the underlying concept – whether PSB or PSM - resonates with and remains as highly valued by UK citizens as ever it has been (Donders, 2019).

A PSB in the digital age, while harnessing all the potential offered by new platforms, should, in line with the past, serve audiences by providing impartial and accurate news and high quality, distinctive output across all genres. In a television environment increasingly shaped by the spending power of global streaming services, PSBs should play a vital role in sustaining local creativity and story-telling and in supporting the production of distinctive home-made British content. A PSB for the digital era should be central to the UK’s creative media ecology and should reflect, represent and serve diverse communities and all age groups across the regions and nations of the UK.