

Written evidence submitted by Decentered Media Ltd

Future of Public Service Broadcasting - DCMS Committee Call for Evidence

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This is a submission in response to the call for evidence on the future of Public Service Broadcasting by the Digital, Culture, Media and Sport Committee. Decentered Media is an independent consultancy, research and training organisation, specialising in community media practices, governance and organisation development. Decentered Media advocates for the establishment of decentralised, independent community media that is supported through volunteer contributions, and has a primary purpose to promote social value, social cohesion and social gain by supporting civic deliberation and grassroots media literacies.

Response Context:

- Public Service Broadcasting (PBS) in the UK is not keeping pace with changing expectations about civil society, including the practice of co-development and methods of civic deliberation.
- Public Service Broadcasting expectations are too narrowly defined around national and corporate administrative interests, with an excessive concentration on policy provision determined in London.
- Public Service Broadcasting as a set of working practices is too narrowly defined around corporate, industrial, commercial and economic objectives.
- The policy objectives of Public Service Broadcasting have become self-serving and unaccountable, serving a professionalised set of interests.
- Public Service Broadcasting is defined almost exclusively by national government and the media sector, operating within a paradigm of media regulation. This does not acknowledge wider forms of social, community and civic development.
- Public Service Broadcasting organisations are largely self-selecting and recruiting. Media producers are able to define their own development priorities, usually without reference to, or input from, dispersed local civic-sector organisations, community groups or local public bodies.
- Public Service Broadcasting suffers from a lack of diversified supply. There is limited inclusivity from non-traditional and emerging media practitioners at the lowest levels of engagement.
- Participation in Public Service Media is often limited to small-scale and tokenistic projects, which are narrow and limit access at the systematic level of corporate media provision.
- There is a lack of locally accessible and participatory provision of community media resources, which has led to a restriction of diversity of participation and opportunity at the lower local levels of supply pathways.
- The media literacies model defined and practiced by Ofcom is dysfunctional, lacking imperatives to actively and practically promote citizenship, social wellbeing, social cohesion, community development, public education and civic deliberation through and with media.

- DCMS policy practice and regulation is weighted unduly to a narrow model of market centralisation and consolidation, which crowds-out sustainable alternative local provision, and has resulted in waves of consolidation in local newspapers, radio stations and other independent forms of media.

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) must be introduced for SVoDs and other streaming services?

- The Public Service Broadcasting model is failing to keep pace with changing expectations about civil society engagement and regulation. The use of citizen juries, for example is expected to grow and become more common. The principles of civic participation through and with media, however, are largely absent from these discussions.
- There are few examples of corporate public service broadcasters using sustained and long-term co-production and civic deliberation techniques to determine editorial policies, programming priorities, and to ensure that they operate inclusive practices of service representation and accessibility.
- The Public Service Broadcasting model in the UK is too often justified using narrow audience development theories, which originate with commercial mass-communications and mass-media marketing models, and are unsuited to civic deliberation and community development practices.
- Public Service Media has been largely untouched by the introduction of the social value legislation and SROI models. There was little discussion of participatory media practices in the Cairncross Review.
- Public Service Media does not include community development practices, so there is no designated role for media in the task of long-term social change planning and resource provision. The UK Government's Civil Society strategy of 2018 failed to mention media in any form.
- The existing social gain model that is recognised by Ofcom in the legislation supporting community radio, while welcome, is limited and narrow, and needs to be expanded and refashioned to provide a practical model of community media engagement to include social welfare, social cohesion, integration, civic participation and media literacies.
- As dispersed networking and information aggregation technologies are now well established and commonly available, it feels archaic for legislation and regulation to be weighted to the continued support of corporate centralised and linear Public Service Broadcasting provision.
- Decentralised information management models, for example blockchains, are emerging rapidly in other sectors. Establishing viable decentralised media provision is likely to happen anyway as these changes accelerate. The work to making them accountable, as part of a rules-based and ethical civic environment, must be undertaken now, or the disruption that will be caused will be hard to re-regulate.

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?

- There needs to be a statutory guarantee that citizens have access to independent, locally run, self-governed, and accountable media, using the well-established community media, civic deliberation and social value communication models.
- DCMS, the Office of Civic Society and Ofcom, must be given a statutory duty to provide practical, technical and financial support for community media groups and organisations, who are required to serve and support communities of interest, identity and place in order

to ensure the development of locally determined news, information, discussion, entertainment and media of non-mainstream cultural interest.

- Community media, as with other civic-sector and community organisations, are a patchwork of disaggregated volunteer organisations, and must be recognised as such in policy development and planning. The diversity of community media is its strength.
- The Office for Civil Society must take over primary responsibility for the regulation of community media provision, and bring it into line with expectations about the social sector and organisations recognised under social value ethos and legislation.
- The Social Value Act legislation and guidance needs to be updated to specifically include local, independent and community media, to support the provision of news, information and public welfare services.
- Local authorities and public bodies must be able to invest in community media organisations with confidence, and as part of an alignment with other social sector organisations. Community media is unrecognised in its community development role.
- The Office for Civil Society must support community media provision by prioritising policy, legislation and resource that focus on social wellbeing, health, civic and community development, civic and media literacies education, inclusive access and participation in self-governed media services, and the integration of these services with the wider social sector and the public sector.
- The implementation of quotas is useless on its own. They need to be supported, instead, by active provision and the building of community capacity, experience, infrastructure and the resources that can provide opportunities for inclusive and experiential learning from non-traditional communities who would otherwise be excluded from mainstream media provision and decision making.
- The infrastructure to support media diversification must be sustainable at the lowest level of local provision. As with other parts of the social sector, this will range from well-established organisations with recognised governance structures, but it must also include community groups that are ad-hoc, temporary, shifting and dependent on provisional resources.
- Diversity and temporary community media must be recognised as a vital creative space for experimentation and innovation.
- If the opportunities to learn and practice are not available at the lowest, most informal level, then representative people cannot be embedded elsewhere in the media economy.

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?

- Accessibility is not simply about delivery platforms or technical production skills - it is about participation opportunities and access to those platforms.
- The role of public support for media must prioritise investments in training, experiential learning and participation.
- The Audio Content Fund, for example, must be reformed to exclude profit-based media organisations, unless they can substantially demonstrate the implementation of social value priorities, i.e. skills training and participation, in the practice of content production, not just in the subjective and self-determined provision of alternative content for audiences.
- Public Service policy focus, therefore, must be widened to include active and developmental support for civic and community media literacies and capabilities.
- These media literacies must be available locally (i.e. practically within reasonable public transport use distances) and in-situ within the communities being served.
- Diverse communities with different needs must be supported to make their own media.

- The media platforms and tools that non-professionals use to make their own media have been readily available and accessible for some time, what is missing is the widespread public advocacy and support for the legitimisation of the role of community media.
- There is strong advocacy for independent news by the Public Interest News Foundation and the Independent Community News Network. A similar set of bodies and specialist research centres need to be established to support participatory community media.
- Recognition in policy development terms, then, of the difference between social media, community news and participative community media must be a priority.
- The BBC Local News Partnership must be reformed to support emergent and developmental organisations to build their capacity to contribute independently to the production of local news and information.
- The core principles of community media are accountability and trust through transparent and open governance, something that social media platforms and companies do not attend to. Social media is often less trusted because it is predicated on opaque algorithms that are not open to public scrutiny.
- Social media platforms clearly suffer from a lack of local accountability, therefore a sustainable and resilient alternative media embedded in the social sector needs support.
- The Focus on legacy provision of services, however, must not be lost, regardless of how attractive or persuasive new media technologies look. Legacy forms of media still provide, and will continue to provide, valuable forms of community interaction that are cheap to operate, and which require relatively minor technical skills to manage, and which can be easily locally placed and managed by non-experts.
- Radio, for example, remains one of the most trusted and simple models of communication.
- Community radio must be given a renewed mission to foster and support local community services, discussions, news, information and cultural enrichment, not just as a uniform provision for audiences, but for a participative model of co-development and engagement.

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

- Diversification and decentralisation of the Public Service Broadcasting model will enable more independent actors to operate in a diversified economy, hence promoting innovation and knowledge exchange. The size and scale of an organisation does not lead to efficiency, as resources leave local communities.
- Tests for social value and social gain, therefore, must be applied to any and all public subsidy to media organisations, both direct and indirect, to ensure that they are making a substantive difference to local social circumstances, social cohesion and community development.
- The test for social value must be independently verified, based on established and well-practiced models used in the civic and social sector.
- Pluralistic and decentralised models of commercial interest, which provide an alternative to the globalised and conglomerated services of the international players, will take a long time to nurture and grow, but there is an increased likelihood that resource will remain in communities, and will not be re-exported to distant centres of operation.
- Policy timescales must be set, then, for the long-term and foster cross-party backing to enable continued support as economic, social and technical factors shift.

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

- Digital services are not the only route for development of Public Service Media in the future, though they will help to support more open, participative, collaborative, and self-governed models of self-determination.
- Public Service Media policy must be actively decentralised on a distributionist model: that which can be done at the lowest level, must be done at the lowest level.
- Long-term investment must be established to allow for experimentation and support for alternative social funding models, such as local community media mutuals, cooperative and members-based media organisations.
- Policy makers and funding organisations must adapt to asymmetric outcomes and responses, and learn to adapt to flexible and quick forms of investment.
- Community and civic media as a social value practice must be established as a core part of the community, social and civic development curriculum.
- The media studies and media production curriculum must be reviewed to embed civic and social value principles and practices.
- A consortium of organisations must be brought together to establish an independently validated leadership qualification to support advocates of community media and social value communications within public and social sector organisations.
- A consortium of organisations must be brought together to establish an independently validated organisation benchmark or quality-mark to identify threshold standards for advocates and practitioners of community media and social value communications within public and social sector organisations.
- Community and civic media need government support and advocacy to gain parity of esteem with other social sector organisations, within public authorities, within civic sector organisations, charities, and other professional bodies.