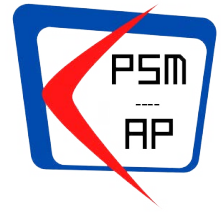# Future-proofing the UK's Public Service Media

Lessons from a comparative analysis of seven media markets

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Public service media across the world have consistently faced different forms of societal and technological transformation. However, the rise of global platforms has brought new challenges threatening the legitimacy of public service media and impacting broadcasters. In this context, we present results from research conducted during the first year of PSM-AP, a large-scale comparative research project analysing Public Service Media in the Age of Platforms. Our aim was to understand the impact of platforms and platformisation on current media policy through conducting analysis of media laws, broadcast contracts and licences, annual reports, and current policy debates. This brief presents core findings of our analysis of media policy in the UK and proposes recommendations for better supporting UK public service media in the platform age.

Public Service Media in the Platformised Marketplace

Global platforms have transformed the media landscape, generating challenges for PSM. These players compete directly for viewer attention, putting pressure on existing viewing habits, and making it more difficult for PSM to reach all audience groups, specifically younger viewers. As a result, PSM are developing new 'online first' programming strategies.

PSM now operate in a marketplace that global platforms control. PSM are dependent on third-party streamers (resulting in co-production deals) and social media platforms for reaching younger audiences. In addition, PSM are increasingly reliant on platforms for infrastructure needed to run online services (such as, content delivery networks, like Amazon Web Services, and app stores) and third-party device manufacturers that control how content is discovered. These dependencies have driven structural imbalances in the media market, which increasingly runs on the extraction and manipulation of vast user data that is used to shape behaviour. As platforms operate across multiple markets, the scale of data extraction gives them gatekeeper power over the PSM organisations against which they compete.

In this context, PSM need to balance platform tactics, such as personalisation, with their public remit. In the UK, these challenges are made more acute by increasing financial pressures and uncertain political support. After recent proposals to privatise Channel 4 and continuing attacks on the BBC as we enter a period of Charter renewal, it is imperative that transparent discussions are had on the future of public service media.

Despite these challenges, we found clear consensus on the social, cultural, economic and civic benefits that PSM provide; from bringing the nation together and championing diverse British content, to helping fight disinformation, and promoting independent production across the UK's regions and nations. The recent draft Media Bill gives the UK a headstart, compared to other nations, in tackling many issues that broadcasters face in the new media marketplace. In particular, the Bill provides leading legislation for prominence of PSM content and services.

PSM policy has responded to the platform era...

- The **Media Bill** extends the public service remit online
- Allowing for **flexibility** in how the remit is met across broadcast and online
- **Channel 4's** model changed to respond to challenges of competition
- New **prominence legislation** tackles discoverability of public service content on UIs
- Encouraging **collaboration and innovation** among the PSMs (as seen in the announcement of Freely)

...but there are still challenges to resolve

- **Establishing** clearer understanding of public service values in the transition to 'digital first' strategies
- Responding to **structural challenges** of the platform media marketplace
- Regulating increasing **imbalances in scale** between national broadcasters and global streamers
- Developing regulatory principles for **meaningful algorithmic curation**
- Regulating **data collection and ethical use**

Redefining the Values of Public Service Media

Our research revealed ongoing difficulties in translating the values of public service media to the platform age. Declining audiences and an abundance of alternative forms of media led some to argue that universality – providing a freely accessible service that reaches and appeals to all audiences – was no longer relevant as an underlying principle of PSM. Even policymakers who continue to support universality struggled to pin down clear a definition in a context where providing meaningful content for all audiences is increasingly difficult and costly. Broadcasters have been left to develop their own principles for universality with no consistent approach. These debates impinge on other seemingly essential values for PSM – such as diversity, quality, innovation, and impartiality – and speaks to a wider need to redefine PSM for the platform age.

Key Findings

Policymakers agree that PSM remains as valuable as ever. But recent policy assumes a heavily market-orientated outlook when offering solutions to the challenges of platforms, which risks overlooking the social and cultural value of PSM.

Universality has emerged as a particularly contested concept. Policymakers are still largely attached to a definition of universality borrowed from broadcasting, and there is significant disagreement about the relevance of this concept to a digital context.
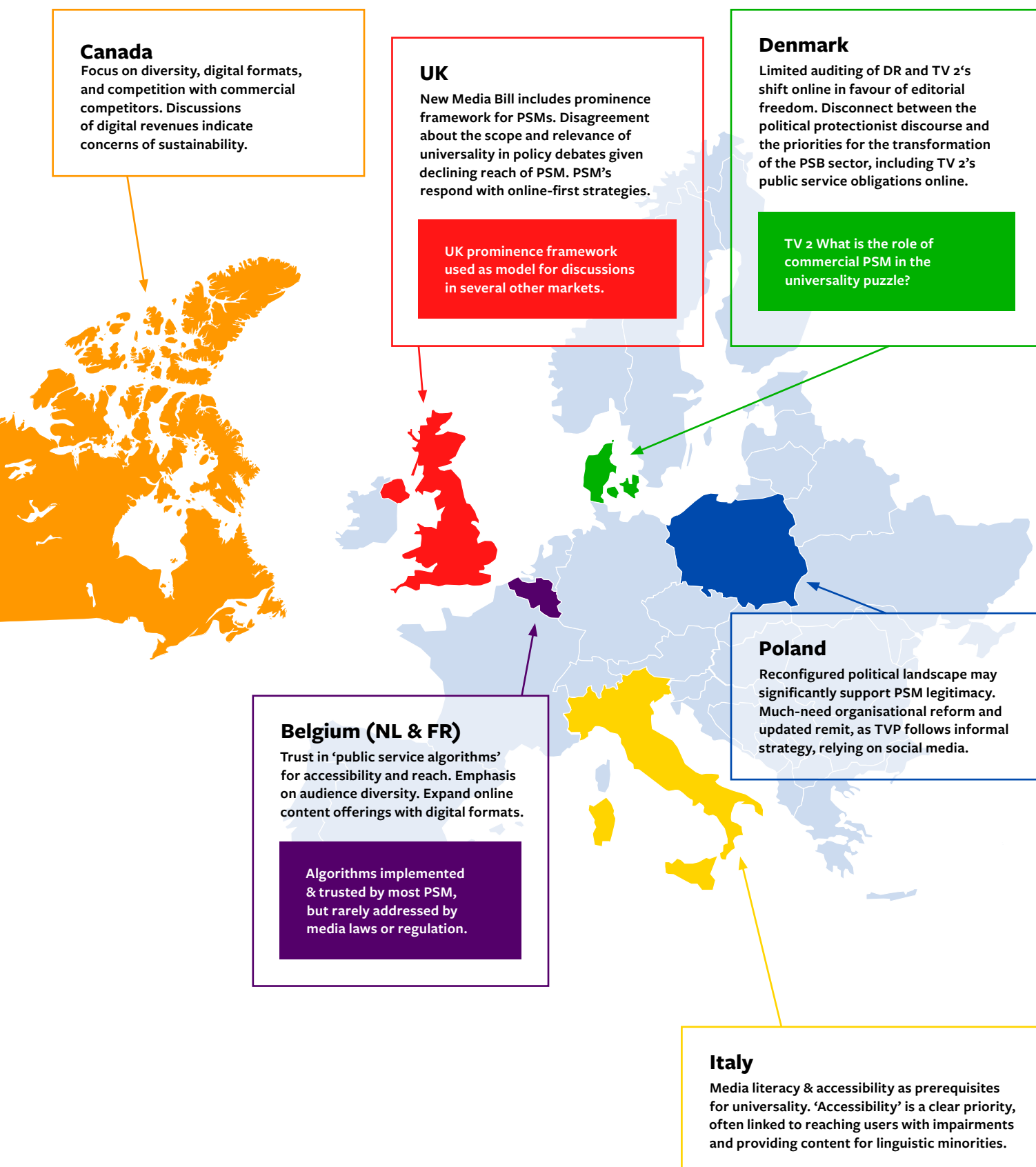
UK media policy has lagged behind and broadcasters have had to develop their own solutions for reaching audiences within outdated remits. The new Media Bill offers greater flexibility for how PSMs deliver content and services, but it doesn't tackle many ongoing challenges caused by platformisation.

PSMs are competing with global streamers that are operating at a much larger scale and with platforms that control key points of the online media infrastructure. Collaboration among PSMs, and with commercial operators, is the common solution offered but this fails to address wider structural challenges of the media marketplace.

While PSMs are heavily prioritising personalisation for their on-demand services, regulation of algorithms, recommender systems, and data processing is absent from current media law. Policymakers recognise the need for PSMs to adopt personalisation to ensure continued competition with commercial services, but there is no discussion on the values underpinning public service use of algorithms .

Core discussions in different markets relevant for all PSM

In the figure below, we present a selection of priorities and ongoing discussions in different markets, which are relevant across the cases. Noting that the socio-economic and political context is crucial to agenda-setting and shaping the regulatory framework, the dimensions of universality and audience reach, algorithmic curation, and media literacy are increasingly seen as core to the platformisation process of PSM across all cases

Canada
Focus on diversity, digital formats, and competition with commercial competitors. Discussions of digital revenues indicate concerns of sustainability.

UK
New Media Bill includes prominence framework for PSMs. Disagreement about the scope and relevance of universality in policy debates given declining reach of PSM. PSM's respond with online-first strategies.

UK prominence framework used as model for discussions in several other markets.

Denmark
Limited auditing of DR and TV 2's shift online in favour of editorial freedom. Disconnect between the political protectionist discourse and the priorities for the transformation of the PSB sector, including TV 2's public service obligations online.

TV 2 What is the role of commercial PSM in the universality puzzle?

Belgium (NL & FR)
Trust in 'public service algorithms' for accessibility and reach. Emphasis on audience diversity. Expand online content offerings with digital formats.

Algorithms implemented & trusted by most PSM, but rarely addressed by media laws or regulation.

Poland
Reconfigured political landscape may significantly support PSM legitimacy. Much-need organisational reform and updated remit, as TVP follows informal strategy, relying on social media.

Italy
Media literacy & accessibility as prerequisites for universality. 'Accessibility' is a clear priority, often linked to reaching users with impairments and providing content for linguistic minorities.

Key recommendations

Redefine universality for the platform age

- Instead of merely retaining or rejecting broadcast definitions of universality, policymakers urgently need to redefine what universal access and appeal mean in the platform age and consider how we measure it.

- This debate needs to consider the balance between linear and online provision, the role of PSMs on social media, and the responsibilities of the platforms providing the infrastructures within which PSM operate.

Address the structural realities of the contemporary media market

- While flexibility is necessary to allow PSMs to innovate in a changing market, media policy needs to go beyond hands-off competition approaches to produce regulation that accounts for the complexities of how platforms operate in the media market.

- PSM regulation needs to address platforms' gatekeeper position in digital media, their control over key infrastructure in data extraction and processing, and the competitive advantage they receive from operating across multiple markets.

Develop an integrated and pro-active policy approach to platforms and PSM

- A more integrated legislative approach is needed that brings together PSM policy with platform and tech regulation.

- Approaches to platform regulation need to look beyond competition policy and/or online harms, to consider the impact of platforms on public service media and the potential for PSMs to be used as a policy intervention to tackle problems raised by platforms (such as polarisation).

Legislate algorithms, personalisation, and data

- Media legislation needs updating to provide clearer guidelines on the use of viewer data, as well as the principles for PSMs' approach to personalisation. Other countries have begun this; for example, the Flemish broadcaster VRT have committed to a "taste broadening algorithm".

- Beyond PSMs, the use of algorithms within TV devices and platforms should be subject to regulatory scrutiny.

About our study

This study was based on a comparative policy analysis of ten public service broadcasters, both publicly and commercially-funded in six countries: Belgium (RTBF, VRT), Canada (CBC), Denmark (DR, TV 2), Italy (RAI), Poland (TVP) and UK (BBC, Channel 4, ITV). For this research, we analysed 61 documents including media laws, broadcast contracts and licences, annual reports, and documents detailing current policy debates. The aim was to identify how public media and governments frame challenges, priorities and policy needs for making the shift to a 'digital-first' public media institution amidst increasing competition from streamers and platforms. The majority of policy and strategy documents concern the period 2021-2022. Recent policy debates have also been considered for context.