



## Question

**Question 1: Do you agree that a new regulatory framework for Public Service Media (PSM) delivery should support a more flexible 'service neutral' delivery approach that is more outcomes focused?**

## Your response

Yes, I am positive about the opportunities for a new regulatory framework for PSM delivery, as long as it ensures the universality, prominence and public resourcing of the current public service broadcasters, while allowing new opportunities for public service partners and a new layer of social impact media.

In my attached report *Impact Media – Building Common Cause* (Ref.

<https://www.wcmt.org.uk/fellows/reports/media-ownership-and-funding-support-civil-society>), I

strongly argue that there should be support for and investment in a third layer of media, 'impact media' in addition to public service and commercial media. Now is the time, while ensuring we do not lose our unique public service and commercial media ecology, that in parallel the UK can invest in growing a third layer of media — civil society media, community media, media with social impact as its primary objective — impact media.

Many years ago we called this 'social action broadcasting', and our broadcast regulator over many decades both enforced and enabled this socially purposeful media to be accessible on peak-time mainstream TV and Radio, and on local community stations.

In my report I make five recommendations for the UK, which taken together and implemented widely, will, I hope, create a powerful and high impact network of flourishing, well-funded and well-governed civil society social impact media organisations, creating and distributing social impact content across our four UK nations, in our cities, towns and villages, using both digital and legacy media. These will be a catalyst for strengthening communities, citizen engagement, and for positive social impact for people and places.

As impact media owners and boards, as funders, philanthropists and investors, as community leaders, social policy influencers and regulators, we can come together to make this happen and build common cause.

**Question 2: Do you agree with our proposals for a clear accountability framework?**

Yes, I welcome that the interests of citizens, as well as consumers, should be foremost in setting the framework, and would like to see this emphasised more.

I would recommend that the current obligations on PSBs are maintained for a significant period – eg at least 20 years, but that additional obligations and accountability are built into the framework to allow for a widening of providers, platforms and partnerships, including a new layer of social impact media.

I agree that outcomes should be a key part of the accountability framework, and would welcome a stronger focus on outcomes that emphasise social impact, strengthening communities and civil society, both across the UK and globally.

I agree that Ofcom should continue to be the main regulator, but would recommend a review of Ofcom's own accountability – to ensure that it is cross-government in its accountability, and that it has a much stronger accountability mechanism into 'citizens' and communities across the UK. I would like to see Ofcom collaborating more effectively with other UK regulators, particularly the Charity Commissions, to enable more innovative forms of social impact media, both content and distribution, to flourish. (see my Impact Media report as above)

**Question 3: What do you think should be included in the PSM 'offer'?**

Universality and prominence is key for any PSM content. This should be much more widely promoted and understood by citizens as part of a 'social contract', involving access to what are 'public assets' of broadcast and broadband distribution and prominence, particularly on broadcast TV, in addition to public funds, tax relief and other benefits.

Universal access to broadband – both technical and affordable – is key to citizens' interests, and Ofcom should play a strong and proactive role in making this happen, and then safeguarding this. The UK remains woefully slow in ensuring this access, leading to growing inequalities and divides in access to education, information, skills and employment, health, community engagement and much more. This 'divide' has been further

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|   | <p>evidenced and reinforced across the UK during the COVID-19 pandemic.</p> <p>As detailed in my Impact Media report, the PSM offer should include new and current content providers from across the ‘third’ sector, the ‘social impact’ sector – non-profits, charities, social enterprises and more. The Ofcom consultation document makes scarcely any reference to this sector. Social impact in its widest interpretation, should be a key outcome for PSM.</p> <p>We should envision and make happen a network of creative impact media hubs across our cities, towns and villages, linked to impact media outlets, where communities can come together to create content, engage with media and each other, debate, have a voice, learn new skills, develop their own media initiatives, and much more. Our dying high streets and disempowered communities could be revitalised, creating vibrant community hubs, engaged story-tellers and a new layer of media social entrepreneurs. (See my Impact Media report as above)</p> |
| <p><b>Question 4: What options do you think we should consider on the terms of PSM availability?</b></p>                                      | <p>As in Q3, universality and prominence are key. Viewing of legacy media remains strong for a large proportion of UK citizens, particularly the older and less well-off demographics – the audiences that many of our public sector, charities and community organisations support.</p> <p>A deeper layer of community-owned, and citizen-owned media, on both legacy and digital platforms, from the most grass-roots to global reach, offers exciting potential for innovation, social impact and citizens’ interests. (See my Impact Media report, as above)</p>   |
| <p><b>Question 5: What are the options for future funding of PSM and are there lessons we can learn from other countries’ approaches?</b></p> | <p>The consultation leaves out opportunities to access funding from the non-profit, charitable and social enterprise sectors. In the US there has been a tremendous growth in funding via grants, contracts and impact investment, in public service media – content and distribution.</p> <p>The consultation document also leaves out opportunities to raise funds from individual contributions, via donations, membership, crowdfunding, shares, employee ownership and</p>  |

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|   | <p>other models, which again has grown massively in the US, and now in India. I would recommend that Ofcom should actively encourage and inspire a range of funders and impact investors to support social impact media. (See my Impact Media report, as above.)</p>  |
| <p><b>Question 6: What do you think about the opportunities for collaboration we have referred to? Are there other opportunities or barriers we haven't identified?</b></p> | <p>Collaboration and partnership is key to the future of PSM, and I welcome the ideas in the consultation paper. Partnership should be built into any PSB and/or PSM provider contracts.</p> <p>There is little mention in your document of the potential for collaboration with the non-profit, charity and social enterprise sector, where there is a unique mix of access to innovation, disadvantaged and marginalised communities, new voices, social impact, creativity and crucially, funds. In 2017/18, the UK voluntary sector's total <b>income</b> grew by 2% to £53.5bn (NCVO Almanac); The National Lottery proudly asserts to us, the public: "You've helped raise over £42 billion for over 625,000 projects." (Ref: <a href="https://www.lotterygoodcauses.org.uk/projects.">https://www.lotterygoodcauses.org.uk/projects.</a>) Collaboration and partnership with the National Lottery could result in both access to new funds for PSM, and diverse, innovative content, stories, voices, engagement and social impact. I would recommend that Ofcom should actively encourage and inspire a range of funders and impact investors to support social impact media and wider PSM.</p> <p>I would like to see more collaboration across UK regulators as well, to further and encourage social impact media. Ofcom should work more closely with the Charity Commissions across our 4 nations, and with other regulators involved in social impact media (see my Impact Media report as above)</p> |
| <p><b>Question 7: What are your views on the opportunities for new providers of PSM?</b></p>  | <p>I would like to see significant investment in a third layer of PSM providers coming from the social impact and charity sector, and including charities, social enterprises, non-profits, co-operatives and more. This should include both content providers and distribution platforms, from the charitable and co-operatively-owned national TV channel Together TV, through to grassroots local</p>  |

community newspapers (print and digital), and including a wide mix of legacy media and digital platforms, from local, regional, national and global. There is enormous potential to grow this sector, including in partnership with current PSBs and new PSM providers, alongside the commercial broadcasters, digital platforms and wider media and creative sector.

This would bring plurality, diversity, innovation and citizens engagement to the current and future PSM ecology, as well as access to new sources of funding – all of which areas should be emphasised in the next stage of Ofcom's thinking, and in the recommendations to Government. (See my Impact Media report.)

I would also like to see the concept of 'social impact' media being brought back into the PSM ecology, welcomed, encouraged, supported and celebrated by Ofcom.

I have been very disappointed at the impact of the new Local TV channels across the country, despite their access to unique prominence via Channel 7 EPG slot. This has been a missed opportunity, and does not reflect well on Ofcom's ability to regulate a more complex ecology of PSM. Indeed it is strange that there is no mention of Local TV/Channel 7 in the consultation document. I would argue that a reallocation of the Local TV/7 licences is timely, reverting to the original vision of a unique local content offer that adds value to the current broadcasting ecology and justifies the gifted prominence and other resources allocated to these channels.

One of my recommendations to the UK in my Impact Media report is that we should envision and make happen a network of creative impact media hubs across our cities, towns and villages, linked to impact media outlets, where communities can come together to create content, engage with media and each other, debate, have a voice, learn new skills, develop their own media initiatives, and much more. Our dying high streets and disempowered communities could be revitalised, creating vibrant community hubs, engaged storytellers and a new layer of media social entrepreneurs.