Question	Your response
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?	Yes, this is key as audiences 'snack' across different platforms and are increasingly taking a media neutral (i.e. even more fragmented than being 'service neutral') approach to consumption. We see this particularly in the media consumption habits and preferences of young people. Getting this right will not only ensure content is compelling, accessible, visible, and sustaining for all audiences but will help to ensure suitability for future audiences. Our premise follows the same logic as accessibility, diversity, transparency, and inclusion imperatives. In particular, Public Service Media (PSM) across the Western democracies are facing the challenge of reduced citizen engagement with high quality media produced for the public good, due to proliferating competition from other sources, and difficulties in renewing their offerings while maintaining their public service mission[1, 2]. PSM are notably experiencing difficulties attracting and engaging with adolescent and young adult audiences[3, 4]. There are 3.95 million 10-14 year olds plus 3.66 million 15-19 year olds in the UK[5] : a total of 7.61 million young people. Loss of the young adult audience is "arguably the biggest challenge of all facing PSM organizations around the world, namely a generation of young audiences increasingly using social media platforms as their 'daily media' and turning away from PSM services"[6]. Adolescents' media habits differ substantially from those of older audiences or Millennials, the generation preceding so called Gen Z[7, 8]. Despite individual differences, certain media behaviours seem to overlap in this age group: Gen Zs are 'pivotals' who share some behaviours and attitudes with Millennials, but are also developing their own generational characteristic attitudes, aptitudes, aspirations, and anxieties[9]. Gen Zs are conspicuously eager adopters of digital communication practices. Their world is saturated by streaming and social media, making this cohort a thoroughly 'POPC' generation[10] (permanently online and permanently connected). Practically

[1] Lowe, G. F., & Maijanen, P. (2019). Making sense of the public service mission in media: youth audiences, competition, and strategic management. *Journal of Media Business Studies*, 16(1), 1-18.

[2] Taras, D., & Waddell, C. (2020). *The End of the CBC?*. University of Toronto Press.

[3] Wilson, M., and Fowler, N. (2020). *The Generation Game: Can the BBC win over today's young audience?* London: Bite-Sized Books.

[4] Jigsaw Research/Ofcom (2020). An exploration of people's relationship with PSB, with a particular focus on the views of young people. July. https://www.ofcom.org.uk/__data/assets/pdf_file/0024/199104/exploration-of-peoples-relationship-with-psb.pdf

[5] https://www.statista.com/statistics/281174/uk-population-by-age/

[6] InnoPSM (2020). PSM and Young People. Workshop report, February. https://innopsm.net/2020/04/03/workshop-2-report/

[7] Livingstone, S., & Sefton-Green, J. (2016). *The class: Living and learning in the digital age* (Vol. 1). NYU Press.

[8] Buckingham, D. (2019). *The media education manifesto*. John Wiley & Sons.

[9] Fromm, J., & Read, A. (2018). *Marketing to Gen Z: The rules for reaching this vast--and very different--generation of influencers.* Amacom.

[10] Vorderer, P., Hefner, D., Reinecke, L., & Klimmt, C. (Eds.). (2017). *Permanently online, permanently connected: Living and communicating in a POPC world.* Routledge.

all younger Gen Zs are online almost constantly or several times a day[11], generally via smartphones[2]. Members of Gen Z have extensive experience with interactive media: 82% of teens have used social media, and 72% have played computer games.Teens spend on average nearly ten hours per day using media and communication devices, of which over seven hours are devoted to screen media. Most of these hours are spent watching TV or videos, listening to music, gaming, and using social media. Smaller amounts of time are spent browsing, reading, or video-chatting.

According to a recent report on young people's media use from the European Broadcasting Union, *EBU Youth: What Works (European Broadcasting Union, 2020)*[12] Gen Z value 'realness'; authenticity. They are creative; skilled in photography, videography, editing, music production, and so on. They strive to make a difference in the world and strongly support diversity and inclusion. They have a good sense of social justice and fairness. They are flexible, ambitious, and have far greater access to education and knowledge than any previous generation. Young people trust their peers more than institutions. Gen Z are also health conscious and far more open to veganism, meditation, wellbeing than Millennials. They are green, global, and social online. This makes this age group a highly significant audience for PSM. However, apart from the German youth media channel 'Funk'[13] on Youtube, most PSM's globally find this audience challenging to attract and retain. Why is this?

Our preliminary work over the last two years (2019-date) strongly indicates that young people are platform neutral and screen neutral. They are excited by 'Algorithmic Media' that is media driven by algorithms. Previous research by Jackson and Glowacki of ten PSMs and ten high technology clusters across North America and Europe (2015-2019) found that PSMs are not internally or externally set up to produce algorithmic and other forms of advanced participatory media; they are not datafied, don't have the same partnership, collaboration, or co-working arrangements as high technology clusters[14]. The BBC is therefore not yet universally able to take advantage of advanced technological formats such as Interoperative Mastering Format, unlike Netflix. IMF is a recombinatory file format that enables media and associated elements (language-specific commentary, re-sizing, re-imaging and so on) for different playout conditions[15]. Newer combinatory formats and production standards, such as Virtual Production that combines datafied film with gaming technologies e.g. the Unreal Gaming Engine) have completely adopted and are dependent on fully-datafied systems and processes having been adopted[16].   To support these technologies, the operational, organisational, managerial, technological, and also economic arrangements have to fully adapt. The BBC is more advanced towards this than any other PSM, but progress is still too slow. However, the common good principle of PSM needs to be translated in an algorithmic and service neutral approach, as we are convinced it is imperative for a global citizenship. Innovative ideas like "open public spaces" – networks of platforms for the common good - should be considered.

[11] Pew Research Center (2020). What we know about Gen Z so far.
https://www.pewresearch.org/topics/generation-z/

[12] https://www.ebu.ch/publications/strategic/membersonly/report/youth-report-what-works

[13] https://www.funk.net/

[14] https://www.creativemediaclusters.com/findings

[15] https://www.avid.com/resource-center/what-is-the-interoperable-master-format

[16]https://www.cartoonbrew.com/vfx/a-virtual-production-explainer-what-it-is-and-what-it-could-mean-for-your-project-166554.html

Alongside a service neutral approach, therefore, the internal organisational culture has to change; this is imperative. To this end, Jackson and Glowacki advised PSM adopt a more entrepreneurial culture and accelerator programmes. They also recommended that support structures should be found for PSM-SME collaborations as SMEs (small to medium-sized enterprises) are where most innovation lies. The findings also evidence a high resistance to change and an 'Ivory Tower' mentality within PSMs across Europe and North America. To foster innovation, the BBC also needs to collaborate with scholars who particularly aim at PSM innovations. To this end the **International Association of Public Media Researchers**[17] has just been formed with the aim of aggregating research from both academia and industry on the PSM project. IAPMR incorporated in December, 2020. It is financially supported by the European Broadcasting Union whose members are keen to have an aggregation of ongoing research through a digital portal.

The **Youth Media and Culture Network**, an international network of scholars and public service media outlets, has been set up to specifically investigate the media engagement of young audiences. This is the direct result of a conversation with the BBC regarding how challenging it is to reach young people. The BBC were particularly noticing 14-16 year olds (the micro-segment of the population known as 'young Generation Z'), exhibit significantly unique media consumption behaviours. The group has applied for funding with various educational institutions and their Public Service Media counterparts: partners London South Bank University and BBC R&D, Ryerson University, Toronto and the Canadian Broadcasting Corporation, and TH Köln, Germany and Zweites Deutsches Fernsehen. All three PSMs have the same issue with young Gen Z, but sometimes lack the manpower to address their concerns internally. Academic collaborations represent a significant opportunity for investigation and innovation.

We don't have the space here to go into this exhaustively but would like the opportunity to explore this further with OFCOM and the BBC. We have links with the proposed new **BBC Centre for Public Values, Technology and Society:** a consortium of 11 organisations that has applied for funding from the Arts and Humanities Research Council. The funding proposal is through to the extended application stage with excellent reviews from the stage one application. The YM&C Network has also applied to the Canadian Social Sciences and Humanities Research Council and will be applying to the Arts and Humanities Research Council to fund both a research project on how to engage young audiences and to support the network itself. We are in the process of affiliating to the **Childrens' Media Foundation**[18].

The YM&C Network has hosted three 'Dialogues' on PSM and young people's media engagement online with the third after the submission date of this OFCOM Consultation. We therefore invite you to view the recordings of the first two talks[19], and also invite you to join our third Dialogues@YM&CN on 'Co-Concepting with Young People and Public Service Media'[20].

Question 2: Do you agree with our proposals for a	No, we don't believe young audiences ("Generation Z") have been sufficiently consulted or involved. To reach these young people requires direct engagement. There have been instances of involvement between young people and PSMs but these often took the form of involvement in the

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[17] https://publicmediaresearchers.org/

[18] https://www.thechildrensmediafoundation.org/

[19] https://www.youthmediaculture.com/resources

[20] https://www.eventbrite.co.uk/myevent?eid=139661048957

clear accountability framework?	production of legacy media. This is a suitable approach for schools or educational involvement but has often substantially failed for older teens, and particularly the 12-16 year olds. We recommend further research in this area, and would like the opportunity to be involved in this, working with the BBC and other PSMs, perhaps sourced via the European Broadcasting Union. A comparative series of interventions would provide robust solutions. In short we recommend that a clear accountability framework to involve young people should be *designed with young people* and this would not only benefit their audience segment but *all audiences.* ● An ongoing open feedback mechanism, with internal BBC effort to support that. ● A rolling mixed socio-economic youth council that changes membership annually or bi-annually to include the diversity of society. ● A co-concepting framework to involve young people in the co-design of platforms, services, and experiences. ● A focus on Positive Media Psychology and Eudaimonic Media (media in the public good) that truly engages and excites young people. See the work of: Art Raney[21], Karen Shackleford[22], and Mariek Vanden Abeele[23].
Question 3: What do you think should be included in the PSM 'offer'?	For young people, according to experts in Eudaimonic Media/Positive Media Psychology and our own research to date, authenticity is key in young peoples' media. The 'Blue Peter' approach of using young adult presenters to 'get down with' young people doesn't work with 12-16 year olds, and also, obviously older young people. The scholars in our network argue that young people are reached through their own storyworlds. Storytelling is the way forward as we "default to the social and we think in the story". They also want to have their media in their own multi-platform, transmedia, datafied, media universe. According to Volker Grassmuck, the German PSM-youth channel Funk works because it's multi-platform, multi-branded, and – as far as possible – involves young people. At the same time, the indispensable core common-good values of PSM sustain for future audiences. To reach young people requires a distributed approach[24] with content and engagement opportunities offered by and supported by PSMs *where young people naturally go.* Crucially, PSMs must not approach the audience from a top-down perspective but really understand the platforms from the perspective of the young people who are using them.This includes TikTok, Instagram, Snapchat, Twitch and others. There are thematic areas of particular potential such as eSports[25] and live-streamed comedy, which have both been pushing the boundaries of the platforms used to consume them. BBCiii is partly going back on to television[26], however our view is that both the BBC, OFCOM, and others should not think in terms of channels or platforms but of pan-platform/pan-service worlds built around ideas young people find interesting, and around global challenges they wish to solve. Young people have a strong interest in technology, but they expect the technology to work effectively and seamlessly in the background and across every screen as they multitask, read, snack on short -form content, binge-

[21] https://directory.cci.fsu.edu/arthur-raney/

[22] https://drkarendill.wordpress.com/

[23] https://www.tilburguniversity.edu/staff/m-m-p-vandenabeele

[24] https://www.vgrass.de/

[25] https://acesuk.org/

[26] https://www.bbc.co.uk/aboutthebbc/reports/consultation/bbc-three-channel-public-interest-test-consultation

	watch, and interact with others[27]. Young teen audiences value social diversity, family, tolerance, humour, compassion, and authenticity. And not to mix-up playfulness with apolitical behaviour: young people are also engaged in truly political debates such as the climate crisis and antiracism. They have learned to be cautious about what to share on social media, and are careful about trusting would-be influencers, while expecting to be treated by service providers as individuals, not as masses or numbers. Often, they want to make a difference, and for this they desire active participation and co-creation with trusted 'brands'. There is an opportunity to bring principles from positive psychology into a collaborative design process in such a way as to yield media content that is eudaimonic, i.e. conducive to well being.

Research and some areas of media practice demonstrate that media can have positive effects that go beyond hedonic pleasure to include elicitation of eudaimonic (well-being) -enhancing attributes such as meaningfulness, purpose, moral elevation, gratitude, admiration, inclusiveness, compassion, courage, and resilience[28, 29, 30]. Scholarship on eudaimonic media and positive media psychology could be brought to bear on innovation addressing younger audiences. In particular, there is a need for more media stories and narratives that speak to the issues and challenges of personal character development and citizenship facing young teens[31].

Much of the research literature on media impacts on young people focuses on the negative effects of media. The contemporary focus is on anxiety and depression arising from problematic use of social media, and in previous years the focus was on the detrimental effects of popular music, films, radio, or printed fiction. However, there is no doubt that some existing media content has eudaimonic effects. Public service media, by designing media for young people with intended eudaimonic effects, will stimulate development of character strengths such as compassion, courage, gratitude, integrity, and perseverance[32].

Eudaimonic media is not new to the BBC; the David Attenborough series The Blue Planet, and Attenborough's other offerings are exactly that. Dr Who is another BBC media 'universe' that is an engaging storyworld for all ages. The BBC has been creating such Eudaimonic storyworlds in the public good since The Archers radio series weaved advice on agricultural innovation and the need for understanding of the importance of agriculture after the Second World War. EastEnders also weaves in sex education, child safety and so on into its plot lines. |
| **Question 4: What options do you think we should consider on the terms of PSM availability?** | Overall, young people should be involved in indicating what they want to engage in, how, and the topics and challenges they want to address (see the EBU's review[33] of youth media services that PSM and others are already providing). Too often the debate focuses around TV channel time or radio minutes allocated. Young people's media (soon to be all our media) points |

[27] Fromm, J., & Read, A. (2018). *Marketing to Gen Z: The rules for reaching this vast--and very different--generation of influencers.* Amacom.

[28] Vanden Abeele, M. M. (2020). Digital Wellbeing as a Dynamic Construct. *Communication Theory*.

[29] de Leeuw, R. N., & Buijzen, M. (2016). Introducing positive media psychology to the field of children, adolescents, and media. *Journal of Children and Media*, 10(1), 39-46.

[30] Reinecke, L., & Oliver, M. B. (Eds.). (2016). *The Routledge handbook of media use and well-being: International perspectives on theory and research on positive media effects*. Routledge.

[31] Dill-Shackleford, K. E., & Vinney, C. (2020). *Finding Truth in Fiction: What Fan Culture Gets Right-- and Why it's Good to Get Lost in a Story*. Oxford University Press.

[32] Raney, A. A., Janicke-Bowles, S. H., Oliver, M. B., & Dale, K. R. (2020). *Introduction to Positive Media Psychology*. Routledge.

[33] https://knowledgehub.ebu.ch/young-audiences/youth-report-what-works

	the way forward, and channel-dependent thinking will ultimately fail in this new media ecology.

"Creative workshops" can be a useful tool to find out how young people engage with the media and media platforms[34, 35, 36]. Activities can take many forms from concepting and even co-concepting to co-designing where the creative participants work alongside professionals and the joint results are analysed.

PSM experiences with co-creation are relatively recent, and some scholarly assessments of the results express scepticism that the effort is worth the cost[37]. However, a recent workshop on young people and PSM held by InnoPSM, the Research Network on Innovation in Public Service Media Policies, emphasized the need for better research and practice on ways of involving young people in PSM content innovation, concluding that two key research issues and policy needs are "to create more nuanced understandings of 'micro generations' within the broad category 'young people' and "to explore participatory research practices for deeper understanding of young people's contexts and to facilitate co-creation"[38]. |
| **Question 5: What are the options for future funding of PSM and are there lessons we can learn from other countries' approaches?** | The BBC should also explore the potential of the Blockchain and of Public Value Tokens. Public Media Token use could be used as a measure of the public good or the growth of actions that might result in a public good as ONE potential measure of the return on investment. This would work for any algorithmic media.

Another option could be a Public Service Algorithm to segment content that's in the public good and to suggest content alongside more commercial offerings that promotes actions in the public good. |
| **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?** | Please see the two-page summary of the findings from a three year international study by Glowacki and Jackson[39] mentioned earlier which gives the evidence on this question. For your ease, we summarise below:

The loss of young audiences is a common (but not universal) issue to Public Service Media (PSM), undermining their positions as national broadcasters providing universal access and value to citizens and nations. Conversely, fully datafied international media are gaining audiences due to their ability to reach audiences when, where, and how they want. Fully datafied media within well-functioning media ecologies including high technologies and the wider creative industries are more able to pivot in response to changes in market and audience behaviours. |

[34] Jackson, LH, Gauntlett, D and Steemers, J (2014). *Children in Virtual Worlds Adventure Rock Users and Producers Study.* London University of Westminster, Communication and Media Research Institute.

[35] Jackson, L. and Pereira, L (2015). Testing Participatory Design and Responsive User-Interfaces to Teach Digital Skills to NEETs: Using an Experimental Online Learning Platform. *Media Education Research Journal.* 6 (1), pp. 37-62.

[36] Jackson, L., and Glowacki, M. (2019). Watching People: Observations, chapter 12 in *The Palgrave Handbook of Methods for Media Policy Research*. Palgrave Macmillan.

[37] Vanhaeght, A. S., & Donders, K. (2015). Interaction, Co-creation and Participation in PSM Literature, Policy and Strategy: A Comparative Case Study Analysis of Flanders, the Netherlands, France and the UK. *Media Studies*, 6(12).

[38] InnoPSM (2020). PSM and Young People. Workshop report, February. https://innopsm.net/2020/04/03/workshop-2-report/

[39] https://www.creativemediaclusters.com/findings

Professor Lizzie Jackson, LSBU and Dr Michal Glowacki, University of Warsaw undertook the first in-depth international study of the internal organisational cultures of ten high technology clusters and their co-working spaces in North America and Europe. Public Service Media in the Digital Mediascapes: People, Values and Processes' (2015-2019) funded by the Polish Science Fund (2015-2019) identified values, practices and knowledge exchange strategies to support collaboration between PSM and these media ecologies. Research was conducted in these cities with businesses and also with 1-2 of the local PSM: Austin & NPR Station KUT; Boston/Cambridge & Public Radio Exchange; Detroit & Detroit Public Radio WDET with Detroit Public TV; Toronto & CBC, London & BBC; Brussels & Vlaamse Radio and VRT; Vienna & ORF; Copenhagen & Danmarks Radio; Tallinn & ERR; Warsaw & Polskie Radio; PR & Telewizja Polska and TVP. Research data were collected via semi-structured interviews (150+), observational city 'Walkabouts', visual analysis of 500+ photographs, and examination of 'grey literature' (company reports, city strategies, and news reports).

Findings show that despite many high tech firms sharing compatible values with PSM - supporting the circular economy, health and wellness, or combating climate change - entrenched organisational structure, governance and culture hampers collaboration and adaption:

Entrepreneurialism vs. Islands of Innovation: Firms in high technology clusters are entrepreneurial, tolerating risk. PSM have lower entrepreneurialism typified by isolated individuals in small R&D departments and few incubation or acceleration programmes.

Agility vs. Rigidity: High technology firms have fluid organisational structures supporting continuous change. Trust relationships across the ecology are developed through training, networking, and events. PSM is departmentalised. 'Referral upwards' decision-making counters change.

Pro-Social Workspaces: High technology firms and clusters support knowledge exchange and relationship building in cafés, project spaces, communication booths, roof gardens, 'chill-out' spaces and discussion corners. Several PSM have adapted their offices to provide pro-social spaces, however they don't have the support frameworks to start up and scale collaborative projects.

Communities of Practice vs. Contractual Frameworks: The Community Manager is the most critical employee in collaborative ecologies sustaining the communities of practice. Projects can be progressed virtually using collaborative online platforms such as Slack. When projects hit problems face-to-face meetings temporarily resume. In contrast PSM largely commission suppliers through Commissioning Editors; bypassing more collaborative processes.

Technology-oriented Neighbourhoods vs. Corporate Headquarters: High technology clusters are almost exclusively found in inner-city regeneration areas supported by City Halls. The great majority of PSM are located in cultural or civic districts, indicating long-standing strategic orientations.

To summarise, the existing commissioning model, commissioning content from external providers is simple, crude, and not in line with the collaboration and partnership models found in high technology clusters. Hence, innovation is much more rapid in high tech clusters, even taking into account failed ventures, which are not framed as failures but merely part of the innovation journey.

| Question 7: What are your views on the opportunities for new providers of PSM? | In the light of these findings our recommendations therefore are that OFCOM, with the BBC and the other UK PSM providers develop:

- Joint research and innovation frameworks such as the **BBC Centre for Public Values, Technology and Society**
- A legal framework, augmenting the Lambert Agreement[40], suitable for PSMs to work collaboratively with SMEs.
- An arrangement to jointly support the Intellectual Property between the BBC and SMEs. This is wholly in line with the BBC acting as an accelerator of creative use of technology as a public good.
- An Accelerator programme over 12 weeks to support innovation in processes and practices in data systems, the development of new organisational systems, partnership framework development, and new entrepreneurship Innovation frameworks which support either in-house or external start-up ventures producing Eudaimonic Media; Media in the Public Good, co-concepting with young people. |

Please complete this form in full and return to smallscreen.bigdebate@ofcom.org.uk.

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[40] https://www.gov.uk/guidance/university-and-business-collaboration-agreements-lambert-toolkit