



March 22nd 2007

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IBT SUBMISSION TO OFCOM ON THE PROPOSAL FOR A PUBLIC SERVICE PUBLISHER

1 Introduction

- 1.1 IBT welcomes the concept of the PSP in its ambition to appeal to a broad range of audiences and strengthen the delivery of PSC in the digital age.
- 1.2 However there is an omission of any reference to international content within the PSP's creative remit which IBT believes needs to be addressed in order for the PSP to fulfil its obligations as a vehicle to aid the delivery of PSC.
- 1.3 IBT welcomes the fact that the PSP will commission content which is participatory and interactive. We believe this will encourage active citizenship in the digital age. However, we also believe that the internet, as an inherently global medium, offers the perfect opportunity for active **global** citizenship and for UK citizens to engage with citizens in other countries on the issues which affect them. This key element needs to be addressed and developed further.
- 1.4 IBT believes that, as we move towards the digital era, there is likely to be a deficit in content which exposes the British public to the wider world. In a now 'globalised' world, we therefore recommend that Ofcom should reconsider its proposal for the Public Service Publisher, incorporating into its role and content an obligation to encourage material which both covers matters of international significance and also provides alternative perspectives of international issues which affect the UK.

2 Background: IBT

- 2.1 The International Broadcasting Trust (IBT) is an amalgamation of two sister organisations: the former Third World and Environment Broadcasting Project (3WE) and former International Broadcasting Trust (IBT). The new IBT is an educational charity which seeks to promote high quality television and new media coverage of matters of international significance. In the past, 3WE has been active in this area and this submission fully reflects 3WE's long history of campaigning on these issues and arguing that international coverage on television is a necessary tool in informing us all, as global citizens.

- 2.2 IBT represents a coalition of international charities campaigning for high quality television coverage of ‘matters of international significance or interest’. Its members include: ActionAid, Amnesty International, British Red Cross, CAFOD, Care UK, Christian Aid, Comic Relief, Concern UK, Friends of the Earth, Merlin, Oxfam, Plan UK, Practical Action, Progressio, RSPB, Save the Children, Sightsavers International, Skillshare International, Tearfund, UNA UK, UNICEF UK, VSO, the World Association for Christian Communication and World Vision. IBT is a registered charity, number 326150.
- 2.3 The views in this submission reflect the concerns of IBT’s member agencies regarding adequate common understanding of the world in which we live. These concerns are shared by millions of UK supporters of our organisations. IBT’s members, being intimately and operationally concerned with the effects of ‘globalisation’ on communities and environments around the world, and with communicating across the world, welcome the advent of the global information society (GIS).
- 2.4 3WE has contributed to every major broadcasting policy consultation since the Government first began regulating converged communications in 1997. 3WE was instrumental in persuading the government to amend the Communications Bill so that a requirement for public service television to cover ‘matters of international significance or interest’ was included in the final Act [Section 264(6)(f)].

3 ISSUE 1: Appropriate nature of intervention in the digital media age and the balance between tv and non-tv forms of public service content distribution.

- 3.1 IBT agrees that public service content continues to deliver economic and social benefits that would not be realised without intervention and this applies to the wider digital media as well. IBT welcomes a mixed approach to supporting Public Service delivery in the digital age – both support of linear television (and genres which are under threat) and support for new material on other platforms.
- 3.2 However, IBT urges that there should be a wider public discussion about the Public Service Publisher and where its priorities should lie. We believe that Ofcom’s proposal needs to be subjected to full democratic debate, scrutiny and consultation.

4 ISSUE 2: The potential role of the PSP and its creative remit

- 4.1 IBT believes that international content is at the heart of public service broadcasting and by making no mention of this in the PSP proposal, that Ofcom is, in effect, failing in its role ‘*to further the interest of citizens... [by] ensuring a wide range of TV and radio services of high quality and wide appeal and maintaining plurality in the provision of broadcasting*’¹

¹ Ofcom’s Statutory Duties and and Regulatory Principles – www.ofcom.org.uk/about/sdrp/

4.2 PSB as defined by the Communications Act

The Communications Act 2003 contains two public service obligations with regard to international programming:

- That there should be comprehensive coverage of news and current affairs stories from the UK 'and around the world';
- That there should be Tier 3 (non-news) general programmes about 'matters of international significance.

4.2.1 IBT (formerly 3WE) was instrumental in persuading the government of the case for both of these obligations. That case rests upon the increasing indivisibility of national and international events and processes which affect the lives of UK citizens, and therefore which require the availability of 'information and education' through the most-used medium, public service television. We believe this case applies equally to digital media.

4.3 PSB as defined in Ofcom's PSB Review

In the Ofcom PSB Review the purposes and characteristics of PSB are explicitly stated to be:

- Inform ourselves and others and to increase our understanding of the world
- Reflect and strengthen our cultural identity
- Stimulate our interest in and knowledge of art, science, history and other topics
- Make us aware of different cultures and alternative viewpoints

4.4 International content in the PSP Proposal

4.4.1 In the PSP proposal Ofcom states that that the *core public purposes should 'endure'*. IBT agrees that *'If the PSP is established as a response to an enduring PSB argument, it should address the particular shortfalls that can be expected in the PSB arena of the fully digital age'*.²

4.4.2 On the basis of the obligations laid out in the 2003 Communications Act and the Ofcom PSB Review it is clear that Public Service Broadcasting (in this context Public Service Content) should 'make us aware of different cultures and alternative viewpoints', it should include 'Tier 3 general programmes about matters of international significance' and it should 'increase our understanding of the world'.

4.4.3 However, in the Ofcom PSP proposal there is an omission of **ANY** reference to content which 'increases our understanding of the world', assuming the 'world' to

² paragraph 1.27 - Ofcom PSP proposal

encompass not only the UK but also the world outside the UK, nor does the proposal refer to any content which makes us aware of 'different cultures and alternative viewpoints' outside the UK, nor does it include any reference to 'matters of international significance'.³

4.4.4 The Nature of New Media Platforms

Ofcom states that the PSP will '*meet public purposes using the tools, technology, insights and culture of digital media, both in production and distribution.*'⁴ The internet, as an inherently global medium, offers the perfect opportunity for active global citizenship and for UK citizens to engage with citizens in other countries on the issues which affect them. By not including any reference to international content or connection, the proposal for a PSP is ignoring a public purpose which would be easily served by new digital technology.

4.4.5 Diversity of Viewpoints

Andrew Chitty suggests: '*The PSP should encourage the emergence of new, strong and distinctive authorial voices that reflect the contemporary UK as well as incorporating diversity of views both within individual projects or services and across the entire output. Participative experiences require new forms of collaborative authorship that will foster the diversity of views that is felt to be disappearing from Public Service Broadcasting.*' If the PSP is to reflect the core public purposes as outlined in the Ofcom PSB Review, IBT questions why there is no inclusion of the 'wider world' in this statement.

4.4.6 Furthermore Ofcom states of the PSP that '*at its heart, the content would be participative in nature*' and offer a '*diversity of viewpoints*'.⁵ IBT argues that these viewpoints should include those from outside the UK in order to be truly, globally diverse.

4.4.7 Other PSB Content

IBT welcomes the current Ofcom reviews of news provision and children's programming – two key areas of PSB which are currently under threat – and recommends that the findings of these reviews are taken into account when revising the proposal for the PSP.

4.4.8 Search Mechanisms

As media proliferates users will be swamped by choice and be able to access whatever material they want, whenever they want it. While provision of choice is beneficial, we concur with Ofcom's fear that material will be difficult to find.⁶

³ The only two references to content outside the UK are both on the accompanying Openmedia Network website (www.openmedianetwork.org.uk) which aims to expand on some of the ideas in the proposal. *Cape Farewell* is cited as an example of good current practice and it focuses on the issue of climate change. *A Force More Powerful*, which costs \$39.99 (tbc), uses gaming to examine conflict resolution. Other than these two examples, all other examples of potential ideas and current sites available are firmly UK-focussed. These are incidental to the body of the proposal.

⁴ Paragraph 1.23 – Ofcom PSP proposal

⁵ paragraph 1.24 Ofcom PSP proposal

⁶ Ofcom PSP Proposal paragraph 3.32: Searching for and finding the results of these new opportunities is, however, likely to become ever more difficult... this poses a threat to public service content – if audiences are unable to reach this content it will not have the level of impact that it needs.)

4.4.9 Another likely result of the proliferation of media content will be that self-selection may lead to a narrowing of experience. Swamped by choice, users will simply select what they already know and cocoon themselves in their existing preferences, rather than be surprised by something which they didn't expect. We suggest that measures need to be taken to signpost material.

4.4.10 Therefore IBT agrees with the point made by Anthony Lilley: *"A further key role for the PSP would be in ensuring that search mechanisms for its content - and conceivably for all public service media content - become as efficient as possible. This would never extend to the development of a search engine, but it would involve working with search engine specialists and the major global and local players in search to establish tagging and discovery mechanisms to facilitate this. The PSP's "facilitation brand" could be a valuable way of finding and benchmarking this kind of content in future; a role which is already in dire need of filling."*

4.4.11 Conclusion

In line with Ofcom's predictions of declining PSC, IBT believes that there is likely to be a deficit in content which exposes the British public to the wider world. In a now 'globalised' world, we therefore recommend that Ofcom should reconsider its proposal for the Public Service Publisher, incorporating into its role and content an obligation to encourage material which both covers matters of international significance and also provides alternative perspectives of international issues which affect the UK.

5 ISSUE 3: The operating model – in particular the approach to rights management

5.1 IBT welcomes the recommendation that a new organisation should be established – not top down but bottom up commissioning. IBT agrees that a new organisation would provide a new source of innovation and would be able to place new forms of public service delivery at the heart of its mission. We agree that it should have its centre of gravity in digital media.

5.2 IBT agrees that the PSP:

- Should be a commissioner
- Should be "share aware" in terms of rights
- Should be based on a non-commercial business model
- Should work to secure greater impact by partnering with existing organisations in distribution.
- Should be based outside London.

5.3 We believe the PSP will be more effective in commissioning content which is different from that of public service broadcasters if a new organisation is established, rather than the role of the PSP being given to an established broadcaster like Channel 4 or the BBC. We also believe that a new organisation

is likely to be more effective as a bottom up commissioner, whereas established broadcasters tend to operate as top down commissioners.

6. ISSUE 4: The scale of funding required

- 6.1 IBT would like to see the PSP adequately funded so that it can make an impact. IBT accepts that it will be useful for the PSP to work in partnership with others and to use this to leverage additional funding. Equally, it needs to have sufficient funding to commission some major high impact projects, not just many small scale projects/content.