



CITIZENS' PSM FORUM BRIEFING NOTE MEDIA BILL November 17 2023

The Citizens' PSM Forum comprises British civil society organisations which believe that high quality media, and Public Service Broadcasting specifically, make a valuable contribution to UK democracy, society, culture and the welfare of its citizens. More information about the membership of the Forum can be found [here](#).

The PSM Forum meets regularly to discuss broadcasting policy. All the members welcome the introduction of the Media Bill to Parliament but we have concerns. This briefing provides an overview of these concerns.

1. The PSB Remit

While we welcome the inclusion of a new clause in the Bill to require a 'range of appropriate genres' from the Public Service Broadcasters, we still believe their status and the continued provision of PSM would benefit from a more specific definition.

We recommend that:

- I. In addition to the provisions already in the Bill the PSB remit should include objectives for providing education, entertainment, arts and UK cultural content, science, matters of international significance, religion and specialist interests as recommended by the Culture, Media and Sport Committee. These services should maintain high general standards with respect to the quality of programming-making and the professional skill and editorial integrity applied in the making of the programmes.***
- II. New PSB objectives for media literacy and workforce diversity should be introduced.***
- III. Ofcom's powers to hold PSBs to account for making insufficient contributions to the public service remit should be strengthened, as recommended by the Culture, Media and Sport Committee.***

2. Discoverability of PSB content.

We hold that all PSB content should remain universally available and easily discoverable.

We recommend that greater clarification is required on the face of the Bill regarding audiovisual content being 'made available' and 'easily discoverable' so that PSB content

cannot be ‘buried’ on online VOD platforms. We also recommend that the PSBs and platforms should be required to disclose the algorithms they employ to promote PSB content to Ofcom. This would increase transparency around prominence to ensure better PSB accountability.

3. Strengthen impartiality regulation

We are concerned that Ofcom, rather than Parliament, has the power to decide which content should be duly impartial. Ofcom’s existing Broadcasting Code is confusing and has led to current controversies over impartiality regulation.

We recommend that it should be defined in legislation which output, both on live TV and on-demand platforms, should be regulated for due impartiality and accuracy, rather than leaving these judgements to Ofcom’s discretion.

4. Channel 4’s founding mission as an innovative, risk-taking publisher-broadcaster

We welcome the increase in Channel 4’s independent production quota to 35% but we believe that Channel 4’s founding mission to support new and emerging independent producers should be reiterated and reinforced in the Media Bill.

We recommend the introduction of a new ‘SME Guarantee’ in Channel 4’s commissioning quotas, requiring that a significant proportion of its commissioning spend goes to producers with annual turnovers under £25m.

5. Radio provision

While digital platforms are growing in popularity, we want to see continuing regulatory support for audiences who continue to listen to content on FM and AM platforms. We also want to see better protections for community radio and small-independent providers, serving minority audiences, in Part 6 of the Bill, to ensure that audiences will continue to be able to access these in future.

We recommend that the changes in the Bill meaning Ofcom will no longer be required to ensure a diversity of national analogue stations or a range and diversity of local analogue services should be reconsidered.

Signatories

Better Media	https://bettermedia.uk/
Decentered Media	https://decentered.co.uk/
The British Broadcasting Challenge	https://britishbroadcastingchallenge.com/
The Campaign for the Arts	https://www.campaignforthearts.org/
The Children’s Media Foundation	https://www.thechildrensmediafoundation.org/
The International Broadcasting Trust	https://www.ibt.org.uk/
Into Film	https://www.intofilm.org/
The Media Reform Coalition	https://www.mediareform.org.uk/
The National Council of Women	https://ncwgb.org/
The Sandford St Martin Trust	https://sandfordawards.org.uk/
The UK Coalition for Cultural Diversity	https://ukccd.org/
The Voice of the Listener & Viewer	https://www.vlv.org.uk/

For further information please contact: Sophie Chalk – sophie.chalk@btinternet.com or 07973 408 243