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A CAMRI POLICY BRIEF
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In the face of challenges posed by a shifting digital media landscape, international bodies – from UNESCO and the 47-member Council of Europe to the Pan-African Parliament and an array of non-governmental organisations – continue to endorse public service media (PSM) as an essential component of democracy and democratisation. They see PSM values of universality, diversity and independence as more relevant than ever now that giant social media companies are facilitating unmoderated and non-transparent influence on public debates. Viability for PSM may seem unachievable in settings where models of media independence and credibility are unfamiliar or rejected by political leaders. But there are more ways of working towards this aim than are often recognised.

> Research evidence suggests that incremental approaches to embedding the values and modus operandi of public service media can achieve success.
The diversity of these potential incremental approaches deserves more serious attention than they currently receive in policy debates.

PSM viability can be furthered by actions taken in different parts of an interlocking system of licensing, professional representation, capacity-building and advocacy.

Since the need for public subsidy for public interest media is increasingly acknowledged internationally, it can be emphasised locally where awareness of alternatives to market models is limited.

If dominant social media actors are to defend and promote PSM values of pluralism and diversity, this calls for an independent, accountable and transparent multi-stakeholder mechanism for moderating social media content on the basis of international human rights standards.

Audiences have a vital, but too often neglected, role to play in PSM initiatives; ultimately they judge their credibility and thus determine their viability and long-term sustainability.
There is widespread consensus among institutions and individuals across much of the globe about the benefits of public service media (PSM) – the online and offline media provided by what have traditionally been called public service broadcasters (PSBs). Around the world the market’s failure to provide conditions for independent media to survive has hindered democratic politics, economic choices and development.

In contrast, the public funding that gives PSM operational autonomy and the regulatory framework that protects their editorial independence underpin the PSM mission to serve the public interest. They do this by fostering free public debate and ensuring fair coverage and representation of political pluralism and socio-economic diversity. The Council of Europe, representing 47 countries, testified that the PSM mission remains entirely relevant in today’s digital media landscape when in 2018 it recommended that ‘States should guarantee adequate conditions for public service media to continue to play this role in the multimedia landscape, including by providing them with appropriate support for innovation and the development of digital strategies and new services.’
Yet there is a perennial problem of embedding and sustaining PSM in environments where the relevant funding and regulatory models are unfamiliar or are rejected by those in power. Confidence that alternatives to market models can be established in such settings is often low, especially where financial resources are limited, or political stability is fragile. It is hard to argue that past attempts to support reform of state broadcasters in such situations have been uniformly worthwhile.

‘Is it futile to try to promote PSM in challenging environments?’

Is it therefore futile to try to promote PSM in challenging environments? This Policy Brief considers research evidence that suggests it need not be pointless, since there are alternative, incremental approaches that have achieved success. Success in this context may not mean transformative change but simply recognition that media are part of an institutional and socio-political fabric that can be affected by small steps. The viability of PSM depends not on individual media entities but on an entire ecosystem encompassing bodies involved in media regulation and licensing, or representation of journalists and media practitioners, along with laws underpinning civil society advocacy on behalf of media users.

‘The viability of PSM depends not on individual media entities but on an entire ecosystem’

As the complexity of this ecosystem suggests, PSM models can never be imposed from outside. The initiatives discussed here may involve some transnational or cross-cultural cooperation.
Yet essentially they depend on local players and stakeholders engaging in one or more of a range of regulatory or editorial practices that they can develop organically, from the grass roots up. That leaves open the possibility of countries in different continents using various reference points and terminology in pursuit of the same public interest function that anglophone sources dub PSM.

In parts of sub-Saharan Africa, for example, the concept of *ubuntu* embraces the fact that human beings are connected and can only thrive as individuals through the growth and progress of others. *Ubuntu* offers a meaningful rationale for policies that benefit the community. The social science approach to African self-understanding that has come to be known as *Afrokology* can also serve in redefining the public interest principle in PSM, so that all can find it relevant and deserving of popular support.

‘In places … critical distinctions between public, state and government have become blurred’

Eurocentric discourse, emanating from ideas about individual rights and citizenship negotiated over centuries, has not always been best placed to promote the perceived desirability of PSM in Arab countries. Here notions couched in terms of ‘publicness’ and ‘public service’ have limited currency. In places with decades-long histories of government media monopolies, critical distinctions between public, state and government have become blurred in relation to media ownership.

Instead, private media and social media networks are often seen as holding the key to publics having a chance to communicate
in ways that are denied to them by state-run media. Should such media feature in the push for PSM? In Morocco, private radio stations have attracted millions of listeners across the country by using colloquial languages and producing shows that intentionally engage with listeners’ social and economic grievances. In Zimbabwe, in contrast, the presence of six national radio stations, ten local radio stations and ten internet radio stations transmitting from outside the country did little in 2019 to serve democratic debate. Most such stations were producing content aligned to vested political and economic interests.

‘Audiences are self-evidently vital to any PSM-related initiative’

Audiences are self-evidently vital to any PSM-related initiative; they judge its credibility and thus determine its viability and long-term sustainability. In traditional PSM settings – such as those in northern Europe – audiences own public service media through their financial contributions, mandating governments to arrange collection of specific fees or levies. Elsewhere, audiences may be paying compulsory licence fees without having any stake in running the service funded from the money they pay.

If, in consequence, media users rely heavily on big social media corporations for information and entertainment, where do these fit into landscapes that pose challenges for PSM? Are they part of the problem or part of the solution? The analysis that follows notes levels of market dominance that allow some platforms to influence public debates and considers ways to address their role as one element in a holistic approach towards achieving viability for PSM in challenging environments.
This Policy Brief summarises evidence presented by the authors at a CAMRI Policy Observatory Event on 18 June 2019, under the title ‘Securing Core Elements of Public Service Media in African, Arab and European countries’. The event considered:

> support for public interest media in Africa and Asia

> how social media could assume elements of public service responsibility

> openings that could increase support for PSM in Jordan, Morocco, Tunisia and Lebanon

> a lack of qualitative audience research as a shortcoming of public media provision

> policy challenges faced by public broadcasters in Zimbabwe and southern Africa.

Incidentally, the event demonstrated the value of PSM by showing how public service broadcasters in northern Europe had outperformed private operators in responding to the information needs
of young children affected by sudden population movements resulting from forced migration.²

Discussion at the event revealed a consensus that securing PSM calls for a holistic approach.

A Typology of Project-Based Approaches

James Deane, director of Policy and Research at BBC Media Action, suggested that there may be more options available for supporting subsidised public interest media systems than is often recognised. Based on BBC Media Action experience, he presented a typology of six project-based approaches to supporting public interest media systems. These were not to be seen as a comprehensive inventory but as an initial framework to illustrate these approaches’ diversity, success and impact and as an invitation to more creative ways of approaching the issue. His typology focused on project-based examples and not on systems-based approaches to the process of subsidising PSM.

> The Transformational Approach: In rare moments of democratic transformation, it may happen that the state broadcaster and the state are sufficiently determined to bring about change that they provide the resources and sustained political commitment to establish a PSM system. Examples include transformation of the Tanzanian Broadcasting Company in 2009–10 and the ongoing development of Télévision Tunisienne (TTV). The Tanzanian project was successful in the short term but, as with similar transformations elsewhere, faltered with the breakdown of the democratic reform process itself.³
> **The Incremental Approach:** Where expectations are low that the reform process will lead to transformational change, efforts may be justified by societal and democratic benefits offered by small-scale changes. Myanmar TV, previously focused entirely on government announcements and government news, accepted support for newsroom changes that led to a gradual, limited shift to news more attuned to public expectations. It introduced a new current affairs radio programme run by an all-female production team and a popular radio drama focused on improving social cohesion and tolerance.⁴

> **Start-Ups At Scale and Over Time:** This approach recognises that efforts to reform the state broadcaster are unlikely to be worthwhile or, in countries with poor security, achievable. Instead, it focuses on supporting the foundation of new institutions or platforms. Examples include Al Mirbad, started in 2005, which is one of the longest running initiatives supported by BBC Media Action and perhaps the most trusted media institution in Iraq, with a strong broadcast and online reach and a strong relationship with its audience.

Opportunities for such initiatives are increasing and recent efforts have taken the form of digital first/digital only platforms. These have benefited from high levels of internet penetration even in places where power supplies can be unreliable. An example is El Kul (For Everyone) in Libya. This is a Facebook platform for news and public debate operated by Libyan staff from Tunisia and
has more than 500,000 subscribers – a significant reach, relative to Libya’s population of 6.8 million, of whom nearly 4.3 million were Facebook users in 2018. These initiatives assume increasing levels of cost recovery but also – since a sustainable business model is not available – calculate that the public benefits of their existence justify sustained assistance over time.

> Supporting Universality: Some countries have an existing public service broadcaster that is functioning in terms of funding, reasonable degrees of editorial independence and due impartiality, but is not fulfilling a key PSM characteristic, namely engaging all in society. The approach here is exemplified by past work to support efforts by Estonian and Latvian PSBs to better serve these countries’ large Russian-speaking populations.

> Co-Production Approach: Co-producing programmes is an effective way to build skills and capacity, especially those involving public debate styled on the BBC’s Question Time, in which public figures face questions from studio audiences in a different location each week. Co-production in this case provides a role model for what PSM looks or sounds like for audiences, for governments and for the media institution itself. It often leads to competing copycat shows from other broadcasters when they realise such programming can be popular. The BBC name is used only when partners agree to BBC editorial standards of independence and impartiality, but these partners may be state or commercial broadcasters. Examples include BBC Sajha Sawal (Common
Questions) in Nepal, *Open Jirga* in Afghanistan, *Sanglap* (Dialogue) in Bangladesh or *Sema Kenya* (Kenya Speaks). Typically they attract up to around one in four of the adult population and have facilitated a more deliberative framework for debate.

> **Networked Approach:** Support can be provided for networks of community or commercial media entities committed to working in the public interest. Support includes capacity building, business advice and content sharing, as has happened in Zambia, Tanzania and Nepal.

**Initiatives in Other Institutions**

Media reform initiatives in recent decades have often been framed in terms of whether they take place in an ‘enabling environment’. This refers to a country’s political and judicial institutions and how far they support freedom of expression and information and, more widely, the full range of activities undertaken in the public interest that complement media output such as fair regulation and licensing, monitoring of content, handling complaints and collective representation of media practitioners. Drawing on checklists contained in the UNESCO Media Development Indicators template, Naomi Sakr drew attention to openings that have occurred in regulatory bodies and journalism unions in a small number of southern and eastern Mediterranean states.

> **Audiovisual Media Regulators.** The regulatory bodies of Jordan, Lebanon, Morocco and Tunisia are the only Arab members of the Mediterranean Network of
Regulatory Authorities (MNRA). Since the MNRA also includes the authorities of countries with functioning PSM systems and requires its members to be independent, membership carries commitments but also provides moral support. Morocco’s HACA, whose powers to ensure diversity and pluralism in broadcasting were extended by the parliament in 2016, was entrusted with vice-presidency of the MNRA in 2018 (although its hosting of the MNRA Plenary Assembly in Rabat in December 2019 was adjourned). HAICA of Tunisia and the CSA of Lebanon have had peer-to-peer exchanges with European regulators and other stakeholders.

Jordan’s Media Commission has licensed the country’s first local 24-hour news channel, Al-Mamlaka. Launched in July 2018 as a state-funded public service operation, the service is intended to be independent and to create a ‘close bond with Jordanian citizens by providing a forum for all voices to be heard’.

> Journalism Unions. The long-running saga of journalists’ representation in Tunisia illustrates the potential for journalism unions to exert positive influence on the media climate. The Syndicat national des journalistes tunisiens (SNJT) replaced a government-controlled body as the result of journalists’ own votes in 2008, before the revolution in 2010–11. Since then it has been credited with holding firm against government attempts to co-opt media outlets.
Audiences for PSM are key to their viability, and ways for PSM to reach audiences are today a challenging policy issue as users turn to social media platforms as their (main) source of news. This applies especially to young media users whose future media habits are still being formed, with much of their present media use currently on-demand and personalised.

Two reports in 2019 from the Reuters Institute for the Study of Journalism closely analysed young people’s news consumption. One, researched in eight European countries, showed that, in six of them, the proportion of respondents aged 18–24 years getting news from Facebook and YouTube was greater than that getting news from the online service of the countries’ PSM provider/s. Exceptions were the UK and Finland, although in the latter case Facebook was a news source for more under-25s than YLE online, and YLE online outperformed YouTube by just one percentage point.

The second report, however, showed that media users aged 18–34 still valued traditional news brands, although ‘almost always in a digital format’. It concluded that members of this age group want ‘news access to be easy, and entertaining – but they also want it to be authentic, fair, and meaningful’ and they ‘certainly don’t want it to be dumbed down’.

Research suggests that responses to this situation, that seems to be replicated across many more countries, lie in innovative policies towards tech giants such as Facebook and YouTube’s owner,
Google, along with better understanding of young audiences and closer alignment with audiences in general.

> **Moderation of Online Content Distributed by Tech Giants.** Pierre François Docquir, referring to ARTICLE 19 research on policy towards social media platforms, noted that current practices of content moderation on social media offer very little in terms of transparency and virtually no remedy to individual users. Online content distribution’s impact on the public sphere is not yet fully understood. Yet the platforms in question operate at such a level of market dominance that they can exert decisive influence on public debates. The business model of giant tech companies rests upon their capacity, through the analysis of individual preferences, to ensure that users make themselves available for advertisers on the platform. How then can they assume elements of public service responsibility, such as defending and promoting pluralism and ensuring fair coverage of political parties during elections?

Taking account of Facebook’s own decision in 2019 to create a forty-member Oversight Board to adjudicate content issues, ARTICLE 19 has looked at existing modes of content regulation and moderation. Where platforms regulate speech by virtue of their contract with users, they find this has failed to provide adequate transparency or protection of rights. Co-regulation, involving state support for privately-run self-regulation, has also been found wanting in terms of ensuring freedom of expression. Instead, based on a two-day meeting
in February 2019 with stakeholders, including Facebook, YouTube and Twitter, ARTICLE 19 has proposed the creation of an independent, accountable and transparent multi-stakeholder mechanism that can provide a forum to approach content moderation on the basis of international human rights standards.\textsuperscript{13}

\textbf{Qualitative Audience Research.} Tarik Sabry quoted statistics from regional surveys showing that audiences in Arab countries rely on private media for discussion of public issues, thereby forging what he called ‘do-it-yourself publicness’. He said the evolving picture is one of a quasi-competitive media landscape that is strategically exploited by authoritarian regimes, but to perceive the picture only in these terms overlooks audiences’ ability to resist, subvert and speak to power.

Use of social media, notably Facebook in North African countries or Twitter in Saudi Arabia, has widened the scope of protest cultures. Yet little is understood about how everyday cultural practices of ordinary people tap into, or amplify, public media characteristics of privately-owned media. In the absence of qualitative audience research – let alone ethnographic research with media users – media practitioners, media regulators, media academics and civil society groups across the Arab region all make assumptions about what audiences think or want without any scientific evidence.\textsuperscript{14}

\textbf{Targeting Relevance and Trust.} PSM is usually defined via the key attributes of: universality (meaning that the
The entire population has full access to the service; diversity (in the genres of programme offered, audiences targeted and subjects discussed); independence (through protection from political and commercial pressures); and distinctiveness (through a remit to innovate and set high standards). The second and third of these translate into relevance and trust. Winston Mano’s current research advocates new pathways for impactful PSB policy reform in southern Africa using coalitions of civil society groups. He pointed out that if public service media are financed by the public, they must be controlled by the public and not only designed for the public but also with them.

Mano’s research includes evidence gathered during and since the multi-stakeholder December 2013 conference in Midrand, South Africa, seat of the Pan-African Parliament. This event led to the ‘Midrand Call to Action on Media Freedom and Public Broadcasting in Africa’. Mano’s research shows that independent and accountable broadcasters operating in the public interest are still a pipe dream in most of Africa. It shows there is a need to unpack the public service concept using Africanist thinking so that all media users in African countries can find it relevant.
The term ‘challenging settings’ contained in the title of this Policy Brief indicates the existence of several dilemmas inherent in discussing policy options and recommendations. The first is that power holders who benefit from undemocratic media systems are, by definition, unlikely to welcome policies designed to give greater voice to the public and enhance democratic debate. The second dilemma is that PSM models cannot be imposed from outside, as became apparent through attempts in the Balkans in the 1990s and again in Iraq after the 2003 US-led invasion.

The ‘options’ identified below are those that risk being adopted in efforts at internal reform in the wake of a significant change of political leadership, such as took place in Ethiopia and Malaysia in 2018, or alternatively through external support provided to media under the heading of ‘development cooperation.’

Putting PSM at the Centre

The word ‘transition’ has often appeared in discussion of media reform policies, usually in reference to optimistic expectations of democratisation in hitherto non-democratic countries. In what are routinely, but often erroneously, described as ‘transitional’ circumstances, such expectations may include a focus on the
state broadcaster and moves to transform it from government mouthpiece to a public service media provider. Previous studies have concluded that results from such transformation efforts are mixed, not least because they need to take place in the context of ‘meaningful’ political and economic reforms that underpin ‘surrounding institutions’ and can preserve the PSM provider’s independence.\textsuperscript{21} Yet, even when it is recognised that PSM embodies a set of principles that should apply not only to ‘national broadcasters or state corporations’ but to ‘various legislative and regulatory frameworks’,\textsuperscript{22} there is still a tendency to present a media-centric analysis in which the starting point for policy approaches is the media landscape itself. A consensus appears to be emerging in the media development sector that seeking to reform state broadcasters is fading as a policy option – not least because social media activity renders contemporary media landscapes highly complex and enhances the reach of new public interest media on various platforms. That consensus needs to extend to recognising the pitfalls of media-centrist policies and the important relational structures that link the media with the economy, culture, society and politics.

\textbf{Sidelining the PSM Model}

Another policy option is to respond to the ubiquitous changes in media landscapes and media consumption by questioning whether PSM functions are worth supporting as a priority over other elements of media development. Even in countries with a long history of public service broadcasting, it has become commonplace to question whether public subsidies are still warranted for services that face growing competition from subscription video-on-demand (SVOD) providers such as Netflix and Amazon
and video-sharing platforms like YouTube, and which demonstrably struggle to keep up with the demands of diverse societies and the media habits of younger generations.

The argument is heard that PSM is either redundant or should be relegated to meeting only those demands for information or entertainment that are not met by the market. Indeed, a UK parliamentary committee in 2009 suggested that certain programmes and services merit public finance and special regulatory treatment and others do not. In 2019, however, after several years in which the rise of global commercial players put ever-increasing pressure on public service broadcasters in terms of the cost and supply of talent and in terms of audience share, a comprehensively-researched inquiry by the UK House of Lords Communications Committee, (for which Steven Barnett of the University of Westminster was appointed as specialist advisor) determined that public service broadcasting remained ‘as vital as ever’. That conclusion, echoing the Council of Europe endorsement quoted at the start of this Policy Brief, buttresses the Policy Recommendations set out below.
A holistic approach, as understood in this Policy Brief, refers to a set of policies that recognise not only the central importance of PSM to the health of media systems and politics but also the importance of a whole range of institutions other than media outlets in achieving viability for PSM.

**Deploy Keys Within the System as a Whole**

> Keys to achieving viability for PSM exist within complex political and social systems; these extend beyond media to encompass a range of supporting functions. **Policy should be devised with the existence of these keys in mind.**

> That means being aware of, reinforcing or promoting **various types of opening**, for example in entities that deal with regulation and licensing; in organisations that represent the interests of journalists and other media practitioners; and in civil society bodies advocating on behalf of media users as well as media producers.
> **PSM viability depends on audience attitudes.** Policies aimed at achieving viability should include qualitative audience research.

> **The principles of PSM, or media in the public interest, need to be unpacked** as part of public consultations informed by local concepts and experience. As such, media initiatives should be designed *with* the public, not just for them and their relevance needs to be readily apparent to potential users.

**Consider Social Media as Part of the System**

Use of social media has widened the scope of protest cultures. Yet little is understood about how everyday cultural practices of ordinary people tap into, or amplify, public media characteristics of privately-owned media. Under certain circumstances, social media can be part of a push for PSM.

> **Any PSM initiative should have the availability of relevant PSM content on social media** at its core because the way younger audiences use social media will be decisive in the way they view initiatives in favour of PSM.

> **Collective learning is needed regarding how to place public service responsibilities on social media giants.** ARTICLE 19 has proposed a multi-stakeholder forum to resolve problems of content moderation that affect social media platforms’ influence on public debates.
1 Council of Europe, Recommendation CM/Rec(2018)1 of the Committee of Ministers to member States on media pluralism and transparency of media ownership, at https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=0900001680790e13

2 For more on those PSM responses, which are beyond the scope of this Policy Brief, see Naomi Sakr and Jeanette Steemers, *Screen Media for Arab and European Children: Policy and Production Encounters in the Multiplatform Era*. Basingstoke: Palgrave Macmillan, 2019, especially Chapter 5.

3 See Phil Harding, *Public Service Media in Divided Societies: Relic or Renaissance?* BBC Media Action Policy Briefing, October 2015, for a summary of the Tanzania experience and the role of PSM in divided societies.

4 See https://www.bbc.co.uk/mediaaction/where-we-work/asia/myanmar/tea-cup-diaries

5 See https://en.unesco.org/programme/ipdc/initiatives/mdis


13 See https://www.article19.org/social-media-councils


16 Naomi Sakr, Good Practice in EU Public Service Media and Contemporary Practice in Jordan (see details in Note 7), pp. 7–9.


In the face of challenges posed by a shifting digital media landscape, an array of international bodies continue to endorse public service media (PSM) as an essential component of democratisation. Yet how can PSM achieve viability in settings where models of media independence and credibility are unfamiliar or rejected by political leaders?

The answer lies in a holistic approach that is neither media-centric nor defeatist about PSM’s place in a landscape marked by younger generations’ widespread preference for social media platforms. There are more ways of working towards PSM than are often recognized. Wide-ranging research from media NGOs and academics demonstrates the potential of diverse, incremental approaches to embedding the values and mechanisms of PSM. These are as likely to involve regulatory and licensing institutions, unions of media practitioners, audiences, advocacy groups or social media platforms as content producers themselves.

This Policy Brief considers the issues, research and policy options around achieving viability for PSM. It concludes with six recommendations that are relevant to policymakers, practitioners and media studies specialists.

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