

CITIZENS' PSM FORUM
OFCOM PSM REVIEW RESPONSE
March 2025



The Citizens 'PSM Forum comprises civil society organisations which believe that high quality media, and Public Service Media specifically, make a valuable contribution to UK democracy, society, culture and the welfare of its citizens. We consider Public Service Media (PSM) to be a 'social value proposition', not simply a market commodity, because it supports the UK's democratic wellbeing, therefore it should be regulated differently from other commodities.

This paper proposes ideas and possible solutions to the three main questions on resolving the challenges facing PSM posed by Ofcom in the meeting with the Forum on the 6 March 2025, which were how to maintain:

1. **PSM content that connects with today's audiences**
2. **Sustainable provision of PSM**
3. **Access to trusted & accurate news.**

1. PSM content that connects with audiences

- a. **What is needed to ensure all audiences can access and discover PSM content, where they want to consume it?**

The Forum acknowledges that the current landscape is extremely challenging for PSBs with increasing competition from streaming services and social media and tech companies. Our position here is to ensure that the interests of UK citizens, who are the intended beneficiaries of public service media, are served in the review.

The Media Act and PSM Remit –

It should be noted that, though more detailed than the new PSB remit, the 2003 Act's move away from programming quotas for specific PSB genres enabled a major fall in production in those genres, particularly by the commercial PSBs.

Ofcom has said it will continue to measure delivery of the PSB genres set out in the 2003 Communications Act, which were not specified in the 2024 Media Act. Since they are vague, much now hangs on how Ofcom chooses to interpret the provisions of the Act that define the overall PSB remit – for example, the definition of what constitutes an "appropriate range of genres" – and on how robustly it enforces the remit.

Despite problems with the wording of the Media Act, Ofcom’s draft guidance to the broadcasters on how to demonstrate they are contributing to the overall PSB remit could go some way to providing the kind of clarity and specificity necessary to ensure the PSBs can be properly held to account for the adequacy of their individual contributions. It is therefore crucial that Ofcom’s final guidance is as clear and specific as possible.

To serve all audiences effectively, PSM content must span diverse genres, including arts, religious programming, children’s content, science, and international coverage reflecting a society with continually evolving demographics.

We are concerned that the PSM Review states that Ofcom concludes that UK audiences continue to have a greater choice of content although Ofcom’s own communications market report shows the dramatic reductions in UK PSB spend per genre (£m) from 2010 to 2023.

UK PSB genre spend

Change since 2010:	£ (m)	%
Arts & classical music	-£42	-60%
Children's	-£57	-38%
Comedy	-£85	-45%
Drama	-£222	-36%
Education	-£19	-68%
Entertainment	-£95	-18%
Factual entertainment	£51	27%
Feature films	-£232	-66%
General factual	-£27	-13%
News and current affairs	-£84	-19%
Religion & ethics	-£10	-50%
Soaps	-£105	-27%
Special factual	-£11	-5%
Sport	-£352	-40%

BBC, ITV and Channel 4 are all moving away from mid-range content to focus on commissioning fewer but bigger titles designed to drive audiences towards VoD.¹ This presents a risk to genre diversity.

In addition, Ofcom’s own research has shown that the PSBs provide far less news and current affairs content on their VoD services compared to their linear channels.² Research by the University of Leeds in November 2023 revealed that the most prominent parts of BBC iPlayer, ITVX and Channel 4’s VoD service were dominated by fiction, entertainment content (aping the genres typically provided by SVoD services). They also displayed a far more limited range of genres compared to the prime-time schedules in the same period.

Prominence of Public Service Remit content in PSB VoDs

We acknowledge that Ofcom is currently consulting on the designation of PSB IPS Services. We believe that it is imperative that public service remit content on PSB’s IPS be readily discoverable and promoted. Unlike linear schedules, Ofcom and other observers are unable to monitor how content is prioritised and promoted to audiences within personalised online environments.

¹ Johnson and Martin (2025) Adapting Public Service Media: How are the UK’s major public service media organisations responding to the age of platforms? University of Leeds, p.5. Available at: <https://psm-ap.com/uk-policy-brief-adapting-public-service-media/>

² Ofcom (2024) Review of Public Service Media (2019-23): Challenges and opportunities for Public Service Media, p.65.

It is impossible to know whether the values and principles of public service media are being adequately applied across IPS, and we believe broadcasters should be obliged to disclose their algorithm's operating principles and how it serves and prioritises different content – to Ofcom, in return for public service status.

We recognise that demanding greater transparency of the PSBs algorithms adds further obligations to the PSBs on top of the wider pressures they face in the media landscape, especially when there is relatively no transparency from either the streaming services or the tech platforms with whom they are competing.

All the PSBs should - at the very least - be required to provide Ofcom with an annual statement setting out the principles and values that underpin the development and deployment of algorithms.

In order to evaluate prominence, Ofcom should also require PSBs/device manufacturers to be more transparent about the definition of high-traffic areas on their VoD services/devices. Providing aggregated high-level data on clicks and impressions would improve accountability and trust and enable independent scrutiny of prominence legislation.

b. Are there specific remedies that would help audiences connect with PSM content on the services they use?

Retain a public service identity on PSM VoDs³

While moving to digital-first delivery is essential for the PSMs, they must develop unique content strategies to stand out from global streaming platforms and offer a diverse mix of genres during peak viewing times, rather than focusing mainly on drama, entertainment, and documentaries, as many streaming services do.

Optimise for diversity

PSMs should prioritise content diversity, variety and inclusivity on both on-demand (VoD) and traditional TV and combine human curation and algorithm-based recommendations to ensure a wide range of content is available and easy to find. When using algorithms, they should draw from the full catalog to meet the principles of PSM to serve all audiences.

Enhance the Public Value of PSM - we would like to see the PSBs demonstrate how they advance civic participation, social cohesion, community development, cultural identity and meet the public policy needs of different groups within society, at different levels of local, regional and national engagement. As part of this process, we are keen that a broader range of voices are brought into the PSM discussion to encourage pro-social practices.

We recommend that Ofcom require PSBs to conduct longitudinal, ongoing qualitative research on audience engagement and report on how they fulfil their public service obligations. Ofcom must lead this effort, as PSBs have resources unavailable to civil society and academics.

Although not simple, we believe this is essential to demonstrating the public value of PSM. The PSM system rests on the consent of the public – if they don't directly experience or recognise the benefits, they

³ We endorse the PSM policy mechanisms in the briefings compiled by Professor Catherine Johnson of Leeds University as part of the **Public Service Media in an Age of Platforms research** <https://psm-ap.com/publications/policy-briefs/>

cannot be expected to continue to support PSM interventions that protect a handful of otherwise randomly designated broadcasters.

c. Are there specific audience groups we should focus on?

Children and young people's programming should be easily accessible and mandated for regular presence on SVODs (Subscription Video on Demand) and VSPs (Video Sharing Platforms), as recommended by the Children's Media Foundation.

d. Where audiences have significant choice, how can PSM content connect with them?

PSM Delivery on BVOD platforms: While we understand that Ofcom is working on a methodology to measure the delivery of PSM content on the PSB VOD platforms, we are concerned that this could be impossible to achieve unless there is greater transparency from the PSBs. The PSBs are being trusted to deliver their obligations online without a responsibility to disclose the algorithms which drive the prominence of content on their VOD platforms and the principles upon which they have been designed. We are advocating that government require the PSBs to be transparent by disclosing the details of their algorithms and principles so that Ofcom can properly assess PSM delivery.

e. How can we support the commissioning of PSM content which reflects the whole of the UK?

Global streaming platforms and foreign-owned studios dominate production, distribution, and exhibition, with minimal content regulation.

If the UK is no longer subject to the AVMS directive and particularly Article 13, new legislation must be introduced to counterbalance this:

- 30% of streaming platforms' catalogues should be British content, clearly labelled.
- British content should receive due prominence (e.g. as Slovakia mandates for Slovakian content on Netflix).
- SVODs and VSPs with over £25 million revenue should be required to invest in British productions with fair rights retention.
- A 2-5% levy on streaming platforms should fund independent British drama, documentary, and children's programming.

(Examples can be provided if requested).

Introduce measures to protect and grow commissions for smaller, independent indies in nations & regions.

Smaller, regionally based, independent production companies should receive greater support, given that:

- Super-indies dominate PSB commissioning (accounting for nearly 50% of spending while comprising only 10% of the sector).
- Smaller companies (40% of the sector) receive only 10% of commissioning spend.
- We urge Ofcom to review PSBs' commissioning practices and consider regulations to support SME indies, as proposed with the Channel 4 'SME Guarantee' amendment to the Media Bill.

2. Sustainable provision of PSM

a. What can be done to support the financial sustainability of PSM content, including news?

Again, we acknowledge the challenge for the PSBs operating in the wider media landscape with competition from streaming services and social/tech companies. To sustain a level playing field regulation needs to ensure coherence between traditional and new players and to safeguard competitive practices through a rigorous regime of monitoring and enforcement.

The BBC is essential to the delivery of PSM in the UK. We advocate a sustainable level of funding for the BBC decided by an independent commission based on a clear definition of what the BBC is being asked to deliver, its support for creative diversity and the civic, social purposes it exists to fulfil.

We suggest Ofcom investigate the possibility of developing a system of ongoing investment and levy obligations to contribute to sustained investment in British drama/documentary, film and children's content from a range of suppliers including SMEs (as outlined above in point 1e) with appropriate levels of IP rights to be retained by British indie producers.

We advocate ensuring the criteria for any future tax credit would mandate that any production made with the fund would guarantee British citizens universal access to the content produced and should not be behind a paywall.

A news media code, similar to Australia's, should be introduced to ensure fair compensation for journalism.

b. What can be done to support monetisation of PSM content on third party platforms?

Regulation needs to address the distribution of PSM content on third-party platforms, especially as social media and video-sharing platforms become the first point of reference for younger audiences. We support the recommendations of the PSM-AP project that policymakers should explore interventions to facilitate the development of cooperative frameworks for distribution of PSM content on social media and VSPs.⁴ This should include:

- Agreed standards for audience measurement and data sharing designed with the public interest at heart
- Terms of trade, to ensure that the distribution of PSM content on social media and VSPs returned sufficient revenue to PSM organisations to support their financial sustainability and ensure the return of investments to the UK creative economy
- Changes to the measurement of PSM remits, to ensure that regulation captures the value of PSM content on social media and VSPs
- Mandated prominence of PSM content on social media and VSPs through mechanisms such as pinning or up-weighting of PSM content in platform algorithms.

Requiring PSBs to distribute content on social media and VSPs without the regulatory interventions listed above will have negative consequences for PSBs, UK society and the UK's creative economy:

- A greater percentage of revenue generated by PSBs (including the licence fee) will go to US platforms that do not return that revenue to the UK economy. As such, revenue that currently flows back into the UK economy would, instead, flow into the hands of large US corporations.

⁴ Johnson and Martin (2025) Adapting Public Service Media, p.5

- Ad revenues and audience reach will be dependent on the algorithms adopted by the platforms. These could change at any moment, leaving the visibility of PSM content and the sustainability of PSM at the whim of global platforms.
- Reduced revenues (and for the BBC reduction in payment of the licence fee if this is not required to access BBC content on social media) would further undermine the financial sustainability of PSM.
- PSBs would have reduced access to user data, while platforms would have access to increased user data. This could undermine the competitiveness of PSM as data about their programmes/audiences could be used by their competitors to inform content production and algorithms. Reduced access to data will make it harder for PSBs to measure and monitor the reach of their content and the fulfilment of their remits.
- When distributing on social media and VSPs, PSBs lack control over the environment within which their content appears, which could lead to a decline in attribution and trust.

Fair compensation policies are essential for PSM content on third-party platforms, ensuring equitable revenue sharing and copyright protection.

Policy coherence and calibration is essential between DCMS and DSIT so that the impact of digital and tech development on PSM, creator SMEs and individual artists is properly understood. This is exemplified in the government's ongoing profound disagreement with the creative community on which its industrial strategy in part depends.

c. When viewing content on other services, what is needed for audiences to attribute content to PSBs?

There needs to be a “discoverability” strategy for PSB creative works online to include legislation that mandates due prominence in headline of opening pages of streaming platforms as well as prominence in left hand sidebar as well as clear labelling and categorization of PSB content. Prominence legislation needs to be extended to social media and VSPs.

3. Access to trusted and accurate news.

a. What can be done to help audiences access and discover high-quality news, where they want to consume it?

We are concerned that as opinion-led journalism is increasingly normalised on UK channels this continues to undermine news standards in accuracy and impartiality. The underlying problem is that in a competitive broadcasting market there is a massive financial incentive in providing partial news which is more ‘entertaining’. Ofcom’s recent loss of the judicial review of GB News’ breach of the broadcasting code is extremely worrying. We welcome Ofcom’s agreement to review regulation given we have continuously stated concerns about its vagueness. The Forum would also suggest that it would be in the public interest for Parliament to decide which services be covered by the impartiality rules rather than Ofcom.

Policy interventions into PSM content on social media and VSPs (as outlined above) could significantly improve the prominence and visibility of the high-quality journalism produced by the UK PSBs and help audiences to access and discover high quality news.

b. How can the risk of exposure to mis- and disinformation be reduced and media literacy improved?

Adopting a more expansive and proactive definition of media literacy

We were encouraged to hear the PSM Review team talk about their own expansive views on media literacy, and hope they use the review to ask for government for a more comprehensive definition and measurable objective on the topic.

Our view is the definition of media literacy shouldn't be limited to just (no doubt valuable) education around dis- and mis-information. The term needs a greater civic perspective in relation to supporting audiences' media access, their media skills, and their knowledge of (and involvement in) media production.

At its core, media literacy should be about ensuring that all audiences are equipped to participate in the modern media landscape based on their own personal needs, interests and rights - rather than purely as consumers for data capture or passive readers with tools to discern 'right' from 'wrong'.

The Good Things Foundation states there are 8.5m people in the UK without the skills or resources to get online – PSBs can and should have a role here now government is encouraging them into a 'Digital First' approach following the Media Act.

We also encourage the PSM Review team to look at the new Digital Poverty Alliance research focused on how DTT is essential to continuing to help audiences access and discover high quality news - "traditional television news helps 65% verify the information they see on social media or online – acting as a factual baseline".

<https://digitalpovertyalliance.org/wp-content/uploads/2025/03/Safeguarding-Britains-Social-Resilience.pdf>

Ofcom's own research⁵ revealed that those who do not use TV news are less able to identify facts accurately related to current affairs, pointing to the importance of developing new interventions to ensure that audiences can easily and freely access and discover the high-quality news provided by PSBs.

For further information please contact: Pip Eldridge or 0779000 2471

⁵ Ofcom (2024) Review of Public Service Media (2019-23): Challenges and opportunities for Public Service Media.