

# Submission to Ofcom's Second Public Service Broadcasting Review

December 4th 2008



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## Introduction

1.openDemocracy, Pickled Politics, Liberal Conspiracy and Ekklesia are pleased to have the opportunity to contribute to Ofcom's Second Public Service Broadcasting Review - Phase 2 Consultation. openDemocracy, Pickled Politics, Liberal Conspiracy and Ekklesia are online publishers, sources of news, comment and analysis and forums for debate. These sites/organisations (as well as many others in this category) have innovated in successfully bringing new voices, new sources of information and extending and enhancing debate in the UK and overseas.

2.In providing high quality, original UK content we have added diversity, extended quality and helped to foster constructive competition in provision of online content. We are thus leading examples of a type of media that contributes to achieving the four purposes of public service broadcasting identified by Ofcom:

3. 1. increasing our understanding of the world through news and analysis
4. 2. stimulating knowledge and learning
5. 3. reflecting UK cultural identity
6. 4. making us aware of different cultures and alternative viewpoints

## Public Service

7.We are proud that we have contributed to these public service purposes which Ofcom is charged to nourish and foster and believe we as well as others like us are well placed to contribute in the future – particularly to “filling the gap” in public service provision to ethnic minority and youthful users who are under served by established broadcasters by doing this in ways that are deliberately open and cross-community, looking outwards not inwards. Moreover we are well placed to contribute to the fulfilment of Ofcom’s statutory duty to “further the interests of citizens in communications matters”. Citizenship is not a precisely defined concept and there is a less well developed body of reflection and practice in respect of the citizen and communications than for the consumer and communications. We believe that modern citizenship should embrace democracy as a means to be active and participate with intelligence, vigour and good judgement so that democratic values and social integration are developed in real life. Unlike the passive relationship between users and providers of “legacy” mass media (and broadcasting in particular) we, and organisations like us, exist through the participation of our “prosumers” (producers/consumers). We do not claim that any and all “Web 2.0” sites provide, of necessity, a forum where citizenship can grow - only that we offer an intrinsically different space to that of one-to-many-broadcasting where a democratic communicative citizenship can, if appropriately framed and developed, be practised and enacted.

## Constraints

8.However, despite the growth of news and comment internet sites/media (eg <http://www.indymedia.org.uk>, <http://www.opendemocracy.net>, <http://www.pickledpolitics.com>, <http://www.liberalconspiracy.org>, <http://www.ekklesia.co.uk/content/news/news.shtml>, <http://www.mysociety.org/>) and a host of blogs many sites have a mayfly life and survivors, including us, are often extremely fragile. Although the successes of websites such as our own testify to the opportunities to reinforce success (and prevent premature failure) and reinvigorate public debate and dialogue by providing public support for diversification of provision of worthwhile

content they require public funding to survive and thrive. Sites, such as ours and others listed above, depend on a variety of sources of funding in order both to enter the public sphere of debate and information distribution and exchange and to survive within it. Some depend on the modern equivalent of the aristocratic patron, some on dedicated enthusiasts, some on partisan activists and others on charitable and foundation support. But none have developed a viable business model – for there is none as yet. Neither advertising nor subscription finance has yet provided a robust and sustainable funding.

9.Ofcom's early kite flying notion of a Public Service Publisher opened an important debate on public funding but it focused on, and perhaps was captured by, established broadcasting interests. Accordingly we welcome Ofcom's inclusion of a refined competitive funding model in this Second Public Service Broadcasting Review - Phase 2 Consultation. However, we regret that we are sceptical about the viability of an industry levy providing sufficient funding to build a diverse, pluralistic and robust community of public service content providers. The rapid erosion of the viability of commercial PSB (ITV, Channel 4 and five) and the growing weakness of the newspaper sector suggests that the commercial content sector is unlikely to be able to sustain the range of high quality providers of public service content envisaged by Ofcom. Public finance will, almost certainly, be required. We note with interest recent developments in the Netherlands where (as a recent TNO study for the Stimuleringsfonds voor de Pers showed) Dutch public service Internet content providers had received public support of c 2.5m euros (between 2003-2007) which had been disbursed to 26 recipient sites/organisations. We do not invoke, in an unqualified way, the Dutch precedent as a model for the UK but cite it as an example of the recognition in a neighbouring democratic state of the importance of extending public support for public service content beyond the recipient broadcaster incumbents.

### **Plurality**

10.We also note, and concur with, the House of Lords' Select Committee on Communications' comment (in para 389) its recent report on The Ownership of News, that: "Public Service Broadcasting cannot be left to the BBC alone" and that plurality in the public service provision of news and current affairs is of crucial importance. The Lords' Committee also commented interestingly on impartiality. We agree both with the Committee's testimony to the importance of impartiality and agree that the "weakening of the impartiality requirements as they apply to UK broadcasters would have a negative impact in the quality and trustworthiness of the country's news" (para 400). But the Committee also acknowledged that impartiality requirements might be selectively applied, in proportion to the size of the UK audience of the services in question (para 401). We believe that this selective approach is a good one – it opens the door to new entrants, whose competitive advantage (for they cannot afford initially to compete on the same terms, in "me too" fashion against established well funded news sources such as the BBC) will lie in their distinctive engagement with news and information and their engagement with "prosumers". We note too that opinionated blogging is a regular feature of BBC news services.

11.We do not claim to be "impartial" but we do strive to be truthful, sometimes authoritative and certainly to be open. The quality of "openness" is different from "balance". The latter implies a consistent expenditure to prove all views according to some measure of their externally existing importance with the provider pretending to have no view of its own. Whereas "openness" permits holding certain basic values, for example support for democracy, human rights, racial equality, while taking these as a platform to launch committed, public spirited and truthful argument. These

necessarily have a point of view. But in an open publisher they are launched with a desire to engage with contrary arguments and encourage responses. Even though it is not closed or authoritarian, a democratic public is not neutral. The question of impartiality is important because the Communication Act 2003 gives it a particular status and one which, we believe, should be re-examined. openDemocracy and Channel 4, have sought to develop a partnership (under Channel 4's 4IP initiative) but have found this impossible to realise because of Channel 4's concerns in respect of the special impartiality requirements of the Act.

12. We have found that our engagement with “prosumers” supports our aspirations and commitments to be truthful, authoritative and open. Our news and information coverage and debate may be, if individual fragments are taken, thought partial. That is because they are based on dialogue and debate. We believe that this difference in method is itself a valuable contribution to pluralism. This is not to assert that we have nothing to learn or change. To the contrary – with more resources we hope to improve the authoritativeness of our content through more active and extensive editorial guidance and to better ensure that contributors conform to appropriate self-regulatory codes and principles. But to do this we need more resources than we currently enjoy – hence our claim on public funding.

### **openDemocracy**

13. openDemocracy was incorporated in 2000 and began online publishing in March 2001. It has built up an unparalleled reputation for intelligent and well-informed debate and for provision of authoritative news and information from a variety of sources – often those left at the margin by “legacy” media. Coverage of Kenya in January 2008, for example, has brought into the public sphere African writers like Peter Kimani and Roger Southall as well as unusual academic commentary from the anthropologist Angelique Augerud and the French expert Gerard Prunier. This coverage has been widely picked up and praised for its depth and originality in the African press and blogosphere. openDemocracy is well networked internationally and, for example, uses a large number of Pakistani writers when a Pakistani issue under consideration. Its commitment to dialogue and debate means that typically it commissions more than one piece on a particular subject. And openDemocracy prides itself on using “non metropolitan voices”, its former editor Isabel Hilton said, “we don’t publish on the basis of a metropolitan outlook”.

14. Testimonies to the OpenDemocracy’s achievement and quality include:

15. Michael Conroy, Rockefeller Brothers Fund

16. You have created new global dialogue on really tough and timely issues, and, frankly, the voices of your authors bring refreshing and courageous new perspectives to U.S. audiences, which not even the best of our progressive media have the courage to touch!

17. Hermes64:

18. I am a member of the Australian Parliament. I have to say that when your email comes in to my inbox, I get so engrossed that I can’t make my way to work.

19. BBC World Service, during the Orange Revolution in the Ukraine:

20. We’re having trouble getting onto your website. When will it be back up? How are we meant to know what to think and what is going on without it?

21. Andreas Whittam Smith, Founding Editor of The Independent:

22.OpenDemocracy has crossed the line from being interesting to being essential. There is always something I feel I must read.

23.Shaun Chau, UK Cabinet Office.

24.Just a little positive feedback about OpenD. I love it - it's great. I in particular like how you email me with stories because I often don't have time to check OpenD but the emails often pique my curiosity. I find this works particularly well when the stories relate to big news stories ie Kenya and Pakistan recently. Otherwise, hope you have a good new year - and I look forward to reading Open Democracy this year. Keep up the good work!

25.openDemocracy owes its existence to support from foundations, notably the Ford Foundation and Atlantic Philanthropies, raised on a plan for swift financial sustainability. In the last two years, it has enjoyed growing celebrity and reputation but has struggled as its initial financial model failed. Staffing has fallen to 4 full-timers supported by interns and contributions from associated projects. (Compare this to Salon (<http://salon.com>) which also has a magazine service and a staff of 50). Although openDemocracy secured over a thousand small donations from individual supporters in 2007, it remains in need of £150k pa to provide a growing global service, even then devoting relatively little to commissioning and paying for contributions.

### Ekklesia

26.Ekklesia (<http://ekklesia.co.uk/>) is an independent, not-for-profit think-tank and news briefing service which examines the role of religion in public life and advocates transformative ideas and solutions appropriate to a changing and plural environment. It was founded in 2002.

27.A widely-referenced source of authoritative comment, policy ideas and news input on a range of contemporary issues related to religion and politics, Ekklesia has been listed among the UK's top 20 think tanks by The Independent newspaper. It has been profiled and quoted extensively by the BBC, by national and international newspapers and by major news agencies such as PA and AP. It was recently described by The Times as 'influential'. Ekklesia now has one of the most widely read current affairs websites examining religion and society in Britain, according to Alexa/Amazon rankings.

28.The web is the hub of what Ekklesia does in providing a syndicated daily international and domestic news briefing service and e-bulletin; producing publications and papers on key policy questions; contributing distinctive opinion to print, broadcast and web media; sponsoring conferences, and providing consultancy and workshops combining practical and theoretical knowledge. Ekklesia also provides an online bookshop and other resources. It helped to initiate the Westminster Forum, through affiliates generates significant income for social justice causes, and runs a unique ISP focussing on reconciliation and conflict transformation.

29.Ekklesia is at present entirely self-supporting and receives no large-scale or corporate funding. Its total annual expenditure is around £40,000 annually. It is structured on a co-operative basis through a range of voluntary associates and partners. These include senior academics, faith leaders and commentators from secular and specialist backgrounds.

30.Ekklesia is a company limited by guarantee. It has two freelance staff and many consultants and contributors. Full details of our personnel, values, procedures, support, organisational links and operation are available here: <http://ekklesia.co.uk/content/about/about.shtml>

## Pickled Politics

31.Pickled Politics is a current affairs magazine / group blog. Our primary focus is always on British politics, current affairs, media and society. We are not a general culture and entertainment blog.

32.We have an Asian (meaning South Asia) tinge to our stories as some of us are of that background, but our politics are broad and progressive.

33.We frequently disagree with “community leaders”, race-relations experts or just politicians and commentators generally. If you disagree with us then post your opinion underneath the article, but do so constructively.

34.Pickled Politics is here to provide a new range of progressive voices that previously, we feel, were not being represented.

35.We want to influence and contribute towards change and building a more tolerant and pluralistic society. For that reason we are unafraid to criticise the establishment.

## Liberal Conspiracy

36.Liberal Conspiracy is a political magazine and discussion site in the form of a multi-author blog.

37.We aim to bring together and re-invigorate the liberal-left in Britain through discussion and campaigning.

38.Is Britain run by a vast liberal-left conspiracy? Conservatives are often determined to find such plots stretching from the media and government to public services and other organisations.

39.Yet the reality suggests otherwise. Not only is public debate in Britain often lacking in left-liberal energy, if there was a vast conspiracy then it is way too disorganised and dysfunctional. Most of us believe in freedom, transparency, human rights, democracy and the public good. But somehow that isn't what we usually end up with.

40.We don't want to define what being part of the liberal-left means because that limits us. We want you to tell us where the liberal-left should be going and why.

41.Liberal Conspiracy is a space for us to have an intelligent conversation about liberal-left ideas and values. We want to do this by involving commentators from newspapers and magazines, thinkers, analysts, academics and think-tanks, but also ordinary citizens (through blogging) who are too often shut out of this debate.

## Public Funding Need

42.As anyone can see, websites can fulfill a significant need for remarkably little financial support compared to traditional media. openDemocracy, Pickled Politics, Liberal Conspiracy and Ekklesia and other similar publications present a striking opportunity to deliver "bang for the buck". Our claims should not go by default because of the 'louder' claims of well connected "legacy" media and their well established lobbyists (whose efforts will in fact be paid for out of the public interest purse). The problems of "legacy" media are often testimonies to the opportunities enjoyed by new entrants and new media. But to capture such opportunities new media entrants can benefit from open-minded public support given in a spirit of encouraging experimentation.

43.

44. Accordingly, we welcome Ofcom's identification of a competitive funding regime as one of the options in its review and urge that it takes into account both the need to sustain fragile new entrants to the converged media market, who have benefited from the impact of new technologies in reducing entry barriers, but who both risk being overwhelmed by incumbent content providers moving online.

45. There is much room for debate on the amounts, conditions, terms and duration of public funding and about the criteria on which public support should be provided (and accepted). openDemocracy, Pickled Politics, Liberal Conspiracy and Ekklesia are ready to contribute to such debates. We feel that one of the criteria to qualify for such support is a capacity to start and sustain ourselves without public support and thus demonstrate that the self-belief, the editorial capacity to maintain quality and the initial demand exists to justify public funding support.

46. Briefly, we believe that funding should be provided to applicants which can demonstrate that they already can enhance diversity and pluralism, provide high standards of content, are non-profit distributing. Funding should be proportionate and sufficient to enable efficient providers to provide a consistent high standard of service including maintenance of an editorial function which fosters and extends the range of contributions, facilitates moderation, checks facts and ensures adherence to appropriate editorial codes. We would be happy to set out our views in more detail and look forward to participating in the further development of a refined competitive funding model for the provision of public service content throughout the UK.