

Ofcom Small Screen: Big Debate
Consultation on the Future of Public Service Broadcasting
Submission from Ofcom Advisory Committee for Northern Ireland

Ofcom's Advisory Committee for Northern Ireland (ACNI) advises Ofcom on the interests and views of citizens and consumers in NI in respect of communications matters. The Committee has been closely involved with the debate about the future of Public Service Broadcasting throughout 2020/21. It has received briefings from Ofcom and discussed emerging themes and evidence at its meetings. This is the Committee's submission to Ofcom's public consultation. It will have an ongoing interest in responses to the consultation and further proposals and developments to strengthen and maintain Public Service Broadcasting for the next decade and beyond.

A. Introduction

ACNI believes that Public Service Broadcasting (PSB) delivers substantial value to the UK and its audiences that would otherwise be lost, and that its purposes are as important as ever. We recognise that the system and its regulatory framework urgently need updating to secure its future in a rapidly changing media sector.

The committee agrees with Ofcom's view that a transformation to Public Service Media (PSM) is required, straddling online and broadcast TV. This can only be achieved if it is supported by stable funding, sufficient to its broad and ambitious remit. It also requires a fair balance of terms with the global online platforms to recognise the value of PSM content and to ensure it is easily found and duly attributed.

We agree with Ofcom's analysis of why PSB still matters – providing important content that non-PSBs do not deliver, reflecting the diversity of the whole of the UK, bringing people together in shared experiences, serving all audiences with a breadth of content, and underpinning the creative economy. All of these are important to audiences, and indeed wider society, in Northern Ireland (NI).

We consider that Ofcom's proposals are very focused on the factors which would enable PSM to make a successful transition to an online world. It is fundamental that PSB can translate to these new realities. However, we would add two important caveats:

Firstly, we believe that, in order to succeed, PSB needs to further develop its connection to and relevance for audiences in all their diversity, wherever they are around the UK. PSB, and in turn PSM, is founded on the principle of universality but for some sections of the audience - including but by no means limited to younger people - this connection is much less well established. Prominence and findability are essential, but are far from all that is required for PSM to flourish. We have considered this factor in relation to NI audiences and to social inclusion, but appreciate that it also relates more widely to diverse groups around the UK.

Secondly, the benefits of PSM must continue to be accessible to all sections of the audience, including those whose needs are, for various reasons, not all easily met online. The transition from broadcast to online delivery is not necessarily a straight road or indeed a given over time for everyone. As a universal service, PSM must continue to include sections

of the audience who find it difficult to access online services, and to do so in a way that does not exclude them from the full PSB/PSM offer. More widely, as the BBC Three experience has shown, consumption patterns have proven to be as complex as they are evolving, with enduring broadcast needs sitting alongside the take up of online services, even for younger audiences. This has significant implications for the consideration of 'service neutral' or 'online first' approaches.

The Committee has responded to Ofcom's specific consultation questions in some detail below. We have also considered what PSM would mean for audiences in NI to understand how it could best meet their needs, and what that might contribute to wider thinking about how it can develop and flourish.

B. PSB/PSM for Audiences in NI

ACNI has identified some of the key characteristics of PSB for audiences in NI that need to be fully considered and developed under a new PSM framework.

Serving the diverse culture and needs of audiences in NI: PSB's connection with audiences in NI is, in very large part, dependent on the extent to which it can fully reflect their lives and serve their distinct interests and needs.

NI is culturally, socially, demographically, politically and in many others ways very distinct from other parts of the UK. It is geographically separate and has the UK's only land border with another state and, now, with the EU. It has a unique history and political and social development that informs both the big themes and the minutiae of everyday life. We have, for example, different political parties and traditions and a unique power-sharing arrangement for government alongside North South and East West institutions; and there are major public policy differences across the range of devolved powers. We have distinct structures, such as a health service which is already integrated with social care. There is cultural and linguistic diversity lived and expressed through Irish and Ulster-Scots. Our schools system is specific to NI, with distinct curricula needs and priorities. We have diverse sporting interests where there is no single main sport but where the 'big match' might be Gaelic football rather than premiership soccer. And since Brexit we have seen greater economic divergence and regulatory change unique to this place.

There is also a huge diversity of life and experience within NI that informs audience needs and interests and can't be served by a single perspective from Belfast.

All of this is relevant to how we are informed, educated and entertained, to how we understand ourselves and how we are understood by audiences across the UK. Indeed, we even have a unique public service broadcasting ecology which includes PSBs based in the Republic of Ireland. Both RTE and the Irish language station TG4 have been made widely available to NI audiences on Freeview since 2010 under a Memorandum of Understanding (MOU) between the UK and Ireland governments, as an outworking of the Good Friday Agreement.

The requirement to serve audiences across the UK sits at the heart of the current PSB system. It is one of its immense strengths and underpins the continued relevance of PSB to audiences wherever they may live. For example, the capacity to report to and about the different Nations of the UK during the Covid-19 pandemic has been invaluable, right down to

the provision of briefings by the NI Executive, signed in both British and Irish Sign Language. Without this locally relevant reporting NI audiences would simply not have been adequately informed about the most major issues, including public health advice. Meanwhile the provision of educational content relevant to local curricula has delivered unique value to students in home school, just as it has for their counterparts in other parts of the UK.

ACNI would be concerned if any of this ability to serve audiences in NI was lost in the transition to PSM as its offer would simply become less relevant, however accessible. Indeed the Committee believes that there will need to be further focus on serving different audiences to ensure that in a PSM environment everyone can find something that is 'of them and for them', thus preserving the spirit and day to day reality of a universal service.

The Committee thinks that Ofcom's advice should consider both how diverse needs can be met in a new framework and how this framework should be developed to better connect with audiences around the UK.

Authentically portraying audiences around the UK: Audiences in NI want to see and hear themselves portrayed accurately and authentically through content that is aimed at both local and UK wide audiences. And they also want to see and hear about different ways of life and communities around the UK.

Whilst progress has been made in this regard, what is striking is how strongly this need continues to be felt by audiences in NI in all their diversity, and what a marked difference it makes to them when it is delivered, often driving up audience reach, appreciation and satisfaction with the service as a whole. Record NI viewing figures for Series 3 of ITV's *Marcella*, set in Belfast, for Channel 4's *Derry Girls* and BBC's *Bloodlands* bear this out.

It will be important that a new PSM framework is able to further develop the authentic portrayal of audiences across the UK, including NI.

Supporting the creative economy in NI: PSM will only achieve its aims if it supports the creative economy all around the UK. NI has a small and growing independent sector that has achieved UK-wide and international success with programmes such as *Line of Duty*, *Game of Thrones* and *Derry Girls*, bringing significant benefits in terms of the local economy, portrayal and the development of talent wherever it may be found.

The PSBs sit at the very heart of the local creative economy, underpinning its growth and sustainability. Quotas, and particularly the obligations placed on the BBC, have proven to be absolutely necessary to grow production levels from a very small base. A new framework will need to make use of these strong regulatory levers and encourage a meaningful and sustained commissioning presence in NI. We note that network spend by the PSBs collectively in NI is still only around 2% (around 50% below NI's share of the UK population).¹ We believe that there is every reason at this stage to set more stretching targets for production spend in NI by the PSBs and develop the conditions in which these can be delivered.

The Committee has been concerned that one of the impacts of the pandemic appears to be a drawing back of commissioning to the centre. It will be important to address this early on as the impacts could be enduring. And, whilst ACNI welcomes the movement of production

¹ Pact Census 2020 Nations and Regions Annex quoted in Ofcom Small Screen: Big Debate Consultation paper p12

and commissioners 'Out of London' it emphasises the important commitment to spread production around the UK and not just to new centres in GB.

The Committee welcomes Ofcom's call for evidence on the relationship between the PSBs and the production sector and asks the regulator to use this evidence to consider how well the system can deliver for NI as well as through designated hubs in GB.

Partnerships: PSBs in NI (and indeed the other devolved Nations) are very experienced in collaborating with partners within the industry and beyond to deliver public service objectives. Examples include BBC NI's partnership with Libraries NI and UTV's partnership with the Public Record Office of NI to digitise its archive and make it publicly available. Meanwhile the Irish Language and Ulster-Scots Broadcast Funds are excellent examples of successful contestable funding initiatives, bringing new and existing providers together to meet closely defined aims in efficient and creative ways. The BBC's successive partnerships with NI Screen are stand out examples of collaboration to achieve key public service outcomes. ACNI believes consideration should be given to how other PSBs could adapt this model.

ACNI underlines the importance of thinking about partnerships and collaborations from a UK-wide perspective, drawing on experience and expertise beyond the centre to deliver diverse and innovative projects that impact across the UK.

Plurality and a unique PSB ecology: NI audiences benefit from plurality of provision through a range of network and local providers, including (for TV) the BBC, UTV and local TV station NVTV as well as RTE and TG4. It will be important to preserve and develop this plurality in a new PSM framework. Particular consideration needs to be given to how this unique ecology transfers from a broadcast to an online environment, bearing in mind that, for reasons relating to the registration of IP addresses, NI audiences are mostly unable to access the RTE and TG4 players.

A wider societal view: We note that the SS: BD conversation and consultation has, to date, been very focused on the views of the audience and on industry perspectives. We believe it is vital to extend the debate to the array of organisations who can speak to the wider societal value of PSB and – most importantly – to what is needed at a strategic level to sustain and develop this. For example, in NI there are important perspectives from arts and culture, business, education, sport, the third sector and groups representing different audience and consumer interests and so on. All of these organisations, and the people they represent, have a vital stake in PSB and should be part of the national debate about what it means and how it should evolve.

Promoting the strengths of a system based around the UK: One of the strengths of the current PSB structure is that it is designed to reflect the needs and interests of audiences all around the UK, with more and more of its activity based outside London. There is a challenge in ensuring that this geographically distributed structure contributes to thinking not just on the new PSM offer but in all aspects of how a new framework is constructed, including structures, funding, technology, partnerships, accountability and so on. ACNI observes that at times of transition and scarce resources there can a greater pull towards the centre than is necessary - or intended - unless proactively checked. The Committee therefore asks Ofcom to strengthen its advice in this regard and consider how best this may be achieved.

The Committee has also considered its advice in respect of the specific consultation questions, as detailed below.

C. Committee Responses to Consultation Questions

1. Do you agree that a new regulatory framework for PSM delivery should support a more flexible 'service neutral' delivery approach that is more outcomes focussed.

ACNI agrees in principle that, to enable the transformation to a much-needed new PSM model, the regulatory framework should become increasingly service neutral and outcomes focussed, where this supports universality and the wider public service remit. This would allow the PSBs more flexibility to choose the provision and delivery best suited to the agreed aims, and be more responsive to ever evolving needs and opportunities. Such agility is essential when PSBs are having to meet the needs of both broadcast and online audiences, and the complex intersection of these.

It will be important to define outcomes in a way that is clear, measurable and will fully leverage *all* of the intended public service benefits, whilst also retaining flexibility with regard to how this is achieved. On a practical level, we note that measuring outcomes can be more difficult and open to interpretation than measuring outputs, and this may not always serve the policy aims as well. We note that the principle of universality implies substantial complexity in this regard because of the range of different audience needs that must be met. It is vital that no section of the audience loses out in the transition to a new framework. Particular regard needs to be paid to inclusion and diversity, to vulnerable groups and those who are less well connected to or served by PSB. As we have noted in our introduction, the transition from broadcast to online may not be a straight road or indeed a given over time for all audiences, including some older groups and some people with specific accessibility needs.

Audiences in NI (and other Nations and Regions and diverse communities) have a wide range of distinct interests and needs that are uniquely served through PSBs. At present these are significantly protected through requirements at service level, for example in specifying minimum hours of particular genres like NI TV news and current affairs, or setting quotas for network commissioning from outside London. These interventions have, on the whole, been successful and in many cases have proven to be necessary interventions to achieve the policy aims.

We also note that, whilst more audiences are moving to online platforms, significant sections still access their content primarily or exclusively through broadcast channels. Moreover, the BBC Three experience shows that there is still a service level proposition for young audiences who consume the majority of their content online. Whilst this is the case, we believe that there will still be some areas where it is necessary for the regulator to set requirements based on the scope and scale of provision, rather than outcomes alone.

A new framework must also ensure that the benefits of PSM are appropriately spread across different sections of the UK audience, wherever they live. ACNI is very mindful that, when

targets are not set at the level of individual Nations, there can be less incentive to deliver in NI.

With all this in mind we suggest that:

- there is a staged transition to a new outcomes based framework – a journey rather than a switch; the framework should be increasingly outcomes focused but should also still specify the scope of provision where this is necessary to achieve the policy aims
- a new framework is thoroughly tested against the needs of different audiences and how these are achieved to ensure that current value is maintained and grown
- outcomes are measured in ways which ensure they are achieved right across the UK and for different audience groups, including smaller groups with distinct public service needs

We suggest that Ofcom consults widely to test a new framework against the range of outcomes for different sections of the audience, and makes full use of its Nations and consumer advisory structures.

2. Do you agree with our proposals for a clear accountability framework?

The concept and success of PSB has always depended on clear and rigorous accountability on behalf of audiences. Ofcom is in a good position to hold PSBs to account as an independent regulator, which can draw on its Nations and consumer advisory structures. Thought should be given to the measures of success, and should go beyond audience reach and share to include value and impact, the delivery against public service aims and value for money.

A period of significant transition such as this usually requires more information about plans than would usually be the case, as well as closer monitoring of delivery in certain respects. We would expect Ofcom to identify where this is necessary.

ACNI will want to see how well the interests of NI audiences are served in clear and measurable terms, and this needs to be built into the framework of regulatory requirements as per Q2 above. We particularly note that, as a smaller Nation and one that sometimes needs a different approach, NI is seldom well-served by targets that are not Nation-specific.

The Committee thinks that it is vital that a new PSM framework provides for accountability beyond Ofcom to Westminster and the devolved Parliaments/Assembly. We believe that the lack of representation for NI on both the Ofcom and BBC Boards has been a weakness of the current structure, as has the absence of an MOU to allow for scrutiny by the NI Assembly. We welcome progress to address these issues through appointments and MOUs. This experience has shown how important it is that appropriate mechanisms are fully in place from the outset to ensure a new PSM framework develops in a way that delivers its purposes for audiences in all parts of the UK.

We also strongly believe that PSM will be better served if there is more direct engagement between providers and audiences, particularly by the publicly funded BBC. This contributes another important layer to accountability and to continuously shaping an offer that is responsive to the diverse and evolving needs of audiences. This could also serve important media literacy objectives in engaging audiences with the values and benefits of PSB so that

they derive maximum benefit and can play a fuller, informed role in directing how PSM develops and is paid for.

3. What do you think should be included in the PSM offer?

ACNI believes that the purposes of PSB remain as important to audiences, and wider society, as ever. This is amply demonstrated in research by Ofcom and others. The essential characteristics of the PSB offer - a broad range of high quality and distinctive content that meets the needs of diverse audiences and delivers clear public purposes – are still just as relevant in the PSM world. PSB plays a distinct role and provides value that will not be delivered by non-PSB providers because it is not commercially attractive.

Indeed, it is striking that, while so much has changed in terms of technology, the media market and consumption patterns, these core principles remain so relevant and can respond to changing societal needs and circumstances. For example, the need for trusted, impartial and accurate news is particularly felt in the context of the proliferation of unvalidated news and information on social media. Diverging circumstances for audiences in different parts of the UK underscores the value of local services, authentic portrayal and representation and also content that brings audiences around the UK together.

The Committee believes that content which informs and educates, through impartial and trusted content, sits at the very heart of the PSB framework and defines its unique value. However, it does not believe that the public interest will be served by reducing the scope of the offer, for instance where certain genres such as entertainment and dramas are also served by non-PSB providers. This is primarily because of the distinctive approach that PSBs can bring to any genre; the value of plurality in serving diverse needs, promoting innovation and driving up quality; and the role that breadth and range of offer plays in drawing audiences into a wealth of PSB content. In short, breadth and quality are prerequisites of a universal service from which wider value flows.

However, whilst ACNI also believes that the PSB offer is broadly right in scope, it doesn't always deliver as much as it needs to in order to remain relevant to all sections of the audience. The principle of universality which underpins the very *raison d'être* of PSB/PSM – and a universal funding mechanism - is dependent not just on new mechanisms to reach audiences in an increasingly online world, but also on developing content which stands out as relevant, reflective and respectful of audiences in all their diversity. ACNI is very conscious of the different audiences who do not feel that PSBs offer is sufficiently relevant or appealing to them.

The value of local content which serves the distinct interests and needs of audiences in NI cannot be underestimated. For many sections of the audience it is a major element of their viewing and listening and a defining element in their engagement with PSB, in spite of representing a relatively small share of broadcast hours and spend. Local programmes punch well above their weight in terms of viewing reach and share. UTV and BBC NI news programmes both perform very highly compared with their equivalents in other parts of the UK, reflecting a strong appetite for local news and current affairs. The local TV offer is tightly drawn across the range of relevant genres and audience needs so any reduction in investment could have a very significant impact on the delivery of public purposes. It would be unthinkable, for example, that current affairs/investigative journalism couldn't be

sustained at a meaningful level, or that Irish and Ulster-Scots programmes couldn't be provided for different interests and levels of fluency, or that there could be no regular 'home grown' comedy to complement network offerings.

In summary, ACNI considers that the PSM offer should support:

- content that serves different audience needs and culture around the UK, noting that more can be done to develop this offer, particularly for those who feel PSBs have little to offer them
- content that authentically reflects different audiences around the UK
- a particular focus on content that informs and educates
- breadth of content across the wide range of genres, which addresses but is not limited to areas of market failure
- content that meets the needs of otherwise excluded or vulnerable groups, including those with particular access requirements such as subtitling, signing and audio description
- high quality and distinctive content
- UK-originated content
- a plurality of providers

4. What options do you think we should consider on the terms of PSM availability?

ACNI believes that Ofcom should consider all the options which are required to ensure a level playing field and wide availability for PSM on all significant services and platforms. This is essential for PSBs to deliver their remits, reach audiences and meet their expectations of availability. In the case of the BBC, audiences will only receive value for money from the licence fee (or its replacement) if they can easily access relevant content.

We agree that there is a balance to be struck to ensure that the market functions, underpinning choice and investment. However, it is clear that if we are to achieve a flourishing media sector with the benefits of both PSM and non-PSM there is currently a serious imbalance which needs to be addressed through a measure of intervention.

It is part of the *raison d'être* and distinctive character of PSM that it exists to serve audiences in all their diversity across the UK. It is therefore vital that prominence for Nations and Regions content is an integral part of the solution from the outset. The PSM model will not be served if there is a two tier system, and it can be very difficult to close that gap once it is set.

We note the popularity of local content in NI, and the vital role it plays in the PSB offer for many different sections of this audience. Therefore any barriers to finding local content or moving seamlessly between local and UK-wide content will significantly impact on the performance of PSM as a whole in NI and undermine universality.

As noted previously, NI also has a distinct issue in relation to prominence for the whole public service offer, which includes RTE and the Irish language channel, TG4. This is an outworking of arrangements enshrined in the Good Friday Agreement and the principles apply as much to a digital world as a broadcast-only one. TG4 is an important element of public service provision for Irish language in NI, noting that NI does not have dedicated

indigenous minority language services equivalent to MG Alba and S4C in Scotland and Wales respectively. We ask that arrangements for availability and prominence of PSM take full account of these distinct arrangements for delivering PSB in NI.

On a more general note, we agree that the broad range of options for availability of PSM should be fully considered, including legislation to ensure prominence on connected TV, access to audience data, measures to ensure appropriate attribution, and – for commercial PSBs – access to advertising inventory and/or a share of advertising revenue. Where costs are involved – eg for technical development to enable players to be carried on new platforms – principles should be developed to direct how these may be apportioned so that these issues do not outbalance gains for PSBs in other areas.

We wonder if the move to a modern regulatory structure more suited to online platforms, alongside PSBs plans for digital/online development, can help to address the platforms' concerns about inflexibility whilst still protecting the interests of PSM. Anything Ofcom can do to remove barriers that are historic and no longer needed will be helpful.

Ofcom is well placed to take the lead in this and we suggest it may wish to draw on international approaches as relevant.

5. What are the options for future funding of PSM and are there lessons we can learn from other countries' approaches?

ACNI believes that PSM plays a unique and invaluable role in the UK and requires funding that is adequate to the scope of its broad brief. Wider industry benefit is lost if, for example, funding is not sufficient for PSBs to offer appropriate rates to independent productions or to play its wider role in training and development for the industry. Funding must also be sufficient to enable the transformation to a flourishing PSM model, which requires investment in a sustainable online future alongside the costs of maintaining many traditional broadcasting services. We are also very clear that the ambition of the public service brief cannot be delivered without stability of funding. We recognise that this was essential to the BBC's quick, fulsome and highly valued response to audience needs in the pandemic, for instance in supporting home learning and extensive public information needs as they related to different parts of the UK.

For the BBC this means that funding arrangements should allow for long term planning and should not, for instance, be annualised. We are also keenly aware of the impact of the huge decline in advertising on the commercial PSB sector at UK and Nations level and believe that merits particular consideration. Whilst commercial providers do not have the luxury of guaranteed licence fee income they also need to be able to balance income with obligations over the term of their licence or they might wish to hand the licence back.

Funding mechanisms must support universality which is at the very heart of the *raison d'être* for PSB/PSM. A subscription model to supplement or replace the BBC licence fee, even if becomes technically feasible, is not appropriate. It would limit public service provision to a subset of subscribers and have a disproportionate impact on groups who are not well served or connected into the benefits of PSB, or to some otherwise disadvantaged or vulnerable groups. We also believe that it is not feasible for the BBC to be funded in whole or part by advertising because this undermines the business model of commercial PSB providers by spreading scarce resource too thinly. We note the experience of RTE which has not been

able to achieve financial sustainability through a combination of advertising and licence fee. And for many members of the audience the value of an advertisement free service is very high.

We also believe it is essential that any funding agreement for the BBC protects its impartiality and independence from political or commercial interest. This is another reason why a funding settlement must be set for a significant period of years.

We agree that PSBs should seek to maximise their commercial revenue where this is consistent with, and secondary to, delivery of their public service obligations. For example, it is appropriate to generate revenue from international sales of programmes and formats, but not to the extent that commissioning decisions are based on what sells abroad at the expense of meeting UK audience needs. We do think, however, that these interests are not always mutually exclusive and that there should be room for innovation and creativity in meeting public service aims in sustainable ways.

In the same vein, we think it is appropriate that commercial broadcasters should plan to increase their digital revenue, noting that this requires some investment and regulatory change.

It is also vital that the licence fee – or any replacement – is modernised and future-proofed to reflect the different ways that content (including audio and online) is consumed.

We note that it is not always in the public interest for PSBs to maximise their income. For example, the creative economy as a whole has been significantly strengthened by terms of trade which give independent producers secondary rights to the content they have created, for international sale. This has been important to a small but rapidly growing independent sector in NI which cannot be sustained by PSB commissions alone.

We do not support initiatives which effectively top slice the licence fee (or its replacement) for wider purposes which impact on delivery of the core PSB/PSM remit for audiences.

A universal funding mechanism – whether it is a modernised licence fee, hypothecated tax, household levy or other mechanism – will depend on PSB's ability to develop its connection with audiences in all their diversity, including those who do not feel well served. We also firmly support the public's wish to ensure that, particularly in respect of the publicly-funded BBC, they receive excellent value for money and every proper measure to manage waste and inefficiency.

Finally, we believe it is in everyone's interests that there is a stronger public conversation and understanding of the value and true costs of PSB/PSM that can inform good choices in the public interest.

6. What do you think about the opportunities for collaboration that we have referred to? Are there opportunities or barriers that we haven't identified?

ACNI believes that there are more opportunities for PSBs to work together to strengthen the whole and that this is very much in the interests of audiences and wider society. *Britbox* is an excellent example but one which took a long time to emerge. It may be worth considering what it was about current arrangements that made it difficult to move more quickly.

The Committee considers that there is merit in PSBs working together to develop a common online player with open source technology, that would support prominence, findability, attribution and be easier for audiences to use.

We believe that the role for the regulator here is not to be prescriptive but to set the conditions which promote and reward timely collaboration where appropriate, allowing the PSBs to determine the ventures which will contribute most to PSM and retaining an appropriate level of creative competition.

We suggest that, at Nations level, collaboration is well established, both between PSBs and especially with other organisations. The BBC's enduring partnership with NI Screen is a stand out example of a collaboration which significantly helps to achieve otherwise elusive PSB aims, including enhanced portrayal and contribution to the local creative economy.

We agree in principle with the idea of PSBs sharing some services in order to achieve efficiencies and help them to be more competitive as a group. However the cost/benefits need to be carefully weighed up: in practice it may be the case that many of these opportunities are already competitively outsourced or the cost of change is prohibitive.

We suspect that such measures may be of relatively limited benefit in strengthening PSB in terms of the scale of challenges it faces. In order to achieve sustainability, the main focus has to be on levelling the playing field with SVODs and other streaming services. We think that it is important that more work is done to understand opportunities for PSBs to realise value for the content they provide to SVODs, recognising that this is a complex area.

7. What are your views on the opportunities for new providers of PSM?

ACNI is very supportive of this in principle as new providers can contribute to plurality, bringing diverse views, new skills and drive innovation, often in more agile ways.

We think that this is best delivered in carefully targeted ways, for instance where there is a need not being fully met by the main PSB providers or an opportunity which would benefit from greater plurality of input.

We consider that contestable funding can be a good way to achieve these outcomes because funds be tied to be very specific outcomes, sparking creativity and innovation from a greater mix of providers. The Irish Language and Ulster-Scots Broadcast Funds are excellent examples of the value that can be delivered and sustained. There are also some helpful international examples of this model being successfully applied. Contestable funding can help to leverage funding from a range of sources outside the PSB framework, and it can be an effective way to increase spending and public service outcomes around the UK. They can work with relatively small amounts of funding as well as on a larger scale.

It will be important to ensure that any such initiative contributes to the PSM ecology as a whole and doesn't detract from what the main PSBs need to deliver their remits, including their financial sustainability at a time when it is particularly challenged.

If major new players are to be considered, it will be important to set a clear and high bar to ensure that provision is genuinely and sufficiently contributing to public service aims in all the right ways, including for instance the need to be universally accessible. There should also be consideration of what may be lost if the balance tips too far – for example if a global

version of English became more prominent, diluting our linguistic culture and diversity. ACNI also considers that public service principles are not the sole preserve of PSBs. There should be space for non-PSBs to serve PSB principles without having to be designated or funded as such, for example where there are creative ideas that meet audience needs and are also commercially viable.