

1. Believes that PSM should continue to be anchored by longstanding companies which guarantee universality. Welcomes additional investment and delivery of PSM by other relevant channels and streaming services if fairness, cultural diversity, and a level playing field with existing players can be safeguarded through regulation. Also calls for legislation to protect the interests of UK audiences when it comes to subsidiaries of large overseas corporations such as Channel 5 and Sky. New players providing PSM must invest and promote local programming.
2. Believes that Ofcom should oversee new regulatory proposals, however regulation and accountability of the BBC should not be influenced by the government in power at any one time. Calls for an independent organisation to be set up to oversee the BBC and its finances, ensuring value for taxpayer money. ToT for indies should be reviewed to reflect the rise in foreign owned 'super-indies'. New providers must share audience statistics and info on advertising revenues, as current PSM providers do. There should be checks on non-consensual data gathering. All beneficiaries of PSM system must collect and share data on diversity, provide a plan to reduce inequality. The current diamond diversity network is insufficient, especially in freelance sector.
3. Existing obligations should remain in place. There should be further provision of investigative documentaries as they are a useful tool for accountability, especially in a time when disinformation is common. Further investment should be made into feature film and drama, particularly since leaving Creative Europe, with a focus on family films and younger audiences. The equivalent of the BFI in other countries such as France and Germany have far larger budgets. Greater investment also required in areas identified as market failures (religion, arts and children's programming), especially funding local production.
4. Believes that existing laws giving local PSM content due prominence should be extended to subscription and streaming services, and they should also carry all free to air PSB channels. There should be a clear definition of what constitutes PSM when it appears on a non-British streaming platform. Non-British multinational players should be mandated to pay appropriate sums for carrying PSB broadcasters' content to level the playing field. Recommendation algorithms can affect cultural diversity, creates filter bubbles so that users' chances of finding new content organically are reduced. These algorithms should be made transparent so that their impact on PSM can be monitored.
5. Believes that making funding contestable without adopting legislation to raise new funding would unfairly discriminate against existing PSB providers. 'Over the top' services benefit disproportionately in relation to local services. Non-British streaming platforms benefit from AV market and British audiences without appropriate obligations placed upon them. The 51% quota for local production met by PSB channels should be met by all UK channels and relevant PSM providers. For those unable to do so, investment obligations in local/drama/film/documentaries relative to turnover could be considered. The 2% Digital Service Tax introduced by UK Govt in April 2020 should be extended to SVODs. Examples from other countries: French Belgium requires foreign publishers to contribute to national programming/film fund, max of 2.2% of a turnover of 20mil+. Italy is discussing a 12.5% contribution of annual net revenues by SVODs to a national fund. Poland require on-demand

providers to pay 1.5% of revenues to the Polish Film Institute. Portugal proposing on-demand platforms contribute 1% of revenue to national fund.

6. All players in PSM should be mandated to invest far more in British independent film in conjunction with BFI etc. Britain should work more with the Commonwealth and other countries whose content is under-represented for further cultural diversity. Policy options on Preferential Treatment, Article 16 of the 2005 UNESCO Convention should be referenced for policies to enhance collaboration. Measures should be taken to safeguard creators work being exploited online through platforms such as YouTube. Relevant clauses of the 2019 EU copyright law should be studied and potentially transposed into UK law.
  
7. Believes this is an opportunity for new providers to invest in British drama/film and investigative documentaries, and give this content prominence. As they mentioned previously, concessions should not be made without addressing regulation to ensure a level playing field with existing local producers and fair remuneration for UK artists, authors and producers, particularly regarding royalties and rights. The significance of the BBC is relevant. Any change in regulation should provide adequate funding to sustain its centrality. They argue that the BBC forces commercial broadcasters to compete on quality, as opposed to crowding them out.