

# **Response by the Central Communications Board of the Church of Ireland to the Future of Media Commission**

**January 2021**

## *Introduction*

The Central Communications Board of the Church of Ireland continues to recognise the importance of the media in reflecting, serving and informing Irish society, drawing on perspectives and life across the island of Ireland. An engaged public is important for ensuring that the media connects well with its readership and audiences. We welcome the Future of Media Commission's establishment and its role in exploring the future of public service in the media.

Public service media – whether in news content, cultural and creative output, or religious broadcasting – have played an essential role in supporting Irish society during the pandemic in a time when citizens have been more apart physically than ever before and lacking a natural sense of community. We note the increased audiences for broadcast religious services, which have met a spiritual need when social gathering has not been possible or only permitted in a limited way.

Social and economic factors can be major barriers to accessing media content. In particular, paid-for services can limit a person's ability to experience a cultural or sporting event if their disposable income is limited, therefore resulting in social exclusion from significant parts of our national life; this will become a more significant issue as the economic consequences of the pandemic are increasingly felt. Good quality broadband access is now often the key to receiving a range of online content, but access is uneven across the island.

Paid-for media often favours entertainment over public service content, and a move from advertising-funded content to user-funded content can result in the further marginalisation of people on lower incomes and non-economic areas of programming sectors being placed at a disadvantage. We saw last year how children from lower income families or those in areas without broadband were disadvantaged when it came to home-schooling during lockdown. The media playing field is far from level. Broadcasting has a much wider and more significant societal purpose over and above the role of commercial revenue in the sector. Indeed, it is in the national interest to maintain a public service broadcasting platform, for the purpose of providing a point of social cohesion, in a form that is bigger than news, current affairs and sport.

The quality of public discourse on social media is often polarised but other, more established, media platforms have a very important role in protecting the public square as a place of respectful debate where all voices can be heard, including those from a Christian worldview. The Church of Ireland has a unique perspective in ethical debates on pertinent issues, and a greater inclusion of voices from a range of Christian denominations and other faiths may help to attract wider audiences.

### *Question 1*

- *How should Government develop and support the concept and role of public service media and what should its role in relation to public service content in the wider media be?*
- *What can be learned from the evolution of public service media over the last decade?*
- *What systems may be required to support and sustain public service content, e.g. high quality, independent journalism, in an increasingly competitive and consolidated market?*
- *How might public service media be more effective in promoting the Irish language, sport and culture?*
- *How might public service media better respond to the needs and expectations of the public?*
- *What can we learn from other jurisdictions?*

### **SUMMARY**

- **Collaboration with other public service content producers;**
- **Shared access to iPlayer platforms across the two jurisdictions on the island of Ireland;**
- **Importance of fostering mutual understanding between communities as a public service content objective.**

### ***Development and support***

The last decade has witnessed considerable historical change, recorded and reported by Ireland's news media and informing the whole of society. This underlines the long-term importance of funding public service media.

The island of Ireland is well-served by RTÉ, which fulfils a unique public-service role in the State and has an all-island reach. The Central Communications Board likewise recognises the public service role of TG4 and BBC Northern Ireland, and the public service values which can inform commercial broadcasting.

In an increasingly globalised media, a smaller number of writers, artists and producers have a greater influence on the content and narratives consumed by an international set of audiences. The relevance of ensuring that local content, produced within the island of Ireland and resonating with Irish society's experiences and values, has therefore never been more important. Access to the Irish market by global media companies could be made conditional on a contribution to a budget for public service media, to benefit local public service media.

Another dimension to this, is the enhanced value in terms of public service content that can be achieved by collaboration between the three public service broadcasters on the island of Ireland. In the post-Brexit and post-Good Friday Agreement environment, this may require more pro-active support by the respective state bodies and regulators.

RTÉ Player and BBC iPlayer have had a particular role during the coronavirus pandemic in providing entertainment and dramas on repeat, to give viewers an alternative to news coverage of Covid and a balanced selection of overall content at a time when it has been logistically difficult to produce new content. Playback services can be beneficial in attracting and keeping younger audiences, but, again, depend on internet access. Perhaps ways can therefore be found

to give Player platforms a presence as terrestrial channels to provide sustainable widespread access, even in geographic areas or socio-economic groups where internet access is limited.

Irish and Northern Irish audiences will benefit from being able to access both RTÉ Player and BBC iPlayer in a post-Brexit world. Securing this level of inter-connectedness would be of benefit to Ireland and RTÉ in creating a more substantial footprint for the public service content sector as much as BBC Northern Ireland will benefit from wider access to its output. Added value will benefit both audiences in Ireland and Northern Ireland.

Irish public service programming is of huge benefit to the Northern Ireland audience, insofar as Ireland funds a much greater volume of ‘local’ content than BBC Northern Ireland can afford to do and religious programming, in particular, is culturally accessible across the island, whether broadcast worship or programmes based around religious and ethical content. The same argument holds true for Irish language broadcasting, including religious programming in the Irish language. Equally, BBC Northern Ireland contributes a significant share, relative to its size, in terms of BBC national content. There has been a move on the part of the BBC to use the iPlayer service as the first point of access for that content, making on-demand viewing a norm. Consequently, for RTÉ to maintain a dynamic as a national public service content generator, there is likely to be merit in acquiring shared access to this content. Agreeing to co-operate in this way will ultimately make public service provision more attractive. Collaboration is increasingly important in funding drama content, in particular, and a pragmatic approach to the development of this type of popular cultural content is likely to be a key factor in the longer-term sustainability of public service media provision, which, in turn facilitates providers to continue to provide space for religious programming and Irish language and local documentary programmes. Thus, the Central Communications Board would suggest that public service media is enhanced in both jurisdictions by greater co-operation in terms of free access to the two i-Player services for communities north and south of the border.

### ***Local relationships***

With 1,078 places of worship, grouped into 448 parish units across the island of Ireland, the Church is aware, across its mission and ministry, of the importance of sustaining local community life and values relationships within businesses and other significant contributors to those communities. In an unanticipated paradox, over the course of the pandemic, life in Ireland has become more local than has been the case for many years; yet, having more time at home has led to the greater consumption of global digital media, as well as increased consumption of local content.

As restrictions continue, there could well be an opportunity to encourage people to shop and purchase services more locally for a sustained time. More readers may recognise the value of local news, especially as it adds a broader outlook than daily news bulletins or online posts. While online advertising continues to be a major challenge, there is some potential for local media to rebuild advertising revenue and their position as the voice – and a marketplace – for communities. This includes opportunities to promote aspects of local culture, including the Irish language, which would have no readily available space in the global media.

Irish media outlets may benefit from lessons learned elsewhere which could be adapted to local contexts on the island – e.g. the University of North Carolina’s research into protecting and sustaining community journalism (through carefully reducing legacy costs, building a vibrant sense of community, and pursuing new revenues).

### ***Culture and faith***

The dominance of social media, and other forms of digital media, by a relatively small number of global companies can mean that online content broadly reflects a perspective shaped more by a particular form of US culture rather than a genuinely global worldview. This certainly strongly influences Ireland – especially given our island’s long-standing relationship with North America – but is not fully representative of Irish society.

As mentioned, there is considerable value (cultural and financial) in sustaining good local journalism and content production. Ireland, in its entirety, is a very diverse society with a complex history and there is scope for developing a greater self-understanding of life on our island, including regular coverage and debate across the border between our two jurisdictions. As an all-island organisation, we benefit from a range of voices within our own debates and discussions. Northern Ireland and the Republic of Ireland have much to learn from each other. Public service media content provides an excellent platform for the whole of society to increasingly acknowledge and appreciate both its differences and its shared common ground.

The Church of Ireland has, as broadcasting has developed, viewed with satisfaction the manner in which public sector broadcasters and many of the independent stations have taken account of the part that religion and social issues in general play in their communities. The Church has always expressed publicly and to RTÉ our appreciation of the time and expertise that it devotes to the broadcasting of religious services and programmes with a religious aspect.

We would ask that the coverage of the beliefs and perspectives of religious faiths be approached with dignity and respect, including in situations where disagreement and legitimate criticism has arisen. While it is important to defend the freedom of speech that allows us to explore our world including its religions and religious institutions though humour as well as rigorous discourse, many members of the Church of Ireland are concerned that Christianity has become an acceptable target for humour that would be considered to go beyond the line were it directed to other faith groups. As an example, many members of the Church of Ireland were disappointed by a recent televised reference which casually disparaged God as a rapist and are concerned that Christianity may be the only faith which is subject to unrestrained criticism in certain areas of media content.

Among the issues addressed by the Board over the years have been the nature and presentation of the Angelus – as a brief moment of reflection – to have ongoing meaning in a more pluralistic society and also whether religious bodies, most of which are designated as charities under Irish law, should be allowed to advertise their services alongside commercial entities, which the CCB felt was not in keeping with their religious objectives.

The Church of Ireland believes strongly in maintaining the place of religious content in the public service remit as having importance in reflecting the developing social demographic in Ireland and serving many fundamental social goods, such as retaining a sense of connection for people who may be housebound or, indeed, marginalised for a variety of other reasons. Programmes offering religious content are also providing a subtle context for ethical debate across the public service provision of wider news and current affairs and drama.

## Question 2

*How should public service media be financed sustainably?*

- *What is the best model for future funding of public service media in Ireland? What approach best supports independent editorial oversight while achieving value for money and delivering on public service aims?*
- *What opportunities exist to develop and implement business model and organisational changes within the public service broadcasters (RTÉ and TG4)?*
- *How might content commissioning, including by RTÉ, TG4 and the BAI Sound and Vision scheme, be adjusted/improved/reformed to better achieve public service aims?*
- *How should public funding or tax reliefs be apportioned to Public Service Content providers?*
- *What does the shift in advertising revenues towards big tech firms mean for the future of print, online and broadcast media?*
- *What role is there for alternative funding models for Public Service Content providers – voluntary, cooperative, crowdsourcing, subscription?*

## **SUMMARY**

- **Review the method of licence fee collection;**
- **Introduce an inflation-linked or cost-of-living-linked component to the licence fee to ensure funding levels for public service providers;**
- **Continue to apply state funding to exempt elderly and registered-disabled groups from licence fee;**
- **Review application of EU 25% of revenue rule to enhance local content;**
- **Effectiveness of Ireland’s media regulatory system.**

## **Context**

It has been said that the crucial difference between broadcasting in Western Europe and the United States is that in America broadcasting has, from its earliest days, been seen as an adjunct of the commercial sector while the European experience has been to regard it as a public service. The ‘public service’ ingredient of broadcasting in the US is privately financed from various components of civil society whereas, in the United Kingdom and Ireland, for example, broadcasting itself is deemed to be a public service and is regulated as such by charter or legislation.

The concept of public service broadcasting was most clearly defined by the first Director General of the BBC, Lord Reith, who laid down what might now be called its ‘mission statement’ as being ‘to educate, to inform and to entertain’. The founding fathers of Irish broadcasting shared his view that Radio Éireann (as it then was) should maintain a high sense of social responsibility.

There can be little doubt that public service broadcasting as we know it is under threat. To some extent, this comes from commercial interests, whose bottom line is not merely financial gain, which is understandable, but also in some cases a desire to remould society in their own image. The Archbishop of York, writing in *Radio Times* in December 2020, noted ‘the echo chambers of social media and fake news that often goes with it’ have led to mistrust and cynicism and pointed to developments in certain parts of the world where broadcasting

channels have become the mouthpieces of political parties or other vested interests. Traditional public service broadcasting can also be undermined by politicians who resent criticism of their policies. With this in mind, a number of media organisations, including the BBC, *Financial Times* and *Washington Post* have formed a partnership of global publishers, the Trusted News Initiative, to alert partners to disinformation at the moment it arises.

### ***Financial considerations***

The Board supports the sustaining of RTÉ and BBC Northern Ireland on a strong financial footing. There is a clear role for subscriptions in print media but applying a subscription model to broadcasting would fragment its audience, which is only likely to further undermine the PSB nature of the service, given that the total Irish and Northern Irish audience is already very small. This would not be in the best interests of public service. Maximised collection of the licence fee is the strongest way to maintain a solid financial base for public service broadcasting but, given the negative experience of the last decade in which the licence fee remained unchanged over an extended period, the Board would also recommend including a mechanism to reflect general inflation or other cost of living measures to ensure that the real level of funding is maintained. The method of collection appears to be declining in its efficiency and a review of this should be undertaken so that the burden of the licence fee is not falling on the shoulders of a limited section of the population. The Central Communications Board strongly supports the principle of continued exemptions from TV licence fee payments for older people in each jurisdiction, and perhaps also of other specific groups such as people with a registered disability. The Board expresses the view that the subsidisation of these exemptions should continue to be borne by the state not by the broadcasters.

All possible avenues should be explored to maximise the collection of the television licence fee, set at a realistic level on a long-term basis to protect the core financial base for public service broadcasting (including trusted news content and free coverage of sporting and cultural events) and high quality independent production, which can be further enhanced by advertising income.

Advertising revenue generated by broadcasters directly supports journalism and content production within the island of Ireland whereas much online advertising currently delivers a more limited public service outcome to Irish viewers, listeners and online readers. There is merit in exploring whether the EU's quota of 25% of revenue to be spent within the EU could be applied in a more specific way in Ireland and, in particular, help to nurture and train a talent base for the independent production sector, thus providing a secure income stream which is additional to the licence fee.

As we care for the welfare of Irish society, we can have no choice but to have a concern for the preservation of a public service dimension to Irish broadcasting. We recognise the funding challenges involved and that RTÉ, dependent to a large extent on advertising, has to take serious account of ratings. However, while we recognise that this has a legitimate influence on programme content, we would stress the importance of ensuring that the public service remit is not endangered by an excessively 'light touch' regulatory system. Surely recent Irish experience of the danger to society of such an approach is manifest to all?

*Question 3. How should media be governed and regulated?*

- *What regulatory changes at EU or global level might impact on the governance of public service media in the period ahead?*
- *What challenges are posed to a vibrant, independent public service media by increasing consolidation/declining plurality of ownership in the Irish market?*
- *Are current legislative and regulatory controls for public service media adequate?*

**SUMMARY**

- **Regulation should aim to maintain plurality of ownership in print media;**
- **Regulations should strive to support locally generated content representing various communities and interests;**
- **The current regulatory framework is effective and responsive to issues raised.**

***Plurality***

As all media, in some way, reflect the viewpoints of owners, a wide plurality of media ownership is the most appropriate model for media governance. This remains more achievable in the area of print media. There is a trend towards globalisation of content in broadcast media.

In the broadcast area, this is a huge challenge for Ireland, as, even in the larger international context, the emergence of dominant content suppliers and platforms is presenting a challenge to the sustainability of even significantly larger national public sector broadcasting services.

The print media landscape in the island of Ireland has also moved, over time, from one in which there were a large number of local owners (e.g. newspaper proprietors) to a smaller concentration of ownership in broadcasters and newspaper (and multi-media) groups.

There would be merit in encouraging a wider plurality of media owners, provided that this would be financially sustainable – e.g. the development of regional media groups which could be more viable than town or county-based media operations but would still allow for a variety of local voices to be heard. Independent local media outlets and non-partisan national public broadcasters should be commended for their resilience in a rapidly changing market.

The Central Communications Board would like to see more acknowledgement of the need to secure sustainable public service media at the national level, and recognition of the difficulties presented by global entertainment channels. This might require review of competition rules in respect of state supports for public service media providers and a review of the EU rule around application of the 25% of revenue to local content to see if this can be more advantageously managed in the Irish context as mentioned above.

***Local media operations***

‘News deserts’ are a concerning development in contemporary print journalism in the USA – i.e. communities, either rural or urban, with limited access to credible and comprehensive news and information that feeds democracy at the grassroots level. The priority given to maximising income for shareholders is not always compatible with maintaining a good quality local news service, without which a community can risk losing its first draft of history, reliable reporting from courts or local councils, or the best positive stories that can be found in its neighbourhood.

Response to Future of the Media Consultation  
Central Communications Board of the Church of Ireland

The Church of Ireland places a high value on local communities and, in turn, benefits from its ability to share ideas, resources and a sense of shared identity across the island. In all discussions around the future of the media, it is important to recognise and support how the media contributes to the quality of life in local areas as well as helping people to feel that they are part of the life of the nation as a whole.

***Regulation***

The Church of Ireland Central Communications Board felt that the current system of regulation is effective and accessible when it is necessary to raise an issue or complaint and that matters are dealt with fairly and within an appropriate time scale

*Response submitted by the Central Communications Board of the Church of Ireland to the Future of Media Commission, established by the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media, Government of Ireland.*

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