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The implied audience of communications policy making: regulating media in the interests of citizens and consumers

Book section

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Changing regulatory regimes and the implied audience

Most books with 'audiences' as their subject matter do not, it must be said, address media policy and regulation, so the reader of this chapter may already be puzzled by our title. To take one prominent example, Abercrombie and Longhurst (1998) insightfully delineated the changing nature of audiences and audience research over the twentieth century, noting the near-demise of the effects tradition (at least in Britain), the (short-lived) celebration of audience resistance, the rise of viewing as spectacle, the guerrilla actions of fans and the diffused nature of today's diversified, socially embedded audiences. But they show little interest in contemporaneous changes in public service provision, media ownership, the global media economy, relations among media and state, the digital revolution or, our focus here, regimes of regulation. On the other hand, in their contemporaneous volume on media policy, McQuail and Siune (1998) made little reference to research on audiences, although implicitly the audience is everywhere – in their inquiry into the role of citizens in a mediated democracy, the future of the masses in an individualised society, the prospects for national cultures under globalisation, the role of users in an interactive media landscape, and the protection of public service principles in liberalised media markets.

The policy landscape seems to have been bracketed off by audience researchers as practical rather than intellectual, parochial rather than grand in vision and, most problematic, as positivist (or administrative) rather than critical in purpose. Policy research has returned the favour. But in a context where almost everything is mediated, with little escaping the ubiquitous embrace of the digital age, we invite audience researchers to rethink their (dis)engagement with policy debates and to and engage theoretically, empirically and critically with the national and international management of powerful media and communications institutions and processes. Some audience researchers do recognise the relation between policy and power. Ruddock's *Investigating Audiences* (2007) reads audience reception studies through the lens of such policy-relevant issues as harmful media content and the democratic potential of new technology, though he does not engage directly with the specific policies which research may either support or critique. Having reviewed the reception tradition in *Studying Audiences*, Nightingale (1996: 149) follows Foucault in concluding that, 'for policy research, examination of the audience-industry relation as a technology of production, by means of which audience-text links are produced as marketable commodities, would seem a necessary beginning.'

At least two recent trends link the study of audiences with media policy. Developments in public sphere theory and the revival of interest in civil society invite a rethinking of the connections among media, audiences (or publics) and public policy in order to find a positive response to the growing democratic deficit in Western countries. This has drawn a number of critical audience researchers into focused consideration of how policy may enshrine, or undermine, the communicative requirements of democratic engagement (e.g. Dahlgren, 2004). Secondly, the confrontation of globalisation theory with localised audience research (as with Liebes and Katz' *The Export of Meaning,* 1990) triggered recognition of 'glocalisation' on a far wider cultural scale than usually reached by audience theory (Tomlinson, 1999). Indeed, belated recognition that global audiences are 'big business' has stimulated attempts to move beyond Dallas Smythe's scathing, post-Frankfurt School critique of the commodified audience and to transcend the sterile opposition between cultural and

political-economy approaches to audiences (consider Hagen and Wasko's *Consuming Audiences*, 2000, Seiter's *The Internet Playground*, 2005, Butch's *The Making of the American Audience*, 2000, and Buckingham's *After the Death of Childhood*, 2000).

These trends, in turn, invite some rethinking of the perception of policy-relevant research as practical, parochial and positivist, especially since policy research often addresses audience-relevant themes - tastes and pleasures, harm and offence, the public interest, communication rights, consumption practices and contexts, and so forth. In seeking 'to restore a sense of agency and politics to a process often described in rather technical and administrative terms', and so to advocate the critical/participatory principles of inclusiveness, legitimacy, public engagement, the dispersal of power, Freedman (2008: 217) quotes Hesmondhalgh's (2005: 95) conceptualisation of media policy as the 'common concern with collective subjectivity'. Whether or not all policy researchers concur with this definition, it suggests an agenda that critical audience studies could endorse, one that should not be left solely to the macro-theory of economy or political science nor to administrative and market researchers.

To pursue this, we propose a twin strategy: first, to identify and critique the implied audience of communications policy-making and, second, to draw on the insights of critical audience studies to reshape that implied audience so it reflects the concepts and findings of academic audience research and, importantly, so that it enables mediated citizen interests and communication rights. In so doing, we hope to identify an alternative to the approach of Foucault-inspired Governmentality theorists who regard 'the audience' as a construct developed by industry and the state for their own purposes (Ang, 1996; Ouellette & Hay, 2008) and, further, who regard academic audience research as complicit in a vocabulary that seeks to contain and govern audiences. In other words, while recognising that the concept of the audience is indeed problematically mobilised in the conduct of commercial and regulatory practices, we wish to explore the possibility that critical scholars need not turn their back on audiences *per se* but, rather, can avoid enrolment in these governmental processes by first critiquing institutional discourses and interests and, second, developing an alternative and critical account of audiences and their interests.

Thus this chapter explores whether the insights and findings of academic audience research can be used to analyse, critique and engage with communications policy making. We take as our point of entry 'the implied audience', a term by which we mean to make explicit the commonplace but often unnoticed and, arguably, ungrounded assumptions that get mobilised in policy discourses about how people ordinarily relate to media and communications (Livingstone, 1998). Unlike some of the explicitly contested elements in policy debates – the role of the state or the market, public service broadcasting or the regulation of the press, to name but a few - the role of the audiences is little focused upon. As Webster & Phalen (1994: 19) observe, 'a review of the policymaking process does not reveal clearly articulated, systematically applied audience paradigms'. But this does not, however, render implicit assumptions about audiences innocuous, for they influence both provision and the regulation of provision (Born, 2004; Syvertsen, 2004).

We write in the wake of the formation in the UK of a converged regulator, the Office of Communications (Ofcom), by the 2003 Communications Act. Ofcom's design as a

principled, (almost) sector wide regulator, established by act of parliament and funded by industry to replace multiple regulators of diverse provenance and practices, was widely welcomed as a constructive response to the emerging challenges of a converged, global media market. Its primary duty – to further the interests of citizens and consumers, along with responsibilities in relation to public service broadcasting, universal service provision for broadband, the management of spectrum and much more, with an intriguing addition, the promotion of media literacy - gave rise to new hopes and a perhaps unprecedented level of policy engagement and activism among critics, civil society groups, media reformers and academics.

Writing 20 years ago, Seymour-Ure (1987) scathingly described the confusion that was British media policy as 'now you see it, now you don't', listing a litany of regulatory inconsistencies across the media landscape, itself ill-defined. The implication was that a sector-wide consistency is desirable, as also echoed ten years later by Collins and Murroni's (1996) update on the continuing multiplication of regulators and regulatory ineffectiveness. It may therefore seem surprising, the next decade having brought Britain a converged approach, that some now doubt the value of a single all-powerful regulator (Harvey, 2006) and more have become critical of Ofcom's processes and achievements (Freedman, 2008; Hardy, 2008).

In a recent project, the 'Public Understanding of Regimes of Risk Regulation', we examined how complex risks faced by the public are being addressed by changing regimes of regulation (Livingstone & Lunt, 2007). These are changing not just because of technological and market developments in the media and communications sector, but also in response to wider political moves away from the social contract of welfare liberalism, moves that seek to disperse the power of the state upwards (from nation to international organisations) and downwards (to the third sector/civil society, to a self-regulated private sector and to individual households; Black, 2002; Clarke, Newman, & Smith, 2007; Jessop, 2002; Lunt & Livingstone, 2007). Specifically, we asked, on the one hand, how the public is represented within the new culture of regulation and, on the other hand, how the public understands its changing role and responsibility within communications and financial service regulatory regimes, with the latter potentially influencing personal responses to communications and financial risks. Thus we traced how Ofcom represents the interests of the public (audiences, and also those excluded from particular audiences), undertakes consumer education and engages with stakeholders (including audiences). These are all regulatory roles for which critics have long called (e.g. Blumler & Hoffman-Riem, 1992), but they require the regulator to achieve a complex, arguably even impossible, balance between economic regulation, consumer protection and furthering citizen interests.

In practice, we observed Ofcom's predominant focus on market regulation, thus prioritising a conception of the public as media-savvy consumers who demand quality, choice, diversity and value anytime, anywhere. This audience-as-consumer can usefully highlight certain problems arising from technical and market innovations – for example, in the case of broadband, problems of digital illiteracy and digital exclusion. But, unlike alternative conceptions of audience-as-citizen, which we explore below, the consumer model does not pose any fundamental challenge to the 'normal business' of what is, after all, primarily conceived as an economic regulator. It particularly struggles to assert any collective legitimacy for the public interest, public service or public rights. And nor, despite considerable policy anxiety over the

emerging array of risks facing ordinary people – newly worried about as the digitally excluded, the offended or misrepresented, the vulnerable or victimised, the targets of new scams or privacy invasions – can the consumer model satisfactorily redress what Beck (1986/2005) has termed 'the individualisation of risk'; namely that the navigational (or decision-making) task for the public gets ever harder, if potentially also more rewarding, while the risk of getting things wrong or of being left out falls as unequally as ever.

One might ask who should speak for audiences and publics here? To be sure, audiences occasionally represent their own interests in what are, at times, public-facing, transparent and consultative regulatory deliberations. More often, their concerns are revealed through the controlled routes of customer care and complaint procedures, with some use of democratic channels such as protests to their Member of Parliament or participation in activist groups. Ironically, it seems that it is those media organisations and regulators whose interests may precisely conflict with 'the public interest' who, nonetheless, have the resources to speak on behalf of the audience through the commission and conduct of substantial amounts of market or social research. As a result, it appears that, in the plethora of contemporary multistakeholder deliberations that Benhabib (1996, p.76) describes as 'mutually interlocking and overlapping networks and associations of deliberation, contestation and argumentation,' audiences are less often participant than co-opted, less heard than spoken for.

Although our immediate focus is British policy, discussions with colleagues internationally suggest that the various ways in which we have observed audience-related issues to come to the fore in policy debates have wider resonance, not least because, in a globalising media landscape, neo-liberal regulatory regimes are increasingly influential. In what follows, we outline two recent case studies in order to develop the argument for a critical academic engagement with policy making: one concerns the fraught and largely unsuccessful attempts of academics and civil society groups to get citizens' communication rights onto the policy agenda; the other concerns the more successful efforts to promote media literacy, this ironically resulting in a policy that is both more modest and more easily co-opted in its claim to audience 'empowerment'.

Audiences as citizens or consumers? The communication rights debate
In our first case study, we examine how the duty given to Ofcom to regulate in the interests of citizens and consumers came about during the passing of the Communications Act and has, subsequently, been debated. From our perspective as audience researchers, this debate has taken the form of a contest between two different conceptions of the public as audience – as citizen, and as consumer – with both state and regulator variously cast as playing the role of mediator. Since the role of the regulator in furthering the interests of consumers is, in fact little contested, this debate more fundamentally forces onto the policy agenda the role of media and communications in enabling or impeding the interests of citizens in a democracy. While for media and communications scholars this raises complex and long-discussed questions about participation, civil society and the public sphere, the regulator debates tend to distil key arguments in a highly focused manner but with a still-uncertain outcome that reflects the fragility of emancipatory democratic agendas in this field.

This case study is best introduced through a necessarily abbreviated narrative of events leading to the passing of the Act, focused on a sequence of discursive struggles in which any reference to the interests of citizens was very nearly dropped (Livingstone, Lunt, & Miller, 2007-a; Puttnam, 2006). We begin, perhaps arbitrarily, in December 2000, when the Communications White Paper was published which first proposed a converged regulator for, it stated, the benefit of consumers (by ensuring choice and value for money) and citizens (by ensuring standards, fairness and privacy). After a period of consultation, debate and, no doubt, lobbying, the Draft Communications Bill of May 2002 proposed that Ofcom should further the interests of customers of broadcasting and telecommunications services – no mention of either citizens or consumers. The public debate was, in consequence, greatly intensified and in July 2002, Lord Puttnam's Joint Select Committee concluded a wide-ranging public consultation by rejecting the customer of the Draft Bill and recommending that Ofcom should have two principal duties – to further the interests of citizens and of consumers.

Doubtless in recognition of this struggle over the very terms by which ordinary people could be legally referred to, a 'note on terminology' was jointly issued by the then Departments of Trade and Industry, and Culture, Media and Sport. This explained that the consumer interest referred to an economic focus on networks and services for the benefit of individuals; by contrast, the citizen interest referred to a cultural focus on content for the benefit of the community. In Ofcom's proposed (and eventual) institutional structure, these 'twin peaks' of the public interest in communications were built into the institutional design of the regulator through the establishment of the quasi-independent Consumer Panel and the internal Content Board respectively. But, surprising to many, the Communications Bill of November 2002, Clause 3 (General duties of Ofcom) specified only that Ofcom was 'to further the interests of consumers in relevant markets, where appropriate by promoting competition' – any mention of the citizen had again disappeared. A heated debate in the House of Lords followed in June 2003, with Lord Puttnam leading the case for the citizen interest against the Government. In a triumph for civil society advocates – who had coordinated their activities under the banner of a body called 'Public Voice', Blair's Labour government lost the vote, despite its arguments that the citizen interest is already covered by the consumer interest, that the citizen is not a term that can appear in any UK law for it refers only to immigration status, and that this is all an unnecessary semantic distraction for everyone should trust Ofcom to do the right thing.

Thus in July 2003, the Communications Act was passed, requiring Ofcom 'to further the interests of citizens in relation to communications matters; and to further the interests of consumers in relevant markets, where appropriate by promoting competition.' Yet any victory was short-lived. As Black (2002) argues, the letter of the law is meaningful only through its interpretation, and a frustrated Ofcom immediately re-interpreted the Act by framing its mission statement thus: 'Ofcom exists to further the interests of citizen-consumers through a regulatory regime which, where appropriate, encourages competition'. This positioned Ofcom primarily as an economic regulator by, first, conjoining citizen and consumer as the citizen-consumer and, second, foregrounding competition as the primary instrument to further the interests of both. Although widely contested (Redding, 2005), this hyphenated formulation has only recently rather quietly disappeared from Ofcom's walls, reports

and website – itself extraordinary, as no publicly available minutes of the Board record a decision to change its mission.

More important than the mission statement, however, are Ofcom's actions. Ofcom rapidly established institutional structures and roles relating to consumer policy: it publicly reported its progress in meeting consumer concerns; it adopted a 'consumer toolkit' developed by the Consumer Panel to ensure that consumer interests are taken into account at all stages in policy development; and it established a range of public-facing initiatives to offer advice to consumers directly. Strikingly, little equivalent activity or accountability was forthcoming regarding actions to further citizen interests. Repeated requests from academics and civil society groups to define and report on Ofcom's efforts to further the citizen interests received little response. Moreover, Ofcom's policy documents persistently confuse its duties, scattered with haphazard references to 'consumers' (mainly), 'citizen-consumers' (until recently), 'citizens and consumers' (though generally in relation to consumer issues) and, just occasionally and not always appropriately, 'citizens'.

An example is its 2007 document, *Taking account of consumer and citizen interest. Progress and evaluation – 12 months on*. This elides the twin duties into one by stating, 'Ofcom has a principal duty to further the interests of both citizens and consumers', and then provides a wealth of information regarding consumer-related activities. As for citizens, to paraphrase Seymour-Ure, it seems a case of 'now you see it, now you don't'. The report outlines a planning process aiming 'to develop a framework which Ofcom can use to prioritise and plan its consumer policy programme of work and response appropriately to consumer interest related demands'. This is implemented through projects aiming 'to develop a consistent and coherent framework to ensure citizen and consumer interests are taken into account appropriately throughout Ofcom's policy and decision making processes'. The outcomes are then communicated in order 'to ensure we articulate and communicate our decisions in a way that allows consumers to understand our decisions and explains what the outcomes are for citizens and consumers'. Such inconsistencies are explained away in Ofcom's Consumer Policy Statement of December 2006, where it is stated that "consumer and citizen interests are closely related and that for many people, the distinction is not very important" (p.8). It also stated that 'Citizen-related policy is concerned with changing market outcomes in order to meet broader social, cultural or economic objectives' (p.8). But this frames the citizen interest reductively as an intervention in the market or a response to market failure, and it omits from the list of (undefined) broader objectives that which to most observers is key, namely the civic or political.

Belatedly in July 2008, Ofcom put out for consultation a discussion paper entitled 'Citizens, Communications and Convergence'. As it said, 'The purpose of this paper is to discuss and clarify Ofcom's role in furthering the interests of citizens. It sets out our thinking on this issue and we hope that it stimulates debate.' Noting that 'the fact that we have not published an equivalent statement on citizens has led some stakeholders to suggest that Ofcom lacks commitment in discharging its responsibilities in this area' (p.4), the paper documents how Ofcom has, in practice, furthered the citizen interest in some key ways: public service broadcasting has been at the top of the agenda for the past five years; the question of universal service for broadband is rising up the agenda; community radio has been strengthened by

Ofcom's efforts; its digital dividend review, digital inclusion and media literacy strategies, among others, have all furthered the citizen interest. But as Chair of the Content Board, Philip Graf, said to the civil society group, Voice of the Listener and Viewer, these and other activities result in 'a bit of a laundry list'. What is still lacking is a coherent and principled framework for scoping, underpinning and extending the citizen interest in communications matters.

It is unclear that Ofcom possesses the necessary vision for such a framework, for it stated in the consultation that 'we tend to think of a market as a vibrant, enticing place where consumers interact, but there is not an equivalent metaphor for the way that citizens interact in civil society' (p.8). The 'we' of this claim may be unfamiliar to those who have suffered from the credit crunch, fuel poverty, or even mobile phone scams. The excitement of the market is surely also foreign to those who fear the might of Rupert Murdoch, the end of regional television news or the future for indigenous children's drama. Furthermore, those excited by prospects for democracy can indeed think of some engaging metaphors – consider the vibrancy of the Athenian public sphere or, in today's version, of the blogosphere. Here, surely, was an opportunity for scholars of the public sphere, of citizen activism and participatory democracy to advise the media regulator. But there were only 25 responses (few compared with many Ofcom consultations), of which eight were from individuals (one or two of whom self-described as campaigners), four from industry, four from groups advocating local or community television, two (or three – classifying such organisations is not always straightforward) from civil society groups specialising in media matters, two from academics (including the first author of this chapter, though some of the civil society responses were written by academics), and one each from Ofcom's Consumer Panel, the British Humanist Association, the Communication Workers' Union, a Councillor and Friends of the Lake District (concerned with the environmental impact of ill-regulated cables and overhead wires).

There is no space here to detail the nature of these responses, though we draw on some of them below in concluding this section. Beyond the obvious paucity of academic input, it is also noteworthy that several of the responses – particularly those from industry and from individuals - offered little or no comment on the 'citizen interest' at all, instead treating the consultation as an occasion to advance their own agendas (silent calls, complaints about telephone number systems, broadcast transmission, etc). Intriguingly, the Broadband Stakeholders Group advocated citizen over consumer interests since the latter generate bureaucratic regulations on industry (designed to protect individuals) whereas the public interest in the long term, they implied, is best served by encouraging (i.e. deregulating for) investment and innovation. British Telecommunications plc focused on the citizen interest in establishing a universal service obligation for broadband – one would not disagree, but again self-interest dictates the plea, in bold and italics, that in future 'BT and its customers are not constrained in improving its services by more regulation'. Several months after the consultation closed, little had resulted, although Ofcom's website promises for all consultations that 'The team in charge of the consultation will review all the responses we have received. They will then prepare a summary for our Board or another group responsible for making the relevant decision. We usually aim to produce this summary within 2 weeks of the consultation closing.' In the present case, therefore, it appears that Ofcom has little interest in this consultation, consistent with its tendency to prioritise consumer issues over citizenship issues.

More importantly, the challenge remains of defining citizenship interests and articulating an appropriate regulatory policy for furthering these interests as well as addressing the relative lack of public engagement in debates over regulatory policy. Our second case study, by contrast, examines a rather more successful area of policy, one where definitions abound and research is expanding exponentially. Nonetheless, viewed critically, this apparent success may offer little more to the fundamental cause of advancing audiences' interests.

Audiences as empowered or vulnerable? The media literacy debate
In the UK, the media and communication regulator, Ofcom, broke new ground when it gained, unwillingly, the legal duty to 'promote media literacy' in the Communications Act 2003. Since media literacy was not defined in the Act, an early task was that of definitions. Doubtless many advised at this point; and one of the present authors made an early decision, political as well as intellectual, to advocate a simple but broad definition to Ofcom (Livingstone, 2003), following this up by attending meetings, events and responding to public consultations instigated by the regulator (and, subsequently, by the European Commission). The definition offered was that framed by the National Leadership Conference on Media Literacy a decade earlier (Aufderheide, 1993) and widely adopted since – the ability 'to access, analyse, evaluate and communicate messages in a variety of forms'. This appeared effective, for in first consultation on the subject, Ofcom's 'Strategy and priorities for the promotion of media literacy' (p.4) stated:

> 'So media literacy is a range of skills including the ability to access, analyse, evaluate and produce communications in a variety of forms. Or put simply, the ability to operate the technology to find what you are looking for, to understand that material, to have an opinion about it and where necessary to respond to it. With these skills people will be able to exercise greater choice and be able better to protect themselves and their families from harmful or offensive materials.'

There are several interesting points about this statement. First, a simple definition (the first sentence) is framed as too complex and, thus, further simplified in the second sentence, hailing the common sense of the reader ('you') to dispel possible criticism. Second, this restatement significantly waters down the breadth of the first (and of the original): ability has become 'a range of skills' (a translation that enables quantitative evaluation of policy effectiveness), 'communicate messages' has become 'produce communications' (arguably a shift from the interactive process of communication to the one-way process of sending messages 'out there'), access (which many now conceive in terms of navigational and interpretative competences) has become 'operate the technology', communicating back to others is qualified as 'where necessary'. And third, the overall purposes of media literacy are radically scaled back (in the third sentence) to centre on consumer choice and protection from harm.

Ofcom's work on media literacy has been shaped by its operating principles as a regulator which include the need to consult, the statutory requirement to appoint consumer representatives to the consumer panel, to promote and conduct research into public attitudes and to promote public debate on communications issues. Consequently, over the past five years, Ofcom has provided a forum for researchers

across the academy, industry and third sector to debate media literacy issues, and has conducted a substantial body of new and valuable empirical research. However, it pays more attention to the access and use elements of its definition than to either evaluation or creation, and tends to frame media literacy as a matter of overcoming individual barriers to access or choice in the media environment rather than enhancing individual and collective opportunities to use diverse media platforms for creation, participation or critical evaluation. This is, no doubt, consistent with expectations to be held of a largely economic regulator. So too is its evident preference for easily quantifiable measures of media literacy (for example, can people activate the interactive button on the remote control; can they check the recency of a website; do they know who to complain to if content offends them) over more ambitious conceptions of media literacy (for example, does the use of digital media mean that more people are scrutinising government, that global misunderstandings are being renegotiated or that marginalised identities can now be expressed and valorised).

Since governments and regulators in other countries are observing Ofcom's forays into this field rather carefully, apparently no longer content to leave media literacy to their ministries of education, a critical gaze at Ofcom's practice – especially its potential subordination of emancipatory to protectionist and, apparently, deregulatory objectives - is merited. It appears that the British debate has influenced the European one closely following on its heels. In the key legal framework in this sector, the European Commission's Audiovisual Media Services Directive (AVMS, approved by the EC in November 2007 as a revision of the Television Without Frontiers Directive), media literacy is defined in strikingly similar terms to those of Ofcom above:

> 'Media literacy refers to skills, knowledge and understanding that allow consumers to use media effectively and safely. Media-literate people will be able to exercise informed choices, understand the nature of content and services and take advantage of the full range of opportunities offered by new communications technologies. They will be better able to protect themselves and their families from harmful or offensive material.'

In this definition, critics will note, media literacy is wholly individualised, prioritising consumers and consumer choice over citizens and citizens' rights, and prioritising protection over participation. Similarly, the European Commission's definition of media literacy repeats that of Ofcom (and of the National Leadership Conference) except that it omits the crucial element of 'creating' messages and it downplays communication to a personal rather than, say, a civic matter. Thus it defines media literacy as:

> 'the ability to access, analyse and evaluate the power of images, sounds and messages which we are now being confronted with on a daily basis and are an important part of our contemporary culture, as well as to communicate competently in media available on a personal basis. Media literacy relates to all media, including television and film, radio and recorded music, print media, the Internet and other new digital communication technologies.'

Yet content creation and interactive communication are not optional extras - in a digital world, these are central to informed opinion, freedom of expression and the

democratic right to participate and be heard. Just as writing was more contested and regulated than was reading in the nineteenth century, it seems that creating will be more contested compared with receiving content in the twenty-first century. Shouldn't more of the audience researchers currently fascinated by technological affordances that enable people not only to be active but also interactive, writing and rewriting texts via fanzines, blogs, editing software, digital storytelling and so forth now be defending these activities as rights that require some complex societal support beyond the capacity of individuals to provide – from copyright freedoms to editing expertise?

Against this background, alternative definitions of literacy are struggling to be heard. Notably, the European Charter for Media Literacy has been significantly informed by academics and media reform advocates. It identifies seven competences for media literate people, including all four elements of 'access', 'analyse', 'evaluate' and 'create', and it emphasises social as well as individual benefits and civic as well as expressive dimensions of 'creation', while also encompassing the exercise of informed cultural choice and the avoidance of harm (Bachmair & Bazalgette, 2007). A similar balance between emancipation and protection is evident in statements on media literacy from the Council of Europe and UNESCO. This latter states:

> "Empowerment of people through information and media literacy is an important prerequisite for fostering equitable access to information and knowledge, and building inclusive knowledge societies. Information and media literacy enables people to interpret and make informed judgments as users of information and media, as well as to become skillful creators and producers of information and media messages in their own right."

Since these bodies concur in their ambitious definitions – stressing equity, inclusiveness, participation and critique at a societal as well as individual level, and the requirements on institutional providers and state actors as well as skilled individuals - it is all the more striking that the European Commission apparently does not. It is hard to escape the conclusion that while emancipation is a popular rhetoric, the hidden agenda of media literacy policy is, more simply, minimising individual risks and maximising consumer skills so as to legitimate industry deregulation. Consider this statement by the UK's then Minister of State for Culture, Media and Sport, Tessa Jowell: 'if people can take greater personal responsibility for what they watch and listen to, that will in itself lessen the need for regulatory intervention' (*The Daily Mail*, 21/1/2004, p. 23). Robin Foster, Ofcom's Partner for Strategy and Market Developments in 2005, put it similarly when he said, 'We will have to learn to rely more on markets than ever before. And we need to rely more on individual consumers and on companies exercising responsibility in those markets, with increasing emphasis on self-regulation and co-regulation' (quoted in Livingstone, Lunt, & Miller, 2007-b). Or, last, note Ofcom's statement to the European Commission consultation on media literacy in 2006, that 'media literacy is increasingly becoming a fundamental component of European and national regulatory policy agendas in the communications sector, especially as developments in the creation and distribution of content challenge current approaches to regulation in this area'. Media literacy, one may conclude, is being co-opted by a neoliberal politics for reasons quite distinct from those for which academics and educators have long advocated it.

In short, it can be argued that media literacy is prominent on the policy agenda because increasing consumer knowledge and awareness is held to advance the goal of economic competition by legitimating the reduction of top-down regulatory intervention in a converging and globalising media market while simultaneously sustaining a promise (rarely evaluated in terms of outcomes) of 'empowerment' to the public. In Isaiah Berlin's terms, regulating for negative freedoms (most notably, reducing restrictions on industry and increasing choice for consumers) seems more favoured by governments than regulating for positive freedoms, such as ensuring a democratically engaged polity. If this argument is accepted, it becomes less surprising that media literacy is prominent on the policy agenda of Western governments. As the EC's Information Society and Media Commissioner, Viviane Reding, said in a 2007 speech, 'Everyone (old and young) needs to get to grips with the new digital world in which we live. For this, continuous information and education is more important than regulation'.

A newly responsible, self-regulating audience is, it appears, being called for in these proclamations (Ouellette & Hay, 2008), a key new player (albeit more spoken for than heard) in the emerging multistakeholder regime regulating twenty-first century European media and communication policy. This implied audience provides a vital component in efforts to reduce state regulation and increase industry self-regulation (e.g. through the promotion of codes of conduct, editorial principles, technical solutions for the user, access controls, notice and take down procedures and so on). As we noted in the first case study, again the costs for the individual in this regime shift are little articulated, although Ofcom's 2006 EC consultation response (p.4) does acknowledge that, 'these schemes rely for their effectiveness on consumers actively taking measures to protect themselves and their families.' But if they do not – if people do not become dutiful and sensible consumers (and audience researchers surely know that people are diverse, sometimes resistant and, most important, motivated by life-course goals and everyday contingencies more than government agendas) – it is unclear who bears the responsibility for any adverse consequences. It seems likely, from previous research on knowledge gaps, the digital divide and cycles of disadvantage, that the burden of risk will fall most heavily on those least able to bear it.

Public policy struggles face two tasks: one is to effect change for the better, the other – King Canute-like – is to hold back change for the worse. If, for the moment, one defines 'better' and 'worse' as perceived by actors themselves, one might conclude that, thus far, the emancipatory approach to media literacy has achieved moderate success in defining and extending policy definitions of media literacy and in critiquing, if not holding back, some of the most reductionist approaches. But it has had little practical impact so far in mobilising new initiatives or effective programmes of implementation that go beyond the commerce-led aims of media literacy as either protection (which thereby also, often inadvertently, clears the way for further market deregulation) or empowerment defined minimally as acquiring the skill set expected of modern consumers. The protectionist approach has done better – parents and teachers are now largely aware of online risks, many consumers use technical tools to control their access to potentially harmful or offensive contents, signposting commercial and offensive content is at least on the industry's agenda, self-regulatory content codes are being agreed, and efforts are underway to extend digital literacy to the young, the poor and the elderly.

But it must be said that little headway has been made in advancing a conception of media literacy, long advocated by critical audience scholars, that, on the one hand, draws on existing knowledge of audiences as – if and when conditions are right - creative, critical, social, civic, ludic, imaginative and, on the other hand, characterises media literacy in terms of some ambitious purposes for our highly mediated society. These purposes may be stated in summary as, first, enabling equality of opportunity in the knowledge society, which requires overcoming digital inequality and exclusion; second, active and informed participation in a revitalised democracy which requires critical engagement with the mediated public sphere; and third, self-actualisation for individuals and communities, achieved through enabling the lifelong learning, cultural expression and personal fulfilment that is everyone's right in a civilised society. What such ambitions would require for their realisation, in relation to media literacy specifically and the digital media landscape more generally is, we suggest, a question that should be of concern to audience researchers (among others) everywhere.

Re-imagining the audience – in whose interest?
In this chapter, we have written as audience researchers more than as policy experts, but as audience researchers whose sensibilities have recently been exercised by 'the audience' as imagined, usually implicitly but still influentially, by policy-makers and policy advisors spanning academia, regulators, commerce, civil society and the state. We have found it problematic that, when policy debates draw on audience research, it tends to be that produced by market or social organisations (think tanks, regulators and the like) rather than critical academic research. It is also problematic that, despite the mantra of evidence-based policy, much policy deliberation – including within the academy - does not see beyond, or question, the implied audience, often because its focus is on the regulation of *provision* (a top-down perspective) rather than on regulating the *mediation* of social relations - both hierarchical and heterarchical, including individual/state, market/state, community, local/global. We agree with Raboy, Abramson, Proulx and Welters (2001: 97) that "at the intersection of policy studies and audience studies lie different approaches to a common problem" – the former taking a normative and the latter a descriptive approach to the relation between media and audiences or publics. Yet the normative rests, implicitly if not explicitly, on descriptive accounts of this relation, just as normative ideals may underpin the critical framing of empirical audience research.

Making the implied audience in policy deliberations visible is, therefore, a critical task for audience researchers. What does, and should, policy expect of audiences? Are they reductively conceived as mere receivers of provision, benevolent or otherwise? Have they responsibilities? Or skills? Is regulation influenced by or even undermined by critical audiences? If they exit without voice, where does that leave provision claimed to be 'in the public interest'? Does policy permit them the opportunity to adjudicate on whether their rights (cultural recognition, freedom of expression, freedom from harm, plurality of views, privacy, freedom from commercial exploitation) are being met? If they can participate, is this as members of civil society or, more minimally, as complaining consumers? Are they addressed as an aggregate or a collective, as a national or global, local or fragmented body, as mere receivers or as also creators of content? As we see it, much media policy scholarship has not yet grasped the import of critical audience studies, in which each of these activities on the

part of audiences – and their implications for power, agency and subjectivity - has been thoughtfully explored.

Furthermore, audience researchers themselves may engage in policy debates through diverse routes – working as consultants or in collaboration with policy makers, as members of civil society organisations who may contest regulators' claims to represent audiences' interests, as producers of independent studies of audiences which may challenge the knowledge claims of regulators, as contributors to public consultations and other deliberative processes, and as critical commentators working within the academy itself. However, this diversity of forms of engagement is perhaps not matched by academics' actual level of engagement.

One must also consider critically when and why opportunities to engage arise. The evident crisis in citizenship participation, trust and authority is one reason. Another appears to be because the neoliberal agenda demands new individualised approaches to governance and risk management that, more than ever, have direct implications for, and rely on empirical work with, audiences themselves. For example, in rethinking how to fund public service broadcasting in an age of digital convergence, policy makers prefer to rest their judgements on what audiences appear to want (and what industry is prepared to pay for) rather than on what society may have a right to expect. To take another example, in determining policy for content regulation on the internet, policy makers seek to gauge parents' competence in guiding their children or to evaluate the effectiveness of technical tools for child protection rather than to build consensus regarding 'community standards' or work to negotiate legal, moral or cultural norms. Last, one must be sceptical about the chances of being listened to as an academic researcher. In multistakeholder deliberations, academics are merely one voice amongst many: they are not necessarily much valued or understood, may come too late, and tend to disagree among each other. Most problematically, opportunities for engagement and consultation create the danger of capture, whether inadvertently or complicitly. While acknowledging these very real hazards, we conclude by asking what could and should be the contribution of academics, especially of critical audience researchers, to policy deliberations?

First, in working with audiences, researchers should listen carefully to their concerns, hopes and criticisms so as effectively to ground recommendations to policy makers and broadcasters. Of course we already listen to them carefully, and unlike market researchers, academic researchers seek to draw them out sensitively: we interpret their silences, we do not take their utterances necessarily at face value and we contextualise what they say. But do we make this research count? To be sure, engaging in policy deliberation is time-consuming and usually frustrating. But to research audiences' concerns, hopes and criticisms without acting on the knowledge we produce is hard to defend; and as many of us know, our interviewees often expect that those in power will learn of our findings and that improvements will follow. For example, critical social science would critique the technological determinism implicit in much policy (to illustrate, Ofcom's consultations treat technology as a given, merely asking, for example, how the mobile phone or video-on-demand or the internet can further benefit consumers). But it takes work to develop a non-determinist alternative, to show how people's life contexts, social trajectories, civic aspirations or material disadvantages lead them to use, or need, or hope for, media and technologies that may or may not or should be on offer; and it takes work to identify how one might measure

progress or failure in meeting what Ofcom, as we saw earlier, terms 'broader social, cultural, [political and] economic objectives'.

Second, we suggest that audience researchers should draw on democratic theory to contest the consumer focus of media and communication regulation by articulating the public or citizen interest, analysing this in terms of social, cultural, political and economic spheres, and conducting an independent assessment of the extent to which current policies meet these interests. To take the case of the political sphere (the sphere Ofcom seems least keen to include), it would surely be uncontentious to propose that furthering the citizen interest should include

- increasing the diversity of voices in the news (not simply more news organisations repeating the same headlines; Mansell, 2007);
- 'facilitating civic understanding and fair and well-informed debate on news and current affairs' (as mandated in sn 264(6)(c) and (l) of the Communications Act but not as measured in simple charts of news viewing or reported satisfaction with output); and
- delivering the community media that provide 'an important means of empowering citizens and encouraging them to become actively involved in civic society, (...for) they enrich social debate, representing a means of internal pluralism (of ideas), (...and provide) an effective means to strengthen cultural and linguistic diversity, social inclusion and local identity' (The European Parliament, 2008).

Academics might develop and strengthen such a list, noting also that in societies characterised by individualisation, distrust and disillusion, the media surely remain a significant shared resource for citizens.

Third, academics could more often advocate alternative conceptions of the means of achieving the public interest in communications; for example by supporting those who argue for communication rights. Hamelink (2003: 1) collects under the heading of 'communication rights' or 'communication entitlements' those rights recognised by the UN's Universal Declaration of Human Rights that relate to information and communication, arguing that:

> 'Communication is a fundamental social process and the foundation of all social organization… Communication rights are based on a vision of the free flow of information and ideas which is interactive, egalitarian and non-discriminatory and driven by human needs, rather than commercial or political interests. These rights represent people's claim to freedom, inclusiveness, diversity and participation in the communication process.'

Is this an agenda that critical audience researchers could sign up to as, in one form or another, have communication activists (Padovani and Pavan, in press), political economists (Garnham, 1999), and some cultural scholars (e.g. Couldry, 2007)? If so, some policy engagement is again required, for the latest WSIS discussions failed to support the right to communicate (Hamelink & Hoffmann, 2008; Hintz, 2007).

At the outset, we advocated the twin strategy of, first, identifying in order to critique the implied audience of communications policy-making and, second, drawing on the insights of critical audience studies so as to engage with that policy making better to

meet the interests of audiences, especially the interests – even the rights – of audiences as citizens. Identifying the implied audience has involved considerable attention to semantics – definitions of citizens and consumers, definitions of media literacy. The same would apply for other cases also (consider, for example, the 'public' of public service broadcasting or the 'community' of community radio) (see Lunt and Livingstone, in press). We hope to have convinced that while the implied audience is constructed discursively, it is simultaneously (and consequentially) materially embodied in legal/regulatory principles and in institutional practice. Claims about 'the audience' shift as political economy and cultural climates shift, enabling different constituencies to argue their case and so advance their interests. Alternative terms used to refer to the audience seem to pinpoint these discursive shifts – Syvertsen (2004) debates citizens, audiences, customers and players; Webster and Phalen debate audiences as victims, consumers and commodities; Dayan, Mehl, Madianou and others have contrasted audiences, publics and users (in Livingstone, 2005) and, increasingly to the fore, many are debating audiences as citizens, consumers or citizen-consumers (Clarke, Newman, & Smith, 2007). Such terminological choices inflect audiences differently, invoking characteristics of active or passive, attentive or inattentive, mass or fragmented, discerning or mindless, demanding or accepting, sophisticated or vulnerable. This is not, we have argued, merely a matter of semantics, for the implied audience plays a significant role in public deliberations over policy, co-opting evidence or, more often, common sense in subtly legitimating one position or another.

As for the second element of our strategy, it must be acknowledged that this is more contentious than the first, for it requires researchers to enter the policy fray directly, putting their independence, itself their legitimation to speak as 'experts' in multi-stakeholder deliberations, in jeopardy. However, we are writing in the wider context of what we see to be a normative turn across the social sciences – a renewed concern to make research count and to bring critical voices into the sites of decision making. Leaving behind the clarity of Lazarsfeld's (1941) founding distinction between administrative and critical schools of communication is undoubtedly a hazardous undertaking. Carey (1978/2003: 440) fears the 'silent embrace' between academic and policy makers, as illustrated in Rowland's (1983) classic critique of media effects research. But the prospects for staking a claim for inclusiveness, diversity, quality, participation and recognition of the other increasingly seem too important to turn one's back on. As Cunningham (2003: 19) says, in advocating a shift in cultural critique from the often idealistic rhetorics of resistance, anti-commercialism and populism and towards the more pragmatic demands of access, equity, empowerment and opportunity:

> 'Replacing shop-worn revolutionary rhetoric with the new command metaphor of citizenship commits cultural studies to a reformist strategy within the terms of a social democratic politics, and thus can connect it more organically to the well-springs of engagement with policy.'

McGuigan (2003: 28) concurs, aiming to leave behind the problematic 'gulf between the political pretensions of cultural studies and its practical effects' and instead exploring the potential for a post-Marshall notion of cultural citizenship and cultural entitlement as the principal goal of (critical) cultural policy – an ambition central to the discussion of the citizen interest in communication.

We need not express a particular view on these or other issues in order to make three final arguments: first, that audience studies has the expertise to contribute in the audiences' interest in these deliberations (including expertise in ways of enabling audiences to speak for themselves); second, that critical scholarship must always ask in whose interest the various decisions are (including asking how the burden of risk may fall if things go wrong, as they will); and third, that the very independence of the academy means that we have insights, findings and critical perspectives that surely should contribute to shaping the key policy decisions to be made regarding the future of media and communications.

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