

## Ofcom's plans to promote 'participation', but whose and in what?



*The consultation on Ofcom's Draft Annual Plan 2013/14 ended on Friday 22 February. LSE's **Sonia Livingstone** and **Peter Lunt** of the University of Leicester point out that despite a stated focus on "participation" and the "citizen interest" the plan needs much more clarity and specifics on these two priorities.*

Ofcom's draft **Annual Plan 2013/14** contains a welcome emphasis on promoting "participation" in a wide range of communication services, and finally offers a wider strategy in relation to citizens. As we **have pointed out previously**, Ofcom wrestles with **both the citizen and the consumer** in each of us. Despite the references to participation and a wider strategy, it seems that in the priorities and work plan Ofcom proposes for 2013/14 the citizen interest is still left behind.

### ***Ofcom's proposed priorities for 2013/14***

Page 3 of the consultation document notes: 'the communications sector enables participation and social cohesion in UK society'. This is an important statement. However, we cannot find any further discussion or amplification of this statement. Particularly missing is a vision of the kinds of participation or social cohesion that communications could or should enable in UK society. It is, in consequence, difficult to see how Ofcom conceives of this priority, either as a measure of success in relation to promoting the opportunity to participate or as a key plank of the claimed wider strategy in relation to citizens.

Instead, the draft annual plan consistently refers to participation as something that can be taken as given, without elaborating exactly what is being participated in. What opportunities to participate does Ofcom intend to promote? As it emerges in relation to proposed work areas, what is intended is deeply disappointing – though of course important – namely that all UK households should be reached by the postal service and superfast broadband. Good, but to what end? If this new language of participation and citizenship to be more than just rhetorical, it should be developed into a genuine strategy in relation to citizens. This would include: a citizen and societal needs analysis, an account of relevant partner institutions or sectors, a specification of feasible goals in relation to participation and citizenship, and a careful analysis of citizen detriment should these goals not be met.

The draft annual plan conflates media use with use of media to participate in society (measuring use against market offer rather than citizen needs, which are entirely unspecified). It conflates individual consumer adoption of media devices with opportunities to participate for purposes of social cohesion (as above) or for any other societal benefit. It ignores the interactive element in 'participation' that differentiates it from use – you can use something alone but you cannot participate in something all by yourself, by any definition – so who are the others, institutional, community or individual with whom citizens could beneficially communicate? Do communication technologies permit the effective building of online communities, alliances, deliberative spaces, public opinion, learning spaces etc.? If not, who is losing out? To put the question another way, we might ask, of all the ways that people use media and communications, which uses does Ofcom consider particularly contribute to the citizen interest? Having answered that question, Ofcom should focus resources on tracking and promoting these. So vaguely stated, and with no social or citizen goals or benefits specified or measurable, the draft plan leaves open the absurd possibility that if the British public all bought iPads and used them for shopping, then the citizen interest would be met.



Many have pointed Ofcom to sources of thinking on the **citizen interest** over the years. Suffice it to say here, in basic terms, that the consumer interest tends to prioritise the short term over the long term and the individual's private self-interest over the wider public good. It is the longer-term public good that should be emphasised and articulated in a wide strategy for citizen opportunities to participate in UK society. In taking this forward, a speech delivered a decade ago by the current CEO remains helpful (Ed Richards, Speech to the Westminster Media Forum, 25 May 2004, *Ofcom Review of Public Service Broadcasting*.) In that speech he mapped the distinction as follows:

#### Consumer rationale

Wants  
Individual level  
Private benefits  
Language of choice  
Short-term focus  
Regulate against detriment  
Plan to roll back regulation

#### Citizen rationale

Needs  
Social level  
Public/social benefits  
Language of rights (inclusion)  
Long-term focus  
Regulate for public interest  
Continued regulation to correct market failure

Is this recognition of the importance of citizen needs, conceived at a social level, for public benefit, with a long-term focus and emphasis on rights still central to Ofcom's actions? There is little of it in the draft plan. To be sure, in many ways, Ofcom has and proposes to continue contributing very significantly to the citizen interest in communication matters. What a wider strategy in relation to citizens had seemed to promise, but is strikingly unelaborated in the draft plan (compare the many pages devoted to specifying the changing technological infrastructure), is a broader vision of the social infrastructure on which citizen participation fundamentally depends in a technologically networked society. Why does it still appear that Ofcom puts the citizen interest structurally behind that of the consumer interest (waiting for market failure, trying not to regulate, conceiving only of 'interventions' as a possible means of furthering the citizen interest)?

### ***Ofcom's proposed work areas for 2013/14***

The two work areas associated with "opportunities to participate" are necessary but insufficient. Postal and broadband services are vital for all citizens. But they are only of value if, in practice, they do genuinely "enable participation and social cohesion in UK society." Ofcom must develop work areas to evaluate and promote these larger citizen goals, going beyond the mere measurement of amount of use, so as to track improvements (if there are such) in participation in society through the use of communication tools, to pinpoint who is excluded from such benefits (both as individuals and groups), and to promote these, together with appropriate partners, for the public good and the longer-term benefit of society. Once upon a time there was a plan to develop a citizens' interest toolkit to match that of the consumer toolkit developed originally by the Consumer Panel – this remains a good idea, so we propose its inclusion in the annual plan.

Where Ofcom has made modest forays into questions of participation – in the media literacy audit, for instance, there are sporadic questions on use of technologies to enter debate or express an opinion or gain (and critique) information – these have remained undeveloped and, most importantly, they **show no increase** in the UK public over the years since Ofcom's inception. If Ofcom seriously intends to promote opportunities to participate, the fact that this has proved difficult so far should be of concern. The importance of media literacy is mentioned briefly on p.18, where Ofcom proposes to continue "providing information and evidence in support of wider public policy development on issues such as inclusion and media literacy." It is not stated what public policy developments are referred to here, and we consider it important that these are specified. In our view, few now exist, and this constitutes something of a crisis in advancing media literacy in this country, particularly in relation to participatory, civic and critical literacies so vital to the citizen interest and so necessary if citizen detriment is to be avoided.

There are many organisations in the UK that are working to improve citizens' participation in civic and political matters (consider the Hansard Society's **annual audit of political engagement**, for

instance, which for some years has examined the use of media technologies as a possible enabler of engagement). Others are working to use media and communication technologies to enhance social cohesion, informal and lifelong learning, digital literacies and skills, creative innovation in diverse areas of enterprise, social inclusion, and much more. We urge that Ofcom build strategic alliances with organisations expert and experienced in matters of participation and citizenship in order to bring its specific expertise on media and communications technologies and uses to bear in spheres where wider benefits may be promoted. At present, no partnerships or collaborations with any citizen groups or public bodies or community organisations are mentioned as part of the wider strategy on citizens' interests – with whom will Ofcom work in advancing this? Is Ofcom confident that it has identified a sufficiently diverse, representative and effective set of partners for such work? The public should be told who they are.

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February 27th, 2013 | [Digital Inclusion](#), [Guest Blog](#), [Media Literacy](#) | [0 Comments](#)

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