

## 2. Committee of Ministers' recommendations

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**B**elow are presented the most relevant recommendations of the Committee of Ministers of the Council of Europe in a summarised form and in chronological order.

### **Recommendation R(96)10 on the guarantee of the independence of public service broadcasting**

Recommendation R(96)10 includes a framework for the management and supervision of public service broadcasting<sup>5</sup> (PSB, now PSM<sup>6</sup>). It makes a clear distinction between PSM's management on the one hand and supervisory bodies on the other, including their respective statuses, competences, and responsibilities. The competences of both should be clearly defined within the national legal frameworks governing PSM. According to the Recommendation, the management is responsible for the day-to-day operation of their organisation, the supervisory board, on the other hand, should not exercise any *a priori* control over programming.<sup>7</sup> Both the management and the supervisory body should have rules defining the appointments, to avoid placing either of them at risk of political or other interference, among others. There should be very limited possibility of early removal or suspension, but also clear provisions on the conflict of interests. Finally, the responsibility of the managerial level for the exercise of their functions as members of their PSM organisation is to the supervisory level.

The Recommendation provides a list of safeguards to prevent political or other interference with PSM's supervisory bodies. They should, among others, guarantee that the members of supervisory bodies:

- ▶ are appointed in an open and pluralistic manner;
- ▶ represent collectively the interests of society in general;
- ▶ may not receive any mandate or take any instructions from any person or body other than the one which appointed them, subject to any contrary provisions prescribed by law in exceptional cases;

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5. Recommendation no. R(96)10 of the Committee of Ministers to member states on the guarantee of the independence of public service broadcasting. <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=090000168050c770>

6. The change in terminology reflects the process of transformation into multimedia environment characterised by globalisation, convergence and digitalisation, accompanied by new tasks and opportunities for PSM.

7. Later on, in the Recommendation Rec(2000)23, the Committee of Ministers noted that also regulatory authorities can assume the tasks usually incumbent on specific supervisory bodies of the PSM.

- ▶ may not be dismissed, suspended or replaced during their term of office by any person or body other than the one which appointed them, except where the supervisory body has duly certified that they are incapable of or have been prevented from exercising their functions;
- ▶ may not, directly or indirectly, exercise functions, receive payment or hold interests in enterprises or other organisations in media or media-related sectors where this would lead to a conflict of interest with their functions within the supervisory body.

Rules on the payment of members of the supervisory bodies of PSM organisations should be defined in a clear and open manner by the texts governing these bodies.

### **Recommendation R(99)1 on measures to promote media pluralism**

The Recommendation R(99)1 recognises the significance of PSM in safeguarding media pluralism<sup>8</sup>. The recommendations range from the very need to preserve and develop PSM, taking into account technological developments, to establishing a dialogue with the public and ensuring adequate funding, which can include both public resources and commercial revenues, as follows:

- ▶ Member States should maintain PSM and allow it to develop in order to make use of the possibilities offered by the new communication technologies and services.
- ▶ Member States should examine ways of developing forms of consultation of the public by PSM organisations, which may include the creation of advisory programme committees, so as to reflect in their programming policy the needs and requirements of the different groups in society.
- ▶ Member States should define ways of ensuring appropriate and secure funding of PSM, which may include public funding and commercial revenues.

### **Recommendation CM/Rec(2007)2 on media pluralism and diversity of media content**

Recommendation CM/Rec(2007)2<sup>9</sup> recognises the importance of PSM as one of the key contributors to pluralism, diversity, social cohesion and a space for dialogue, and it endorses the development of new interactive services as a part of PSM. The interaction of PSM with the public, safeguards of PSM's editorial independence, established in cooperation with civil society, as well as stable funding, are also called for:

8. Recommendation No. R(99)1 of the Committee of Ministers to member states on measures to promote media pluralism. [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectId=09000016804fa377](https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=09000016804fa377)

9. Recommendation CM/Rec(2007)2 of the Committee of Ministers to member states on media pluralism and diversity of media content, § 4. [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectId=09000016805d6be3](https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=09000016805d6be3)

- ▶ Member states should ensure that existing PSM organisations occupy a visible place in the new media landscape. They should allow PSM to develop in order to make their content accessible on a variety of platforms, notably in order to ensure the provision of high-quality and innovative content in the digital environment and to develop a whole range of new services including interactive facilities.<sup>10</sup>
- ▶ Member states should encourage PSM to play an active role in promoting social cohesion and integrating all communities, social groups and generations, including minority groups, young people, the elderly, underprivileged and disadvantaged social categories, disabled persons, etc., while respecting their different identities and needs. In this context, attention should be paid to the content created by and for such groups, and to their access to, and presence and portrayal in, PSM. Due attention should also be paid to gender equality issues.<sup>11</sup>
- ▶ Member states should invite PSM organisations to envisage the introduction of forms of consultation with the public, which may include the creation of advisory structures, where appropriate reflecting the public in its diversity, so as to reflect in their programming policy the wishes and requirements of the public.<sup>12</sup>
- ▶ Member states should adopt the mechanisms needed to guarantee the independence of PSM organisations vital for the safeguard of their editorial independence and for their protection from control by one or more political or social groups. These mechanisms should be established in co-operation with civil society.<sup>13</sup>
- ▶ Member states should define ways of ensuring appropriate and secure funding of PSM from a variety of sources – which may include licence fees, public funding, commercial revenues and/or individual payment – necessary for the discharge of their democratic, social and cultural functions.<sup>14</sup>

### **Recommendation CM/Rec(2007)3 on the remit of public service media in the information society**

In the same year, the Committee of Ministers further stressed the need to entrust PSM with a remit adapted to technological and socio-cultural changes and to elaborate strategies enabling PSM to preserve their role as a factor for social cohesion and integration of all individuals, as well as a contributor to cultural identities, diversity, and a wider democratic debate, including growing participation of the public.<sup>15</sup> The

10. Ibid, § 3.1

11. Ibid, § 3.2

12. Ibid, § 3.3

13. Ibid, § 3.4

14. Ibid, § 3.5

15. Recommendation CM/Rec(2007)3 of the Committee of Ministers to member states on the remit of public service media in the information society. [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectId=09000016805d6bc5](https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=09000016805d6bc5)

text recognises that the contemporary information society relies heavily on digital technologies and that the means of content distribution have diversified beyond traditional broadcasting. It therefore calls on States to ensure that the PSM remit is extended to cover provision of appropriate content also via new communication platforms.

The public service remit should adapt to the information society to become:

- ▶ a reference point for all members of the public, with universal access offered;
- ▶ a factor for social cohesion and integration of all individuals, groups, and communities;
- ▶ a source of impartial and independent information and comment, and of innovatory and varied content which complies with high ethical and quality standards;
- ▶ a forum for public discussion and a means of promoting broader democratic participation of individuals;
- ▶ an active contributor to audio-visual creation and production and a greater appreciation and dissemination of the diversity of national and European cultural heritage.<sup>16</sup>

The Recommendation calls on member states to ensure that the specific legal, technical, financial and organisational conditions required for the PSM to continue their service are fulfilled and adapted to the new digital environment.<sup>17</sup>

Two key recommendations stressing the PSM's role in the digital environment read as follows:

- ▶ Member states have the competence to define and assign a public service remit to one or more specific media organisations, in the public and/or private sector, maintaining the key elements underpinning the traditional public service remit, while adjusting it to new circumstances. This remit should be performed with the use of state-of-the-art technology appropriate for the purpose.<sup>18</sup>
- ▶ Member states should ensure that the specific legal, technical, financial and organisational conditions required to fulfil the public service remit continue to apply in, and are adapted to, the new digital environment. Taking into account the challenges of the information society, member states should be free to organise their own national systems of public service media, suited to the rapidly changing technological and social realities, while at the same time remaining faithful to the fundamental principles of public service.<sup>19</sup>

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16. Ibid, § 1

17. Ibid, § 25

18. Ibid, § 1

19. Ibid, § 25

## **Recommendation CM/Rec(2012)1 on public service media governance**

The Committee of Ministers' Recommendation (2012)<sup>20</sup> lays down a number of guiding principles related to PSM independence, accountability, effective management, responsiveness and responsibility, transparency and openness. This instrument is thus of particular importance for creating a culture of independence in PSM organisations. Its development was guided by the challenges arising from the PSM transition: (a) from State to public service, and (b) from traditional broadcasting to digital content delivery. These developments required the PSM governance systems to adjust, and accordingly, the objective of the Recommendation was to strengthen and enhance the legal and financial environment, including via external governance arrangements aiming to guarantee editorial and operational independence and sustainable funding.

PSM governance systems should determine how these organisations:

- ▶ define the vision of the organisation and ensure that it is best equipped to fulfil their remit;
- ▶ set and monitor the accomplishment of their objectives;
- ▶ conduct relations with stakeholders and secure their endorsement;
- ▶ protect their independence;
- ▶ ensure that the management priorities are aligned with the organisations' overall purpose;
- ▶ ensure that their decisions are consistent with their remit, are appropriately informed, and fully executed.<sup>21</sup>

To apply the new governance arrangements, the Recommendation introduced a three-tier system of guiding principles:

| <b>1<sup>st</sup><br/>tier</b> | <b>Structure</b>  |   |
|--------------------------------|---|---|
|                                | <b>Independence</b>   | <b>Accountability</b>   |
|                                | <ul style="list-style-type: none"> <li>– No political influence on <b>funding</b></li> <li>– Clear legal / regulatory basis on the <b>scope and remit</b></li> <li>– No political influence on <b>appointments</b></li> </ul> | <p><b>A structure that identifies:</b></p> <ul style="list-style-type: none"> <li>– accountable to <b>whom?</b></li> <li>– accountable for <b>what?</b></li> <li>– <b>how</b> to be held accountable?</li> <li>– <b>when</b> to be held accountable?</li> </ul> |

20. Recommendation CM/Rec(2012)1 of the Committee of Ministers to member states on public service media governance, §§ 1-5. [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectID=09000016805cb4b4](https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016805cb4b4)

21. Ibid, § 15

|                            |  |  |
|----------------------------|--|--|
| <b>2<sup>nd</sup> tier</b> | <b>Management</b>  |  |
|                            | <b>Effective Management</b>  |  |
|                            | <b>A management structure and approach which:</b> <ul style="list-style-type: none"> <li>– are prepared to rethink resource allocation to meet new audience needs</li> <li>– seek and foster new skills in the workforce</li> <li>– have the right senior managerial talent and skills, with diversity and gender-balanced representation</li> </ul> |  |
| <b>3<sup>rd</sup> tier</b> | <b>Culture</b>   |  |
|                            | <b>Responsiveness and responsibility</b>   | <b>Transparency and Openness</b>   |
|                            | <ul style="list-style-type: none"> <li>– Immediate, unmediated and consistent channels of communication with audiences</li> <li>– Active debate with the audience</li> <li>– Integrating and using feedback</li> <li>– Journalistic and general editorial codes</li> </ul>   | <ul style="list-style-type: none"> <li>– Making management information more widely available</li> <li>– Publishing agendas and minutes</li> <li>– Developing partnerships</li> <li>– Taking new opportunities to meet and engage with audiences</li> </ul> |

Source: Recommendation (2012)1 of the Committee of Ministers to member states on public service media governance<sup>22</sup>

Below, the individual principles are described in more detail.

## 1.a) Independence

Securing and safeguarding independence is the primary role of any framework of PSM governance, also at the heart of all of the relevant Council of Europe standards. Independence should be operationalised in terms of PSM regulation, funding and appointments:

### *i. Regulatory and policy framework*

The PSM regulatory and policy framework should be set up to define the scope and reach of the organisation(s) concerned, lay out the principles and policy goals behind the policy intervention, as well as to clarify the responsibilities of the regulator and how the independence of the PSM from the State is guaranteed.<sup>23</sup>

The framework should, regardless of its configuration, be such that:

- ▶ there is explicit recognition of the scope and reach of the PSM remit, and absolute clarity about whose role it is to set it and review it;

22. Ibid, § 17

23. Ibid, §§ 24, 25

- ▶ the policy goals for public intervention are clearly and consistently laid out, including unambiguous support for the principles of freedom of expression and journalistic enquiry;
- ▶ there is clarity about the responsibility of the regulator in relation to the public service media;
- ▶ the regulator is required to operate openly and transparently in respect of regulatory action, and is itself guaranteed independence from the State in its decision-making powers.<sup>24</sup>

## ii. Funding

The requirement for the State to ensure appropriate and secure funding of PSM was already laid down by Committee of Ministers' Recommendation No. R (99)1 on measures to promote media pluralism,<sup>25</sup> however Recommendation CM/Rec(2012)1<sup>26</sup> provides details as to how the funding systems should be designed so as to protect the independence of the PSM, to ensure that no editorial influence is exerted and to avoid the institutional autonomy being threatened:<sup>27</sup>

- ▶ Member States should define ways of ensuring appropriate and secure funding of PSM, which may include public funding and commercial revenues.<sup>28</sup>
- ▶ While it inevitably remains the State's responsibility to set both the method and the level of funding, it is nevertheless imperative that the system should be so designed that:
  - it cannot be used to exert editorial influence or threaten institutional autonomy – either of which would undermine the operational independence of the public service media;
  - the PSM is consulted over the level of funding required to meet their mission and purposes, and their views are taken into account when setting the level of funding;
  - the funding provided is adequate to meet the agreed role and remit of PSM, including offering sufficient security for the future as to allow reasonable future planning;
  - the process for deciding the level of funding should not be able to interfere with PSM's editorial autonomy.<sup>29</sup>

24. Ibid, § 25

25. Recommendation No. R (99)1 of the Committee of Ministers to member states on measures to promote media pluralism. [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectID=09000016804fa377](https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016804fa377)

26. Recommendation CM/Rec(2012)1 of the Committee of Ministers to member states on public service media governance, § 26. [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectID=09000016805cb4b4](https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016805cb4b4)

27. Provisions on funding are to be found also in Recommendation 1878 (2009) Funding of public service broadcasting (PACE), and in Recommendation CM/Rec(2022)11 of the Committee of Ministers to member states on principles for media and communication governance.

28. Recommendation No. R (99)1 of the Committee of Ministers to member states on measures to promote media pluralism. [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectID=09000016804fa377](https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016804fa377)

29. Recommendation CM/Rec(2012)1 of the Committee of Ministers to member states on public service media governance, § 26. [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectID=09000016805cb4b4](https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016805cb4b4)

### **iii. Appointments**

The Recommendation recognises the legitimacy of the State to be involved in the appointment of the highest supervisory or decision-making authority within PSM at executive or editorial management level. Any such appointment procedure should be designed in a way that there are clear criteria for the appointment, so that the appointments cannot be turned into a tool of political or other influence over PSM. Furthermore, the appointments should be limited in terms of the duration and circumstances and considering equal representation of men and women in such bodies.<sup>30</sup>

### **1.b) Accountability**

PSM are ultimately, and fundamentally, accountable to the public.<sup>31</sup> But who exactly is responsible to whom for what, how the accountability is held and when? These are the four main questions to which any PSM framework should provide clear answers. All accountability relations should be clearly established, the organisations identified. PSM organisations should be prepared to give account of themselves to different public organisations, including human rights organisations, minority and ethnic groups, any social demographic groups, unions and other specific interest groups.<sup>32</sup>

The outcomes for which PSM will be held accountable should also be clearly set out, but should include a wider range of responsibilities, including financial efficiency and diligence.<sup>33</sup>

The accountability framework should clearly define the scope of information that the PSM is required to supply and a clear timetable for annual report and other audits.<sup>34</sup>

## **2. Management**

The second tier of the proposed system of governance in Recommendation CM/Rec(2012)1 is effective management. It is not the intent of the instrument to explain how PSM should be managed, but to define the goals that should be met by the management structures in view of the challenges that PSM might face: securing the requisite level of independence from the State, transforming from a broadcasting organisation to a public service media and justifying its position vis-à-vis the commercial media in the market.<sup>35</sup>

It is essential that PSM can feel confident that the management decisions are appropriate. PSM should put in place internal management and resource allocation framework that enables them to innovate in how they allocate resources and meet new audience needs arising from the digitalised and convergent environment. They should also pay close attention to seeking, training and fostering new talent and skills and focus on how best to meet senior management challenges.<sup>36</sup>

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30. Ibid, § 27

31. Ibid, § 28

32. Ibid, § 30

33. Ibid

34. Ibid

35. Ibid, §§ 1-7

36. Ibid, §§ 32-34



### 3. Culture

The PSM governance system, including the legal framework, the protection of the independence, funding, the management and allocation of resources, all of these elements need to be employed by PSM organisations to the benefit of the human aspect, notably to engage with their audience and deal with their staff. The Recommendation identifies four values which, operationalised into PSM interdependent systems and behaviours, define the operational culture of an organisation: transparency, openness, responsiveness and responsibility.<sup>37</sup>

#### **Recommendation CM/Rec(2018)1 on media pluralism and transparency of media ownership**

The conditions for pluralism and democracy have often been addressed by the Committee of Ministers recommendations.<sup>38</sup> Recommendation CM/Rec(2018)1 on media pluralism and transparency of media ownership proposes a further commitment to the guiding principles from previous recommendations and the development of a framework to meet the demands of ongoing technological, financial, regulatory and other changes<sup>39</sup> in the digital communication environment. This is of particular importance as this environment is governed by platforms which provide access to a growing range of information from diverse sources, also such with questionable reliability.<sup>40</sup>

Because of their remit and organisation, PSM are understood as particularly well-suited for addressing the informational needs and interests of various segments of society<sup>41</sup> as one of the possible ways of mitigating the public's relying on online platforms as sources of their information. This is why States should reaffirm the role of PSM as independent organisations in fostering public debate, political pluralism and awareness of diverse opinions.<sup>42</sup>

The key recommendations directly referring to PSM are the following:

- ▶ Independent and sustainable public service and not-for-profit community media can serve as a counterbalance to increased media concentration. By virtue of their remit and organisation, public service media are particularly suited to address the informational needs and interests of all sections of society, as is true of community media in respect of their constituent users. It is of utmost importance that the mandates of public service media include

37. Ibid, §§ 35 - 49

38. E.g., Recommendation No. R(99)1 of the Committee of Ministers to member states on measures to promote media pluralism. [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectId=09000016804fa377](https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=09000016804fa377); Recommendation CM/Rec(2007)2 of the Committee of Ministers to member states on media pluralism and diversity of media content. [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectId=09000016805d6be3](https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=09000016805d6be3)

39. Recommendation CM/Rec(2018)1 of the Committee of Ministers to member states on media pluralism and transparency of media ownership. [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectId=0900001680790e13](https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=0900001680790e13)

40. Ibid, pmbI. § 7, cf. PACE Recommendation 1878 (2009) Funding of public service broadcasting.

41. Ibid, pmbI. § 9

42. Ibid, § 2.8

the responsibility to reflect political pluralism and foster awareness of diverse opinions, notably by providing different groups in society – including cultural, linguistic, ethnic, religious, sexual or other minorities – with an opportunity to receive and impart information, to express themselves and to exchange ideas.<sup>43</sup>

- ▶ States should recognise the crucial role of independent public service media organisations in fostering public debate, political pluralism and awareness of diverse opinions. States should accordingly guarantee adequate conditions for public service media to continue to play this role in the multimedia landscape, including by providing them with appropriate support for innovation and the development of digital strategies and new services.<sup>44</sup>
- ▶ States should also ensure stable, sustainable, transparent and adequate funding for public service media on a multiyear basis in order to guarantee their independence from governmental, political and market pressures and enable them to provide a broad range of pluralistic information and diverse content. This can also help to counterbalance any risks caused by a situation of media concentration. States are moreover urged to address, in line with their positive obligation to guarantee media pluralism, any situations of systemic underfunding of public service media which jeopardise such pluralism.<sup>45</sup>

### **Recommendation CM/Rec(2022)4 on promoting a favourable environment for quality journalism in the digital age**

In the long-awaited recommendation on quality journalism in the digital age,<sup>46</sup> the Committee of Ministers reiterated the role and importance of PSM as a trusted source of information, in promoting diversity and setting quality standards.

The Recommendation recognises the role of PSM in producing quality content, including news and current affairs programming and services specifically targeting children and young people. In this context, PSM are encouraged to promote opportunities for young people's involvement in quality content production and engagement with such content, by using genres, formats and distribution channels that speak to and interest young audience.

The Recommendation calls on States ensure stable and sufficient funding for PSM in order to guarantee their editorial and institutional independence, high standards of professional integrity and their capacity to innovate and to remain universally available, including online. States should enable PSM to properly fulfil their remit and deliver quality journalism. An important highlight in the section on sustainable funding, which details numerous structural and support measures to ensure the (long-term) sustainability of the media sector as a whole, is also that diverting PSM funding schemes for other purposes, such as support measures or schemes aimed at other media sectors, could compromise these aims.

43. Ibid, pmb1. § 9

44. Ibid, § 2.8

45. Ibid, § 2.10

46. Recommendation CM/Rec(2022)4 of the Committee of Ministers to member states on promoting a favourable environment for quality journalism in the digital age [https://search.coe.int/cm/pages/result\\_details.aspx?objectId=0900001680a5ddd0](https://search.coe.int/cm/pages/result_details.aspx?objectId=0900001680a5ddd0)

The key recommendations referring to PSM are the following:

- ▶ [...] it is important to ensure that everyone has access to a diverse range of journalistic content, irrespective of income levels and socio-economic barriers. Public service media and not-for-profit community media must be able to maintain their crucial role in that regard. They should be supported in their progress towards digital transformation, including through adequate means and funding, in order to retain their social value and relevance. Public service media, largely considered as a trusted and reliable source of information, can have a stabilising effect on the media sector, insofar as its independence from political and commercial pressures is ensured.
- ▶ **Public service media:** as noted in numerous recommendations of the Council of Europe's Committee of Ministers addressed to member States, and other relevant instruments, public service media have a special role to play in promoting diversity and setting quality standards. States should ensure stable and sufficient funding for public service media in order to guarantee their editorial and institutional independence, their capacity to innovate, high standards of professional integrity, and to enable them to properly fulfil their remit and deliver quality journalism. These aims and objectives should not be compromised by diverting public service media funding schemes for other purposes, such as support measures or schemes aimed at other media sectors.
- ▶ **Children:** the information needs of children of different age categories should be specifically addressed through the availability, via all relevant media and platforms, of wide-ranging quality content suited to their interests, literacy levels, linguistic preferences and cultural background. Such quality content should include informative and factual content and educational and cultural content, as well as content with entertainment value. Newsrooms, especially within PSM, are encouraged to invest in the production and dissemination of news and current affairs programming and services specifically targeting children and young people. In doing so, they are encouraged to promote opportunities for young people's involvement in quality content production and engagement with such content, for instance by using genres, formats and distribution channels that speak to and interest young audiences. Community media activities involving different age groups in journalistic training and production contribute to exchange and dialogue across generations, and also need specific support.
- ▶ **Public service media's contribution to society:** independent PSM, in particular, have an important social function as a trusted source of information. They play a central role in portraying events in a comprehensive and inclusive manner, explaining complex situations and changes, allowing the public to distinguish the important from the trivial and highlighting constructive solutions to important challenges. States have the specific obligation of ensuring that public service media enjoy editorial autonomy and are able to operate independently, and that their content is universally available, including online.

## **Recommendation CM/Rec(2022)11 on principles for media and communication governance**

In the latest Committee of Ministers' Recommendation, fifteen procedural and substantive principles for media and communication governance are laid down that have implications for all governance structures and processes in the digital media environment. The principles summarise and update the existing body of standards to provide a comprehensive framework of governance underpinned by the human rights dimension; three of the principles explicitly refer to the role of PSM.

Principle no. 8 underlines the importance of funding of PSM in the context of promoting media pluralism and safeguarding the sustainability of journalism.<sup>47</sup> The underlying argument echoes Recommendation CM/Rec(2018)1<sup>48</sup> in that PSM play a crucial role in promoting pluralism and diversity, but also relies on the ideas laid down in Recommendation CM/Rec(2012)1.<sup>49</sup> The Explanatory Memorandum further emphasises that PSM's remit should be extended in a way that allows innovation and high-quality service and content, including provision of personalised content, on-demand services and content via third-party platforms.<sup>50</sup>

Principle no. 13 recognises that strengthening the role of PSM in terms of offering personalised services also presents a line of defence against the risks posed by algorithmic curation, selection and prioritisation oriented towards maximum engagement of target audiences. Personalised recommendations provided by PSM can be used to enhance exposure diversity and improve the discoverability and prominence of quality journalism, thereby serving the public interest.<sup>51</sup> Indeed, this is in line with the recommendations made by PSM themselves, namely that platforms should be better utilised for promoting PSM national content to a global audience, which includes the exchange of content between national PSM, also as a promotion of excellence and a culture of tolerance.<sup>52</sup> Principle no. 14 complements this by calling for availability, accessibility and affordability of diverse content for all groups of the population, without any discrimination, emphasising the need to safeguard the role of PSM in this connection.

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47. Recommendation CM/Rec(2022)11 of the Committee of Ministers to member states on principles for media and communication governance. [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectId=0900001680a61712](https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=0900001680a61712)

48. Recommendation CM/Rec(2018)1 of the Committee of Ministers to member states on media pluralism and transparency of media ownership. [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectId=0900001680790e13](https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=0900001680790e13)

49. Recommendation CM/Rec(2012)1 of the Committee of Ministers to member states on public service media governance, §§ 1-5. [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectId=09000016805cb4b4](https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=09000016805cb4b4)

50. Explanatory Memorandum to Recommendation CM/Rec(2022)11 of the Committee of Ministers to member States on principles for media and communication governance, CM(2022)44-addfinal, § 8.5. [https://search.coe.int/cm/pages/result\\_details.aspx?objectid=0900001680a5bd7c](https://search.coe.int/cm/pages/result_details.aspx?objectid=0900001680a5bd7c)

51. Recommendation CM/Rec(2022)11 of the Committee of Ministers to member states on principles for media and communication governance, Principle 13. [https://search.coe.int/cm/Pages/result\\_details.aspx?ObjectId=0900001680a61712](https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=0900001680a61712)

52. International conference on Public Service Media and Democracy Prague 2016: Conclusions and recommendations by the conference participants, <https://www.ebu.ch/files/live/sites/ebu/files/News/2016/11/Final%20conclusions%20Prague%2014112016%2017.43.pdf>