

Article

Governance of Public Service Media in Poland: The Role of the Public

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Abstract

This paper analyzes the role of the public in governance processes in public service media (PSM) in Poland in the post mass-media era, characterized by participatory culture and network practices. Referencing the findings of the “Democratization of media policy in the digital ecosystems” (2014–2015) research project, the study aims to map the effectiveness of existing tools, practices and attitudes toward opening-up Polish public media enterprises to the public. Examination of media regulation, grey literature (corporate documentation, strategies, reports) and civil society initiatives are likely to indicate the ways and extent to which members of the public might currently participate in the decision-making and control. On the basis of hypotheses that public media enterprises in Poland are not fully prepared for the multi-stakeholder and advanced model of PSM, the study takes into account potential systemic/regulatory, organizational and social barriers for change. The salient questions to be addressed are: What are the strategies and practices through which members of civil society might get involved? At what stages are the publics able to engage? How can PSM take advantage of the development of online tools offering space for interaction and collaboration? How is it possible to make the public more active and interested in governance and participation?

Keywords

civil society; media governance; media regulation; participation; Poland; public service media

Issue

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1. Introduction

Media organizations worldwide are currently challenged by network practices, the emergence of creative audiences and easy access to online production tools. New technologies, practices (media activism, collaborative media-making, crowdsourcing, beta testing) and media-like firms (social networks, search engines, content aggregators) that offer possibilities for publics’ participation and involvement require traditional media outlets of press, radio and TV to redefine, reorganize and change in order to adapt to fluid digital ecosystems of the post mass-media era. Future scenarios for traditional media firms often relate to power shifts in terms of production and the making of media policy (from top down policy making to the processes of governance). The latter

is connected to the examination of emerging modalities and practices that support involvement, empowerment and participation of different media stakeholders.

The user-centric approaches, which are based on openness, responsiveness and transparency are of critical importance for public service media (PSM), which has been tasked to serve the societal and cultural needs of each member nation and to promote democracy and participation within the national geographical boundaries (Council of Europe, 2012; EBU, 2014). Outwardly, PSM would seem ideally placed to thrive in the online and digital environment which benefit open production systems, interaction and harvesting of ideas from creative individuals and suppliers. Empowering the stakeholders of PSM businesses—(i.e. the public), the owner and (in many cases through a combination of the

licence fee system and taxation) also the funder—shall be the guiding principle as the processes of production and consumption blend. However, in many EU countries this has not proved to be the case. In many countries, PSM has been criticized for a lack of independence from government, bias, and hierarchical and rigid organizational structures. Additionally, many PSM firms still see websites as a ‘bolt-on’ extras for, as marketing platforms for ‘traditional’ broadcast media (Głowacki & Jackson, 2014). Last, but not least, policy makers as well as leaders and managers of public media have not yet recognized the potential of the multi-stakeholder and advanced model of PSM business, which requires policies and tools to support civic engagement. This could be facilitated through institutional arrangements (audience councils, supervisory bodies), media criticism and accountability, viewers’ and listeners’ associations, as well as inclusion of the public in consultations related to media policy. Policy makers should also take into account media literacy initiatives to strengthen the quality of public discourse, to show that the public’s voice matters as well as different social and cultural architectures, in which public media is mandated to serve.

This paper analyzes the role of the public in governance processes in Poland’s PSM. Referencing the findings of the “Democratization of media policy in the digital ecosystems” (2015) research project, this study aims to map the effectiveness of existing tools, practices and attitudes toward decision-making and control in Polish Television (Telewizja Polska, TVP). The study hypothesizes that public media enterprises in Poland are not fully prepared for the post-mass media era. Thus, the study examines the potential systemic/regulatory tools, organizational practices, as well as social and mental barriers for change (both of the attitude of policy makers and public media leaders to think beyond the broadcasting model and of the willingness of the public to get involved). To this end, special emphasis is being placed on values and principles of good governance as well as the role and characteristic features of the Polish civil society.

The study examines media regulation, grey literature (corporate documentation, strategies, reports) as well as discussions held during a scientific seminar at the University of Warsaw (October 17, 2014) with participation by scholars, policy makers and public media professionals. Among the salient questions to be addressed are: What are the tools and practices through which members of civil society might get involved? At what stages are the publics able to engage? How can PSM take advantage of the development of online tools offering space for interaction and collaboration? How is it possible to make the public more active and interested in governance and participation?

2. Power Shifts in Media Policy and Public Service Media

The rise of networks, media-like businesses (such as

Buzzfeed, Kickstarter, Uber) together with changes in users’ behavior, growing market competition and processes of convergence have generated new areas and thus targets for media policy. In the post mass-media era, the old media policy paradigm, which was based on the pyramid of power and a hierarchical management, has recently started to evolve towards a model that is more open and decentralized. Both scholars and practitioners have evidenced the evolution of traditional top down policy towards processes of governance, requiring in particular a change in the nature of power as well as the inclusion of new actors in the production of contemporary media (Rossi & Meier, 2012). Freedman (2014) observes that nowadays power “circulates in a messy rather than a controlled fashion...reflecting the more uncertain and contingent circumstances in which we live” (p. 89). He further argues that new technologies and media create “multi-dimensional mosaic form of power” (Freedman, 2014, p. 97) with power shifts between state authorities and non-state actors being demonstrated by strategic re-organizations, prototyping, collaborations with independent producers, and so on. De Geus (2002) argues the goal is to find a balance between empowering people and providing effective control: “Almost everyone is on favor of decentralization and empowerment—in other words for increasing freedom. But even today, few dare to risk the accompanying loss of control” (De Geus, 2002, p. 140). De Geus also claims that there is a need to develop a “system of corporate governance that provides continuity..., without absolute power concentrated in the hands of either shareholders or management” (2002 p. 197).

Overall, democratization and changing approaches to media policy caused by social change and technological development should be analyzed in relation to goals, collaboration between media stakeholders as well as tools that enable different agents to participate in the creation of media policy. Simultaneously, analysis should take into account values and principles such as openness, accountability, transparency, multidimensionality and independence (Jaskiernia & Głowacki, 2015) (see Figure 1).

Current shifts in media policies have a profound impact on the functioning of PSM and the ongoing searching for a PSM model. Several researchers argue for a more people-centric public media (Clark & Aufderheide, 2009; Jakubowicz, 2008) as well as the overall reinvention and extension of public media for the digital age (Bennett, Strange, Kerr, & Medrado, 2012; Suarez-Candel, 2012). However, national constraints affecting PSM changes have been largely analyzed in relation to external factors such as limitations placed by policy-makers on PSM businesses, interference by Government, or a lack of accountability and transparency (Bajomi-Lazar, Stetka, & Sukosd, 2012; Zankova, 2014). Although some experts and scholars, including

<p style="text-align: center;">GOALS (Why democratize media policy?)</p> <p style="text-align: center;">Social/political/economic/cultural goals Empowerment Participation Exchange of views Co-creation and co-accountability</p>	<p style="text-align: center;">STAKEHOLDERS (Who should be involved?)</p> <p style="text-align: center;">State institutions International organizations Market forces Media Civil society</p>
<p style="text-align: center;">TOOLS (How to make democratization work?)</p> <p style="text-align: center;">Public consultations Complaint mechanisms Programming councils of PSM Listeners' and viewers' associations Online media</p>	<p style="text-align: center;">VALUES AND PRINCIPLES (Which values and principles?)</p> <p style="text-align: center;">Openness Diversity of stakeholders and interests Multidimensionality Independence Co-decision and legitimization Transparency and accountability</p>

Figure 1. Selected dimensions of media policy democratization. Source: Based on Jaskiernia and Głowacki (2015, p. 12).

Aslama (2010), Krichels (2014) and Leurdijk (2013), have already looked at emerging approaches to creativity and PSM audiences, there have been few attempts to undertake studies on tools that enable users to formulate, discuss and raise criticism towards the development of corporate strategies and policy proposals. New models of public media governance require examination of both the ways, in which PSM build new partnerships with creative publics as well as internal changes of “structures, processes and behaviours operating throughout the organisation” (Council of Europe, 2012).

3. Participation in Public Service Media

Public service media cannot be understood outside the social, political, economic and cultural environment. A nation’s PSM reflect the quality of democracy and public involvement. The empowerment of the public based on participation and collaboration has for long been treated as both a PSM objective, as well as a legitimizing agent for any public media enterprise (Lowe, 2010). However, in the 20th Century when the idea of public service broadcasting was launched and passed through the various stages of development (including the collapse of the PSM monopoly and the introduction of the dual system of broadcasting) relations between public media and civil society were rather asymmetrical and there was no balance of power (Jakubowicz, 2008). If public media is to deliver the right remit it needs to see participation as a driving force for its own activities and operations.

As for relations between the public and the PSM, the notion of participation might be analyzed through both existing practices stimulated by top-down policies

as well as the publics’ ability to initiate bottom-up activities. Firstly, participation can be evidenced through relations between independent producers, collaborative media-making, letters to the editors, consultation meetings and face-to-face communication. In the broader perspective participatory approaches are to be observed in the audience shares as well as the level of public support in funding PSM (the last indicator is especially important for public media which is funded through a license fee). Finally, civic engagement might be facilitated through public consultations, participation in decision-making and control, as well as the existence of audience councils, feedback loops, complaints mechanisms, and so on. All these patterns are of critical importance as they might create the idea of shared responsibility, trust and the feeling that the public owns a PSM enterprise.

On the other hand, despite the growing number of tools derived from technological development a crisis in democratic participation, with a fall in party membership, reduced involvement in political campaigns and a sharp decline in voting at elections generate questions about the potential and effectiveness of public involvement. As Lowe (2010, p. 12) notes, civic engagement in the internet era might not only be declining but might also be evolving into new forms.

4. Mapping Tools and Practices Enabling Public Participation

Guided by theoretical considerations, the following paragraphs analyse selected tools that enable public to participate in the creation of PSM in Poland. The intention is to identify the potential of existing tools and to further elaborate on the potential and effectiveness of

public involvement. The study draws on practices of public consultations, programming councils, viewers' and listeners' associations, public criticism towards PSM as well as the role of new media and technologies. The focus is mostly on Telewizja Polska (Polish Television, TVP), whose tasks and responsibilities are laid down in the Broadcasting Act of 1992 (Article 21)¹. TVP1—the first channel of Polish TV holds the largest share of the audience². Both Polish TV and radio are funded through commercial and public revenues. However, the level of evasion of the licence fee is regarded as being one of the highest among the members of the European Broadcasting Union, and as a result, TVP “necessarily relies on commercial/advertising revenue in order to fulfil its public interest objectives” (EBU, 2015, p. 9).

4.1. Public Consultations

Poland has broadly developed the practice of public consultation, by which publics might raise their voices to be heard on matters affecting them. One of the examples created at the state level is the Governmental Portal for Public Consultation in relation to local and regional activities, which through the online platform www.konsultacje.gov.pl, aims to collect opinions on draft legislation and making them available as public information. The list of the projects as of June 2015 included legislation regarding various social and economic issues, such as “Priorities for Industrial Policies (2015–2020+)” and proposals for disclosing prices of goods and services, changes in the business law, and so on. The platform is only open for discussions by anyone who registers to use the service, enabling both institutional and private users to comment on policy proposals. Although the website indicates 100,000 registered users, their engagement with the four projects open for discussion on June 10 2015 was poor: 891 views and just one comment was posted³.

Regarding media policies, the National Broadcasting Council (NBC)—regulatory authority for electronic media in Poland—allows feedback on a selection of regulations, strategies and projects dedicated to a wide range of issues for media, including those related to PSM. The consultations are open for participation by both private firms and individuals; feedback and com-

ments on policy-related issues are collected via e-mails and regular mail correspondence⁴. The NBC gathers feedback on the list of broadcasting important events; the protection of minors and people with disabilities, the regulations on campaign advertising, and so on. For instance, in the context of the list of important events (open for discussion June 13, 2013 to July 28, 2013), a total of 86 responses were received. Among the stakeholders who participated in this discussion were state authorities and consumers' associations (4), broadcasters and consumers' associations (3), sports associations and owners of rights (5), individuals (48) and anonymous contributions (26)⁵. In a similar vein, the voices of individuals were among the most popular when discussing the proposal to limit TV broadcasting for people with disabilities (April 11, 2013–May 7, 2013). This discussion involved 161, of whom 134 were individuals. The summary of the discussion notes however, that the majority of contributions (128 out of 134) were acquired by circulating a template letter, that did not address any key issues emphasized in the draft proposal⁶. Most recently, financial and programming plans of PSM both on the national and regional level (April 24, 2015–May 25, 2015) each generated two responses, both of which were raised one person, arguing for more financial support to local PSM broadcaster Radio Katowice⁷.

Overall, the examples public consultation have proven that the level of publics' participation depend on the topic that is being discussed and the quality of contributions varies. Another issue that arose is the form and stage, at which the public gets involved at the level of media policy creation. Maria Łoszevska-Ołowska (2014) notes that the majority of online platforms for public consultations enable citizen participation predominantly for unchangeable, finished proposals, which therefore do not include public's contribution at the level of document creation. In her

⁴ *Konsultacje* [Consultations]. Retrieved from <http://www.krrit.gov.pl/regulacje-prawne/konsultacje-krrit>

⁵ *Omówienie wyników konsultacji projektu rozporządzenia Krajowej Rady Radiofonii i Telewizji w sprawie listy ważnych wydarzeń* [Discussion of the results of consultations on the draft of the National Broadcasting Councils' regulation towards the list of important events]. Retrieved from http://www.krrit.gov.pl/Data/Files/_public/Portals/0/konsultacje/2013/omowienie-wynikow-konsultacji_2_.pdf

⁶ *Omówienie wyników konsultacji projektu rozporządzenia Krajowej Rady Radiofonii i Telewizji w sprawie niższego udziału w programie telewizyjnym audycji z udogodnieniami dla osób z niepełnosprawnością wzroku i osób z niepełnosprawnością słuchu* [Discussion of the result of consultations on the draft of the National Broadcasting Council on the lower share in television program broadcasting facilities for persons visually impaired and persons with hearing disabilities]. Retrieved from http://www.krrit.gov.pl/Data/Files/_public/Portals/0/konsultacje/wyniki-konsultacji-w-sprawie-audycji-z-udogodnieniami.pdf

⁷ Data retrieved from Department of Public Service Media at the National Broadcasting Council.

¹ *Ustawa z dnia 29 grudnia 1992 o radiofonii i telewizji* [Broadcasting Act of December 19, 1992]. Retrieved from <http://isap.sejm.gov.pl/DetailsServlet?id=WDU19930070034>

² *TVP1 nowym liderem. Duży spadek Polsatu i TVN* [TVP1 is a new leader. A big drop of audience shares of Polsat and TVN]. Retrieved from <http://www.wirtualnemedia.pl/arttykul/tvp1-nowym-liderem-duzy-spadek-polsatu-i-tvn-m-jak-milosc-hitem-tygodnia>

³ *Rządowy Portal Konsultacji Publicznych* [Governmental Portal for Public Consultations]. Retrieved from www.konsultacje.gov.pl

opinion, it is crucial not only to listen to the public, but also how to select the most valued proposals.

4.2. Programming Councils in Public Service Media

The voice of the public in PSM in Poland is supposed to be heard through the programming councils, which were created to provide advice and opinion on the content of public radio and TV. These bodies, which were created both on the national and regional level, are tasked to issue resolutions and statements on the PSM content and to further supervise decision-making processes at the level of Management and Supervisory Boards. Programming councils are tasked to issue opinions on fulfillment of the PSM remit, as defined in article 21 of the Broadcasting Law. Members of the TVP councils are appointed by the NBC. They consist of 15 members, 10 of whom represent parliamentary groups and political parties, while the other 5 are appointed from among people with achievements and experience in culture and media⁸.

Discussions on the effectiveness of the PSM programming councils have for long emphasized their weakness and problems, including, for example, the lack of clearly specified competences, the limited impact on PSM, as well as the high level of politicization derived from close relations with political parties' representatives. Teresa Sasińska-Klas (2014) argues the current role of the programming councils is dysfunctional and pathological in view of the aim they were set up. The NBC has recently noted a need for more active involvement of the programming councils in the evaluation of PSM performance⁹. Among the ways their functioning could be improved is changing both the composition and appointment procedures in order to offer space for voices of individuals. Finally, the reform could also support the idea of more tasks and competences, so the programming councils could, for instance, be more active in the discussions on financial plans for PSMs (Zgódka, 2014).

4.3. Complaints

As in many other countries, the practice of the public's participation in PSM is also facilitated through mechanisms offering space for feedback, criticism and complaints on media performance. The tools that are offered here could be split through those referring to provisions derived from media regulation as well as self-regulation, which is related to media ethics, jour-

⁸ *Regulamin Rady Programowej TVP SA* [Terms of Reference of TVP Programming Council]. Retrieved from <http://centruminformacji.tvp.pl/15780343/regulamin-rady-programowej-tvp-sa>

⁹ *Strategia Regulacyjna na lata 2014-2016* [Regulatory Strategy for 2014-2016]. Retrieved from http://www.krrit.gov.pl/Data/Files/_public/Portals/0/sprawozdania/strategia.pdf

nalism culture and professionalization.

Complaints regarding provisions, as laid down in the Broadcasting Act are collected by the NBC. On the NBC's website, users of digital media in Poland might disseminate their voices through both the traditional means of written correspondence, as well as using the online form, which requires the name of the broadcaster, the title of the program and the broadcasting date. Furthermore, the online submission requires the personal data, name, surname and residential address, of the individual issuing the complaint or feedback. Feedback on the activities of the NBC demonstrated the public's involvement in criticizing media performance. According to the 2014 report, 2411 complaints were submitted to the NBC. The majority of the feedback were complaints regarding the license fee and the programming performance of radio and television (both PSM and private media enterprises). Additionally, the feedback concerned advertising, the operations of cable satellite operators and technical matters relating to broadcasting (see Table 1).

Table 1. Number and topics of complaints submitted to the National Broadcasting Council in 2014.

Topic of complaint	Number of complaints
Licence fee	950
Program	705
Technical matters	147
Advertising	140
Operations of cable and satellite operators	107
Election campaigns	36
Other*	326
TOTAL	2411

Note: * includes employment policies, appointment procedures in public service radio and TV companies and funding of PSM¹⁰. Source: *Sprawozdanie z działalności KRRiT w 2014 roku* [Report from activities of the National Broadcasting Council in 2014]. Retrieved from <http://www.krrit.gov.pl/krrit/sprawozdania>

Complaints on the quality and objectivity of programming with a reference to PSM values defined in the Broadcasting Law are forwarded to broadcasters¹¹. The

¹⁰ *Sprawozdanie z działalności Krajowej Rady Radiofonii i Telewizji w 2014 roku* [Report from the activities of the National Broadcasting Council in 2014]. Retrieved from <http://www.krrit.gov.pl/krrit/sprawozdania>

¹¹ Article 21 of Broadcasting law of December 29, 1992 states that "Public radio and television shall carry out their public mission by providing, on terms laid down in this Act, the entire society and its individual groups with diversified programme services and other services in the area of information, journalism, culture, entertainment, education and sports which shall be pluralistic, impartial, well balanced, independent and innovative, marked by high quality and integrity of broadcast"—

NBC does not have competences on media self-regulation, and can therefore only ask a media enterprise to respond and explain.

In addition to general ethical standards related to media ethics and journalism professionalization laid down in the Charter of Media Ethics, TVP has adopted principles of journalistic ethics, which defines standards and behavior in relation to information and opinions, information gathering, respecting privacy, scenes of violence, and so on¹². All ethical standards and rules are being safeguarded by the Ethical Commission which investigates both in response complaints issued by TVP employees and members of the public, as well as on its own initiative. People who are dissatisfied with the programs offered by PSM might raise their comments and complaints directly to the broadcasters. Selected judgments and opinions are made available on the website of TVP¹³. No ombudsman-like institution has been created in the Polish PSM.

Overall, as in the case of public consultation, the level of activity of civil society in the complaints procedures depends on the issue that is being discussed and the tools that offer inclusion and empowerment. Teresa Sasińska-Klas (2014) contends a complaint is an offensive strategy, when one considers it is the only possible way that citizens can influence the programming policies of PSM.

4.4. Viewers' and Listeners' Associations

Although the possibility to create an organization to represent the rights of listeners and viewers was discussed at the early stages of the social, political and media transformations in the early 1990s, representatives of civil society have not managed to make their efforts more institutionalized. In fact, in Poland the institution that could represent civic interests, protect and defend public's rights and further play a role in holding PSM to account (such as The Voice of the Listener and Viewer organization in the United Kingdom) does not exist. Agnieszka Ogródowczyk (2014), Director of the Strategy Department at the NBC, opines that the establishment of such an initiative could have a positive impact on the quality of the media. The lack of a viewers' and listeners' association is often explained by the weakness of civil society and the level of interests in being actively involved in activities of non-governmental organizations.

Ustawa z dnia 29 grudnia 1992 o radiofonii i telewizji [Broadcasting Act of December 19, 1992]. Retrieved from <http://isap.sejm.gov.pl/DetailsServlet?id=WDU19930070034>

¹² *Zasady etyki dziennikarskiej w Telewizji Polskiej* [Principles of journalistic ethics]. Retrieved from <http://centruminformacji.tvp.pl/15781144/zasady-etyki-dziennikarskiej-w-telewizji-polskiej>

¹³ *Komisja Etyki: Orzeczenia i opinie* [Ethical Commission: Judgments and opinions]. Retrieved from <http://centruminformacji.tvp.pl/15780600/orzeczenia-i-opinie>

4.5. The Potential of New Technologies and Media

The rise of new technologies and media offer new tools and opportunities for the public to get involved in the creation of contemporary media enterprise in terms of decision-making and control. The potential has been recognized by several media-like businesses, such as Facebook, which—through its Facebook Site Governance—has for long consulted on strategies, ethical standards and rules as well as future developments in the platforms with users. Online comments and petitions, blogs, mobile applications and social media have the potential to establish new relationships between the public and PSM.

However, research conducted within the international research project “Media Accountability and Transparency in Europe (MediaAct)” in 2010–2013 indicated that Polish media organizations have not fully adopted practices enabling civic participation when holding media firms to account. For instance, one of the conclusions from in-depth analyses of online media accountability innovations has indicated the lack of sufficient tools from the internal organizational perspective, which might be explained by financial and organizational limitations; getting involved in the debate on the quality of Polish media might not be regarded as the priority goal (Dobek-Ostrowska, Głowacki and Kuś, 2015; Kuś, 2011). Additionally, the underdevelopment of external initiatives, such as media blogs, citizens' and journalists' websites critically addressing media ethics issues, online documentation of research, podcasts of internal critique sessions, online ombudsman-like institutions, manifest the weakness of the publics, whose role should be to demand media responsiveness and accountability. Citizens' involvement in online media was mostly seen through the Facebook initiatives, which gathered participants interested in a specific topic and were mostly ad hoc and of either a protest or entertainment nature (Kuś, 2011).

5. Missing Link? The Social Dimension

All the examples mentioned above are evidence that both regulatory and institutional approaches cannot be analyzed without taking into account the social dimension, formed by the state of civil society, the willingness to participate and the potential barriers for change (attitudes of PSM leaders and managers included).

The advanced and participatory model of PSM requires the public and citizens who are able to self-organize in order to achieve specific goals for the public good. Although many indices and ranks define Poland among countries with a sufficient level of democracy,¹⁴ the studies conducted over recent years show

¹⁴ See for instance Freedom House (2015). *Freedom in the world 2015*. Retrieved from <https://freedomhouse.org/report/>

the low level of interest in matters of social life, participation in non-governmental organizations and participation in elections (Jakubowicz, 2011). Among the factors that could be used to explain the culture of low level participation are the legacy of communism, a relatively high level of distrust by citizens towards political elites, the perception of the state as a hostile force, uprooting of traditions and patterns of civic engagement, and so on (Kinowska, 2012). Bearing all these in mind, the goal is to have an in-depth examination at the causes of public disengagement as well as the tools, practices, mechanisms and the attitudes, through which PSM will manifest that the role of the public matters. This could be facilitated through ongoing dialogue with the public and maintaining a sufficient level of PSM responsiveness, which might contribute to the quality of public involvement and trust that civil society has in public media.

The social dimension might further require the removal of mental barriers for change in the relation with the leadership and management of PSM and creating the organic structure, in which creative ideas external to a PSM business might flourish. As Głowacki and Jackson (2014, p. 284) note “PSM outlets situated within these cultural and political ecosystems need to firstly solve problems inherited from the past, and specifically those which might interfere with the progression towards positive characteristics, such as independence, pluralism, openness, and inclusion”.

6. Values Matter Now

Democratization of media policy and developing a more advanced and participatory model of public media governance has recently been acknowledged by the NBC as one of the regulatory priorities for the period 2014–2016. The regulatory authority has noted a need for new opportunities for evaluation of PSM programming, in which non-governmental organizations participate, and has further recommended the development of new tools for participation¹⁵. However, any plan and strategy that might lead to strengthening relations between PSM and the public also needs to be analyzed with the redefinition of values and standards, which are of critical importance when discussing patterns of participation in PSM in the Polish case.

Media scholars, practitioners and policy-makers are aware of the need for PSM change in terms of co-decisions, legitimization, accountability and openness, so that public representatives are seen not only as passive audiences but also creative individuals who have a

freedom-world/freedom-world-2015, and Reporters Without Borders (2015). *2015 World Press Freedom Index*. Retrieved from <https://index.rsf.org>

¹⁵ *Strategia Regulacyjna na lata 2014-2016* [Regulatory Strategy for 2014-2016]. Retrieved from http://www.krrit.gov.pl/Data/Files/_public/Portals/0/sprawozdania/strategia.pdf

role to play (Jaskiernia & Głowacki, 2015). Similarly, participants of the Warsaw University seminar in October 2014 emphasized a need for discussions on PSM transparency. According to Karol Zgódka (2014) from the Ministry of Culture and National Heritage in Poland:

We cannot merely remind society that it has the obligation to finance them....We have to show clearly how these media are created, why in this and not that way; how the program is formed and enable citizens to influence content creation.

Among the biggest challenges discussed in relation to values and standards of PSM in Poland, scholars and practitioners have argued for strategies and practices promoting a sufficient level of independence. Agnieszka Ogrodowczyk (2014) argues the lack of sufficient level of PSM independence might be viewed as one of the causes of low participation and support:

For 20 years we have had a problem with politicized public service media, which infused the audience with the conviction that these media belong to politicians. So why would members of society engage in these media now if they don't see their role and impact?

Katarzyna Pokorna-Ignatowicz (2014) spoke in similar vein:

We all know that we have a problem with citizens' participation since the civil society is weakly structured, but I would ask about the causes of this situation and why for 20 years public service media have not managed to convince society that they are for them?

Beata Klimkiewicz (2014) argues the contemporary role of media users is essential, which Teresa Sasińska-Klas (2014) supports:

We don't have any idea how this crucial social segment could be activated, even though we will need to listen to the opinions of civil society in the processes of democratization.

Sasińska-Klas (2014) calls for the development of a structural analysis, which will be able to diagnose both the strengths and weaknesses of specific components comprising media policy, which would cover the multi-stakeholder approach and further specify the role public should play.

7. Conclusions

New technologies and media together with social, political, economic and cultural changes call for redefini-

tions of goals, values, media stakeholders and approaches to media policy and the ways, by which the public might get involved and become empowered. Power shifts in the media resulting with the emergence of more user-centric approaches are of critical importance for public media which serve as platforms for civic engagement and PSM remit in relation to education, culture, information and democracy. The PSM, whose task is to support participation and civil society development, is in the twenty-first century required to find new ways to foster participation in the context of its daily internal functioning. This creates space for discussions on the potential and effectiveness of practices, tools and mechanisms, through which the public might get actively involved in the processes of decision-making and control of PSM. The analysis of the current state-of-the-art, more advanced and participatory model of public service media in Poland has emphasized both potentials and pitfalls in relation to regulatory, institutional and social levels of its development.

First, research presented here has pointed out a rather low level of efficacy of the tools and practices, through which public could get involved in the creation of Polish PSMs. This is manifest, for instance, when examining the composition and tasks of programming councils of PSM, which are mainly composed of members of parliament. Among the regulatory and institutional barriers for change, there are the stages, at which the public might get involved in the consultation processes. For example, in the majority of cases, members of the public are asked to provide feedback and comments on projects, strategies and visions that have already been completed (i.e. not during the development process). This failing combined with the lack of media ombudsman-like institution and a viewers' and listeners' association might explain the low level of public engagement.

Secondly, in-depth analysis of civic engagement in creation of PSM in Poland showed that the public very rarely participate in the public consultation, and the level of being active mostly depends on the topic that is being discussed. The existing tools and practices, including consultations and complaints generate the highest level of public response which is usually ad hoc, and while being a recognized form of protest is not necessarily of high quality. New technologies and media have not yet improved public participation in the production process of PSM. This is due to the lack of both internal PSM instruments supporting openness, responsiveness, accountability, transparency and a vision of shared responsibility as well as the that of external bottom-up approaches through which the publics could mobilize themselves to participate.

Overall, the potential of a more advanced and participatory model of public media in Poland has not yet been recognized. Bearing in mind the weakness of participation in the public life, the goal is to find a balance

between empowerment and control and to continue the discussions on PSM in relation to regaining trust and convincing the public that it has a role to play. New partnerships between PSM and the public requires ongoing discussions and strengthening the level of responsiveness in order to create PSM which is truly public. The call for more proactive practices and processes should go in line with the definition of values and the role of the public should be the guiding principle in the discussions on the development of Polish model of PSM. This should be further accompanied by issues related to media literacy, and the issues of how to make the publics more interested in the making of public service media.

Conflict of Interests

The author declares no conflict of interests.

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