Challenging the Public Service Remit: A Cross-National Comparison of Guidelines for PSM Multiplatform Journalism

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Public Service Media (PSM) organizations have been adapting to the introduction of digital technology and multiplatform opportunities over the past 2 decades. This process, conceptualized as a shift from Public Service Broadcasting to PSM, is intended to revitalize the public service mission. Although this movement has been well documented, we noted a lack of studies on how public broadcasters had to develop editorial guidelines to implement strategies effectively and establish leadership in a competitive media landscape. We sought to fill this research gap by applying a comparative, qualitative document analysis to assess how 11 PSM organizations from 10 countries articulated these strategies in editorial guidelines and related documents. The results indicated that all 11 broadcasters fulfilled at least one criterion for assessing multiplatform journalism documentation. However, the degree of centrality varied considerably. Our data suggest that a solid track record of investment and a central position in the national media landscape may drive PSM providers to perform better in terms of the transparency and comprehensiveness of multiplatform journalism policies.

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Public service journalism has lost space in the shift from Public Service Broadcasting (PSB) to Public Service Media (PSM), as PSM organizations have sought to renew "the public service ethos and revitalizing the public service mission for a multimedia and polymedia environment" for the last two decades or so (Bardoel & Lowe, 2007, p. 9). In most countries, however, the legacy of PSM organizations as broadcasters remains influential, and various structural challenges inside and outside these organizations (Donders, 2021, p. 26) still hinder the transformation of PSB into genuine multiplatform providers.

Local investigative journalism and domestic content are struggling to survive in a landscape where "the platformization of media markets is adding to the pressure on public broadcasters" (Donders, 2021, p. 30). However, providing credible and balanced information still legitimizes and sustains PSM and PSB organizations worldwide. Various studies have demonstrated the impact of PSM news offers on a well-informed citizenry in many countries, arguing that these contribute to nothing less than the well-being of democracy (e.g., Castro, Nir, & Skovsgaard, 2018; Cushion, 2012; Neff & Pickard, 2024; Soroka et al., 2013).

Although such an impact has been well documented by scholarship, we noted a research gap in how public broadcasters developed protocols and guidelines rooted in democratic values and the public service mission, not only to implement strategies effectively but also to set standards that establish leadership in a competitive, primarily private and transnational media landscape, whether on their digital platforms or third-party offerings such as social networks.

PSM organizations are expected to reach people where they are while delivering content on third-party platforms such as social media, which raises ethical questions and fuels discussions about the obsolescence of PSM. To quote Donders, Raats, and Tintel (2019) on the commercial activities of public broadcasters, we might refer to public broadcasters and multiplatform activities as "damned if they do, damned if they don't" (p. 30).

Since at least the mid-2000s, when scholars pointed out that a paramount challenge of PSB was the transition to PSM, long-existing demands have been revitalized (Bardoel & Lowe, 2007). From supply orientation to demand-oriented approaches to service and content offer, the changes have been accompanied by a set of legal determinations that seek to address needs such as "securing of diversity and respect for pluralism, [. . .] providing quality news and information, cultivating cultures and supporting democratic process" (Bardoel & Lowe, 2007, p. 11).

However, given the diversity of missions and principles among the numerous PSM providers and the speed of technological change, the level of transparency of the practices used to ensure the institutional mission varies. There is no lack of legal guidelines within the European Union or the Council of Europe, nor recommendations from scholars indicating that PSM providers must maintain their independence. One way to obtain legitimacy for this is to explain how they meet their obligations in the movement toward offering

new services and content of high quality supported by technology, as indicated in the literature (Bardoel & Lowe, 2007; Rodríguez-Castro, Campos-Freire, & López-Cepeda, 2020). Despite the centrality of theoretical guidelines and regulations, it is plausible to expect differences between providers. Moreover, given that such guidelines are not always strictly enforced and exist in other parts of the world, we can expect sharper contrasts between individual PSM organizations.

The incorporation of participation and interaction in public service journalism and content production, primarily through digital technology, is well debated in the literature. While some question whether it affects PSM's contribution to citizenship, others suggest that it enriches public debate (Anstead & O'Loughlin, 2011; Enli, 2008; Mcnair, Hibberd, & Schlesinger, 2002; Sundet & Ytreberg, 2009; Syvertsen, 2004). Participation and interaction can be assessed in moderation, responsiveness, and complaint channels—practices that should be managed transparently. Guidelines for multiplatform journalism should be easily accessible to the public as normative standards for consolidating PSM values in information-rich environments and bringing journalistic practices one step closer to fulfilling the public service mission across platforms. However, little research has been conducted on how easily PSM organizations provide access to and transparency about such guidelines. Our study also contributes to filling this research gap.

Consumption of news media in traditional formats would be less influenced by personal selectivity since a printed newspaper, for example, presents a menu of information assembled through the curatorial activity of professional journalists with the norms, values, and ethics that usually characterize newsgathering. On the other hand, Internet consumption is often influenced by mechanisms—often unconscious—that people typically use to avoid drowning in the sea of information, allowing them to survive by filtering what fits within their time and interests. In addition, online consumption is influenced by bubbles and algorithms at a pace of quick and selective reading that seldom allows for depth.

> When people get the news from social media, they are [. . .] mainly exposed to headlines, filtered by their respective social networks and algorithms. In most of these cases, people do not click on the links leading to the full news stories. (Strömbäck et al., 2022, p. 53)

Strömbäck et al. (2022) draw from Andersen and Strömbäck's (2021) research to argue that "people learn less from using digital and social media compared to traditional news media" (p. 53).

According to Strömbäck et al. (2022), the literature also provides evidence of people's tendencies to not necessarily accept diving into bubbles, preferring instead to browse news from reputable and diverse sources. Such trends vary across age groups, social groups, regions, and countries, and evidence suggests that they are mainly present in countries with strong PSB (Bos, Kruikemeier, & de Vreese, 2016; Castro et al., 2018).

A strong PSB—and strength here means greater audience shares—"equalizes opportunities for cross-cutting exposure," as "the supply of news is larger, particularly during primetime [. . .], and the news coverage is expected to reflect an obligation to be politically balanced and to present diverging perspectives" (Castro et al., 2018, p. 2). The assumption is that the intense availability and distribution of information through several articulated media outlets creates a rich environment in which unintentional crosscutting

media exposure becomes more likely. At the same time, selectivity based on personal political party preferences and ideological and affective affinities would be lower. "Personal political interest can be expected to be a less important predictor of cross-cutting media exposure than in media systems with weaker public service broadcasting" (Castro et al., 2018, p. 2).

Among the reasons for this, one is crucial to the rationale behind the design of our research, namely, the contribution of PSM journalism to "media supply integration" (Castro et al., 2018, p. 4), made possible by the dominant presence of news with political balance, diversity, and representativeness in the set of options offered by the media market in general, which, in turn, posits PSM news as a positive model for commercial media, with spillover effects on editorial standards across the media landscape (see also Reinemann, Scherr, & Stanyer, 2016).

Assuming that the selectivity exercised by different audiences is perceived by journalists, what role do their perceptions of the audience play in their quest for selective interest? This aspect can be explored using the concept of platform imaginaries, which is defined by van Es and Poell (2020) as "the ways in which social actors understand and organize their activities in relation to platform algorithms, interfaces, data infrastructures, moderation procedures, business models, user practices, and audiences" (p. 3). Suppose editors are transparent about how they intend to, or already do, produce, select, package, and distribute journalistic information across multiple platforms. In this case, they assume that their audiences can benefit from such a service. If, on the other hand, editors are not concerned about making their editorial decisions or the extent to which they use algorithms transparent, they may assume that their audiences are not interested in, or simply do not know how to evaluate, the strategies being put into practice in cross-platform journalism.

Thus, the mere transparency of relevant editorial norms suggests how audiences are viewed by those who produce cross-platform journalism. Perhaps algorithmic logic can ultimately be used as a scapegoat to relieve editors of the responsibility to make their decisions transparent; after all, the presence, prominence, or absence of a news story may simply result from the receptivity measured by the number of clicks it receives. However, algorithms hide decisions guided by news values embedded in the codes, and the choice of agenda precedes the coding. Studies indicate that, often, the knowledge of professional journalism favors views on what the public should consume or is more likely to consume, so the decrease in news diversity does not always come from the action of algorithms that reward the repetition of what is most accessed, but from the human action of editors in the old and good gatekeeping practices, as Möller, Trilling, Helberger, and van Es (2018) demonstrate. In this sense, bubbles can be formed not only by the automatic action of algorithms but also by manual commands from flesh and blood editors.

Another question is whether PSB's traditional mission of providing universalism—that is, programming that can inform, educate, and entertain the entire nation and unify tastes around a national lowest common denominator—could be updated by algorithms that recommend general interest news to revive this mission. Sørensen (2020) argues this is precisely the case: "In general, the personalized recommendations of PSM content emphasize continuity by providing a centrally curated universalism understood from a heritage rooted in broadcast channel curation" (p. 196). In any case, as we argue in this article, it is necessary to provide a certain degree of transparency for citizens to understand how PSM seeks

to fulfill its mission of serving an informed citizenry while exploring technologies to attract, retain, or expand its audiences. This requires greater transparency about algorithmic governance, which is the technical and journalistic principles that govern the flow of content across digital platforms.

Our goal is to examine the transparency and comprehensiveness of rules and values established by 11 selected public broadcasters for journalistic and editorial practices in a multiplatform environment. Driven by this goal, we conducted a comparative qualitative analysis of editorial guidelines and related documents that may provide rules for multiplatform activities in journalism.

Our research questions are as follows:

RQ1:   *Does multiplatform journalism achieve centrality and prominence in the editorial guidelines of selected public service media? Which reasons can be indicated for its variance?*

RQ2:   *How have these media explored different formats and digital possibilities through multiplatform journalism, and how can possible divergences and convergences between them be explained?*

RQ3:   *What are the recommendations for digital platform interaction, content moderation, and responsiveness provided by those media, and how can possible differences in depth and comprehensiveness between them be explained?*

A single hypothesis guides our search for answers to these research questions: the more developed and consolidated a public service medium is, the more transparent and thorough its guidelines will be for multiplatform journalism. To assess the degree of development and consolidation of a public service medium, we conducted a qualitative analysis of institutional documents and secondary sources about its trajectory and independence, which provided an overall evaluation of its track record of investment and centrality in the media landscape.

Our aim was not to describe the practice of multiplatform journalism in PSM. Instead, we wanted to understand how these media organizations structured and developed their documentation and planning to explore multiplatform journalism. This organizational dimension of planning is relevant because, if multiplatform journalism is not established and planned within the organizational structure and documentation, the lack of transparent, clear, and comprehensive guidelines can lead to distortions and practices that are disconnected from the principles that should govern public media.

From this, we can highlight the relevance and originality of our study, which sought to identify the shortcomings in editorial guidelines—specifically in the way they have been made publicly available online— that need to be addressed if multiplatform journalism is to be successfully explored to strengthen PSM, particularly when it is most needed to secure an environment of information integrity, as entailed by the Global Declaration on Information Integrity Online (Government of Canada, 2023).

Methodology

Our study was based on a qualitative framework developed through documentary research (Bowen, 2009). We analyzed editorial and strategic documents for general principles and best practices to understand how public media approach journalism and editorial practices in a multiplatform environment.

The definition of the analysis categories and the documentary research were carried out through an inductive approach. An inductive method proved to be an effective way to identify emerging patterns, formulate indicators, and evaluate dimensions inherent in the strategies adopted by the organizations studied. In this direction, there was an alignment between the literature review and documentary research, allowing for the identification of the critical normative and qualitative dimensions of contemporary multiplatform journalism. These dimensions were codified into indicators capable of indicating the presence or absence of these aspects in these organizations' strategic planning or editorial guidelines. We considered this approach appropriate for the exploratory nature of this research. The inductive method used to formulate these indicators allowed direct observation of these documents to provide a concrete overview of the extent to which this issue was being addressed, planned, or developed by public media in different national contexts.

As Bowen (2009) explains, document analysis is a systematic procedure for reviewing or evaluating documents that, like other qualitative research methods, requires data to be examined and interpreted to extract meaning, gain understanding, and empirically develop knowledge. "Document analysis involves skimming (superficial examination), reading (thorough examination), and interpretation" (Bowen, 2009, p. 32).

As a first step in validating the documents to be analyzed, we applied the set of four qualitative criteria proposed by Scott (1990) for documentary research processes: (1) *Authenticity* involves examining whether the evidence is genuine and of unquestionable origin; (2) *Credibility* entails assessing whether the evidence is free from error and distortion; (3) *Representativeness* involves investigating whether the evidence is typical of its kind and, if not, whether the extent of its atypicality is known; and (4) *Meaning* requires determining whether the evidence is clear and comprehensible.

We confirmed that the strategies and plans of public media organizations are authentic documents that transparently communicate the company's position to the public, reinforcing its values publicly. In terms of credibility, our analysis demonstrated that the documentation is reliable because it is a formal product, published on official channels, crafted after rigorous internal processes, and subjected to validation. These documents are also emblematic and representative as they contain guidelines and values adopted in professional and organizational practice or address strategic planning and directional objectives. In terms of meaning, they are designed to be transparent and understandable, catering to stakeholders and the broader public. In conclusion, this comprehensive approach enabled us to systematically evaluate the documents, ensuring their reliability and relevance in our qualitative analysis.

After validating the documentary research, we followed a series of methodological procedures during the data collection and analysis process, which we will summarize in the following paragraphs.

First, we mapped the sample and divided the qualitative information into categories and related indicators. At this stage, we defined which broadcasters should be included in our sample, considering two distinct criteria: the online availability of guidelines for PSM multiplatform journalism and the inclusion of countries with different levels of public service media development, a necessary choice for testing our hypothesis. Eleven broadcasters were selected: ABC (Australia), TV Cultura (São Paulo State, Brazil), CBC (Canada), France Télévisions (France), ARD (Germany)[2], ZDF (Germany), RTP (Portugal), SABC (South Africa), TVE (Spain), BBC (United Kingdom), and PBS (United States).

A total of 37 documents were analyzed. The authors have skills covering all the original languages to code them. The complete sample list can be found in the Appendix. We did not ask the broadcasters which documents on the matter existed; instead, we searched for them online since their open availability on the Web for consultation by the general public was itself assessed by our research. This may be seen as a limitation to the results, as we did not assess how editorial and strategic documents are followed in the newsrooms' daily routines. However, we attempted to address this limitation by carefully selecting the documents for analysis based on their relevance and centrality. Most importantly, we considered that compliance with editorial guidelines can be taken as a measure of organizational commitment, leading us to assume that journalists will strive to perform as prescribed to them.

Considering our research questions, we coded the documents using three categories we formulated: Documentation, Content, and Interaction. In the Documentation category, we assessed how the documents consider multiplatform journalism. The Content category examined the different formats and digital possibilities being explored. The Interaction category evaluated the recommendations for content moderation and responsiveness.

Nine more fine-grained indicators were then defined as follows. For Documentation: General Principles, Strategic Planning, and Transparency. For Content: Content Available, Content Warnings, and Content Display. For Interaction: Moderation, Responsiveness, and Digital Platform Interaction. The information about these indicators was coded according to their availability on the guidelines, whether it was included or not, and how consolidated, general, or superficial it was presented (Table 1). It is important to note that some of these aspects may be regulated by laws and other legal or regulatory texts rather than within the broadcasters' documents, for example, content warnings. Thus, the absence of such provisions in the analyzed documents does not necessarily mean that there are no provisions at all.

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[2] ARD is an umbrella organization of nine regional public broadcasters rather than an individual broadcaster and thus differs from the other organizations included in this sample. However, because of joint activities of these broadcasters at the nationwide level, such as a joint video-on-demand-platform, we found strategy documents suited for this analysis.

Table 1. Description of Analysis Categories and Indicators.

Documentation: How multiplatform journalism achieves centrality and prominence within the documents			
Indicator	*Guide Question*	*Possible answers*	*Aim*
General Principles	Does the editorial and strategic document discuss principles for multiplatform journalism?	Yes, in a separate document (on journalism)	To identify the centrality and prominence that the organization upheld for multiplatform journalism.
		Yes, as part of a document covering broader issues	
		No	
	If the corporation has any text that discusses multiplatform journalism, this might qualify as:	Consolidated with detailed guidelines	To identify the degree of general principles for multiplatform journalism in the organization.
		Relatively superficial with generic principles and guidelines	
		Very superficial with brief and rare mentions	
		Not applicable	
		Other	
Strategic Planning	Does the organization have in its documents a plan or a strategy for the development of multiplatform journalism?	Yes, in a separate document (on journalism)	This indicator reveals whether the organization incorporated or intends to incorporate multiplatform journalism practices.
		Yes, as part of a document covering broader issues	
		No	
		Other	
	About the existence of a Strategic Plan, if the answer is "yes," this can be qualified as:	Yes, consolidated with detailed guidelines	This indicator reveals the degree of strategic planning for multiplatform journalism.
		Yes, relatively superficial with generic principles and guidelines	
		Yes, but very superficial with brief and rare mentions	
		Not applicable	
		Other	
Transparency	Has the organization published any	Yes, consolidated with detailed guidelines	This indicator considers whether the

	indications/recommendations for editorial transparency about multiplatform journalism?	Yes, relatively superficial with generic principles and guidelines	organization has transparency standards for multiplatform journalism, sharing information and mitigating possible violations during professional practice.
		Yes, but very superficial with brief and rare mentions	
		No	
		Other	

Content: How different formats and digital possibilities have been explored by multiplatform journalism

Indicator	Guide Question	Possible answers	Aim
Content Available	Does the document indicate whether the broadcasted journalistic content should be available online?	Yes, consolidated with detailed guidelines	To measure how much the organization has used the different platforms to make content available.
		Yes, relatively superficial with generic principles and guidelines	
		Yes, but very superficial with brief and rare mentions	
		No	
		Other	
Content Warnings	Does the document indicate that the on-demand content should contain warnings and guidance (about violent, upsetting, and impactful content?)	Yes, consolidated with detailed guidelines	To identify whether the organization is concerned with protecting the users.
		Yes, relatively superficial with generic principles and guidelines	
		Yes, but very superficial with brief and rare mentions	
		No	
		Other	
Content Display	Does the organization have a document that states how its online content should be	Yes, consolidated with detailed guidelines	To indicate whether the organization has set up rules on how

Indicator	Guide Question	Possible answers	Aim
	displayed? e.g., prominence or quotas, given to a specific genre (such as news), up-to-dateness, accessibility (e.g., for disabled people), rules for displaying advertisements (if applicable)	Yes, relatively superficial with generic principles and guidelines	online content should be displayed to achieve specific goals related to ethical practices such as accessibility and possible content regulations.
		Yes, but very superficial with brief and rare mentions	
		No	
		Other	

Interaction: What are the recommendations for digital platform interaction, content moderation, and responsiveness

Indicator	Guide Question	Possible answers	Aim
Moderation	Has the organization published any guidelines or mechanisms on content moderation?	Yes, consolidated with detailed guidelines	To identify the organization's standards for user-generated content moderation.
		Yes, relatively superficial with generic principles and guidelines	
		Yes, but very superficial with brief and rare mentions	
		No	
		Other	
Responsiveness	Has the organization published any guidelines or mechanisms for responsiveness to user comments?	Yes, consolidated with detailed guidelines	To assess whether the organization incorporates responsiveness to the public.
		Yes, relatively superficial with generic principles and guidelines	
		Yes, but very superficial with brief and rare mentions	
		No	
		Other	
Digital Platform	Has the organization published guidelines on interaction on digital platforms?	Yes, consolidated with detailed guidelines	To indicate the organization's concern about interacting with

		the public through digital platforms.
	Yes, relatively superficial with generic principles and guidelines	
	Yes, but very superficial with brief and rare mentions	
	No	
	Other	

Note. Source: own presentation.

Editorial guidelines and documents made available by the broadcasters on their websites were analyzed. In some cases, such as the BBC, the annual plan outlines the strategy. In other cases, such as TVE, no strategy document was found. Again, the transparency and availability of documents on public broadcasters' corporate websites is a limitation of this research since no attempts were made to request them where we could not find them. However, we argue that the public availability of such strategic and editorial documents fulfills the requirement for PSM to be open to public scrutiny, and their online availability was assessed by our research design.
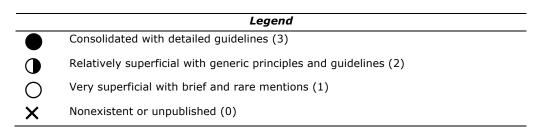
The second step of coding involved interpreting the data and identifying core practices, roles, and recommendations. The coding was carried out in August 2022 with the data available then. We intended to observe congruences and divergences between the countries analyzed to identify a possible framework for multiplatform journalism from these organizations and practitioners' guiding documents.

Results

The results showed that, except for the Brazilian case, at least one of the three categories analyzed was identified in each broadcaster's documents. Table 2 summarizes the results, ranked by performance. Each level of achievement, on a scale of four increments, corresponds to a value ranging from 3 (more developed) to 0 (not fulfilled at all). The values for all 11 categories were summed up to obtain a number corresponding to a broadcaster's performance.

Table 2. Summary of Results of 11 Broadcasters Listed by Performance.

	General principles	Strategic Planning	Transparency	Content Available	Content Warnings	Content display	Content Moderation	Comments Responsiveness	Interaction	Total
BBC	◑ 2	● 3	● 3	● 3	● 3	● 3	● 3	✕ 0	● 3	23
ABC	◑ 2	◑ 2	✕ 0	○ 1	✕ 0	● 3	● 3	● 3	● 3	17
ARD	● 3	● 3	◑ 2	✕ 0	◑ 2	○ 1	● 3	○ 1	◑ 2	17
ZDF	● 3	◑ 2	◑ 2	✕ 0	◑ 2	◑ 2	○ 1	○ 1	◑ 2	15
RTP	◑ 2	● 3	○ 1	◑ 2	○ 1	◑ 2	◑ 2	✕ 0	○ 1	14
RTVE	◑ 2	✕ 0	○ 1	◑ 2	◑ 2	● 3	◑ 2	✕ 0	○ 1	13
CBC	◑ 2	● 3	✕ 0	○ 1	✕ 0	○ 1	○ 1	◑ 2	○ 1	11
France TV	○ 1	✕ 0	✕ 0	✕ 0	○ 1	✕ 0	● 3	○ 1	● 3	9
SABC	◑ 2	○ 1	✕ 0	◑ 2	✕ 0	✕ 0	○ 1	○ 1	◑ 2	9
PBS	◑ 2	✕ 0	○ 1	✕ 0	○ 1	✕ 0	✕ 0	○ 1	○ 1	6
TV Cultura	○ 1	● 3	✕ 0	○ 1	✕ 0	✕ 0	✕ 0	✕ 0	✕ 0	5

Legend

●	Consolidated with detailed guidelines (3)
◑	Relatively superficial with generic principles and guidelines (2)
○	Very superficial with brief and rare mentions (1)
✕	Nonexistent or unpublished (0)

Looking at the overall results, we can group the broadcasters into three segments. The first contains the BBC alone, which scored 23 of 27 possible points (BBC, 2022, n.d.). The second comprises broadcasters that meet at least two-thirds of the criteria, ranging from 11 to 17: ABC, ARD, ZDF, RTP, RTVE, and CBC. The bottom group, with nine points or less, consists of France TV, SABC, PBS, and TV Cultura.

Discussion

The ranking shown in Table 2 suggests that our hypothesis is confirmed. This indicates that PSMs with a solid track record of investment and centrality in the media landscape perform better in terms of transparency and comprehensiveness of guidelines for multiplatform journalism.

The first and last broadcasters encapsulate this argument in the ranking. The BBC is an organization that "often leads in technological innovation," also given its unique positioning as a public broadcaster with global reach (Michalis, 2022, pp. 525–26; see also Donders, 2019), while TV Cultura suffers from the fact that "broadcasting in Brazil has practically been built on a combination of political control and limited regulation" (Matos, 2013, p. 80) and does not seek large audience numbers from its position given its educational mission (Bolaño & Brittos, 2016; Fundação Padre Anchieta, 2018b, 2018a). In the Brazilian context, public media do not have support for the development of multiplatform journalism guidelines.

According to our methodology, ABC and CBC, both classified in the second segment, find themselves in a similar context, albeit confronting divergent prospects (ABC, 2019a, 2019b, 2019c, 2020, 2021, n.d.). Australia and Canada have recently enacted laws requiring digital platforms such as Google and Facebook to remunerate media companies for the distribution of journalistic content. This has opened up opportunities for new revenues. Nonetheless, these measures have not been sufficiently proven. In 2023, the CBC announced its intention to reduce its workforce by 600 positions in response to financial constraints and budgetary challenges (CBC/Radio-Canada, 2022, 2021, 2019a, 2019b, n.d.). In the case of ABC, a 28% decline in actual funding has occurred since the mid-1980s, according to a company report (ABC, 2023). However, an increase in revenue for the corporation has been outlined in the federal budget for the upcoming years, as announced in the report (ABC, 2023).

The two German organizations analyzed, leading the second segment of our ranking, have consolidated and detailed guidelines for multiplatform content in general, including journalism (ZDF and ARD), related to PSM content offered on third-party platforms. These documents specify a legal regulation: Article 32 of the Interstate Media Treaty states that German PSM must justify distributing online content outside their on-demand platforms. With these documents, ARD's nine regional broadcasters and ZDF set the rules for such content (ARD, 2019, 2023; ZDF, 2022). Following a legal reform in 2019, these specifications became necessary, allowing all German PSM to produce content exclusively for third-party platforms such as Facebook, YouTube, TikTok, or Instagram if this is necessary for journalistic-editorial reasons to reach a specific target group. These detailed legal requirements for activities on third-party platforms are not surprising, given that a legalistic tradition more strongly permeates the German broadcasting system and the political debate on PSM than in other countries (e.g., Serong, 2017).

Despite operating in one of the largest media markets in Europe, French PSM, classified in the third segment of our ranking, has been characterized as lagging in terms of the cultural change needed to transition from "broadcasters to communication media" (Kuhn, 2019, p. 81). Moreover, although the transparency of organizational matters and documents has increased recently, the involvement of the public in the PSM system in France remains somewhat limited (Kuhn, 2018). These factors may contribute to the position of France TV in our comparison, with the lowest overall score compared with the other European broadcasters studied (France Télévisions, 2021, n.d.a, n.d.b, n.d.c, n.d.d).

SABC, also in the third segment, has a long history, having been established in 1936. However, its modernization is relatively recent. For most of the 20th century, the corporation was characterized by the contradiction of pursuing the principles of a public broadcaster while being immersed in the political context of apartheid and responding to the demands of an authoritarian state (SABC, 2020, 2022, n.d.b, n.d.a). "Only in the early 1990s, the issue of the democratization of the public broadcaster arose as a constitutive element of the overall democratization process that was taking place in South African society as a whole" (Ciaglia, 2017, p. 830). In recent years, SABC has experienced an intense financial crisis that threatens its sustainability. This results from a confluence of factors, including management problems, rising costs, declining TV audiences, heavy evasion of TV license fees, and budget cuts by Parliament. The corporation acknowledged most of these problems in a statement released in 2023 (SABC, 2023).

The PBS case is peculiar because of its highly decentralized structure, emphasizing the fragmentation of numerous affiliated local stations. This characteristic ultimately affects PBS's performance and its role in the transition from the public broadcaster model to the public media model, a transition that occurs primarily at the level of member stations in the American model (PBS, 2019, 2018). As Martin (2021) explains,

> This lack of unified strategy wasn't necessarily a major challenge in traditional broadcast days in that local public media had a greater ability to create close audience relationships. Nevertheless, as audiences have transitioned to more centralized online platforms, the old system dynamics have increasingly been inverted. (p. 6)

To address RQ1 (*Does multiplatform journalism achieve centrality and prominence in the editorial guidelines of selected public service media? Which reasons can be indicated for its variance?*), we noted—based on the data within our sample—a significant level of variance of centrality and prominence of multiplatform journalism in the editorial guidelines we analyzed, most of which can be explained in terms of the degree of development and consolidation of each broadcaster. In other words, multiplatform journalism achieves more centrality and prominence in the editorial guidelines of those PSM that have already achieved a higher level of development and consolidation.

Apart from our ranking, which was applicable to support the confirmation of our hypothesis about RQ1, we highlight general characteristics derived from the comparative research design to provide answers to RQ2 and RQ3.

All 11 broadcasters met at least one indicator for the documentation of multiplatform journalism, while none published a document dedicated exclusively to multiplatform journalism. This topic often appears in general documents about digital content, presence on third-party platforms, or standards for journalistic practice. Furthermore, the documents generally provide standards for informative content across all media outlets but do not specify directives for exploring multiplatform content. Additionally, there is no specific strategic planning document for multiplatform journalism.

To address RQ2 (*How have these media explored different formats and digital possibilities through multiplatform journalism, and how can possible divergences and convergences between them be explained?*), the data indicate a general lack of clear and substantial directives for exploring multiplatform journalism, which may have hampered experimentation with formats and possibilities. In other words, exploring formats and digital possibilities is a practice that has probably not been adequately led by editorial guidelines. The apparent limitation of this argument is that experimentation can naturally occur without any related, specific directive provided by editorial guidelines. Notwithstanding, given the relevance of guidelines in determining the trajectory of PSM in line with its public remit, the shortage of clear and comprehensive directives is concerning because of its potential consequences for slowing actual practices of multiplatform journalism, possibly affecting the overall performance of the PSM.

The lack of available documents dedicated exclusively to detailing guidelines specifically for multiplatform journalism can be considered an obstacle to fulfilling the PSM mission on several fronts: the need to know how to find and select relevant information in information-rich environments (Strömbäck et al., 2022); the integration between different media outlets and formats to support a better navigation and consumption experience (Castro et al., 2018); the importance of providing content fostering the perception that different interests can be nationally unified around shared imaginaries (Bos et al., 2016; Sørensen, 2020; van Es & Poell, 2020); and the clarity of which content production and availability strategies are used to satisfy different preferences (Sehl, Cornia, & Nielsen, 2018).

With respect to RQ3 (*What are the recommendations for digital platform interaction, content moderation, and responsiveness provided by those media, and how can we explain possible differences in depth and comprehensiveness between them?*), our study produced mixed results, suggesting partial confirmation of our hypothesis. The BBC, situated alone in the first segment according to our methodology, and two of the broadcasters grouped in the second segment (ABC and ARD) achieved the best performance in content moderation and responsiveness. However, other companies in the second segment (ZDF, RTP, RTVE, and CBC) provided guidelines for content moderation, although they were relatively superficial (RTP and RTVE) or very superficial (CBC/Radio-Canada, n.d.; ZDF and CBC; RTP, 2021a, 2021b, n.d.; RTVE, n.d.a, n.d.b, 2023; ZDF, 2022, 2024, n.d.). In the third segment, SABC and TV Cultura did not meet any indicators in this category, similar to PBS at the national level (with better results on a regional basis).

Conclusions

Our analysis shows that the availability of strategic documents outlining rules and concepts for PSM multiplatform journalism varies considerably among the organizations studied. The data suggest the confirmation of our hypothesis, mainly for RQ1, meaning that the more developed and consolidated a public

service medium is, the more transparent and thorough its guidelines for multiplatform journalism would be. Such an assumption may be corroborated by the different technological environments in which these PSM operate: Some organizations under study might still operate in the experimental or consolidation phase of digital technology, while others might have already reached the maturity phase (see Donders, 2019, for a description of these phases). RQ2 could not be tested, as we found no clear strategic plans for exploring the formats and digital possibilities of multiplatform journalism. For RQ3, we found mixed results related to our hypothesis, suggesting partial confirmation. More qualitative research is needed to better understand the many aspects involved.

Moreover, digital news environments are changing rapidly, which means that strategies can also change rapidly. However, in the context of ongoing global discussions about accountability, transparency, data protection, and digital sovereignty in multiplatform environments, the lack of publicly available detailed information on many of the indicators studied for most broadcasters seems striking. This is also related to when, how, and why to apply on-site and off-site strategies (Sehl et al., 2018).

We might conclude that many of the broadcasters we studied are failing, albeit to varying degrees, to unpack the platform imaginaries (van Es & Poell, 2020) that underlie their digital operations. Multiplatform environments arguably pose significant challenges to the traditional public service remit: The impact of algorithms, personalized interfaces, social networks, and data infrastructures calls for a reconceptualization of the argument for the universalism of PSM (Savage, Medina, & Lowe, 2020; Sørensen, 2020).

If public service broadcasters are to move forward in providing a public open space (Thomaß, 2020) or a public service Internet (Fuchs & Unterberger, 2021), this reconceptualization and redefinition is crucial. As we argue in this article, this would require more transparency about the assumptions, strategies, definitions, and rules that PSM applies in digital news environments. Of course, being transparent with the public presupposes that PSM organizations themselves have clear and well-defined strategies and policies for meeting the challenges of the digital age, even if only for internal use. Assessing the extent to which this is the case, particularly in the context of a constantly and rapidly changing technological environment, could be an exciting avenue for future research.

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        104.html

Appendix. List of Documents.

Broadcaster / references	Country	Type of document	Title	Link
TV Cultura (Fundação Padre Anchieta, 2018a)	Brazil	Editorial Guidelines	Diretrizes do Conselho Curador da Fundação Padre Anchieta para a programação jornalística de suas emissoras – Abril de 2017	https://tvcultura.com.br/upload/fpa/iniciativas/201803071 45549_diretrizes-para-a-programac-a-o-jornali-stica-da-fundac-a-o-padre-anchieta.pdf
TV Cultura (Fundação Padre Anchieta, 2018b)	Brazil	Strategic	Bases para a Elaboração do Plano Estratégico de Ação da Fundação Padre Anchieta	https://tvcultura.com.br/upload/fpa/iniciativas/201803071 45644_anexo-1-bases-para-o-planejamento-estrategico-da-fpa.pdf
RTP (RTP, n.d.)	Portugal	Editorial Guidelines	Guia Ético e Editorial da RTP	https://cdn-images.rtp.pt/mcm/pdf/e72/e72f275f3d2a2a813d953aa6 abdd2da41.pdf
RTP (RTP, 2021a)	Portugal	Strategic	Linhas de Orientação Estratégica 2021–2023	https://media.rtp.pt/empresa/wp-content/uploads/sites/31/202 1/01/LINHAS-DE-ORIENTACAO-ESTRATE%CC%81GICA-14-janeiro-2021.pdf
RTP (RTP, 2021b)	Portugal	Strategic	As Mãos on Presente os Olhos no Futuro Projeto Estratégia RTP 2021–2023	https://media.rtp.pt/empresa/wp-content/uploads/sites/31/201 8/05/Plano-Estrategico-RTP-2021.pdf
TVE (RTVE, n.d.a)	Spain	Editorial Guidelines	Estatuto de Información de la Corporación RTVE	https://www.rtve.es/contenid os/documentos/ESTATUTO_DE_INFORMATIVOS_v1.pdf
TVE (RTVE, n.d.b)	Spain	Editorial Guidelines	Documento: Principios Básicos de la Programación de RTVE	https://www.cgtrtve.org/files/Principios_basicos_de_la_pr ogramacion_de_RTVE.pdf
TVE (RTVE, 2023)	Spain	Editorial Guidelines	Áreas de actividad RDTVE Digital	https://www.rtve.es/rtve/20 230715/areas-actividad-rtvees/942160.shtml
BBC (BBC, n.d.)	UK	Editorial Guidelines	Editorial Guidelines	http://www.bbc.co.uk/editori alguidelines

BBC (BBC, 2022)	UK	Strategic	BBC Annual Plan 2022/23	https://www.bbc.co.uk/about thebbc/documents/bbc-annual-plan-2022-2023.pdf
France TV (France Télévisions, n.d.a)	France	Editorial Guidelines	Charte des antennes	https://www.francetelevisions.fr/groupe/nos-engagements/charte-des-antennes-93
France TV (France Télévisions, n.d.b).	France	Editorial Guidelines	Charte d'éthique	https://www.francetelevisions.fr/groupe/nos-engagements/charte-dethique-47
France TV (France Télévisions, n.d.c).	France	Editorial Guidelines	Charte Déontologique de France Info	https://www.francetvinfo.fr/charte-deontologique.html
France TV (France Télévisions, n.d.d).	France	Editorial Guidelines	Charte de Modération	https://www.francetelevisions.fr/groupe/confidentialite/chartes-et-engagements/charte-de-moderation-97
France TV (France Télévisions, 2021)	France	Strategic	Rapport Annuel 2020	https://issuu.com/francetelevisions/docs/24_03_ftv_ra2021vf_sr_a218e1bf139b05
ARD (ARD, 2023).	Germany	Strategic	ARD-Selbstverpflichtungserklärung	https://www.ard.de/die-ard/ARD-Selbstverpflichtung-2023-Ausblick-100.pdf
ARD (ARD, 2019)	Germany	Editorial Guidelines	Richtlinien für die Verbreitung von SWR-Telemedien über Drittplattformen	https://www.swr.de/unternehmen/organisation/richtlinien-fuer-die-verbreitung-swr-telemedien-ueber-drittplattform-100.pdf
ZDF (ZDF, 2022)	Germany	Strategic	ZDF-Selbstverpflichtungserklärung	https://presseportal.zdf.de/fileadmin/zdf_upload/Aktuelles/2022/selbstverpflichtungserklaerung-2021-100.pdf
ZDF (ZDF, n.d.)	Germany	Editorial Guidelines	Richtlinien für die Verbreitung von ZDF-Telemedienangeboten über Drittplattformen	https://www.zdf.de/assets/rechtsgrundlagen-interne-vorschriften-richtlinie-100~original

ZDF (ZDF, 2024)	Germany	Editorial Guidelines	ZDF-Nettiquette	https://www.zdf.de/service-und-hilfe/netiquette-104.html
ABC ABC, 2021)	Australia	Strategic	ABC Content Plan—2021–22	https://live-production.wcms.abc-cdn.net.au/957d7acc9c9ebcce58ce5bda90a25493
ABC (ABC, 2019a)	Australia	Strategic	ABC Content Plan—2019–20	https://live-production.wcms.abc-cdn.net.au/5ba3523fb087710f9c88b7a78e3206b7
ABC (ABC, 2019b)	Australia	Strategic	Diversity & Inclusion Plan 2019-22	https://live-production.wcms.abc-cdn.net.au/8a2fd0412b47a3f48445cccc0b47a353
ABC (ABC, n.d.)	Australia	Editorial Guidelines	Editorial Policies—Editorial Policies 2022	https://www.abc.net.au/edpols/policies/
ABC (ABC, 2019b)	Australia	Strategic	Elevate Reconciliation Action Plan July 2019—June 2022	https://about.abc.net.au/reports-publications/abc-reconciliation-action-plan-rap-2019-22/
ABC (ABC, 2020)	Australia	Strategic	ABC Five-Year Plan 2020–2025	https://live-production.wcms.abc-cdn.net.au/184691a2792e6341c2ae8e5d5cbe945d
CBC (CBC/Radio-Canada, 2019a)	Canada	Strategic	2019–2024 Strategic Plan	https://site-cbc.radio-canada.ca/documents/vision/strategy/2019-strategic-plan-en.pdf
CBC (CBC/Radio-Canada, 2019b)	Canada	Strategic	Canada's Communications Future: Time to Act—Final Report 2020	https://ised-isde.canada.ca/site/broadcasting-telecommunications-legislative-review/en/canadas-communications-future-time-act

CBC (CBC/Radio-Canada, 2022)	Canada	Strategic	CBC/Radio-Canada's Corporate Plan Summary 2022–2023 to 2026–2027	https://site-cbc.radio-canada.ca/documents/vision/strategy/corporate-plan/corporate-plan-summary-2022-2023.pdf
CBC (CBC/Radio-Canada, 2021)	Canada	Strategic	Our Culture, Our Democracy: Canada in the Digital World – 2019	https://www.newswire.ca/news-releases/our-culture-our-democracy-canada-in-the-digital-world-cbc-radio-canada-submits-its-recommendations-for-modernizing-canada-s-culture-legislation-818927077.html
CBC (CBC/Radio-Canada, n.d.)	Canada	Editorial Guidelines	Journalistic Standards and Practices	https://cbc.radio-canada.ca/en/vision/governance/journalistic-standards-and-practices
PBS (PBS, 2018)	USA	Editorial Guidelines	PBS Editorial Standards & Practices, 2018	https://www.pbs.org/about/producing-pbs/editorial-standards.pdf
PBS (PBS, 2019)	USA	Editorial Guidelines	PBS Producer's Handbook 2019	https://bento.cdn.pbs.org/hostedbento-prod/filer_public/Producing%20for%20PBS/Handbook%20Drafts/PBS%20Producer's%20Handbook%20(December%202019).pdf
SABC (SABC, 2020)	South Africa	Editorial Guidelines	SABC Editorial Policies 2020	http://web.sabc.co.za/digital/stage/editorialpolicies/SABC_Editorial_Policies_2020.pdf
SABC (SABC, n.d.a)	South Africa	Strategic	SABC Corporate Plan 2020/2021-2022/2023	https://static.pmg.org.za/SABC_Corporate_Plan.pdf
SABC (SABC, 2022)	South Africa	Strategic	Rise up SABC! Annual Report 2021	http://web.sabc.co.za/digital/stage/corporateaffairs/SABC_Annual_Report_2021_-_2022.pdf
SABC (SABC, n.d.b)	South Africa	Strategic	Improvement in the SABC's Internal Control Environment	https://www.sabc.co.za/sabc/improvement-in-the-sabcs-internal-control-environment