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BBC Radio and public value: The governance of public service radio in the United Kingdom

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Abstract

Between 2007 and 2017 in the United Kingdom, BBC radio services were regulated by the BBC Trust, with the performance of BBC radio stations monitored against the so-called 'drivers of public value'. Utilizing the *Reach, Quality, Impact and Value for Money* performance framework (RQIV), periodical reviews of BBC Radio Service Licences were carried out. This article considers two such reviews, of BBC radio stations in Northern Ireland, Scotland and Wales, and BBC Local Radio services in England. The use of the public value approach in the governance of public service radio in the United Kingdom is assessed. It is argued that the public value approach places a serious focus on audience responses, but that the use of the RQIV framework is problematic when considering the cultural nature of broadcasting. It is suggested that the BBC is increasingly being forced to make decisions for political-economic reasons, rather than for reasons of public value.

Keywords: public service radio; public value; BBC Radio; radio regulation; media governance; audience research.

Introduction

The BBC Trust was responsible for regulating BBC public service radio services in the United Kingdom since 2007 until it was replaced as the BBC's regulator by Ofcom in 2017. Utilizing its *Reach, Quality, Impact* and *Value for Money* Performance Framework (RQIV),¹ the BBC Trust monitored the performance of BBC services against these so-called 'drivers of public value' (BBC 2004; BBC Trust/Coyle 2012). In this article, two of the BBC Trust's Service Licence reviews (periodical assessment reviews) held between 2011–12 are examined, exercises that were carried out to review the BBC's nations radio stations in Northern Ireland, Scotland and Wales (BBC Trust 2011) and BBC Local Radio services in England (BBC Trust 2012). The use of public value approaches in the governance of the BBC is set into a wider theoretical context, with a particular focus on the governance of public service radio in the United Kingdom.

A communications policy analysis (Hansen et al. 1998: 66–90) is conducted in this article to examine how the regulatory system functioned under the BBC Trust, to assess how BBC radio contributes to public value, and to facilitate a discussion on the way in which public service provision is secured in the context of arguments for greater market liberalization in broadcasting. Taking a qualitative documentary analysis approach (Atkinson and Coffey 2004; Mason 2002), the BBC Trust's use of evidence in the Service Licence reviews will be discussed, where the Trust draws on both qualitative and quantitative data. While the actual content of what the Service Licence reviews produced is of interest in this article, the primary focus is on how the RQIV framework itself has functioned in relation to radio. In conclusion, it is first argued that the public value approach takes audience perceptions into account in a manner that is

unparalleled in the commercial radio sector. Second, it is argued that the reliance on quantitative data over qualitative data in the Service Licence reviews is problematic, when measuring a cultural entity such as public service radio. Third, it is suggested that the BBC is increasingly being forced to make decisions for political-economic reasons, rather than for reasons of public value.

BBC Radio in context

The context for the BBC Trust's Service Licence reviews for radio audiences is that these reviews had the means to have a direct impact on the form and content of BBC services, changing quotas for programming, hours of service, or emphasis of approach. The reviews provided a direct link between the audience and the BBC Trust, which in turn made decisions on the scope and scale of BBC radio services. As is shown, these reviews considered large and representative samples of the audience for BBC radio, radio services that remain dominant within the wider radio industry in the United Kingdom. For example, BBC radio services have a 54.4 per cent share of listening hours of all radio in the United Kingdom (Ofcom 2015a: 236). The BBC national station with the highest audience reach, BBC Radio 2, reaches 28.4 per cent of adults in the United Kingdom weekly (Ofcom 2015a: 226). However, despite the international reputation and domestic reach of stations such as BBC Radio 1 and BBC Radio 4, only 16 per cent of the television licence fee (£653m) is spent on radio (BBC 2015a: 4). While the funding for these stations comes from the *television* licence, semantically this delinks funding of BBC radio from the funding mechanism for all public service media, which may have the effect of lessening awareness of how these services are funded among the public. Indeed, this comparatively small funding (in the context of the BBC's wider services) delivers 54 BBC radio stations (ten network (UK-

wide) stations; five ‘nations’ stations serving Scotland, Wales and Northern Ireland; and 39 local stations serving England).²

Approaches to media governance

Media governance is a concept that attempts to take account of the way in which media systems are planned, implemented and assessed by a range of actors at various levels, and which ‘covers all means by which the mass media are limited, directed, encouraged, managed, or called to account’ (McQuail 2003: 91). The term ‘media governance’ has emerged with the wider development of a theory of governance (Bevir 2010), and is one that includes media policy and regulation within it but is wider than a study of each (Moe 2010: 208). In one of the dominant framings of governance within media policy studies, Freedman terms media governance ‘the sum total of mechanisms, both formal and informal, national and supranational, centralized and dispersed, that aim to organize media systems according to the resolution of media policy debates’ (2008: 14). The theoretical ground for the subject was considerably enriched by Puppis’ contribution, arguing for example that ‘few contributions in communication science have involved conceptual groundwork or substantive discussion of theoretical underpinnings of governance’ (2010: 134). Puppis later arrived at the following definition: ‘*media governance as the regulatory structure as a whole, i.e., the entirety of forms of rules that aim to organize media systems*’ (Puppis 2010: 138, original emphasis).

The governance of broadcasting in the United Kingdom since the 1980s has been marked by a series of policy decisions by successive governments including deregulation, marketization, the maintenance and entrenchment of competition, and the adaption to and shaping of audio-visual convergence through the telecommunications

industry (Freedman 2008; Hardy 2012; Hesmondhalgh 2013: 121ff.; Humphreys 1996). There has been the slow dismantling of the notion of public service and a growing requirement for the justification of publicly funded media through the employment of market logic (Syversten 2003; Tracey 1998). Potschka frames these developments historically, stating: ‘Whereas socio-political concerns dominated media policy-making until the 1980s, the emergence of neoliberalism as the ruling global orthodoxy shifted the main impetus towards the economic regulation of broadcasting markets’ (2012: 11).

Potschka further outlines how market-driven politics (eg. Leys 2001) became the major driving force in broadcasting policy-making in the period 1979–90 (Potschka 2012: 86ff.). Post-1990, Potschka postulates a move from *broadcasting policy* to *communications policy*, a period that lasted up to 2003. The period that remains is marked by the application of the concept of public value to public service media regulation, and Ofcom’s market regulatory role as the United Kingdom’s main communications regulator. Ofcom has a remit to govern in the interests of both citizens and consumers (Lunt and Livingstone 2012). While in place since 2003, taking on the full regulatory duties for the BBC from 2017 onwards has significantly increased the complexity and scale of its work.

The governance of public service radio in the United Kingdom

Within the wider governance system for media in the United Kingdom, radio takes up a comparatively minor part in the system. This is despite the enduring popularity and large audience reach of the medium. For example, in 2014, radio reached 89.5 per of the UK population who listened for 21.4 hours per week on average (Ofcom 2015a: 211). However, compared to a focus on television and increasingly on the

Internet, radio features little in the work of the regulatory institutions comprised of the Department for Culture, Media and Sport (DCMS), Ofcom and the BBC Trust. Moreover, there has been a dearth of research on radio policy, and where it has occurred it has been carried out by a relatively small group of scholars. Research on policy issues in radio has not been entirely overlooked (eg. Lax 2012; Lunt and Livingstone 2012: 163–76), but much recent work has been on digital radio (Ala-Fossi et al. 2008; Hendy 2000a; Lax et al. 2008; Lax 2014; O’Neill 2008). One can point to work such as that by David Hendy on the role of BBC Radio 1 as a public service radio station (Hendy 2000b), or to Dubber’s (2013) *Radio in the Digital Age* that deals in part with policy, but as compared to research on policy issues related to television or the Internet, there has been little scholarly attention.

The system for the governance of public service media in the United Kingdom is planned and implemented at the national level (Ramsey 2015), and continues to be so. While this system has long been under criticism, especially since devolution to Wales, Scotland and Northern Ireland in the late 1990s, there is no current suggestion that the model might be changed. In the governance system for public service radio up to 2017, the three main regulatory institutions have been the DCMS, Ofcom and the BBC Trust. DCMS is responsible for setting the overall policy agenda through legislation (Communications Act 2003), digital switchover plans (DCMS 2014), and measuring the UK radio sector’s contribution to the creative industries and the growth of the digital and creative economy (DCMS 2015a). Ofcom has been responsible for measuring how radio in the United Kingdom contributes to the public service media system (PSM) (2014a), in line with its wider and more substantial work on the regulation of television. It monitors the scale and reach of BBC radio services, commercial radio services and community radio services, and also monitors the

progression of digital radio (Ofcom 2014b), and is responsible for technical radio standards (Ofcom 2015b).

As the BBC's main regulator between 2007 and 2017, the BBC Trust was responsible for setting strategy in the area of radio, measuring performance, handling complaints and ensuring value for money. The BBC's 2006 Royal Charter gave the BBC Trust responsibility for setting Service Licences for each BBC service – including all of its radio services – and reviewing these periodically (the analysis here focuses on two such Service Licence reviews). The BBC Trust also had the responsibility for conducting public value tests (PVTs), which were used when a major change was proposed to the BBC's services (most recently used in the case of BBC Three's move from being a linear television channel to being an online-only service). PVTs were made up of a Public Value Assessment (conducted by the Trust itself), and a Market Impact Assessment (MIA) conducted by Ofcom.

Public value

The concept of public value comes primarily from the work of Mark Moore, whose work at Harvard University in the 1990s led to the influential text *Creating Public Value* (1995). Public value is a concept that is variously applied as a management approach, an outcome, or a 'a set of processes that organisations could/should/ought to pursue' (Gray 2008: 210). Theoretically, it was argued that 'the aim of managerial work in the public sector is to create *public* value just as the aim of managerial work in the private sector is to create *private* value' (Moore 1995: 28, original emphasis). Moore contended that the private sector used information more effectively to assess past performance, while public agencies were by contrast lacking

in this regard. Public value is an approach – when the theory is actualized in practice – which allows public sector organisations to focus ‘more on program evaluation and less on policy analysis’ (Moore 1995: 35), an area in which Moore argues they have been weak.

Moore’s public value rests on the notion that public organizations should ‘meet three broad tests’: first, ‘be aimed at creating something substantively valuable’, second, ‘be legitimate and politically sustainable’, and third, ‘be operationally and administratively feasible’ (Alford and O’Flynn 2009: 173). Focusing on how the term appeared out of a trajectory of management-speak, Lee et al. (2011) note that it is used ‘to refer to any benefits – social or cultural – deemed to be outside of the purely economic’ (Lee et al. 2011: 289), whereby public value has remained as something of a nebulous category (Williams and Shearer 2011). Benington (2009), himself a collaborator with Mark Moore, highlights a similar facet, where for him the term sometimes functions ‘as a broad portmanteau phrase expressing ideals and aspirations about public service, but capable of meaning many different things to different people’ (Benington 2009: 233). However, Benington’s contention is that our understanding of public value ought to go ‘beyond market economic considerations, and also encompasses ecological, political, social, and cultural dimensions of value – all that adds value to the public sphere’ (2009: 237).

Influential in spreading the theory of public value to the United Kingdom was a 2002 discussion paper published by the UK Government’s Cabinet Office under Tony Blair’s New Labour (Kelly et al. 2002). It was argued in the paper that public value ‘provides a rough yardstick against which to gauge the performance of policies and public institutions, make decisions about allocating resources and select appropriate systems of delivery’ (Kelly et al. 2002: 4). The authors did acknowledge that the public

value approach in public services is contrasted to the New Public Management approach, where they remain ‘relatively faithful to Moore’s text in setting public value in opposition to NPM and of stressing the role of deliberation in preference formation’ (Lee et al. 2011: 291). Of particular relevance to this study, a number of arts and cultural organizations have used the framework of public value in aspects of their work. For example, Gray (2008) has addressed the use of a public value framework in the work of Arts Council England, but criticizes the lack of representativeness in the data the organization collected as part of a large project it conducted in 2006. In that work Arts Council England were seeking ‘to identify the “public value” that existed in their operations, and to use this as the basis for identifying how the management of their activities could be improved in the future’ (Gray 2008: 209). However, it is at the BBC that public value has been applied most prominently, and we turn now to analysis of the Corporation’s approach to the subject.

The BBC’s approach to public value and the RQIV framework

Building Public Value (BBC 2004) proved to be the key document outlining how the BBC would move to a new framework for measuring its contribution to society, in a way that would go beyond a focus on economic factors. In the document the BBC argued:

While commercial broadcasters aim to return value to their shareholders or owners, the BBC exists to create *public value*. In other words, it aims to serve its audiences not just as consumers, but as members of a wider society, with programmes and services which, while seeking to inform, educate and entertain audiences, also serve wider public purposes. Public value is a measure of the

BBC's contribution to the quality of life in the UK. (BBC 2004: 7–8, original emphasis)

In continuing to eschew a solely market-based approach, the BBC instead envisaged that using the concept of public value would ensure that broadcasting would not be 'reduced to just another commodity, with profitability the sole measure of worth' (Grade 2004 in BBC 2004: 3). It was argued that 'Broadcasting is a civic art. It is intrinsically public in ambition and effect' (BBC 2004: 6).

In *Building Public Value*, the Corporation set about to question how public value might be measured within the context of the BBC's services:

The public value of a public service has three components: Value to people as *individuals*. [...] Value to society as a whole – to people as *citizens* [...] Impact on the performance of the wider commercial market – its *net economic value*. [...] Public value is the sum of these three elements. (BBC 2004: 29, original emphasis)

Beginning with the first component, the BBC argued that individual value can be measured by reach, quality and impact (which later form the first three principles of the RQIV framework). Measuring citizen value is referred to as an attempt by the BBC to find a way of assessing what the BBC contributes to society – such as in the case of social cohesion – through its services. Thus for example, the document refers to 'the contribution that the BBC can make to building trust and tolerance between the UK's different cultures through comedies like *Goodness Gracious Me*' (BBC 2004: 45), an iconic drama focusing on the experiences of British Indians. The measurement of

economic value is referred to by the BBC as being ‘relatively straightforward’, where for example market impact is concerned (BBC 2004: 45–46).

Later, the BBC Trust would return to a lengthy theoretical treatment of public value in a report written by Diane Coyle (with Christopher Woolard), in a discursive form unusual within Trust documentation (BBC Trust/Coyle 2012). The publication aimed to establish the Trust’s understanding of public value and how it was being applied, which saw the authors reporting on the BBC Trust’s experiences of the complexity of the process and outlining some of the obstacles that were faced in doing so. For example, they noted that problems can arise as ‘citizens have a diminishing amount of trust in a wide range of institutions, in decision-makers who would in the past have been respected and seen as independent, in the political process and in statistics’ (BBC Trust/Coyle 2012: 50). As a result, when the BBC Trust made decisions that were often controversial based on public value approaches – such as the later decision to move BBC Three online – it did so in the wider context of a mood of ‘public cynicism’ (BBC Trust/Coyle 2012: 50).

The BBC’s framing of public value was actualized into the RQIV framework. This framework was intended to apply an evidence based approach, both quantitative and qualitative, to measuring whether or not BBC services were contributing to public value, specifically through the delivery of the Corporation’s public purposes (BBC 2004: 15). As already noted, RQIV was drawn from the three-fold principles that are employed to measure public value for individuals, citizens and to the economy. Under RQIV, the following approach was then implemented into the following fourfold framework:

1. Reach – this was understood as a measurement of ‘the BBC’s role of universal availability and equity – delivering something for everyone’ (Day 2008), and

thus the extent to which BBC services were accessed by the public was charted across a range of quantitative factors and compared to relevant indicators. For example, in one of the Service Licence reviews considered in this research, the weekly audience reach for BBC Radio Wales of 19 per cent was found to be ‘lower than Radio 1 and Radio 2 in Wales and broadly in line with Radio 4’ (BBC Trust 2011: 3). However, as an example of how such a figure was interpreted by the BBC Trust, the review went on to give the context that BBC Radio Wales was only available on FM to a little more than two-thirds of Welsh households, compared to near universal coverage for the network BBC stations. As such, the Trust did not treat the measurement of Reach crudely, but rather attempted to deal with it in a more nuanced way.

2. Quality – this measurement was based upon audience perceptions of quality, through for example the collation of appreciation ratings for the different programmes offered by a particular service. For example, in the Trust’s Service Review for the nations stations the audience’s appreciation for drama, entertainment and religious programming offered by BBC Radio Scotland was measured (such as those drawn from ‘BBC audience surveys such as the pan BBC tracking survey (PBTS) or the online Pulse survey’ (BBC Trust 2011: 29–30, 35). Another way of measuring quality is through measurements like audience perceptions of ‘Programmes that could not easily be replaced’ (BBC Trust/Kantar Media 2011a: 19), an audience measurement used to establish the extent to which BBC programmes could not be replicated by other broadcasters.

3. Impact – this was concerned with ‘the need to be memorable, challenging and engaging, and supportive of the BBC’s purposes’ (Day 2008). Here measurements such as attitudinal responses to ‘BBC Radio Wales has programmes that I want to listen

to' (BBC Trust/Kantar Media 2011b: 17) were used to gauge the extent to which the audience agreed that the BBC was meeting such goals.

4. Value for money – alongside cost-per-listener-hour of production, as compared to other services, audiences were surveyed for their responses of whether certain services are perceived as being good value for money. For example, the following question was posed:

Out of the £145.50 licence fee, around £1.31 a year is used to fund BBC Radio Scotland. Thinking specifically about how your licence fee is spent, please tell me whether or not you feel BBC Radio Scotland is good value for money? (BBC Trust/Kantar Media 2011c: 77)

Critical approaches to the BBC's use of public value

The BBC's use of the public value framework has come under a range of academic attention and criticism, and in particular the BBC's use of the PVT has attracted sustained academic attention (eg. Donders 2012; Moe 2010; Potschka 2012). In addition, substantial edited collections on the subject of public value and public service media more generally have been produced (Donders and Moe 2012; Lowe and Martin 2014). The UK PVT, a form of *ex ante* evaluation, was the first of its kind in Europe (Donders 2012: 29), with the concept spreading to other countries across the continent (where in Germany, for example, it has informed the German Three-Step test) (Collins 2011). A legal backdrop to this is the European Commission's 2009 Communication on the matter of state aid and public service media, an update of a 2001 Communication (Biggam 2012; European Commission 2009).

In one of the foremost critiques of public value at the BBC, Lee et al. (2011) argued that the adoption of public value into the Corporation can be viewed as a historical product of the conditions that the Corporation was then operating under: ‘Given the inconsistency with which it was deployed, even in its heyday, it seems clear that the BBC’s use of public value was primarily opportunistic’ (Lee et al. 2011: 293). This concurs with the view that the BBC introduced the concept of public value ‘at a time of multiple challenges to the BBC – challenges shared by public service broadcasters generally’ (Collins 2007: 168), such as the classic threats to PSB of falling legitimacy and perceptions of quality. And yet, thirteen years after *Building Public Value*, the BBC has been operating under this framework continually, while the submissions by the BBC Trust and the BBC Executive to the Charter Renewal process used both the discourse and approach of public value.

Collins’ nuanced critique of the BBC’s adaption of public value argues that elements of Moore’s account were not transported into the BBC’s version, where it ‘detached the notion of public value in broadcasting from its origins’ (2007: 182). For Collins, Moore’s concepts of co-production and contestation are both not fully developed in the BBC’s public value account, as each is in part antithetical to the principles upon which the BBC rests. Finally, Freedman’s (2008) concern is that public value is not suitable for being applied to broadcasting, drawing on an argument from James Harkin that ‘public value cannot be measured quantitatively without lapsing into absurdity and is, therefore, of much more limited use than the theory of value that is used to analyse the market economy’ (Harkin 2005 in Freedman 2008: 157). Later this point is returned to when the limits of the public value approach to radio are considered.

Service licence reviews

In this section, BBC Trust Service Licence reviews for the BBC's nations radio stations in Northern Ireland, Scotland and Wales (BBC Trust 2011) and BBC Local Radio services in England (BBC Trust 2012) are considered. Such five-yearly reviews were central to the work of the Trust, the outcomes of which could lead to changes to the Service Licences of the stations (those documents that govern the parameters for BBC radio services). They set stipulations for remit, aims and objectives for that particular service, how the service would deliver against the BBC's public purposes (BBC Trust 2017), and outlined particular quotas on certain types of programming (eg. BBC Trust 2013). The specific BBC radio services that were under scrutiny in these two reviews are: BBC Radio Ulster/Foyle,³ BBC Radio Scotland, BBC Radio Wales and BBC Local Radio (e.g. BBC Radio Cambridgeshire, BBC Radio Leeds, BBC Radio Sheffield). Excepted from this analysis of these reviews are BBC Radio nan Gaidheal and BBC Radio Cymru, the BBC's services in Gaelic and Welsh respectively, as they have no obvious comparisons.

BBC Trust's research methodology and approach to data

The research that underpins the Service Licence reviews is both quantitative and qualitative in its nature, with the BBC Trust relying on private sector research organisations to carry out the work. Quantitative research for Northern Ireland, Scotland and Wales was in each case based on 500 telephone interviews, with results weighted in line with the demographics of the listeners for each station (BBC Trust/Kantar Media 2011a, 2011b, 2011c). Qualitative data was collected through the collection of written surveys with open responses (BBC Trust/Public Knowledge 2011a, 2011b, 2011c).⁴ For BBC Local radio in England, 1300 listener responses were

collected quantitatively (alongside 75 interviews, conducted with listeners from selected stations), and fourteen focus groups were conducted (BBC Trust/Jigsaw Research 2012: 3). An additional 8904 survey responses were also collected to augment the data (BBC Trust/Public Knowledge 2012).

In the Service License reviews considered here, listeners to BBC radio were asked about their responses to between 23 and 29 priorities/or attributes in relation to their attitudes on how the BBC is delivering on its public purposes.⁵ A performance gap was then calculated for each response, which measures the gap between how important an attribute is perceived to be and how well the relevant radio station has performed on it. The focus here is on the results of only one of the six public purposes, ‘Sustaining citizenship and civil society’. This public purpose states ‘You can trust the BBC to provide high-quality news, current affairs and factual programming that keeps you informed and supports debate about important issues and political developments in an engaging way’ (BBC Trust 2007: 1). This public purpose is selected for focus for the following reasons: while the public purposes are not ranked by priority, this purpose is arguably the most central to the work of the BBC, and strongly reflected in the radio services under review here; radio remains a significant source of news, as measured in Ofcom’s data, where radio in Northern Ireland, Scotland and Wales as a source of local and national news vies for the second most significant source with newspapers and the Internet (eg. Ofcom 2014c: 53).

By way of methodological approach, this research addresses the seven attributes that audiences in Northern Ireland, Scotland and Wales are asked about in relation to the sustaining citizenship and civil society public purpose, six of which are directly comparable. For Northern Ireland audiences, there was one distinct question, while audiences in Wales and Scotland were asked one question that audiences in Northern

Ireland were not (see Table 1). When comparing the eight attributes that audiences for local radio in England were asked about in relation to this public purpose, five of them are directly comparable with those questions asked to audiences in the other nations.

Performance gaps for the citizenship purpose

An analysis of the performance gaps for the citizenship purpose for nations radio show that all three nations stations perform adequately on these ratings (Table 1), where performance gaps are mostly within a range that is not significantly negative.⁶ That BBC Radio Ulster/Foyle had only one significantly negative performance gap – on the extent to which the station covers the Republic of Ireland – is extremely noteworthy given the historical social and political conditions in the region, where the BBC has long been a source of division and argumentation (Butler 1995; Ramsey 2016). The station’s weekly audience reach of 36 per cent of the population is the highest audience reach of any BBC nations or network radio service (Ofcom 2015c: 52), showing that its importance as a source of information in the Northern Ireland public sphere is disproportionately high.

For BBC Radio Scotland, the two significant negative performance gaps both related to coverage of the United Kingdom, rather than Scottish issues per se. Drawing on the qualitative data, the BBC Trust noted in relation to the broader concerns about the station:

Some of these respondents argued that that Radio Scotland lacks impartiality and suggested that news coverage is biased against the Scottish National Party. Although this is certainly a strongly held view among some listeners, our

research indicates that this view is not representative of the station's audience as a whole. (BBC Trust 2011: 39)

During the Scottish independence referendum of 2014, the impartiality of the BBC's coverage came under intense scrutiny. While this is a point that Ofcom as the BBC's new regulator could address, the point made here, however, serves to underline the BBC Trust's use of the qualitative data to augment the quantitative.

For BBC Radio Wales, the three significantly negative performance gaps were in relation to the quality of news, trust in impartiality, and like BBC Scotland, on the attribute 'Helps understanding of UK wide politics'. These ratings did not unduly concern the BBC Trust, with it concluding that 'Radio Wales makes an important contribution to the BBC's public purposes particularly in relation to news and topical issues in Wales, coverage of national events, music, sport and culture' (BBC Trust 2011: 3). Finally, there was only one significantly negative performance gap identified for BBC Local Radio in England, on the extent to which the stations 'Provides high quality journalism' (see Table 2). The Trust concluded that: 'Our evidence from the public consultation and audience research shows us that, on the whole, audiences believe that Local Radio is meeting these aims' (BBC Trust 2012: 28). However, here, the Trust very strongly relied on the quantitative data on which to judge that BBC Local radio is delivering in this area.

Table 1: Performance gaps for the ‘Sustaining citizenship and civil society’ public purpose for BBC nations stations, as a percentage.

Attribute	BBC Radio Ulster/Foyle			BBC Radio Scotland			BBC Radio Wales		
	Performance	Importance	Gap	Performance	Importance	Gap	Performance	Importance	Gap
1. High Quality News	92	95	-3	91	92	-1	88	94	-6
2. Trust to provide impartial news	87	91	-4	88	93	-5	86	94	-8
3. Provides better understanding of news and topical issues in (country)	89	91	-2	86	91	-5	93	92	+1
4. Provides better understanding of news and topical issues in the UK	76	81	-5	76	83	-7	77	80	-3
5. Provides better understanding of news and topical issues in the ROI	56	67	-11	-	-	-	-	-	-
6. Helps understanding of UK-wide politics	66	69	-3	66	74	-8	66	72	-6
7. Helps understanding of politics in (country)	75	77	-2	74	78	-4	76	81	-5
8. ‘coverage of news and current affairs has got me talking about them’	-	-	-	72	75	-3	81	83	-2

Sources: BBC Trust/Kantar Media 2011a, 2011b, 2011c.

BBC Trust’s use of qualitative and quantitative data

As discussed, both qualitative and quantitative data were collected for these reviews. For the Nations review (BBC Trust 2011), quantitative factors are overwhelmingly relied on, with the qualitative public consultation appearing to play a fairly minor role in the conclusions that were reached. In this review there was a strong focus on the quantitative performance gaps, alongside additional data sets that the BBC Trust used, such as from Radio Joint Audience Research (RAJAR), and audience approval and appreciation indexes. While quantitative data were also heavily relied upon for the Local Radio review (BBC Trust 2012), there seems to be a greater balance with qualitative data than in the Nations review. Here the public consultation data are apparently drawn on much more readily, including the use of quotations from individual audience members to support conclusions.

Table 2: Performance gaps for the ‘Sustaining citizenship and civil society’ public purpose for BBC Local Radio, as a percentage.

Attribute	Performance	Importance	Gap
1. Provides high quality journalism	75	81	-6
2. I trust it to provide impartial news	80	83	-3
3. Gives me a better understanding of news and topical issues in my local area	85	86	-1
4. Gives me a better understanding of UK-wide news and topical issues	67	69	-2
5. Helps me understand politics and decision-making in my local area	66	71	-5

Source: BBC Trust/Jigsaw Research (2012).

The wider implications of public value for the BBC

While this article has up to this point focused specifically on the BBC Trust's use of public value in the governance of BBC radio stations, this section considers the wider implications of the use of the public value approach for the BBC, with a discussion of the merits and demerits of the use of the public value approach.

First, the approach used to assess public value in the Service Licence reviews places a serious focus on audience response to the BBC radio stations that they are being served by, a process that is without equal in the commercial radio sector in the United Kingdom. Through this process the audience are afforded the opportunity to directly influence the shape of BBC services, which accords with their status as licence fee payers. In so doing, very significant amounts of audience data have flowed back to the BBC and the BBC Trust from these exercises, and also inform one-off exercises such as PVTs and Charter Reviews. This chimes with Moore's (1995: 35) original contention, previously discussed, that public sector organizations hitherto lacked data when it came to evaluating their programmes, but that public value approaches help rectify this. On this basis, the BBC Trust was able to make clear judgements on services that were under review, and set requirements for the BBC Executive to comply with. In fact, despite the many problems with the current management and policy direction of the BBC and its governance, these have surely not stemmed from a lack of audience research.

From the perspective of this data-rich position, the BBC can make significantly robust claims about the efficacy of its services. In the assessment of the sole public purpose considered here, from the quantitative ratings alone we have seen that there is high audience support for BBC radio services on the citizenship purpose among the audience. Even where there are statistically significant performance gaps, they are few

in number and still small in relative terms. The fact that stations in Northern Ireland, Scotland and Wales had between 88–92% performance ratings on the delivery high quality news and journalism and local radio in England had a 75% rating, is significant. Moreover, that ratings for impartiality range from 80–88% for performance of delivery across the four constituencies is worthy of note, especially in the current climate of criticism that the BBC is biased from the press (eg. Booker 2015). However, the three significantly negative performance gaps across these two measurements show that there is room for improvement among these BBC radio stations.

Second, and returning to Freedman’s point (2008: 157), the extent to which the RQIV framework relies on quantitative data is problematic when considering the cultural nature of broadcasting, which in our case is the citizenship purpose of radio, encompassed within a broader cultural impact. For Freedman, it is precisely the nature of such a use of data in measuring public value that presents the clearest obstacle to assessing public service media, where he states the ‘enormous amounts of data [...] are far better suited to an understanding of broadcasting as a straightforward economic, rather than a complex social and cultural, practice’ (Freedman 2008: 157).

The public value approach perhaps is most logical when complemented by the MIAs that are carried out by Ofcom. However, these were normally only employed if a new BBC service is being proposed, and thus did not feed into the radio reviews considered here. As was shown above, the role of the qualitative cannot be discounted entirely from the assessment here, and to paint the RQIV process as solely quantitative would be disingenuous. That said, it is unclear the extent to which this is important within the framework, an issue that deserves further research and which is more difficult to assess through the use of a documentary analysis approach alone. Moreover, there are questions that must be raised in relation another part of methodology of the

BBC Trust's reviews. Here the point is in relation to the nature of the questions that are asked, and accordingly, the type of responses that are elicited. For each of the attributes considered in this research, in relation to performance and importance, the statements that respondents are asked to judge upon are couched positively rather than negatively, or neutrally. For example, on the fourth attribute considered here, as part of the Nations review, respondents did not have it indicated to them what they were comparing the attribute to (BBC Trust/Kantar Media 2011b: 81).

Third, while the BBC Trust is regulating for public value, the Corporation is increasingly being forced to make decisions for political-economic reasons, which removes the emphasis from the Royal Charter that states that the 'BBC exists to serve the public interest' (DCMS 2006: 2). Instead it has increasingly been required by government to serve the public on a rapidly diminishing funding stream, while maintaining its reach, its breadth across a range of services and the quality of its programming. The current situation means that the BBC can only measure the public value that is being generated from its current funding, radically reduced again in July 2015 with the hasty agreement with government on the level of the licence fee and what it is required to fund (DCMS 2015b). This reduction may entail a drop in income as large as from £3.7 billion to £3.1 billion per year (BBC/NAO 2015: 25).

There is a sense that the requirement to regulate for public value, and to measure the public value generated, is failing even on the very logic upon which it is predicated. The construction of technical measurement frameworks like RQIV is only effective if the case made is then accepted by Government, if for example a strongly evidential case has been made on a particular point. The utilization of qualitatively and quantitatively data-driven arguments presupposes that the government is open to evidence-based policy-making within broadcasting, and willing to accept the case when

it is clearly presented. For example, a flurry of publications in the Summer and Autumn of 2015 (such as BBC's main submission document for Charter renewal – *British, Bold, Creative* [BBC 2015b], and the *Life without the BBC* study [BBC/MTM 2015]) made the empirical case for the BBC as being popular, impactful, funded by a mechanism that is largely supported by the public, making a positive and important economic contribution through licence fee spending in the wider economy, and widely supported on measurements of impartiality and trustworthiness (see also BBC/PWC 2015; BBC 2015c). The evidence base here was so overwhelmingly strong that the BBC should have entered the Charter review period of 2015–16 safe in the knowledge that renewal was secure.

Instead the BBC and by extension the BBC Trust (up to its replacement by Ofcom as the BBC's regulator) has been under substantial and sustained pressure. The case against the BBC is led by a wide coalition of politicians, other broadcasters, the right-wing press and free-market think-tanks, who ensure that the case against the BBC is anything but evidence based, and is instead marked by arguments redolent of moral panic, such as the one that the BBC stifles markets and that the imposition of the licence fee removes choice and is thus illiberal. For example, while ITV plc (the main owner of Channel 3 television licences) has no assets in radio, its Chief Executive Adam Crozier gave evidence to a UK Parliamentary committee in December 2015 suggesting that merging BBC Radio 4 and 5 Live, and selling BBC Radio 1 and 6 Music were among the cost saving options the Corporation could consider (Crozier in Culture, Media and Sport Committee 2015). Moreover, the Corporation is continually required to defend the role of its main popular music radio stations BBC Radio 1 and 2 in the face of criticism, from, on the most recent occasion, the government itself (Boaden 2015).

Conclusion

The BBC Trust's use of the public value framework for regulating BBC radio services has not been unproblematic. As has been outlined here, there are particular drawbacks in the use of quantitative data, while the wider concept of regulating for public value is being squeezed by the broader political and economic conditions that the Corporation is operating under. This article has sought to draw those strands together under an assessment sensitive to actually existing practices and ideological pressures. That said, the RQIV approach has been the incumbent method for assessing how BBC radio services are performing, and in so doing it has provided a significant evidence base to show that audiences value BBC radio content. This is particularly important for establishing that public value is being created. While the public value assessment framework remains in place, it is important to subject it to scrutiny, drawing attention to the way it generates and uses data. However, such a strong evidence base may not be enough to ward off threats to BBC radio services, which continue to appear to be low-hanging fruit for the Corporation's main critics, and thus prime targets for cutbacks at the BBC. With Ofcom taking over as the BBC's regulator, it remains to be seen how it will approach regulation of BBC radio. Future research in radio studies should be directed towards this area, both to compare Ofcom's approach to the work carried out under the BBC Trust, and to further develop the literature on radio policy in the United Kingdom. Additional benefit would come from comparative studies of media systems in different national contexts, building on that work that has looked at the application of public value approaches across Europe.

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Notes

¹ RQIV is sometimes referred to as QRIV, but the difference in acronym does not signal a change in approach.

² The ‘nations’ radio stations are: in Wales, BBC Radio Wales and BBC Radio Cymru; in Scotland, BBC Scotland and BBC Radio Nan Gaidheal; in Northern Ireland, BBC Radio Ulster/Foyle. The figure of 54 stations does not include BBC Radio Foyle as a separate station, and does not count BBC Radio Shetland and BBC Radio Orkney, which are opt-out stations of BBC Radio Scotland.

³ BBC Radio Foyle is comprised of part-retransmission of BBC Radio Ulster, part-original programming targeted at the population of Derry, Northern Ireland’s second largest city, and the region surrounding it.

⁴ Qualitative response numbers: Northern Ireland: 190; Wales: 325; Scotland: 630.

⁵ The BBC’s public purposes are a set of themes that BBC services must deliver on. At the time of this study, they were: Citizenship; Nations, regions and communities; Representing the United Kingdom, its nations, regions and communities; Global; Digital.

⁶ Measurements of performance and importance are conducted using a 7-point likert-style scale. Only those gaps over 5 per cent are deemed by the BBC Trust to be statistically significant.