

BBC draft operating licence consultation response

Dr. Marina Dekavalla, Senior Lecturer in Journalism, University of Sussex (individual response), 17 July 2017

*Do you agree with our overall approach to setting the operating licence?*

I agree overall. As acknowledged at different points in the consultation document, the public purposes are qualitative in nature, and as such cannot be fully translated into a set of quantitative conditions. Still, the regulatory conditions seem to set reasonable, measurable targets regarding quantity and investment in different types of programming, which can form the basis of the BBC's work on maintaining the qualitative requirements. Ofcom's periodic reviews and the BBC's own annual reporting should engage extensively with audiences through quantitative and qualitative approaches to ensure not only that audiences are generally satisfied, but also that what they expect under each purpose informs how this is understood and implemented.

*Do you agree with the approach we have proposed for public purpose 1, including the high-level objectives and regulatory conditions we are proposing?*

Yes, although purpose 1, like the other purposes, also includes terms that are open to interpretation (highest standards, highest calibre, depth of analysis, impartial) and in-depth engagement with audience expectations is again important. Research by Ofcom and/or the BBC into how audiences understand, for example, impartiality may also be useful in informing practice. Both my own\* and other academics' research on television news content suggests that impartiality tends to be currently implemented mainly as balance between opposing claims/sides, particularly in the coverage of divisive political issues. Understanding what exactly audiences expect in such contexts might usefully inform how it is approached.

*Do you agree with the approach we have proposed for public purpose 3, including the high-level objectives and regulatory conditions we are proposing?*

Yes, I agree. The emphasis placed on qualitative assessment under this purpose in the consultation document is understandable and appropriate, but this could also expand to other purposes (especially purposes 1 and 4).

*Do you agree with our proposed overall approach to performance measurement?*

Analysis of actual broadcast content (other than number of hours produced) has a rather marginal position in both Ofcom's and the BBC's interim plan proposals.

*Do you agree with the proposed framework of: availability; consumption; impact; contextual factors*

Yes, together the components of the framework cover all areas. However, all in-depth analysis (content analysis, qualitative consultation of audiences, expert opinion) is planned only on an ad-hoc basis, which could limit the breadth of the framework.

*Do you agree with Ofcom's approach to how we will set and amend the performance measures?*

Yes, I agree

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\* For instance, Dekavalla, M. Issue and game frames in the news: Frame building factors in television coverage of the 2014 Scottish independence referendum. *Journalism*. <http://journals.sagepub.com/doi/full/10.1177/1464884916674231> ;  
Dekavalla, M. and Jelen-Sanchez, A. Whose voices are heard in the news? A study of sources in television coverage of the Scottish independence referendum. *British Politics*. <https://link.springer.com/article/10.1057/s41293-016-0026-4>