BAI STRATEGY STATEMENT 2017-2019
A REVIEW

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April 2020
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APPENDIX – BAI ACTIVITY REPORT
1 EXECUTIVE SUMMARY

The 2017-2019 Strategy Statement is the third statement since the establishment of the BAI as the independent regulator for television and radio broadcasters in Ireland in 2009. The strategy sets out the objectives and functions of the Broadcasting Authority for the forthcoming period and includes the requirement for a review of the efficiency and effectiveness of the Statement during the preceding three-year period. In the context of this review the BAI commissioned Ipsos MRBI to undertake research among all relevant stakeholders, both internal and external stakeholders, to obtain broad views on the efficiency and effectiveness of the Strategy Statement, with particular emphasis on the strategic objectives.

The review of the 2017-2019 Strategy Statement was undertaken via a quantitative online survey among the stakeholder group, supported by qualitative workshops undertaken to better explore the views of the external stakeholder groups. The survey was hosted on Ipsos MRBI’s secure network. All respondents were invited to participate using either an English or Irish language version of the survey. Using this self-completion approach all respondents reviewed each element of the Strategy Statement including the Vision, Mission, Values and Strategic Objectives. The survey design facilitated a quantification of responses among the diverse range of stakeholders and ensured a comprehensive, consistent and focused assessment of all the informational aspects of the review. In total, 168 responses were achieved representing a very positive response rate.

Following the initial quantitative phase two qualitative workshops were convened among stakeholders to further explore their experiences with the BAI in relation to the 2017-2019 Strategy Statement. Ipsos MRBI facilitated these workshops which utilised a deliberative approach leading with an initial top-line presentation of the quantitative survey results followed by a round table discussion revolving around the strategic objectives.

BAI’s Vision, Mission and Values

The BAI’s Vision for 2017-2019 was encapsulated into a concise statement – “An Irish media landscape that reflects and shapes who we are” and, broadly stakeholders perceive a significant level of achievement of that vision - nine in every ten believe the vision to have been achieved at least in part and half of all stakeholders believe the BAI has substantially or achieved its vision in full. Only one in ten believe the BAI has underachieved in this regard. Feedback in terms of how the BAI could have better achieved its vision included a range of themes such as BAI’s potential role as an advocate for the sector, a vision that better reflects the ‘new’ multi-national and multi-cultural Ireland, one that reflects the needs of younger audiences in the digital space and one that fosters diversity of content while protecting the local voice. An issue that runs throughout this research relates to the sustainability of the sector and the need for support to better compete with digital providers, currently operating outside the Irish regulatory environment.
In the context of the BAI’s Mission, which comprises distinct goals, the survey measured the perceived relevance of these goals for the forthcoming three-year period. Promoting plurality of voice, fostering diversity of content and fostering and supporting broadcasting are perceived as goals which will be more relevant for the future, by up to 75% of the stakeholder group. These findings build on the reflections emerging in the earlier section. In terms of regulation, while almost half believe this will be more relevant in the future, a further two-in-five believe its relevance will be the same as currently. Regulation is broadly accepted as a core component of the BAI’s role.

The BAI’s values - to be Fair (in processes, procedures and decisions), Independent (operating as an impartial regulator), Expert (by informing through engagement, research and commitment to professional learning) and Accountable (in decisions, governance and resources) - are ones which BAI believes are embedded in the organisational culture and operational activities. In general, across all stakeholder categories, the BAI is associated to a very significant degree with each of its values – between 88% and 95% of all stakeholders associate the BAI at some level with each one. In particular, the BAI performs most strongly in terms of being Fair and being Independent – over 60% of stakeholders strongly associate the BAI with these values and a further one-third somewhat associate them.

When asked to reflect on goals or values to be included in the future strategy, once again feedback related to an ambition to reflect the ‘new’ multi-cultural Ireland and to support the sustainability of the industry. Supporting news integrity and quality journalism and striving for greater transparency in decision making also emerged in this context.

**BAI’s Strategic Objectives**

The Vision, Mission and Values of the Authority are reflected in a series of twelve strategic objectives organised within five broad themes. Each objective was assessed in turn, with information on the intended outcomes and key actions undertaken by the BAI provided, to facilitate an objective assessment by stakeholders. Thus, a measure of achievement and relevance for the future was captured.

The first theme – *Promoting Diversity and Plurality* – contained four objectives and while the BAI achieves a relatively strong performance across these objectives, with upwards of 80% of stakeholders perceiving they were met at least in part, the BAI performs most strongly on the issue of *increasing the production and availability of culturally relevant audio visual content for Irish audiences* – the second most highly rated objective across all twelve measured.
Relatively low levels of underachievement emerged here, but on this criterion, the BAI performs less well in terms of fostering a media landscape that is representative of and accessible to the diversity of Irish society. While more than four-in-five rated the objective has being achieved at least in part, a minority of stakeholders, 17%, perceive the BAI to have underachieved here. In terms of relevance for the future, plurality of voice and having a representative and accessible media to the diversity of Irish society are rated in the top 5 in terms of continued relevance for the future. However, discussions during the stakeholder workshops reveal some concerns that the diversity issue, while recognised as very relevant, is superseded by the more immediate concerns around the sustainability of the sector, generally.

For the second series of objectives, within the theme of Achieving Excellence and Accountability, on two of the three objectives measured the BAI’s performance score is rated in the top 3 across the board and, specifically on the issue of regulation- to achieve a responsible and accountable broadcasting sector, – the BAI achieved its highest score overall, a significant achievement in terms of delivering on a core function of the organisation. While more than three in five stakeholders believe these objectives will be more relevant for the future, during more detailed discussions on the issue of regulation, broadcasters want to see a more equitable regulatory environment which includes global digital media players. These stakeholders have expressed the concern that legislation will not keep pace with the growth in the digital space.

The theme Communicating and Influencing contains one single strategic objective, one that is rated highest of all in terms of relevance for the future. While half of all stakeholders perceive the BAI as having substantially achieved this objective, placing it in the top 5 in terms of achievement, a small proportion (15%) perceive the organisation to have underachieved on this criterion. Views on promoting public debate were discussed in the qualitative workshop forum and there is recognition that a strong, reliable and effective media is critically important now, at a time when stakeholders perceive that indigenous media is under threat from unregulated global content and commentators. To promote this vision, stakeholders believe the BAI should be the independent voice and public face of the sector, to advocate for the industry and proactively promote discussion around any emerging issues.

The fourth theme, Empowering Audiences has a single objective to develop the understanding, engagement and participation of the public in media and this objective has emerged in the top 3 in terms of perceived relevance for the future strategy period. On this objective, 44% rate the BAI as having achieved this objective in full/substantially and a further 38% achieved in part. Stakeholders believe the BAI should engage more with the public and the industry at large, to build awareness of the BAI’s role and the role of broadcasters in the media context. While the initiatives already in place are recognised as valuable in the effort to promote awareness of media issues there is a sense that more resources are needed to maximise the success of these initiatives.
On the final theme – **Enhancing Innovation and Sustainability** – while the BAI is perceived to have performed relatively well in terms of **encouraging creativity and innovation**, it has performed less well on the objective of **working with stakeholders to support the achievement of greater sustainability for the sector**. This objective emerged in the **top 3** in terms of relevance for the future strategy but was in the **bottom 3** in terms of achievement scores. While 36% perceive the objective was achieved in full/substantially, and another 36% believed it was achieved in part, one-in-five stakeholders rated the BAI as having underachieved on this aspect.

This issue, sustainability of the sector, was the most critical issue as expressed by all stakeholders during the qualitative phase and it is the concern that affects and colours every other aspect from their perspective. Current funding schemes designed to support the industry, such as the Sound and Vision scheme (although criticised by some because of perceived bureaucratic barriers), are recognised as valuable and indeed essential funding opportunities for both broadcasters and content creators, in their efforts to deliver and broadcast quality, Irish produced, content. However, there is a perception that more funding is needed.

The fundamental issue, and the priority for broadcasters, is one of survival and protecting commercial revenues for Irish broadcasters in a globalised media environment. The regulatory environment, which currently excludes global digital media companies, is perceived as inequitable, putting Irish broadcasters at a severe disadvantage, and furthermore, in the era of fake news, is seen as a threat to the integrity of quality journalism and broadcasting.
2 BACKGROUND & OBJECTIVES

The 2017-2019 Strategy Statement is the third statement since the establishment of the BAI as the independent regulator for television and radio broadcasters in Ireland in 2009. The strategy sets out the objectives and functions of the Broadcasting Authority and of the Contract Awards and Compliance Committees for the forthcoming period.

The 2017-2019 Strategy Statement was informed by a comprehensive review of the previous three-year strategy, based on an extensive consultation with stakeholders. The strategy was implemented in a period of continuing change in the broadcast environment, with a proliferation of broadcast platforms and increased competition from international broadcast markets and from on demand services. While audience measurement research indicates that Irish broadcast media continues to attract large scale audiences in Ireland, the availability of an increased range of broadcast content and services is, nonetheless, changing consumption patterns in Ireland.

Against this backdrop, the BAI’s Vision, as declared within the current Strategy Statement (2017-2019), is for an Irish media landscape that reflects and shapes who we are. The Vision aims to recognise the distinctive cultural and linguistic heritage of Irish people while embracing the diversity of Irish society. The vision, mission and values of the Authority are reflected in a series of strategic objectives organised within five strategic themes and the statement clearly identifies the expected outcomes by 2019, in relation to each objective.
The Broadcasting Act 2009 stipulates the inclusion in the Strategy of a review of the efficiency and effectiveness of the Statement during the preceding three-year period. In the context of this review the BAI commissioned Ipsos MRBI to undertake research among all relevant stakeholders including BAI staff, members of the Compliance and Contract Awards Committees, members of the Authority, other stakeholders in the broadcasting and related industry sectors and interest groups, government departments and members of the general public.

The requirements of the research were specified in terms of the following objectives.

- To obtain broad stakeholder views on the efficiency and effectiveness of the existing BAI Strategy Statement, with emphasis on the BAI’s strategic objectives.
- To gather stakeholders’ experience and views of the operations of the BAI, with regard to the stated objectives, over the past three years.
- To gather stakeholder views on a range of topics relevant to the development of enhanced or new strategic objectives for the next three years.

Ipsos MRBI also conducted research into the review of the 2014-2016 Statement in 2016. This research informed the methodology adopted for this current review as detailed in the next section.
3 METHODOLOGY

The review of the 2017-2019 Strategy Statement involved a broad consultation among BAI stakeholders, both internal and external stakeholders, and was undertaken via a quantitative survey among the stakeholder group, supported by qualitative workshops undertaken to better explore the views of the external stakeholder groups.

3.1 The Stakeholder Quantitative Survey

The quantitative survey was conducted on-line utilising CAWI (computer aided web interviewing) methodology. The survey design facilitated a quantification of responses among the diverse range of stakeholders and ensured a comprehensive, consistent and focused assessment of all the informational aspects of the review. This replicates the methodology adopted for the review of the previous strategy in 2016 thus ensuring a continuity of approach.

The sample universe was identified by the BAI and comprised the following stakeholder categories.

- BAI Authority and Committee members – current and past members
- BAI Staff
- Public service broadcasters (PSB’s)
- Commercial broadcasters and broadcast groups
- Community broadcasters
- Sound & Vision fund assessors
- Sound & Vision fund applicants
- Sponsorship and development funding applicants
- Archiving organisations
- Industry networks and interest groups and agencies
- Media organisations
- Government departments
- Suppliers and Consultants
- General public
Prior to the survey launch all stakeholders were contacted directly by the BAI to inform them of the upcoming Strategy Statement Review and to invite their participation in the research. All those contacted were given the option to decline. Furthermore, to broaden the scope of the potential respondent base and to facilitate access by members of the general public, a public notice was published on the BAI website. Following this initial consultation, an invitation via email was dispatched to each stakeholder directly from Ipsos MRBI which contained a secure link to the on-line survey. The survey questionnaire was scripted in both the Irish and English language and was designed for self-completion by respondents. Accessible versions of the questionnaire were made available where required. The survey was hosted on Ipsos’ secure network and all responses were collated here.

From a stakeholder list of c525 individuals, 168 completed interviews were achieved, representing a very satisfactory 32% response rate. This response rate is in line with that achieved in the 2016 survey when 167 stakeholders completed the interview, and once again reflects the positive level of engagement among stakeholders. Six interviews were completed in the Irish language. The survey achieved responses across all stakeholder categories.

The survey was conducted in the period from 27th November to 17th December 2019.

3.2 The Stakeholder Interview

The review comprised a self-completion questionnaire whereby stakeholders were invited to review all elements of the Strategy Statement including the Vision, Mission, Values and Strategic Objectives of the BAI. In the main, to ensure a systematic approach by all respondents, the interview comprised a range of questions with pre-coded, rating scale, answer options. There was also the opportunity to include an open, “unstructured” response at certain intervals throughout the survey. For these unstructured questions, there was a significant level of feedback provided and a wide variety of comments which adds additional insight to the quantitative questions.

When rating the strategic objectives, the intended outcomes by 2019, and the key actions taken by the BAI to support the achievement of those outcomes, were displayed on screen to provide all relevant background information to the respondent. A separate report on these key activities in 2019, the final year of its three-year Strategy Statement is provided by the BAI in Appendix - Part 2 of this report.
3.3 The Stakeholder Qualitative Workshop

Following the initial quantitative phase two workshops were convened among stakeholders to further explore their experiences with the BAI in relation to the 2017-2019 Strategy Statement. Ipsos MRBI facilitated these workshops.

The format was deliberative in nature leading with an initial presentation of the quantitative survey results. Following the short presentation an open table discussion, revolving around the strategic objectives, took place. This forum facilitated a deeper discussion around the issues experienced by stakeholders in relation to the key objectives and explored opinions as to the BAI’s performance on these criteria.

The issues discussed included the sustainability of the sector, the challenges experienced due to the rapidly changing media landscape and the relevance of the stated objectives for the future in this environment, all in the context of the perceived role and remit of the BAI in the sector.

The stakeholder workshops took place on 3rd and 4th March 2020.

NOTE ON REPORTING

In reporting the results of the Stakeholder Review, all findings are presented for the total sample of stakeholders who completed the survey and, to provide greater understanding across the various stakeholder categories, further analysed by relevant sub-segments of this whole. These sub-segments include internal stakeholders - BAI Associates (staff and committee members), and external stakeholders - Broadcasters (including all PSB, community and commercial broadcasters) and S&V/Grants/Sponsorship (including Sound and Vision fund applicants/assessors and sponsorship/development fund applicants). In the context of such sub-segments all other respondents, comprising a diverse range of stakeholder categories, are grouped together as “Other”.

The final sample composition contained the following responses across the stakeholder categories:

**Respondent Profile**

- **BAI Associates** (45) - 27%
- **Broadcasters** (57) - 34%
- **Sound & Vision/Grants/Sponsorship** (36) - 21%
- **Others** (30) - 18%
4 FINDINGS

To set the survey findings in context, the level of familiarity with the BAI Strategy Statement 2017-2019 was measured at the end of the interview.

The vast majority of respondents, (87%) claimed to be familiar at some level with the Strategy Statement and almost half “very familiar”. While naturally enough, familiarity was highest among those associated with the BAI, only 16% of external stakeholders are not familiar with the strategy statement. This suggests significant engagement with the BAI across the sector.

<table>
<thead>
<tr>
<th>Familiarity With BAI Strategy Statement</th>
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<tbody>
<tr>
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<tr>
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<tr>
<td>Not very familiar</td>
</tr>
<tr>
<td>Not at all familiar</td>
</tr>
<tr>
<td>Could not say</td>
</tr>
</tbody>
</table>

The first section of the interview addressed the BAI’s Vision, Mission and Values contained within the Strategy Statement, 2017 to 2019.

4.1 BAI’s Vision 2017-2019

“An Irish media landscape that reflects and shapes who we are”.

The BAI’s vision was encapsulated into this concise statement. The interview began by assessing the BAI’s performance in delivering on this vision. Using a prescribed rating scale, stakeholders’ perceptions of the vision were measured. The rating scale used to measure performance in this context was as follows and a “not sure” option was allowed for:

- Achieved in full
- Substantially achieved
- Achieved in part
- Under achieved
Broadly speaking, stakeholders perceive a significant level of achievement in terms of the BAI Vision – 9 in every 10 believe the vision has been achieved at least “in part” and half of all stakeholders perceive the vision to have been substantially achieved or achieved in full. A small minority, only 10%, believe the BAI has underachieved in the period of the strategy statement. Stakeholders in the Sound &Vision/Grants and Sponsorship group are marginally more critical on this aspect.

**BAI Vision Achieved**

For those who rated the BAI as having “achieved in part/under achieved” (49%) the following question was posed to them- “What could the BAI have done to better achieve its vision”? This was a spontaneous, unstructured, response question and, as such, while responses were very varied in their content, some themes emerged.

The first theme revolved around the BAI’s visibility as a regulator and the potential leadership role in the conversation around the Irish media landscape, its engagement with, and on behalf of the industry and the public. There were some suggestions that the BAI should be more visible in their support of the sector, thus raising awareness among the general public, and helping to raise the profile of the sector more generally. The quotes below illustrate.

“I think the BAI should be more visible and lead some of the conversation about the Irish Media Landscape, developments challenges, sustainability....”

“I think the BAI could have engaged more actively and directly with the Irish audio visual audience as a key stakeholder.”
The statutory remit and limitations on the BAI’s powers with regard to digital media also emerged in the commentary.

“The BAI achieved its vision insofar as broadcasting media is concerned. Due to the absence of power to tackle issues online, the vision could probably never truly be realised in the first place.”

The next theme emerging is the perception that the vision needs to better reflect the “new” Ireland with its growing mix of nationalities and cultures and to better represent minority groups in the country.

“I think the Irish media landscape still only represents a section of Irish society. It is a sizeable section but there are still some sections that are either under-represented or not represented at all.”

Questions around plurality and the concentration of ownership also emerged in this context with comments on how this is changing the media landscape. There is some concern that concentration of ownership could result in a loss of the local and community voice and a consequent loss in diversity of content.

“To me local means local and not being ultimately controlled from London.”

Other themes include the issue of engaging with younger audiences - to better understand and reflect their needs in a digital media environment, fostering a bigger variety of content, and protecting the rural voice and viewpoint. The BAI’s role in supporting the industry to better compete with digital audio and audio-visual providers operating in the market, but outside the regulatory environment of Irish Broadcasters, also emerged in this context. Furthermore, this latter issue – sustainability of the sector in a more global world, emerged as the most critical issue for stakeholders during the stakeholder qualitative workshops.

“The authority needs to be flexible to the needs of the people especially younger cohorts.”

“Irish broadcast media is largely concentrating on an older audience. The BAI’s potential role in regulating online platforms may provide for greater reach to younger and more diverse audiences.”

“Playing a more proactive role in levelling the regulatory playing field with digital media to enable more growth and innovation in the broadcasting sector.”

(Themes identified on the basis on 3 or more similar comments).
4.2 BAI’s Mission 2017-2019

The BAI’s Mission is divided into three distinct elements, as stated in the Strategy Statement:

- To regulate, foster and support broadcasting in the public interest
- To promote a plurality of voices, viewpoints, outlets and sources in Irish media
- To foster diverse and culturally relevant quality content for Irish audiences.

In the context of the inherent goals within this mission statement, the interview next addressed the perceived relevance of these goals for the forthcoming three-year period. Respondents were asked to consider their response in terms of the following answer options. A “not sure” response was also allowed for.

- More relevant
- Less relevant
- Remain the same

In particular, the issues of plurality and diversity, and support for the Broadcasting sector, are perceived to be even more relevant for the future than they are today, by up to 75% of the respondent group. In terms of regulation of the sector, while almost half believe this aspect will be more relevant in the future, less than mentioned for other goals, a further two in five believe its relevance will be about the same as currently. Only 12% believe it will be less relevant than currently. This aspect is recognised as a core component of the BAI’s role.
The top two issues emerge in a common position across all the stakeholder categories, with the exception of the Broadcaster group – these stakeholders place the support of their sector in first position in terms of future relevance, with 82% perceiving this goal to be more relevant for the next 3-year period.

Content creators and producers (those in the Sound & Vision/Grants/Sponsorship category) rate the promotion of plurality of voices and diversity of content as even more relevant for the future than average – 83% believe these goals will be more relevant.

4.3 BAI’s Values 2017-2019

There are four core values stated in the Strategy Statement. The BAI believe these values, taken together, serve to underpin the organisational culture and inform all operational activity. The values are:

- Fair – in our processes, procedures, and decisions
- Independent – operating as an impartial regulator
- Expert – by informing ourselves through engagement, research and a commitment to professional learning.
- Accountable – in our decisions, our governance, and our resources

In the context of this review, to determine how well or otherwise the BAI has performed in terms of its stated values, stakeholders were asked to consider the degree to which they associate the BAI with each of these values. For this question, responses were measured using a three-point scale, as shown below. A “not sure” response was also allowed for.

- Strongly associate
- Somewhat associate
- Do not associate

In general, the BAI is associated to a very significant level with each of its values. Across the four values measured, between 88% and 95% of all respondents associate the BAI at some level with each one. In particular, the BAI performs most strongly in terms of being fair and being independent and, while not directly comparable, this finding is broadly in line with similar results from the 2016 study. For the regulator of the industry, these findings suggest a strong endorsement of the BAI’s role among its stakeholders.
Across all the stakeholder respondent categories, there is significant levels of association of the BAI with each of its core values. Internal stakeholders consistently rate the organisation very positively across all dimensions and more than three quarters select the highest point of the scale on three of the four values – leading with independence, accountability and fairness – perhaps reflecting that these values, from their perspective, are indeed embedded in the culture of the organisation and are not simply aspirational.

On the four values being measured, BAI scores relatively less well in terms of being Expert. Among the total respondent base, 43% “strongly associate” the BAI with this value, the lowest “top score” rating of the four being measured. While a further 45% perceive the organisation to be “somewhat associated” with this value, one in ten do not believe the organisation is expert. This view is almost entirely held by external stakeholders – 14% of the non-BAI associated respondent category do not associate the organisation with being expert.

Prior to moving onto an assessment of objectives, respondents had the opportunity to comment on any additional values or goals that should be included in the next strategy. Again, as this is an open, “unstructured” response question the nature of the comments varied considerably. However, in terms of values to be considered for the future strategy the suggestions included the following:

Motivated to serve the public, informed, adaptable, efficient, proportionate, responsive, focused, innovative, creative, foster ambition

Other comments emerging reflected the proposed goals for the future and again included the ambition to reflect the “new” Ireland – all nationalities, cultures and minorities, to support news integrity and quality journalism, to be more transparent in decision making and to support the sustainability of the industry in to the future, particularly in terms of the loss of revenues out of Ireland to digital competitors. The comments overleaf reflect the commentary emerging;
“Integrity - to espouse and advocate for the integrity of information standards - has never been more important.”

“Help adapt regulation to allow broadcasters to thrive and survive in a constantly changing media environment.”

“The BAI must include a wider range of stakeholders in all of its engagements and consultations in order to best capture the potential impact that its decisions can have for various stakeholders.”

4.4 **BAI’s Objectives – 2017-2019**

The vision, mission and values of the Authority as discussed above are reflected in a series of strategic objectives organised within five strategic themes. The interview next moved on to measure the assessment of the BAI by stakeholders in relation to these strategic objectives.

Each strategic theme was considered in turn with the relevant objectives for that theme described in full. To provide the respondent with all pertinent information prior to assessment, an overview of the BAI’s intended outcomes in relation to these objectives, as described in the Strategy Statement, was presented on screen alongside a description of the key actions taken to support their achievement. This enabled the respondent to review and refresh their understanding before rating the BAI’s performance in meeting each one. As before, responses were measured using a four-point scale rating levels of achievement. Answer options were as follows and allowed for a “not sure” response:

- Achieved in full
- Substantially achieved
- Achieved in part
- Under achieved

4.5.1 **BAI’s Objectives – 2017-2019 – Theme 1 – Promoting Diversity and Plurality**

The first broad theme includes four strategic objectives on the issue of promoting diversity and plurality. Key actions and activities undertaken by the BAI to support the intended outcomes, as identified in the Strategy Statement, included the development of policies and undertaking of research on Media Plurality, the revised Broadcasting Services Strategy, the Sound and Vision and Archiving Schemes and BAI’s action plans supporting diversity and the Irish language.

On this theme, the BAI achieves a relatively strong performance across the board with upwards of 80% of stakeholders perceiving that the objectives were met at least “in part”.
Of the four objectives measured in this section the BAI performs most strongly on the issue of *increasing the production and availability of culturally relevant AV content for Irish audiences*. When we look at the combined Top 2 score, over half of all stakeholders believe the BAI has achieved this objective *in full or substantially*. This view is strongest among BAI Associates - those stakeholders naturally closest to the implementation of the strategy and the various funding schemes available – almost four in every five believe this objective has been substantially or fully achieved. On the other hand, among Broadcasters, while two in every five (40%) deliver a Top 2 level rating, a further 39% perceive the BAI to have achieved this objective in part and 16% to have underachieved.

### Objectives: Has BAI Achieved Its Objectives

![Chart showing achievement levels](chart)

The chart above illustrates the level of achievement by the BAI on these objectives and shows the relatively small proportions who rate the organisation on the lowest level of the scale - as having underachieved on these objectives.

Looking at the levels of perceived underachievement, we can see that relatively speaking, the BAI performs less well on the objective of *“fostering a media landscape that is representative of, and accessible to, the diversity of Irish society”*. While 44% rate the BAI as having achieved this objective in full/substantially, and a further 37% in part, a significant minority of 17% believe they underachieved on this objective. Not unexpectedly, external stakeholders are more critical on this issue – one in five rate the BAI as having underachieved on this objective.

Those respondents who rated the BAI as having achieved “*in part/underachieved*” on any objective were asked the following question - “*what could the BAI have done to better achieve its objectives for 2017-2019*”?
Once again, the responses varied greatly but some common themes emerged including the need to support Irish, locally produced content that is somehow new and different. The issue of representing the face of the “new” Ireland again emerges in the context of these objectives, not forgetting language diversity. Plurality of voice and the concentration of ownership also emerged in the commentary at this question. The selection of comments below helps to illustrate.

“BAI might need to have more involvement in initiatives to enhance the creation of Irish content- Irish owned IP - more sectoral engagement in professional development - beyond training”.

“The BAI could have supported/funded more research on how representative the media is of Irish society, in content and production personnel, in terms of gender, ethnicity and disability, in particular. With little or no data, it is difficult to determine whether the BAI has achieved its objective in this area.”

“Areas of particular note are prominence for public service media services and content, and media plurality and diversity in a converged media market - the value and importance of ensuring indigenous content is available and findable, and also that Ireland’s national identity is protected in a pluralist media sector, beyond solely broadcast.”

Respondents were next asked to consider the range of objectives again in terms of their relevance for the coming three-year period. Four in every five (79%) believe the issue of plurality of voice will be even more relevant for the next strategy closely followed (77%) by the need to foster a representative and accessible media landscape.

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**Objectives: Relevance Over Next 3 Years**

![Chart showing relevance of objectives over next 3 years]
In terms of the promotion of quality programming in the Irish language, relatively speaking this appears to be a less critical issue than others. However, that does not necessarily diminish its importance – while only 42% believe it will be more relevant for the coming three-year period another 40% believe Irish language programming will have the same relevance as currently.

4.5.1 The Stakeholder Qualitative workshop – Views on Plurality and Diversity

During the stakeholder qualitative workshops (described earlier in this report) there was significant discussion on the issues of plurality and diversity. For some broadcasters, consolidation is a means of survival but not necessarily at the expense of the local, Irish voice – consolidation can in fact protect that voice. For others, there is concern that consolidation will inevitably lead to the potential loss of the local Irish voice – these believe that the mix of local and community broadcasters can deliver a broader mix of voices and viewpoints with space to embrace the emerging multi-cultural communities.

For content producers, plurality means an expansion of outlets for their content beyond the Irish broadcast media – this group is hugely aware of the digital content space and is advocating for the development of a sustainable route to digital platforms that can be used to place their content alongside Irish radio and TV channels.

While diversity is seen as an important issue for all, for many they believe this is a somewhat idealistic goal unless the sector gets more support to sustain its survival into the future. Some expressed the concern that the Irish voice and heritage will be lost altogether without this support, before consideration can be given to the more multi-cultural environment and its need of expression.

The Sound and Vision scheme is perceived to be one critical element to deliver on diversity and, although the administrative processes are perceived by many to create barriers to the scheme, it is recognised as one reliable funding stream to the sector. However, stakeholders argue this scheme in its current format is not enough. Stakeholders would like to see the Sound and Vision scheme be more flexible, easier to access, with a faster turnaround of decisions, and one that can perhaps allow a ‘fast-track’ for established, professional producers and broadcasters in the sector. Additional funding schemes, not necessarily from the BAI, some say are badly needed, and in the case of content producers, these are needed to provide support particularly at the development stage.
4.5.2 BAI’s Objectives – Theme 2 – Achieving Excellence and Accountability

The second broad theme includes three strategic objectives on the issue of achieving excellence and accountability.

The objectives covered by this broad theme reflect the role, functions and position of the BAI in terms of undertaking its public service role as a regulator in a transparent and appropriate manner as is expected of a public service organisation – aiming to undertake all business in a responsible manner and striving to be a model of good governance in the sector. To this end, key actions and activities undertaken by the BAI included the implementation of its compliance action plan - BAI Codes and Rules, the complaints process for members of the public, the development of an Environmental and Social vision and plan, the BAI’s compliance with the Code of Practice for the Governance of State Bodies, as well as staff training and development initiatives.

Across the three objectives measured under this theme, the assessment is somewhat more mixed than seen in the previous theme with stakeholders scores (rating achieved at least in part) ranging from a high of 91% on the issue of regulation, to 69% in terms of promoting an innovative and challenging working environment. On the issue of regulation, the BAI achieved its highest score out of all twelve objectives measured. Just over seven in ten respondents rated the BAI as having either achieved this objective in full or substantially, a significant achievement in terms of delivering on a core function of the organisation and in effect reflecting a measure of trust by all stakeholders in its effort and activities to ensure a responsible and accountable broadcasting sector. In general, internal stakeholders are, relatively speaking, more critical of the BAI on these objectives than other stakeholders – this is perhaps due to a greater awareness and intimate knowledge of the requirements for the organisation and its operations.

Objectives: Has BAI Achieved Its Objectives

<table>
<thead>
<tr>
<th>THEME 2: ACHIEVING EXCELLENCE AND ACCOUNTABILITY</th>
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</thead>
<tbody>
<tr>
<td>Regulated to achieve a responsible and accountable broadcasting sector</td>
</tr>
<tr>
<td>Achieved in full</td>
</tr>
<tr>
<td>17</td>
</tr>
<tr>
<td>Shown leadership in sustainable development by modelling and promoting high standards of environmental, social and governance practice</td>
</tr>
<tr>
<td>10</td>
</tr>
<tr>
<td>Promoted an innovative working environment that motivates, challenges and develops the BAI</td>
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<td>12</td>
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</table>
In relation to the second objective – the BAI has shown leadership in sustainable development by modelling and promoting high standards of environmental, social and governance practice - the BAI has also achieved one of the highest scores across all measured. More than three-quarters of all stakeholders perceive the BAI to have achieved this objective at least in part with more than half of all delivering a Top 2 rating score (achieved in full/substantially). Interestingly internal BAI stakeholders are more critical than others of the organisation in this regard, 44% provide a Top 2 rating score, a further 29% perceive this objective has been achieved in part and almost one-quarter rate the organisation as having underachieved to date. Once again, greater familiarity with set objectives and targeted outcomes no doubt results in heightened expectations of performance standards.

On the final objective in this section, promoting an innovative working environment, perhaps unsurprisingly, a relatively large proportion of external stakeholders, 24%, responded to this question as “not sure”. But despite that, from the perspective of these external stakeholders, the BAI has achieved this objective to a satisfactory degree – 66% rate the BAI as having achieved this objective at least in part and almost 40% offer a Top 2 rating. However, this objective is perhaps most applicable to the internal stakeholder group and while half of these believe the objective has been achieved to a substantial degree, a further 27% believe it has only been achieved in part and just over one in five believe the organisation has underachieved on this objective.

Once again respondents who delivered a rating of achieved in part/underachieved on any of these objectives were asked what the BAI could have done better to achieve its objectives. As before, the question was unstructured inviting an open-ended response and once again the range and variety of response was quite broad. However, the themes emerging include the need for additional work under the theme of sustainability and more and better engagement with broadcasters and the media industry. The comments below illustrate.

“They have been very accountable and open. I think it is essential that this practice continues, and that they are always open and strive to be ethically beyond reproach. They need to be trusted by the wider public…”

“The BAI’s focus on sustainability came late in the term of the current Strategy and will not have been progressed as much as it should by end of 2019. However, a strong and ambitious plan in this area has been developed and should be an important area for the next Strategy.”

“The BAI has been supportive in principle, but I think more practical partnerships and more strategic sharing of relevant data between the BAI and stakeholders to improve the industry going forward is key.”

“Role of BAI perhaps still not as widely known or understood as it might be.”
The next question in the survey asked respondents to consider the relevance of these objectives for the forthcoming three-year period. In the case of all three objectives more than 60% perceived these objectives will be more relevant for the future. In particular, internal stakeholders clearly identify the most relevant of the three objectives will be to show leadership in sustainable development. Fully three-quarters of internal stakeholders rate this objective as being more relevant for the future. Furthermore, two-thirds of this group believe the promotion of an innovative working environment will be more relevant.

### Objectives: Relevance Over Next 3 Years

**Theme 2: Achieving Excellence and Accountability**

- **Regulate to achieve a responsible and accountable broadcasting sector**: 63%
- **Show leadership in sustainable development by modelling and promoting high standards of environmental, social and governance practice**: 64%
- **Promote an innovative working environment that motivates, challenges and develops the BAI**: 61%

Interestingly, the vast majority of stakeholders in the Sound & Vision/Sponsorship group, 81%, believe that regulation to achieve a responsible and accountable broadcasting sector will be more relevant perhaps reflecting the impact an accountable sector has on capacity to find a platform to showcase their content.

### 4.5.2 The Stakeholder Qualitative workshop – Views on Regulation

During the follow up stakeholder workshops there was some discussion on regulation. However, in this context, the main thrust of the commentary was in the context of the sustainability of the sector in a globalised and digital world. Therefore, we have presented further feedback in section 4.5.5 which reports the BAI’s achievement of its objectives under the strategic theme of ‘Enhancing Innovation and Sectoral Sustainability’.
Briefly however, on the issue of regulation, broadcasters want to see what they perceive to be a level playing field with global digital media under the same regulatory environment as Irish broadcast media. This issue causes significant frustration, and more importantly, broadcasters believe results in the greatest impact on their competitiveness and ability to survive. There is awareness of the AVMSD (Audiovisual Media Services Directive) consultations and while stakeholders are hopeful and eager to see how this can deliver change and what they believe will be a more equitable media environment, there is a belief and to some degree, fear, that the pace of growth in the online space will make it difficult for any legislation to keep up and stay relevant.

### 4.5.3 BAI’s Objectives – Theme 3 – Communicating and Influencing

The third theme within the Strategy Statement includes one single objective - *to promote public debate and inform policy to facilitate a vibrant, dynamic media landscape*. The BAI’s intended outcome by the end of the three-year period is to be viewed by stakeholders as an informative, authoritative and influential voice in media matters. The key actions and activities identified by the BAI to achieve this objective included research and publication of reports on broadcasting matters, the BAI Media Research Funding Scheme, the BAI’s participation in national and European fora and stakeholder events, engagement with the Minister and the Department of Communications, Climate Action and the Environment, and relevant Joint Committees on regulatory and media matters as well as undertaking public consultations and regular communication with the sector and the public.

Among stakeholders this objective is rated highest of all in terms of relevance for the future strategy. However, in terms of a measure of performance in the period of the current Strategy, views on this issue are somewhat more mixed with half of all stakeholders rating the BAI as having achieved this objective in full or substantially and almost half believing this objective has been achieved in part or underachieved.

### Objectives: Has BAI Achieved Its Objectives

<table>
<thead>
<tr>
<th>THEME 3: COMMUNICATING AND INFLUENCING</th>
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<tbody>
<tr>
<td>Achieved in full</td>
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<tr>
<td>12</td>
</tr>
</tbody>
</table>

Promoted public debate and informed policy to facilitate a vibrant, dynamic media landscape
15% of all stakeholders perceive the organisation to have underachieved on this objective, and, external stakeholders are more likely to deliver a rating at the bottom two points of the scale.

When asked what the organisation could have done better to achieve its objective, two broad themes emerged. The first was the desire to see the BAI as an advocate for the industry - to be the independent and trusted voice. There is a belief among some respondents that the organisation should be louder in promoting their activities and should strive to heighten the profile of the organisation and the profile of the industry, through greater engagement with the general public and across the industry as a whole. Indeed, this theme emerges in feedback provided on all five strategic themes. There is a sense among some that activities in this regard are typically low-key and not widely publicised resulting in limited awareness of its activities among stakeholders and very limited awareness of the the BAI and its role among the general public. The comment below helps to illustrate this point.

“Ireland desperately needs a coherent debate about the media it needs and wants. The BAI must play a leading role in convening, leading and agitating for this debate. Whether on reform of the TV Licence, the opportunities of AVMSD (Audiovisual Media Services Directive), or media literacy – the BAI needs to be a much louder voice.”

The other issue mentioned in terms of what the BAI could have done better to achieve this objective, is the need for more audience research and consultation on the issues currently facing the media industry and to share this data among relevant stakeholders.

“Areas where BAI has the potential to have greater influence are around regular independent media market reports either prepared or commissioned by BAI, and also in advocating for the urgent need to update national media policy, reflective of market trends and audience behaviours.”

“Mediatique’s Media Landscape report was really useful and comprehensive – important for the whole sector to have high standards of verified, non-partisan information. It would be good to have a commitment to doing same every 24 months.”

“The leadership role played by BAI in Media Literacy is very welcome. It would be helpful for the related stakeholders to have reassurance and clarity on BAI’s explicit support in the years ahead to amplify the relevant messages that will be increasingly important and of value to Irish citizens as media consumers.”
As mentioned earlier, in terms of future relevance this objective is the one rated highest of all measured in this survey – the vast majority of stakeholders, 84%, believe this issue will be more relevant in the forthcoming three-year period.

**Objectives: Relevance Over Next 3 Years**

**4.5.3 The Stakeholder Qualitative workshop – Views on Promoting Public Debate**

This issue was discussed in some detail by broadcasters during the follow-up qualitative workshops. In this forum, the discussion revolved around how the sector can best be supported and promoted to maintain its relevance and quality output and to survive in a globalised media landscape.

Among these stakeholders, there was a recognition that in a time when all media is perceived as being under threat, that a strong, effective and reliable media is most important. To promote this vision, an independent voice is key – one that is truly independent. The opinion expressed by stakeholders is that the BAI should be the advocate, the independent voice and public face of the sector and to do this effectively, the organisation needs to be proactive in its promotion of the sector.

A strong, and effective media is seen to be of critical importance to these stakeholders who perceive their sector to be under considerable threat from unregulated content providers and social media commentators. Stakeholders, particularly the smaller local and community broadcasters, would welcome support to achieve and drive quality journalism and believe to do this effectively, an independent voice is critical.
Among all stakeholders there is a belief that the most urgent debate needed is on the sustainability of the sector.

4.5.4 BAI’s Objectives – Theme 4 – Empowering Audiences

The fourth theme within the Strategy Statement also includes one single objective - to develop the understanding, engagement and participation of the public in an evolving media landscape. To this end the BAI set out to undertake a range of actions in the period of the Strategy Statement in the area of media literacy, media research and the implementation of codes and processes aimed at protecting and engaging the public. This objective has emerged in the Top 3 in terms of perceived relevance for the future strategy period.

While overall more than four in every five respondents believe the BAI has achieved this objective at least in part, the breakdown shows that 44% deliver a Top 2 score (achieved in full/substantially) and, at the other end of the scale, 11% believe the BAI underachieved on this objective. External stakeholders are mixed in their assessment suggesting, from their perspective, there is more work to be done - 40% deliver a Top 2 score and 40% believe the BAI has achieved this objective in part, but only 12% believe the BAI underachieved in this regard.

Objectives: Has BAI Achieved Its Objectives

When those respondents who delivered a partly/underachieved rating were asked what the BAI could have done to better achieve this objective a couple of themes emerged. Firstly, that the BAI should seek out and drive their profile by engaging more with the industry and the public, among whom there is a perception that awareness of the BAI is very low. While this theme also featured in the previous section Communicating and Influencing, in this context, comments relate to the requirement to increase awareness of the BAI’s role, and the role of Broadcasters, among the general public. The comments overleaf illustrate:
“The BAI could have engaged the public more directly. This could be done via public conversations and also by how it communicates and where it communicates. For example, more publicity around its complaints handling function and more engaging approaches to consultations, particularly where the topic is important but complex.”

“The BAI has implemented useful key actions to empower audiences and develop understanding of the evolving media landscape, but there should be acknowledgement that this process takes time. Further and perhaps more direct engagement with the public and audiences themselves, rather than sectors related to the broadcasting industry, may serve to broaden the general public’s awareness of issues.”

The next theme emerging from the commentary relates to media literacy. The initiatives already in place are recognised as valuable in the effort to build a greater understanding of relevant issues among the public, but there is also a recognition that additional resources are required to maximise this effort.

“The BAI has done some important work in helping to establish the Media Literacy Ireland Network however, I don’t know if this has increased the public’s understanding of, engagement with and participation in the media. The BAI could support research to establish baseline data on these aspects of media literacy, which could be used in long-term trends research.”

“Promotion of media and media literacy – this has now been implemented but could be done on a wider scale....”

“The introduction of the Gender Action Plan, the establishment of Media Literacy Ireland and the Irish Language scheme have been extremely positive for the BAI and broadcasting audience. These initiatives should continue to be supported by the BAI.”
As previously mentioned, this objective is perceived to be a very significant one for the future strategy. More than four in every five respondents, 82%, rate this objective as being more relevant over the next three years.

**Objectives: Relevance Over Next 3 Years**

**THEME 4: EMPOWERING AUDIENCES**

Develop the understanding, engagement and participation of the public in an evolving media landscape

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<tbody>
<tr>
<td>More relevant</td>
<td>82</td>
</tr>
<tr>
<td>About the same</td>
<td>16</td>
</tr>
<tr>
<td>Less relevant</td>
<td>1</td>
</tr>
<tr>
<td>Not sure</td>
<td>2</td>
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Further specific discussion did not emerge on this issue during the Stakeholder qualitative workshops. This does not take away from its perceived importance as illustrated above, but perhaps reflects that stakeholders recognise that actions and initiatives are underway and yielding some success and that other objectives are currently seen to be more mission critical.

**4.5.5  BAI’s Objectives – Theme 5 – Enhancing Innovation & Sectoral Sustainability**

The final broad theme measured in this survey, *Enhancing Innovation and Sectoral Sustainability*, is the one which featured significantly in the discussion among stakeholders during the qualitative workshops. This theme encompasses three separate objectives, two intended outcomes and the BAI’s key actions included the operation of funding schemes and the implementation of initiatives to support and develop creativity, innovation and sector sustainability.

Relatively speaking this is the area where the BAI is perceived to have performed less well compared to other objectives. Nevertheless, of the three objectives measured, the first one - *Encourage creativity and innovation as distinctive features of the Irish audio-visual sector* – the BAI has performed well. Almost half of all respondents (49%) delivered a performance score at the top end of the scale (achieved in full/substantially) and a further 32% believed this objective is achieved in part. 14% believe the BAI has underachieved on this objective.
Objectives: Has BAI Achieved Its Objectives

**THEME 5. ENHANCING INNOVATION AND SECTORAL SUSTAINABILITY**

<table>
<thead>
<tr>
<th>Objective</th>
<th>Achieved in full</th>
<th>Substantially achieved</th>
<th>Achieved in part</th>
<th>Under achieved</th>
<th>Not sure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Encouraged creativity and innovation as distinctive features of the Irish audio-visual (television and radio) sector</td>
<td>6</td>
<td>43</td>
<td>32</td>
<td>14</td>
<td>5</td>
</tr>
<tr>
<td>Ensured an increased focus on creativity and innovation across all BAI activities</td>
<td>4</td>
<td>30</td>
<td>38</td>
<td>17</td>
<td>11</td>
</tr>
<tr>
<td>Worked with stakeholders to support the achievement of greater sustainability for the Irish audio-visual (radio and television) sector</td>
<td>7</td>
<td>29</td>
<td>36</td>
<td>19</td>
<td>9</td>
</tr>
</tbody>
</table>

However, on the final two objectives a relatively significant minority perceive the BAI to have underachieved during the period of the strategy statement. On the objective - *Ensured an increased focus on creativity and innovation across all BAI activities* – while one third of all stakeholders rate the BAI at the top end of the scale (achieved in full/substantially), this is the lowest rating across all objectives measured. Almost 40% however perceive the BAI to have achieved this objective in part and a further 17% to have underachieved – this ‘underachieved’ measure held to the same extent by internal and external stakeholders, although when examining the external stakeholder cohort, those in the Sound & Vision/Grants segment, (content creators and producers), are proportionally more critical than others.

The third objective within this theme – *Worked with stakeholders to support the achievement of greater sustainability for the Irish audio-visual sector* – was the one which garnered most discussion in the qualitative workshop phase. Also, in terms of relevance, this objective was the second highest mentioned in terms of relevance for the future strategy period. On this objective, while 72% believe the objective was achieved at least in part (36% in full/substantially and 36% in part) one in five rate the BAI as having underachieved in this area. External stakeholders, particularly broadcasters, are more critical of the BAI in this regard.

When asked what the BAI could have done to better achieve its objective, again a range of diverse comments emerged. The theme with more mentions than others was in relation to an enhanced Sound and Vision scheme and other funding schemes to support the development stage in content production, as well as training and upskilling initiatives. These views were echoed in the qualitative workshop discussions. The following comments illustrate:

“*The only real interaction point of the BAI with the creativity process is Sound and Vision. It is subject of a separate review.*
...The funding schemes are very welcome within the sector, but they cannot be the sum total of the plan in this regard."

“There is little support from the BAI in helping develop new business models or supporting the development of new content formats (podcasts, on demand video, multimedia projects).”

“Link the upskilling of Irish talent to all funding decisions to encourage the growth of the sector and the emergence of new voices...”

Other comments emerging relate, once again, to having greater engagement and communication, industry-wide in a bid to support sector sustainability. As mentioned earlier, collaboration (partnerships and initiatives with key stakeholders) to support greater sustainability for, as well as creativity and innovation in, the sector is considered crucial for the future. This view is held across all respondent sectors although among the Sound & Vision/Grants segment the issue of creativity and innovation in the sector is considered equally important – on all three objectives, more than 80% of this cohort believe they will be more relevant in the next three-year period.

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**Objectives: Relevance Over Next 3 Years**

<table>
<thead>
<tr>
<th>Theme 5. Enhancing Innovation and Sectoral Sustainability</th>
<th>Encourage creativity and innovation as distinctive features of the Irish audio-visual (television and radio) sector</th>
<th>Ensure an increased focus on creativity and innovation across all BAI activities</th>
<th>Work with stakeholders to support the achievement of greater sustainability for the Irish audio-visual (radio and television) sector</th>
</tr>
</thead>
<tbody>
<tr>
<td>More relevant</td>
<td>66</td>
<td>64</td>
<td>83</td>
</tr>
<tr>
<td>About the same</td>
<td>27</td>
<td>24</td>
<td>13</td>
</tr>
<tr>
<td>Less relevant</td>
<td>4</td>
<td>5</td>
<td>2</td>
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<tr>
<td>Not sure</td>
<td>2</td>
<td>6</td>
<td>2</td>
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4.5.5 The Stakeholder Qualitative Workshop – Views on Sectoral Sustainability

The issue of sustainability of the sector for the future was the primary concern expressed during the stakeholder group discussions and it is a concern that seems to colour every other issue from the perspective of these stakeholders – issues already discussed in this report up to this point. For example,

- **Diversity** - while it is recognised by all as an important feature in broadcasting, from their perspective survival must come first – without an indigenous broadcasting sector diversity cannot flourish and the Irish voice and culture could be endangered.
- **Plurality** – would consolidation ensure the survival of the sector or would it contribute to its demise.
- **Creativity** – the perceived lack of funding is inhibiting creativity with little resource to allow development of innovative creative projects.
- **Debate and advocacy** – the sector want to see an independent advocate to promote, support and protect their industry into the future.

Businesses perceive their priority must be one of survival first. More broadly, from the perspective of the broadcasters, they now operate in a media environment that has seen the incursion of global digital players into the Irish market over the last number of years, global organisations which attract significant commercial revenue from the Irish market. This is having a direct impact on the levels of potential revenues to be earned by indigenous broadcasters.

This situation is deeply concerning to broadcasters and furthermore is exacerbated by what they see as an inequitable regulatory situation, an issue mentioned earlier in this review. All Irish broadcasters are subject to regulation by the BAI but digital operators, and the commercial content and messaging they broadcast, are currently unregulated and this is perceived to further disadvantage Irish broadcasters. Broadcasters hope to see a regulatory environment that incorporates the digital sector and one which facilitates a review of the current regulatory controls thus allowing them to compete on what they see as a “level playing field”. Further to this point stakeholders express their concern that the current legislation is no longer fit for purpose. There are fears that the pace of growth in the digital sector will outpace any new legislation.

From the perspective of content producers and creators, again sustainability of the sector is the overriding concern. There is a perceived limitation of funding in the sector particularly at the creative/development stage which results in the risk, from their point of view, of driving content producers out of the sector on the one hand and, on the other hand, presenting a barrier to new talent entering. Many of this group see potential opportunities in the digital broadcasting space and they would like to see support for an independent platform, outside of the current Irish channels, that would provide an additional access point to their audience.

All stakeholders recognise the role and value of the Sound and Vision scheme, which is one that all rely on from a funding perspective and one which they consider to be important to help deliver on diversity in the sector. As mentioned earlier in this report, while this scheme is very welcome, there are many perceived administrative burdens associated with the scheme which may cause barriers to access for some.
In this environment, among all stakeholders, there is a consistent requirement for support and, while it is recognised that the BAI cannot be the sole source of funding, stakeholders would like to see more funding opportunities available to them.

### 4.6 Looking Ahead – Themes, Objectives, Outcomes to be Considered for the Future

The final two questions of the quantitative survey were formatted as open “unstructured” response questions. While a significant range of responses was achieved from these questions, the comments emerging repeat and reinforce the issues already highlighted in this review with regard to the vision and the strategic objectives and which provoked considerable discussion at the stakeholder workshops. This fact, in itself, underscores the sheer gravity of the issues from the perspective of stakeholders.

Firstly, respondents were asked to consider what matters the BAI should consider when developing a strategy for the next three-year period. The single theme emerging with most comments related to the sustainability of the industry in the face of the digital challenge and the corresponding need for regulation of digital media. Other issues emerging here included the enhancement of the Sound & Vision scheme, efforts to promote diversity, to protect the Irish voice and to advocate for quality journalism and unique Irish content. The comments below illustrate the range of responses at this question.

“**The fake news debate will be really important, and it is important that broadcasters hold the line against the unregulated online content.”**

“**The primary consideration should be around the protection, enhancement and development of home-produced content across all genres given the huge impact of global providers.”**

“**Support Irish creators and engage with them, greater encouragement of developing Irish creative talent within Sound and Vision funding and supporting Irish content which can travel internationally.”**

“**New interpretations of media diversity and a level playing field across traditional media.”**

“**The single biggest challenge for the BAI over the next three years will be the requirement to transition to being a new organisation or a substantial part of a new organisation that has a far wider media regulatory brief…the key focus will be to become established as a credible regulator with the media to be regulated, to deliver effective regulation, to communicate effectively with the public/audiences and to develop an organisation which will deliver on these goals and provide an innovative and supportive place to work for its staff.”**

And finally, respondents were asked what themes, objectives or outcomes should be included in the BAI’s next three-year Strategy Statement. A similar flavour of responses emerged, once again focusing on the sustainability of the sector, review of regulation, diversity, the importance of journalistic integrity and the requirement for greater communication and engagement with stakeholders, particularly Irish viewers and listeners. Some illustrative comments overleaf.
“More emphasis on sustainability of the sector and on ensuring that the diversity of the Irish population is better reflected in and served by the broadcast media.”

“Sustainability of broadcasting in Ireland; Achieving diversity in broadcasting; Reviewing the role of broadcast journalism in the face of populism and threats to democracy.”

“Lighter regulation - the industry needs to be allowed to evolve and develop and not be unduly constrained by out-dated policies or rules that made sense 10-20 years ago. The Authority needs to review its own approach to regulation on a regular basis to ensure that all approaches and policies remain appropriate and relevant.”

“Media Plurality and Diversity, Independent Market Research, Media Literacy, Programme Standards, Reducing Administrative Burdens.”

“Accessibility should be a key theme in the BAI Strategy Statement ....an accessibility theme will empower people with disabilities to engage and participate in society as TV is a central part of today’s culture...”

“A new definition of Public Service Broadcasting.”
Appendix: Part 2
BAI Activity Report – Action Plans
2017-2019
With five key strategic themes highlighted and a series of strategic objectives, in early 2017 a three-year workplan was developed with associated activities embedded in all aspects of the work of the Authority, Statutory Committees and management of the BAI.

In this section, achievements under each theme over the final year of the Strategy in 2019 are presented in the following five infographics. Brief context to the infographics is provided below, including some significant strategic milestones in 2017 and 2018.

**Promoting Diversity and Plurality**

The Promotion of Plurality and Diversity included a number of key activities. Plurality was supported through the undertaking of major research projects on topics such as media ownership and the annual Reuters news report. There was also a jurisdictional review in 2018 to support the development of a Media Plurality Policy and a revision of the Ownership and Control policy. These policies were published in 2019. BAI expertise in media plurality continues to be recognised at a European level and, in 2018, the BAI chaired a sub-group on Media Plurality for the European Union’s regulatory group, ERGA. Throughout the Strategy period the BAI continued its participation in media plurality stakeholder events at both National and European Fora.

The promotion of diversity of programming content in Ireland continued to be supported through the Sound and Vision Scheme which, over six rounds from 2017 to 2019, provided funding support of €31m to 179 television projects and a further €3.7m to 557 radio projects. Through the Archiving Schemes, the BAI has also provided essential funding support for the preservation of Ireland’s broadcasting heritage.

The 2018 launch of the revised Broadcasting Services Strategy received strong stakeholder support. Mediatique's Media Landscape report and research which supported the review indicated broad satisfaction among the general public with the diversity of services available in Ireland. Over the three-year period in the area of licensing the BAI signed 17 sound broadcasting contracts, issued 12 content provision contracts and awarded contracts to 61 temporary radio services.
The BAI also renewed its Television Programme Service Contract with Virgin Media Television Limited in 2018.

The Gender Action Plan published in 2018 received widespread support and endorsement. Several important initiatives were developed from the Plan resulting in quantifiable improvements in representation of women on and off screen. At the end of 2018, the BAI conducted a targeted consultation with its Irish language stakeholders around the development of an Irish Language Action Plan. The BAI Irish Language Action Plan was published February 2019. As the Infographic notes, the Irish Language Advisory Committee, a joint BAI and Foras na Gaeilge initiative, was established pursuant to that Plan.

**Achieving Excellence and Accountability**

The theme of Achieving Excellence and Accountability includes both internal and external dimensions. On the broadcaster compliance side, the BAI compliance action plan was developed for 2018-2019 to support robust compliance and governance practices by all licensed broadcasters and funding contractors, while reflecting resource constraints. In 2018 having identified weaknesses in good governance practices throughout the community media sector, the BAI sectoral learning and development programme provided funding to support increased and higher quality governance structures in the community sector.

Internally the BAI has worked to ensure compliance with the Code of Practice for the Governance of State Bodies, as well as ongoing staff training and development initiatives. 71 Freedom of Information requests were also processed from 2017 to 2019, from a variety of sources. In 2019 the BAI also held a public consultation process on the review of its second Irish Language Scheme. The Scheme, which was established in accordance with the requirements of the Official Language Act 2003, consolidated and enhanced the progress made by the BAI over the lifetime of its first Scheme (3 years). The outcome ensured a better availability and a higher standard of public services through Irish.
Communicating and Influencing

This theme to promote public debate and inform policy to facilitate a vibrant, dynamic media landscape included activities such as research, publishing reports on broadcasting matters, operation of the BAI Media Research Funding Scheme, the BAI’s participation in national and European fora and stakeholder events, engagement with the Minister and Department of Communications, Climate Action and the Environment and relevant Joint Oireachtas Committees on regulatory and media matters.

The Communications team, as well as undertaking public consultations and regular engagements with the sector, awarded €424,700 in important sponsorship support over the three years to many valuable events and activities (see 2019 infographic), all of which raise awareness of the BAI and support the organisation’s strategic objectives.

Over the course of the Strategy the BAI has received significant external validation for work in a range of areas including our response to the Minister’s consultation on the proposed transposition of the AVMSD and regulation of Harmful Online Content. Many of the BAI recommendations in our consultation response were included in the Heads of Bill published by the Minister in January 2020. This provided strong support for one of our key outcomes for 2019 that “the BAI is viewed as an informative, authoritative and influential voice on media matters”.

Empowering Audiences

Under the theme of Empowering Audiences, the BAI has been to the forefront in the promotion of media literacy and media research. 2017 saw the launch of the multi-stakeholder network Media Literacy Ireland (MLI) and this network with the support of the BAI has continued to garner cross-sectoral support and to achieve cooperation among a range of members, including broadcasters, online platforms, and representatives from academia, civic, voluntary and community organisations.

The implementation of codes and processes aimed at protecting and engaging the public is also central to the Empowering Audiences objective. Over the three years of the Strategy, 253 complaints from viewers and listeners were received and considered. The 2019 infographic illustrates the type of complaints generally received in a year and under which Codes they were assessed.
In 2017 the BAI finalised and launched two codes – the General Commercial Communications Code and Short News Reporting Code. A statutory review was carried out on the Access Rules in 2018 followed by the publication of revised Rules in 2019. Election and Referendum Guidelines were also revised in 2018 and new guidelines developed which were actively promoted including workshops with broadcasters (see 2019 Infographic). The new guidelines gave greater emphasis on obligations around the use of social media in coverage.

Enhancing Innovation & Sectoral Sustainability

Activities under this broad theme included the operation of funding schemes and the implementation of initiatives to support and develop creativity, innovation and sectoral sustainability. Over the three years of the strategy, sectoral development funding of over €1.45m was provided to support industry networks and innovative projects relating to gender representation, animation, support for directors, skills development in drama and writers. Support also includes funding of independent networks which promote collaboration and building of strategic alliances that provide for a sustained approach to learning and development in the sector.

In 2016, the BAI commenced an annual tracker survey to provide information on, and, importantly, track over time, public opinion/perception of public service broadcasting (PSB) in Ireland in terms of public service value and importance. The research was undertaken by Behaviour & Attitudes (B&A) over a three-year period 2016-2018. A commentary report prepared by Mercury Insights was published in September 2019 (available at www.bai.ie). The survey results have been of considerable value to the BAI in informing its activities and decision-making processes when undertaking its regulatory functions in respect of the public service broadcasters.

In 2018 the BAI completed a comprehensive five-year review of the funding of public broadcasters. The aim of the review was to establish if RTÉ and TG4 have adequate funding to meet their statutory public service objects. This major piece of work presented a strong case to the Government for necessary additional funding to support the sustainability of the PSBs in the current media environment. The five-year review is in addition to the BAI annual reviews of public funding.
1. Promoting Diversity and Plurality

Broadcasting Fund

Sound & Vision funding for TV and radio

- €10.4m to 56 TV projects
- €1.27m to 185 radio projects

No. of programmes funded, by format

- Animation: 4
- Documentary: 169
- Drama: 31
- Education: 14
- Entertainment: 23

No. of programmes funded, by genre

- Adult/Media Literacy: 4
- Arts/Culture: 48
- Children's: 17
- Contemporary Society: 91
- History/Heritage: 68

Irish Language

Sound & Vision Irish Language funding

- English Language Programming: 73% & €8.5m
- Irish Language/Bilingual Programming: 27% & €3.1m

Gender

% Increase in female creatives

- TV Projects:
  - 67% increase with a female director
  - 50% increase with a female writer
  - 56% increase with a female director of photography
  - 17% increase with a female producer
  - 31% increase with a female editor

- Radio Projects:
  - 36% increase with a female producer
  - 33% increase with a female writer
  - 25% increase with a female editor
Media Plurality

The BAI’s Media Plurality Policy and Ownership and Control Policy were launched in June 2019, supporting the BAI’s objective of facilitating a mix of voices, opinions and sources of news and current affairs in broadcasting which enhance democratic debate and active citizenship.

Broadcasting Fund

The Broadcasting Fund provides funding for television and radio programming and for archiving programme material and is financed through 7% of the television licence fee.

The BAI’s Archiving Scheme encourages and promotes the development of an archiving culture in the Irish broadcasting sector, contributing to the safeguarding of Irish heritage. €1.33m was allocated to 5 archiving projects in 2019, with an emphasis on safeguarding programme material threatened by fragile physical condition.

The BAI’s Sound & Vision 3 Scheme provides funding for high-quality television and radio programmes on the themes of Irish culture, heritage and experience, programmes that raise awareness of global issues and improve adult and media literacy and programmes in the Irish language. The BAI administered two funding rounds of Sound & Vision 3 in 2019, awarding funding of €11.67m to 241 television and radio projects.

In 2019, the BAI also reviewed the operation, effectiveness and impact of the Sound & Vision 3 Scheme and undertook a public consultation on a draft Sound & Vision 4 Scheme, which was informed by the findings of the review. The BAI expects to introduce a new funding scheme in 2020.

Irish Language

The BAI published its Irish Language Action Plan in February 2019, which set out actions to promote and stimulate the development of Irish language programming and broadcasting services. A key initiative has been the joint establishment of an Irish Language Advisory Committee by the BAI and Foras na Gaeilge. The Committee’s 2019 Report (available at www.bai.ie) details the work of the Committee during the year. The BAI also continues to devote a minimum of 25% of Sound & Vision funding to Irish language and bilingual radio and television programmes.

Gender

In line with the BAI’s Gender Action Plan, round 33 of the Sound & Vision Scheme encouraged applications for programmes dealing with women’s stories, in a bid to bring more female voices to Irish audiences. Applications were assessed against the standard criteria as well as the extent to which the programmes involved female creative talent and included female-focussed narratives.

100% of television programmes and 72% of radio programmes offered funding in this round had a focus on women’s stories.

There was also a significant increase in funding awards for projects in which women take a lead creative role, compared to the previous funding round.

Licensing

Licensing remains a key activity for the BAI with a focus on relicensing existing commercial radio and community radio services. The BAI signed broadcasting contracts with the following 3 radio services:

<table>
<thead>
<tr>
<th>Broadcaster Service Description</th>
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</thead>
<tbody>
<tr>
<td>Wilton Radio Limited t/a iRadio</td>
</tr>
<tr>
<td>Dundalk Media Centre CLG t/a Dundalk FM</td>
</tr>
<tr>
<td>Claremorris Community Radio CLG</td>
</tr>
</tbody>
</table>

The BAI awarded broadcasting contracts in principle and is currently in contract negotiations with the following 2 operators:

<table>
<thead>
<tr>
<th>Broadcaster Service Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Choice Broadcasting Limited t/a Classic Hits</td>
</tr>
<tr>
<td>Dublin North East Community Communications Cooperative Society Limited t/a Near FM</td>
</tr>
</tbody>
</table>

Licensing processes are also underway on 3 further radio services:

- A music-based service for the 35-55 age group in Dublin city and county,
- A classic rock music-based service for the 25+ age group in Dublin city and county and commuter belt, and
- A quasi-national christian and religious service for the 15+ age group.

In addition, the BAI licensed 22 temporary radio services in 2019 that are used by groups/individuals to broadcast during special events, for learning in schools or third level or as pilot community radio services. Finally, the BAI issued 7 content provision contracts for services that may be carried on satellite, cable or Digital Terrestrial Television (DTT) platforms.
2. Achieving Excellence & Accountability

BAI Governance

Freedom of Information (FOI) requests and decisions

Records were released in response to 13 of those requests, either in full, in part or the records were already publicly available and were provided to the requester outside the FOI process.

- 17 FOI requests were received
- 13 requests that had records released
- 1 ongoing request
- 1 request withdrawn by the requester
- 2 refused requests

Category of FOI requester 2019

- Journalist: 14
- Other: 3
The BAI continues to be a trusted regulator, to be recognised as a model of good governance and corporate responsibility, and to have a leadership and performance culture.

**Compliance**

The Compliance Plan 2018/19 adopted a risk-based approach to prioritize three compliance activities: statutory reporting; monitoring broadcast content and transmission; and undertaking performance reviews of broadcasters. This included the annual review of public funding for public service broadcasters. The BAI’s Sectoral Learning and Development programme provided funding for the community media sector for training initiatives to support better quality governance structures.

**BAI Governance**

In 2019, the BAI developed a Governance Handbook that encompasses all relevant governance matters for the organisation. The annual checklist on the Code of Practice for Governance of State Bodies confirmed strong adherence by the BAI to the governance requirements of the Code.

**Freedom of Information**

Accountability is one of the BAI’s core values and one way in which this is demonstrated is the BAI making its records available under the Freedom of Information (FOI) Act. BAI handled 17 FOI requests in 2019.

**Environmental and social best practice**

The BAI is committed to leading on social and environmental best practice and, in 2019, initiated a collaborative partnership with broadcasters to establish a network that will look at environmental and sustainability measures across the sector.
3. Communicating and Influencing

Communications

Social Media

- **179**
  - Posted on twitter

- **5,628**
  - Twitter followers (+458)

- **89**
  - Facebook posts

- **2,085**
  - Facebook Likes (+153)

Over the last **12 months**, videos uploaded to the BAI’s Vimeo account have received **767 plays**, and the most popular video was an Irish Sign Language video about the BAI Access Rules.

Our most popular organic Facebook post celebrated Dundalk FM signing their new **10-year** Community Radio license with the BAI. The August post attracted a reach of **4,837**.

On Twitter, our most popular tweet of the year was an Irish language Tweet about a GAA archive funded by the Archiving Scheme. The organic post had **10.3K impressions**.
The BAI continues to inform policy and promote public debate on media and broadcasting matters by engaging with national political decision makers, participating and showing leadership in European media forums, undertaking research, and communicating widely to industry and the public on the BAI’s work.

National Engagement

The BAI engaged with the Department of Communications, Climate Action and Environment on the Broadcasting (Amendment) Bill and made a comprehensive submission to the Department’s consultation on the Regulation of Harmful Online Content and the Implementation of the revised Audiovisual Media Services Directive (AVMSD). This submission set out the BAI’s vision for the future of media regulation in Ireland.

European Engagement

The BAI continued its active participation in two key European audiovisual bodies: EPRA, the European-wide independent network of audiovisual regulators, and ERGA, a group of representatives of national audiovisual regulators who advise the European Commission on matters related to the implementation of the AVMSD. In 2019, the BAI chaired a working group on Media Plurality and participated in a lead role in working groups on the Future of ERGA, AVMSD Implementation and Gender Diversity.

Research

The BAI continued to fund research to understand how news is consumed, with a focus on digital news consumption and the devices used to access the news. The BAI-commissioned Reuters Digital News Report (Ireland) 2019, prepared by the Institute for Future Media and Journalism (FuJo) at Dublin City University, found that Irish media achieved the highest rating for helping Irish news consumers understand the news of the day (59%), well above the European average of 48%.

In further research funded by the BAI, ElectCheck 2019 (Institute for Future Media and Journalism (FuJo) at Dublin City University) examined the political advertising activity online during the 2019 European Election campaign. This report was undertaken as part of a wider EU project to monitor the commitments made by Google, Facebook and Twitter in the self-regulatory Code of Practice on Disinformation to ensure transparent, fair and trustworthy online campaign activities ahead of the European elections.

Communications

The BAI communicates and promotes its activities through radio, press and TV interviews, stakeholder events, on its website and on social media.
4. Empowering Audiences

Broadcast Complaints

Complaints received by the BAI in 2019 relating to programming and advertisements broadcast on Irish radio and television: 71 complaints.

- Code of Fairness, Objectivity and Impartiality in News and Current Affairs: 40 complaints
- Code of Programme Standards: 11 complaints
- Code of Fairness, Objectivity & Impartiality in News and Current Affairs and Code of Programme Standards: 9 complaints
- General Commercial Communications Code: 8 complaints
- Children’s Commercial Communications Code: 3 complaints

Complaints Decisions

- Upheld or Upheld in part: 0/71
- Rejected: 56/71
- Resolved (between the complainant and broadcaster): 5/71
- In Progress: 10/71

The figures indicate a high level of compliance by the broadcasting sector with the BAI’s Codes.
The BAI works in partnership with other organisations to increase audience engagement with audiovisual content and their understanding of, and participation in, the production and dissemination of audiovisual content.

Media Literacy
The BAI continued to support the development of Media Literacy Ireland (MLI) by funding its co-ordinator and key events, such as the MLI annual conference in November 2019. MLI’s public awareness campaign Be Media Smart was launched in March and ran for two weeks on TV, radio, print, online and social media and was encountered by an estimated 1m people.

Public participation in media
The Community Media Working Group, established by the BAI, finalised its report, Community Media in Ireland – Sustainability and Participation, in January 2019. This report informed the BAI’s Community Media Action Plan (March 2019), which sets out actions to be undertaken to increase public participation in community media and support the sustainability of the sector.

Codes and Complaints
The BAI held training workshops with broadcasters on the BAI’s Election and Referenda Guidelines in advance of the Local and European Elections and the referendum on divorce in 2019.

In 2019, the BAI introduced an online system for submitting complaints about broadcast content, making it easier for members of the public to avail of the complaints process.
5. Enhancing Innovation & Sectoral Sustainability

### Sectoral Learning and Development

**€491,500**

in funding allocated to Sectoral Learning & Development initiatives

- **€342,850**
  - to industry and representative networks

### Sponsorship

**€157,500**

for sponsorship of 20 events/activities

- **2**
  - Irish Language feature films completed with funding from the Cine4 partnership of the BAI, TG4 and Screen Ireland.

- **7**
  - subjects in the Junior Cycle now have Irish audiovisual content as part of their online educational resources, including two programmes originally funded through the Sound & Vision 3 Scheme, thanks to a partnership between the BAI, RTÉ and Junior Cycle for Teachers.
In 2019, the BAI continued to support creativity and innovation through its Sectoral Learning and Development and Sponsorship programmes. The BAI also worked in collaboration with stakeholders to support greater sustainability in the broadcasting sector.

**Sectoral Learning and Development**

In 2019, the BAI allocated €491,500 to a range of training and skills development initiatives, including €342,850 to 16 industry and representative networks such as CRAOL (the representative body for community radio), Learning Waves (the training organisation for commercial radio broadcasters), Women on Air, the Writers Guild of Ireland, Animation Skillnet and Animation Ireland. €52,000 was allocated under the BAI’s Innovation Scheme to X-pollinator, a professional development programme for female creatives, and the Journalism Graduate Programme, a pilot initiative to give five journalism graduates experience in radio newsrooms, delivered in partnership with Learning Waves.

**Sponsorship**

The BAI allocated total sponsorship funding of €157,500 under the 2019 Sponsorship Scheme, comprised of €124,500 new funding awards to 16 events and activities and a €33,000 funding commitment to 4 events/activities under multi-annual sponsorship contracts from 2018. Sponsored events included the EuroRadio Conference, the Meeting of Independent Radio Producers in Ireland, the Celtic Media Festival and the Galway Film Fleadh.

**Community Media Action Plan**

The BAI agreed a community media action plan in 2019 to support greater sustainability for the community media sector. One initiative in the plan is devising a new methodology to evaluate the social benefit provided by the community media sector to their communities, which could have significant benefits in assisting the sector secure funding.