From Ritual to Reality

Public Broadcasters and Social Responsibility in the Netherlands

Jo Bardoel & Kees Brants

While the public is partly turning its back on them, public service broad-casters in Western Europe still claim state support and preferential treatment to realise their obligations towards society. Public broadcasters continue to see themselves as the principal guarantors of quality, diversity and, in the end, democracy itself. Whereas private stations are construed as only being in the business of making money, PSB's claim to live by a cultural-pedagogic logic: where the former are entertaining the public, they are concerned with their well being; while PSB is the embodiment of the Enlightenment ideal, the commercial stations are the doorway to the practice of a dumbing-down culture. In their defence, the private stations claim to be the 'real public channels' because they presumably know and give what the public wants. Their services are more truly in the public interest.

Although partly the rhetoric of the new competitive environment in which the two 'adversaries' smear one another while polishing their own perform-ance to such a shine it is all but blinding, the history and characteristics of public broadcasting are indeed paved with a sense of social responsibility and responsiveness. Because their monopoly status allowed them to take many things for granted, it was often considered self evident that their *raison d'être* was built on obligations towards society in which information, qual-ity, cultural enrichment and independence from state and commerce were the central ingredients. In claiming the mantle of social responsibility, they took account of and were accountable to the public. In practice, however, it was through political or administrative institutions that the latter took place and, as for the former, they were often unresponsive.

The way in and extent to which social responsibility notions are elabo-rated in theory and practice tend to vary from country to country and from period to period. Even the vocabulary of the discourse differs according to time and place. Where the notion of 'social responsibility' is very much an Anglo-Saxon invention (McQuail, 1994: 123), in German-speaking countries the concept of the 'public sphere' is more common. The popularity of Habermas' work has made this terminology more popular in – critical – Anglo-

American discourse in the last decade, too (see Calhoun, 1992; Garnham, 1993; Thompson, 1995; Nordenstreng, 1997a).

Since the mid-1980s this self-evident claim for public broadcasters' legitimisation has been challenged by changing political beliefs and the introduction of commercial television in Western Europe. Liberalisation and deregulation have created an atmosphere in which more and more citizens themselves hold these organisations directly responsible for their performance, regardless of public or private status. At the same time, social ethics are shifting towards more volatile and negotiable norms (the Shell and Brent Spar cases have been pivotal here), and the claim of public broadcasters to be the principal guardian of the public interest is challenged (Brants, 1999). Social responsibility thus tends to develop from a relevant policy issue to an asset for both public and private broadcasting organisations in the new context of competition and convergence.

In this new media environment in Europe, public broadcasters rethink and often rediscover their social responsibility towards society; if only because (supra-) national policy makers are requiring them to do so. On the basis of a content analysis of policy documents of the public broadcasting organisations in the Netherlands over a period of 40 years, we trace how they have (re)defined this, and in particular their role in relation to 1) the public interest, to 2) providing diverse, reliable and quality information, and to 3) minorities in a changing society. We thereby hope to shed light on the ways in which public broadcasters come to terms with the more market-oriented attitudes of subsequent governments, how they 'translate' new regulatory frameworks into programme policies, and in what ways they negotiate and articulate their new role *vis à vis* revised government policies.

In studying 40 years of policy in public broadcasting in the Netherlands, we can illustrate how such organisations have (re)defined their normative duty in light of their still preferential financial position. This work reflects a specific stage in a wider research on the question as to whether public service broadcasters can still rightfully claim a monopoly on a quality inspired cultural-pedagogic logic, or whether commercial channels (can) also perform in a socially responsible way? It is obvious that these questions are crucial for public broadcasters in a changing media landscape. In a previous study, we looked at the Dutch government's changing broadcasting policy over the years (Bardoel et al. 2000); the next step will be a similar research into the programme policies of the private stations.[1]

Researching a diffuse concept

In spite of claims and counter claims, both the meaning and context of the notion of 'social responsibility' [SR] are fairly ambiguous. We notice at least three different meanings. First, SR notions sometimes refer to *content*. In that

sense, information is not merely a commodity but also a social or 'merit' good that should be accurate, diverse and of high quality (e.g. Broadcasting Research Unit 1985; Picard 1989). A second notion of responsibility refers to the media's function for (democratic) *society*: apart from an economic role, media have political and cultural functions, allowing sufficient forums for the expression of opinions and enabling the public to fulfil its role as citizens (e.g. Van Cuilenburg & Slaa 1993; Dahlgren 1995). Finally, social responsibility refers to the *organisational status* of the broadcasters: media ownership is a public trust in which the content producers should be independent from both state and market forces, but still accountable to the public to avoid power without responsibility (e.g. Blumler & Hoffmann-Riem 1992; Siune & Hultén 1998).

Though responsibility (as obligation to the public) is often used interchangeably and confusingly with 'responsiveness' (as taking account of the public), it is clearly a normative notion linked to 'the public interest'. It is grounded in a belief in the makeability of society, the changeability of human nature and the establishment of the ideals of Enlightenment. It assumes that broadcast media are instrumental to social orientations of citizens and to social cohesion in society. The state, as the responsible agent for public policy, is often seen as, in the end, benevolent and acting in the public interest. At least, that is the dominant belief in a consensual democracy like the Netherlands (but probably less so in adversarial democracies such as the UK or the US).

The ambiguity of the concept can probably be explained by it being rooted in communication practice and policy rather than theory (Hellman 1999: 58). The most relevant documents do not stem from academic research but from policy advisory commissions like the Hutchins commission in the US (1947) and the British Royal Commission on the Press (1977). Consequently, the concept tends to be practical, oriented towards problem solving and, because of its political nature, contested and negotiable. As a result, the definitions differ from country to country and clearly reflect national media policies (cf. McQuail 1992). Its origin lies in policies for a traditionally market-driven press whose apparently 'irresponsible' behaviour needed (self)regulation. In a situation of channel scarcity for analogue broadcasting, where government interference was considered inevitable, legitimisation for a public policy was not really necessary.

Since the 1970s, however, interfering in public broadcasting and giving the organisations financial prerogatives and specific roles 'in the public interest' increasingly required legitimacy. Initially it took a more ritualistic form: the public monopoly was not seriously contested although an open government had to legitimise its prescriptive regulations. With the introduction of commercial television in the Netherlands and the changed policy environment premised on the EC Directive *Television without Frontiers*, both conspicuously introduced in 1989, interference and preferential treatment demanded a more deliberate strategic policy and legitimacy. While old pater-

nalistic imperatives were no longer taken for granted, the preferred position of the public broadcasters put them under an obligation. Their role and duty had to be stipulated and their social responsibility operationalised. At the same time, being socially responsible became an asset in the discursive struggle between public and private broadcasters.

Methods

But how to trace a concept that in its origin was mostly implicit and thus possibly invisible in documents? We follow a more or less inductive approach by, first, reconstructing the evolution of the concept as it can be traced in the policy documents of the public broadcasters and, second, by comparing this with the development we found with government policies. We use the concept in a sensitising way, open and ill-defined at the beginning of the research, serving as a general guideline for analysing the policy documents, and then gradually elaborating empirically based content (Blumer 1969).

Following this grounded theory approach, the first phase is *explorative*, composing a comprehensive list of social responsibility (SR) norms stemming from academic research and various policy notions. As we followed the same procedure when analysing government policy in an earlier phase of this research project, we already had made up a list of keywords to find notions of SR-norms in policy documents of the public broadcasters. These keywords originated from literature that gave an overview of SR-notions in other countries (e.g. McQuail, 1992; Mitchell & Blumler, 1994; McQuail, 1998). The list was a first tool to bridge the gap between abstract SR-theories and the more concrete and practical notions found in selected policy documents. Armed with this list, the content of the selected documents was analysed for the appearance of notions related to social responsibility.

Every 'text on paper' was transformed into a digital document to be able to trace all the social responsibility norms more easily (via the *word count* function in MS Word). Each of the SR-terms found in the text was highlighted if the context proved to be relevant, and then counted in a Microsoft Excel table. On the basis of the word count, a table was created for three chronological periods with the absolute frequency values of all the SR-norms detected in the policy documents. Subsequently, these values were situated in the three-category schema we defined earlier: media content requirements, role of media in/for society and organisational status.

In the second *reflective* phase of research, the various concepts were linked to a more comprehensive background by categorising the complete list of SR-norms in order to position them within a theoretical framework and to search for general tendencies in the development of social responsibility in the policies of the broadcasting organisations. In the final *interpretative* phase, the use of social responsibility norms in the relevant documents was ana-

lysed and interpreted as to their saliency, their range and diversity, and to excavate potential shifts in emphasis and discourse over time. This was then compared to the changing norms and categories that we found in analysing the government's policy documents.

The case of the Netherlands

Compared to its beginning in the 1950s, the TV broadcasting system in the Netherlands has undergone dramatic organisational changes. In that light, we can subdivide the time span of our research project (1960-2000) into three, subsequent chronological periods: the *old public order* (1960-1980), the *transitional period* (1980-1990) and the *new dual order* (1990-2000).

During the old public order, society was characterised by religious and ideological *pillars,* more or less homogenous societal streams that structured the social order from cradle to grave, and from political party to media and voluntary organisations. Up into the 1960s the broadcasting system reflected and reinforced the existing social and political order, with journalists performing a platform function for the elites of the different pillars, informing the rank and file as well as creating consensus and stability (Brants & McQuail 1997, Bardoel 1997). The organisation of the broadcasting system in this period (1955-1980) is characterised by non-commercialism, representation of the *pillarised* structure and – from the end of the 1960s and marked by the 1967 Broadcasting Act – controlled access for new broadcasting institutions. The organisations' most relevant policy documents studied for this period are two memoranda, one on a proposed *Law on Broadcasting Regulation* (1966*)* and one on the *Principles for a Joint Programme* (1969*)*.

The second, transitional period (1980-1990) is characterised best as a time of defence, preserving and protecting the public monopoly of the existing broadcasting system. Following the rapid development of new transmission technologies in an already heavily cabled country, the first cracks in the system became visible. The combination of satellite and cable, and the possibilities this opened (although still refused) to national private investors, could no longer hold off foreign commercial institutions. Satellite broadcasters, for example, were not hindered by any necessity to comply with national regulations. The government responded with a White Paper (1983) and a new Media Act (1987), designed to maintain the existing system. The broadcasting organisations' most relevant policy documents studied for this period are the *Comments on the Government's Media Memorandum* (1984) and a memorandum on *Future Policy for Dutch Broadcasting* (1989).

At the end of the 1980s and in the early 1990s a new dual order was formed in which commercial broadcasters were admitted to the delicately balanced Dutch system. The number of national television channels rose from 2 in 1987 to more than 10 at the turn of the century, only 3 of which were pub-

lic. With the audience fragmenting over the different channels, the audience share of the public channels dropped considerably from approximately 80 percent in 1988 to just under 40 percent in 2000. The government papers and acts reflect the changing situation and no longer staunchly defend the public system per se. The three most relevant memoranda of the public broadcasters studied for this period are all answers to the future public broadcasting order in a changed media environment: a *Differentiated Order* (1991), *The Power of Pluralism* (1996) and *Making a Difference* (2000).

Government policy

Our research on the government's policies concluded that, at first glance, the general policy principles originating from the old public order have not changed dramatically over time. However, in these three periods we also noticed three concurrent tendencies (Bardoel et al. 2000: 95ff). First, there was an increase in the *diversity* of SR-norms used in the various policy documents. A growing awareness of the importance of national programme production indicates an increase in the concern for national identity. There is also growing attention to the exchange of European culture, for the quality of programming and for the independence of the broadcasting system from governmental and economic influences. In addition, different social groups cutting across traditional segments, including minority groups, the elderly and the unemployed, are being addressed separately.

The second noticeable tendency was the growing *refinement* of SR-norm specifications. An indication for this development is the quantification of requirements concerning programme comprehensiveness, which was realised through the designation of quotas for several programming categories. This increasing norm refinement is also indicated by the allocation of specific amounts of airtime to nationally produced programmes. Finally, with the coming of the new dual order, the government papers showed a further increase and refinement of the social responsibility concept in light of social (*individualisation*) and economic (*competition*) changes affecting public broadcasting. There is clearly more attention to the audience-as-consumers, and programmes should thus not only have quality but also attractiveness. In interpreting these changes we detected four general tendencies and shifts.

- *From political to cultural motives*. The analysis of Dutch broadcasting policy legitimisation revealed a shift from predominantly political motives (related to basic values as communication freedom and democracy) towards mainly cultural motives (related to preserving national culture and identity). In the old public order, the main reason for government regulation was premised on a fair division of the scarce frequency spectrum between the traditional 'streams' segmenting Dutch

society. When in the 1960s the cohesion within the traditional pillars started eroding and new societal groups appeared, the government was pressured to grant these 'new segments' equal representation within the broadcasting system. During the transitional period, the political motives mentioned above remained an important part of policy legitimisation, but cultural motives also appeared in policy documents. There was more attention to cultural production and greater concern for choice, authenticity, creativity and quality of programming. With the arrival of commercial broadcasting in the new dual order, the legitimisation of broadcasting policy shifted more towards cultural motives.

- *From collectivism to individualism.* Our research showed that Dutch broadcasting policy in the new dual order tends to be primarily individualist and citizen-centred, while in previous periods it was more collectivist and state-oriented. In the old public order the Dutch broadcasting system was organised along the lines of social segmentation. Most issues regarding social responsibility were approached in a collectivist manner and applied particularly to broadcasting institutions. In the transitional period new social groups, distinguished by age, ethnic origin and life-style, fuelled the need for a more individualistic policy approach. The liberalisation process in the beginning of the new dual order-period induced another individualist policy approach: citizen and consumer protection. After the admittance of commercial broadcasters, there was great concern for access of citizens to the entire broadcasting system, and the maintenance of pluralist and independent programming for an increasingly diversifying society. Through more audience research and greater obligations regarding the responsiveness to its results, the answerability of the broadcasting institutions towards citizens increased.

- *From ambiguous to positive assessment of economic forces.* The influence of economic and market forces on the broadcasting system has been estimated differently for many aspects and across time. Some economic forces were assessed positively even in the old public order, but others more negatively, and again other forces were gradually considered less harmful to the broadcasting system. In each relevant policy document of the last three decades, the free market was considered an insufficient tool to guarantee the various policy goals regarding social responsibility of the broadcasting system. But the liberalisation of the media sector and the creation of the new dual order in the third period suggest an increasing confidence in economic and market forces. The market mechanism is by now considered to induce a more efficient use of resources and an expansion of choice. At the same time, however, many policy documents stress the importance of consumer protection from market failure.

- *From purely national to also minority cultures.* The attention to minority groups and different cultures in Dutch government policy has increased significantly since the 1960s. Whereas minorities were not (or only scarcely) mentioned during the old public order, minority groups have by now become a considerable element in Dutch broadcasting policy. That may sound like a paradox because the pillars themselves were the organisational structures for the emancipation of religious (particularly Catholic) and ideological (notably socialist) groups. But as these started to erode, the diversity of new societal groups, segmented along lines other than religion and class, increased. Because of the growing number of citizens of foreign origin, non-traditional cultures received more attention. Also, through the expansion of daytime broadcasts, the unemployed and elderly were catered for. It was also felt that the public system had to be more attractive to the young who seemed to be more interested in commercial than in public channels.

These tendencies demonstrate that the overall awareness of social responsibility, as reflected in the broadcasting policies of subsequent Dutch governments, has increased over time. It reflects both the increasing (discursive) struggle over public broadcasting in a dual and competitive system and the more critical stance of citizens and society towards the performance of social institutions and organisations in general. The shift towards cultural motives in broadcast policies seems a reaction to trends in the influx of cross-border television, the need to reposition public broadcasting *vis-à-vis* commercial broadcasting and, last but not least, a changing social composition of society. In a sense, it seems that in broadcast policies the old, modernist paradigm – with freedom and equality as the core values – is being replaced by a more postmodernist approach. There is more room for individual cultures, styles, and tastes and less for paternalistic policies, at least in a rhetorical sense. More generally, our impression is that the specificities of Dutch broadcasting policies and their legitimisation erode and are being replaced by more common, perhaps 'European' policy motives.

But to what extent do we see these changes in government policies reflected in policy documents of public broadcasters? Or do the public broadcasters instead negotiate and articulate their own discourse and problem definitions?

The PSB remit

Relying on the research method explained earlier, we wanted to picture the development of social responsibility in the policy documents of public broadcasters: what keywords, possible synonyms and related operationalisations do we see, and how has their saliency changed over time (see Table 1)? We notice here a number of developments.

Table 1.   SR norms 1960-2000

SR-Norms	I	II	III
Access to audience (3) *access to citizens*	•	•	•
Representativity (organizational)	•	•	•
Forum / communication between groups	•		•
Public responsibility	•	•	•
Comprehensive programming	•	•	•
public interest	•	•	
Religion	•	•	•
independence (government)	•	•	•
local/regional identity	•	•	•
Diversity (quality) *public responsibility*	•	•	•
News	•	•	•
Education	•	•	•
National identity	•	•	•
Autonomy	•	•	•
Availability	•	•	•
Entertainment	•	•	•
Balance (programming)	•	•	•
Culture	•	•	•
Diversity (quality) *programme supply*	•	•	•
Representativity	•		•
Information	•	•	•
public sphere	•	•	•
Art	•	•	•
Transparency	•	•	•
Freedom of speech	•	•	•
Objectivity (programming)	•	•	•
Security (state)	•		•
Continuity	•		
Non discrimination	•		
public order	•		
Minority groups/ sub cultural groups	•	•	•
Politics	•	•	•
Access to audience (2) *access to media*	•	•	•
right of reply	•	•	
Equality (programming)	•	•	•
Democracy	•	•	•
Opinion	•		•
Authenticity	•		•
Integrity	•		•
objectiveness (access to audience)	•		
public evaluation		•	•
Quality		•	•
Reach		•	
audience maximization		•	•
representation of audience interests		•	
audience optimization		•	•
audience preferences		•	•
Attractiviness		•	•
Objectivity (content)		•	•

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Table 1.   Cont.

	I	II	III
Communication within groups/Social Cohesion		•	•
Craftmanship		•	•
Non-commercial programming		•	•
access to audience (2) access to citizens		•	•
independence (econ. forces)		•	•
access to knowledge		•	•
social values		•	•
accountability (3)		•	•
access to audience (1) access to citizens		•	•
policy consistency		•	
Ideology		•	•
Access to audience (1) *access to media*		•	•
Creativity		•	•
balance (public vs. commercial)		•	
Choice			•
Reliability			•
Privacy			•
information selection			•
Innovation			•
accountability (4)			•
Accuracy			•
decency			•
information processing			•
accountability (2)			•
Comprehensibility			•
openness (access to audience)			•
responsible programming			•
Truth			•
accountability (1)			•
cultural integration			•
equality (access of audience) *access to media*			•
Factuality			•
fairness (access to audience)			•
Fairness (content)			•
universal service (access of audience)			•

Firstly, there is an increase of social responsibility notions: from 40 in the old public order (period I), via 53 in the transition period (II), to 74 under the new dual order (period III). Even if we take into account that in the same period the size of policy documents increased as well, the growth in diversity is significant (see also Table 2 – *in appendix* – which gives the numerical importance of the norms). This stronger elaboration and explicitness of these norms by the public broadcasters over time can be interpreted as a growing awareness of their social responsibility role.

Secondly, we see that certain notions remain present over time, while others disappear or, in some instances, reappear. Several traditional roles that media are expected to play for individuals in society – information, educa-

tion, entertainment – are present in all three periods. So are the content requirements (comprehensive programming, diversity, balance, independence, culture, art, objectivity, equality) which form not only the most elaborate list, but also reflect the anxiety we find in politics over the potential ideological power of the medium. Certain social goals to be reached (transparency, freedom of speech and, more generally, democracy) and social sectors that should recognise themselves in the programming (access, forum, religion, identity, minority groups) are also constant over time.

What disappear are notions like public order and continuity or (only in the transition period) representation, security, opinion, authenticity, integrity. This can either be a question of the self-evident nature of the notion or, instead, as the declining importance of the notion in a society that becomes more volatile and depillarised. New since the transition period are notions which reflect a mixture of responsiveness to audiences (public evaluation, preferences, accountability, access), awareness of new competition (attractiveness, quality, reach, audience maximisation) and emphasising the importance and quality of their existing functions (social cohesion, craftsmanship, non-commerciality, independence, creativity). Typical is the statement in the memorandum *The Power of Pluralism* that:

> It is self evident that both public and commercial broadcasters have an influence and a function in society. However, there are several reasons that the social function of public broadcasting should be fulfilled by public radio and television.

The reasons being its guarantee for (quoted):

- Reliable, independent, journalistically and professionally assembled and selected information;

- The provision of all programme types and constant quality;

- Functioning as an anchor for social identity, cultural unity and individuality;

- And being anchored in society.

The new dual order specifies new content requirements (accuracy, truth, factuality, fairness) and also new worries (privacy, innovation, decency, responsible programming, cultural integration). Decency seems especially remarkable in a country most deeply impacted by the so-called sexual revolution; in the governmental policy documents this notion disappeared conspicuously with the old public order.

Finally, we take a closer look at the three categories distinguished before to see whether we can refine the trends and the saliency detected (see table 3). The distinction between social responsibility referring to *content, media's role for society* or the *organisational status* of the broadcasters was applied

to the different norms found in the total summary. Because all policy documents are different in size, the table aggregates the total of relative values for each of the three periods.

Table 3. Saliency of SR-norms 1960-2000

SR-NORMS (in %)	Old public order (I)	Transition period (II)	New dual order (III)
Words total	14 548	31 623	61 172
SR-norms total	353	650	2 090
SR-norm density (%)	2,43 %	2,06 %	3,42 %
SR density, media content (%)	0,21 %	0,19 %	0,69 %
SR density, role for society (%)	0,87 %	1,06 %	2,24 %
SR density, organizations (%)	1,35 %	0,80 %	0,48 %
Attention to media content (%)	8,50 %	9,39 %	20,33 %
Attention role for society (%)	35,98 %	51,69 %	65,60 %
Attention to organizations (%)	55,52 %	38,92 %	14,07 %
Paragraph total	342	841	2 534
Line total	1 318	3 745	6 615
Average of SR-norms per paragraph	1,03	0,77	0,82
Average of SR-norms per line	0,27	0,17	0,32

Explanation: Words total: t*otal of words found in the document according to word count function in Microsoft Word.* SR-norms total: t*otal of SR-norms found in the document.* SR-norm density (%): p*roportion between total of SR-norms and total of word.* SR density, media content (%): p*roportion between total of SR-norms found within the category* Media content requirements *and total of words.* SR density, society role (%): p*roportion between total of SR-norms found within the category* The role of media in/for society *and total of word.* SR density, organizations (%): p*roportion between total of SR-norms found within the category* Organizational status *and total of words.* Attention to media content (%): p*roportion between total of SR-norms found within the category* Media content requirements *and total of SR-norms.* Attention to society role (%): p*roportion between total of SR-norms found within the category* The role of media in/for society *and total of SR-norms.* Attention to organizations (%): p*roportion between total of SR-norms found within the category* Organizational status *and total of SR-norms.* Paragraph total: t*otal of paragraphs in the document according to word count function in Microsoft Word.* Line total: t*otal of lines in the document according to word count function in Microsoft Word.* Average of SR-norms per paragraph: p*roportion between total of SR-norms and total of paragraphs.* Average of SR-norms per line: p*roportion between total of SR norms and total of lines.*

The table clearly shows that during the most recent new dual order the SR-norm density (the norms as a percentage of the total number of words) in policy documents is much higher than during the transitional period or in the old public order. It is remarkable, however, that the SR-norm density during the old public order was actually higher than in the transitional period. This might have been caused by the strong liberalization and so-called 'no nonsense' policies of the 1980s.

Focusing next on each category (concentration on content, society or organization), it is interesting to note an increase of attention (the relative percentage of each of the norms) for both medi*a content* and *role for society*

at the expense of *organizations*. In all three periods the norms focusing on the role of the broadcaster for society dominate (from 36 percent in the old public order to 66 percent in the new dual order). For the content requirements, with the exception of equality in programming and diversity (quality), the norms only come up after the first period, which seems surprising if one considers 'content' to lie at the heart of the public function of broadcasting. But this rather typifies the Netherlands, where the structure of external pluralism is considered to be enough to guarantee quality of programme content.

Discussion: Competition and legitimation

The first conclusion of this research is that the number, variety and frequency of social responsibility norms in policy documents of Dutch public broadcasters increased dramatically over time. Most SR-requirements simply did not exist in the old public order. They were introduced in the transitional period to become (only very recently) part and parcel of the new dual order. This clearly indicates that the legitimization of public broadcasters has become more overt, explicit and elaborate over time. The sheer increase in the length of policy documents underscores this, and seems a reflection of the development of the public broadcasting system from a more introverted attitude in a situation of monopoly to a more extroverted approach in the most recent period. Public broadcasters had to come out.

Comparing the vocabulary of the policy discourses of the government and that of public broadcasters, it becomes evident that both use very much the same language in their discourse. Only a few SR-norms (like interesting content, hierarchy/public responsibility, self-regulation/independence and equality/access to audience) are used only in government documents and not in broadcasters documents.

The same can be said when we look at the three general characteristics. There is a decline in attention paid to *organizational status* and growing emphasis on *media content* and *media's role for society* in both governmental and broadcasters documents. However, even in the new dual order the government's attention to organizational responsibility norms still form more than 50 percent of all norms mentioned in their policy documents (see Table 4). This finding can be explained by the role Dutch governments must play in regulating a highly complex and decentralized public broadcasting system.

The number of references to the institutional requirements and arrangements that organized the external pluralism of the 'pillarised' public broadcasting system in the Netherlands did decrease, however, in the recent period in both governmental and broadcasting documents. It is another indication of a shift from an internal to an external orientation of public broad-

Table 4. Saliency of SR-norms in governmental documents

	Old public order (I)	Transition period (II)	New dual order (III)
Words total	30 413	50 579	90 826
SR-norms total	544	758	1 656
SR-norm density (%)	1,79 %	1,50 %	1,82 %
SR density, media content (%)	0,07 %	0,08 %	0,25 %
SR density, role for society (%)	0,45 %	0,48 %	0,64 %
SR density, organizations (%)	1,27 %	0,94 %	0,93 %
Attention to media content (%)	3,68 %	5,41 %	13,65 %
Attention to role for society (%)	25,37 %	32,19 %	35,27 %
Attention to organizations (%)	70,96 %	62,40 %	51,09 %
Paragraph total	794	1 505	2 794
Line total	2 374	4 994	7 982
Average of SR-norms per paragraph	0,69	0,5	0,59
Average of SR-norms per line	0,23	0,15	0,21

casters, and of more attention for media performance in terms of content or output. It seems they are eager to follow the policy trends, especially in the most recent period. The legitimacy for (non-) policing seems to follow the same pattern: from an implicit and more ritualistic stance to a strategic function for policy. This trend is also reflected in the format and content of the documents over time. They change from purely reactive *vis-à-vis* government policies in the first period to a much more pro-active approach in the last period. On the basis of this, a more specific periodisation of the characteristics of social responsibility in governmental and broadcasting organizations' policy can be elaborated (see Table 5). To be sure about this, however, more qualitative and contextual research is needed.

Table 5. Periodisation of social responsibility in broadcasting policy

	Old public order 1960-1980	Transition period 1980-1990	New dual order 1990-2000
Number of SR-norms	40	53	74
SR-norm density (%)	2.43	2.06	3.42
Government policy emphasis	Organisation	Organisation	Organisation/ Role for society
Broadcasters policy emphasis	Organisation	Role for society, Organisation	Role for society, Content
Policy legitimacy	Implicit, internal, reactive	Ritualistic, external, reactive	Strategic, external, pro-active

In reviewing the policy documents of the public broadcasters we notice a stronger emphasis on public responsibility – the rising star in our search. The count moved from 16 via 46 to 184 references. There was also more

stress on programme content requirements and on the cultural tasks of public broadcasters, as well as more attention to the position of minorities of different kinds. The more positive assessment of economic forces and a focus shifting towards individualism, which we found in government policy documents, were practically absent in texts of public broadcasters. The first is not surprising in a competitive media market, while the second seems to reflect the ambiguity public broadcasters have in combining a role-orientation towards audiences as individuals and as socially cohesive groups.

Our study thus shows that public broadcasters have learned to legitimize their *raison-d'être* more explicitly since the coming of competition, and to formulate their mission less in terms of organizational arrangements and more in terms of the program content they offer and the role they play in society. At the same time, social responsibility is no longer the exclusive asset of public broadcasters. It is a contested claim also relevant for commercial broadcasters that are supposed to behave responsibly and be accountable. But these claims are the subject of the next stage of study.

The evidence from the past decade indicates that national policies and specificities are being replaced by a kind of common European framework of broadcast policy. In fact, the EC Directive *Television without Frontiers* of 1989 marks the end of national public broadcasting monopolies and the beginning of broadcast 'dual systems' in most continental European countries. At the same time, the EU could not fully escape the question of how the cultural interest in content production should be safeguarded. For the coming years it is clear that a cultural policy can no longer be formulated in negative or 'exceptional' terms only (as in the separate paragraph in the Maastricht Treaty or the additional protocol to the Amsterdam Treaty). A deliberate cultural policy for the old continent needs new and fresh reflection on the social responsibility of communications media in the information society. Documents on converging communications policies (European Communications Council, 1997; European Commission, 1997) begin to reflect the relevance of communication content's own merit, and not as a mere affiliate of economic and infrastructural (i.e. telecommunications) policies. In fact, we see at the supranational level the same learning process that national governments went through over the last half-century.

At the same time, it seems clear that the circumstances have changed so profoundly that a rethinking 'from scratch' of social responsibility in broadcast media is imperative. The recent shift of public hegemony to dualistic competition in broadcasting makes it more difficult to safeguard a certain standard of social responsibility and public morality. Even more so because, as a result of liberalisation, deregulation and self-regulation, the power to materialise this has shifted from the state to social institutions and commercial enterprises. Moreover, it is not yet clear what the predominant broadcasting policy model of the future will be. Will there be a continuation of the present situation of highly regulated public broadcasters and less regulated commercial broadcasters, or will a new policy be introduced in which

both public and commercial broadcasters share social responsibility and public duties (see Achille & Miege, 1994: 44)?

Partly as a result of this 'dual' media exposure, citizens have become more critical towards the social performance of enterprises and organisations. In the non-profit sphere, this trend towards direct accountability to the public forces organisations to redefine general legitimating goals more concretely and 'measurably'. Redefining goals and criteria has also been necessitated since old paternalistic imperatives, in terms of the cultural-pedagogic logic, are not taken for granted anymore. Social ethics have become more flexible, negotiable and individual, reflecting the changing social composition of (post) modern society.

All these trends require a more deliberate strategic policy of broadcast organisations in the future, in which public organisations no longer hold an exclusive claim on public duties, privileges and resources. After the first deluge of commercial broadcasting, this is also an important reason why there is a new political interest and backing for the subject of social responsibility in broadcast media.

Note

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Appendix

Table 2. Number of SR norms

	I	II	III
SR-Norms			
access to audience (3) *access to citizens*	140	113	61
Representativity (organizational)	35	18	13
Forum / communication between groups	17		5
Public responsibility	16	46	184
Comprehensive programming	14	13	14
public interest	12	5	
Religion	11	8	29
Independence (government)	9	14	6
local/regional identity	7	42	31
Diversity (quality) *public responsibility*	7	11	83
News	6	27	99
Education	6	24	79
National identity	6	10	92
Autonomy	6	9	5
Availability	6	1	10
Entertainment	5	6	53
Balance (programming)	5	1	40
Culture	4	53	101
Diversity (quality) *programme supply*	4	12	157
Representativity	4		13
Information	3	21	125
public sphere	3	7	28
Art	2	10	67
Transparency	2	6	22
Freedom of speech	2	4	2
Objectivity (programming)	2	1	2
Security (state)	2		1
Continuity	2		
Non discrimination	2		
public order	2		
Minority groups/ sub cultural groups	1	29	124
Politics	1	6	10
Access to audience (2) *access to media*	1	6	7
Right of reply	1	6	
Equality (programming)	1	1	5
Democracy	1	1	1
Opinion	1		12
Authenticity	1		10
Integrity	1		4
Objectiveness (access to audience)	1		
public evaluation		46	4
Quality		16	78
Reach		11	
audience maximization		9	5
Representation of audience interests		7	
audience optimization		6	9
audience preferences		5	61

Table 2. Cont.

	I	II	III
Attractiviness		5	36
Objectivity (content)		5	33
Communication within groups/Social Cohesion	4	33	
Craftmanship		4	17
Non-commercial programming		4	1
Access to audience (2) access to citizens		3	82
Independence (econ. forces)		3	3
access to knowledge		2	38
Social values		2	30
Accountability (3)		2	6
access to audience (1) access to citizens		2	5
policy consistency		2	
Ideology		1	24
Access to audience (1) *access to media*		1	21
Creativity		1	7
balance (public vs. commercial)		1	
Choice			39
Reliability			12
Privacy			9
information selection			7
Innovation			5
Accountability (4)			4
Accuracy			3
Decency			3
information processing			3
Accountability (2)			2
Comprehensibility			2
openness (access to audience)			2
Responsible programming			2
Truth			2
Accountability (1)			1
cultural integration			1
equality (access of audience) *access to media*			1
Factuality			1
fairness (access to audience)			1
Fairness (content)			1
universal service (access of audience)			1