



## Article

# Transparency Policies in European Public Broadcasters: Sustainability, Digitalisation and Fact-Checking

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**Abstract:** Over the last few years, European public broadcasters have promoted the concept of public service media as one of their main values. To this end, transparency policies have been implemented as a mechanism of corporate projection by strengthening their role as an essential service. The objective of this article is to ascertain the existence of this type of policies among European public broadcasters. To this end, a nominal group was made with 24 experts who were surveyed, thus generating new indicators of transparency and accountability strategies around sustainability and digitalization. The contents of the websites of RTVE (Spain), RTP (Portugal), France TV (France), RAI (Italy), BBC (UK), RTÉ (Ireland), ZDF (Germany), VRT (Belgium), and SVT (Sweden) were also analyzed, paying attention to such indicators and strategies. The main results include the identification of differences on the basis of the ideal models described by Hallin and Mancini; a commitment to credibility (fact-checking) to the detriment of diversity of opinions; and a connection between the political system and the media system, which, preliminarily, determines the level of transparency of these public entities.

**Keywords:** public television; transparency; sustainability; digitalization; fake news; fact-checking; journalism; public services; political news



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## 1. Introduction

European public broadcasters have made considerable efforts over the last decade to improve their transparency policies and their management systems in order to recover their legitimacy, which, in some cases, was lost, while strengthening their commitment to society and their democratic nature (Hoynes 1999; Balkin 1999; Thomass 2016). These policies have been determined by their relation to the political and institutional system through the normative dimension, but also through the influence of the state on their structure as a definer of what makes news.

Digital society has not substantially changed the frameworks that render a public broadcaster more or less transparent, the first and most important factor being the willingness to be transparent. What it has certainly brought about, however, has been a media convergency that has led to major changes in internal organization with an increasingly competitive market and laws and regulations that must adapt to the digital revolution, thus resulting in more complex models of governance (Iosifidis 2011; Arriaza Ibarra 2012). In this regard, transparency has become a central factor in political and social life, generating a “culture of transparency” (Owetschkin et al. 2021) on which new ethical criteria derived from artificial intelligence are impacting (Barceló-Ugarte et al. 2021).

To the multilevel governance model (Azurmendi and Muñoz 2016), we should therefore add an objective of transparency based on the opening of data, the dialogue with stakeholders, and the diversity of opinion in news. The development of information and knowledge technologies, as well as opening more effective channels for the accountability process, generates new challenges for all public broadcasters, including those connected

to automation, robotization, or big data (Túñez-López et al. 2019). The latter has an impact on both the manner in which news is generated and the internal management of the organizations, as well as on audience shares.

Consequently, this article takes as its starting point those articles in the literature that analyze the level of transparency of public broadcasters (Azurmendi 2015; Costa-Sánchez and Túñez-López 2017), as well how this transparency is communicated (López-Golán et al. 2018) and the participation (Chaparro-Domínguez et al. 2021). In this case, a three-pronged analysis was made: (a) the assessment of both old and new values of transparency through a nominal group with 24 experts; (b) the generation of new indicators, particularly those linked to digitalization, equality, or sustainability; and (c) the observation, through the corporations' websites, of the strategies within a general policy of transparency. To this end, the public broadcasters of Spain, Portugal, France, Italy, the United Kingdom, Ireland, Germany, Belgium, and Sweden were studied. The aim of the study is to analyze the transparency policies found in the European public broadcasters.

### *1.1. Transparency Policies and Their Communication*

The economic and institutional crisis that has taken place in the world and that has particularly affected Europe since 2008, but also the crisis generated as a consequence of COVID-19, has led to a questioning by citizens of the legitimacy of both actors and institutions (Villoria 2014). Following the pandemic, as well as a change in the content generation routines and the creation of new social and educational programs (Fieiras-Ceide et al. 2020), there has been an increase in the corporate projection of public broadcasters, which has strengthened their role as an essential service (Túñez-López et al. 2020). In this regard, the improved access to public information and the development of effective accountability mechanism has resulted in an improvement in reputation, stability, and democratic quality (Alonso-Muñoz and Casero-Ripollés 2017).

This free access to information, in order for it to be effective, must be understandable, accessible, and comprehensive. Therefore, mass media, particularly public broadcasters, have realized that they need to improve the communication of those processes related to the internal management of (institutional or economic) collective resources and how they are projected externally, whether it is through individual mechanisms (right of access or assessment of contents) or through corporate mechanisms (institutionalized with the relation established with stakeholders). Through these mechanisms, and in compliance with UNESCO guidelines, citizens are offered quality of life in two ways: individually as a social, educational, and participatory tool; and socially as a generator of opportunities for the development of innovation, technology, and the economy.

Over the last five years, transparency policies, within a framework of reflection on their virtues and their structural limits (Tsetsura and Kruckeberg 2017; Crain 2018) have evolved and no longer fall under the much more generic rubrics of "good practices" and "corporate social responsibility", and they have also abandoned the static approach that differentiated three types of transparency (Heikkilä et al. 2012): information on the company, news making, and accountability. Similarly, participation in both the content and the structure of media is generally poor and referential, and new communication and innovation strategies need to be explored (López-Cepeda et al. 2019). The same is true in the management of the communities, which is rather unattractive and very much conditioned by the rigid structures of corporations (López-Golán et al. 2019).

The communication of transparency policies is based on the validity of the values of public broadcasters, which are institutionalized by the BBC. The public media, therefore, generate communicative narratives on the basis of the contribution they make to society, adapting to their demands in the face of the emergence of new needs (Rodríguez-Castro and Campos-Freire 2019). Over the last few years, the tests of public value have been undertaken in places such as the United Kingdom, Norway, or the Netherlands, thus questioning the ex ante validity and necessity of these mechanisms in the context of a multimedia platform (Rodríguez Castro et al. 2019).

### 1.2. *The Management of Public Service Media (PSM) and Their Journalistic Independence*

Public broadcasters, especially in Europe, are the main state-owned media companies (Donders 2011). In the last few decades, they have lost ground in the media system as a result of the emergence of a great deal of privately owned media, and more recently, with the advent of new internet-based platforms. This fact has bolstered the interests of those in charge of public radio and television stations in generating added value through reputation enhancement and the promotion of the notion of public service media (PSM).

Public broadcasters are experiencing a constant crisis that involves such aspects as their legitimacy before citizens and their very business model, which conditions the necessary adaptation to the digital ecosystem. They also face the opposition of private operators; populist political parties, which call their existence into question; and the constant thirst for manipulation by the governments (Campos-Freire et al. 2020). In fact, the political proposals at a European level are linked to the reinforcement of their journalistic independence and to the establishment of greater collaboration tools among EU members, including the creation of a European public broadcaster (Rodríguez-Castro et al. 2020) in the new digital environment, driven by a process of active transparency and committed to such values as sustainability and the control of fake news.

As far as management is concerned, there are four major models for the management of public broadcasters (Hallin and Mancini 2008), which are not mutually exclusive, as hybrid formulas may also be used. The first of these models is the government model, which is characteristic of the more recent democracies in Southern Europe (Greece, Portugal, or Spain), where there is a more or less explicit control on the part of the government or the political majority in parliament. Second, there is the professional model, which is exemplified by the BBC in the UK or the Canadian public broadcaster, with a solid tradition of independence from the political power and a model of institutionalized participation by the journalists working in the public broadcaster. Then, we have the so-called parliamentary model, or model of proportional representation, which is very similar to the first one, but which depends on political parties (for example, RAI). This specificity is the consequence of the distribution and balances of power within the state, which seeks to represent a wider political majority or, at least, the government coalitions. Finally, there is the civic or corporate model, where control goes beyond political parties to include social groups, thus establishing connections with stakeholders.

There are several aspects that have a bearing on the transparency and accountability of public broadcasters, most notably the management model of the corporations and the relation that the state (whether it is through its subsidy policy or the defining of news) establishes with the media system as a whole. In this regard, the tension between journalistic independence and control has effects on news contents and editorial policies, but also on transparency policies. It has been the digital environment that has more strongly prompted the transformation of the participation and the relation between members of the public and PSM. As a result, among the main innovations is monitoring (Alonso-Muñoz and Casero-Ripollés 2017), which is able to articulate mechanisms that lead to greater citizen involvement in the structures of participation of the media, taking into account the articulation of the communicative and legal dimensions. It is for this reason that the transparency policies of public broadcasters are determined by a fourfold condition: (a) the management model, (b) its relationship with the state and the political system, (c) its commitment to the dissemination of the values of the PSM, and (d) an effective resolution of the tension between government control and journalistic independence.

### 1.3. *Funding and Management Models of the Countries Analysed*

The funding models of the European public broadcasters are diverse and have been influenced in the latest decade by three fundamental aspects that have indirectly had an impact on an increased demand for transparency: (a) the economic crisis that started in 2008, (b) the loss of legitimacy of public services, and (c) the process of technological convergence. These models, by virtue of their income, rely on four major sources (Lowe and

Berg 2013): license fees (the most widely used), advertisement, subscription, and subsidy, as well as others such as the marketing of broadcasting rights (Juanatey-Boga et al. 2018). On this basis, the European Broadcasting Union laid down four essential principles for the funding system of the European public broadcasting service: stability, independence, accountability, and transparency (EBU 2017). In the last decade, and on the basis of global figures provided by the European Audiovisual Observatory, a number of differences can be identified in the funding of broadcasters, which need to be approached on the basis of the different models (Juanatey-Boga et al. 2018): firstly, the countries in the south of Europe have not seen their funding increased, whether because of deep cuts (Portugal and Spain) or the freezing of the license fee (France and Italy); secondly, the countries under the corporatist model have seen a moderate increase (Germany), a remarkable increase (Belgium), or a huge increase (Sweden) in funding; finally, public broadcasters from the Atlantic model have had different outcomes, with increases in the case of the British public broadcaster and a cut in the case of Ireland. Overall, the German and British broadcasters (ZDF and BBC, respectively) stand out as far as income is concerned, whereas the funding of the Spanish RTVE is scarce relative to the size of the country (Corbella 2020).

Another fundamental aspect that has historically influenced the funding of European public broadcasters has been the role of the state (not only as an auditor but also as the proprietor) and its influence on the media system. In this regard, each of the models described has common, as well as divergent, characteristics. For instance, in the polarized plural model of Southern Europe, in both Spain and Portugal, the public broadcaster was not conceptualized as a public service (Bustamante 1989). In Portugal, the management of the broadcaster was not subject to control (Traquina 1995), and in Spain, it has gradually evolved from a mixed commercial state-owned system (with advertising and subsidy) to the current one, where advertising has been abolished as a consequence of the demand by the European Commission (which has also affected France) on the rates of business volume of the telecommunications operators (Jivkova Semova 2011). In the case of Italy, unlike the rest of the neighboring countries, it was conceptualized as a public service, although, in 1976, the Italian Constitutional Court “declared void the monopoly of the RAI and from that year until 1990, Italy had no law governing the public broadcaster” (Hallin and Mancini 2008, p. 115), which also had an impact on its financing. As to the economic management of the liberal model, the news companies are more subject to commercial interests. A good example of this is the BBC or the RTÉ, where political independence comes with certain economic independence. Finally, the corporations in the democratic corporatist model show notable differences in their methods of financing, partly due to the internal plurality of the state and the participation of sub-state agencies in governance.

## 2. Materials and Methods

This article is a continuation of the line opened by previous studies on the transparency and access to public information as a theoretical and epistemological construction (López-López et al. 2021), as well as those works seeking to analyze the public information on the websites of broadcasting corporations. A mixed methodology has been used, consisting of a nominal group (Silverman 2016) combined with a content analysis technique (Krippendorff 2004) in the form of a questionnaire and a strategy sheet with ad hoc indications. The study consisted of three parts.

Firstly, a nominal group was made (Gallagher et al. 1993) with the 24 scholars who were asked to assess 31 aspects of transparency on the basis of the following question (Table 1): “Rate in a scale of 1 to 5, with 1 being least important and 5 most important, the aspects that must be considered by public broadcasters and their corporations as the subject of active publicity and transparency in their respective websites”. In this regard, all 24 respondents were selected taking into account their education (all of them hold a PhD in the field of social Sciences) and on the basis of geographical diversity (we had participants holding teaching positions in Latin America, Europe, and the USA). Most of the scholars selected for the nominal group were researchers in the field of journalism, audio-visual

communication, political science, and sociology, although, to a lower extent, they also included professionals from public television networks or companies and managers of news companies working in a variety of departments. Their connection with transparency policies and governance management is underpinned by two aspects: first, most of them had contributed to the project “New values, governance, funding and public audiovisual services for the Internet society: European and Spanish contrasts” (2019–2021) financed by the Spanish Ministry of Innovation and Universities, as well as to the project “Indicators of governance, funding, accountability, innovation, quality and public service in European broadcasters applicable to Spain in the digital context” (2016–2018), financed by the Spanish Ministry of Economy and Competitiveness. Secondly, they had contributed to research into regulatory policies and strategies involving the European Union (EU), the states, and the corporations themselves on transparency issues. A balanced participation between men and women was achieved, and the anonymity of their responses was ensured. On the other hand, the 31 aspects included indicators that were used in previous studies (López-López et al. 2017), as well as new ones, in order to establish a list of indicators arranged on the basis of the importance they were given. The list is presented in tables and grouped in blocks.

**Table 1.** Indicators discussed.

Block	Indicator
Institutionality, governance, and stakeholders	History of the broadcaster
	Applicable laws and regulations
	Charter of the corporation
	Members of the Board of Governors
	Declaration of personal assets by the members of the Board of Governors
	CV of its Director General
	Information on CSR
	List of stakeholders
	Codes of good corporate practices
	Accountability report
Economic and infrastructure management	Budget and financing
	Monthly budget performance report
	Buyer’s profile
	Exploitation of rights to big events
	Breakdown of investment in R&D&I
	Directory of job titles
	Equality policies
	Corporate sustainability
	Social sustainability
	Innovation, automation, and big data strategies
Production of information, participation, and inclusion	Style guides/Editorial codes of practice
	Information on the Viewers’ Ombudsman
	Audience share data
	Quality assurance mechanisms
	Quality control mechanisms against fake news
	Queries and complaints channels
	Archive of contents
	Digital literacy activities
	Manners of participating in structures and/or contents
	Directory of experts and opinion-makers
Production of political news and the representation of social groups	

Source: prepared by the authors.

Secondly, and on the basis of the results of the nominal group and following a bibliographic review, the second part of this analysis added 12 new indicators on transparency and accountability in European public broadcasters so that they may be incorporated into the current methodologies of study in this field, including specific aspects on the digital revolution, accountability, and equality. They are grouped in three major blocks (institutionality, governance, and stakeholders; economic and infrastructure management; and the production of information, participation, and inclusion). As a result of the contribution of the nominal group, it is suggested that for qualitative purposes seven communication strategies on public broadcaster transparency should be added, which will be incorporated into the quantitative analysis of the indicators.

Thirdly, through the above panel of 12 indicators divided into three blocks, and taking into account all 7 strategies, the accountability processes and the transparency policies of the following TV broadcasters were studied on the basis of the criteria of publicity, expositive clearness, and accessibility between 20 March and 20 April 2021 on the basis of work organization criteria and the availability of researchers (Table 2): RTVE (Spain), RTP (Portugal), France TV (France), RAI (Italy), BBC (UK), RTÉ (Ireland), ZDF (Germany), VRT (Belgium), and SVT (Sweden). Each indicator was assigned a value on a scale out of 100: achieved (✓), partially achieved (P), and not achieved (X), with the following scores of 8.3, 4.18, and 0, respectively. The choice of these corporations was based on economic and demographic criteria (Spain, the UK, Germany, Italy, and France), on their characteristic regional model (Belgium), and because they represented the models described by [Hallin and Mancini \(2008\)](#) on Comparing Media Systems (Portugal, Ireland, and Sweden). As a result, the public broadcasters of the polarized pluralist model, those of the North Atlantic or liberal models, and the democratic corporatist model are represented. In the analysis conducted by the authors at the beginning of the 21st century, only 18 western democracies were analyzed (nine countries from Northern and Central Europe, five countries from Southern Europe, and four from the Atlantic), with two preconditions: (a) the existence of competitive political systems with free elections, and (b) the existence of public and private media within a consolidated system with clear rules. On this basis, the present article takes into account this analysis to select several public corporations from each model while excluding other states such as, for instance, those from Central or Eastern Europe.

**Table 2.** European public broadcaster corporations analyzed.

Model	Country	Corporation
Polarized pluralist	Spain	Corporación de Radio y Televisión Española, S. A. (RTVE)
	Portugal	Rádio e Televisão de Portugal (RTP)
	France	France Télévisions (France TV)
	Italy	Radiotelevisione Italiana (RAI)
North Atlantic Model	United Kingdom	British Broadcasting Corporation (BBC)
	Ireland	Ireland's National Television and Radio Broadcaster (RTÉ)
Democratic Corporatist Model	Germany	Zweites Deutsches Fernsehen (ZDF)
	Belgium	Vlaamse Radio- en Televisieomroeporganisatie (VRT)
	Sweden	Sveriges Television (SVT)

Source: prepared by the authors.

The general objective of this study and its research was to ascertain the existence of policies of transparency in European public broadcasters. The research questions were the following:

- Q1: Are the new aspects related to equality, the environment and digitalization the ones that are the most highly valued by experts and corporations?
- Q2: Is the production of news, especially political news, what determines part of the justification strategies by European public broadcasters as a public service?
- Q3: What are the main communication strategies used by corporations in order to communicate transparency?
- Q4: Is the level of transparency of broadcasters determined by a specific model of relation between the political system and the media system?

### 3. Discussion

Authors should discuss the results and how they can be interpreted from the perspective of previous studies and of the working hypotheses. The findings and their implications should be discussed in the broadest context possible. Future research directions may also be highlighted.

#### 3.1. *The Opinion of Scholars: A Ranking of Transparency Values for Broadcasting Corporations*

Of the rating (from 1 to 5) made by the group of experts on 31 aspects susceptible to being actively published on the websites of the broadcasting corporations, several issues are noteworthy (Table 3). The first is that all of them have ratings over 3.5, which means that great importance is given to each and every one of them. Equally, the difference between the highest (4.58) and the lowest (3.5) rating is slightly over one point, despite the number of responses obtained. On the other hand, the two indicators with the highest rating in importance are “Budget and financing” (4.58) and “Charter of the Corporation”. In other words, the expert approach to transparency is focused on key elements of an economic, financial organizational, or managerial nature. This fact is underscored by the fact that “CV of the Director General” (4.37); “Members of the Board of Governors” (4.33), and “Codes of good corporate practices” (4.33) are all in the first quartile. Other aspects that have to do with the very promotion of transparency, such as accountability, have a more modest rating (4.16), and the same is true of those related to the direct participation of members of the public and stakeholders (“Manners of participating in structures and/or contents”), which takes position 24 out of 31. Finally, it is particularly remarkable that the lowest ratings pertain to those aspects more closely related to purely journalistic aspects such as “Archive of contents” (3.62) or “Directory of experts and opinion-makers” (3.50), which has the lowest rating.

Upon grouping the aspects put to the nominal group of experts on the basis of previous literature on the indicators associated with transparency and access to public information among broadcasters, the differences between the first block (“Institutionality, governance and stakeholders”), the second (“Economic and Infrastructure Management”), and the third (“Producing information, participation and inclusion”) are minimal, such that specificities must be sought individually within each block (Figures 1–3).

Generally, the institutional aspects have more divergent ratings, thus underscoring the importance of the information at the top level, (a sort of “strategic apex”), while on the lower level we find those with a more referential nature (such as the “History of the broadcasting corporation” or the “Declaration of personal assets by the members of the Board of Governors”). Something similar occurs in the second block, with a positive assessment of “macro values” such as the equality strategy or corporate sustainability, but placing at the bottom more technical aspects that are harder to apprehend by the members of the public (“Buyer profile”, “Exploitation of rights to big events”, “Breakdown of investment in R&D&I”, or “Monthly budget performance report”). In the last block, which consists of aspects of a more purely journalistic and participatory nature, a split can be seen between two types of values: the ones with the highest rating, which are

those related to quality assurance, the identification of fake news, citizen protection, or style guide and, on the other hand, the ones with the lowest rating that have to do with very specific aspects of the journalistic profession (political news, content participation, directory of experts) or audience share data.

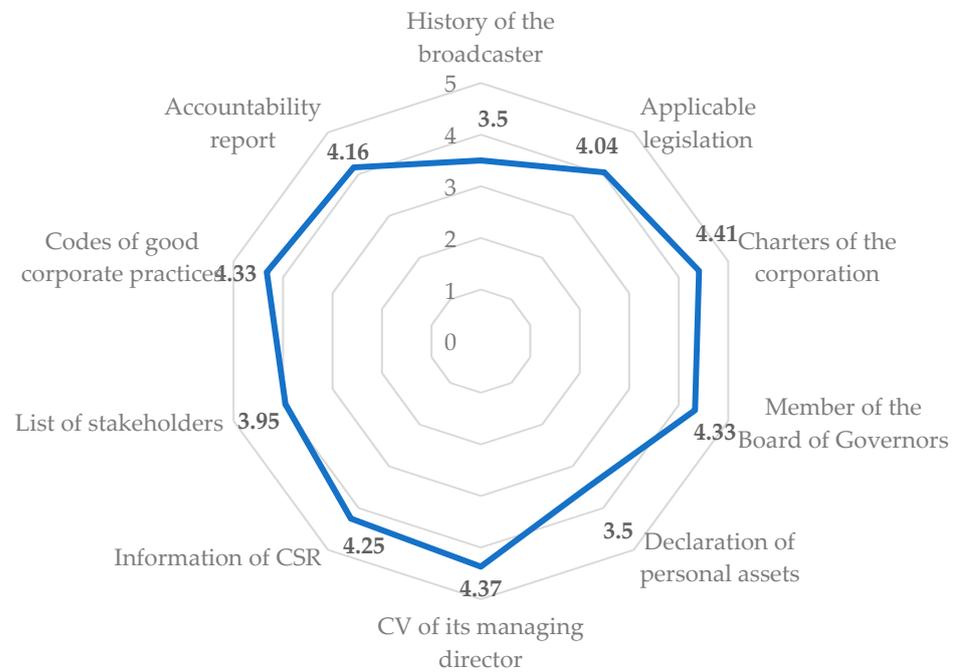


Figure 1. Average rating of responses by experts on the items that make up the “Institutional, governance, and stakeholders” dimension.

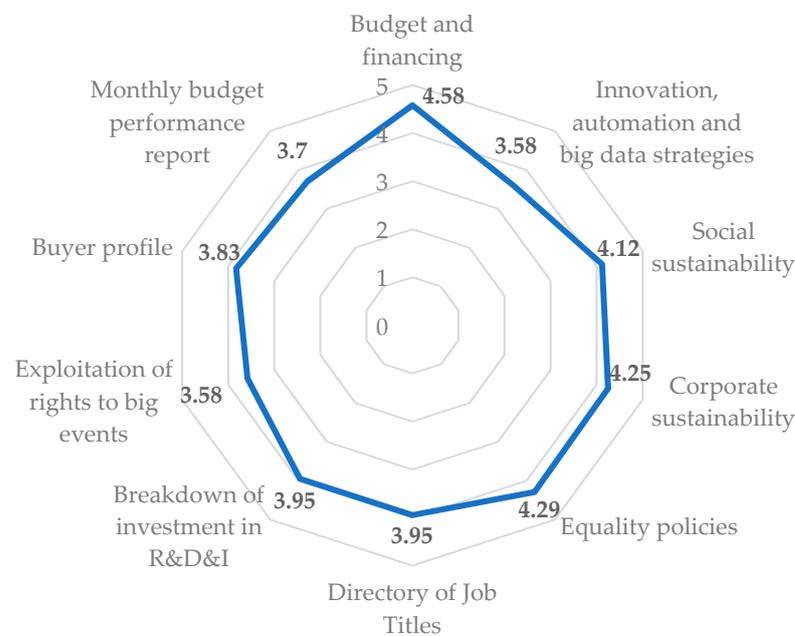
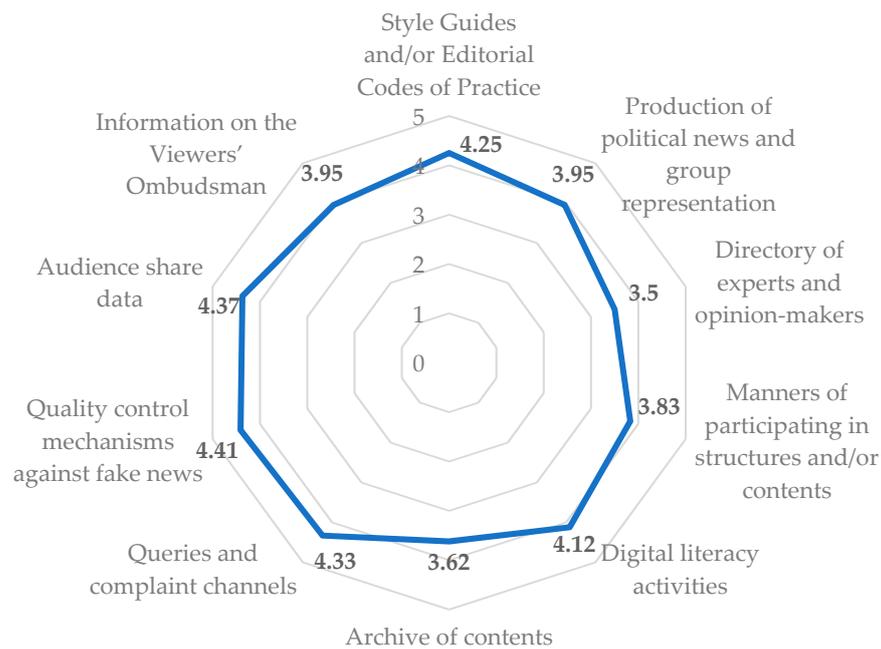


Figure 2. Average ratings of responses by experts on the items that make up the “Economic and infrastructure management” dimension.



**Figure 3.** Average rating of responses by experts on the items that make up the “Production of news, participation, and inclusion” dimension.

**Table 3.** Sorted list of transparency indicators on the basis of experts (average).

No.	Indicator	Average
1	Budget and financing	4.58
2	Charter of the corporation	4.41
3	Quality control mechanisms against fake news	4.41
4	CV of the Director General	4.37
5	Quality assurance mechanisms	4.37
6	Members of the Board of Governors	4.33
7	Codes of good corporate practices	4.33
8	Queries and complaint channels	4.33
9	Equality policies	4.29
10	Information of CSR	4.25
11	Corporate sustainability	4.25
12	Style Guides/Editorial codes of practice	4.25
13	Information on the Viewers' Ombudsman	4.25
14	Accountability report	4.16
15	Social sustainability	4.12
16	Digital literacy activities	4.12
17	Applicable legislation	4.04
18	List of stakeholders	3.95
19	Breakdown of investment in R&D&I	3.95
20	Directory of job titles	3.95
21	Audience share	3.95
22	Production of political news and representation of social groups	3.95
23	Buyer profile	3.83
24	Manners of participation in structures and/or contents	3.83
25	Monthly budget performance report	3.7
26	Archive of contents	3.62
27	Exploitation of rights to big events	3.58
28	Innovation, automation, and big data strategies	3.58
29	History of the broadcasting corporation	3.5
30	Declaration of personal assets by the members of the Board of Governors	3.5
31	Directory of experts and opinion-makers	3.5

Source: made by the authors.

### 3.2. An Integrated Model of Assessment: Strategies and New Indicators

As a result of the review work and the discussion of the data and the opinions of experts, seven potential communication strategies have been identified that are associated with transparency among European public broadcasters. Using the information on the websites of these corporations, the presence or absence of each of them can be registered.

- Strategy number 1: governance and regulation policies in the digital era. One of the main tensions (control vs. independence) of public broadcasters is solved by means of the proper management of governance and the publicity of regulation policies (Puppis 2010). These should be understood as those linked to decision making mechanisms and the control and management of collective resources.
- Strategy number 2: the institutionalization of participation and inclusion from the digital domain. The COVID-19 pandemic has demonstrated the importance of establishing and publicizing new participation strategies through the web, a central element for all public broadcasters. Thus, the institutionalization of the audience is established from two models (Carpentier 2011): a structural-related participation model and a content-related participation model. This strategy may be operated through proper digital channels that go beyond simple complaint letterboxes or vague mechanisms for rating programs.
- Strategy number 3: the relation with stakeholders. Whether directly or indirectly, European public broadcasters should systematically incorporate their relationship with stakeholders. This relationship should be accomplished in two phases. The first phase should be geared towards the creation of a great database that is built collaboratively, where the set of associations, institutions, or target audiences, including those resources that are susceptible to being shared and that will result in a strengthening of the connections is clearly and explicitly detailed. The second phase, mediated by applied technologies, should be aimed at institutionalizing a model of direct interaction between those in charge of the media and the stakeholders by managing private spaces, sharing operations plans, or action assessment tests.
- Strategy number 4: constant quality testing. Transparency policies must also be aimed at getting to know (and publish) what the journalistic approach of the corporation is, as well as its independence and quality assurance mechanisms. Therefore, there should be a comprehensive strategy on the ethical pattern for the processing of information while preserving its independence. This quality mechanisms or tests must be twofold: through surveys and by incorporating big data into market research.
- Strategy number 5: equality and integration. Policies promoting equality between men and women, as well those aimed at integration (in the widest sense of the term), are indispensable values in both public services and any other type of organization. Consequently, television broadcasters should include in their public information operative plans that clearly indicate the equal opportunity policies in both the strictly employment domain and the managerial positions. It is also indispensable that this is also true among the most popular faces and voices of the broadcasting company, whether they are presenters, collaborators or invited experts. As far as the latter is concerned, emphasis should be made on feminizing science. A good action is publishing a database that includes male and female experts in a variety of fields.
- Strategy number 6: (green) economic sustainability. There is a model aimed at visibilization; firstly, of the money the corporation receives from the treasury, the subsidies, or even advertising. Secondly, a criterion of investment and expenditures is clearly and explicitly detailed. Similarly, it is important to take into account that a good strategy for economic sustainability is the result of the clarity of labor relations (directory of job titles, for instance) and a management of collective resources with the systematization of accountability, emphasizing the public service elements, the business model, and the exploitation of rights.
- Strategy number 7: corporate sustainability (green). The commitment to sustainable development and conforming public broadcasters to the agenda 2030 are indispens-

able. As well as reporting on issues such as climate change and how it affects citizens as a whole, corporate sustainability must be an integral part of its corporate social responsibility, permeating the whole corporation and its philosophy of work. A specific aspect could be informing on the impact that television or radio actions have on the ecosystem and what has been done to minimize or reduce them as much as possible.

The second part of this analysis added 12 new indicators on transparency and accountability in European public broadcasters (Table 4), including specific aspects on the digital revolution, accountability, sustainability, and equality.

**Table 4.** New transparency indicators put forward.

Block	No.	Indicator
1. Institutional, Governance, and Stakeholders	1	Is there a specific section on the recommendations by the European Broadcasting Union with regard to the value as a public service of the corporation?
	2	Is information provided on the parliamentary mechanisms for the control over the corporation?
	3	Is there a person in charge/a report or similar mechanism on digital strategies?
	4	Is there a legislation, instruction, or strategy on transparency and good governance?
2. Economic and Infrastructure Management	5	Is there a laboratory or a similar department in charge of driving the development and transfer of new technologies and innovation applied to media?
	6	Is there a specific section or similar on the web devoted to CSR?
	7	Are specific sections related to the environmental sustainability of the organization identified?
	8	Is there a policy of equality between men and women?
3. Production of Information participation, and Inclusion	9	Are there terms of use for the forums and virtual communities available in the virtual communities on the website?
	10	Is there a public directory with the community experts on a variety of topics to which other media may resort to gather views and opinions?
	11	Are there effective channels for audience participation?
	12	Is there a formula on working in the context of digitalization, automation, robotization, or big data?

Source: made by the authors.

### 3.3. Rating of European

- RTVE: commitment to the digital environment (Strategies 1 and 4/66.40 points out of 100).

In the corporate section of the website of RTVE (<https://www.rtve.es/corporacion/>, accessed on 20 March 2021), there is extensive public information on institutional and economic issues, but there is not a clear transparency or good governance policy. Of the great strategies assessed, RTVE is oriented towards strategy number 1 and strategy number 4, whereas the rest are neglected. By way of illustration, no report has been published since 2018 on the fulfilment of the public service mission based on the 10 principles of the UN Global Compact with its stakeholders, which identifies progress in human rights, labor issues, or the environment. On a positive note, a “technological commitment” is adopted, whereby it is explicitly mentioned that the corporation is involved in the development of projects that reflect a commitment to applied technologies and sustainable development, although as far as the latter is concerned, no specific actions are mentioned (indicator 7).

One of the major achievements and commitments by RTVE is “Impulsa Visión RTVE”, which consists of three lines of work: the first one is aimed at driving innovative projects by professionals; the second is aimed at companies or academic institutions; and finally, the third is aimed at ideas or research work in higher education. At the beginning of 2021, the corporation developed an initiative to create real-time signal quality assessment tools and the use of artificial intelligence to measure the degradation between the processes of distribution and emission, which validates indicator number 12. It has also acceded

to the Digital Agreement on the Protection of Persons promoted by the Spanish Data Protection Agency.

Finally, exemplifying the clear commitment to the digital agenda and the breakthroughs in robotization, the application requirements for the third edition of “Impulsa Visión RTVE—Ayudas a la Investigación para Estudios Oficiales de Post-grado” (2020) include very specific aspects on AI: “Main AI technologies applied to automatic writing of text, scientific, technological, industrial foundations and feasibility of their use in audio-visual media”. On the negative side, further efforts are required on the part of RTVE to promote and communicate a more institutionalized participation in its structure (indicator 11).

- RTP: static and poor information (with no strategies/24.90 points out of 100)

It may be generally said that the publicity of the different strategies that have been considered as prior actions in this article is rather poor for Rádio e Televisão de Portugal (<https://www.rtp.pt/>, accessed on 25 March 2021), where only some (unstructured) aspects with regard to equality between men and women (indicator 8) merit some mention. In fact, the information available on the website is rather static, with rather watertight sections and outdated reports (a case in point is the sustainability report, which has not been updated since 2014). On the positive side, and as noted above, there is the Plano de Igualdade de Género, also updated in 2021, where a diagnosis of the situation of women in the corporation is made along with proposals for improvement. There is a generic statement on the social responsibility of the RTP, but with no operational plans or specific actions that can be followed up. There is no institutionalized or occasional participation policy either that allows citizens to participate or know about the main decisions taken by the corporation. Mention can be made of the fact that, although it does not fall under any specific transparency strategy, a generic code of ethics and a plan for fighting corruption are published. There is no relation with stakeholders beyond purely financial or quantitative issues, nor there is a digital policy or one focused on work and innovation involving applied technologies. Therefore, it may be said that the RTP does not show any strategy on its website and poor public information on the new indicators reviewed in the audit.

- France Télévisions: equality and inclusion (Strategies 2 and 5/55.95 out of 100)

The corporation France Télévisions (<https://www.francetelevisions.fr/groupe>, accessed on 25 March 2021) has a great deal of information on ethical aspects, good governance, CSR (indicator 6) and on participation on its website, which shows its clear commitment to a transparent management, seeking an institutionalized involvement of both citizens and stakeholders. In fact, it explicitly includes an ethic charter that incorporates such aspects as fighting fraud and corruption, the prevention of conflicts of interest or the respect for the environment, which is strongly focused on governance (indicators 1 and 2). Strategy number 2 is highly developed as there are new technology-mediated mechanisms in the form of a specific platform to this end, which makes it possible that different audiences participate in the business development and the contents of the corporation (mainly through the Conseil Consultatif des Programmes et aux e-Ateliers du Club Francetv).

Strategy number 5 is also reflected on the website. There is actually wide and extensive information (of a cross-sectional nature) on professional equality between men and women as a number of agreements are published. This strategy is of an inclusive nature (for instance LGTBI people), which is given concrete expression in a double certification: the seal of diversity and the seal of professional equality, which also allows for the validation of indicators. Additionally, widely documented are strategies number 6 and 7, which address environmental sustainability from a business and economic approach, albeit with no specific actions. They include mobility, resources, industry, energy, and the climate. On the negative note dragging down its rating, little or nothing is mentioned with regard to work on information and knowledge technologies, thus revealing an ill-defined digital strategy with no terms of use for both forums and virtual communities.

- RAI: preventing corruption (Strategies 1, 3 and 4/49.80 out of 100)

The Radiotelevisione Italiana has no site of its own and the dissemination of corporate strategies is included in the lower section of the general website (<https://www.rai.it>, accessed on 30 March 2021). It provides, however, very complete information on the company mainly based on strategies 1, 3, and 4. There is a clear policy of transparency and good governance by publicizing the decisions taken (governance), the relation with stakeholders through an ethical code (on rights, duties, and responsibilities), constant quality checking, and a section on corporate social responsibility (indicators 1, 2, 4, and 6). Testing is made by the marketing department of the RAI by resorting to different types of polls and surveys on contents and their public perception by the audience.

Another remarkable aspect of the Italian public broadcaster has to do with good governance, which is reflected by three aspects: firstly, its own space of “transparency” for the corporation that is orderly, clear, and understandable; secondly, a plan of transparency and corporate communication (strongly focused on hiring personnel); finally, a three-year scheme for the prevention of corruption (2021–2023) in aspects of management and coordination. Among the less defined or non-existent strategies are those having to do with equality (indicator 8), internal and external sustainability, or the digital agenda (indicators 5 and 12, respectively). In the case of gender equality, its focus is exclusively on contents (i.e., in the representation of women in television and radio contents), with no specific section on the news company. Similarly, “sustainability” is addressed only as far as accounting is concerned, but not with regard to the environment or its social dimension. Therefore, we cannot speak of green strategy in the case of RAI.

- BBC: an integrated approach (Strategies 1, 3, 4, and 7/83.00 points out of 100).

The British Broadcasting Corporation integrates through its website (<https://www.bbc.com/aboutthebbc/>, accessed on 4 April 2021) a large number of the new strategies designed for public broadcasting corporations. Generally, the transparency and accountability processes are very clear and are found across the website, as opposed to in a specific section. Its regulation policies are perfectly defined by providing a great deal of information and many (updated) reports where the different stakeholders participate on a sectorial basis, working as effective feedback mechanisms (Strategy 3). This translates into public value tests to measure the impact of the actions of the corporation on both society and the stakeholders. Similarly, the commitment to real equality between men and women (indicator 8) is among the priorities of the organization, as well as environmental and corporate sustainability (indicator 7). In fact, an extensive section of its corporate information is devoted to explaining the environmental sustainability measures it has in place, including Albert, the first carbon calculator used in television production that works out the carbon impact of making a program, thus leading to a reduction of the carbon footprint when producing all types of contents for the BBC and the audio-visual industry in the UK, as it is openly provided. On the negative side, it is not clear what the strategy of the corporation is with regard to the new challenges of the digital society beyond vague references to fighting fake news and the implementation of fact-checking. In fact, although there is a person in charge of digital strategies in the organizational structure, not a single specific action can be identified that is aimed at, for instance, the development and promotion of automation, robotization, and/or big data-based technologies applied to work.

- RTÉ: the green vision (Strategies 2, 6, and 7/74.70 points out of 100).

The company in charge of the management of public radio and television in Ireland (RTÉ, <https://www.rte.ie/>, accessed on 8 April 2021) has consolidated a policy of transparency that strengthens internal issues but neglects other community-related aspects and those related to stakeholders. On the other hand, one of the greatest efforts by this corporation focuses on strategy number 2 by institutionalizing inclusion (as far as content is concerned) from the digital domain, thus making an explicit acknowledgement of diversity in Ireland (diversity and inclusion in RTÉ). However, if there is something that characterizes the Irish broadcasting corporation, it is its extensive green strategy (sustain-

able and responsible as the fourth value of the company), its social (strategy 6), and its organizational (strategy 7) aspects. In fact, there are four sections in which environmental sustainability is mentioned: “Inside RTÉ”; “RTÉ and Sustainability”; “Recognising Our Sustainability” and “Access to Information on the Environment” (AIE). It is also mentioned in strategic documents for the corporation such as the “RTÉ Internal Audit Charter” or “Environmental Policy”, where emphasis is made on two strategic objectives: first, to reduce the environmental impact of the production process; second, to contribute to raising awareness among the organizations within the industry of the environmental aspect of their stated vision and their involvement in audience participation. In fact, the organization has been recognized by many national and international awards that endorse its respect for the environment.

On the negative side, other than a mention in the “Public Service Statement 2015”, the corporation does not implement a digital strategy nor details a clear business model focused on the horizon of 2030. There is no active mention of aspects such as automation or the existence of a laboratory or department whose objective is the development and transfer of new technologies and innovation to society.

- ZDF: an expansive view of transparency (Strategies 1, 6 and 7/74.70 points of out 100).

The website (<https://www.zdf.de/zdfunternehmen>, accessed on 12 April 2021) of the Zweites Deutsches Fernsehen (ZDF, Germany) has consolidated a policy of transparency (a culture of transparency) that is strongly focused on institutional and economic aspects, with a great deal of information and a data architecture with “internal information open and transparent to the outer world”. This information is extremely detailed and meshes with most indicators studied (it obtains a rating of 74.70 points out of 100), and the content of each section is clearly explained, acknowledging and justifying that some data are not included, and clarifying how data should be interpreted.

The two master transparency strategies of the corporation have to do with the following aspects: (a) extensive information and active publicity of the regulation policies, as well as of the supervisory and decision-making bodies (and accountability for such policies) and the follow up of aspects associated to aspects of public service value, such as the European Broadcasting Union; (b) fusion of the internal and external sustainability of the organization, with a clear economic and management strategy of the collective resources, as well as a commitment to their sustainable development with regard to society, adapting the mission, vision, corporate social responsibility, actions, and Public Service Value of the broadcasting company to this purpose. This second strategy is widely developed in a variety of spaces with such specific actions as “Climate protection and climate policy”, “Green production”, “ZDF Sustainability Objectives”, “Sustainability”, or “Commitment to society”. However, the digital strategy and the participation policies (structural-related participation or content-related participation) are not sufficiently explained or are confusing. In this sense, other than “generalities”, management reports do not include a comprehensive sequence that leads to the identification of aspects on the future of the broadcasting companies in the new digital society (indicators 3, 5, and 12).

- VRT: Quality and equality (Strategies 4 and 5/74.70 points out of 100).

The information on the website of Belgium’s VRT (<https://www.vrt.be/nl/>, accessed on 14 April 2021) is presented in a chaotic way, which prevents quick access to each of the sections through its site map. Its transparency policy is based on honesty. It explicitly states that as a limited liability company under public law, it may not publicize all the information with regard to its operation as it works in a competitive environment where disclosure of detailed information may harm its interests. One of its clearest strategies has to do with quality and its associated quality assurance mechanisms (strategy 4): its aggregated value takes into account the social relevance of VRT, as well as citizen “expectations”. It has, therefore, made a strong commitment to research into media, media literacy, and innovation. The latter ties in with digital aspects as well as reports and news that reflect on the impact of artificial intelligence on the credibility of news. In fact, part of this information

is included in the document “15 trends for the future”, which operate as indicators in the decision-making process of the news company. Another important strategy (5), which also falls under indicator number 8, is that of equality and inclusion, with specific sections for language and sexual diversity, although paying particular attention to gender equality. In fact, there is the so-called “Women’s Counsel”, which provides the corporation with advice.

Business sustainability and social impact are included in a static section entitled “We are committed to sustainability” or in a subsection under the title “Sustainable entrepreneurship”. However, in spite of including specific actions such as the tree planting campaign, they are not coordinated with the general strategy.

- SVT: Quality testing (strategies 1 and 4/58.1 points out of 100).

The communication of accountability on the website of Swedish public broadcasting corporation SVT (<https://omoss.svt.se/>, accessed on 20 April 2021) does not meet most of the new indicators put forward (yielding a rating of 58.1) as it is almost exclusively focused on strategies 1 and 4, while virtually neglecting the rest. In fact, as clear evidence of its independency, the letter of presentation of SVT explains that the corporation is owned by a foundation, “not being the property of the state or subject to commercial interests, thus ensuring its independence” so that the “control-independence” dilemma is resolved through this philosophy. Another positive point is the fact that its relationship with its different audiences takes place following a standardized protocol: surveys and polls are available that score the value that the broadcasting organization has for both individuals and the society on three values: credibility, quality, and trust. This fact is reinforced by an external survey that addresses public confidence in the media, presented as quality assurance. On the other hand, while there is not a digital policy “as such”, in the “digital services” section, there is actually information aimed at suppliers on the multiplatform development of the entity. This, although it is not mentioned in the organizational objectives, does allow us to validate indicator 5 as “partially met”.

SVT has superficial information on equality-related issues, with percentages of representation among journalists or in audio-visual contents, but it does not provide details about active equality policies, specific reports, or actions. The same is true for sustainable development, with vague references to “sustainability” in the section “Annual report, sustainability and current corporate report”. The public corporation has been publishing public service reports since 1997, but they are not logically linked to specific actions under the 2030 agenda or to a comprehensive strategy.

#### **4. Conclusions: Credibility and the Long-Standing Tension between “Control and Independency”**

The transparency policies of European public broadcasting corporations and their communication are constructed on the basis of a number of strategies that provide value to the corporations and that must be up to the highest standards of accountability. Emerging social values such as equality and environmental sustainability in a digital framework force organizations to rethink access to public information. Transparency, both theoretically and practically, goes beyond the publishing of data and reports on the website of the corporation to become something that must be approached holistically.

The information obtained in this study confirms previous research into institutional and economic transparency, as well as into the transparency in the production of contents by European public broadcasters (Palau-Sampio 2017; Costa-Sánchez and Túnuez-López 2017; Herzog et al. 2018), which differs from results in other latitudes (López-López et al. 2019) and which shows the specificities of the European media system (Campos-Freire et al. 2021). Similarly, this study shows the need to move forward towards more integrated and complex assessments with composite indicators so that other aspects such as social value or the efficacy in the management of the corporations can be measured (Blasco-Blasco et al. 2020).

The results obtained (Table 5), however, show an uneven commitment to the new social values, whether it is from the perspective of experts or the perspective of the audits conducted (Q1). In the former case, none of the values we brand as “new” appear on the first quartile as the most important according to experts; equally, there is not a clear “institutionalization” of them either on the websites of the corporations, with the exception of the two broadcasting corporations under the North Atlantic model (BBC and RTÉ). In the case of the broadcasting corporations of southern Europe, they have implemented very compartmentalized transparency strategies that are extremely focused on “classical” values such as the publicity of institutional and economic information. In this sense, there is no comprehensive policy on the role played by applied technologies in the development of news companies or their connection to audiences, with the partial exception of RTVE (the only public broadcasting company within this model together with France TV that has a passing mark after applying the indicators).

Another relevant aspect within the framework of news production can be summarized in a commitment by both experts and corporations to credibility to the detriment of plurality (Q2). The control of the production process of news (by citizens) leaves aside nominal issues (the existence of editorial boards, the corresponding ethical codes, regulatory and/or self-regulatory codes) to analyze in depth the need to publicize fact-checking mechanisms. Particularly striking is the fact that the directory of experts comes last in the assessment made by respondents. Also surprising is the low rating of the mechanisms of production of political news and the representation of the different social groups, which should be compared with the results of future studies.

As to the different strategies corporations have in order to communicate transparency (Q3), three broad conclusions can be drawn, each of them with its subtleties: the companies that come under the democratic corporatist model are committed to a strategy of transparency through quality assurance; those under the liberal or North Atlantic model generate data and actions aimed at a comprehensive green strategy; and, lastly, in the Mediterranean model there is a clear policy of governance and relation with the stakeholders, with the exception of TVE, which has a very clear commitment to the digital domain. Based on this, and as a response to the fourth research question (Q4. Is the level of transparency of broadcasters determined by a specific model of relation between the political system and the media system?) the answer is in the affirmative: the public corporations in the North Atlantic model are the ones with the best ratings, followed by those under the democratic corporatist model and last, those under the polarized pluralist model. This fact, as well as evidencing the possibility of applying these types of ideals to the analysis of transparency policies, introduces interesting lines of research on the influence of the control–independence tension on the dissemination of news.

To conclude, several aspects need to be identified that should be addressed in further research through the use of techniques such as interviews or discussion groups: (a) the existence of a strategy of transparency and good governance aimed at the use of applied technologies in the external domain of the corporation; in its relation with audiences; in the production of contents; and in research into automation, robotization, and big data; and (b) a corporate design aimed at the dissemination of aspects dealing with equality and sustainability that goes beyond annual reports, and one which is concretized in operative plans, actions, and measurements that make it possible for citizens to assess the efforts of the corporation to build a public broadcasting corporation that is committed to the new social values.

Table 5. Average indicators.

Indication No./Television Network	Polarized Pluralist Model				North Atlantic Model			Democratic Corporatist Model	
	RTVE 	RTP 	FRANCETV france•tv	RAI 	BBC 	RTÉ 	ZDF 	VRT 	SVT 
1. Is there a specific section on the recommendations by the European Broadcasting Union with regard to the value as a public service of the corporation?	P	X	✓	✓	✓	✓	✓	✓	✓
2. Is information provided on the parliamentary mechanisms for the control over the corporation?	✓	P	P	✓	✓	P	✓	✓	✓
3. Is there a person in charge/a report or similar on digital strategies?	✓	X	X	X	P	P	P	P	X
4. Is there a legislation, instruction, or strategy on transparency and good governance?	P	✓	✓	✓	✓	✓	✓	✓	P
5. Is there a laboratory or a similar department in charge of driving the development and transfer of new technologies and innovation applied to media?	✓	X	X	X	P	P	P	X	P
6. Is there a specific section or similar on the web devoted to CSR?	✓	X	✓	✓	✓	✓	✓	✓	P
7. Are specific sections related to the environmental sustainability of the organisation identified?	X	P	✓	P	✓	✓	✓	P	P
8. Is there a policy of equality between men and women?	P	✓	✓	P	✓	✓	✓	✓	P
9. Are there terms of use for the forums and virtual communities available in the virtual communities on the website?	✓	X	X	P	✓	✓	✓	✓	✓
10. Is there a public directory with the community experts on a variety of topics to which other media may resort to gather views and opinions?	X	X	X	X	P	X	X	X	P
11. Are there effective channels for audience participation?	P	X	✓	P	✓	✓	✓	✓	✓
12. Is there a formula on working in the context of digitalization, automation, robotization, or big data?	✓	X	X	X	P	P	X	✓	X
<b>Total Score</b>	66.40	24.90	53.95	49.80	83.00	74.70	74.70	74.70	58.10

Source: made by the authors.

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