

## **RADIOCENTRE SUBMISSION TO OFCOM CHANGES TO OUR FRAMEWORK FOR ASSESSING THE BBC'S PERFORMANCE CONSULTATION**

1. Radiocentre welcomes the opportunity to input into this consultation on changes to Ofcom's framework for assessing the BBC's performance. Given that the original performance measurement framework (PMF) was put in place in 2017 we recognise that it is right to review both its effectiveness and relevance.
2. We agree with Ofcom's assessment that the overall framework of four performance measures – availability, consumption, impact, contextual factors – remain appropriate and should be retained. However, we have concerns around some of the following proposed changes to the PMF.

### **REMOVING REFERENCES TO SPECIFIC DATA SOURCES**

3. The proposal in the consultation<sup>1</sup> to remove references to specific data sources used by Ofcom in its assessment of the BBC, in order to future proof the document, looks set to include sweeping changes instead of a more limited revision that is appropriate.
4. For example, the illustration in paragraph 3.4 highlights some data sources currently used in the PMF (outlined in Figure 1) which are now outdated, as well as new sources that are now used and yet not listed. Changes to data sources over time is expected to some degree and it is important that the PMF is accurate, so we recognise the rationale for updating the framework.
5. However, the proposals to ensure that the PMF does not contain outdated information appears to be based upon removing almost all the detailed information that is currently outlined in the guidance. We are concerned that removing explicit reference to long-standing, robust and independent data sources, such as RAJAR and BARB, risks diluting the integrity of these key trusted audience measurement services that underpin both the UK radio and television industries.
6. It is understandable that Ofcom and the BBC may wish to employ additional data sources that provide further audience insight, however we have concerns around the potential scope of the use and weighting of third-party sources or internal first-party data, particularly from the BBC, which is often presented in a limited way and lacking transparency. We recognise that Ofcom intends in future to set out the types of sources that will be used within the PMF, which is likely to be expanded over time. However, we wish to reiterate that for radio, RAJAR provides fundamental metrics that are essential to monitoring and measuring the BBC's delivery of its Mission and Public Purposes and

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<sup>1</sup> [https://www.ofcom.org.uk/data/assets/pdf\\_file/0025/261952/consultation-bbc-peformance-measurement-framework.pdf](https://www.ofcom.org.uk/data/assets/pdf_file/0025/261952/consultation-bbc-peformance-measurement-framework.pdf)

should not be diluted or understated. There is simply no other independent data source as comprehensive as RAJAR for assessing and interrogating audience behaviour in radio and audio in the UK. Therefore, it should remain the primary source for these purposes.

#### **REMOVING THE CONCEPT OF A ‘MINIMUM SET OF EVIDENCE’ FOR EACH PUBLIC PURPOSE**

7. We understand that Ofcom’s desire is to seek to provide a more comprehensive and robust range of metrics. However, it appears that rather than augmenting the range and level of detail required to assess the BBC’s performance, Ofcom’s proposal is instead to remove the detailed requirements altogether and simply provide information on a range of data, which risks being less comprehensive than the current requirement.
8. It is disappointing that while an example of the minimum set of evidence that is currently in place (Figure 2<sup>2</sup>) is used in the consultation, a direct example of what the new proposal will look like in reality is not provided. As a result, it is not possible to see clearly how the set of evidence requirements will change. Also, examples of how some metrics may be collated in order to save unnecessary repetition would also have been helpful to make an informed judgement on the proposal.

#### **EXPANDING THE SCOPE OF OFCOM’S APPROACH TO MEASURING IMPACT**

9. The proposed change to the existing description of the ‘impact’ performance measure to include the reference to “and examining the impact these services and outputs have on audiences”<sup>3</sup> is presented as necessary in the consultation to help Ofcom measure *direct* impact of BBC content on audiences, rather than simply *perceived* impact, to inform their assessments.
10. However, it is unclear from the limited explanatory notes within the consultation document what this is likely to mean in practice, other than giving Ofcom flexibility as their knowledge and work in assessing the impact of the public value the BBC provides evolves. Again, in order to provide an informed view, further information on the types of metrics that Ofcom expects to employ here would have been useful. We would propose the use of examples to illustrate the impact of these changes in future versions of the PMF.

June 2023

#### **ABOUT RADIOCENTRE**

Radiocentre is the industry body for commercial radio. We work on behalf of over 50 stakeholders who operate over 300 licensed radio stations across the UK and represent 90% of commercial radio in terms of listening and revenue.

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<sup>2</sup> Page 9, Ibid

<sup>3</sup> Para 3.14, Ibid