

### How to cite this article in bibliographies / References

P C López-López, I Puentes-Rivera, J Rúas-Araújo (2017): “Transparency in public televisions: development of indicators and case analysis in Spain and Chile”. *Revista Latina de Comunicación Social*, 72, pp. 253 to 272.

<http://www.revistalatinacs.org/072paper/1164/14en.html>

DOI: [10.4185/RLCS-2017-1164](https://doi.org/10.4185/RLCS-2017-1164)

# Transparency in public televisions: development of indicators and case analysis of Spain and Chile

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## Abstract

**Introduction:** The present research develops and suggests 29 indicators of transparency applicable to public televisions, to subsequently rehearse them experimentally with Televisión Nacional de Chile (TVN) and Televisión Española (TVE). **Methods:** Using the analytical method, these indicators are applied to the information available on websites of TVN and TVE, to finally score their level of transparency using a 0 to 100 scale. **Results:** The greatest transparency is observed in relation to the production of information and access to contents, followed by economic information. The greatest opacity is related to the institutional information and information regarding the directive staff. **Discussion and conclusions:** The level of transparency of TVN and TVE is the same, both got a score of 62,069 over 100. Besides, the validity of indicators suggested to evaluate the level of transparency is demonstrated and to establish equitable and objective comparisons between them, even though they should be broadened in the future.

## Keywords

Political communication; transparency; television; administration; accountability; public information.

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Translation by **Yuhanny Henares**  
(Academic translator, Universitat de Barcelona)

## **1. Introduction**

The development of information technologies and knowledge, as well as tools that citizens have, to make the monitoring of public and private activity effective, therefore turning transparency into an imperative of organizations, a public's right. This research starts from the concept of transparency as a key element within the dialogic process of political communications, made in bilateral or corporative environments by administrations and citizens. In this sense, it begins from an expansive, inclusive and not reserved nature, that is: it affects all institutions receiving public money, such as televisions or positions of political representation and officers and, besides, it has an influence in the opening of most part of data.

The objective to be achieved is the development of generic indicators of transparency applied to the information available on the websites of public televisions, to rehearse them afterwards in an experimental manner in the Televisión Nacional de Chile (TVN) and Televisión Española (TVE) using a qualitative analysis, taking the different existing laws (essentially, in Spain the Law 19/2013 of Transparency, Access to Information and Good Governance and in Chile the Law 20.285, dated 2008, about Access to Public Information) as baseline, as well as ethic precepts and recommendations of the European Broadcasting Union (EBU). Therefore, the proposal is mainly grouped into three main sets: indicators related to institutional information, economic indicators and indicators related to the production of information itself.

The relevance of this research is justified by its novelty, its theoretical value, its development in a field that has not been studied much and by the fact that it contributes with useful tools when it comes to accountability of institutions towards society, establishing transparency indicators for the first time in the sector of public televisions, which can be applied to any other broadcasting entity from any geographical location and that establish classifications and equitable comparisons between them.

### **1.1. Democracy and transparency: prevention of corruption**

Democracy and transparency, from the conceptual perspective and in its operative translation, are understood as inseparable. The access to all kinds of data in power of organizations by citizens, both to those receiving funds from the State and even private, is an indispensable requisite of democratic systems, to audit ordinary and extraordinary activities of powers and institutions ruled by the advertisement principle.

Hence, transparency is understood as access to information authorities have and the promotion of participation mechanisms and practices reducing therefore the possibilities of corruption (Pérez Bravo, 2004), through the dialogue produced in the political communication. In this sense, this article offers a theoretical and methodological collection with the purpose of evaluating the websites of public televisions in Chile and Spain, being the first one performed in a comparative approach using integrated indicators, and here lies the relevance of the issue, both regarding its development and operativity.

To have an effective representation and citizens' participation in public affairs, the relationship established between managers and the population must be guided by constant communication criteria, so to achieve a better channelling of citizen inputs so that, as a last resort, public policies can be developed. It is necessary to run away from the minimalistic concept in politics (discussions among politicians), which inevitably leads to a misconception of democracy. Politics shouldn't be simply instrumental (decision making), but it must be "self-technical", like an educational tool of citizens and not only voters (Maiz, 2009).

Therefore, in the relationship between citizens and government (through different institutions, like in this case televisions or their entities of public radio-television) there can be an indirect processing (representative democracy) and a direct processing (participative democracy). In this sense, transparency is a necessary tool for a triple function that intertwines in cascade: a) for access to public information in a systematic manner; b) for citizen empowerment; and c) for the construction of a participative democracy. So, we will understand transparency from a legal perspective where different laws must be respected, but also from an ethical and social responsibility conception, where the will of governors has an upmost importance (López-López and Medranda Morales, 2016).

Democracy is sustained in a broadened public space (Wolton, 1997) where the dialogic process of political communication occurs; in this case, performed in a bilateral environment between institutions and citizens, without the imperative mediation of mass media. Therefore, as more systematized, constant and proactive the information flow is between organizations and citizens, that is, the more and better dialogue there is in this bilateral environment, the more transparency there will be and, hence, there will be a better democracy. To progress in this, one of the most pressing needs, which appears as one of the main themes on the public agenda, is preventing corruption, being this relationship between governors and citizens one of the best mechanisms for its prevention.

In the Corruption Perception Index, created annually by the Transparency International organization (2016), Spain is in place 41, behind (number 1 corresponds to the least corrupted country, Denmark) other European countries such as France (23), Portugal and Poland (29) or Lithuania (38) and before Italy (60). In the case of Chile, the country has the place 24, being the second one of Latin America with less perception of corruption, only surpassed by Uruguay (21) or very in front of Brazil (79), Argentina (95), Perú (101), Bolivia (113), Ecuador (120), Paraguay (123) or Venezuela (166).

Regarding the reading of these results and even thought the correlation between presence of corruption and its perception is usually positive, we need to put a nuance to data: the fact that today there are more audits noticeable increases the generalized vision of the presence of corruption, which

doesn't mean that it didn't exist in the past with the same or even more intensity (López-López and Medranda Morales, 2016).

## 1.2. Access to public information and televisions

The access to public information is the most essential and clear operative concretion of transparency and it materializes through some mechanisms for its complete development, understanding it as “the information a public body or institution has, despite of format, the date when it was created, its authors or whether it is classified or not” (Solimano, Tanzi and Del Solar, 2008). Specifically, the citizen has access to a series of data, more or less articulated, in power of public or private organizations receiving money from the State with the prerogative to apply the authority principle. Public televisions, among mass media, fulfil the criteria mentioned before, besides a third one, promoting the public service through journalism (information is a right inherent to individuals, as per article 19 of UN Fundamental Charter).

Access to public information is comprised within the so called right of access to information, which purpose is a better decision making process by citizens. Its systematization and legal shielding entails three consequences: the strengthening of participative democracy and horizontal distribution of power; accountability (called that way politologically speaking); and the promotion of open government and transparency (López-López, Ulloa Erazo and Márquez Domínguez, 2016). Therefore, public service mass media have contributed to socialize a series of values such as freedom of expression and pluralism, an important issue of the doctrine in the European radio-television experience and its contribution to participation, development and cohesion in the public sphere (Murciano, 2006). So, more than seventy years of pluralism experience in European public services have reinforced the idea of having organizations of public communication which offer diversified contents with a varied information (Blumler, 1992) and that it is manifested and explicit in the tools televisions have available.

UNESCO (2012) mentions some elements that should characterize public service mass media: their independency (editorial and financial); management autonomy; pluralism, diversity and impartiality of the production of information; the claim of explicit and monitorable public service; or accountability before citizens and regulating entities (Campos Freire and Valencia-Bermúdez, 2016).

The severe economic crisis the world has lived has put a lot of organizations at risk, among them, the televisions and their corporations, not only due to the depreciation of their tangible products, but also due to the deterioration of their non-tangible values, such as reputability, credibility and prestige. This leads to a generalized perception of public money mismanagement due to the same difficulties of entities to define their funding and management model, as well as mechanisms to measure results and social profitability (Arnanz, 2002). This entails three needs: first, to stablish a reconfiguration of governance of the radio-television entities to preserve them in their public ownership before the progress of privatizations (Miguel and Casado, 2012); secondly, make the most of internal re-configuration to eliminate potential resistances before a media convergence scenario; and finally, winning legitimacy before an audience that demands good contents, but also good and efficient management, the later by setting a clear and explicit expense ceiling.

The new technologies of information and knowledge, through the websites and social networks, offer a unique opportunity so that public televisions, in the same way as the remaining organizations, recover their credibility and convey their expressed will of public service. Transparency and information in the exercise of institutional responsibilities must be promoted through the different tools available. Therefore, public institutions, or those receiving public funds, need to set up mechanisms for access to information and participation (second phase) through a liberal perspective (individual pluralism), that is, through an institution-individual relationship; or in corporate institution-collective bilateral environments (Hallin and Mancini, 2008), also called polarized pluralism, which sum up interests through information access but also through its processing, interpretation and broadcast in the form of public policies proposals.

### **1.3. Accountability or expansive accountability: corporations of televisions in Spain and Chile**

Transparency is sustained, overall, by a sum of values, as the access to public information, participation or through other mechanisms mentioned in regulations of different range. In Spain, especially in the Law 19/2013 of Transparency, Access to Public Information and Good Governance, besides other autonomic alternatives; in the case of Chile, the Law of Transparency of Public Affairs and Access to Information of the Administration of the State, dated 2008.

Sustainability of transparency and its regulations is directly related with relevance and understanding of information (Fung, Graham and Weil, 2003). Therefore, transparency is still understood as an accountability tool where there is dilemma when it comes to grant autonomy for organizations management, together with the risk that said autonomy dulls information belonging to everybody (O'Donnell, 2004), and where there might not be any hint of control or feedback by citizens (Cortés Arbeláez, 2014). Due to this issue, democracies have installed the concept of accountability, understood as the permanent and constant supervision of public management, which operates through different tools and strategies. "Its development has changed in the different countries depending on the regulation in effect, the will to enforce it, tools available for administration to enforce it and its systematization" (López López and Medranda Morales, 2016).

In Spain, there is a recent regulation developed in the article 105.b about access to archives and administrative registries, as well as article 37 of the Law 30/92 dated November 26, of the Judicial Regime of Public Administrations and the Common Administrative Procedure, which states the right of access to public information. It is the so-called Law 19/2013, which at the same time modifies the Law 5/2006, dated April 10, about regulation of conflict of interests of Government members and positions of responsibility of the General Administration of the State; Law 47/2003, dated November 26, General Budget; Law 6/1997, dated April 14, of Organization and Functioning of General Administration of the State; and the Law 10/2010, dated April 28, of prevention of money laundering and funding of terrorism. The purpose of said regulations is, mainly, obliging administrations to promote active advertisement that concretes into constant gathering, advertising and updating of the total of relevant information and of interest they have, stating and recognizing, at the same time, the right of citizens to receive said information.

The Law 19/2013, known as the Law of Transparency, is structured into three sections: First, about transparency of the public activity, where the field of application is made explicit, active advertisement and transparency of public activity; the second one, a good government, where sanctions are implemented if the Organic Law 2/2012, dated April 27, about Budget Stability and Financial Sustainability is breached; and third, about the Transparency and Good Governance Board, as body in charge to do a follow-up of the fulfilment of the Law. Therefore, everything regarding institutional and organizational information of budget and economic relevance focused in all fields of power is centred and made available for citizens through a unified portal, called the Transparency Portal, which depends on the Ministry of Presidency (Mendo Carmona and Iduarte Cofré, 2015).

Under these parameters, RTVE corporation is considered within the field of application because it is a Mercantile Society which funding from the State is more than 50%. Likewise, the corporation is affected by the Law 17/2006, dated June 5, of Radio and Television of State Ownership, the Law 8/2009, dated August 28, Funding of RTVE Corporation, or the Law 7/2010, dated March 31, General of Audiovisual Communication.

Regarding Chile, at the end of XX century, the country had very scarce regulations available in the field of rights of access to public information, among which outstands the Constitutional Organic Law of General Foundations of the State no. 18.575. It won't be until 2005 when this right will be established from the constitutional perspective with the reform of the Political Constitution (Sousa Oliva, 2010). Afterwards, the Law N° 20.285 about access to public information would be approved, with an expansive character (in it, all the administrative structure and companies where the State has more than 50% of actions, besides public companies created by law, such as Televisión Nacional de Chile), non-reserved (regulation of a huge number of themes), updated (at least once a month), with control (though a Board) and that would be established as the backbone in the Chilean juridical system by stablishing the principles of transparency in public function as imperative.

Another subsequent regulation in this field would be D.S. N° 20/2009, about by-laws of the Board of Transparency; D.S. N° 13/2009, about regulations for Transparency Law of Public Affairs and access to State Administration; Law N° 19.628, about protection of private life or Law N° 20.575, which stablishes the principle of purpose in the management of personal data. Televisión Nacional de Chile is also submitted to another series of precepts related to the organizational structure (Law N°19.132), of company management (Law N° 18.838) or production of information and practice of journalism (Law 19.733).

In general, transparency laws, access to public information and participation of Chile and Spain have several common characteristics: firstly, the evolution of both countries from a dictatorship towards a democratic and representative system, besides the context where the law is created, right after a time where corruption cases shake the political system and the executive power confirms the need to promote laws that help gain legitimacy before disenchanting citizens. Secondly, its moderately inclusive nature (impacts a considerable number of institutions) and non-reserved (even less in those themes affecting public safety).

## 2. Methods

The initial hypothesis is that transparency of Radio Televisión Española and Televisión Nacional de Chile, materialized through its respective Internet sites ([www.rtve.es](http://www.rtve.es) and [www.tvn.cl](http://www.tvn.cl)), is inferior to what is ethically demanded.

Under this hypothesis, the main research objective is to examine the level of transparency and participation of said television operators, besides (secondary objectives) elaborating an analysis proposal, concreting into a series of indicators, that allow auditing information of public radio-television corporations in general and stablishing conclusions that can orientate responsables of the diffusion of public information to improve their communicative practices.

### 2.1. Procedure and methodological strategy

This research is based in the analytical method, which is developed by using a qualitative methodology, materialized in the application of indicators (tools) to the websites of State public televisions of Spain and Chile. These were the stages of research:

- Development of a basic proposal of indicators to analyse public television depending on institutional, economic and production of information available.
- Application of these indicators to the websites of TVE corporations (Televisión Española) and TVN (Televisión Nacional de Chile).
- Exposition of results into three comparative tables (one by group) between TVE and TVN.
- Elaborate indications to improve accountability in public televisions.
- Lastly, to score with a numeric value, in a 0 to 100 scale, the transparency of every television operator studied, being 0 no transparency and 100 the maximum transparency possible. A value of 3,448 is assigned to every indicator complied with, half of it (1,724) to those partially complied with and 0 to those that were not fulfilled at all.

### 2.2. Population and sample

Television of Spain and Chile are analysed and compared essentially due to six reasons: 1. Its political evolution – analog- in the last decades; 2. The promotion of transparency laws after processes that altered institutional stability; 3. Its location in the middle-to-high range of Index of Corruption Perception of International Transparency; 4. Its position near to the Human Development Index (very high); 5. Access to Internet for population and digital gap, a 70% in Chile (National Survey of Access and Uses of Internet, 2015) and 79% in Spain (National Institute of Statistics, 2015); 6: The interest in comparing different geographic realities (Latin America and Europe).

The evolution of information and knowledge technologies turn websites (therefore we have chosen this route for the study) into an easy and accessible tool so that citizens have available, in a systematic manner, the information needed to elaborate a weighted criterion of the economic,

financial and business management of these corporations. In summary, to get to know, gain awareness and recognize their accountability strategy.

### **2.3. Tools for collecting information**

For this research, we have designed a tool of qualitative nature considering different evaluation strategies of media systems and of public institutions or with participation of public money. Therefore, we have reviewed the recommendations of the European Broadcasting Union (2014) and UNESCO (2012) for media development and quality of public broadcasters; of the European Commission about indicators of public and industrial services; and parameters developed by the Lab of Journalism and Communication for Plural Citizenship from Universitat Autònoma de Barcelona, applied to the Infoparticipa map, about access to public information. Moreover, it includes different State laws regarding the object of study, mentioned before, recommendations of International Transparency, the Compared Media Systems project (Hallin and Mancini, 2008) and authors Campos Freire and Valencia-Bermúdez (2016). We established 29 indicators for evaluation, a selection made in an autonomous manner, with a regulated procedure and with a strict scientific rigor.

The methodology used for this research is justified based on two reasons. First, the development of this tool of experimental nature and the lack of use of other existing tools comes out of the need to integrate different parameters so that accountability can be directly linked to participation and there is no breakup of sequenciality between both concepts (for participation to exist, there should be a significant level of accountability), something other models do not consider. Secondly, this methodology enables data collection and obtaining results that can be equally compared and measured; which at the same time, feeds research in this field and helps to improve suggested indicators, fine-tuning research questions for future publications.

These indicators are divided into three sets: institutional information, economic field and production of information.

Institutional information (11 indicators):

1. Is there a section informing about the history of the chain? That is: the historic context through a relationship of events chronologically ordered of the television or the corporation itself.
2. Is there information about regulations applicable to the entity? Participation laws, access to public information, regulation, laws or similar affecting it.
3. Is there information about the method to assign member of the Administration Board or similar body, its composition and retribution? Basic information about the maximum management body of the company: it must be clearly mentioned who chose it, through what proceeding, what kind of elections are there, who are its members, how much do they earn (if applicable) and for what concept.
4. Is there information about the maximum responsible of the entity? Name and surnames, election method, photography, curriculum. Clear identification of the maximum responsible from the entity.



5. Is there an institutional agenda established for the maximum responsible? Publication of actions of the person in charge of promotion the ordinary activity of the organization.
6. Is there basic information about the organigram and are functions clearly defined? Representation (graphic preferably) of the organizational structure, where departments and individuals managing them are included. Hierarchical relationships and competences must be clear.
7. Is there a relationship of job positions with retributions by category? Analyse whether a RPT is published (employment list), establishing existing categories and the retribution for each one of them. It is advisable there are the names and surnames of employees and indispensable for individuals in higher job positions.
8. Is there information about labour conditions or the applicable labour contract? Socio-labour situation of the company, publication of agreement in effect, specifying what employees are affected.
9. Is there a clearly defined and accessible directory? Phone numbers and emails of the main departments and responsables of public information.
10. Is an accountability report published? Written and accessible document where actions, policies executed, budget elements, objectives and achievements of the entity are made explicit.
11. Is there a clearly defined section named “Transparency”? Gather all information susceptible of being of interest for citizens through a menu that makes sections recognizable and orders data in a logical manner.

#### Economic field (7 indicators)

12. Is there information about the amount assigned to the entity regarding State budgets? Details about the money received as corporation and/ or television from the State in the current year. If there are extended budgets, it should be indicated. Likewise, the budget record must be made explicit.
13. Is there information about subsidies and any other contributions granted to the corporation? Information (amount, entity and concept) about the money the entity receives other than State budget. The amount, allocating entity, justification and concept.
14. Are annual accounts published with their corresponding audit report? Detailed relationship of annual income and expenses accounts. If applicable, there must be differentiation of income and expenses of radio and television.
15. Is there a monthly report about budget allocation? A document including detailed information about actions in compliance with what is established in the budget, making explicit the fulfilment of actions destined to the use of assigned resources.
16. Is there information about the costs of outsourcing production? Cost, company, concept and percentage over the total production.
17. Is there a section about the contracting party profile? A place clearly defined in the web with information about administrative contracting (notices, allocations, submissions).
18. Is there a list of companies who are contract beneficiaries? Making explicit the amount, concept, name of company, headquarters and the individual or individuals responsible. Likewise, it is advisable to attach a record of allocations for that company or individual responsible.

Production of information and access to contents (11 indicators)

19. Is there basic information about the Editorial Committee or similar body regarding contents? Definition of functions, name, photography, email and remuneration of the maximum responsible. Making its composition explicit.
20. Is the editorial line of the media explicit as well as the presence of a clear and accessible code of ethics? Clearly indicate what is the orientation of the mass media and make explicit the ethical and behavioural guidelines of directives and employees of the entity.
21. Is there a data protection policy? Compliance with the laws of protection data and other precepts in the field of production of information, so to guarantee and protect the rights of individuals in the fields of honour, image or intimacy.
22. Are there effective channels of participation/ consultation for the public? Virtual windows enabling participation in the production process and perform the right of communication.
23. Is there a specific space for the figure of the viewer ombudsman or alike? Identification of the individual (name, surnames, picture and contact information) responsible for attending complaints and suggestions of the public regarding ethics, right of access and production of contents.
24. Can the right of access to public information be enforced? Have a special section available for individuals or organizations to enforce the right of access to public information and provide the contact information of individual responsible.
25. Is there a historical record of contents? A section to access past contents of the chain.
26. Are there codes of self-regulation about contents and childhood? A document where there are guidelines regarding contents to protect childhood.
27. Are there codes regarding handling information about vulnerable collectives? Documents guiding the production of information when the protagonists are children, women, elderly, immigrants, individuals with any kind of disability, etc.
28. Are mechanisms to evaluate programmes and contents provided? That citizens can evaluate the quality of programmes broadcasted.
29. Are there any operative social networks?

### 3. Results

As mentioned before, initially the results from the first set of indicators are analysed, which are related to institutional information of the two televisions studied.

On the website of RTVE there is no section about its history told in a chronological manner; there is only mention to the fact there have been 60 years since its creation. There is information about the composition of the Administration Board with the name, surname and picture of members, but the information is clearly insufficient: there is no data available about functions, beyond a generic “being responsible for the compliance of established objectives”, and neither the election method or retributions, if any. Regarding the maximum responsible of the entity, his salary is published (154.209,97 €), although in the concept there is no specification about specific tasks and

responsibilities, because there is no official agenda informing about activities performed, making monitoring difficult.

**Table 1. Indicators of transparency about institutional information [1]**

Indicator	RTVE	TVN
Is there a section informing about the history of the chain?	X	√
Is there information about regulations applicable to the entity?	√	√
Is there information about the method to assign member of the Administration Board or similar body, its composition and retribution?	P	P
Is there information about the maximum responsible of the entity?	P	√
Is there an institutional agenda established for the maximum responsible	X	X
Is there basic information about the organigram and are functions clearly defined?	√	P
Is there a relationship of job positions with retributions by category?	X	√
Is there information about labour conditions or the applicable labour contract?	√	X
Is there a clearly defined and accessible directory?	P	X

Source: Authors' own creation

The web shows in a document, the organizational structure through a graphic representation, perfectly marking out the hierarchy in radio, television and corporation, besides demarcating competences. It would be interesting that this information could be more accessible through an interactive link, if it is counting on the total validation of the indicator. Regarding the employment list (RPT), there is only a vague mention to the fact that the RTVE corporation had, at the end of 2013, a payroll of 6.325 employees. Therefore, besides information is not updated, it is clearly insufficient. Regarding the regulations of labour conditions, it is specified (with an external link to BOE; the accessibility should be improved) that the collective labour agreement of the Corporation is a text regulating labour relationships between RTVE Corporation and its employees. The II agreement was signed in 2013 with a validity until December 2015, which is understood as still in effect due to the extension clause, although there is no updated information available so far.

Likewise, there is a directory, but it is scarce and moreover, it does not include all contact information on the web (such as territorial delegations); and therefore, we decided to score the indicator as partially compliant. On the other hand, there is no accessible, clear and written accountability report. There are two sections that mention the ordinary activities of the entity, like the attendances in the Mixed Commission of Parliament Monitoring of RTVE (the last one is dated September 2015) and the “minutes of public service”, the last one dated 2013; both are clearly insufficient. Finally, there is a section called “Transparency”, which gathers and provides access to most indicators defined in this research and which facilitates visualization about institutional, economic or juridical information.

The website of Televisión Nacional de Chile offers detailed information, both from the organizational perspective as well as the evolution of its own infrastructures, the history of the organization. In the legal area, it also mentions the complete law framework applicable, so it would fulfil that indicator, but it would be necessary to highlight the specific aspects about each law affecting the institution though. Regarding information about Executive Management, the current job positions are made explicit, with their names and surnames, curriculum and retribution received per years. In general, data are complete and detailed, however this indicator has not been validated because there is no mention to the method of election of said positions. Likewise, the main responsible of the entity is identified and monitoring can be done, even not completely, because there is no agenda detailing his responsibilities.

Regarding the organigram, its validation is partial, because the most relevant departments are mentioned, but the information is still incomplete. At the same time, since there is no currently a RPT, the information has been validated because there is mention to the current number of employees per area, types of contract, workplace and distribution by gender, informing about retributions, even the data from previous years. On the other hand, there is no document that makes explicit social-labour rights nor regulations affecting employees, and there is no contact directory either, beyond the addresses of headquarters or branches. Finally, there is a section of “Transparency” allowing access to a certain kind of information, even though in it there is nothing like an accountability report, not even an annual report, and it resembles more an advertisement magazine than an activity report.

In general, transparency indicators about institutional information describe three main coincidences in both televisions: firstly, insufficiency of data offered regarding the maximum body of entity management and its main representative; secondly, the infra-usage of the website to evidence labour relationships of the entity’s employees and finally, the lack of update in accountability, which is not attributable to the political casuistry.

**Table 2. Indicators of transparency about economic information**

Indicator	RTVE	TVN
Is there information about the amount assigned to the entity regarding State budgets?	√	√
Is there information about subsidies and any other contributions granted to the corporation?	√	√
Are annual accounts published with their corresponding audit report?	√	√
Is there a monthly report about budget allocation?	X	P
Is there information about the costs of outsourcing production?	X	X
Is there a section about the contracting party profile?	√	X
Is there a list of companies who are contract beneficiaries?	P	X

Source: Authors’ own creation

In the case of economic information, it is worth mentioning that formally, the requirement of publishing practically the totality of data about selected transparency indicators is met, but a different issue is the higher or lesser easiness to access them. RTVE published information regarding its accounts essentially in two epigraphs of “Economic and Statistical Information” available in the transparency section in its web “accounts” and “budgets”. The first one offers a detailed analysis of the accounts of the Entity period after period of exercise, together with a management report. In the second one there is accurate information about public contributions (subsidies) RTVE receives from the General Budget of the State, both for its ordinary functioning as well as for specific activities: funding of the Choir and Orchestra of the corporation and the educational programme “La Aventura del Saber”.

Besides annual accounts, the management report and subsidies received, RTVE also publishes an annual audit of its different activities, performed by the Management of Internal Audit, besides an annual report of Liquidation of Budgets of Exploitation and Capital, elaborated by the Intervention of RTVE and which also has a legal nature of audit. In both cases, these are documents elaborated by RTVE itself. All this is complemented by a link to the General Government Financial Information Center of the Ministry of Finance and Public Affairs, whereas among other issues, there is diverse information regarding budget and funding of public entities linked to the General Administration of the State, like RTVE.

Televisión Nacional de Chile also offers detailed information about its budget. There outstands the fact that the audit of its accounts, which is different compared to RTVE, is not internal, but performed by an independent entity, specifically the International Consultants Deloitte Company.

Regarding public contributions (subsidies, General Budgets of the State) we mention in the previous table that TVN disseminates said information, but there should be a nuance to this statement, because TVN has obligation of self-funding by law, that is, it cannot receive public contributions for its funding. Therefore, what really happens in its accounts is that there is no income coming from the Chilean State reflected.

Regarding the monthly information of budget allocation, neither RTVE nor TVN fulfil this indicator, however, in the case of the Chilean channel we have determined that it does comply with it partially since, and differently compared to Televisión Española, which only informs annually about its accounts, TVN publishes quarterly reports of the ongoing year. Hence, the last information available on the web of RTVE corresponds to 2015, while in the Chilean case we already have the quarterly reports of March, June and September 2016.

Regarding expenses of outsourcing production, neither TVE nor TVN specify these costs, they simply make some reference in their audits and economic reports to objectives regarding this issue and make explicit the concept of budget they are attributed to, but aggregated to others, therefore it is impossible to figure out the exact amount destined to outsourcing production.

Lastly, there is a difference between the public Spanish and Chilean television regarding the transparency of their policies for contracting assets or services. By applying the Spanish law, RTVE

has a specific section entitled “Contracting Party Profile” available on its website, where all contracting procedures of the entity are published, from tenders to allocation. About the latter, there is no list of winning companies, although in the information about every contract file, there appears the company winning every procedure, previous identification of who requests this information. Moreover, a link to the Platform of Contracts from the State is included. In the Chilean case, there is no contracting party profile or any direct information whatsoever, about its contracting procedures.

Based on the aforesaid, the most basic indicators in the economic field on both televisions are fulfilled in a correct manner, even though there is a serious deficit on information about budget allocation and outsourcing production, being the latter a cause of the scarce (TVE) or null (TVN) data regarding companies benefiting from products.

**Table 3. Indicators of transparency about production of information and access to contents**

Indicator	RTVE	TVN
Is there basic information about the Editorial Committee or similar body regarding contents?	P	X
Is the editorial line of the media explicit as well as the presence of a clear and accessible code of ethics?	P	√
Is there a data protection policy?	X	√
Are there effective channels of participation/ consultation for the public?	√	√
Is there a specific space for the figure of the viewer ombudsman or alike?	√	P
Can the right of access to public information be enforced?	√	X
Is there a historical record of contents?	√	√
Are there codes of self-regulation about contents and childhood?	√	√
Are there codes regarding handling information about vulnerable collectives?	√	√
Are mechanisms to evaluate programmes and contents provided?	X	√
Are there any operative social networks?	√	√

Source: Authors’ own creation

From the contents perspective, the RTVE website offers information about the Informative Board (comparable to an editorial committee), making explicit that it is an “internal body of participation of professionals of information of the RTVE corporation to watch over its independency and objectivity and veracity of informative contents disseminated by societies offering the corresponding public service”, but it is not indicated who their current members are nor the way to contact them. At most, within the TVE organigram available on the website, the names and functions of the members of the informative managements and their contents are identified, but here the composition of the Informative Board is not reflected either. TVN, on the other side, does not have an editorial board nor similar body in its web. Only by consulting the section “Structure”, there can be seen an organigram where there is the name of the Director of Programming and the rest of directives from the Department.

Regarding the editorial line, in the section dedicated to the Informative Board of RTVE, there is mentioned that “among its functions, the Law obliges informing about the editorial line and the informative programming”, but again there is no further information therein. There is a document we can consider a code of ethics, called Self-Regulation Code, which essentially regulates contents from the perspective of protection of childhood and it is complemented with other texts, entitled Basic Principles of Programming, Statute of Information, Style Manual or UN Global Compact, subscribed by RTVE. TVN does have in its web, a specific section specifying its editorial line, based on pluralism, the right of citizens towards information and creating a critical public opinion. Besides, there is also a document, Programmatic and Editorial Orientations, which as a code of ethics does, it entails different actions, among them the handling media must give regarding different collectives (childhood, women, elderly, disabled, ethnic minorities ...). Likewise, Chapter 5, “Sensitive Issues”, from the Style Manual of RTVE explains how information regarding vulnerable collectives must be handled, such as children and adolescents, elderly, victims of sexist violence, individuals with disability or addictive behaviour, immigrants, etc.

In the Spanish case, there outstands the section of the Office of the Viewer Ombudsman, through which different channels are made available to send complaints, suggestions or evaluate contents, besides they have their reports using other routes, in the program broadcasted monthly on channel 2 (second channel of Televisión Española) called “RTVE Responde” (RTVE Answers). However, beyond this channel and the possibility to share contents through social networks, there are no other direct forms of participation, evaluation of programmes and contents or the interaction with the public, such as the possibility to publish comments or respond to different queries, which is different to what happens with TVN, whereas contents can be commented. In the Chilean case, there is no such thing as the Viewer Ombudsman so far, but there is a space called “TVN responde” (TVN Answers), whereas viewers can send complaints or suggestions through a form the channel claims to respond to. Therefore, it is understood that the indicator is partly fulfilled.

From the positive perspective, it is eye-catching that in the website of RTVE, the right of access, which does not exist in the website of TVN, it is not considered solely in the transparency section of the portal, but one of the outstanding news on the home of rtve.es is precisely the opening of the period for presenting requests for the right of access. Moreover, the link to social network of the corporation (Facebook, Twitter and Google Plus) and the extensive archive of contents, including historical material of the Spanish Film Library, such as NO-DO [2], are available at the home section of the website of RTVE; the same happens with profiles in Facebook, Twitter, Instagram and YouTube of TVN with its broadcasting archive.

Finally, it is worth mentioning that for Televisión Española the presence of a data protection policy is marked as negative, because beyond the general Spanish law in the matter, which obviously must be complied with, there is no mention in the web about this issue. The contrary occurs with the Chilean television, which does have a specific section in its web destined thereto, “TVN y sus políticas de privacidad” (TVN and its privacy policies).

Transparency in the production of information and access to contents is acceptable in both chains, needing to improve in the case of the Spanish television, the direct participation of citizens through

simple evaluation mechanisms. And in the case of the Chilean television, it would need to work on the offer of basic information about the body responsible for establishing the strategic lines in the field of contents.

#### 4. Discussion and conclusions

From the 29 indicators proposed for the evaluation of the level of transparency of public television operators, only three, 10.3%, are not met in any of the two cases analysed: publication of the institutional agenda of the maximum responsible of the entity, elaboration of an accountability report and detail of expenses of outsourcing production. Therefore, the first conclusion we can present is the important level of transparency of Radio Televisión Española and Televisión Nacional de Chile, which both together fulfil 71% of proposed indicators.

Based on the scale of transparency (from 0 to 100) explained in the Methods section, Radio Televisión Española, with 15 fully accomplished indicators, 6 partially fulfilled and 8 not complied with, receives a score of 62,069 points. On the other side, Televisión Nacional de Chile fulfils 16 indicators, partially complies with 4 and ignores 9, therefore, its transparency score is also 62,069. Therefore, we conclude that both operators show the same level of transparency from the formal perspective, even though there is a nuance to this in two aspects: the legal obligations are not the same in the Spanish and the Chilean case, and several indicators of a greater relevance (budget allocation, employment list and participation of citizens in contents) are indeed met by TVN.

The second conclusion, is that the website of Radio Televisión Española offers completer and more abundant contents than Televisión Nacional de Chile, but the website of the latter is much more clear and understandable than the Spanish operator, which can be complex for direct and fast access to the specific information a citizen may look for. An example of this in the Spanish case is the fact that, even to access the transparency section, there is the need to scroll down several screens at the home page until the menu located below, there is an access to “Corporación RTVE” and within the new page, “Transparency”.

By observing each one of the three sets of analysis suggested, both televisions get the lowest score in the section of institutional transparency, with TVN (54,54 points) placed before RTVE (49,99) and the best score, regarding transparency of data related to production of information and access to contents, aspect where TVN (77,26) surpasses RTVE as well (72,72).

Regarding transparency of economic data, despite that RTVE uses internal audits and TVN is audited by Deloitte, the Spanish operator (71,43 points) clearly surpasses the Chilean (57,15), mainly since RTVE, complying with the country’s laws, offers detailed information of its contracting processes with outsourcing companies, an aspect where TVN is absolutely duller.

For the discussion, it is worth mentioning that this research has demonstrated the validity of suggested indicators when it comes to score, at least initially, the level of transparency of different television operators and to stablish equitable and objective comparisons between them – which represents an expressed justification of this research and the relevance of results- but it is insufficient



if the goal is to progress towards the so-called hyper-transparency. In this sense, besides institutional, economic information and the production of information, it is also necessary to include governance and the relationship with interest groups, as well as to delve deeper into the labour conditions and institutionalized participation by the audience so to audit entities in a holistic manner. Therefore, a more detailed study is recommended so to broaden the number of indicators for future researches.

**\*Funded research.** The results of this research are part of the studies carried out in the context of two research projects: “XESCOM, International Research Network on Communication Management” (ED341D R2016/019), funded in regime of competitive concurrence by Consellería de Cultura, Educación e Ordenación Universitaria of Xunta de Galicia and the R+D project called “Indicators of Governance, Funding, Accountability, Innovation, Quality and Public Service of European RTV Applicable to Spain in the Digital Context” (CSO2015-66543-P), funded in the framework of the State Programme for Promotion of Scientific and Technical Research of Excellence., State Sub programme of Creation of Knowledge from the Ministry of Economy and Competitiveness of the Spanish Government; both coordinated by the Group Novos Medios from Universidad de Santiago de Compostela, together with the participation of CP2 and TI3 groups of Universidad de Vigo and iMARKA of Universidad de A Coruña in the case of XESCOM.

## 5. Notes

[1] √ = fully fulfilled indicator, P = partially fulfilled indicator, X = indicator not fulfilled.

[2] Acronyms of News and Documentaries Programme, political propaganda that, with the aspect of news Programme, it was mandatorily broadcasted during the years of Francoist dictatorship in all Spanish cinemas before projecting a movie.

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### How to cite this article in bibliographies / References

P C López-López, I Puentes-Rivera, J Rúas-Araújo (2017): “Transparency in public televisions: development of indicators and case analysis in Spain and Chile”. *Revista Latina de Comunicación Social*, 72, pp. 253 to 272.

<http://www.revistalatinacs.org/072paper/1164/14en.html>

DOI: [10.4185/RLCS-2017-1164](https://doi.org/10.4185/RLCS-2017-1164)

Article received on 12 January 2017. Accepted on 24 February.  
Published on 2 March 2017.