Media Governance and Media Quality Management: Theoretical Concepts and an Empirical Example from Switzerland

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Introduction

By exploring and comparing media systems in Europe in terms of their capabilities to provide independent and pluralistic media, freedom is conventionally defined as the absence of state intervention. But by asking the question of how the different media systems in Europe vary regarding freedom, pluralism and participation, we also have to ask whether media policy and media regulation incite the media to fulfil their societal functions, such as to contribute to the observation and synchronization of society. For this societal role, media's independence and freedom are crucial preconditions. On the other hand – especially under the terms of commercialization (see Meier and Jarren 2001) – it can also be seen that the media normally act according to their own imperatives and rules, and these rules are not necessarily those which foster the normatively assigned societal role. That is why political systems – governments – are implementing regulatory frameworks. In the media sector regulation is required, for example, when it comes to opening markets, when media are abusing their power, or when regulation is required in order to attain specific quality goals such as diversity or the protection of minors and so on.

From this point of view, media regulation does not necessarily mean a limitation of freedom by the state, but a strengthening and support of freedom and pluralism. Based on that perspective, we discuss in this article the potential of co-regulation as a modern form of regulation. As McGonagle (2002: 2) writes, trends such as media convergence and internationalization of the media require new forms of regulation. In the search for these new, more consistent and adequate forms of regulation, the notions of self- and co-regulation instead of traditional state-dominated regulatory systems have been introduced to the debate. These new forms of

regulation usually occur first in the environment of new technologies – the online world – while regulation concerning traditional media tends to stick with more traditional forms of regulation. The Report of the US President's Working Group on Unlawful Conduct on the Internet stresses the role of the private sector as a crucial actor to protect children online, to support self-regulatory consumer protection initiatives as well as to coordinate and cooperate with law enforcement authorities (WGIG 2005).

The White Paper on European Governance, published by the European Commission, mentions the term co-regulation as an example of better regulation that 'combines binding legislative and regulatory action with measures taken by the actors most concerned' (European Commission 2001: 21). In a co-regulatory system, the public authorities accept that the protection of societal values can be left to self-regulatory mechanisms and codes of conduct. This is exactly the basic assumption of the new concept of 'Media Governance', which implicates the intermediation of the steering and control effort by state regulation authority and the principle of media autonomy. A central requirement of 'Media Governance' is the implementation of a quality management system that systematically treats the interests of the stakeholders and functions as an instrument to establish a culture of responsibility, or media accountability.

In this article we give a quick overview, with reference to the corresponding literature, of the main requirements of 'Media Governance'. In a second step, we describe the main principles of a quality management system for media organizations. In Switzerland the media regulation and supervisory authority – the Federal Office of Communication (OFCOM) – has applied the co-regulation concept by linking the guaranteeing of broadcasting licenses to the implementation of quality management systems within the media organization. We discuss in this context the results of a study commissioned by OFCOM that shows the state of quality control practices among Swiss private broadcasting organizations and the conclusions drawn by OFCOM for the broadcasting licensing and regulation process. Subsequently, we present some empirical evidence concerning the first effects of this new co-regulation process in Switzerland and draw some conclusions with regard to the potential of the 'Media Governance' concept. Finally, we offer an outlook on future research needs in this field on an international level.

From media policy to Media Governance

There are many rather different concepts of regulation implemented internationally. Some fields of regulation are completely handed over to industry self-regulation, while others remain subject to traditional government regulation. In the media sector, the regulatory opportunities of the state are generally limited, because state regulation in that field conflicts with the principle of freedom of the media and might be seen as inappropriate censorship. In the current theoretical discussion about the right concept, new models – such as 'regulated self-regulation' – are seen as the 'third path' in media policy (see Puppis 2007). In these new concepts the role of the state moves away from hierarchical control to a modulation of processes going on within society (see Schulz and Held 2001). In the scientific discussion about effective media policy and an adequate regulation system, this third path is outlined under a new buzzword: 'Media Governance' (see Donges 2007). This concept is likely to become a promising model for co-regulation in the media sector. McQuail (2003: 91) defines this modern form of regulation as follows: 'Media Governance covers all means by which the mass media are limited, directed,

encouraged, managed or called into account, ranging from the most binding law to the most resistible of pressure and self-chosen disciplines.'

'Media Governance' is a plurivalent concept which includes the setting of rules, their implementation and the sanctioning as an outcome of private actors negotiating with the regulator and other societal stakeholders. Meier (2006: 203) distinguishes three different perspectives: governance for, governance within, and governance by the media. In this article we focus on the relation between the first and second perspective and understand 'Media Governance' according to Hamelink and Nordenstrang (2006: 7) as a 'framework of practices, rules and institutions that set limits and give incentives for the performance of the media'. Furthermore, we assess the potential of media regulation to actively encourage the media to enforce social and corporative objectives.

According to Jarren (2007) 'Media Governance' aims at the creation of a new social order within the special function of media in society. In spite of the guaranteed autonomy of the media, other civic actors have the opportunity to participate in the policy-making process. Thus, on the one hand, media policy restricts the influence of the state on media structure, but on the other hand, media policy secures the orientation of the media towards the needs of society. In other words, 'Media Governance' has to assure the autonomy of the media but at the same time take care that the media organizations assume responsibility within this autonomy. That means that media organizations and professional groups are obliged to establish a dialogue, negotiation processes and forms of self-obligation like codes of conduct, mission statements or ethical codes. In order to do this, the following should act as the guiding principles (see Jarren 2007: 141–2):

1. Freedom of communication and professional independence: On the level of the single media organization this could mean separation of the commercial administration and the editorial board but also the implementation of professional rules of autonomy as they are written down in the guidelines of press councils.
2. Responsiveness of the media organization relating to all (not only political) stakeholders: For example on the organizational level, this could mean the involvement of different civic interest groups in the media observatory, or, on the level of media coverage, pluralism by selecting a variety of themes and differing opinions.
3. Equal Access to the media for all interest groups.
4. Media Accountability: Media organizations are obliged to observe the rules that are stipulated by organized interests within the society.

This social order as a culture of responsibility has to be constituted in a social process. In this process of co-regulation, new organizations or initiatives can arise within the media system or within the single media organization. Social actors who contribute to this process of self-control within the media system are, for example, press councils, journalism schools or other institutions of professional education. Media observatories or media awards could be part of this system. Within the media organization, responsibility can be located on different levels: the media organization as a whole, the ownership, the management and the individual journalist. Within the media organization, ethics committees or quality committees communicate both within the organization and between the organization and society. They correspond with new forms of

self-obligation and self-control. The involvement of citizens or special representatives of interest groups can provide a way to organize social responsibility in the media parallel to the influence of the market and the state.

Most of the existing co-regulation has been established to protect minors or to regulate advertising. Both objectives are suitable for co-regulatory measures. However, other fields would also be suitable; for instance, some co-regulatory systems for the implementation of ethics or quality management systems in broadcasting or in the press.

The implementation of quality management systems as precondition
Quality management required
'Media Governance' in the sense of co-regulation is not independent from a priori defined political or cultural rules and agreements, nor is it only an ex post instrument. Rather, co-regulation can be an instrument of quality assurance during the production process within the media organizations. Only if the rules of external regulation are linked with self-regulation can media policy then be an effective instrument of quality assurance within media organizations (see Gottwald et al. 2006). Therefore, the implementation of a comprehensive quality management system within media organizations is an important precondition for 'Media Governance' and can be an outcome of co-regulation. A quality management system, which includes the establishment of visible and transparent schedules of responsibilities on the level of the media organization and the newsrooms, is part of this culture. This also includes the constitution and communication of transparency rules, quality norms, principles and standards as well as procedures involving the civic society or recipients (see Jarren 2007: 142). A quality management system that treats the interests of the stakeholders systematically can be seen as an instrument to establish a culture of responsibility or media accountability. On the organizational level, the culture of media responsibility can be encouraged by a Media Accountability System as proposed by Bertrand (2000).

Along with the idea of 'Media Governance', concepts of quality management are gaining in importance. In this process, quality goals must be stated by management in a way that they can be measured in an evaluation process. Quality assurance itself is an ongoing process with preventive, accompanying, and ex post elements. The process of quality assurance is primarily established and driven by the management. It allows for persistent evaluation in the sense of self-control to see whether the organization's performance (for example its programme) meets the goals and standards set by themselves in accordance with the broader regulatory framework. On the editorial level, maintaining quality includes all the systematically planned procedures which contribute to determining journalistic production processes or services, or improving and adjusting them to previously defined requirements – quality goals. Quality assurance thereby helps to define corrective measures to meet the set standards and to overcome deficits. To develop, steer and ensure quality in media companies, suitable management concepts which develop the corresponding structures and create internal guidelines are necessary.

Concepts of media quality management
Quality management concepts exist in various forms: one example is the self-evaluation model of the European Foundation for Quality Management (EFQM 2008) which meets the requirements of the Total Quality Management (TQM) philosophy and was considered as the framework for the continuous improvement of organizational quality management (see Wyss

2002). The TQM approach defines quality as the goal of a comprehensive management strategy in which all of the individual strategies of the editor in chief are aimed at raising quality by developing quality criteria, putting them into practice and maintaining them. In particular, the three main goals – comprehensiveness, regularized procedures and performance assessment – mark the TQM approach as a particularly ambitious one (see Meckel 1999: 43–4). The goal of TQM is not just about meeting standards; the quality management process associated with it is continuous. This presupposes that a media company regularly acquires information about its environment, its competitors and customers, and adjusts to the requirements of the relevant stakeholders. Finally, quality management requires a control procedure. An improvement can only be recognized as such if concrete quality goals are formulated at the outset, against which the currently achieved quality standard can be measured.

Up to now, there is no media company noted for the application of the EFQM model. But since 2003 two International Standards exist: ISAS BC 9001:2003 for broadcasters and ISAS P 9001:2005 for the press and Internet content providers (see Certimedia 2008). These standards were developed by the Media and Society Foundation – a Swiss-based initiative of prominent international media professionals – which gathered the main principles universally shared by media organizations regarding quality management (see Media Society Foundation 2008). The foundation justifies this initiative as follows:

> Commercial and political pressures are threatening media's credibility and weakening its influence on society. Media transparency and accountability are needed to establish a trusting relationship between the media and its readers, listeners or viewers, but also its numerous other stakeholders, i.e. its own staff, the advertisers, the public at large, the civil society, public authorities, etc. The time has come for the media to claim its commitment to its own professional and ethical standards and demonstrate that it is enforcing the values it is upholding. (Media Society Foundation 2008)

All requirements of International ISAS Standards are specific to media companies and intended to be applied by all organizations and their suppliers, regardless of type (television and radio broadcasters, Internet content providers), status (private, public service or community broadcasters) and size. To date, only three companies worldwide comply with the requirements of the ISAS Standard (see Certimedia 2008): Trans TV (Indonesia's leading commercial television channel), Canal Once (Mexico's public cultural channel), and Latvijas Radio (Latvia's national radio station). The ISAS Standards are based on ISO 9001:2000. Research by Wyss (2002) and Hermes (2006) has shown that it makes little sense to use the ISO 9001:2000 Standard – which is widespread in other industries – for media organizations without adapting it to the peculiarities of the media industry.

Standards of media quality management
All the concepts of quality management have in common that an evaluation of the quality assurance practice has to focus on certain standards. If media organizations want to contribute to the process of quality assurance systematically, they have to communicate these standards. In addition, by implementing a quality management system the media organizations have to commit to a culture of responsibility as well as identify and pursue crucial quality-focused

processes. A quality management system thus includes at least (1) a transparent quality policy and (2) resources processes (see Wyss 2002):

(1) Quality policy
The management should provide evidence of its commitment to well-defined core values. The quality policy of the management should be formalized in the form of a widely disseminated document that is reviewed at least once a year. This document could, for example, include an editorial charter that guarantees the independence of the media organization from any kind of power, be it political, economical or other. A code for programmes or a mission statement, an ethical code or a quality manual includes, for example, professional norms of quality journalism, such as pluralism of opinions and points of view, the promotion of gender equality, consideration for minority groups, promotion of diversity and so on. A code of advertising allows for transparency as a crucial quality standard in journalism. The management should clearly describe the organization's relationship with such constituencies as owners/shareholders, political authorities and advertisers.

(2) Resources and processes
The management should identify and document all the processes having a direct impact on the quality of editorial content, the relationship with advertisers, the relationship with external suppliers of content, the measurement of audience figures and listeners/viewers' satisfaction, and the management of human resources. The organization should have clear rules of recruitment and professional development options for all its employees. Specifically, the organization should have training opportunities, transparent recruitment and lay-off procedures, and encourage employees to suggest quality improvements. The organization should pay particular attention to the measurement of audience figures, audience satisfaction, and stakeholders' complaints. The management should establish an in- or/and out-house critic, or a 'content evaluation commission' to scrutinize the newspaper, or monitor the programme. The management should put in place a quality or ethics committee and mediation mechanisms (for example ombudsman) to deal with external complaints. The management could establish a press council, for example regular meetings of professionals from the media and representative members of the community. All these are elements which contribute to a quality management system.

While there is an intensive discussion among media scientists on the functionality and adequacy of quality management systems, the ongoing debate has hardly affected the media organizations so far. Recent research on the establishment and implementation of forms of quality assurance paint a bleak picture: Research in the German-speaking countries show that such initiatives are very seldom or only rudimentarily implemented in media organisations. Hermes (2006: 238–40) found in a survey of German news organizations that they are still far from a comprehensive quality culture or a deliberate use of quality management approaches. With the exception of public broadcasters, only one third of all news organizations have defined quality goals in mission statements or editorial handbooks. Research by Siegrist (2006) and Wyss (2007) on the state of quality management in daily newspapers and among private broadcasters finds the same for Switzerland.

   According to Wyss (2002), the low level of quality management among media organizations can be explained by the fact that in media business the dominance of cost management

hinders the discussion about journalistic quality and its maintenance. The trend to increased commercialization of the media industry results in a process by which media organizations and editorial production processes are increasingly dictated by economic logic rather than journalistic principles. The more the media operate according to the logic of economy, efficiency and profit maximization, the less we can expect the implementation of a quality management system which systematically takes into consideration the interests of the stakeholders. Therefore, it remains doubtful if media organizations will make an effort on their own to establish quality management systems, if external media regulation – legal provisions – does not support this process. That is why Ladeur (2000) asks for a media policy and regulation which fosters forms of editorial quality management, and Jarren (2007: 134) raises the point that it always takes public debate and sometimes the threat of measures by political actors to institutionalize self-control.

The case of Switzerland

Problem analysis: The attempt of OFCOM

OFCOM recently made a first step in the direction of 'Media Governance'. This media regulation body handles questions related to telecommunications and broadcasting (radio and television). In this sphere, OFCOM fulfils all regulatory tasks concerning electronic media. In 2007, after the implementation of the new law on Radio and TV (nRTVG), the radio and TV licences in Switzerland were re-assigned. According to Article 38 and Article 43 nRTVG, the licensing of media organizations is dependent on the fulfilment of certain performance standards by these organizations. The constitutional mandate requires a broadcasting system which contributes to education and cultural development, free development of opinions as well as to entertainment. The implementation of this constitutional provision takes place on two levels: firstly, SRG SSR idée suisse as a public broadcaster is to provide for this service on a national and language-regional level. Secondly, private broadcasters are in a position to deliver these services on a local level.

Why did OFCOM decide to use media self-responsibility or co-regulation in the implementation of the nRTVG and to require self-regulation from private broadcasters? This decision has a history which shows how, in several steps, private actors, with a mandate of the state, have set their own rules and made sure they were implemented and sanctioned. It has become obvious that a lack of self-regulation is to be overcome by means of co-regulation.

OFCOM made a first important step when it formulated the programme mandate to prepare the implementation of the nRTVG. To do this, OFCOM commissioned and published two media science studies on the professional structures in private broadcasting and on quality assurance within these organizations. The Institute for Media Science and Media Research at Zurich University was mandated to realize a survey (online-survey of 44 radio stations and eighteen TV stations, or 449 individuals; see Bonfadelli and Marr 2007). The Institute for Applied Media Studies at Zurich's University of Applied Science (IAM) analysed, with observation, document analysis and interviews, the mechanisms and practice of quality assurance in eleven radio and television stations selected for this purpose (see Wyss 2007). The gathered data was to support OFCOM in implementing the nRTVG in an adequate manner according to the structural realities of the situation in Switzerland. The study was to result in suggestions on how Swiss private broadcasters could meet the imperatives of quality assurance. The practical goal of the

research project was to identify models for best practice strategies that should be considered when formulating the licensing requirements.

The need for such research was obvious, since earlier corresponding scientific studies on the state of quality management in media organizations showed that there was only indirect reference to society: forms of participation (for example press councils or ombudsmen) hardly existed, and quality management that integrated the interests of stakeholders was hardly implemented (see Wyss 2002). The research commissioned by OFCOM reinforced these impressions. Elements of quality assurance (for example programme planning, programme feedback, documents such as editorial guidelines or charters) exist in many organizations; however, a continuous and systematic quality assurance hardly ever takes place (see Bonfadelli and Marr 2007). 58 per cent of all production directors find programme feedback and quality assurance very important and another 30 per cent find it important. To what extent these merely remain lip service depends heavily on the role which quality assurance plays in editorial everyday life. In eight out of ten organizations, mission statements exist.

71 per cent of all stations have an editorial charter, and in six out of ten stations, a document defines ethical standards. Less than half of all stations have explicit guidelines on how to deal with PR activities.

Since paper doesn't blush, the existence of these documents says little about everyday practice. More telling are the findings of the second qualitative study on the practical implementation of quality assurance procedures which was carried out parallel to the interviews (see Wyss 2007). The results from that research are to result in suggestions how Swiss private broadcasters could meet the imperatives of quality assurance as well. The study showed that the volume of documents, such as mission statements or manuals, in the analysed media organizations is considerable; however, they differ greatly in content and form and have no common concept regarding journalistic quality. In the various stations there are very different ideas concerning the function of these guidelines. The documents provide only vague and approximate quality definitions. For example, the editorial concept of one station states:

> The relevance depends on the target group and the emotional involvement of the members of that group. There is no absolute or abstract relevance. There is no importance except for that of those of our listeners who belong to the majority of our target group (thus not children, not other journalists, not university graduates).

Another station makes a difference between a 'performance mission statement' and a 'financial mission statement', which fully aligns the programmes with 'today's and future needs of the market' and with 'profit'. There is hardly a specific positioning by the distinctive quality of goals among the stations.

In the research, the news organizations' resource problems became obvious. Absence due to training leads to a shortage in manpower. Stations depend heavily on the intrinsic motivation of the mostly very young employees. In Swiss private radio and TV stations every other person is 30 years old or younger. Only 16 per cent are older than 40. The average age is about 33. The relation between young journalists – often with only basic training – and trainees is 1:1 at some stations. Nearly 20 per cent of all interviewees have had no journalistic training at all. At these

private stations, training is something the employees have to seek themselves, rather than having the station provide it for them. Only half of the stations offer internal or external training.

The available resources such as time or expert knowledge are rather weak. Work pressure is generally high. With a monthly salary of CHF 5200, the median income in this media sector is not only well below the overall median income for journalists (CHF 7200), but is even below the median for all employees in Switzerland (CHF 5550).

Also concerning quality assurance processes, the qualitative and quantitative picture presents itself rather poorly: periodic programme feedback following emission takes place in seven out of ten cases. The editors are well aware of the importance of an approval process to avoid mistakes; however, such a process takes place only occasionally. Only in every other station is the systematic countercheck of PR information provided to the station on a regular basis. The stations analysed rarely evaluate listener and viewer feedback. The legally stipulated ombudsman has hardly any practical relevance. Because of the usual lack of resources, stations do without systematic media research, although most stations express a need for qualitative data or specific research.

Standards of quality assurance by OFCOM
For private broadcasters, only those organizations that have the potential to meet the requirements of a defined mandate are recognized for broadcasting licences. This mandate, however, leaves flexibility for individual interpretation. According to OFCOM, this requires – besides other elements – organizational forms of quality management. The programme autonomy guaranteed by the constitution prevents programme standards from being too detailed. That is why the mandate only describes these standards as abstract requirements concerning the programme content and completes these standards with requirements for the production process, which should enhance the likelihood that the programmes meet the constitutionally-required standards.

Thus, the requirements concerning quality assurance do not directly refer to the journalistic quality of a single production, or even a single news story, but to the organizational structures and processes which bring about these programmes. The organizations are obliged to establish a quality management system which – with regard to the journalistic production of programmes – includes the following (see UVEK 2007: 3, Article 6):

1. Quality goals and standards concerning form and content of the programme. They are to reflect the programming mandate and to specify the goals and standards of the single organization. These goals and standards are to be included in documents such as mission statements, editorial guidelines or editorial handbooks. The goals are to be made known among all employees. They are predominantly related to the quality dimension's relevance, as well as diversity of topics, opinions and actors.
2. Defined processes which allow for an ongoing control of whether stated quality goals are met. This includes for example briefings, production approval processes and institutionalized programme feedback, all in relation to the above mentioned goals and standards. Furthermore, the result of this feedback is to be made accessible for all employees.
3. Sufficient personal resources to fulfil the programming mandate. As far as human resources are concerned, training to meet the defined programme requirements is to be implemented.

Performance reviews with employees and written-down agreements on goals to be achieved help communicate the quality standards.

In July 2007, the Federal Council defined the VHF radio and local TV coverage areas with performance obligations and specified the number of licences. In September 2007, OFCOM put the licences out to tender. The deadline for submission of candidatures was December 2007. After this, OFCOM opened the public hearing on 52 radio and 20 TV licence applications. This process of public hearing ('Vernehmlassungsverfahren') can be seen as well as a kind of co-regulation. Up to this point, broadcasters could exercise significant influence on the implementation of the co-regulation process. Their 72 candidatures for the total of 54 licences could be consulted on the OFCOM website (OFCOM 2008) during the licensing process. OFCOM as the regulating body hopes that, thanks to this process, the goals brought about in the quality agreements and self-declared performance standards will be discussed more thoroughly internally. Furthermore, they wish to trigger a public debate on issues of media quality as well.

First effects: Empirical evidence
This article was written during the public-hearing phase. Thus it is possible to draw a first conclusion by carrying out a documentation analysis. This following analysis applies to 72 candidatures for the licences and focuses only on the elements of quality assurance. In their applications, the stations had to provide information beyond the quality management system, on various aspects of their business such as the rules of procedure, organizational charts, responsibilities, financial holdings and investments, nature of planned programme, information on production process and financing of programme and so on. With this information, they mostly delivered promises. These documents show what is planned to be installed in the following months until the first round of quality management evaluation.

All stations, without exception, state in their applications that they approve of the relevance of editorial quality management systems to optimize and improve the editorial performance. Roughly 60 per cent of all stations explicitly refer to the concept of Total Quality Management – a concept that in connection with media organizations had been an almost unknown term in Swiss and German editorial offices until recently (see Wyss 2002; Hermes 2006). 15 per cent of all TV stations and 8 per cent of all radio stations even refer to the EFQM model. Two thirds of all organizations reinforce in their applications the intention to have their quality assurance system regularly evaluated by an external body. 20 per cent of all TV stations and 13 per cent of all radio stations even consider an ISO certification.

In their applications, the programme providers went extensively into preventive, accompanying and corrective measures of intra-organizational quality assurance.

Table 1 lists the various measures along the logic of the assurance process. More than 90 per cent of all stations were able to supplement their application with an editorial mission statement. That is 15 per cent more than before OFCOM's intervention. 85 per cent of the TV stations and 73 per cent of the radio broadcasters have published journalistic guidelines – for example, printed in an editorial handbook. One third of all stations claims that these documents are regularly updated and amended, which is an indicator for the continuity and systematic approach of this quality assurance measure. At least every third station refers to the

Table 1: Quality Management Instruments.

	TV (N=20) in %	Radio (N=52) in %
1. Preventive measures		
Editorial mission statement	95	90
Editorial Handbook/Journalistic Guidelines	85	73
Training, external or internal	95/ 85	82/ 87
Management by Objectives (Quality goals)	70	60
Evaluation of employee satisfaction	15	0
Programme and issue planning	100	88
2. Measures accompanying the production process		
Briefings by superiors	50	46
Editorial conference	80	77
Approval of single broadcasts (Countercheck)	65	48
3. Corrective measures		
Feedbacks, internal or external	85 / 50	92 / 27
Ombudsman	5	6
Audience research	45	37
Evaluation of viewer / listener feedback	50	38

'Rights and Duties of Journalists' issued by the Swiss Press Council. Of course these documents cannot be seen as proof that the employees know the content of the policy. 25 per cent of all organizations say that discussions about their quality policy take place in internal events dedicated to this cause.

An exact analysis of the provided documents that refer to rules in the sense of quality goals and norms shows that they are based on only an approximate understanding of journalistic quality. According to OFCOM's requirements, all stations promise in their rules and regulations the existence of an independent editorial status, which is aimed at guaranteeing editorial independence in relation to the publisher or commercial management. The quality criteria discussed in the documents (mission statements and handbooks) mostly refer to the news, and focus on the quality dimension's relevance, diversity, adequacy, and comprehensibility as well as the provision of specific journalistic content for a certain regional community (for example to strengthen identity or enable a dialogue). More than half the stations identify relevance as a central quality goal, without giving any further information on what it stands for. To a similar extent, descriptions of quality criteria such as accuracy, correctness, balance, objectivity and transparency, or the separation of editorial and commercial programmes are found. Also mentioned are news values which create relevance, such as proximity (regional reference), timeliness, emotionality, conflict and prominence. With regard to the quality dimension of diversity, most stations simply repeat the demands from the programming mandate, without

further specifying these terms. Other quality goals such as reduction of complexity, orientation, analysis, scrutiny or providing of background information are hardly mentioned.

Another preventive measure mentioned in the documents is employee training. In that respect, OFCOM made specific demands: the broadcasters must prove that they offer their employees the opportunity for training. In earlier studies, it was repeatedly stated that over half the journalists considered the opportunities for training in their editorial teams to be inadequate (see Wyss 2002). Now, between 85 and 95 per cent of all stations state that they see internal or external training as a central quality assurance instrument and thus want to pay special attention to it. Other key points here are the evaluation of recruitment and personnel policy and of measures of employee satisfaction. The document analysis showed, however, that only 70 per cent of all TV stations and 60 per cent of the radio broadcasters manage according to agreed objectives or carry out regular performance appraisal. Only 20 per cent could provide corresponding questionnaires. Only 15 per cent of all TV stations say that they have regular employee satisfaction surveys. All TV stations and 88 per cent of all radio stations stated in their applications that they intend to make efforts to improve their programme and issue planning.

Looking at measures accompanying the production process renders a sobering picture. Only half the stations have quality-oriented employee briefings previous to the production process. Eight out of ten stations stress the relevance of their editorial conference. In the discussion of guidelines, the conference is cited as one of the most important instruments to ensure quality. Only 15 per cent make an effort, however, to protocol these discussions and to make the content accessible to the employees who are not present. Approval of single broadcasts before their emission, according to the TQM principle of 'preventing rather than correcting mistakes', is also far from being standard procedure.

Internal criticism of programmes is undoubtedly one of the most important corrective quality assurance measures. However, only 3 out of 10 stations have corresponding checklists which could be used for such feedback processes, but in 4 out of 10 cases, such feedback is written down and accessible for everybody. Less common are measures where external experts are invited to provide feedback. Interesting in that respect is that only 5 per cent of all stations refer to their already-existing ombudsman – the media organizations are required by law to provide one – as quality assurance institutions. Audience research for quality assurance is relevant to only 45 per cent of all TV stations and to 37 per cent of all radio stations. The evaluation of viewer and listener feedback does not seem to be systematically implemented everywhere.

Conclusions and outlook

The case of Switzerland as presented here shows that the implementation of concepts of co-regulation does indeed have the potential to engage media organizations in the sense of 'Media Governance', to have them make their quality goals transparent and identify quality oriented processes. The case proves that previous to the intervention by the regulatory body many media organizations made far less effort concerning quality assurance than afterwards. However, the analysis of the licence applications shows that many of the promised quality assurance processes have not yet been implemented. Some mission statements or charters were only produced immediately before putting together the application and had not been put in practice. Only the evaluation commissioned by the regulatory body will show to what extent the media organizations' intentions are just acts of hypocrisy. Because media organizations usually

strive for economic and financial goals as well, it remains doubtful whether a holistic quality management will be able to cope with these inconsistencies and streamline all organizational processes to achieve journalistic quality. Rather, it can be assumed based on Brunsson's (2002) concept 'The Organization of Hypocrisy' that in their quality management the duality between economic and journalistic goals is carried on and media organizations professionally feign: 'To talk in a way that satisfies one demand, to decide in a way that satisfies another, and to supply products in a way that satisfies a third' (Brunsson 2002: 27). At the same time, scepticism is also justified towards the regulator: although co-regulation is a concept which has considerable political resonance and can be interpreted as an initial step towards deregulation, the concept could also be seen as a 'charade' by the state, 'which would ostensibly convey the impression of an inclusive approach to law-making, but in reality ensure a covert continuation of the State-dominated status quo' (McGonagle 2002: 4).

Finally, this article shows that an analysis of media systems regarding their capabilities to provide independent and pluralistic media should focus not only on the absence of state intervention. Rather, it could be shown that co-regulation has the potential to strengthen and enhance media performance. If media organizations implement an effective media quality management system, it is more likely that the principles of 'Media Governance' can be achieved. So, by considering the 'Media Governance' perspective, to evaluate media systems also means to investigate whether the most important media organizations in a country have implemented concepts of co-regulation, which includes an effective quality management system.

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