



Archiving the Airwaves

Accountability of the Dutch Public
Broadcasting System

Jasper Snoeren

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Supervisor: Dr. Fiorella Foscarini
Second reader: Dr. Toni Pape
University of Amsterdam

jaspersnoeren@gmail.com
studentID 10646175

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I. Introduction

Public broadcasting is an important source for the study of society, culture and history of a country. Television programmes and radio shows present not only what happens in daily life, but also depict all layers of the populations and their way of living. Anyone of note in any field of interest, be it politicians, artists, sportsmen, academics or writers, find their way to the small screen and airwaves, as does the common man. Public figures adapt to broadcasting's imperatives so successfully, that it becomes uncertain whether they are being manipulated by broadcasting or they themselves are manipulating the media. Broadcasted television and radio programmes are an incredible source for the cultural history of a society, but they are only part of the story. Of equal interest are the processes that lie behind the making of these programmes and the workings of the organizations that produce them. This thesis will argue why, from a cultural-historical perspective, it is relevant and essential to document and archive the actions of the broadcasting organizations.

The written records of public broadcasting organizations have an incredible value for the national cultural memory of the Netherlands. However, because of the unique setup of the Dutch public broadcasting system, there is no centralized archival system for written records of the nation's broadcasting organizations. The Dutch public broadcasting system has a complex structure where various organizations, each with different backgrounds and mandates, work together in filling the airwaves. Rooted in the so-called *pillarization* of Dutch society in the 20th century, the airtime of the public television and radio channels is still shared by eight separate broadcasting associations today. These broadcasters provide the television and radio programmes, decide on the content and are responsible for it. However, a separate organization regulates distribution of airtime and of central government grants to the broadcasters: the *Nederlandse Publieke Omroep*, or NPO. The NPO also decides which programmes will be aired on the public channels and ensures that programming on each channel is recognizable and well-organized. The NPO is a non-governmental public body and as such has to comply with the Public Records Act of 1995 and is thus required to carry out archival policies. Contrary to this, all broadcasting organizations receive most of their funding from the government and the mandates to act within the public broadcasting system is laid down in the Media Act, but they are associations under private law, and as such they are independent from the government. In other words, even though the broadcasters fulfil a central position in Dutch cultural society and provide a public service, they are not legally required to keep the records that give account of their actions and functioning. This paradox is the main motivation for this thesis.

1.1 Research questions

Accountability for actions is strictly related to accountability for records, since the records may serve as evidence of the actions. This thesis will try to map out how the records of the Dutch public broadcasting are being kept and which archival procedures are in place to secure the accountability of the public broadcasting system. The underlying question that drives this thesis is how well the national heritage that lays in the Dutch broadcasting system is safeguarded. The argument that is made here is that cultural-historical value is not only to be found in the radio and television programmes (the output), but is also to be found in the substantive and operational records of the broadcasting organizations. By applying a functional approach to two case studies, the archiving practices of the Dutch public broadcasting system is studied as a whole. The main research question for in this study is:

How accountable is the Dutch public broadcasting system from a cultural-historical perspective?

To built toward the answer to this question, the following sub questions need to be addressed as well: what are the reasons for keeping broadcasting records; which are the functions of broadcasting and are all functions documented appropriately; what kind of records are currently archived within the public broadcasting system? Finally, the question arises whether it might be sensible for the public broadcasters to comply with the Public Records Act, as the NPO does. Before answering these questions in the conclusion, this thesis will reflect on the acquisition of broadcasting records by the Netherlands Institute for Sound and Vision as a possible solution to the archival issue of public broadcasting.

1.2 Theoretical and Methodological Framework

One of the traditional goals of archival research is to understand the nature of an institution and its documentary problems. In this thesis, archival research is conducted to shed light on the degree of accountability of the public broadcasting system as a whole. However, since it is impossible within the scope and timeframe of this research to study each individual organization of the broadcasting system, this thesis will at its heart take the form of two case studies. The recordkeeping practices of two organizations are researched in-depth and are meant to be illustrative for the entire broadcasting system. The selected organizations should therefore be seen as exemplary for the public broadcasting system as a whole. As was explained in the introduction of this thesis and as will be discussed further in chapter II, the Dutch public broadcasting system can be divided into two kinds of organizations: the governing bodies – like the NPO or the Dutch Media Authority – that have to

comply with the Public Records Act on the one hand; and on the other, the broadcasting organizations, which have no legal obligation to keep their records. One of either kind of organizations is selected for this study: the VPRO, to represent the broadcasters, and the NPO as a representative of the non-governmental public bodies. The VPRO is one of the oldest broadcasters (1926) and still exists on its own, while most other broadcasters merged due to a recent reorganization of the broadcasting system. Because of its long history and in the absence of uncertain or unaccustomed situations because of mergers, the VPRO makes a fine subject for a case study. The NPO in its current capacity is a fairly new organization in the broadcasting system (2008), but it takes a central position as governing body for the television channels and radio stations. The legal framework that the Public Records Act provides for archiving at the NPO is the same as that for other non-governmental bodies in the public broadcasting system, for instance the Dutch Media Authority. Therefore, the findings from the case study of the NPO should be applicable to the Dutch Media Authority as well.

The two case studies that are at the centre of this thesis are theoretically grounded in archival science and rely on functional analysis as a methodological framework. The method of functional analysis is used to investigate the activities and the actors that must be documented to achieve a full understanding of an institution. Ideally, most of the activities that are carried out in an organization should be documented in official records, but in practice this is not always the case. This thesis applies the functional approach to identify the purposes and main goals of the broadcasting organizations in their separate mandates. By establishing the functions of the broadcasters and the NPO it becomes possible to place their records in context – and, in archival science, “the context is all.”¹ Furthermore, a function approach allows for comparisons across similar organizations. Even when recordkeeping in practice is carried out differently at each broadcaster, their overall functions are still the same, or at least comparably similar. Thus, the results of the functional analyses carried out in the case study organizations could be extended to the other broadcasters as well. Starting with a review of Schellenberg’s function-based classification model, functional analysis as a method in archival science is explained further in chapter IV, followed by the identification of the functions of broadcasting.

The case studies have been carried out through interviews and document analyses. The meetings with archiving staff at the VPRO and NPO were deliberately kept casual and without formal interview protocols to stay close to the casual, everyday working atmosphere that is normal in Dutch

¹ Heather MacNeil, "The Context is All: Describing a Fonds and its Parts in Accordance with the Rules for Archival Description," in *The Archival Fonds: From Theory to Practice*, ed. Terry Eastwood (Ottawa: Bureau of Canadian Archivists, 1992): 195-225.

broadcasting. After all, the intent of this thesis is mainly to be descriptive of archival practices, and to analyse the latter through a critical lens without being judgemental. Three people were interviewed in the course of the case studies. On behalf of the VPRO the responsible radio and television archivist are interviewed. Both of them are responsible for drafting and carrying out the archival policies concerning radio and television records, respectively, and are accountable to the board of directors directly. The third interviewee is the senior archivist at the Central Archives of the NPO. The Central Archives fall directly under the responsibility of the board of directors. The NPO meetings took place at the end of June 2016; the VPRO archivists were interviewed in July. The interview findings are complemented with the analysis of any documentation regarding archival policies and regulations that the interviewees could provide. Both internal documents and publicly available documents (e.g. retention schedules) are studied closely.

The case studies are first embedded in a theoretical and legal framework to place the research in a comprehensive archival context. Before taking a look at the archival practices of the public broadcasting system, this thesis argues why it is important to keep broadcasting records in the first place. Building on the writings of Thomassen and Shepherd & Yeo, the three reasons for organizations to keep and use records are traced and placed in a broadcasting perspective. Using Eastwood and Parkinson, the concept of accountability is examined and applied to Dutch public broadcasting. In addition, special attention is given to the cultural-historical value of broadcasting records, arguing why broadcasting records should be archived as an important part of the national heritage. The reasons for keeping broadcasting records are addressed in chapter III. Apart from functional analysis, chapter IV provides the legal framework for archiving that stems from the Public Records Act. Dutch organizations that have to comply with the Act are required to follow formal retention and disposition schedules when appraising their records in order to identify the records that have permanent value and those that can be disposed of. Those schedules are based on a macro-appraisal method introduced by the Dutch PIVOT project. Since the NPO has to comply with the Public Records Act, PIVOT and its selection criteria are described to give the required legal context.

Before getting into archival theories and practices, the next chapter offers an overview of Dutch public broadcasting and places it in its socio-historical context. The history of this unique broadcasting system is explained in the light of the social and political structure of pillarization that lies at the foundations of this complex system.

First, however, it should be emphasized that this thesis will focus on the written records of broadcasting only. The specific field where this research is conducted obviously deals with many

audio-visual records. However, since television and radio programmes are the *end-products* (or assets) of the broadcasters, they are out of scope for this thesis. 'Written records' in this paper is understood as text-based archives/records, that is, non-audiovisual material. Photographs are excluded from this 'written records' category, even though one could argue that photographs are written with light. In other words, this thesis makes the distinction between written (i.e. text-based documents) and audiovisual records (i.e. videos, audio recording, photographs, etc.). Written records include both records on paper, as well as digital-born and digitized textual records.

II. Public broadcasting in the Netherlands

The contemporary Dutch public broadcasting system has a complex structure with various broadcasting associations sharing the same television and radio channels, dividing the available airtime among each other. This system is rooted in institutional, technological and cultural developments in the first few decades of the previous century, when radio was still a fledgling medium. Further political interference and legislation eventually led to the current system where production of programmes is separated from governance of the channels. Much has been written about Dutch broadcasting history.² This chapter will give a brief account of events intending to offer some relevant background to this thesis, before describing the current broadcasting system in more detail.

2.1 Brief history of Dutch public broadcasting

Dating back to the mid-1800s, Dutch society was heavily pillarized, meaning that society was politico-denominational segregated. Society was divided into several so-called 'pillars' (in Dutch: *zuilen*) according to religious or political ideologies. Each pillar had its own social institutions, like: newspapers, political parties, trade unions, farmers' associations, schools and sports clubs. Often people even favoured certain stores within their own pillar. This strong divide in social and work life led to a situation where people had little or no personal contact with people belonging to another pillar. Pillarization could on the one hand develop because of emancipation of the working and lower-middle classes, resulting in social parties and trade unions. On the other hand pillarization emerged from the execution of control over social and religious groups by new and old elites. In the Netherlands, the main pillars were grounded in the Catholic, Protestant and social-democratic ideologies. A fourth category contained people who were not associated with one of the three pillars. They were mainly middle and upper class latitudinarian Protestants and atheists. The social institutions in this 'general' pillar had weaker links to one another.³ In such a segregated society it should not come as a surprise that pillarization also found its way into the new mass-communication medium of radio.

² For instance: *Een Eeuw van Beeld en Geluid. Cultuurgeschiedenis van Radio en Televisie in Nederland*, red. Bert Hogenkamp, Sonja de Leeuw and Huub Wijfjes (Hilversum: Nederlands Instituut voor Beeld en Geluid, 2012); *Omroep in Nederland. Vijfenzeventig jaar medium en maatschappij, 1919-1994*. red, Huub Wijfjes (Zwolle: Waanders Uitgevers, 1994).

³ Arguably, this can't be called a "pillar" as such, because liberals rejected the idea of a segregated society.

Taking inspiration from the developments in radio broadcasting in the United States, the *Hilversumse Draadloze Omroep* (Hilversum Wireless Broadcasting Company, HDO) was founded in 1924. Although there were several earlier radio enthusiasts pioneering away with broadcasting, HDO saw the potential of radio as a mass medium and started national radio broadcasts of comedy shows and popular music. Hoping to increase the sales of its do-it-yourself radio sets, the major technology company Philips was one of HDO's first sponsors. Philips not only provided funding for HDO's programmes, but more importantly provided the two powerful radio towers that guaranteed nationwide reception.⁴ HDO, soon to be renamed into *Algemene Vereniging Radio Omroep* (General Association of Radio Broadcasting, AVRO) – hoped to become the sole national broadcasting agency, much like the BBC had become in the UK. It saw its aspirations crumble, however, when its sponsor started renting airtime to other fledgling broadcasters, forcing the AVRO to share the radio station. Several influential groups in Dutch society showed interest in the new medium as a way to spread their ideologies. Primarily organised from within the religious and socialist pillars, four new broadcasting organizations arose between Christmas 1924 and the summer of 1926. The Calvinist movement, believing they should use all means God offered to spread the Word, founded the *Nederlandse Christelijke Radio Vereeniging* (Dutch Christian Radio Association, NCRV). For similar reasons, the *Katholieke Radio Omroep* (Catholic Radio Broadcasting, KRO) was formed by the Catholic Church. To make sure the socialist ideals wouldn't get lost among the strong religious voices from the KRO and NCRV, several local socialist groups combined efforts and set up the *Vereeniging van Arbeiders Radio Amateurs* (Association of Worker Radio Amateurs, VARA). The VARA soon had strong ties with the labour parties. The fourth new broadcaster, the *Vrijzinnig Protestantse Radio Omroep* (Liberal Protestant Radio Broadcasting, VPRO), was much smaller. The VPRO voiced the humanistic traditions of liberal Protestantism and, together with AVRO, belonged to the general pillar.⁵ Because of pillarization, the Christian and socialist broadcasters had strong relations with their political counterparts, ensuring influence in the government.⁶ This political back-up paid off when the government first intervened in the broadcasting system in 1930 and granted the four largest broadcasters (NCRV, KRO, VARA and AVRO) the right to provide most of the programming on two henceforth government controlled national radio stations. The AVRO was forced to share its station with the VARA, while the two Christian broadcasters NCRV and KRO were appointed to a new, second radio station. Only a small amount of airtime was given to the VPRO (and a few even smaller

⁴ Huub Wijffjes and Bert Hogenkamp, "De dageraad van de eeuw van beeld en geluid, 1900-1930," in *Een Eeuw van Beeld en Geluid. Cultuurgeschiedenis van Radio en Televisie in Nederland*, ed. Bert Hogenkamp, Sonja de Leeuw, and Huub Wijffjes (Hilversum: Nederlands Instituut voor Beeld en Geluid, 2012): 45.

⁵ *Ibid.*, 47-50.

⁶ Both the KRO and VARA even laid down political affiliations in their statutes.

groups). This first government involvement in broadcasting ensured that these five broadcasting organizations became a permanent feature in the Dutch public broadcasting system.⁷

Although HDO/AVRO originally started out with ties to commercial parties (i.e. Philips), the broadcasters were later quick to discard any commercial affiliations. The new government terms ruled that radio shows would be of “relaxing, informative, political, aesthetical, ethical and religious nature, (...) to which no one would reasonably take offence.”⁸ The broadcasters felt that any form of commercial influence could harm their role as society’s educators and would endanger said values. Keywords in the government ruling were independence and autonomy, which also meant the broadcasters had to finance their activities and facilities from subscriptions and selling programme guides, without revenue from radio taxes. Consequently, there was much competition among the broadcasting organizations in their urge to win over contributors and subscribers, but it also resulted in strong ties between broadcaster and subscriber. In 1930 all five broadcasters had more than 100.000 paying supporters,⁹ by 1960 the big four (AVRO, KRO, NCRV, VARA) were well far above half a million subscribers each.¹⁰ The reliance on subscribers proved to be of lasting importance for the broadcasters, and for decades the number of contributors continued to influence airtime.¹¹ This made for a highly democratic system: by joining or terminating affiliation, viewers/listeners could directly give or take away approval to the broadcasters. Even today the amount of subscribers is still a decisive factor in admitting a broadcasting organization to the public broadcasting system, although its importance to established organizations is toned down considerably.¹²

After World War II the broadcasting system was restored to former situation, despite ill attempts to form a single national broadcasting agency. The broadcasters did however establish a combined facilities management organization, the *Nederlandsche Radio Unie* (Dutch Radio Union, NRU), which from then on would take care of technical services and radio orchestras.¹³ Although collaboration among the broadcasters was still lukewarm, a similar multi-faceted organization was set up for television after the Dutch government gave permission to start experimenting with television broadcasts in 1951. The *Nederlandse Televisie Stichting* (Dutch Television Foundation, NTS) would tend to programme scheduling and facilities management. From 1956 onwards the individual broadcasters started airing television shows in a system equivalent to the pillarized radio

⁷ Huub Wijffjes, “Veelkleurige Radiogemeenschappen, 1930-1960,” in *Een Eeuw van Beeld en Geluid. Cultuurgeschiedenis van Radio en Televisie in Nederland*, ed. Bert Hogenkamp, Sonja de Leeuw, and Huub Wijffjes (Hilversum: Nederlands Instituut voor Beeld en Geluid, 2012): 61-63.

⁸ Ibid., 64. [Translation by the author]

⁹ Ibid., 62.

¹⁰ Ibid., 74.

¹¹ The relation between number of subscribers and airtime existed until it was dropped in the Media Act of 2000.

¹² Media Act 2008, sections 2.25 and 2.26.

¹³ Wijffjes, “Veelkleurige Radiogemeenschappen”, 73.

broadcasting system.¹⁴ New, however, was the introduction of television tax for citizens owning a television set. Revenue from this tax would fall to the broadcasters directly.

After an attempt to set up (illegal) commercial television broadcasting from the North Sea was averted by the government in the previous year, the *Televisie en Radio Omroep Stichting* (Television and Radio Broadcasting Foundation, TROS) entered the public broadcasting system in 1964 as the legal heir to its now forbidden commercial predecessor. The TROS explicitly dismissed political or religious affiliation and opted for light and informal programming directed at a broad, general public.¹⁵ This proved a successful strategy and it encouraged the other broadcasters to also focus on more entertainment on television.¹⁶ By the second half of the sixties, new governmental legislation had become inevitable. Disagreement over commercialism in the Dutch broadcasting system even led to a ministerial crisis, resulting in the fall of the Marijnen administration in 1965.¹⁷ The new Broadcasting Act of 1967 was a compromise between pillarization and an open system. On the one hand, commercialism was explicitly prevented and broadcasting organizations were not allowed to make profits. On the other hand, advertising was introduced, albeit heavily regulated (i.e. no more than 10% of the airtime and never within programmes). Advertising revenues were used to finance the broadcasters. The Broadcasting Act also led to the merger of the NRU and NTS into the *Nederlandse Omroep Stichting* (Dutch Broadcasting Foundation, NOS), to promote collaboration between the individual broadcasters and schedule public service programming.¹⁸ Furthermore, the Broadcasting Act of 1967 made it easier for new public broadcasters to enter the system. Most notably the *Evangelische Omroep* (Evangelical Broadcasting, EO), a split-off of the NCRV, emerged.

The next twenty years saw plenty of debates concerning Dutch public broadcasting and several changes or additions were made to the Broadcasting Act, but in retrospect these posed but minor changes in the broadcasting system in general. It was not until 1988 that intensified discussion regarding commercial television culminated in new legislature that allowed foreign commercial broadcasters to air in the Netherlands. This proved to be a legal backdoor soon used by aspiring Dutch commercial broadcasters to start Dutch-language programming through stations in Luxembourg. Consequently, commercial broadcasting was fully legalized in the Netherlands in 1992.

¹⁴ Andreas Fickers, "Op Zoek naar Televisie, 1925-1960," in *Een Eeuw van Beeld en Geluid. Cultuurgeschiedenis van Radio en Televisie in Nederland*, ed. by Bert Hogenkamp, Sonja de Leeuw, and Huub Wijfjes (Hilversum: Nederlands Instituut voor Beeld en Geluid, 2012): 126-127.

¹⁵ Sonja de Leeuw, "Televisie Verbindt en Verdeelt, 1960-1985," in *Een Eeuw van Beeld en Geluid. Cultuurgeschiedenis van Radio en Televisie in Nederland*, ed. Bert Hogenkamp, Sonja de Leeuw, and Huub Wijfjes (Hilversum: Nederlands Instituut voor Beeld en Geluid, 2012): 153.

¹⁶ This 'dumbing down' of television by reducing educational programming in favour of entertainment under the influence of the TROS even introduced the verb *vertrossing* in the Dutch language.

¹⁷ De Leeuw, "Televisie Verbindt en Verdeelt", 166.

¹⁸ *Ibid.*, 166-167.

The (by now nine) most important public broadcasters were forced to stop competing amongst each other and started collaborating more intensively to hold ground against the commercial opponents. This resulted in less subscriber-oriented, but more channel-oriented production of broadcasts, with scheduling on the three public television channels categorized in themes, or profiles: mainstream/human-oriented; popular entertainment; and social-oriented. The method of 'channel-profiling' is still a vast foundation of the public broadcasting system. The main principle of the system is no longer the individual broadcaster: its programmes must be serving the profile of the channel.¹⁹

In the new millennium, the public broadcasting system became even more centralized when broadcasting concessions were no longer granted to individual broadcasters, but to the NOS as representative of the broadcasters. The NOS itself was also restructured when the organization was split into two branches: a governing body for the broadcasting system (the 'administrative NOS') and the broadcaster NOS that was tasked with covering news and sports programming. The NOS's former tasks of cultural, educational, and youth programming were placed under the newly formed NPS (soon renamed into NTR). In 2007, the administrative NOS was reformed into a separate organization: the *Nederlandse Publieke Omroep* (Dutch Public Broadcasting foundation, NPO). The NPO is responsible for protecting the interests of all public broadcasters and is assigned the responsibility for scheduling on the public channels.²⁰ Furthermore, in order to gain more control over public broadcasting expenses, the government included the former television en radio taxes into the general income tax in 2000. This way, broadcast funding was no longer free-standing but was made dependent on government-established budgets.²¹ Much to the broadcasters' fears, it did not take long before major budget cuts were announced, forcing the system to reorganize itself more effectively. Accompanying a major cut back of 200 million Euros in 2015, the government determined to limit the number of public broadcasters allowed in the system. In effect since January 2016, the new amendment gives broadcasting concessions to only eight broadcasters. The new government rulings forced many of the old, established broadcasters to merge – administratively at least – in order to stay in existence. The new situation sees three merged broadcasters (AVROTROS, BNN/VARA, and KRO-NCRV) and three stand-alone organizations (VPRO, EO, and Omroep MAX).²² The remaining two spots are filled by the NOS and NTR, both being broadcasters whose existence is

¹⁹ Sonja de Leeuw, "Televisie en Actief Publiek, 1985-2000," in *Een Eeuw van Beeld en Geluid. Cultuurgeschiedenis van Radio en Televisie in Nederland*, ed. Bert Hogenkamp, Sonja de Leeuw, and Huub Wijfjes (Hilversum: Nederlands Instituut voor Beeld en Geluid, 2012): 244-245.

²⁰ Ibid., 246.

²¹ Ibid., 245.

²² Being the two youngest broadcasters, BNN (1997) targets young adults while MAX (2002) focuses on people of age 50 and older.

laid down in the Media Act.²³ Many small and/or one-issue broadcasters ceased to exist or were absorbed by the other eight.

Dutch public broadcasting is firmly rooted in the pillarization of society which characterized Dutch society between the mid-19th Century and the 1960s.²⁴ Broadcasting organizations were set up to express ideals and beliefs to followers belonging to the same pillar. In the media this segregation of society was most visible. However, paradoxically, broadcasting also turned out to be the unintentional driving force behind depillarization in later years.²⁵ Being mass-communication, broadcasted programmes by definition could not stay within the borders of its pillars, meaning that anyone could tune in to programmes from competing broadcasters. Aided by the limited airtime and few channels,²⁶ the public en masse watched programmes from other pillars. There turned out to be a concealed, yet fundamental difference in media production and media consumption. While the broadcasters themselves stood as guardians of their pillar's ideology, their viewers started to care less about the underlying messages and tuned in to shows from different flavour just as easily. Television as a medium had the means to tear down the pillars of society²⁷ and it did just that: from the late sixties onward, the foundations of pillarization crumbled. However, even though Dutch society stands depillarized today, the remains of that socio-political construct can still be found in the public broadcasting system. The pillarized organization of the public broadcasting system has been maintained in legislation and even the current Media Act of 2008 states that broadcasters need to "represent a certain societal, cultural or religious movement in Dutch society."²⁸ Although most of today's programmes will not appear to be of a specific political or religious colour, the recent mergers of four of the original broadcasters still echo the pillarized backgrounds of the organizations (religious broadcasters KRO and NCRV on the one hand, general pillar broadcasters AVRO and TROS on the other). However, most striking for depillarization is that the once small, mostly 'colourless' broadcaster VPRO nowadays stands big enough to survive budget cuts mostly on its own.

2.2 The Dutch public broadcasting system

Public broadcasters are largely dependent on government funding, which means they are financially accountable towards the government. At the same time, independency is a key value for public broadcasting to operate properly. How can the necessary political independency of public broadcasting from government and its equally necessary financial dependency accountability be

²³ Media Act 2008, sections 2.2.2 and 2.2.3, resp.

²⁴ Depillarization started the sixties, but it took several decades before pillarization disappeared completely.

²⁵ Other main reasons for depillarization are growing wealth and secularizing of society.

²⁶ There was but one television channel in the Netherlands until 1964. The third public channel only started in 1988.

²⁷ De Leeuw, "Televisie Verbindt en Verdeelt", 153.

²⁸ Media Act 2008, section 2.24, paragraph 2c. [Translation by the author]

reconciled? In order to solve this paradox the broadcasting system needs to be set up in such a way that freedom from undesirable state control for broadcasters is combined with the adequate level of financial accountability.²⁹ The relationship between public broadcasting and government should be as transparent as possible, while at the same time a certain distance between the two is maintained. The Dutch public broadcasting system is currently modelled in a way that separates media production (broadcasters) from governance (NPO) and evaluation (Dutch Media Authority) of the system. Figure 2.1 gives a schematic representation of the Dutch broadcasting system.

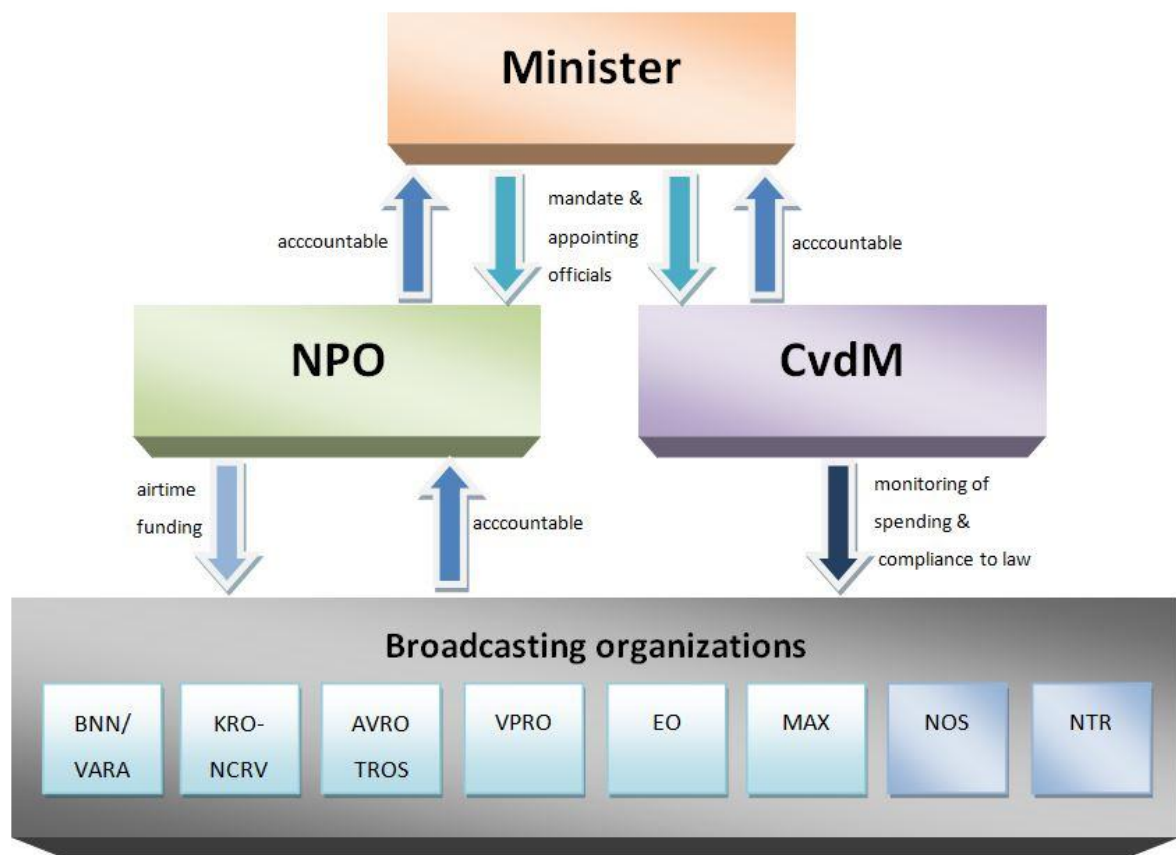


Fig. 2.1: schematic representation of the Dutch broadcasting system

Administration of the public broadcasting system is in the hands of the NPO. As such, the NPO can be conceived as an intermediary between the government and the broadcasters. Being the governing body of the broadcasting system, the NPO is legally tasked with implementing the public service media directive³⁰ and the NPO's main objectives are providing broadcasters with air time and funding. The media budget is not allocated by the Ministry of Education, Culture and Science to the

²⁹ Accountability and values of broadcasting are discussed in more detail in chapter 4

³⁰ The public service media directive will be discussed in more detail in paragraph 3.4.

broadcasting organizations directly, but is distributed through the NPO instead.³¹ This is meant to avoid state control or political interference in production and broadcasting. The NPO's predecessor was a voluntary cooperation between the broadcasting organizations aimed at serving their collective goals. However, in the course of time the government extended its control over the broadcasting system, resulting in the broadcasters becoming less influential in the NPO. The organization changed from a mere facilitative bureau into the regulating body it is today. The broadcasters now have to conform to the NPO's policies instead of devising their own course individually.

The NPO is above all an administrative body with the mandate to regulate a complex domain full of different actors, motives and goals. The media sphere is subject to constant change – not in the least because of shifting political views – forcing the NPO to reorganize itself regularly to adapt to this ever-changing landscape. Currently, the NPO consists of three departments:

1. a *Supervisory Board*, whose members are appointed by the Minister directly and whose main task is to oversee the NPO's long-term strategies and the implementation of the public service media directive;
2. a *Board of Directors*, which is concerned with the executive tasks of the NPO and is responsible for the coordination and scheduling of the public broadcasting channels. Until 2004 the Board of Directors of the NPO was formed by board members of the broadcasting organizations, but nowadays the Board consists of independent officials. The Board of Directors is not appointed by the Minister directly, but by the Supervisory Board; and
3. a *Committee of Broadcasters*, which looks after the broadcasters' interest and advises the Board of Directors on scheduling strategies and policies. The Committee consists of one delegate per broadcasting organization.

Besides this structure, each radio station and television channel has its own coordinator within the NPO.

Another intermediary between government and broadcasting organizations is the *Commissariaat voor de Media* (Dutch Media Authority). The Commissariaat upholds the rules that are formulated in the Media Act, and supervises all television and radio channels (both public and commercial broadcasting). The Commissariaat systematically monitors compliance with the rules on quotas, advertising and protection of minors. It also grants licences to commercial and regional broadcasting

³¹ Media Act 2008, section 2.2.

organizations.³² As to public broadcasting, the Commissariaat's main concerns are the rightful spending of government funds and the evaluation of suspected commercial activities of the public broadcasters (which is overall prohibited under the Media Act). Evaluation by the Commissariaat only occurs after the fact. The government, the Commissariaat included, has no authority over the form or content of radio or television broadcasts. Protected by the constitution from government control and censorship, only a broadcaster itself is responsible and accountable for what it airs and can be reprimanded only afterwards, if the broadcast is in violation. The Commissariaat can issue warnings and impose fines if a violation is determined, and can impose additional penalties if a sanction decision is not complied with. In other words, the Commissariaat protects the independence, pluralism and accessibility of broadcasting, and by doing so, the Commissariaat supports freedom of information. The Board of Commissioners is appointed by the Minister of Education, Culture and Science.

Both the NPO and the Commissariaat are a *zelfstandig bestuursorgaan* (non-departmental public body, ZBO). A ZBO is an organization to which the government has devolved power and which has public authority. The organization is self-determining and has the authority to take autonomous legal decisions.³³ Although individual ministerial responsibility still applies, a ZBO is not hierarchically subservient to the Minister. This means that the Minister appoints officials and gives the mandate under which the ZBO operates, but he or she cannot directly guide or interfere with the way a ZBO carries out its tasks. ZBO's are, however, accountable to the Minister.³⁴ In other words, a ZBO carries out its work at arm's length from the government, ensuring freedom from direct state control. Being a public body, a ZBO is subject to the Public Records Act and as such both the NPO and the Commissariaat have a legal obligation to conduct archival practices according to what is stipulated in the 1995 Public Records Act.³⁵ In contrast, the broadcasting organizations are associations under private law without formal public authority and, as such, do not have to comply with the Public Records Act.

³² The Commissariaat is also charged with monitoring retail prices for books. However, this secondary task is of no interest for this thesis.

³³ "Zelfstandige bestuursorganen (zbo's)," Rijksoverheid, accessed May 12, 2014,

<https://www.rijksoverheid.nl/onderwerpen/rijksoverheid/inhoud/zelfstandige-bestuursorganen>

³⁴ S.A. Blok, Minister voor Wonen en Rijksdienst, "Notitie ministeriële verantwoordelijkheid bij zelfstandige bestuursorganen." (Tweede Kamer Note, 12-05-2014).

³⁵ Public Records Act 1995, section 41.

III. Why keep broadcasting records?

To understand why archives of broadcasters are of value to society, this chapter will analyze the reasons for recordkeeping for organizations in general and broadcasters in particular. The concept of accountability will be carefully defined from a theoretical perspective and applied to broadcasting organizations. Furthermore, the cultural-historical value of public broadcasting will be examined in this chapter, with the aim of supporting the argument that their records should be considered national heritage and that it is therefore important for broadcasters to manage their records with care and consideration. In other words, by answering the question *why* broadcasters should keep their records, this chapter will give the foundation for research into *what* records are in fact kept and thus how accountable the public broadcasters actually are.

3.1 Why keep records?

Broadcasting associations need records just like any other type of organization. Records are used to conduct business, to enable decision-making and to take action. Records are understood as information created, received, and maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business.³⁶ Records are the result of the (conscious or subconscious) decision to document an action, but they are distinguished from other documents by the reasons for their creation. As information that is generated by and linked to coherent work processes, records reflect the context of those processes.³⁷ Records function as the memory of individuals, of organizations and of society as a whole. Where records will help an individual person simply to remember or to be reminded, organizations need records to provide explanations for their dealings and to give account of their conduct. An organization's records may be required to prove what actions were (or weren't) taken in the past, to recall why decisions were made or how policies came to be. Here, records function as a corporate memory, allowing the organization to keep running while documenting its own history. A society does not create records itself, but stimulates (and calls on) individuals and organizations to create them and to preserve

³⁶ International Organization for Standardization. Information and Documentation: Records Management. 15489-1. Part 1. Geneva: ISO, 2001.

³⁷ Theo Thomassen, "A First Introduction to Archival Science," *Archival Science* 1 (2001): 374.

records of enduring cultural value to help construct a collective memory that reflects the values of this society.³⁸

In their *Handbook of Principles and Practice* (2003), Elizabeth Shepherd and Geoffrey Yeo describe the purposes and values of records.³⁹ They distinguish three broad reasons for organizations to keep and use records. They are either used for 1. *business purposes*, 2. in support of *accountability*, or 3. for *cultural purposes*.⁴⁰

1. When used for *business purposes*, records support administrative actions, regulation, economic activities or dealings between individuals and organizations. Records document which tasks are performed, how and why they are conducted and by whom. They ensure that work is done efficiently and effectively, by harmonizing actions and transactions within business processes.
2. Records support *accountability* as they can be used to prove that the organization or its employees follow the rules and comply with legal requirements. Trustworthy records not only give reliable evidence of decisions taken or commitments made, but also give account of the motivation for these decisions or policies. Organizational accountability is two-sided: within the organization, staff members use records to give account of their actions to their superiors. At the same time, the organization as a whole is accountable to the outside world. This external accountability is particularly important to public sector bodies like broadcasters, since these organizations need to legitimize their actions towards both the government and the wider public.
3. The *cultural purposes* of records surfaces when they are used in a historical sense and help construct a collective memory. Organizational records here serve the purpose of positioning the organization in the wider society. Thomassen adds to this cultural-historical purpose of records, that it is sometimes also attributed to records that were not deliberately created as a reminder of the past: “a fairly small portion of those records that by aging have lost their evidential functions, are preserved because they are regarded as part of cultural heritage and as a potential source for historical research.”⁴¹

Following the three purposes of recordkeeping, Shepherd and Yeo describe the values records can have when used. They make a distinction between *evidential* value, *informational* value and value of

³⁸ Thomassen, “A First Introduction,” 375.

³⁹ Elizabeth J. Shepherd and Geoffrey Yeo, *Managing Records: A Handbook of Principles and Practice*, (London: Facet Publishing, 2003): 155-157.

⁴⁰ This distinction is in fact common ground in current archival literature. It is, for instance, also recognized in Thomassen’s three functions of records: records are created and kept for *operational management*, as *agents of accountability*, or because of their *cultural-historical function* (Thomassen, “A First Introduction,” 375-376).

⁴¹ Thomassen, “A First Introduction,” 376.

records as *artefacts*.⁴² Records may be needed because they deliver proof that an activity took place or they can be needed as source of information, when the user seeks particular knowledge or facts. Records hold value as physical artefact when users are interested in their aesthetic qualities, tangibility or symbolic meaning. However, in practice, these values can be intermixed.

When organizational records are used internally, business purposes and accountability predominate. Business purpose combines both the evidential and informational value of records, while accountability is purely concerned with the evidential value. For external users, records no longer hold their primary business purpose. While accountability again is an important purpose for this group, most external use of records is focussed on the cultural purposes with many users seeking information for personal or academic research, education or because of an interest in the physical representation of a record as an artefact.⁴³

With their explanation of purposes and values of records, Shepherd & Yeo offer an excellent framework to argue why broadcasting records should be and need to be kept. In the following paragraphs each of the three purposes for recordkeeping will be studied more closely in a broadcasting perspective.

3.2 Operational management at broadcasting organizations

Records serve in the first instance to support operational management. They ensure continuity in the business processes, document decision-making practices and support the tasks that lead to achieving the organization's objectives. In other words, records make it possible for an organization to perform properly and efficiently. In theory, this works just the same for broadcasting agencies as it would for other types of organizations. However, according to Ernest J. Dick, archivist at the Canadian Broadcasting Corporation, there is but little interest in records management at broadcasting organizations.⁴⁴ He writes that broadcasters "rarely have developed model records management policies and procedures for their [records]."⁴⁵ Dick's explanation for this lack of interest is that broadcasting organizations primarily deal with communication. Their product is both information and entertainment, packed in the form of a television or radio programme. These end products warrant

⁴² Although describing both *evidential* and *informational* values of records, Shepherd and Yeo note that they use the words in a slightly different sense than in Schellenberg's taxonomy of values (Schellenberg, *Modern Archives* (1956)).

⁴³ Shepherd & Yeo, *Managing Records*, 157-161.

⁴⁴ Ernest J. Dick, "An Archival Acquisition Strategy for the Broadcasting Records of the Canadian Broadcasting Corporation," *Historical Journal of Film, Radio and Television* 11:3 (1991): 253-268.

⁴⁵ *Ibid.*, 264.

consideration for potential preservation as archival records in themselves because of their uniqueness. For many broadcasting archives these audiovisual assets are indeed their main concern. Broadcasters have in their archival appraisal and acquisition strategies a strong, almost exclusive focus on the audiovisual end products. An understandable attitude for an organization that has a natural (and possibly financial) interest in the rebroadcast or reuse of their products. Nonetheless, there is a distinct difference between broadcasted programmes and the records that document the processes that lead to such programmes being aired; a distinction that is too often confused or overlooked. On its own, a programme only has informational value and can serve as proof of its own creation only, whereas the records generated during the process of creating the end product contain potential evidential value as well. Meaning and research values are not found in individual documents (either audiovisual or written), but are derived from information in aggregates of records.

To Dick it is understandable that broadcasting organizations have but limited interest in record keeping, considering broadcasting takes place in a culture strongly absorbed with catching immutable deadlines for the airing of the next programme. Indeed, broadcasters are “preoccupied with the immediate future and cannot afford to be distracted by the past. Tomorrow’s programme slot will arrive exactly on schedule and cannot be delayed.”⁴⁶ The ability to quickly adapt to last minute contingencies before live broadcast is a measure for their success, but leaves less attention towards records management and archival activity. Furthermore, in the words of Dick: “the ephemeral and transitory nature of broadcasting further contributes to its non-permanent, non-archival character. The final product of a broadcaster is the transmission of a programme over the airwaves (...) rather than a tangible ‘document’.”⁴⁷

Another reason for the broadcaster’s absence of recordkeeping interests that Dick acknowledges is the lack of conventional hierarchical bureaucracy, which is usually found in other types of organizations.⁴⁸ The need for last minute adaptable programming yields a situation where a great deal of control is left in the hands of the creative and journalistic staff that is forced by deadlines to make ad-hoc and often undocumented decisions. Furthermore, broadcast decision-making is highly decentralized in nature, especially in the Dutch public broadcasting system, where many different broadcasting organizations work together (while at the same time competing) in filling the airtime. As a result, business processes that eventually lead to television and radio programmes are conducted in a number of different places and within several lines of business, making comprehensive records management problematic. Thus even though records have strong purposes

⁴⁶ Dick, “An Archival Acquisition Strategy”, 254.

⁴⁷ Ibid.

⁴⁸ Ibid., 255-256.

in supporting operational management and conducting business, the situation for broadcasting organizations shows that record keeping in this field unfortunately is not self-evident.

3.3 Accountability and public broadcasting

There are many ways in which organizations may be accountable: they must meet, for instance, legal or fiscal requirements, undergo various inspections or they need to be able to provide explanations for decisions that were made. In archival theory, accountability is defined as the ability to answer for, explain, or justify actions or decisions for which an individual, organization, or system is responsible.⁴⁹ For Jane Parkinson, who elaborated exhaustively on the term in her 1993 master thesis, accountability is not just the ability, but rather “the *obligation* of a delegate to render account or answer for the discharge of duties or conduct [emphasis added].”⁵⁰ Records are crucial to meet this obligation of accountability, because they are tangible evidence of the performance of the transactions they were created to accomplish. Records not merely provide information, which may be derived from other sources just as well, but they give first-hand account of the actions taken.⁵¹ Parkinson’s insight here is much in line with Shepherd and Yeo’s distinction between informational and evidential values of records mentioned earlier. To Terry Eastwood, the core idea of accountability is responsibility and the notion that freedom of the will makes people answerable for their actions to a higher institutional – or societal – authority.⁵² He argues that accountability is closely associated with the concepts of transparency and responsiveness – especially for organizations in the public sphere, like broadcasters. Transparency is the degree to which the actions of an organization are open and accessible to the public. Responsiveness refers to the degree to which the performance of actions serves the interest of those the organization is accountable to. Responsibility in this sense extends to rendering account for the results achieved.⁵³

Eastwood distinguishes three stages of accountability served by records.⁵⁴ The first stage, *organizational accountability* is foremost an internal matter and takes place solely in the current records environment. Employees use records to report their actions and give account of how obligations were fulfilled to superiors in the chain of delegation. Organizational accountability ends

⁴⁹ Richard Pearce-Moses, *A Glossary of Archival and Records Terminology*, (Chicago: Society of American Archivists, 2005): 5.

⁵⁰ Jane Parkinson, “Accountability in Archival Science,” (Master of Archival Studies Thesis, University of British Columbia, 1993): 12.

⁵¹ *Ibid.*, 32.

⁵² Terry Eastwood, “Archives, Democratic Accountability and Truth,” in *Better off Forgetting? Essays on Archives, Public Policy, and Collective Memory*, ed. Mona Holmlund and Cheryl Avery (Toronto: University of Toronto Press, 2010):143-168.

⁵³ *Ibid.*, 146.

⁵⁴ Terry Eastwood, “Should Creating Agencies Keep Electronic Records Indefinitely?” *Archives and Manuscripts* 24:2 (1996): 264-265.

with records passing from custody of the creating agency to the archives. In the second stage, *public accountability*, records fulfil the duty of an organization to give account to the public for any decisions made. It is in this stage that transparency and responsiveness are of most importance. Public accountability is served by records, regardless of their state of activity. The final stage is *historical accountability*. Here inactive records serve the needs of society to remember its accomplishments and failures, with “each age accounting for itself to its successors, if you like.”⁵⁵ In a way, Eastwood’s three stages of accountability echo the three purposes of records (business, accountability, and cultural) voiced by Shepherd and Yeo, with each of the stages/purposes progressively dealing with the internal, societal and historical sphere, respectively.

In practice, organizations mainly concern themselves with organizational and public accountability. Regarding public accountability, Parkinson remarks that all organizations “acting in the public sphere are, in effect, acting with delegated public authority and are therefore accountable [to the public].”⁵⁶ Public broadcasters in the Netherlands need to justify their actions to both the government, which provides the greater part of their funding, and to the public, whom they are tasked to represent in their programming. Article 2.143 of the Dutch Media Act reads: “The NPO and the public media institutions fulfil the public service media directive independently and in order to do so, are entitled to funding from the State that enables high-quality programming and guarantees financial continuity.”⁵⁷ In other words, with this article the Dutch government delegates the responsibility for high-quality public service broadcasting to the NPO and media institutions (i.e. the broadcasters). As the higher authority that has delegated the tasks to the broadcasters, the government has both the right and the interest to know what has been done to fulfil this commitment as well as the duty to assess any actions taken. In order to do so, the NPO is charged by law to form an independent accreditation committee that evaluates the ways in which the NPO and the broadcasters – both individually and collectively – satisfy the public service directive and represent the interests of the public.⁵⁸ The Dutch Media Authority is responsible for upholding the rules of the Media Act and inspecting the spending of government funding. As such, the broadcasters and the NPO are accountable to the Media Authority directly, as is laid down in article 2.171.⁵⁹ Furthermore, to enable the Media Authority to perform its tasks, the broadcasters are legally required to “keep their administration in such a state that the Media Authority can access desirable information in an unambiguous and consistent state.”⁶⁰ This article could be interpreted as a directive to keep a proper

⁵⁵ Eastwood, “Should Creating Agencies”, 265.

⁵⁶ Parkinson, “Accountability in Archival Science”, 80.

⁵⁷ Media Act 2008, section 2.143, paragraph 1. [Translation by the author]

⁵⁸ Media Act 2008, section 2.186, paragraph 1.

⁵⁹ Media Act 2008, section 2.171.

⁶⁰ Media Act 2008, section 2.178, paragraph 1. [Translation by the author]

recordkeeping system to support accountability, for “those who are accountable for their actions are responsible for ensuring that the evidence needed to discharge their obligations is preserved.”⁶¹

In a way accountability for broadcasters is a two-sided affair. As explained above, the broadcasters are publicly accountable, which in practice is accountability towards the government, which after all acts as representative of the public or embodiment of society, if you will. At the same time the broadcasters have a significant role in holding the government itself accountable to the public. Serving the public interests with independent journalistic values, broadcasting serves as an important means through which governmental transparency and responsiveness is displayed to and judged by the public. The next paragraph will study the cultural value of public broadcasting in more detail.

3.4 Cultural value of public broadcasting

As the brief history of public broadcasting in the Netherlands in the previous chapter showed, the Dutch broadcasters were installed as the voices of the pillars of society. However, with depillarization ongoing in later years, their position became less self-evident. Under constant threat of governmental budget cuts and potential competition of commercial parties, the broadcasters have been in a regular struggle to legitimize their existence. Since commercial broadcasting inevitably entered the Dutch media landscape in the early nineties, the market share of public television dropped to less than a third of all viewers. This exodus of viewers has brought public broadcasting in heavy weather in recent years, forcing it to justify their added value in society. What is the cultural value of public broadcasting today and why is it worth preserving?

The intended cultural value of public broadcasting is primarily described by the government in the public service media directive. The directive as it is laid down in the Media Act states:

“Public media institutions meet democratic, social and cultural needs of Dutch society by providing programmes that are well-balanced, pluralistic, varied, and of high quality, and that are characterized by a great diversity in form and content. (...) [Programmes] that reflect the convictions, opinions and interests of the people within the societal, cultural and ideological spheres.”⁶²

Public broadcasting would have cultural value in their tasks of supporting and stimulating democratic citizenship, social coherence, trustworthiness, and the expression of critical and independent

⁶¹ Parkinson, “Accountability in Archival Science”, 97.

⁶² Media Act 2008, section 2.1. [Translation by the author]

opinions.⁶³ Looking at its own mission statement, the NPO sees public broadcasting as the “oxygen for a democratic, open and heterogeneous society.”⁶⁴ Public broadcasting offers an open space for information, debate, expression and relaxation, free of economic or political pressure. As such, it is the cornerstone of a democratic society. In other words, public broadcasting is “not owned by the state, commercial businesses, or the producers, but it’s of, for and by the people.”⁶⁵ Pretty much all (political and academic) reports perused for the purposes of this thesis describe the role of public broadcasting along the same lines: objective, trustworthy, upright, pluralistic, independent, and contributing to social cohesion.⁶⁶

But why would it be a bad thing to leave broadcasting to commercial parties? According to former State Secretary Van der Laan, independence, pluralism, accessibility and quality would no longer be self-evident when public service would be traded in for the commercial drive to make profits. Forcing non-public, commercial parties to upkeep high standards and cultural values through laws or decrees would restrict entrepreneurial freedom, and this would be undesirable in a liberal society.⁶⁷ The Labour Party (PvdA) voiced a concern for a chasm in society between “those who are in the commercial ‘media-setting’ and who are, according to research, less involved in current events in society and those who stay loyal to the public broadcasters.”⁶⁸ It is what the PvdA calls the ‘Faust-dilemma’: should public broadcasters sell their soul to the devil and how far should they be allowed to go in their strive to keep viewers bound to their networks?⁶⁹ Media scholar Vincent Crone calls for television to be used as *Enlightener* in order to contribute to the societal values that form the basis of people’s wellbeing. “These values are too important for Dutch society to be left to commercial broadcasters who won’t guarantee their upholding, which could eventually threaten the cohesion of

⁶³ WRR, *Focus op Functies. Uitdagingen voor een toekomstbestendig mediabeleid*, (Wetenschappelijke Amsterdam: Amsterdam University Press, 2005): 11.

⁶⁴ NPO, *Verbinden, Verrijken, Verrassen. Concessiebeleidsplan 2010-2016*, (Houten: ZuidamUithof, 2010): 13. [Translation by the author]

⁶⁵ *Ibid.*, 13. [Translation by the author]

⁶⁶ *De Publieke Omroep verdient beter. Een toekomstplan van de PVDA*, (Amsterdam: Wiardi Beckman Stichting, 2005); WRR, *Focus op Functies; Met het oog op morgen. De publieke omroep na 2008. Kabinetsvisie op de toekomst van de publieke omroep*, (Den Haag: Ministerie van Onderwijs, Cultuur en Wetenschap(pen), 2005); Paul Rutten, Andra Leurdijk, Valerie Frissen, *Out of Focus. Een analyse van het WRR rapport over de toekomst van de media* (TNO, 2005); *Afstemmen op het publiek. De maatschappelijke verankering van de publieke omroep*, (Wetenschappelijk Instituut voor het CDA, 2004); Paul Rutten, *Omzien naar de omroep. Rapport van de visitatiecommissie landelijke publieke omroep*, (Hilversum: Nederlandse Publieke Omroep, 2004); Broeders and Verhoeven, “Kiezen uit overvloed. Sociaal-culturele ontwikkelingen in vraag en aanbod in het medialandschap,” in *Trends in het medialandschap. Vier verkenningen*, ed. Van der Donk, Broeders and Hoefnagels, (Amsterdam: Amsterdam University Press, 2005); WRR, *De Publieke Omroep voorbij. De nieuwe rol van de overheid in het publieke mediabeleid*, (Amsterdam: Amsterdam University Press, 2005).

⁶⁷ *Met het oog op morgen*, 8.

⁶⁸ *De Publieke Omroep verdient beter*, 9. [Translation by the author]

⁶⁹ *Ibid.*

the community.”⁷⁰ If legitimacy of the Dutch public broadcasting system is pressured because of decreasing viewership, how can a society then be enlightened through public service broadcasting if half the population quits watching? Although this dilemma has remained unsolved so far, the discourse that legitimizes and gives cultural value to public broadcasting still remains intact.

The public broadcasters are grounded in the middle of society and give a voice to individuals, groups and social organizations. They function as an intermediary and a media partner to the public and serve pluralism and representation in the media. In the Dutch system, each public broadcaster is by definition backed by hundreds of thousands members, contributors, friends and/or supporters. As such they embody a large portion of the population. Seen from this perspective, Dutch public broadcasting is foremost a democratic system, not unlike a democratic political system. Public broadcasting should be seen as national heritage in the sense that it not just offers programmes produced according to desired cultural values and high standards, but it does so while representing and reflecting all layers of society.

⁷⁰ Vincent Crone, *De Kwetsbare Kijker: een Culturele Geschiedenis van Televisie in Nederland*, (Amsterdam: Vossiuspers UvA, 2007): 223. [Translation by the author]

IV. Functions of Dutch public broadcasting

The previous chapter assessed the reasons for record keeping in general, and the arguments for keeping broadcasting records in particular. Taking this into consideration, the next question would be what kind of broadcasting records are created in the organizations that are part of the Dutch public broadcasting system. In order to answer this question, it should be established what actions these organizations perform to fulfil their purposes and tasks. An effective way to achieve a full understanding of an institution is to analyse its functions. Building on Margaret Cross Norton's famous aphorism "records follow functions"⁷¹, which means that records not only relate to and support business functions but are also created as an outcome and a means of those functions, the functional approach is considered the method that allows placing the records in their context and is used by archivists to gain an in-depth understanding of the activities that take place within their organizations.

In this thesis, the functional approach is used to identify the purposes and main goals of the broadcasting organizations in their different mandates. It is, however, not the author's intention to conduct a full functional analysis of the broadcasting organizations. The functions (and relevant underlying activities) are analyzed on a macro-level only. The broadcasting functions that are established in this chapter are the starting point for the analysis of the archival practices conducted at the case study organizations and to find out which kinds of broadcasting records are actually kept.

As Foscarini has pointed out,⁷² functional analysis is a complex approach, not in the least because of the confusing use of dissimilar, sometimes ambiguous, definitions of functional terms. This chapter will therefore start with the theoretical grounding of the concept of functional analysis, before identifying the specific functions of broadcasting agencies. The chapter will end with the legal framework for the archiving of broadcasting records, by discussing the relevant work of the Public Records Act and the Dutch so-called PIVOT macro-appraisal project.

⁷¹ T.W. Mitchell, ed., *Norton on archives: the writings of Margaret Cross Norton on archival & records management*, (Chicago: Society of American Archivists, 2003): 110.

⁷² Fiorella Foscarini, "Understanding Functions: an Organizational Culture Perspective," *Records Management Journal* 22:1 (2012): 20-36.

4.1 Functional Analysis

Establishing which records exist in an organization starts with understanding the context in which records are created. The primary focus should therefore be not on what the records are about or how the organization is structured, but rather on what the records *do* and what the organization *does*. Rather than establishing the subject of documents, archivists identify the *functions* the agency performs or is responsible for. Among other purposes, a functional context provides the background information archivists need in order to formulate selection and retention policies. By establishing the core functions and learning where those functions are being performed and by whom, the archivist can determine what documentation is needed and locate (or encourage the creation of) the corresponding records. The process of investigating an organization's functions is called *functional analysis*. Functional analysis promotes greater understanding of the purposes for which records are created. It reveals common patterns and aims to broaden a sense of the activities and actors that must be documented to achieve a full understanding of the organization.⁷³

The basis for functional analysis as it is known and used today was laid down sixty years ago by T.R. Schellenberg in his influential book *Modern Archives: Principles and Techniques* (1956). In this book, Schellenberg provides a first attempt at functional analysis by introducing a function-based classification scheme (see figure 4.1). This hierarchical model of respectively functions, activities and transactions (the 'F-A-T' model) is still used as a framework for the functional approach today. Functional analysis is a top-down approach. The analysis starts at the highest level, with the most general view of the system. From there, it works its way down, decomposing the system down into a hierarchy of smaller, more specific components. Each lower level consists of components that together achieve the objectives of the higher-level part. This approach helps to understand how things progress in an organization.

For Schellenberg, classification starts at the function level: "records, as a rule, should be classified according to function. They are the result of function; they are used in relation to function; they should therefore be classified according to function."⁷⁴ Schellenberg defines *functions* as "all the responsibilities assigned to an agency to accomplish the broad purposes for which it was established."⁷⁵ In this definition, he thus recognizes a link between functions and the overall purpose of an organization. More recent definitions of the term are semantically different, but very similar in their substance. The Society of American Archivists (2005), for instance, gives a formalized version of Schellenberg's definition: "the activities of an organization or individual performed to accomplish

73 Helen W. Samuels, "Improving Our Disposition: Documentation Strategy," *Archivaria* 33 (1991-1992): 131-133.

74 T.R. Schellenberg, *Modern Archives. Principles & Techniques*, (Chicago: Society of American Archivists, 2003): 62-63.

⁷⁵ *Ibid.*, 54.

some mandate or mission.”⁷⁶ In addition, Shepherd & Yeo (2003) point out that new functions may arise – or existing functions may disappear – when aims and objectives change, but these are usually rare occurrences.⁷⁷ In these newer definitions still, like with Schellenberg, functions are connected to an organization’s purposes.

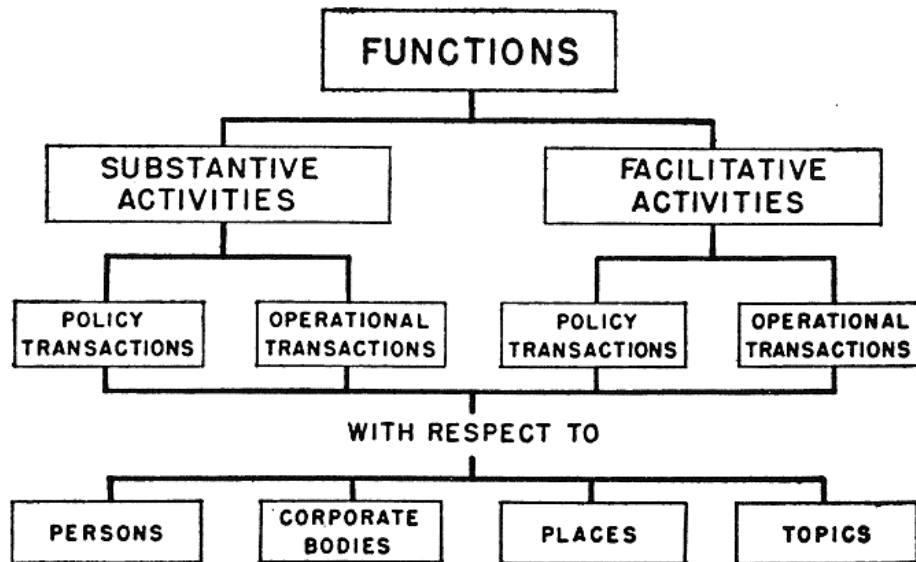


Fig 4.1. Schellenberg’s function-based classification scheme.⁷⁸

The next level in the model is that of *activities*. According to Schellenberg, an activity is “a class of actions that are taken in accomplishing a specific function.”⁷⁹ Shepherd & Yeo add two elements to this definition: activities have a definable outcome and they are time-limited. An activity thus has a definable beginning and end, although the end point may not always be known when the activity has begun. Despite being time-limited, most organizational activities have a broadly repetitive nature and will recur many times: they are instances of a process.⁸⁰ Schellenberg’s classification scheme breaks down the identified functions into two types of activities: *substantive* and *facilitative*. *Substantive activities* are those that relate to the technical or operational work of the organization or agency, or, in other words: “work that distinguishes it from all other agencies.”⁸¹ *Facilitative activities* relate to the internal management of the organization and are common to all agencies, such as housekeeping activities. “These are merely incidental to the performance of the agency’s basic

⁷⁶ Pearce-Moses, *Glossary*, 179-180.

⁷⁷ Shepherd & Yeo, *Managing Records*, 51.

⁷⁸ Schellenberg, *Modern Archives*, 55.

⁷⁹ *Ibid.*, 54.

⁸⁰ Shepherd & Yeo, *Managing Records*, 52-53.

⁸¹ Schellenberg, *Modern Archives*, 54.

functions.”⁸² Making the distinction between substantive and facilitative records is essential when establishing the value of records for purposes of appraisal and selection.⁸³

On the third and final level of the model, activities – whether substantive or facilitative – are broken down into *transactions*. Again, Schellenberg distinguishes two types of transactions: *policy* and *operational* transactions. *Policy transactions* involve decision-making processes whose outcome usually manifests itself in a new policy or in changes to existing policies. These transactions may refer to an entire organization or only one part of it, and may apply to facilitative as well as to substantive activities. *Operational transactions* are those that derive specifically from policy decisions. They materialize in case files that represent the practical implementation of existing policies. All kinds of transactions can relate to persons, corporate bodies, places, or topics.⁸⁴

As discussed in the previous chapter, records are made or received in the transaction of business. Essentially, they are information about an organization or a person’s activities, and not about subjects or end products. Records are the outcome and the means of the fulfilment of functions. “Understanding functions is therefore essential to grasp the meaning of both the records and the *context* of records’ creation and use,” Foscarini explains in the *Encyclopedia of Archival Science*.⁸⁵ The centrality of organizational functions is justified by the nature of the records as by-products of processes. Records should be understood in the context of their functions. Analysing functions instead of administrative or organizational structures has the advantage of providing a stable framework. While organizations are often subject to restructuring and reorganizations, functions usually stay the same, regardless the position in the organization where they are fulfilled. In the words of David Bearman and Richard Lytle:

"It is probably more important to relate the records to a particular function than it is to relate them to an organizational component because there may be no relationship between the organization and the function. Functions are independent of organizational structures, more closely related to the significance of documentation than organizational structures, and both finite in number and linguistically simple"⁸⁶

⁸² Schellenberg, *Modern Archives*, 54.

⁸³ Shepherd & Yeo actually also recognize substantive and facilitative functions, thus making the distinction on a higher level than Schellenberg did. For Shepherd & Yeo, substantive functions are related directly to the organization’s purpose, while facilitative functions provide the infrastructure that enables the substantive functions to proceed (Shepherd & Yeo, *Managing Records*, 51.)

⁸⁴ Schellenberg, *Modern Archives*, 54.

⁸⁵ Fiorella Foscarini, “Function,” in *Encyclopedia of Archival Science*, ed. Luciana Duranti and Patricia C. Franks (Lanham: Rowman & Littlefield, 2015): 215.

⁸⁶ D. Bearman and R.H. Lytle, “The Power of the Principle of Provenance,” *Archivaria* 21 (1985-86): 22.

Whatever the structure of an organization, the nature of its records will be established in the overall purpose of the organization. An organization can be perceived as a system of interacting processes which work together towards a common purpose.

Functional analysis is still an underdeveloped concept in its theoretical and methodological implications.⁸⁷ It is, however, a useful model to understand records in their context and to provide a general framework to help evaluate an organization's records. Applying functional analysis at the institutional level is essential to understanding the nature of an organization and its corresponding activities in their context. Furthermore, by analyzing the functions, it becomes possible to compare several closely related organizations, as is the case for broadcasting organizations. Even if the practical implementation of records management is different for each broadcaster individually, their overall purposes – and therefore their functions – are identical, or at least comparable. By analyzing the functions of one broadcaster, the results can be generalized to the other broadcasters as well. This helps identifying the kind of broadcasting records that are created within the public broadcasting system as a whole.

4.2 Functions of public broadcasting

As said before, functions are the responsibilities that are assigned to the organization to accomplish its main purposes. In order to establish an organization's functions, these main purposes must be determined. In other words, functions can be derived from an organization's mandate and/or mission statement. In the case of the organizations in the Dutch public broadcasting system, their mandate is explicitly laid down in the Media Act 2008. On top of that, the eight broadcasters together also published the so-called Public Media Accords: a document that states their shared aims and agreements.⁸⁸ These Accords are an addition to the policy plans that each broadcaster individually handed in to the Ministry of Education, Culture and Science for the period 2016-2020.

Analysis of both the Media Act and the Public Media Accords has lead to the identification of the functions of broadcasting as described below. These functions were established within this thesis in order to facilitate the identification of the broadcasting records that are actually kept at the studied organizations. This final analysis is conducted in chapter V. Since the purposes differ drastically for the types of organizations that together form the Dutch public broadcasting system, they are addressed separately. It is important to note that the listing of functions is intended to be as

⁸⁷ Sherry Xie, "Functional Analysis," in *Encyclopedia of Archival Science*, ed. Luciana Duranti and Patricia C. Franks (Lanham: Rowman & Littlefield, 2015): 221.

⁸⁸ Gezamenlijke Publieke Omroepen, "Publiek Media Akkoord 2016-2020," (Agreement letter, Hilversum, 31-1-2014).

comprehensive as possible to include the most important purposes of broadcasting, but it might not be completely exhaustive. The list's main purpose is to give an understanding of the workings of the organizations in the broadcasting system and to give a basis for identifying gaps between records that are archived and those that are created but not kept, for whichever reasons.

Functions of the broadcasters⁸⁹

1. Programming and commissioning of programmes

covers all processes that lead to the decisions which programmes are to be aired. Each broadcaster decides what kind of programmes it wants to air during its appointed hours based on its own identity, aims and background. This function is substantive.

2. Providing of programmes

covers all activities that have to do with the production and airing of television and radio shows. In other words: all activities that have to do with the creation of broadcasting content. This includes the production and airing of programmes that were made within the own organization, as well as commissioned programmes that are developed by third parties. This function is substantive.

3. Connecting to society

includes all activities that deal with reaching the public and keeping ties with supporters. In the Dutch system, broadcasters have a vast backing of members, subscribers, sponsors and friends. Furthermore, the broadcasters need to represent a certain societal, cultural or religious movement in Dutch society. This function also includes activities concerning TV/radio guides. This function is substantive.

4. Cooperation & participation in the broadcasting system

covers the activities that concern collaboration of the broadcasters among each other and with the NPO. The broadcasters also aim to actively participate in the discussion and decision-making processes about the policies concerning the public broadcasting system as a whole. This function is substantive.

⁸⁹ The functions of the broadcasters are derived from paragraphs 2.34 and 2.55 from the Media Act 2008, combined with the Public Media Accords 2016-2020.

5. Sustain the organization

covers those areas, including governance, financial and personnel management, and premises that are required to assure the continuity of the organization. This function is facilitative.

Functions of the NPO⁹⁰

1. Promoting cohesion and cooperation among broadcasters

covers all activities concerning the collaborations of the individual broadcasters. The NPO stimulates the broadcasters to work together towards common goals in the fulfilment of the public service media directive. This function is substantive.

2. Representing shared interests of broadcasters

covers all activities concerning the NPO as representative of the joint public broadcasters. The NPO acts on behalf of the broadcasters in matters that are of common interest, but also on the international market or in the case of collective labour agreements for broadcasting employees. This function is substantive.

3. (daily) coordination of air time and scheduling

includes all activities regarding distribution of air time and coordination of scheduling. The NPO appoints the amount of airtime for each broadcaster and regulates which type of programmes is to be aired on each network or station at what time. This function is substantive.

4. Distributing of public funding to broadcasters

covers all activities concerning the allocation of government funding towards the public broadcasting organizations. This function is substantive.

5. Facilitation of broadcasting

includes all activities concerning the sustainment, management, exploitation and regulation of facilities and services that are needed for broadcasting (i.e. studios and distribution infrastructures). This function is substantive.

⁹⁰ The functions of the NPO are derived from paragraphs 2.2.1 and 2.2.5 from the Media Act 2008.

6. Sustain the organization

covers those areas, including governance, financial and personnel management, and premises that are required to assure the continuity of the organization. This function is facilitative.

4.3 Legal framework: the Public Records Act and PIVOT

Before continuing the analysis of which records are kept in practice, it is needed to address the legal framework within which the archiving of broadcasting records is conducted. Appraisal in accordance with the Public Records Act is the dominant factor in deciding which broadcasting records are archived and which are destroyed. The Public Records Act is legislation to protect public records and is applicable to government administrative bodies and ZBO's. This paragraph will give context to the decisions made by the people responsible for archiving in the public broadcasting system, the NPO in particular.

Each government body is responsible for its records from the time of creation until they are either destroyed or transferred to the National Archives. The Public Records Act 1995 dictates that each body applies retention schedules and/or disposition plans. Retention schedules enable an organization to dispose of records that are no longer needed. All retention schedules (in Dutch: basis selectie document or BSD) must be approved by the appropriate stakeholders, which in the Netherlands is done in a formal procedure called "triangular consultation" (in Dutch: driehoeksoverleg). At least three people are involved in this consultation: an external expert in the organization and tasks of the government agency concerned, a practicing records manager in the agency concerned, and the state archivist. Once a retention schedule is accepted by the triangular consultation, it is validated by the Minister after an eight week reviewing period for the public. After a retention schedule is validated, compliance by the organization is mandatory.

The retention schedules and disposition plans that are drawn up in accordance with the Public Records Act 1995 are based on a macro-appraisal method introduced by the Dutch PIVOT project.⁹¹ Initiated by the National Archives, PIVOT was introduced in the nineties and was aimed at dealing with the backlog in appraisal and transfer in order to reduce the volume of government records of

⁹¹ PIVOT is an acronym for Project to Implement the New Transfer Period. See also: Agnes Jonker, "Macroappraisal in the Netherlands. The First Ten Years 1991-2001, and Beyond," *Archival Science* 5 (2005): 203-2018.

long-term value. The only way to deal with the massive amount of government records was to develop a new appraisal method that moved away from the former time-consuming approach focussing on the records themselves. At the core, the PIVOT method is a functional approach that supports functions as the principal object of appraisal. It is concerned on a macro level with the context of creation of records, instead of the records' relationship to the creator. To determine which records should be kept, an institutional research is conducted of the domain at hand – past and present – that results in a report describing the functions related to the agency and the 'products' (types of records) that are created. Simply put, the institutional research results in the function-based retention and disposition schedules. The description of functions contains the following elements⁹²:

<i>Function (handling)</i>	A collection of activities by an actor aimed to fulfil a mandatory task.
<i>Actor</i>	Entities that create, use and accumulate the records.
<i>Statute</i>	The statutory base of the function, including dates and revisions.
<i>Period of time</i>	The period in which the function is or has been carried out.
<i>Product</i>	PIVOT's method states the product (or "function output") instead of the transactions or records.
<i>Annotation</i>	(optional)

The PIVOT method is only concerned with the context of the creation of records. The overall aim of the method is to appraise policy-making and executive functions and it thus focuses on identifying records that provide *evidence* of legislation, decisions, operational tasks and that evaluate policies and the interaction between government and society. The *informational* value of records (that is, an assessment of the records' content) is not taken into account. The ultimate goal of the appraisal of government records under the PIVOT method is stated as: to safeguard the most important documents of Dutch society and culture for permanent retention. Retention of these records must enable the reconstruction of both government actions and important historical-societal events in the future. To reach this goal, six general selection criteria are recognized⁹³:

⁹² Jonker, "Macroappraisal in the Netherlands," 208-209.

⁹³ Ibid., 211.

1. Functions concerning the preliminary undertaking, development and resolution of policy making, including the preparation of legislation and regulations.
2. Functions concerning the evaluation of a policy.
3. Functions concerning accountability to the appropriate regulatory authority.
4. Functions concerning (re)organization of government agencies.
5. Functions administering operational tasks
6. Functions administering operational tasks in exceptional circumstances or events.⁹⁴

The macro-appraisal method PIVOT introduced in the Netherlands is an example of a functional approach in practice. The method, however, is not without criticism. Some critics, for instance point out a gap between the level of description of functions in a retention schedule on the one hand, and the daily business processes on the other. However, most criticism is directed at the lack of attention to the informational value of records. PIVOT is mainly concerned with the evidential value of policy records, while operational records are to be destroyed according to other appraisal criteria.

The retention and disposition schedules for the NPO and the Commissariaat are drafted within the legal framework described above. Using case studies, the next chapter will analyze the archival practices at the organizations of the public broadcasting system in more detail and will focus on any gaps between records created and selected for permanent retention.

⁹⁴ e.g. abolition of the competence or power of the government, martial law, state of war, flood, or other disaster.

V. Recordkeeping in the Dutch public broadcasting system

The previous chapters addressed reasons for keeping broadcasting records and established the purposes and functions that ideally should be archived in the two types of organizations examined. The following chapter dives into the archival practices at the organizations themselves. Which records are actually kept, and what kind of policies are in place to ensure records are archived? The Dutch public broadcasting system involves too many organizations to allow giving an in-depth overview of the archival situation for each of them within the frame of this thesis. To get an understanding of the recordkeeping practices at public broadcasting, interviews and document analyses were two case studies are conducted at two organizations, the NPO and the VPRO. Being the central, governing body within the public broadcasting system, the NPO will be studied to explore how archiving is implemented at organizations that fall under the Public Records Act. The VPRO acts as the case for the broadcasters that are independent from government interference in the matter of archiving. Founded in 1926, the VPRO has always been one of the smaller broadcasters among the long-established broadcasting organizations. In the recent shake up of the public broadcasting system, the VPRO chose to remain on its own and not to merge with some other broadcaster, unlike the bigger broadcasters did.⁹⁵

The findings reported in the following pages are primarily based on data collected through interviews with key employees in the archive divisions at the NPO and VPRO conducted in June and July 2016, respectively. The interviews had an informal and conversational character and were based on open-ended questions. On behalf of the VPRO the responsible radio and television archivist were interviewed. Both of them are responsible for drafting and carrying out the archival policies concerning radio and television records, respectively. The third interviewee is the senior archivist at the Central Archives of the NPO and is tasked with drafting and carrying out the archival policies, including appraisal and the processing of the records.

⁹⁵ However, the VPRO does work closely together with aspiring broadcaster HUMAN, which could very well end up in a merger somewhere down the road.

5.1 Recordkeeping at broadcasting organizations

Broadcasting generates great quantities of production records, both ancillary documentation to the programmes and research information. Broadcasters have to retain much of these operational records for legal reasons, for instance to protect their copyright or as evidence of the licensed third party music or clips that were used in production. Furthermore, keeping production records would benefit future sales or reuse of the programming. Production records can be voluminous if all records documenting the preparation of a broadcast are kept. Apart from the production records, broadcasting organizations of course have their management archives as well, containing administrative records on policies, regulations, personnel, finances, etc. Ideally, the archival appraisal of the broadcasters' administrative and operational records should resemble that of other public corporations. However, as Ernest J. Dick has stated: "broadcasting is a post-literate medium in which much of the creative thinking and debate are not expressed in writing."⁹⁶ As such, operational records of broadcasting may not always reflect the day-to-day decision-making that programming entails. As was mentioned before, the ephemeral nature of broadcasting contributes to its non-archival character.⁹⁷

Records at the VPRO are not managed by one central agency. Instead, individual departments or units take care of their own records. Most of the VPRO records fall under one of three main archives: the management archive, radio archive and television archive. Each of these has its own archivists, who have but limited knowledge of each other's dealings.

VPRO management archive

The management archives contain the records of the board of directors, administration and the chief editors. The records in this archive are also concerned with governance of the organization, physical plant, personnel and the VPRO as a member-association. For more than a decade, the management of this archive was outsourced to colleagues at the archiving division of the VARA, one of the broadcasting organizations with whom the VPRO shares its building. In accordance with previous scheduling strategies the VPRO and VARA shared the airtime on television channel Nederland 3 as well. In order to save overhead costs, the broadcasters decided to share several facilitative departments, with the management archives being one of them. However, with new scheduling policies of the NPO, the broadcasters no longer have a fixed home channel and the need for close collaboration faded. After the VARA transferred their written archives to a heritage institution and let go of their former archivist two years ago, the VPRO took their management archives back, placing

⁹⁶ Dick, "An Archival Acquisition Strategy," 265.

⁹⁷ Ibid., 254.

them under the responsibility of the newly appointed Head General Affairs.⁹⁸ However, an elaborate archival policy including selection criteria for the management archives has still to be drafted.

VPRO radio archive

The VPRO started its radio archive only in 2004, when the necessity of tending to the VPRO radio legacy was recognized. The current radio archive is assembled out of several aggregates of records that were stored in various locations at the VPRO. Records in the radio archives date back to 1926, when the VPRO was founded as a radio broadcaster. However, before 2004 there were no proper archival policies for records, therefore the historical archive is full of gaps and omissions. With the new focus on archiving, a serious attempt is being made to save historical radio records and to make sure future records are kept proactively. The main purposes of the radio archive are stated in an internal memo and show an awareness of the cultural-historical value of the records.⁹⁹ It is recognized that the broadcasts are produced with public funding, which brings forward a moral obligation to keep records as part of the national cultural heritage. Furthermore, apart from being “key to the history of the VPRO”, the radio archive enables reuse of (parts of) broadcasts on the radio or online.¹⁰⁰

The radio archive is predominantly focused on acquisition and digitization of the recordings of radio broadcasts. Of secondary concern are the ancillary and production records. These operational records contain research materials, records about the preparations of broadcasts (cue sheets, scripts, texts, etc.), programme data and logbooks. Operational records for finished radio programmes should in principle be transferred to the radio archive. However, many records still reside on the work floor, waiting to be processed. According to one interviewee, producers of long running radio shows prefer to hold on to their old records instead of giving them to the archive.

Programme data and logbooks are of special interest to the radio archive because they help enable access to the audio recordings. Logbooks and scripts are especially important when the corresponding broadcast was not recorded, or has been lost. Logbooks have been kept since the very beginning of the VPRO’s radio broadcasts, but in the course of time many log records were lost. The VPRO has been using digital logbooks since approximately 1987, although access to the old systems is problematic nowadays and logbooks were not always used properly (or at all) by producers. Today, all programme data and logbooks are stored in a central management system, which is connected with the systems used at the Netherlands Institute for Sound and Vision (Beeld en Geluid), the

⁹⁸ VPRO, “Een toekomstbestendig Radioarchief voor de VPRO,” (internal memo, 2013), 17.

⁹⁹ VPRO, “Een toekomstbestendig Radioarchief voor de VPRO,” (internal memo, 2013).

¹⁰⁰ *Ibid.*, 1.

heritage organization that archives all audiovisual broadcasts for Dutch public broadcasting (see chapter VI).

Although the radio archive imposed a collection policy on the VPRO's radio department, this policy does not include any specific selection criteria. At present it seems the radio archivist simply tries to retain as many of the operating records as she can get in order to minimise further losses. Unfortunately, not all producers are acquainted with the archival policies, which is painfully exemplified by the unwelcome destruction of the records of long running show *De Avonden* (1995-2013) after it was discontinued in 2013.

VPRO television archive

The archival policy that is in effect for the VPRO's television departments is more elaborate and strict than the one for the radio archive.¹⁰¹ All television production records, both on paper and digital, are transferred to the archive after the show's run has ended and all records are appraised before they are added to the archive. A straightforward set of selection criteria ensures that the lion's share of the records are deselected and destroyed. The following criteria were used for the appraisal and processing of historical television records.

Essential records:

- logbook records
- programme data, cue sheets, etc.
- copyright records
- licences of used clips and music
- (on screen) text and layout materials (i.e. credits, subtitles, etc.)

Preferred records:

- in-depth research and documentation
- interesting and relevant correspondence
- viewer responses and user generated content
- minutes of editor meetings and records concerning preparations of the show
- audience ratings and reception
- screenplays and scripts
- call sheets for festivals

¹⁰¹ The author was only provided a printout with selected pages from a 2013 internal policy document of which the title is unknown.

Records selected for destruction:

- superficial research and documentation
- (copies of) invoices and debit notes¹⁰²
- production correspondence
- transcripts

Looking at the selection criteria – particularly for the essential records – the main purposes of the television archive is apparent: the records are primarily kept for accountability, reuse and (international) sales. However, the archival policy document also stresses the historical importance of the production records.

It goes without saying that nowadays most production records are digital and the amount of records has tremendously increased. Most current paper records have to do with finances, which are managed by the financial department and are not selected for the television archives. To help appraise and classify the digital records, producers and editors working on television shows are urged to use a uniform folder structure on the central data server. This folder structure reflects priorities as they are identified in the selection criteria, thus helping the archivist to assess the records without much effort. The central data server is backed up regularly by the ICT department, ensuring records are not lost. The workflow for digital records ensures the transferring and appraisal of production records on the central server only. Data on personal hard drives is not included. However, the archivist interviewed for this study estimates not many records are stored locally that are not copied or relocated to the shared folders. Bigger concerns are for relevant e-mail correspondence and texts uploaded to internet pages, both are not covered in the current archival workflows.

The archival policy for the television archive seems to be adequate and well thought-out, but this is only partially the case for the radio and management archives. Furthermore, other departments (most notably HRM, finances and communications) manage their own archives almost independently. The lack of uniform policies and of a centralized archive results in a VPRO archive which is de facto scattered throughout the entire organization. The Public Records Act – if it were in effect here – would require the VPRO archives to be in a well-organized, orderly and accessible state – which at present is not the case. However, from a cultural-historical perspective, much effort is spent on safeguarding the production history of the television and radio programmes and the broadcasting organization as a whole.

¹⁰² The financial department manages its own records in accordance with the appropriate laws and regulations.

Looking back at the functions of broadcasting as they were laid down in chapter IV, the VPRO does a proper job in taking care of the records of most of such functions. The radio and television archives cover the *providing of programmes* function, by selecting production records that document the activities that have to do with the creation of broadcasting content. Even though the absence of selection criteria makes it difficult to assess this in detail, the management archive seems to include records of the functions *programming and commissioning* (through the records and minutes of the chief editors), *sustain the organization and cooperation in the broadcasting system* (as reflected in the records of the board of directors and administration) and *connecting to society* (by means of the records concerning the VPRO and its members). The latter function is also tended to by the archive of the TV/radio guides, of which ten copies of each issue are kept. From a cultural-historical perspective, it could very well be that the absence of formal selection criteria has a positive effect on the amount and type of records that are retained within the management archive. As is the case for the NPO, the selection criteria stemming from the PIVOT method, which focus on specific policy records and exclude many other types of records from permanent retention, would not result in a broader selection of records for the VPRO.

5.2 Recordkeeping at the NPO

In contrast to the situation at the broadcasting organizations, recordkeeping at the NPO is completely centralized and managed within a Central Archives division. This division exists since 1961 within the NTS, but after the NTS and NRU merged into the NOS in 1969, the NRU archives (since 1947) were also added to the Central Archives. Nowadays, the Central Archives sustains the document management system, provides the selection criteria and coordinates department heads in managing the archives of their individual departments. The division answers directly to the board of directors, which issues several regulations to guide the archive processes within the entire organization. This strict recordkeeping setup stems from the obligation of the NPO to comply with the Public Records Act of 1995. As a ZBO, the NPO is required to keep their records in a well-organized, orderly and accessible state. This means the records must be complete, relevant and reliable, while access should be possible with minimal effort.¹⁰³ In order to maintain the archive in such a state, the Central Archives provides the organization with a document management system, an elaborate filing system, and a retention schedule with selection criteria.¹⁰⁴

¹⁰³ NPO, "Archiefbeheersregels NPO," (internal policy document, 20-01-2016), 2.

¹⁰⁴ Ibid., 4.

All original records that are designated for retention should be registered or archived in the document management system. Employees in the several departments are responsible for adding their own records. To prevent records from getting lost, the ICT department makes regular back-ups of the data and operating system of the document management system. This procedure provides for a daily, monthly and yearly full back-up. In order to safeguard accessibility of the records, the ICT department needs to anticipate the ongoing technological developments by assessing when conversion or migration of the data is required. If such actions are needed, the procedures and specifications of the conversion are documented to warrant authenticity of the records.

As a ZBO, the NPO applies selection criteria to appraise their records that are laid down in a formal retention schedule that was approved within a triangular consultation in 2011.¹⁰⁵ The retention schedule is created in accordance with the PIVOT method described in chapter IV, meaning that the six general selection criteria identified in the PIVOT document are the basis for the NPO's appraisal as well. The records in the NPO archives must thus enable the reconstruction of the NPO's actions and must make its policies and decisions comprehensible. The retention schedule lists three primary purposes of the NPO that need to be documented in accordance with the Public Records Act¹⁰⁶:

- Promoting cooperation and cohesion among national broadcasters.
- Distributing the budget between the national broadcasters.
- Providing and scheduling air time to all national broadcasters.

Based on the selection criteria, six functions of the NPO are identified of which the records are eligible for appraisal under the Public Records Act.¹⁰⁷ Table 5.1 on the next page shows these functions in relation to the NPO's purpose each of them was derived from. All records belonging to these functions are to be selected for permanent retention in the archives, except for records concerning daily coordination (5). Those records are disposed of in accordance with the retention schedule.

After the NPO's retention schedule was approved by the triangular consultation in 2011, the Central Archives has started appraising and processing the NPO's historical records accordingly. In 2014, the selected archives from the NPO's predecessors (1947-2001), with a total volume of 66.40 meters, were transferred to the National Archives. However, these archives only include the records that the NPO was obliged to maintain legally. The records only cover the broad outlines of the preparation,

¹⁰⁵ "Selectielijst voor de neerslag van handelingen van de Nederlandse Publieke Omroep (NPO) en voorlopers over de periode vanaf 1969." *Staatscourant nr. 7817* (2011).

¹⁰⁶ "Selectielijst NPO", 10. [Translation by the author]

¹⁰⁷ *Ibid.*, 19-21. [Translation by the author]

establishing and evaluation of policies and strategies concerning the above-mentioned purposes of the organization. Although the appraisal process followed the PIVOT method perfectly, a large amount of records was left out. Records regarding other functions of the NPO's predecessors still remained with the Central Archives.

#	Function	Purpose
1	Preparation of and giving advice on policies, and establishing regulations needed for implementation of the NPO's tasks, including at least regulation on scheduling and coordination of the national broadcasting networks.	Cooperation and cohesion
2	Production of periodic reports to accomplish public accountability.	
3	Distribution of funding to broadcasting organizations.	Budget
4	Preparation and implementation of coordination for broadcasting of programmes from the broadcasting organizations on radio, television or the internet.	Scheduling and air time
5	Daily coordination of the national radio stations and television channels.	
6	Scheduling of the national radio stations and television channels.	

Table 5.1. Functions of the NPO, as stated in the retention schedule.

Although formally there was no need to retain the remaining archives and many of the records would have to be destroyed anyway, the NPO archivists were hesitant to destroy the those records entirely without a second assessment. Instead, the left-over records from the 1947-2001 era were appraised in a second round. Free from any formally defined criteria, a secondary set of selection criteria was put together by the Central Archives:¹⁰⁸

- Records concerning affairs or events of unique or special character for the NPO and/or its predecessors.
- Records concerning affairs in extraordinary times.
- Records that in form or (previous) purpose were defining or characteristic for the NPO and/or its predecessors.
- Records that summarize events or processes, like annual reports, overviews or official statistics.
- Records concerning individuals that are or have been of special interest to the organization.
- Records that can replace other records that should have been retained, but were lost in one way or another.

¹⁰⁸ NPO, "Plan van Aanpak archief 1947-2001 wat niet is overgedragen aan het Nationaal Archief," (internal memo, July 2014).

- Records concerning individual affairs that have led to general regulations.
- Records that, when destroyed, would compromise the logical context of records that are to be retained.

Records that did not meet these secondary criteria were officially destroyed, in accordance with the Public Records Act. Records that were now selected were either processed for permanent retention within the Central Archives, or offered for acquisition to third party heritage institutions. A large portion was transferred to the National Archives to be added to other 1947-2001 archives. With this second round of appraisal coming to an end, the Central Archives has now started appraising records from the final period of the NPO's predecessor NOS (2002-2009).

When comparing the six functions of the NPO that were established in chapter IV with the functions mentioned in the retention schedule, it would seem that not all the NPO's functions are covered when it comes to appraising relevant records. The three purposes mentioned in the retention schedule seem only to encompass the functions *promoting cohesion and cooperation among broadcasters*, *coordination of air time and scheduling* and *distributing of public funding to broadcasters*. However, the first retention-function is very broad and reads "establishing regulations needed for implementation of the NPO's tasks," which would cover *shared interests of broadcasters* as well and basically includes the NPO's records concerned with governance of the organization (part of the function *sustain the organization*). Main gaps between the records that are created and those that are kept permanently seem to be in the areas of personnel management and premises (both from the function *sustain the organization*) on the one hand, and facilitation of broadcasting on the other. The retention schedule focuses mainly on policy records, whilst overlooking operational records – or nominates them for destruction, as is the case with operational records concerning the daily coordination of the national radio stations and television channels. Nevertheless, the procedure where the NPO appraises records that were selected for destruction under the formal retention schedule is an interesting addition to PIVOT. Where the PIVOT criteria are directed at policies and decision-making, this secondary list includes culturally-historically valuable records as well. While PIVOT is a macro-appraisal method only, this NPO procedure also takes the informational value of individual records into account and thus resolves the main concern many critics had about the PIVOT method. This two-step appraisal procedure ensures that the NPO records are not kept for business purposes and accountability only, but likewise for cultural purposes.

The NPO is not alone in its search for third parties that may be interested in their archives that are not meant to be transferred to the National Archives. Several broadcasting organizations are also looking for a heritage institution that may want to acquire their historical records. For instance, the

VARA archives were brought to the International Institute of Social History (IISG). Presently, broadcasting records end up at many different institutions, making it difficult for future users and researchers to track down the records they are interested in. The next chapter will look into the changing collection policies at the Netherlands Institute for Sound and Vision, a heritage institution that may be seen as a logical place where broadcasting records could be housed so as to be all in one single place.

VI. Broadcasting records at the Netherlands Institute for Sound and Vision?

As the previous chapter has shown, broadcasting records are mainly archived either if there is a legal obligation to do so, or if the records can be reused within the organization. In the case where broadcasting records are kept based on awareness of their cultural-historical value alone, however, it is more accurate to describe the archiving actions taken as ‘not destroying’ rather than ‘preserving’ (accessibility is yet another issue). Archiving at the broadcasters is often a challenge because of lack of (financial) means, facilities and expertise. Transferring records to a heritage institution would be the best solution to avoid the loss of culturally-historically valuable broadcasting records. However, only a handful of broadcasting organizations have done so. The broadcasting archives that had so far been transferred ended up at institutions focused on the history of specific pillars in Dutch society. For instance, KRO records are at the *Catholic Documentation Centre* in Nijmegen, while the NCRV management archives ended up at the *Documentation Centre for Dutch Protestantism* at the Vrije Universiteit Amsterdam. However, most broadcasting archives still reside at the creating agency. There is no organization in the Netherlands that is specifically targeting broadcasting records systematically. If the need for such an organization did arise, a logical place would be the *Nederlands Instituut voor Beeld en Geluid* (Netherlands Institute for Sound and Vision), the repository for media productions. Until very recently, Beeld en Geluid had been focussing mostly on audiovisual assets: the end-product of broadcasting. Following the acquisition of the archives of two important organizations in the broadcasting system, the collection policy is in the process of being changed to include written archives¹⁰⁹ in the future as well. This chapter will look into Beeld en Geluid and the development of new selection criteria for written records. Which role could Beeld en Geluid take in the issue of safeguarding the cultural-historical value of broadcasting records? The findings reported in the following pages are based on data collected through a meeting with the senior policy advisor for Beeld en Geluid in June 2016. The interview was conducted in similar fashion to the case studies, meaning it had a conversational character and was based on open-ended questions.

¹⁰⁹ Please note that in this thesis, the terms ‘written archives’ or ‘written records’ are understood as text-based archives/records, in the sense that it is non-audiovisual material. Photographs are excluded from this ‘written records’ category in this thesis, even though one could argue that photographs are written with light. In other words, this thesis makes the distinction between written (i.e. text-based documents) and audiovisual records (i.e. videos, sound recordings, photographs, etc.). ‘Written records’ includes both records on paper, as well as digital-born textual records.

6.1 Changing selection policies for broadcasting records

The Nederlands Instituut voor Beeld en Geluid was founded in the nineties in order to save the Dutch national audiovisual heritage, which at the time was in acute danger of becoming obsolete. Beeld en Geluid was the result of the merger of four organizations with diverse backgrounds in media production, commissioning, research and broadcasting.¹¹⁰ The institute is aimed at all Dutch audiovisual heritage in general, but one of its main purposes is being the national repository for Dutch public broadcasting.¹¹¹ Like the broadcasting organizations, Beeld en Geluid receives public funding in order to execute this mandate. Also like the broadcasters, Beeld en Geluid is an organization under private law and not a ZBO. Because of the pressing necessity to save audiovisual materials in particular, it is no surprise that Beeld en Geluid is fully equipped to handle film and audio records, which it has been doing successfully for the previous two decades. All efforts and activities were directed at the acquisition, selection, digitizing and making accessible of audiovisual archive material. Written records were collected only as source of complementary context information to the films and broadcasts; in the best case as secondary interest after the AV-materials, but in many cases of no real interest at all. It is striking that in the most recently published Collection Policy (2013), a sixty page document in total, the policy regarding written records is addresses on the last page, in a mere 180 words only.¹¹²

Up until today, Beeld en Geluid has not invested in a sufficient infrastructure to handle written documents (be it on paper or digital born). Archives, library materials and documentation are not disposed of, but nothing is done to make them accessible either. Nevertheless Beeld en Geluid holds an estimate of three kilometres of written archives. This collection mainly consists of personal papers of important figures in Dutch media history; daily log reports for broadcasting; radio/television guides; radio play scenarios; technical manuals for broadcasting equipment and television/radio sets; and production files including contracts and licences. The latter consists mostly of context information to the corresponding audiovisual materials and these files are of auxiliary nature primarily. Throughout the years, Beeld en Geluid knew a passive acquisition policy and most of the written records in its possession are the legacy archives of predecessors.

Beeld en Geluid is an audiovisual heritage institution first and from that capacity it is understandable that its attention is completely on the end-products of broadcasting. For a good understanding of the

¹¹⁰ Piet van Wijk, "Een kwestie van kiezen. Acquisitie en selectie van de nationale audiovisuele collectie," *Tijdschrift voor Mediageschiedenis* 2 (2000): 7-34.

¹¹¹ Media Act 2008, section 2.138a.

¹¹² Mieke Lauwers, ed., *Collectiebeleid Beeld en Geluid*, (Hilversum: Nederlands Instituut voor Beeld en Geluid, 2013): 60.

broadcasts, however, the context in which they were produced is of importance just the same. Furthermore, Beeld en Geluid also presents itself as a knowledge institute for Dutch media and broadcasting history. Accepting written broadcasting records would meet this goal as well. Luckily, adjustments are being made to the collection policies to make acquisition of more written archives possible in the near future.¹¹³ The new Beeld en Geluid policy will not only provide selection criteria to help acquire said archives, but would also upgrade many written archives from context collection to core collection, meaning the non-AV archives will henceforth have the same status as the audiovisual collections and function as independent sources for knowledge about the Dutch media history and culture. This change follows the steady increase in archives that are offered to Beeld en Geluid. With broadcasting coming of age, more and more personal files of former broadcasting employees and company archives of media institutions are up for transfer to a heritage institution that is interested. The enormous recent budget cuts mentioned in chapter II cause the reorganizations, relocations and mergers of broadcasters, whom in the process are looking to get rid of their non-current archives. However, the main trigger that set the changing of policy in motion is the current acquisition of the company archives of two major organizations in the broadcasting system: the *Mediafonds* (Media Fund) and the *Radio Nederland Wereldomroep* (Radio Netherlands Worldwide, RNW).

The Mediafonds is an organization that promoted the development and production of high-quality artistic programmes by the national (and regional) public broadcasting organizations. Since 1988, it provided subsidies for radio- and television programmes in the fields of drama, documentary, feature film, youth, new media and performing arts. In 2016, the total amount of subsidies provided was 16 million Euros. Like the NPO, the Mediafonds was a ZBO and these subsidies were funded by the government. The difference between the NPO and the Mediafonds is that the NPO finances the broadcasters on an organizational level, while the Mediafonds provided public funding for individual programmes. Unfortunately, the Mediafonds was one of the victims of the budget cuts in the broadcasting field: as of January 1st 2017, the organization will cease to exist. Many of its current functions will be taken over by other agencies. Arrangements for the termination of the organization are being wrapped up as this thesis is written. Naturally, one of the main concerns is the Mediafonds archives, of which a large portion will be transferred to the custody of Beeld en Geluid.

Another victim of government cut backs in recent years is the RNW. Founded in 1947, RNW was the Dutch international broadcaster, providing radio programming directed at the overseas territories (Indonesia, Suriname and the Dutch Antilles) and Dutch expats all over the world. RNW was also

¹¹³ Mieke Lauwers, "Selectiebeleid papieren collecties Beeld en Geluid," (internal memo Januari 2016).

directed at an international audience, by promoting Dutch culture and providing reliable news and current affairs to people in countries where free speech and independent journalism is limited. RNW used to have a similar status as the NOS and NTR, but after major cutbacks in 2013, the RNW was forced to reorganize drastically. RNW is now no longer funded through the Media Budget, like other broadcasters, but by the Ministry of Foreign Affairs. Taking after the Mediafonds, the RNW company archives from before the restructuring will be acquired by Beeld en Geluid. Before this can be done, new selection criteria are being established.

6.2 Selecting selection criteria for broadcasting records

The new collection policy is being broadened to also encompass written records. However, it would not be feasible – or necessary – to acquire complete company records without some sort of selection process to help decide which records to keep and which ones to destroy. A general set of selection criteria is supposed to help to build a comprehensible representation of the position of the concerned organization within the media sphere and the role it played in the realization of media productions. The new criteria Beeld en Geluid uses for the acquisition of written archives concentrates on two main themes:¹¹⁴

- i. Records about the *history of the organization*. Selected for retention are records concerning the founding and dissolution of the institution, those concerning major organizational changes in between and records about important changes in policy development. Publications and materials used for promotional purposes are also selected for retention.
- ii. Any records that *relate to the media productions*. This covers records that are used in all stages of media production: preparation, development, actual production, broadcasting, promotion and reception. Not all production records are retained though. A selection must be made of programmes that are exemplary for the broadcaster: programmes that are highlights or those that in any other way are significant in the history of the concerning organization. The selection pursues a reasonable coverage of programmes on different platforms and of different genres. An exception is made for production contracts and copyright documents; these are all selected for retention, since they contain potentially important information on the reuse of the assets in the audiovisual archives.

These general selection criteria are the basis for a gross list of selected records. To come to this actual selection, Beeld en Geluid has put together a so-called '*comité des sages*' (committee of the

¹¹⁴ Lauwers, "Selectiebeleid papieren collecties," 2.

wise).¹¹⁵ This group consists of persons from within the concerned organization with the (historical) knowledge and expertise, and external media (history) experts, but also includes individuals from the archival community. With this setup, the comité des sages actually reflects the triangular consultation that approves the governmental retention and disposition schedules (see paragraph 4.3). The comité des sages composes the list of records and files that cover the crucial historical moments and most significant productions of the broadcaster, which Beeld en Geluid then uses for the actual appraisal of the broadcasting archives.

This strategy with a comité des sages was first tested out during the acquisition of the Mediafonds archives. Because the Mediafonds was a ZBO, they had to comply with the Public Records Act in the same way as the NPO and Commissariaat. In accordance with the law, all records regarding policies and decision-making (i.e. the administrative records) were transferred to the National Archives. The production records did not fall under the criteria of the retention schedule¹¹⁶, and were presented to Beeld en Geluid for selection, where the audiovisual productions that were subsidised by the Mediafonds were already retained. The first comité des sages was charged with selecting the productions that reflect the unique tasks and character of the Mediafonds. Since this pilot case was satisfactory, the same setup was used when the RNW archives were up for selection. Contrary to the Mediafonds, the RNW has no dealings with the Public Records Act and thus the new comité des sages has a wider assignment: to make a selection for both production and administrative records. In this process, the selection criteria in the Mediafonds retention schedule were used as starting point.

The acquisition of the RNW and Mediafonds archives are good test cases for new selection policies for written broadcasting records at Beeld en Geluid. These cases deliver practical and comprehensive selection criteria that could be of use in the acquisition of other public broadcasting archives. However, if these positive outcomes and new criteria will result in an active acquisition policy still remains to be seen. Selection is only the start for preserving broadcasting records. Proper handling and care, digitization, description and provision of access to the archives are important just as well, and, more importantly, require substantial financial means. Also when Beeld en Geluid decides it wants to acquire more broadcasting archives, funding is an important issue. In the cases of the Mediafonds and RNW, the Ministry of Education, Culture and Science is expected to provide incidental funding. However, an active acquisition policy would require a more structural financial base. Another issue is the expertise for handling paper records. Beeld en Geluid as an institution is an

¹¹⁵ Lauwers, "Selectiebeleid papieren collecties," 1.

¹¹⁶ E.A.F. van Druten, "Basisselectiedocument (BSD) Stimuleringsfonds Nederlandse Culturele Mediaproducties. Selectielijst voor de neerslag van de handelingen van de zorgdrager Stimuleringsfonds Nederlandse Culturele Mediaproducties en rechtsvoorgangers op het beleidsterrein van media, letteren en bibliotheken over de periode vanaf 1988," *Staatscourant* nr. 15599 (19 oktober 2009).

expert in preserving audiovisual materials; managing paper archives would require large investments in knowledge, facilities and personnel. If Beeld en Geluid would start acquiring broadcasting records actively in the near future, it should consider looking for partners in the circles of traditional archives. By looking for collaborations in the archiving sector, Beeld en Geluid could acquire broadcasting records that are relevant to its collection and traditional archival expertise, while delegating the physical management of the archives to, for instance, the National Archives. This way, cultural-historical valuable broadcasting records could still be kept safe for future use, research and accountability.

VII. Conclusions

The issue of archiving the Dutch public broadcasting system has become more pressing in recent years. With workflows turning digital, broadcasting organizations are looking at ways to dispose of their voluminous paper archives. At the same time the broadcasters are maturing and have started to recognize the cultural-historical value of their archives. The public broadcasting system saw major changes in recent years: the (forced) merger or dissolution of several broadcasters and the new central position of the NPO, to name a few. These organizational changes make it apparent that broadcasting archives serve purposes that extend beyond those of each organization as such. Organizations within the public broadcasting system play an important role in society, politics and the cultural field. Attending to public broadcasting records serves a general cultural-historical interest, not just the business purposes of the creating agency. Organizations at all levels of the public broadcasting system receive most of their funding from the government. Likewise, the basis for their mandates and concessions to act within the public broadcasting domain stems from the Media Act. This implies that the broadcasting organizations should be accountable for their actions. Paradoxically, the Public Records Act does not apply to the broadcasters. This thesis studied the archival practices in the public broadcasting system to assess the accountability of the broadcasters from a cultural-historical perspective. Are broadcasting records kept properly, even in the absence of any legal obligations to archive? By comparing case studies, the archival practices of one broadcasting organization have been placed next to the situation at the NPO, which does have to comply with the Public Records Act.

There are three reasons for organizations to create, keep and use records. Records are used for business purposes, to support accountability and/or for cultural purposes. Looking at the public broadcasting system, these three reasons apply to each type of organization differently. Although broadcasters do feel a moral obligation to keep records out of cultural-historical awareness, the main reason for them to keep their records is the reuse potential. (Parts of) television programmes or radio shows can be repeated, reused or sold to other broadcasters. For the NPO, accountability is the main reason for recordkeeping. In line with the Public Records Act, the formal retention schedule is aimed at records that could be used to reconstruct the agency's actions and decision-making. In other words, the legal obligation to keep records is foremost aimed at accountability towards the government. In the case of the broadcasting system, this would mean that the accountability of the broadcasters is indirectly ensured by the archival practices of the NPO and the Dutch Media Authority. After all, the broadcasters are accountable towards the NPO in order to be eligible for

funding, and also the rightful spending is monitored by the Dutch Media Authority. As ZBO, both organizations are required to keep the records of these functions.

Looking back at the functions of public broadcasting as they were established in this thesis, it is remarkable that the selection criteria in the formal retention schedule of the NPO are very narrowly focussed, thus excluding records that, in contrast, do cover functions of the organization that are derived from its legal mandate. From a cultural-historical perspective especially, the selection criteria stemming from the PIVOT method appear too narrow. Luckily, the NPO overcomes this limitation by introducing a second round of appraisal with a second set of selection criteria. In other words, having to comply with the Public Records Act is both a blessing and a curse. On the one hand, the selection criteria are only focused on policies, while ignoring operational records and leaving out many culturally valuable records. On the other hand, a legal archiving obligation ensures that the organization is deliberately and purposefully engaged in recordkeeping, ideally with elaborate archival policies. This second argument seems to imply that it would be a good idea to include the broadcasting organizations in the Public Records Act. However, it is remarkable how well records have been kept at the VPRO, even without an archival obligation. Surely there are omissions and many records have been lost over time. Yet unhindered by formal selection criteria, many culturally-historically valuable records that would otherwise be selected for destruction have been retained.

In practice, archiving at the broadcasters for the most part entails storing and enabling recovering only. Sustainable preservation or digitization is not something that is actively pursued by the broadcasters themselves. Obviously, this is foremost a financial issue. The same goes for the NPO, although their records are ensured of preservation after they are transferred to the National Archives. To ensure sustainable preservation and access, broadcasting records would best be served if they were transferred to a heritage institute like Beeld en Geluid. Until recently, Beeld en Geluid only played a minor role in the acquisition of written broadcasting records. Several broadcasters prefer to transfer their historical archives to other heritage institutes that have an interest in the material because of their background in Dutch societal pillarization. However, now that society has depillarized and broadcasters from former competing pillars have merged, the need for central broadcasting-oriented repository arises. Considering that Beeld en Geluid already is the repository for the audiovisual products of Dutch public broadcasting, it would seem logical for the institute to broaden their collection policies to include written records as well. However, to ensure long term preservation of and access to this type of records, Beeld en Geluid needs to invest in the knowledge and facilities to properly deal with paper archives. Collaboration with the National Archives could prove to be sensible in this matter. In such a collaboration, Beeld en Geluid would acquire the archives of and facilitate access to the (digitized) records, while the management of the physical

records would be delegated to the skilled staff of the National Archives. In any case, a central repository at a single heritage institute where the broadcasting organizations could transfer their records to would be the best way to secure the culturally-historically valuable broadcasting records into the future.

Further research

This thesis offers a general overview of the archival practices in the Dutch public broadcasting system. However, because of the limited scope and timeframe that was available for this research, only the situation at the NPO and the VPRO could be examined in-depth. Although a functional approach was chosen to be able to generalize the outcomes of the case studies, further research would have to be conducted into the archival procedures at other broadcasting organizations and the Dutch Media Authority, in order to validate these findings. In addition, it would be interesting to dive further into the historical broadcasting archives that have been transferred to other heritage institution and research the relationship between broadcasting and pillarization from an archival perspective. Lastly, placing the Dutch situation in an international perspective, it would be interesting to compare the Dutch archival practices to those at public broadcasting organizations abroad. With its background in a pillarized society, Dutch public broadcasting is a fairly unique system and probably very different from, for instance, the BBC in the UK. Moreover, it would be very interesting to compare archival practices of the Dutch public broadcasting with countries where public broadcasting is state controlled or censored.

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Archiving the Airwaves

Accountability of the Dutch Public Broadcasting System

Jasper Snoeren