

**BROADCASTING STANDARDS AUTHORITY**  
**STATEMENT OF INTENT**  
**2017 - 2021**


**TE MANA WHANONGA KAIPĀHO**  
**TAUĀKĪ WHAKAMAUNGA ATU**  
**2017-2021**



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# STATEMENT FROM THE BOARD

23 May 2017

This Statement of Intent (SOI) sets out what the Broadcasting Standards Authority (BSA) intends to achieve or contribute to over the next four years and how it will manage its functions and operations to meet its intentions. This SOI is produced in accordance with section 141 of the Crown Entities Act 2004.

The broadcasting environment continues to be one of dynamic change, with the media environment evolving rapidly. At the time of preparing this SOI, the Government has announced plans to update the Broadcasting Act 1989 (the Act), to better reflect the converged media environment. The proposed changes include extending the Act, and the BSA's functions, to capture certain on-demand content (excluding news and current affairs programmes and user-generated content) to ensure it meets classification and content standards. While the reform process is underway, and we are contributing to it, the reforms are not yet in force and we continue to operate under the regulatory structures set up in 1989. Accordingly, we are charged with working with the current structures to be as effective as we can.

Our focus therefore over the next four years is to ensure that the current system works well – both at BSA level and at broadcaster level – with a view to improvements underpinning any future regulatory system. We will also be ready to adapt to the reforms once these are in place. Central to this, our decisions must continue to be robust and clear and we must work well with co-regulators of content in New Zealand. A key focus is to work with broadcasters and the public to ensure they are aware of and understand how the standards apply and how the complaints process works.

**Peter Radich** ONZM *Chair*

**Leigh Pearson** *Member*

**Te Raumawhitu Kupenga** *Member*

**Paula Rose** QSO *Member*

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# STRATEGIC OVERVIEW

# 2017–2021

## VISION

Fairness and freedom in broadcasting

## PURPOSE

Our purpose is to oversee New Zealand's broadcasting standards regime so that it is fair to all New Zealanders, by balancing the broadcasters' right to freedom of expression with their obligation to avoid harm to individuals and society.

## OVERARCHING OUTCOME

New Zealanders have increased confidence that the broadcasting standards regime fairly balances the broadcasters' right to freedom of expression with their obligation to avoid harm.



# STRATEGIC FRAMEWORK

<b>SECTOR VISION</b>	<b>New Zealanders’ distinctive culture enriches our lives</b>
<b>BSA VISION &amp; PURPOSE</b>	<p><b>↑ OUR VISION IS FOR FAIRNESS AND FREEDOM IN BROADCASTING ↑</b></p> <p>Our purpose is to oversee New Zealand’s broadcasting standards regime so that it is fair to all New Zealanders by balancing the broadcasters’ right to freedom of expression with their obligation to avoid harm</p>
<b>OVERARCHING OUTCOME/GOAL</b>	<p><b>↑ What we intend to achieve: ↑</b></p> <p>New Zealanders have increased confidence that the broadcasting standards regime fairly balances the broadcasters’ right to freedom of expression with their obligation to avoid harm</p>
<b>IMPACTS OVER TIME</b>	<p><b>↑ How we contribute and influence: ↑</b></p> <p>We will actively engage with and educate all broadcasters and the public about broadcasting standards, so that:</p> <ul style="list-style-type: none"> <li>• broadcasters and the public are aware of and understand the broadcasting standards that apply</li> <li>• the public understands how to complain</li> <li>• broadcasters meet their obligations under the broadcasting standards</li> <li>• the system is developed with input from broadcasters and the public</li> <li>• standards are relevant to the media environment to which they apply</li> </ul> <p>We will issue decisions on complaints that are fair, clear, robust and timely, and reflect our changing media environment</p>
<b>MEASURE OUR IMPACT</b>	<p><b>↑ How we know we are succeeding: ↑</b></p> <ul style="list-style-type: none"> <li>• Public awareness of the existence of the broadcasting standards system is maintained</li> <li>• Understanding of standards by broadcasters and the public is improved</li> <li>• A high level of trust and confidence in the system is maintained</li> <li>• There is a reduction in the number of upheld and not upheld complaints</li> </ul>
<b>ACTIVITIES &amp; SERVICES</b>	<p><b>↑ How we deliver: ↑</b></p> <pre> graph LR     A["<b>OVERSIGHT AND DEVELOPMENT OF THE BROADCASTING STANDARDS SYSTEM</b> We oversee the broadcasting standards regime, work with broadcasters and others to set clear broadcasting standards, and work to improve the complaint handling system at all levels by addressing systemic issues, reviewing codes, issuing guidance and undertaking research"] --&gt; B["<b>COMPLAINTS DETERMINATION</b> We receive complaints about breaches of the Codes of Broadcasting Practice and aim to issue robust, soundly reasoned, timely decisions that reflect the boundaries between freedom of expression and harm"]     B --&gt; C["<b>INFORMATION AND COMMUNICATION</b> We provide clear, user-friendly information about the broadcasting standards system and our decisions"]     C --&gt; A   </pre>

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## 1

# OUR PURPOSE

New Zealand is a modern democratic society. A robust broadcast media plays a vital role in our vibrant democracy. We all have a strong interest in protecting this cornerstone. But sometimes, through the exercise of the important democratic right to freedom of expression, the media can harm individuals and society. A balance needs to be struck between broadcasters' right to impart ideas and information and the public's right to receive that information, and the harm that exercising this right may cause. This is where the BSA sits as it regulates the balance between freedom of expression and harm to New Zealand society in the broadcasting environment.

This right to freedom of expression is a fundamental right in our society. It is embodied in the New Zealand Bill of Rights Act 1990. The right belongs to the media and to individuals. But it is not unlimited. Freedom of expression may be limited where that is reasonable, prescribed by law and justified in our free and democratic society. As a regulator, the BSA is charged with determining whether there ought to be limits placed on the broadcasters' right to freedom of expression. In undertaking that role, the BSA asks whether the benefits of freedom of expression in each case outweigh any harm that may be caused. The BSA also recognises that restricting free speech can be harmful in itself. This means that the threshold for upholding a complaint is high.

When undertaking all our work, whether developing and promoting the standards or determining complaints, we must balance these two concepts justly. We must ensure that broadcasters' right to freedom of expression is supported whilst also ensuring that they fulfil their obligations under the broadcasting codes to avoid harm. Through this we aim to promote a broadcasting standards regime that is fair to all New Zealanders and is a system in which we can all have confidence.

## 2

# WHO WE ARE

The BSA is a quasi-judicial tribunal established by the Act, tasked with overseeing New Zealand's broadcasting standards regime, and fulfilling the relevant functions under the Act.

We are jointly funded by government and through broadcaster levies to deliver our services.

We have two primary functions. The first is to provide a free, independent complaints service through which we receive and determine complaints about broadcasting standards. The second is to oversee the development of codes of broadcasting practice, to ensure that broadcasters understand the standards so that they meet their obligations, and to ensure the public are aware of how the code standards apply and how the complaints process operates.

We operate in a co-regulatory environment in which broadcasting standards complaints are the responsibility of broadcasters and the BSA. Generally, viewers and listeners who wish to make a formal complaint about a broadcast must first complain to the broadcaster concerned. Complaints about privacy and election programmes may be made directly to the BSA. If the complainant is dissatisfied with the outcome of the broadcaster's determination they have the right to effectively 'appeal' the matter to the BSA through a referral. Complainants and broadcasters can appeal BSA decisions in the High Court.

The BSA is an Independent Crown Entity. Its work is conducted at 'arm's length' from the government. The government cannot direct or seek to influence the work of the BSA.

Members of the BSA are appointed by the Governor-General on the advice of the Minister responsible for the administration of the Act. Members have two roles: governance of the BSA and quasi-judicial determination of complaints. Members declare potential conflicts of interest and withdraw from consideration of any complaint where they are conflicted. Each member also signs a Declaration of Interest annually.



## 3

## OUR STRATEGIC CONTEXT

### 3.1 Current environment

The media-consuming public has embraced the changing nature of the media environment. This is reflected in changing patterns of consumption, the rapid adoption of a wide range of digital platforms that enables content to be consumed through many devices anywhere, anytime, and the provision of broadcast services in a range of languages reflecting the country's increasingly diverse population.

These changes have rendered aspects of the BSA's governing 1989 legislation out of date. We operate with an outmoded definition of 'broadcasting' that creates increasing difficulties around the scope of our jurisdiction. In response, we continue to work closely with other complaints organisations and content regulators to ensure that public complaints are dealt with efficiently and effectively.

The challenges of the changing content environment have been recognised in the work that is underway to develop the Digital Convergence bill, and the proposal to extend the BSA's remit to cover on-demand online content, excluding news and current affairs and user-generated content. This SOI focuses on our obligations and what we will deliver under the existing legislative structures and mandate conferred on us. When the reforms take effect, we will refresh our SOI to reflect our operating intentions under that new mandate.

On 1 April 2016 we launched the new **Broadcasting Standards in New Zealand Codebook** which brings together the Free-to-Air Television, Radio and Pay Television Codes into one Codebook along with guidance and information for broadcasters and the public.

We continue to operate in a tight fiscal environment. Government expectations are that we continue to review our services as part of a programme of delivery of better public services.

### 3.2 How will we respond to this environment?

Given the legislative status quo, the BSA must work within existing regulatory structures yet in a constantly changing media environment, with awareness that some reform is imminent. We will continue to carry out our statutory responsibilities and remain relevant and responsive, making improvements to the system and structure to ensure that the current system works as effectively as it can. To do this, we must fully understand the areas in which we work and the expectations of the key stakeholders. We will make sure that any improvements could underpin any future regulatory system. In particular, we will:

- Continue to improve the efficiency and effectiveness of our complaints processes and look for innovative ways to deliver our services.
- Continue to deliver fair, clear, robust and timely decisions, and invite independent critique.
- Explore public attitudes to broadcasting standards and use these to inform our decisions.
- Work with broadcasters to keep the new Codebook under review so that it remains relevant and in-step with society attitudes and expectations.
- Ensure we communicate effectively so that the public has easy access to information about the standards regime and how to complain.
- Proactively engage with and educate broadcasters about the standards, so that they are aware of the standards and meet their obligations under the standards.
- Provide advice to officials and fully engage in any reform process during the period, with respect to proposed new regulatory structures from the perspective of our experience and expertise.



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- Manage costs within existing funding streams.
  - Continue shared service arrangements with NZ on Air, maximising the efficiencies of co-location with them (and the Film Commission), and look for other opportunities to work with, or share services with, others in the sector.

### 3.3 Our contribution to the cultural sector

We are part of the cultural sector and contribute to the sector's vision that New Zealand's distinctive culture enriches our lives. In particular, we

contribute to the 'Engage' and 'Excel' outcomes by ensuring that the broadcasting standards regulation system is excellent – accessible, responsive and easily understood – to enable the public to engage and have confidence in broadcast media.

As a regulator, however, we necessarily stand apart from the broader thrust of the cultural sector's outcomes to 'create' and 'preserve' which aim for cultural activity to flourish so that we are unique, distinctive and valued in a globalised world. Our role in the sector, that of keeping the balance between important rights, does, however, enhance New Zealanders' ability to enjoy their broadcasting media and culture.

## 4

# STRATEGIC FRAMEWORK – OUR PERFORMANCE STORY

We have developed a strategic framework to reflect what we intend to achieve (the outcomes we seek), how we contribute to and influence those goals in the medium term, how we measure them, and how we intend to deliver on them through our services and activities.

The framework is set out on page 3 and reflects the interrelationship of our services and activities as part of the system of regulation that we oversee, monitor, develop, make decisions in, and inform people about. It also shows how, together, these contribute to the impacts and outcomes we seek.



## 4.1 What do we intend to achieve?

Our overarching goal (outcome) is that New Zealanders have increased confidence that the broadcasting standards regime fairly balances the broadcasters' right to freedom of expression with their obligation to avoid harm.

The BSA will contribute to and influence this goal by having an impact over time in a number of ways:

### **Active engagement with broadcasters and the public**

Alongside our complaints work, we will actively engage with broadcasters and the public through effective communication and engagement activities to increase awareness about the standards and the complaints system. We will encourage broadcasters to foster a culture where respect for the standards is a core part of their business. We will provide information that enables audiences to respond to broadcasting in an informed way, understand how to make quality complaints to the right place, and have trust and confidence in the robustness of BSA decisions and its processes.

Through this engagement broadcasters will understand and meet the standards and audiences will know how to complain, resulting in fewer unjustified complaints. The BSA will contribute to this impact by working on the development and enhancement of the broadcasting system with broadcasters so that:

- the standards and Codes are robust and relevant to the media environment and reflect New Zealand's diversity
- broadcasters understand and meet their obligations
- broadcasters can resolve complaints earlier and more effectively.

We will keep the standards under review in consultation with broadcasters and the public to ensure they remain relevant to the changing media environment.

### **Issuing decisions that are fair, clear, robust and timely, and reflect our changing media environment**

We will issue high quality decisions that clearly articulate the complainant's concerns and the reasons for our decisions. Through the decisions we will give guidance to broadcasters and the public on broadcasting standards and how they apply in our contemporary New Zealand context.

## 4.2 How will our activities and services contribute to what we intend to achieve?

### 4.2.1 Strengthening the broadcasting standards regime

The broadcast media reaches into the lives of New Zealanders. It informs us and entertains us. Broadcasters have agreed to meet certain standards as they do this. The underlying principles for the standards are prescribed by the Act and the detail, including guidance as to how the standards apply, is set out in the Codes.

The BSA oversees these standards on behalf of New Zealanders in a number of ways. Our key activity is complaints determination but this doesn't occur in a vacuum. We provide two other critical services and activities to support and enhance the broadcasting content regulation system – oversight and development of the broadcasting standards system, and the provision of information about the system and our decisions. We will encourage the development and observance by broadcasters of Codes of Broadcasting Practice by working with broadcasters so that the co-regulatory approach is effective and efficient.

All three parts interrelate, build on, and strengthen the system as a whole. For example, decision making informed by research applies and interprets standards, which in turn informs broadcasters and audiences about how the standards apply and about the balance between freedom of expression and the rights of the media as against the rights and expectations of New Zealanders. Determining this balance, in turn, can impact on audience and broadcaster understanding of the standards.

In this way, all our activities contribute to and/or influence our impact over time: increased understanding and awareness of the standards by broadcasters and the public; broadcasters meeting their obligations under the standards; and a reduction in upheld and not upheld complaints.

### 4.2.2 Our three interrelated activities and services

#### **Complaints determination**

Determination of complaints is the critical point of the regulatory system where we aim to strike the balance between the right to freedom of expression and the responsibility to avoid harm.

We will ensure our decisions are robust and soundly reasoned. We will make the boundaries between the right to freedom of expression and the responsibility to avoid harm increasingly clear through well-articulated decisions. We will ensure that

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our decisions are presented clearly and are easily understood by readers. We will issue our decisions in a timely way and encourage broadcasters to do the same to maintain confidence in the complaints system and the BSA's decision making.

We will continue to assess the clarity, robustness and fairness of our decision making by seeking independent reviews and also by litmus testing our decisions with members of the public.

Our processes for determining complaints are well developed and we will constantly challenge ourselves to refine and improve these systems.

### ***Oversight and development of the broadcasting standards system***

Notwithstanding the reality that the regulatory system is dated and reform is pending, we will continue to adapt our processes, within the boundaries of legislative restraints, to best meet the needs of New Zealanders with a view to any future regulatory system.

The BSA is effectively an appeal body. Broadcasters deal with complaints in the first instance, except where privacy issues or election programmes are involved. This means that the content regulation system depends on their complaints processes working effectively and efficiently to minimise complaint referrals to us.

Our role is to support broadcasters in this area, provide them with information, and improve processes between us. Strong relationships with broadcasters are crucial to performing well. We will continue to have regular contact with representatives of the broadcasters to facilitate these relationships, and to work on system improvements. We will promote greater understanding and awareness of the standards and assist the broadcasters to meet their obligations under the standards.

We will keep the Codebook under regular periodic review to ensure that it remains relevant to the media environment and contains applicable guidance that is developed over time.

We will provide advice to officials on the regulatory environment. We will also commission and publish research that will inform the application and development of broadcasting standards, and ensure that our decision making and policy are informed by diverse contemporary community attitudes and opinions. We will consult with broadcasters and other stakeholders on this research.

We will seek feedback on our service from our stakeholders and we will test public awareness of the standards and the complaints system.

### ***Information and communication***

We will communicate effectively with the public to ensure those who choose to make a complaint understand the standards and how to complain. We will also continue to work with broadcasters to ensure that they provide information to the public about the standards complaints process.

At a minimum, the public needs to be aware that there is a broadcasting standards system, have some idea how to go about finding out how to complain, and know that the BSA exists. There are a number of ways that this occurs – for example, through the broadcasters' responsibility to advertise the complaints procedures (which we audit every two years), through media engagement on our decisions and through use of other communication platforms such as Twitter.

The first point of contact for most of those who want to make a complaint is our website. The website is the critical tool for searching our decisions and helping viewers and listeners understand the broadcasting regime. We will keep our website up to date so it provides clear information to enable New Zealanders to understand their rights, manage their media use within the agreed standards, and make quality complaints.

## **4.3 How do we know that we are having an impact?**

We have identified four key measures to determine our impact over time through our three interrelated activities and services. Many factors will influence the medium-term outcomes and goals, a number of which are outside our control. We cannot achieve these outcomes alone – it will take the involvement and focus of all our stakeholders, which includes broadcasters and the public. These outcomes are also subject to changes in the broadcasting environment generally.

The measures we have chosen are themselves open to different interpretations, particularly our quantitative measures. For example, a reduction in complaints could mean less awareness of the complaints system, or that there is less consumption of traditional broadcasting, or apathy on the part of audiences about complaining. Alternatively, it could mean that the system is working very effectively and only threshold and challenging decisions are reaching us which is the goal we are aiming for.

Notwithstanding their potential ambiguities, we think, taken together, that the following four measures provide a good indication of whether the broadcasting standards system is working as efficiently and effectively as it should.



**Measure 1 – Public awareness that individuals can make a formal complaint about television and radio content is maintained at over 75%**

Every two years we will complete a survey measuring the percentage of New Zealanders aware of the BSA, aware that they can make a formal complaint, and able to find out how to make a formal complaint.

We will also monitor a breakdown of these figures by age, region, ethnicity and gender. The value of measuring public awareness of these elements is that it demonstrates that New Zealanders know they have rights in this area. Any significant decline in awareness would signal that we may need to take steps to raise awareness.

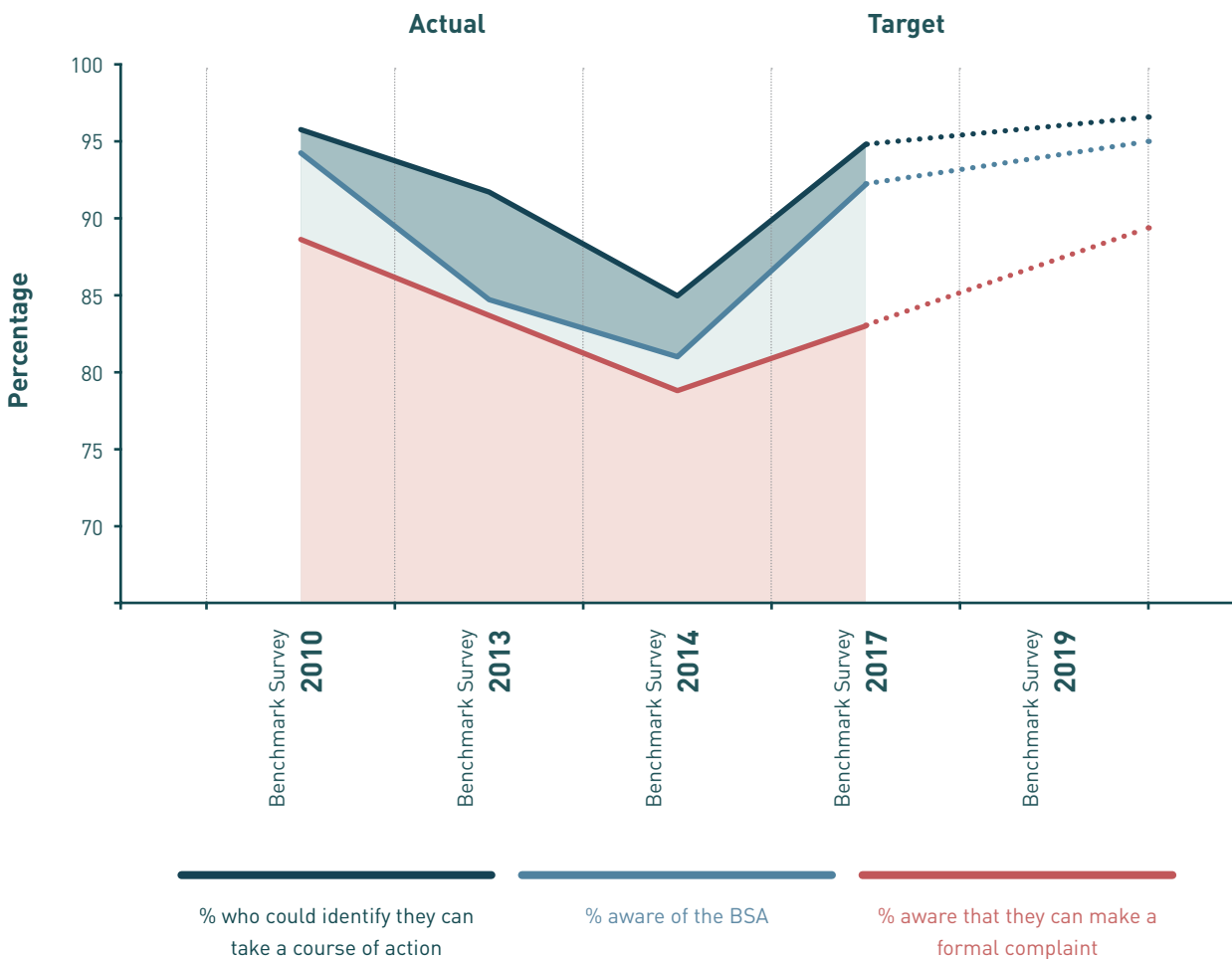
A survey completed in 2014 showed:

- 79% of New Zealanders are aware that they can make a formal complaint about television and radio content
- 85% of New Zealanders could take a course of action which would lead them to finding out about the correct process for making a formal complaint
- 81% of New Zealanders are aware of the BSA.

Over the period 2010-2014 we saw a gradual reduction in awareness levels (see Figure 1 below). This was not surprising given the increasing access to content by New Zealanders through non-broadcast mediums. We consider that, in the context of wider choice of platform for receiving content, an appropriate target is 75% of New Zealanders are aware that they can complain about broadcasting, can find out how to make a formal complaint, and know about the BSA. In response to the gradual decline, we refreshed our communications strategy, with a view to ensuring that we provide information about the standards system and the public's right to complain through a range of channels and in a way that is accessible. This includes through our website, written publications, presentations and press releases that are concise and easy to understand. We also continue to work with broadcasters to ensure that they provide information to the public about the standards complaints system.

In 2017, following implementation of the refreshed communications strategy, the survey results showed a marked improvement in the public awareness results, which are reflected in the graph in Figure 1.

Figure 1 - Public Awareness



Measure 2 – Broadcaster and public understanding of the standards is improved

Where the standards are understood by broadcasters they are better equipped to meet their obligations under the standards and therefore fewer complaints arise. The nature of complaints referred to the BSA will be those that are most complex and challenging. Similarly, there will be a reduction in not upheld and unjustified complaints as the public

understand what content standards relate to; for example, they do not relate to editorial or programming decisions made by broadcasters.

We will test public and broadcaster understanding of the standards through the litmus testing of BSA decisions and through satisfaction surveys of complainants and broadcasters.



### Measure 3 – Trust and confidence in the BSA's decision making and the system is maintained

BSA's decisions can be, and sometimes are, appealed. This is a valuable part of the process as it is important for parties to have recourse to the courts. Valuable jurisprudence is generated through the appeal process. Where the BSA issues robust and soundly reasoned decisions, trust and confidence in the BSA's decision making and the system as a whole will be maintained. This may be illustrated where there is no proportionate increase in the number of BSA decisions overturned by the High Court.

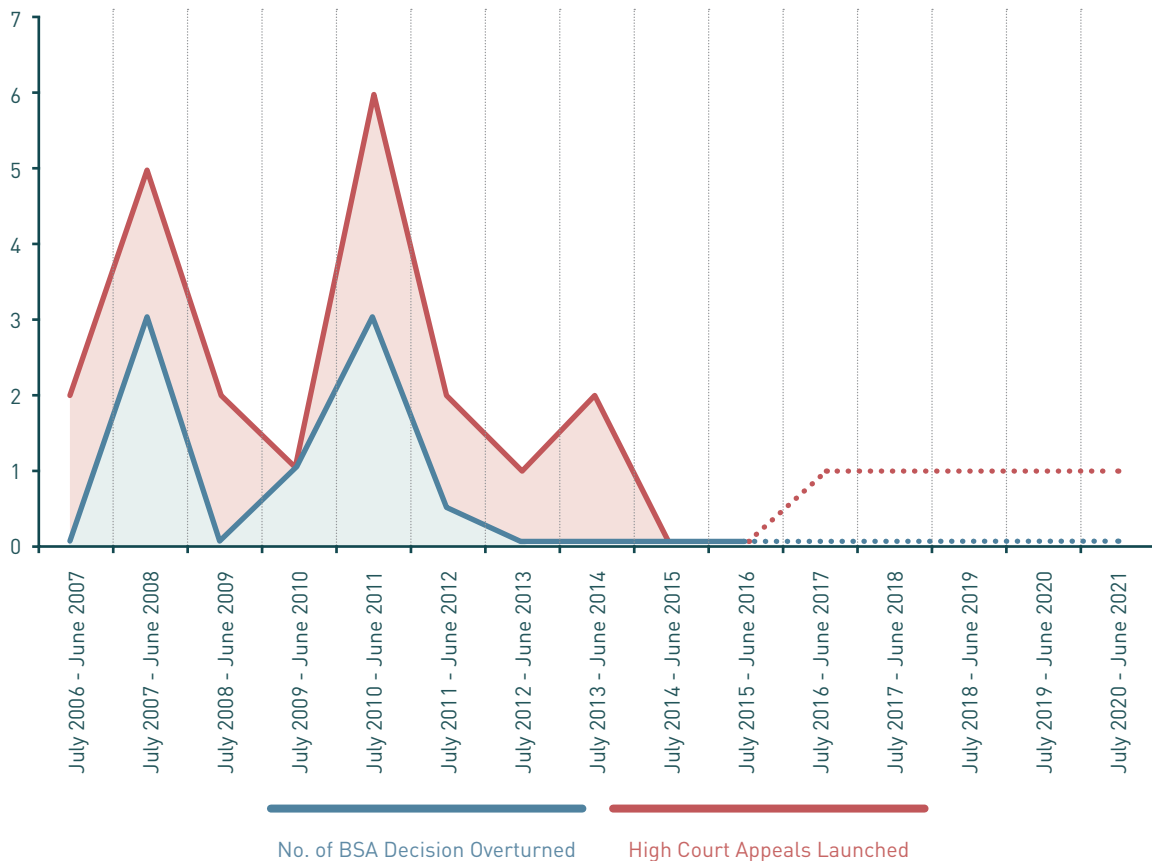
Over the years the number of decisions overturned by the High Court has been low (see Figure 2). We will continue to measure, over time, the number of appeals we receive against our decisions, and particularly the number of decisions overturned by the High Court. A real increase in overturned decisions, particularly if they go to matters of process, would be a concern and indicate that our decision making process may need improvement. If they go to substance, they may indicate that the BSA is not in tune with community standards as assessed by the High Court.

For that reason, High Court decisions are an important overall indicator of how the broadcasting standards system balances the broadcasters' right to freedom of expression with their obligation to avoid harm.

The drop in appeals lodged and upheld over the last five years is a positive indicator that the system is working well. This may reflect the evolved decision making process deployed by this Authority as it considers the Bill of Rights. We will continue to monitor this. Having said this, we see appeals as a valuable part of the complaints process, and it is important that our decision making is tested. Accordingly, we will analyse all decisions of the High Court, whether or not they overturn a BSA decision to ensure that we take into account any relevant judicial comments in our ongoing activities.

In addition, litmus testing and external reviews of BSA decisions, along with surveys of broadcaster and complainant satisfaction will provide avenues for assessing the level of trust and confidence in the BSA's delivery of its core service.

Figure 2 - High Court Appeals





## Measure 4 – A reduction in the number of complaints both upheld and not upheld, with a consequential decline in overall complaint numbers

When the system is working well:

- the number of **upheld** complaints declines over time which implies broadcasters are meeting their obligations under the broadcasting standards
- the number of **not upheld** complaints declines which implies that members of the public better identify breaches of standards and make better quality complaints
- the total number of complaints declines reflecting effective broadcaster complaints processes and improvements in the above two indicators.

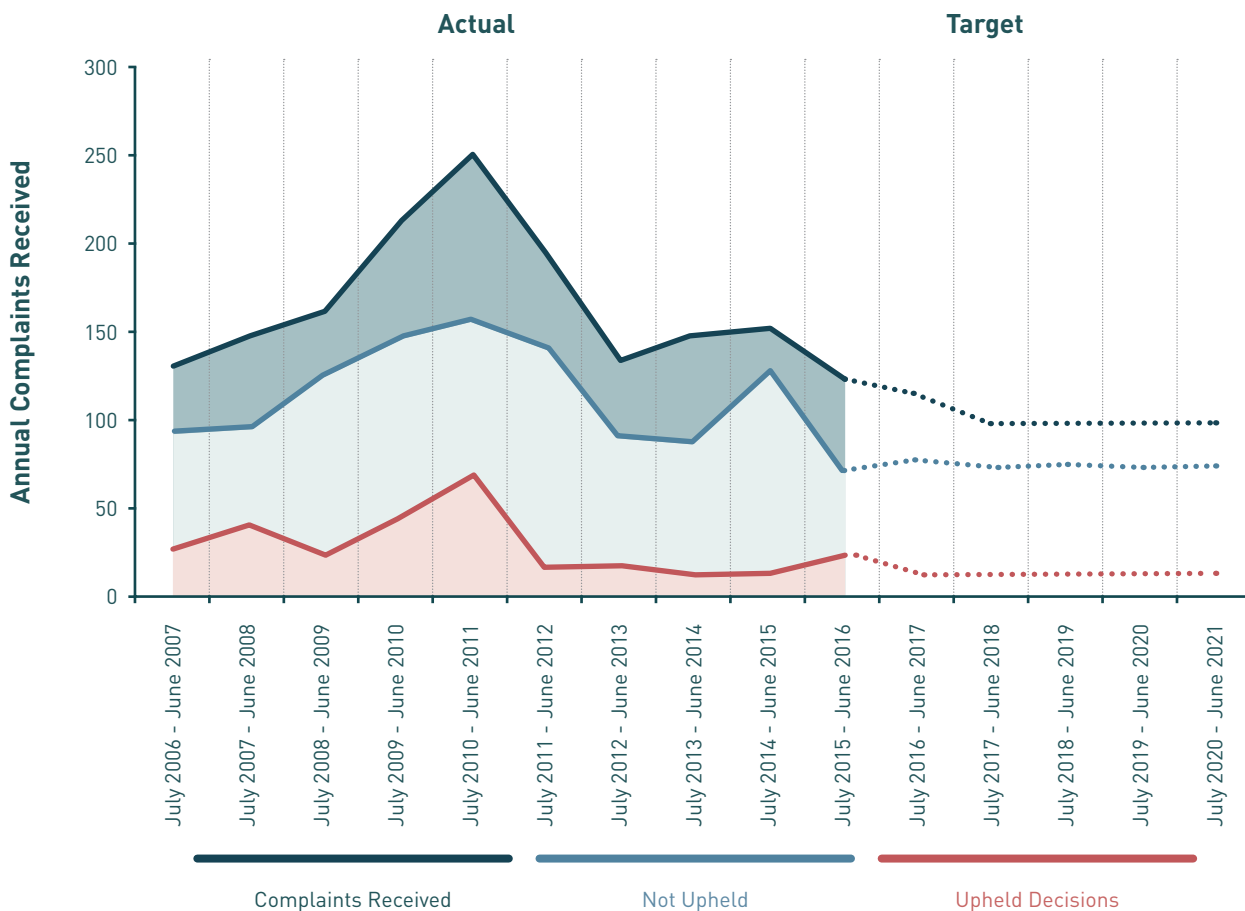
In a well-functioning system, the public will manage their and their children’s consumption of content within the standards regime and will make fewer complaints. They will understand better how – and where – to complain, so unjustified complaints will be reduced. The system (which includes broadcasters’ complaints systems as well as ours) will enable easier disposal of trivial, frivolous and routine complaints.

All broadcasters will understand their obligations and resolve complaints effectively so that fewer complaints come to the BSA. Those that are referred to the BSA will be increasingly at the boundaries of freedom of expression and the avoidance of harm, and therefore more complex and challenging.

Since identifying these measures in 2012 we have seen a reduction in complaints overall (see Figure 3 below). The ratio of complaints not upheld, and upheld, remains similar. We see this as a positive indicator that the system is working well. We will continue to monitor these figures annually.

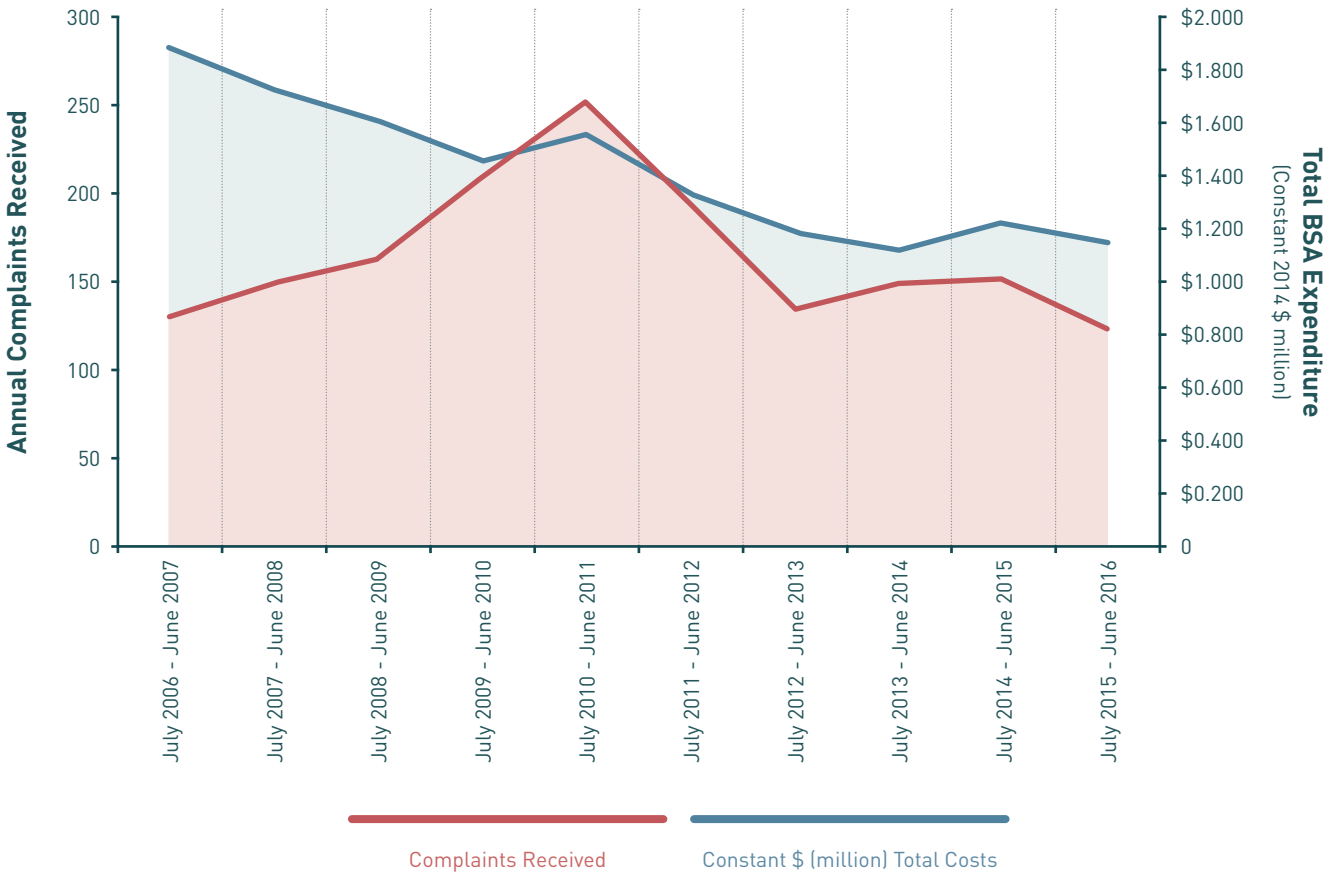
The BSA will reduce not upheld and unjustified complaints by providing information that enables viewers and listeners to respond to broadcasting in a more informed manner. This includes communicating effectively so that audiences are aware of the standards that apply, understand how to make quality complaints to the right place and have trust and confidence in the robustness of BSA decisions and its processes.

Figure 3 - BSA System Performance Indicators



## 4.4 Overall performance and cost analysis

Figure 4 - BSA Total Costs and Complaints Received



The BSA also measures its overall performance against expenditure and will provide updates of this summary in its Annual Report and in setting annual performance expectations. Over time this data provides rich information about the correlation between expenditure and overall performance of the broadcasting standards system. The BSA tracks its total cost and number of complaints received to test its performance and cost effectiveness. Arguably, where the BSA is effective, broadcasters meet their obligations under the standards and the number of unjustified complaints reduces, then there may be fewer complaints to determine. However, the overhead costs to deliver the services to support awareness and understanding of the standards regime may increase. Where costs have increased, resulting from activities

across our three core activities, we have seen a correlating reduction in complaint numbers, which indicates that our oversight and information activities have been effective at encouraging broadcasters to meet their obligations. Tracking these costs against complaint numbers illustrates the effectiveness of the BSA's service delivery.

To 2013, BSA expenditure indicated some correlation with the performance of the broadcasting standards system (see Figure 4). In 2006/2007 increased expenditure was matched by decreased complaints about broadcasting breaches. Then, in 2007/2008 a reduction in expenditure was matched by increased complaints. More recently, BSA expenditure has remained relatively steady and there has been a gradual



decline in complaints numbers. However, complaints received are increasingly complex which requires more resources to assess than in the past.

In light of the changing media environment, we have refreshed our allocation of resources across our three core activities, including increased resource allocation to our work on the broadcasting standards system and information and communications. This has rebalanced our focus on quality work on developing the codes, and research that enables us to best understand community attitudes and expectations and

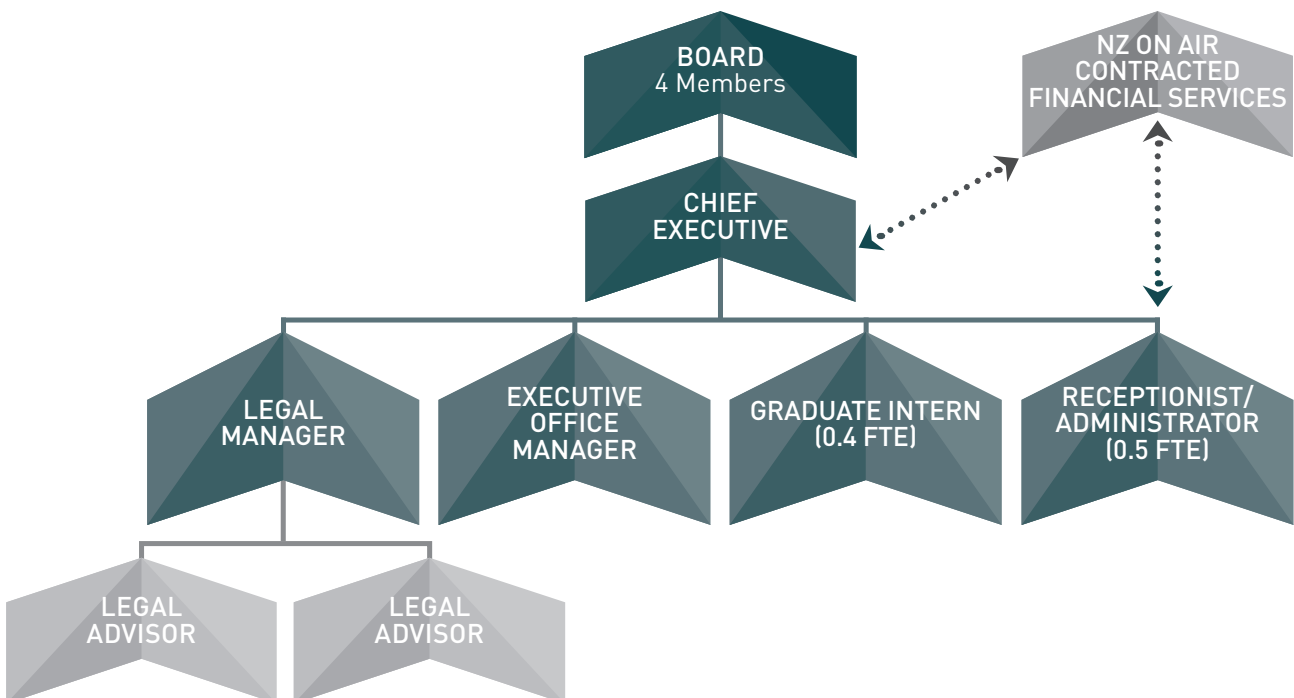
to prepare for the future environment. This includes raising awareness about the standards and the BSA, and increasing our engagement with the sector so that we work with broadcasters to support them to meet their obligations under the standards, now and in the future.

The graph in Figure 4 shows continued reduction in both costs and complaint numbers. Given the expectations of an efficient public sector, we will continue to focus on cost reduction, complaint process efficiencies and improving our interface with the standards system.

## 4.5 Organisational health and capability

### 4.5.1 Structure

The BSA is a small organisation and we foster a collaborative culture that values the input of all participants. We encourage and have a positive, flexible culture and have a clear appreciation of governance and management distinctions.





#### 4.5.2 Capability

In planning for capability and risk we take into account that we are a small organisation that comprises specialist staff. We have formal good employer and personnel policies in place and a commitment to equal employment opportunities.

We ensure that we actively monitor all the factors that affect our service delivery. This includes, but is not limited to, staff productivity; staffing changes; synergies between board, management and staff; fluctuations in complaint numbers; state sector compliance requirements; health and safety and operational risks; environmental factors; and funding.

We are also aware that complaint numbers have typically risen and fallen over time and that the current reduced level of complaints is not guaranteed to continue as it is influenced by factors outside our control. Our capability planning must ensure we remain able to continue to carry out our core services allowing for fluctuations in numbers.

The measures we use to assess organisational health and capability are set out in the Statement of Performance Expectations. Our objectives are as follows:

- Staff employment policies focus on retention and development of highly engaged, skilled, knowledgeable, adaptable, efficient team players with the tools, information and training necessary to perform to a high level.
- We maintain, seek and develop ongoing opportunities for agency collaboration and shared services in the cultural sector (or broader public sector) if appropriate.
- Our infrastructure is fit for purpose under the existing legislative requirements and we have allocated a capital budget to respond to asset replacement that may be required in the ordinary course of business and in anticipation of investment that may be required to give effect to the Government's proposed reforms.
- Our office environment and equipment are safe and well maintained.
- Equal employment opportunity principles are incorporated in staff selection and management, to achieve as diverse a workforce as possible within the limits of our small size.







BROADCASTING STANDARDS AUTHORITY  
TE MANA WHANONGA KAIPĀHO

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