

*Championing  
excellence and diversity  
in broadcasting*

Founded in 1983 by Jocelyn Hay CBE



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**RESPONSE BY THE VOICE OF THE LISTENER & VIEWER (VLV)  
TO THE BBC TRUST'S CONSULTATION  
TOMORROW'S BBC  
CREATING AN OPEN, MORE DISTINCTIVE BBC**

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**INFORMATION ABOUT THE VLV**

Voice of the Listener & Viewer Limited (VLV) represents the citizen and consumer interests in broadcasting and speaks for listeners and viewers on the full range of broadcasting issues. It uses its independent expertise to champion quality and diversity in public service broadcasting, to respond to consultations, to produce policy briefings and to conduct research. VLV has no political, commercial or sectarian affiliations and is concerned with the issues, structures, institutions and regulations that underpin the British broadcasting system. VLV supports the principles of public service in broadcasting. It is a charitable company limited by guarantee (registered in England No 4407712 - Charity No 1152136).

**EXECUTIVE SUMMARY**

1. VLV would like the BBC to continue to maintain its existing role as a broadcaster of distinctive world-class radio and television on traditional broadcast platforms, while also exploring how best to provide content for audiences on other platforms.
2. VLV considers that the BBC is currently striking the right balance between traditional broadcasting and focusing on new ideas.
3. We believe the proposals announced by the BBC in the *British, Bold, Creative* document on September 7<sup>th</sup> 2015 mark a distinct departure from traditional broadcasting and we are concerned that they rely too much on content delivered via the internet.
4. In its concern to be at the leading edge of new developments the BBC must not ignore its largest supporter group: listeners and viewers.
5. VLV believes that the approach of these proposals for the BBC to rely more heavily on the internet to deliver its mission undermines the principle of universality which has always underpinned BBC services. Not all regions of the UK have access to superfast broadband and not everyone can afford such provision.
6. BBC Newstream: While we recognize that mobile platforms are becoming increasingly popular to access news content, VLV would not want investment in broadcast news services to be reduced to support an online streaming news service.
7. Local and nations news: VLV welcomes the ambition of the BBC to better support local, regional and national news across the UK. Therefore, we welcome the BBC's

proposals to work in partnership with local and regional news organisations to provide improved services for the public. We support the proposal for a shared data journalism centre and news bank and for strengthening BBC news in Scotland, Wales and Northern Ireland.

8. We support the proposal to build on work already achieved in partnership with Arts Council England but would like to see this work extended to arts organisations in the other nations of the UK.
9. While VLV fully supports the work of the World Service, we would only support additional investment in the World Service if this is funded by income which is additional to existing licence fee income.
10. In principle VLV supports the ambition for the BBC to collaborate with other organisations to improve its provision of content which is focused on knowledge and culture, however we are concerned that there could be issues of quality control and a dilution of the clear branding of the BBC as a service which provides content produced by and for the BBC.
11. VLV supports the creation of the iPlay service but we would not want current provision of children's content on CBBC or CBeebies reduced in order to fund this proposal.
12. VLV supports the ambition for the BBC to focus its investment on more distinctive programming with an even higher level of creative ambition and to judge its success in future as much on its originality as audience share.

## **INTRODUCTION**

13. VLV welcomes the opportunity to comment on the proposals put forward by the BBC Executive in response to the Government's Green Paper on BBC Charter Review.
14. Our members value the work of the BBC Trust in ensuring that the voice of licence fee payers is heard during the process of Charter Review.
15. The research and analysis of existing BBC services in the *British, Bold, Creative* document is comprehensive and most useful.
16. It is clear from this analysis that audiences are widely appreciative of BBC services but areas which could be improved are acknowledged and highlighted.

**We would like to know whether you think the BBC is striking the right balance between continuing to do the things it does today, and focusing on new ideas. Is there anything in particular you think the BBC needs to consider in striking this balance?**

17. VLV would like the BBC to continue to maintain its existing role as a broadcaster of distinctive world-class radio and television on traditional broadcast platforms, while also exploring how to best provide content for audiences on other platforms.
18. VLV considers that the BBC is currently striking the right balance between traditional broadcasting and focusing on new ideas. We believe the proposals announced by the BBC in the *British, Bold, Creative* document on September 7<sup>th</sup> 2015 mark a distinct departure from traditional broadcasting and we are concerned that they rely too much on content delivered via the internet.
19. We welcome the concept of an 'open' BBC, especially where this concept leads to better value and more distinctive content for licence fee payers. However, we are concerned that in an effort to embrace new technology and make the BBC 'internet-fit' the BBC is moving away from its founding principles too fast. As the proposals note, 84% of television viewing is still live<sup>1</sup>.
20. VLV considers that online provision is good in principle if it is additional to current services. Online provision is not equivalent to broadcasting; it is narrowcasting and as Tony Hall said when the current proposals were launched, not everyone can afford or access the internet.
21. In its concern to be at the leading edge of the new developments the BBC must not ignore its largest supporter group: listeners and viewers.
22. VLV believes that the approach of these proposals for the BBC to rely more heavily on the internet to deliver its mission undermines the principle of universality which has always underpinned BBC services. Not all regions of the UK have access to superfast broadband and not everyone can afford such provision.
23. While the proposal to 'ride two horses' – one the traditional broadcasting model and the other the online model – seems sensible, it must also be remembered that while changes in technology and the market are having a profound effect on all broadcasters, Ofcom's latest figures show that the change in viewing habits from the traditional model towards mobile viewing is incremental and this is happening more slowly than many would have originally expected.<sup>2</sup> Free-to-air terrestrial viewing is likely to remain the primary means by which UK citizens consume television for the foreseeable future and probably for the period of the next BBC charter.
24. We accept that in the coming 10 years the BBC will need the flexibility to respond as audience habits change, but we do not accept the contention that '*As the BBC Three*

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<sup>1</sup> *British, Bold Creative*, p 58

<sup>2</sup> *PSB Review 2015*, Ofcom, Para 2.12

*proposals demonstrate, there will inevitably be a move from linear to on-demand services.*<sup>3</sup> VLV opposes the closure of BBC Three as a broadcast platform and we have made our views clear on the reasons for this in a recent submission to the BBC Trust.<sup>4</sup>

25. We acknowledge that the BBC will have to reduce spending on existing services because of the recent provisional licence fee settlement which will lead to cuts of between 10% and 20% regardless of these new proposals. We note that the new proposals made by the BBC in response to the Green Paper will require an investment of 6% of direct spending on existing services and question whether the priorities of the BBC, as set out in the current proposals, are balanced too much in favour of new media platforms rather than the platforms on which most people actually access the services.
26. We are also concerned by the emphasis laid on personalisation in the current proposals because there is evidence that personalisation of services can lead to a narrowing of horizons which VLV believes runs counter to the mission of the BBC
27. We note the hypothesis testing in the research conducted by Communications Chambers:

*Online TV services are most commonly used for seeking out specific, familiar content rather than for browsing for something new. True.*

*We found that only a quarter of users of online TV and video services (25%) reported browsing behaviour at all. 'Seek' behaviour was far more prevalent and was used by 90% of online TV and video service users<sup>5</sup>.*

*If a linear, broadcast channel is unavailable, viewers are more likely to watch another (second-choice) TV channel than to seek out that channel online.<sup>6</sup>*

28. Thus when people go online to view programmes, they search for a specific item rather than browse for content. There is less serendipity involved in this process than there is when viewers look at a linear schedule and choose to watch a programme of which they may have no knowledge but which interests them. Often viewers watch programmes which follow on from other programmes in the linear schedule and they become engaged by something they would not have searched for if they went specifically to find it online.

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<sup>3</sup> *British, Bold Creative* pg 98

<sup>4</sup> <http://www.vlv.org.uk/broadcasting-files/VLV-response-to-BBC-Trust--Provisional-Conclusions-on-proposals-for-BBC-Three-BBC-One-BBC-iPlayer-and-CBBC-Oct-2015-FINAL-061015.pdf>

<sup>5</sup> *Communications Chambers Summary of results from the quantitative research regarding proposed service changes BBC Three PVT*. October 2014, p7.

<sup>6</sup> *ibid*

29. This is a fundamental principle in scheduling public service content: to provide a mixed schedule which often attracts audiences to content which is unfamiliar to them.
30. Additionally, because the nature of online search engines means users' choices are self-selective, users' horizons are not expanded but remain limited by their interests, browsing history and tastes. VLV would argue that in order to constantly ensure that viewers' horizons are expanded, less populist, mainstream content needs to be embedded within a linear broadcast schedule so that viewers 'come across' content which they would not necessarily search for in a specific online environment.

### **FUTURE IDEAS FOR THE NEXT CHARTER**

**These are the BBC's initial ideas which will require further work. Please let us know what you think about any or all of these, for example whether you support or oppose them and why.**

**Is there anything we should think about as we continue to develop these ideas? For example do you have any views about how to make them as effective as possible? Are there any particular obstacles or problems that you think the BBC needs to take account of?**

### **INFORM**

31. We agree that the need for independent, impartial and insightful news has never been greater<sup>7</sup> and that trust is more of an issue in today's media landscape where there is a surfeit of information but it is difficult to know which information to believe.
32. We question the benefit of personalisation in news because, as stated above, this is likely to restrict our horizons rather than broaden them and runs counter to the principle of universality
33. **BBC Newstream:** While we recognize that mobile platforms are becoming increasingly popular to access news content, VLV values the service provided by TV and radio news programmes and would not want investment in these services to be reduced to support an online streaming news service.
34. The BBC News Channel and Radio 5 live provide important broadcast outlets for news which can be accessed at any time. We would not want the BBC to close these services in favour of an online rolling news service because that would reduce the plurality of provision of news on UK radio and television platforms.

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<sup>7</sup> *British, Bold Creative*, pg 62

35. Having said that, we welcome the opportunities online platforms offer to provide more context and detail on stories and believe the BBC should continue to provide its online news offering to support its broadcast services.
36. **Local and nations news.** VLV welcomes the ambition of the BBC to better support local, regional and national news across the UK.
37. News which is specific to a local or regional area is a crucial aspect of public service broadcasting and one which Ofcom has identified as not performing as well as it should. The BBC plays a very important role in sustaining citizenship and democracy by providing local, national and regional news on radio, television and online and VLV would want this aspect of the BBC's services to be maintained.
38. VLV welcomes the BBC's suggestion that it should work in partnership with local and regional news organisations to provide improved services for the public.
39. **Local Accountability Reporting service.** VLV welcomes the proposal for a licence fee funded network of public service reporters who would provide reports from places such as councils, courts and public services across the UK for use by the BBC and other reputable news organisations. VLV believes that if this project goes ahead, the BBC should award contracts to local news organisations to provide this content in order to help bolster local news providers. The BBC should also provide support to train local journalists which might be necessary.
40. **A shared data journalism centre.** VLV supports the proposal for a data journalism hub which will be shared with other news organisations.
41. **News Bank to syndicate content.** VLV also welcomes the initiative for the BBC to share its regional and local video and audio with other local and regional news organisations, although we would like this content to be provided free of charge.
42. **Strengthening BBC news in Scotland, Wales and Northern Ireland.** We support better provision of BBC news in the Nations and acknowledge that the current proposal is for this to be provided initially on a BBC News homepage for each Nation.
43. **Reflecting local culture.** VLV welcomes the proposal to build on the work already achieved in partnership with Arts Council England in The Space project. However, we question why this initiative is limited to arts organisations in England. We believe it should be extended to include arts organisations from all the UK nations because the work of the BBC should reflect the whole of the UK.
44. **World Service:** While VLV fully supports the work of the World Service, we would only support additional investment in the World Service if this is funded by income which is additional to existing licence fee income.

## **EDUCATE**

45. VLV has always valued the contribution the BBC makes to education in the UK – whether that be formal or informal education.
46. We welcome the focus on education in the BBC’s proposals because we believe there is a real opportunity to reassess BBC delivery of its education content.
47. **The Ideas Service.** VLV in principle welcomes the ambition for the BBC to collaborate with other organisations to improve its provision of content which is focused on knowledge and culture, however we are concerned that if all this content appears on a BBC platform, this will dilute the clear branding of the BBC as a service which provides content produced by and for the BBC.
48. As Tony Hall said at the launch of the current proposals, “In the internet era, it is easier to find information but harder to know whether to trust it.”<sup>8</sup> VLV is concerned that if BBC platforms expand to allow more content from outside sources, there will be issues of quality control and effective curating. Additionally there is a risk that key BBC public service content will become less easy to find if the platform becomes increasingly complex to incorporate other streams of content.
49. We would propose that the BBC links to external sites from its own site to highlight the availability of such content but it does not curate this content itself.
50. While we understand the benefits of personalisation, as stated above, there are risks that this could lead to reduced serendipity and a narrowing of horizons which would run counter to the BBC’s mission. VLV believes that personalisation should be used cautiously.
51. **iPlay.** VLV supports the creation of the iPlay service which would provide content tailored for more specific age groups. We believe this would be beneficial, but we would not want the current provision of children’s content on CBBC or CBeebies reduced in order to fund this proposal. VLV believes that the shared experience of watching content on a TV is very important and that we should not restrict children’s content to online platforms.
52. **Curriculum support.** VLV welcomes the proposal to develop curriculum resources for each Nation.

## **ENTERTAIN**

53. VLV fully supports the BBC in providing a universal service which provides something for everyone, and therefore considers entertainment a key pillar of the BBC’s provision.

54. We acknowledge that the growth in on-demand services has started to change the way in which people watch programmes and that the BBC has to consider what this means for the future.
55. **Changes to BBC Television channels.** VLV supports the ambition for the BBC to focus its investment on more distinctive programming with an even higher level of creative ambition and to judge its success in future as much on its originality as audience share.
56. We very much welcome this proposal because we believe that the BBC should be encouraged to take creative risks which set it apart from the commercial PSBs which have less freedom to do so.
57. We believe the proposals for BBC One to take creative risks with drama is a sensible one and we support the ambition for BBC Two to be more innovative and ground-breaking.
58. **Drama.** VLV supports the ambition to innovate in drama and develop new imaginative contemporary drama which will appeal to younger audiences. This is particularly important because younger audiences are migrating onto other platforms for their entertainment and VLV believes the BBC should work harder to engage this audience with content on broadcast platforms.
59. **Video on-demand.** VLV welcomes the ambition for the BBC to work with other UK broadcasters collaboratively and we look forward to seeing more detail on the proposals for a centralised UK on-demand platform in due course, however we do not believe that licence fee payers should have to pay again to view content which has been funded by the licence fee and is available on such a platform.
60. **Strengthening services in the Nations.** VLV welcomes the proposal to create an interactive digital service for each of the Nations of the UK.
61. **New ways of listening to radio:** VLV believes the current provision of BBC radio is excellent and would not want to see this provision undermined by its plans to provide new ways to listen to the radio. If these proposals are additional to current linear broadcasting, then we welcome them.
62. As stated above, we question the benefits of personalisation if this leads to a loss of serendipity and a narrowing of horizons. One of the joys of listening to the radio is that with live radio and a mixed schedule audiences are introduced to content they may not have anticipated and learn new things. We question the recent initiative to make some radio programmes available on the iPlayer ahead of broadcast.
63. **Radio music discovery service.** While VLV welcomes the showcasing of new UK music and artists, it questions whether this proposal to extend the current *Playlister* service is feasible unless a deal can be struck with those who hold the copyright to the music in question.

**Do you think any of these ideas outlined in this document are more or less important than others?**

- 64. We believe that the BBC working in collaboration with other broadcasters and news providers in local and regional news is important and could lead to a welcome improvement in local services.
- 65. We also believe that the iPlay service could provide a useful portal for children to find content which is more age appropriate.
- 66. We welcome the ambition to ensure that BBC content is more distinctive and the recommendation that there should be less reliance on audience share as a measure of success.

**Do you think there is anything the BBC should be doing less of compared to what it currently does, in order to fund the new ideas?**

- 67. We believe that the BBC could examine and reduce its current online offering and ensure that all BBC online content reflects the priorities of the public purposes.

**Do you have a view on all these ideas taken together as a package across the next Charter period?**

- 68. As stated above, VLV believes there is convincing evidence that the migration away from traditional television and radio is happening more slowly than was expected and therefore VLV believes that the BBC should focus its major efforts on delivering content via the platforms which listeners and viewers value most highly. We would propose that the BBC should maintain its research and development into new technologies, but that this should be less of a priority than ensuring that its traditional services continue to provide a range of high quality content for all audiences.