

*"Working for quality
and diversity in
British broadcasting"*



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Response from the Voice of the Listener and Viewer to the House of Lords Select Committee on Communications inquiry into BBC governance and regulation

Voice of the Listener & Viewer (VLV) is an independent, non-profit-making association, free from political, commercial and sectarian affiliations, working for quality and diversity in broadcasting. VLV represents the interests of listeners and viewers as citizens and consumers across the full range of broadcasting issues. VLV is concerned with the structures, regulation, funding and institutions that underpin the British Broadcasting system.

Introduction

For over 25 years the VLV has been a voice of the citizen in public service broadcasting matters. We have been involved in consultations on the last two occasions the BBC Charter was renewed. In commenting on the proposals for the 2006 Charter we fully supported the concept of the BBC Trust as an empowered and accountable body. We were concerned that the governance structure proposed might dilute its powers and role. However from our perspective we are generally content that the BBC Trust has fulfilled its role set out in the 2006 Charter as "Guardians of the licence fee and the public interest"

1. Are the BBC Trust's Duties clear and its tasks the right ones?

(a) The roles set out in the 2006 Charter are clear and correct. We consider the Trust should represent the licence fee payers in conducting regular reviews of services to ensure that these are delivering the best possible quality programmes to fulfil the purpose remits as set out in the Charter. Our experience of making regular submissions to service reviews is that our comments and concerns are noted and often acted upon in subsequent recommendations to the BBC Executive. The balance between undertaking independent consumer research and seeking formal evidence from interested parties has generally ensured that the interests of the licence fee payer have been fully reflected in the work of the Trust.

(b) We consider the Trust should handle complaints from licence fee payers. The BBC Trust provides a formal way for the public to complain directly to an organisation separate from the BBC.

2. Is the BBC Trust sufficiently independent?

(a) The relationship between the Trust and Executive is far clearer than that between the Governors and the Executive. We believe this arrangement is better than the previous arrangement with the Governors. It is clear that the Trust represents the viewer and listener in a way that was not clear in the case of the Governors.

(b) We were concerned by the arrangements for the licence fee settlement in 2010 because the Chairman of the Trust appeared not to be involved. We believe the Trust needs to play a stronger role in governing the BBC Executive in these key matters.

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3. How effective are the BBC Trust's processes?

(a) As we note above the Service Licence Reviews are a good way to monitor services and provide licence fee payers with a method to comment on specific services.

(b) We do not represent the interests of any part of the communications industry and therefore have no expertise in or experience of the Public Value Tests. From the perspective of the licence fee payer we consider that in the early years of the Trust they were a little cautious and some times the needs of the consumer suffered. For example, the restriction to only seven-day access after broadcast to most material on the BBC iPlayer is more restrictive than the access arrangements for other PSB providers.

(c) We have no comment to make on the working relationships between the BBC Trust and the BBC Executive Board.

4. Is the BBC Trust sufficiently accountable?

(a) We believe the BBC Trust does its best to deliver its responsibilities to licence fee payers. We consider it could work at increasing its profile. Often in the early years the Trust only came to the notice of the public when there was a scandal, but it was not noticed when undertaking activities more central to its role.

(b) We believe the Trust's accountability to Parliament is adequate as it regularly appears before and provides evidence to the House of Lords and House of Commons Select Committees.

(c) As an organisation representing the licence fee payer we have found the Chairman, individual Trustees and the staff willing to meet with our board and members and engage in useful dialogue.

5. How could the governance and regulation of the BBC be improved in the short and long term?

We have no further suggestions to make at this time other than those at 2(b) and 4(a) above. The present governance arrangements date from the Royal Charter published four and half years ago in October 2006. We do not consider that any major changes should be contemplated until the present arrangements have been given time to operate in different economic and political circumstances. We comment at 2 (b) above on the role of the Trust during the 2010 licence fee settlement but consider it would be precipitate to make changes following one incident.

5th April 2011

None of this evidence is confidential

The contact for this document is Robert Clark
Secretary to the Board of the Voice of the Listener and Viewer