

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



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Response by Voice of the Listener & Viewer (VLV) to the Public Consultation by the BBC Trust on the BBC Public Purpose Remits, April 2007

Voice of the Listener & Viewer (VLV) welcomes the public consultation by the BBC Trust on the new BBC Governance framework and the role of the Purpose Remits, and has the following observations to make.

1. Sustaining citizenship and civil society

1.1. VLV welcomes the general scope of how the BBC intends to achieve this Remit and the inclusion within the draft Purpose Remits of a strong emphasis on citizenship. This inclusion should provide both a bulwark for the maintenance of the 'citizen interest', set out in the 2003 Communications Act, and a means of preserving the uniqueness of public service broadcasting.

1.2. We are concerned, however, that this emphasis does not go far enough and that explicit references to citizenship are focused around a narrow agenda contained within the Remit 'Sustaining Citizenship and Civil Society'. In terms of content, this Remit seems to tie the BBC's citizenship obligations to particular programming strands, for example: news, current affairs, and coverage of political institutions. While such coverage is important in its own right, we believe an opportunity to stress how the BBC's other Purposes also contribute to citizenship has been missed here. For example, in 'representing the UK, its Nations, Regions and communities' the BBC helps to foster the conditions for citizenship by creating shared public space. We believe the BBC has both the unique ability and the duty, to inform the public debate and to create public space for dialogue within society and between different sections of the community.

1.3. The Trust points out that the Remits should be read as 'parts of a whole whose boundaries necessarily overlap' (Annex II, Explanatory Note). We believe, however, that by limiting the discussion of citizenship to matters predominately of news and institutional politics, the Trust risks underplaying the importance of other forms of content. We propose, therefore, that the Trust should return to the ideas expressed in the earlier BBC document: 'Building Public Value, in which the BBC offers a more wide-ranging concept

1.4. of its contribution to citizenship. Namely: 'for people in their role as citizens, the BBC seeks to offer additional benefits over and above individual value. It aims to contribute to the wider well-being of society, through its contribution to the UK's democracy, culture and quality of life'. (2004:28)

1.4. Such a shift would, in our view, carry two distinct benefits:

- i) it would recognise that a wide variety of programming can deliver value to society and citizens;
- ii) it would stress what is ultimately central to the BBC's offering – its orientation towards delivering public good 'over and above individual value.'

1.5. In addition, VLV welcomes the Trust's development of the BBC's obligations towards civil society and non-state organisations. These groups play an increasingly important role, social and political, in many people's lives, and it is right that the content the BBC provides should acknowledge this fact. In doing so, however, it is also important that the BBC gives careful thought

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to the kind of relationship it will have with these organisations. In particular, it is important to ask whether BBC intervention (such as the *Action Network* website) can be merely neutral and facilitative, or whether, by the provision of certain types of information and the highlighting of particular campaigns, the Corporation is in fact setting agendas for extra-Parliamentary campaigning. If there is any risk of such a development, we would expect the Trust to ask the Executive to clarify the nature and extent of its involvement with outside organisations in order to ensure that the BBC's impartiality and the sovereignty of the public interest are secured.

1.6. We propose two further additions to this Remit.

(i) In section four of 'what the BBC will do' we consider there should be a reference to the coverage of elections as this is crucial to an understanding of the Parliamentary process. We believe this mention should appear here rather than in the Service Licences as it will need to be applied across most of the BBC's services, including those serving the Nations and Regions..

(ii) We are pleased to see the reference to Media Literacy in section 5, but concerned that the wording seems to limit this to information technologies. We consider that the BBC has a role in promoting Media Literacy in general, and that this role should be reflected in this Remit by the inclusion of the words "all media". The relevant phrase would then read "giving them the confidence to make full use of all media, including information technologies.

2. Promoting education and learning-

2.1. We are concerned that all the other Remits have a list of six things under the heading 'What the BBC will do to achieve this purpose' whereas this Remit only gives three examples. See below and comments.

2.2 (1) Stimulate informal learning across a full range of subjects and issues for all audiences.

The BBC should enable people to learn about many different topics in ways they will find engaging, entertaining and challenging.

2.2. (2) Engage audiences in activities targeted to achieve specific outcomes that benefit society.

The BBC should engage audiences in programming that bring benefits to the UK as a whole. These programmes might, for example, promote healthier living, or encourage an active interest in the UK's history, heritage and environment.

2.2. (3). Promote and support formal educational goals for children and teenagers and support adult education, especially related to basic skills development.

The BBC should maintain its key role of providing formal educational output for everyone in the UK, including skills for work. The BBC should provide a safe environment for learning, especially for children.

2. 4. We consider that these three areas fail to deliver this Purpose fully as it appears in clause 7 of the BBC Agreement, and do not connect with the other Remits

2.5. 7(a) of the BBC Agreement states '*stimulates interest in, and knowledge of, a full range of subjects and issues through content that is accessible and can encourage either formal or informal learning*'.

2.6. 7(b) of the BBC Agreement states '*provides specialist educational content and accompanying material to facilitate learning at all levels and for all ages.*'

2.7. We suggest that a fourth section should be added, stating that accompanying material will be produced, both in conventional print form and exploiting all forms of new technology. This would then connect with the Emerging Communications Remit.

2.8. There is an over-utilitarian tone to the sections which we believe could be addressed by adding, at the end of section two, the words “the visual arts, music and literature’. This addition would also connect with the Remit to Stimulate Creativity and Cultural Excellence.

2.9. We also consider there should be a stronger reference throughout this Remit to learning for all ages and that a fifth section should be added to the effect that the BBC will ensure through the content of its services that learning is a life long process.

3. Stimulating creativity and cultural excellence

3.1. Clause 8 (1) (a) of the BBC Agreement includes the *phrase ‘through creative excellence in distinctive and original content’*. We consider that this phrase is central to this Purpose Remit and should appear in section two of ‘what the BBC will do’. The opening part of the section could then read: ‘The BBC should offer its audiences the best examples of many kinds of creative activity from urban music to opera, from ballroom dancing to football through creative excellence in distinctive and original content.’

3.2. We are concerned that there is no reference to the music performing groups employed by the BBC itself. These groups make a major contribution to the creativity and cultural excellence of the musical life of the UK especially in the Nations and Regions and through the Proms. If the Trust makes no reference to these performing groups we fear that there will be no incentive for the Executive to keep them within the BBC. We consider that they should appear in the Purpose Remits rather than the Service Licences as they make a contribution to cultural life and excellence across many BBC services. The following words should therefore be inserted before the final sentence in section one. ‘The BBC in-house performance groups should take the lead in classical music provision.’

3.3. We also consider that there should be a stronger reference to encouraging creativity and excellence in the Nations and Regions and suggest that the words “in all the Nations and Regions be added at the end of section five.

4. Representing the UK, its Nations, Regions and Communities

4.1. We welcome the attention paid to the diversity of the United Kingdom. However, clause 9(1) (a) of the BBC Agreement states : ‘*seek to ensure that the BBC reflects and strengthens original content at local, regional and national level’*. We have interpreted that as including broadcasting within the four Nations. There are several BBC services with detailed Service Licences dedicated to broadcasting within the Nations but there is no reference to them in the Remit. This omission could be rectified by adding the words ‘By having services dedicated to Scotland, Wales and Northern Ireland’ to section one of ‘what the BBC will do’.

5. Emerging communications

5.1. We consider the lists of examples in two of the sections of ‘what the BBC will do’ could be seen as too limiting and therefore suggest the following additions:

- (a) In section one ‘DAB radio’ should be added to the list of different devices

- (b) In section two the new BBC 'Freesat' service should be added. We realise that this consultation was launched after the publication of the Purpose Remits but consider it should now be included.

5.2. We welcome the specific reference to the increase in DAB coverage at section three but do not accept a figure of 90%. We consider that DAB coverage should ultimately be as good as for VHF radio and that the advantages of DAB, including its newer versions and successors, should be made available to as many licence fee payers as possible. It is our understanding that many of the remote parts of the Nations and Regions will be missed if the target coverage is left at 90%. This would be contrary to the purpose remit 'Representing the UK, its Nations, Regions and Communities.'

5.3. Targeted Help Scheme

We do not accept any part of section seven covering the BBC's involvement in the targeted help scheme. We have consistently opposed the proposal to require the BBC to take responsibility for this area which is a matter of social not broadcasting policy; a view endorsed by Select Committees of both Houses of Parliament. At the time of writing this matter does not seem to have been resolved but if the BBC is forced to become involved in the scheme of offering targeted help, then the measurement of this part of the Remit must be rigorous, transparent and openly reported.

- 5.4. We are concerned that the two measures to be provided by Digital UK will only provide information about the process. We consider that licence fee payers should be kept informed about precisely how much of their annual payment has been diverted to this purpose, how it has been spent and what it has achieved. In our comments on the earlier consultation on the draft BBC Charter and Agreement, we suggested that the relevant information should be included on the TV licence certificate just as the costs of policing and certain other public services are itemised on demands for council tax.

6. Bringing the UK to the world and the world to the UK

We consider that these two Purposes are two of the most important and we fully endorse the intentions behind their inclusion. At this stage we have only one comment and that is that more needs to be done to develop programmes which help to create a better understanding of the geographic and social conditions prevailing in other countries.

7. The specific questions

7.1. In addition to the measures included in annex I to each Purpose Remit, are there any other performance measures which the Trust should use to monitor the Purpose Remits?

7.2. We have considered this question in the context of the Monitoring and Review section along with the Compliance section in the Public Purpose Remits Draft Operating Framework. We note that, with the exception of the Sixth Purpose, most of the Remit measurements begin with the phrase 'The Trust will measure audience perceptions.' We do not consider this is sufficient: many licence fee payers will not judge the delivery of the Public Purposes by reference to the generalised Purposes but in terms of the delivery of the detailed commitments to programme making in the Service Licences.

7.3. We note that the Trust intends to hold an annual Performance Day with the Executive Board to review the BBC's overall performance in delivering the priorities set out in the Purpose Remits. We hope that the data available will include how each service has performed against the conditions set out in part 2 of the Service Licences as these are an objective measure of compliance with the Public Service Remits. (We would also expect to see this information in the Annual Report.)

7.4. The 27 Service Licences all include quantifiable commitments. We consider that these commitments should be part of the annual measurement and monitoring. To ensure that this happens, Annex 1 to each of the first five Purpose Remits should include a sentence such as 'The Trust will measure the delivery of this remit by reference to the performance of each BBC service against the relevant conditions in the Service Licence.'

8. How well do you think the BBC is currently delivering the Purpose Remit priorities? In particular:

a) Are there any priorities which the BBC could deliver better? If so, why?

b) Are there any priorities which you think are being delivered well? If so, why?

8.1. We consider that the BBC is, in general, delivering the Purpose Remits to a satisfactory, and sometimes more than satisfactory, level.

8.2. The BBC's radio services, both nationally and in the Nations and Regions, generally deliver to a more than satisfactory level throughout the day. The digital channels bring welcome extra choice.

8.3. By comparison, the BBC's television services, only appear to deliver if the entire out put across both terrestrial and digital channels is used in the assessment. Very often the programmes that meet the more challenging parts of the Remits only appear at off peak times. The digital channels bring welcome extra choice but many feel that some of these programmes should be shown on the more widely obtainable terrestrial channels.

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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 British 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. VLV does not handle complaints.