

BBC Charter Review Green Paper - Second Phase Consultation

This memorandum is written on behalf of
CBC – Christian Broadcasting Council



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The Christian Broadcasting Council of the United Kingdom (CBC) wishes to give our views regarding the review of the BBC’s Charter and we are thankful for the opportunity to respond on behalf of our organisation.

In order to be helpful we have responded by answering the numbered questions posed by the DCMS on their website [not the numbers that appear in the printed Green Paper] as well as adding our own additional comments where necessary.

Role of the BBC: Public Purposes

The BBC is a public service and is paid for by the licence fee. Because of this, we propose in the Green Paper that the BBC should have a number of very clear public purposes which can be seen in the programmes and services the BBC provides.

The five purposes listed in the Green Paper are:

- **Sustaining citizenship and civil society**
Keeping the public informed and increasing their knowledge of the world through news and current affairs.
- **Promoting education and learning through programmes and services**
Encouraging the public's interest and knowledge of a wide range of subjects and issues through general programming as well as providing specialist educational programming for all ages.
- **Stimulating creativity and cultural excellence**
The licence fee should be used to encourage UK creativity. The BBC should also enrich the country's culture through providing distinctive and original programming, fostering creativity and nurturing talent, and encouraging participation and interest in cultural activity among new audiences.
- **Reflecting the UK, its Nations, regions and communities**
Provide programmes and services that reflect the UK's different regions and communities and that make the public aware of the different cultures and alternative viewpoints seen in the UK.
- **Bringing the world to the UK and the UK to the world**
Making UK audiences aware of international issues and of the different cultures and viewpoints of people living outside the UK as well as bringing high quality international news coverage and showing the best of UK creativity, culture and talent to global audiences.

Q1a - Do you think it is helpful to create a set of specific purposes for the BBC?

Yes	X
No	
Don't Know	

Q1b - Do you agree with this list?

Yes	X
No if no, why not? (max. 800 characters)	
Don't Know	

Q1c - Is there anything you think is missing?

Yes, if yes please give details (max. 800 characters)	<p>We believe that there needs to be a sixth purpose entitled “Understanding of the spiritual aspects of life”. This should include the opportunity for the public to be informed about the Christian, Jewish, Muslim and other faiths practiced in the UK. Faith communities are very important within our society and therefore there needs to be an understanding of the different reasons for their beliefs.</p> <p>As much of this country’s law is based upon the Judeo-Christian tradition this practical outworking of faith needs to be <u>also covered</u> within the “Sustaining citizenship and civil society” provisions.</p>
No	
Don't Know	

Role of the BBC: Programme Characteristics

The Green Paper proposes that not all BBC programmes and services have to demonstrate the purposes listed in Question 1. In exceptional circumstances, we think that it is enough for some programmes and services to be produced because they are:

- High Quality
- Challenging
- Original
- Innovative
- Engaging

Q2a - Are these the right characteristics?

Yes	X
No	
Don't Know	

Q2b - Are there any other characteristics you would like to see added?

Yes, if yes please give details (max. 800 characters)	
No	X
Don't Know	

Building Digital Britain

The Government and industry want all UK households to benefit from the digital future and in order to do this television broadcasting must all be switched to digital signals. This could start to happen as early as 2008 and be completed by 2012. The Green Paper proposes that the BBC should be a responsible leader in helping the public to adopt new technologies, including digital television.

Q3 - Do you agree that the BBC should be a responsible leader in helping the public to adopt and use new technologies, including digital television?

Yes	
No if no, why not? (max. 800 characters)	X – The BBC and Commercial Broadcasters should be joint leaders in helping the public adopt new digital technologies. Already we have seen a quicker roll-out of the National Commercial DAB network than that provided by the BBC.
Don't Know	

Funding

At the moment, the BBC’s publicly funded services – including radio, TV and BBC online services – are paid for by households with a television, through the TV licence fee. During our first phase of consultation the licence fee was still seen as the best – or ‘least worst’ - way to pay for the BBC. However, digital switchover will mean that audiences will be able to watch more TV channels and in a number of different ways, such as over the Internet or through mobile phones. This might change people’s views about how the BBC’s services should be funded.

The Green Paper proposes that the licence fee should be used to pay for the BBC during the next 10 year Charter - until the end of 2016. We also suggest that a review of how we pay for the BBC takes place before then, so that we can be sure that the licence fee is still the best option in the longer term.

Q4 - Do you agree that a review of funding methods should take place before 2016?

Yes	X
No if no, why not? (max. 800 characters)	
Don't Know	

Is there anything else you would like to add? (max. 800 characters)

The PSB part of the BBC’s output should be the cornerstone of PSB, however the purely entertainment programming and its funding should be excluded from the funding of the BBC’s PSB remit. The BBC already has a number of its programmes showing as re-runs on the various UKTV subscription channels and it is therefore already involved in television where viewers have to pay, an additional fee over and above the mandatory licence fee, to watch these programmes. This principle should be extended to first runs of some new BBC entertainment programmes/films that could then be shown on a subscription channel (not fully owned by the BBC) prior to screening on one of their own four TV channels – BBC1, BBC2, BBC3 & BBC4. People wishing to watch these programmes on first run could pay a subscription and this would help fund these genres of BBC programmes. This would mean that all of the BBC’s licence fee could fund purely PSB programming.

CBC therefore supports the need for a mid-Charter review.

Governance and Regulation: Governance Model

The BBC Governors currently decide what the BBC should do in every area – they develop its detailed programme strategy, and are involved in overseeing day-to-day management of the BBC, working with the current management board. But the Governors also have to decide whether that strategy is satisfactory and whether the BBC is performing well enough. These two roles sometimes contradict each other and it is now widely agreed they need to be more clearly separated. We want to reform the system so that there can be more careful checking of whether the BBC is fulfilling its public purposes.

The Green Paper proposes to replace the BBC’s Board of Governors with a new body that we have called a ‘BBC Trust’ (although that might not be its final name). The Trust would be there to represent licence fee payers by keeping a close eye on how the BBC was performing and taking the big decisions about how the licence fee was divided between different services.

The day-to-day management of the BBC and the day-to-day delivery of TV, radio and Internet services would in future be overseen by a separate Executive Board. The Chair of this Board would be appointed by the Trust, but it would be free to take its own decisions about more detailed spending and programming issues.

Q5 - Do you think the separation of functions between the proposed BBC Trust and the Executive Board is clear enough?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>
Don't Know	<input type="checkbox"/>

Governance and Regulation: Membership of the Proposed Trust

The current board of Governors at the BBC is made up of 12 people with a range of skills and expertise. Each Governor is recommended for appointment by the Secretary of State for Culture under Nolan principles (of honesty and openness amongst others) and appointed by the Queen. Included on this board is a national Governor for each of the devolved administrations of Scotland, Wales and Northern Ireland . Each Governor is appointed for a term of up to 5 years and may be re-appointed to serve additional terms.

The Green Paper proposes that the members of the BBC’s Trust reflect the interests of a wide range of different UK communities, including members with the knowledge and expertise to understand and articulate the interests of the individual devolved Nations, and to have a range of experience in:

- Broadcasting and media industries
- The financial, legal and corporate aspects of overseeing a large and complex business that spends significant sums of public money
- Organising public opinion research and consultation

Q6a - Do you agree that these are the correct skills and expertise needed by the members of the Trust?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>
Don't Know	<input type="checkbox"/>

Q6b - Are there any communities or interest groups you feel should be represented on the BBC Trust?

(max 800 characters)

The faith communities including Christians.

Governance and Regulation: Public Interest Duties for the BBC Trust

The BBC Trust has a duty to look after the public interest. The Green Paper proposes a set of public interest duties for the BBC Trust. The BBC Trust must ensure that the BBC:-

- Fulfils its public purposes;
- Sets standards for other broadcasters;
- Is editorially independent of Government or any commercial company;
- Doesn't unfairly damage commercial media businesses;
- Is efficient and provides value-for-money to licence fee-payers; takes account of audience opinion.

Q7a - Do you think this list is helpful in defining what the BBC Trust should do?

Yes	X
No	
Don't Know	

Q7b - Is anything missing?

Yes, if yes please give details (max. 800 characters)	
No	X
Don't Know	

Accountability

In future, what you can expect from each BBC service (e.g. BBC1, Radio 5 Live) will be written down in a document called a BBC service licence. The BBC Trust should have a clear system in place to judge whether people's expectations for each service have been met and should also have a strong system for handling complaints. The Green Paper proposes that the public should have an important role in both of these systems, and puts forward a list of ways in which the public could influence the BBC, and a list of ways to increase the accountability of the BBC to licence fee payers.

Q8a - Please select any ideas that you would like to see introduced to increase public ownership and influence over the BBC:

- There should be a rolling programme of quantitative and qualitative research designed to track audience opinions about the BBC's performance, and to measure the impact of its programming.

Yes	X
No	

- Such research should be accompanied by open consultation of viewers and listeners through a number of different forums. These might include reconstituted Regional Councils, which might be elected by local licence fee payers and given a role in formally advising the Trust, new e-forums and open meetings or AGMs.

Yes	X
No	

- When key decisions have to be taken by the BBC Trust, they should be informed by deliberative research among representative groups of viewers and listeners.

Yes	X
No	

Q8b - Please select any ideas that you would like to see introduced to increase transparency and accountability in behaviour and decision-making:

- For the BBC Trust to meet in public

Yes	X
No	

- To webcast its meetings and any open meetings or AGMs that it holds

Yes	X
No	

- To publish the minutes of every meeting and the results of every piece of research

Yes	X
No	

- To publish the voting records of each Trust member

Yes	X
No	

- Trust members to be put through an external, independent appraisal process (licence fee payers might be given the opportunity to score Trust members as part of this process, and any member with a particularly low score could be replaced)

Yes	X
No	

An important part of the accountability framework for the BBC is its complaints handling process. The BBC are already reforming this process. The aim is to give complainants fair and equal access to a transparent process. In this model the BBC Trust would be responsible for final decisions in relation to any complaint. (Ofcom will continue to have the final decision on complaints about standards of harm and offence, privacy and fair treatment).

Q8c - Do you agree with this approach?

Yes	X – Care must be taken that unrepresentative “pressure groups” do not try to influence decisions.
No if no, why not? (max. 800 characters)	
Don't Know	

BBC Organisation and Infrastructure

At the moment, the BBC airs a range of programmes on TV and radio, some of which are made by the BBC itself, and some of which are made by other producers. The Green Paper proposes that the most important thing is that the best programmes should be aired. For this to be achieved, the Green Paper proposes that the BBC needs to give other producers more opportunity to compete against BBC programme-makers for programme commissions.

Q9 - Do you agree with the idea of more competition?

Yes	X
No if no, why not? (max. 800 characters)	
Don't Know	

Scope of Publicly Funded Services

The BBC's current range of publicly funded services (e.g. BBC One, Radio 5 Live etc.) has broad support and we do not propose to shut down or privatise any of them.

The Green Paper proposes that the BBC should be able to add to, or decrease the number of its services over the next 10 years. However, as any change to the BBC's services will have an impact on the rest of the broadcasting market, we believe that the BBC should have to prove that any significant change to its services is in the public interest, once market impact has been taken into account.

Currently, any proposal for a change in a BBC service has to be judged and approved by the Secretary of State for Culture. The Green Paper proposes that when considering a new BBC service (or changing an existing one), the BBC Trust should do the judging by:

- Testing and taking account of potential market impact
- Testing and listening to public opinion about the change
- Considering the proposal in public

The Trust would then make a public recommendation to the Government, which the Secretary of State for Culture would only be able to reject if the process for making the decision had been flawed in some way.

Q10 - Do you agree that the BBC should be able to propose changes to its range of services over the course of the next 10 years in this way?

Yes	
No if no, why not? (max. 800 characters)	X - The problem with the BBC proposing its own changes, without consulting Ofcom, is that changes to formats can have a disrupting effect upon both commercial broadcasters and the new community broadcasters.
Don't Know	

Scope of Commercial Services

The BBC’s commercial services generate income from commercial activity - for example by selling BBC programmes overseas, and by publishing a number of books, DVDs and magazines.

At the moment, there are few constraints on what the BBC publishes. For example, some magazines - like Radio Times and Top Gear - are closely related to their programmes, and some - like BBC Homes and Your Hair - are less closely related. Other examples of magazines are: BBC Learning is Fun; Bob the Builder; BBC Parenting Magazine; BBC Wildlife; BBC Homes and Antiques; The World of Cross Stitching; BBC Gardeners' World.

The Green Paper proposes that the BBC should be encouraged, as now, to generate income from commercial activity. However, we also propose that continuing activity should be related in some way to the BBC’s public purposes and should have a direct connection to publicly-funded programmes or services. For instance, magazines should have sufficient links to BBC content.

Q11 - Do you think that the BBC’s commercial services should be closely related to its public purposes (outlined in question 1) and its public services (i.e. its programmes)?

- **Sustaining citizenship and civil society**
- **Promoting education and learning through programmes and services**
- **Stimulating creativity and cultural excellence**
- **Reflecting the UK, its Nations, regions and communities**
- **Bringing the world to the UK and the UK to the world**

Yes	X – However there needs to be a sixth purpose entitled “Understanding of the spiritual aspects of life”.
No if no, why not? (max. 800 characters)	
Don't Know	

Beyond the BBC

In addition to the BBC, ITV, Channel 4 and Channel 5 have public service broadcasting responsibilities. Ofcom has suggested that, with the growth in the number of TV channels increasing competition for media users, there is risk that public service broadcasting on these channels might decline. Ofcom has suggested that the Government considers diverting some public funding, possibly including the licence fee, to other channels.

In the next 10 years, we intend to review the way we might respond.

Q12 - Do you agree that this review should take place?

Yes	X
No	
Don't Know	
Other (max. 800 characters)	When only one organisation can legally demand a fee from the general public for just owning a television set then it is incumbent upon both the Government and Ofcom to look at the possibility of using the licence fee to fund a number of PSB programmes provided by other broadcasters. CBC believes that such a review must take place.

Have your say

Please use the space below to submit any further comments.

(max. 800 characters)

We support the need for the BBC to be properly funded to undertake its PSB role, but that the mandatory licence fee should only be on the basis of providing the income stream for their PSB TV channels and the operating of their existing radio services – Radios 1, 2, 3, 4, 5 Live, one national/local radio service plus 1Xtra, 5 Live Extra, 6 Music, BBC 7, Asian Network and the domestic broadcasting of BBC World Service.

We do not believe that the future funding of the BBC should enable them to continue to dominate both AM and FM radio bands. The funding of their radio services, through the TV licence fee, should enable Ofcom to stop the BBC simulcasting many of their local radio services on AM and FM thus releasing these frequencies for the future use by ILR and community radio.

CBC would support an enhanced mandatory licence fee for the BBC continuing at the present rate + RPI provided that it is focused on providing PSB.

We trust that this memorandum will be a useful contribution to the review by the DCMS of the Review of the BBC's Charter.

Yours truly,

Mrs Olave Snelling
Chairman of the Executive Council – Christian Broadcasting Council

J Peter Wilson
General Secretary to the Trustees – Christian Broadcasting Council

26 May 2005

The Christian Broadcasting Council, known as CBC, was founded in 1983:

- ✓ *To stimulate and promote the knowledge of the Christian faith and the propagation of the Gospel of Jesus Christ through the broadcasting media in the United Kingdom.*
- ✓ *To encourage the highest standards of Christian media communication.*
- ✓ *To support and develop the knowledge and standards of all those involved in broadcasting.*
- ✓ *To bring together in fellowship those working in broadcasting and those who support the vision of CBC, undergirding and encouraging them in their spiritual lives.*

Membership is open to individuals, corporate bodies and Christian ministries. The Executive Committee of CBC contains representatives from the independent Christian broadcasting sector including radio (community, commercial & RSL), television and independent production.