

**HOUSE OF LORDS SELECT COMMITTEE ON
COMMUNICATIONS**

INQUIRY INTO BBC GOVERNANCE AND REGULATION

**SUBMISSION FROM THE INTERNATIONAL BROADCASTING
TRUST**

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

- i. We believe that the BBC Trust is a far better model than the BBC Governors model. We agree with Lord Grade when he said in his evidence session before the Committee: *I think it is better times two than the governance structure which existed before. Is it perfect? Absolutely not.*
- ii. We agree with Sir Michael Lyons that the primary role of the Trust should be to represent the interest of licence fee payers.
- iii. We believe that there has been confusion between the role of the Chair of the Trust and the Director General. We would like to see the Chair of the Trust taking a far more publicly active role as leader of the BBC, setting strategy, being proactive rather than reactive, and being an inspiration to the staff of the BBC.
- iv. We believe there would be potential benefits if all regulation of the BBC came under the responsibility of Ofcom as this may enable the Trust to focus its efforts more efficiently on delivering good quality, good value programming for licence fee payers.

2. Is the BBC Trust sufficiently independent?

- a. We believe the Trust is sufficiently independent of Government. We refer to one example cited by Sir Michael Lyons when providing oral evidence to the Lords: he reminded us of his refusal to the Government to take on the cost of providing support to the over 75's in recent licence fee negotiations.
- b. The current arrangement is far better than the previous arrangement with the Governors. As cited by many of those giving evidence to the Committee, the Governors

were inward looking whereas the Trust is outward looking. We believe the Trust is far more independent from the Executive which is beneficial. It is clear that the Trust represents the viewer and listener as opposed to the Governors who, as Lord Grade noted in his evidence, represented *the institution* rather than viewers.

3. How effective are the BBC Trust's processes

- a. We have no comment to make on this question regarding oversight of BBC Management.
- b. The Trust has a specific duty when conducting a Public Value Test to consult the interests of industry. We believe that this could lead to a conflict of interest where licence fee payers interests may be disregarded because of the overriding interests of industry. We would like to see a clearer articulation that licence fee payers are always the Trust's first priority.
- c. We believe the Service Licence Reviews are a good means to monitor services to ensure channels are delivering the best possible quality programmes to fulfil the purpose remits as set out in the Charter. They also provide licence fee payers and stakeholders with a means to comment on specific services.

IBT has submitted comments and evidence to most of the Service Licence reviews. As a result of IBT submissions changes have been made to the BBC2, BBC3 and Cbeebies Service Licences. We believe that this is evidence that the BBC Trust does listen to licence fee payers and institute changes where they consider them necessary.

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 believe that it is sufficiently accountable and transparent in its workings.
- b. We believe the Trust's accountability to Parliament is adequate.

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

We have no suggestions to make on this point.

6. Compliance at the BBC

Whilst the Committee has not asked any questions specifically about compliance, we understand that it is interested in considering this matter. As a result of discussions with a number of independent producers, IBT has recently become concerned about how compliance works at the BBC. As a result, we have commissioned an independent piece of research looking at compliance across a number of UK broadcasters. This research has been published on our website at www.ibt.org.uk and copies have been sent to the

two BBC executives dealing with this matter, David Jordan and George Entwistle. The report does indicate that there are a number of concerns expressed by producers about how compliance at the BBC is making it much more difficult for producers to make challenging programmes. I have attached a copy of our report with this submission.

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This evidence is submitted by Sophie Chalk, Director of Campaigns for the International Broadcasting Trust, on behalf of the International Broadcasting Trust.

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