

Our questions**Question 1 – Your views about three overall options**

To start with, please read through the three options below: copying, restoring and reforming.

Then please rank them 1, 2, 3 where 1 is your favourite and 3 is your least favourite by writing the numbers 1, 2, 3 in the boxes.

If you wish, you can just identify your favourite as number 1. You will be able to say more about your preference/preferences later on.

The BBC should be copying the current concession

Copying the current concession means that all households with someone over 75 would get a free TV licence. But to allow for the cost of this, we believe the BBC would have to make a large number of cuts to current programmes and services.

The BBC should be restoring a universal licence fee

Restoring a universal licence fee means that there would be no free TV licences for any older age groups. Households with someone over 75 would have to pay the licence fee like other households. Although there is still a cost to the BBC, we believe the overall result would be no significant cuts to BBC services as a result of this option.

The BBC should be reforming the concession in some way

Reforming the concession means that there would still be some kind of licence fee concession for older age groups but it would be different from how it is now. For example, this could involve providing some kind of discount on the cost of the licence to older households, or changing the starting age for free TV licences, or focusing on those older households in greater financial need. We believe each of these options would mean fewer cuts to the BBC's programmes and services, compared with copying the current concession of free licences for all households with someone over 75.

.....
(Tick here if you do not wish to complete the above.)

Don't know / prefer not to answer.

Copying the existing concession (free TV licences for all over 75s) and restoring the universal licence fee (no free TV licences for older people) have both operated at different times and we know how they work. But reforming the concession (doing something different) would be new and would need to be designed.

If we were reforming the concession ...

Question 2a – Your views about three particular reform options

In the consultation document we discuss three possible ways to **reform** the licence fee concession for older households:

- We could **discount** the cost of the licence fee for older households. This would mean older households would pay something, but not the full amount. In the consultation document we set out a scenario where households with someone over 75 would pay half the cost of a TV licence.
- We could **change the age** at which households receive a free TV licence to any age above 65. In the consultation document we set out a scenario where all households with someone aged over 80 would receive a free TV licence.
- We could **means-test** a licence fee concession for older people. In the consultation document we set out a scenario of providing free TV licences only to households with someone over 75 in greater financial need, by linking free licences to one of the Government's measures of pensioner income: Pension Credit.

Whatever your answer to question 1, we would still like to have your view on reforming the concession.

Please rank these specific options for reforming the concession as 1, 2, 3 where 1 is your favourite and 3 is your least favourite by writing the numbers 1, 2, 3 in the boxes.

If you wish, you can just identify your favourite as number 1. You will be able to say more about your preference/preferences later on.

Discounting, where households with someone aged 75 and over pay half the cost of a TV licence.

Raising the age, where households of those aged 80 and over get a free TV licence.

Means-testing, where households of those aged 75 and over in greater financial need, linked to Pension Credit, receive a free TV licence.

.....
(Tick one of these as applicable if you do not wish to complete the above.)

None of these.

(SEE ATTACHED)

Don't know / prefer not to answer.

Question 2b – Your views about discounting: what discount?

The BBC has the power to set a discount at any level for older households.

The smaller the amount that older households pay for their TV licence, the more cuts the BBC would have to make to cover the cost of this.

We described a discounting option where households of those aged 75 and over pay 50% of the licence fee (that is, older households pay 50%).

In that option what percentage would you put (that is, older households should pay what % of the licence fee)?

(Write any percentage between 1% and 99%)

Please write the percentage in this box.

.....
(Tick one of these as applicable if you do not wish to complete the above.)

I'm not in favour of this reform.

Don't know / prefer not to answer.

Question 2c – Your views about changing the age: what age?

The BBC has the power to set the age at which households begin to receive a free TV licence at any age from 65 and above.

The lower the age, the more people would receive a free TV licence but the more cuts the BBC would have to make to cover the cost of this.

We described a changing the age option where households of those aged 80 and over get a free TV licence.

In that option what age would you choose?

(Write any age from 65 and above)

Please write the age in this box.

.....
(Tick one of these as applicable if you do not wish to complete the above.)

I'm not in favour of this reform.

Don't know / prefer not to answer.

Question 2d – Your view on combinations

Thank you for giving your views on ways to **reform** the concession. In the consultation document we explain that different ways of **reforming** the concession could be combined.

If we were reforming the concession, which of these features would you favour in combination? You may tick as many or as few as you wish.

Discounting so that households with older people pay a percentage of the licence fee.

Changing the age threshold from 75, to some other age.

Means-testing to focus only on older people in greater financial need.

.....

(Tick one of these as applicable if you do not wish to complete the above.)

None of these.

Don't know / prefer not to answer.

ROYAL TUNBRIDGE WELLS & AREA ACCESS GROUP
Founded 1948

10 December 2018

END OF FREE TV & RADIO LICENCES FOR OVER 75's:

At a meeting of our Group held on Monday 26th November 2018, the recent advert on BBC TV stating that from 2020 the government would no longer subsidise free licences for the over 75's and the reductions for people with disabilities caused concern.

Members initially raised the issue of the "non retrospection clause in English Law", which requires that changes of this nature only apply to new applicants not to existing recipients of allowances or other benefits etc. A Judicial Review may well uphold the clause and view, which could upset government plans to cut funding and place the financial burden firmly on the BBC.

The Tunbridge Wells Over 50's Group (TWOFS) which represents elderly people made the point that many over 75's rely upon their TV and radio for sources of news as well as entertainment, many do not go out. This also applies equally to many groups of disabled people too.

The Osborne cuts many of which are now taking effect have resulted in many services being withdrawn by local and central government, which disabled people and the elderly rely as part of economies. These cuts have hit the disabled, elderly and the less well off seriously. Many people with severe learning and mental health impairments do not go out and rely upon their TV and radio as their principal outlet to news and entertainment.

Furthermore, cuts to allowances, benefits for disabled people who were not part of the government "triple lock", have reduced their ability to pay for their disability specific care, support and equipment, leaving them particularly financially vulnerable.

Campaigning for the Rights of all Disabled People

With this in mind we would like to make the following suggestions:-

1. The introduction of Freeview has introduced many additional TV channels, if all the Freeview operators and that includes the BBC were to contribute an equally agreed amount to cover the cost of "free licences", it would, at a stroke, reduce the burden that government appears to impose upon the BBC who rely primarily upon the licence fee as their source of revenue.

Alternatively:

2. A levy on all streaming services (Amazon and Netflix for example), satellite services (Sky) and existing terrestrial channels.

The amounts involved would be "small" if all participated in an agreed amount. This would not necessarily affect the current licence funding system for the BBC, nor would it affect other operators who derive their revenue from advertising. It may be possible for the agreed "small contributions" involved to be paid into a national charity created for this purpose, which could mean that donations given by operators, including the BBC, would be tax deductible or subject to the government "Gift Aid Scheme". Some of my members may be very elderly or disabled but they are not brain dead and are, through circumstances, become very tax creative.

The other suggestions posed in the consultation document are frankly unacceptable to both TWOF's and our Group, as they are for Kent Association for the Blind, CILK, RNIB, Age UK (Kent) and many other groups representing the vulnerable. It is worth reflecting that the Equality Act 2010 has a legal duty and requirement to, and I quote:

"disabled and elderly people must be treated more favourably than other groups to enable and empower them to live independently and participate fully in society"

It also would breach the UN Convention on the Rights of Disabled People adopted by the UK in 2000 and formerly ratified by parliament in 2009 leading to the legally binding UK Disability Strategy 2012 & Action Plan. The government via the Cabinet Office in 2016 made clear that they now have a legal duty to meet total compliance by 2025 and have stated:

"the articles of the UN Convention are non negotiable and must be complied with by 2025 or sooner if resources

permit”.

This was reiterated in 2018 and remains policy because many flagship policies are based upon this long held assumption of total compliance by 2025.

The Cabinet Office also made clear that the then Prime Minister Tony Blair introduce the UN Convention into UK Law “by the back door” when he introduce The Equality Standards in Local Government Targets 2000, which require, at the lowest level of compliance, “adoption an full compliance” with the UN Convention. The implications are that all administrations must comply or face sanctions according to the UNCHR. The National Disability Cuts Watch Team in evidence to the UNCHR and to other countries including USA, Canada, Australia, New Zealand and many of the EU countries are seeking the imposition of sanctions if the UK fails to meet compliance by 2025 with the UN Convention. That would be very unwelcome post Brexit.

My members instructed me to say that the BBC must impress upon the Secretary of State for Culture, Media & Sport that the government have a “legal duty to support the disability specific needs of all disabled and elderly people, irrespective of the cost”. However it is for the Minister to impose the above suggestion upon Freeview operators and create the national charity for that purpose as a way of reducing funding costs for the government, thus not depriving unduly the BCC of its Licence revenue.


Chairman RTWAAG
SE Rep' National Disability Cuts Watch Team
