



BBC Charter Review
BBC Audience Council Northern Ireland
Submission to the BBC Trust

Introduction

1. As the BBC Audience Council for Northern Ireland, we represent the interests of audiences in Northern Ireland to the BBC Trust, the governing body of the BBC. We come from different backgrounds from outside the BBC and work as volunteers to ensure audience views impact on major Trust decisions about services that matter to them. Our advice is rooted in our understanding of local audiences and the broadcasting landscape in Northern Ireland. It is informed, above all, by our rolling programme of audience engagement, which allows us to hear the views of local licence fee payers in all their diversity. We are grateful to everyone who has taken the time to share their views.
2. This paper represents our advice, on behalf of local audiences, on the BBC's future as the government considers its new Charter. We have responded in two sections. The first relates to the questions that the government posed in its Green Paper in July¹, as relevant to audiences. The second relates to BBC management proposals for the future BBC outlined in the document British, Bold, Creative².
3. The scope of these consultations is very wide and we have tried to focus on what matters most to audiences, as distinct from stakeholders and the industry who are also represented in the consultation process.
4. We believe that the key priorities for audiences in Northern Ireland for the next Charter period are:
 - to continue to provide high quality, distinctive content and be prepared to innovate and take more creative risks in pursuit of public value
 - to provide more value for less well served groups, taking account of demographic changes
 - to develop a strategy for young people to ensure this audience receives value from the BBC, now and in the future
 - to continue to invest in and develop broad ranging and distinctive local services, recognising their huge importance to audiences in Northern Ireland

¹ The Department for Culture Media and Sport BBC Charter Review Public consultation which launched in July 2015 posed nineteen questions
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/449830/DCMS_BBC_Consultation_A4__1_.pdf

²The BBC Executive published its proposals in a document entitled British, Bold, Creative in September 2015:
<http://downloads.bbc.co.uk/aboutthebbc/reports/pdf/futureofthebbc2015.pdf>

- to enhance portrayal of, and cultural relevance to, Northern Ireland audiences on UK-wide services
- to build relationships with the audience so that they feel they own the BBC; find ways to listen to the diversity of audiences, including those who are less well connected to the BBC, and act on what they say
- to enhance and demonstrate value for money
- to develop and future-proof the BBC's services as new technologies emerge, working to close the digital divide
- to make necessary efficiencies in a strategic manner, with audience needs uppermost
- to deliver economic and societal benefits to Northern Ireland in line with the Public Purposes, including investing in local talent and contributing to sustainability of the creative industries
- to set a high standard for all broadcasters

Part 1: Our response to the Government Green Paper questions

Why the BBC? Mission, purpose and values

How can the BBC's public purposes be improved so there can be more clarity about what the BBC should achieve?

Should Charter Review formally establish a set of values for the BBC?

Mission

5. The BBC's mission to Inform, Educate and Entertain is strongly endorsed by the audience, and is as relevant for the BBC of the future as it has been in the past. Audiences we spoke with underlined the importance of the mission 'to entertain', so that the BBC delivers a broad service with something for everyone. Entertainment is seen as integral to the BBC's overall mission and delivery of its public purposes and a way to engage people with content that they might not otherwise seek out. There was some concern that entertainment could be underplayed in a new Charter, which people who engaged with us felt would be to the detriment of all audiences, particularly those that already have less connection with the BBC.

"These days you can't educate without entertaining as well..."

"To inform, educate and entertain are not separate ambitions but must work together across programmes..."

"We should be entertained ... the BBC is for all people"

Public Purposes

6. We think that the Public Purposes have been of critical importance in ensuring that the BBC delivers for its audience against its unique remit. The Trust's Public Purpose tracking survey has been an important tool for understanding the gaps between what audiences expect and how well they think the BBC delivers for them. This has, in many ways, created a framework for important discussions about issues like portrayal, with the perspectives of licence fee payers front and central.
7. The Green Paper asks if the Public Purposes should more clearly set out boundaries and apply constraints on genres. We believe that it is vital that the Purposes are broad and

focused on benefits to audiences, so that they allow the BBC to respond to changing needs and opportunities.

8. We have contributed to the Trust's work on developing proposed Public Purposes in its response to the Green Paper³. We think that the Public Purposes should be bold, modern, innovative, dynamic and inspiring, and neither stuffy nor patronising, particularly when compared with the tone used by other large media organisations. While many audience members want the comfortable 'Auntie' image, they also want the BBC to embody an ambitious, relevant and forward-looking remit.

"We like the old stuff but the BBC has always been good at moving things on and we want that too."

9. Greater clarity and simplification are welcome – the Public Purposes should be easily understood and jargon free. This will give the BBC more scope to communicate its remit effectively to the audience – an area where we believe much more could be achieved.

10. We think it is likely that the wording of the Public Purposes, as proposed by the Trust, will need further refinement in light of the consultations and other evidence. For example:

- **First Purpose: To provide news and information which help everyone understand the world around them.** We think that the proposed wording defines a step in the process of promoting citizenship rather than the higher aim.
- **Fifth Purpose: To reflect the UK to the world.** We noted that 'bringing the world to the UK' was not fully encompassed in this proposed Purpose – yet audiences tell us how important it is that they understand the wider world in the context of the UK and Northern Ireland.
- **Sixth Purpose: To contribute to the UK's creative economy.** We agree that the Purposes should encompass the BBC's social and economic impact. Whilst this proposed Public Purpose is less directly relevant to many sections of the audience, there is wide support for the BBC's role in this area when people are aware of it. We suggest that this should be a standalone purpose, rather than integrated into the output based ones, as this reflects audience understanding. Improved communications and reporting at UK and Nations level should help to explain the BBC's role and performance in this regard more effectively.

11. It is vital that there is a robust and clear measurement framework. We can see the advantages in the Trust proposal which differentiates between impact on the economy, licence fee payers as citizens, licence fee payers as consumers and the BBC itself. However, it will be important to ensure that the needs of audiences, who pay for the BBC, are given primacy, and that sufficient attention is paid to those groups which are less well served.

12. Whilst it is important to get the wording of the Public Purposes right, the critical debate for audiences will always be around what they receive in return for their licence fee. This has particular resonance in Northern Ireland where perceptions of value for money from the BBC have tended to be lower.

³ The Trust proposed wording for six Public Purposes in its response to the DCMS Charter Review consultation: http://downloads.bbc.co.uk/bbctrust/assets/files/pdf/about/how_we_govern/charter_review/dcms_response.pdfP9-10

13. We believe that there is a strong need for Public Purpose driven interventions by the BBC in Northern Ireland, based on changes in society and reflecting differences with other parts of the UK. The BBC's structures, decision-making and resource allocation should be designed to promote the Public Purposes to the best effect for audiences.

Values

14. We think that the Charter should include values that underpin everything the BBC does. Licence fee payers have very high expectations of BBC values as well as its public service remit and services. Independence, impartiality, value for money and high editorial and creative standards are consistently key values for the audiences that we have engaged with. Whilst there are undoubtedly other values or attributes that are important, as Trust research shows⁴, we suggest that there is benefit in focusing on these four at the level of the Charter. There should be as much clarity as possible about what is meant by each value, and the BBC must be able to demonstrate in meaningful ways how they inform every aspect of the BBC's activities and are embedded in its culture.
15. The Public Purposes and Values should be defined and reflected each year in the BBC Executive's plans with clear targets and actions so that they can be monitored and measured.

Which elements of universality are most important for the BBC?

16. The Green Paper asked which of the three definitions of universality were most relevant for the BBC:
- to provide all types of content and meet the needs of all audiences, regardless of the extent of provision by others
 - to provide due emphasis on covering single unifying events
 - to be available and accessible on all platforms and devices
17. Audience feedback suggests there is wide acceptance of the second and third points. Accessibility is a major issue for those people who do not have access to all the BBC's services, and we believe that the BBC should do all in its power to ensure all audiences can access the range of the BBC's services in convenient ways.
18. The feedback that we have received indicates that most audiences believe, often very strongly, that the BBC should have a broad remit and offer something for everyone. There is a clear consensus across diverse audiences that we spoke with that it should not be confined to areas of market failure, i.e. areas like UK children's content, where there is insufficient provision from the commercial sector. For the vast majority of people the breadth of services, underpinned by the values and quality they expect of the BBC, is central to the value proposition.
19. However, there is also a strong view that BBC content should be distinctive from other providers. Audiences tend to describe distinctiveness in terms of programmes and content rather than genre boundaries – for example innovative approaches, added public service value, quality, standards and content which relates to and connects with them. They want the BBC to add to their choices and to help to raise standards as a whole. They have also been quick to tell us that distinctiveness and popularity are not mutually exclusive. These high expectations are thrown into relief on those occasions where the BBC fails to deliver.

⁴ http://downloads.bbc.co.uk/bbctrust/assets/files/pdf/about/how_we_govern/charter_review/annex_a.pdf p

20. We are aware, however, that some sections of the audience feel that they receive little value from the BBC. The corporation needs to prove its credentials as a universal service by offering more for less well served groups, particularly younger audiences.
21. That does not mean that the BBC should provide all things for all people. We agree that there are times when it is appropriate for the organisation to limit its scope – especially in the context of financial pressures. For example, the Trust decision to scale back BBC Online several years ago has not, in our view, diminished the overall offer to audiences but rather provided greater clarity and focus for continued development of the service. Similarly, there are areas of accelerated costs such as high-end sports rights where the BBC has to consider the overall value to the audience against the cost of the service, which will always be available through other providers. These decisions work when they are based on audience priorities and look to new ways to meet needs. For example, the BBC could respond to the challenges in sports rights by offering coverage of a wider range of sports – minority sports and those, like hockey, which have less coverage but high rates of participation. This would add public value and contribute to the distinctiveness of the offer.
22. In summary, we believe that universality means a broad yet distinctive service, accessible to all and with something for everyone.

What the BBC does: scale and cope

Where does the evidence suggest the BBC has a positive or negative wider impact?

Is the expansion of the BBC's services justified in the context of increased choice for audiences? Is the BBC crowding out commercial competition and, if so, is this justified?

23. These are primarily questions for the regulators and industry, rather than the general audience, and we note the Trust's evidence-based work in this area. We are also aware of a perception amongst audiences that the market has expanded much more than the BBC. If anything, audiences would like the BBC to provide more. Entertainment is very important and there is a keen sense that the BBC must continue to contribute strongly in this area, including popular mainstream programmes, but with distinctive content that helps to keep standards high across the board.
24. It is important that considerations of market impact take full account of regional variations and any potential downsides for the audience.

What role should the BBC have in influencing the future technological landscape including in future radio switchover?

25. As we would expect, most audience groups believe that the BBC should continue to keep pace with technological change. For example, the BBC iPlayer has made a major impact on the value that audiences receive. As the pace of change intensifies the need to future-proof the BBC's services and public value is more important than ever.
26. It is also very important that the BBC does not deliver this at the expense of those sections of the audience who - for reasons of affordability, access, media literacy or, indeed, personal preference – are not availing of new technology. We have expressed our concern to the Trust, particularly around the recent decision to close BBC Three as a broadcast service and reinvent it online, that the extent and speed of take up of new

consumption methods can be overestimated, and that some already less well served groups are losing out. It is imperative that the BBC considers carefully where it needs to 'ride two horses at once' and defines its strategy and prioritises its spend accordingly. Future-proofing is not about being at the forefront of the industry in every sense, but about safeguarding the value of the BBC's services for all audiences as needs change.

27. We agree that the BBC has a key role to play in helping audiences get the most out of emerging digital technologies. As digital services develop across the marketplace it has a public service duty to help bridge the divide between the 'haves' and 'have nots'. The BBC should look first and foremost to raising awareness of, and connection with, those initiatives it has already invested in. For example, we have found that awareness of iWonder seems very low among relevant audiences in Northern Ireland.
28. We note that the Trust has not proposed a specific 'digital' Public Purpose, as this crosses all the output areas. We would like it to be a clear requirement that the BBC can track its performance to ensure that the digital divide is narrowed rather than widened, so that those audiences who avail less of new technology receive sufficient value for their licence fee.
29. Digital radio switchover is a subject which really concerns some sections of the audience. In Northern Ireland take up is particularly low, partly because of coverage issues and also the lower volume of available services, including the local commercial sector. Some audiences are concerned about a digital switchover which they don't feel ready for, or do not see the need for.
30. We welcome the build out plans for BBC network and Nations' services on DAB and the recent availability of BBC Radio Foyle on the platform. However, we note that, under current plans, coverage in Northern Ireland will still fall below the 97% threshold, which is an average across the UK. Coverage for BBC Radio Ulster/Foyle, which is the main way people here access BBC radio, will be lower than that for the BBC's UK-wide networks. We think that a government decision about digital switchover should take full account of audience needs and circumstances across the UK, including Northern Ireland. The BBC should deliver its commitments as they stand but, if the government proposes switchover in this Charter period, it would not seem fair to use licence fee monies to achieve this without audience approval.

How well is the BBC serving its national and international audiences?

31. BBC content is highly valued by the majority of people that we have spoken with, whose main concern is with sustaining its breadth and quality. However, there are also some groups who consume much less BBC content and receive less value for their licence fee.
32. As the Trust response to the Green Paper points out, there are particular issues for audiences in the devolved Nations. In Northern Ireland, audience reach is as high as the UK average but general impression and value for money scores tend to be lower, although there are some signs of improvement. Local services are highly popular but, on the whole, network services tend to perform less well than the UK average.
33. The feedback we have heard suggests that priorities for the audience in Northern Ireland include:
 - Investment in local services, which are central to the BBC's value proposition for local audiences and which build upon local expertise and talent
 - Enhanced portrayal and cultural relevance of network content
 - Meeting the needs of less well served groups, including younger audiences and some socioeconomic groups

- Meeting evolving audience needs for news - strengthening reporting of the devolved UK and reflecting the changes in Northern Ireland arising from the changing political, social and demographic context
- Demonstrating value for money
- Providing access to BBC services for all audiences in ways that suit their needs

Does the BBC have the right genre mix across its services?

34. Overall, we think that the BBC provides a very good range of genres across its services, and this is seen as central to its public service mission. There are areas of perceived strength, such as factual entertainment and natural history, whilst music and drama are also highly valued. TV comedy is often seen as an area where the BBC could do better, and some people think the BBC's performance compares unfavourably with the vibrant live comedy scene. It will be important to maintain and develop the range of comedy output across the channels, taking account of BBC Three's reinvention online. Radio comedy tends to be seen as stronger, although some observed that the appetite for archive programmes is telling.
35. There is an understanding amongst most audiences now that the BBC cannot, and should not, compete for high-end sports rights in the way it used to. However, this also impacts on the principle of universality and some believe there is a strong case to be made to protect more sports events for free-to-view services.
36. Recent cuts have reduced the breadth of genres on some services eg comedy on BBC Three and drama on Radio 3, and that has potential implications for the distinctiveness of these services. Local services are incredibly important to audiences in Northern Ireland and they would like to see more TV drama and comedy set here, whether broadcast on local or UK-wide services.

Is the BBC's content sufficiently high-quality and distinctive from other broadcasters? What reforms could improve it?

37. Audiences largely consider BBC services and programmes to be distinctive and of high quality.

"In my opinion the BBC is the best public service broadcaster in the world. It has raised the standards of all broadcasters in this country - take a look at the TV in other countries."

"There are just some programmes that I couldn't be without and you only get them on the BBC."

"Impartiality and accuracy are still the bedrock of BBC News. It needs to keep to these standards. I don't really believe a big new story until I hear it on the BBC."

"I really like historical dramas, you learn something and you get a good story."

38. We recognise that being distinctive *and* providing popular programmes will always be challenging, not least because other broadcasters will replicate successful formats. However, expectations are high and audiences are disappointed when programmes do not meet the standard. Popular mainstream programmes are valued as well as more niche ones, as long as they offer something different, and are of high quality. Audiences

also tell us that there is room for more creative risk-taking and innovation, even if not all ideas succeed.

How should the system of content be improved through reform of quotas or more radical options?

39. Audiences want programmes aimed at a UK audience to more fully and authentically portray Northern Ireland, its communities and culture. They also want to see a fuller portrayal of the diversity of life and cultures around the UK. This will only be achieved if there is a genuine diversity of content supply from across the UK.

"People need to see how they live their lives ..."

"Drama and comedy should acknowledge Northern Ireland's troubled past but equally it should not be the only topic, nor should the Troubles define us."

40. The Trust's Public Purposes tracking research⁵ clearly shows the gap between the importance Northern Ireland audiences attach to this and their view of the BBC's performance. We have been struck by how this issue has been raised spontaneously across almost every section of the audience, in connection with the range of services, but especially TV. We have also seen how positively audiences respond when better portrayal or relevance is achieved – for instance in response to locally set drama like *The Fall*, or BBC Northern Ireland's enhanced coverage of live events including Derry-Londonderry UK City of Culture 2013.

"The BBC has to be a good story-teller and reflect local people's lives."

"Use the talent in Northern Ireland more and show some of the humour and intelligence there is here."

"Network and local TV combine to give us a view of London/ the South East and Northern Ireland ... but we see much less of other parts of the UK such as Scotland, the Midlands etc. It's not so much Escape to the Country as Escape to Hertfordshire! We are interested in a much broader portrayal of the whole of the UK ..."

41. The network supply strategy endorsed by the Trust has significantly increased the spend on production in Northern Ireland in recent years, with some exceptionally high quality output. However, we are mindful that the strategy has not yet fully achieved the intended benefits of economic sustainability and enhanced portrayal of Northern Ireland for a UK audience.

42. The BBC's partnership with Northern Ireland Screen in 2015 has been a very positive recent development, with clear impact for the BBC, its audiences and the creative industries. We believe that the BBC should build on this partnership and use this success to inform other opportunities in Northern Ireland and beyond.

43. The system of content supply must be worked out in close collaboration with the industry across the UK. Our view, on behalf of local audiences, is that:

- the BBC must be supplied by content from a wide range of suppliers across the UK
- this should apply to all platforms, including radio and digital content
- interventions must be sufficient to deliver the benefits of economic sustainability in Northern Ireland, nurture local talent and lead to enhanced portrayal

⁵The Trust commissions Purpose Remits survey research every year to understand how well the BBC is performing against its Public Purposes :
http://www.bbc.co.uk/bbctrust/our_work/strategy/annualreport/2014_15.html

- there should be robust measurement of results and the BBC should be held rigorously to account for delivery
 - the partnership with Northern Ireland Screen should be continued and developed
44. Audience feedback suggests to us that enhanced portrayal, based on a diversity of content supply, is one of the areas which the BBC simply must address fully in the next Charter period to continue to be relevant to its audiences in an increasingly diverse devolved UK.

BBC funding

How should we pay for the BBC and how should the licence fee be modernised?

45. Audience feedback indicates that the mechanism for paying for the BBC should be universal and protect the independence of the organisation from political or commercial influence. There is wide support for the mechanism to be modernised to include catch-up viewing and this should be achieved as quickly as possible. It is in the audience interest – in terms of protecting services and getting most value from investment - that funding should track inflation.

"My main gripe with the licence fee is the people who get it all for nothing through the internet or whatever."

"The good thing about the BBC is that programmes are not interrupted by advertisements."

46. Although a part-subscription approach has some merit in allowing people to pay for what they use, there are practical considerations as there is not a consensus on what elements would be optional. Most importantly, it is at odds with a universal public service which the majority of licence fee payers want to see safeguarded in the next Charter period.
47. The household levy appears to have the advantage of raising more revenue, and some people see that as fairer. However, we are also concerned about adverse public reaction if it is seen as a move closer to government taxation.
48. We therefore suggest there are more benefits in retaining the licence fee at this point, providing it is modernised it to include all forms of consumption of BBC services. The BBC's focus should be on communicating more clearly what licence fee payers receive in return for their investment, and delivering even better value for money.
49. We – like many members of the audience – were very disappointed by the process of agreeing a licence fee settlement in July, 'behind closed doors'. We agree wholeheartedly that a new process which guarantees the rights of the audiences in a public process is required. Any process should fully protect the independence of the BBC and maximise value to the licence fee payer, for instance in allowing for long term planning.
50. Licence fee funding should not, in principle, be diverted to other uses which go beyond the audience's understanding of the BBC's role and remit or which might compromise its independence. Many sections of the audience are not aware of how their licence fee has been used to pay for services outside the BBC, such as local TV. They are, however, crystal clear that money taken for one purpose should not be used for other purposes without their consent. Given the experience to date we think it entirely appropriate that there are formal safeguards put in place to ensure that licence fee monies are not diverted to other uses, or, at very least, only where there is consent from those that pay.

Has the BBC been doing enough to deliver value for money? How could it go further?

51. There are particular value for money issues for audiences who are less well served by the BBC, and these need to be addressed in the next Charter period.
52. We cannot overemphasise the importance of perceptions of value for money to the audiences we speak with, including those who regularly consume and enjoy BBC services. We are very aware that perceptions of value for money in Northern Ireland tend to lag behind the UK as a whole. Any sense of waste, loose stewardship of funds or BBC arrogance in its use of other people's money is sorely felt. We repeatedly hear of licence fee payers' dissatisfaction, or anger, about senior management pay, talent pay and severance packages. It is telling that audiences also pick out smaller incidences of perceived waste – the reporter on location when a studio report in their view would be adequate, the number of staff reporting a single event etc. In most households and businesses every penny matters and the BBC should be seen to respect this in all it does.

"Remuneration for high-profile personalities is too high, especially when their whole career has been made by the BBC."

"The licence fee gives the BBC £10m a day to make programmes ... there is too much spent on executives and managers and not enough on programmes!"

53. Whilst audiences want to protect the value that they receive from the BBC, they do not necessarily think it should be immune to the pressure for savings felt by other organisations. They expect the corporation to respond creatively to continue to deliver value for audiences, albeit in different ways.
54. We are very mindful that many people are not aware of what services are paid for by the licence fee or how much BBC content they consume. The BBC's 'deprivation study'⁶ showed very clearly that audiences often do not realise the extent to which they use licence fee funded services and it also showed they usually have a more positive evaluation when this is clear. The BBC must do much more to effectively communicate what licence fee payers receive in return for what is demanded of them.
55. It is much more than a matter of raising awareness, however: the BBC also needs to show licence fee payers that it understands and respects the real impact of this additional cost on most households, especially as they see the fee as compulsory, regardless of how much BBC content they consume. When the tone is not right, the reaction can be very strong. For example, a number of people told us how angry they felt by messaging which described the licence fee in terms of its cost per day. It felt entirely disingenuous to them as household bills are paid monthly, and it is by no means an incidental cost.
56. We are aware that the BBC has delivered many improvements, independently assessed, in value for money over the last Charter period, particularly in areas which most frustrated audiences, such as senior management pay, talent costs and overheads.
57. Independent analysis indicates that this time the BBC can only deliver a proportion of its savings through further efficiencies, and services impacts are inevitable. In listening to audiences we have formed the view that 'salami slicing' across the services would impact very negatively on them, and a more strategic approach should be taken. It will be

⁶ <http://www.bbc.co.uk/aboutthebbc/insidethebbc/howwework/reports/deprivationstudy>

important to consult the audience on any proposals for substantive service changes, building on the Trust's consultation on British, Bold, Creative.

58. We remain mindful of the cumulative impact of cuts, following successive years of efficiency savings. It will be important to understand the investment required to continue to deliver high quality and distinctive services in the future, including areas such as research and development where the full impact of cuts may not be felt for some time.

Should the level of funding for certain services or programmes be protected? Should some funding be made available to other providers to deliver public service content?

59. As outlined above, we believe that it is vital that there is no more top slicing of BBC funds in principle. Audiences should be able to trust that the content and services that they value will not be diminished to pay for initiatives outside the BBC's role and remit.
60. We do not see the need for ringfencing of funds as the BBC's strategy should take full account of particular needs, such as market failure. Arrangements for governance and regulation should (as we believe they are now) be sufficient to ensure this is achieved, within the overall public interest. The BBC should deliver benefits to the industry, economy and wider society – as articulated in the proposed Public Purposes – and there is a range of ways in which this can be achieved. The important issue is that the BBC is challenged to deliver this part of its remit and rigorously held to account for this.

How should the BBC's commercial operations, including BBC Worldwide, be reformed?

61. Audiences have told us that that the BBC should make money from its programme assets, including foreign sales, provided the profits are all invested back in content. BBC Worldwide should continue to deliver these benefits and not be sold off. Value for money is a very significant concern among licence fee payers in Northern Ireland and every effort should be made to ensure that the BBC's commercial operations maximise benefits to the licence fee payer, within the BBC's public service remit. The audience will, in our view, be very alert to any signs that programmes made for them are unduly influenced by commercial considerations.

"Selling off BBC Worldwide makes no sense, it's just selling off a long term income stream for a quick one-off profit."

"Programmes should be made for the UK but if there is a way of making money from them by selling them overseas then the money from that should be ploughed back into the BBC to make more programmes."

BBC governance and regulation

How should the current model of governance and regulation be reformed?

62. We recognise that it is likely that arrangements for governance and accountability will change. We think it is vital that any changes reflect the primacy of the audience as the 'owners of the BBC' as well as the Public Purposes.
63. We believe that, if there is a unitary board, it should have a non-Executive chair and a majority of non-Executives and every safeguard against management capture.
64. It is vital that the interests of audiences in Northern Ireland are effectively represented at the highest levels of decision-making in both regulation and governance. A unitary board, if there is one, should have non-Executive representation from Northern Ireland

(and all the Nations), with a clear remit to represent local stakeholder and audience interests. There should be similar representation on the board of the regulator, with respect to its duties. This needs to be closely defined in roles and duties and fully resourced and supported to be effective. On a practical level, we are concerned that between two different boards there will be less access and impact for local views and issues than is the case under the Trust.

65. The government has recently announced a Memorandum of Understanding (MOU) between the BBC, DCMS and the Northern Ireland Executive. The MOU gives the Northern Ireland Executive a formal role in the Charter Review process and paves the way for the BBC Annual Report and Accounts to be laid in the Northern Ireland Assembly, and for committee scrutiny. We welcome these new arrangements, providing that the independence of the BBC from the Northern Ireland Executive and Assembly is always safeguarded. The BBC, like other news gathering organisations, has an important scrutiny role in relation to the political structures within Northern Ireland. It is essential that this is supported by a clear statement of what the BBC should deliver in Northern Ireland and a formal reporting process to show how the BBC has performed against this.

How could the BBC improve engagement with licence fee payers and the industry, including through research, transparency and complaints handling?

66. The BBC is paid for by licence fee payers and it is critical that it is run in their interests, that they have a say at every level and can see the influence that they have on decisions. It is right that the Charter Review process provides the opportunity to think in depth about how this can best be achieved. This confers a weighty responsibility for ensuring that any changes result in tangible improvements for audiences.
67. We think that listening to audiences is so important for the BBC as a unique institution that it is necessary to commit to high level mechanisms as well as duties in the Charter. No governance model will in itself be the answer – there need to be workable mechanisms in place. It would be disastrous for the corporation if, after all the criticisms of the current governance and regulatory structure, new arrangements for listening to audiences were no better. One practical concern is that, by leaving arrangements to new boards to devise, there will be a time lag as well as a learning curve. Audiences have high expectations and any new arrangements must be fully fit for purpose from Day One.

"It's not just engaging with audiences, it's listening to them. And if the BBC is listening this will be apparent through decisions and outcomes ..."

68. Meaningful engagement with audiences is not achieved by research and consultation alone, no matter how good the technology. There needs to be an independent voice for views which are not sought, or where the case needs to be developed and championed to have any impact in a massive organisation. Most of the audiences we have engaged with have never taken part in a BBC consultation or raised a complaint, and might be considered as consumers rather than citizens. However, by engaging with them on their own terms we found that there was a whole layer of views and issues that can and should inform decision making. It is important that this layer of listening and championing audiences is not lost, because this will be to the detriment of both parties.
69. Good listening is an in-built early warning system for the BBC. It is worth noting that neither portrayal nor reporting of the devolved Nations - both major issues in Charter Review - would have been on the Trust and management agenda at all without the insights and persistence of Audience Councils, drawing on direct conversations with

licence fee payers across the UK. And, of course, the Trust's willingness to listen to emerging issues.

70. Our experience tells us that any new mechanism for listening to audiences needs to be authentic, independent of management, very well informed, rooted in diverse communities, and passionate about speaking up for audiences, including those who are less well connected with the BBC.

How should the relationship between Parliament, Government, the National Audit Office and the BBC work?

71. The audience considers the BBC's independence sacrosanct, and all of these relationships should be carefully designed to protect this.

How should Public Value Tests and Service Licences be reformed and who should have the responsibility for making these decisions?

72. Public value tests and service licences, along with service reviews, have been effective tools for allowing audiences to have meaningful input into decisions about the services that matter to them. For example, decisions around BBC One +1 and 6 Music demonstrated how the public interest is upheld in decisions, whilst the rolling programme of service reviews helps to ensure that services are continuously shaped and developed to meet changing audience needs. It is vital that any new arrangements build on these strengths. Audiences should continue to have meaningful input to these decisions, through proactive engagement as well as self-selection.

Should the existing approach of a ten year Royal Charter and Framework Agreement continue?

73. We believe that it is in the audience interest to have a Charter of around ten years so that the BBC has the stability to plan ahead and deliver better value. The BBC's independence would be better protected if Charter renewal did not coincide so closely with the election cycle.

Part 2: Our response to management proposals in British, Bold, Creative

74. The BBC faces an unprecedented period of financial challenge, and massive changes in technology and consumption patterns. We have been very mindful of these factors in considering BBC management's proposals for the next Charter, noting the need to prioritise reduced resources and leave room for flexibility.
75. We have responded at a high level to the proposals, which tend to be outlined in broad terms, with some elements more developed than others. Key issues for us as representatives of the audience include:-
76. **Taking account of the audience:** It is important that management proposals for significant changes to services are fully developed in due course. There needs to be a clear framework for approvals, which includes audience input. The audience view on the proposals will also be informed by greater clarity on any possible service cuts, and how these are timed, which is not yet clear.

77. **Future-proofing:** There must be a very strong focus on future-proofing BBC plans, so that they can flex to meet changing needs and opportunities. The pace of change in technology and consumption patterns is likely to intensify beyond anything we have experienced to date.
78. Audiences will want to understand – and have a say in - any impact that reduced resources might have on research and development.
79. **The digital challenge:** There is a clear challenge, recognised by management, around ‘riding two horses at once’ to ensure that some audiences are not left behind as new digital services are developed. It is a critical balance, particularly with tight resources, and needs rigorous oversight. The BBC will have to make particular efforts to ensure that less well served audiences are not left behind, and that their voices are heard in decision making.
80. **Content:** Content is king for audiences and the management proposals seem weighted towards distribution in many areas, particularly for the Nations. Such proposals will only provide value for audiences if they are supported by the right level of high quality and distinctive content.
81. **Innovation:** The audience would like to see more creative risk taking and innovation in programme formats and content. We welcome the commitment to take more creative risks on BBC One and develop BBC Two programmes in terms of ‘how innovative and memorable they are, as much as their ability to drive audience share’. However, we would need to understand more about what this means, how it would be achieved and how performance could be measured.
82. **Partnership and enabling:** This section of the proposals has the potential to be transformative in terms of delivering benefits to wider society in Northern Ireland. The BBC can make its resources stretch further and share skills to build capacity and public value in communities and the industry. It will be important to understand more about how these aims will be achieved, and to ensure that it has impact locally (and in relevant ways), and not solely in London. This is about how the BBC works across the range of its activity as well as major initiatives. Plans for a new site for BBC Northern Ireland offer opportunities for creative collaboration that should not be missed.
83. **New and transforming services:** BBC management proposals identify a number of new services, such as iPlay for children, the Ideas Service and responsive radio. We agree that the BBC should look to the future of its services and keep pace with audience needs, and at headline level these proposals seem to offer potential benefits for licence fee payers. A rigorous approvals process, with the opportunity for meaningful audience input, will be necessary to ensure that full public value is realised.
84. We have considered the proposals for the devolved Nations in particular, from the perspective of audiences in Northern Ireland. Key themes are:-
85. **News:** Northern Ireland audiences have an especially strong appetite for news and so plans to strengthen news in the devolved Nations are of particular interest. Each Nation will have different needs - for instance, we do not think that there is the same drive here to adjust the balance of network to nation’s news as there is in Scotland. Audience concerns here relate more to editorial considerations - better reflecting a devolved UK on network news, keeping pace with the changing news agenda at a local level, and developing content online. These are themes which we will develop in our advice to the Trust’s current service review of Nations’ news and radio in early 2016. We would like to understand more, in due course, about plans for a Northern Ireland news home page and greater personalisation to reflect local interests.

86. Local consultation will be important, both with audiences and the industry, to ensure that proposals are relevant and deliver tangible benefits.
87. **An interactive digital service for Northern Ireland:** We think it is helpful to think about how local services can be developed to serve changing audiences needs and look forward to finding out more about this risk-taking proposal. The success of a new portal will depend on the range and quality of local content.
88. **Portrayal:** We welcome the prominence which portrayal of communities across the UK has in the Trust's response to the Green Paper as well as management proposals. We look forward to understanding more about plans and how the impact will be assessed. We think that the BBC would benefit from close engagement with audiences to hear their views about how this is developing.
89. **Learning needs:** We welcome the commitment to develop curriculum resources for each Nation. Students have told us about the extent to which Bitesize diverges from local curricula across many key subjects, leaving them much less well supported than their counterparts in England. We think that educational resources across the BBC have been lagging behind audience needs, particularly online, and this needs to be addressed in a strategic way with particular account taken of local needs and priorities. Informal learning opportunities across the range of age groups are at least as important and need to be part of a wider strategy.
90. **Indigenous minority languages:** Irish and Ulster-Scots provision is an important element of the BBC's service for audiences in Northern Ireland and the BBC should continue to support this. Provision should keep pace with changing needs. It is essential that the Irish Language Broadcast Fund and Ulster-Scots Broadcast Funds – both funded by DCMS and administered by Northern Ireland Screen - are renewed in 2016 to enable the BBC to continue to meet these audience needs.
91. **Funding:** We welcome the commitment to protect funding for the Nations, but are very mindful that this means they will be cut less than other areas rather than protected in full. We are also concerned that management proposals indicate that any increase in net investment for the Nations is dependent on the BBC achieving increases in revenue. Local services are very important for audiences in Northern Ireland - BBC network services underperform against the UK average and BBC Radio Ulster/Foyle has a huge following. There is a real danger that, on the back of extensive cuts in recent years, and without the economies of scale of larger services, audiences will be unduly impacted for relatively small amounts of money. It is important that savings are allocated strategically across services to ensure the Public Purposes are delivered and to address gaps. Thought should be given to how that can best be delivered in the Nations, for instance through devolution of more spending decisions. Northern Ireland should also have its fair share of capital investment, for instance through property plans.

BBC Audience Council Northern Ireland

December 2015