

Championing
excellence and diversity
in broadcasting

Founded in 1983 by Jocelyn Hay CBE



The Old Rectory Business Centre
Springhead Road, Northfleet
Kent, DA11 8HN

Tel: 01474 338716 email: info@vlv.org.uk
Fax: 01474 325440 web: www.vlv.org.uk

21 March 2016

Rt. Hon. John Whittingdale MP
Secretary of State for Culture, Media and Sport
Department for Culture, Media and Sport
100 Parliament Street
London
SW1A 2BQ

Dear John,

Re: VLV initial response to the Clementi Review of BBC Governance and Regulation

I am writing following the publication of Sir David Clementi's Review of BBC Governance and Regulation.

While we welcome and agree with the broad thrust of Sir David's conclusions and recommendations, we do have serious concerns about certain aspects and I wanted to set these out so that they might be taken into account in the final drafting of the White Paper.

- **Transparency:** The BBC Trust conducted valuable work in terms of its research and in particular consulting with audiences to an extent and depth that had not previously taken place. We are concerned that this valuable work should be continued in whichever governance and regulatory model the Government decides to adopt. This research should be available to all licence fee payers and put in the public domain.
- **Accountability:** Sir David's recommendation for a unitary board seems to have been largely accepted as the best model of governance. However he is not specific on how the Non-Executive Directors of such a board will ensure they are properly informed on the BBC Executive's delivery of the BBC's commitments. We would not want them to be reliant on the BBC Executive for evidence and would want the Charter to ensure that the Board is provided with adequate resources to commission their own research.

We also are concerned that there is little detail in the Clementi Review on how licence fee payers will be able to hold the BBC Board to account. As you may be aware, in our submission to the Green Paper, VLV supported the 'OfBeeb Light' model, with an external body to hold the BBC to account on behalf of licence fee payers. We still believe there is merit in this proposal, to ensure that the BBC's accountability is maintained.

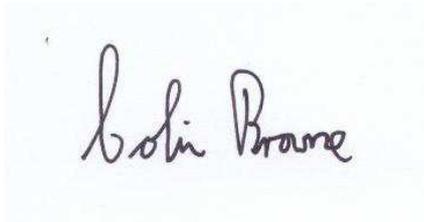
- **Independence:** Along with others whose views have been well covered in the press in recent weeks, VLV is concerned that BBC independence may be at risk if the majority of the members of the unitary board are Government appointees. We accept that the Government currently appoints the BBC Trustees and previously appointed the

Governors. However, in a unitary board the Non-Executive board members would be much closer to the Executive than is the case with the Trust or previously with the Governors. Therefore they would potentially be closer to influencing editorial decisions. This would reduce both the reality and perception of the BBC's independence from Government and be damaging to its worldwide reputation. At the very least, there should be complete transparency in the appointments process.

- **Regulation:** If Ofcom were to take over responsibility for all BBC regulation we would want Ofcom, as suggested by Sir David, to set up a separate unit for this activity. We agree that those who currently work for the BBC Trust with an expertise in qualitative analysis should be employed in such a unit to ensure continuity of the research base which has been established over the past nine years by the Trust.

As with many others, we keenly await the White Paper and send you our best wishes during your deliberations,

With best wishes and many thanks

A handwritten signature in black ink that reads "Colin Browne". The signature is written in a cursive style and is centered within a light blue rectangular background.

Colin Browne,
Chairman, Voice of the Listener & Viewer
Contact: colin@colinbrowne.com
01285 740433/07733 103800