



Information Policy & Compliance  
[bbc.co.uk/foi](http://bbc.co.uk/foi)

E Walgrove  
[Request-213xxxxxxxxxx@xxxxxxxxxxxxxxxxxxx](mailto:Request-213xxxxxxxxxx@xxxxxxxxxxxxxxxxxxx)

13 November 2009

Dear Mr Walgrove,

### **Request for Information – RFI20091436**

Thank you for your request of 17<sup>th</sup> October under the Freedom of Information Act 2000.

It may be helpful for me to explain that "TV Licensing" is a trade mark of the BBC and is used under licence by companies contracted by the BBC to administer the collection of television licence fees and enforcement of the television licensing system. The majority of administration is contracted to Capita Business Services Ltd, with cash related payment schemes contracted to Revenues Management Services Ltd ("RMS"). Over-the-counter services are provided by PayPoint plc. Marketing and public relations activities are contracted to the AMV Consortium. This consortium is made up of the following four companies: Abbott Mead Vickers BBDO Ltd, Fishburn Hedges Boys Williams Ltd, PHD Media Ltd and Proximity London Ltd. The BBC is a public authority in respect of its television licensing functions and retains overall responsibility.

In your request you asked a series of questions on TV Licensing's use of 0845 numbers, beginning with the queries below:

*'Please disclose (FOI Act 2000) all documents and notes on this matter' [TV Licensing use of 0845 numbers]*

While we are required to supply recorded information, except where that information is exempted under the Act, it has become clear to us that compiling this information would be a lengthy activity likely to take well in excess of two and a half days. This takes account of the wide-ranging nature of your request when 'all documents and notes' is interpreted literally.

Under section 12 of the Freedom of Information Act, we are not required to comply with a request if we estimate that the cost of doing so would exceed the "appropriate limit". The appropriate limit has been set (by the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004) as being £450 – equivalent to two and a half days work, at an hourly rate of £25. On that basis, we are declining to handle your request as currently framed. However, if you would care to narrow the scope of your request, so that it becomes possible to comply with it within the specified timeframe, we would be happy to revisit this response.

We are mindful of our duty (under section 16 of the Act) to provide reasonable advice and assistance to you, and specifically to advise how you might narrow your request so that it complies with the time limit. We are however concerned that, because the scope of your request as currently framed is so very broad and because we have no way of knowing (unless you wish to tell us) what your reason is for requesting the information, to provide such suggestions here might be counter-productive (i.e. it could be considered that



we are leading you toward a particular course of action or conclusion). Therefore on this occasion we are not offering you advice in this regard, but will be happy to consider your narrowed response.

Some of this information will be held by our contractors and some will not be held on our behalf, and therefore not covered by the Act, by virtue of section 3(2).

However, you may be interested to know the BBC Trust has recently completed a review of TV Licensing collection methods. The BBC Trust believes the core actions of licence fee collection are appropriate but has concluded that some aspects need improvement. These include changing our 0845 telephone numbers to 03 numbers, which will result in a saving for the majority of customers who choose to contact us this way. These telephone numbers will be changed from April 2010.

A copy of this review can be found at:

[http://www.bbc.co.uk/bbctrust/assets/files/pdf/review\\_report\\_research/tvl/tvl\\_report.pdf](http://www.bbc.co.uk/bbctrust/assets/files/pdf/review_report_research/tvl/tvl_report.pdf). Points 26 and 27, of the report may be of particular interest to you, and the following recommendation, number six.

*'Why TV Licensing use 0845 numbers?'*

In answer to your question, such numbers currently allow calls to be routed to one of the call centres operating in the UK at the same cost. The call centres located in Bristol and Darwen (near Blackburn) handle the vast majority of the telephone calls received by TV Licensing. The use of these telephone numbers allows calls from anywhere in the country to be routed to available advisors in either place and this enables the call to be answered quickly and by the most appropriate advisor thus saving callers substantial amounts of time. These numbers provide the best means of managing a call centre to enable callers to be quickly transferred to the appropriate agents in either of our call centres with the appropriate skill set to manage their call.

*'What is the equivalent geographical number?'*

The 0845 numbers do not have fixed equivalent geographical numbers as the numbers have call plans attached to them, which means that they have the following functionalities:

- Time of day routing – so calls can be diverted to different numbers dependent on the time the call is made;
- Queue managers – to answer calls automatically by the queue manager system and hold them in the networks when there are not enough resources to handle the calls;
- Call forwarding – providing for call diversion to another number when the lines are busy;
- Interactive Voice Responses – providing for calls to be answered by an auto attendant,

The only number for which an equivalent geographical number exists, is for the minicom number 0844 8006778, which is 0117 3021910.

Finally, I would highlight that phoning an 0844 or 0845 number is not the only way of contacting TV Licensing. Methods such as post and e mail can also be used, and these are set out on the TV Licensing website at <http://www.tvlicensing.co.uk/aboutus/howtocontactus.jsp>. Please note that contacting TV Licensing via the website is free of charge.

*'What revenue do TV Licensing receive per minute and in total from the use of 0845 numbers?'*

The BBC does not hold the information that you have requested in relation to revenue received by Capita. We do hold this information in relation to revenue received by RMS. However, I am withholding this under s43(2) of the Act.

The disclosure of this information would be likely to prejudice the commercial interests of RMS since the information you have requested relates to a contract which RMS hold with a separate provider (Telewest) for the provision of these services. RMS have negotiated the terms of these contracts, including the cost structures. Releasing this information would be likely to prejudice the ability of RMS to negotiate favourable terms in the future.

I am satisfied in terms of section 2(2) of the Act that in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information. I have considered the public interest test in the section on why information has been withheld below.

*'Are you aware of the revenue collected by your telecom provider, from your callers?'*

The BBC does not hold information about revenue collected by Capita's telecoms provider. The BBC holds information about revenue collected by RMS's telecoms provider, but for the reasons set out above, I am withholding this under section 43(2) of the Act.

*'Have TVL considered the revised COI guidelines? If so, what conclusions did you come to?'*

I can confirm that the information that you have requested is not held. However, the BBC Trust review details provided above will provide you with additional information.

*'Do you realise that all calls (local/national) cost the same?'*

This question is not a request for recorded information under the Act; however, the cost of the call would depend entirely on the phone supplier's tariffs.

*'Do you realise that 0845 numbers now offer no cost advantage to callers, irrespective of their location, only disadvantages? Are you aware of the cost implications to your callers, when using 0845 numbers?'*

These two questions are not a request for recorded information under the Act and I would like to refer you to the BBC Trust's recent recommendations.

## **Why information has been withheld**

I am required under s 2(2) of the Act to assess whether the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

The following factor is in favour of disclosure:

1. ensuring that public funds are being appropriately applied, that is:
  - a. ensuring that the TV Licensing system is being efficiently run; and
  - b. ensuring that value for money is being obtained.

I consider that the above public interest factor in favour of disclosure are served by the following:

1. The attached document *BBC TV Licensing Costs of Collection*
2. The fact that the BBC is required to satisfy the National Audit Office ('NAO') as to the value for money of the collection and enforcement arrangements and is accountable for the economy, efficiency and effectiveness of such arrangements. NAO's most recent audit is published at [http://www.nao.org.uk/publications/nao\\_reports/06-07/0607183.pdf](http://www.nao.org.uk/publications/nao_reports/06-07/0607183.pdf).
3. The fact that the BBC has reduced the cost of collection from 6.2% of the total licence fee collected in 1991/2, when it took over from the Home Office, to 3.6% for the financial year 07/08. This demonstrates that the TV Licensing system is being efficiently run. This and further related information is available in the BBC's *Annual Report and Accounts* (see [www.bbc.co.uk](http://www.bbc.co.uk)) and the *TV Licensing Annual Review* (see [http://www.tvlicensing.co.uk/pdfs/AnnualReview\\_en2008.pdf?r\\_exit\\_link=d\\_pdf\\_download](http://www.tvlicensing.co.uk/pdfs/AnnualReview_en2008.pdf?r_exit_link=d_pdf_download)).

There is hence a greater public interest in ensuring Capita manage call volumes efficiently on behalf of the BBC. I am therefore satisfied, in terms of section 2 of the Act, that in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest (outlined above) in disclosing the information.

### **Appeal Rights**

If you are not satisfied with this response you have the right to an internal review by a BBC senior manager or legal adviser. Please contact us at the address above, explaining what you would like us to review and including your reference number. If you are not satisfied with the internal review, you can appeal to the Information Commissioner. The contact details are: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, telephone 01625 545 700 or see <http://www.ico.gov.uk/>

Kind Regards

Catherine Graves  
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TV Licensing Management Team