

**Freedom of Information  
Internal Review decision**

Internal Reviewer	Jim McKenzie, Advisor – FOI and Contentious Data Protection
Reference	IR2016082 (RFI20161571)
Date	31 October 2016

**Background**

On 23 August 2016 the requester asked for the following information under the Freedom of Information Act 2000:

*For each of the years 2009-2015 please state*

- for each of the Channel Islands*
- the number of*

- (a) addresses recorded and held by TV licensing*
- (b) TV licences actually issued*

The BBC acknowledged the request on 24 August 2016 and provided its substantive response on 21 September 2016.

In response to (a), the BBC explained that it had interpreted this part of the request as meaning all addresses (residential properties, business and other premises) on the TV Licensing database with the postcode regions GY (Guernsey) and JE (Jersey), and provided the requester with the information it held.

In response to (b), the BBC explained that TV Licensing holds records relating to licences in force rather than licences issued. It also explained that it does not routinely publish these figures for any area smaller than the UK. The BBC confirmed that it did hold information relating to the number of licences in force at postcode level for the Channel Islands, and that it was withholding this information under s31(1)(a), (b), (d), and (g) and s31(2)(a) of the Act.

On 13 September 2016 the requester asked for an internal review:

*The BBC does not say how the information requested would provide information of use to those seeking to evade payment of the licence fee, and it is hard to imagine why the BBC might think this.*

*Accurate publication of such statistics as are requested, would, on the contrary, act to enhance payment of the licence fee.*

*It would show whether particular postcode areas (GY and JE) have above-average or below-average takeup of the licence.*

*And furthermore, it must always be remembered, in any event, that the fact an address or postcode does not have a licence does not mean that licence evasion is taking place - the address concerned may be non-residential, or it may be a residential address where no licence is required.*



*Accordingly, it is submitted, the purported reason for refusal is nonsensical and invalid. It is requested that following an internal review, the information be supplied as the law requires.*

### **The requested information**

Having reconsidered its response the BBC is prepared to disclose the requested information. Please note that TV Licensing records data relating to licences in force rather than licences issued.

#### ***Licences in force in the Channel Islands***

	<b>GY postcodes</b>	<b>JE postcodes</b>
2009	23,926	36,195
2010	23,611	36,122
2011	23,680	36,302
2012	23,544	36,429
2013	23,836	37,313
2014	23,907	37,264
2015	23,900	37,228

### **Appeal Rights**

I hope this further response satisfies your request. However, if you are not satisfied with the outcome of your 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 0303 123 1113 (local rate) or 01625 545 745 (national rate) or email [casework@ico.org.uk](mailto:casework@ico.org.uk).