



Information Policy & Compliance
bbc.co.uk/foi

Mr Hillas
Via email: request-130915-467fc739@whatdotheyknow.com

18th October 2012

Dear Mr Hillas

Request for Information – RFI20120993

Thank you for your request of 24th September 2012 under the Freedom of Information Act 2000 ('the Act') seeking the following information:

“TV Licensing @tv_l_info TV Licensing is in Basingstoke today speaking to the CAB about payment schemes and concessions. For more info visit <http://bit.ly/tvlgeneral> Expand Reply Retweet Favorite”

According to Tweets from one of TV Licensing TM's Twitter accounts, one of which is copied above, TV Licensing TM are regularly “speaking to the CAB” at various CAB in the UK.

This is a request under the Freedom of Information Act 2000 for full publication of all the presentation and other materials, past and present, used by TV Licensing TM when “speaking to the CAB” about matters relating to the tv licence and its enforcement.”

Please note 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 the administration of TV Licensing is contracted to Capita Business Services Ltd ('Capita'). Over-the counter services are provided by PayPoint plc ('PayPoint') in the UK mainland and Northern Ireland, and by the Post Office in the Isle of Man and Channel Islands. Marketing and printing services are contracted to Proximity London Ltd. Media services are contracted to Mediaedge:CIA International Limited ("MEC"). The BBC is a public authority in respect of its television licensing functions and retains overall responsibility.

Firstly, I should explain that TV Licensing is committed to making our information accessible to everyone in the community. We work with a range of organisations offering services to people across the UK, from community groups to larger national organisations, such as Age UK and the Citizens Advice Bureau (CAB).

As part of this work, TV Licensing conducts briefings with groups to provide them with information on TV Licensing and the opportunity to ask any questions they may have. These briefings also provide an update on any policy developments.

When TV Licensing is conducting stakeholder briefings, social media websites such as Twitter are used to alert other groups in the locality, many of which may be unaware of this service. Social media outreach is used to encourage other groups to contact TV Licensing if they have any questions on behalf of their clients, or to book their own briefing session.

Such presentations contain factual information about the many ways people can buy a TV Licence, the payment schedules available, and always provide the opportunity for group members to ask TV Licensing representatives' questions.

In view of the above, the only recorded information we hold relevant to your request is the enclosed copy of a Power point presentation document used by TV Licensing when briefing CAB offices.

Please note that I have redacted one parts of the presentation since in my view it is exempt under sections 31(1)(a), (b), (d) and (g) and (2)(a) of the Act which relate to law enforcement, specifically that disclosure would, or would be likely to, prejudice the prevention or detection of crime, the apprehension or prosecution of offenders, the collection of the licence fee and the BBC's ability to discharge its public functions in respect of such matters.

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 exemptions (in relation to sections 31(1) and 42 of the Act) outweighs the public interest in disclosing the information. I have provided further explanation of my consideration of the public interest test in the section 'Why information has been withheld' below. The redacted section has been shaded in grey.

Why information has been withheld

I am required under section 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 factors are in favour of disclosure:

1. Ensuring that the licensing authority is exercising its functions appropriately and proportionately; and
2. 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 factors in favour of disclosure are served by the following:

1. 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 on the NAO website at www.nao.org.uk.

2. The BBC has reduced the cost of collection from 6.2% of the total licence fee collected in 1991/2, when it took over this responsibility from the Home Office, to 3.4% for the financial year 2010/11. This demonstrates that the TV Licensing system is being efficiently run. This and further related information is available in the BBC's annual report (see www.bbc.co.uk) and the TV Licensing Annual Review (www.tvlicensing.co.uk/about/our-performance-AB6/). Please note that the Annual Review 2011/12 will be published shortly.

In addition, the following factors are in favour of withholding the information:

1. The BBC has a duty to enforce the television licensing system and it is essential that evasion is kept to a minimum.
2. Part of keeping evasion to a minimum is maintaining uncertainty as to TV Licensing's enforcement practices. This uncertainty contributes to the deterrent effect which is an important part of TV Licensing's enforcement strategy.
3. Without an effective deterrent to licence fee evasion, evasion would invariably increase. This would be to the detriment of the honest majority of people who are properly licensed and to the overall amount of revenue available to the BBC.
4. An increase in the rate of licence fee evasion would lead to an increase in enforcement costs and may lead to more prosecutions.
5. An increase in enforcement costs would lead to a decrease in the available funds to be put towards producing the BBC's content.

Appeal Rights

If you are not satisfied that the BBC has complied with the Act in responding to your request 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 under the Act 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

Rupinder Panesar

Freedom of Information Advisor, TV Licensing Management Team

