



Information Rights

bbc.co.uk/foi bbc.co.uk/privacy

Lucy Davies

Via email: request-471739-4cdc2c2c@whatdotheyknow.com

17 April 2018

Dear Lucy Davies

Request for Information – RF120180485

Thank you for your request of 16th March 2018 under the Freedom of Information Act 2000 ('the Act') seeking the following information:

"In view of your failure to respond to a request for an internal review of this request https://www.whatdotheyknow.com/request/licence_fee_evasion_modelling#outgoing-629708 I am writing to ask for more information.

British-Broadcasting-Corporation-Television-Licence-fee-Trust-Statement-for-the-Year-Ending-31-March-2016 indicates on page 4 that the evasion model is calculated as follows:

The Broadcasters' Audience Research Board (BARB) data on households using non-TV devices to watch television is combined by the BBC with the BARB estimate of "TV households" to arrive at a percentage of total households assumed to require a TV licence. This percentage is compared to the percentage of licensed households and the difference is assumed to be the rate of evasion with a very small adjustment for those legally licence free households who have notified TVL of their status and whom TVL has deemed to be innocent of law-breaking (for the time being, anyway) (So called NLNC).

*Given that, according to BARB, their data on TV households was revised to specifically INCLUDE TVs that are NOT used to receive live broadcasts** why did the BBC adjust its evasion model upwards in response to this change?*

(P6 of British-Broadcasting-Corporation-Television-Licence-fee-Trust-Statement-for-the-Year-Ending-31-March-2016 states:

"After restating the TV penetration rate for the change in BARB methodology, changes in customer behaviours and improvements in the evasion model, the calculated rate of evasion has increased to 6.2% in 2015/16 compared to the calculated rate of 5.0% in 2014/15. The changes in evasion are summarised in the table below.)

The licence evasion model, being based on BARB data, is based on statistical data about televisions not television receivers. Indeed, it specifically includes televisions that are not installed and used to watch broadcast TV and do not, therefore, require a licence.

Does the BBC not have a duty under the Charter to ensure that's its licence fee collection activities are "efficient, appropriate and proportionate"? I put it to you that your statistical model massively

overstates the true evasion rate and as a result your licence fee collection activities cannot possibly be "efficient, appropriate and proportionate".

Given that households owning a TV but not a TV receiver, who do not wish to have a relationship with BBC/TVL, are frequently at the sharp end of your aggressive, inappropriate, inefficient and disproportionate collection activities and are subject to harassment, threats and the presumption of guilt why does the BBC continue to base its behaviour on a statistical model that assumes every TV is a TV receiver and is therefore profoundly inappropriate?

*** "The definition of a working TV set changed at the end of 2015. Sets which respondents claimed had not been used to watch TV over the past six months and sets for which respondents could not specify the means of reception (cable, satellite, terrestrial, etc.) are now included in the definition." From <http://www.barb.co.uk/tv-landscape-reports/tracker-number-tvs/>"*

Please note that "TV Licensing" is a trade mark used 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, and by the Post Office in the Isle of Man and Channel Islands. Target Group ('Target') is the supplier for the Simple Payment Plan trial. Marketing and printing services are contracted to Proximity London Ltd. Media services are contracted to Media Planning Limited trading as Havas Media UK. The BBC is a public authority in respect of its television licensing functions and retains overall responsibility.

Please be advised that the Act gives a general right of access to all types of recorded information held by public authorities; and we are not required to create new information to respond to a request, or give a judgement or opinion that is not already recorded. Your email comprises a series of comments and queries, as opposed to requests for recorded information, and therefore falls outside the scope of the Act.

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 SK9 5AF. Tel: 0303 123 1113 or see <https://ico.org.uk/>.

Kind regards

Rupinder Panesar

Freedom of Information Advisor, TV Licensing Management Team

