

## RESPONSE

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I think there are two serious problems with Ofcom's proposed regulation of BBC impartiality:

1) At time of writing 9 of the 13 members of the Ofcom Content Board responsible for overseeing the BBC's impartiality are ex-BBC employees, [A]. This is untenable. The arrangement is comparable to the hypothetical scenario of suing someone for libel only to arrive at the court to find that most of the members of the jury are ex-employees of the accused. This would never happen, for good and obvious reasons. In my opinion those charged with judging the BBC's impartiality should be people with no previous employment at the BBC, and their judgments should not be subject to review by ex-BBC employees anywhere in the Ofcom management chain.

2) The Ofcom employees charged with judging the BBC's impartiality should not be based in London. Arguably BBC News has to be in London so as to be close to Westminster. However, as we saw in the EU referendum, the politics of London are very different from those of most of the rest of the country. Given that the BBC is supposed to be the British Broadcasting Corporation, not the London Broadcasting Corporation, and given that the BBC receives most of its license fee funding from outside of London, the rest of the country is entitled to a say in whether the output of the London based BBC News is impartial. In my opinion those charged with judging the BBC's impartiality should be based in towns and cities (yes, plural) outside of London whose voting patterns, either individually or in aggregate, reflect the voting patterns of the nation as a whole. The individuals hired should be similarly screened to ensure that their political opinions, in aggregate, reflect the same.

This latter point on diversity of political opinion might well be applied to the BBC itself:

In 2012 the Guardian reported that a freedom of information request had revealed that the BBC's most purchased newspaper was... the Guardian, with 59,829 copies purchased over an 11 month period in 2010-11, [B]. This needs to be put into context. In 2010 The Guardian had just 14.5% of the circulation of the broadsheet newspapers : Guardian 14.5%; Telegraph 33.3%; Times 24.5%; Financial Times 18.8%; Independent 8.9%, [C]. The BBC appears to be disproportionately fond of the Guardian.

A letter in the Telegraph in 2010 reported that another freedom of information request had revealed that in 2004 the BBC spent the following sums (in pounds) on advertising for staff recruitment : in the Guardian, 231,944; in the Telegraph, 32,535; in the Times, 6,159, [D].

This evidence suggests that staff ratios at the BBC may be skewed in favour of Guardian readers, and that BBC staff recruitment may have historically favoured Guardian readers. If so, this distortion may go a long way to explain why the BBC is now viewed by some as the "Broadcasting arm of the Guardian", [E,F,G].

In my opinion the BBC, and BBC News in particular, should be required to ensure that the statistical distribution of political views held by its employees reflects the statistical distribution of political views held by the nation it serves. Ofcom should ensure that this happens. Only when the distributions match, not just in mean, but also in shape, variance, kurtosis, and especially skewness, will the BBC be able to consistently produce impartial material.

- [A] <https://tinyurl.com/mrs3y2s> (ofcom.org.uk)
- [B] <https://tinyurl.com/17tmow8> (theguardian.com)
- [C] <https://tinyurl.com/jfs6z25> (wikipedia.org)
- [D] <https://tinyurl.com/lcawcea> (telegraph.co.uk)
- [E] <https://tinyurl.com/lh3qoqq> (biasedbbc.org)
- [F] <https://tinyurl.com/37zyyfh> (bbc.co.uk comment 12)
- [G] <https://tinyurl.com/kf4mzvy> (express.co.uk comment 2)