

## Consultation response form

Please complete this form in full and return to [bbcregulationreview@ofcom.org.uk](mailto:bbcregulationreview@ofcom.org.uk)

<b>Consultation title</b>	How Ofcom regulates the BBC – a review
<b>Full name</b>	Sammy Stein
<b>Contact phone number</b>	[X]
<b>Representing (delete as appropriate)</b>	Self
<b>Organisation name</b>	
<b>Email address</b>	[X]

## Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

<b>Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.</b>	Nothing
<b>Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.</b>	None
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	Yes

## Your response

<b>Question</b>	<b>Your response</b>
<b>Question 1: Do you agree with the proposed scope of the review of BBC regulation as set out in this document? If not, please explain the areas where you think changes should be made.</b>	<p>Mostly Y</p> <p>The plan to include the regulation of online services in the Licence is extremely important and should include all BBC websites especially BBC News.</p> <p>The BBC News website is of particular importance as it is presented as 'permanent public record' and 'historical record' and not</p>

	<p>only does it have a domestic audience but also global audience.</p> <p>It would also be critical for OFCOM to regulate the BBC's foreign language services. These platforms often fall short of agreed BBC editorial standards.</p> <p>It should be noted that when reviewing BBC Arabic, the Corporation is not always sufficiently aware of the standard of content being produced in its name.</p> <p>Although the foreign language services are run by the BBC World Service, they can also be heard by UK audiences and their content is all too often not compatible with the Public Purpose of "social cohesion and wellbeing of the United Kingdom".</p> <p>As an example a programme in the 'Our World' series that was broadcast on the BBC News Channel and the BBC World News Channel under the title "Working for the Enemy" and presented by Murad Batal Shishani promoted clips from a video produced by Hamas, internationally known and recognised to be a terrorist organisation.</p> <p>Although the new BBC Director General committed himself to tackling the issue of impartiality on social media accounts held by BBC employees, this does not seem to be upheld by the BBC especially among those in foreign language departments.</p>
<p><b>Question 2: Do you agree with the proposed approach to reviewing the BBC Operating Licence? If not, please explain why.</b></p>	<p>Y</p>
<p><b>Question 3: Do you have any views on how to measure the BBC's performance?</b></p>	<p>N</p> <p>I believe that the BBC and OFCOM should adopt the IHRA working definition of antisemitism in</p>

	<p>order to measure - and improve - the BBC's performance</p>
<p><b>Question 4: Do you agree with our proposed scope of the review in relation to content standards? If not, please explain why.</b></p>	<p>N</p> <p>My view is that the BBC complaints procedure is not fit for purpose and is flawed from the public's perspective. My personal experience has been that the outsourced handling of complaints at Stages 1a and 1b is designed primarily to rebuff complaints regardless of their validity.</p> <p>I am aware of several cases in which complaints rejected at Stages 1a and 1b were subsequently upheld by the ECU and such cases inevitably undermine public trust in the BBC's complaints procedure.</p> <p>I would contend that there has been a marked decline in standards of handling complaints since 2019. It is curious and puzzling that the BBC was prepared to state that the failure to handle complaints in a timely manner was due to a 'high volume of complaints'.</p> <p>This was followed by a claim that the Covid Crisis led to a further deterioration.</p> <p>While the pandemic undoubtedly created challenges, it would be reasonable to expect the BBC to have found solutions which would enable it to provide the public with the service they public is funding: an efficient complaints system.</p> <p>I believe that the BBC complaints procedure's timeframe is unduly long and not conducive to the system's ostensible aim - the quick and efficient correction of editorial complaints in order to meet the BBC's own editorial guidelines and public purposes. The process associated with corrections lacks consistency. Footnotes are sometimes added to corrected articles on the web-</p>

	<p>site and sometimes not. The same applies to recordings available on BBC Sounds and iPlayer. It would make sense to have a dedicated corrections page to the BBC News website where readers can see if an article they have already read has been amended. Corrections would be more visible and accessible with a dedicated corrections page. and this would increase the likelihood that people will receive the corrected information. This will greatly contribute to the BBC's transparency as well as reducing the likelihood of waste of public funding on unnecessary complaints. Furthermore, the procedure for informing the public that corrections have been made to content should be standardised across all platforms and not left to the decision of individual producers and editors.</p>
<p><b>Question 5: Do you agree with the issues we have identified with the processes for assessing the competitive impact of changes to the BBC's UK Public Services? If you consider there should be changes to these processes, please set out what these are and, if possible, provide any relevant evidence.</b></p>	<p>Y</p>
<p><b>Question 6: Do you have any concerns about the regulatory framework for the BBC's commercial activities that are not being considered in the review of BBC Studios?</b></p>	<p>N</p>

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