

Question 1: What are your views on Ofcom's proposed procedures for:

· consideration and investigation of breaches of content standards on BBC broadcasting services and BBC on-demand programme services;

· consideration and adjudication of Fairness and Privacy complaints on BBC broadcasting services and BBC on-demand programme services; and

· consideration of sanctions for breaches of content standards on BBC broadcasting and BBC on-demand programme services?

1. The complaints process must give the BBC a maximum 6 months to resolve the complaint to the satisfaction of the complainant.
2. The process must publish what action was taken to rectify the complaint, when and by whom.
3. If a complaint has not been satisfactorily resolved by the BBC 6 months from receipt, management of the complaint and full authority for recommended action will revert from the BBC to Ofcom.
4. Clear, easily accessible and unambiguous statistics must be provided on a monthly basis to show total complaints received by the BBC, total complaints upheld, and total complaints rejected at each stage. This should also show number of complaints that have exceeded the 6 month limit, and provide similar information for those that have reverted to Ofcom.

Question 2: Please provide reasons for your views.

The BBC's current complaints process suffers from lack of independent scrutiny, slow response, a 99.99% rejection rate, and failure to properly rectify and publish the correction.

1. Under a Freedom of Information Request the BBC disclosed that over a 5 year period from 2008-13, of nearly 1.2 million complaints received, it upheld only 166 at Stage 2, a rejection rate of 99.99%. The BBC upheld only 30 complaints at stage 3, the BBC Trust. (Documentation available if required).
2. It can typically take 2 1/2 years to take a complaint to the BBC Trust.
3. The BBC Trust acts as both champion for the BBC and final arbiter of complaints - a clear conflict of interest, lacking independence.
4. Should the complainant be successful, the BBC has the final say over its rectification. This decision is normally left to the BBC editor who was 'at fault', a clear conflict of interest.