

## Freedom of Information Act 2000 (Section 50)

### Decision Notice

**Date: 4 October 2007**

**Public Authority:** British Broadcasting Corporation (BBC)  
**Address:** MC3 D1,  
Media Centre,  
Media Village,  
201 Wood Lane,  
London,  
W12 7TQ

### Summary

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The complainant requested a breakdown of the average viewing figures of every BBC Wales generated programme during 2004. The BBC refused to disclose the requested information on the basis that it was held for the purposes of journalism, art or literature. The Commissioner disagrees with this position finding that the requested information is held for purposes other than journalism, art and literature. However he has considered whether the information is exempt from disclosure for other reasons and finds that section 43 of the Act is engaged and that the public interest favours maintaining the exemption from disclosure.

### The Commissioner's Role

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1. The Commissioner's duty is to decide whether a request for information made to a public authority has been dealt with in accordance with the requirements of Part I of the Freedom of Information Act 2000 ('the Act'). This Notice sets out his decision.

### The Request

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2. On 4 January 2005, the complainant made a request to the BBC for
  - (a) An individual breakdown of the average viewing figures for every BBC Wales generated programme during 2004
  - (b) details of the average daily audience of BBC2W
  - (c) the cost of running the channel
  - (d) the number of homes in Wales able to receive the BBC2W, and
  - (e) the number of licence payers in Wales

3. The BBC responded on 21 January 2005. It advised the complainant that his request for the requested information was *“outside the scope of the Act because information about BBC programmes, content and their production is not covered by the Act”*
4. However, the BBC provided the complainant with the following information in relation to requests (c), (d) and (e):
  - *“the BBC Wales Annual Review 2003/04 makes reference to the number of people who watch BBC 2W each week. This figure stands at 250,000...”*
  - *“output on BBC W in 2003/04 totalled 182 hours at a cost of £39,000 per hour giving a total cost of £7.0 million. £4.6 million of this figure relates to output that originated on BBC 2 W before being broadcast on BBC One Wales”*
  - *“...68 per cent of people in Wales now have digital TV at home. All but small proportion...[have] access to 2W”*
  - *“...figures...indicate that 1.19 million households in Wales hold a current television licence. However not all are licence fee payers. Households where a person aged 75 or over is resident qualify for a free TV licence. Other regulations govern second homes, residential homes, hotels...or special situations”*
5. On 31 January 2005, the complainant then made a request to the BBC for an internal review of its decision not to provide him with the information requested under (a) and (b).
6. On 11 March 2005, the BBC confirmed the internal review had taken place. The review was conducted by the Director, Global News Division who upheld the original decision not to provide the information on viewing figures, see (a) and (b), requested by the complainant.

## The Investigation

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### Scope of the case

7. On 5 May 2005 the complainant contacted the Commissioner to complain about the manner that his request for information had been handled. The complainant specifically asked the Commissioner to consider whether the information he requested had been correctly withheld.
8. The complainant argued that disclosing the requested information was of *“public interest to viewers across Wales because, as licence fee-payers, they should have a right to see information on viewing figures of programmes made in Wales...this is even more crucial as licence fees fund the BBC”*. In addition the complainant states that he cannot accept the BBC's reliance on the Schedule 1

derogation as '*some considerable information is already publicly available.*' This decision notice will consider the BBC's reliance on the Schedule 1 derogation in relation to (a) and (b). The complainant did not specify that he was unhappy with the BBC's response to (c), (d) and (e) and therefore the Commissioner has not considered these elements of his request any further.

## Chronology

9. On 9 June 2005, the Commissioner wrote to the BBC and requested further arguments in support of its refusal to provide the complainant with access to the requested information.
10. The BBC responded to the request on 27 July 2005. It advised that television viewing figures are used by programme makers and held by the BBC to support the production of its programmes.
11. The Commissioner issued a Preliminary Decision Notice (PDN) on 7 November 2005. In the notice, the Commissioner informed both parties that he was inclined to issue a Decision Notice that would state:
  - viewing figures are not held for the purposes of journalism, art or literature
  - In the particular circumstances of this case, the BBC is a public authority under the Act; and the BBC should now deal with the information request within the scope of the Act.
12. The Commissioner provided in the PDN the reasons for his provisional view on the complaint. The PDN invited the parties to make further submissions to the Commissioner.
13. The BBC provided its response to the PDN on 9 December 2005 and provided further arguments to support its assertion that the Act did not apply to the viewing figures. In addition, and without prejudice to its assertion, the BBC provided alternative arguments under the Act and cited the exemptions under sections 41 and 43(2) of the Act.
14. On 7 April 2006, the BBC provided further arguments to support its decision not to disclose the information requested by the complainant.
15. On 12 June 2006, the Commissioner informed the complainant of his decision to suspend making a final decision on the complaint because of the Information Tribunal's imminent consideration of an appeal which would have an impact on his complaint.
16. In a telephone conversation on 23 February 2007, a member of the Commissioner's staff asked the BBC for further information on the Marketing Communications & Audiences division. The BBC also confirmed that at the time of the complainant's request it did not hold the requested information for purposes other than journalism art and literature.

17. The Commissioner has not felt it necessary to view the requested information because in this case the request is sufficiently specific and detailed that the individual nature of each piece of information sought by the complainant is clearly and readily apparent by consideration of the wording of the request itself.

## Analysis

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### The Schedule 1 derogation

18. Part VI of Schedule 1 of the Act states that the BBC is a public authority 'in respect of information held for purposes other than journalism, art and literature'. This is commonly referred to as the Schedule 1 derogation. Similar provision exists in relation to Channel 4 and S4C – as a group these organisations are called public service broadcasters (PSBs).
19. In order to determine the purpose for which information is held the Commissioner will apply a dominant purpose test. This means that where information is held for a number of purposes he will weigh these purposes against each other to determine the dominant purpose for which that information is held.
20. In this case it is clear that the BBC hold the requested information. It has been established that the information is provided by the Broadcasters' Audience Research Board Limited (BARB), a not for profit organisation funded by the major UK broadcasters (BBC, ITV, Channel 4, Channel 5 and BSkyB) and the Institute of Practitioners in Advertising (IPA). See [www.barb.co.uk](http://www.barb.co.uk) for further information. Other information on audience reaction to a programme is also available, known as appreciation index figures, and similar research is conducted on radio listening habits.

### The BBC's view

21. The BBC believes that the Schedule 1 derogation applies broadly and that its scope includes information such as programme content but also extends to include multi-purpose information, such as audience research data. The BBC consider that the dominant purpose for holding information is the critical factor in making a determination on whether information is held for the purposes of journalism, art and literature, or some other purpose.
22. In its letter of 27 July 2005, the BBC has stated that it uses viewing figures "*to learn more about [its] audience and inform current and future programme making.*" It considers that the requested information was held for the dominant purpose of supporting BBC content and output, and therefore was not covered by the Act.
23. In the same letter the BBC went on to say "*Television viewing figures are used by programme makers and held by the BBC to support the production of our programmes... Programme makers use viewing figures to learn more about their*

*audiences and inform current and future programme making. Viewing figures influence the commissioning, scheduling and production processes.”*

24. In its letter of 9 December 2005, the BBC confirmed its position to be ‘we consider that BARB data is held by the BBC to support our programmes and is integral to the creation, production and commissioning, and re-commissioning, of BBC content.’
25. In the same letter the BBC go on to state ‘we consider that BARB data does have a “direct input” into programme making ... BARB data is used to analyse programming on a minute by minute basis, comparing every element of a programme with the BARB ratings for that element. This gives us an understanding of whether the creative impact we were aiming for has been achieved, and if not, enables us to rethink how to achieve that impact. For some genre, such as social action campaigns, this sort of creative use of BARB data is essential to ensure the campaign has the intended effect on, for example, literacy or obesity.’
26. The Commissioner understands that the primary users of viewing figure information are members of the Marketing, Communications and Audiences (MC&A) group of the BBC. By letter of 27 February 2007 the BBC explained that MC&A’s position ‘is at the heart of the BBC, and reflects the fact that everything starts with audiences. The teams in this group are responsible for playing a key creative role in bringing, at the earliest stages, audience research and marketing into programming and commissioning. The main focus of the division is audiences, being the voice of the BBC to the people who use its services and being the conduit for audience opinion and response back to the BBC.’ The diagram in the Annex illustrates the current BBC structure and how different groups fit together.
27. The BBC confirmed in its letter of the 26 February 2007 that for these reasons they consider that the requested information ‘was held for the dominant purpose of supporting BBC content and output, and is therefore not covered by the Act.’

### **The complainant’s view**

28. The complainant disagrees with the BBC’s position. In his letter to the Commissioner dated 5 May 2005, the complainant states that: “The release of the information requested is of public interest to viewers across Wales because, as licence fee-payers, they should have a right to see information on viewing figures of programmes made in Wales, particularly as some are already published. This is even more critical as licence fees fund the BBC. The BBC’s refusal letter points to the Freedom of Information Act having a clear derogation relating to information covering “journalism, art or literature”... I cannot accept the assertion that this extends to audience information because, as stated above, some considerable information is already publicly available.”

## The Commissioner's view

29. The Commissioner has noted the arguments put forward by the BBC and the complainant.
30. In the Commissioner's view the purpose of the Schedule 1 derogation is to protect journalistic, artistic and literary integrity and to preserve a creative space in which programme makers can continue their core activities free from outside interference.
31. Viewing figures are statistics obtained by the BBC from BARB. BARB monitors the viewing habits of television viewers and provides this information to their customers, including members, subscribers and other organisations.
32. The Commissioner accepts that viewing figure information has a role to play in the creative process as described by the BBC. It is the Commissioner's view that viewing figure information will feed into the creative process and may impact on decisions taken by programme makers. A key part of an organisation's work is obtaining feedback on services provided, reflecting on feedback, and making informed decisions about the quality, in its widest sense, of the services provided and how to improve those services. Viewing figure information is one way that the BBC measures an audience's reaction to a programme and, whether alone or combined with other feedback, this is then used to inform decisions about programme making. It is also clear that viewing figure information is not necessarily the defining factor in decisions made by programme makers but one of a multitude of considerations.
33. Viewing figure information also serves other purposes which are not as closely related to the creative process.
34. By way of background, the BBC is incorporated by Royal Charter, at the time of the request the 1996 Charter was in effect but at the time this notice is served the 2006 Charter is in effect. In addition to the 1996 Charter the BBC is subject to an Agreement with its sponsor department, in this case the relevant department at the time of the request was the Department for Culture Media and Sport, and the BBC was subject to the Amended Agreement of 2003 (2003 Amended Agreement). For further information on the Charter and Agreement please see the Legal Annex.
35. The BBC Board of Governors are required, by the 1996 Charter and 2003 Amended Agreement, to set objectives for the corporation. In 2005 there were six objectives:
  - Journalism and impartiality
  - Creativity and ambition
  - Charter review
  - Driving digital
  - Value for money
  - The BBC's global role



36. In the Commissioner's view the relevant objective here is value for money; it is evident that a key measure of value for money is 'reach'. According to the BBC's Annual Report for 2006-7 'reach' is a measure of the percentage of people who use, view or listen to a given service over a given period of time. When combined with the amount of money spent on a particular programme or service, for example BBC1, this gives a measure of that programme's value to license fee payers as a whole. The BBC's 2004/5 Annual Report publishes the reach of the BBC's television broadcasts on a channel by channel basis, demonstrating the importance of this factor in measuring value for money.
37. The BBC's 2005/6 Annual Report is helpful in understanding how value for money is monitored at the BBC. The 2005/6 Annual Report states that 'Value for money' is primarily an empirical financial assessment measured in two ways. One is to divide the total cost of a programme or other output by the number of viewers, listeners etc. to provide a cost per user. The second way is to divide the total number of viewing or listening hours by the total cost to produce a cost per viewer/listener hour. Audience perceptions are also taken into account here.
38. In the Commissioner's view the measurement of success in delivering the BBC's objectives is a managerial activity. The pursuit of these objectives is part of the wider strategic environment within which the BBC operates. Together with licence fee income come public responsibilities and purposes which, if the BBC is to achieve, it must measure. Audience viewing figures are a key mechanism by which the BBC's Executive Board, and in turn the Board of Governors, can monitor their success. This demonstrates that there are operational purposes beyond those of journalism, art and literature.
39. Comments made by the BBC in a letter to the Commissioner of 9 December 2005, support this analysis. The letter states that "*The Board of Governors [since replaced by the BBC Trust] has access to BARB.....and scrutinises it as part of the performance review process. Audience Research data is used by Divisional Directors to report performance against objectives.*"
40. It is the Commissioner's opinion that viewing figure information serves a number of purposes, these purposes are outlined below:
- It is used by programme makers to make decisions about programme commissioning and content.
  - It is used by BBC management to monitor the BBC's performance in terms of value for money.
  - It is used by BBC management to monitor the BBC's reach, and therefore its success in achieving its most basic objective – delivering content to the public.
  - It is used by the Board of Governors (now BBC Trust) to measure performance.
41. Viewing figure information does have a bearing on the creative process and is used by programme makers. However, on balance, the information has more management applications than creative and is a key measure of performance. Therefore, having considered the nature of the information, the purposes for which this information is held, its relationship to strategic obligations and goals,

and its relationship with the creative process, the Commissioner's view is that the dominant purpose for which this information is held is other than journalism, art and literature.

### **Exemptions**

42. The BBC provided additional arguments, without prejudice to their position on the Schedule 1 derogation, as to the exemptions on which it would seek to rely in the event that the Commissioner found that the Schedule 1 derogation did not apply in this case. These were sections 43(2) and section 41.

### **Section 43 – Commercial interests**

43. Section 43(2) states that where disclosure of the requested information would prejudice the commercial interests of any person it is exempt information. However section 43 is a qualified exemption and therefore the public interest test detailed under section 2 of the Act must be applied. Therefore the Commissioner must first consider whether disclosure would prejudice the commercial interests of any person and then, if prejudice would exist, consider whether the public interest favours maintaining the exemption.

### **Would disclosure of viewing figure information prejudice the commercial interests of any person?**

44. To establish whether disclosure of this information would lead to a prejudice of commercial interests it is necessary to understand the market within which BARB operates. It has been established that the information is provided by the Broadcasters' Audience Research Board Limited (BARB), a not for profit organisation funded by the major UK broadcasters (BBC, ITV, Channel 4, Channel 5 and BSkyB) and the Institute of Practitioners in Advertising (IPA). See [www.barb.co.uk](http://www.barb.co.uk) for further information.
45. BARB is funded via subscriptions and tariffs charged to persons wishing to obtain information on the number of people viewing a television programme. Some information is published and can be used by any person accessing their website. Some information is published by subscribers. However, more detailed information is only available on the payment of a fee to BARB or through an intermediary which provides viewing figure information under license.
46. BARB subscribers pay an annual registration fee of £5420 plus a quarterly subscription fee or license appropriate to their category of business. Any shortfall in the costs of running BARB is met by the shareholders, see para. 44. In 2005 approximately 40% of the running costs of BARB were met through subscriptions.
47. The BBC contend that, despite being a not for profit company, BARB does have commercial interests. They state that the majority of its shareholders are commercial organisations operating for profit and that were the Act to require disclosure of the requested information the funding model under which BARB operates would be jeopardised. The BBC contends that Sky, ITV, Channel 5 and



the IPA would be likely to seek compensatory payments from the BBC and Channel 4.

48. The BBC accept that BARB does not have any competitors in the UK market. They state that the value of the audience measurement contracts is £60 million over five years, BARB awards four contracts which go to make up the BARB service and these are put to competitive tender regularly. The next competition will take place in 2010.
49. In the Commissioner's view it is likely that prejudice to BARB's commercial interests would be a consequence of the disclosure of this information under the Act. BARB provides viewing figure information for a price, which is paid in a variety of ways, if this information were to be made available free of charge via BARB's customers then there would be little interest in BARB continuing to collect and make available this information.
50. In the Commissioner's view, to mitigate the arguments put forward in favour of commercial prejudice, it could be argued that to only disclose viewing figures in relation to BBC Wales would not jeopardise the commercial interests of BARB overall. This is because BARB would still be able to operate commercially in relation to other viewing figures: those in relation to ITV, Sky, Channel 4 and the rest of the BBC network. This argument is tempered by the likelihood that the disclosure of viewing figure information about the rest of the BBC networks and Channel 4 would follow from a decision that no prejudice would arise in relation to BARB's commercial interests in this case.
51. In addition it is possible that, were disclosure to occur in this case, other shareholders in BARB would seek compensation from the BBC for breach of contract thereby prejudicing the BBC's own commercial interests. The likelihood of this happening is difficult to gauge but it is probable that the BARB would seek to defend its commercial position through legal action against the BBC for breach of contract.
52. On this basis the Commissioner is satisfied that the exemption under section 43(2) is engaged and will move on to consider whether the balance of the public interest favours maintaining the exemption.

### **Public interest test**

53. Section 2(2) of the Act states that information is exempt information where the public interest, in all the circumstances of the case, in maintaining that exemption outweighs the public interest in disclosing that information.

### **The BBC's view**

54. The BBC concedes that there is a public interest in the corporation being accountable to licence fee payers. They accept that viewing figure information is a measure of the reach and, to an extent, quality of output. However they maintain that this interest is already served by the accountability mechanisms followed internally. The Performance Accountability framework, monitored by the

then Board of Governors (now the BBC Trust), is a key part of this and audience viewing figures are scrutinised by the Board of Governors as part of their performance review.

### **The complainant's view**

55. The complainant has stated the following in relation to the BBC's decision to refuse access to the information requested on the grounds of the Schedule 1 derogation:

*"The release of the information requested is of public interest to viewers across Wales because, as licence fee-payers, they should have a right to see information on viewing figures of programmes made in Wales, particularly as some are already published. This is even more critical as licence fees fund the BBC. The BBC's refusal letter points to the Freedom of Information Act having a clear derogation relating to information covering "journalism, art or literature"... I cannot accept the assertion that this extends to audience information because, as stated above, some considerable information is already publicly available."*

### **The Commissioner's view**

56. In the Commissioner's view there is a public interest in license fee payers having access to information about the ability of the BBC to reach its audience. Information about the number of viewers who watch a programme can be used to inform judgements about the quality of the BBC's content. Television viewers who are resident in the United Kingdom must pay the licence fee, with minor exceptions, and it follows from this that the BBC must try to meet the expectations of the people who fund its operations. One way in which people can assess whether the BBC is a successful public service broadcaster is by knowing how many people watch its programmes. A disclosure of this information would facilitate this and serve the public interest.
57. There is a further public interest in assessing the value for money that the BBC provides; viewing figure information would facilitate this if accompanied with programme costs information. However programme costs information was not requested here and is not directly relevant to the circumstances of this case and therefore this factor does not weigh heavily in favour of disclosure.
58. The Commissioner also recognises that there are strong arguments in favour of maintaining the exemption under section 43(2).
59. In the Commissioner's view it is in the general public interest that the BBC delivers good value for money, this is because television viewers do not have a choice about whether to pay the license fee. In order to deliver good value for money the BBC needs access to authoritative viewing figures about the programmes it broadcasts in order to judge value for money and therefore make well informed decisions. This is explained in more detail in paragraph 36 above. Therefore there is a public interest in an organisation existing which is capable of providing viewing figure information to the BBC, and it is important that this organisation has the confidence of both the BBC and other parts of the television

industry. BARB is presently the organisation which fulfils this role and therefore it is in the public interest that BARB continues to exist.

60. The Commissioner has formed the view that disclosure in this case would prejudice the commercial interests of BARB to the extent that its existence could be jeopardised, see paragraph 52. Therefore the Commissioner finds this argument persuasive in terms of where the public interest lies in this case.
61. The Commissioner is aware that the requested information is available at a commercial rate from BARB. If the complainant wishes to obtain detailed viewing figure information, so that they can conduct their own analysis of the value for money provided by the BBC, they can do so in the same way as any other subscriber.
62. Finally, the Commissioner acknowledges that some information is already in the public domain either via BARB, the BBC, or other broadcasters. Contrary to the views of the complainant, the Commissioner is of the opinion that this does not weigh heavily in favour of further disclosure. This is because the information already in the public domain provides some transparency but further disclosure would undermine future collection of the information by BARB.
63. Having considered the circumstances of this request, the Commissioner is of the view that the public interest in maintaining the exemption under section 43(2) outweighs the public interest in disclosure.

### **Procedural matters**

64. The complainant requested the information in question on 4 January 2005 and was refused the information on 21 January 2005. In their refusal the BBC relied on the Schedule 1 derogation. They did not therefore specify the exemptions on which they wished to rely, having found that the information in question falls within the scope of the Act the Commissioner must conclude that a breach of section 17 has occurred. Section 17(1) requires that when a public authority refuses access to information it must specify in a notice to the applicant the exemptions on which it is refusing the application and why, if not apparent, that exemption applies.
65. The Commissioner therefore concludes that a breach of section 17 occurred here as the BBC did not specify the exemption under section 43 when refusing the request, however the Commissioner acknowledges that the BBC did not, at this juncture, intend to rely on any exemptions under the Act as they had concluded that the requested information did not fall within the scope of the Act.

### **The Decision**

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66. The Commissioner's decision is that the dominant purpose for which the requested information is held is other than that of journalism, art and literature. However the Commissioner is satisfied that the disclosure of the requested

information would be likely to prejudice the commercial interests of BARB and that the public interest favours maintaining the exemption under section 43. The Commissioner has found the BBC to be in breach of section 17 as the BBC did not specify the exemption under section 43 when refusing the request. As there are no steps that the BBC can now take to remedy this, no further action is required.

## Right of Appeal

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67. Either party has the right to appeal against this Decision Notice to the Information Tribunal. Information about the appeals process may be obtained from:

Information Tribunal  
Arnhem House Support Centre  
PO Box 6987  
Leicester  
LE1 6ZX

Tel: 0845 600 0877  
Fax: 0116 249 4253  
Email: [informationtribunal@dca.gsi.gov.uk](mailto:informationtribunal@dca.gsi.gov.uk)

Any Notice of Appeal should be served on the Tribunal within 28 calendar days of the date on which this Decision Notice is served.

**Dated the 4<sup>th</sup> day of October 2007**

**Signed .....**

**Jane Durkin  
Assistant Commissioner**

**Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF**

## Legal Annexe

### Relevant Statutory Obligations and Provisions under the Act.

**Section 43(2)** provides that –

“Information is exempt information if its disclosure under this Act would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it).”

**Section 2(2)** provides that –

“In respect of any information which is exempt information by virtue of any provision of Part II, section 1(1)(b) does not apply if or to the extent that –

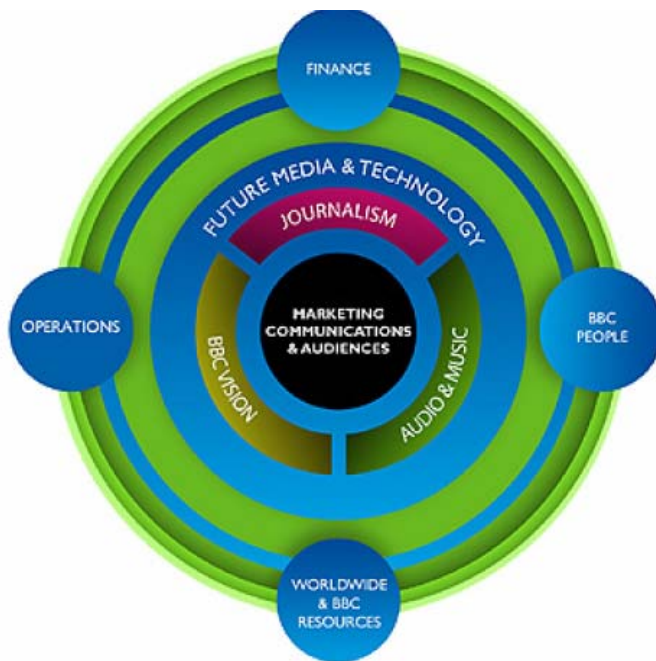
- (a) the information is exempt information by virtue of a provision conferring absolute exemption, or
- (b) in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information”

**Section 17(1)** provides that -

“A public authority which, in relation to any request for information, is to any extent relying on a claim that any provision of Part II relating to the duty to confirm or deny is relevant to the request or on a claim that information is exempt information must, within the time for complying with section 1(1), give the applicant a notice which -

- (a) states that fact,
- (b) specifies the exemption in question, and
- (c) states (if that would not otherwise be apparent) why the exemption applies.”

## BBC structure



## BBC resources

2006 Royal Charter

[http://www.bbc.co.uk/bbctrust/assets/files/pdf/regulatory\\_framework/charter\\_agreement/royalchartersealed\\_sept06.pdf](http://www.bbc.co.uk/bbctrust/assets/files/pdf/regulatory_framework/charter_agreement/royalchartersealed_sept06.pdf)

2006 Agreement with Department for Culture Media and Sport

[http://www.bbc.co.uk/bbctrust/assets/files/pdf/regulatory\\_framework/charter\\_agreement/bbcagreement\\_july06.pdf](http://www.bbc.co.uk/bbctrust/assets/files/pdf/regulatory_framework/charter_agreement/bbcagreement_july06.pdf)

1996 Royal Charter

[http://www.bbc.co.uk/foi/docs/bbc\\_constitution/bbc\\_royal\\_charter\\_and\\_agreement/BBcs\\_royal\\_charter.pdf](http://www.bbc.co.uk/foi/docs/bbc_constitution/bbc_royal_charter_and_agreement/BBcs_royal_charter.pdf)

1996 Agreement with the Department of National Heritage

[http://www.bbc.co.uk/foi/docs/bbc\\_constitution/bbc\\_royal\\_charter\\_and\\_agreement/Agreement.pdf](http://www.bbc.co.uk/foi/docs/bbc_constitution/bbc_royal_charter_and_agreement/Agreement.pdf)

2003 Amended agreement with Department for Media Culture and Sport

[http://www.bbc.co.uk/foi/docs/bbc\\_constitution/bbc\\_royal\\_charter\\_and\\_agreement/Amendment\\_to\\_the\\_Agreement.pdf](http://www.bbc.co.uk/foi/docs/bbc_constitution/bbc_royal_charter_and_agreement/Amendment_to_the_Agreement.pdf)