

# Campaign for Broadcasting Equality CIO Submission to the Puttnam Inquiry into A Future For Public Service Television

## **Diversity and the BBC**

The BBC is the cornerstone of Public Service Broadcasting. The BBC should set the gold standard by which other PSBs and commercial broadcasters are judged. With regard to diversity and BAME employment, the BBC does not set such a standard. This evidence is, therefore, focused on the BBC.

## **Key Recommendations**

In view of the BBC failure, evidenced in this submission, we recommend that:

- 1 BBC Charter and Agreement  
Diversity requirements be stated clearly in the new BBC Charter and Agreement. The current Charter and Agreement include a general requirement for the BBC to promote equal opportunities, but lacks any concrete call to action. As an Appendix, we attach a draft which builds on the provisions in the current BBC Charter and Agreement.
- 2 Protected Funding  
In relation to BAME employment, Protected Funding should be set aside to drive BAME employment in the BBC as a Diversity Fund. The Lenny Henry Plan suggests a useful approach but a more effective model might be developed to which the protected fund could be applied. Protected Funding could also be applied in relation to other under-represented groups and other aspects of the Public Purposes where there is evidence that the BBC has performed poorly.

Additional recommendations are presented at the end of this submission.

## **The Fundamental Principle**

Giving oral evidence to the Lords Communications Committee “BBC Charter Renewal: public purposes and licence fee” inquiry, Sir Peter Bazalgette, Chair of the Arts Council England, stated the principle that should apply to the BBC:

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“The fundamental principle here should be that public money should be spent for the benefit of everybody, and the products of that public money - programming, arts events, whatever they happen to be - should draw on all the talents of the country, not only to reflect the country but to bring forward those people for their personal fulfillment as well.”<sup>1</sup>

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<sup>1</sup> Lords Communication Committee, Evidence Session No. 3 Tuesday 21 July

The DCMS Culture White Paper also makes it clear that “The government expects the cultural sectors to represent our diverse society in their artistic talent, workforce and audiences.”<sup>2</sup> With a £3,726m revenue, the BBC is the most significant publicly funded cultural organisation and should be an exemplar.

## **BBC Failure**

The Lords Communications Committee published extensive evidence from the Campaign for Broadcasting Equality<sup>3</sup> on the BBC failure on BAME employment and representation to which the Puttnam Inquiry is referred.

In its report “BBC Charter Review: Reith not revolution”, the Lords Communications Committee highlighted the following:

“The Campaign for Broadcasting Equality quoted the most recent Purpose Remit Survey which showed that the “vast majority of performance gap measures fell in the range of +3 to -10 but the performance gap for Black participants was -48, worse even than the -42 score for 2013” and that the “proportion agreeing they would miss the BBC dropped from 83 per cent to 59 per cent.” The Survey for 2014 showed that for the first time this remit’s performance gap had overtaken that of distinctiveness, which had previously demonstrated the greatest gap.

The NUJ quoted data from Ofcom which showed that some groups underrepresented in PSB programming. Simon Albury, Campaign for Broadcasting Equality, said that “Improvement in on-screen BAME portrayal is important—but on-screen representation which is not matched by off-screen employment is a hollow, deceptive and superficial gesture. Editorial power and influence lie behind the screen not on it.”<sup>4</sup>

In March 2016, new evidence was published on the BBC and diversity.

Trevor Phillips presented research to the Oxford Media Convention<sup>5</sup> showing that Channel 4 is the only broadcaster managing to appeal to black, Asian and ethnic minority audiences on the same scale as the population as a whole, and that BBC2 takes a 5.7% share of the total audience but just 3.3% of black, Asian and ethnic minority viewers, and, while almost 30% of the UK watches the BBC’s Six O’Clock news bulletin, just 15% of BAME viewers do so. In comparison, Channel 4 attracts 5.6% of all viewers and 4.7% of the BAME audience, while its news

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<sup>2</sup> Page 26 The Culture White Paper, DCMS, March 2016

<sup>3</sup> Campaign for Broadcasting Equality CIO - written evidence 13 November 2015  
<http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/communications-committee/bbc-charter-renewal-public-purposes-and-licence-fee/written/21757.html>

<sup>4</sup> Paragraphs 95- 95, HOUSE OF LORDS Select Committee on Communications, 1st Report of Session 2015–16, BBC Charter Review: Reith not revolution published 24 February 2016

<sup>5</sup> Trevor Phillips speech, IPPR Oxford Media Convention, 2 March 2016

<http://www.ippr.org/files/events/files/events-speech-phillips-160302.pdf?noredirect=1>

bulletin gets a 3.2% share of the news audience as a whole but 5.6% of BAME viewers.

Citing Ofcom figures showing dissatisfaction among BAME people with their representation in public service broadcasting, Phillips said: "People of colour are paying nearly £150 a year for the upkeep of services that actually don't serve them. I would say that whoever regulates the BBC, that is a question that should be near the top of the charter renewal debate. That's the political imperative."

Broadcast magazine published evidence from an FOI request that only 12.2% of the BBC's 19,644 staff were from BAME backgrounds last year, compared with 11.9% in 2014 – a 0.3% increase. As Broadcast reported, "This means the corporation has taken only a small step towards meeting its target of 14.2% of its workforce being from diverse backgrounds by next year. The BBC also remains behind the wider country in terms of representation, with 12.9% of UK residents identifying themselves as non-white in the 2011 census."<sup>6</sup>

### **Flash-In-The-Pan Initiatives**

Broadcast's evidence that only 12.2% of staff were from BAME backgrounds in 2015 casts a revealing light on the effectiveness of the BBC Diversity initiatives.<sup>7</sup>

12.2% in 2015 is still 0.2% *below* the target of 12.5% which the BBC set for 2007, eight years ago.<sup>8</sup> There is only a 2.2% advance on the 10% the BBC achieved in 2003.<sup>9</sup> Despite all its diversity initiatives, the BBC has only managed a 2.2% net increase in BAME employment over 12 years.

It is now more than 15 years since the Corporation published the BBC Cultural Diversity Network Action Plan in September 2000. In it the BBC pledged to reflect "the UK's diversity in our programmes, our services and our workforce."

The plan included:

- Incorporating diversity as part of the programme planning process – attention to be focused on the top ten programmes in each department

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<sup>6</sup> "BBC fails to make strides in boosting staff diversity" [Jake Kanter](http://www.broadcastnow.co.uk/news/bbc-fails-to-make-strides-in-boosting-staff-diversity/5100975.article) 3 March 2016 Broadcast <http://www.broadcastnow.co.uk/news/bbc-fails-to-make-strides-in-boosting-staff-diversity/5100975.article>

<sup>7</sup> The BBC has claimed "The last 12 months have seen the biggest increase during the lifetime of the strategy document to a current figure of 13.1%: this is an all-time best figure for BAME representation in the BBC workforce." The BBC figure is enhanced by the inclusion of BBC Worldwide with 21.3% BAME and other subsidiaries exempt under the FOI. It is interesting that commercial entities like Sky and BBC Worldwide perform so much better than the public service broadcaster.

<sup>8</sup> BBC Annual Report and Accounts 2003/2004 Page 18

<sup>9</sup> *ibid*

- Developing experienced minority ethnic staff to enable them to compete for senior positions in the BBC
- Targeting black undergraduates for work placements and vocational training
- Reorganising recruitment with a new Recruitment Agency to reach out to different communities
- A BBC Mentor Project
- Targeting talented staff and integrate diversity into management development
- Renewing the New Writing Initiative to find new minority talent

The plan said the BBC had a “Diversity Centre” with a team of 12. It listed 12 programmes to demonstrate that the BBC was “making greater progress in reflecting multi-racial Britain” and 13 awards it had won.

Diversity in media has a history of Flash-In-The-Pan initiatives which are announced with a great flourish but which fail to deliver structural change. The BBC Cultural Diversity Network Action Plan (2002) is an impressive example. The plan’s catalogue of positive initiatives has now been tested over 15 years and it is clear that individually and taken together they have failed to drive the required change. Lenny Henry told the Commons Culture, Media and Sport Committee that there have been 29 BBC diversity initiatives over the past 15 years.<sup>10</sup>

The BBC report “Equality And Diversity at the BBC – 2014/15”<sup>11</sup> excludes negative data. It highlights “good news,” positive case histories and the achievements of the Diversity Creative Talent Fund, the one new BBC initiative that does not mirror an element in the Action Plan of 2000.

The Diversity Creative Talent Fund amounted to no more than 0.12% of the BBC’s 2012 content budget (of £1,789.1m) and was explicitly dedicated to projects which can demonstrate improved on-screen portrayal. The report said the funds achievements were:

- On-screen - 17 new presenters and 8 new factual experts

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<sup>10</sup> Written evidence submitted by Lenny Henry, Marcus Ryder and Patrick Younge (FBB0129), June 2014

<http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/culture-media-and-sport-committee/future-of-the-bbc/written/10950.pdf>

<sup>11</sup> “Equality And Diversity at the BBC – 2014/15”

<http://www.bbc.co.uk/diversity/strategy/equalityreport2015>

- Off-screen – 3 new BAME writers, 5 iPlayer shorts scripts, and a new comedy series “whose story hinges on BAME casting and director”

This is all good but it represents infinitesimal progress towards addressing the scale of the urgent structural change in BAME employment that is required.

The BBC does appear to be greatly increasing the use of BAME people on-screen but on-screen representation which is not matched by off-screen employment is a hollow, deceptive and superficial gesture. Editorial power and influence lie behind the screen not on it.

As indicated, today the BBC is still short of the target it set for 2007 and has only managed a 2.2% increase in BAME staff over 12 years. It is clear that additional and more effective measures are now needed to drive BAME employment at the BBC. The Lenny Henry Plan is the most effective proposal for driving BAME employment.

### **The Lenny Henry Plan**

In March 2014, in a BAFTA lecture,<sup>12</sup> Lenny Henry proposed “ring-fenced funding’ to drive BAME employment. He argued that to address under-representation of the Nations and Regions, the BBC said “they would spend 50% of their money outside of the M25; and for Scotland, Wales and Northern Ireland they went further, promising them that the proportion of programme spend in each nation, would at least match that nation’s percentage of the UK population. They set firm targets and even set quotas of a minimum amount of programmes they were going to commission from each nation and region.”

This led to “ a 400% increase in the number of network programmes produced in the English regions. By 2016 over half of network spend will be made out of London. In just two years’ time (2016) the amount of network spend in Scotland, Wales and Northern Ireland should accurately reflect the size of the population there.”

Henry proposed a similar approach to address the under representation of BAME people with a “ring-fenced budget” for BAME productions. A BAME production would have to meet two of the following criteria:

“A) At least 50% of the production talent (i.e. not on-screen talent) by cost must be Black, Asian or Minority Ethnic. The production staff will be self-declaring about their ethnicity - self-declaration is a common principle in both police, health and other government monitoring of BAME statistics.

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<sup>12</sup> “Lenny Henry: his BAFTA Lecture in full”, Televisual, 18 March 2014  
[http://www.televisual.com/blog-detail/Lenny-Henry-his-Bafta-Television-Lecture-in-full\\_bid-597.html](http://www.televisual.com/blog-detail/Lenny-Henry-his-Bafta-Television-Lecture-in-full_bid-597.html)

B) The production company must be 30% BAME controlled, and/or 30% of senior personnel involved in the production in question must be BAME.

C) At least 50% of on-screen talent by cost must be Black, Asian or Minority Ethnic.”

In June 2014, the author wrote “The general population is more than 12% BAME and set to double by 2045. If the BBC ring-fenced 12% of production budgets across all genres for productions that matched the Henry Plan, it would create a clear demand. By the Henry criteria of 50% maximum, it would only lead, at best, to a modest 6% BAME employment in production.”<sup>13</sup>

He argued, “There may already be a sufficient population to satisfy the demands of the Henry Plan with a 12% ring-fenced budget. If not, BAME employees would be employed at a premium rather than at a discount.”<sup>14</sup> It may be that there is currently an insufficient supply of appropriately skilled people to match the Henry Plan and that the ring-fenced budget would not be spent in its entirety. If the ring-fenced fund were rolled over annually like a lottery jackpot, the demand for BAME production staff would increase. In the longer term, the market would drive recruitment, training and development of new and existing BAME talent.”<sup>15</sup>

If the amount of network spend in Scotland, Wales and Northern Ireland is intended to accurately reflect the size of the population there, it is appropriate that BBC network spend should reflect proportionately the size of the BAME population. There is provision for ring fenced funding in the form of a Diversity Fund and how it might be applied in the draft Charter and Agreement Appendix.

### **BBC Arguments Against The Lenny Henry Plan**

The BBC objections to the Lenny Henry Plan were presented for the first time by Charlotte Moore, then Controller BBC One, at a BAFTA event “Diversity in Television: Lenny Henry 18 months on” on 17, November 2015.

In response to questions on ring fenced funds, Charlotte Moore said<sup>16</sup> that the BBC had thought long and hard about ring fenced funding. Quotas were very difficult and complex to put in place and she worried that ring fencing might have some of the same issues as quotas — that you might just go “that’s the issue over there —

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<sup>13</sup> Simon Albury, “Corruption, Economics and the Henry Plan”, Broadcast, 19 June 2014

<sup>14</sup> In Broadcast, January 2014, Jane Mote wrote: “I was shocked when recruiting for our new television station London Live that the BAME applicants consistently appeared to be on worse contracts and had lower wages than their white counterparts, even though they often had better skills.”

<sup>15</sup> *ibid*

<sup>16</sup> This summary is based on the Soundcloud recording of the event attached to “Lenny Henry reiterates his call for a ‘sea change’ on diversity” Richard Vine, Guardian, 18, November 2015 [http://www.theguardian.com/tv-and-radio/tvandradioblog/2015/nov/18/lenny-henry-reiterates-his-call-for-a-sea-change-on-diversity?CMP=share\\_btn\\_tw](http://www.theguardian.com/tv-and-radio/tvandradioblog/2015/nov/18/lenny-henry-reiterates-his-call-for-a-sea-change-on-diversity?CMP=share_btn_tw)

dealt with!” What the BBC really wanted to do was to make sure that diversity was in the mainstream and that diversity was actually holistic, “that it should be throughout all of our productions — that is both in front of the cameras as well as behind the camera.” She said she didn’t believe ring fenced funding would bring the change across all BBC productions that she believed the BBC needed. In relation to the comparison with ring fenced funds for Nations and Regions, she said that with Nations and Regions it was a very complex picture. One of the real issues with some of the quotas for Nations and Regions that the BBC had was about sustainability. What was needed was sustainable change across the industry and across the whole of the BBC. She said, “I don’t want to see it as another tick boxing exercise that can happen with quotas, that can happen with ring fenced money, that then disappears.” She said that the solutions that the BBC was offering up, had been thought about long and hard and she really felt that that these are the solutions that would bring about real change.

The BBC argument raises a range of issues which deserve comment. Charlotte Moore suggests that quotas and ring fenced funds would be difficult to put in place. They are only difficult to put in place where they relate to under-represented groups. Implementing quotas and ring fenced funds may have been difficult and complex in relation to Nations and Regions, as has been suggested, but this approach has been effective and the effort that was expended to addressing the complexities for Nations and Regions should now be applied to rectify the chronic under-representation of BAME people in BBC employment. Addressing the under-representation of Nations and Regions has given the BBC a wealth of experience which it could now apply to quotas and ring fenced funds for under-represented groups. In relation to Nations and Regions, the BBC is not claiming that “the issue is over — dealt with!” but it can claim justifiably that with the 400% increase in Network programmes produced in the English Regions, significant progress has been made.

Furthermore, there need be no conflict between ring fenced funds, quotas, targets and other measures to promote diversity. They are complementary. Ring fenced funds would certainly drive change and if the same percentage of ring fenced funding were applied across each BBC department, in line with the Lenny Henry Plan, it would drive change across the whole of the BBC and ensure that diversity was placed in the mainstream. Given that the BBC is the sum of its sometimes interdependent parts it is difficult to understand how such an approach might not be considered an essential element in a holistic approach. It is also hard to understand how the change to fairer representation across the BBC might not be sustainable if ring fenced funding and quotas were to be sustained.

Ms Moore suggested that the solutions that the BBC was offering up would bring real change. The evidence presented above in BBC Failure and Flash-In-The-Pan Initiatives demonstrates why Ms Moore’s optimism is not grounded in reality.

### **Tick Boxing and Tokenism**

It is important to understand tick boxing and tokenism. Charlotte Moore said she

did not want to see diversity as another tick boxing exercise. The terms “tick boxing” and “box ticking” are always applied as derogatory terms yet they mean nothing more than meeting criteria. Management of organisations both large and small requires that decisions are measured against criteria which may be explicit or implicit.

For example, the appointment of the BBC Director General involved considerable box ticking.<sup>17</sup> There were twelve “Must Have” boxes to be ticked. It was also suggested that it would also be nice if the Director General had Commercial acumen, Editorial background, Cross-platform experience, and International experience. The appointment process led to a successful outcome because there were criteria to be met by which potential candidates could be identified and from which the best candidate could be selected.

The assumption that in considering box ticking, targets and tokens that consideration of merit must be excluded is mistaken and the role of tokens is misunderstood.

A token appointment may serve to indicate that a particular group or perspective is being taken into account. In seeking a token, the best person should also be sought.

The author was a founder director of Meridian Broadcasting and had responsibility for ticking boxes and finding tokens for some Non Executive board roles for the ITV franchise application process. The outcome provides an example of how such considerations can enhance an organization.

Following the Broadcasting Act 1990, the Independent Television Commission issued Invitations to Apply for Channel 3 Licences. The document provided all relevant information for prospective applicants. From that information applicants could infer a number of boxes that needed to be ticked. As the Meridian bid was headed by a Labour Peer, Lord Hollick, in addition to other boxes, it was also important that a Tory be found as a meaningful token of balance on the board.

The Meridian application for the South and South East ITV franchise had the following implicit boxes to tick in appointing Non Executive Directors:

1. Someone from Essex or Kent,
2. Someone from Sussex, Hampshire or Dorset,
3. Someone from Essex, Berkshire or Wiltshire,
4. A token Minority Ethnic,

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<sup>17</sup> [http://downloads.bbc.co.uk/bbctrust/assets/files/pdf/news/DG\\_jobspec.pdf](http://downloads.bbc.co.uk/bbctrust/assets/files/pdf/news/DG_jobspec.pdf)



## 5. A token Tory.

These 5 boxes were ticked with:

Baroness Flather of Windsor and Maidenhead (3, 4, 5),

Sir Richard Luce, now Lord Luce (2, 5),

Roger De Haan, now Sir Roger de Haan (1).

The outcome makes it self-evident that there need be no conflict between tick boxing, tokens and merit. As Lady Flather has often observed “When you appoint tokens they don’t act like tokens.”<sup>18</sup>

It is clear that the BBC’s objections to the Lenny Henry Plan do not stand up.

### **Other Recommendations**

The Lenny Henry Plan would provide the most effective means of driving BAME employment. In addition, the following proposals would assist in parallel:

#### **Top Ten Programmes Quota**

The BBC Cultural Diversity Network Action Plan 2000 said, “attention will be focused on the top ten programmes in each department.” In 2014, Alex Mahon, then CEO of the Shine Group, proposed that the top ten programmes by ratings/year should be representative of the UK and suggested that this would be widespread enough to make a substantive difference and simple enough to measure.<sup>19</sup> As a first step, as well as more ambitious targets, the BBC should set a quota of 12% BAME employment as a floor on its top ten radio and television programmes in each department based London by 2017. Given that London is 41.5% BAME this is a modest quota after 15 years of inadequate action.

#### **Transparency and FOI**

The DCMS Green Paper says that “The BBC is also subject to the Freedom of Information (FOI) Act (except for information held for the purposes of journalism, art or literature). These sources of information help civil society and the wider media hold the BBC to account.”<sup>20</sup>

In relation to an FOI request asking the actual jobs included in the statement that “the editorial department of Holby City included 40% BAME employees”, the BBC responded that “We have withheld information relating to specific job roles under section 40(2) of the Act as this could lead to individuals being identified. Personal information about living individuals is exempt if disclosure to a third party would

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<sup>18</sup> Lady Flather and Lord Luce have been consulted about this section of the evidence. They now sit as Cross Benchers but they were Conservatives during the relevant period.

<sup>19</sup> Enders Analysis Creative UK Conference, 18 March 2014

<sup>20</sup> BBC Charter Review: public consultation, Department for Culture, Media and Sport, page 71, July 2015

breach one or more principles of the Data Protection Act 1998. The individuals concerned would not expect their personal data to be disclosed to a third party. To do so would be unfair; therefore, disclosure would breach the First Data Protection Principle (fair and lawful processing).”

This response does appear to stretch the concept of “identification” beyond breaking point. It would be helpful if the BBC were required to respond with more detailed information to enquiries of this kind on BAME employment.

### **Public Sector Equality Duty**

The public sector equality duty under the Equality Act 2010 requires the BBC to have due regard to:

- Eliminate discrimination, harassment and victimisation
- Advance equality of opportunity between people who share a protected characteristic and those who do not
- Foster good relations between people who share a protected characteristic and those who do not<sup>21</sup>
- The duty applies to the BBC “except in respect of functions relating to the provision of a content service (within the meaning given by section 32(7) of the Communications Act 2003(a))”.<sup>22</sup>

The latter qualification means that the duty does not apply to activities such as:

- Commissioning
- Production
- Casting
- Editorial policy
- Scheduling<sup>23</sup>

The nature of this sweeping exemption should be amended by Order so that the Public Sector Equality Duty can apply to a wider range of BBC activities.

### **Conclusion**

It is now more than 15 years since the BBC pledged to reflect “the UK’s diversity in our programmes, our services and our workforce.” The measures it has taken to advance BAME employment have failed to drive the necessary structural

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<sup>21</sup> BBC, Developing Our Story, Equality Information Report 2012  
<http://www.bbc.co.uk/diversity/strategy/equalityreport2012/diversity>

<sup>22</sup> House of Commons Library, Briefing Paper Number 06591, 22 January 2015 The Public Sector Equality Duty and Equality Impact Assessments

<sup>23</sup> BBC, Developing Our Story, Equality Information Report 2012  
<http://www.bbc.co.uk/diversity/strategy/equalityreport2012/diversity>

change. Diversity obligations should now be placed unambiguously in the Charter, Agreement and Public Purposes. (See Appendix)

The Lenny Henry Plan for ring fences funding would provide an effective driver of BAME employment. The Government should provide for the ring fenced funding via Protected Funding. If the amount of network spend in Scotland, Wales and Northern Ireland is intended to accurately reflect the size of the population there, it is appropriate that BBC network spend on the plan should reflect proportionately the size of the BAME population.

The other recommendations would enhance the implementation of the Lenny Henry Plan.

## Appendix

### **BBC Charter and Agreement – diversity proposal**

#### **Public Purpose enhancement**

To represent the UK, its nations, regions and the communities within them, both in content and in the diversity of the workforce

In fulfilling this purpose, the BBC should seek to ensure that:

- its content reflects the full diversity of the UK and draws on the talents of every part of the population.
- its workforce within Scotland, Wales, Northern Ireland and each region of England reflects the diversity of the population within that nation or region.

#### **Diversity – new requirement**

1. The BBC should aim to ensure that the workforce employed, in:
  - providing the BBC's public services
  - commissioning and making content for those services
  - appearing in programmes on those services,

including in leadership roles across these areas, fully reflects the diversity of the UK population. The diversity of the workforce within each English region, and within each of the other nations of the UK, should reflect the population within that nation or region.

2. In pursuing this aim, the BBC must in particular make arrangements for promoting equal opportunities between:

- men and women
- people of different racial groups

and for equalization of opportunities on the ground of disability, sexual orientation and transgender status.

[The Secretary of State may, by direction to the BBC, add any other form of equality of opportunity that s/he considers appropriate.]

3. The BBC Board must publish a strategy describing the actions it proposes to take to secure substantial progress each year in relation to the above aim. The strategy should set out how progress will be measured, including appropriate targets and metrics.

4. The actions set out in the strategy must include a specified annual budget, the Diversity Fund, set for three years on a rolling basis, allocated to the funding of programmes which meet specified Diversity Criteria. The size of the Diversity Fund should be sufficient to make a substantial contribution to the aim in

paragraph 1. Any part of the specified budget which is unused in one year shall be added to the budget for the following year

5. The Diversity Criteria shall be set by [the regulatory body] so as to ensure that productions supported by the Diversity Fund make a significant contribution to improving the representation of underrepresented groups within the workforce. [The regulatory body] must consult interested parties before setting the criteria.

6. The BBC Board must report annually to [the regulatory body] on progress made towards the aim, including performance against the identified targets. If the regulatory body considers that progress is inadequate, it may require further action, including changes to targets.

7. The BBC Board's report and the conclusions of [the regulatory body] must be published.