



Information Rights

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Roger Hyam

Via email: [rogerhyam@gmail.com](mailto:rogerhyam@gmail.com)

8 March 2019

Dear Mr Hyam

### **Request for Information – RFI20190261**

Thank you for your request to the BBC of 11<sup>th</sup> February 2019 under the Freedom of Information Act 2000 ('the Act') seeking the following information:

*"My address is registered as "No Licence Needed" (NLN) as I don't watch TV. I meet quite a few people in a similar situation but I can find no break down of the number of addresses in this category even in the 2017 NAO report.*

<https://www.nao.org.uk/wp-content/uploads/2017/02/BBC-TV-licence-fee-collection.pdf>

*The only numbers I can find are on Wikipedia for 2013 at 1,879,877.*

[https://en.wikipedia.org/wiki/Television\\_licensing\\_in\\_the\\_United\\_Kingdom](https://en.wikipedia.org/wiki/Television_licensing_in_the_United_Kingdom)

*The recent parliamentary research briefing mentions 27m households in the UK owning a TV with an evasion rate of 7% which would be close to 1.8m mentioned as the NLN household count in wikipedia.*

<https://researchbriefings.parliament.uk/ResearchBriefing/Summary/CBP-8101#fullreport>

*The NAO gives a break down of evasion by nation. This is clearly an estimate as consisting of addresses that neither have a licence nor NLN but MAY use a TV.*

*This is all very confusing and makes it seem like something is being hidden. Why report estimated evasion rate but not known NLN rates? There appear to be as many NLN addresses as estimated evading address.*

*Please would you provide under FOI the basic numbers for:*

- 1. Number of addresses in the TV Licence database.*
- 2. Number of addresses with a current TV licence.*
- 3. Number of addresses with a current NLN.*

4. *Break these down geographically to as smaller units as convenient but at least to nation level. First part of postcode would be brilliant.*
5. *Provide them for most recent years ideally 10. Picking a single sample point each year would be fine, say 6th April.*  
*These should be relatively straightforward database queries or available from internal reports. It would be good if they were made routinely available.”*

Please note that “TV Licensing” is a trade mark used by companies contracted by the BBC to administer the collection of television licence fees and enforcement of the television licensing system. The majority of the administration of TV Licensing is contracted to Capita Business Services Ltd (‘Capita’). Over-the-counter services are provided by PayPoint plc (‘PayPoint’) in the UK, and by the Post Office in the Isle of Man and Channel Islands. Target Group (‘Target’) is the supplier for the Simple Payment Plan trial. Marketing and printing services are contracted to Proximity London Ltd. Media services are contracted to Media Planning Limited trading as Havas Media UK. The BBC is a public authority in respect of its television licensing functions and retains overall responsibility.

Firstly, I would like to respond to your comments about the evasion information published by the NAO, outside the scope of the Act. The breakdown of TV Licence evasion by nation is estimated because evasion is calculated using multiple sources of information which are only aggregated at UK level. For the purposes of administering the TV Licence system, there is no reason for evasion to be recorded by nation.

Further information about the calculation of Licence fee evasion can be found in the BBC Trust statement on the Television Licence Fee 2017/18. This is available on the TV Licensing website at <https://www.tvlicensing.co.uk/about/bbc-trust-statement-AB21>.

### **Your request**

I should explain that the Act gives a general right of access to all types of recorded information held by public authorities. We are not required to create new information to respond to a request, or give a judgement or opinion that is not already recorded.

We have interpreted each part of your request as seeking information for the UK together with a breakdown by nation. Since TV Licensing reports information on a financial year basis, the figures we are providing are as at the end of each financial year for the period 2007/08 to 2017/18 (the last ten full financial years).

I shall address these in turn below.

### **Part 1**

Please see overleaf the total number of addresses (domestic and non-domestic) on the TV Licensing database as at the end of each financial year over the last 10 years. Please be advised that the report that is used to extract the information from the TV Licensing database does not provide a geographical breakdown and therefore we are unable to disaggregate these figures by nation.

	<b>Total number of addresses on the TV Licensing database</b>
2008/09	30,174,267
2009/10	30,440,595
2010/11	30,642,220
2011/12	30,829,398
2012/13	30,959,792
2013/14	31,121,185
2014/15	31,331,676
2015/16	31,533,210
2016/17	31,797,372
2017/18	32,065,891

## **Part 2**

TV Licensing reports on the number of TV licences 'in force' (LIF) and the exact number of licences in force varies on a daily basis as people will be buying new licences and some will terminate payment schemes before full payment has been made. We publish information on the approximate LIF in the UK, as at the end of each financial year, on the TV Licensing website and therefore the information requested for the relevant time period is already in the public domain at <https://www.tvlicensing.co.uk/about/foi-licences-facts-and-figures-ABI8>.

As per my response to part 1 of your request above, the report used to extract the information from the TV Licensing database does not provide a geographical breakdown and therefore we are unable to disaggregate these UK figures by nation.

## **Part 3**

By way of background, in accordance with the BBC TV Licensing No Licence Needed ('NLN') Policy, if people do not use any device to watch or record television programmes as they are being shown on TV or live on an online TV service, and to download or watch BBC programmes on demand, including catch up TV, on BBC iPlayer; they can contact TV Licensing to make an No Licence Needed (NLN) declaration. The policy is available on the TV Licensing website at <http://www.tvlicensing.co.uk/about/foi-policies-ABI7/>. Households declaring NLN are guarded on our database so no mailings will be sent for approximately two years.

We rely on the public to notify us if they do not require a licence. All our letters to unlicensed addresses let people know how easy it is to inform TV Licensing via our website form or by calling or writing to us. As explained above, NLN guards last for approximately two years and after this period we write to confirm whether circumstances remain the same, as the occupants may now require a licence or may have moved house. If we receive information suggesting occupants have moved house during this period, we will send a confirmatory letter before the end of the two year period: this enables us to minimise communications to those who do not require a licence.

Please also be advised that TV Licensing reserves the right to visit addresses that have made an NLN declaration to confirm that there are no devices in use at that address to watch or record receive television programmes because people do sometimes inform us they don't need a licence

when they do. These routine visits are necessary because, when we make contact, we find almost one in six people who've told us they don't need a licence actually do need one.

As you have referred to NLN households in your request, please see below information on the number of domestic addresses with an NLN status in the UK, broken down by nation. These figures include NLN statuses that have been renewed and new NLN statuses. It's important to note that there is churn within these numbers as over the course of the years, NLNs will be cancelled and new NLNs declared.

The information provided is accurate as at the end of each financial year for the period 2013/14 to 2017/18. Due to a change of responsibility and methodology for reporting NLN in March 2014, comparable NLN data for previous financial years is not available<sup>1</sup>.

For context, there are more licences in force than ever before – 25.8 million.

<b>Domestic addresses with NLN status , as at the end of each financial year</b>						
	<b>England</b>	<b>Wales</b>	<b>Scotland</b>	<b>N.Ireland</b>	<b>Islands*</b>	<b>Total</b>
<b>2013/14</b>	791,257	37,665	82,259	19,635	2,285	933,101
<b>2014/15</b>	853,716	41,984	97,436	21,755	2,634	1,017,525
<b>2015/16</b>	957,854	48,299	118,237	25,444	2,680	1,152,514
<b>2016/17</b>	948,059	48,154	118,611	26,307	2,864	1,143,995
<b>2017/18</b>	997,372	50,675	126,275	28,259	3,033	1,205,614

\* Jersey, Guernsey and Isle of Man

Please also note that we cannot guarantee that there are no businesses addresses included in these numbers as customers do not always declare the status of the address when making a no licence needed declaration. In addition, it should be noted that when people who have declared they do not need a licence then move house, they often do not notify TV Licensing. Finally, there may also be people within these numbers who have claimed NLN twice over that period (for example someone who has moved to a new address and declared NLN without cancelling the NLN at their previous address). For those reasons therefore, these figures may be overstated.

## **Appeal Rights**

If you are not satisfied that we have complied with the Act in responding to your request, you have the right to an internal review by a BBC senior manager or legal adviser. Please contact us at the address above, explaining what you would like us to review and including your reference

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<sup>1</sup> Whilst it is theoretically possible to derive this information using current methodology, we estimate that to extract, analyse and reconcile this data would take more than two and a half days. Under section 12 of the Act, we are allowed to refuse to handle the request if it would exceed what is referred to as the 'appropriate limit'. The appropriate limit has been set by the Regulations (SI 2004/3244) as being £450 (equivalent to two and a half days work, at an hourly rate of £25).

number. If you are not satisfied with the internal review, you can appeal to the Information Commissioner. The contact details are: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, Tel: 0303 123 1113 or see <https://ico.org.uk/>.

Yours sincerely

Rupinder Panesar

**Freedom of Information Advisor, TV Licensing Management Team**

