



Satellite & Cable  
Broadcasters' Group

## **Response from the Satellite and Cable Broadcasters Group (SCBG) to the DCMS Green Paper: “*Review of the BBC’s Royal Charter, a strong BBC, independent of government*”**

The Satellite and Cable Broadcasters’ Group (SCBG) is the trade association for satellite and cable programme providers. Its members are responsible for over 100 channels in the UK and in addition broadcast many more services from the UK to continental Europe and beyond. SCBG channels remain highly targeted, with audience shares ranging from less than 0.01% to 2% of digital viewers, but with a combined share of 17% of multi-channel viewing and over 10% of total television viewing. They are chosen increasingly by audiences migrating away from traditional channels. They provide specialist factual and educational services to viewers interested in history, music, nature, art or science, as well as broadcasting to cultural and ethnic minorities in their own languages. They are also providing and developing innovative enhanced and interactive services.

Satellite and cable broadcasters operate in an extremely competitive and volatile environment, without privileged access to scarce Government-controlled spectrum or to the must-carry status afforded to terrestrial networks. They are therefore unable to attract mass advertising revenues, and do not benefit from public funding. Instead, satellite and cable broadcasters depend entirely on their own programming investments and marketing initiatives to attract and keep audiences across a range of different broadcasting platforms. Their viability depends on an ability to adapt to technological developments, respond directly to audience preferences and quickly absorb commercial pressures.

Satellite and cable broadcasting is the fastest growing sector in the UK television industry, employing over 6,000 people in the UK with revenues of nearly £5 billion. This sector produces more originated programming than the terrestrial channels combined, accounting for more than half the UK’s total spend. Satellite and cable channels are also providing a huge boost to public service output, broadcasting 14,000 hours of public service programmes in a typical month.

## **Introduction**

The Government made clear in the 2003 Communications Act its policy of promoting plurality and consumer choice, and encouraging new private investment while maintaining and strengthening public service broadcasting, in the fully digital future. As we demonstrated in our recent paper *Public-Private Partnership for the Digital Age*, if this vision is to be delivered the multi-channel sector must be included alongside the BBC and other existing public service broadcasters.

Although it is a relatively new and developing arm of UK broadcasting, the private multi-channel sector has established a central and innovative role in the UK broadcasting ecology. Its channels and services already reach 60% of UK homes, providing over 300 different consumer choices. More importantly, in the categories of “public service” programming defined by Ofcom in its Public Service Broadcasting Review, these channels already deliver more hours of public service television than all the terrestrial channels combined.

We do not question that the BBC is and should remain the cornerstone of public service broadcasting. But we are concerned that the imprecise nature and scope of regulation proposed for the BBC in the Green Paper risks excluding a growing private sector from helping to achieve the Government’s aims. In particular, we would draw your attention to Ofcom’s explicit recognition of the risk of crowding out in the final report of its Public Service Broadcasting Review, where it warned of a “chilling effect” on the market, and the need therefore to tighten remits and regulation in areas that impact commercial innovation.

The activities and economies of the private sector are affected more by publicly funded competition than by any other factor. In particular, a lack of clarity about the scope and regulation of the BBC has led to uncertainty for commercial channels. This hampers investment and growth opportunities that would benefit viewers – viewers who increasingly choose to watch specialist commercial channels rather than the traditional networks. Unless the future role, scale and regulation of the BBC are more precisely defined in relation to the remainder of UK broadcasting, the expansion of the multi-channel sector – and its increasing contribution to origination and public service – will be stopped in its tracks. Maintaining the BBC’s strength and independence must not mean compromising the ambition of private sector alternatives.

## **Questions 1-3: the role of the BBC**

We agree with two fundamental statements in the Green Paper: first, that the BBC should remain strong, independent and the cornerstone of public service broadcasting in the UK; secondly, that it should be distinctive from commercially funded services. For the benefit of consumers, taxpayers and the UK economy, the second criterion needs to be applied with much more rigour than is presently envisaged.

Since the last Charter was granted we have entered a new age of publishing via digital television and the internet, making hundreds of channels and websites available to citizens who can choose whether or not to pay for them - just as they do for commercially published books and CDs, newspapers and magazines. 60% of households now have multi-channel television, with a choice of over 300 channels serving a multitude of different tastes, interests, demographics and cultural groups. The role of public service broadcasters, and in particular the BBC, needs greater re-evaluation within this new context than the Green Paper allows.

In today's era of choice, the only justification for a compulsory communication tax in the form of the Licence Fee is that it will provide desirable public services not otherwise available, thereby providing a publicly funded remedy to a classic market failure. Undoubtedly there are services that a civilised society should demand. They include impartial, properly funded news independent of political control, and a range of formal and informal education for citizens of all ages. Arguably they include certain kinds of drama and serious documentary, and programmes of arts and music. But other broadcasters, including independent commercial digital channels, now provide all of these. In fact in the majority of programme genres that Ofcom defines as "public service broadcasting", channels other than the BBC's now provide most of the UK output: more than 60% of news and current affairs, more than 90% of documentaries, more than 80% of arts and music programmes. It follows that publicly funded broadcasting should now be limited to services, or to a quality of service, that the private economy cannot provide or *would not provide* in the absence of competing public subsidy.

This reflects the EU rules governing the use of State Aid, which require that publicly funded services such as the BBC's must complement rather than substitute or duplicate provision by the market. Furthermore, where market developments supersede publicly funded provision, the BBC should withdraw from those services or activities and re-direct its valuable public resources to areas of activity where there is a proven market failure. While market failure should not be the only test applied to BBC services, it should provide the underpinning for all publicly funded BBC services. The absence of a market failure analysis raises significant questions as to the compatibility of the BBC's publicly funded status with European State Aid rules.

#### **Private v. public finance**

Unlimited provision of public money is wasteful for the taxpayer and tends to crowd out the supply of private equivalents. This is evidenced emphatically in SCBG'S recent report *Public-Private Partnership for the Digital Age*, whose factual data confirms Ofcom's statement that "in the absence of licence-fee-funded BBC content, there would be better funded and potentially more niche channels than exist in today's market". In other words there is growing evidence that the BBC may be the source of market failure rather than the remedy.

So it is important that the BBC's duties and responsibilities are confined to meeting needs unmet either by other public service broadcasters, or by

present or potential commercial services. Without this limitation we will be faced with the paradox of a BBC that expands constantly to mirror private-sector initiatives, rather than complementing them, and a licence fee that rises above inflation every year in spite of increasing corporate and personal investment in alternatives.

#### **Inadequate restrictions**

However, the Green Paper's definitions of the role and purposes of the BBC are too vague to ensure that the BBC's financing and functions stay within these necessary limits. They are locks that any key will fit. Most significantly, there is no criterion of "distinctiveness" included in either the proposed purposes or characteristics. Had the proposed definitions and purposes been enshrined in the last Charter, they would not have prevented the BBC from making any of the programmes nor embarking on any of the enterprises that now come under strong criticism from many quarters including the BBC's supporters. They will not prevent similar misjudgements and excesses in the future.

#### **Laissez-faire v. regulation**

This is in part because the Green Paper confuses the characteristics of high-quality broadcasting with the purposes of the BBC. Of course it is possible for a publicly financed BBC to go on producing high-quality programmes on any subject, for example house-hunting in Spain, and spending large amounts of public money on rights or acquisitions such as UK National Lottery draws. Under the Green Paper's purposes and characteristics, such programmes would fall firmly within the BBC's remit. But they no longer have a place in broadcasting funded by compulsory taxation, since other broadcasters can readily provide them at levels of equal or greater quality without recourse to public funds. There is some provision in the Green Paper to stop the BBC bidding against other *terrestrial* broadcasters for the same content, but no such protection for the non-terrestrial sector. This lack of platform neutrality is at odds with the reality of a multi-platform digital television environment. While we do not argue that satellite or cable services will attain universal penetration in the UK, it is important to recognise that terrestrial is only one platform in an increasingly complex ecology – one in which traditionally terrestrial broadcasters compete by offering their services via cable and satellite, and traditionally cable and satellite broadcasters compete for channel licences on DTT. The remit and regulation of the BBC should reflect this. Without proper definition, according to the new digital reality, the proposed regulations are a licence for the BBC to compete against the private cable and satellite sector for any type of content, at any scale of expenditure.

#### **No commitment to distinctiveness**

The Green Paper is of course right to argue that the BBC "should not be a broadcaster that shows only minority-interest programming". But it fails to make the case for a BBC that is distinct from and complementary to all other services. Every restrictive rubric in the Green Paper, such as paragraph 1.23, which states that the BBC "should aim to complement what is available on commercial channels", is matched elsewhere by a comforting escape clause. For example, the BBC is mandated to "provide a wide range of programmes across *every genre* [our italics], and try to reach the widest possible range of

audiences". Its programmes must be "entertaining" (1.19) but need be neither of high quality nor original, provided they are "engaging"(*ibid*). None of this represents the "objective system for making judgments about performance" that was called for by Lord Burns' Independent Advisory Panel.

- *In our view the BBC must be subject to an over-riding and rigorous requirement that all its services and programmes are distinct from, and complementary to, what is available on other services. This requirement should be monitored independently, and sanctions should be immediate if it is breached.*
- *While we support the principle of a market value test, market failure must be at the heart of that test. Otherwise there is a significant risk that the public funding of the BBC breaches European rules governing the use of State Aid.*
- *We believe that regulation of all service licences must start from the premise that the balance of BBC output between information, education and entertainment is weighted heavily towards the former two categories and not, as at present, towards the latter.*
- *We also consider there is a need for minimum quotas of UK/EU originated content to be included in remits for all service licences.*

#### **Question 4: building digital Britain**

The BBC has an important role to play in facilitating the switch to digital, but there should be no champion amongst different platforms or particular services. Many smaller channels that SCBG represents are not available on Freeview, because of capacity constraints or because their economics cannot support it. However, they are providing choice and meeting consumer demand, and in so doing attracting new audiences to digital.

The BBC was awarded a second multiplex at a time when there was commercial uncertainty about the viability of DTT (i.e. there was a strong "failing firm" argument for the BBC's publicly funded intervention). But as the market has evolved and effective demand for DTT capacity has grown there is no case for the BBC to retain control of such valuable spectrum, and we believe it should be opened up to new players.

- *Therefore, having successfully "pump-primed" the market, the BBC should be made to relinquish its second multiplex, freeing capacity for new investment and innovation that will lead to greater channel variety than the BBC offers and thereby attracting new audiences to DTT. A sale of this multiplex would also generate significant funds for investment in BBC programming and potentially bring new investment into the promotion of DTT.*
- *We also recommend that the BBC be made responsible for ensuring a neutral approach to the promotion of digital television, in which all platforms have a stake and towards which all channels contribute.*

## Questions 5-6: the BBC's funding

The most significant omission from the Green Paper is its failure to address the public cost of its proposals, without which no properly informed debate can take place. But it seems clear that the net effect of Government policy is that the Licence Fee must now rise even more rapidly than in recent years. The paper points to possible savings that the BBC might - though is not guaranteed to - make, but these are tiny compared with the scale of new responsibilities and requirements that the BBC must fulfil.

On the basis of the *present* BBC remit and responsibilities, and at a time when other public institutions have had to be content with lower-than-inflation settlements, the Licence Fee has been rising annually at inflation plus 1.5%. This formula, even if inflation remained at its present modest level, would produce a £150 licence fee in the life of the next Parliament. Yet under the Green Paper proposals, the BBC is required to carry out many new and costly tasks. To fulfil the Government's digital policy, it must:

- Develop new interactive and web-based services
- Promote the development of a free digital satellite service
- Extend the availability of its services on alternative platforms, and on-demand.
- Provide digital TV coverage in 98.5% of UK households.
- Extend digital audio broadcasting coverage to 90% of the population
- Lead the establishment and management of digital switchover
- Lead the switchover public information campaign and promote the benefits of digital television.
- Implement *and pay for* schemes to make reluctant consumers switch to digital.
- Provide adequate access across all media platforms for viewers and listeners with sensory impairments

These are significant new responsibilities with equally significant expenditure and staffing implications. Funded by the licence fee, our calculations suggest that inflation plus 3.5% rather than 1.5% will be the *minimum* needed unless the BBC radically reduces other activities. So the nation should expect a £200-per-home Licence Fee before digital switchover is complete. For the majority of households, able at last to choose the services they want and reject others, a compulsory £200 subscription to services they have not chosen is unlikely to be welcome.

- *We believe that the calculation of future licence fee should have zero above inflation as its target. This can be achieved by genuine savings in BBC expenditure, including a radical appraisal of BBC services that duplicate those of the commercial sector - ranging from TV channels and Internet content to local radio.*
- *This appraisal should include examination by the NAO, under whose scrutiny all BBC accounts and expenditure should in future fall, without exception.*

- *The Government should publish an early forecast of future licence fees to assist informed debate about the cost-effectiveness of the BBC's services.*

### **Questions 7-10: governance, regulation and accountability**

As Lord Burns' Panel's report said, "the BBC's remit needs the external discipline of being assessed by measures independently defined, that can judge its distinctiveness in relation to the commercial market's provision". We agree with their contention that if such a test is based solely upon criteria set by the BBC, using data and measures defined by the BBC, it will lack conviction. Unfortunately, the Green Paper does not allow for a truly independent and evidence-based approach as recommended by Lord Burns.

It suggests that the required level of independence is guaranteed because judgements will be made not by a Board of Governors, as at present, but by a new "BBC Trust". However, the Trust's exclusive responsibility, like that of the Governors, will be the direction and regulation of the BBC. We judge that in practice the distinction between the BBC and the BBC Trust will be no easier to observe than the present distinction between the BBC and its Governors. We believe that the Burns Panel's alternative recommendation of an independent Public Service Broadcasting Commission (PSBC) is far-sighted and practical, and would become increasingly relevant in the rapidly changing digital age. In our view, the Green Paper's arguments against it carry little weight. Its proposed new structure of a BBC Executive Board *including non-executive directors*, and a separate non-executive Trust to which it is responsible, lacks both the standards of modern corporate governance and the necessary degree of truly independent regulation. Whether the same non-executive directors would appear on both bodies is an important issue not made clear in the Green Paper. But in either case the "Trust" concept fails to address the central problem, so recently brought into sharp focus by Lord Hutton, that it is untenable for the regulation of the BBC's activities to remain in the same hands responsible for its direction and defence.

The PSBC is a constructive solution for the governance of the BBC and for maintaining its place within the changing communications ecology. It would command respect within the broadcasting industry and with the public. Since it would be demonstrably independent of any broadcasting organisation and also of Government, it would be trusted in a way that no body exclusive to the BBC and appointed by Government could possibly be, even if "Trust" were in its title.

- *We believe therefore that the idea of the BBC Trust should be abandoned, and the PSBC proposal re-examined, refined and adopted in its place.*
- *Under its new regulator, the BBC should make an explicit and over-arching commitment to complement and not to imitate or replicate provision from other broadcasters and service providers.*
- *There must be an objective, independent, mechanism for making judgments about the BBC's performance against this and other criteria.*

- *The public and the BBC's competitors must be allowed direct access to the BBC's governing body in the event of complaints.*

### **Questions 16-17: the scope of BBC's publicly funded services**

As the Green Paper acknowledges, "the market is delivering a vast array of choice to consumers". But the equally vast scale and ambition of the BBC nevertheless looms over the market, restricting its growth, deterring investment, and spending public money where private money could deliver the same service more efficiently. Ofcom acknowledged this "crowding out" effect in the Phase 3 report of its Public Service Broadcasting Review: "We agree that [the risk that public funding will crowd out potential private investment in PSB content] does exist, especially in emerging and niche markets – and so we believe that steps should be taken to ensure that broadcasting markets work better". It warned against the "significant chilling effect [of public funding] on commercial investment". This is yet further independent evidence that the BBC has become the creator of market failure rather than the remedy for it. Its remit and scope need to be re-appraised in this context.

For the past decade the BBC has been an aggressive, ineffectively regulated competitor in an otherwise well regulated broadcasting environment, able to spend public money on any competitive venture or activity that it chose. The BBC's framework of self-regulation is opaque and outmoded when compared to the modern requirements of the digital communications market. The result has been to slow the development of the multi-channel sector and to prevent new services and new ideas from flourishing. This is the same behaviour exhibited by the BBC towards independent producers, which was modified only by the imposition of quotas. Independent producers showed that despite its monopoly of public money the BBC did not monopolise the best ideas or the most creative talent. The same is now true of the independent commercial channel sector, and new safeguards must be put in place to ensure that BBC monopoly does not stifle its development.

However, the Green Paper does not give us confidence that the BBC will change its recent policies towards its range of services, their remits, scheduling, commissioning or acquisitions policies. The proposed system of governance and regulation is tied so closely to the BBC and its ambitions that no commercial company can regard it as fair and transparent in restricting anti-competitive behaviour. Indeed, the BBC's response to the Green Paper commits to the appointment of consultants to advise on aspects of fair trading regulation, but this process will be wholly internal with no obligation on the BBC to publish the advice or to be bound by it. This makes a mockery of proposals for reform of governance, is wholly in keeping with our past experiences of dealing with the BBC and fails to provide any confidence that the proposed framework is in any way sufficiently interventionist. Uncertainty, and the lack of effective monitoring and regulation, in turn reduces incentives for commercial players to invest and innovate elsewhere. Moreover, the BBC's new responsibilities for promoting digital take-up are a catch-all that will

allow excessive expenditure in money and airtime on BBC marketing and promotion of its own services.

- *We propose that activities with competitive impact must be clearly defined and regulated in relation to the multi-channel environment, and that such regulation should be wholly under the control of Ofcom or of a Public Service Broadcasting Commission. No BBC body will have the support of the commercial sector in this respect.*
- *This assessment of competitive impact must apply to all current services, and not merely to the BBC's proposals for new or modified activities.*
- *We believe that any measurement of "public value" applied to BBC's programmes and services must be independent and objective, based on criteria that all stakeholders in the industry can accept, including a defined market failure test. In addition to the highly general criteria that the BBC and the Green Paper propose, there must be added a measure of cost-effectiveness.*
- *We support the Green Paper's tentative suggestion (5.43) that a threshold should be set beyond which the market impact of a BBC activity should be deemed unacceptable, especially if it risks foreclosing or significantly lessening competition.*
- *As a first step towards this approach, we believe that a limit should be set on the amount of public expenditure and airtime on the BBC's promotion of itself, its programmes and its services.*
- *The second immediate action required in relation to market impact is to produce tighter regulation of the BBC's behaviour in the "secondary rights" market. A free market and free flow of secondary rights will benefit creativity and the strength of the independent sector, and provide viewers with a wider range of content on secondary channels.*

### **Questions 18-19: the scope and regulation of commercial services**

We agree with the recognition in the Green Paper that the BBC needs to be both more accountable to its stakeholders, the licence fee payers, and to its commercial competitors who may be disadvantaged unfairly. The multi-channel sector has a longstanding concern about the commercial impact of funding arrangements, regulation and promotion of BBC commercial ventures, in particular the cross-subsidy of commercial activities, and we need greater clarity from the new BBC Charter.

The current lack of transparency with regard to the BBC's accounts hinders third party scrutiny of the nature of the financial relationship between public service and commercial activity. Without transparency, we are also unable to determine whether the licence fee is being used to cross-subsidise commercial services or whether licence fee payers receive good value for money from the BBC's operation of commercial activities. The recent internal commercial review conducted by the BBC served to highlight its poor performance, and this information should not only come to light at the time of Charter Review. In our view the BBC's performance should be scrutinised

more closely and commercial ventures should be required to earn a market return within a certain time period or they should be withdrawn.

Recent experience of our members in raising issues of regulatory importance with the BBC Governors has served only to demonstrate the worrying lack of transparency and independence in the handling of complaints. Third parties do not benefit from equal (to the BBC management) access to the Governors during the processing of complaints and, unlike the BBC, have no right to be present or to present evidence at meetings of relevant Governors' committees. This is an abuse of regulatory privilege and does not conform to best practice regulation.

There is a significant gap between the high level principles established in the Charter and the policies implemented through the BBC's various fair trading related documents (including the Fair Trading Commitment, the Fair Trading Guidelines and other specific guidelines, such as that which applies to on-air trailing of commercial products). The discretion granted to the BBC to then, in the absence of external consultation or market impact assessment, adopt new policies that may have a distorting impact on affected markets is unjustified. As a practical matter the BBC must develop new policies and regulatory positions between Charter reviews. The risk that the lack of effective regulation of the BBC's commercial activities could undermine the BBC's core public purpose and lead to a breach of State Aid rules means that such policy development should be subject to formal consultation, with final approval by Ofcom.

Furthermore, the preferred partner status granted to BBC Worldwide serves as a barrier to third parties approaching the BBC with ideas for the commercial exploitation of publicly funded intellectual property. As such, this insulates BBC Worldwide from market discipline, provides no incentive for BBC Worldwide to become more efficient and denies licence fee payers best value returns on their investments.

- *We therefore welcome the proposal to involve Ofcom more closely in regulating BBC commercial activity, and consider it needs specific powers to address the issue of cross-subsidy.*
- *In addition we suggest that the NAO be given an explicit role in determining whether the BBC's commercial services offer best value for public money.*
- *There must be consultation on the BBC's fair trading policies before implementation, with final approval by Ofcom.*
- *The handling of complaints must be overhauled, with transparency and equivalence of the treatment of complainants and the BBC at the heart of any new approach.*

## **Question 20: the system of public service broadcasting**

It is inevitable, regardless of Charters or Acts of Parliament, that public service broadcasting in the digital age will consist of a plurality of providers

serving a plurality of media. On commercial multi-channel television there is already more Mozart than on the BBC, more health advice than on Channel Four, more news - independent and impartial - than on ITV, and more high-quality drama than on Five. Yet the Green Paper does not recognise this reality, opting instead to "wait and see" on a wide variety of issues until digital switchover is complete. But in doing so, the Government is missing an opportunity to bring in new private partners.

The reality is that the commercial, multi-channel sector is already supplementing and frequently outstripping the four designated Public Service Broadcasters in its provision of high-quality programmes of social value. It is reaching audiences, such as 12-24 year olds, who are migrating away from traditional channels in huge numbers. It is broadcasting to cultural and ethnic minorities in their own languages. It is providing specialist factual and educational services to viewers interested in history, music, nature, art or science.

It is through this sector that new public service growth will come, if it is permitted, incentivised, and not faced either by an over-mighty BBC or by a new publicly funded competitor in the form of Ofcom's putative PSP. Government has already recognised, in its direct funding of The Community Channel and Teachers TV (both members of SCBG), that public service can be as efficiently delivered by small specialist channels with dedicated remits as by giant organisations and dominant brands. Future public service broadcasting policy must take account of this, rather than fight against it, and foster the ability of non-terrestrial broadcasters to deliver valuable programmes cost-effectively to those audiences who have chosen to watch them.

One way to do this would be to follow the Burns Panel's recommendation and allow a new Public Service Broadcasting Commission to allocate some licence fee funds to broadcasters other than the BBC. Another, suggested by Ofcom, is that some commercial broadcasters might volunteer for and be granted PSB status, along with its privileges and obligations. We recommend that both these proposals be developed quickly, and not in the long-term future as suggested by the Green Paper.

A further and related issue is the role of ITV, which it would be timely for Government to assess alongside its BBC Charter Review. At present, released prematurely from most of its public service obligations yet maintaining its public service privileges, and the leverage that this gives it in the digital arena, ITV represents an anti-competitive threat to independent multi-channel services. The remaining obligations that remain in ITV's output should be clearly delineated, and public subsidy reduced to a commensurate level, or removed entirely.

- *We propose that a review of alternative public funding options should take place at the beginning of the new BBC Charter, so that they can be put into place midway through its ten-year life.*

- *We believe that "contestable public funding" is the most appropriate way to achieve a plurality of top-quality providers of desirable content, and to ensure that the widest possible range of ideas and voices are made available to consumers.*
- *We recommend that Charter Review be accompanied by a simultaneous appraisal of ITV's activities, and in particular its expansion into new channels and services that benefit from public service status and cross-promotional leverage when no commensurate public benefit is being offered*

## **Conclusion**

The BBC is a respected and highly valuable organisation. But it should be acknowledged that its unitary structure and established attitudes produce a rigid and homogeneous approach to programme making, a narrow range of voices, accents and opinions on screen and on air, and an unjustified assumption of its cultural authority. There are other approaches, other voices and other values that have equal validity and serve audiences as perfectly. They are exemplified by the best in private multi-channel broadcasting and should be reflected in the White Paper for the role they can play in delivering plurality, diversity, cost-effectiveness and consumer sovereignty.

The BBC must remain the cornerstone of public broadcasting. But it must not also carve the gravestone of the independent multi-channel sector, which is already offering much of value to the social, educational and creative fabric of the UK and can be an increasing contributor to public good.

For further information contact:

Charlotte Wright  
Executive Director  
[charlotte@scbg.org.uk](mailto:charlotte@scbg.org.uk)

John Hambley  
Chairman  
[john@scbg.org.uk](mailto:john@scbg.org.uk)

*This statement represents the position of SCBG but does not necessarily represent the view of every individual member in every respect.*