

## **Your comments:**

In broad terms, we are entirely supportive of Ofcom's approach to complaints handling, and to its current proposals.

Ofcom seems to us to be an exemplary regulator, in the manner in which it handles complaints. Ofcom has substantially achieved its goal of being a 'light touch' regulator - but at the same time not afraid to go 'heavy' when appropriate.

The one comment we make is that it is a symptom of our society that citizens now feel able to complain almost on whim, and often for no reason other than their personal view of a programme. It is becoming easier to complain to a regulatory authority than to make even the most basic attempt at complaining to the provider of the 'problem' service.

We feel therefore that there is a need for a stronger sense of 'proportionality' in responding to complaints, which takes at least some account of the standpoint of the complainant.

Complaint investigations can be exceedingly onerous, for both Ofcom and for the broadcaster. If only a tiny percentage of viewers complain (some of whom may have their own prejudices when complaining), it is surely appropriate for Ofcom to assess at the outset what the possible outcome might be, even if the complaint was found to be valid. If the 'worst' that could happen is a note to the broadcaster of a breach of some element of the Code, then surely a more efficient process would simply be for an Ofcom official to pass the complaint to the broadcaster, noting that there MIGHT be a possible breach, and that they should take note of the complaint. If the same broadcaster is the subject of many similar complaints, Ofcom should then decide to mount a more complete investigation.

It is also surely appropriate that a viewer should first take up a complaint with the broadcaster, and only if (s)he is unsatisfied with the response, then take matters forward with Ofcom - who in turn can and should make a quick assessment as to whether the broadcaster has in fact already reasonably dealt with the complaint.

It is difficult to see if the changes proposed in Section 2 of the consultation will lead to a 'lighter' regime such as described above. But we earnestly suggest that Ofcom should consider such an approach. Ofcom needs to reduce its costs, yet it seems that the level of complaints is rising - and that this more due to increasing propensity of viewers to complain, than to reduction in standards.

It is therefore imperative that Ofcom finds ways of reducing the number and depth of investigation in complaints which it has to handle.