



British Broadcasting Corporation
Broadcasting House, London W1A 1AA

British Broadcasting Corporation
BBC Legal Department, London Broadcasting
House
5th floor Zone F, Portland Place, London W1A 1AA

Information Rights
bbc.co.uk/foi
foi@bbc.co.uk

Rob Watson
robwatson@decentered.co.uk

11th September 2025

Dear Rob Watson,

Freedom of Information request – FOI2025/01444

Thank you for your email of 13th August. The BBC is replying under the Freedom of Information Act 2000 (**“FOI Act”**). You asked:

“Freedom of Information Request - Basis for the Claim "The Only Station Made in Leicester for Leicester"”

This request concerns BBC Radio Leicester's promotional strapline "The Only Station Made in Leicester for Leicester," heard as an on-air jingle at about 08:21 on 13 August 2025. I am not seeking programme content or editorial material. I am seeking corporate communications, marketing, compliance, and governance records that substantiate a promotional claim.

Please provide the records held for purposes other than journalism, art or literature, as follows:

First, the written rationale and approval documents that set out the intended meaning and basis of the claim, including any brand, marketing or positioning papers, campaign briefs, sign-off forms, risk or legal reviews, and any advice from Editorial Policy, Legal, Corporate Affairs or Audience teams.

Second, any substantiation or corroboration gathered before use of the claim, including market scans or comparisons with other Leicester-area services, definitions used for "made in Leicester," criteria used to assess "only" status, and any datasets or analyses relied upon. If RAJAR or other published sources were cited internally to support the claim, please disclose those citations and extracts. I am not asking you to create

new analysis. RAJAR is referenced here only as an example of a published source sometimes used in market context. I am not seeking RAJAR data per se; I am asking for any internal reliance on such sources in substantiating the strapline.

Third, the compliance assessment that considered the claim against the BBC Editorial Guidelines on Accuracy, including any internal correspondence, memos or meeting notes that record how the claim was tested for accuracy and fairness, and any conditions attached to its use.

Fourth, documents that record how the claim aligns with BBC local production and scheduling practice for the relevant period. For context only, analysis of the BBC Sounds schedule for Saturday 9 August to Friday 15 August 2025 indicates approximately 43% local hours, 44% East Midlands regional hours and 13% national hours across 06:00-24:00; and at the weekend 8 of 36 hours (about 22%) were local and were sports shows. Please disclose any authoritative breakdowns held that confirm, correct or otherwise set out the local, regional and national hour allocations used internally for BBC Radio Leicester during that week and the adjacent weeks.

Fifth, the procurement or commissioning records for the imaging or jingles that carry this strapline, including purchase orders, statements of work, or instructions to suppliers that specify the words used. Commercially sensitive pricing may be redacted if necessary, but please disclose the existence, dates and scope of such contracts.

If you believe any part of the request falls within the journalism derogation, please apply section 16 and identify which parts you consider outside scope and which are in scope, then disclose the latter. For any exemptions applied, please cite the specific exemption and provide the public interest factors considered. If the cost limit is engaged, please advise how I can refine the scope. Electronic copies are preferred.

This request is limited to records created, updated or relied upon between 1 July 2024 and the date of your search."

Response

We recognise that you have asked for the records held for purposes other than journalism, art or literature, however we consider the BBC Radio Leicester's recent promotional strapline of "the Only Station Made in Leicester for Leicester" and everything connected to it to be out of scope of the FOI Act and don't consider that we hold anything for any other purpose.

However on this occasion, we are happy to voluntarily provide the below information in response to your request.

This line was used just over once a day (around 8 times in a week) for a short-term trail, ending on 15th August, intended to reassert BBC Radio Leicester as a station based in the city and serving communities across Leicester, Leicestershire and Rutland. It was created in-house by our local team at Jubilee Square by people who work in the city and focus on reflecting Leicester's unique identity.

The message was designed to highlight the withdrawal of locally made commercial radio from Leicester in recent years. Brands such as Capital and Hits continue nationally, but their content is no longer produced in the city. That has meant fewer opportunities for Leicester's stories and voices to be heard. Our intention was to underline that BBC Radio Leicester has a universal offer of local programming alongside international, national and local news.

However, we recognise that in saying we were "the only" station made in Leicester, we frankly overstated our case. Community radio stations play an important role in the city's media life, often serving audiences and interests that would otherwise go unheard. We regret that our campaign did not acknowledge their contribution. That was never our intention, and we should have been clearer.

We are discussing how we approach this in future so that we highlight our comprehensive service without diminishing the work and contribution of others.

Review and appeal rights

In cases where we determine that the requested information is held for the purposes of journalism, art or literature, we do not offer an internal review. However, you can ask the Information Commissioner to decide whether the BBC has done what the FOI Act requires. Complaints can be made online at <https://ico.org.uk/make-a-complaint/foi-and-eir-complaints/>. Other 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

BBC Information Rights

Additional Information:

Information held for the purposes of journalism, art or literature

As a publicly-funded organisation, the BBC seeks to be open, transparent and accountable. The BBC makes available a wealth of information about its services, management and finances through its website at <https://www.bbc.co.uk/>. The Freedom of Information Act 2000 (the “FOI Act”) generally gives a right of access to recorded information held by public authorities, including the BBC and the other publicly-owned broadcasters – Channel 4, S4C and MG Alba.

However, alongside the public interest in accessing information, the FOI Act reflects the critical importance of these broadcasters in UK society, including the BBC’s mission to enrich people’s lives in the UK and around the world with programmes and services that inform, educate and entertain. The FOI Act therefore applies to the BBC, Channel 4, S4C and MG Alba only in the case of information “held for purposes other than those of journalism, art or literature”: see Part 6 of Schedule 1 to the FOI Act.

We can confirm that the FOI Act does apply to information we hold about the management and running of the BBC, i.e. the direction of policy, strategy and resources which provides the framework within which a public service broadcaster conducts its operations. However, the law recognises that if the FOI Act applied to information held for the purposes of creating the BBC’s output (TV, radio, online etc), or information that supports and is closely associated with these creative activities, the BBC’s ability to deliver its mission would be severely hampered.

For example:

If a company suspected that the BBC was investigating allegations of malpractice and was able to request access to all the information the BBC held about it, the investigation could collapse.

If a competitor could access details of BBC newsgathering operations, the way it makes its shows or details of the programmes it plans to broadcast, the BBC would be put at a serious commercial and operational disadvantage.

If the BBC was at risk of having to reveal details of how particular editorial decisions were made, its editors, producers and journalists would not feel free to express themselves candidly.

It is of course essential that high standards of accountability are maintained at the BBC. However, there are other ways, apart from the FOI Act, to ensure this, such as the BBC's own complaints and investigations procedures. In addition the BBC is subject to external scrutiny by Ofcom and Parliamentary bodies such as Select Committees and the National Audit Office.

In an important case (*Sugar v. BBC* [2012] UKSC 4) the UK Supreme Court decided this exception covered:

“first, the collecting, writing and verifying of material for publication; second, the editing of the material, including its selection and arrangement, the provision of context for it and the determination of when and how it should be broadcast; and third, the maintenance and enhancement of the standards of the output by reviews of its quality, in terms in particular of accuracy, balance and completeness, and the supervision and training of journalists.”

The court also recognised that:

“Self-critical review and analysis of output is a necessary part of safeguarding and enhancing quality. The necessary frankness of such internal analysis would be damaged if it were to be written in an anodyne fashion, as would be likely to be the case if it were potentially disclosable to a rival broadcaster.”

The BBC has determined that some or all of the information you have asked for is held for the purposes of journalism, art or literature, and so the FOI Act does not apply to it. In this case, we are therefore declining to disclose that information.