

# Media Reform Coalition submission to House of Lords Communications and Digital Committee inquiry on BBC Future Funding

## About the Media Reform Coalition

Since 2011, the Media Reform Coalition has been at the forefront of the media reform movement, producing evidence and giving oral testimony to a broad range of public enquiries into the media. Our particular concerns relate to media accountability, democracy and pluralism, and the future of public service media (PSM) has become central to much of our research, analysis and advocacy.

For the past year, the Media Reform Coalition has been running the *BBC and Beyond* campaign (funded by the Joseph Rowntree Charitable Trust) developing a vision for a media system fit for the future. Our broad-based consultation engaged 30,000 people from all the home nations and across the UK. Out of which we created a *Manifesto for a People's Media*,<sup>1</sup> which includes proposals for transforming the BBC and Channel 4, as well as supporting independent media. This response draws on the wide-ranging views and perspectives from across civil society that we encountered through this consultation.

## Submission summary

The future broadcasting landscape is likely to see a continuation of the trends of the past decade, which together pose major challenges for the media and communications ecology as a whole. However, if a government were to recommit to core principles of a universal service which supports independent journalism, active citizenship and mutual understanding, there is no reason that changes in technology or consumer habits should undermine the long-term viability of public service media (PSM).

The BBC plays an essential role in the UK's media landscape. Yet we cannot simply defend the institution as it currently exists. We have to recognise the extent to which government interference, funding cuts and commercialisation has undermined its public mission. In terms of the BBC's funding mechanism, we have long made it clear that we do not believe that the status quo is satisfactory. The licence fee system has the advantage that all the BBC's domestic audience is in economic terms equally important, in contrast to market-based funding models. However, it has a number of problems, including a lack of independence from government, not reflecting the ability to pay, and being an outdated 'television' licence fee at a time when audio visual content is increasingly delivered online. We therefore propose the introduction of a new digital licence fee.

In order for a new digital licence fee to ensure equity and universal access, it would have to be underpinned by universal public digital infrastructure. With the shift towards digital delivery, it is vital that high quality broadband is made available to maintain universality in PSM and to

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<sup>1</sup> Grayson, D. (2021). [Manifesto for a People's Media: creating a media commons](#). Media Reform Coalition.

guarantee citizens' equal rights to access information. A public guarantee of affordable full-fibre broadband to all households should therefore underpin a new public digital media system.

We believe that alongside this shift towards a new public digital media system there is untapped potential to transform the BBC by devolving decision-making and using digital technologies to make it far more democratic and participatory. This is a more holistic transformation than just a list of policy demands – it is about fundamentally reimagining the relationship between the BBC and its audience. We have outlined comprehensive plans for building a 'People's BBC' which would be *independent, accountable, democratic and for everyone*. This transformed BBC would be widely trusted and embedded in people's lives, providing content which is seen as distinctive and valuable, and which commands widespread support for a collective funding model.

A People's BBC would have a different kind of relationship with the wider public. Rather than just interacting with it as passive audiences, many people would participate in making decisions about how it was run. Rather than being a distant, abstract institution, the relationship would be much more local and immediate, with most decisions being made regionally, and the workforce being representative of all the communities of the UK.

A People's BBC would also have a collaborative relationship with independent media, distributing news and cultural content from smaller producers to wider audiences. All these measures would mean that the news and information coming from these institutions would be widely trusted to be accurate and to hold powerful interests in wider society to account; the data they produce would be used for the public good; and the cultural content would be innovative, representative of diverse lives, and foster creativity all across the UK.

## **1. How will new technologies and consumer habits change the future broadcasting landscape?**

The future broadcasting landscape is likely to see a continuation of the trends of the past decade, such as:

- a continued decline in linear TV viewing, especially in younger demographics, as more people primarily access content on video on demand and streaming services
- financial pressures from inflation within TV production, combined with declines in TV advertising revenue as this moves online, with commercial public service broadcasters seeking to further reduce their obligations in response to these pressures
- continued dominance of US-based tech monopolies controlling much of the digital space

These factors pose major challenges for the public media ecology as a whole. However, technology and consumer habits are not the only elements to be taken into account – the wider political environment, including public health emergencies, the climate crisis and a possible breakup of the UK will all impact the sector significantly. Crucially, if governments are willing to step in to protect the core values of public service media and create an enabling environment for them, we could see substantially different outcomes than if 'market forces' are left to play out without intervention.

Given that currently – with privatisation of Channel 4 still very much on the political agenda – market forces are still seen as the only way forward, PSM faces a bleak future. The potential consequences are dire. On the other hand, if a government were to recommit to a universal service which supports independent journalism, active citizenship and mutual understanding,

there is no reason that changes in technology or consumer habits should undermine the long-term viability of PSM.

## 2. What is the purpose of a national broadcaster?

While the question refers to a ‘national’ broadcaster, we presume the focus is on public service broadcasting. Public service refers to a media ecology and set of regulations that foreground the public interest ahead of economic or partisan political interests. Its underlying principles ought not to be reducible to narrow concepts of ‘value for money’ or the ‘national interest’, but commitments to universality and citizenship, independence, transparency, redistribution and diversity.<sup>2</sup> Public service media environments have demonstrable political and cultural benefits. Research shows that where independent and viable public service broadcasting exists, citizens are better informed about public issues.<sup>3</sup>

The rationale for public service broadcasting requirements is simple and well-known. According to Ofcom: ‘Public service broadcasters differ from other commercial broadcasters in that they are required to provide services that fulfil societally valuable purposes across their range of programmes, including the provision of genres of particular societal value ... Other content providers may (and do) produce programmes which have societal value, but they do not have an obligation to do so and the continued provision of such content will always be determined by its commercial viability. ... Some genres will tend to be underprovided by the market, such as news (including regional news), arts, religious and children’s programming due to a range of commercial factors. Without a regulatory intervention, there may also be limited provision of content that has a uniquely UK cultural perspective or sensibility as these tend not to sell well to other markets.’<sup>4</sup>

There are a number of key roles a national public service broadcaster should play – providing a universal service, representing the diversity of ways of life across the nation, investing in good jobs in the wider television sector, and fostering innovation. We address each of these below.

*A national broadcaster should provide a universal service.*

The principle of universality is crucial. The Puttnam report<sup>5</sup> defines universality and public service media according to the following principles – that it:

- is available to everyone, so no one is excluded because of their location, physical abilities or ability to pay
- provides a wide mix of genres and content
- produces popular content that reaches mass audiences
- creates spaces for *intracultural* conversations which cater for the interests and needs of minorities
- hosts *intercultural* spaces which allow minorities to communicate with each other and with cultural majorities

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<sup>2</sup> Puttnam, Lord (2018). [A Future for Public Service Television](#).

<sup>3</sup> E.g. Curran, J., Iyengar, S., Brink Lund, A. & Salovaara-Moring, I. 2009. ‘Media System, Public Knowledge and Democracy: A Comparative Study’, *European Journal of Communication* 24 (1): 5-26

<sup>4</sup> Ofcom, 2020. [Small Screen: Big Debate Consultation – Annex 6. Why public service broadcasting still matters](#), 8 December.

<sup>5</sup> Puttnam, Lord (2018). [A Future for Public Service Television](#), 2018

The pandemic has underscored the value and benefits that audiences look to PSM for. In its recent recommendations to the government on the future of PSM, Ofcom said: ‘Our research consistently shows that high-quality trustworthy and accurate news is one of the most important aspects of public service broadcasting on both a personal and societal level. ... In the first week of the Covid-19 pandemic, the percentage of people who said they trusted information from the public service channels was over 80%. This compared to 30% of people who trusted news from websites/apps of online news organisations (such as BuzzFeed, Huffington Post, Vice) and 55% who trusted printed newspapers.’<sup>6</sup>

Netflix and the Disney Channel may have *entertained* UK audiences during the pandemic, but neither was able to *inform* or *educate* the different publics within the UK – an especially important remit at a time of local lockdowns and widespread disruption of schooling. Far from making PSM obsolete, the growth of streaming services makes it clear how important it is to support distinctive, locally produced programming aimed at the UK’s diverse audiences.

*A national broadcaster should reflect the diversity of communities, regions, accents, perspectives and ways of life across the entire country.*

The growth of the streaming sector makes it even more important that the UK has PSM whose remit requires them to commission UK-originated programming. As the Commons DCMS Committee noted in its recent report on public service broadcasting, ‘PSBs have been described as underpinning the wider creative economy and whilst SVoDs are beginning to invest more in production in the UK, the number of UK-originated content hours is hardly comparable. In 2019, PSBs provided approximately 32,000 hours of UK-originated content, whereas Netflix and Amazon Prime combined provided 164 hours.’<sup>7</sup>

Research from Enders Analysis has shown that even when programmes commissioned by streaming services are set and produced in the UK, they have fewer British idioms and references because they are aimed at an international audience.<sup>8</sup> This trend will inevitably lead to greater underrepresentation for the nations and regions outside of London, since these are more unfamiliar internationally.

*A national broadcaster should encourage investment in SMEs which guarantee good working conditions, prioritise underrepresented groups etc. in order to raise standards across the sector.*

PSM also plays a crucial role in the television industry, providing investment, training and creating an environment in which channels compete on the basis of quality, rather than revenue. Channel 4, with its publisher-broadcaster model, led the way in this, but the BBC has come to play an increasing role in this arena through its external commissioning. However, the evidence of the move towards outsourcing over the last few years has already shown that, where first a thousand independent flowers bloomed, over time independent British production houses have been swallowed up by large (mostly) US-based companies. Commissioning is increasingly

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<sup>6</sup> Ofcom, (2021) [Small Screen: Big Debate – Recommendations to Government on the future of public service media](#), 15 July, p. 21-22

<sup>7</sup> House of Commons DCMS Committee (2021). [The future of public service broadcasting](#), House of Commons 17 March.

<sup>8</sup> Enders Analysis, 2021. [Outsourcing culture: When British shows aren’t ‘British’](#), 9 March.

captured by the so-called Super Indies which account for around 38% of all revenues across the television sector, despite making up only 1% of the industry.<sup>9</sup>

Furthermore, unlike in-house production, there are also no requirements to monitor independent companies for equalities, representation or working conditions. The purpose of a national broadcaster should be to encourage growth in British independent media and to ensure best practice in terms of equalities, representation and working conditions in the TV production sector.

*A national broadcaster should be encouraged to lead the way with innovation in the public interest, creating tools and resources which are freely available to all as public goods.*

A final crucial role for national broadcasters is in innovation. The academic evidence is clear that far from inhibiting commercial competitors, a well-funded PSM sector which is enabled to innovate has largely positive effects on the entire industry.<sup>10</sup> The success of the iPlayer, shows the value of enabling this kind of innovation – it is most unlikely that a similar development in the private sector would have provided such material benefits to audience members. Yet in the last 15 years, concerns about ‘market impact’ have shut down valuable innovations such as the BBC Jam education platform, which would have been of huge benefit to the public in the context of the pandemic.

National broadcasters should be encouraged and enabled to centre their public mission, including where the public good is best served by creating innovative tools and resources, rather than being stymied by assumptions about their possible negative impacts on commercial markets.

### **3. What principles and priorities should inform the choice of the BBC’s funding model? And how would any alternative funding models affect what the BBC can provide?**

The Media Reform Coalition has long made it clear that we do not believe that the status quo in terms of the BBC’s funding mechanism is satisfactory. The licence fee system has the advantage that all the BBC’s domestic audience is in economic terms equally important, in contrast to market-based funding systems. However, it has a number of problems, including a lack of independence from government, not reflecting ability to pay, and being an outdated ‘television’ licence fee at a time when audio visual content is increasingly delivered online. We therefore propose the introduction of a new digital licence fee.

However the licence fee is updated, the BBC’s future funding must:

- guarantee universality of access, especially in the transition to digital provision
- be fair and reflect the ability to pay
- provide a sustainable funding source that ensures the independence from government and from commercial pressures.

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<sup>9</sup> Ofcom, 2020. [Small Screen: Big Debate Consultation – Annex 7. The role of PSBs in the UK TV production sector](#), 8 December, p. 9

<sup>10</sup> Mazzucato, M. et al. 2020. [Creating and Measuring Dynamic Public Value at the BBC](#). UCL/BBC, December.

## *Universality*

It is not the case that the internet and commercial channels have made the need for universal access redundant. There is a growing body of evidence suggesting that people living in more commercially driven media environments, without the stimulus of high quality non-commercial programming, are far more narrowly informed than those living in countries in which there is a well supported public media sector.<sup>11</sup> This has become more, rather than less, important as evidence grows of the way in which the internet, rather than broadening access to services that ‘inform, educate and entertain’, in fact narrows access, because of the impact of social media and the algorithms that are employed to make it operate effectively.<sup>12</sup>

In order for a new digital licence fee to ensure equity and universal access, it would have to be underpinned by universal public digital infrastructure. With the shift towards digital delivery, it is vital that high quality broadband is made available to maintain universality in PSM and to guarantee citizens’ equal rights to access information. A public guarantee of affordable full-fibre broadband to all households should therefore underpin a new public digital media system.

## *Fairness*

The television licence fee – a flat ‘tax’ paid for by virtually all households irrespective of their economic status – is a regressive means of financing public media. We would like to see a more progressive mechanism which acknowledges socio-economic differentials, and the fact that it is the poorest households who are least able to afford commercial competitors and who are most dependent on PSM.<sup>13</sup> We need a digital licence fee, payable by *all* households that maintains the tradition of universal funding, but which recognises important differences in the ability to pay. Internationally, there are examples of how this can work. In Finland, public media is funded through a progressive individual tax, which is free for those on the lowest incomes; in Germany funding is provided by a household levy paid by everyone, with reductions or exemptions for those on certain benefits.

## *Independence*

We do not believe that the current licence fee arrangements afford the political independence that uncritical supporters like to imagine. Governments have always set the rate of the licence fee, which has meant that the BBC’s major source of funding has always been highly politicised. This dependence on the government is perhaps most acute at present, as the number of TV-licenced households is now shrinking after many decades of continuous growth. This means that without rises in line with inflation the corporation is experiencing real term cuts.

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<sup>11</sup> e.g. Aalberg, T., Van Aelst, P. and Curran, J. (2012). Media Systems and the Political Information Environment: A cross national comparison. In T. Aalberg and J. Curran (eds) *How Media Inform Democracy: A Comparative Approach*, London Routledge. Esser, F., de Vreese, C., Strömbäck, J., van Aelst, P., Aalberg, T., Stanyer, J., Lengauer, G., Berganza, R., Legnante, G., Papathanassopoulos, S., Salgado, S., Sheafer, T., & Reinemann, C. (2012). Political Information Opportunities in Europe: A Longitudinal and Comparative Study of 13 Television Systems. *International Journal of Press/Politics* 17, 247–74.

<sup>12</sup> Phillips, A., Elvestad, E., Feuerstein, M. (2015). Deep and narrow or shallow and wide: a comparative study of how young people find news via social media. Paper presented to the Future of Journalism conference in Cardiff, September.

<sup>13</sup> Standen-Jewell, T. and Harrington, T. (2022). Public service television: something for everyone. *Enders Analysis*, 17 January.

This in turn, is making it more dependent on its commercial activities to make up the shortfall in revenue, meaning that an increasing proportion of the BBC's activities are oriented towards selling to international markets. This inevitably makes it more subject to commercial pressures and less able to centre its public mission. Such moves are particularly concerning in areas which are most in need of protection from such pressures, such as children's programming, which has now been incorporated into BBC Studios.<sup>14</sup> The BBC needs a long-term sustainable public funding settlement to protect these vital public services from privatisation by the back door.

Independence is also undermined by a lack of transparency in the process for assessing the BBC's funding. There is currently a 'closed door' system of negotiations, which has led to outcomes such as the BBC accepting responsibility for over-75s' licences, without sufficient public and parliamentary scrutiny of what the implications of such a decision might be. We agree with the conclusions of the Lords Communications Committee in their 2019 report on public service broadcasting, which said that 'a new, independent and transparent process for setting the licence fee is necessary', such as an independent panel responsible for overseeing the process for setting the licence fee.<sup>15</sup>

Again, there are international examples the UK could follow, including Finland – where funding for public media sits outside the state budget to ensure independence – and Germany, where the rate is decided by the independent KEF. In the UK, we also have the Press Recognition Panel (PRP), resulting from the Leveson Inquiry. This was created to be wholly independent of any other body or influence, and to ensure that regulators of the UK Press and other news publishers are properly funded and able to protect the public.

The PRP's board members can only be removed by the unanimous agreement of the other board members.<sup>16</sup> Its own structures and governance can only be amended by a two thirds majority of each of the House of Commons, the House of Lords and the Scottish Parliament, and with the unanimous agreement of the Board itself. In other words, it is protected from influence from powerful external forces. This could be a model for a new body to determine BBC funding.

We believe it is vitally important that a new system for funding the BBC, based on the principles outlined above, is implemented in the 2027 BBC Charter. Should current arrangements remain for another decade, it seems highly likely that the 2030s will see growing levels of non-payment and a decreasing sense of the institution's relevance, particularly among younger audiences. It will be far harder to make the case for the BBC in 2037 if it is still funded by a regressive television licence and subject to the kind of government interference we see at present.

However, while the licence fee transitions to a new system it is imperative that this is not used as an opportunity to reduce BBC income, or to increase government influence. These changes should also be accompanied by a comprehensive public education campaign to restate the core

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<sup>14</sup> The [stated aim of this move](#), to "maximise the value of existing Children's properties and build new global brands for a range of broadcasters and platforms with a better return on investment from programme development", is a far cry from providing high quality, educational content for children which should surely be the driving force behind production.

<sup>15</sup> House of Lords Select Committee on Communications and Digital (2019). [Public service broadcasting: as vital as ever](#). House of Lords, 5 November.

<sup>16</sup> Press Recognition Panel. [The Board](#). Accessed 8 March 2022.

principles of universality for the digital age, and why it is fair that some people should pay more than others for the BBC, as is currently the case with the NHS.

#### **4. How should the BBC change over the next five years to adapt to evolving consumer habits and needs - and what does the Corporation need to do to prepare for the future in the longer term?**

The BBC plays an essential role in today's media landscape. Yet we cannot simply defend the institution as it currently exists, and have to recognise the extent to which government interference, funding cuts and commercialisation has undermined its public mission. We believe there is also untapped potential to transform the institution, by devolving decision-making and using digital technologies to make it far more democratic and participatory. This is a more holistic transformation than just a list of policy demands – it is about fundamentally reimagining the relationship between our public media and the citizens they serve.

In our *Manifesto for a People's Media*,<sup>17</sup> produced out of the broad-based consultation we conducted as part of our *BBC and Beyond* campaign, we have outlined comprehensive plans for building a 'People's BBC'. This would be widely trusted and embedded in people's lives, providing content which is seen as distinctive and valuable, and which commands widespread support for a collective funding model. A People's BBC would have a different kind of relationship with the wider public. Rather than just interacting with it as passive audiences, many people would participate in making decisions about how it was run. Rather than being a distant, abstract institution, the relationship would be much more local and immediate, with most decisions being made regionally, and the workforce being representative of all the communities of the UK.

The digital infrastructure to support the People's BBC, as well as other kinds of participation in democratic life, would be the responsibility of a British Digital Cooperative.<sup>18</sup> This would work with public media, develop algorithms for video on demand services, and channel large-scale investment to surveillance-free, non-profit digital platforms (e.g. search engines and social networks) so citizens have genuine choices about whether they want to use commercial platforms.

A People's BBC would also have a collaborative relationship with independent media, distributing news and cultural content from these smaller producers to wider audiences. All these measures would mean that the news and information coming from these institutions would be widely trusted to be accurate and to hold powerful interests in wider society to account; the data they produce would be used for the public good; and the cultural content would be innovative, representative of diverse lives, and foster creativity all across the UK.

A People's BBC would be held to core values of being *independent, accountable, democratic and for everyone*.

Independence should be protected through measures such as:

- The BBC's public funding levels being determined by a fully independent body that is protected from government pressure, and can respond swiftly to market pressures and technological change (such as rapid growth of streaming services).

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<sup>17</sup> Grayson, D. (2021). [Manifesto for a People's Media: creating a media commons](#). Media Reform Coalition.

<sup>18</sup> Hind, D. (2019) [The British Digital Cooperative: A New Model Public Sector Institution](#). Common Wealth.

- The BBC's Royal Charter being replaced with a proper legal structure for public service media, so that its remit and constitution can be properly scrutinised by Parliament rather than unilaterally changed by government. After this, future changes should be made through regular reviews which are voted on by license fee payers.
- Senior appointments at the BBC being removed from government control.
- Journalists within public broadcasting being protected by a conscience clause, allowing them to refuse unethical assignments.

Accountability should be ensured through measures such as:

- The establishment of a new independent regulator. This should act purely in the public interest and be responsible for the regulation of the BBC, other public service media, and public service content in commercial broadcasting. This regulator should take over these responsibilities from Ofcom, allowing Ofcom to focus on its other duties. The new regulator should develop a shared architecture with other regulators such as IMPRESS (which would continue to focus on the independent journalism sector) e.g. ensuring complaints are dealt with swiftly.
- The new regulator should also be responsible for online regulation, including harmful content, the impact of algorithms and harmful design.
- All appointments to the new regulator should be independent of government, and senior appointments should be accountable to audiences e.g. through being elected.
- The new regulator should be adequately funded to fulfil its remit, deal promptly with complaints, conduct research and launch detailed investigations so as to minimise harm. The complaints process should be simple and effective so that it is transparent and accessible to everyone.
- The regulator should draw on the Citizen Media Assemblies (described below) to ensure public participation in defining what is harmful, what is meaningful redress, and keeping people informed about their rights, especially in the rapidly changing online environment.
- The regulator should include a racism reporting service to map and address racism within public media, promote the use of appropriate language by journalists e.g. to describe disabled people, and monitor and address workplace harassment and bullying.
- All media content should be subject to a 'right to reply' so valid complaints are able to broadcast or publish counter responses from affected people and communities, with equal prominence to the content complained about.

The BBC should be made more democratic through measures such as:

- Programme making and editorial functions – including how money is distributed – being fully devolved to the nations and regions, so that programmes fully represent the needs and desires of the whole country.
- National and regional boards of the BBC should have worker representation, and also involve the wider public e.g. through allowing licence fee payers to elect members.
- A devolved network of Citizen Media Assemblies should be established to manage commissioning, so more people can have a say on the programmes that get made. These could be structured using the 15 existing BBC nations and regions divisions. Citizen Media Assembly boards should be elected by staff and local licence fee payers, and quotas and affirmative action should be used to ensure broad-based representation.
- News coverage should be regularly reviewed to assess whether it meaningfully represents diverse views and communities, and whether it over-represents official and elite sources. For complex or controversial issues, panels drawn from Citizen Media Assemblies should be established to oversee reporting.

- New forms of participatory commissioning should be developed by Citizen Media Assemblies. These commissioning processes should draw on the history of the BBC Community Programme Unit and Channel 4 workshops, as well as forms of collective resource distribution such as participatory budgeting and grantmaking.
- The BBC should ensure that their workers are representative of wider society, including trainees and those working for external content producers. Rigorous equality monitoring data should be collected to support this, including data on job roles and pay grades. Reasonable adjustments for disabled people should be publicised during recruitment, and incorporated into internal training to ensure managers understand them.
- The BBC should have formal obligations to address casualisation and precarious working conditions, so it's easier for people who aren't wealthy to work for them. BECTU and the NUJ should be involved in developing contracts, which should also take account of the impact of worker rights within the institutions on the wider media sector. Freelancers should also be protected e.g. through implementation of the Freelancers Charter.

The BBC should guarantee a universal service through measures such as:

- The introduction of a progressive digital license pegged to household council tax bands, so that wealthier people contribute more.
- Affordable full fibre broadband guaranteed to all homes.
- The BBC should be used as a mechanism for raising accessibility standards online, by creating digital tools for readability etc and making them publicly available on Creative Commons licences.
- England should adopt the same obligations to provide British Sign Language interpretation for news as exists in Wales and Scotland.
- The whole of the BBC archive should be made permanently publicly accessible worldwide on Creative Commons licences.
- Algorithms on the iPlayer and 4oD should be redesigned to encourage people to encounter a variety of content, similar to the broadcasting schedule, rather than emphasising similarity. These algorithms should be made public to ensure transparency.

##### **5. What actions and consultations are needed from the government to inform its future BBC funding plans?**

Many of the proposals outlined above will not have an opportunity to be implemented until the BBC charter renewal process running up to 2027. However, there are a number of interim steps that the government could take to prepare for the transition to a fair digital licence fee arrangement that preserves universality. These include:

- reasserting and recommitting to core values of public service media as a means of providing content of particular societal value, creating shared cultural experiences and conversations across the nation, and reflecting the diversity of communities across the UK – none of which will be adequately provided by a purely market-based model
- assessing all proposals for the future of BBC funding purely in relation to the extent to which they maximise public value, not in terms of market impact on private competitors
- ensuring and extending universality, particularly in terms of access to digital technologies and data
- extending public service principles into all ventures funded by the licence fee, rather than top slicing it to support commercial ventures. For example, the BBC's Local Democracy Reporter scheme has provided some valuable coverage, but has largely served to prop up failing commercial newspapers rather than supporting independent news organisations

acting in the public interest.<sup>19</sup> Similarly, independent production houses receiving licence fee money as part of external commissioning agreements should have the same requirements to meet equalities duties and provide decent working conditions as in-house BBC production.

- connect plans for devolving the BBC with the Levelling Up agenda, and use them as a means of meeting commitments to devolve power to the regions and devolved nations
- engage in deep and widespread public consultation on what the public values about the BBC, and how and why they consume its services, from a broad cross section of society - including those who do not currently pay the licence fee or do not believe the institution is relevant to them
- as part of this, and in order to start a public conversation about what universality means in a digital age, consult with the wider public on iPlayer algorithms. This should address the extent to which they value personalisation vs. creating a shared digital space which mirrors the principles of the broadcasting schedule (i.e. that there is public value in viewers encountering a diverse range of content, not all of which they have personally chosen). Investigate the possibilities of greater citizen oversight on the kinds of data collected by the iPlayer and how content is displayed and made discoverable.

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<sup>19</sup> Barnett, S and Greenslade, R. (2020). [Not the way to use our money](#). *British Journalism Review*, 2 June.