

**Media Reform Coalition – Submission to Culture, Media and Sport
Commons Select Committee ‘State of Play’ inquiry (February 2025)**

Executive summary

1. **The Culture, Media and Sport Committee covers some of the most important and universally impactful areas of public policy for British society, culture and democracy.** Over the course of this parliament, the UK’s media institutions will face a series of significant, overlapping and potentially existential challenges. To best represent the public interest and address urgent crises and failures in the UK’s media sector, we recommend that the Committee explore the following policy debates during the current parliament:
2. **The review and renewal of the BBC’s Royal Charter**, ensuring the government actively includes and consults the public and licence fee payers in decisions on the future of the BBC, as well as exploring alternative universal public funding models to replace the TV licence fee.
3. **The decline of the UK’s local media**, examining the root causes of the loss of hundreds of distinct local newspapers, radio stations and TV services, as well as exploring alternative models and mechanisms for reviving a diverse and independent local media ecology across the UK.
4. **Implementation of the 2024 Media Act and the future of the UK’s public service broadcasting ecology**, including the effect of deregulated requirements on the provision of public service genres, ensuring continued universal access of PSB content to all audiences, and the impact on UK SME producers from the relaxation of Channel 4’s commissioning model.
5. **The UK’s crisis in concentrated media ownership**, including the failure of mergers legislation to curb the largest companies’ excessive influence over public debate, the consequences of chain ownership on investment in journalism, and the role of online intermediaries in entrenching the market power of dominant media companies.
6. **Regulating Big Tech in the public interest**, including the justifications for and public distribution of any levies, exploring imposing public interest obligations on dominant Big Tech companies, and scrutinizing the CMA’s designation of platforms with ‘strategic market status’ under the Digital Markets, Competition and Consumers Act 2024.
7. **How the Committee conducts its inquiries into media policy is just as vital to the effectiveness of its work as the choice of topics and policies that the Committee investigates.** The Committee needs to ensure that it speaks to and for the public in its investigations, and engages more openly and regularly with independent media outlets and civil society groups. The Committee should strive to undertake and interrogate qualitative analysis of the impact of UK media, and recognise that the challenges facing the UK’s media sectors can no longer be addressed in isolation from one another.

The current media policy context

8. Since 2011 the **Media Reform Coalition** has been at the forefront of the UK's media reform movement. We produce original evidence and give expert testimony to numerous public enquiries into the media, and work with and coordinate a diverse coalition of civil society groups, researchers, activists and independent media. We regularly publish research reports and policy proposals on media plurality, public service broadcasting, independent public interest journalism and a digital media commons.¹ Our flagship '*Who Owns The UK Media?*' report² is regularly cited as the authoritative source on ownership concentration and changing industry dynamics across the UK's media sectors. In 2011 we were instrumental in first establishing and then contributing to the Leveson Inquiry, and our BBC & Beyond project, about reimagining public media for the 21st Century, spoke to over 30,000 people across the UK. More recently we were instrumental in securing vital amendments to the Media Bill 2024 to protect citizens' interests in public broadcasting regulation.
9. The Culture, Media and Sport Committee covers some of the most important and universally impactful areas of public policy affecting British society, culture and democracy. Over the course of this parliament, the UK's media institutions will face a series of significant, overlapping and potentially existential challenges. In the same period the government will also be responsible for making major policy decisions that will shape the future of how British media is structured, funded, regulated and governed.
10. Public service broadcasting, news publishing, digital platforms and local media are not solely matters concerning thousands of UK businesses and hundreds of thousands of workers in the creative industries (as important and valuable as these are). These media institutions – and the policies that govern them – are essential to the cohesion of British society, to the creation and representative of British culture in all its diversity, and to informing the British public to take part in our democratic processes.
11. The Committee's contributions to these debates have the potential not only to influence the success of a major sector of the British economy over the next few years, but also to advocate for reforms that create a more independent, accountable and democratic media that benefits and empowers British audiences long into the future.
12. Over the course of this parliament, the UK's media institutions will face a series of significant, overlapping and potentially existential challenges stemming from long-term failures in policy, perverse incentives for producing harmful media content, and deeply embedded market distortions:
 - A handful of Big Tech companies dominate our shared online spaces without any accountability or public responsibilities. Meta and Google hold almost-total monopolies over digital advertising and content distribution algorithms, seriously undermining UK audiences' access to accurate, trustworthy and sustainable sources of public interest news.

¹ See mediareform.org.uk for the full archive of our reports and recommendations.

² Media Reform Coalition, [Who Owns The UK Media? 2023 Report](#).

- The industrialisation of mis- and dis-information by hostile states, hostile actors and unregulated media outlets is exacerbating crises of social division, political polarisation and extremism in British society.
- The collapse of the UK's local media – driven by the cuts and consolidation by a handful of large publishing companies – has left millions of people without journalism that is made in and about their communities.
- The UK's public service broadcasters have been weakened by decades of funding cuts, deregulation and political interference, and are ill-equipped to compete with the rise of the likes of Netflix, Amazon and Apple TV. The BBC and Channel 4 have become over-commercialised and risk-averse in their content strategies, and are increasingly disconnected from the public they are supposed to serve.

13. **These problems in our media are not unfortunate accidents; they are the direct result of decades of ineffective and failed public policies that have consistently put the private gain of dominant media providers over the public good.** Successive governments have ignored the widespread abuses of power, concentrations of media influence and diminishing public benefits that characterise the UK's major media institutions. Ofcom prioritises the freedom of media corporations to dominate the market and renege on their public obligations over its statutory duty to protect the public interest. Public inquiries and investigations by both the respective Commons and Lords Committees regularly (and repeatedly) make recommendations for substantial and urgent reforms, yet these are ignored or overlooked by governments who out of political expediency rarely see media policy as a matter of public priority.

14. These failures in media policy have resulted in significant long-term public harms: the loss of plurality and opinion diversity in our news media; the catastrophic underfunding of the BBC's services and the significant decline in provision of valued public service genres; the unabated growth of local news 'deserts' leaving hundreds of UK towns and cities without reliable, trusted local journalism; the loss of investment in unique, innovative content and programmes representing and celebrating the diversity of the UK's nations and regions; and the saturation of the online media landscape with disinformation, extremist and harmful content, exacerbating distrust, political division and public disaffection with no public accountability or public interest regulations to benefit and protect British audiences in the online world. All of these harms, and the policy failures underlying them, make the Committee's role and focus over the course of this parliament vitally important.

Themes and priorities for the Committee's future work

15. **Embedding public participation in BBC Royal Charter review** – The government is required to renew the BBC's Royal Charter by the end of 2027, but recent announcements make clear that DCMS has already begun initial work behind the scenes on scoping and preparing for its Charter review process. In a written statement the Culture Secretary said the coming Charter review will follow "a well-established, transparent process", but this description bears no relation to how previous Charter reviews have been conducted. During the last Charter review in 2015-16, DCMS openly ignored over

190,000 public responses to its consultation,³ and instead based its reforms on private negotiations, commercial lobbying and partial external reports. The government's Charter reforms detailed in its 2016 White Paper were decided through private unaccountable negotiations with commercial broadcasters and other stakeholders, and the results of public consultation did not have – nor were required to have – any measurable or formal impact on the government's Charter drafting.

16. In past Charter reviews the Commons Select Committee has provided important oversight and scrutiny. More so than any other official body engaged in Charter debates, the Committee's recommendations have balanced rigorous critique of the BBC's operations, challenging the government's proposals and recommending genuinely progressive BBC reforms for the public benefit. The 2015 'Future of the BBC' report called for parliament to have an increased formal role over Charter review, and lamented the extent of unilateral and unaccountable government control over the shape and content of the Royal Charter.⁴ In particular the Committee called for any final Charter deal to require approval by both Houses of Parliament before being assented at the Privy Council. Regrettably the government did not adopt this straightforwardly democratic change to Charter review, despite the Committee Chair who authored those recommendations becoming the Secretary of State in charge of the 2015-16 Charter review.
17. The BBC's future must contend with declining levels of trust in public institutions, the rising number of households cancelling their TV licences, and searching questions about the relevance and definition of the BBC's public service mission in a digital media landscape. But the BBC will only secure a sustained, popular and democratic future if the public has an active and direct role in setting its shape and purpose. The Commons Select Committee must use its role in the forthcoming Charter review to ensure the process is open, accountable and properly democratic, with the public and parliament given formal and direct roles in deciding the BBC's future. In addition to holding the government and the BBC to account on the democratic and participatory nature of their own Charter review processes, the Committee should adapt its own formal presence into a space for wider public deliberation and engagement with questions around the BBC Charter.
18. Alongside debates about the BBC's programmes and services, protecting and reforming the BBC's role as a universal, independent public service broadcaster also requires exploring structural changes to the BBC's governance and regulation. The Committee should avoid over-focusing on press reporting about particular BBC activities, government leaks and commercial lobbying proposals, and instead take a considered, comprehensive and evidence-led review of the transformative BBC reforms that are urgently needed (and which previous instances of the Committee have supported). These debates should include: abolishing the government's power over appointments to the BBC Board; establishing genuinely democratic models of BBC governance, such as mutualisation by making the public Members of the BBC, with guaranteed rights and powers over its operations; detailing the long-term impact on audiences of the 30% real-term cut in the BBC's public funding since 2010; refocussing Ofcom's regulation of the BBC's activities away from 'market impact' and towards ensuring the BBC serves audiences with universal public service content; and analysing the

³ Independent, '[Public overwhelmingly rejects plans to cut back BBC](#)', 1 March 2016.

⁴ HC CMSC (2015) [Future of the BBC: 4th report of session 2014-15](#), para. 343. HC 315

impact of commercialisation on how licence fee-funded content is monetised and distributed in the global market.

19. **The decline of the UK's local media** - Local media in the UK has collapsed after decades of corporate consolidation and takeovers, causing thousands of job cuts and the closure of hundreds of newspapers, radio stations and local TV networks. Approximately 4.7 million people – 7% of the population – live in news ‘deserts’, areas without a single dedicated local news outlet.⁵ The ‘hands off’ market-based model has completely failed to sustain a local media that is made for and made in our communities, and the small handful of large chain publishers who dominate the remains of the local news market have pivoted to online-only advertising funded models that replace community-based public interest journalism with clickbait.
20. The government is due to publish terms of references for its ‘Local media strategy’, according to the Culture Secretary’s remarks to the Committee in December 2024.⁶ As with BBC Charter review, this should be an opportunity for an open public debate about the public’s needs, interests and priorities for how they use and engage with local media in their communities. In addition to addressing on-going concerns about declines in revenue, how to support local journalism, and threats from AI and other digital technologies that have disrupted traditional news models, the Committee should speak to new independent local news outlets that have championed alternative models of local news. The Committee should also explore new mechanisms to empower community buy-outs of local media. Financial and regulatory supports would help communities preserve titles at risk of closure or corporate consolidation, while new legal structures for recognising local public interest outlets, similar to charitable status, would provide valuable tax benefits.
21. The Committee should also look beyond the dominant focus on local media policy as purely a domain for news and ‘traditional’ publishers. The UK’s local TV and community radio models have been successively deregulated, underfunded and abandoned by the commercial providers who committed to their founding public service obligations. This has led to a significant decline in the provision of community-made arts, music and local talk programming, in addition to the continuing surrender of local TV licences by the small handful of commercial operators. The local TV and community radio regulatory models and incentives need to be reviewed and radically reformed to preserve public purpose community media.
22. **Implementation of the Media Act 2024 and the future of the UK’s public service broadcasting ecology** - The Media Act 2024, passed just before the general election, updated many of Ofcom’s regulatory responsibilities to account for widespread changes in the broadcasting landscape. However, the Act also significantly narrowed the legislative definition of public service broadcasting (PSB), and abolished Channel 4’s ‘publisher-broadcaster’ status – enabling the publicly-owned company to make in-house content for the first time in its history. Ofcom’s implementation of the changes in the Media Act will require constant scrutiny to protect audience interests and the sustainability of public service content.

⁵ Public Interest News Foundation, ‘[Deserts, Oases and Drylands](#)’, July 2023.

⁶ [Oral evidence HC 330 Q58](#).

23. The Commons Select Committee needs to closely hold Ofcom to account in monitoring the falling provision of vital public service programming, which is likely to worsen following the removal of specific named genres from the legislative conditions that define Ofcom's oversight of PSB. Commercial PSB investment in children's content has fallen by 95% since 2003, when children's programming quotas were removed.⁷ The Media Act 2024 has now removed the requirements on ITV, Channel 4 and Channel 5 to provide programming in education, arts, science and religion. If the same decline is allowed to happen across these additional genres, audiences will lose access to even more socially and culturally significant UK-made content.
24. The Media Act's changes to Channel 4's production model also pose a serious risk to the sustainability of the UK's independent production sector, especially smaller indie companies. If Channel 4 starts making its own programmes following the Media Act reforms, smaller producers face a significant loss in commissioning opportunities. The share of Channel 4's commissioning spend going to 'indies' with turnovers £25m or lower fell to just 22% in 2022 – despite these companies making up 52% of the UK sector.⁸ The Committee will need to monitor any changes Channel 4 makes to its commissioning strategy, and consider exploring and recommending further regulations – such as an 'SME Guarantee' quota – to preserve Channel 4's founding mission as an investor in and creative engine for SME production companies.
25. **Tackling the UK's crisis in falling plurality and diversity of opinion in news media** – The UK is facing a severe crisis in concentrated media ownership. Just three companies – DMG Media, News UK and Reach – control 90% of national newspaper circulation, and these same publishers account for more than two-fifths of the online reach of the UK's top 50 news websites.⁹ Ofcom's light-touch approach has allowed control of our media to fall into fewer and fewer hands, with dangerous consequences for news plurality, viewpoint diversity and political representation.
26. Recent media merger situations, such as the RedbirdIMI/Telegraph buyout and the sale of The Observer, have further exposed the limits and harms of a regulatory model that allows for unaccountable transfers of power and influence in our media without any recourse to the public interest. In the case of the Telegraph Media Group acquisition by a UAE-backed consortium, parliament acted admirably quickly to close the legal loophole that allowed for dangerous and undemocratic political influence over our news media. However, there was little attention paid during these debates about the already existing levels of dangerous and undemocratic political influence that the dominant publishing companies – owned predominantly by overseas billionaires – have over our national conversation.
27. The Commons Select Committee should explore how the UK's media plurality regime can be updated to better protect diversity of opinion, freedom of journalistic expression and independence from concentrated ownership – as has been recommended by the Leveson Inquiry, the 2013 DCMS consultation on media plurality, the 2014 Lords Communications Committee inquiry, and many civil

⁷ MRC analysis of PSB spend on children's content 2004-2018.

⁸ MRC analysis of Channel 4 commissioning spend, via annual reports/Pact figures.

⁹ Media Reform Coalition, ['Who Owns the UK Media?' 2023 report](#).

society organisations.¹⁰ This should include investigating the introduction of clear legislative thresholds on market/ownership shares for triggering regulatory intervention - the Enterprise Act 2002 allows government to intervene in media mergers on public interest grounds, but not in response to consolidations in media markets that occur dynamically outside of merger situations.

28. The Committee should also explore how giving Ofcom power to impose public interest obligations on media organisations with significant market shares could help to remedy the current imbalances in share of voice and reach. A mechanism for requiring e.g. investment in public interest journalism, transition to pluralistic ownership structures and divestment of assets would allow for a progressive scale of remedies to mitigate the negative impacts of concentrated ownership across news, tech platforms and other media markets.
29. Ofcom's statutory duty to monitor media plurality needs to be modernised and strengthened to accurately assess the impact of online intermediaries like Facebook, Google and X. Ofcom's recent consultations on media plurality, local news and online intermediaries have all identified difficulties and changes in our understanding of media ownership, while simultaneously identifying that the dominant online platforms have a controlling effect on how British audiences can find, access and engage with news content. The current criteria used to assess news consumption do not account for the pivotal role of tech platforms, in particular how these can amplify the reach and market share of dominant 'traditional' news outlets, and thus worsen cross-market media concentration. The Committee should question Ofcom on how it intends to apply its statutory plurality duties in this landscape, as well as research and advise on how the plurality measurement framework should be updated.
30. **The urgent need to regulate Big Tech for public good** - The online platforms and new digital technologies at the centre of our modern lives operate by opaque algorithms, unaccountable technological biases and an unrestrained commercialisation of user data. These have all helped to amplify disinformation, political polarisation and collapse revenues for 'traditional' media. Regulating the global Big Tech companies that control these platforms is essential to ensure they work in the public interest.
31. The Commons Select Committee will need to play a close role in researching and scrutinising a range of different potential public interventions and regulatory changes to ensure that the impacts of Big Tech do not result in wider harms to the British public and media users on online platforms. Tech companies with dominant market shares in advertising, online search and social media make exorbitant profits from re-publishing and hosting UK news content, but very little of that value is returned to either the outlets or journalists that create this news, or the British public who have no control over what kind of news they can encounter online and how to access it. The Committee should explore the potential use of levies on tech companies' revenues, in addition to public service obligations, to recoup some of this transferred value to invest in public interest journalism made in and about the UK.

¹⁰ [DCMS Media Ownership & Plurality Report](#); House of Lords Communications Committee – [Media Plurality report](#).

32. The newly established Digital Markets Unit within the Competition and Markets Authority now has legislative power to impose and enforce corrective remedies on any tech companies designated by the CMA as having 'strategic market status', under the Digital Markets, Competition and Consumers Act 2024. The CMA is currently engaging in an SMS designation process of Google's general search services, and the Committee should look to play an active and on-going role in exploring how the implementation of this new legislative power can be used to benefit British audiences and the sustainability of UK public interest journalism. In particular the Committee should ensure that the interests of small and independent publishers are properly reflected in any deals or frameworks introduced on any designated SMS platforms. Small and independent publishers will need to be able to trade with large tech companies on fair, reasonable and non-discriminatory terms to guarantee that these outlets are not sidelined. The Committee should also closely monitor any financial or behavioural remedies so that any recompense for publishers reflects the significant monetary and service value of UK local and independent news to platforms' users.¹¹

Changes in how the Committee conducts its inquiries into media policy

33. How the Committee conducts its media inquiries is just as important to the effectiveness of its work as the topics and policies the Committee chooses to investigate. **Firstly, the Committee needs to ensure that it speaks to and for the public in its investigations, and holds the government to account for (not) properly including the British public in its media policy decisions.** Despite media being fundamental to the public's rights and interests, media policymaking in the UK is defined by a dangerous and undemocratic lack of public participation. This is most evident in debates about public service broadcasting, a policy intervention which is ostensibly made in the public's benefit but has rarely (if ever) been shaped by direct and active participation of the public in policy decision-making. The last BBC Charter review, for example, received 192,000 public responses to the DCMS Green Paper consultation – but these responses were openly dismissed and ignored by the then-Secretary of State.

34. **Second, the Committee needs to broaden the range of groups and interests it consults on media policy by engaging more openly and regularly with independent media outlets and civil society groups, rather than focusing on the largest media companies and established sector grantees.** The recent Lords Communications Committee inquiry into 'The future of news' examined a range of challenges and considerations at the heart of addressing the sustainability of high quality news and journalism in the UK – yet the Committee spoke almost exclusively to politicians, regulators, executives at large news publishers and a handful of academic institutions. Out of the 52 people invited to give testimony to inquiry sessions, only one represented an independent local media outlet.¹² If the Commons Select Committee seeks to properly understand the challenges and opportunities in the UK's media sectors, it will need to speak to smaller and independent media outlets, who are succeeding on the basis of alternative ownership structures, exercising different models of 'doing journalism', and funding and creating media content in innovative ways that engage with marginalised and under-served audiences in ways that larger established media businesses are not. A closer and more open engagement with civil society groups will also ensure the Committee is

¹¹ See [Joint statement on 'Principles for fair competition'](#), July 2023.

¹² House of Lords Communications Committee (2024) [Future of News inquiry](#).

informed by perspectives from distinct communities, campaign movements and public constituencies who interact with the UK's various media sectors.

35. **Third, the Committee should strive to undertake and interrogate *qualitative* analysis of the impact of UK media – both positive and negative – and not limit its understanding to quantitative reports, or assuming taken-for-granted ideals are being fulfilled.** The public's relationship with media is about more than hours of content consumed or surveyed scores of trustworthiness or brand recognition. In addition to the 'standard' quantitative methods, the Committee should explore including qualitative methods in its inquiries that focus on identifying, assessing and critiquing the contribution of media institutions to social cohesion, cultural self-expression, democratic participation and individual connection with different communities. This kind of interrogation will require sustained and active engagement with the public, such as the Citizens' Assembly or Citizens' Jury models used by (among others) Ofcom as part of its 2018 *Small Screen, Big Debate* review of public service media.¹³
36. **Finally, the Committee must recognise across all of its work that the challenges facing the UK's media sectors can no longer be addressed in isolation from one another.** The growing dominance of a handful of Big Tech platforms and global streaming services on how media content is funded, distributed and created – alongside the generational shifts in media technologies and audience habits – has meant that the crises in local news, public broadcasting, media concentration and media accountability require a combined approach to reforming and strengthening the UK's media policies for the benefit of the public.
37. In addition to the policy areas the Committee should explore during the current parliament, we also recommend that the Committee explore the mechanisms and terms of reference for establishing a comprehensive **Public Commission on Media and Democracy**.¹⁴ For too long governments have taken an inconsistent and intermittent interest in media policy, acting only when there is a perception of political opportunity or (more frequently) to tackle harms and abuses of powerful media interests. A public commission would create the space for understanding the many systemic failures of in our media system, identifying the mistakes in politics and policies that enabled them, and developing a more democratic relationship between media and the public.
38. The Commons Select Committee could lead on establishing and hosting the commission, by sourcing original research, expert testimony and extensive public engagement. Its core areas of inquiry could examine a wide range of topics relating to the media, from intricate questions of regulation and policy intervention to deeper considerations about the media's role in facilitating cultural self-expression, social cohesion and democratic citizenship. The UK has a long history of reviews and inquiries into broadcasting and the press: with the rapid changes across our modern, digital media system, and the ineffectiveness of many recent policy interventions to adapt to these changes, an in-depth, detailed Public Commission on the future of our media is needed now more than ever.

¹³ Edwards, L. and Moss, G. (2020) [Debating the future of Public Service Broadcasting: Recommendations of an Online Citizens' Assembly](#).

¹⁴ See Media Reform Coalition, [Media Manifesto 2024](#).