

**The Media Reform Coalition is deeply concerned by the DCMS Green Paper, its proposals for BBC reform and the Government's rushed Charter review process.**

1. The DCMS consultation on Charter renewal is needlessly rushed, limited in scope and excludes the British public from having a democratic role in deciding the BBC's future.
2. The proposed changes to BBC governance will not enhance its independence or restore public trust. The next BBC Charter must establish democratic public & parliamentary accountability.
3. Introducing advertising, subscription or paywalls on any BBC services will fatally undermine the BBC's mission to serve the needs and interests of all the UK equally.

### The Charter Review public consultation

- **The future of the BBC depends on its democratic legitimacy.** A rushed consultation will undermine the quality of reforms and isolate the BBC from the British public who own and fund it.
- **DCMS must extend the consultation period and organise Citizens' Assemblies** to give the public an active and direct role in shaping the BBC's next Royal Charter.

The DCMS public consultation allows just 12 weeks for the public to give their views on the BBC's future - a timeframe already reduced by the Christmas and New Year holiday breaks.

The online questionnaire comprises closed questions with simplistic agree/disagree options. Some questions are poorly designed, require expert knowledge of BBC policy and are unlikely to produce meaningful detail on the public's views.

The Government's terms of reference suggest this will be the only opportunity for public participation in BBC Charter renewal. This risks repeating the undemocratic practices of the 2015-16 Charter Review, when reforms were developed through opaque or fully private stakeholder engagement, while 192,000 public submissions were ignored.

### Governance, accountability & political appointments

- **All Government appointments to the BBC Board should be abolished and replaced with an independent appointments process.** The Green Paper's proposals to retain government control over appointing (at least) the Chair of the BBC would leave in place a dangerous and unacceptable mechanism for antidemocratic political influence over the BBC.
- **The next BBC Royal Charter must establish democratic public participation in how the BBC is run, providing for genuine public accountability and transparency.** Public panels shaping the BBC's governance, editorial and commissioning processes will enhance the BBC's connection with its audiences.

There is an urgent need to systematically reform the BBC's governance and enhance its accountability to the public.

Government appointees face persistent allegations of interfering in BBC decision-making. Licence fee payers and Parliament have no means to hold the BBC to account for failures, and the unitary Board structure has failed to safeguard the BBC's independence.

Just 43% of 872,000 respondents to a recent BBC survey believe the BBC is effective at being independent from government. Despite this, the Green Paper offers only piecemeal reforms to BBC governance which will do little to protect it from interference or restore public trust in the BBC.

## Advertising, subscription & paywalls

- **Introducing advertising, subscription or paywalls on the BBC's UK services will wreck the BBC's democratic connection with audiences as citizens**, and take even more investment away from UK-made content that informs, educates and entertains.
- Forcing the BBC into the UK ad market would **significantly drive down prices, reducing revenues not just for the BBC but for ITV, Channel 4 and the wider commercial broadcasting sector too**. Relying on advertising revenues would create an est. £1.2bn BBC funding shortfall (Ampere Analysis, 2022), inevitably leading to further cuts in core BBC services.
- **Introducing paywalls or subscription would create a 'two-tier' BBC**, in which poorer households are locked out of accessing previously free-to-air content - such as major national sporting events or on-demand access to popular series.

Since 2010, below-inflation freezes to the TV licence fee have cut the BBC's public income by 40%. This has made the BBC increasingly reliant on commercial revenues - 35% of its total income in 2024/25 – of which just 5% (£120m of £2.2bn) is reinvested in public service output.

The TV advertising market is in terminal decline, and increasing the BBC's dependence on commercial income would fail to supplement (let alone replace) the funds it needs to provide a universal public service.

Requiring the BBC to produce more commercially-appealing content will compromise the BBC's investment in genres that the market doesn't provide (such as children's programming, news and regional content) and limit the social and cultural benefits of the BBC.

## Reforming the TV licence fee

- **Tweaking with the TV licence fee is not enough – the BBC's public funding must be replaced with a modern, fairer and progressive model**, which reflects households' ability to pay while enshrining the BBC's mission to serve all audiences.
- **The Government has not provided any justification for ruling out alternative funding models**. Its rationale for reforming TVLF collection and enforcement seems intended to enable a further reduction in the BBC's public income, rather than securing sustainable and guaranteed funding.

The TV licence fee is outdated, regressive and unfair. It gives the Government unaccountable power to pressure the BBC through control of its funding, and does not reflect the realities of the modern media landscape. This undermines the public's ownership of and stake in what the BBC provides.

The Government's proposed licence fee reforms fail to grasp its failures as a funding model and its ineffectiveness for supporting the BBC as a universal public service. They will not enhance the fairness or proportionality of the licence fee, nor help to restore the BBC's public income after 15 years of cuts, freezes and political attacks.

## The BBC's Public Purposes

- The Government has provided **no evidence to show how a new Public Purpose "focused on driving economic growth" will improve the BBC's substantial economic contribution to the UK**.
- The next BBC Royal Charter should include new Public Purposes that: (a) embed the BBC as an **open and collaborative anchor for the UK's local media**; (b) give the BBC a responsibility to **enhance public media literacy**; and (c) restore the BBC's obligations to **expand the public benefits of new technologies** and to **make international content widely available to UK audiences**.

Charter Review is a vital opportunity to expand the BBC's role as a vital and valued public institution. Any new Public Purposes should reflect this, but the Green Paper's suggested additions are vague and unlikely to enhance the BBC's benefits to the UK public.