

# Media Reform Coalition: Response to the DCMS Green Paper consultation on BBC Charter Review

*Submitted 10 March 2026*

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## Introduction

Since 2011, the **Media Reform Coalition** has been at the forefront of the UK's media reform movement. We work with media experts, civil society groups, campaign organisations and media workers to produce original evidence and proposals for building a more independent, accountable and democratic media. In recent years the future of the BBC and the broader public service media (PSM) system in the UK has become central to much of our research, analysis and advocacy.

This is the Media Reform Coalition's formal response to the BBC Charter Review consultation. Although our response follows the question structure of the DCMS consultation survey, we have prepared this submission to provide a full account of our analysis, evidence and recommendations for the Government's topics of interest and BBC reform more widely.

From the outset, we wish to register our deep disappointment with the format of the online survey. We consider it wholly inadequate for the complexity of the topics being addressed, and does not facilitate additional input or qualitative responses on critically important matters for this once-in-a-generation debate on the BBC's future. The survey's value as an evidence-gathering exercise is weakened by leading questions, limited response options, topics that do not address the contents of the Green Paper, and tick-box answers that require acceding to vague implications or assumptions about possible policy change.

We further note that if the government genuinely wishes to have more engagement from the public with fundamental questions about the BBC, its legitimacy and its future, a consultation such as this is a poor starting point. While the formal consultation is closed, we urge the government to develop additional tools for engaging the public, extend the period for producing the White Paper, and systematically seek additional public information via town hall meetings across the nations and regions. We earnestly request that DCMS treat this consultation as the beginning of public participation in BBC Charter Review, and not the end.

## The Media Reform Coalition's proposals for BBC reform

- **Opposing the introduction of advertising and subscription pay-walls** on any BBC public services in any form; these would destroy the BBC's essential mission to provide universal public media serving the needs and interests of all.
- **Removing all unaccountable government control** over BBC Board appointments, funding decisions and the Charter Review process.
- **Democratising the BBC** by transforming it into a mutual organisation, owned and run by its members with active and direct public and workforce participation in BBC governance and decision-making.
- **Replacing the outdated, unfair and failed TV licence fee** with a universal household levy, collected through council tax with progressive exemptions and discounts, with the charge determined by an independent process and rated.
- **Reversing the commercialisation of the BBC's regulation and production**, by requiring Ofcom's assessment of any BBC service changes to prioritise preventing harm to audiences over preserving the commercial interests of the BBC's competitors.
- **Opposing the use of Charter renewal as a tool for government interference**, for example by imposing a political priority for 'growth' onto the BBC's Public Purposes.
- **New Public Purposes requiring the BBC to promote media literacy and become an 'anchor institution' for local media**, providing open community access to its resources.
- **Restoring the BBC's previous Public Purposes** for technological innovation and providing UK audiences with a breadth of international content.

**Question 1. Do you agree or disagree that the BBC's current Mission and Public Purposes should remain the same?**

MRC response: **Disagree – The BBC's Mission and Public Purposes should change**

The pre-2017 Public Purposes required the BBC to lead on public purpose innovation and providing UK audiences with international content, should be re-introduced. The BBC has led the industry in technological innovation<sup>1</sup>; reintroducing the Public Purpose would ensure this investment should include a requirement to directly serve the public interest. The BBC is also a unique source of international news and information for the UK public, but its provision is lacking in this area.<sup>2</sup> Yet this is essential in the context of a world where the UK's actions are increasingly determined by geopolitical tensions, and to situate those tensions in the context of the international histories, cultures and societies of different countries, including the UK's own colonial history.

A renewed Public Purpose for 'bringing the world to the UK' would ensure international content remains a high priority. A new Public Purpose to promote media literacy by working collaboratively to support the existing sector and the public as active, informed and engaged citizens is needed (see below). Similarly, a Public Purpose for the BBC to act as an 'anchor institution' for restoring and expanding the UK's local media, which are facing existential threats,<sup>3</sup> is urgently needed. It should require collaboration with independent local news providers and civic organisations to ensure its local resources are available for community participation.

**Question 2. To what extent do you agree or disagree that the BBC should have a specific Public Purpose to support economic growth?**

MRC response: **Strongly disagree – A Public Purpose aiming to support the growth of the creative economy should definitely not be added.**

The case has not been made to make economic growth an explicit public purpose. The BBC is already a major (if not the most significant) economic contributor to the UK's broadcasting, arts, culture and creative sectors. As the Green Paper's own analysis demonstrates, the BBC's public investment already creates significant economic growth, industrial infrastructure and talent development for independent producers, media workers and businesses across the UK. Adding this role as a Public Purpose risks encouraging the BBC to engage in activities that are geared towards serving consumers and businesses, rather than keeping to its foundational mission as a public service media institution serving

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<sup>1</sup> Klontzas, Michael. "Public Service, Technology and Innovation." In *Media Pasts and Futures: Critical Reflections on "Power Without Responsibility,"* edited by Des Freedman and Michael Klontzas, 134–38. University of Westminster Press, 2025. <http://www.jstor.org/stable/10.16997/book74.24>.

<sup>2</sup> Cushion, S. et al (2019). *The range and depth of BBC News and current affairs: A content analysis summary report* London: Ofcom. <https://www.ofcom.org.uk/siteassets/resources/documents/tv-radio-and-on-demand/bbc/bbc-news-review/research-documents/bbc-news-review-content-analysis-summary-report.pdf?v=324316>

<sup>3</sup> Firmstone, J. & Whittington, R. (2021) *Local political journalism: Systematic pressures on the normative functions of local news*. In J. Morrison, et al. (eds). *The Routledge companion to political journalism*. London: Routledge.

audiences and citizens. Moreover, its contribution to growth is the outcome of public investment, and provides a strong argument for the Government to ensure this public investment is sustainable by reforming the licence fee and being more transparent about what that contribution delivers for wider society.

**Question 3. Which option, if any, most closely represents your feelings on whether the BBC should continue to provide a wide range of content and services that represent all audiences in a way that brings communities together, supports social cohesion, and helps build a unifying national story throughout the next Charter period?**

**MRC response: The BBC should do more to represent all audiences. The BBC should provide more content and services aiming to represent all audiences.**

The BBC's own 'Our BBC, Our Future' survey identifies that more needs to be done to include and represent all audiences in its content. Research has shown that this inclusion and representation needs to be based on depth rather than breadth, going beyond on-screen inclusion and underpinned by a commitment to sharing decision-making power.<sup>4</sup> Representation alone is not enough, although representation itself should be grounded in a robust understanding of the value and potential outcomes of representation, not simply a tick-box exercise based on percentages or numbers.<sup>5</sup> Representation has been shown to have a positive effect on social cohesion, and is a vital component of the service the BBC delivers, so must be prioritised.<sup>6</sup> We support the BBC's focus on arguing for an outcomes, rather than outputs, focus on this and other measures of its performance.

**Question 4. If you agree that the BBC should continue or do more to play this role, what options aiming to improve how the BBC reflects and represents all audiences do you support, if any?**

MRC response:

- **Producing more content that is distinctive to the UK**
- **Covering genres which are less covered by other broadcasters e.g. arts, minority language broadcasting**
- **Producing more content that brings people together around shared moments**
- **Sharing diverse voices and perspectives from all parts of the UK**
- **Improving on and off screen diversity**

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<sup>4</sup> Moss, G. & Edwards, L. (2020) Debating the future of public service broadcasting: Results of an online citizens' assembly. London: Ofcom

<sup>5</sup> Naerland, T. & Dahl, J. (2022). Beyond representation: Public service media, minority audiences and the promotion of capabilities through entertainment. *Poetics*, 92, Part B.

<sup>6</sup> Graván, M. (2022). Representation and Recognition: The Perceptions of Finnish and Spanish Viewers of Their Media Ecosystems and Public Service Newscasts. *International Journal of Communication*, 16 (2022), 4501–4522

Measuring success or fulfilment of ‘universality’ does not need to be, nor can it be done effectively through, solely quantitative interventions such as quotas in the framework/operating agreement.

**Question 5. To what extent do you agree or disagree that new requirements on the BBC should be introduced so that the BBC does more to improve workplace standards?**

**MRC response: Agree – New requirements on the BBC to improve workplace standards should probably be introduced.**

**Question 6. How, if at all, does the amount those working for the BBC are paid impact your view of the BBC? When responding, you may wish to consider how much it impacts your trust in the BBC’s outputs and whether it affects how much you engage with BBC services.**

**MRC response (for questions 5 and 6):** All institutions should strive for the highest workplace standards. However, workplace conditions are a matter for trade unions and the BBC to collaborate on, in line with national legislation, and in light of the leadership role the BBC plays in the sector. It is not a matter for Charter. BBC pay is too often politicised as a stick with which to beat the BBC. The key question is to ensure workplace standards are set in conjunction with the unions that represent BBC staff. An imposed set of conditions may result in tick-box approaches; what is needed is integration of unions into discussions about pay and conditions, so that they are set in light of the BBC's constraints as a public service institution and the need to respect the rights and fair working conditions of everyone working at the BBC.

We endorse Equity’s call for the recognition of trade unions as essential partners of the BBC in guaranteeing good jobs across the UK, along with rights and dignity at work for employees and freelancers. Improving workplace standards must not be seen solely as a matter for managerial tinkering and ‘initiative’ from the top of the BBC hierarchy. It must mean a radical change in the relationship between BBC workers – the heart of everything the BBC makes and does – and the BBC’s institutional leadership.

**Question 7. To what extent do you agree or disagree that the BBC is currently accountable to the public?**

**MRC response: Strongly disagree – The BBC is almost never accountable to the public.**

**Question 8. Which of the following options aiming to enhance the BBC’s accountability, if any, do you support?**

**MRC response:**

- **Requiring the BBC to use consultative forums, such as citizens’ assemblies, so that decision-making represents the public’s views and voices**

- **Requiring the BBC to hear regional perspectives through new consultative frameworks or other structures, representing each of the UK's nations and/or regions**
- **Enhancing how the BBC conducts audience research to help inform decision making**
- **Strengthening requirements of the Board to ensure the BBC engages with the public in a meaningful way**
- **Changing the structure of the Board to enhance its effectiveness and accountability**
- **Changing the Board's appointment process, this could include reducing the government's role in board appointments to appointing the Chair only**
- **Clarifying the roles and responsibilities of board members, this could include setting out duties for the Chair**
- **Enhancing the role of the independent board members and their ability to hold the BBC to account**
- **Strengthening the external scrutiny of the BBC, this could include, for example, greater oversight by Ofcom or Parliament**

The BBC is accountable to Ofcom, and only irregularly scrutinised by parliament. Scrutiny and evaluation by these bodies is not the same as public accountability. A fundamental shift in the relationship between the BBC and the public is needed, grounded in democratic engagement such as citizens' assemblies. We have proposed reform in our 2022 [Manifesto for a People's BBC](#), which provides an evidence-based argument for why and how a more accountable, democratically governed BBC might be run. The 2025 [Mutualisation](#) proposal also provides robust evidence and argument for a co-operative model for BBC governance. Public accountability has to be structural, embedded in BBC systems and processes, rather than an add-on afterthought – and crucially it must flow directly through the public, and not 'upwards and outwards' via other institutions which themselves lack direct engagement with the needs and interest of the public as citizens.

**Question 9. The government is considering targeted changes to increase transparency in the BBC to enhance BBC accountability over the next Charter period. Which options, if any, do you support?**

MRC response:

- **Improving the way the BBC communicates important information so it is clear, concise and able to be understood by everyone**
- **Requiring the BBC to communicate important information better to industry stakeholders, particularly to other UK broadcasters**
- **Requiring the BBC to communicate more information about its complaints process, particularly to those who submit complaints**
- **Requiring the BBC to communicate more information about the process for selecting which programmes should be made and broadcast**
- **Requiring the BBC to communicate more information about its editorial decisions**

Transparency can be used to obfuscate as well as clarify, particularly by organisations<sup>7</sup>. Communicating information that publics say they need and value must be the starting point, and transparency should be connected with a requirement for public dialogue about particularly contentious issues. Transparency should be used to serve public trust, not just a tick box exercise. It must be connected to areas where the public already say they do not know enough about the BBC, or want more involvement (e.g. in commissioning, production decisions, at the local level). Transparency also needs to be tailored to local audiences so that the BBC justifies locally-impactful decisions (e.g about how it will support local news, or changes to its local services). It cannot always be a one-size-fits-all institutional exercise, but must ensure the information provided is accessible and grounded in a dialogue with the public and an understanding of their needs.

**Question 10. Why, if at all, does the BBC's independence matter to you?**

MRC response:

- **It allows the BBC to be free from government or political influence in the content it releases**
- **It allows the BBC to be impartial when reporting on elections, government policies, and political parties**
- **It allows the BBC to hold government to account and/or be critical of government**
- **It allows the BBC to be editorially independent and make the final call on what stories to cover and how to cover them**
- **It allows the BBC to pursue its own agenda, without interference, so it can provide content that serves audiences across the UK**

Independence is essential for public trust; the options above fail to recognise this, they only situate it in relation to what it allows the BBC to do. The public currently see the BBC as connected to elites, and independence is the area where the BBC survey suggest they are performing least well compared to expectations. Ongoing scandals have revealed that political influence within the BBC is a significant issue and has resulted in some toxic outcomes that threaten the BBC's legitimacy. This is a mission-critical issue. Independence must be structurally protected and clearly evidenced in decision-making and management / executive functions. It must also be grounded in a reset of BBC governance that is more democratic and involves the public in consequential governance decisions.

**Question 11. What measures to increase the BBC's independence from government, if any, should be prioritised to support greater trust in, and engagement with, the BBC?**

There have been multiple suggestions on this, all backed up by evidence. These include mutualisation to deliver a co-operative governance structure (which the Secretary of State has supported); citizens' assemblies (widely supported among experts as a stand-alone

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<sup>7</sup> Edwards, L. (2020). Transparency, Publicity, Democracy, and Markets: Inhabiting Tensions Through Hybridity. *American Behavioural Scientist*, 64(11): 1545-1564.

measure or integrated into other forms of governance); a public media commission; a public lock for mission-critical or existential decisions; more devolved governance to integrate the nations and regions in governance more effectively. We point the government to the MRC's collaborative [Alternative Green Paper](#), which includes many of these suggestions, and to other key contributors to this consultation (e.g. VLV, Demos). Urgent requirements include full and complete independence of the Board and Executive, with appointments free from political influence; An independent body to set the licence fee; a permanent charter that is subject to regular evaluation (but not removal), including by the public; Public involvement in the appointment of senior executives to increase legitimacy and trust.

**Question 12. What, if anything, should the BBC focus on to ensure AI is used for the public good, and for the benefit of the wider creative industries?**

Any obligations around AI would be incorporated into a new public purpose about innovating as a public service and to deliver to the public good. Detail of this PP would include informing the public of what it is doing in innovation. The options in this question allude to policy priorities rather than the core mission of the BBC to inform, educate and entertain. They also address media literacy (which is raised elsewhere in this survey) and to ethics of AI, which would be incorporated into innovation for the public good / as a public service. Obligations for AI specifically are likely to be outdated very quickly and we would not support their introduction.

None of the options offered in this question reflect benefit for the public or for the BBC, and seem tailor-made to push the BBC towards becoming a subordinate partner for AI companies. Again this indicates an intent by the Government to impose its current policy objectives in relation to AI onto the UK's independent national public broadcaster. The suggestion in the Green Paper that BBC Archive content might be made available for 'training' AI models – i.e. scraping British creativity to produce barren copies with no recompense to its original producers or audiences that funded it – is especially repugnant, and reflects poorly on the Government's balance of priorities at Charter Review.

**Question 13. What kind of programming, if any, do you think the BBC should make more visible on its platforms?**

MRC response:

- **News and current affairs programming**
- **Arts, religious and international affairs programming (sometimes referred to as 'underserved' genres)**
- **Children's and educational programming**
- **Programming showing different voices and perspectives from across the UK**
- **Locally relevant programming**

Visibility depends on whether audiences know about the content – the priority should be making audiences aware of what content can be found where, and how they can access it. The universal range of the BBC's content is central to its public legitimacy. The wider legislative settlement relating to prominence of public media content on broadcast and digital

platforms should be reformed and expanded, to prioritise enhancing the reach of and broadening audiences' serendipitous exposure to BBC content across genres and formats – including those that are ubiquitous and underserved.

**Question 14. To what extent do you agree or disagree that the BBC should make greater use of third party platforms to share its content?**

MRC response: **Agree – The BBC should probably make greater use of third party platforms to share its content**

**Question 15. Reflecting on your response above, please explain why you agree or disagree that the BBC should make greater use of third party platforms to share its content. Please provide relevant evidence, where possible.**

Third party platforms are necessary to reach different audiences, and they facilitate broadening the range of formats and genres that the BBC can make available. However, this must not be done at the expense of the BBC's public service remit. Platforms have no guarantee of universality, act as content gatekeepers and are opaque in the way algorithms push content to viewers. They have no obligations to operate in ways that prioritise the public good, and these must be regulated for if they are to be achieved<sup>8</sup>. As recognised in research on other PSBs<sup>9</sup>, their commercial architectures raise important risks for the BBC, including in relation to excessive advertising and branding associations with BBC content (for which it may not receive the revenue). Using third parties must not make the BBC subject to excessive commercial charges for its content either; if this becomes more common, then platforms operating in the UK should have a requirement to carry, or make prominent, a certain amount of public service media content and should have in place measures to limit excessive filtering of public service content. Nor should the use of third party platforms ever limit the ongoing development of the BBC's owned, public service and non-commercial platforms. These must be protected to ensure universal access, inclusion and reach.

**Question 16. What, if anything, do you believe would improve the value and relevance of BBC news and current affairs to you? This includes all BBC news and current affairs content, including its TV, radio and online news services, and local, national and international news outputs.**

MRC response:

- **Robust and transparent editorial guidelines applied consistently**
- **Greater explanation of the editorial and journalistic decisions taken when reporting the news**
- **Greater transparency when mistakes and errors are made**

<sup>8</sup> Van Dijck, J., Poell, T., de Waal. M. (2018). *The platform society; Public values in a connected world*. New York: Oxford University Press.

<sup>9</sup> Olsen, R. Kr., Tenenboim, O., Hess, K., Westlund, O., Lindén, C. G., & Broersma, M. (2025). Platform paradoxes and public service media legitimacy: a cross-national study. *Information, Communication & Society*, 28(10), 1818–1835.

- **More effort to be made in taking into account the public's views in its news coverage**
- **Reporting more news stories which are local to you**
- **Reporting more international news stories**

The options for answering this question are focused on outputs rather than the quality of the relationship between the BBC and its audiences. It is crucial that the government shifts its thinking here to avoid repeating old mistakes. Value and relevance are tied to trust and legitimacy, and these in turn depend on (1) clearly demonstrating the BBC's independence from government and corporate influence (2) an independently set licence fee that is clearly explained and has legitimacy across the public (3) mechanisms for public accountability that involve the public in decision-making about programming, content, and editorial challenges. It is also crucial that a case is made for the role of the BBC in providing news and current affairs in the way it does, including how and why it might do things differently compared to other news outlets, in line with its public service remit. These measures would improve public understanding of the decisions and complex challenges that the BBC's news and current affairs division (and other divisions) face. They would remove political interest, replacing it with the public interest, at the heart of the BBC.

**Question 17. Thinking about the next Charter period, what role, if any, do you think the BBC should have in ensuring UK citizens can recognise and access trusted and accurate information?**

The investments in BBC Verify are positive and have been increasingly valuable in the current information environment. However, they remain housed in the BBC and the processes and practices of checking and affirming are not always clear. Tying this work into a new public purpose on media literacy would ensure these tools can be used in other contexts, by other organisations, to support the development of citizens' independent skills for recognising and critiquing information as well as using media creatively and proactively to participate in society<sup>10</sup>. The BBC's current work also needs to connect with the extensive media literacy sector<sup>11</sup> and the expertise of practitioners, so that it does not work in isolation and the impact of its work is maximised.

In addition, the value and relevance question above only addresses BBC output. There is no recognition of the need for dialogue with the public about choices made so that they are better understood and so that complex issues of accuracy and impartiality are fully debated – yet this is critical for enduring BBC content remains valued and relevant to the public. In addition, the importance of non-news programming needs to be recognised as an additional source of trusted and relevant content. As above, we point the government towards the [Alternative Green Paper](#) for more discussion of these issues, and support the BBC' desire for measures to focus on outcomes rather than outputs.

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<sup>10</sup> Bulger, M. & Davison, P. (2018). The promises, challenges, and futures of media literacy. *Journal of Media Literacy Education* 10(1): 1-21.

<sup>11</sup> Edwards, L., Obia, V., Goodman, E. & Spasenoska, S. (2023). Cross-sectoral challenges to media literacy: Final report. London: DSIT

Question 18. The BBC's international output showcases the UK, its culture and its values to a global audience. This includes the BBC World Service, which seeks to provide access to trusted news around the world in an increasingly challenging international environment. To what extent do you agree it is important that the BBC continues to perform these roles internationally?

MRC response: **Strongly agree – The BBC must continue to provide this role internationally.**

Question 19. What, if anything, do you value about the BBC being UK-wide?

MRC response:

- **Bringing people together from different communities across the UK, including its nations and regions**
- **Representing people from across the UK**
- **Telling local stories to a national audience**
- **Providing local news and information**
- **Money spent in local areas**
- **Stimulating local creative clusters (e.g. MediaCity in Greater Manchester, BBC's new headquarters in the West Midlands), including through supporting the independent production sector.**
- **Jobs and skills development for local people**

Most fundamentally, the BBC provides a universal service that no other non-PSM provides or guarantees. It also provides regionally-tailored content within its service, so that the regions and nations are served – commercial broadcasters would not provide this service to the same level. More generally, the BBC's role as a social and infrastructure is a vital element in making communities visible to each other and creating the foundation for social and cultural cohesion across the country, as well as to enable people to connect across difference<sup>12</sup>. The options above do not recognise this more educational / connecting role of the BBC, they situate representation as a personal benefit. It is also crucial to universal access and nationwide reach are also essential to its mission as a public service broadcaster, as well as providing the basis for a universal licence fee.

Question 20(1) To what extent do you agree or disagree that the BBC should be required to spread more of its spending, activities, and decision-making across nations and regions of the UK?

MRC response: **Agree – The BBC should probably do more to spread its spending, activities and decision making across nations and regions of the UK.**

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<sup>12</sup> Frischmann, B. M. (2017). *Understanding the Role of the BBC as a Provider of Public Infrastructure*. Cardozo Legal Studies Research Paper No. 507, Available at: <http://dx.doi.org/10.2139/ssrn.2897777>

A greater spread of BBC spending in the nations and regions must be paired with empowering audiences within those communities to direct how the BBC commissions, produces and sources content. This is an essential step not just in enhancing the public's relationship with the BBC, and the BBC's accountability to audiences, but also in ensuring that the widest possible range of creative perspectives are included in how the BBC fulfils its obligation to serve the needs and interests of all audiences, and to reflect and represent their identities and communities.

**Question 20(2) Which option(s), if any, would you support for spreading the BBC's economic impact and role supporting the production sector across the UK nations and regions?**

MRC response:

- **Requiring the BBC to develop long-term strategies for regional creative sector development**
- **Further quotas or obligations for producing content outside London and the M25**
- **New quota targets for basing staff involved in commissioning content across the UK nations and regions**
- **Governance changes to give regional or local leads for commissioning content more control over their budget and decision-making**
- **Changing the rules so location is factored into decision-making around commissioning content from independent production companies**

Quotas may not be the best option, but the BBC's spend on production is still dominated by London and the South East, and access to the media, the creative industries, and the BBC in particular is still highly unequal, partly because of the expectation that people will move to this extremely expensive region of the UK to further their careers<sup>13</sup>. Given the benefits to local economies of the BBC's investment outside this area, more must still be done. In particular, the neglect of investment in the Midlands as a media and creative hub until now has been a remarkable oversight, and we would urge the government / BBC to prioritise investment in this region in the short-term.

**Question 21. What, if anything, do you think the BBC could do to fill skills gaps in the creative sector?**

This is a policy issue and cannot be solved by the BBC alone. It relates to the education system, the strategic investment in the media and broadcasting sector by government. However, the BBC can work on improving working conditions and leading by example for the sector, so that retention and career progression are more robust, and to eliminate the existence of precarious working conditions, including short term contracts, and to ensuring diversity of thought, as well as representation, is embedded in all levels of the BBC. Attention

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<sup>13</sup> Laurison, D. & Friedman, S. (2020). *The class ceiling: Why it pays to be privileged*. London: Oxford University Press; Hesmondhalgh, D. & Baker, S. (2011). *Creative labour: Media work in three cultural industries*. London: Routledge.

should be paid not only to broadcast divisions, but also to non-broadcast career paths, including R&D, management and other organisational functions. In its role as a commissioner of services, it can also embed good working practices and support for skills development in contractual terms (much as some academic research grants require evidence of support that will be provided for junior researchers if a contract is awarded).

**Question 24. If you represent an organisation in the creative industries, please share your reflections on your experience of the current market impact regulation process and how it could be improved.**

It is telling that the Charter Review survey seeks to limit responses to this question to just those organisations which may have directly experienced the BBC's market impact regulation. The nature of the expanded market impact framework introduced under the current BBC Royal Charter is that it has further tipped the scales of BBC regulation away from the public interest and towards the commercial interests of the BBC's competitors. Ofcom's suite of market impact tests and materiality assessments are geared almost exclusively towards preventing the BBC adversely affecting other broadcasters or media sectors, with scant regard for the benefits (or harms) for audiences of changes in BBC services. This is exemplified by the disastrous cuts to the BBC's local radio and news networks, approved by Ofcom on the basis of negligible market impact, but which have since substantially worsened the scale and quality of service available to audiences in these crucial spaces of social connection and local journalism.

### Additional comments

It is crucial to note that the BBC's investment – whether in R&D or in the creative workforce – is made with public money. Benefits from that investment should not be returned to private hands, but must be delivered back to the public either in the form of reinvestment in the BBC, or a public service broadcasting fund to complement the licence fee. Currently a small proportion of its commercial revenue from BBC Studios is reinvested in its public service provision. Transparency in where commercial income is invested, how it supports R&D to secure the future of public service media, and how it supports the continued development and security of our creative workforce and industries is essential. Second, there is an assumption that the BBC has to live with exploitative commercial infrastructures, but the case for a public service media infrastructure, including a [public service internet](#), is very strong. The BBC should be at the forefront of supporting this work, and its partnerships should include researchers working at the cutting edge of this fundamental mission (see, e.g. [Ehud Shapiro](#) and [Andrew Lewis-Pye](#) at LSE).

### Sustainable and fair funding

In the following questions, the assumption is that the licence fee remains the mechanism for funding the BBC. **We fundamentally disagree with this assumption.**

We have answered the questions based on the sentiment (e.g. of funding supporting a wide range of services and output). They should not be taken as support of the licence fee itself. See our answer to **question 32** for details about our position on the licence fee.

Question 25. To what extent do you agree that the licence fee should continue to fund a wide range of services and output that aim to inform, educate and entertain audiences?

MRC response: **Strongly agree – The licence fee should definitely fund a wide range of services and output that aim to inform, educate, and entertain.**

Question 26. To what extent do you agree that the BBC should use the funding it receives through the licence fee to deliver a broad range of benefits to the UK? This could include objectives such as investing in the nations and regions to drive growth across the UK, and developing skills that support the creative economy.

MRC response: **Strongly agree – The BBC should definitely use the licence fee to fund a broad range of benefits to the UK and the creative economy.**

As we have detailed previously, the BBC already makes a significant contribution to the UK economy. This is because of – and not in spite of – its nature as a publicly-funded organisation with distinct purposes for investing in media content, media technologies and services that support the social, cultural and democratic needs of the British public.

Support for the ‘spillover benefits’ of the licence fee should not be taken as endorsement for Government ‘top slicing’ or ringfencing portions of the BBC’s public income to fund projects or initiatives that are not directly connected to the BBC’s core mission as a provider of universal media content and services in service of the Public Purposes.

Question 27. To what extent do you agree that the scope of the licence fee should be reformed to support the BBC’s long term sustainability, which could involve requiring more households to pay but with each paying less?

MRC response: **Strongly agree – The licence fee should definitely be reformed to support the BBC’s long term sustainability.**

Question 28. To what extent do you agree or disagree that BBC content or services should carry advertising, bearing in mind how this could provide a new income stream for the BBC, how it might impact the audience experience and the impact on other broadcasters?

MRC response: **No advertising – The BBC should not carry any advertising on its content and services.**

The Green Paper recognises that [the TV advertising market is in terminal decline](#). Throwing a new ad-buyer the size of the BBC into this sector would drive down the price of advertising, tanking revenues not just for an ad-funded BBC but for ITV, Channel 4, Sky and the wider

commercial TV and radio sectors. As [the Advertising Association's Konrad Shek put it recently](#), “the BBC is likely to eat into a shrinking pie rather than expanding it”.

Non-linear advertising on the BBC's digital services is unlikely to hold much value either. Search and online display advertising – dominated by Meta and Google – makes up three-quarters of the UK's growing ad market, while spend on most 'traditional' kinds of advertising is consistently falling. BVoD advertising i.e. personalised digital ads on streaming platforms, accounted for [just 3% of ad revenue in 2024](#). When the Green Paper claims that the BBC could “potentially generate significant revenue” from advertising, it appears to be imagining a vast wealth of future BBC revenues that simply does not exist.

Aside from the total absence of any economic base and the knock-on harm to the UK's wider broadcasting sector, allowing advertising on the BBC would fundamentally alter the relationship between the BBC and its audiences, and weaken the BBC's obligations to provide a universal service that is catered to and accessible for all audiences. Advertising necessarily entails creating programmes or services that appeal to the largest possible audiences, or audiences that are most attractive to advertisers (typically more affluent or homogenous groups).

**Question 29. Would you be willing to pay for a BBC top-up subscription service focused on premium and entertainment content, in addition to your licence fee, assuming it was a similar price to other popular video-on-demand subscription services?**

**MRC response: Strongly disagree – I would definitely not be willing to pay for a BBC top-up subscription service focused on premium and entertainment content.**

**Question 30. To what extent do you agree or disagree that new concessions for households facing significant financial pressures should be introduced?**

**MRC response: Agree – The government should introduce new TV licence concessions for households facing significant financial pressures only if there are no negative impacts on the BBC or higher costs for other households.**

**Question 31. To what extent do you agree or disagree that technology should be used to support compliance, for example by requiring households using BBC iPlayer to enter details from their TV licence?**

**MRC response: Neither agree nor disagree – no opinion either way**

Any use of technology to validate or facilitate audiences' access to BBC content will have to be supported by a wide range of (potentially unmanageable) protections for audiences' universal access to BBC content. Households without reliable or sufficient broadband connections and vulnerable audiences impacted by the 'digital divide' should be foremost in developing any kind of 'iPlayer pass', to ensure that these groups are not unfairly subject to the licence fee enforcement regime.

Ultimately, Charter Review can skirt this matter of technological compliance altogether by ending the device-specific conditions for paying the licence fee, and instead transform the BBC's public funding model into a universal household scheme paid by all - irrespective of services or devices used.

**Question 32. Do you have any other views on the BBC's funding model that you wish to share?**

The licence fee as a funding model is deeply unpopular, outdated and unfair to the poorest households<sup>14</sup>. It entrenches political interference from government and has become a political football, as well as repeatedly top-sliced so that its value to the BBC's core income has declined massively<sup>15</sup>. It is applied based on an irrational logic that means online services and radio are not covered. This, plus increasing levels of evasion<sup>16</sup>, mean it will not sustain the BBC's future. Advertising and subscription would not replace the licence fee<sup>17</sup> and would fatally undermine the BBC's public service remit and irreversibly alter its ethos. No other country with a robust PSB system funds PSM using a licence fee<sup>18</sup>

The German *rundfunkbeitrag* & KEF model provides an example of a household levy, adjusted for ability to pay, that is largely seen as legitimate and could be adjusted for effective delivery in the UK<sup>19</sup>. The government could introduce an independently set public media levy, regularly reviewed, based on what the independent body assesses is needed for the BBC to operate. The justification would be based on the reality that the BBC is part of our critical national infrastructure<sup>20</sup>, that almost every citizen accesses its services every week. All households would pay via council tax and would be a wider range of concessions and exemptions that take a more equitable account of household circumstances, potentially including income. The system would also reduce collection costs and evasion.<sup>21</sup>

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<sup>14</sup> See YouGov (2025). How fair is the BBC licence fee? <https://yougov.com/en-gb/trackers/how-fair-is-the-bbc-licence-fee>.

<sup>15</sup> See VLV Report into BBC public funding 2010-2024. London: Voice of the Listener and Viewer.

<https://vlv.org.uk/wp-content/uploads/VLV-Report-into-BBC-public-funding-Revised-November-2024.pdf>

<sup>16</sup> Public Accounts Committee (2025). *BBC accounts and trust statement, 2024-25*. London: Westminster.

<sup>17</sup> See [Ampere Analysis' submission](#) to the House of Lords Communications and Digital Committee inquiry into BBC future funding, March 2022

<sup>18</sup> Born, G. & Lewis, J. (2025). *Public service media: Funding and governance options*. London: British Academy.

<sup>19</sup> Ramsey, P., & Herzog, C. (2018). The end of the television licence fee? Applying the German household levy model to the United Kingdom. *European Journal of Communication*, 33(4), 430-444.

<sup>20</sup> Frischmann, B. M. (2017). *Understanding the Role of the BBC as a Provider of Public Infrastructure*. Cardozo Legal Studies Research Paper No. 507, Available at: <http://dx.doi.org/10.2139/ssrn.2897777>

<sup>21</sup> See also our [submission](#) to the 2024 DCMS BBC funding review and the [Alternative Green Paper](#) for new funding models.