

## Media Reform Coalition

### Submission to the House of Commons Culture, Media and Sport Select Committee's inquiry on BBC Charter Review, April 2026

#### EXECUTIVE SUMMARY

The Media Reform Coalition's recommendations for BBC Charter renewal:

1. **The next BBC Royal Charter must introduce a defined process and standards for how BBC Charter renewal is conducted**, to guarantee transparency, public accountability and democratic decisions on the BBC's future.
2. **The BBC should be transformed into a democratic mutual organisation, owned and run by its members – the UK public – with defined rights and powers to shape BBC decision-making.**
3. **The outdated, unfair and failed TV licence fee should be replaced by a 'Public Media Levy',** paid by all households, to reflect the BBC's universal reach and essential democratic purpose.
4. **Advertising and subscription should not be introduced on the BBC's UK public services in any form.**
5. **The Government's exclusive powers to appoint BBC Board members, determine the BBC's public income and decide the terms of the Royal Charters must be abolished.**

The MRC also recommends **expanding the Public Purposes** by requiring the BBC to:

6. **Promote media literacy, advancing the public's rights as active, informed and engaged citizens in a highly mediated society.**
7. **Serve as an 'anchor institution' for the UK's local media**, creating partnerships with independent media and civic institutions, and opening the BBC's local resources to community use.
8. **'Bring the world to the UK', making the UK aware of international issues as well as different cultures and viewpoints of people around the world through media, art and culture – as previously required under the 2007-2016 Royal Charter.**
9. **Deliver to the public the benefit of emerging media and communications technologies**, and taking a lead in innovation for public good – as previously required under the 2007-2016 Royal Charter.

## INTRODUCTION

10. Since 2011, the **Media Reform Coalition (MRC)** has been at the forefront of the UK's media reform movement. We produce expert analysis and original proposals for building a more independent, accountable, plural and democratic media.<sup>1</sup> MRC members include world-leading academics and experts in media policy, journalists and media workers, activists and members of the public. In all our work we collaborate closely with civil society groups, campaign organisations, policymakers and independent media.
11. The MRC welcomes this opportunity to engage with the Committee's work on BBC Charter Review. This submission features the MRC's analysis of the BBC and the Government's ongoing Charter Review process, along with our recommendations for radical BBC reform across governance, funding and its public service mission. We hope to be invited to present further evidence and to outline our proposals to the Committee in the course of your inquiry.
12. The future of the BBC, and UK public service media more broadly, is a central part of much of our research, analysis and advocacy. From 2021 to 2025 we ran **BBC and Beyond**, a public consultation and campaign funded by the Joseph Rowntree Charitable Trust, exploring the need to reimagine public media, concluding with the **Manifesto for a People's Media**.<sup>2</sup> The MRC worked closely with MPs, peers, media workers and others in successfully opposing the privatisation of Channel 4, and we are founding members of the **Citizens' Forum for Public Service Media** – a coalition of civil society and audience groups supporting high-quality universal public media in the UK.<sup>3</sup>
13. In March 2026 we published the **Alternative Green Paper** – an open, collaborative compilation of proposals for BBC reform, featuring submissions from civil society, campaign groups, media experts and individual members of the public.<sup>4</sup> In addition to this MRC submission, we warmly encourage Committee members to explore and engage with the various proposals in the Alternative Green Paper to inform their evidence-gathering and deliberations.
14. During the previous BBC Charter Review debates from 2014 to 2016, your predecessor Committees in both the Commons and Lords provided an exemplary forum for evidence gathering, expert testimony and parliamentary scrutiny of proposals for BBC reform. Across three separate inquiries lasting a combined 27 months, these Committees spoke to numerous media experts, industry stakeholders, civil society groups and members of the public, which helped to create landmark reports on the BBC, its future and the Government's conduct during Charter Review.<sup>5</sup>
15. We hope this inquiry will take on that spirit, and facilitate a wide-ranging, evidence-led and open debate on Charter Review. It is vitally important that Parliament – through the Committee – ensures that BBC Charter renewal is informed by the widest possible range and diversity of views, interests and evidence – especially from voices beyond established media industry stakeholders

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<sup>1</sup> See the Media Reform Coalition's [Media Manifesto 2024](#) and our '[Who Owns The UK Media?](#)' reports on media concentration and consolidation across TV, radio, online platforms and the press.

<sup>2</sup> See [BBC & Beyond website](#) and the [Manifesto for a People's Media](#), 2022.

<sup>3</sup> [Citizens' Forum for Public Service Media](#).

<sup>4</sup> Media Reform Coalition, '[The Alternative Green Paper](#)', March 2026.

<sup>5</sup> See Commons Committee reports '[Future of the BBC](#)' [HC 315](#) (February 2015), '[BBC Charter Review](#)' [HC 398](#) (February 2016) and Lords Communications and Digital Committee report '[BBC Charter Review: Reith not revolution](#)' [HL 96](#) (February 2016).

and professional political influencers who typically dominate policy debates about the BBC and UK media.

## REFORMING THE BBC CHARTER REVIEW PROCESS

16. The BBC has been a cornerstone of British society, culture and our democracy for over a century, but is now facing widely-documented existential challenges. This current BBC Charter Review is therefore a once-in-a-generation opportunity to ensure the BBC truly serves the British public, and to address overlapping crises affecting UK media, politics and society. **It follows that the British public – the BBC’s owners, funders and singularly most important stakeholders – deserve a direct role in debating and deciding what kind of BBC we want, how it is organised and what its purposes should be.**
17. In this context, **the Charter Review process currently being conducted by the Government is appallingly opaque, lacking in meaningful accountability and deeply antidemocratic.** In the four months since the Department for Culture, Media and Sport (DCMS) published its Green Paper proposals on BBC reform, the clear intention has been to rush the Charter renewal process without any real opportunity for scrutiny, open debate or serious public participation.
18. The DCMS public consultation was open for just 12 weeks (including a period over the Christmas holidays), and neither the Government nor the BBC took serious efforts to widely encourage the public to contribute. The online survey itself comprised 32 tick-box questions, many of which were poorly designed or expected expert subject knowledge on intricate matters of BBC governance and regulation. Some core questions were clearly leading in favour of the Government’s policy preferences, and most did not include a ‘free text’ box for the public to expand on their thoughts. Rather than an exercise in sincere public opinion-gathering and deliberation, this consultation seemed tailor-made to squash the public’s views on the BBC’s future into a handful of statistical summaries.<sup>6</sup>
19. The DCMS Terms of Reference for Charter Review indicate that **this survey may be the only opportunity for licence fee payers, the BBC’s audiences and the wider public to engage with and shape BBC Charter Review<sup>7</sup>** – and wider media commentary seems to have confirmed this is the case.
20. Worse still, **DCMS Ministers have repeatedly undermined the purpose and value of public participation in policymaking, by making unilateral decisions on BBC reform before, during and immediately after the Green Paper consultation.** These decisions have concerned vital matters about the BBC’s funding and governance which should be subject to public debate: ruling out general taxation as an alternative public funding model for the BBC<sup>8</sup>; refusing to consider extending licence fee discount or exemptions to certain kinds of households<sup>9</sup>; and abolishing the Royal Charter’s expiry date – currently the only faint means for officially subjecting the BBC to serious public debate.<sup>10</sup> Announcing these changes without evidence or public support only further

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<sup>6</sup> See MRC analysis of the Green Paper consultation document and survey, [‘A blueprint for permanent decline: the DCMS Green Paper on BBC Charter review’](#), 19 December 2025.

<sup>7</sup> DCMS, [‘Review of the BBC Royal Charter 2025 to 2027 – Terms of reference’](#) 16 December 2025.

<sup>8</sup> BBC, ‘Culture secretary rules out funding BBC from taxes’, 17 January 2025.

<sup>9</sup> [BBC Charter Renewal Westminster Hall debate](#), 6 January 2026. Hansard, HC Deb vol. 778, col. 89WH.

<sup>10</sup> DCMS, [‘Culture Secretary speech at Society of Editors conference 2026’](#), transcript 17 March 2026.

demonstrates the BBC's lack of independence from arbitrary Government interference, stemming from powers granted in the Royal Charter.

21. If the BBC's next Royal Charter does not command public support, it will lose the democratic legitimacy it needs to continue as a vital and valued public institution. This Government is at risk of repeating the same antidemocratic and unaccountable practices that defined the previous Charter Review in 2014-16, which fatally undermined the BBC's independence and the public's participation in debates on public media. Despite receiving 192,000 submissions to the 2015 BBC Green Paper consultation, DCMS Ministers openly dismissed the scale of public engagement in Charter Review as politicised and "not wholly representative."<sup>11</sup> This was followed by the Government commissioning additional polling and focus groups, with a clear intent to 'balance out' the overwhelming public opinion expressed in responses to the consultation.<sup>12</sup>
22. The Commons CMS Committee's 2015 'Future of the BBC' report – published prior to that consultation – heard extensive testimony about the imbalances of power inherent in Charter Review, which (while ostensibly a moment for wide-ranging public and Parliamentary debate on the BBC) is ultimately shaped and determined by an excess of unaccountable Government power. The report recommended creating a formal role for Parliament as part of Charter renewal:

**"Parliament must have an increased role in scrutinising the BBC's Agreement with the Secretary of State, and any amendments to it, and in scrutinising the draft Charter itself. This should conclude with a debate on the draft Charter and Agreement on the Floor of the House."**<sup>13</sup>

These recommendations were not taken forward as part of the 2017 BBC Charter and Framework Agreement settlement.

23. The previous Government's conduct as part of that review, along with the current Government's patterns of conduct emerging in this current review, clearly show that such reforms are essential. More importantly, the absence of any defined and meaningful *public* role in debating and deciding the BBC's Royal Charter urgently needs remedying. The BBC's legitimacy rests on high expectations of public accountability, as well as the public's sense of meaningful democratic connection to what the BBC provides. **If decisions about the BBC are made without the public's informed consent or participation, and instead dictated by the political priorities of the government of the day, the BBC is clearly not independent or accountable in the way demanded by its unique status as a publicly-funded and public service institution.**
24. The BBC's Royal Charter provides just one scant requirement for the public's role in Charter Review: Clause 59 requires that the Secretary of State "must consult" with the public in the course of making recommendations for Charter renewal. This Clause is the only formal definition of Charter Review as a mechanism of public policymaking. Nothing else in this clause or in any aspect of UK law or regulation defines how Charter Review should be conducted, details what 'consultation' with the public should entail, or features any expectations for transparency or accountability on the Secretary of State in exercising her powers to draft the Charter.

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<sup>11</sup> Daily Telegraph, 'BBC Charter review consultation hijacked by left-wing campaign group', 23 January 2016.

<sup>12</sup> The Independent, 'If Britain's creative industries are to stay world beaters, Culture Secretary John Whittingdale must fight for them', 18 January 2016.

<sup>13</sup> Commons Culture, Media and Sport Committee ['Future of the BBC' report](#), para 345, pg. 113.

25. **The next BBC Royal Charter must introduce a defined process and standards for how BBC Charter renewal is conducted, to guarantee transparency, public accountability and democratic decisions on the BBC's future.** Clause 59 of the BBC Royal Charter should be revised and significantly expanded, with details setting out:

- the distinct stages of Charter Review and a minimum expected timetable for major points of consultation and decision;
- the role of the Secretary of State as a convenor of Charter Review, and not as the single point of decision;
- the expected 'make and manner' of any public consultations conducted by DCMS, including requirements to organise, resource and cooperate with deliberative public decision-making bodies (such as citizens' assemblies) created for the purposes of informing Charter Review;
- requirements on DCMS to openly respond to the conclusions of such deliberative decision-making bodies, and to explain (with evidence) which recommendations may or may not be taken forward;
- and requirements for any concluding 'White Paper' on the Government's Charter Renewal proposals to be tabled and debated by both Houses of Parliament.

These requirements could equally feature as part of a new section in the Framework Agreement, or (for additional safeguards against future governments revising or revoking a formally defined Charter Review process) established in statute as a 'BBC Independence and Public Accountability Law'.

26. Given the Secretary of State's stated intention to abolish the BBC Charter's 'expiry date', thereby granting the BBC a permanent Royal Charter,<sup>14</sup> there is an even stronger case for formally defining a clear process and expected standards for Charter Review. Crucially, an 'untimed' Review should not allow the current state of affairs to persist. Debate and decision controlled by the Government, with the extent of consultation and evidence-gathering determined solely by the political will or interest of Ministers and Civil Servants, is not democratic or accountable. Abolishing the supposed "recurring threat to the BBC's existence", as some have termed the Charter expiry date,<sup>15</sup> should not be used to further insulate the BBC (and the Government's powers over it) from genuine public accountability or democratic debate on its future, or to simply continue political interference and opaque private negotiations as the historically default form of Charter Review.

## **TRANSFORMING THE BBC INTO A MUTUAL ORGANISATION**

27. In our current relationship with the BBC, the public are audiences, licence fee payers and (occasionally) complainers. None of us, however, is a participant in any of the routine decisions about how the BBC is governed, what the BBC chooses to make, or how it serves the public interest. **Public media can, and should, provide a democratic forum for audiences to debate and decide what kinds of content or services we want, and to collectively explore the major issues in news, culture and entertainment that might fulfil our needs and interests as**

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<sup>14</sup> DCMS, '[Culture Secretary speech at Society of Editors conference 2026](#)', transcript 17 March 2026.

<sup>15</sup> Quoted in The Guardian, '[Lisa Nandy vows to give BBC permanent Charter to prevent political interference](#)' 17 March 2026.

**citizens.** This relationship can never be provided by commercial media organisations, which use audience size or profits as proxies for ‘what the public is interested in’.

28. In 2020, the now-Secretary of State for Culture, Media and Sport proposed “mutualisation” of the BBC, critiquing its lack of public accountability and democratic representation:

“To maintain the BBC as an institution, it must be accountable to those who fund it – the British people. Instead of tokenistic consultation with the people who pay for it, and backroom negotiations with the government, the BBC should move to a model of being owned and directed by licence fee holders – who can help decide the trade-offs that the BBC must make to secure its future.”<sup>16</sup>

29. These comments address many of the deeper failures in the BBC’s relationship with its audiences, and outline a progressive means to rebuild that relationship in an innovative, democratic and uniquely public way. We were therefore surprised that the Culture Secretary’s proposals for a mutual BBC were not featured as part of the DCMS Green Paper’s topics and questions for BBC reform.

30. In May 2025, the Media Reform Coalition published – in collaboration with the public ownership think-tank Common Wealth – our own proposals for how to **transform the BBC into a democratic mutual organisation**. The arts and cultural workers union Equity and Co-operatives UK, the UK’s network for cooperative organisations, have also supported and outlined proposals for mutualising the BBC.<sup>17</sup>

31. A mutualised BBC would continue to be an independent public service media institution, but one founded on a genuinely democratic relationship with the public. Like the current BBC, a mutualised BBC would have a mission to provide programmes and media services that benefit the public interest and are freely available to all. But unlike the current BBC, a mutualised BBC would be directly accountable to the audiences it serves and protected against interference from politicians and government.

32. **Under a new mutual constitution enshrined in the BBC’s Royal Charter, the public would be empowered as active and direct participants in how the BBC works.** Everybody in the UK would become a member of a mutualised BBC through their shared ownership and collective public funding of the BBC. Every member would have defined equal rights to collectively make major decisions about the BBC’s governance, its strategy and its services. Under our proposals, mutualisation would consist of three essential features defined within the constitution of the BBC in the Royal Charter:

33. First, a Members’ Council of randomly-selected BBC members would serve as the BBC’s sovereign governance body, holding BBC executives and management to account for delivering the BBC’s mission, and ensuring members’ interests are reflected throughout the operation of the BBC. The Council would be made up of 120 members, selected by lot to be representative of the

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<sup>16</sup> Lisa Nandy, [‘I will defend a free media. Here’s how the BBC should be reformed’](#), LabourList, 22 February 2020.

<sup>17</sup> See [Equity’s Green Paper response](#), 9 March 2026 and Co-operatives UK’s proposals for [‘Turning licence fee into members fee to re-set the BBC relationship with the public’](#), 11 March 2026. <https://www.uk.coop/news/turn-licence-fee-members-fee-re-set-bbc-relationship-public>

UK population, with most serving a paid one-year term to allow for the continual circulation of new ideas, perspectives and represented voices. The Members' Council would set the BBC's strategy (in the same manner as the BBC's current Annual Plans) in consultation with management, staff and the wider membership, while also exercising oversight of BBC regulation and governance.

34. The Members' Council would be supported by a Secretariat: the administrative arm of the Council with a formal mandate to organise the active and direct participation of the membership. The Secretariat would provide the Council and the Members' Panels (below) with the support and resources necessary to inform and empower members' control over how the BBC works.
35. Second, Members' Panels established throughout various aspects of the BBC's operations (e.g. news and current affairs, individual Nations and Regions, commissioning and commercial strategy). These Panels would function as 'mini-assemblies' to inform, engage in and scrutinise core aspects of how the BBC works as a media organisation, assessing and improving the BBC's operations and output in defined areas. These Panels would engage in a sustained and informed dialogue with BBC staff and the wider membership, providing greater transparency and public representativeness while also empowering the functions and skills of BBC journalists and creative workers.
36. Third, every member of a mutualised BBC would have the right to allocate part of the BBC's budget to fund independent public purpose content in news, educational matters and cultural projects. While BBC commissioners would still hold significant authority and resources to direct the BBC's production and buy-in of new programmes (under the broader scrutiny of the Council and Panels), this would give BBC members significant power to discover and support new public service content through an effective public 'crowd funder'. Public-led commissioning would be regulated according to public interest criteria, notably an expectation that any member-commissioned content fulfils the BBC's Public Purposes (as set and regulated by the Council) like all BBC activities.

## THE BBC'S PUBLIC FUNDING

37. The TV licence fee, as a model for funding a national, universal, public media organisation, has clearly reached a dead end. The BBC's ability to fulfil its public service obligations during this Charter period (2017-2027) has been fatally undermined by two things: 15 years of a forcibly reduced public income, stemming from the 2010 and 2015 Government funding settlements which froze the TV licence fee below inflation; and the persistent decline in households meeting the device-linked requirements for paying the licence fee. **Political interference and policy inaction have together resulted in an almost-40% real-terms public funding cut to the BBC since 2010,<sup>18</sup> along with a shrinking overall funding base from the licence fee as audiences shift away from live TV.<sup>19</sup>**
38. The Government's Green Paper on BBC Charter Review rules out any substantially alternative public funding model for the BBC. Its proposed reforms to the licence fee amount to little more than tinkering at the edges of a deeply unpopular and failed funding model, describing the licence

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<sup>18</sup> Voice of the Listener and Viewer, '[VLV Report into BBC Funding](#)', 21 October 2024.

<sup>19</sup> See Ofcom '[Media Nations](#)' reports. In 2017 broadcast content made up 71% of UK adults' average audiovisual viewing time; by 2024 that figure had fallen to 56%, with even more pronounced declines and smaller shares amongst younger audiences.

fee as “tried and tested” without any evidence or basis to support this. Even with the Culture Secretary’s recent inflation-linked increase in the licence fee (to £180 a year for 2026/27), the sustained period of stagnant income means that BBC audiences are being charged more for a public service that is perpetually and visibly shrinking due to cuts.

39. Licence fee evasion (i.e. households that meet the licence fee conditions but do not pay) has been steadily rising, currently estimated at 3.2 million households or 12.5% of those eligible – amounting to £546m in ‘lost’ BBC income.<sup>20</sup> Additionally, approximately 2.8m UK households do not meet the licensable conditions; this figure is set to rise considerably as households move away from live TV, or opt not to engage with consistently shrinking BBC services. Unless the Government implements a robust mechanism to significantly cut evasion<sup>21</sup> or to expand the TV licence fee to other media (e.g. radio or streaming platforms), then **by 2040 – the likely end of the next BBC Charter period, or time of its next review – it is possible that fewer than half of all UK households will be contributing to funding the BBC.**
40. The BBC’s response to Charter Review, which also notes the severe impact of fewer households being ‘in scope’ of the licence fee, claims that **“the factors underlying these trends are permanent and irreversible and will deepen over the coming years”**.<sup>22</sup>
41. This also highlights the unworkable flaws in the hinted proposals (from both DCMS and the BBC) to cut the licence fee, in exchange for expanding the range of devices included in the requirements to pay it.<sup>23</sup> **If the TV licence fee was cut by e.g. 20% as part of Charter renewal (amounting to a £3 monthly household saving, enough to be ‘felt’ by households), the licensable conditions would need to be expanded to immediately attract (or, more realistically, compel) 6.6 million new fee-paying households, just to keep the BBC’s public income stable.** This is equivalent to ‘capturing’ 80% of all households that are currently either evading the licence fee, or don’t meet the licensable conditions, and could not be achieved by eliminating evasion alone. This retail ‘cut’ would also only last a year, as the BBC would require routine inflation-linked increases or else face another period of sustained real terms lost income.<sup>24</sup>
42. The DCMS Green Paper’s proposals for introducing advertising and/or subscription on the BBC’s UK public services similarly do not stand up to evidence or financial realities. Bizarrely, the Green Paper recognises that the TV advertising market is in terminal decline but still claiming that the BBC could “potentially generate significant revenues from carrying advertising on its public services”.<sup>25</sup> Throwing a new ad-buyer the size of the BBC into this declining sector would drive down the price of advertising, reducing revenues not just for an ad-funded BBC but for ITV,

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<sup>20</sup> BBC, [‘Television Licence Fee Trust Statement 2024-25’](#), 15 July 2025.

<sup>21</sup> Through e.g. a ‘digital licence’ that restricts access to iPlayer to a registered licensed household account or ID – which would have considerable technical difficulties and risk the universal accessibility of BBC content.

<sup>22</sup> BBC, [‘A BBC For All: Our response to the government’s Green Paper’](#), 5 March 2026. Pg. 91.

<sup>23</sup> Sunday Times (£), [‘BBC considers return of radio levy to cut licence fee for all’](#), 31 January 2026. See also Question 27 in the DCMS Green Paper consultation survey – ‘To what extent do you agree or disagree 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?*’ (emphasis added).

<sup>24</sup> MRC calculations based on TVLA reports and ONS household population projections, data available on request.

<sup>25</sup> DCMS, [‘Britain’s Story: The Next Chapter. BBC Royal Charter Review Green Paper and Public Consultation’](#), December 2025, pg. 69. See also Ofcom’s [‘TV Advertising Sector’ discussion paper](#), February 2025.

Channel 4, Sky and the wider commercial TV and radio sectors.<sup>26</sup> As the Advertising Association’s Director of Public Policy and Regulation, Konrad Shek, recently noted: “the BBC is likely to eat into a shrinking pie rather than expanding it”.<sup>27</sup>

43. Introducing advertising on the BBC’s digital services, which the Green Paper proposes as a ‘ad-lite’ option, 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.<sup>28</sup> BVoD advertising i.e. personalised digital ads on TV streaming platforms, accounted for just 3% of advertising spend in 2024.<sup>29</sup> When the DCMS Green Paper claims that the BBC could “generate significant revenue” from advertising, it is imagining a lucrative market that simply does not exist.
44. Although there is potential for the BBC to increase the commercial share of its total revenue (through e.g. further international distribution and monetised overseas productions), this is unlikely to be sustainable, let alone a feasible replacement for public funding. Intense global competition for generating and selling new IP has put the BBC on uneven footing against the dominant streaming giants and international media networks, who are at once the BBC’s rivals and its biggest partners for distributing and monetising BBC content outside the UK.
45. On the basis of the clear evidence against commercial forms of funding, and the significant negative effect that advertising and/or subscription would have on the BBC’s mission to serve the needs and interests of all audiences, regardless of their size or commercial appeal, **advertising and subscription should not be introduced on the BBC’s UK public services in any form.**
46. The TV licence fee has the advantage that it regards the BBC’s audiences as equally important in economic terms, in contrast to commercial models, like advertising or subscription, which seek out the largest, most homogenous or most affluent consumer base. But the licence fee is a regressive method for financing a modern public media institution, and leaves the BBC dangerously exposed to political interference – as shown by successive government settlements that have provided neither independence nor economic security. The TV licence fee also fails to reflect that public media benefits British society, culture and democracy for everybody in the UK, regardless of media services used, devices in the home or even direct interaction with the BBC.
47. The future of the BBC depends on a radically reformed, modern public funding model that is progressively rated, independent of government and supports a universal service across media platforms, while also acknowledging differences in the ability of households to contribute. **The outdated, unfair and failed TV licence fee should be replaced by a ‘Public Media Levy’, paid by all households, to reflect the BBC’s universal reach and essential democratic purpose.** Rather than linking public funding for the BBC to certain devices or services, the Public Media Levy would embody the principle that collective national investment in independent, universal public media is essential for a healthy democracy, social cohesion and cultural expression.

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<sup>26</sup> Richard Broughton / Ampere Analysis, [‘Supplementary written evidence to the House of Lords Communications and Digital Committee inquiry into BBC future funding’](#), March 2022.

<sup>27</sup> Quoted at the [Westminster Media Forum](#), 20 January 2026.

<sup>28</sup> Media Reform Coalition, [‘Who Owns the UK Media? 2025 Report’](#), pgs. 11-12.

<sup>29</sup> Advertising Association, [UK advertising forecasts 2025/26](#), 30 April 2025.

48. The Public Media Levy would be collected as a precept through the existing council tax system, and offer concessionary rates or exemptions to households that are less able to contribute. This might include lower income households, single occupants or those in receipt of public welfare. Progressive rating should not mean wealthier households paying more, as this would create an incentive for the BBC to cater to this audience at the expense of others. Collection via existing council tax mechanisms would require careful scrutiny and management, though it could also increase the BBC's accountability to regional audiences and encourage greater investment in local content.
49. The power to set the level of the Public Media Levy would be given to an independent body, to remove government control over the BBC's purse strings as a mechanism for political interference. This body – in the vein of the independent 'Commissions' proposed by the VLV and British Broadcasting Challenge<sup>30</sup> – would be tasked with evaluating the financial needs of the BBC to fulfil its public service obligations, and determine a secure long-term funding settlement based on its assessment. This would also ensure that the BBC's funding is properly ringfenced, in contrast to a central government tax-based model that would be vulnerable to political capture.
50. By expanding the BBC's overall base of public income, **the shift to a Public Media Levy would significantly increase public investment in the BBC, and even allow for a multi-year freeze in the cost to ease the burden on households.** If a Public Media Levy model was introduced from 2027/28 and kept at the current £180 cost for 5 years, the BBC's public revenues would still increase by £1.36bn (compared to the projected income from a continued TV licence fee model). This would amount to 35% increase in public income that would immediately reverse the real terms lost income from 15 years of freezes and cuts to the licence fee, and reduce pressures on the BBC to increase commercial revenues.

## GOVERNANCE AND PUBLIC ACCOUNTABILITY

51. Transitioning to a new funding system is essential to ensure that all UK citizens have universal, equal access to media content that informs, educates and entertains free at the point of use. **A significant increase in the BBC's funding is necessary to reverse decades of decline, but this can only take place alongside reforms to the governance and public accountability of the BBC** – in particular by giving the British public a direct and active democratic role in how the BBC is run and governed (as we detail earlier in this submission).
52. The BBC is accountable only to Ofcom and Government Ministers (via the Charter, Board and licence fee). The BBC is also irregularly scrutinised by Parliament, the National Audit Office and through its own annual reporting. Yet scrutiny and evaluation in these forms is not the same as public accountability of a kind necessary for an independent public media institution. A fundamental shift in the relationship between the BBC and the public is needed, grounded in democratic engagement such as citizens' assemblies. **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 democratic accountability or direct engagement with the needs and interest of the public as citizens.

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<sup>30</sup> Voice of the Listener and Viewer, '[Briefing on BBC Charter renewal](#)', December 2025, pg. 11, and British Broadcasting Challenge, '[Funding: A universal licence fee for a universal service](#)', March 2026, pg. 2.

53. None of these principles is present in the DCMS Green Paper's proposals. Its discussions on accountability and independence pay plenty of lip service to "the social contract between the BBC and licence fee payers", but show no awareness of the necessary democratic basis of this contract, which has been absent since the BBC's foundation. The Government's suggested reforms default to worn-out distractions around enhancing transparency, new mechanisms to ensure "that everyone feels their voice has been heard", or tinkering around the edges of the BBC's current governance model – such as expanding Ofcom's regulation of the BBC, or introducing a more formal role for Parliament in holding the BBC to account.

54. These ideas have their merits, but would not go anywhere near far enough to deliver enhanced public trust, accountability or engagement with the BBC as a civic and democratic institution. This is particularly strange, given that the Government appears to understand current frustrations with the BBC's lack of accountability, for example in its comments on how the BBC needs to address "declining engagement with, and trust in, the BBC":

"Often the work undertaken is not widely promoted or understood, including low awareness from the public on how they can get involved and contribute their views. Engagement needs to happen in a way that is visible to audiences, ensuring that everyone feels that their voice has been heard."<sup>31</sup>

There is a deep irony that the Government has not applied this bold support for meaningful public engagement to its own Charter Review process, as we have outlined above.

55. **Reforms that seek to 'give the public a voice' in the BBC will only be effective if those mechanisms have longevity, accountability and genuine power.** The Green Paper's unimaginative suggestions for bureaucratic reforms or requirements for more 'listening exercises' are a long way away from addressing what the Government clearly recognises as an existential threat to the BBC's future.

56. **The Government's exclusive powers to appoint BBC Board members, determine the BBC's public income and decide the terms of the Royal Charters must be abolished.** We recommend that the status of the Board as the BBC's sovereign body be superseded by a Members' Council, appointed by lot from members of the public, who would take on the substantive work of holding the BBC's management to account and setting the strategy of the organisation. Failing that, we concur with numerous other organisations in calling for Board appointments to be made entirely independently of Government, ideally through an expanded process involving the Commissioner for Public Appointments or a insulated process in the style of the appointments process detailed in the Royal Charter on Self-Regulation of the Press.

57. The recent crisis around the leaked BBC Board memo, and the on-going allegations of entrenched political interference by serving BBC Board members, has helped bring greater public awareness to **the antidemocratic and unjustifiable role of political appointees on the BBC Board**.<sup>32</sup> Shortly before the Green Paper was published, ending the government's power to directly appoint BBC Board members seemed uncontroversial and incontrovertible. Yet the Green Paper avoids acknowledging the obvious political interference that stems from Board appointments. It offers

<sup>31</sup> DCMS Green Paper, pg. 22.

<sup>32</sup> Counterfire, '[Has there been a coup at the BBC](#)', 11 November 2025; Byline Times, '[BBC bosses draw up plans to win over Reform voters by changing news and drama output](#)', 9 June 2025.

only, in non-committal tones, to consider “whether there should be a change to the government’s role in appointing Board members”.

58. The consultation questions give further clues about the Government’s reluctance to surrender its power: Question 8 on “enhancing the BBC’s accountability” provides an option “reducing the government’s role in board appointments *to appointing the Chair only*” (emphasis added). Like many of the consultation questions, this leading framing attempts to shut down any discussion of reforms that might go beyond what is acceptable to Government. Even if the public wanted to see an end to political appointments entirely, it seems the Government has already decided for us that this simply isn’t within the scope of Charter Review.

## EXPANDING THE BBC’S PUBLIC PURPOSES

59. The DCMS Green Paper suggests several changes to the current Public Purposes, yet the Government has provided little rationale or justification for these:

60. The Green Paper suggests updating the BBC’s existing Public Purpose for providing “impartial news and information” to include a specific requirement for accuracy. The BBC already has strong requirements for news accuracy as part of its editorial guidelines, the binding standards code for BBC news content which are regulated by Ofcom. The Green Paper does not make clear what would be gained or changed given accuracy is already embedded in BBC practice, nor how this would enhance the process by which complaints are handled – which is a far more practical and necessary space for reform to improve BBC news standards and public trust.

61. The Green Paper also proposes requiring the BBC to “drive economic growth across the UK and support the creative economy”. The BBC already acts as a major investor in and catalyst for the UK’s creative industries, contributing £5bn annually to the UK economy.<sup>33</sup> Creating a specific Public Purpose for ‘growth’ risks compelling the BBC to put economic concerns above its core mission to serve the needs and interests of audiences as citizens. This would also compromise the BBC’s independence, by entrenching a political priority of the Government into the BBC’s constitution and directing Ofcom to evaluate economic ‘success’ in contest with the BBC’s social and cultural benefits.

62. The Green Paper’s discussion on research and development suggests restoring “research, development and innovation” as part of this proposed Public Purpose for economic growth, but framed exclusively in terms of industrial benefits – for example by sharing technological innovations with the wider (predominantly commercial) media sector. The BBC’s 2007-2016 Royal Charter framed the BBC’s technological contributions as a public benefit, yet the Green Paper discussions serve only to reinforce the marketisation of public media.

63. **Charter renewal should re-establish the BBC as a *public* institution, yet the Green Paper shows no indication of enhancing the social, cultural and democratic benefits the BBC could provide**, or restoring Public Purposes from the 2007-2016 Charter which were abolished as part of the last Charter Review.

64. Similarly, the Green Paper does not consider Ofcom’s role in regulating the BBC’s fulfilment of the Public Purposes and whether Ofcom – a regulator with a statutory duty to promote competition

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<sup>33</sup> KPMG, [‘An assessment of the economic impact of the BBC’](#), March 2021.

and the interests of ‘consumers’ – is the right body to assess social, cultural and democratic impacts. We agree with the proposals from the CPBF North that “Ofcom should have a more limited role in regulating the BBC”, especially in relation to the assessment of the Public Purposes and the setting of the BBC’s operating licence.<sup>34</sup>

65. We recommend that the next BBC Royal Charter should introduce four new/restored Public Purposes, requiring the BBC to:
66. **Promote media literacy, advancing the public’s rights as active, informed and engaged citizens in a highly mediated society.** The BBC currently delivers media literacy resources and activities, but it is not particularly well-connected with the sector and it tends to deliver these resources in isolation from other initiatives. The proposals in the Green Paper for the BBC to deliver media literacy do not acknowledge this context other than recognising that other organisations also work on media literacy – this will only have the effect of enshrining existing practice, rather than expanding them or maximising the benefits that it might generate for citizens.
67. **Serve as an ‘anchor institution’ for the UK’s local media,** creating partnerships with independent media and civic institutions, and opening the BBC’s local resources to community use. The BBC should take a leading role in restoring local news and media in the UK, by partnering with independent providers and civic institutions and facilitating community access to its resources to produce local public interest media.
68. The UK’s local media faces an existential crisis, driven by corporate consolidation, concentrated ownership, and mass closures of local newspapers, radio stations and community media outlets across the UK.<sup>35</sup> The Green Paper recognises the crisis in local media, but repeats the commercial sector’s claims that the BBC is ‘treading on the toes of the market’. It proposes expanding the Local Democracy Reporter Scheme (LDRS), and requiring the BBC to “explore partnerships with high quality local media outlets”. This is a sound principle, but in practice is vulnerable to capture by dominant commercial players– as with the LDRS, which currently acts as little more than a subsidy for corporate news publishers who account for 87% of LDR contracted awarded for 2025-27.
69. The BBC’s role in local media must have the needs and interests of local communities at its heart – and not prioritise protecting existing commercial players or merely addressing ‘market gaps’. The BBC should play a leading role in reinvigorating local media. The BBC’s local role should also encourage and facilitate a more collaborative and participatory relationship with local communities, enabling members of the public to commission and create their own local content using the BBC as a genuinely public resource.
70. **‘Bring the world to the UK’, making the UK aware of international issues as well as different cultures and viewpoints of people around the world through media, art and culture.** The 2017-2027 Royal Charter removed reference in the Public Purposes to “bringing the UK to the world and the world to the UK”, implying that British audiences had nothing to benefit from content and experiences from outside the UK. This led to a significant reduction in the BBC’s investment

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<sup>34</sup> CPBF North, ‘The future role of Ofcom in regulating the BBC’, featured in the [Alternative Green Paper](#).

<sup>35</sup> MRC [‘Who Owns the UK Media? 2025 Report’](#).

in content from around the world, exacerbating the reduction in international investment across UK public service broadcasting.<sup>36</sup>

71. **Deliver to the public the benefit of emerging media and communications technologies**, and taking a lead in innovation for public good – as previously required under the 2007-2016 Royal Charter. Research and Development has been central to the BBC's operations and success throughout its history, and has been a driver of broadcast innovations, from FM radio, the introduction of television, the development of text services such as Ceefax, and more recently, digital innovations including BBC iPlayer, Freeview, and new imaging technologies. However, increased competitive pressure on the BBC risks research being driven by market imperatives. The new Charter should re-establish a Public Purpose that requires the BBC to prioritise the public interest in its Research and Development strategy.

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<sup>36</sup> See also the [International Broadcasting Trust's submission to the DMCS BBC Charter Review consultation](#), March 2026.