

Document 1: BBC Charter Review

Public Consultation Response

Introduction

The Public Media Alliance (PMA) is the largest global association of public service media (PSM) organisations, with a primary role to support and advocate for the core values of public service media.¹ PMA has a well-established international reputation for its unique insight into PSM worldwide through our reports, research, engagement with our members, consultations with media stakeholders, and projects. We represent over 50 member organisations, from six continents. Through our advocacy work, we emphasise that a true public service media entity – regardless of where it is – must abide by a set of key values, including editorial and organisational independence, a secure source of public funding, quality journalism, impartiality, universal reach, accessibility, and crucially, accountability first and foremost to the public. We believe that these values² – when protected, emboldened, and ensured – are what make PSM among the most trusted media outlets, and allow them to fulfil their role to inform and underpin democracy.

The UK Government's BBC Charter Review³ is a generational opportunity to futureproof the British Broadcasting Corporation (BBC) and set it up for a more secure, successful and sustainable future over the next Charter period and beyond, in a media landscape that is rapidly changing and at a time of growing geopolitical uncertainty. This Charter has the potential to renew the BBC in multifaceted ways that speaks to the heart of what the BBC is and should be:

- A BBC that is relevant, accessible and universal, in an era of rapid change in the media market;

¹ <https://www.publicmediaalliance.org/about-us/>

² <https://www.publicmediaalliance.org/knowledge-hub/what-is-psm/#psm-values>

³ <https://www.gov.uk/government/consultations/britains-story-the-next-chapter-the-bbc-royal-charter-review-green-paper-and-public-consultation/britains-story-the-next-chapter-bbc-royal-charter-review-green-paper-and-public-consultation>

- A BBC that is independent from government with robust safeguards protecting it from political interference;
- A BBC that is visible and accountable to its most important stakeholder – the public;
- A BBC that is a trusted source of independent news and information in the UK and internationally at a time of growing geopolitical uncertainty;
- A BBC that is an essential cornerstone of UK democratic society, building resilience, media & information literacy, and social cohesion.

The Review's Terms of Reference recognise increased global competition, changing viewing habits, and pressures on licence fee income, and they place particular emphasis on ensuring the BBC's financial sustainability and maximising public trust in the corporation and its output.

PMA welcomes the focus of the Charter Review on three core objectives: a BBC that is sustainably funded, a BBC that commands the public's trust, and a BBC that drives growth, opportunity and good jobs across the nations and regions of the UK.

In this submission, we focus on four aspects of this Review that we believe are central to the BBC's future: funding, governance, critical infrastructure, and accountability. Of these, funding is the linchpin. Without a funding mechanism that adequately supports the BBC's mission and its independence, the ambitions set out in this Review cannot be realised. A BBC delivering upon its Public Purposes is not achievable without the financial foundation to sustain them. The most well-designed governance structures and accountability mechanisms will fall short if the BBC is not adequately resourced to deliver on them.

Further, given our position and expertise in the global public service media industry, we will demonstrate how international examples can help guide decisions about the BBC, and how the Charter can best deliver positive outcomes for this most vital of UK institutions.

For transparency, it should be noted that the BBC is a member of PMA. Phil Harrold, Interim Chief Operating Officer, BBC News, is a member of the PMA Board⁴.

⁴ <https://www.publicmediaalliance.org/new-pma-board-elected/>

Chapter 1:

A BBC that is sustainably and independently funded

Sustainable, long-term and independent funding is the foundation that enables the BBC to deliver its mission and public purposes. It is essential for consistency, universality, and independence. PMA's position throughout this submission rests on this point: the governance reforms, accountability mechanisms, and democratic functions we call for are only meaningful if the BBC is adequately resourced to deliver on them. A BBC constrained by funding uncertainty cannot plan for the long term, cannot modernise and innovate at the pace the media landscape demands, and cannot fulfil its public service remit with the consistency that builds and maintains public trust. Funding is the condition that makes the many considerations possible, not simply one among many.

We are therefore concerned about the future viability of the licence fee as a sustainable funding model for the BBC. Firstly, it is important to recognise the benefits of the existing licence fee model, which has served the BBC for decades and has proven resilient over that time:

- It offers a **well-established direct link between the BBC and the public it serves**, which is important for accountability, first and foremost, to the public.
- It is **universal**, ensuring the BBC is funded by the public at large. This is essential for the provision of universal service.
- It contributes to the organisation's **independence from government**. The BBC's responsibility to collect the licence fee means the institution remains at arm's length from government and cannot be impacted by short-term political decisions by the government of the day. This independence also bolsters public trust in the BBC as an institution independent of government.
- It supports **long-term security**, with the BBC often given multi-annual funding settlements, allowing the organisation to plan for the future and make the necessary business and financial decisions to evolve.

However, the licence fee has several shortcomings that the new Charter can address:

- It is **linked to live TV services**. While no longer depending upon TV ownership, this model remains outdated and causes confusion, sitting uneasily in a

multiplatform, multi-device era. While the vast majority of people in the UK use BBC services monthly, fewer than 80% pay the licence fee.

- It is **not progressive**, charging a flat rate for all eligible fee payers, though as noted above, this also underpins universality.
- It remains **vulnerable to government interference**, with the government of the day responsible for setting the rate on a multi-annual basis, with the ability to top-slice the fee for other priorities. With limited external scrutiny, this process can become politicised regardless of the framework around it.

We recommend the government to explore alternative funding models, or significant reform to the licence fee setup, to better ensure transparency and independence.

PMA's starting point in any discussion of alternative funding models⁵ is that the model must meet the following conditions:

- The funding model, in both its allocation and collection, **must be protected from government interference and threats**, ensuring public media can hold power and authorities to account without fear or favour and without risk of punitive action.
- The funding model **must provide long-term security and guarantees**, ensuring public media can plan for the future and adapt to changing media environments rather than operating in cycles of uncertainty.
- The funding allocation **must be protected against real terms reductions**, for example by linking the fee to inflation, so that public media's base resource keeps pace with the cost of delivering its public service remit without cuts.
- The funding model **must establish and/or maintain a direct link between the public and the public media**, preserving the principle that the institution is accountable to the people it serves, not to the government that oversees it.

It is important to note that where funding models work, they do so because they fit their local context. Any assessment of alternatives must therefore consider whether a given model is suited to the sociopolitical and economic circumstances of the UK, and whether it offers equivalent or stronger protections for the BBC's independence.

⁵ <https://www.publicmediaalliance.org/knowledge-hub/what-is-psm/psm-funding-models/>

Over recent years, there has been a notable move away from the licence fee internationally. Across Europe⁶, the heartland of truly independent public service media, the licence fee is no longer the default funding model, with public broadcasters moving away from it in countries including Slovakia⁷ and France⁸. Similar discussions are underway in Poland⁹, South Africa¹⁰, Ghana¹¹, and the Czech Republic¹².

At the same time, countries including Ireland¹³, Japan¹⁴, and South Korea¹⁵ have reaffirmed their commitment to the licence fee, regarding it as an effective means of funding public media, providing a direct link to audiences. Ireland, however, has pursued reforms to enforcement in response to persistently high levels of evasion.

Against this backdrop, it is useful to consider the principal alternative models in use around the world.

- **Direct government funding.** The model most commonly replacing the licence fee has been direct government funding. In France, the licence fee was replaced by a proportion of VAT revenue; in Slovakia, funding comes directly from the state budget. Direct government funding has functioned effectively in several countries over long periods, including for the ABC in Australia, CBC/Radio-Canada, and RNZ in New Zealand. It should be noted though that these latter cases have generally benefitted from a degree of political consensus around the value of public media and its independence. However, that consensus has not insulated public broadcasters in these countries from fluctuations in annual income or periods of institutional jeopardy. There is growing recognition that further reform may be needed: the Canadian

⁶ <https://www.publicmediaalliance.org/the-two-questions-shaping-the-public-media-funding-debate-in-2026/>

⁷ <https://enrsi.stvr.sk/articles/topical-issue/329781/parliament-approves-new-model-of-funding-for-rtvs>

⁸ <https://www.publicmediaalliance.org/vat-funding-for-french-public-media-approved/>

⁹ <https://businessinsider.com.pl/media/tvp-i-polskie-radio-wsparte-pieniedzmi-panstwa-najnowsze-dane-o-dotacjach/hdvbm8g#>

¹⁰ <https://www.sabcnews.com/sabcnews/sabc-sounds-alarm-over-funding-crisis-warns-of-possible-shutdown/>

¹¹ <https://www.publicmediaalliance.org/ghana-new-funding-model-must-support-gbcs-sustainability-and-independence/>

¹² <https://www.publicmediaalliance.org/media-freedom-groups-urge-czechias-government-to-uphold-public-medias-independence/>

¹³ <https://www.publicmediaalliance.org/a-new-funding-structure-and-some-added-certainty-for-rte/>

¹⁴ <https://www.publicmediaalliance.org/a-renewed-international-focus-concern-over-political-interference-the-pma-briefing/>

¹⁵ https://world.kbs.co.kr/service/news_view.htm?lang=e&Seq_Code=192450

government¹⁶, for instance, is currently exploring making public media funding statutory and subject to parliamentary approval rather than executive discretion. PMA has concerns about direct government funding where supportive political consensus is absent or fragile. In countries like Slovakia, there are indications that the shift to direct funding has increased the risk of editorial interference and weakened public trust in national broadcasters. There is a risk that without adequate legislative and regulatory protections, such models are too reliant on the behaviours and whims of governments, putting long-term sustainability at risk. Whether this model could meet the conditions PMA has set out for independence and long-term security would depend heavily on the constitutional and political safeguards in place.

- **The household fee.** Used in Austria¹⁷ and Germany¹⁸, the household fee is device-independent and ensures universality by applying to households rather than individual devices or subscriptions. In Germany, the allocation and collection process is managed independently of government through the KEF¹⁹, an independent advisory body, providing a notable degree of insulation from political interference.
- **The public media tax.** Used across Scandinavia²⁰, this model ringfences a portion of income tax for public media funding. It is progressive, collected through existing taxation infrastructure, and distributed to public media independently of the annual political budget cycle.

In the BBC's case, when considering an alternative or reformed funding mechanism, we believe it should be the government's objectives to maintain all the existing strengths of the licence fee funding model, while addressing the current shortcomings.

In the Charter Review consultation, there are suggestions of other alternative funding models, which we would like to address:

¹⁶ <https://liberal.ca/our-platform/modernizing-cbc-radio-canada/> & <https://liberal.ca/mark-carneys-liberals-to-protect-canadas-national-identity-by-strengthening-cbc-radio-canada/>

¹⁷ <https://www.obs.at/english>

¹⁸ <https://www.rundfunkbeitrag.de/welcome/english>

¹⁹ <https://kef-online.de/>

²⁰ <https://yle.fi/aihe/about-yle/finances> &

<https://www.skatteverket.se/servicelankar/otherlanguages/englishengelska/individualsandemployees/livingsweden/publicservicefee.4.676f4884175c97df4193041.html> &

<https://www.regjeringen.no/no/dokumentarkiv/regjeringen-solberg/aktuelt-regjeringen-solberg/fin/pressemeldinger/2019/finansieringen-av-nrk-legges-om/id2672152/>

- A **subscription service** would be anathema to the BBC's mission of delivering a universal service. It could lead to content curation targeting donors and subscribers, rather than the provision of accessible and universal content.
- A **hybrid advertising model** has been seen to work for public media across the world (Ireland, Canada, Belgium, the Netherlands and elsewhere), but in these places, the media landscape has developed to suit. It would be ill-fitting in the UK, where the BBC has always been excluded from this domain, and would undoubtedly cause a shock for the UK's other PSBs and media players. A reliance on advertising also risks skewing editorial and content decisions in favour of commercial gains, rather than a sole focus on public value.
- A **top-up service** could work internationally, where there is high demand for the BBC's content offering. However, we would be cautious about any such service in the UK, where it could lead to the same challenges as with the subscription service. Furthermore, without changes to ensure a permanent Charter – detailed in Chapter 2 – we fear such an offer would inspire moves towards a broader subscription model in future Charters.

We are also not opposed to reforming the licence fee, and doing so has several benefits given the collection model is already established and is familiar to UK audiences, in addition to the strengths outlined above. However, if the licence fee is to be reformed, the government should consider:

- **How can its independence be strengthened?** The government could look to create an independent body, like Germany's KEF, which sets the funding rate on an annual basis, and there is a constitutional obligation for the Ministerpräsidenten of the Bundesländer to accept.
- **Can it be made device independent?** The option to link a user's BBC iPlayer login to their licence fee is a viable suggestion, provided doing so does not create a financial burden on the BBC itself, or that funding is provided to accommodate this.
- **Should it be a more progressive model?** The flat rate ensures a universal service, and prevents preferential treatment. Would concessions for some audiences change this?
- **How can the World Service be funded that allows it to continue its essential democratic role in the future?** PMA agrees with the BBC that the World

Service should be wholly funded by the government²¹. There is further discussion of the World Service under Chapter 3.

How the BBC is funded is the most critical question for this government as part of the charter renewal process. Independence and long-term sustainability must be at the centre of any decision.

The Charter Review sets out an ambitious vision for the BBC: as a driver of economic growth, a supporter of the creative industries and minority language broadcasting, and a pillar of information integrity at home and abroad. PMA shares this vision, and we believe the BBC is well-placed to deliver on it. But we must continue to emphasise – each of these ambitions is contingent on adequate and robust funding.

Predictable, long-term funding is what allows the BBC to support jobs across the production chain, from independent producers to regional creative industries, and to act as a genuine partner in strengthening training pathways, innovation, and opportunity across the UK. It is what allows the BBC to maintain the local reporting, investigative journalism, specialist beats, and crisis coverage that information integrity depends on. And it is what makes the BBC's convening role across the sector meaningful.

Funding for the World Service deserves particular attention in this context. It is not a peripheral consideration but one that represents core elements of the BBC's universality and international reach. Funding for the World Service must be protected and wholly funded by the government, but not in a way that separates it from the BBC or its independence.

Chapter 2:

A BBC that is independently governed & securely legislated

As BBC research²² itself has indicated, there is a perception – accurate or not – that the BBC has a problem of independence from the government. This Charter should seek, in the strongest terms, to bolster that independence wherever it *can* be

²¹ <https://www.bbc.co.uk/mediacentre/2026/bbc-charter-review-green-paper-response>

²² <https://www.bbc.co.uk/news/articles/c3w9pld9g61o>

strengthened, and to address the structural conditions that give rise to these perceptions.

Creating conditions for independent funding has already been discussed above. Another opportunity in this Charter is to augment the independent governance of the BBC.

Governance structures for public media vary considerably around the world, with multiple models in use and different appointment systems. Some have a unitary authority in the shape of a board, others have a complementary advisory body such as an Audience Council, for example. Some have boards made up entirely of political appointees, others have just a few political appointees, and some use the NGO sector, unions, or the independent regulator to appoint board members.

PMA does not prescribe a single model, but our analysis of governance structures across public media worldwide informs several positions:

- **Political appointments are not inherently negative:** In a democratic society, elected representatives have a legitimate interest in the actions of the public service broadcaster, as a publicly funded institution. It is one of the main methods of holding public service media to account. But government appointments should ideally be in the minority to minimise the potential for political interference.
- **Board diversity is a strength:** Effective boards draw on a range of experience and representation. Some broadcasters ensure representation of minority groups or regions on their boards; others use unions, civil society, or academia to help appoint a diverse collective on the board and ensuring a broad array of views; while some also allow opposition parties to select a number of representatives. Diversity of this kind strengthens legitimacy and reduces the risk of any single interest dominating.
- **The board appoints the executive:** While in some countries, the government selects the Director General (or equivalent position) – and have suitable firewalls in place to ensure editorial independence – the strongest method remains putting this power in the hands of the board, to create distance from the government. However, this does add scrutiny on the composition and political makeup of the board.

PMA's assessment is that the BBC's existing governance structure – a unitary board – is broadly sound and in keeping with other well-functioning independent public service media around the world. For example, a select number (not a majority) of political representatives are on the governing boards for public media in France²³ (two sitting MPs) and Germany²⁴ (individuals appointed by federal and state governments) alongside a wider range of appointees. The direction of travel for this Charter should be to consolidate and strengthen what works, while addressing any remaining structural vulnerabilities.

The current BBC governance system²⁵ has genuine strengths: it ensures diversity across the four regions; it has staggered terms for serving members, thereby providing continuity; and government-appointed board members are a minority. These are meaningful safeguards, and they should be recognised as such.

However, as has been exposed over the previous charter period, any form of government appointment is vulnerable to a cosying up of government and public broadcaster. The risk is not always overt interference; it can be subtler, gradual erosion of the distance that independence requires.

Therefore, the Public Media Alliance welcomes this government's decision to consider how BBC governance can be enhanced. We believe the government's role in appointing board members should be further limited, and there are aspects of other governance systems around the world that should be considered when looking at the BBC's governance structure:

- **Staff & civil society representatives:** In Slovenia²⁶, after the politicisation of the RTV SLO board, reforms were undertaken to give it greater security. Its 17-member governing council is now made up of representatives from both civil society and workers unions. In Germany²⁷, 24 members of the ZDF Television Council are appointed by national NGOs. France's independent media regulator,

²³ <https://www.francetelevisions.fr/groupe/qui-sommes-nous/notre-organisation/le-conseil-dadministration-39255>

²⁴ <https://www.zdf.de/unternehmen/en/zdf-television-council-100.html>

²⁵ <https://www.bbc.com/aboutthebbc/howweare/bbcboard>

²⁶ <https://www.voanews.com/a/law-protecting-independence-of-slovenian-public-tv-to-take-effect-/7124644.html>

²⁷ <https://www.zdf.de/unternehmen/en/zdf-television-council-100.html>

ARCOM²⁸, appoints five members for France Télévisions board, while two members are staff representatives. These approaches demonstrate that broadening the base of board appointments beyond the political sphere is both workable and effective.

- **Management Foundations:** The boards of Swedish public broadcasters are appointed by the Förvaltningsstiftelsen²⁹, (the Management Foundation), as a way of creating a separation between board appointments and the government. Members of the Management Foundation are appointed by political parties, but are done so matching the composition of the Riksdag. The government selects the Chair. No current party member is allowed to be a part of the Management Foundation. This particular model is instructive of how political representation and institutional independence can be balanced through structural design rather than on good faith alone.

This Charter provides an opportunity to assess whether elements of the examples above can be integrated into the existing structure of the BBC, to improve the independence of the board appointments process, and the diversity of board representatives, away from the political sphere.

In principle, the Public Media Alliance welcomes the BBC's response to the Green Paper (page 20), suggesting that "all future Non-Executive Director (NED) appointments to the Board, including the Chair, should follow a clearly defined, transparent and broadly consistent process. This could be led by the Senior Independent Director, as a member of the BBC Board's Nominations Committee", with appropriate public scrutiny as a publicly funded institution.

The Public Media Alliance also notes and supports the BBC's preference to have a permanent charter, to prevent the cliff-edge vulnerability of the current fixed-term arrangement. Very few public service broadcasters have a legislative framework like this. While mandatory renewal does exist elsewhere – New Zealand³⁰, renewed every five years, and Sweden³¹, renewed every eight years – it is not common. A permanent charter, subject to periodic review through a defined and transparent process, would

²⁸ <https://www.francetelevisions.fr/groupe/qui-sommes-nous/notre-organisation/le-conseil-dadministration-39255>

²⁹ <https://www.forvaltningsstiftelsen.se/>

³⁰ <https://www.rnz.co.nz/about/charter>

³¹ <https://www.publicmediaalliance.org/sweden-public-service-investigation-directives-unveiled/>

give the BBC greater security against hostile governments and remove the structural leverage that renewal cycles can create.

Chapter 3:

The BBC as Critical Infrastructure

In some countries, public media have long carried the responsibility of being “Critical Infrastructure”. For RNZ³² (New Zealand) and NHK³³ (Japan), this is a statutory responsibility, while even though it is not in the ABC’s (Australia) legislation³⁴, the national public broadcaster assumes that role regardless. Traditionally, they inhabit this role primarily under the context of crisis communication: the lifeline utility function of providing essential, lifesaving information and updates during tsunamis, earthquakes, wildfires, and other national emergencies.

Critical infrastructure³⁵ refers to the systems, institutions, and services so essential to the functioning of society that their failure or compromise would have serious consequences for public safety, economic stability, democratic life, or national security. Governments may designate institutions as critical infrastructure not merely as a symbolic recognition of their importance, but because the designation carries concrete obligations. These obligations include legal protections, resourcing requirements, preparedness planning, and an expectation that the institution will remain operational under conditions of acute stress. In the media context, a public broadcaster designated as critical infrastructure is one that a nation commits to protecting, resourcing, and preparing, because its failure at a moment of crisis would leave citizens without the verified information they need to stay safe, make decisions, and maintain trust in public institutions.

To an extent, the BBC already provides aspects of this function in the UK. During major incidents, national emergencies, and periods of acute public concern, such as the COVID pandemic³⁶, the BBC is the institution the public turns to. It is, in practice,

³² <https://www.rnz.co.nz/emergency>

³³ <https://www.publicmediaalliance.org/nhks-emergency-reporting/>

³⁴ <https://www.abc.net.au/emergency>

³⁵ <https://www.publicmediaalliance.org/what-being-critical-infrastructure-means-for-public-media/>

³⁶ <https://www.bbc.co.uk/news/entertainment-arts-57564335>

critical infrastructure, regardless of whether it is recognised as such in law. This Charter is an opportunity to consider how to recognise what already exists in practice, opening opportunities for greater funding protection, without impeding on the BBC's independence or allowing avenues for undue interference from the state.

The concept of critical infrastructure for public media has expanded considerably in recent years, and this Charter should reflect that expansion. PMA believes the Charter should recognise the BBC's role within the framework of critical infrastructure on two distinct but related principles.

- 1. The fostering of a prepared and responsive public to crises, and the distribution of factual, critical and lifesaving news and information in the event of crises.**

Historically, in Europe, this role has not been so pronounced. But this is now changing as a result of the invasion of Ukraine by Russia, alongside escalating geopolitical tensions globally. This has fundamentally shifted how governments in Europe and beyond think about the role of public media in national preparedness. We believe the Charter should reflect this new attitude.

For example, legislation was updated last year to make ERR (Estonia's public broadcaster) an Operator of Essential Services³⁷. Swedish public media was given a new mandate³⁸ last year in which preparedness and national security feature prominently for the first time. In 2024, Finland's government produced a preparedness guide for citizens³⁹, which regularly cites Yle's provision of information services. These examples highlight how public media is increasingly being recognised as part of the resilience architecture of the nation and how the role as critical infrastructure is a baseline requirement for a modern public broadcaster operating in an era of heightened geopolitical risk.

There is intense focus on the experiences of Suspilne (Ukraine)⁴⁰ and how it has remained resilient in the face of the full-scale conflict, as well as RTVE (Spain)⁴¹ and

³⁷ <https://www.publicmediaalliance.org/errs-funding-crisis-how-it-became-a-victim-of-its-own-efficiency/>

³⁸ <https://swedenherald.com/article/new-public-service-law-and-guidelines-unveiled-by-government>

³⁹ <https://www.suomi.fi/guides/preparedness>

⁴⁰ <https://corp.suspilne.media/en/news/58611-rodion-kochubey-our-priorities-are-content-and-technological-upgrades/>

⁴¹ <https://tmbroadcast.com/radio-ally-spains-massive-blackout-rtve-experienced-unprecedented-day/>

3Cat (Catalonia) following the 2025 communications blackout. These cases make the argument clearly: when other systems fail, public media must be resilient.

On the note of resilience, radio consistently proves to be among the most resilient distribution channels in crisis scenarios⁴², functioning when internet infrastructure and television transmission may be compromised. The BBC's radio services (local, national and international) are a critical component of its emergency communication capacity and should be protected and resourced accordingly. The recent role of the World Service in rapidly responding to crises by providing shortwave radio services to people in Sudan⁴³, Iran⁴⁴, Russia⁴⁵, is an excellent example of this resilience.

2. Information integrity, democratic resilience, and epistemic sovereignty.

The second principle is broader, and in some respects, more urgent. The BBC operates in an information environment that is increasingly hostile, shaped by platform dynamics that reward speed and outrage over verification, exploited by state-backed actors seeking to manipulate public opinion, and undermined by the erosion of local news that has hollowed out the wider media ecosystem.

In this context, the BBC's capacity to provide trusted, verified, fact-based news and information goes beyond a public service and shifts to a democratic security function. The ability of citizens to make informed decisions, to participate in democratic life, and to resist manipulation depends in part on having access to a well-resourced, editorially independent institution whose primary obligation is to truth and the public interest. The BBC is one of the UK's most important assets to preserving epistemic security⁴⁶: the capacity of a society to maintain access to reliable information under conditions of pressure, interference, and disorder. The Charter should recognise it as such.

Critically, this function depends on independence. A BBC that is financially and structurally vulnerable to political pressure, or uncertain about its future cannot fulfil this role credibly. The independence guarantees embedded in the Charter are what make the BBC's journalism trustworthy in the first place. These guarantees must be

⁴² <https://www.ebu.ch/research/loginonly/report/radio-in-times-of-crisis>

⁴³ <https://www.bbc.co.uk/news/world-africa-65447051>

⁴⁴ <https://www.bbc.co.uk/mediacentre/2026/bbc-launches-emergency-lifeline-radio-programme-for-iran>

⁴⁵ <https://www.nytimes.com/2022/03/03/business/media/bbc-shortwave-radio-ukraine.html>

⁴⁶ <https://demos.co.uk/research/epistemic-security-2029-fortifying-the-uks-information-supply-chain-to-tackle-the-democratic-emergency/>

strengthened and improved, and any erosion of these – whether through funding mechanisms that increase government leverage, appointment processes that allow political interests to dominate, or renewal cycles that create institutional vulnerability – directly undermines the BBC’s capacity to function as a pillar of information integrity. Independence and the critical infrastructure function are therefore inseparable.

Underpinning all of this is media and information literacy. A BBC that produces trusted, verified journalism fulfils only part of its democratic function if audiences lack the skills to recognise, critically assess, and engage with that journalism. In an era of AI-generated content, algorithmic amplification of mis- and disinformation, and declining news literacy across generations, building a media-literate public is in itself an act of democratic resilience. PMA believes the BBC’s Public Purpose should be explicitly expanded to include contributing to fostering a media and information literate society. This would recognise that the BBC’s responsibility is not only to produce trusted information, but to equip audiences to engage with it critically. Editorial explainers and factchecking content via BBC Verify as well as BBC Bitesize, already contribute significantly to these efforts.

This responsibility extends beyond the UK’s borders. The BBC World Service reaches audiences in some of the world’s most information-restricted environments, providing trusted journalism where state-controlled or commercially compromised media dominate. The scale of this reach is significant; the World Service reaches an average of 418 million people every week⁴⁷. In Iran, where BBC Persian’s reporting is banned and audiences face considerable personal risk in accessing it, BBC News Persian nevertheless reaches one in four Iranian adults.⁴⁸ These figures speak not only to the BBC’s reach, but to the depth of the democratic need it is meeting. At moments of acute political crisis, audiences in some of the world’s most information-restricted environments turn to the World Service precisely because they trust it and because they have nowhere else to turn.

PMA’s position is therefore that World Service funding should be treated as a matter of strategic national importance rather than being managed as a discretionary budget line. The World Service’s value extends beyond its role as an instrument of soft power

⁴⁷ <https://committees.parliament.uk/publications/50165/documents/270705/default/>

⁴⁸ <https://www.bbc.co.uk/mediacentre/2026/bbc-launches-emergency-lifeline-radio-programme-for-iran>

or foreign policy. It is a pillar of global information integrity, and its funding should reflect that broader mandate rather than being contingent on any single government department's priorities. There must be complete and robust government funding of the World Service.

More broadly, the BBC's role as critical infrastructure – in crisis preparedness, democratic resilience, and epistemic sovereignty at home and abroad – must be adequately and securely funded.

Chapter 4:

An accountable BBC

Accountability to the public as their primary stakeholder is a fundamental value of public service media.

There is an opportunity within this Charter to strengthen the requirements on the BBC to remain directly accountable to the public, and in this final chapter, we highlight initiatives in use around the world that seek to advance this mission.

It is firstly important to recognise some of the ways in which the BBC is already held accountable to the public, for example:

- **Via the Board:** The governance system as currently established and in use at other public broadcasters internationally sees political appointees placed in positions of oversight, although there are clear challenges with this model, as per Chapter 2.
- **Via parliamentary scrutiny and independent regulators:** Ofcom monitors the BBC's impact and performance according to its operating licence, and BBC Executives and Board members appear at, and report to, committees of the UK parliament.
- **Via complaints processes and Ofcom:** Audiences can register any complaint they may have about BBC broadcast or online content. Every complaint is responded to by the BBC, and there are further opportunities to escalate the complaint to Ofcom.

- **Via BBC journalism and programming:** The BBC newsroom and its journalists repeatedly demonstrate their ability to hold power to account, including within its own organisation, with no fear or favour. The BBC as a current affairs topic is regularly the subject of phone-in shows, for example, while regular programmes such as *Feedback* also allow the regular airing of diverse opinion by members of the public.
- **Via the Charter Renewal process:** A legislative requirement to update the charter gives a decennial opportunity for the public to have their say in the future direction, purpose and mission of the BBC.

Collectively, these varied methods of accountability ensure that members of the public can contribute to the national discussion about the BBC. However, it must be recognised that the BBC also suffers from the growing phenomenon of waning trust in public institutions and declining trust in legacy (sometimes referred to as editorial) media. Challenges of media literacy and a lack of understanding of BBC editorial processes and structure has also contributed to increasing disillusionment of the purpose of the BBC. Making these more accessible and understandable would help to improve the situation.

The Public Media Alliance is pleased to see the Green Paper recognise the Charter Renewal as a chance to increase the BBC's transparency and accountability measures. While this is beyond the remit of the Charter, ensuring that existing accountability measures are visible, accessible and prominent for audiences can build recognition of the various ways in which members of the public can have their say.

Other methods of demonstrating accountability from other public service media organisations include:

- **Direct engagement:** Many public media host in-person events countrywide. When CBC/Radio-Canada was developing its first National Indigenous Strategy⁴⁹, staff spent months travelling around Canada to dialogue with First Nations, Inuit and Métis to ensure they could contribute to the strategy and the vision. SVT (Sweden) hosts regular coffee breaks with the Swedish public, called

⁴⁹ <https://cbc.radio-canada.ca/en/impact-and-accountability/equity-diversity-and-inclusion/edi-archives/indigenous-community-engagement>

Fika med SVT.⁵⁰ VRT (Belgium) took a caravan across Flanders⁵¹ and would decamp in town centres and invite people to have their say on the public broadcaster. Creating spaces and giving time for audiences and members of the public to contribute is an effective way of demonstrating accountability, while also giving the public a sense of ownership and direct contact with the broadcaster. By going to public spaces, it also allows public media to hear from people who might not otherwise contribute via regular procedures. The BBC's 'News For All' project, as part of its R&D team, also seeks to hear from underrepresented and minority audiences.⁵²

- **Via an Audience Council:** Some public service broadcasters have a secondary, governance body. These bodies often hold more of an advisory role but still give an opportunity for members of the public to have a role in the direction and decisions made by the corporation and also ensure those in positions of power are held to account. France Télévisions has a Programme Advisory Council which meets annually.⁵³ Thai PBS has a 50-member Audience Council⁵⁴ constituted of people from all walks and life, who serve voluntarily a two-year term. They collect feedback and suggestions from audiences to then make proposals to improve the services and programming of Thai PBS.
- **Ombudsmen:** Some public broadcasters have used an 'Ombudsman'-like role to provide greater guarantees that complaints processes will be handled transparently and independently. NPR (US) has a collaboration with the nonprofit Poynter Institute to employ a Public Editor⁵⁵ whose role is to be the public's representative within the public broadcaster, who publishes a regular blog. In 2022, the ABC established the Ombudsman's Office⁵⁶ to handle all complaints, following an investigation into how the public broadcaster dealt with feedback.

These initiatives are worth considering in light of how the BBC can demonstrate more fully its accountability to the public, and provide institutional and programming

⁵⁰ https://www.svt.se/nyheter/om/_fikamedSVT

⁵¹ <https://www.publicmediaalliance.org/your-vrt-a-new-way-of-engaging-with-audiences/>

⁵² <https://www.bbc.co.uk/rdnewslabs/news/news-for-all>

⁵³ <https://www.francetelevisions.fr/et-vous/a-votre-ecoute/le-ccp/le-conseil-consultatif-des-programmes-29880>

⁵⁴ <https://en.thaipbs.or.th/aboutus/philosophy>

⁵⁵ <https://www.npr.org/sections/publiceditor/>

⁵⁶ <https://www.abc.net.au/about/ombudsman>

guarantees that it listens to the public, and has mechanisms in place to provide evidence. Yet ultimately, accountability can only be fully ensured when robust protections for sustainable and viable public funding and independence are ensured for the long term.

In summary

The BBC stands at a consequential moment. The decisions made in this Charter will shape not only the public broadcaster's future but the health of the wider information environment, in the UK and beyond. Our submission is grounded in the single overarching belief that the BBC's ability to fulfil its public service mission – in all the ways this Charter envisions – is contingent on the strength of the foundations beneath it.

In summary, the Public Media Alliance makes its case on the following points:

1. **Funding** is the linchpin. The governance reforms, accountability mechanisms, and democratic functions we call for are only meaningful if the BBC is adequately and independently resourced to deliver on them. Any funding settlement must be protected from government interference, provide long-term security, guard against real-terms erosion, and maintain a direct link between the BBC and the public it serves. PMA does not advocate for a single model, but any alternative to the licence fee must be assessed against these conditions without exception. PMA does not support advertising or a subscription model to fund the BBC. Additionally, we agree with the BBC's position that the World Service requires separate, long-term and stable funding, and we call for its funding to be returned in full to the UK government with steadfast commitments to its independence.
2. The BBC's **governance** must be strengthened to reduce the scope for political influence, with the government's role in appointing board members being further limited. A permanent Charter, subject to periodic review through a defined and transparent process, would further insulate the BBC from the structural and political vulnerability that fixed renewal cycles create.

3. The BBC's role as **critical infrastructure** should be recognised. This is relevant for crisis preparedness and emergency communication, information integrity and democratic resilience, and for epistemic sovereignty at home and abroad. Notably, this recognition must be accompanied by the funding, independence guarantees, and preparedness obligations that make it meaningful in practice, including an expansion of the BBC's Public Purposes to include fostering a media and information literate society.
4. The BBC's **accountability** to the public it serves must be strengthened in ways that deepen legitimacy without exposing editorial or organisational decisions to political interference. Transparency and accessibility of any new or existing accountability mechanisms are a foundation of public trust, and this Charter should ensure they are visible, prominent, well-resourced, and genuinely usable by the audiences the BBC exists to serve.

PMA welcomes this Charter Review as an opportunity to renew and strengthen one of the world's most important and recognisable public service media institutions. We urge the government to match the ambition of that opportunity with a funding and governance settlement equal to it.