

BBC Charter Review Consultation

Dear VLV members and friends of public service media,

The government is about to make some of the most important decisions affecting the future of the BBC and its role for the next generation. We strongly urge you to take part in the public consultation on the future of the BBC, which closes on 10 March 2026 at 11.59pm.

YOUR VOICE COUNTS

The government is keen to hear from a wide range of organisations and individuals, not just experts in media policy. We encourage you to respond in your own name or on behalf of your organisation, as named submissions are likely to carry greater weight.

The consultation consists of 32 questions, but your response does not need to be technical or lengthy. You do not have to answer every question if time is limited. We have prepared a crib sheet, which we hope will guide you through the process and direct you to further background reading. We recommend that you use your own words. While the government may discount identical submissions, responses that address similar issues using different evidence and perspectives will be taken seriously.

💡 If you don't have time to respond to all the questions, from our point of view the priority ones to answer are Questions 8, 11,13,16,18, 25, 27 and 32 which cover public accountability, transparency and independence from government, sustainable funding and the BBC World Service.

We also encourage you to explore the resources available on our partner websites, many of which provide excellent research and information to support your response. These links are provided at the end of the document.


The consultation form can be found [here](#).

If you prefer, you can email your response to: bbccharterreview@dcms.gov.uk

We are very happy to help people with their responses. Please do contact us on info@vlv.org.uk

We have highlighted our suggested answer to each question and made suggestions as to which boxes to tick in each case.

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

 **VLV Recommended Response:** We suggest ticking “Disagree - The BBC’s Mission and Public Purposes should change”


- Agree - The BBC’s Mission and Public Purposes should remain the same
- **Disagree - The BBC’s Mission and Public Purposes should change**
- Unsure or no opinion

You can read the BBC’s current Mission and Public Purposes [here](#).

While the BBC’s Mission – “to act in the public interest, serving all audiences through the provision of impartial, high-quality and distinctive output and services which inform, educate and entertain” – is broadly the same as it has been for decades, the current Public Purposes were introduced in the last Charter. They replaced the Public Purposes in the 2007 Charter which, though similar, were much shorter: usually one sentence each, as opposed to a paragraph each in the current Charter. The trend over time, then, is towards governments giving the BBC longer and more detailed Public Purposes. However, the current Charter also dropped a Purpose in the [2007 Charter](#) requiring the BBC to help “deliver to the public the benefit of emerging communications technologies and services”.¹ In the Green Paper, the government indicates it is considering a number of changes to the Public Purposes.

With increased competition from global providers, it is getting harder for the UK’s commercial public service broadcasters (PSBs) – ITV, Channel 4 and Channel 5 – to survive and we have seen a gradual reduction in their remits over the past two decades. This means that the BBC is the only remaining PSB in the UK with a wide-ranging remit to serve all the UK with a diversity of content.

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

 **VLV Recommended Response:** We suggest ticking “Disagree - A Public Purpose aiming to support the growth of the creative economy should probably not be added”.

- Strongly agree - A Public Purpose aiming to support the growth of the creative economy should definitely be added.


¹ Department for Culture, Media and Sport, [Royal Charter for the continuance of the British Broadcasting Corporation](#), October 2006, p. 3

- Agree - A Public Purpose aiming to support the growth of the creative economy should probably be added.
- Neither agree nor disagree - No opinion either way.
- **Disagree - A Public Purpose aiming to support the growth of the creative economy should probably not be added.**
- Strongly disagree - A Public Purpose aiming to support the growth of the creative economy should definitely not be added.
- Unsure

The Green Paper shows the government is considering adding a Public Purpose to the Charter “focused on driving economic growth, to emphasise the importance of the BBC using its scale, reach and influence to address the challenges facing the creative economy across the UK.”²

Currently, the BBC’s fourth Public Purpose requires it to “support the creative economy across the United Kingdom” in the course of reflecting, representing and serving “the diverse communities of all of the United Kingdom’s nations and regions”.³ We think this kind of language strikes the right balance: while it is good the BBC aims to support the UK’s creative economy in the course of fulfilling its mission, that goal ought to be one subsidiary to its primary mission. Existing research demonstrates the BBC already makes a significant contribution to the UK’s creative economy.⁴ Giving the BBC a specific purpose to ‘drive economic growth’ could lead to an over-emphasis on commercial objectives that risks drawing the BBC away from its core public service mission, which is a civic, cultural and educational one not pursued by the commercial sector, and which the commercial PSBs have been less and less able to fulfil in recent years, as Ofcom has shown.

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

 **VLV Recommended Response:** *We suggest ticking – “The BBC should do more to represent all audiences. The BBC should provide more content and services aiming to represent all audiences”.*

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

² Department for Culture, Media and Sport, [Britain’s Story: The Next Chapter – BBC Royal Charter Review Green Paper and Public Consultation](#), December 2025, p. 52


³ BBC, [“Mission, values and public purposes”](#)

⁴ Mariana Mazzucato, Rowan Conway, Eleonora Maria Mazzoli, Eva Knoll and Sarah Albala, [Creating and measuring dynamic public value at the BBC: A scoping report](#), December 2020

- The BBC is doing the right amount to represent all audiences. Currently, enough is being done to ensure all audiences are represented. The BBC should continue to provide content and services aiming to represent all audiences.
- The BBC is not doing enough to represent all audiences, but no further action should be taken. Currently, not enough is being done to ensure all audiences are represented. However, there are other areas the BBC should focus on instead of providing more content and services aiming to represent all audiences.
- The BBC does too much to represent all audiences. The BBC should provide less content and fewer services aiming to represent all audiences.
- No opinion either way
- Unsure

The available research suggests that some demographics are less likely to use the BBC, such as younger people, people from less well-off socio-economic backgrounds, and people from minority ethnic groups.⁵ However, when asked whether the BBC reflects the lives of people like them, people from minority ethnic groups are now more likely to say yes than people who are white, but people from well-off socio-economic groups and people with disabilities are both less likely than others to say yes.⁶ There is also research suggesting that the BBC, and other PSBs, are prioritising universal reach over representing all audiences and offering a wide range of genres because of the competition from global streamers.⁷ This reflects the fact that the decline of linear TV viewing and rise of streaming is seeing the UK broadcasters lose an increasing share of younger audiences' viewing time to subscription video-on-demand (SVOD) services like Netflix, Amazon Prime Video and Disney+, and to video-sharing platforms (VSPs) like YouTube and TikTok.

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

 **VLV Recommended Response:** *We suggest ticking all the options offered.*

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

⁵ Ofcom, [Ofcom Annual Report on the BBC 2024-2025](#), 28 November 2025, p. 33

⁶ Ofcom, [Ofcom Annual Report on the BBC 2024-2025](#), p. 39

⁷ Gareth Benest, Christopher Birchall, Catherine Johnson and Anna Theodoulides, [Behind the Screen: How streaming is changing public service media](#), July 2025

- **Improving on and off-screen diversity**
- **Other, please specify [Free text box; 50 words]**
- **No changes are necessary**
- **Unsure or no opinion**

The BBC is the only broadcaster in the UK now providing certain public service genres (such as religious, science, arts and children’s programming) to any significant extent.⁸ What distinguishes content in these genres is, first, that their audiences are typically more niche, or more nationally or culturally specific, than content in other genres with more general or cross-market appeal; second, that they are typically more expensive programmes to make for a host of reasons (for example, requiring more intensive research, expertise or skilled labour to create); third, that they are programmes that have a range of valuable social effects (for example, educating viewers or promoting community cohesion) over and above the viewing they generate; fourth, that by being addressed to current events or to issues specific to Britain, their appeal to viewers expires more quickly and is more geographically limited than, say, a scripted drama set in a fantasy world.

If the BBC stops producing such public service content, it is unlikely to be produced by the commercial PSBs because these genres are much less commercially viable for the reasons just set out. Beyond the risks to the public’s access to information and education as well as entertainment, failing to protect the BBC’s provision of these genres also has a potential knock-on effect on the UK’s production ecology and particularly the smaller independent production companies that tend to produce specialist programmes.

There have been improvements in regional representation and production because of existing legislation and PSB remits, such as out-of-London production quotas. These have had significant financial benefits for regional economies.⁹ However, production is still disproportionately based in the south-east of England and in London. It is, therefore, important to maintain out-of-London production quotas to ensure that these benefits continue.

While there have been improvements in the diversity of the workforce in the TV and radio industry, more work is needed, particularly in senior roles and for disabled and/or working-class employees. This limits opportunities to work in the creative industries and can affect whose stories get represented.¹⁰

The BBC’s ability to produce content in less commercial genres, or that brings people together in shared national moments, is fundamentally determined by the level of its funding. Its remit to be a universal broadcaster that serves all audiences means it must protect spending on programmes that reach broader audiences. When its funding is cut,

⁸ Gareth Benest, Christopher Birchall, Catherine Johnson and Anna Theodoulides, *Behind the Screen: How streaming is changing public service media*


⁹ O&O, [Understanding the UK’s TV Production Sector](#), August 2023

¹⁰ Ofcom, [Equity, Diversity and Inclusion in Broadcasting: 2024/25](#), 28 November 2025

as it has been in real terms repeatedly since 2010, more niche programmes and services serving smaller audiences will always be at greater risk. Meanwhile, content that brings large audiences together while fulfilling the BBC’s Mission is often very expensive to produce, especially given the rapid rate of cost inflation in the most popular genres like premium drama. The government must therefore address and improve the BBC’s future funding in order to strengthen its ability to engage and represent all audiences and to bring people together in shared national moments.

Chapter 1: A trusted institution

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

 **VLV Recommended Response:** *We suggest ticking “Disagree - New requirements on the BBC to improve workplace standards should probably not be introduced”.*

- Strongly agree - New requirements on the BBC to improve workplace standards should definitely be introduced.
- Agree - New requirements on the BBC to improve workplace standards should probably be introduced.
- Neither agree nor disagree - No opinion either way.
- **Disagree - New requirements on the BBC to improve workplace standards should probably not be introduced.**
- Strongly disagree - New requirements on the BBC to improve workplace standards should definitely not be introduced.
- Unsure

There is substantial evidence of persistent problems in workplace culture across the UK screen industries, including long working hours, job insecurity, freelance precarity, and barriers to progression for women, minoritised workers, disabled workers, and those from working-class backgrounds.¹¹ These issues contribute to poor retention, uneven access to opportunity, and the loss of skills from the sector over time.

As a major public service institution, the BBC has a responsibility to model good practice and has already taken steps to address workplace standards through internal policies, commissioning guidelines, and industry partnerships. However, views may differ on whether additional formal requirements are the most effective way to improve working conditions. Some argue that clearer obligations would strengthen accountability and


¹¹ Heather Carey, Lesley Giles and Dave O’Brien, [Job quality in the Creative Industries: The final report from the Creative PEC’s Good Work Review](#), Creative Industries Policy & Evidence Centre, February 2023

raise standards across the wider production ecology, particularly through the BBC's commissioning power. Others caution that overly prescriptive requirements risk becoming procedural or compliance-focused, without addressing deeper structural issues associated with freelance labour markets and power imbalances in commissioning.

An alternative or complementary approach would be to focus on consistent enforcement of existing standards, greater transparency, and the strategic use of commissioning leverage to promote fair work practices across the supply chain.


Question 6. How, if at all, does the amount those working for the BBC are paid impact your view of the BBC?

When responding, you may wish to consider how much it impacts your trust in the BBC's outputs and whether it affects how much you engage with BBC services. [200-word open box]

 **VLV Recommended Response:** *There is no evidence identifying a correlation between on-screen salaries and public trust.*

It is unclear what the aim of the question is. Perhaps there is some intention to introduce caps on senior pay. While there are plenty of headlines about pay at the BBC, it is worth bearing in mind that the BBC tends to pay its executives less than its commercial competitors. This is not the case for PSBs in some other European countries.

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

 **VLV Recommended Response:** *We suggest ticking "Agree - The BBC is mostly accountable to the public".*


- Strongly agree - The BBC is almost always accountable to the public.
- **Agree - The BBC is mostly accountable to the public.**
- Neither agree nor disagree - No opinion either way.
- Disagree - The BBC is rarely accountable to the public.
- Strongly disagree - The BBC is almost never accountable to the public.
- Unsure

At the moment, the BBC's accountability to the public is secured primarily through its accountability to the government and Parliament. However, it is self-evident that the

interests of the government and of political parties are not the same in all areas as those of the public, most obviously in the area of the BBC's role in political scrutiny. In recent decades, attempts by governments to use their powers over the BBC's funding, senior appointments and Royal Charter have at times threatened to compromise the BBC's independence. The BBC's own recent survey of its audience, "Our BBC, Our Future," found that while 91% of respondents said it was important for the BBC to be independent of the government of the day, only 43% thought it was effective at being so.¹² It is therefore essential that more direct routes of accountability between the BBC and the public are established. However, the ways in which the BBC meaningfully engages directly with the public are fairly limited. At present, there is a tendency to rely on polls and focus groups commissioned by the BBC. These are forms of engagement which allow for the topics of discussion to be framed and circumscribed by the BBC itself, rather than directed by the public and its priorities.

There are legitimate concerns that increased public accountability could leave the BBC open to capture from campaigns coordinated by those who wish to see its demise. However, properly organised and regulated public accountability is not difficult to achieve and could increase trust in the BBC. Certain principles are important. Public engagement should be: (1) meaningful (addressing public priorities and concerns), (2) inclusive (reaching different groups, including those who tend to be under-represented), (3) well informed (participants should have access to quality information and opportunities to ask questions and reflect on different viewpoints) and (4) consequential (ensuring public contributions are considered and responded to by decision makers).¹³ Deliberative processes such as citizens' assemblies, in which diverse groups of participants are given the knowledge and time to discuss issues and make informed inputs, have been tested and are effective.¹⁴

Question 8. Which of the following options aiming to enhance the BBC's accountability, if any, do you support? (Please select all that apply)

 **VLV Recommended Response:** We suggest ticking all the options except "Strengthening the external scrutiny of the BBC" and use the "Other" box to insert words to the effect of "Setting up an independent body to set the amount of the BBC licence fee (or other funding mechanism) to remove political interference in the financial sustainability of the BBC".

¹² BBC, ["Our BBC, Our Future: Areas that need to be addressed"](#)

¹³ Lee Edwards and Giles Moss, ["Consultation design and evaluation toolkit"](#), May 2020;

Lee Edwards and Giles Moss, ["Democratising Media Policymaking: A Stakeholder-Centric, Systemic Approach to Copyright Consultation"](#). *Media, Culture & Society* Vol. 44, No. 3, p. 514–31 (2021)


¹⁴ For an example, see Lee Edwards and Giles Moss, ["Debating the Future of Public Service Broadcasting: Recommendations of an Online Citizens' Assembly – Summary Report for Ofcom"](#), 1 December 2020

- Requiring the BBC to use consultative forums, such as citizens' assemblies, so that decision-making represents the public's views and voices
- Requiring the BBC to hear regional perspectives through new consultative frameworks or other structures, representing each of the UK's nations and/or regions
- Enhancing how the BBC conducts audience research to help inform decision making
- Strengthening requirements of the Board to ensure the BBC engages with the public in a meaningful way
- Changing the structure of the Board to enhance its effectiveness and accountability
- Changing the Board's appointment process, this could include reducing the government's role in board appointments to appointing the Chair only
- Clarifying the roles and responsibilities of board members, this could include setting out duties for the Chair
- Enhancing the role of the independent board members and their ability to hold the BBC to account
- Strengthening the external scrutiny of the BBC, this could include, for example, greater oversight by Ofcom or Parliament
- **Other (please specify) - [free text]- *Setting up an independent body to set the amount of the BBC licence fee (or other funding mechanism) to remove political interference in the financial sustainability of the BBC.***
- No changes are necessary
- Unsure or no opinion

There are several options for governance reform. Using consultative forums and deliberative processes, such as citizens' assemblies, could increase the BBC's direct accountability to the public. The BBC's Public Purposes could be amended to include a requirement to engage in a range of specified forms of direct public engagement, including the ones just mentioned.

At the same time, removing or reducing government control over the BBC is just as important. The government's role in BBC Board appointments could be restricted to just appointing the Chair, as the government seems to be considering, but it could just as easily be removed entirely and the role of appointing members to the boards of the BBC, Channel 4 and Ofcom be given either to the Public Appointments Commissioner (PAC), or to a specific Media Appointments Panel itself appointed by the PAC, following the example of the panel that appoints the Press Recognition Panel.


Question 9. The government is considering targeted changes to increase transparency in the BBC to enhance BBC accountability over the next Charter period. Which options, if any, do you support? (Please select all that apply)

 **VLV Recommended Response:** *We suggest ticking “Improving the way the BBC communicates important information, so it is clear, concise and able to be understood by everyone” and use the “Other” box inserting words to the effect of: “Requiring the BBC to communicate more information on its use of AI and algorithms”.*

- **Improving the way the BBC communicates important information so it is clear, concise and able to be understood by everyone**
- Requiring the BBC to communicate important information better to industry stakeholders, particularly to other UK broadcasters
- Requiring the BBC to communicate more information about its complaints process, particularly to those who submit complaints
- Requiring the BBC to communicate more information about the process for selecting which programmes should be made and broadcast
- Requiring the BBC to communicate more information about its editorial decisions
- **Other, please specify [free text limited to 200 words] – Requiring the BBC to communicate more information its use of AI and algorithms**
- No changes are necessary
- Unsure or no opinion

It is important to remember that all the above changes will cost the BBC money, so there is a balance to be found between accountability and over-management. The key question to ask is whether the communication of this information will best serve the public interest. It is becoming harder for civil society organisations to hold the BBC to account, now that content is increasingly delivered online and via personalised services. Communication about its editorial decisions and use of AI/algorithms, therefore, becomes more important.¹⁵ Requiring the BBC to communicate more about the programmes its selects could undermine its editorial independence.

Question 10. Why, if at all, does the BBC’s independence matter to you? (Please select all that apply)

 **VLV Recommended Response:** *We suggest ticking all the options offered and using the “Other” box.*

¹⁵ Gareth Benest, Christopher Birchall, Catherine Johnson and Anna Theodoulides, *Behind the Screen: How streaming is changing public service media*


- It allows the BBC to be free from government or political influence in the content it releases
- It allows the BBC to be impartial when reporting on elections, government policies, and political parties
- It allows the BBC to hold government to account and/or be critical of government
- It allows the BBC to be editorially independent and make the final call on what stories to cover and how to cover them
- It allows the BBC to pursue its own agenda, without interference, so it can provide content that serves audiences across the UK
- Other, please specify [Free text]
- The BBC's independence does not matter to me
- Unsure or no opinion

Broadcasting was developed in the UK (and elsewhere) as a public service because of the power that emanates from the ability to broadcast simultaneously to millions of people. This power was seen as too important to be in the hands of government, big business or individuals. The BBC was set up as a regulated, yet independent and publicly accountable, public service broadcaster to ensure that the power of broadcasting was used responsibly.

All of the reasons set out above are part of why the BBC's independence matters. The BBC's 'Our BBC, Our Future' survey found that 91% of respondents agreed that it was important for the BBC to be 'independent from the government of the day', indicating that an understanding of the importance of BBC independence from government or political influence in the content releases is widespread among the public.¹⁶ But it is also important to underscore that BBC independence matters not only in relation to the BBC's news, current affairs and other content that directly touches on political subjects, like elections, government policies and political parties, but across all BBC output. It is vital for the BBC's ability to take creative risks, including the risk of offending some sensibilities by addressing controversial subjects or giving a platform to controversial perspectives.

Question 11. What measures to increase the BBC's independence from government, if any, should be prioritised to support greater trust in, and engagement with, the BBC? In your response you may wish to explain your reasoning and provide relevant evidence.

- [Free text limited to 200 words]
- Unsure or no opinion

 **VLV Suggested Points:** *The BBC's independence has always been qualified by three enduring forms of government power over the Corporation: first, government control of*

¹⁶ BBC, "Our BBC, Our Future: Areas that need to be addressed"

senior BBC appointments: second, government control over the vast majority of BBC funding through its power to periodically set the level of the TV Licence fee; third, government control over the BBC’s remit, structure and regulation – primarily through the periodic requirement for renewal of its Royal Charter.


This is why an agenda to enhance the BBC’s independence must look at establishing the BBC on a statutory basis (like Channel 4) and removing or at least heavily qualifying the government’s power over licence fee funding. However, the government has ruled out both of these options in the Green Paper. It says it sees “no benefit to moving to a model that puts the BBC under a statutory footing like Channel 4,” yet there is the obvious and important benefit that a statutory footing would mean that future changes to the BBC’s remit, structure and regulation would have to pass the normal processes of open, Parliamentary democratic approval, rather than being decided by the Privy Council – in practice, the Cabinet. Likewise, the Green Paper declares that the government “continue[s] to support multi-year funding settlements decided by the government,” although it is considering “how the decision making process could be reformed to increase transparency and support the BBC’s independence.”

An agenda for enhancing the BBC’s independence would need to include removing government control over BBC board appointments, increasing algorithmic transparency, increasing public engagement through citizen assemblies, establishing an independent body to set the level of licence fee funding, and replacing the BBC’s Royal Charter with a statutory basis for the Corporation.

Creating an independent body that determines the level of the licence fee (or other funding mechanism) would help to remove government interference in the financial sustainability of the BBC. This is important because funding cuts (or threats of funding cuts) to public service broadcasters are one of the most important ways that governments can exercise political power over them. A more independently appointed Board may still fear offending government, and therefore lack independence in its actions, if government retains the power to cut funding. Finally, removing mid-Charter reviews and providing the BBC with a permanent statutory basis, which could include a requirement for periodic reviews every decade, would help increase the BBC’s security of footing and reduce opportunities for government interference.

Chapter 2: Delivering services for the public good


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

 **VLV Recommended Response:** We suggest ticking all options.

- Transparently explaining its own use of AI, for example, in the creation of content and services
- Having new requirements (for example, transparency obligations), to set the ethical standards for AI's use in public service media organisations
- Teaching audiences how to recognise where AI has been used, and to critically assess the reliability of information and content
- Helping audiences to use AI themselves, for example, teaching them basic prompting skills
- Find innovative uses of AI to drive efficiencies within the BBC and in the wider media sector
- Act as a bridge between AI companies and smaller public service media who have less time and money to negotiate, helping to support wider collaboration
- Other, please specify [free text limited to 200 words]
- The new Charter should not introduce obligations around AI for the BBC
- Unsure or no opinion

AI is already being used by the BBC and so the BBC has a potentially important role as a market leader in responsible uses of AI. Transparency ensures accountability to the public. The BBC has published principles about how they will use AI¹⁷ and have undertaken work on AI literacy.¹⁸ These could be formalised in its Charter, although it is important to have a balance to ensure that regulation protects the public interest while not stifling innovation and for any changes to be flexible enough to adapt to a fast-changing market. Incentivising the BBC to innovate in the public interest is one option. The BBC also has a role to play in educating the public about uses of AI, potentially as part of a wider Purpose to promote media literacy.

Question 13. What kind of programming, if any, do you think the BBC should make more visible on its platforms? (Please select all that apply)

 **VLV Recommended Response:** We suggest using the “Other” box rather than ticking specific genres and focusing your answer on encouraging the BBC to increase diversity by using a range of discoverability strategies.

- News and current affairs programming
- Arts, religious and international affairs programming (sometimes referred to as ‘underserved’ genres)
- Children’s and educational programming
- Programming showing different voices and perspectives from across the UK
- Locally relevant programming
- **Other, please specify [free text limited to 200 words]**

¹⁷ BBC, [“BBC AI Principles”](#)

¹⁸ BBC, [“How to get started with AI chatbots”](#)


- The new Charter should not require the BBC to make specific types of programmes more visible
- Unsure or no opinion

All of the above genres are important. Rather than focusing on prioritising specific genres, the BBC should be encouraged to ensure that viewers are made aware of and encounter a wide range of programmes (including across all of the above areas) through a range of discoverability strategies, such as algorithmic personalisation, human curation, trailers before and recommendations after programmes, clearer categorisation on its online services, and effective search.

Focusing on visibility overlooks the range of different ways in which people might encounter new programmes on the BBC's platforms.¹⁹ Focusing on one or two specific genres may not be effective in actually broadening people's viewing as users develop default habits when navigating interfaces.²⁰ Encouraging the BBC to increase diversity by using a range of discoverability strategies is likely to be more effective in increasing people's access to a range of different kinds of programmes and allows the BBC to experiment and adopt the strategies that are most effective.

Focusing on visibility also overlooks the fact that the BBC's ability to produce programmes in some of these genres is becoming increasingly compromised by the scale of real-terms cuts to BBC funding since 2010. It is easier to make more popular and widely seen programming in 'underserved' and less commercial genres if (a) there is more of it, and (b) more money can be spent on making it to the highest standards.

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

 **VLV Recommended Response:** We suggest ticking "Agree - The BBC should probably make greater use of third-party platforms to share its content" with caveats outlined below and use the free text box in Question 15.

- Strongly agree - The BBC should definitely make greater use of third-party platforms to share its content
- **Agree - The BBC should probably make greater use of third-party platforms to share its content**
- Neither agree nor disagree - No opinion either way
- Disagree - The BBC should not make greater use of third-party platforms to share its content

¹⁹ Gareth Benest, Christopher Birchall, Catherine Johnson and Anna Theodoulides, *Behind the Screen: How streaming is changing public service media*

²⁰ Catherine Johnson, Ramon Lobato and Alexa Scarlata, "[Default viewing: Reconceptualising choice and habit in television audience research](#)". *Media, Culture and Society* Vol. 47 No. 5, p. 893-909 (2025)

- Strongly disagree - The BBC should definitely not make greater use of third-party platforms to share its content
- Unsure

This is a difficult question because there are several barriers to using third party platforms to distribute content. Without regulatory intervention, requiring the BBC to make greater use of third party platforms to share its content could lead to a reduction in the quality of the BBC's offer.²¹ However, for many younger audiences, third party platforms (e.g. video-sharing platforms like YouTube and TikTok) are their primary source of media and increasing the amount of high quality public service content made available on those platforms could have wider social benefits, particularly for younger people. Most third-party video platforms serve users with ads, which potentially erodes the expectation that UK audiences encounter BBC content ad-free.

²¹ Catherine Johnson et al., [Public Service Media in the Age of Platforms: Challenges and Recommendations for the Future](#), September 2025

Question 15. Reflecting on your response above, please explain why you agree or disagree that the BBC should make greater use of third party platforms to share its content. Please provide relevant evidence, where possible. [Free text limited to 200 words]

💡 VLV Recommended Response: *To fulfil its mandate to serve all audiences groups it is becoming increasingly important for the BBC to engage with social media and video-sharing platforms like YouTube. Use of video sharing platforms is increasing for all demographics. 16–24-year-olds spent 45% of their in-home viewing on video-sharing platforms and only 19% of their in-home viewing watching broadcaster content (on broadcast or on-demand TV) in 2024. Meanwhile, over half of all adults used social media as a source of news. Ensuring that more news content on social media comes from trustworthy and regulated sources has significant societal benefits.*

However, video-sharing and social media platforms function as gatekeepers to the content they distribute, with opaque rules, shifting policies and little accountability. There is a lack of transparency regarding content visibility, so content can become less visible without explanation or recourse, limiting the reach of PSB content on these platforms. The commercial business models of platforms have led to the amplification of harmful or misleading content through opaque and unregulated algorithms. For PSBs content to reach audiences on these platforms, they may need to adopt content strategies that go against their public service values. Platforms share minimal data, reducing the ability of PSBs to develop the kinds of data-informed content strategies which provide a competitive advantage in the industry today.

Making PSBs dependent on these platforms to reach certain audiences comes with significant risk to the social and democratic function of public service media. Regulation of platforms would be needed to address these challenges.

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

💡 VLV Recommended Response: *We suggest ticking “Other” and making the points made below regarding direct accountability to the public – not via government or Parliament.*

- A renewed focus on accuracy and impartiality
- More clearly marking when content is news versus where it is opinion
- Robust and transparent editorial guidelines applied consistently

- Greater explanation of the editorial and journalistic decisions taken when reporting the news
- Greater transparency when mistakes and errors are made
- More effort to be made in taking into account the public's views in its news coverage
- Reporting more news stories which are local to you
- Reporting more international news stories
- Highlighting stories which are not reported by other outlets
- **Other, please specify [free text limited to 200 words]**
- No changes are necessary
- Unsure or no opinion

The Green Paper shows the government is thinking about the question of how to improve BBC news and current affairs in the wrong way. It is not for the government to make these kinds of decisions for the BBC. What would improve the value of BBC news and current affairs output is, first, greater independence from government, by making BBC journalists, editors and producers more able to report and edit with autonomy from political interference or pressure, and second, more, and more secure, public funding. This would improve the BBC's ability to produce more high-quality journalism, in a range of formats, on a range of topics, across a range of platforms and providing a range of perspectives that ensures all sides of the political debate are fairly represented.

Successive licence fee settlements have imposed major real-terms cuts on the BBC which have forced it to make repeated cuts to its news and current affairs division (among others) over the last decade and a half, leading to the decision to merge BBC News 24 with BBC World News, the cancellation of award-winning programmes like The Victoria Derbyshire Show, major budget cuts at flagship news programmes like Newsnight, and round after round of redundancies. BBC journalists would be more able to do their jobs well – to provide high-quality, impartial journalism reported without fear or favour – when they are not at constant risk of losing them, or faced with shrinking resources.

Direct accountability to the public – not via government or Parliament – would help ensure that BBC output is oriented towards the public's needs and interests without the risk of politicians playing an undue role. In areas of journalism which require specialist expertise – like science and environment coverage – the BBC should also seek to establish forms of regular accountability to and engagement with communities with such expertise, e.g. academic scientists.

Question 17. Thinking about the next Charter period, what role, if any, do you think the BBC should have in ensuring UK citizens can recognise and access trusted and accurate information? Please provide any relevant evidence to support your response.

[200-word text box]

VLV Recommended Response: We suggest a free text answer outlining the points below why the BBC contributes so fundamentally to a healthy democratic discourse in the UK.

The BBC remains the most trusted news institution in the UK.²² Highly-trusted PSM news brands correlate with a better national media landscape and are associated with lower concern about misinformation, lower perception of news polarisation and lower levels of news avoidance.²³ The BBC's primary role should be through the provision of high-quality, impartial and trusted news and current affairs content freely available to all UK audiences. As a common news source accessed by the majority of the British public, the BBC's existence helps prevent the kind of partisan balkanisation of news consumption that has played a role in enabling the creation and circulation of disinformation in other countries, such as the United States.²⁴

There are some great initiatives in other countries where PSBs take an active role in helping people access and recognise trusted and accurate information. One example is the Flemish public service broadcaster VRT's Instagram account NWS, NWS, NWS, which shares news stories in a social media native form and engages with all comments, including sharing sources and information when comments post mis or disinformation. However, this one service has a staff of 30 people and its visibility depends on Instagram's algorithm, so undertaking this kind of work is resource intensive with positive impacts limited because of a lack of platform regulation.


One area where the BBC could do more is in helping audiences to assess the accuracy and reliability of other media sources, including by making programmes and services that promote a critical understanding of media sources and processes of media production, and by producing output that challenges and exposes media sources that are untrustworthy or have a record of frequent inaccuracy.

²² Ofcom, *Ofcom Annual Report on the BBC 2024-2025*

²³ European Broadcasting Union, [Public Service Media 360 Value](#), December 2025. See also, Toril Aalberg and James Curran (eds.), *How Media Inform Democracy: A Comparative Approach* (Routledge 2012); Stephen Cushion, *The Democratic Value of News: Why Public Service Media Matter* (Palgrave Macmillan 2017).

²⁴ Yochai Benkler, Robert Faris and Hal Roberts, *Network Propaganda: Manipulation, Disinformation, and Radicalization in American Politics* (Oxford University Press 2018)

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


 **VLV Recommended Response:** *We suggest ticking “Strongly Agree - The BBC should continue to provide this role internationally”.*

- **Strongly agree - The BBC must continue to provide this role internationally.**
- Agree - The BBC should continue to provide this role internationally.
- Neither agree nor disagree - No opinion either way.
- Disagree - The BBC should not continue to provide this role internationally.
- Strongly Disagree - The BBC must not continue to provide this role internationally.
- Unsure

There is research that indicates that the BBC World Service is one of the UK’s strongest soft power assets.²⁵ With the rise of mis- and dis-information, polarisation and populism globally, there is more need than ever for the accurate, impartial and fair reporting provided by the BBC World Service. However, the grant-in-aid provided for the World Service by the Foreign Office was cut entirely in 2010 and, though partially restored since then, remains considerably below where it was in 2010 in real terms. The BBC now provides part of the World Service’s budget out of its own funding, but the overall result has been cuts to both the World Service and other BBC services to make up some of the funding lost. At a time when some other states are increasing what they spend on their national broadcasters in a bid to increase their global influence, British governments have been undermining a key source of Britain’s soft power, in spite of the BBC’s Public Purpose to “reflect the United Kingdom, its culture and values to the world” including by providing “high-quality news coverage to international audiences.”²⁶

Chapter 3: Driving growth across the UK

Question 19. What, if anything, do you value about the BBC being UK-wide? (Please select all that apply)

 **VLV Recommended Response:** *We suggest ticking all the options and using the “Other” box to make a point about universally accessibility of BBC services.*


²⁵ Giles Winn, *Global Reach, National Impact: The soft power impact of the BBC World Service to the UK*, UCL Institute for Global Prosperity, 2025

²⁶ BBC, [“Mission, values and public purposes”](#)

- **Bringing people together from different communities across the UK, including its nations and regions**
- **Representing people from across the UK**
- **Telling local stories to a national audience**
- **Providing local news and information**
- **Money spent in local areas**
- **Stimulating local creative clusters (e.g. MediaCity in Greater Manchester, BBC's new headquarters in the West Midlands), including through supporting the independent production sector.**
- **Jobs and skills development for local people**
- **Other, please specify [free text limited to 200 words]**
- None of the above
- Unsure

Universality has been a key tenet of public service broadcasting since its inception over 100 years ago. It ensures that everyone – regardless of where they live, or how much they earn – is able to benefit from the high-quality information, education and entertainment provided by PSBs that supports democracy and civil society. However, the rise of global platforms and streaming services has challenged the universality of PSBs, as audiences have fragmented and younger viewers, in particular, spend less time with PSBs. The proliferation of subscription options online has inevitably generated increasing inequalities in access to audio-visual culture. This arguably makes the universality the BBC provides more important than ever as it increases the need to ensure that everyone has access to socially and culturally beneficial programmes, and that some programmes continue to form the basis of a common national culture and common public debate.²⁷

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

 **VLV Recommended Response:** *We suggest ticking the option – “Agree - The BBC should probably do more to spread its spending, activities and decision making across nations and regions of the UK”.*


- Strongly agree - The BBC should definitely do more to spread its spending, activities and decision making across nations and regions of the UK.
- **Agree - The BBC should probably do more to spread its spending, activities and decision making across nations and regions of the UK.**
- Neither agree nor disagree - No opinion either way.
- Disagree - The BBC should probably not do more to spread its spending, activities and decision making across nations and regions of the UK.

²⁷ Dan Martin and Catherine Johnson, [“Universality: A Battleground for Public Service Media in the Platform Age”](#), *The Political Quarterly*, 3 May 2024

- Strongly disagree - The BBC should definitely not do more to spread its spending, activities and decision making across nations and regions of the UK.
- Unsure

There is strong evidence to demonstrate the economic benefits of the BBC’s activities outside of London, such as in Salford and Cardiff.²⁸ It has also created jobs in the TV industry for those outside of the south-east of England. The BBC is the largest PSB spender in the nations and regions. However, TV and radio production is still disproportionately based in the south-east, and the share of production budgets spent outside of London fell in 2024.²⁹ This minimises opportunities for those from other regions to gain work in these areas and have their experiences represented on screen. Requiring the BBC to do more to spread its spending, activities and decision making across the nations and regions would have a significant impact in addressing this challenge and have wider economic benefits for the UK’s nations and regions.

Question 20. (2) Which option(s), if any, would you support for spreading the BBC’s economic impact and role supporting the production sector across the UK nations and regions? (Please select all that apply).

 **VLV Recommended Response:** *We suggest ticking the options: “Governance changes to give regional or local leads for commissioning content more control over their budget and decision-making,” and “Changing the rules so location is factored into decision-making around commissioning content from independent production companies”.*


- Requiring the BBC to develop long-term strategies for regional creative sector development
- Further quotas or obligations for producing content outside London and the M25
- New quota targets for basing staff involved in commissioning content across the UK nations and regions
- **Governance changes to give regional or local leads for commissioning content more control over their budget and decision-making**
- **Changing the rules so location is factored into decision-making around commissioning content from independent production companies**
- Other: please specify
- None of the above
- Unsure or no opinion

²⁸ KPMG, [An Assessment of the Economic Impact of the BBC: A report for the BBC for Financial Year 2019/20](#), March 2021; O&O, [Understanding the UK’s TV Production Sector](#), August 2023

²⁹ Pact, [Pact Census 2025: Nations and Regions Annex](#), 10 September 2025

Although production has moved away from London, commissioning is still disproportionately based there, which means that the decisions about which stories are told are made by those without the lived experience and connections to the grass roots creativity across the UK. While production quotas are a useful mechanism, they do not address these barriers in commissioning.

Question 21. What, if anything, do you think the BBC could do to fill skills gaps in the creative sector? Please provide any relevant evidence, where possible.

 **VLV Recommended Response:** We would suggest a free text response outlining some of the points below with the emphasis that the BBC cannot develop long term sector interventions without secure and sustainable funding at an appropriate level.

- [Free-text box; 200 words]
- Unsure or no opinion

There is extensive evidence that skills gaps in the UK creative sector are not primarily caused by a lack of entry-level talent, but by problems of retention, progression and sustainability, particularly for those from working-class backgrounds, disabled workers, carers, and those based outside London.³⁰ Short-term contracts, unpaid development labour, informal recruitment, and long working hours contribute to high attrition, meaning that skills are repeatedly lost from the sector.³¹

The BBC already plays an important role in skills development through apprenticeships, trainee schemes, and partnerships with independent producers.³² However, its impact could be strengthened by shifting emphasis from short-term entry initiatives towards longer-term workforce development, including clearer progression pathways, more consistent employment practices, and support for mid-career retention.

As the largest public service broadcaster, the BBC is well placed to act as a system leader, setting standards that shape the wider production ecology. This could include embedding fair work principles in commissioning, supporting skills development across the supply chain (particularly SMEs and regional indies), and working more closely with universities, FE colleges, and devolved bodies to align training with realistic career pathways.

³⁰ Lesley Giles, Heather Carey and Dave O'Brien, [Skills Mismatches in the UK's Creative Industries](#), Creative Industries Policy and Evidence Centre, February 2025

³¹ Orian Brook, Giuliana Giuliani, Dave O'Brien and Mark Taylor, ["Precarity and second job-holding in the creative economy"](#), *Cultural Trends* (2025)

³² Lesley Giles and Heather Carey, [Creative Industries Employers' Perspectives on Skills Initiatives: 2025](#), Creative Industries Policy and Evidence Centre, July 2025

Question 22. If you represent an organisation that has worked with the BBC in the past, please share your reflections and provide evidence on your experience of how your partnership has worked and how it could be improved. You may wish to consider how you aligned vision and goals for the partnership, trust, communication, transparency, decision-making, or other aspects of partnership working.

- What went well? [Free-text box; 350 words]
 - What could be improved? [Free-text box; 350 words]
-

Question 23. If you are responding on behalf of an organisation with an interest in R&D (e.g. a production company, university, a technology hardware company), how would you like to see the BBC supporting innovation? Please provide relevant evidence, where possible. In your answer, you may wish to consider any specific areas where you think it should focus its leadership; what point of the R&D lifecycle is the BBC's support most valuable; and how would you like the BBC to partner with organisations like yours in R&D.


- [Free-text box; 350 words]
 - Unsure or no opinion
-

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

- What went well? [Free-text box; 350 words]
 - What could be improved? [Free-text box; 350 words]
-

Chapter 4: Sustainable and fair funding

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

 **VLV Recommended Response:** *We suggest ticking the option “Strongly agree - The licence fee should definitely fund a wide range of services and output that aim to inform, educate, and entertain”.*


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

- Agree - The licence fee should fund a wide range of services and output that aim to inform, educate, and entertain.
- Neither agree nor disagree - No opinion either way.
- Disagree - The licence fee should not fund a wide range of services and output that aims to inform, educate, and entertain.
- Strongly disagree - The licence fee should definitely not fund a wide range of services and output that aims to inform, educate, and entertain.
- Unsure

Inform, educate and entertain has been the basis of public service broadcasting since its inception. Maintaining a broad remit recognises that informing, educating and entertaining are not mutually exclusive. Entertainment content can be a highly effective way of supporting the BBC's civic function. The fact the BBC makes popular, entertaining programmes has historically been central to its ability to also expose audiences to the new, the unfamiliar, the challenging and the educational.

This question appears to be to understand what appetite there is for using the licence fee only to fund a narrower subset of the BBC's output, with the rest potentially funded by advertising or subscription. However, it has been framed in a way to encourage respondents to reject that idea.

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

 **VLV Recommended Response:** *We suggest ticking the option "Strongly agree - The BBC should definitely use the licence fee to fund a broad range of benefits to the UK and the creative economy".*

- **Strongly agree - The BBC should definitely use the licence fee to fund a broad range of benefits to the UK and the creative economy.**
- Agree - The BBC should use the licence fee to fund a broad range of benefits to the UK and the creative economy.
- Neither agree nor disagree - No opinion either way.
- Disagree - The BBC should not use the licence fee to fund a broad range of benefits to the UK and the creative economy.
- Strongly disagree - The BBC should definitely not use the licence fee to fund a broad range of benefits to the UK and the creative economy.
- Unsure

This question appears to be in order to gauge whether people think the BBC's licence fee funding should be tied to wider objectives than the fulfilment of its core remit for programmes and services. It may reflect a desire on the part of the government to remind

respondents that the licence fee delivers this wider range of benefits besides funding for BBC programmes and services, and to encourage responses in effect endorsing what the BBC is already doing.

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

VLV Recommended Response: We suggest ticking the option “Strongly agree - The licence fee should definitely be reformed to support the BBC’s long term sustainability”. Then you should use Question 32 to give your views on the BBC’s funding model – we provide more detail at that question.

- **Strongly agree - The licence fee should definitely be reformed to support the BBC’s long term sustainability.**
- Agree - The licence fee should be reformed to support the BBC’s long term sustainability.
- Neither agree nor disagree - No opinion either way.
- Disagree - The licence fee should not be reformed to support the BBC’s long term sustainability.
- Strongly disagree - The licence fee should definitely not be reformed to support the BBC’s long term sustainability.
- Unsure

*There have been a number of studies setting out different options for the funding of the BBC.*³³

At present, people are only required to pay the licence fee if they watch live TV and/or use BBC iPlayer. This is anomalous in two ways. First, it means that people who engage with BBC content (such as via the BBC news website or app, or BBC radio) do not pay the licence fee. As the viewing of live broadcast TV declines, more and more people will no longer be required to pay the licence fee even if they regularly use BBC services. Therefore, the current licence fee model is unlikely to be sustainable in the long term.


Second, it differs from the ways in which other public services are paid for, in that you only pay if you directly use (some) of the BBC’s services. Other public services (such as education and health) are paid for by all regardless of use because they are valued as important for wider society. We all benefit from a society that is well-educated and

³³ House of Commons Digital, Culture, Media and Sport Committee, [The future of public service broadcasting – Sixth Report of Session 2019–21](#), 17 March 2021; House of Lords Communications and Digital Committee, [Licence to change: BBC future funding – 1st Report of Session 2022-23](#), 18 July 2022

healthy. Similarly, with public service media, the entire country benefits from public service broadcasting, which provides the knowledge base necessary for an informed

democratic society and offers widespread access to a range of culture. There is evidence that well-funded public service broadcasting reduces polarisation and increases trust.³⁴ This is more important now than ever.

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

 **VLV Recommended Response:** We suggest ticking the option “No advertising - The BBC should not carry any advertising on its content and services”.

- Extensive advertising - The BBC should carry advertising on all of its content and services, including live TV and radio.
- Limited advertising - The BBC should carry limited advertising on some of its online content and services, but not on live TV or radio.
- **No advertising - The BBC should not carry any advertising on its content and services.**
- Neither agree nor disagree - No opinion either way.
- Unsure

There are two broad reasons why the BBC should not carry advertising. The first is financial. The UK’s broadcast advertising market has been declining for some time and the UK’s commercial public service broadcasters (ITV, Channel 4 and Channel 5) are struggling with ad revenue.³⁵ The online advertising market is far more competitive, is dominated by UK tech giants (Google and Meta), and returns less revenue to broadcasters because there are more intermediaries.³⁶ If the BBC were to carry advertising this would significantly impact the business model of the UK’s commercial broadcasters (as well as other commercial broadcasters in the UK) and would be unlikely to deliver significant revenues to the BBC.

The second reason that the BBC should not carry advertising relates to its impact on the BBC’s public purposes. Advertising-funded television effectively sells people to advertisers. As a consequence, programming must be produced that attracts the audiences that advertisers want to advertise to. These tend to be younger demographics and those on higher incomes. This pulls against the fundamental principle that the BBC


³⁴ European Broadcasting Union, *Public Service Media 360 Value*, December 2025

³⁵ Ofcom, [“The TV Advertising Sector: Discussion Paper”](#), 5 February 2025

³⁶ Jonathan Davies and Lydia Harriss, [“Online advertising technology and competition”](#), UK Parliament POST, POSTnote 705, 4 October 2023

should serve all the UK. Combined, these two consequences of advertising have seen ITV and Channel 4 reduce their PSB remits. It will be very challenging for the BBC to maintain its current public purposes if it were also seeking to generate advertising funding to offset reductions in and/or removal of the licence.

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

 **VLV Recommended Response:** We suggest ticking the option “Strongly disagree - I would definitely not be willing to pay for a BBC top-up subscription service focused on premium and entertainment content”.


- Strongly agree - I would definitely be willing to pay for a BBC top-up subscription service focused on premium and entertainment content.
- Agree - I would be willing to pay for a BBC top-up subscription service focused on premium and entertainment content.
- Neither agree nor disagree - No opinion either way.
- Disagree - I would not be willing to pay for a BBC top-up subscription service focused on premium and entertainment content.
- **Strongly disagree - I would definitely not be willing to pay for a BBC top-up subscription service focused on premium and entertainment content.**
- Unsure

A top-up subscription option for funding the BBC fundamentally goes against the principles of universality that have underpinned public service broadcasting for over 100 years. All public services should be universally available because they provide services that support all of society. For PSB, this extends beyond news and minority/niche content and includes high-quality drama and entertainment that can play an important role in exploring issues of social importance. Introducing a top-up subscription for certain premium content makes this content only available for those who are able to pay, creating a two-tier PSB system. In addition, a two-tier system removes one of the key benefits of a mixed-programme approach to PSB, which is that more popular premium and entertainment content can be used to encourage viewing of other forms of programming – such as documentaries, current affairs, science, history, arts and news. Introducing a top-up subscription also alters the relationship between the BBC and its viewers. The BBC will be incentivised to focus content spend on premium and entertainment content that attracts subscribers, rather than on a wide range of content that serves the needs of all audiences, regardless of their ability to pay. This funding model would prioritise the needs of wealthier audiences able to pay, over those on lower incomes. It also privileges programme genres that are effective in attracting new subscribers, and which retain their value in the service’s catalogue for longer, over other

genres that do not: films and premium drama over news and current affairs programmes, for example. As a result, no major streaming service provides any news content.

Finally, it is highly unlikely that this funding model will generate significant revenues for the BBC. Subscription video-on-demand services depend on vast catalogues of content with regular releases that ensure that there is enough content to keep subscribers returning each month.³⁷ This proposed option would restrict the BBC to making only a small part of its catalogue available behind a paywall, which would make it far less financially attractive to audiences and not particularly financially viable. The UK's commercial public service broadcasters have not generated significant revenues from their top-up premium subscription services,³⁸ and the major SVOD services that do offer vast catalogues of content, have all introduced ad-funded tiers because they were struggling to generate enough revenue from subscription funding alone in an increasingly competitive marketplace.

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

 **VLV Recommended Response:** *We suggest ticking the option “Agree - The government should introduce new TV licence concessions for households facing significant financial pressures only if there are no negative impacts on the BBC or higher costs for other households”.*

- Strongly agree - The government should definitely introduce new TV licence concessions for households facing significant financial pressures, even if other households have to pay more or the quality of BBC services is reduced.
- **Agree - The government should introduce new TV licence concessions for households facing significant financial pressures only if there are no negative impacts on the BBC or higher costs for other households.**
- Neither agree nor disagree - No opinion either way.
- Disagree - The government should not introduce new TV licence concessions for households facing significant financial pressures.
- Strongly disagree - The government should definitely not introduce new TV licence concessions for households facing significant financial pressures.
- Unsure


There is a strong argument for introducing concessions for households on lower incomes, making the licence fee more progressive. This would ensure continued access to high-quality PSB even for those less able to pay. However, the BBC is facing increased

³⁷ See Amanda D. Lotz, [Portals: A Treatise on Internet-Distributed Television](#) (Michigan Publishing 2017), chapter 2, “[A Model For the Production of Culture: The Subscriber Model](#)”

³⁸ For example, in 2024, ITV generated £48m in subscription revenues from the premium version of its video-on-demand service ITVX, compared to £1,820m in advertising revenue. See ITV, “[ITV Plc 2024 Full Year Results](#)”, 6 March 2025

costs – from rising production costs (driven up by the global streamers), to increased innovation costs (in having to develop and maintain on-demand services like iPlayer), to increased distribution costs (having to pay to distribution content on digital terrestrial broadcast services and on-demand via the internet).³⁹ Any new funding mechanism needs to ensure that the BBC’s income does not go down, particularly given that its income has reduced by 40% since 2010.⁴⁰ Expanding who is required to pay the licence fee to address the rising number of households declaring ‘no licence needed’ could help offset the introduction of new concessions.

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

 **VLV Recommended Response:** We suggest ticking “Disagree - Technology should definitely not be used to support compliance, for example the BBC iPlayer login system should not require households using the service to enter details from their TV licence”.

- Strongly agree - Technology should definitely be used to support compliance, for example the BBC iPlayer login system should definitely require households using the service to enter details from their TV licence.
- Agree - Technology should be used to support compliance, for example the BBC iPlayer login system should require households using the service to enter details from their TV licence.
- Neither agree nor disagree - No opinion either way.
- **Disagree - Technology should definitely not be used to support compliance, for example the BBC iPlayer login system should not require households using the service to enter details from their TV licence.**
- Strongly disagree - Technology should definitely not be used to support compliance, for example the BBC iPlayer login system should definitely not require households using the service to enter details from their TV licence.
- Unsure

Technology could be used to ensure compliance, but it would be better if the licence fee was not attached to the use of the iPlayer (see question 27). One risk with requiring audiences to enter details from their TV licence is that older audiences and those with disabilities already struggle with sign-in. Introducing additional logins to access iPlayer (and other BBC services) could further reduce the accessibility of the BBC for these audiences. Any introduction of sign-in related to the licence fee to access BBC services needs to be designed to ensure accessibility for all.

³⁹ Catherine Johnson et al., *Public Service Media in the Age of Platforms: Challenges and Recommendations for the Future*, September 2025; O&O, *Understanding the UK’s TV Production Sector*, August 2023

⁴⁰ VLV, [“Summary: VLV Report into BBC Public Funding”](#), 6 November 2024

Question 32. Do you have any other views on the BBC’s funding model that you wish to share? In your response, you may wish to explain why you agree or disagree with the potential changes above or suggest a different funding model.

💡 VLV Recommended Response: *VLV believes that the future funding of the BBC is the most important issue on which government must decide in this period of charter review. There is an increasingly broad consensus that the current funding model is unsustainable: the outgoing Director General of the BBC has said the BBC will be “in trouble” and faces “profound jeopardy” unless there is reform of the licence fee. The Culture Secretary has called the current form of the licence fee “unenforceable”. Both are right.*

Although the government appears to have ruled out the option of a Household Levy, VLV believes that making the obligation to pay the Licence Fee a universal one regardless of device or service use is effectively the same mechanism. This is an option that needs proper open debate and discussion and is the most practicable answer to a long-term sustainable BBC and solution to licence fee evasion. We believe it is this is an important place to make your point about this and we give some guidance below.

- [Free-text box]

This box is also an opportunity to expand on and beyond key points related to the questions about funding above. Points to consider are:

VLV believes that the future funding of the BBC is the most important issue on which government must decide in this period of charter review. There is an increasingly broad consensus that the current funding model is unsustainable: the outgoing Director General of the BBC has said the BBC will be “in trouble” and faces “profound jeopardy” unless there is reform of the licence fee. The Culture Secretary has called the current form of the licence fee “unenforceable”. Both are right.

In our view, the solution is to make the obligation to pay the Licence Fee a universal one, payable by all households regardless of device or service use, while exempting the households least able to pay from the requirement. This would make Licence Fee enforcement much simpler and more effective because (a) it would no longer be necessary to prove device use – something which has become increasingly difficult as households have become able to access licensable content without needing an TV aerial external to the premises. And (b) enforcement would be free to focus on households that are genuinely evading the licence requirement, not on ones too poor to be able to pay. This would also help address the disproportionate number of women currently prosecuted for licence fee evasion. The shift towards a universal Licence Fee requirement would enable the BBC to remain a universal service for all audiences, whereas subscription and advertising would generate a pervasive and unacceptable bias towards the most commercially lucrative audiences – usually the most affluent.

Subscription has the further flaw that it would end the universal availability of BBC services: those too poor to pay the Licence Fee would most likely also be too poor to afford a subscription BBC. Our proposal ensures everyone remains able to access all BBC services, regardless of ability to pay. This universality is, along with its public service remit, one of the two most fundamental features of the BBC, and must be protected.

At the same time, severing the connection with device use and making the Licence Fee a universal obligation is, even with the social exemption proposed, likely to increase the overall number of licences sold and reverse the ongoing decline in Licence sales, guaranteeing the BBC growing future income even without real-terms increases in the level of the Licence Fee. In addition, though, the responsibility for recommending the level of the Licence Fee should be given to a new Public Media Commission (see answer 11), whose recommendation could build on information from the BBC and others enabling it to make reasonably reliable projections of future funding needs. The government could be required to accept the PMC's recommendation, unless Parliament votes to reject it. This would give the BBC the security, stability and independence from the threat of future political interference it needs to fulfil its remit.

VLV also believes that the World Service should return to being fully funded by central government, not partly through Licence Fee revenue, which should be used exclusively for the benefit of the UK audiences who pay it. Using the Licence Fee to fund the World Service, which primarily serves international audiences, reduces the resources available for domestic services and undermines the BBC's ability to meet its obligations to UK licence payers. More broadly, we think the principle should be re-established that the Licence Fee should fund the BBC exclusively, and not be top-sliced to pay for other government projects that ought to be paid for out of the government's budget, which in the past have included local TV, rural broadband rollout and the Young Audiences Content Fund (YACF)⁴¹.

Resources on Charter Review and Links to our Partners

[British Broadcasting Challenge](#)
[Decentered Media](#)
[International Broadcasting Trust](#)
[Media North](#)
[Media Reform Coalition](#)
[Public Interest News Foundation](#)
[Roger Bolton's Beeb Watch](#)
[The Sandford St Martin Trust](#)

⁴¹ Whilst VLV wholeheartedly supports the principle of a dedicated fund for the development and production of UK Children's content we believe it should be financed through means other than licence fee income <https://vlv.org.uk/wp-content/uploads/VLV-Submission-to-CMS-childrens-TV-inquiry-final-11.09.25.pdf>