

**Written evidence submitted by Better Media to the House of Commons Culture, Media and Sport Committee - BBC Charter Review**

[Better Media: https://bettermedia.uk](https://bettermedia.uk)

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Better Media is an independent policy and advocacy organisation that works to promote a more plural, open and democratically accountable media system in the United Kingdom. It supports media structures that strengthen civic participation, local democratic life and public trust, while challenging excessive concentration of power in dominant institutions, platforms and regulatory arrangements.

Better Media argues for communications policy that enables independent, community and public-interest media organisations to flourish on fair terms, with access to open standards, proportionate regulation and sustainable routes to development. Its purpose is to ensure that media policy serves the public good by widening participation, protecting plurality, and supporting communication systems that are responsive to citizens rather than insulated from them.

## **1 BBC Charter Renewal**

Better Media welcomes the opportunity to submit evidence to the Committee's review of the BBC Royal Charter. This submission addresses the BBC's future purpose, funding, accountability, relationship to democratic oversight, and place within the wider public service media ecology. It proceeds from a simple constitutional proposition. The BBC should remain institutionally independent, but it should not be treated as sovereign. It is a major public institution created through democratic authority and sustained through public policy. It is therefore not above democratic review, parliamentary scrutiny, or periodic constitutional reconsideration.

Better Media does not support a permanent Charter. The case for permanence mistakes institutional stability for constitutional immunity. In a media environment shaped by technological change, platform concentration, shifts in public expectations, and changing patterns of civic participation, it would be neither prudent nor democratic to place the BBC on an effectively permanent constitutional footing. The BBC should have security sufficient to plan and invest, but not such insulation that it comes to be regarded as detached from the democratic process.

For that reason, Better Media would accept a longer Charter period than at present, potentially extending to fifteen years, if such an extension were coupled with firm and visible mechanisms of democratic oversight. A longer Charter may offer greater operational stability and reduce the disruption of repeated short-cycle constitutional debate. However, any extension must be balanced by the clear principle that Parliament retains an essential role in scrutiny, public accountability, and periodic review. A fifteen-year period could be workable. A permanent settlement should not be.

## **2 The BBC Should Be Independent, But Not Sovereign**

The distinction between independence and sovereignty is central to this submission. Better Media supports the editorial and operational independence of the BBC from day-to-day political management. That independence remains an essential condition for trusted journalism, cultural confidence, and institutional integrity. However, independence must not be recast as sovereign authority. The BBC is not a state within the state. It does not stand above democratic institutions, nor should it be permitted to claim constitutional exceptionalism that limits the ability of Parliament or the public to examine its purpose, scale, obligations, and conduct.

Too often, debates about BBC reform become polarised between those who would weaken the BBC through political pressure and those who imply that meaningful scrutiny is itself a threat to independence. Better Media rejects both approaches. The proper settlement is one in which the BBC is protected from improper interference while remaining answerable, in principle and in practice, to democratic institutions. Parliamentary oversight remains essential precisely because the BBC exercises substantial influence over public communication, news priorities, distribution systems, cultural commissioning, and the wider media market.

The BBC should therefore be regarded as an independent public institution operating under democratic authority. It should not be treated as a sovereign body whose constitutional position must be protected from review. The Charter should affirm that independence exists to serve the public interest, not to displace it. This means that parliamentary scrutiny is not an unfortunate external pressure on the BBC. It is one of the legitimate means by which the democratic public maintains oversight over a major publicly sanctioned institution.

### **3 Better Media Opposes a Permanent Charter**

Better Media is opposed to a permanent Charter because permanence would weaken the constitutional discipline that periodic review imposes. The BBC's purposes, methods and scale are not fixed for all time. They are historically contingent and should remain open to democratic reassessment. A permanent Charter would encourage the view that the BBC has a settled, quasi-sovereign constitutional status, with review reduced to managerial discussion rather than public judgment. That would be a mistake.

Periodic Charter renewal is one of the few moments when Parliament and the public can revisit first principles. Those moments allow the country to ask what the BBC is for, how it should be funded, what obligations it owes to other public-interest media, and whether its structure still fits the wider communications environment. Removing or neutralising that process would not depoliticise the BBC. It would merely entrench existing power arrangements and narrow the legitimate space for democratic argument.

A permanent Charter would also be poorly suited to the pace of structural change in media systems. The transition from legacy broadcasting to mixed digital distribution, the growing power of global platforms, the challenge of discoverability, the role of artificial intelligence in media production, and the fragility of local and independent journalism all require adaptable public policy. It is difficult to see why such a fluid environment would justify granting permanent constitutional insulation to one legacy institution. Stability is desirable. Permanence is not.

### **4 A Longer Charter Period May Be Acceptable If Democratic Oversight Is Strengthened**

Although Better Media opposes a permanent Charter, it recognises that a somewhat longer Charter period may be justified. The present cycle can produce uncertainty and political theatre that distracts from thoughtful strategic planning. A longer period, potentially fifteen years, could permit the BBC to invest with greater confidence, develop longer-term infrastructure, and avoid excessive short-termism. In that limited sense, extension may be beneficial.

However, any extension must be matched by stronger forms of oversight during the Charter term. A fifteen-year Charter should not be interpreted as a fifteen-year holiday from democratic scrutiny. Parliament should retain structured review points, whether at five-year intervals or through a formal mid-term review. Those reviews should examine not only finances and audience figures, but also the BBC's contribution to plurality, its impact on market access for

smaller providers, its support for civic information, its stewardship of public assets, and its compliance with obligations to transparency and openness. This should not simply be left to Ofcom to periodically review.

The principle is clear. The longer the Charter period, the more deliberate the arrangements for democratic oversight must become. Extension is only defensible if it is accompanied by explicit, durable and intelligible scrutiny mechanisms. Better Media would therefore support a fifteen-year Charter only on the basis that parliamentary oversight remains active, visible and consequential throughout the life of the Charter.

## **5 There Should Be Recognition Of The Right Not To Support The BBC And No Compulsion To Pay**

Better Media maintains that the future funding settlement should recognise the right not to support the BBC financially. There should be no compulsion to pay. This principle follows from the wider constitutional argument above. If the BBC is not sovereign, it cannot rely indefinitely on inherited assumptions of compulsory support merely because it has long occupied a privileged position in national life. Public legitimacy requires consent.

This does not require hostility to the BBC. It requires recognition that support for the BBC should be grounded in public confidence and democratic choice rather than compulsion. A future settlement should therefore move away from funding models that assume mandatory payment as the default condition of citizenship. If public money is used for core public-interest functions, the basis for that support should be openly justified, tightly defined and democratically reviewable. Optional or quasi-commercial services should not be bundled into a presumption of compulsory household payment.

The argument here is not purely financial. It is constitutional and civic. The right not to support the BBC financially is part of a wider requirement to prevent the BBC being treated as an unquestionable national obligation. In a plural media system, public purpose should be possible through multiple institutional forms. The state should not require all citizens to underwrite a single dominant institution without providing meaningful room for refusal, alternatives, or competing public-interest models.

## **6 Public Purpose Should Not Be Monopolised Through BBC Infrastructure**

Better Media argues that business and communications policy should support the capacity of people to establish their own independent media organisations, free of BBC infrastructure but able to deliver public purpose objectives. This is one of the most important reforms that Charter renewal should help unlock. Public purpose must not be defined in a way that assumes dependence on BBC platforms, BBC partnerships, BBC commissioning structures, or BBC-branded routes to legitimacy.

The UK needs a wider civic communications ecology in which local publishers, co-operatives, social enterprises, independent studios, digital-first public-interest outlets, neighbourhood audio services, and other small or medium-sized providers can emerge and survive on their own terms. They should be able to pursue local journalism, cultural programming, educational content, democratic reporting and civic storytelling without having to position themselves as peripheral extensions of the BBC system.

This means that Charter renewal should be aligned with wider public purpose related communications and industrial policy. Barriers to entry should be lowered. Shared technical standards should be opened. Distribution arrangements should be fair. Discoverability on connected devices and digital interfaces should not favour only the largest incumbents. Investment and support structures should recognise that public purpose can be delivered by multiple independent organisations, not only by the BBC and those brought into orbit around it.

Such a shift would strengthen democratic resilience. A system with many independent centres of public-interest communication is more robust than one that relies excessively on a single large institution. It would also help address public concern about distance, centralisation and cultural concentration. A genuinely plural settlement would allow communities and independent organisers to build their own durable media institutions while still contributing to national civic objectives.

## **7 BBC Data Should Be Treated As Part Of An Open-Data Commons**

Better Media further submits that the data generated by the BBC should be understood, wherever possible by default, as part of an open-data commons that can be used by other independent and community media providers. Publicly generated metadata, catalogues, technical standards, non-personal audience information at suitable levels of aggregation, scheduling data, archive description systems, and other comparable informational resources should not

be reserved solely for the strategic advantage of the BBC. Where privacy, security and legitimate editorial concerns permit, there should be a presumption of openness.

The reason is straightforward. If public authority and public support have helped create an informational resource of broad civic utility, then that resource should contribute to the wider public communications ecology. Independent and community providers often lack the scale to build comparable systems. Opening appropriate datasets and standards would lower costs, foster innovation, improve interoperability, and support new forms of public-interest service beyond incumbent institutions.

This open-data commons approach should extend beyond narrow technical disclosure. It should encourage the BBC to act as a steward of shared public communications infrastructure rather than as the exclusive owner of publicly generated informational advantages. That would not diminish the BBC's importance. It would align the institution more closely with the principle that public value is enlarged when common resources can be reused for civic ends by a wider range of actors.

## **8 The BBC Should Reduce Its Dependence On Serving The Global Market**

Better Media is concerned by the degree to which the BBC's future may be framed around competition in the global market. The BBC should reduce its dependence on serving the global market. Commercial activity may supplement the institution, but it should not become an organising logic that reshapes domestic priorities, commissioning values, or distribution strategy. A BBC increasingly driven by export considerations risks becoming less attentive to local democratic needs, regional responsiveness and the cultivation of a genuinely plural media settlement within the UK.

Global market incentives favour scale, premium formats, brand extension and content strategies designed for international competition. Those pressures may be understandable in commercial terms, but they can distort the domestic public role of the BBC. They can draw attention away from local journalism, civic information, small-scale experimentation, and partnership models that strengthen media plurality inside the UK. If the BBC is to justify any continuing public privilege, it should do so primarily through service to domestic democratic and cultural life, not through global commercial ambition.

Reducing dependence on global markets does not mean withdrawing from international cultural presence. It means clarifying institutional priorities. The BBC should be valued first as a national public institution with obligations to the public sphere, the nations and regions, and the wider UK media ecology. Commercial overseas activity must remain subsidiary to those purposes and should never become the implicit justification for preserving scale or privilege at home.

## **9 Parliamentary Oversight Remains Essential**

Ministerial and Parliamentary oversight remains essential because the BBC continues to shape the conditions under which public communication takes place. Oversight is necessary not only in relation to finance and governance, but also in relation to the BBC's effects on competition, plurality, civic information, technological transition, and public accountability. A democratic society should not be asked to accept that a powerful public institution is somehow diminished by being answerable to parliamentary scrutiny, as opposed to this responsibility being undertaken by Ofcom. Scrutiny is part of the constitutional settlement that gives such an institution legitimacy, and both Ofcom and the BBC must build trust with the public to maintain their positions in that settlement.

Better Media therefore recommends that any future Charter include explicit provision for regular parliamentary review. That review should include evidence sessions, public reporting obligations, and structured examination of the BBC's role in the wider communications environment. It should not be confined to managerial questions. Nor should it assume that audience reach alone is the appropriate measure of success. Parliament should be able to ask whether the BBC leaves room for other public-interest providers to flourish, whether it uses public assets openly and responsibly, and whether it continues to operate within the spirit of democratic accountability.

There is no contradiction between this and editorial freedom. Editorial decisions should not be directed by ministers or partisan actors. But Ministers and Parliament are entitled to determine the constitutional framework within which the BBC operates and to test whether that framework remains fit for purpose. Better Media regards that continuing parliamentary role as indispensable.

## 10 Recommendations

Better Media therefore recommends the following approach to Charter renewal:

- i. The Committee should reject the idea of a permanent Charter.
- ii. The Committee should affirm that the BBC is independent but not sovereign, and therefore remains fully within the democratic process.
- iii. If a longer Charter period is desired, a term of up to fifteen years may be considered, but only with strong mid-term and periodic mechanisms of democratic oversight.
- iv. The future funding settlement should recognise the right not to support the BBC financially and should remove compulsion to pay.
- v. Public policy should actively support the growth of independent media organisations able to deliver public purpose outside BBC infrastructure.
- vi. Appropriate BBC-generated data and technical resources should be treated as part of an open-data commons for use by independent and community providers.
- vii. The BBC should reduce its dependence on serving the global market and refocus on its domestic civic role.
- viii. Ministerial and Parliamentary oversight should remain essential throughout the life of any Charter.

## 11 Conclusion

This submission is not an argument against the BBC as such. It is an argument against constitutional exceptionalism, institutional over-centralisation, and compulsory support detached from democratic consent. The BBC can remain an important public institution while being placed more clearly within a plural and democratic communications order. Indeed, that is the direction in which Charter renewal should move.

Better Media's core contention is that the BBC should be understood as independent and important, but not sovereign and not above democratic review. A permanent Charter would undermine that principle and should be rejected. A longer Charter period might be justified, perhaps up to fifteen years, but only if it is accompanied by robust and continuing parliamentary oversight. The BBC should operate within the democratic process, not beyond it.

At the same time, the next settlement should widen the space for independent civic communication. There should be recognition of the right not to support the BBC financially. Public policy should help people establish their own independent media organisations able to meet public

purpose objectives without depending on BBC infrastructure. BBC-generated data should contribute, where appropriate, to an open-data commons. And the BBC should reduce its dependence on serving the global market so that its domestic civic obligations are not overshadowed by commercial ambition.

On that basis, Charter renewal can become more than a defence of institutional inheritance. It can become an opportunity to create a more open, plural and democratically accountable public media settlement for the United Kingdom.