

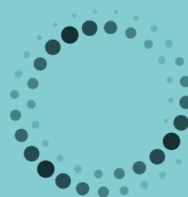
DEMOS

# OUR BBC

A BLUEPRINT FOR A  
MORE INDEPENDENT AND  
FUTURE-PROOFED BBC

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**EPISTEMIC  
SECURITY**  
NETWORK  
DEMOS

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# ABOUT THIS PAPER

Demos is the UK's leading cross-party think tank producing research and policies that have been adopted by successive governments for more than 30 years. We exist to put people at the heart of policy making and to build a more collaborative democracy. Demos Digital, Demos's digital policy research hub, specialises in digital policy making to create a future in which technology is built for the good of people and democracy.

This is the latest paper in the ***Epistemic Security*** programme that focuses on securing information supply chains within the UK and building resilience to adverse influence on our democratic processes. In the context of democratic backsliding and rising extreme populism, we are making the case this should be a central mission of this government.

The BBC represents a fundamental component of the UK and indeed the world's information infrastructure. At the commencement of the BBC's Charter Renewal process in 2026, this paper proposes routes to securing its survival, responsiveness and resilience in a highly volatile information environment. Our proposals aim to fortify the BBC's institutional and operational independence and facilitate meaningful citizen participation in order to strengthen its democratic legitimacy.

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# EXECUTIVE SUMMARY

**This paper is a blueprint for bold and transformative reform for a truly independent BBC.**

At this moment of political peril, the BBC Charter Renewal process of 2025-2027 must not represent incrementalist business as usual.<sup>1</sup> We need to think differently about the constitutional and governance underpinning of the BBC to ensure that it remains our BBC, rooted in universality and designed to be resilient in an era of political polarisation.

**The world is facing a democratic emergency.** Democratic norms are being eroded. Epistemic security - the processes by which reliable information is produced, distributed, acquired and assessed<sup>2</sup> - is now intertwined with national security. Blaise Metreweli, the new MI6 chief, warned in her maiden speech in December 2025<sup>3</sup> of disinformation, propaganda and influencing wars forming the “export of chaos” to the UK, leaving us in a space “between peace and war”.

**The BBC is a precious frontline defence in that information war.** More trusted than any other source of news, more shared across audiences that are otherwise divided. Countries with media vulnerable to polarisation and capture are also more vulnerable to democratic backsliding - a strong example being the United States.

**The BBC is therefore critical national infrastructure that provides a trusted backstop both at home and abroad.** It is vital not just to our national identity and creative economy, but to our national security, and must be made even more independent to navigate this new and increasingly fraught political context. It is our BBC.

**We are seeing attacks on the institutions of democracy across the world and on the media specifically.** Recent events surrounding the departure of the BBC director general raised new concerns about how the BBC maintains its independence under intense political scrutiny.

**This paper therefore makes recommendations for reinforcing and increasing the BBC's independence and accountability** in order to increase public trust and protect it from the extremes of political pressures that will lie ahead. It tackles three key issues: the BBC's constitutional basis, its governance structure and how public deliberation might play a greater part in building resilience against the political extremities of our times. There are many other things the Charter Renewal process is concerned with that we will engage with elsewhere, but we have given ourselves a core task here: how to make our BBC more independent for the future.

1 Demos - Curtis, P. (2025) Upgrading Democracy: A new deal to repair the broken relationship between citizen and state. <https://bit.ly/4jAaTG1>

2 Demos - Seger, E., Perry, H. & Hancock, J (2025) - Epistemic Security 2029: Fortifying the UK's information supply chain to tackle the democratic emergency - <https://demos.co.uk/research/epistemic-security-2029-fortifying-the-uks-information-supply-chain-to-tackle-the-democratic-emergency/>

3 <https://www.gov.uk/government/speeches/speech-by-blaise-metreweli-chief-of-sis-15-december-2025>

**It is our BBC - that should be reflected at the very heart of the corporation's constitution and governance.** While the 'we own it, we should have a say in it' argument is compelling, citizen deliberation is focused here as a means to strengthen independence and accountability, not as an end in itself. It would serve as a bulwark against political capture or extremism whilst deepening public legitimacy and enabling better decision-making by leadership, and as a further lock against attempts to threaten the fundamental existence or character of the BBC.

We therefore set out three sets of recommendations:

## RECOMMENDATIONS

### 1. STRENGTHENING THE BBC'S CONSTITUTIONAL FOUNDATIONS

**A charter for perpetuity.** We recommend removing the time limit on the BBC's Charter and moving to a perpetual model removing this fundamental constitutional vulnerability. A new perpetual Charter should entrench the BBC's object, mission, public purpose, independence and universality.

**Create a new "public lock" on any future changes to the Charter.** Any proposed amendment to this new perpetual Charter that threatens the future of the BBC would require supermajorities in all four legislatures of the United Kingdom and mandatory Citizens' Assembly deliberation. The Charter should further embed citizen deliberation to support the governance processes as set out below.

**A new BBC Independence Bill** would be introduced to set the terms of the Charter, establish a new BBC Independent Appointments Commission to appoint board members and a BBC Independent Funding Commission, which would also be subject to public deliberation given the power the funding model exerts on the future of the BBC.

### 2. IMPROVING AND REFORMING BBC GOVERNANCE

**Establish an Independent Appointments process** to the BBC Board and minimise government involvement to a veto on specific and narrow grounds.

**The Independent Appointments Commission should oversee the Chair appointment** replacing the current process of Ministerial appointment. Appointments should comply with clearer criteria about skills and behaviours required for the Board and a new conduct panel should investigate any complaints about board members.

**The BBC Board should be restructured from a unitary structure to a Supervisory Board Model** - separating governance oversight from executive management in a two-tier structure.

### 3. FACILITATE CITIZEN PARTICIPATION AT THE HEART OF THE BBC'S GOVERNANCE

By underpinning these constitutional and governance changes with bounded and specific public deliberation we can increase both the independence and accountability of the BBC, and make the people of the UK, and not their temporary elected representatives, the true guardians of its existence.

One-off BBC Citizens' Assemblies would be part of the "public lock" - along with super majorities in all four legislatures of the UK - that would be secured on any fundamental changes to the BBC's future as a result of Charter design, renewal or one-off government attempts to change or end them.

A standing BBC Citizens' Panel made up of a representative and periodically refreshing group of citizens would be established as a companion to both the Board and decisions relating to the Operational Agreement. The Panel would have defined and bounded powers and responsibilities, and a two-way relationship of structured dialogue with the Board. The Board, and in some cases government, would have to comply or explain in response to the Panel's recommendations.

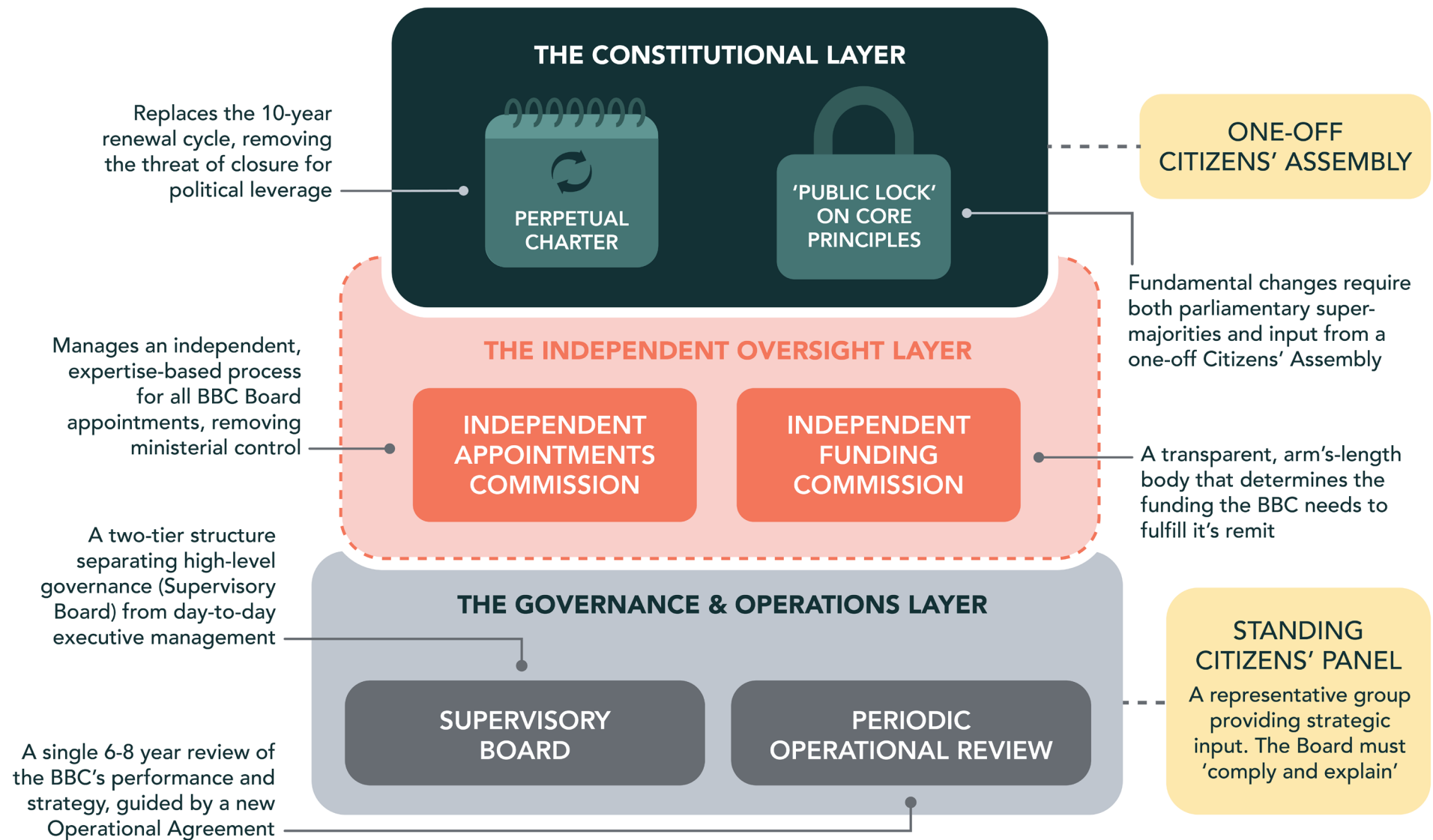
**We intend for this paper to inform the debate around Charter Renewal and will be feeding in separately to the Charter Renewal consultation.** We're keen to hear feedback on these proposals to help strengthen them and align around them. It is our BBC now and, we hope, in perpetuity.

**We are also sharing principles for reform to inform the wider Charter Renewal process.** These are designed to set the purpose of Charter Renewal and centre epistemic security, universality, public value and independence above all else.

**Failing to put the BBC on a more independent footing will weaken our national security,** further polarise communities and give rise to democratic vulnerabilities being experienced elsewhere. We must protect our epistemic security at this vital moment. Our BBC is critical.



**FIGURE 1**  
A NEW BLUEPRINT FOR AN INDEPENDENT BBC



# INTRODUCTION

**The world is facing a democratic emergency.** Our democratic norms are being eroded. Authoritarian states, such as Russia and China, are emboldened, and information warfare has become a central tactic. And there are new threats. In America, an increasingly autocratic regime is targeting the media, civil society, individual freedoms and the rule of law. By every measure, we are seeing democratic backsliding across the world<sup>4</sup> with trends that are rooted in populism, traits of which are now taking hold in the UK.

One driver and symptom of this emergency is a fragility in our epistemic security - the processes by which reliable information is produced, distributed, acquired and assessed.<sup>5</sup> Information supply chains are under attack from foreign powers, centralisation of power over information infrastructure through tech oligarchy, steady shrinking of our public service media and the collapse of our local news ecosystems, as well as vulnerabilities in our legislative and regulatory frameworks.<sup>6</sup>

Blaise Metreweli, the new MI6 chief warned in her maiden speech in December 2025<sup>7</sup> that we are operating in “a space between peace and war”, warning of disinformation, propaganda and influencing wars forming the “export of chaos” to the UK.

Brigadier Geoffrey Dodds of the UK’s Defence and Security Media Advisory (DSMA) Committee, interviewed by Ros Atkins on the BBC Media Show in January 2025 said: “Freedom of the media is a key aspect of national security. We don’t have corruption on the scale of North Korea or Russia, and that’s because we have a free press.”<sup>8</sup>

Information - trusted, shared sources of the truth - is now the frontline of our national security and conflict. Epistemic security is now intertwined with national security.

In this dangerous context, the British Broadcasting Corporation (BBC) provides a critical backstop both at home and abroad. The BBC has long been much more than a news organisation. For 100 years, since its founding Charter “deem[ed] it desirable that the [Broadcasting] Service should be developed and exploited to the best advantage and in the national interest”, it has been a critical part of our national infrastructure.

It is the backbone of our information supply chain, supplying and distributing the most trusted information,<sup>9</sup> at the frontier of new and emerging communications technologies. As a result it is a fundamental pillar of our cultural and democratic life. The start of the Charter Renewal process, which will dictate its conditions of service for the next ten years, represents both an opportunity to recharge and protect our public service media for the future, and a critical risk should this key pillar of democracy be weakened.

4 V-Dem Institute - Democracy Report 2025 - DR25: 25 Years of Autocratization - Democracy Trumped? - [https://www.v-dem.net/documents/61/v-dem-dr\\_2025\\_lowres\\_v2.pdf](https://www.v-dem.net/documents/61/v-dem-dr_2025_lowres_v2.pdf)

5 Demos - Seger, E., Perry, H. & Hancock, J (2025) - Epistemic Security 2029: Fortifying the UK’s information supply chain to tackle the democratic emergency - <https://demos.co.uk/research/epistemic-security-2029-fortifying-the-uks-information-supply-chain-to-tackle-the-democratic-emergency/>

6 ibid.

7 <https://www.gov.uk/government/speeches/speech-by-blaise-metreweli-chief-of-sis-15-december-2025>

8 <https://www.bbc.co.uk/sounds/play/m002pfbk>

9 As noted in the Information Supply Chain model outlined on p8, ibid, which includes delivery infrastructure.

This paper makes the case that the BBC is vital not just to our national identity and creative economy, but to our democratic resilience and even our national security, and must be made even more independent to navigate this new and increasingly fraught political context. A truly independent BBC, resilient to manipulation or capture, strengthens our national security.

We present recommendations for reinforcing and increasing the BBC's independence and accountability in order to increase public trust and protect it from the political pressures and fluctuations that might lie ahead.

The BBC is not immune to the crisis in trust facing all public institutions amid worldwide political polarisation and democratic backsliding - indeed recent events show it is vulnerable to this context. Because of its pivotal role as critical information infrastructure, how we strengthen the BBC's independence from the political influences of any one time, and accountability to the public, is as important as it is complex. It's for this reason that we have focused in-depth on how we can strengthen the BBC's constitutional and legal foundations, how it is governed internally and externally, and the role of public deliberation in governance.

This paper does not tackle every important question shaping the future of the BBC including: the content the BBC provides, the technologies, infrastructure and networks it develops, how the BBC drives growth in the creative economy, its potential relationship with the local and independent news ecosystem, or its funding options. We recognise that the services the BBC provides, including its role as a provider of media literacy education and its investment in AI-based services, and in partnership with local and independent media, are critical discussions Demos will engage with via other papers and formats.

We also recognise that how the BBC is funded is also interdependent with its independence, governance and legitimacy with the public. Our recommendations suggest a constitutional and governance framework that should be stable enough to permit funding arrangements to be evolved and negotiated, and that protects the BBC's core independence regardless of the final funding arrangement. We also do not tackle how editorial independence and oversight can be improved, which are again important considerations for discussion, but beyond the scope of this paper.

Our central purpose is to make the case for radical reforms to its governance, including by anchoring some of its decision-making in public deliberation in order to build resilience against extreme political forces. **It is our BBC - every single person in the country has a stake in it, and that should be reflected more in how it is run.**

We are publishing this just weeks after the UK government produced its Green Paper on Charter Renewal. It is actively seeking views on how to improve the BBC's independence, accountability and transparency, including using public engagement as a key mechanism, in order to strengthen public trust.<sup>10</sup> The culture secretary Lisa Nandy has also indicated that she intends to improve the political independence of the BBC in light of recent scandals and the resignation of the Director-General, Tim Davie.<sup>11</sup>

We intend for this paper to inform discussion and debate throughout the Charter Renewal consultation period. We will be publishing our own submission to the consultation process separately, ahead of which we welcome feedback on the ideas contained here.

10 DCMS (2025) Review of the BBC Royal Charter 2025 to 2027 - Terms of reference - <https://bit.ly/4aNrVle> ; DCMS (2025) Britain's Story: The Next Chapter. BBC Royal Charter Review, Green Paper and public consultation <https://bit.ly/49AVRLX>

11 <https://www.bbc.co.uk/news/articles/cdeg0ngnj0yo>

# WHAT IS AT STAKE?

## OUR EPISTEMIC AND DEMOCRATIC SECURITY

**As we enter this Charter Renewal process, the assumptions and mindset of all parties reflecting on the future of the BBC's purposes, constitution and governance must be fundamentally reset.** The BBC is central to not just our shared national identity and creative economy, but our national security. In this chapter, we expand on the role the BBC represents as a critical pillar of our democracy's epistemic security and as a public service media organisation, and why this moment is so dangerous.<sup>12</sup>

Over the last century, the BBC Charter has been renewed eight times, most recently in 2017.<sup>13</sup> While renewal processes have become increasingly contested over the past two decades, this renewal marks a pivotal but perilous moment, when the space for public service media is shrinking around the world and, in the UK, the very existence of the BBC is being called into question no longer just domestically,<sup>14</sup> by the leader of Reform UK Nigel Farage, but by powerful figures internationally, including Donald Trump.<sup>15</sup>

What in the past was a process to update the mandate for a media, cultural and technology organisation funded by the public is now a battle over the UK's sovereignty in a volatile and dangerous world. Never has the survival of the BBC been so crucial to the democratic future of the UK, and yet never has a Charter Renewal come in such adversarial conditions.

12 Outgoing BBC Director-General Tim Davie noted the 'epistemic crisis' in his May 2025 speech, The BBC: A Catalyst for Building Trust: <https://www.bbc.co.uk/mediacentre/speeches/2025/tim-davie-director-general-bbc-catalyst-for-trust>

13 BBC Royal Charter archive (<https://www.bbc.com/historyofthebbc/research/royal-charter>)

14 Politician Nigel Farage, who in 2015 argued as leader of UKIP that the Licence Fee should be reduced by 2/3 (<https://www.bbc.co.uk/news/election-2015-32390436>), made a 2024 manifesto pledge as leader of Reform UK to abolish it (<https://www.telegraph.co.uk/politics/2024/06/17/farage-vows-to-scrap-biased-bbc-licence-fee/>)

15 Green, D. - 'Donald Trump v the British Broadcasting Corporation: the battle begins' - Prospect Magazine, 19 December 2025 - <https://www.prospectmagazine.co.uk/ideas/law/the-weekly-constitutional/71916/donald-trump-v-bbc-battle-begins>

## **THE BBC AS THE BLUEPRINT FOR PUBLIC SERVICE MEDIA IN A DEMOCRACY**

The BBC is a globally distinctive model for institutionalising the “public interest” at the heart of our nation’s information environment - one that has set the blueprint for public service media worldwide. Governments and media providers from across the world continue to use the BBC - including how it is governed - as a key reference point for how to provide and protect public service media in their own countries.

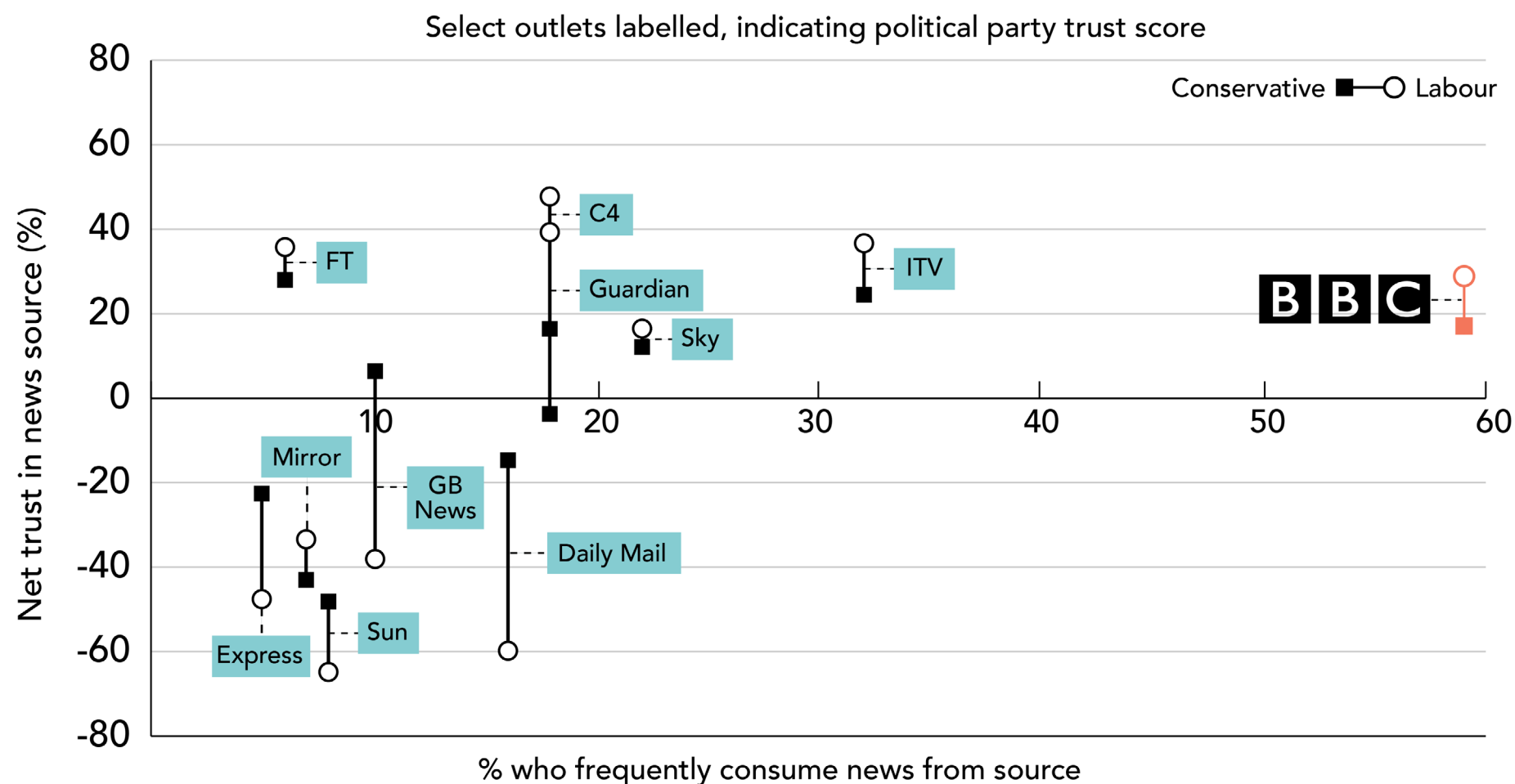
Critically, the BBC retains public trust across political divides. The data on the following pages demonstrates that not only is it the most trusted source of news in the UK, but most likely to be trusted by both Labour and Conservative voters. It is a critical resource. In the US comparative figures show low trust and high division between Republican and Democrat voters.

This makes the BBC more than a content or news provider: it is information infrastructure that contributes to the same shared narrative across the country.

The BBC’s Charter, governance structures and direct public funding via the licence fee were designed to protect this informational safety net and crucially its operational and editorial independence - ensuring the capacity and infrastructure to provide clear, consistent, reliable and plural information (regardless of the public service broadcasting provider) free from state control and commercial influence, while ensuring that it is transparent and accountable to the public. This information commons is intended to facilitate informed, inclusive debate resilient to the polarising forces of political or corporate capture. This is why renewing and strengthening the BBC’s Charter and governance structures is also a pivotal means of strengthening our democracy.

# CHART 1<sup>16</sup>

## CONSUMPTION OF AND TRUST IN UK NEWS OUTLETS (%)

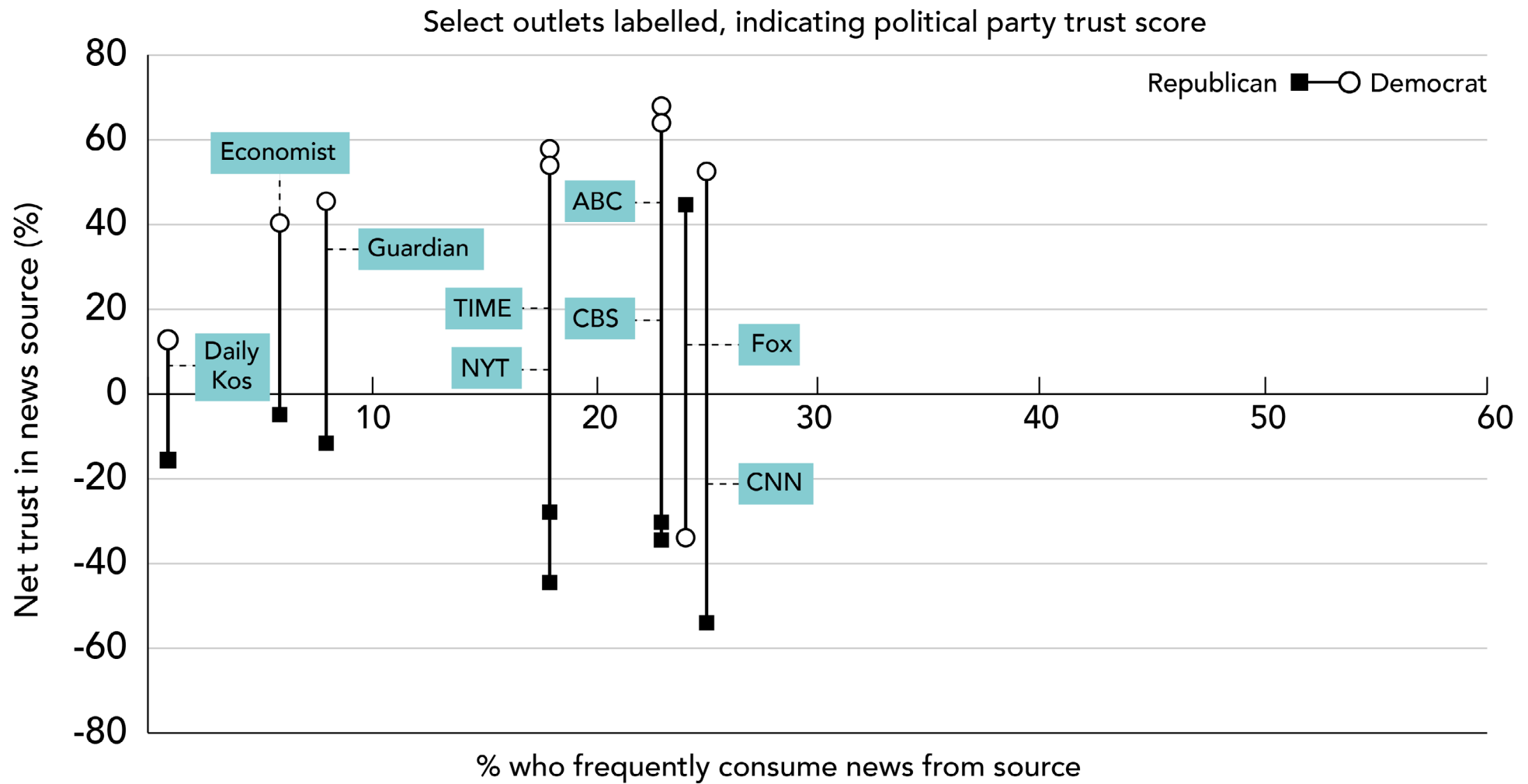


Source: FT analysis (26 May 2023) from YouGov data. (Net trust = the proportion of people who regard a media organisation as trustworthy minus the proportion of people who regard it as untrustworthy).

<sup>16</sup> BBC, 2024. A BBC for the Future <https://www.bbc.co.uk/aboutthebbc/documents/a-bbc-for-the-future.pdf>

## CHART 2<sup>17</sup>

### CONSUMPTION OF AND TRUST IN USA NEWS OUTLETS (%)



Source: FT analysis (26 May 2023) from YouGov data. Republican and Democrat based on vote in 2020 Presidential

17 BBC, 2024. A BBC for the Future <https://www.bbc.co.uk/aboutthebbc/documents/a-bbc-for-the-future.pdf>

## PUBLIC SERVICE MEDIA UNDER THREAT GLOBALLY: THE NEED TO EVOLVE

The threats facing the BBC are not just political, but technological too. Over the past 25 years, the old models of the public sphere in which the BBC and other public service media globally have operated<sup>18</sup> have been fundamentally reshaped and redefined and with it so should our assumptions for how to preserve the BBC's independence and accountability in the future.

Since its founding, the BBC has also been required to develop and provide the means by which public service information can be universally accessed and used. To accomplish this, it has needed to be at the forefront of technological innovation, to ensure that it is taking advantage of - and embedding public interest principles in - each new communication technology that emerges, from radio transmission to television, from the internet to AI.<sup>19</sup> It used to develop and own this infrastructure, but now the BBC, alongside other public service media globally, operate in an environment and on technologies and infrastructure actively hostile to their core mission.<sup>20</sup>

Where Silicon Valley founders once spoke in utopian terms of putting the world's knowledge in the palm of everyone's hands, venture-backed technological disruption has fundamentally rearchitected global information ecosystems, to be agnostic about, or even actively hostile to democratic, public interest outcomes.<sup>21</sup> Almost every layer of the 'tech stack' - the digital infrastructure and technologies - on which the UK and other democratic societies depend is imported, "creating systemic vulnerabilities and hampering [...] innovation and self-reliance."<sup>22</sup> A graphic of the equivalent national tech stack up to even 30 years ago would have looked very different, with many of the layers featuring a UK flag, some of which would have symbolised the BBC.

18 Donders, K, Pauwels, C. & Loisen, J. (2012). Introduction: All or nothing? From public service broadcasting to public service media, to public service 'anything'?. *International Journal of Media & Cultural Politics*. 8. 3-12. <https://intellectdiscover.com/content/journals/10.1386/macp.8.1.3.2>.

19 BBC R&D - 'New forms of value: A BBC for the data economy' (01 March 2023) - <https://www.bbc.co.uk/rd/projects/new-forms-value-bbc-data-economy>

20 'Elon Musk: Twitter owner changes BBC account's 'government funded' label' - BBC News, 12 April 2023 (<https://www.bbc.co.uk/news/entertainment-arts-65248554>)

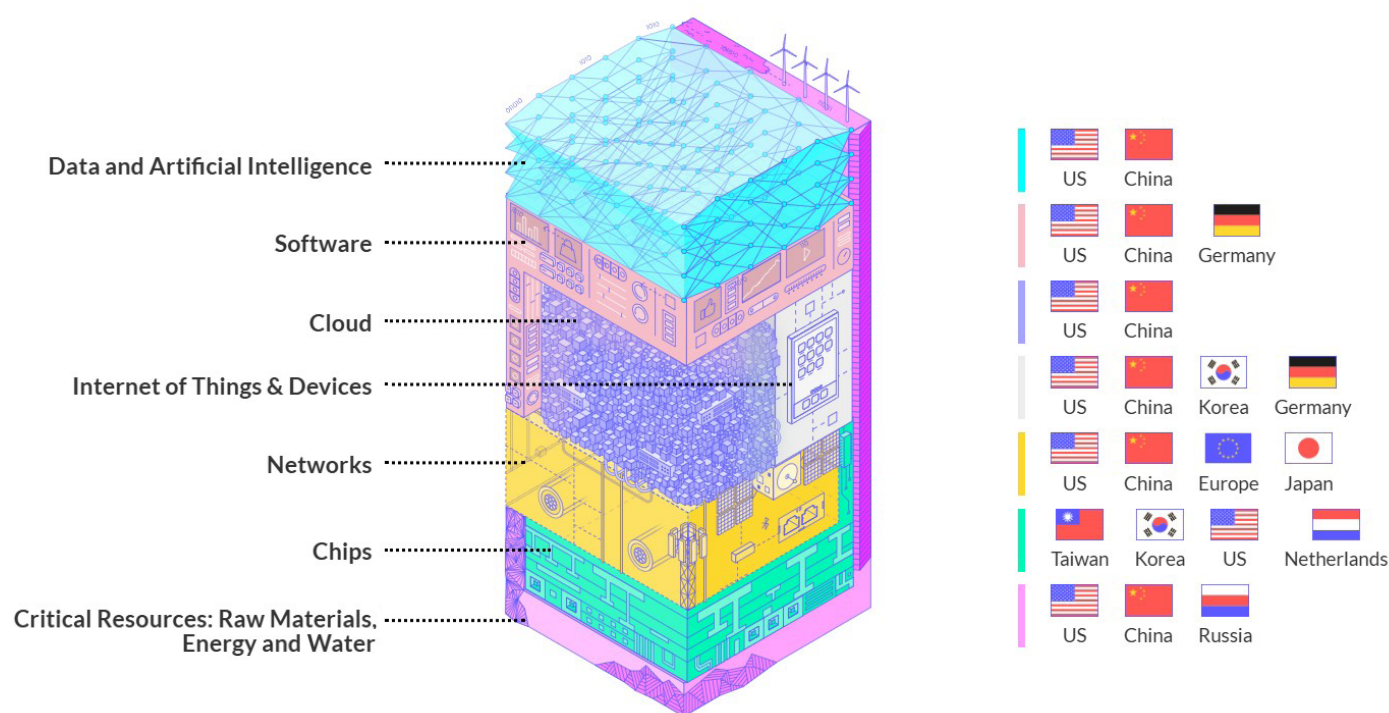
21 Ferne, T and B. Thompson - Where is the social internet taking us? - BBC R&D, 12 June 2025 - <https://www.bbc.co.uk/rd/articles/2025-06-social-media-change-issues-problems-report>

22 Bria, F., Timmers, P, Gernone, F (2025): EuroStack A European Alternative for Digital Sovereignty. Bertelsmann Stiftung. Gütersloh. <https://www.euro-stack.info/#report>



**FIGURE 2**

EUROPE'S TECH STACK, AND THE COUNTRIES THAT OWN OR CONTROL IT

Source: <https://euro-stack.info/>

Generative AI is industrialising the production and distribution of textual and visual mis/disinformation at near-zero cost, while algorithmic content platforms are optimising for attention and engagement with polarising content, regardless of its accuracy, drowning out verified information such as journalism or scientific research. US-owned companies including Google, Meta, Amazon, and X control the critical infrastructure through which millions of UK citizens access information, from local news ecosystems to global information flows: the hardware layer (devices, operating systems), the distribution layer (app stores, browsers, search, messaging, social media, streaming platforms, real-time information, and increasingly, AI interfaces, including agents), and the economic layer (payment systems, advertising systems, data extraction infrastructure). This is a systematic restructuring of the information environment to determine what software, content and information audiences can access through their devices, and who can be economically viable.

Public service media have to deliver 'universality' in an environment where the incentives are increasingly structurally tilted in the diametrically opposite direction. For the BBC in particular, despite needing to meet universal service obligations, it has been subjected to starvation cycles, resulting in an overall real-terms budget cut of 38-40% over 15 years<sup>23</sup> - which in some budget areas will be even higher. This requirement has been instituted while also needing to minimise its commercial impact. Such constrained funding conditions set the BBC up to fail in a media landscape where - unlike in previous Charter Renewal processes, where it was facing a range of domestic news and media competitors - it now faces a wholly new set of competitors that are new entrants, such as social media platforms, and which have few obligations and outsized resources.

23 Voice of the Listener and Viewer - '38% cut in BBC Public Funding: VLV Analysis' 21 October 2024 - <https://vlv.org.uk/news/bbc-public-funding-analysis/>

This perpetuates a vicious cycle in the degradation of the information environment that the BBC is mandated to strengthen - but on whose platforms and standards the BBC increasingly depends for reach.<sup>24</sup>

Prioritising growth and commercial interests over democratic outcomes means that the interests of the tech-oligarchs have aligned<sup>25</sup> with the authoritarian political aims of the current US administration. This was manifested clearly in the US-UK trade deal, in which tech oligarchs were central and visible,<sup>26</sup> and access to US platforms and technologies was treated as geopolitical leverage<sup>27</sup> - even after the deal was signed.<sup>28</sup> This convergence of interests treats democratic and public interest information environments not as systems to be served but as a competitive threat that must be captured or eliminated<sup>29</sup> - a shift in which domestic regulation is getting caught up.<sup>30</sup> In this context, strengthening the BBC's mandate and independence through the renewal of the BBC's Charter is no longer an opportunity, but an imperative.

Yet, globally, the BBC is among a shrinking number of truly independent public service media. In 2025, of 606 public or state media outlets worldwide, 512 are now classed as 'captured' or 'controlled'.<sup>31</sup> These fundamental shifts in the information environment and threats to public service media specifically mean that the basic infrastructure for shared knowledge and democratic deliberation can no longer be taken for granted, and reinforcing the structural independence of the BBC is a matter not just of media policy, but of epistemic and democratic security.

The UK, as highlighted in a recent MI6 briefing,<sup>32</sup> is facing sustained hybrid information warfare<sup>33</sup> at every level, from coordinated disinformation campaigns,<sup>34</sup> fake BBC content<sup>35</sup> and entrepreneurs gaming the algorithm,<sup>36</sup> to local LTN protests,<sup>37</sup> threats against film screenings<sup>38</sup> and harassment of individuals working in the public interest.<sup>39</sup> The UK is not the sole democracy facing this battle.<sup>40</sup>

24 For example, the BBC must provide universal and equivalent access, e.g. by providing subtitles with all programmes, but not all platforms enable this kind of support, even when they carry or provide access to BBC programmes.

25 Bria, F. et al (2025) - The Authoritarian Stack - <https://www.authoritarian-stack.info/>

26 Kirkwood, M - "Tech Prosperity Deal" Binds UK to US AI Dominance Strategy' - Tech Policy Press, 18 September 2025 <https://www.techpolicy.press/tech-prosperity-deal-binds-uk-to-us-ai-dominance-strategy/>

27 Hüscher, Dr P and S. Williams-Dunning - 'A Big, Beautiful US Investment Boost for the UK Tech Sector?' - RUSI, 26 September 2025 - <https://www.rusi.org/explore-our-research/publications/commentary/big-beautiful-us-investment-boost-uk-tech-sector>

28 Courea, E. - 'US puts £31bn tech 'prosperity deal' with Britain on ice' - The Guardian, 15 December 2025 <https://www.theguardian.com/us-news/2025/dec/15/us-pauses-tech-prosperity-deal-britain-donald-trump-keir-starmer>

29 US government (2025) National Security Strategy. <https://www.whitehouse.gov/wp-content/uploads/2025/12/2025-National-Security-Strategy.pdf>

30 BBC (2025) UK social media campaigners among 5 denied US visas. <https://www.bbc.co.uk/news/articles/cp39kngz008o>; Tobitt, C. - "Ofcom backs away from change to rule over politicians acting as presenters" - Press Gazette, 20 October 2025 - <https://pressgazette.co.uk/news/ofcom-rule-news-presenters-politicians/>

31 Dragomir, M. (2025). State Media Monitor Global Dataset 2025. Media and Journalism Research Center (MJRC). <https://doi.org/10.5281/zenodo.17219015>

32 GOV.uk - Speech by Blaise Metreweli, Chief of SIS, 15 December 2025 - <https://www.gov.uk/government/speeches/speech-by-blaise-metreweli-chief-of-sis-15-december-2025>

33 UK Cabinet Office - National Security Strategy 2025: Security for the British People in a Dangerous World - <https://www.gov.uk/government/publications/national-security-strategy-2025-security-for-the-british-people-in-a-dangerous-world/national-security-strategy-2025-security-for-the-british-people-in-a-dangerous-world.html>

34 Savage, M - 'YouTube channels spreading fake, anti-Labour videos viewed 1.2bn times in 2025' - The Guardian, 13 December 2025 - <https://www.theguardian.com/technology/2025/dec/13/fake-anti-labour-video-billion-views-youtube-2025>

35 Coyle, C - 'Far-right groups producing 'dangerous' false reports mimicking BBC coverage' - The Irish News, 11 October 2025 - <https://www.irishnews.com/news/northern-ireland/far-right-groups-producing-dangerous-false-reports-mimicking-bbc-coverage-HPSFOOF4I5AERFLWTBEGBL5IPM/>

36 'King of slop: How anti-migrant AI content made one Sri Lankan influencer rich' - The Bureau of Investigative Journalism, 16 November 2025 (<https://www.thebureauinvestigates.com/stories/2025-11-16/king-of-slop-how-anti-migrant-ai-content-made-one-sri-lankan-influencer-rich>)

37 Perry, H. et al - Driving Disinformation: Democratic deficits, disinformation and low traffic neighbourhoods - a portrait of policy failure - Demos <https://demos.co.uk/research/driving-disinformation-democratic-deficits-disinformation-and-low-traffic-neighbourhoods-a-portrait-of-policy-failure/>

38 Ritman, A. - "Director of Far-Right Doc Pulled From London Film Festival Says 'Fear Is Its Own Form of Censorship'" - Variety, 19 October 2024 - <https://variety.com/2024/film/global/undercover-exposing-the-far-right-doc-london-censorship-1236183314/>

39 Siddique, H. - "UK-based lawyers for Hong Kong activist Jimmy Lai targeted by Chinese state" - The Guardian, 15 February 2025 <https://www.theguardian.com/world/2025/feb/15/uk-based-lawyers-for-hong-kong-activist-jimmy-lai-targeted-by-chinese-state>

40 Chrisafis, A. - "France fears 'era of Trumpism' as public broadcaster comes under fire from right" - The Guardian, 31 December 2025 - <https://www.theguardian.com/world/2025/dec/31/french-public-broadcaster-under-parliamentary-inquiry-into-neutrality-workings-and-financing-udr>; Public Media Alliance - 2026 Predictions, 05 January 2026: <https://www.publicmediaalliance.org/psm-predictions-2026/>

The very values that open societies depend upon - pluralism, transparency, debate - are being weaponised to drive fragmentation and polarisation. Indeed at the 2025 NATO Summit, Allies committed to spending 1.5% of their 5% GDP security pledge to protect 'critical infrastructure, defend networks, ensure civil preparedness and resilience.'<sup>41</sup> This underlines the critical role that investment in information infrastructure<sup>42</sup> plays in our democratic society and the valuable epistemic security and defence asset that a trusted BBC and the wider public interest media and information ecosystem represents.

At the same time, the BBC is facing an unprecedented direct attack. The November 2025 BBC crisis leading to the resignation of the Director-General and the CEO of BBC News, compounded by the intended chilling effect of President Trump's \$5-10billion lawsuit against the Corporation,<sup>43</sup> has shown how even well-designed and -intentioned attempts to safeguard the BBC's independence and strengthen its governance (such as the 2016 Clementi Review<sup>44</sup>) can be bent towards political and ideological ends, and add fuel to authoritarian animus towards independent public media.<sup>45</sup>

In an era where control over information infrastructure is now openly part of geopolitics and trade, the BBC's role as a publicly accountable organisation, with public interest values and obligations, both in the content it carries, and the technologies through which it reaches people, must be recognised as critical national infrastructure and capacity, including through the security of its funding model and the robustness of its governance.

## INVESTING IN NATIONAL INFORMATION - UNIVERSALITY AS INFRASTRUCTURE

The visionary principle underpinning the social contract of the BBC was 'universality', meaning that everyone can access and interact with all public information and media services, regardless of income, disability, geography or platform, everyone finds content that meets their needs, tastes and interests, and everyone uses it as a result, which means that everyone should contribute to this shared societal infrastructure. The technologies and standards that enabled this were equally essential - and through BBC R&D, for example, this critical, innovative work continues into the cloud-based and AI-mediated world.<sup>46</sup> This technology and interoperability dimension echoes, as Helen Jay has argued,<sup>47</sup> strategic Digital Public Infrastructure (DPI) thinking now sweeping across the Global South. India's Aadhar and UPI,<sup>48</sup> Brazil's PIX,<sup>49</sup> and the emerging nexus of DPI and AI<sup>50</sup> demonstrate how publicly-governed DPI helps countries maintain control

41 Overview - 2025 NATO Summit - Key Decisions - <https://www.nato.int/en/news-and-events/events/2025/6/overview---2025-nato-summit-in-the-hague>

42 Advanced Research and Invention Agency (ARIA) Opportunity Spaces: Trust Everything, Everywhere: <https://www.aria.org.uk/opportunity-spaces/trust-everything-everywhere/> & Collective Flourishing - <https://www.aria.org.uk/opportunity-spaces/collective-flourishing/>

43 The BBC is currently seeking a dismissal of this lawsuit. Kiely, K, Lidsky, L - 'Trump lawsuits seek to muzzle media, posing serious threat to free press' - The Conversation, 12 January 2026 - <https://doi.org/10.64628/AAI.mnpvtwnwdn>; Tian, Y - "BBC seeks dismissal of Trump's multi-billion dollar defamation lawsuit" - BBC News, 13 January 2026 - <https://www.bbc.co.uk/news/articles/c394x4z8kpdo>

44 A Review of the Governance and the Regulation of the BBC, Sir David Clementi (01 March 2016) <https://www.gov.uk/government/publications/a-review-of-the-governance-and-regulation-of-the-bbc>

45 'How Donald Trump Blew Up The BBC' - Joel Simon, Columbia Journalism Review, 13 November 2025 (<https://www.cjr.org/analysis/how-donald-trump-blew-up-bbc-us-market-telegraph-panorama-jan-6.php>)

46 Aythya, J - 'The forces shaping the media landscape for the next generation' - BBC R&D, 10 April 2025 - <https://www.bbc.co.uk/rd/articles/5is-ai-internet-interactive-immersive-intermediated-technology>; The Responsible Innovation Centre (RIC), an independent research centre funded by UKRI & hosted by BBC R&D, is exploring how PSM can not just respond to, but shape technologies, including AI, from a public interest perspective, e.g. Jones, R and G. Hutchinson-Lee - 'Protecting public values in a digital age' - RIC, 23 June 2025 - <https://www.bbc.co.uk/rd/articles/2025-06-responsible-innovation-digital-public-values>

47 Jay, H (2024) - The Possibilities of a 'Public Service' Intervention to Support a Good Digital Society. British Academy. <https://www.thebritishacademy.ac.uk/publications/the-possibilities-of-a-public-service-intervention-to-support-a-good-digital-society/> .

48 Christopher, N - "India's plan to export its wildly successful digital payments system" - Rest of World, 10 April 2023 - <https://restofworld.org/2023/india-upi-digital-payments-diplomacy/>

49 Moreira, T - "Analysis: How Pix stepped on Zuckerberg's toes" - Valor International, 17 July 2025 - <https://valorinternational.globo.com/markets/news/2025/07/17/analysis-how-pix-stepped-on-zuckerbergs-toes.ghtml>; Bernard, R - "In Brazil, the free and instant mobile payment system Pix challenges US dominance" - Le Monde, 30 July 2025 - [https://www.lemonde.fr/en/economy/article/2025/07/30/in-brazil-the-free-and-instant-mobile-payment-system-pix-challenges-us-dominance\\_6743880\\_19.html](https://www.lemonde.fr/en/economy/article/2025/07/30/in-brazil-the-free-and-instant-mobile-payment-system-pix-challenges-us-dominance_6743880_19.html)

50 Ilavarasan, N. V. - 'Bridging AI and DPI for Long-term Development' - UNDP Digital, AI and Innovation Hub, April 26, 2025 <https://www.undp.org/digital/blog/bridging-ai-and-dpi-long-term-development>

over key technologies by requiring that systems underpinning “critical societal functions”<sup>51</sup> are designed for universal access rather than controlled or captured by private platforms.

Digital Public Infrastructure (DPI) systems are “shared means to many ends”,<sup>52</sup> designed to serve all citizens rather than to extract value from profitable segments. Similarly, the BBC is universally funded to ensure universal access to diverse, plural information across the entire UK, including areas and communities commercial providers and platforms abandon as unprofitable, and as other routes to information diminish or become concentrated.

This is crucial, for example, to help mitigate ‘information deserts’, where local and independent journalism may struggle to sustain itself,<sup>53</sup> and where algorithmic media will fill the void. The BBC commits to serve the whole nation with rigorous independence from political interference and commercial capture. In return, it receives guaranteed funding, editorial autonomy, freedom from political interference, and a unique constitutional status. Far from making the BBC an antidote to ‘market failure’, this makes the BBC a public investment in creating and shaping the information market to be viable for others to enter.<sup>54</sup>

Yet consensus around that constitutional status and social contract of the BBC as a universal service is under coordinated attack.<sup>55</sup> In previous Charter Reviews, these outside influences may have sought to exert political or commercial leverage over the BBC. This time, the BBC is under open attack from those who reject the notion of democratic information infrastructure that is outside commercial, state or even oligarchic control. While we do not in this paper go into detail on specific funding models or options, it is clear that universality is interdependent with universal funding, which must rule out as the main or majority funding model certain methods included in government Green Paper proposals, such as subscriptions or advertising.<sup>56</sup>

**In this context, this Charter Renewal process must not represent incrementalist business as usual. It requires a fundamental reset to make it more independent.**

51 Rao, K. & D. Eaves - “What is Digital Public Infrastructure and why does it matter?” - World Economic Forum, 19 December 2024 - <https://www.weforum.org/stories/2024/12/can-digital-public-infrastructure-help-guide-the-transformation/>

52 Eaves, D and J. Sandman - ‘What is Digital Public Infrastructure?’ - Co-Develop Fund - <https://www.codevelop.fund/insights-1/what-is-digital-public-infrastructure>

53 Bisiani, S. and Gulyas, A. 2025. Challenges and opportunities for UK local media: Insights from academic research. Canterbury Christ Church University. <https://repository.canterbury.ac.uk/item/9w1yz/challenges-and-opportunities-for-uk-local-media-insights-from-academic-research>

54 Mazzucato, M, Mazzoli, E and R. Conway - Written Evidence to House of Lords Communications and Digital Committee inquiry into BBC future funding - 1 March 2022 - <https://committees.parliament.uk/writtenevidence/107076/html/>

55 Warrington, J. - ‘How to break up the BBC’ - The Telegraph, 06 December 2025 - <https://www.telegraph.co.uk/business/2025/12/06/how-to-break-up-the-bbc/>

56 For recommendations based on a comprehensive and detailed international analysis of how 11 comparable PSM organisations are funded and governed, see Born, G & Lewis, J (2025) Public service media: funding and governance options: An international comparison to inform BBC Charter review 2027. The British Academy <https://www.thebritishacademy.ac.uk/publications/future-of-public-service-media/>

# WHY MAKE THE BBC MORE INDEPENDENT?

The BBC has always navigated extremes of political pressures, erupting in rows with governments over the years.<sup>57</sup> But never has it been subject to so much political pressure, at home and abroad. Editorial errors are being confected into controversies calling into question the BBC's foundational principles. The political context of democratic emergency and perpetual technological revolution - and the intersections between these two trends - means it needs to be stronger and more resilient. It is essential for our epistemic security and national sovereignty.

The response to this significant shift in political and technological context must be to make the BBC more independent of the political winds of any one moment.

We recommend taking several mutually reinforcing steps that entrench the independence and strengthen the accountability that are prerequisites for the survival of the BBC into its next 100 years.

This includes changing its constitutional foundations to make it less vulnerable to passing political trends, strengthening the independence of its governance systems and the BBC Board to avoid political appointees, and embedding specific and meaningful public deliberation.

Proponents of public deliberation - a set of approaches to involving the public in policy decisions that include Citizens' Assemblies, panels, juries and coproduction - have argued that it is a good in itself. While the 'We own it, we should have a say in it' argument is compelling, citizen participation is focused here as a means to strengthen independence and accountability, not as an end in itself.

57 Potter, S. - "BBC has survived allegations of political bias before – but the latest crisis comes at a pivotal moment" - The Conversation UK, 11 November 2025 - <https://theconversation.com/bbc-has-survived-allegations-of-political-bias-before-but-the-latest-crisis-comes-at-a-pivotal-moment-269464>

It would serve as a bulwark against political capture or extremism whilst deepening public legitimacy and enabling better decision-making by leadership, and as a further lock on attempts to change the fundamental existence or character of the BBC. Public deliberation is a tool for resilience, and for de-risking decision making in politically-contested contexts.

We make the case for a specific “public lock” on any decisions that will fundamentally change the constitutional basis of the BBC so that no government could choose to end the Charter or defund the BBC without support from all four legislatures of the UK i.e. the UK, Scottish and Welsh Parliament and the Northern Ireland Assembly, and a deliberative citizens’ assembly.

We also make the case for a novel form of public participation in the BBC’s governance, which would require the Board to consult a citizens’ panel on key decisions it is making. The purpose of this is not to give the public a say in the day-to-day running of the organisation, which demands specialist journalistic and management skills. The purpose is to give the BBC Board an anchor in a representative group of citizens with whom they can sensecheck decisions to enable them to more confidently navigate political scrutiny they may face.

Where decisions are contested, the public can help expose what the public interest is and help the Board maintain its independence of decision-making. On the flip side, if the Board becomes politicised, public deliberation can help hold it to account by making it justify where it is significantly out of step with public judgement.

Our recommendations have been structured around a set of principles we have designed that we propose should be applied to any reforms considered in the Charter Renewal process, collectively designed to achieve maximum independence. The key points are in the table below, and explored in more detail in Appendix 2 - we hope the Charter Renewal team in the Department for Culture, Media and Sport will consider these in detail.



**TABLE 1**  
DESIGN PRINCIPLES FOR REFORM

WHAT THE BBC COMMITS TO PROVIDE TO THE UK: FOUNDATIONAL PRINCIPLES			
<b>(1) Epistemic security:</b> The BBC must strengthen the resilience of the UK's information environment. An equivalent of the 'market impact assessment' or the 'public value test', but for protecting democratic resilience.		<b>(2) Universality:</b> The BBC serves everyone. This means universality of access, appeal, usage and of funding - meaning that everyone contributes, so that everyone benefits. Universality should also be embedded as a principle in governance enabling the public to have a direct, structural and meaningful role in the BBC's governance.	<b>(3) Public value above private interest:</b> The BBC's mandate is to generate public value that markets can struggle to prioritise. Reforms must aim to maximise the BBC's potential to create these public goods, while being balanced in their effects on markets.
WHAT THE BBC NEEDS AS STRUCTURAL FOUNDATIONS THAT EMBED AND PROTECT ITS FOUNDATIONAL PRINCIPLES			
<b>(4) Constitutional stability:</b> Any framework underpinning BBC independence, governance, and public accountability must function as a stable constitutional settlement.	<b>(5) Citizen involvement in governance:</b> Standing Citizens' Panels, with defined roles and powers in governance on constitutional and strategic issues, create a source of democratic legitimacy that the government cannot bypass or override.	<b>(6) Funding adequacy:</b> The BBC's funding must be sufficiently predictable, consistent and adequate to enable it to fulfil its purposes, to invest in a strategic way, and to protect it against political leverage.	<b>(7) Multi-layered defence:</b> True independence depends on overlapping safeguards across multiple domains. This principle means that no single point of failure should be able to compromise the whole. Enabling greater accountability requires also embedding multiple defences and veto points so that no single body can weaken protections unilaterally.
WHAT PROCESSES TO REFORM THE BBC SHOULD ENTAIL:			
<b>(8) Do no harm:</b> Reforms should demonstrably strengthen ('ratchet') - never weaken - protections for independence, accountability, or universality.	<b>(9) Transparency and accountability:</b> The BBC must be transparent about its strategic priorities, governance decisions, and editorial standards to build public legitimacy.	<b>(10) Adaptability:</b> The scope of each instrument or mechanism governing the BBC should be clearly bounded and distinct, and amendments to one should not be able to call others into question.	<b>(11) Learning from evidence:</b> The BBC should, as a feature of the new Charter and companion instruments, seek to match or raise best practice and international standards through ongoing benchmarking against peer public service media internationally.

The BBC is critical, national infrastructure for our epistemic and democratic security, but in its current state it is vulnerable and a prime target for adversaries who would like to weaken the UK. In this context, the Charter Renewal may be the last opportunity to embed genuine independence into the constitutional foundations of this strategic national asset, and to put it beyond the reach of those who would control, capture or weaken it.

In the remaining chapters, we examine what reforms we can implement through this Charter Renewal process to ensure that, by entrenching its independence and strengthening public accountability, we preserve the BBC as critical national infrastructure both in the current moment, and for future generations.



# STRENGTHENING THE BBC'S CONSTITUTIONAL FOUNDATIONS

At the heart of strengthening the BBC's political independence is reforming its constitutional foundation: the Royal Charter (Cm 9365) and the Framework Agreement. The BBC Charter sets out the BBC's mission, public purposes, governance structure, and independence guarantees.

In this chapter, we propose upgrades to both key instruments to bolster the organisation's independence from the government for the long term which we argue is undermined by the current time-limits, while maintaining its responsiveness to the wider ecosystem and public need via a new combined periodic Operational Review process (replacing the existing Framework Agreement and Mid-Term Review, and Ofcom's Periodic Review<sup>58</sup>).<sup>59</sup> In addition to this we create a new "public lock" which would mean that any fundamental changes to the future of the BBC could only happen with agreement of all four legislatures of the UK and a citizens' assembly.

## THE RISK OF TIME-LIMITS TO INDEPENDENCE

The Charter resulting from this current 2026-2027 Review and Renewal process will be the BBC's tenth. This 100-year-old constitutional foundation of a Royal Charter rather than an Act of Parliament reflects the BBC's special status of 'prestige and influence'<sup>60</sup> and protects it from political influence. This rationale has survived regular scrutiny,<sup>61</sup> and is reflected in the latest government Green Paper.

58 Ofcom's eight Annual Report on the BBC, and second Periodic Review of the BBC's performance (November 2025) - <https://www.ofcom.org.uk/tv-radio-and-on-demand/bbc/bbc-annual-report>

59 Please see the Appendix, 'How the BBC is governed' for further details on key constitutional instruments.

60 National Archives - 'A Royal Charter for BBC' (19 November 1926) <https://www.nationalarchives.gov.uk/education/resources/twenties-britain-part-two/royal-charter-for-bbc/>

61 Tessa Jowell, Secretary of State for the 2007 Charter Review, was in favour of keeping the Charter, telling the House of Lords that "a BBC governed by an Act of Parliament would be a different entity from a BBC governed by a Charter." <https://publications.parliament.uk/pa/ld201012/ldselect/ldcomuni/166/16605.htm#note23>. Lord Fowler argued in 2015, during the last Review, that the Charter should be abolished, and, like Channel 4, the BBC should be established as a statutory corporation through an Act of Parliament - <https://constitution-unit.com/2015/12/01/the-charter-review-should-take-steps-to-enable-the-bbc-to-work-independently-and-without-government-interference/>

Given that the government also states its intention to renew that Charter until “at least the end of the 2030s”, the core question should be: should the Charter be time-limited at all, when almost all other Charters are ‘permanent’?

### The rationale for a time-limited Charter

The rationale and cross-party consensus for having a time-limited Charter has been that, in return for this independence and special status, it permits the regular review of the BBC for two main purposes. First, so the government, parliament, and the public can regularly hold the BBC to account. Second, so the BBC can amend its purposes and structures in response to and anticipation of shifts in technology, demographics or media use, and thereby “to enable the BBC still better to serve the interests of Our People”<sup>62</sup> (the BBC’s version of ‘a more perfect union’).

### The negative impacts of a time-limited Charter

But, as the Green Paper itself notes, by setting an expiry date on the very existence of the BBC every 10 years, the Charter Review process creates extended periods of vulnerability for the very independence that the Charter purports to guarantee. This institutional Sword of Damocles infringes on the BBC’s independence by putting governments in control of the timing of the review and renewal process, allowing them to exert political pressure on and extract concessions from BBC management. And unlike the context for previous renewals, where consensus about the overall need for the BBC transcended disputes over editorial lines or over the boundaries of fair competition, this new volatile and polarising political context promises no such consensus in the future, meaning that time-limits are in fact now actively dangerous.

This danger is heightened particularly because negotiations over the funding settlement are not currently transparent and are controlled by the Treasury (a vulnerability to which we propose a remedy in the recommendations (3.10)). In concert with the Mid-Term Review during the Charter period, there is effectively a period of more or less continuous review by the government of the day. This presents a recurring threat to - and, depending on the disposition of the government of the day,<sup>63</sup> a crisis over - to the BBC’s ability to fulfil its public purposes. This cycle encourages short-term decision-making, including over cost-cutting,<sup>64</sup> or even ‘anticipatory obedience’, and is even perceived by some to chill editorial freedom in the run-up to Review.<sup>65</sup>

The most recent example of how the existing arrangements facilitate political interference involves George Osborne, the Chancellor in the Conservative government at the time of the last renewal. In 2010, citing austerity, Osborne announced the freezing of the licence fee to the end of the Charter in 2016, and forced the BBC to take over the cost of the Foreign Office-funded World Service and make an up-to-£100m contribution to the costs of Welsh-language broadcaster S4C, amounting to a real-terms 16% cut.<sup>66</sup> In 2014, Osborne and then-Prime Minister David Cameron publicly attacked the BBC for political bias (as many have before) over

62 DCMS (2016) Broadcasting. Copy of Royal Charter for the continuance of the British Broadcasting Corporation. [https://assets.publishing.service.gov.uk/media/5a80c6d740f0b6230269570c/57964\\_CM\\_9365\\_Charter\\_Accessible.pdf](https://assets.publishing.service.gov.uk/media/5a80c6d740f0b6230269570c/57964_CM_9365_Charter_Accessible.pdf)

63 Potter, S. - “BBC has survived allegations of political bias before – but the latest crisis comes at a pivotal moment” - The Conversation UK, 11 November 2025 - <https://theconversation.com/bbc-has-survived-allegations-of-political-bias-before-but-the-latest-crisis-comes-at-a-pivotal-moment-269464>

64 Kantar, J. - “BBC Confirms Plans To Save \$130M By Shrinking & Rethinking Workforce” - Deadline - 25 November 2025 - <https://deadline.com/2025/11/bbc-100m-savings-plan-project-ada-1236628458/>

65 Prospect Magazine - ‘Fixing the BBC’ - 17 December 2025 <https://www.prospectmagazine.co.uk/ideas/media/bbc-news/71818/fixing-the-bbc>

66 Robinson, J. and Sweney, M. - “BBC budget cut by 16% in spending review, George Osborne confirms” - The Guardian, 20 October 2010 <https://www.theguardian.com/media/2010/oct/20/bbc-cuts-spending-review>

coverage of the government's Autumn Statement.<sup>67</sup> During "clandestine talks"<sup>68</sup> over just a few days for the following funding settlement, Osborne forced the BBC to assume the cost of free TV Licences for the over-75s, effectively imposing a further cut on its budget, but also the politically unpalatable decision of whether to end or reform the benefit in the future.

Moving the BBC to a more permanent constitutional footing<sup>69</sup> would address the fundamental vulnerability created by periodic political renegotiation, and offer an opportunity to design new mechanisms for democratic oversight, funding, performance, planning and operational adaptation.

## THE ROLE OF THE FRAMEWORK AGREEMENT AND MID-TERM REVIEW

### What is the BBC Framework Agreement?

Under the current system, the BBC Framework Agreement (BFA) is a companion document that contains the operational details to complement the Charter's constitutional principles, and is negotiated to the same cycle. This Agreement is made between the Secretary of State and the BBC, and can be amended by mutual agreement outside of the Charter Review process, e.g. during the Mid-Term Review (MTR).<sup>70</sup> It includes: the scope and terms of all BBC services, detailed guidance on governance structures and procedures, including appointment processes, transparency and reporting requirements on the BBC, specific obligations related to e.g. Nations and Regions, independent commissions, news provision, details about the funding settlement, and details on the MTR. This last item, under Article 57 of the most recent Charter, was designed to assess and make recommendations for changes to the governance and regulatory arrangements for the BBC enacted under the 2015/16 Charter Review.

### Changes to the BBC Framework Agreement required by a change to a perpetual Charter

Under a perpetual Charter, the case for which is made above, the role and purpose of the BBC Framework Agreement (BFA) and the Mid-Term Review (MTR) would, by necessity, change, as the Charter Review process would no longer apply. A new Agreement would need to be designed to run alongside the permanent Charter in the form of a **new Operational Agreement**.

The Framework Agreement and the Mid-Term Review would both, along with Ofcom's Periodic Review, need to be replaced by a singular **Periodic Operational Review** instrument required by the Charter. This instrument should also be informed by a consultative and evidence-based process analogous to Charter Review and open to submissions from stakeholders. These two instruments (the BFA and the MTR) should therefore move from being types of closed agreement purely with the Secretary of State to a more transparent process with both public and Parliamentary scrutiny, and would serve more fully as a combined Periodic Operational Review. There should continue to be government, parliamentary and public scrutiny through this process, as well as through the Citizens' Panel proposed in Chapter 5, to continue to strengthen the sense of the BBC's public legitimacy.

67 Hope, C. - "Tories at war with 'biased BBC'" - The Telegraph, 4 December 2014 - <https://www.telegraph.co.uk/culture/tvandradio/bbc/11274340/Tories-at-war-with-biased-BBC.html>

68 Waterson, J. - "Seeds of BBC licence fee decision deftly planted by George Osborne" - The Guardian, 10 June 2019 - <https://www.theguardian.com/media/2019/jun/10/seeds-of-bbc-licence-fee-decision-deftly-planted-by-george-osborne>

69 Various international examples of statutory frameworks with varying degrees of constitutional protection offer insights for the UK context. Further comparative analysis is recommended, based on reputable international sources, such as Born & Lewis (2025) <https://www.thebritishacademy.ac.uk/publications/future-of-public-service-media/>

70 GOV.uk - CP999 - The BBC Mid-Term Review - January 2024 - [https://assets.publishing.service.gov.uk/media/65af9545fd784b0010e0c6dc/E02987480 - CP\\_999\\_BBC\\_Mid-Term\\_Review\\_Web\\_Accessible\\_1\\_.pdf](https://assets.publishing.service.gov.uk/media/65af9545fd784b0010e0c6dc/E02987480 - CP_999_BBC_Mid-Term_Review_Web_Accessible_1_.pdf)

**TABLE 2**  
SUMMARY OF PROPOSED CHANGES TO THE FRAMEWORK AGREEMENT AND  
MID-TERM REVIEW PROCESS

ASPECT	CURRENT SYSTEM	RECOMMENDATION
<b>Constitutional basis</b>	Time-limited Charter (renewed every 7-10 years)	Permanent or perpetual Charter (no expiry date), at minimum generational (e.g. 25 years)
<b>Contract</b>	Framework Agreement (renewed alongside Charter) between the BBC and the Secretary of State	A new Operational Agreement assessed and amended through a Periodic Operational Review, the final arbitrators of which would be the BBC and the Independent Funding Commission
<b>Primary Review Instruments</b>	Framework Agreement and Mid-Term Review, and Ofcom's Periodic Review	A single Periodic Operational Review that would assess and amend the Operational Agreement
<b>Relationship to the Charter</b>	Terms agreed during the Charter Renewal process, and the Framework Agreement is coterminous with Charter	Terms for the Periodic Operational Review, including its maximum & minimum frequency would be set out in the Charter
<b>Character of Review</b>	Interdependent with periodic renegotiation of BBC's existence opens potential for coercive or punitive Framework Agreement	Decoupling from BBC's existence permits more substantive and strategic review focused on maximising public value and benefit, including assessing BBC performance against Mission and Purposes, and setting funding envelope for the next period
<b>Review oversight</b>	Overseen by Secretary of State and government, with Renewal process serving as input point for relevant parties, incl parliament, Ofcom, NAO, citizens and industry	Overseen by Independent Funding Commission, with consultation with and input from all relevant parties, incl government, parliament, Ofcom, NAO, citizens (including the new proposed Citizens' Panel) and industry
<b>Frequency of review</b>	Framework Agreement on same 7-10 year cycle as Charter, and timetable and deadline for Mid-Term Review set in Charter and Framework Agreement (ca 4-5 years into Charter)	Every 6-8 years for strategy, performance and related matters
<b>Citizen input</b>	Consultative through proxy methods via BBC, Ofcom, public consultation - audience insights, surveys, consultations.	Substantive and direct by addition of assessment by and input from BBC standing Citizens' Panel, with required responses to questions and recommendations

As with the current Framework Agreement, questions of the BBC's foundational provisions would be entirely beyond its scope. Crucially, by making the Charter that it complements perpetual, and removing the Sword of Damocles effect, the political leverage and associated negative effects that this enables (as well as renewal-linked expenditure that can be redirected), this will transform the combined BFA-MTR into a much more substantive, circumspect, collaborative and strategic process. For example, it would enable inclusion of additional areas of review such as the BBC's contribution to public interest technology, the specifics of citizen involvement in BBC governance, and the BBC's contribution to the information environment, including the wider news ecosystem.

The role of the public, as we set out further in following sections, is to anchor this decision making in public judgement to protect against political decisions that might be wildly out of step with public sentiment.

## **THE NEED FOR ADDITIONAL STATUTORY PROTECTIONS FOR BBC INDEPENDENCE**

Given the changed circumstances outlined above, the BBC should continue to be constituted by a Royal Charter, made permanent through amendment to the Charter itself, in which its foundational provisions are entrenched. Parliament is sovereign, and, as such, even with such an amendment to the Charter, a future government could - and should - be able to gain the supermajority required to dissolve the BBC.

However, given the unique status of the BBC we recommend that the threshold against its sudden dissolution should be higher.<sup>71</sup> This would involve the provisions for a citizens' assembly. We recommend that the government should bring forward a 'BBC Independence' bill that would specifically add additional checks and balances against any threat to the BBC's foundational provisions, such as its independence and its universality. Given the large cross-party consensus at this time, there is a realistic opportunity to propose this.

By the Charter being amended in this way, there would be no real authority or mandate for a future government to contemplate reviewing the BBC without a significant catalyst or trigger.

These statutory protections would constrain how the Charter can be amended, and would increase the BBC's independence and its defences against interference, by establishing three independent bodies (the BBC Independent Funding Commission, Independent Appointments Commission and Citizens' Panel) to remove ministerial or political control or discretion over key aspects of the BBC. Such ideas are expanded further below.

<sup>71</sup> Sandford, M - House of Commons Library, 05 November 2025 - 'Supermajorities in UK government' - <https://commonslibrary.parliament.uk/supermajorities-in-uk-government/>; Thimont, M, Sergeant, J., Pannell, J (2022) - A framework for reviewing the UK constitution - Institute for Government & Bennett Institute for Public Policy - <https://www.instituteforgovernment.org.uk/sites/default/files/publications/framework-reviewing-uk-constitution.pdf>

## RECOMMENDATIONS

In order to strengthen the independence of the BBC, remove the risk of political interference and provide a more secure constitutional foundation, the Government should therefore:

**3.1 Remove the time-limit from the Charter.** The fact of the BBC's existence should not be re-negotiated every 7-10 years. Grant the BBC 'perpetual existence', or, at minimum, an end date to the Charter that is at least generational (25 years), in order to clearly separate the BBC's guaranteed right to exist from operational requirements.

With a perpetual Charter in place:

**3.2 Entrench in the now perpetual and simplified Charter, the BBC's Object, Mission, Public Purposes, independence, and universality as foundational provisions.** This then means that the BBC's Object, Mission and Public Purposes are beyond the scope of Operational Reviews and cannot be regularly amended by an individual government of the day. Instead, it would require a process as described in 3.3.

In particular, in the era of epistemic security, the role of the BBC as a public interest technology organisation is critical to the UK's digital and democratic sovereignty. In common with other independent researchers and organisations,<sup>72</sup> we recommend reintroducing the Purpose from the 2007-16 Charter that the BBC should "deliver to the public the benefit of emerging communications technologies and services", with the amendment "and infrastructure, to enhance the quality and sovereignty of our democracy".

**3.3 Create a 'public lock' ensuring the foundational provisions of the BBC cannot be amended without parliamentary supermajorities in all four legislatures of the UK, by requiring Advisory Reports from an independent citizens' assembly** (as proposed in Chapter 5) prior to Parliament being able to act.

The Assembly would be given a time-period of three years by the end of which it must table a first Advisory Report before Parliament. A second and distinct Assembly with a new body of members would then table a second Advisory Report after a period of three years. This flexible time-period is used within other highly-consequential Assemblies in order to guard against political capture or moments.

This change would require bringing forward companion legislation that reinforces the BBC's independence and its accountability to the public through statutory protections.

This would align with domestic and international best practice as demonstrated by the creation of the Press Recognition Panel<sup>73</sup> in its 2013 Royal Charter. This was reinforced by Clause 96 of the Enterprise and Regulatory Reform Act<sup>74</sup> that specifies the high parliamentary thresholds required to approve amendments to that Charter in the various Houses and Chambers of the legislative bodies of the UK and devolved nations. This additional companion legislation helps protect such bodies against political capture or anti-democratic exploitation of short-term crises.

72 Voice of the Listener and Viewer - 'VLV Citizens' PSM Forum issues Joint Statement ahead of BBC Charter Renewal' - 11 December 2025 - <https://vlv.org.uk/news/vlvs-citizens-psm-forum-unveils-joint-statement-ahead-of-bbc-charter-renewal/>

73 Impress - '10 Years of the Royal Charter: Building a Sustainable Legacy for Press Regulation' (30 October 2023) <https://www.impressorg.com/10-years-of-the-royal-charter-building-a-sustainable-legacy-for-press-regulation/>

74 Enterprise and Regulatory Reform Act - <https://www.legislation.gov.uk/ukpga/2013/24/section/96>



**3.4 Include within the Charter a clause specifying that the funding determination process must be transparent and independent of government - ensuring the BBC's independence and its funding is protected.** Furthermore, to fulfil its purposes, it must have adequate resources, which must be the ultimate responsibility of the government.<sup>75</sup>

The current Charter assigns responsibility for the BBC funding settlement to the Secretary of State (Article 43), and the Framework Agreement specifies that, while the BBC collects the Licence Fee, the Secretary of State can choose to withhold some of this by agreement with the Treasury.<sup>76</sup> In the change to a permanent or perpetual Charter, the opportunity should be taken to make this process more independent, establishing high-level principles within the new Charter, through a Schedule in which the specific terms and requirements for the process for determining the BBC's funding must be set out, including that the funding settlement should be determined by a new Independent Funding Commission (outlined in 3.10 below). Specific arrangements should transition to the successor document to the Framework Agreement - the new Operational Agreement.

**3.5 Based on 3.1, include within the Charter a clause that an Operational Agreement that runs alongside the Charter must be agreed between the BBC Board and the new independent body, to which the Government would, in the Charter, delegate this authority. The clause should also specify that the BBC should undergo periodic Operational Reviews on a cycle of 6-8 years,** combining elements and functions of the BBC Framework Agreement (Article 53) and its Mid-Term Review (Article 57), and which will assess and amend the Operational Agreement. This, combined with the shift to the stability of a perpetual or generational Charter, helps maintain the essential process of democratic scrutiny through periodic review of the operational plans and performance of the BBC and evolving public needs, as well as protecting the BBC's independence.

A Schedule to the Charter should be created in which the specific terms and remit of the Operational Agreement and the Operational Review must be set. Measures for the new Operational Review system should include:

- **Operational Review should be conducted by the newly created Independent Funding Commission (IFC) rather than a Minister:** This independent body (required by the Charter and created under statute, as noted in 3.10) should be created and appointed through a transparent process with a veto system (much like judicial appointments) overseen by the Independent Appointments Commission (proposed in 3.9). Representatives should have direct expertise of areas being reviewed. Consideration should also be given for input through the standing Citizens' Panel proposed in 3.6 and 5.
- **A clearly bounded scope:** Operational Reviews should be the primary mechanism for independent evaluation of the BBC's performance, including the extent to which it has delivered public value against its Purposes, the effectiveness of governance processes (e.g. the scope, composition and functioning of the Board and of a new Citizens' Panel), operational effectiveness, technology adaptation, and would set the funding envelope

<sup>75</sup> Article 5 of the European Media Freedom Act, among other instruments, establishes this principle: [https://www.media-freedom-act.com/Media\\_Freedom\\_Act\\_Article\\_5\\_\(Regulation\\_EU\\_2024\\_1083\\_of\\_11\\_April\\_2024\).html](https://www.media-freedom-act.com/Media_Freedom_Act_Article_5_(Regulation_EU_2024_1083_of_11_April_2024).html)

<sup>76</sup> "The Secretary of State must pay to the BBC out of money provided by Parliament sums equal to the whole of the net Licence Revenue or such lesser sums as the Secretary of State may, with the consent of the Treasury, determine." BBC Framework Agreement, Article 49 (1). <https://www.gov.uk/government/publications/bbc-charter-and-framework-agreement/bbc-framework-agreement>

for the BBC's next operational period. This would explicitly exclude from the scope of review any Charter or Statute-level foundational questions related to existence, independence, core purposes, universality, funding adequacy, or editorial independence.

- **Transparency of Operational Review process:** The sessions of the Independent Body should be publicly documented, livestreamed & archived as proactive disclosure
- **Ratchet mechanisms:** Operational Reviews can only strengthen protections of the BBC's independence, not weaken them, e.g. changing arrangements for editorial oversight that strengthen protections for editorial independence
- **International benchmarking:** Assessments should be conducted by this independent body of key characteristics of governance, independence, incorporation, financing and funding against global public service media (PSM) standards.<sup>77</sup> The BBC should continually be seeking to learn from and set new international standards and best practices. Where possible, encode within BBC governance, structures, rules etc, harmonisation with or exceeding of international standards on freedom of expression, media freedom, best practice in independent public service media, and ensuring that the government's own policies domestically and internationally are in harmony.
- **Multiple safeguards against populist capture:** No single actor should be able to unilaterally weaken legal, policy or practical protections for the BBC's independence. For example, the above transparency requirements should serve as a deterrent for most; citizen involvement should be required as a lock on significant changes.

**3.6 Establish within the Charter the requirement for the BBC to devise appropriate methods for involving citizens in its governance.** The legislation would set the responsibility, aims and principles, and the Operational Agreement the practicalities for how this should be structured, designed, implemented, evaluated and adjusted. It should be assessed and if necessary amended through the Operational Review (3.5) superseding the Framework Agreement and Mid-Term Review. We address this in detail in Chapter 5.

**3.7** The government should bring forward a Charter-amending bill amending the Charter which would enact **statutory protections in order to reinforce the BBC's foundational provisions**, such as independence and universality. These statutory protections should perform four principal functions as described in 3.8-3.11.

**3.8** This would require **any future amendments to the BBC's foundational principles to be passed by a future Charter amendment which requires a significant democratic majority** (e.g. 2/3 in both Houses of Parliament, the Scottish Parliament and the devolved assemblies), preceded by the first and second Advisory Reports from the Citizens' Panel. This 'public lock' would match or exceed the protections for the 2013 Charter on the Self-Regulation of the Press,<sup>78</sup> which created the Press Recognition Panel; Clause 96 of the Enterprise and Regulatory Reform Act<sup>79</sup> specifies that any changes to the Charter require meeting the threshold set in Article 9 of the Charter itself. (Mirroring the amendment to the BBC Royal Charter in 3.3 above.)

<sup>77</sup> Standards such as the State Media Monitor (<https://statemediamonitor.com/methodology/>)

<sup>78</sup> Royal Charter 14 March 2013 - [https://assets.publishing.service.gov.uk/media/5a7b11dee5274a319e77ccd5/Royal\\_Charter\\_14\\_March\\_2013.pdf](https://assets.publishing.service.gov.uk/media/5a7b11dee5274a319e77ccd5/Royal_Charter_14_March_2013.pdf)

<sup>79</sup> Enterprise and Regulatory Reform Act - <https://www.legislation.gov.uk/ukpga/2013/24/section/96>



**3.9 Establish an Independent BBC Appointments Commission that would create an independent, professional and expertise-based board appointments process,** fully independent of ministerial influence or control. This would provide a pipeline of qualified candidates for the BBC Board committed to public service. It should draw on existing models such as the Judicial Appointments Commission and the Press Recognition Panel. This will better insulate governance of the BBC from political forces. If there is scope to expand the role of this body beyond the Independent Funding Commission and the BBC Board to other public media bodies like Channel 4 and Ofcom, as proposed by the Voice of the Listener and Viewer,<sup>80</sup> this should also be actively explored.

The current Charter lays out detailed guidance for the Board (Articles 19-35), including how members shall be appointed. In the change to a permanent or perpetual Charter, the opportunity should be taken to make this process more independent, establishing high-level principles within the new Charter, including that appointments to the Board should be determined by a new independent appointments commission (outlined in chapter 4 below). Specific arrangements should transition to the successor process to the Framework Agreement.

**3.10 Establish an Independent BBC Funding Commission, as mandated by the new Charter,** as an arm's-length body - independent of ministerial or Treasury control - that would use a transparent and evidence-based process to assess and calculate the level of funding the BBC requires to deliver its remit and purposes. The findings of this body will be binding upon the government, which must then provide the correct amount of funding through appropriate mechanisms. This body, whose members would be appointed through the Independent Appointments Commission in 4.1, would be stood up for defined periods in which the BBC's funding envelope must be set, such as the periodic Operational Review, which it would lead. This should draw on the model of the German KEF<sup>81</sup> recommended by many stakeholders, and on the VLV's 2015 draft bill for a BBC Funding Body.<sup>82</sup> This will turn the funding of the BBC away from political instrumentalisation.<sup>83</sup>

#### **Remit and Authority:**

- The Commission will have sole authority to determine the level of resources that the BBC requires to fulfil its Public Purposes
- The Commission will provide a transparent, evidence-based recommendation on the total funding required (including inflation indexation, and additional funding required to cover costs that a future government may seek to impose on the BBC to prevent erosion of services). Other relevant bodies, including the government, Ofcom, National Audit Office and industry bodies may submit or be asked to provide evidence to the Commission. The Commission may request other research to be carried out.
- The government (with duty remaining with the Secretary of State) will determine the universal and other mechanisms by which these funds should be raised, such as a reformed licence fee, a household levy or other means.

80 VLV Briefing on BBC Charter Renewal, 18 December 2025 - <https://vlv.org.uk/news/vlv-briefing-on-bbc-charter-renewal/>

81 See for example Sehl, A. (2024), Funding of Public Service Media in Germany. The Political Quarterly, 95: 78-85. <https://doi.org/10.1111/1467-923X.13370>; Born and Lewis, op. cit.

82 VLV Proposes Licence Fee Body, 22 September 2015 - <https://vlv.org.uk/news/vlv-proposes-licence-fee-body/>

83 As with the Independent Appointments Commission, if there is scope to expand the role of this body to address wider funding issues within the public service media ecosystem, this should be actively explored.

- The Commission's recommendation must (as in Germany) be binding upon the government, which can only query and deviate from this determination on strictly-defined fiscal grounds related to e.g. household affordability. The objections must be stated publicly, and remain subject to appeal, or judicial review.
- The Commission should consider whether - as the KEF is also proposing to do - to move from Ex-Ante (reviewing needs *before* a funding period) to Ex-Post (assessing periodically whether the BBC successfully fulfilled its mandate) evaluation by an independent body of experts, with 'performance-linked funding'. The Commission would have the corresponding power - if it found that the BBC had not met the standards required - to impose targeted deductions from subsequent financial allocations. This might dovetail more neatly with the Operational Reviews, and their partial focus on what value the BBC has delivered for the public.

## **FURTHER CONSTITUTIONAL FOUNDATION RECOMMENDATIONS**

Updating the Charter, including the BBC's Public Purposes, also provides an opportunity to strengthen other aspects of the BBC's role as a critical backstop for our epistemic security. We recognise the range of proposals within the government Green Paper and elsewhere that propose updates that recognise the threats and vulnerabilities within our information environment. Most are beyond the scope of this paper due to its focus on strengthening the BBC's independence and accountability.

However, the proposal within the government's Green Paper and other partners' proposals to introduce a new Purpose to 'counter misinformation and disinformation' is one that, whilst well-intentioned, we fear risks undermining the independence of the BBC. Such proposals therefore become relevant to the scope of this paper, but are not possible to tackle with sufficient depth at this stage. In short, rather than introducing a negative purpose to counter negative trends in the information environment, we believe it would be preferable to emphasise the strengths and capabilities of a fully independent BBC to contribute to a stronger and healthier information environment in the UK and globally.

We will respond to this and other important proposals separately in much greater depth within our own submission to the Green Paper consultation process.

# IMPROVING AND REFORMING BBC GOVERNANCE

In this chapter, we present reforms to improve the effectiveness of the BBC Board model, including the appointments process and its overall structure, in order to strengthen the organisation's independence from the government.<sup>84</sup>

## WEAKNESSES IN THE GOVERNANCE OF THE BBC

### Existing structural weaknesses

While triggered by poor editing decisions, there is wide agreement that the 2025 'Trump-edit' crisis represents a governance failure triggered by structural weaknesses in the current unitary board model. Such weaknesses in turn enable political pressure on editorial independence.<sup>85</sup>

This makes governance reform an imperative during Charter Renewal. While much of the UK's constitutional arrangements<sup>86</sup> may have survived according to the 'Good Chaps Theory'<sup>87</sup> ("a shared understanding of what constitutes good behaviour in public and political life, and trust that people in positions of power will abide by that understanding") in the world as it exists now, we must design systems that are 'zero-trust'.<sup>88</sup> The government has also suggested open-mindedness to how the BBC Board model could be better structured and Lisa Nandy has indicated that she will move to a more independent appointments system.<sup>89</sup>

84 Please see the Appendix, 'How the BBC is governed' for further details on the internal accountability mechanisms at the BBC.

85 See D. Coyle, (2024), The Governance of the BBC. The Political Quarterly, 95: 20-24. <https://doi.org/10.1111/1467-923X.13382>

86 Torrance, D., House of Commons Library - "The United Kingdom constitution - a mapping exercise" - 17 December 2025 - <https://commonslibrary.parliament.uk/research-briefings/cbp-9384/>

87 Institute for Government (2022) - "The failure of "good chaps": are norms and conventions still working in the UK constitution?" - <https://www.instituteforgovernment.org.uk/event/online-event/good-chaps-norms-and-conventions-constitution>; Hennessy, P. "'Harvesting the cupboards": why Britain has produced no administrative theory or ideology in the twentieth century', Transactions of the Royal Historical Society, vol. 4, 1994, p. 205. <https://doi.org/10.2307/3679221>

88 National Cyber Security Centre - Zero-Trust Architecture Design Principles <https://www.ncsc.gov.uk/collection/zero-trust-architecture>

89 <https://www.bbc.co.uk/news/articles/cdeg0ngnj0yo>

Professor Diane Coyle, Bennett Professor of Public Policy, University of Cambridge and a former vice-chair of the BBC Trust, says in her 2024 paper on 'The Governance of the BBC':<sup>90</sup>

*"Unitary boards are the exception rather than the rule globally in the commercial world. The idea that most public companies are widely owned and traded is therefore a myth, and outside the Anglo-Saxon world, supervisory or dual Board structures are the norm. The non-executive supervisory boards generally have wider stakeholder representation, including employees and civil society members.*

*So, the insistence in UK corporate governance debates in general and, in the mid-2010s, debate about BBC governance in particular, that a unitary board is clearly better, is in fact a maverick position. In the case of the BBC there are sound reasons for a dual Board structure."*

## The tensions shaping the BBC's governance

While in some ways the BBC resembles a PLC - it has commercial activities, employs thousands, and competes in domestic and global markets - it is at heart a public service institution, funded by citizens and with a democratic mission. As such the BBC is *sui generis*, which means that any governance reforms proposed for this Charter Review process must navigate several tensions arising from this singularly hybrid nature.

- **Independence** from government and political pressure on editorial and operational matters, against the need for **accountability** - but to whom, if not to ministers? Some suggest Parliament, others the public.
- **Expertise** is required by the Board across a range of highly technical areas - financial, legal, technological and editorial - but as a public service organisation, should the public have **representation** in its governance? And should the workforce be represented?
- **Long-term** - even Future Generations - thinking insulated from political pressure is crucial for a board taking strategic decisions, but the Board needs to be able to be **responsive** to an environment in which technology, media use and demographics are changing ever more rapidly
- **Clarity and efficiency** of governance was highly valued by the Clementi Review, but simplification came at the expense of full independence, and reforms may need to reintroduce an additional layer to ensure proper safeguards.

## Weaknesses in the BBC Board appointments process

Whatever the governance structures, they are only as effective and independent as the people within them. Reform of the BBC's Board appointments process is therefore fundamental to any broader effort to strengthen the Corporation's independence and accountability, and to ensure that the pool of potential candidates is strong.

The existing system for Board appointments exhibits several vulnerabilities. The Secretary of State retains significant control over appointments, and the broader public appointments process has been degraded in the past decade, with political considerations and openly preferred candidates increasingly superseding what should be public service criteria. As a result, political interference must be prevented more clearly and through multiple safeguards. (In this case, a new arrangement will need to be found to address the devolved nations and the English regions.)

90 Coyle, D. (2024), The Governance of the BBC. The Political Quarterly, 95: 20-24. <https://doi.org/10.1111/1467-923X.13382>

Of the five political appointees on the current Board - including the Chair -, some have apparent conflicts of interest, and are alleged to have pursued ideological agendas, including interference in editorial and in hiring - any system must firewall editorial clearly. Civil service-led procedures, while well-intentioned, may lack the specialist understanding required for an organisation as complex as the BBC. The workforce is currently not represented in governance or oversight, and efficient models for this exist, including the Mondragon model in Spain.<sup>91</sup>

There are wider and growing concerns that good candidates are increasingly declining to put themselves forward for diverse public service roles, including in the BBC's management and Board, due to adversarial zero-sum political discourse surrounding such roles, and related digital and physical harassment and intimidation.<sup>92</sup> The process for appointing Board members to Ofcom, given the attempts to politicise these in recent years, and given its current role as the BBC's external regulator, should also come under scrutiny.

## INSTRUCTIVE GOVERNANCE PRECEDENTS

Both experts and literature we have consulted agree that there is no perfect model for governance, and that each solution is flawed, and contains critical trade-offs in how information flows, who has authority, and the distinctive nature of public service organisations also operating in a commercial environment. While there is no off-the-shelf solution that can be applied to the BBC, there are instructive precedents elsewhere that suggest how specific governance challenges might be addressed:

- **The Judiciary** requires appointees that are rigorously independent from politics or political pressure. It has both the arm's-length Judicial Appointments Commission, which has transparent processes and criteria, and a statutory duty to reflect the diversity of the UK,<sup>93</sup> and the Judicial Conduct Investigations Office,<sup>94</sup> which provides accountability for conduct.
- The **Financial Conduct Authority** also addresses individual accountability, through the Senior Managers and Certification Regime,<sup>95</sup> which can investigate, sanction and disqualify individuals for breaches of conduct.
- **Charity trustees**<sup>96</sup> have legally enforceable duties to act in the charity's interests, rather than those of the appointing authority. Trustees can be investigated for breaches and removed by the Charity Commission. Given the BBC's unique model, its board members perhaps ought to have similar fiduciary obligations.
- **The National Gallery** has launched an initiative to create a Citizens' Panel of 50 members, to reflect on the Gallery's purpose, priorities and public value. The Panel will be facilitated by the public participation charity Involve, and the Sortition Foundation will lead on civic lotteries and recruitment of members.<sup>97</sup>

91 Rodríguez-Oramas, A., Burgues-Freitas, A., Joanpere, M., & Flecha, R. (2022). Participation and Organizational Commitment in the Mondragon Group. *Frontiers in psychology*, 13, 806442. <https://doi.org/10.3389/fpsyg.2022.806442>

92 This affects elected officials, charity trustees, journalists and other groups - and is disproportionately worse for women and those from ethnic or sexual minorities or with a disability. See for example: Speaker's Conference (2024). (2025, December). Final report: Ending abuse of MPs and candidates. UK Parliament. <https://committees.parliament.uk/committee/741/speakers-conference-2024/news/209904/speakers-conference-calls-for-urgent-action-to-end-abuse-of-mps-and-candidates/>; Local Government Association. (2024, August). Debate Not Hate: Survey of councillors, August 2024. <https://www.local.gov.uk/publications/debate-not-hate-survey-councillors-august-2024>; NCVO. (2024, December 11). Charities facing mission-limiting hostility, fear and intimidation [Report]. <https://www.ncvo.org.uk/news-and-insights/news-index/charities-facing-mission-limiting-hostility-fear-and-intimidation/>; Gorrell, G., Greenwood, M. A., Roberts, I., Maynard, D., & Bontcheva, K. (2025). Journalists are most likely to receive abuse: Analysing online abuse of UK public figures across sport, politics, and journalism on Twitter. *EPJ Data Science*, 14(1). <https://link.springer.com/article/10.1140/epjds/s13688-025-00556-8>

93 About us - Judicial Appointments Commission - <https://judicialappointments.gov.uk/about-the-jac/>

94 Judicial Conduct Investigations Office - <https://www.judiciary.uk/related-offices-and-bodies/judicial-conduct-investigations-office/>

95 Financial Conduct Authority - Senior Managers and Certification Regime - <https://www.fca.org.uk/firms/senior-managers-certification-regime>

96 Charity Commission - "Charity Trustee: What's Involved?" 3 May 2018 - <https://www.gov.uk/guidance/charity-trustee-whats-involved>

97 NG Citizens - the National Gallery invites the public to help shape its future (2025) - <https://www.nationalgallery.org.uk/about-us/press-and-media/press-releases/ng-citizens-the-national-gallery-invites-the-public-to-help-shape-its-future>

## PREREQUISITES FOR SECURING GOOD GOVERNANCE FOR THE BBC

There are foundational elements that need to be in place, regardless of the final governance model adopted, in order for it to command trust and legitimacy, and to function well:

**Independent appointments:** as noted in Chapter 3, an Independent BBC Appointments Commission should be established in statute rather than merely in the Charter. This Commission must have publicly transparent processes, and sole responsibility for nominating Board members. The government should have no role or input in its composition, or its decision-making, and should only be able to object to or veto candidates on a narrow range of grounds, carefully constrained to avoid inappropriate use. In order to ensure the right balance of cost-effectiveness and continuity, this body should have a small permanent secretariat, with the independent members stood up and down for specific periods and purposes as required, for example for a defined period in advance of the end of Board members' terms.

As an arm's-length body (ALB), its design should take account of the lessons of UCL Policy Lab's recent report on protecting ALBs in the UK from political capture.<sup>98</sup> It may be, as others have suggested<sup>99</sup> and as we note above, that this body should address appointments for the wider PSB system, including for Ofcom and Channel 4 (in which case it should be called the Public Media Independent Appointments Commission.)

**Clear and public declarations and duties by BBC Board members:** While a Hippocratic Oath for BBC Board members may not be realistic, they should be required to make a statutory and public declaration on appointment, committing to act in the BBC's interests and those of the public (not those of any appointing body), to protect editorial independence, and to adhere to the [Nolan Principles of public life](#), which are already part of the current BBC Board Code of Practice.<sup>100</sup>

**Board member performance and conduct evaluation:** There must be mechanisms for evaluating Board members' performance and investigating alleged breaches of conduct standards, or the aforementioned declarations. This requires an independent element with power to make findings and recommend consequences, including removal.

**Professional recruiters:** Executive search firms are already involved in senior BBC recruitment, and should support the independent appointments process, but their role must be carefully bounded. The Commission must determine the specification and criteria, and must make the final selection of candidates. The risk of established networks and echo chambers is considerable, and every effort should be made to identify and support candidates who would not otherwise put themselves forward.

**Citizen accountability (for more detailed proposals, see Chapter 5):** While the 'We own it, we should have a say in it' argument is compelling, citizen participation is focused here as a means to strengthen independence and accountability, not as an end in itself. It would serve as a bulwark against political capture or extremism whilst deepening public legitimacy and enabling better decision-making by leadership, and as a further lock on attempts to change the fundamental existence or character of the BBC.

There are widespread calls<sup>101</sup> for the BBC to incorporate Citizens' Assemblies into their governance (and other areas, in some proposals), and the Government has raised this as a

98 Pagel, C., McKee, M., Flynn, L (2025) - Strengthening the institutions: ensuring their effectiveness and independence - UCL Policy Lab - <https://www.ucl.ac.uk/policy-lab/news/2025/oct/uks-arms-length-public-bodies-are-highly-vulnerable-politicisation>

99 VLV Briefing on BBC Charter Renewal, 18 December 2025 - <https://vlv.org.uk/news/vlv-briefing-on-bbc-charter-renewal/>

100 BBC Board Code of Practice - [https://downloads.bbc.co.uk/aboutthebbc/insidethebbc/managementstructure/boardregsandpolicies/board\\_code\\_of\\_practice.pdf](https://downloads.bbc.co.uk/aboutthebbc/insidethebbc/managementstructure/boardregsandpolicies/board_code_of_practice.pdf)

101 E.g. VLV briefing (op.cit), British Broadcasting Challenge, Renewing the BBC (<https://britishbroadcastingchallenge.com/>), Prospect Magazine, Fixing the BBC (<https://www.prospectmagazine.co.uk/ideas/media/bbc-news/71818/fixing-the-bbc>), Common Wealth/Media Reform Coalition, Our Mutual Friend, (<https://www.common-wealth.org/publications/our-mutual-friend-the-bbc-in-the-digital-age>), British Academy Public service media: funding and governance options (<https://www.thebritishacademy.ac.uk/publications/future-of-public-service-media/>)



question in its Green Paper consultation document. We recommend a new requirement for citizens to be involved in the oversight of the BBC should be written into the Charter, reinforced through statutory means, and that the specific arrangements should be determined through the proposed Operational Agreement on an as-needed basis.

**A standing citizens' panel should be established** as an ongoing and permanent feature within the governance framework of the BBC to:

- Deliberate and provide judgements on key definitional questions such as periodic definitions of key terms and concepts such as 'the public interest'
- Deliberate on and provide responses and recommendations to the BBC's Strategic Priorities, Periodic Reviews, Annual Reports and other key and regular high-level processes
- Be able to provide responses to requests for deliberation from the BBC, Government, Parliament or Ofcom

This would be separate to Citizens' Assemblies that would be set up as part of the 'public lock' on the existence of the BBC recommended above, which would mitigate against fundamental threats to its independence, mission, purposes and foundational characteristics.

Broad principles that are now quite well-established, such as selecting members by sortition with stratification to ensure demographic and geographic representation, should guide the composition of the Panel. It should be established as a standing body with defined governance roles. The Panel provides democratic legitimacy without political control, representing the public without being subject to electoral pressures. The precise scope of the Panel's role - which we address in detail in Chapter 5 - can be adjusted to the final Board structure, but its existence as an accountability mechanism can be considered a prerequisite where ministerial oversight is removed.

## KEY RECOMMENDATIONS AND DESIGN CHOICES

### 4.1 Key recommendations

**4.1.1 Establish an Independent Appointments Process:** There is wide support<sup>102</sup> for establishing an Independent Appointments Commission for non-executive appointments to the BBC (and in one case the wider PSB system), operating at arm's length from the government in a manner analogous to the judicial appointments process. Such a body would work to transparent, published criteria for both expertise and representation. It would draw on multiple routes to source, vet and assess candidates, such as public nominations, civil society input, open recruitment, and professional headhunters operating to standards at least as rigorous as those expected for FTSE 250 boards. Final candidates could be required to publish election statements prior to appointment, and the process could incorporate cross-party scrutiny alongside civil service expertise where appropriate. This body should have a small permanent secretariat, with the independent members stood up and down for specific periods and purposes as required, for example for a defined period in advance of the end of board members' terms.

**4.1.2 Design and utilise expertise and representation criteria to inform selection:** Job specifications should require demonstrable expertise across the BBC's core domains, namely journalism across all platforms, technology, education, entertainment, civil society engagement, public service ethos, and public relations. Within these expertise requirements, the process should also ensure diversity of regional background, gender, socio-economic experience, minority representation and age.

102 E.g. VLV briefing (op.cit), British Broadcasting Challenge (op.cit.)

**4.1.3 Strengthen personal integrity requirements for board members:** Further strengthen the integrity provisions that require appointees to set aside other appointments, investments and positions that create conflicts of interest.<sup>103</sup> Clear conflicts procedures and safeguards - such as a Conduct Panel - should be established, supported by transparent declaration processes and ongoing monitoring throughout each member's tenure. Current and former politicians or elected officials with active political involvement in the last 10 years, and donors to them or their parties, should be ineligible.

**4.1.4 Strengthen independence in the BBC Board Chair selection process:** The Independent Appointments Commission should oversee the Board Chair appointment replacing the current process of Ministerial appointment. Several options exist for how this appointment could be made. The Chair might be chosen as first among equals in consultation with the appointed board members themselves,<sup>104</sup> or identified through the main appointments process and subsequently ratified by the Board. To complement this, a specific recruitment strand within the appointments process could also focus on identifying particular contenders for the Chair role. Depending on where appointments fall in the Board cycle and Chair term length, the Chair could also be involved in assessing candidate Board members to ensure Board cohesion, though this may raise questions about the independence of the wider appointments process.

## 4.2 Design choices for the BBC Board structure

The following options represent different responses to that structural question, and seek to balance simplicity and efficiency with public interest-oriented duties and safeguards that are more trust-like. Our preferred model, 'Supervisory Board Model' (4.2.1), takes its cue from Diane Coyle's paper cited above to propose a two-tier board that addresses the weaknesses of past analogous structures. We also include a possible 'middle-ground' and less transformative alternative to the (4.2.1) model: a Reformed Unitary Board which would offer a baseline response to fixing the status quo, by addressing independent appointments and more clearly firewalling editorial. The final Board component (4.2.2) adds a dimension of conduct regulation that could be associated with either Supervisory or Reformed Unitary Board model that is present in other critical institutions in society. In all scenarios, the Citizens' Panel detailed in Chapter 5 would provide strategic recommendations directly to the full Board, with mandatory public response, and justification for any deviations.

### Our preferred model

The Supervisory Board model best reflects the BBC's public interest role and character whilst maintaining some corporate governance characteristics.

**4.2.1 Supervisory Board Model:** Aligned with international good practice, e.g. with many continental Boards, and particularly in the German context (ARD), this option will be seen in some ways to reboot the Trust model, separating governance oversight from operational management through a two-tier structure:

**A Supervisory Board of 8–10 members**, appointed by the independent Commission, would set strategy, appoint and remove the Director-General, and approve major decisions. It would have no involvement in day-to-day operations or editorial matters, and the formal separation between governance and operations would be clearly delineated and defined in statute - this would be a crucial difference from the Trust era, and would need to be carefully done to avoid its pitfalls, such as blurring 'strategy' and 'editorial'. The role of Ofcom would also change to remove its governance role reviewing BBC performance which would now be done by the

103 BBC Board Code of Practice - [https://downloads.bbc.co.uk/aboutthebbc/insidethebbc/managementstructure/boardregsandpolicies/board\\_code\\_of\\_practice.pdf](https://downloads.bbc.co.uk/aboutthebbc/insidethebbc/managementstructure/boardregsandpolicies/board_code_of_practice.pdf)

104 James Harding, former Head of News at the BBC, advocated this (though replacing 'Ofcom' with the new Independent Appointments Commission), among other reforms to increase the independence of the BBC, in the 2025 MacTaggart Lecture: <https://observer.co.uk/news/national/article/truth-and-trust-are-in-trouble-its-time-for-an-independent-bbc>



Supervisory Board, to remove double/triple jeopardy over who is regulating or governing the BBC. Ofcom's role would be purely regulatory.

A **separate Executive**, led by the D-G, would be responsible for operations and editorial decisions, accountable to the Supervisory Board for performance but protected from its oversight of or interference in editorial judgments.

In this scenario, the Panel would interact with the Supervisory Board on strategy and appointments, with the Supervisory Board providing the firewall to operations.

**Alternative Board structure option: Reformed Unitary Board:** There may be pressure during the consultation process to maintain the current unitary Board structure, with select reforms, for reasons of continuity, simplicity and cost. This could be workable, if accompanied by meaningful reforms by transforming appointments and accountability, and if a method to create an air gap between governance and editorial were devised. All non-executive appointments would be made by the independent BBC Appointments Commission, with the Citizens' Panel endorsing the Chair appointment. The Board would still include a Senior Independent Director, who would now be responsible for liaising with the Panel and chairing any internal conduct processes. The appointment of the Director-General would be made by a nominations committee of non-executives, with the Chair playing a defined role in shaping Board composition. Further executive appointments would be made by the Director-General, consulting as required with Board members (e.g. the Audit Committee Chair over the appointment of the Group CFO).

#### **4.2.2 Introduce a BBC Governance Conduct Panel (a component of either Board model):**

One of the challenges that has emerged in the most recent crisis is a perceived lack of consequences for misconduct, in part due to the lack of a dedicated accountability mechanism attached to the Board. We recommend that, whether the next Board operates as a Supervisory or Reformed Unitary Board, it should be accompanied by an independent BBC Governance Conduct Panel - separate from government, BBC, and Ofcom, and analogous to the Judicial Conducts Investigations Office - with powers to investigate complaints about Non-executive Board members' conduct, to make the findings public, and to recommend removal or censure for serious breaches. This focuses on accountability for individual behaviour within the Board that threatens institutional integrity, without compromising institutional independence. The Board would continue to hold the Director-General and their team to account.

The Periodic Operational Review proposed in chapter 3 would have under its remit assessment of how the governance structure is performing, and to propose recommendations for how it might be adjusted, improved or reformed.

# EMBEDDING PUBLIC ENGAGEMENT AND CITIZEN PARTICIPATION

The previous two sections have set out the constitutional and governance reforms we are recommending to increase the BBC's independence. Both have referenced roles for public deliberation in renewed ways of working. In this final Chapter, we go into more detail about why the role of the public is important and how that public deliberation would work.

By ensuring that the British public has a meaningful voice and influence in the world's pre-eminent public service media organisation, we can increase both the independence and accountability of the BBC, and make the people of the UK, and not their temporary elected representatives, the true guardians of its existence.

## **OUR CASE FOR PUBLIC DELIBERATION IN THE CONSTITUTION AND GOVERNANCE OF THE BBC**

### **The gap in democratic legitimacy and public accountability for the BBC**

We have shown how the Charter Renewal process in recent decades has become increasingly fraught, and reduced to a politicised negotiation between ministers and BBC Board and Executive. This has set the BBC on its heels, and created an atmosphere and narrative that allows space and fuel for arguments that the BBC is remote, elite or biased and thus should be defunded or dismantled entirely.

As emphasised in Chapter 1, the BBC, uniquely among UK public institutions, is funded directly by the public, not by the government. It holds power to account in the UK on behalf of the public. It also bears universality obligations that make it, as we argue above, universally available, collectively-owned democratic infrastructure. The reforms we outline in the preceding chapters to strengthen the BBC's constitutional independence and accountability - making the Charter permanent to remove the periodic threat of closure of the BBC; ensuring that the BBC's

mission, purposes, independence and universality are protected in statute; making the process for determining the BBC's funding settlement independent and transparent; reforming the BBC's Board and governance framework to insulate it properly from political interference, and to make appointments genuinely independent - provide tried and trusted remedies to these weaknesses.

However, the question of how to centre the public, strengthen the collectively-owned BBC's democratic legitimacy and make it more resilient to political attack, remains.

As we have argued, while the 'We own it, we should have a say in it' argument for public participation is compelling, citizen participation is focused here as a means to strengthen independence and accountability, not as an end in itself. It would serve as a bulwark against political capture or extremism whilst deepening public legitimacy and enabling better decision-making by leadership, and as a further lock on attempts to change the fundamental existence or character of the BBC.

## Past approaches to engaging the public in BBC governance

The BBC does not operate in a vacuum. There have been many efforts to make it more public-focused, and to involve people, many have wrestled with the challenge of how to involve the public more directly and meaningfully in the BBC.<sup>105</sup> There has been considerable institutional discomfort in the past at the idea of involving the public in the governance of what is a highly complex organisation, and a presumption that this would adversely affect editorial independence, quality or efficiency.

As a result, experiments have tended to be project-based, timebound participation in content creation (e.g. pioneering initiatives like the BBC Domesday Project<sup>106</sup> or Video Nation<sup>107</sup>), broadening access to and participation in technology (such as the BBC micro:bit<sup>108</sup>) or trustee-led groups of audience members (like the Audience Councils that were closed with the 2017 Charter). In 2021, scholars Vanhaeght and Donders, examining the 'participatory turn' particularly in relation to content, concluded that [our emphasis]:

a more purposeful vision on participation requires another view on audiences as not only receivers but also participants in PSM. The latter is important and does not only touch upon participation in production, aggregation or distribution processes. In fact, one could argue this goes beyond the celebration of user generated content. It is about *how PSM organisations think together with that audience about what PSM is, how it should be governed and how it can be crystallised in reality*. This comes with a radically different approach starting from the needs of diverse audiences, which implies an openness, but also a vulnerability on the part of public broadcasters. Simplified: *public broadcasters need to let go of their monopoly over the public interest in media, sharing responsibility with citizens*.<sup>109</sup>

Others have tried to integrate citizen juries and other forms of direct involvement, but at the time the field of citizen deliberation was nascent and its benefits not yet widely evidenced or codified. The most recent example was an online citizens' assembly as part of Ofcom's 2020 consultation on public service broadcasting, *Small Screen: Big Debate*, which led researchers Giles Moss and Lee Edwards to conclude that "public deliberation is necessary to facilitate a collective public voice that can better justify governance decisions about public service

105 Coyle, D. - 'From service reviews to Audience Councils: how accountable is the BBC Trust?' - openDemocracy, 18 September 2012 - <https://www.opendemocracy.net/en/ourbeeb/from-service-reviews-to-audience-councils-how-accountable-is-bbc-trust/>

106 The Centre for Computing History - The BBC Domesday Project Emulator - <https://domesday.computinghistory.org.uk/>; BBC - 'Revisit the BBC's 1986 Domesday project' - 16 May 2011 - <https://www.bbc.co.uk/news/uk-england-beds-bucks-herts-13374981>

107 BBC - The Birth of 'Video Nation' - 15 October 2014 - <https://www.bbc.co.uk/videonation/history/birth.shtml>

108 BBC Bitesize - 'Everything you need to know about the BBC micro:bit' - <https://www.bbc.co.uk/teach/microbit/articles/zfig8p3>

109 Vanhaeght, A., & Donders, K. (2021). Audience participation in public service media. From an instrumental to a purposeful vision. adComunica. <https://researchportal.vub.be/en/publications/audience-participation-in-public-service-media-from-an-instrument/>

media.”<sup>110</sup> In a non-BBC media context, in 2022, the IWA, a Welsh public policy thinktank, collaborated with the Open University and the Sortition Foundation to select a Citizens’ Panel on the media in Wales.<sup>111</sup>

None of the past experiments with consultation and citizen involvement have been formally incorporated into governance, with actual powers. But, in contrast to 20 years ago, the field is now mature and growing, and methods are more tried and trusted.<sup>112</sup>

Diverse types of deliberative and participatory bodies - many with decision-making powers - are being used by governments, cities, museums, public bodies and other institutions, including in the UK, and it is no longer considered egregious, experimental or risky to do so. The methods for public deliberation have also expanded beyond the often presumed default of ‘Citizens’ Assemblies’ to Citizens’ Panels and juries, deliberative workshops and community conversations.<sup>113</sup>

### Current approaches and gaps in methods of public engagement at the BBC

The BBC currently has three main modes of engagement with the public:<sup>114</sup> 1, audience research through continuous measurement of consumption, digital analytics, perception surveys and other feedback, reaching millions of users; 2, direct dialogue and engagement, reaching thousands of participants through its Virtual In Person (VIP) Programme; and 3, formal consultation required by Charter related to material changes to the BBC’s public services activities or editorial standards.

These methods are industry-leading, demonstrate impressive scale, take note of geographic diversity, are largely systematic across the BBC’s services and platforms, and are exposing BBC staff to public views. These help understand how the BBC is reaching and serving different audiences, reveal gaps, and solicit transparent public and organised stakeholder input on significant regulatory and compliance issues. In addition to this, during 2025, the BBC conducted a large-scale survey - with over 870,000 responses - in preparation for the Charter Renewal process.<sup>115</sup> As noted in the Annual Report, the Board takes note of these insights in their decision making and sees the benefit in these insights to making the case for its ongoing protection. The BBC also makes audience insights available to contractors and partners.<sup>116</sup>

In the light of our argument in Chapter 1 that the BBC represents not just a media, cultural and technology organisation, but critical national infrastructure for our democratic and epistemic security, we believe that, while the BBC’s existing methods above are sophisticated, extensive and insightful, they are designed to be extractive (one-way), episodic, largely consumer-oriented, BBC-framed and insider-led.

Furthermore, we believe that these consultative mechanisms alone do not increase the BBC’s independence or democratic accountability, and nor do they provide sufficiently substantive insight on trade-offs that the BBC must make, or challenge its own framing. They are not designed for that purpose.

110 Moss, G., & Edwards, L. (2025). Public deliberation and the justification of public service media. *International Journal of Cultural Policy*, 31(3), 322–337. <https://doi.org/10.1080/10286632.2024.2342277>

111 IWA - Citizens’ Voices, People’s News: Making the Media Work for Wales - 17 November 2022 - <https://www.iwa.wales/our-work/work/citizens-voices-media-wales-report/>

112 Demos (2024) Citizens’ White Paper. <https://demos.co.uk/research/citizens-white-paper/>

113 For further details on these methods, see Demos, op.cit.

114 Note the BBC’s Annual Report pages 52-56 is particularly insightful regarding the BBC’s existing processes and scope for audience engagement. <https://www.bbc.co.uk/aboutthebbc/documents/bbc-annual-report-and-accounts-24-25.pdf>

115 BBC Media Centre - ‘Our BBC, Our Future questionnaire findings published’ - 16 October 2025 <https://www.bbc.co.uk/mediacentre/2025/our-bbc-our-future-questionnaire-findings-published>

116 E.g. through the BBC Audiences Portal (<https://www.bbc.co.uk/audiences>) and the Telescope tool for creators (<https://telescope.tools.bbc.co.uk/>).

In a context where our recommendations for constitutional and governance reform are adopted, the BBC's very existence is no longer periodically under threat, and if its funding settlement is determined through an independent, transparent and evidence-based process rather than through closed-door negotiation with ministers. This new context enables and necessitates the BBC to broach more fundamental questions in a more deliberative and open way.

## Our core recommendations for public participation

While many stakeholders and partners are calling for the BBC to include citizens more formally through various forms of structures, ranging from citizens' assemblies<sup>117</sup> to full mutualisation of the BBC,<sup>118</sup> we recommend what we consider to be the most precise, meaningful, effective and transformative step to take in this direction.

The government should write into the new Charter a requirement for the BBC to involve citizens, not only through consultation, but also meaningfully in its governance, and to reinforce and protect this through statute. It should establish, in collaboration with expert bodies, a consultation and design process to **enable the BBC to incorporate a standing deliberative body - a BBC Citizens' Panel - with defined constitutional authority within the BBC's governance framework**. This body should then be part of the Periodic Operating Review framework, which will allow it to be properly evaluated and evolved as appropriate - but with its existence and powers guaranteed in Charter and statute. It should also have an influence in funding settlements - a key point for governments to exert leverage over the BBC.

In addition, any fundamental changes to constitutional arrangements for the BBC, the Charter, or the laws that would undermine the future sustainability of the corporation, should be subject to the **"public lock" described above that would include a standalone BBC Citizens' Assembly**.

By integrating citizen involvement in the constitution and governance of the BBC, it is possible to strengthen the pathways for accountability and reform which are currently solely in the hands of the government, and help anchor decision making in the real world. Such a step would strengthen the BBC's independence from politics and its accountability to citizens, and thus both contribute to countering narratives of declining trust, and facilitate improved levels of trust in the institution.

But principally it's designed to strengthen the BBC's independence, acting as a bulwark against political pressures it might come under. For "good actors" on the Board, it gives them evidence that they are acting in the public interest where that becomes contested; for "bad actors" it creates a public interest yardstick they must measure up to.

## THE TWO CITIZENS' BODIES: AN ASSEMBLY, AND A STANDING PANEL

We are recommending two different citizen processes to underpin the constitutional and governance recommendations we have made.

One-off BBC Citizens' Assemblies would be part of the "public lock" - along with supermajorities in all four legislatures of the UK - that would be secured on any fundamental changes to the BBC's future as a result of Charter design, renewal or one-off government attempts to change or end them.

117 The British Broadcasting Challenge - Renewing the BBC: A New Charter for Britain and the World (October 2025) - <https://britishbroadcastingchallenge.com/>; Tambini, D - 'Constitutionalising the BBC' - The Political Quarterly, 24 June 2024 - <https://politicalquarterly.org.uk/blog/constitutionalising-the-bbc-2/>

118 Common Wealth and the Media Reform Coalition - Our Mutual Friend: The BBC in the Digital Age - 08 May 2025 - <https://www.common-wealth.org/publications/our-mutual-friend-the-bbc-in-the-digital-age>

A standing BBC **Citizens’ Panel** made up of a representative and periodically-refreshing group of citizens would be established as a companion to both the Board and decisions relating to the operational agreements. The Panel would have defined and bounded powers and responsibilities, and a two-way relationship of structured dialogue with the Board.

The Citizens’ Assemblies would be designed as a hard decision-making authority in response to a threat to the future of the BBC. They would have a veto on fundamental changes to the BBC’s constitution. The Citizens’ Panel would be a “comply or explain” mandate - with the government in respect to agreeing the Operational Agreement, and the BBC Board with respect to strategic governance decisions. Each would be compelled to publish a comprehensive response including both where they will comply with the inputs from the Citizens’ Panel, and justify their decision not to. The decision to opt for a “comply or explain” model instead of a harder - such as ‘binding’ - decision-making power ensures both that the Board’s decision making is anchored in public judgement, while clearly preserving its institutional and fiduciary accountability for oversight of the BBC.

### The Assemblies’ and Panel’s relationships to the public: embodiment of universality

Because both the Assemblies and the Panel are constituted through sortition and stratification (see definitions below), rather than election or appointment, they cannot be accountable in the traditional sense of performance management i.e. they cannot be recalled or fired. The Panel and the Assembly do not act on *behalf* of the public; they temporarily *embody* the public for a specific constitutional purpose. Their legitimacy - and their defining value - therefore rests on the integrity, fairness and quality of the selection process, evidence-taking, facilitation, deliberations and outputs.

**TABLE 3**  
DEFINITIONS FOR KEY DELIBERATIVE DEMOCRACY TERMS, SORTITION AND RANDOM STRATIFICATION

<b>SORTITION</b>	‘Sortition’ describes the random selection of participants for decision-making bodies like Citizens’ Panels and Assemblies. It uses a democratic (or ‘civic’) lottery to create a representative sample of the population e.g. 40 or 100 people. <sup>119</sup> This is typically done by sending letters to households or people selected by lottery from a relevant address database. Everyone should have an equal chance of receiving an invitation. From those that respond, a representative sample is drawn (using random stratification - defined below) creating a microcosm of a community in terms of age, gender, location, socio-economic proxy.
<b>RANDOM STRATIFICATION</b>	Random stratification is a sampling method where a population is first divided into distinct, non-overlapping subgroups based on their shared characteristics e.g. age, gender, income. Then a random sample is taken from each subgroup to form the final sample. <sup>120</sup>

119 Sortition Foundation (2026) “How” <https://www.sortitionfoundation.org/how>  
 120 DemNext (2026) “Assembling and assembly guide.” <https://assemblyguide.demnext.org/before-the-assembly/#the-sortition-process-selection-by-lottery-and-stratification>

## What would these bodies do, and what powers would they have?

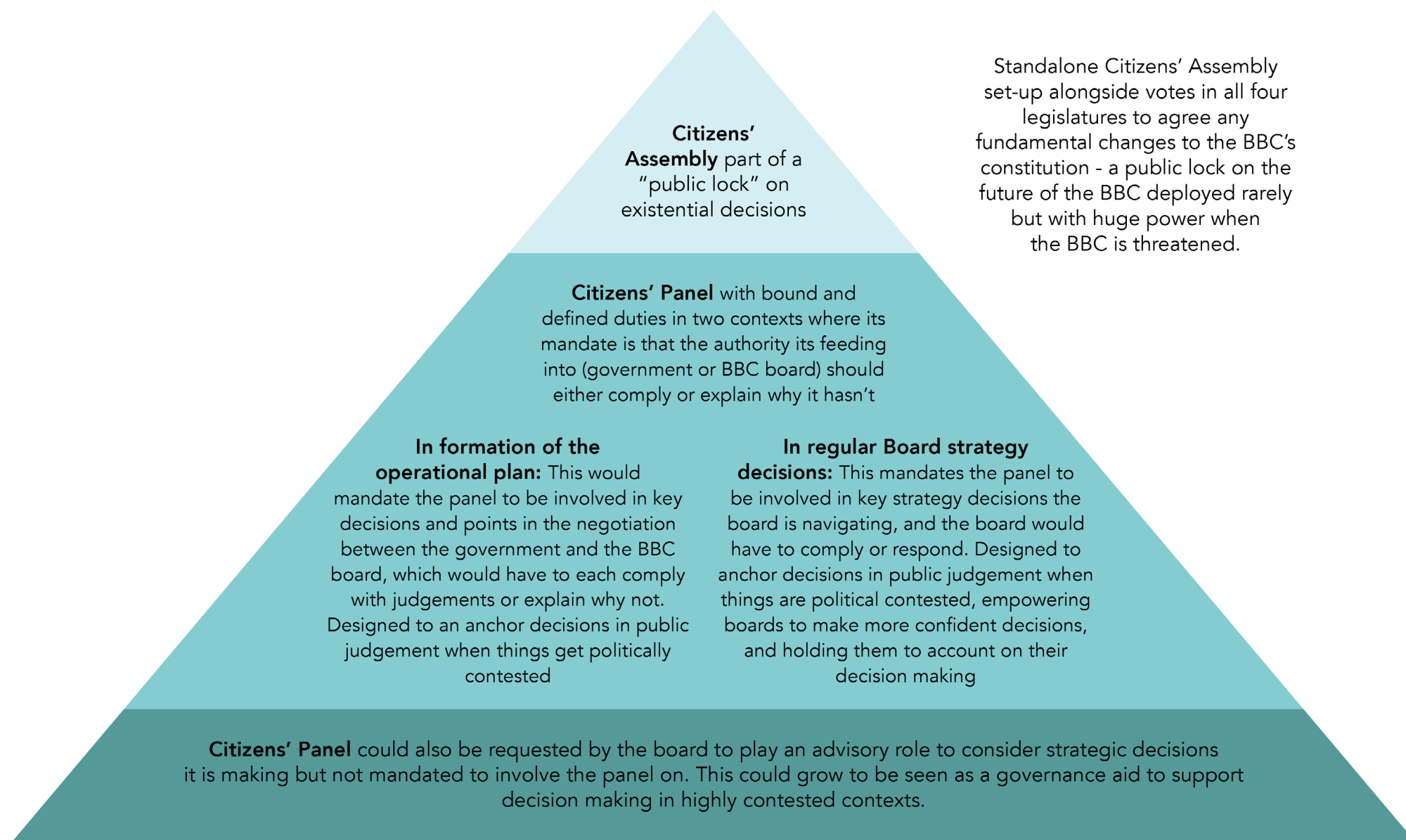
The diagram and table below show how the Citizens' Assemblies and Citizens' Panel we proposed - under the new Charter, review and governance framework we outline above - would interact with the Board and government. The Panel would have different recommendation and decision-making force depending on the specific function. We use the following shorthand within this table to articulate these differences:

- **The 'public lock':** The assembly's response is Advisory - if it declines to approve a proposed change, a supermajority in the house would prevail in the decision making but it would create a powerful point of accountability and scrutiny to the decision rooted in the public.
- **Comply or explain:** The Board or government would not be forced to implement the panel's recommendations, but where it didn't it would have to explain why. This is a corporate governance/regulatory term<sup>121</sup> analogous to a range of terms in deliberative democracy (e.g. 'the government must provide a response, indicating a timeframe for implementation'.)
- **Advisory (optional):** The Panel makes recommendations to the Board, to which the Board will publish a response, but the Board retains the final authority. These are at the request of the Board where it is seeking additional guidance to inform its decision making.
- **Excluded:** The Panel has no role in this area.

<sup>121</sup> Corporate Governance Institute - What is 'Comply or Explain'? - <https://www.thecorporategovernanceinstitute.com/insights/lexicon/what-is-comply-or-explain/>



**FIGURE 3**  
A NEW APPROACH TO CITIZEN ENGAGEMENT IN BBC GOVERNANCE





## TABLES 4 AND 5

### SUMMARY OF WHEN THE CITIZENS' ASSEMBLIES AND CITIZENS' PANEL WOULD BE DEPLOYED, AND HOW

**Citizens' Assemblies:** formed for one-off decisions about fundamental questions of constitution and the future of the BBC. These would happen rarely, such as if the government is intending to implement a perpetual charter, at Charter Renewal if it doesn't, or if a government attempts to change the law to undermine the charter. Reports from two separate Assemblies, three years apart, would be required to be tabled before Parliament, in order for a parliamentary vote to take place. These Reports would be advisory rather than binding, leaving the sovereignty of Parliament intact, but high-profile and influential.

FUNCTION	CURRENT ROLES	HOW IT WOULD WORK
<b><i>Deciding Charter Mission and Purposes</i></b>	The Board enters negotiations with the government in the Charter Renewal process	Key decisions about the BBC would be put to a standalone Citizens' Assembly convened for this process. Prior to votes in the four legislatures of the UK, the Citizens' Assembly would be constituted and would be required to provide a first Advisory Report within a period of three years that would be tabled before Parliament (cf ICO, Ofcom). The government would need to respond to the Report, triggering a second Assembly that would be required to provide a second Advisory Report, three years later. At this point, supermajorities would then be required in all four legislatures of the UK to make any fundamental changes to the BBC. Currently this would happen in the Charter Renewal process, or as required under permanent Charter
<b><i>Any changes to the Charter that would compromise its future existence under perpetual Charter</i></b>	Protect through ongoing governance	As above, this would be compelled to happen if a government attempted to change the law around the Charter to remove it, fundamentally threatening the future of the BBC. The government could still choose to pursue this but would have to secure super-majorities in all four nations and the endorsement of the Citizen's Assembly

## THE CITIZENS' PANEL - STRATEGY

### OPERATIONAL REVIEW

Function	Current Board Role	Citizens' Panel Role	How they interact	Frequency
<b><i>Long-term strategy in operational review</i></b>	Sets strategic direction	Makes recommendations on priorities and direction into the government/Board negotiations	Comply or explain (both Board and government)	Currently at renewal and review - or at cycle of Operational Review defined by permanent Charter

## THE CITIZENS' PANEL - STRATEGY

### OPERATIONAL REVIEW

Function	Current Board Role	Citizens' Panel Role	How they interact	Frequency
<b>Terms of Operational Review</b>	N/A (new mechanism)	Inputs on terms, scope and questions	Influences framework for Review by IFC	Every 6-8 years, according to new Charter arrangements

### BOARD STRATEGY

<b>Annual strategic priorities</b>	Approves Annual Plan <sup>122</sup>	Makes recommendations on annual priorities, published in Annual Plan	Comply or explain in Annual Plan	Annual
<b>Material changes to public service activities</b>	Sets policy	Makes recommendations	Comply or explain	As required
<b>Commercial strategy and governance</b>	Sets strategy and arrangements	Review how commercial activities support public service mission and makes recommendations	Advisory (optional)	To same cycle as Long-term Strategy above
<b>Budget allocation principles (e.g. Nations and Regions)</b>	Allocates budget	Makes recommendations on high-level principles and priorities	Comply or explain	Three-year budget period, or as required
<b>Annual budget and accounts</b>	Sets and publishes	Included within response to Annual Report noted below	Advisory (optional)	Annual

### FUNDING

<b>Funding settlement (i.e. level of Licence Fee)</b>	Set by government	Makes recommendations to IFC, e.g. 'What constitutes value for money?'	Input to IFC process - which must comply or respond	Funding settlement period, as defined by new Operational Review mechanism
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122 About the BBC Annual Plan - <https://www.bbc.com/aboutthebbc/reports/annualplan>

## THE CITIZENS' PANEL - STRATEGY

### FUNDING

Function	Current Board Role	Citizens' Panel Role	How they interact	Frequency
<b>Funding mechanism</b>	No current role (determined by government, implemented by executive)	Deliberates on potential mechanisms and makes recommendations to government, BBC and IFC	Relevant bodies must comply or explain	As required

### PERFORMANCE AND ACCOUNTABILITY

<b>Annual Report</b> <sup>123</sup>	Publishes (assesses how BBC has delivered on Annual Plan)	Makes responses that are published within report	Panel considers draft of report and contributes a response	Annual
<b>Performance framework</b>	Sets framework	Makes recommendations on definitions of 'success'	Advisory (optional)	3 years

### EDITORIAL AND OPERATIONS

<b>Creative remit, editorial output, programming, complaints, operations, etc</b>	Varied responsibilities	No role (unless specifically requested by Board or Executive, e.g. Advisory on high-level retrospective editorial coverage questions)	Excluded (unless specifically requested by Board or Executive for advisory, non binding input)	-
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## Why public engagement in the BBC matters for its independence and accountability

Embedding citizens directly into the governance of the BBC is a key part of addressing two profound and intensifying challenges that it will face in its second century: how to govern and maintain the democratic legitimacy of critical public institutions, and how to protect our information ecosystem from political or ideological capture.

As emphasised in Chapter 1, the BBC, uniquely among UK public institutions, is funded directly by the public, not by the government. It also bears universality obligations that make it, as we argue above, universally available, collectively-owned democratic infrastructure. Yet, as recent events have shown, its governance remains structurally vulnerable to political interference through ministerial appointments to the Board, leverage over funding settlements, and outsized pressure during Charter and Mid-Term Review cycles. Furthermore, every current formal accountability mechanism for the BBC and pathways for its reform ultimately flows back to the

123 About the BBC Annual Report - <https://www.bbc.com/aboutthebbc/reports/annualreport>

government of the day as a proxy for the public. As such, there is no alternative centre of gravity that can articulate the public interest independent of the government or of the BBC's leadership.

This Charter Renewal consultation in 2026-27 opens a window for genuine structural change, with public engagement in the BBC's governance explicitly under consideration by the government. In our view, citizen involvement in the governance of the BBC should be integrated into the Charter, protected in statute, and delivered through the careful design of a Standing Citizens' Panel that further strengthens independence and accountability, improves decision making by BBC leadership, and protects editorial freedom.

In the Green Paper, the government states that it will "consider the merit of more explicitly requiring the BBC to start utilising other deliberative or consultative forums, such as Citizens' Assemblies, as a way to enhance the level of engagement between the public and the BBC." However, there is a critical distinction between consultative exercises and governance mechanisms with actual power. What ultimately prevents deliberative forums from becoming 'talking-shops' is not the quality of their design or deliberations, but the formal authority they hold in the governance structure. Ensuring that such a deliberative body has actual weight and powers is key to determining whether it enhances the independence and accountability of the BBC or not.

**TABLE 6**  
DIFFERENCES BETWEEN CITIZENS' ASSEMBLIES AND CITIZENS' PANELS

MODEL / OPTION	PROS	CONS	FORCE OF DECISIONS
<b>Citizens' Assembly - Time-limited or issue-specific</b>	Focused; deliberative; visible; well-suited to resolving specific issues; may be acceptable interim / pilot approach; end of deliberation is not end of the assembly (response and dialogue period)	Episodic; no institutional memory; instrumental rather than structural or as a standing safeguard; limited impact beyond narrow remit	Consultative with moral and reputational weight. Outputs may influence decisions on specific issues, and perhaps cultural acceptance of citizen input, but no ongoing authority, especially without requirement for formal response
<b>Citizens' Panel - ongoing or permanent, with constitutional status</b>	Permanent status confers legitimacy; high epistemic quality; standing counterweight to executive power; strengthens independence and accountability; incarnates idea of universality in governance of public service media	Higher cost; greater complexity; requires careful design and management (by third-party/host) and statutory protection; need clarity of remit, boundaries of powers and responsibilities	Deliberative constitutional authority. Defined powers include responses, and public locks on foundational changes

We are recommending a Citizens' Panel for the ongoing input into governance decisions and a separate standalone Citizens' Assembly for constitutional questions to ensure that the latter are the purest version of deliberation.

### Why involving the public through deliberative bodies improves decision-making

Researchers such as Niemeyer et al (2024)<sup>124</sup> demonstrate that demographically representative groups, given adequate time and balanced information, exhibit “deliberative reason” when asked to consider complex issues. There is substantial and growing evidence of the quality of decision-making arrived at through similar processes and bodies around the world.<sup>125</sup> Including this within the governance framework will provide the BBC's leadership with higher-quality evidence with which to make the decisions for which it is accountable.

The Panel is constitutive of the public through sortition - it is an embodiment of universality. If given clear authority and powers, as we recommend above, it cannot be ignored because, instead of being a delegated representative body, a selected Board or expertise-based body, it literally **is** the public. But as it does not have delegated authority, it cannot be accountable for the decisions it takes, however high their quality.

While a professionally-recruited or -appointed Board may be highly-skilled, it is likely to be more homogeneous in status, networks and background, and in its expertise in the technicalities of the BBC's operations. A standing Citizens' Panel would include among its members people with diverse perspectives, life circumstances, information needs and lived experience - including of the BBC and its services - that would enhance the quality of their deliberations, and that such Boards, and the appointments processes selecting them, would not be able to encompass.

The constitutional case centres on citizen involvement as a bulwark or counterweight against political capture or extremism. This will deepen the BBC's democratic legitimacy with the public, and will provide a further ‘public lock’ on attempts to change the mission, independence or purposes of the BBC.

This will raise the political and practical cost of attempted interference in the BBC by a government or a hostile actor - for example to undermine or weaken the BBC's independence, funding adequacy, universality or other core aspects - by requiring that it has the Panel's consent to any changes to these or other foundational provisions, or anything that risks weakening them.

### Distinguishing citizen engagement from audience research and consultation

Embedding a standing Citizens' Panel into the governance framework serves a function that is clearly distinct from audience research. Audience insight work is typically one-way and interpretive in that it gathers behavioural data and top-of-mind opinions which the institution then weighs and applies. A deliberative body like a standing Citizens' Panel, by contrast, is *constitutive*: it is imbued with power. It brings together a demographically representative group of citizens, selected through the process of sortition (e.g. civic lottery) and stratification (to ensure demographic representation), provides them with time, evidence, and independent facilitation, and asks them to deliberate together to form informed collective judgements mainly

124 Niemeyer, S., Veri, F., Dryzek, J. S., & Baechtger, A. (2024). How Deliberation Happens: Enabling Deliberative Reason. *American Political Science Review*, 118(1), 345–362. doi:10.1017/S0003055423000023

125 General research and resources includes: OECD - Innovative Public Participation - <https://www.oecd.org/en/topics/sub-issues/open-government-and-citizen-participation/innovative-public-participation.html>; Democracy Next - Resources - <https://assemblyguide.demnext.org/resources>; Involve UK - Knowledge Base - <https://www.involve.org.uk/resources/knowledge-base>; the Sortition Foundation - Citizens' Assembly - [https://www.sortitionfoundation.org/citizens\\_assembly](https://www.sortitionfoundation.org/citizens_assembly); Demos - Collaborative Democracy - <https://demos.co.uk/our-approach/a-trusted-political-system/>. Specific models we have studied include: the permanent Citizens' Council and Assembly in the Ostbelgien model (<https://www.buergerdialog.be/en/> / <https://oidp.net/en/practice.php?id=1237>), the Paris Citizens' Assembly (<https://oidp.net/en/practice.php?id=1388>), the UK Citizens' Assembly on Climate Change (<https://oidp.net/en/practice.php?id=1258>) and the Citizens' Assembly of Scotland (<https://oidp.net/en/practice.php?id=1290>)

on questions of stewardship, principles, values and long-term direction, as well as short-term actions such as policy recommendations.

The following table highlights the key differences between a Citizens' Panel as a component of the BBC's governance structure from other methods of audience research and consultation:<sup>126</sup>

**TABLE 7**

KEY DIFFERENCES BETWEEN DELIBERATIVE BODIES, SUCH AS CITIZENS' PANELS, FROM AUDIENCE RESEARCH METHODS

	CONSUMER INTELLIGENCE	OPINION MEASUREMENT	STAKEHOLDER CONSULTATION	USER CO-DESIGN	DELIBERATIVE BODIES E.G. CITIZENS' PANELS
<b>Examples</b>	Audience Insights, analytics, VIP sessions	Opinion polling, 'Our BBC, Our Future' survey	Public Interest Test consultations, Editorial Guidelines review	User research, usability testing, prototyping	Citizens' Panels, sortition panels with sustained deliberation
<b>Fundamental logic</b>	Understanding preferences to increase relevance and reach	Measuring attitudes at a point in time	Securing legitimacy for decisions through transparency	Improving products through iterative feedback	Enabling informed citizen judgement to guide governance
<b>Who is 'the public'?</b>	Audience segments / consumers	Representative sample / weighted population	Interested stakeholders (self-selected)	User segments / personas	Randomly selected citizens (civic lottery)
<b>What question does it answer?</b>	'What do people currently want and use?'	'What do people think about X right now?'	'Do stakeholders support our proposal?'	'Does this work for users?'	'What should we do and why?'
<b>Type of knowledge produced</b>	Behavioural, experiential, preference-based	Attitudinal snapshot	Stakeholder positions, perceived legitimacy	Experiential, design-oriented, usability-focused	Deliberative, normative, value-based
<b>Power relationship</b>	Institution extracts insight from audiences	Institution measures opinion	Institution solicits feedback on predetermined options	Users influence product development	Citizens shape institutional direction with authority

126 For a full elaboration on the key differences between participatory approaches and research methods, see Demos (2024) Citizen's White Paper. [https://demos.co.uk/wp-content/uploads/2024/07/Citizens-White-Paper-July-2024\\_final.pdf](https://demos.co.uk/wp-content/uploads/2024/07/Citizens-White-Paper-July-2024_final.pdf)

	CONSUMER INTELLIGENCE	OPINION MEASUREMENT	STAKEHOLDER CONSULTATION	USER CO-DESIGN	DELIBERATIVE BODIES E.G. CITIZENS' PANELS
<b>What changes?</b>	Content/service offerings to match demand	Institutional awareness of public attitudes	Specific proposals (within bounded scope)	Product/service design and experience	Strategic priorities, governance frameworks, value trade-offs
<b>Source of legitimacy</b>	Market responsiveness / audience satisfaction	Statistical representativeness	Procedural transparency / public record	User satisfaction / improved experience	Democratic process + informed judgement
<b>Typical scale</b>	Large & continuous (millions)	Large & episodic (thousands)	Open & episodic (thousands)	Small-medium & iterative (dozens-hundreds)	Small & bounded (80-150 people)
<b>Time horizon</b>	Ongoing / real-time	Single point in time	Fixed consultation window (weeks-months)	Project lifecycle (weeks-months)	Sustained engagement (months)
<b>When to use</b>	Understanding current behaviour and preferences for content/service optimisation	Measuring public sentiment on specific issues or tracking trends over time	Regulatory/Charter requirements for major service changes; building legitimacy record	Iterative improvement of existing products/services; testing new features	Contested value trade-offs, governance frameworks, strategic direction setting, constitutional questions
<b>What it cannot do</b>	Reveal what people need (vs. want); address collective action problems; handle value conflicts	Explain why people hold views; handle complexity; generate informed judgement	Enable genuine co-design; ensure informed (vs. initial) views; build democratic authority	Address political/governance questions; generate democratic legitimacy; handle competing public interests	Provide continuous feedback; scale to millions; deliver quick insights; replace technical/creative expertise



## RECOMMENDATIONS: PRINCIPLES, TECHNICAL DESIGN CHOICES AND ROUTE TO LAUNCH

While there is practiced precedent in establishing Citizens' Assemblies in the UK and around the world, there is less information about setting up a standing Citizens' Panel to act as the sounding board to a governance Board as described above. In this section of the paper, we address the core principles, design choices, prerequisites and practicalities that should underpin the creation of such a Panel in order for it to facilitate meaningful public engagement. We also outline how this body should be designed, and what its remit should be.<sup>127</sup>

The consultation and design of a body of this type will involve discussion and debate from a variety of stakeholders, including deliberative democracy practitioners experienced in establishing and managing such bodies at different scales. Various aspects will need to be examined in order to decide on the nature, size, budget, location and other considerations for the eventual Citizens' Panel.

In the sections that follow, we set out briefly: (5.1) core principles that the design of any resulting Panel will need to adhere to, (5.2) options that are more technical design choices, and (5.3) considerations for an approach to launching the Panel including timelines. In each of these sections we also offer our recommended solution.

### 5.1 Core Principles

The following elements are core elements that are considered by deliberative experts as essential to the Panel's legitimacy.

**5.1.1 The Citizens' Panel should have a clearly-bounded remit:** The Panel has a clearly bounded and defined remit and specific responsibilities to provide recommendations and judgements as elaborated in detail in the table above:

- Strategic and budgetary matters on which the Board holds authority
- Inputting into operational planning and funding decisions.
- Performance and accountability matters in which the public's voice is not represented directly
- Its remit should **not** cover editorial or operational matters, including commissioning, scheduling, content, HR, individual complaints, and journalistic matters, in order to protect the BBC's editorial and operational independence

Traditionally, it should be permitted to set its own agenda within this remit, including being called for evidence and witnesses, and, with the support of the expert secretariat and, perhaps, the BBC Board's Senior Independent Non-Executive Board member, determining questions on which it feels it appropriate to deliberate. The Board and other bodies, such as the Secretary of State, Parliament (e.g. Committees), Ofcom, or other bodies may refer other matters to it.

**5.1.2 The Citizens' Panel should have meaningful powers:** As noted in the table above, the Panel's powers related to its recommendations and judgements are graduated as follows:

<sup>127</sup> For a description of how sortition and stratification processes work, see the Appendix. The sections that follow draw on a range of sources, including the OECD, Democracy Next, Involve, the Sortition Foundation (including the IWA citizens' panel on media in Wales) and Demos' own work. Examples we have drawn on for inspiration at this discussion stage include the permanent Citizens' Council and Assembly in the Ostbelgien model, the Paris Citizens' Assembly, the UK Citizens' Assembly on Climate Change and the Citizens' Assembly of Scotland.

- **Comply or explain** - areas where the Board - or other defined body - must accept and implement the Panel's recommendations, or publish an explanation of why it will not
- **Advisory** - areas where the Panel can provide recommendations, and to which the Board or other body must respond, but on which they retain decision-making authority
- **Excluded** - an area where the Panel has no say such as on the BBC's creative remit, editorial output, programming, complaints, operations, etc, but where the Board or Executive may refer specific high-level questions to the Panel

**5.1.3 The Citizens' Panel must be constitutionally embedded and protected:** In order to create a Citizens' Panel that has constitutional weight and permanence, as we have explained, three specific constitutional, statutory and governance reforms are required: **new wording in the Charter** to establish the high-level purpose requiring the BBC to involve citizens in its governance; **statutory protection** to ensure that any body created to do this is distinct from the Board and the Government and cannot be easily dissolved, and to define its powers; and, once designed, **incorporation of the Citizens' Panel into the Periodic Operational Review** defining the parameters and methods by which it will operate and be assessed.

**5.1.4 The Citizens' Panel host should have operational independence at arm's-length from the BBC and government:** In order to ensure that the Citizens' Panel is properly independent of the government and of the BBC, in the first five-year period, a public tender should be issued for a third-party organisation (e.g. a deliberative democracy organisation from the UK or abroad with demonstrable experience and expertise) to set up and support the Citizens' Panel. This host will be responsible for conducting the sortition and stratification processes, providing the Panel with balanced evidence, research and witnesses, managing the logistics of deliberation, ensuring high-quality facilitation of the deliberative sessions, and publication of the sessions and outputs (such as recommendations and judgments). Additional provision should be made within the BBC's funding settlement to properly resource this independent and autonomous work.

This host organisation could also be responsible for incorporating and managing any one-off Citizens' Assembly processes, for which contingency budget provision should be made in the associated Operational Review.

For this first five-year period, the Panel should leave scope for an Independent Chair position, which would be appointed through the Independent Appointments Commission, with the role and parameters defined, and recruitment criteria advised on, by the host organisation and the steering committee. This, like other aspects of the Panel, would be assessed and amended through the Operational Review.

The host organisation should be overseen by a steering group of diverse composition, including deliberative democracy practitioners and experts and, over time, former Panel members (as in Ostbelgien). It may be that a statutory body is established after this, as part of an Operational Review.

## 5.2 Design principles

The designers of the BBC Citizens' Panel will need to use established techniques and methodologies to shape the final body, within agreed parameters and budgets, which will involve a series of tradeoffs. In addition to the core design principles outlined above, there are other areas of the Panel's design and parameters on which there should be consultation and debate during the Charter Renewal process. These include:

**5.2.1 Sortition and stratification:** As explained above, sortition and stratification are now well-established techniques that will enable the selection of a group of members that effectively embody the UK public. Because the BBC has a universality obligation, it is likely to mean use of a UK-wide 'civic lottery' (which the BBC can advertise widely to reinforce its legitimacy and reach) to approach potential members, who must respond to the invitation stating their interest, yielding ideally a large and diverse pool of potential members. There should be robust and transparent stratification within this pool to select the actual members, ensuring demographic, political and geographic diversity.

Those overseeing the sortition process should be aware of the risk of groups trying to influence, engineer or exploit involvement in the Panel, for example through the spreading of mis-, dis- or malinformation related to the process to distort, discourage or discredit public participation in it.

**5.2.2 Size of membership of the Panel:** The designers of the Panel must choose between a smaller, less representative, less diverse membership that is more manageable and less costly, and a larger membership with greater diversity and representativeness that is more complex to facilitate and more costly to run. In the latter case, it may be possible to design in sub-groups for specific challenges or regions.

**Recommendation:** We believe that, based on examples like Paris, 100-120 total members is a suitable size for a UK-wide institution.

**5.2.3 Term-length and renewals, and deliberative quality:** Setting term-lengths at one year risks giving members insufficient time to develop understanding of the issues, and raises the cost of onboarding members and of handover of institutional expertise. It may however be easier to persuade them to take on the commitment, and will lead to a higher turnover of perspectives. Setting at three years risks institutionalisation, deep expertise, and loss of lay perspective and therefore of credibility. Assemblies sometimes permit renewal, but only after an interval of e.g. 4 years. In Ostbelgien, the Council is made up of those who have previously served on the Panel.

**Recommendation:** We believe that in the first phase at least, two-year terms, staggered with overlapping cohorts of 50-60 members entering and exiting respectively each year, to balance continuity and refreshing of perspectives, offers the best balance.

**5.2.4 Advisory architecture:** The Panel must have the power and resources to be able to call for evidence and witnesses, commission targeted research and other inputs. These provide ancillary checks and balances, and transparency of inputs, while helping to preserve the "lay mosaic of interests" of the Panel. These parameters should be consulted on and debated through the design process, and refined through the host organisation, with the support of the steering group, once appointed.

**5.2.5 Accessibility, equity and inclusion:** To avoid the risk of being dominated by those with leisure time and resources, and to reflect the weight of responsibility, the Panel must have the resources to offer remuneration, travel expenses, care costs, accessibility support, and other accommodations to ensure truly equitable participation and genuine representativeness across the full spectrum of civic life.

**5.2.6 Time requirements, and format and cadence of meetings:** Members appointed to the Panel must have adequate time to be able to listen, deliberate and discuss in order to make considered judgements. For an institution the size and complexity of the BBC, and with a

standing body of 100-120 members, this would suggest 4-6 full weekends a year. Assembling 100-120 people from all parts of the UK a number of times a year, whether in-person, in hybrid form or online only will have logistical and accessibility challenges and costs, no matter which method is chosen. It may be possible to mix in-person collective and regional meetings, with a backstop of an online platform, in order to manage costs and accessibility and availability challenges. In general, in-person meetings are felt to have a higher quality of deliberation - although Demos' own work on the Waves initiative has emerging lessons for technologically-mediated deliberation.

**Recommendation:** Until two cycles of members have passed through and there is sufficient data and feedback to begin to evaluate and to adjust training and onboarding, we believe that the Panel should hold four weekend sessions in person, with less costly regional induction meetings, and pre- and post-Panel sessions online. These should not be quarterly, but should be to a schedule that permits members to maintain some continuity of engagement with the issues (e.g. over 2-4 months).

### 5.3 Timeline and prerequisites for launch

We recommend that the Citizens' Panel is launched using the following timeline:

- **Year 1** - Establish design and remit, appoint steering group and begin contracting for host organisation
- **Year 2** - Appoint host organisation, recruit cohort 1, pilot stage to test and learn, issue public report
- **Year 3** - Recruit cohort 2, begin full Panel remit, exit pilot stage
- **Year 4** - Exit cohort 1, recruit cohort 3, begin decision process for statutory body, evaluate ahead of Operational Review.

Elements that will need to be in place for the Citizens' Panel to be able to launch include i.e. in 'Year 1' include:

- **Legal foundations:** In the Charter, to establish the principle of citizen involvement in governance and its core functions (without specifying the exact shape of the body); statutory protection to ensure that the body cannot be dissolved at will by a minister or the BBC; and in the successor to the BBC Framework Agreement and Mid-Term Review to specify the actual parameters and details of the Panel and how it will work, be resourced and be evaluated.
- **Governance reforms:** Independent Appointments Commission, Independent Funding Commission and revised Board structure: more pressing reforms to protect the BBC from political interference. After this, the relationships and protocols between the Panel and other bodies can be better designed.
- **Consultation and design process:** to ensure a robust pilot structure, budget and to lay the groundwork for recruitment of members, induction and logistics.

# CONCLUSION

The UK faces a democratic emergency. The deliberate erosion of institutional norms, the rise of information warfare, and the concentration of media and platform power in unaccountable hands have placed epistemic security - our collective ability to know and trust what is true - at the heart of national security. In this context, the BBC is not simply a broadcaster.

Our BBC may be known as Auntie, but it is not a precious heirloom to be dusted lightly every ten years - it is the living, breathing heart of our information ecosystem and the backbone of our information supply chain. It is our only media and technology organisation that has universality of access, appeal, usage and funding, in its very DNA - its role is to serve us with information, education and entertainment, ad-free, in a world where our every email, click, view, emoji, transaction is valuable data for someone to target or surveil us.

Yet the very arrangements designed a century ago to protect the BBC have become its greatest vulnerabilities. The ten-year Charter cycle that used to provide a moment of review and accountability now acts as a Sword of Damocles, incentivising rather than deterring political interference. Ministerial control over appointments and a lack of transparent processes for the funding settlement creates continual uncertainty and chills editorial freedom. The “good chaps” conventions of the twentieth century offer no defence against twenty-first-century threats.

Treating this Charter Renewal process like past cycles, seeking incremental reforms or tinkering around the edges, guarantees that this national asset will go into its next Charter weaker and more vulnerable than before.

We need a fundamental reset: a perpetual Charter to end the cycle of political renegotiation; independent commissions for appointments and funding to remove politics from what should be transparent and evidence-based decisions; and a “public lock” that embeds Citizens’ Assemblies and a standing Citizens’ Panel into the BBC’s constitution, to ensure that no temporary political leverage can weaken or dismantle this infrastructure without the explicit consent of the people it serves - and of the elected representatives of all four nations of the UK. Citizen governance in our proposal is not an end in itself, but a bulwark against capture or interference.

This Charter Renewal is the moment to act to secure the BBC for the next hundred years.

And the stakes extend far beyond our shores. At a moment when public service media overseas face capture by the state or surrender to platforms, the UK can show the world that a better path exists: by securing the BBC’s independence and anchoring it in citizen governance, we can protect information infrastructure that is neither state-controlled nor market-dominated, but genuinely public.

**This is our chance to secure the BBC for future generations. It is our BBC. We must build it to last. Our democracy, our culture, our security - and our place in the world - depend on it.**

# APPENDIX 1

## HOW THE BBC IS CURRENTLY GOVERNED

### TWO FOUNDATIONAL GOVERNANCE INSTRUMENTS

The BBC is currently constituted and governed by two key instruments:

- The Royal Charter ([Cm 9365](#)) serves as the BBC's constitutional foundation. It sets out the BBC's mission, public purposes, governance structure, and independence guarantees.<sup>128</sup>
- The Framework Agreement ([Cm 9366](#)), between the BBC and the Secretary of State, Department for Culture, Media and Sport (DCMS), addresses operational detail, including its funding and regulatory arrangements, service requirements, and the licence fee mechanism. This is subordinate to the Charter.<sup>129</sup>

### THE BBC'S ROYAL CHARTER AND ITS PURPOSES

The BBC's constitutional foundation, a Royal Charter, underscores its core purpose as an institution designed to work in the public interest. While more than 1,000 Royal Charters have been granted by the Sovereign to a range of bodies<sup>130</sup> since 1155, new Charters since the 1950s, which the BBC's Charter pre-dates, are "normally reserved for bodies that work in the public interest (such as professional institutions and charities) and which can demonstrate pre-eminence, stability and permanence in their particular field."<sup>131</sup> The Crawford Committee recommended granting the BBC a Royal Charter rather than creating it through an Act of Parliament to give it a special status of 'prestige and influence'.<sup>132</sup>

The Royal Charter sets out 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. It also sets out the BBC's five public purposes, which have evolved regularly over its 100-year existence:

128 DCMS (2016) Broadcasting. Copy of Royal Charter for the continuance of the British Broadcasting Corporation. [https://assets.publishing.service.gov.uk/media/5a80c6d740f0b6230269570c/57964\\_CM\\_9365\\_Charter\\_Accessible.pdf](https://assets.publishing.service.gov.uk/media/5a80c6d740f0b6230269570c/57964_CM_9365_Charter_Accessible.pdf)

129 DCMS (2016) Broadcasting. An Agreement Between Her Majesty's Secretary of State for Culture, Media and Sport and the British Broadcasting Corporation.

130 Including educational institutions, livery companies, banks, scientific and medical institutions, and arts and culture organisations. <https://privycouncil.independent.gov.uk/wp-content/uploads/2025/05/2025-05-13-Record-of-Charters-Granted.pdf>

131 'Royal Charters' - The Privy Council Office (<https://privycouncil.independent.gov.uk/royal-charters/>)

132 National Archives - 'A Royal Charter for BBC' (19 November 1926) <https://www.nationalarchives.gov.uk/education/resources/twenties-britain-part-two/royal-charter-for-bbc/>

1. *To provide impartial news and information to help people understand and engage with the world around them*
2. *To support learning for people of all ages*
3. *To show the most creative, highest quality and distinctive output and services*
4. *To reflect, represent and serve the diverse communities of all of the United Kingdom's nations and regions and, in doing so, support the creative economy across the United Kingdom*
5. *To reflect the United Kingdom, its culture and values to the world*

These purposes could be said to overlap with charitable purposes such as 'the advancement of education' and 'the advancement of citizenship or community development'.<sup>133</sup>

Such purposes underpin the BBC's role as an institution designed in the public interest and, as emphasised in its first purpose, to provide impartial information to all.

## **THE RENEWAL OF THE ROYAL CHARTER AND ITS INDEPENDENCE**

The BBC's impartiality is contingent on its independence from the government as well as from corporate capture. And yet, the BBC's Royal Charter is unusual in that it is not permanent; rather it is granted for a defined period, most often ten years. This is, as the Royal Charter states: "to enable the BBC still better to serve the interests of Our People."<sup>134</sup> As a result, towards the end of the Charter's validity, the government of the day will announce a Charter Review process with a view to Renewal.

### **The Charter**

The Royal Charter is the constitutional document of the BBC. First granted to the BBC in 1927, it establishes:

- The BBC's existence
- Its Mission and Public Purposes
- The principle of its Independence (Article 3)
- Its governance structure
- Its regulatory framework
- The period of the Charter, and any provisions around renewal

The Charter addresses what the BBC is for and how it should be governed and regulated, but not what it does or produces day-to-day nor what its level of funding should be - which are addressed in other instruments.

<sup>133</sup> 'Charitable purposes' - Charity Commission, 16 September 2013 (<https://www.gov.uk/government/publications/charitable-purposes/charitable-purposes>)

<sup>134</sup> DCMS (2016) Broadcasting. Copy of Royal Charter for the continuance of the British Broadcasting Corporation. [https://assets.publishing.service.gov.uk/media/5a80c6d740f0b6230269570c/57964\\_CM\\_9365\\_Charter\\_Accessible.pdf](https://assets.publishing.service.gov.uk/media/5a80c6d740f0b6230269570c/57964_CM_9365_Charter_Accessible.pdf)



## Charter Review and Renewal Process

The Charter Review is conducted by the government of the day, with the process usually starting at least 2 years before the expiry of the current Charter. It is overseen by the Secretary of State for Culture, Media and Sport, and the process usually has the following stages:

1. **Green Paper** - in which the Government sets out a series of questions about the BBC's future
2. **Consultation and evidence** - in which stakeholders will make written submissions, and other kinds of research and engagement will be commissioned
3. **White Paper** - in which the Government sets out its assessment of the evidence and research, and how it intends to proceed
4. **Drafting** - in which the new Charter and Framework are developed, while Select Committees scrutinise the White Paper
5. **Privy Council (not Parliament)** - at which the Charter is formally granted

Charter renewal is effectively a matter between the Crown and the BBC, and not a legislative act with Parliamentary involvement.

## The Framework Agreement

This is a companion document that contains the operational details to complement the Charter's constitutional principles. This Agreement is made between the Secretary of State and the BBC, and can be amended by mutual agreement outside of the Charter Review process. It contains, among other items:

- The scope and terms of all BBC services
- Detailed guidance on governance structures and procedures, including appointment processes
- Transparency and reporting requirements
- Specific obligations related to e.g. Nations and Regions, independent commissions, news provision
- Details about the funding settlement
- Details on the Mid-Term Review

## The Regulatory Role of Ofcom

Ofcom was designated as the BBC's regulator as part of the 2017 Charter, taking over the functions that had previously been carried out by the BBC Trust, including:

- Overseeing the BBC's Operating Licence and associated content obligations
- Assessing - and reporting annually on - the BBC's performance against its Mission and Public Purposes
- Regulating BBC Content standards
- Monitoring the impact of new or changed BBC services on the market (Public Interest Tests and Competition Assessments)
- Handling complaints escalated from BBC First (BBC internal complaints system)

Importantly Ofcom has no power to question the BBC's existence, or to change its Mission, Purposes or governance.

## The National Audit Office

The NAO "conducts [value for money examinations](#) on the use of the licence fee and in relation to the BBC's commercial activities", governed by an [MOU with the BBC](#).

## The BBC's Independence

The Charter's periodic renewal is a feature that for some has represented a moment of vulnerability for the BBC. Some argue it enables incumbent governments to undermine its independence through amending its structure and function. This is a critical vulnerability given the independence of the BBC is core to its constitution. It is encoded in Article 3 of the Royal Charter as follows:

*The BBC must be independent in all matters concerning the fulfilment of its Mission and the promotion of the Public Purposes, particularly as regards editorial and creative decisions, the times and manner in which its output and services are supplied, and in the management of its affairs.*

The question of how to protect and facilitate this key article underpinning the BBC's independence in our current political and media context is a central subject of this paper.

## Accountability to the public

With independence also comes the question of accountability ensuring that the BBC does indeed "serve the interests of Our People". The BBC is held accountable through a number of both external and internal mechanisms, not just the Charter Renewal process.

## Internal accountability mechanisms

The BBC is governed internally by a unitary board.<sup>135</sup> This structure replaced the BBC Trust in the 2017 Charter following recommendations of the Clementi Review. The unitary board is made up of 14 members including: :

- 5 government appointments: Chair (a '[significant appointment](#)') plus 4 'Nations' members (England, Scotland, Wales, Northern Ireland)
- 5 BBC appointments: Non-executive members appointed by the Board's [nominations and governance committee](#)
- 4 executive members: Director-General and three other senior executives

The rationale for the unitary Board structure was that this followed best practice for corporate Bboards in the UK by unifying governance and strategy in a single body, addressing challenges and confusions of the Trust. In doing so, it removed the structural buffer that prevented political appointees from being appointed to the BBC's key governance and editorial oversight body.<sup>136</sup>

The public appointments process is regulated by the [Commissioner for Public Appointments](#). By following this process and the [Governance Code](#) for government appointees to the BBC Board

<sup>135</sup> BBC (2026) About the BBC <https://www.bbc.com/aboutthebbc/howweare/bbcboard>

<sup>136</sup> The Guardian warned in a March 2016 editorial of the dangers of political appointees: <https://www.theguardian.com/commentisfree/2016/mar/14/the-guardian-view-on-the-new-bbc-board-a-threat-to-independence> For a recent analysis of the unitary board and BBC governance, see Coyle, D. (2024), The Governance of the BBC. The Political Quarterly, 95: 20-24. <https://doi.org/10.1111/1467-923X.13382>

(e.g. [Chair](#)), there is, in theory, 'fair and open competition'. However, this process has been criticised for its vulnerabilities to government outreach via: Ministerial control of the composition of Advisory Assessment Panels, ministerial discretion over final appointment decisions from a shortlist, and the DCMS Select Committee's lack of veto power, as it can only recommend for or against the government's preferred candidates, recommendations that ministers can choose to disregard.

### Involvement of citizens in BBC governance

Since the BBC Trust was superseded by the unitary board in 2017, and its [Audience Councils](#) ended, there has been no substantive, participatory or deliberative involvement by the public in BBC governance.

The BBC conducts extensive audience research to gather insights, opinion and preferences, through surveys, polling and focus groups, and it has mechanisms for [complaints](#) and feedback, but does not involve people directly in its governance.

Ofcom has run periodic consultations on BBC performance, and on public service broadcasting more broadly. It ran an online citizens' assembly in 2020<sup>137</sup> as part of the 'Small Screen: Big Debate' review of PSB.

137 London School of Economics - The Future of Public Service Media: The public perspective - results - 2020 <https://www.lse.ac.uk/media-and-communications/research/research-projects/improving-deliberation-and-copyright/The-Future-of-Public-Service-Media>

# APPENDIX 2

## DESIGN PRINCIPLES FOR REFORM

This Charter Renewal process, and in particular the Green Paper stage, is not just an administrative exercise - it represents a significant opportunity for those who seek to secure the long term future of the BBC. To guide the design of our blueprint for reforms, we have established a set of core design principles. These future-oriented principles can be used to evaluate any proposal for the BBC's future, whether from government, the Corporation itself, or external stakeholders, to assess whether it strengthens or weakens the independence and accountability the BBC needs to fulfil its foundational purpose.

These principles group into three particular areas of focus:

### *What the BBC commits to provide to the UK: foundational principles that any reforms must meet:*

- 1. Epistemic Security:** The BBC must strengthen the resilience of the UK's information environment as discussed above and in more detail in '*Epistemic Security 2029*'.<sup>138</sup> This means improving access to accurate, impartial information; supporting media plurality; and resisting capture by political, commercial, or ideological interests. This is our equivalent of the 'market impact assessment' or the 'public value test', but for protecting democratic resilience, not commercial competition.
- 2. Universality:** The BBC serves everyone - not demographics attractive to advertisers, not audiences algorithmically optimised for engagement. In an era of hyper-personalisation, this capacity is more important than ever. Universality of access means ensuring that every resident can receive and interact with all public information and media services (including the BBC, S4C, Alba) regardless of income, geography, disability, or platform. Universality of appeal means serving the full breadth of the public, including people and places deemed unviable for commercial or other media. Universality of usage<sup>139</sup> means that the full democratic benefits of a trusted, impartial provider are realised, and safe shared spaces are created for debate and mutual understanding. Universality of funding means that everybody contributes, so that everybody benefits.<sup>140</sup>

<sup>138</sup> Demos (2025) *Epistemic Security 2029*. <https://demos.co.uk/research/epistemic-security-2029-fortifying-the-uks-information-supply-chain-to-tackle-the-democratic-emergency/>

<sup>139</sup> Expressed as 'Regularly reaching and engaging everyone' in Section 5.6 of the BBC's 2024 paper, *A BBC For The Future*, <https://www.bbc.co.uk/aboutthebbc/documents/a-bbc-for-the-future.pdf>

<sup>140</sup> Martin, D., Johnson, C. (2023) *Universality: A Battleground for UK Public Service Media in the Platform Age*. *The Political Quarterly*. <https://doi.org/10.1111/1467-923X.13342>

Universality should also be embedded as a principle in governance. The BBC's governance currently happens through proxies - the Board, the Secretary of State, Ofcom, consumers. The BBC's legitimacy ultimately flows from the public it serves and to whom it truly belongs, and therefore the public must have a direct, structural, meaningful role in its governance. The best method to represent universality in governance at a meaningful scale is to constitute a deliberative body that embodies the public, such as a citizens' panel, whose members are selected through sortition and stratification.<sup>141</sup>

- 3. Public Value above Private Interest:** The BBC's mandate is to generate public value that markets can struggle to prioritise, such as democratic participation, trusted information during crises, social cohesion, collective experiences and memories.<sup>142</sup> Reforms must aim to maximise the BBC's potential to create these public goods, while being balanced in their effects on commercial, digital and local markets - including exploring public-private partnerships where these increase public value. The BBC should also underpin and deliver for the wider public service media ecosystem, investing in shared and interoperable standards, and creating systems from which other providers benefit, enabling them to carry out other beneficial functions that the BBC does not perform.

*What the BBC needs as structural foundations: these embed and protect its foundational principles:*

- 4. Constitutional Stability:** The framework underpinning BBC independence, governance, and public accountability must function as a stable constitutional settlement. With that in place, funding mechanisms and editorial arrangements should then be able to evolve, but each review or negotiation should not be an opportunity to question fundamental principles or erode core protections. This requires proposals to have clarity about what is foundational (outside periodic renegotiation) and what is operational (legitimately adaptable).
- 5. Citizen Involvement in Governance:** Standing Citizens' Panels, with defined, meaningful roles and powers in governance on constitutional and strategic issues create a source of democratic legitimacy that the government cannot bypass or override. In concert with the Universality principle (#2), where such bodies genuinely are the public rather than merely representing it, this serves as a sheet anchor against populist capture: when politicians claim to speak 'for the people' against 'elite' institutions, the people can speak for themselves through a permanent body that has citizen oversight over that institution. Proposals that meaningfully embed citizen involvement would root BBC independence in genuine public mandate rather than political permission.
- 6. Funding Adequacy:** The universal model of funding for the BBC is key to its mandate, even if this is supplemented by other sources of revenue. The BBC's funding must be sufficiently predictable, consistent and adequate to enable it to fulfil its purposes, to invest in a strategic way, and to protect it against political leverage. Legal standards in Europe have enshrined the principle that the Public Service Media (PSM) framework itself must guarantee adequate funding.<sup>143</sup> Therefore inadequate or politically contingent funding fails these obligations, as does creating uncertainty over funding.<sup>144</sup>

141 Democracy Next - Assembly Guide - The Sortition Process - <https://assemblyguide.demnext.org/before-the-assembly/#the-sortition-process-selection-by-lottery-and-stratification>

142 The High Level Panel on Public Interest Media - The Economic Imperative of Investing in Public Interest Media: A statement by 11 of the world's leading economists - Forum on Information and Democracy, September 2025 - <https://informationdemocracy.org/wp-content/uploads/2025/09/The-Economic-Imperative-of-Investing-in-Public-Interest-Media.pdf>

143 For example, Article 5 of the European Media Freedom Act, which states that "Those funding procedures shall guarantee that public service media providers have adequate, sustainable and predictable financial resources corresponding to the fulfilment of and the capacity to develop within their public service remit." ([https://www.media-freedom-act.com/Media\\_Freedom\\_Act\\_Article\\_5\\_\(Regulation\\_EU\\_2024\\_1083\\_of\\_11\\_April\\_2024\).html](https://www.media-freedom-act.com/Media_Freedom_Act_Article_5_(Regulation_EU_2024_1083_of_11_April_2024).html))

144 Albanesi, E - "Art. 5 EMFA and the independence of Public Service Media Providers: less than one year to change domestic legislation accordingly" - European University Institute, 25 October 2024 - <https://cmpf.eui.eu/art-5-emfa-and-the-independence-of-public-service-media-providers/>

- 7. Multi-layered institutional defence:** True independence depends on overlapping safeguards across multiple domains, including: constitutional and statutory status, governance, funding, commercial arrangements, public engagement, editorial processes, and appeals. This principle, known in some domains as ‘defence-in-depth’, means that no single point of failure should be able to compromise the whole. Enabling greater accountability requires also embedding multiple defences and veto points so that no single actor or body can weaken protections unilaterally: high thresholds in multiple bodies for fundamental changes, the right to judicial review of decisions that threaten independence or existence, board appointments processes insulated from political control, and statutory protections. Ensuring that there has to be consensus between statutory, judicial, legislative and procedural bodies, makes it much harder to capture.

### *What processes to reform the BBC should entail:*

- 8. Do no harm:** Reforms should demonstrably strengthen (‘ratchet’) - never weaken - protections for independence, accountability, or universality. Where agreement cannot be reached, the baseline protections should remain in place - this should also apply to the Charter itself. The burden of proof should be on those proposing changes to show how they will not undermine existing safeguards. This could be assessed by adapting a Welsh ‘Future Generations’ test, which requires public bodies to consider the long-term impact of changes on future generations.<sup>145</sup>
- 9. Transparency and accountability:** The BBC must be transparent about its strategic priorities, governance decisions, and editorial standards to build public legitimacy. This legitimacy can be reinforced - and political overreach checked - by creating a proper mechanism for citizen involvement and oversight. Transparency about editorial decision-making can build public literacy about how credible information is produced and verified, thereby strengthening the BBC’s relationship with audiences and their resilience in a volatile information environment.

Other forms of transparency can help inoculate the BBC against further attacks - from logging and publishing any political contacts between government and BBC, documenting attempts at interference, to strengthening the Information Rights department to ensure compliance with FOI requests.<sup>146</sup> But transparency must not create vulnerabilities to coordinated or vexatious attacks designed to undermine editorial and journalistic processes. Vigorous protections for staff and editorial independence underpin accountability.

- 10. Adaptability:** The scope of each instrument or mechanism governing the BBC should be clearly bounded and distinct, and amendments to one should not be able to call others into question. The more consequential the change proposed, the higher the threshold required to approve it. Concretely, day-to-day operational matters remain purely internal; the organisation retains flexibility in how to deliver against its remit (e.g. within the Framework Agreement or its successor); strategic direction will evolve periodically through the Board; but foundational changes - to mission, purposes, or constitutional status - require wider democratic debate and assent.
- 11. Learning from evidence:** The number of public service media (PSM) classed as truly independent is shrinking. The BBC should, as a feature of the new Charter and companion instruments, seek to match or raise best practice and international standards through

<sup>145</sup> Welsh Government (2025) The well-being of future generations <https://www.gov.wales/well-being-of-future-generations-wales>; see also the United Nations Declaration on Future Generations, part of the UN Pact for the Future (22 September 2024) - <https://www.un.org/pact-for-the-future/en/annex-ii-declaration-future-generations>

<sup>146</sup> What Do They Know? BBC - <https://www.whatdotheyknow.com/body/bbc>

ongoing benchmarking against peer PSM internationally<sup>147</sup> (while acknowledging that the UK constitutional and media environments are distinct), including for how they are responding to new threats to and protections for resilience and democratic innovation.

147 The Public Media Alliance plans to release a new Public Service Media Value Index in 2026: <https://www.publicmediaalliance.org/the-value-of-public-service-media/>



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