

DEMOS

YOUR BBC

DEMOS RESPONSE TO THE
DCMS CONSULTATION ON
BBC CHARTER RENEWAL

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MARCH 2026

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ABOUT THIS PAPER

This paper is Demos's formal response to the DCMS Consultation - submitted both via questionnaire and, for the extended submission, via email. Our extended submission explains the rationale for our recommendations further with key references.

Please note that a number of our recommendations are expanded further in our recent Demos publication, "[Our BBC: A blueprint for a more independent and future-proofed BBC](#)". We provide page numbers and recommendation numbers for ease of reference.

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 evidence submission as part of 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.

The authors for this submission include: Hannah Perry, Sameer Padania and Polly Curtis. **Hannah Perry** is Interim Director of Demos Digital, Demos' digital policy research hub. **Sameer Padania** is an independent researcher on healthy information ecosystems and Demos Fellow. **Polly Curtis** is Chief Executive of Demos with a background as digital editor of the Guardian and leading newsrooms as Editor-in-Chief at HuffPost UK, a Partner at Tortoise Media and Managing Director at PA Media.

With thanks also to Demos colleagues Azzurra Moores (Associate Director of Information Ecosystems), Flynn Devine (Lead Researcher), Sofia Lyall (Senior Researcher), and the members of the Epistemic Security Network for their expert guidance and input.

FOREWORD

BY POLLY CURTIS



The BBC's charter renewal - the once-every-ten-years process to reassess its funding, missions and public purpose - has come at a critical time. We are in a moment of democratic emergency. Around the world, democratic norms are under intense pressure from a loss of faith in democracy and rising authoritarianism. We're witnessing democratic backsliding, and organised attacks on the institutions designed to keep the checks and balances on autocratic leaders. **We are in a fight for the future of democracy.**

High quality information - journalism - is absolutely critical to democracy. Without healthy supply chains of information, societies divide, economic power consolidates and democracies fail. Our epistemic, democratic and national security is compromised.

In the UK we are seeing the collapse of local news infrastructure, the atomisation of information so that it divides us, rather than unites us, and the breakdown of our cyber security. At the same time, hostile actors seek to spread misinformation and to intentionally erode democratic trust. This is an information war against democracy.

Look to the US and you see where that leads. A president, demonstrating many of the traits of an autocrat, who has launched a strategic campaign against journalism beyond his own borders.

But we have a precious asset that can help prevent the failure of our information supply chains. It is the first line of defence. Britain has a single source of news consumed and still trusted by most people regardless of their politics. The democracies failing faster lack that. By comparison the US is far more fragmented and polarised.

The BBC is an extraordinary thing. It is also an imperfect thing. But if it didn't exist. People like me would be sitting in Think Tanks trying to invent it. We must use this charter renewal process to strengthen it and make it more independent and resilient for the future.

Our proposals focus on this task: how can we ensure the BBC is independent from political interference and accountable to the public that has a stake in it via the license fee. We set out a nuanced set of proposals designed to make the BBC more secure for the future, more accountable to the public, and ultimately even more trusted for the future.

This paper reflects our submission to the Charter Renewal process and is therefore detailed and sets out the full rationale behind them.

So absolutely the BBC is important because of Strictly and Traitors and CBeebies - they are what brings us together and gives us all a stake in it. It's what makes it your BBC.

But it's important beyond that - it's vital for our national solidarity, democratic resilience and security.

Polly Curtis, CEO Demos

INTRODUCTION

THE BBC'S MISSION & PUBLIC PURPOSES

QUESTION 1

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

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

If disagree: 200 word response:

Public Purpose 1 should be amended from: "To provide impartial news and information to help people understand and engage with the world around them" to "To provide an impartial, accurate and trustworthy news and information environment to help people understand, engage and deliberate with the world around them.

Avoid enshrining the BBC with regulated duties to 'counter mis/disinformation' given how difficult it is to define and apply such terminology.

Ensure the Purpose 'to support media literacy efforts in the UK' avoids narrow, protectionist interpretations and embraces broader critical definitions.

Add a sixth technology Purpose to the BBC's five purposes that reintroduces former language used in the Charter in 2007–2016. The BBC should "deliver to the public the benefit of emerging communications technologies and services" and with the updated amendment "and infrastructure, to enhance the quality and sovereignty of our democracy".

Ensure 'funding adequacy' for the BBC to fulfil its mandate and purposes.

Entrench the BBC's Object, Mission, Public Purposes, independence, and universality as foundational provisions in a perpetual and simplified Charter, amendable only through a 'public lock' mechanism.

Establish within the Charter the requirement for the BBC to devise appropriate methods for involving citizens in its governance.

Demos rationale

The BBC's core 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", remains crucial.¹ However, the five Public Purposes must be updated to reflect the significant demands not just of our digital age, but also the threats of the increasingly dangerous geopolitical environment to the UK's democracy.

Information warfare has become a central tactic of hostile authoritarian states. Information - trusted, shared sources of the truth - is now the frontline not only of our national security and conflict, but in the daily lives of citizens across the country. As such, the Purposes of the BBC need to be updated to reflect its critical role in the defence of not just the UK's information environment, but of our democracy.

To strengthen and future-proof the BBC's Purposes in this context, we make 7 recommendations:

1. Amend Public Purpose 1:

- From: 'To provide impartial news and information to help people understand and engage with the world around them'
- To: "To provide an impartial, *accurate and trustworthy* news and information *environment* to help people understand, engage and *deliberate* with the world around them.

Demos agrees with the DCMS Green Paper that proposes giving accuracy equal importance alongside impartiality in the BBC's Mission and Public Purposes. This is crucial in today's digital media environment given the increase in the wide-spread availability of information which is inaccurate or has not met the editorial standards the BBC espouses to, for example via social media and AI chatbots. As the BBC comes to invest further in its own technological innovations, it will be crucial that 'accuracy' remains of paramount importance.

However, we would go further by adding the word 'trustworthy'. This is also important because providing impartial and accurate news, content and services is no longer sufficient in earning and enabling the UK public's trust in the news and information they consume. This requires the BBC, alongside all of our democratic institutions, to continuously re-evaluate the steps it can take to increase and maintain the UK public's trust in the news and information it provides.

The further addition of the word 'environment' is also important because it recognises that the BBC doesn't just provide news and information, but also spaces and experiences through its technology infrastructure, products and services that shape how audiences engage with it. The algorithms and design choices the BBC deploys across its products and experiences determine what audiences encounter, when, and in what order. These could be optimised for engagement and click volume - the dominant logic of commercial platforms - or they can be designed to serve public purposes, such as offering a pluralistic diet of news and information, supporting informed decision-making, and facilitating respectful public discourse. This is not just technical or incidental; it is a values choice, and one the BBC must be accountable for making explicitly and transparently.

The BBC's analytics and data practices are governed by a fundamentally different logic to those of commercial platforms. Where private services collect and exploit user data to build

¹ BBC (2026) Mission, values and public purposes. <https://www.bbc.com/aboutthebbc/governance/mission>

behavioural profiles, target advertising, and monetise attention, the BBC's analytics exist to assess whether it is delivering against its public Purposes, i.e. to improve services and maximise value for audiences, not to extract value from them. For the BBC, users are not the product - they are the client and the owner.

Together, these design and data choices constitute the BBC's responsibility towards the wider information environment, which distinguishes it sharply from private social media platforms and AI-based services, where such choices are made in the interest of shareholders rather than of the public.

As the BBC's technology infrastructure evolves, such system design choices must also be transparent and led by what is in the public interest. We recommend that by adding the word 'environment' to this Purpose, greater investment and attention to how these spaces and technologies are designed can be afforded and assessed.

2. Avoid enshrining the BBC with regulated duties to 'counter mis/disinformation'.

We note and disagree with the proposal within the DCMS Green Paper to add a further BBC Purpose "to counter mis/disinformation... to ensure the BBC is held to the highest standards in supporting these efforts."

At Demos, we strongly agree with concerns about the rising threats of mis/disinformation in our vulnerable information environment and agree that the BBC provides a key role in tackling this threat through its provision of impartial and accurate journalism not just in the UK, but around the world. However, the proposal to regulate the BBC for its ability to effectively counter mis/disinformation creates considerable unintended, but serious risks for the BBC. Should other countries' public service media organisations also follow this lead around the world, such risks would also flow to them. As a result, such a proposal must be considered through both a domestic and foreign policy lens.

Whilst definitions of mis/disinformation exist, how exactly these terms can be applied to specific examples in the information environment remain and continue to be highly contested, particularly in law. Including the effective countering of mis/disinformation as a regulated duty makes the BBC's activities in this regard a matter of legal compliance regulated by Ofcom, rather than a matter of editorial decision and standards by the BBC. The suggestion that it will be possible for Ofcom to assess and regulate the BBC's effectiveness in this regard also significantly underestimates these complexities. At this stage, Ofcom does not have any responsibility to assess compliance in relation to misinformation so this would be a new power that currently lacks legal backing or agreed definitions.

Furthermore, the role of fact-checking and verification surrounding mis/disinformation is one that has unfortunately, in the US at least, and by major social media platforms headquartered there, become associated with accusations of bias.² By requiring that the BBC acts as an arbiter of truth and by using the language of 'mis/disinformation' - rather than focusing on its mandate to provide impartial, accurate information - exposes the BBC to the risk of being seen as institutionally partisan, thus undermining its core mandate.

² BBC (2025) "Facebook and Instagram get rid of fact checkers. <https://www.bbc.co.uk/news/articles/cly74mpy8klo>; Walker and Gottfried (2019) "Republicans far more likely than Democrats to say fact-checkers tend to favour one-side." <https://www.pewresearch.org/short-reads/2019/06/27/republicans-far-more-likely-than-democrats-to-say-fact-checkers-tend-to-favor-one-side/>

Internationally, the BBC World Service is valued as a trusted, impartial source of news in contexts where independent journalism is scarce or suppressed, and more generally in the context of global information warfare. Any perception - however unfounded - that the BBC has become an instrument of a particular political worldview directly undermines that standing, and can bring material consequences extending beyond just editorial reputation. Domestically, similar dynamics could exacerbate existing fault lines and factional grievances, potentially deepening the very information dysfunction it is meant to address.

We believe a more positive representation of the value the BBC brings to the information environment through its existing strengths as articulated in Purpose 1 (assuming our other recommendations above are also implemented) is sufficient. A focus on the outcome of a trustworthy news and information environment provides the flexibility - and editorial and operational freedom - for how the BBC achieves this.

3. Consider how to secure the conditions in which a Purpose 'to support media literacy efforts in the UK' could be successful

We note the DCMS Green Paper's proposal to add a further BBC Purpose "to support media literacy in the UK, to ensure the BBC is held to the highest standards in supporting these efforts."

We recognise the important role of the BBC as an important contributor of media literacy education through its educational programming and initiatives, including Bitesize and Young Reporter Scheme, and through its other initiatives such as Verify and its approach to transparent journalistic reporting. The BBC has unique reach, scale and the ability to present key messages in a variety of engaging formats, such as soap operas, drama, documentaries and during key pivotal, collective and/or vulnerable moments for the country, such as during elections and crises, that are difficult for the school sector and other education or voluntary sector organisations to replicate. There could be a significant opportunity for the media literacy skills of the UK public to be accelerated, should the BBC use these unique assets and opportunities for media literacy education.

The BBC's ability to help catalyse and scale the important work of other voluntary organisations in the sector could also be highly valuable, particularly if providing a shared resource library and by drawing a larger audience to existing high quality resources. We think that including a regulated duty to secure and recognise this focus could be beneficial.

However, there are a number of important conditions and considerations that must be factored in for this new duty to be successful in order to limit any unintended consequences with this initiative.

First, it will be crucial to clarify the definition of 'media literacy' in operation within this Purpose. The current framing of the proposed new BBC Purpose regarding duties for media literacy alongside countering misinformation and disinformation could suggest that media literacy efforts are purely designed to tackle this issue. Media literacy is much more than fact-checking or identifying mis/disinformation and indeed online safety. This narrow, protectionist definition is what has limited the effectiveness of earlier conceptions of media literacy in the school curriculum that have, in the recent Curriculum Review, been improved.

Media literacy should instead be understood as the means by which the public can develop a critical understanding of the entire evolving media and information environment. As with reforms to the National Curriculum that have also sought to increase the level of media literacy education in the curriculum, it would be important for the BBC's media literacy provision to enable the public to engage actively as citizens and creative media producers in the media and information environment, contributing to social cohesion and empowering informed democratic participation. Critical AI literacy (not just functional digital and AI skills, though also crucial) should also be understood as a key component of media literacy.

To avoid the misinterpretation of the intention of the media literacy inclusion in the BBC's Purposes and indeed to avoid missing what could be a good opportunity to strengthen the UK's media literacy skills, it should be distinguished as a distinct Purpose and not conjoined to one that focuses on countering mis/disinformation.

Furthermore, it would be useful to highlight the outcomes intended by strengthening media literacy skills so as to ensure the success metrics are aligned and not open to accusations of self-serving/ bias. For example, it would be important to ensure that BBC's news media provider's consumption is not used as the indicator of good media literacy. Instead, it will be important to recognise the importance and value of all other good quality news providers that include independent journalists and news aggregators. Importantly, citizens should learn how to be able to evaluate and critique the whole news media ecosystem, including the BBC.

4. Add a sixth technology Purpose to the BBC's five purposes that reintroduces former language used in the Charter in 2007–2016. We recommend stating that the BBC should "deliver to the public the benefit of emerging communications technologies and services" and with the updated amendment "and infrastructure, to enhance the quality and sovereignty of our democracy".³

The increasing centralisation of control over the UK's information infrastructure by a small number of large technology companies that are predominantly based in the USA creates systemic vulnerability for the UK's information environment. This foreign corporate control undermines our epistemic security, hampers British innovation and undermines our self-reliance.⁴ The BBC offers a central vehicle by which we can invest in and build-up British digital public infrastructure that could benefit domestic investment in start-ups and the wider public interest information ecosystem.

We believe reinstating and strengthening this Purpose would facilitate the goals stated in the DCMS Green Paper to "establish the BBC as a trusted, public values leader in new technology."

5. Ensure 'funding adequacy' for the BBC

We recommend that the Charter explicitly aligns with the European Media Freedom Act and other international standards by guaranteeing the BBC 'funding adequacy' to fulfil its mandate and purposes, and that responsibility for determining what the level of 'adequate funding' should be, is given to an independent body, modelled on the lines of the German KEF.

³ Demos (2026) Our BBC. Recommendation 3.2, Page 30.

⁴ Bria, F., Timmers, P, Gernone, F (2025): EuroStack A European Alternative for Digital Sovereignty. Bertelsmann Stiftung. Gütersloh. <https://www.euro-stack.info/#report>

As we and others, including the DCMS Green Paper, are recommending additional Purposes, it is also crucial that these additional Purposes are supported by additional and commensurate funding. Expanding the BBC's responsibilities without also expanding its funding will of course further undermine its ability to deliver on its existing Purposes - a capacity that has already been undermined during previous Charter renewals and related negotiations that have imposed a real-terms cut of 38-40% over 15 years.⁵ We therefore wish to make explicit that these amendments and additions to the BBC's Purposes can only be made if the BBC is also provided with additional funding.

6. Entrench the BBC's Object, Mission, Public Purposes, independence, and universality as foundational provisions in a perpetual and simplified Charter, amendable only through a 'public lock' mechanism⁶

Whilst we are currently making recommendations for additions and amendments to the BBC's Purposes, we do not believe these Purposes or the BBC's wider existence should be available for re-negotiation as regularly as every 7-10 years. Instead we recommend removing the time limit from the Charter and making it a perpetual Charter, or, at minimum, granting the BBC 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 the need for the BBC to adapt and evolve its strategy and operations in response to changes in society, technology, demographics and media use. 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.

A 'public lock' would ensure these foundational provisions of the BBC could be amended, but only with parliamentary supermajorities in all four legislatures of the UK, and by requiring Advisory Reports from an Independent Citizens' Assembly 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, universality 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 in its 2013 Royal Charter.⁷ This was reinforced by Clause 96 of the Enterprise and Regulatory Reform Act 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.⁸ This additional companion legislation helps protect such bodies against political capture or anti-democratic exploitation of short-term crises.

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

6 Demos (2026) Our BBC. Recommendation 3.2, 3.3, 3.7, 3.8, Page 30.

7 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/>

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

7. Establish within the Charter the requirement for the BBC to devise appropriate methods for involving citizens in its governance.⁹

The Charter should establish a binding requirement for the BBC to involve citizens meaningfully in its governance, as a constitutional obligation in its new permanent Charter, rather than a discretionary choice.

The detail of this obligation should then be elaborated across two further instruments:

- Companion legislation to the Charter (the BBC Independence Act proposed in our report) will define the responsibility, aims and principles that govern citizen involvement (i.e. why it matters and what it is meant to achieve)
- The Operational Agreement will specify the practicalities, such as how citizen involvement is structured, designed, implemented, evaluated and adjusted over time. This will be subject to a new Operational Review cycle, which would replace the existing Framework Agreement and Mid-Term Review, and through which the citizen involvement mechanisms can be periodically assessed and, where necessary, reformed.

QUESTION 2

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

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

Demos rationale

We recognise the important role the BBC plays in contributing to the growth of the creative and digital economy. However, the addition of a Purpose that focuses the BBC's role on economic growth may risk subordinating other Purposes focused on what is in the public interest, which we regard as the most important. The fact that an economic growth Purpose could both be incongruent with a public interest Purpose and supersede it suggests that it would have a negative impact on the BBC's primary purpose. We therefore disagree - unless such concerns can be met.

QUESTION 3

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

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

Demos rationale

The BBC is already doing a considerable amount to represent all audiences. However, we must recognise that the UK public is increasingly divided and thus the ability to represent and bridge such divides is likely to continue to be increasingly challenging. The BBC's ability to provide a foundational layer of trustworthy, impartial and accurate information, together with its service to national moments and providing unifying stories via sport and entertainment, and its pivotal role in education and lifelong learning, is of paramount importance. The BBC must therefore be supported, **through adequate funding**, to continue to provide a full range of content where that breadth and diversity of types of content is crucial to its ability to provide the possibility of a shared language and finding common ground.

QUESTION 4

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

- Producing more content that is distinctive to the UK
- Covering genres which are less covered by other broadcasters e.g. arts, minority language broadcasting
- Producing more content that brings people together around shared moments
- Sharing diverse voices and perspectives from all parts of the UK
- Improving on and off screen diversity
- Other, please specify [Free text box; 50 words]

Invest in public interest technology infrastructure to enable universal access to content for all audiences irrespective of where they consume their information, and without dependency on foreign, privately-owned digital infrastructure, and to anchor and serve the wider information ecosystem, including mitigating information deserts.

- No changes are necessary
- Unsure or no opinion

CHAPTER 1

A TRUSTED INSTITUTION

QUESTION 5

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

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

Please note that Demos hasn't responded to this question in the formal questionnaire for concern that our answer could be misinterpreted without the clarification provided below.

Demos rationale

The BBC Board members need stronger standards, including integrity requirements. We recommend strengthening integrity provisions that require Board appointees to set aside other appointments, investments and positions that create conflicts of interest.¹⁰ 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.¹¹ 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 for BBC Board positions.

¹⁰ BBC Board Code of Practice - https://downloads.bbc.co.uk/aboutthebbc/insidethebbc/managementstructure/boardregsandpolicies/board_code_of_practice.pdf

¹¹ Demos (2026) Our BBC. Recommendation 4.1.3, P 40.

QUESTION 6

How, if at all, does the amount those working for the BBC are paid impact your view of the BBC? When responding, you may wish to consider how much it impacts your trust in the BBC's outputs and whether it affects how much you engage with BBC services. [200 word open box]

Demos has not responded to this question as it falls outside of our area of expertise.

QUESTION 7

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

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

Demos rationale

The definition of 'accountability' as articulated in the DCMS Green Paper addresses part, but not all types of accountability that we regard as suitable for the nature of the institution that is the BBC.¹² Here we focus on the lack of a role for the public in the governance of the BBC as an important accountability mechanism and provide recommendations for tackling this gap.

It is important to first stress that the BBC undergoes a significant level of scrutiny from a range of different bodies (Ofcom, NAO, DCMS, Treasury, Parliamentary oversight), more so than any other UK media organisation. However, such scrutiny does not equate to public accountability. Each current mechanism flows back to the government or to the Secretary of State as proxies for the public. As a result, the only form of accountability that the public can exercise on the BBC, other than by submitting complaints, is by choosing not to pay the Licence Fee. The public thus lacks any authority or a role in the governance of the BBC, and hitherto, it is up to the government or the BBC leadership - not the public - to define what they identify to be in the public interest.

The BBC also receives a significant level of scrutiny from the media and wider social media ecosystem. However, such noise can rarely be easily interpreted as an accurate and representative diagnosis of public perception nor can it be used as a source of clear, actionable recommendations.

¹² We noted the following definitions of accountability in the DCMS Green Paper: decisions are responsive to and reflective of the public; decisions are informed by stakeholders and explained clearly; feedback is considered and taken seriously; if mistakes happen, swift corrective action is taken and lessons are learned.

Consultation questions and Demos answers

The BBC itself conducts a range of consultations, surveys, types of research and design processes that involve the public in different ways and for different purposes - from understanding audience preferences to designing improved or new services. From 2006-2017, the BBC Trust took input from voluntary bodies in the four nations of the UK known as Audience Councils - these were a listening mechanism for 'licence fee payers' with an 'informed interest in BBC services'. Some consultations are required by law (e.g. material changes to services) and therefore have a targeted form of accountability. It also has some editorial forms of scrutiny and feedback, including of its own leadership and management. But these processes are BBC-framed and -led, and, even if the results are made publicly available, are extractive (i.e. one-way) rather than a dialogue.

To tackle this gap in clear, functional systems for public accountability for the BBC, Demos recommends: **writing 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.**¹³

As part of the Operational Agreement, the government 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. Specifically, this Panel would have a remit to deliberate on high-level questions related to the BBC's strategic priorities, with a 'comply or explain' mandate vis-a-vis the Board. The BBC Citizens' Panel should also have an input into funding settlements - which have in the past been a key means for governments to exert leverage over the BBC.

This body should then be part of a revised Periodic Operating Review framework, which will allow it to be properly evaluated and evolved as appropriate, including to consider other, potentially more scalable forms of citizen involvement as new techniques become available - but with its existence and overall powers guaranteed in Charter and statute.

As a second and separate element, any fundamental changes to constitutional arrangements for the BBC, the Charter, or the laws that would undermine the future sustainability, character or even existence of the corporation, should be subject to the "public lock" 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 public 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.

¹³ Demos (2026) Our BBC. p42-49. https://demos.co.uk/wp-content/uploads/2026/01/Our-BBC_Report_January-2026.pdf; See also Demos (2026) Our BBC: FAQ for citizen participation in BBC governance recommendations. https://demos.co.uk/wp-content/uploads/2026/02/BBC_Citizen-Participation-FAQs_2026_Feb.pdf

QUESTION 8

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

- Requiring the BBC to use consultative forums, such as citizens' assemblies, so that decision-making represents the public's views and voices
- Requiring the BBC to hear regional perspectives through new consultative frameworks or other structures, representing each of the UK's nations and/or regions
- Enhancing how the BBC conducts audience research to help inform decision making
- Strengthening requirements of the Board to ensure the BBC engages with the public in a meaningful way
- Changing the structure of the Board to enhance its effectiveness and accountability
- Changing the Board's appointment process, this could include reducing the government's role in board appointments to appointing the Chair only
- Clarifying the roles and responsibilities of board members, this could include setting out duties for the Chair
- Enhancing the role of the independent board members and their ability to hold the BBC to account
- Strengthening the external scrutiny of the BBC, this could include, for example, greater oversight by Ofcom or Parliament
- Other (please specify) [free text]

New Supervisory Board members, including Chair, appointed through new Independent Appointments Commission against published skills criteria, potentially with pre-appointment hearings, and oversight from Governance Conduct Panel. Funding settlement process led by new Independent Funding Commission. Standing Citizens' Panel in governance layer (<120 members, sortition, "comply or explain" powers vis-a-vis Board).

- No changes are necessary
- Unsure or no opinion

Demos rationale

Demos supports the measures as selected above, and recommends 5 additional measures that each address distinct gaps in the BBC's current accountability and governance arrangements:

1. The BBC Board should be restructured from a unitary to a supervisory model, separating governance oversight from executive management.¹⁴

A supervisory model would reflect the BBC's character as a public interest institution rather than a commercial PLC and maintains some key corporate governance characteristics. Such a model is the norm outside of the English-speaking corporate governance world, particularly in the

¹⁴ Demos (2026) Our BBC. Recommendation 4.2.1, p40

German context exemplified by the ARD.¹⁵ A separate Executive, led by the Director-General, would be responsible for operations and editorial decisions, accountable to the Supervisory Board but protected from its interference in editorial judgments.

2. Establish an Independent Appointments Commission that would create an independent, professional and expertise-based board appointments process, fully independent of ministerial influence or control.¹⁶

This Independent Commission should appoint all non-executive Board members and be modelled on the Judicial Appointments Commission. It would provide a pipeline of qualified candidates for the BBC Board committed to public service. All appointments should be made against published skills and competency criteria, replacing ministerial selection. Government involvement should be limited to a veto on specific and narrow grounds on the Chair, exercised transparently. Candidates should face pre-appointment scrutiny by the DCMS Select Committee. The Commission could also be extended to cover appointments to the boards of Channel 4 and Ofcom. This would tackle the degradation of the public appointments process in recent times, “with politics coming to dominate the public service nature of the roles.”^{17,18}

3. Establish a BBC Governance Conduct Panel (a component of either Board model)¹⁹

One of the challenges that has endangered trust in the BBC most recently is a perceived lack of consequences for misconduct, in part due to the lack of a dedicated accountability mechanism attached to the Board. A BBC Governance Conduct Panel would be separate from government, BBC, and Ofcom, and analogous to the Judicial Conduct Investigations Office. It should have powers to investigate complaints about non-executive Board members’ conduct, make findings public, and 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.

4. Establish an Independent Funding Commission (IFC) independent of ministerial or Treasury control.²⁰

An Independent Funding Commission should be established as the arms length body assessing and determining, through a transparent and evidence-based process, what the BBC needs in terms of financial resources to deliver its mandate and public purposes. This would replace the current ministerial and Treasury control over the process and turn the funding of the BBC away from political instrumentalisation. The IFC’s determination would be binding upon the Government - a requirement written into the Charter as a guarantee of ‘funding adequacy’ and protected in statute - which would continue to hold responsibility for the mechanism by which the BBC’s funding is determined (i.e. reformed Licence Fee or other model). The expert members of the IFC would be appointed by the Independent Appointments Commission

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

16 Demos (2026) Our BBC. Recommendation 4.1.1, p39

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

18 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/sites/policy_lab/files/anchor_-_strengthening_the_institutions_-_2025.pdf

19 Demos (2026) Our BBC. Recommendation 4.1.3 p40

20 Demos (2026) Our BBC. Recommendation 3.10. p33

outlined above. Such a model would reflect that used by the German KEF (*Kommission zur Ermittlung des Finanzbedarfs der Rundfunkanstalten* - or 'Commission for Determining the Financial Requirements of Broadcasting Organisations').

5. A Standing Citizens' Panel should be established with defined constitutional authority within the BBC's governance.²¹

A Standing Citizen's Panel would deliver on a new commitment within the Charter to, as the DCMS Green Paper aimed for, "meaningfully involve citizens in the governance of the BBC." This should be an independent body, created at arm's length from the BBC and from Government, with an expert host organisation selected through public tender acting as its secretariat. The purpose of this body is to increase the independence of the BBC as a whole, and of the Board and Executive in particular, by bringing public judgement and voice directly into the governance process - not mediated through consultation or other methods, as in the past.

The Panel should consist of 100-120 members, who will be recruited by civic lottery/sortition, geographically and demographically stratified to represent the UK public as a whole, and serving staggered 2-year terms. In order to ensure as wide and diverse participation as possible, the Panel will remunerate members, as well as making provision for caring responsibilities, travel, and other accommodations that might otherwise be barriers to genuinely diverse participation.

The Citizens' Panel's role (unlike, for example, the Audience Councils abolished in 2017) is not to feed back on content or programming, and does not require a pre-existing interest in or support for BBC services, but is to deliberate on high-level questions - including BBC strategic priorities, budget priorities, and performance. As a governance complement to the Board, it should have "comply or explain" powers, meaning that the Board must respond publicly to the Panel's recommendations, confirming where it will adopt and implement its recommendations, and justifying with a full published explanation those from which it chooses to deviate. This preserves Board accountability, while ensuring its substantive responsiveness - a factor that has been shown to increase trust in institutions implementing such deliberative bodies. The Panel would have an input role into both the terms of periodic Operational Reviews of the BBC led by the Independent Funding Commission, and into the evidentiary process for determining the BBC's funding settlements.

²¹ Demos (2026) Our BBC. p42-59; See also Demos (2026) Our BBC: FAQ for citizen participation in BBC governance recommendations. https://demos.co.uk/wp-content/uploads/2026/02/BBC_Citizen-Participation-FAQs_2026_Feb.pdf

QUESTION 9

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

- Improving the way the BBC communicates important information so it is clear, concise and able to be understood by everyone
- Requiring the BBC to communicate important information better to industry stakeholders, particularly to other UK broadcasters
- Requiring the BBC to communicate more information about its complaints process, particularly to those who submit complaints
- Requiring the BBC to communicate more information about the process for selecting which programmes should be made and broadcast
- Requiring the BBC to communicate more information about its editorial decisions
- Other, please specify [free text limited to 200 words]

Greater transparency is needed surrounding how the BBC Board and its leadership are appointed, and by which factors its funding is determined. These can be remedied first by creating an Independent Appointments Commission that uses a professional and expertise-based board appointments process, fully independent of ministerial influence. Second, an Independent Funding Commission should be created and should 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 should be binding upon the government, which must then provide the correct amount of funding through appropriate mechanisms.

The BBC's AI transparency standards could also be strengthened with: a clear taxonomy of the AI use cases; a formal reporting process for 'AI incidents'; consequences for breaches of the AI transparency policy; an AI transparency impact report that adjoins the BBC's annual reporting; and FAQs and videos that explain the AI use cases.

The BBC should also consistently update its Editorial Standards and practices, and should consider particularly how greater transparency over its editorial and journalistic methods could help build both greater trust and media literacy, without undermining the BBC's editorial or creative freedom or autonomy.

- No changes are necessary
- Unsure or no opinion

Demos rationale

The most consequential gaps in transparency at the BBC are at the governance level where there is significant ministerial discretion and only limited transparency to the public. This opacity would be changes that would also improve levels of accountability detailed above for Question 8:

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- 1. Establish an Independent Appointments Commission that would create an independent, professional and expertise-based board appointments process, fully independent of ministerial influence or control.²²**
- 2. Establish a BBC Governance Conduct Panel.²³**
- 3. Establish an Independent Funding Commission (IFC) independent of ministerial or Treasury control.²⁴**

Artificial Intelligence is fundamentally reshaping how news and information is created, distributed, discovered and interpreted.²⁵ Transparency surrounding the BBC's uses of AI are crucial to public trust in its content, as well as for facilitating AI literacy among the public and role modelling best practice to other newsrooms across the UK. While the BBC's AI transparency standards are described in their public pages describing their AI Principles and in the description for how the BBC uses AI, its approach could be strengthened further in the following 5 ways:²⁶

- 1.** Provide a clear taxonomy of the different audience-facing and non- audience-facing AI use cases at the BBC.

Such AI use cases could include e.g. internal operations, news, broadcasting & entertainment, research and education. For each AI use case, the BBC would ideally list the different types of disclosure requirements for each and who within the BBC is responsible for such disclosures.

- 2.** Clarify the formal reporting process for 'AI incidents'

It is likely that with greater AI use, tools will produce errors that will reach audiences. These could include, for example, misattribution or factual inaccuracies. There should be a clear mechanism for where or how the public reports these errors. This may be the typical complaints mechanism, but complaints that relate to the use of AI should be clearly identifiable.

- 3.** The BBC should define the consequences for breaches of its AI transparency policy;

If there is a breach of the AI policy, it should be clear what actions the BBC might consider taking. For example, this might include content takedowns or potentially additional editorial training.

- 4.** The BBC should produce an AI Transparency Impact report.

An AI transparency impact report could adjoin the BBC's annual reporting. It would ideally cover: how often AI is used and where, a summary of incidents (kinds and rates), a summary of audience complaints related to unclear AI disclosures, and trends in audience understanding/trust resulting from clear, unclear, or missed disclosures, as well as any additions / updated to the BBC AI use-case taxonomy.

22 Demos (2026) Our BBC. Recommendation 4.1.1, p39

23 Demos (2026) Our BBC. Recommendation 4.1.3 p40

24 Demos (2026) Our BBC. Recommendation 3.10. p33

25 Reuters Institute (2025) "AI adoption by UK journalists and their newsrooms: surveying applications, approaches and attitudes." <https://reutersinstitute.politics.ox.ac.uk/ai-adoption-uk-journalists-and-their-newsrooms-surveying-applications-approaches-and-attitudes#header--3>

26 BBC (2025) AI Principles <https://www.bbc.co.uk/supplying/working-with-us/ai-principles/>; BBC AI Transparency (2025) <https://www.bbc.co.uk/supplying/working-with-us/ai-transparency/>

5. Support critical AI literacy and disclosures with educational materials.

The BBC should empower citizens with an understanding of how AI is used at the BBC with educational materials, such as public-facing FAQs and short explainer videos. These would explain each of the AI use cases so that audiences can understand how the content they consume has been produced, altered or mediated by AI tools.

Finally and more broadly, the BBC should also consistently update its Editorial Standards and practices, and should consider particularly how greater transparency over its editorial and journalistic methods could help build both greater trust and greater media literacy, without undermining the BBC's editorial or creative freedom or autonomy.

QUESTION 10

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

- It allows the BBC to be free from government or political influence in the content it releases
- It allows the BBC to be impartial when reporting on elections, government policies, and political parties
- It allows the BBC to hold government to account and/or be critical of government
- It allows the BBC to be editorially independent and make the final call on what stories to cover and how to cover them
- It allows the BBC to pursue its own agenda, without interference, so it can provide content that serves audiences across the UK
- Other, please specify [Free text]

The BBC's editorial, creative, operational and technological independence – from government, advertisers, partners, interest groups – is fundamental to the UK's epistemic security: the integrity of processes by which reliable information is produced, distributed, acquired and assessed.

- The BBC's independence does not matter to me
- Unsure or no opinion

Demos rationale

The BBC's independence is the precondition for the democratic, informational, cultural, social and national security benefits the BBC provides. Only 1 in 6 of all public media around the world, including the BBC, are classed as independent.²⁷ Countries with media vulnerable to

²⁷ Dragomir, M. (2025). State Media Monitor Global Dataset 2025. Media and Journalism Research Center (MJRC). <https://doi.org/10.5281/zenodo.17219015>

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partisanship and capture are also more vulnerable to democratic backsliding - the United States, where both public and commercial media have been targeted, being a strong and proximate example.

Demos's proposals address the need to increase the BBC's independence both substantively and visibly - through reforms to the Charter, Board, appointments, funding and citizens involvement. Specifically:

- Removing the time limit from the BBC's Royal Charter to bring it in line with other Royal Charter bodies - or at minimum setting a generational time limit of at least 25 years - in order to remove the periodic Sword of Damocles over the BBC's existence
- Reinforcing the Charter's protections of the BBC's independence through statute, such as through a 'public lock' on government proposals of fundamental changes or threats to the BBC's character or existence, by requiring supermajorities in all four legislatures of the UK, preceded by an advisory report tabled by two Citizens' Assemblies, three years apart
- Removing political appointments to the Board by moving responsibility for Board recruitment to an Independent Appointments Commission
- Replacing the current Unitary Board structure with a new Supervisory Board structure, placing a firewall between the Board and editorial matters
- Creating a Governance Conduct Panel with the power to remove Board members in the event of misconduct or other misdemeanours
- Create an independently-hosted standing Citizens' Panel as a deliberative counterpart to the Board, to consider high-level questions such as strategic direction, budget allocation, and regional priorities.

Protecting the BBC's independence unconditionally and irrevocably - through measures reinforcing its independent governance and funding, its editorial, creative and operational freedom, and protecting the BBC from capture - is critical to the nation's democratic resilience, epistemic security and national security.

The UK's national security and defence leadership have recognised this vulnerability. Brigadier Geoffrey Dodds of the UK's DSMA Committee has stated that "freedom of the media is a key aspect of national security."²⁸ The MI6 Chief's December 2025 warning of an "export of chaos" underlines that trusted information infrastructure is a frontline of national security.²⁹ At the 2025 NATO Summit, Allies committed to spending 1.5% of their 5% GDP security pledge to protect critical societal infrastructure and ensure civil preparedness and resilience - which includes media and information.³⁰

28 Dodds, Brigadier G., UK DSMA Committee, quoted in BBC Media Show, 08 January 2025 at 08:50: <https://www.bbc.co.uk/sounds/play/m002pfbk>

29 Blaise Metreweli (2025) <https://www.gov.uk/government/speeches/speech-by-blaise-metreweli-chief-of-sis-15-december-2025>

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

QUESTION 11

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

[free text limited to 200 words]

A set of interlocking measures addressing structural vulnerabilities to the BBC's independence and that undermine public legitimacy, including: (1) A perpetual Charter, removing the ten-year cycle that enables governments to extract concessions. (2) Independent commissions for appointments and funding. An Independent Appointments Commission (cf JCA) replaces ministerial Board selection. An Independent Funding Commission (cf the German KEF) uses transparent, evidence-based processes with binding recommendations. (3) Reform the Board to a Supervisory, not Unitary, structure to make it better suited to a public interest corporation. (4) A "public lock": amendments to foundational provisions require supermajorities in all four UK legislatures plus citizens' assembly advisory reports. (5) A standing Citizens' Panel, which brings the public into the governance of the BBC thus strengthening public accountability - not feeding back on content, but deliberating on high-level questions, including BBC strategy, budget allocations, and definitions of key terms like 'public interest'.

Unsure or no opinion

Demos rationale

Each of these five measures addresses a different structural vulnerability. Together they form a "defence-in-depth" approach: multiple overlapping protections that cannot be compromised by the failure of any single protective measure.

- 1. Perpetual Charter:** The BBC is the only significant UK public institution whose continued existence depends on a periodically renewed Charter. If the Charter is not actively renewed, the BBC ceases to exist. This creates recurring political leverage. In 2010, George Osborne froze the licence fee and forced the BBC to absorb the cost of the World Service and S4C, amounting to a real-terms 16% cut.³¹ In 2015, he forced the BBC to absorb £745m in over-75s licence fee concessions, adding a further 14% real-terms cut.³² In both cases, the leverage derived from the Charter cycle itself, and the leeway given to the Secretary of State and the Treasury to amend the size of the BBC's settlement at their discretion. A perpetual Charter removes this existential vulnerability.
- 2. A 'public lock' on the BBC's existence:** in both the Charter, and in Charter-reinforcing statute, safeguards should be put in place to ensure that any attempts by government to change the fundamental nature of the BBC, or threaten its existence, have to meet a high threshold of democratic consent - in a similar way to the 2013 Royal Charter for the Press Recognition Panel, reinforced in Section 96 of the Enterprise and Regulatory Reform Act. In the case of the BBC, given its centrality to the nation's democratic, cultural and information infrastructure, this threshold should be very high - so proposals would need to achieve supermajorities in all four UK legislatures, in votes that would only be permitted after the first of two Citizens' Assemblies had deliberated on the proposals and tabled a report to

³¹ Demos (2026) Our BBC, pp.26–27. Robinson, J. and Sweney, M. – 'BBC budget cut by 16%', The Guardian, 20 October 2010.

³² In 2015, Osborne forced the BBC to absorb £745m in over-75s licence fee concessions. Demos (2026) Our BBC, p.27.

Parliament. A second, new Assembly would convene three years later to reconsider and to table a further report to Parliament, after which the four legislatures would again need to achieve a supermajority. In this way, it would be made clear that the people's voice should be directly heard in existential decisions about the media organisation that exists to serve them.

- 3. Supervisory Board, not Unitary:** the Supervisory board model - or an adapted form of it that addresses the challenges of previous Board models - is much better suited to the public service model of the BBC, and the public interest nature of its Board's responsibilities.
- 4. Independent Commissions for Appointments and for Funding:** The two primary vectors through which government and political pressure currently affects the BBC most materially as through political appointments to its Board, and the determination of how much funding the BBC will receive in its next settlement (with a guarantee in the Charter of 'funding adequacy'). There are readily available, robust precedents in the JCA model for appointments and the German KEF model for funding. The Funding Commission's determinations should, as specified in the Charter, be binding on the government, which will have responsibility for raising the required amount through a mechanism that it determines.
- 5. A standing Citizens' Panel, as outlined in detail in our response to Q8.**

It may also be crucial for the BBC - with government support - to pursue technology supply chain independence. This may be through one-off investment to enable switching to more sovereign infrastructure and restoring some of the technology and R&D capacity lost through cuts.

CHAPTER 2

DELIVERING SERVICES FOR THE PUBLIC GOOD

QUESTION 12

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

- Transparently explaining its own use of AI, for example, in the creation of content and services
- Having new requirements (for example, transparency obligations), to set the ethical standards for AI's use in public service media organisations
- Teaching audiences how to recognise where AI has been used, and to critically assess the reliability of information and content
- Helping audiences to use AI themselves, for example, teaching them basic prompting skills
- Find innovative uses of AI to drive efficiencies within the BBC and in the wider media sector
- Act as a bridge between AI companies and smaller public service media who have less time and money to negotiate, helping to support wider collaboration
- Other, please specify [free text limited to 200 words]

The BBC should be properly resourced to develop a range of AI tools that improve existing services and develop new ones to bring more value to the public and wider PSM ecosystem, including smaller organisations. This should include the policies, frameworks, and programmes necessary to ensure the technology's successful development and deployment. For example, overarching policy development, training programmes, experimental cohorts, experiments 'in the open' to engage the public at every step, and shared learning spaces for a diversity of UK

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ecosystem players. Compute capacity would be a critical enabler for this development. It would also be vital for the BBC to engage with the Citizen's Panel (proposed in Q7) to define the scope of its investment for public good AI.³³

The BBC must continue to play a leading role to shape enforceable industry standards that govern how AI companies use publisher content and prioritise public good, given the negative impacts of unlicensed scraping on publisher sustainability, poor transparency and provenance standards, limited progress on prominence of trustworthy sources, and sparse and poorly enforced regulation.³⁴ The BBC has already co-launched the initiative, SPUR; adoption of enforceable standards must come before selling or licensing its own data for training purposes.

- The new Charter should not introduce obligations around AI for the BBC**
- Unsure or no opinion

Demos rationale

The BBC has a rich history as an innovator of technologies for the public benefit and a vehicle for transforming how the UK engages with information. No other institution holds the same position as the BBC, with public trust, existing infrastructure, brand recognition, reach, rich historical data, and deep expertise. The BBC should therefore be a primary vessel for the UK's ambition for supporting digital growth, expansion, and sovereignty. The securing of our information supply chains is more vital than ever and the BBC should be seen as a cornerstone in the UK's priorities, building our epistemic public infrastructure and sovereignty alongside the other key priorities of its strategy, like building out domestic compute capacity and digitising public services.

Drawing on its history as an innovator and catalyst and as AI becomes a more prominent medium for access to information, the BBC's R&D team should further invest in developing a range of AI tools that improve and build upon its own services as well as providing new and bespoke products to bring more value to the public. This is important in order to maintain the BBC's universal access and appeal in the digital age and to support the whole public service media ecosystem, including smaller players, to thrive within it. The R&D team's focus should not just be on the technical development, but also the institutional i.e. including the policies, frameworks, and programmes that the successful development and deployment of this technology depends on. For example, overarching policy development to create shared frameworks for experimentation, training programmes for public service media workforces, experimental staff cohorts to test new technologies in controlled environments, experiments 'in the open' to engage the public at every step, and shared learning spaces for key players in the UK ecosystem. Open-sourcing aspects of this technology could also be a means to facilitate greater transparency and public auditability as well as enabling innovation across the PSM ecosystem, including for smaller and local providers.

As noted by the British Broadcasting Challenge and other stakeholders, spectrum was gifted to the BBC in order to enable it to exploit it for maximum public benefit. The contemporary digital equivalent of this would be, for example, to provide the BBC with compute capacity to

³³ Demos (2026) Our BBC. p42-49. https://demos.co.uk/wp-content/uploads/2026/01/Our-BBC_Report_January-2026.pdf; See also Demos (2026) Our BBC: FAQ for citizen participation in BBC governance recommendations. https://demos.co.uk/wp-content/uploads/2026/02/BBC_Citizen-Participation-FAQs_2026_Feb.pdf

³⁴ CSI Magazine (2026) "UK news giants launch SPUR to set AI Content rules". <https://www.csimagazine.com/csi/uk-spur-ai-launch.php>

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exploit in the public interest, and to replace spectrum. This compute capacity would be a critical enabler for both the BBC and the wider PSM ecosystem.

Given the importance of maintaining trust in the BBC's impartiality and accuracy, the investment of its funding in the public interest and the current low trust in AI services among the public, it would be vital for the BBC to engage with the Citizen's Panel to define the scope of its investment for public good AI (as proposed in Q8 and 11).³⁵

There is a possibility that the BBC, like many other news media organisations, may consider selling or licensing its archival data for the sake of training other companies' AI models as a means of generating new revenue streams. Given the negative impacts of unlicensed data scraping on news publisher sustainability, the poor transparency and provenance standards of existing dominant AI chatbots and search services, the limited progress on prominence of trustworthy sources, and the sparse and poorly enforced international regulation of AI companies, the BBC must prioritise playing a leading role (as it is with SPUR) to shape enforceable industry standards that govern how AI companies use and fairly remunerate publisher content and develop and deploy AI for public good.

Progress must be made on strong standards around data usage here before the BBC considers any licensing of its own data for the training of AI models. This role in shaping enforceable standards and streamlining licensing arrangements is crucial for enabling a higher quality, more pluralistic and trustworthy information environment for the UK public overall and for the survival of smaller local and independent public service media organisations who are likely to otherwise struggle to agree individual licensing agreements. While it is positive that the BBC has already announced such an initiative, the successful adoption of these enforceable standards must come before the BBC considers these broader data licensing questions.³⁶

Finally, the new Charter should not introduce specific obligations around AI for the BBC as this would duplicate the sixth technology Purpose we have recommended (at Q1) that reintroduces former language used in the Charter in 2007–2016. This stated that the BBC should “deliver to the public the benefit of emerging communications technologies and services” and with the updated amendment “and infrastructure, to enhance the quality and sovereignty of our democracy”.³⁷

35 Demos (2026) Our BBC. Demos (2026) Our BBC. FAQ for Citizen Participation. https://demos.co.uk/wp-content/uploads/2026/03/BBC_Citizen-Participation-FAQs_2026_Feb.pdf

36 CSI Magazine (2026) “UK news giants launch SPUR to set AI Content rules”. <https://www.csimagazine.com/csi/uk-spur-ai-launch.php>

37 Demos (2026) Our BBC. Recommendation 3.2, Page 30.

QUESTION 13

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

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

The BBC's principle of universality must also extend to universality of appeal. As audiences' needs evolve and diversify, as should the BBC's content. The model of the BBC's recent partnership with YouTube, where it will produce public service content specifically tailored in tone, style and format for this third party platform and its younger audience and that this content will also be available on BBC's iPlayer and Sounds platforms is one that could be pursued with a range of partners. Assuming such a partnership has provided a fair and sustainable value exchange, this example demonstrates the direction the BBC should be committed to to secure content on BBC platforms that can meet the constantly evolving needs of a diverse range of audiences.³⁸ This partnership model could be extended to public service broadcasters and other third party platforms where content meets Ofcom standards.

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

38 BBC (2026) "BBC to make shows for YouTube in landmark new deal". <https://www.bbc.co.uk/news/articles/c0q4521pg28o>

QUESTION 14

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

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

QUESTION 15

Reflecting on your response above, please explain why you agree or disagree that the BBC should make greater use of third party platforms to share its content. Please provide relevant evidence, where possible.

[free text limited to 200 words]

To ensure universal access, the BBC should distribute its content via third-party platforms, but treat news and audio content and premium televisual content differently. There are differences in financial value and cost of loss of attribution, credit and value from content producers to platform owners.

To facilitate a higher quality information environment and universal access, the BBC should by-default distribute all its news and audio content to third-party platforms. The BBC's televisual content should also be distributed to third-party platforms to provide universal access and to encourage journeys back to BBC products. According to some measures, YouTube receives more viewers than the BBC.

However, the BBC should secure attribution and value on these platforms. Platforms could extract financial and reputational benefits from BBC content on their platforms that reinforces the uneven playing field between PSBs and platforms. As such, deals with platforms should allow the BBC to secure ad revenue against their content, like the ITV and Channel 4 deals with YouTube. How public service media content appears, in what context, against what advertising, and with what universality and accessibility standards, will also be key factors in ensuring that such agreements continue to bring public benefit as well as growth.

Demos rationale

To ensure universal access, the BBC should distribute its content via third-party platforms, but treat news and audio content and premium televisual content differently. There are differences in financial value and cost of loss of attribution, credit and value from content producers to platform owners.

To facilitate a higher quality information environment and universal access, the BBC should by-default distribute all its news and audio content to third-party platforms. The BBC's televisual content should also be distributed to third-party platforms to provide universal access and to encourage journeys back to BBC products. Evidence suggests that, according to some measures, YouTube receives more viewers than the BBC e.g. in Q4 2025 51.9 million viewers compared to BBC's 50.9 million viewers.³⁹ Channel 4 has found their partnership with YouTube has enabled them to reach new audiences without a loss of viewers from their own platform.⁴⁰

However, the BBC should secure attribution and value on these platforms. Platforms could extract financial and reputational benefits from BBC content on their platforms that reinforces the uneven playing field between PSBs and platforms. As such, deals with platforms should allow the BBC to secure ad revenue against their content, like the ITV⁴¹ and Channel 4⁴² deals with YouTube. How public service media content appears, in what context, against what advertising, and with what universality and accessibility standards, will also be key factors in ensuring that such agreements continue to bring public benefit as well as growth.

QUESTION 16

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

- A renewed focus on accuracy and impartiality
- More clearly marking when content is news versus where it is opinion
- Robust and transparent editorial guidelines applied consistently
- Greater explanation of the editorial and journalistic decisions taken when reporting the news
- Greater transparency when mistakes and errors are made
- More effort to be made in taking into account the public's views in its news coverage
- Reporting more news stories which are local to you

39 Kanter, J. (2025, 13 January). 'YouTube Makes UK Ratings History By Beating BBC On Audience Reach'. Deadline: <https://deadline.com/2026/01/youtube-beating-bbc-barb-viewing-ratings-1236680843/>

40 Channel 4 (2022). Channel 4 and YouTube strike pioneering content and commercial partnership. <https://www.channel4.com/press/news/channel-4-and-youtube-strike-pioneering-content-and-commercial-partnership>

41 ITV (2024). ITV and YouTube Announce New Partnership. See: <https://www.itv.com/presscentre/media-releases/itv-and-youtube-announce-new-partnership>

42 Channel4 (2022). Channel 4 and YouTube strike pioneering content and commercial partnership. See: <https://www.channel4.com/press/news/channel-4-and-youtube-strike-pioneering-content-and-commercial-partnership>

Consultation questions and Demos answers

- Reporting more international news stories
- Highlighting stories which are not reported by other outlets
- Other, please specify [free text limited to 200 words]

Given the vulnerabilities within local information ecosystems are a threat to the democratic health of our local communities, we support the proposals of the Public Interest News Foundation who recommend an expanded BBC local news partnership:

1. A new Partnership Agreement between the BBC and the sector
2. A Continuing Professional Development (CPD) programme, administered by the BBC in partnership with the sector and journalism training bodies such as the NCTJ
3. An expanded Local Democracy Reporting Service (LDRS). As now, reporters would produce content to be shared between the BBC and local news partners, but the process for procuring local news partners would be open to a wider range of eligible local news providers
4. A new Local News Commissioning Fund (LNCF) to fund production of original journalism, including long-form and investigative stories
5. Using the BBC News product to host and bring visibility to non-BBC produced local news.

Given global democratic backsliding, the resurgence of information warfare (including from well-funded Chinese and Russian state broadcasters) and the loss or curtailment of US global media channels, we also support proposals to double the reach and budget of the World Service, funded wholly by the Government, potentially using already planned increases in defence spending.

- No changes are necessary
- Unsure or no opinion

QUESTION 17

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

[200 word text box]

1. Secure trust in the BBC in a highly polarised and volatile information environment through strengthening its accountability to the public and its political independence (see Q7, 8, 10, 11).
2. Expand the first public purpose to focus on the BBC's positive role in providing an accurate and trustworthy information environment in the UK, not a new negative purpose of countering misinformation. (See Q1)

3. Enable the BBC to be a central media literacy provider and scale-up partner to enable UK citizens to critically evaluate and participate actively as citizens and creative media producers in today's media and information environment (See Q1)
4. Reintroduce the BBC's purpose as a leader in the development of public interest technology infrastructure enabling further investment in open source AI tools as a catalyst for the public service media ecosystem. (See Q12)
5. Distribute its news and audio content to third-party platforms freely and its televisual content if attribution and financial compensation can be secured. (See Q15)
6. Secure greater local news visibility by expanding the BBC and local news partnership and global news via secure funding for the World Service (see Q16)
7. Ensure 'adequate' funding to meet and role model the highest editorial standards.

QUESTION 18

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

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

CHAPTER 3

DRIVING GROWTH ACROSS THE UK

QUESTION 19

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

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

QUESTION 20 (1)

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

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

Demos has not responded to this question as it falls outside of our area of expertise.

QUESTION 20 (2)

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

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

Demos has not responded to this question as it falls outside of our area of expertise.

QUESTION 21

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

[Free-text box; 200 words]

Unsure or no opinion

Demos has not responded to this question as it falls outside of our area of expertise.

QUESTION 22

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

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

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

Demos has not responded to this question as it falls outside of our area of expertise.

QUESTION 23

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

[Free-text box; 350 words]

Unsure or no opinion

Demos has not responded to this question as it falls outside of our area of expertise.

QUESTION 24

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

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

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

Demos has not responded to this question as it falls outside of our area of expertise.

CHAPTER 4

SUSTAINABLE & FAIR FUNDING

QUESTION 25

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

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

QUESTION 26

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

- Strongly agree - The BBC should definitely use the licence fee to fund a broad range of benefits to the UK and the creative economy.**
- Agree - The BBC should use the licence fee to fund a broad range of benefits to the UK and the creative economy.

Consultation questions and Demos answers

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

QUESTION 27

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

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

QUESTION 28

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

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

QUESTION 29

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

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

QUESTION 30

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

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

QUESTION 31

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

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

QUESTION 32

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

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DEMOS

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