

## Written evidence submitted by British Screen Forum

The BBC is a foundational and irreplaceable cornerstone of the U.K. screen sector and an essential economic and cultural infrastructure for the UK creative economy. A KPMG report found that in 2021, for every £1 of direct economic activity by the BBC, £2.63 was generated for the UK economy. The BBC is a major investor in creative output across the UK, with around 50% of its economic activity outside London and the South-East. It supports the development of talent and in 2024/5 employed 808 apprentices across the UK. The BBC has a wide and varied workforce, including directly employed, freelance and commissioned workers.

The BBC is a key commissioner of content with a ‘UK flavour’ and the lead commissioner of high-quality children’s content, local news and continuing dramas - genres currently under significant threat - which are integral to the UK production landscape in providing a training ground for cast and crew, which in turn supports the wider production ecosystem.

It is important to note, in the context of this Charter Review, that the BBC plays a core role in the rich ecology of companies, institutions and freelancers, that constitute the UK Screen Sector and draw on overlapping pools of human and physical capital, funding and support. Policymakers should take a holistic view of the effect any changes the review of the terms of the BBC Charter might have on that wider ecology – both positive and negative.

Compared to other countries, the UK’s Screen Sector boasts an unusually rich mixed ecology comprising companies that differ in size, ownership (public and private, domestic and international) and purpose. We have one of the most successful independent TV production sectors in the world, and a highly developed Public Service Media (PSM) infrastructure. This unique market for content attracts substantial amounts of inward investment by global media companies, especially the US studios and streamers, who choose the UK – with its world-class talent and infrastructure – as the home for some of their biggest projects. Competition between the different kinds of organisations, including the BBC, helps to drive innovation and growth, resulting in levels of domestic TV and film production and exports that are amongst the highest in the world.

The aim of this Charter Review should be to ensure the BBC’s funding stability, commissioning capacity and independence. Editorial independence is crucial for any media organisation to retain its credibility with those who engage with it. This is particularly the case for the BBC, which has a vital role in delivering UK cultural, social and democratic values to people living in the UK and across the world. Any changes should enhance investment in Public Service Media and the wider Screen Sector eco-system. The BBC Charter Review should focus on the BBC as core creative infrastructure and ensure that stability, scale and independence are enshrined in any revision to support sector growth, jobs and UK cultural power.

### **1. Mission & Public Purposes**

- The BBC should have a strong public service remit, particularly in culturally significant and higher risk genres.
- The BBC has a vital role in delivering cultural, social, educational and democratic value as well as economic returns and this should be reflected in the Charter review. The BBC should represent the whole of the UK in all its work.
- The BBC has an important role to play in the promotion of British culture and values outside the UK. The World Service is an integral part of this work.
- To undertake its role in delivering those values, the BBC should be genuinely independent of Government but with Charter obligations which ensure commercial decision-making respects the integrity of the wider market.
- The BBC's commissioning activity is critical to the support of diverse, culturally British content for all UK audiences. It is vital to sustaining 'at risk' areas of content production such as British independent film and children's TV.
- The BBC plays a core role in the rich ecology of companies and institutions that constitute the UK Screen Sector and draw on overlapping pools of human and physical capital, funding and support.

### **Policy Recommendation:**

A renewed Charter should articulate the BBC's public purposes clearly and ensure they remain an integral part of the BBC's operating principles. It should guarantee the BBC's independence from Government, both operationally and editorially, and consider how that independence can be assured well into the future, including the Board appointment process.

With independence should come accountability. Board roles and responsibilities should be clear, and communication of decision-making processes should be transparent. The Charter should encourage the development of improved consultative frameworks and mandate improved communication of important information such as editorial decisions and programme commissioning processes.

There should be a strong focus on culturally British content and content which might not be commissioned in a strictly commercial market.

The BBC should continue promote British culture and values internationally. An important part of this work is via the World Service. Government should fully fund the World Service to free-up licence fee revenue for UK content production.

Any Charter review should clarify the BBC's obligations to ensure there is genuinely local commissioning and production across the Nations and Regions. Given the BBC's crucial role in the wider UK Screen Sector ecology, policymakers should take a holistic view of the effect any changes proposed as part of the review of the Charter might have on that wider ecology – both positive and negative.

## **2. Funding & Financial Sustainability**

- The BBC is a cornerstone investor, whose spend unlocks co-finance, sustains independent producers and supports UK IP retention.

- Any changes to the Charter which reduce or destabilise BBC funding have the potential to damage the entire production value chain.
- Any changes to the Charter are likely to have an effect on the wider Screen Sector eco-system

**Policy Recommendation:**

Any review of how the BBC is funded should result in a predictable, stable and maximally future-proof source of revenue for the BBC. The overwhelming majority of British Screen Forum members do not support advertising or subscription-based approaches to funding the BBC’s core activities, as this is likely to have a negative effect on the wider Screen Sector and would be unlikely to deliver the resource necessary to replace any loss of licence fee. Additionally, recent research conducted for British Screen Forum member COBA by YouGov established that a subscription-based model was very unpopular with British viewers.

British Screen Forum supports the proposal in the DCMS consultation that there should be licence fee concessions for households facing financial hardship. Furthermore, there should be robust, technology-supported enforcement processes to ensure those people who should be paying a licence fee comply with that obligation. Any possible funding reform should be assessed against a sector-wide impact test and should ask the following questions:

- Does the proposed change preserve the BBC’s ability to commission UK content at scale and take creative risk?
- Will any change to the funding approach support the wider Screen Sector and encourage continued inward investment?
- Will existing structural agreements, such as Terms of Trade and agreements with unions, be protected?

**3. Jobs & Skills**

- The BBC acts as a skills incubator for the industry and plays a strong role in workforce development across the UK. It demonstrates strong commitment to the principles and use of the ScreenSkills Training Passport and to children’s TV production and training via the ScreenSkills Children’s TV Fund.
- BBC commissioning underpins career entry points and progression that benefit the whole sector, including inward investors but experts in Screen Sector training and development note that it is more difficult to access training and continuing professional development at all stages of a career in television than was previously the case.

**Policy Recommendation:**

The Charter should explicitly recognise the BBC’s contribution to skills pipelines and good jobs across the UK and put measures in place to secure this contribution and support further development in this area. The Charter should recognise that the BBC’s commissioning and operational decisions, as well as responding to the needs of its audience, should also respond to the needs and well-being of its workforce, including freelancers, and recognise trade unions as essential partners in guaranteeing good jobs across the UK.

**4. Nations & Regions**

- BBC commissioning activity is crucial to the support of regional production ecosystems, supply chains, training and employment. Commercial market forces alone are unlikely to deliver the same result.

- Supporting local languages across the Nations is integral to the BBC’s role in reflecting the full breadth of the UK’s cultural identity. The success of programmes like ‘An t-Eilean’ (The Island) and ‘Un Bore Mercher’ (Keeping Faith) provides strong evidence of the market across the UK for content in the UK’s local languages.

**Policy Recommendation:**

Regional expectations in the Charter must be matched with funding certainty to avoid hollowing out regional capacity. With any additional funding should come clear undertakings on what constitutes genuinely local commissioning and production. This should include investment in local language content, which strengthens regional production ecologies, deepens audience engagement and contributes to the preservation of linguistic and cultural heritage that would not be sustained by commercial market forces alone.

One of the BBC’s core goals, reflected in its ‘Across the UK’ programme is moving staff, programming and decision-making away from London and the South East. The Charter Review should support these goals by introducing measurable targets for these activities, as well as outlining a process of meaningful engagement with National and Regional screen bodies to improve commissions, employment and training across the UK.

**5. Market Impact & Competition**

- BBC investment should be viewed as catalytic rather than distortive, enabling projects that would not otherwise proceed without its funding
- The BBC’s commissioning activity has positive spillovers: skills, IP retention, export readiness etc.

**Policy Recommendation:**

The BBC should be encouraged to think creatively about strategic partnerships both within the UK and internationally, with both PSM and commercial content providers. Market impact assessments should be flexible enough to encourage activities which bring net ecosystem benefits but robust enough to challenge the potential negative effects on the wider industry of any activity in this area.

**6. Digital Transition & Discoverability**

- Viewer behaviour is changing and viewers are increasingly accessing content online rather than via more traditional broadcast routes. Broadcasters are partnering with online platforms to make their content available where their potential viewers are.
- The use of new technologies, including AI, to create content is likely to grow significantly in the near future.

**Policy Recommendation:**

The Charter review should be undertaken with a clear understanding of the context broadcasters, including the BBC, will be operating on in the future, including how content is produced and how audiences navigate myriad content choices. The freedom to make commercial deals to place content on digital platforms should be included in the BBC’s remit, partnered with an obligation to consider what the effect of any deal will be on the wider ecosystem, including the effect on audience preferences. Commercial deals should not negatively impact secondary rights arrangements that enable creators to be fairly remunerated for the use of their work.

The Charter review should include a commitment from the BBC to abide by an ethical and transparent rights-based approach to artificial intelligence (AI), including artists' image and voice rights.

Consideration should be given to ensuring discoverability of BBC and other PSB content, as access to audiences is integral to sustaining the balance of the UK content production eco-system.