

# BLACKBURN AND DISTRICT TRADES UNION COUNCIL

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**Response to consultation on:  
“Britain’s Story: The Next Chapter - the BBC Royal Charter Review, Green  
Paper”**

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Blackburn and District Trades Union Council is a local Trade Union body, registered with the Trades Union Congress, comprising delegates from Trade Unions with members working or living in the Boroughs of Blackburn with Darwen and the Ribble Valley.

Our area of responsibility overlaps, in whole or in part, the Parliamentary constituencies of Blackburn, Rossendale and Darwen, Ribble Valley, and Clitheroe and Pendle.

We are electing to respond to this consultation by email, rather than by completing the online survey, because we believe that the survey does not allow us to structure our response in what we regard as the most appropriate matter. The lists of possible measures sometimes to contain elements that might be interpreted in practice in different ways, and the "free text" allowance appears insufficient to place them in any context

Where we can, we will indicate answers to the survey questions - but not necessarily in the order that they are presented.

The Green Paper's concern for "trust" in the BBC strikes us as being an example of how the most significant currents in British political life relate to circumstances on the "right" of the political spectrum, and particularly to a seam of disgruntlement that has engaged, in various ways, the Conservative Party, UKIP, the Brexit Party and Reform UK.

The "left", of course, have been complaining for donkey's years that the BBC is instructionally inclined to favour an "establishment" point of view - going back at least as far as the work of the "Glasgow Media Unit".

Tom Mills, author of "The BBC: Myth of a Public Service" writes ([The Myth of the BBC · Learning on Screen](#)):

*"Can social science settle some of these disputes about the BBC's political orientation? There is in fact a fairly substantive body of scholarly work on the BBC reporting, and none of it supports the ubiquitous claims from conservatives that the BBC is left-wing. One of the most extensive pieces of content analysis in recent years was conducted for the BBC Trust by Cardiff University. This research, amongst other things, examined the BBC's coverage of immigration and the EU – two of the most divisive issues in British politics. What researchers found was that conservative perspectives were more prevalent in BBC reporting, and that while the balance between the two major political parties tended to be broadly equal, Conservative featured more regularly than Labour. This rightward leaning reporting has also been confirmed in analyses of guest appearances on programmes like BBC Question Time, and a forthcoming piece of research has confirmed that the right has a slight edge in terms of political guests on BBC programme, and interestingly that the BBC favours right-wing over left-wing Labour MPs, and the right of the Conservative Party over more moderate Tories – not quite the centre ground some have assumed that the BBC adopts. Academic research on the BBC's coverage of the referendum by Loughborough and Cardiff, meanwhile, has found that while the BBC struck a careful balance between the two sides in the referendum, the whole debate was markedly dominated by the Conservatives and UKIP.*

*"The best evidence, then, suggests that BBC reporting, far from being biased to the left, is slightly biased to the right. A more striking and consistent finding from scholarly research, though, is that the BBC overwhelmingly defers to official politics, taking its cue from Westminster and the broader world of elite policy making, and to a lesser extent business representatives".*

In 2016 the Report "**Should He Stay Or Should He Go**", by the Media Reform Coalition jointly with the Department of Film, Media and Cultural Studies at Birkbeck, University of London, used quantitative analysis to show that, during a period of dispute about the leadership of the Labour Party, critics of Mr Jeremy Corbyn were given twice as much airtime as his supporters, and that the issues mobilised by his critics were given much greater prominence. The researchers also noted the pejorative language BBC reporters used to describe Mr Corbyn, his team and his supporters.

In 2017 Justin Lewis & Stephen Cushion published a study in “Journalism Studies”, **“Think Tanks, Television News and Impartiality”**, which argued that a review of over 30,000 BBC news and current affairs programmes between 2009 and 2015 showed that in 2015, when the Conservative Party was in government, appearances by or references to “right-leaning” think tanks outnumbered “left-leaning” think tanks by around two to one: *“our findings add weight to a pattern emerging from a number of recent academic studies that show, despite its undoubted commitment to impartiality, BBC news programming has shifted its centre of gravity to the right”*. (One might add that we would not see some of the organisations cited as “left-leaning” in quite the same light, whilst some definitely “left-leaning” organisations get no look in at all. Whilst we know of no equivalent study, our gut reaction is that the use of journalists on programmes like “Politics Live” further tilts the dialogue. We get, for instance, journalists from “GB News”, the “Sun” and the “Daily Mail”, but rarely, if ever, anyone from the “Morning Star”).

All this has been water off a duck's back.

But, it seems to us, right-wing dissatisfaction is now finding a great deal more traction. Why the difference? Maybe because the critics of the left still fall in line to defend the “idea behind” the BBC, even whilst they are complaining about it - whilst the critics of the right are more inclined to threaten to undermine it. Maybe because the right-wing criticism is more tightly bound to social viewpoints that are driving how people vote. And maybe, despite their claims to represent views that have been marginalised and overlooked, because they actually have powerful media and financial backing.

We feel it is important that in forming future policy and actions we should acknowledge this context.

The underlying reality is that the BBC’s competitors have long complained that the BBC is using its dominant position in the British media landscape to strangle opposition, both in traditional broadcasting and in the digital space. As Julian Petley commented in 2015 [How the Murdoch press has waged a relentless campaign against the BBC \(and why it’s worked\)](#): *“Ever since Rupert Murdoch decided to enter the television game in the early 1980s, his newspapers have waged continuous war on public service broadcasters, and on the BBC in particular. These he sees purely as rivals in the broadcasting marketplace, and when Murdoch spots rivals his instinct is to exterminate them ...”*.

In 2004 "**New Frontiers**", whose Director was Dominic Cummings, commented:

*"There are three structural things that the Right needs to happen in terms of communications...*

*1) the undermining of the BBC's credibility;*

*2) the creation of a Fox News equivalent / talk radio shows / bloggers etc to shift the centre of gravity;*

*3) the end of the ban on TV political advertising (an enterprising donor with a few hundred thousand pounds would do more to help the Conservative Party by funding a legal challenge of this ban than he ever could by donating direct to the CP)".*

*"You wouldn't want the BBC to completely crowd out national newspapers. If you look at the BBC website it is a good product, but it is becoming a bit more imperial in its ambitions"* said Conservative Chancellor, George Osborne.

For us, the situation we face is yet one more iteration of the broader public ownership/privatisation dichotomy. The need of the moment is that we defend a dependable public asset, which provides the public with positive benefits, from persons who want to dismantle or weaken it for a combination of political and commercial reasons, so that they may create market opportunities to further line their, or their mates', pockets and develop new channels for ideological manipulation, at the price of loss of quality and depth as the broadcasting space is flooded with dross.

We want our national broadcaster to be big and strong and to offer a comprehensive and diverse service across a whole range of genres and media. We also want this offer to be "free to air". We want these things because we believe they are the best way for us to continue to receive the range and quality of programmes to which we have become accustomed. We believe that they also deliver a range of wider cultural and social functions.

Freedom from a direct commercial relationship with any one audience means the BBC serves the public as a specific end and that it has the space to reflect the needs of everyone not just a few. This generates wider choice. It also allows for "information" and "education" alongside "entertainment". Freedom to air

means that these things are available equally to all citizens able to afford or access receiving equipment.

James Heath, BBC Director of Policy, has written that the BBC has: *“an instrumental purpose: to deliver external benefits to society through, for example, creating a richer culture, promoting democratic debate and building a stronger sense of community through shared experiences. We know that the market works best when it includes a successful public service broadcaster; far from crowding-out commercial players, public service broadcasting supports their growth”*.

Claire Enders, of Enders Analysis Limited, has written that: *“a well-funded national broadcaster serves British audiences and the British economy by contributing to a ‘virtuous’ cycle of investment and competition. As a result, Britain has four global players in content creation and exports - the BBC, ITV, Channel 4, and BSkyB - more than any market apart from the US”*.

Sir Peter Bazalgette, Chair, Arts Council England, told the House of Lords Select Committee on Communications that: *“the BBC makes a massive investment in original programming, which has huge significance for our culture and our national conversation, but also for our creative industries. In fact, it makes the largest investment in original programming of any of the broadcasters”*. He regarded this as *“crucial to the health of the creative industries, which are of national importance because they are now, as defined, 5 per cent of the economy”*.

The NUJ told the same Committee that: *“every £1 of licence fee spent by the network generated £2 of economic activity in the creative sector”*. The musician, Cerys Matthews, put the matter more personally: *“To get a measuring stick for the importance of the BBC, culturally speaking, you would have to go away from Britain and spend time in countries that do not have an equivalent public broadcasting service. I have spent time in Australia and can report that Australians are very envious of the BBC. I have lived in America for six years, a year of that in South Carolina and five years in Tennessee. It was during those years that I truly felt the true value and extent of what the BBC gives us culturally”*.

In 2005, the House of Lords Select Committee Report on the BBC Charter Review noted that: *“The BBC is also important for its role in developing national talent in broadcasting—many directors, scriptwriters, actors and technical staff owe*

*the opportunity to develop their skills to the BBC. And its importance is underlined by the fact that it is one of only two UK television companies that cannot be bought out by foreign investors (the other being Channel 4)".*

We expect the BBC, as our national broadcaster, not only to encourage talent, but to also maintain good employment standards and to be responsive to strategic economic objectives. One concern we have is the extent to which internal production capacity has, over time, been eroded in favour of "commissioning" programmes from third parties, where there is less control over these issues.

We are glad to see that the general tone of the Green Paper is one of supporting the basic purpose of having a public broadcaster, but some of the things it most focusses on may be seen as not, in fact, being the main issues.

It seems to us, for instance, that the issues raised in the survey themselves, arising out of Chapters 1) and 2), display the gravitational pull of right-wing criticism, not really creating a space for affirmation of the positive reasons why there is an argument for having a public sector broadcaster.

Whilst there is substantive merit in the issues of "talent conduct" and "fair wages", these matters are entirely irrelevant to the point at issue.

We do agree that the BBC *"as a national institution, with its significant resources and its central role and influence in the creative economy, should continue to seek to go beyond minimum standards"* - but this should apply beyond "individual" matters to embrace how the organisation deals with Industrial Relations, and also address reversing recent trends to "outsource" production.

**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?**

- Agree - New requirements on the BBC to improve workplace standards should probably be introduced.

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

*The issue of the difference between "high" and "normal" remuneration is a matter of strong general interest to us. It is, however, an issue that affects many sectors, and it is a matter that is quite irrelevant to the issues that the Charter should cover.*

The questions of "accountability" and "independence" seem wider to us than just matters of managerial structure.

As we indicate above, we see the BBC as displaying a persistent and ingrained inclination to present its news and current affairs coverage largely from the point of view of a consensus from which we are excluded. This shows in several ways; what is seen as being newsworthy, the hierarchy of the news agenda, the words used to describe events, the implications behind questions raised, the range of people and organisations turned to for commentary.

How, then, do we approach "accountability" from the perspective of asking "*who is accountable for the way the BBC sees the world?*". We suspect that outcomes here are determined by far more than just editorial decisions, and that what matters are quite entrenched social patterns - class, connections and education/career pathways all serve to filter the workforce as much by attitude as by ability. Lewis Goodall writes in his Substack ([The truth about impartiality at the BBC - by Lewis Goodall](#)) about "*people, inside and outside of the BBC who are in my experience most rigid of all, because they are so convinced their politics isn't really politics, but just some default setting shared with much of the country- when it is not*". But he also mentions more direct pressure: "*As I've recounted before, Gibb*" (Sir Robbie Gibb, Non-Executive Director and formerly Theresa May's director of communications) "*has long generated dissatisfaction among BBC staff for ranging beyond his brief and interfering in matters in which he has no business. I was warned by BBC executives that he was "watching you" while I was at the corporation....*". It is admittedly just an impression, but for all the Daily Mail's vapours there it feels like there is in reality much less intrusion from questioning, working-class, "disrupters" than there was in the 1960s and 1970s.

Some significant recent decisions have revealed the influence government can have even whilst maintaining that the BBC is "independent". The Green Paper speaks of the public dissatisfaction we think undoubtedly existed in relation to the changes made to (or the evisceration of) local radio. But from our point of

view this was at least as much a matter for which the Government of the day should have been held "accountable". It seems unlikely to us that this decision would have been taken if the Corporation had not been forced to make "savings", not only because of the fall in licence fee revenue but also because of being forced to absorb a cut of £650 million through the transfer to it of the cost of giving free TV licenses to the elderly.

Of course, the BBC Board could still have responded by cutting other things instead, but considering "*whether there should be a change to the government's role in appointing board members*" doesn't do much to open up a public debate on what the alternatives might be. The options outlined in the survey are, overall, unobjectionable, but somewhat placatory. They lack specificity, and read like a mandarin fob-off.

The key question is one of how to balance independence with broad public accountability, whilst freeing the Board from political or ideological placemen. One possibility could be to give seats to civil society organisations, such as the TUC, so that there would at least be a reasonable spread of interests represented.

The BBC's "independence" is also at risk of compromise through the frequency of "Charter Reviews", such as this. There may be a benefit to them, insofar as they remind the Corporation that it should, in the final analysis, be publicly accountable. But at the same time, they open the possibility of a recurring argy-bargy and of the Corporation always being wary of giving offense to the state. So maybe a permanent Charter, with some provision for Parliament triggering a review, alongside a degree of Committee oversight, should be considered.

**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 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

**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
- Reporting more international news stories
- Highlighting stories which are not reported by other outlets

**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

The elephant in the room remains the adequacy of the BBC's funding. The Introduction to the **Green Paper** says: "*this Charter Review will look to ensure that the BBC has the sufficient and necessary resources to deliver high-quality services*", but there is no quantification of what this will entail or explanation of what will be done. It is also stated that "*the BBC receives a level of public funding commensurate with its role*", which implies that the current level is seen as adequate despite what the quality and service level consequences have recently been, or of how that erosion will grow increasingly evident over time.

We have concerns about the TV Licence as a "regressive" tax and would be willing to consider some alternative form of national funding. The problem we face now is that the previous Government deliberately eroded the "independence" the Licence Fee was supposed to give the BBC by using it as an instrument of correction, at the same time as there is a growing public inclination to see it as just one amongst many "subscriptions" - leading to a "*why should I pay it if I don't watch the programmes?*" attitude. For us, the consequence that flows from having an "independent" public broadcaster is that it should have a dependable funding regime that is not based on use and is as protected as it can be from a need to attract either advertisers or government approval. "Alternative" funding models, such as subscription, seem to us to fail to appreciate that we are paying for a public good, and not just for a specific suite of programmes. Subscription would, besides, mean that the BBC would no longer be seen as a universal public service, shared equally by all. Both subscription and advertising threaten to introduce incentives to prioritise popularity as the primary goal, or the preferences of those best able to pay.

Patrick Barwise, "**British Public Service Media funding after 2027**", makes the point that funding from general taxation can lead to greater vulnerability: "*Countries such as Denmark and Canada, where the Public Service Media have to compete for government funding every year, have found it harder to keep it politician-proof*". The Licence Fee is, essentially, already really a form of the

"household levy" that Barwise argues is the most equitable settlement. Though it could be re-branded and re-designed in respect of the fine detail. Perhaps it could also be supplemented with some form of media industry tax or levy. We understand, for instance, that Spain has mainly hypothecated taxes on commercial broadcasters, streaming platforms and telecom operators to support public broadcasting.

**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?**

- Agree - The licence fee should be reformed to support the BBC's long term sustainability.

**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.

**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.

**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?**

- **No advertising - The BBC should not carry any advertising on its content and services.**

**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 disagree - I would definitely not be willing to pay for a BBC top-up subscription service focused on premium and entertainment content.**

The "trade-offs" included in the answers about concessions seem almost to prohibit giving the correct answer. The point made at the time that George Osborne moved responsibility for the elderly concession onto the BBC was that this was a completely unwarranted mixing up of BBC funding and social policy, and that the concession was clearly a public, rather than a corporate, responsibility. So - yes, new concessions should, as in the second option, not impact the BBC. But how you interpret "no higher costs" for other households is a moot point. If new concessions are made, other households may bear some or all of the cost through general taxation. The point, however, is that any concessions should be paid for out of the welfare or general government budget and not represent a distribution of costs within the broadcasting fund as a tax.

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

- **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.**

**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?**

- **Neither agree nor disagree - No opinion either way.**

Given that we already see the BBC as being inclined to frame matters from a particular perspective we get a little twitchy about ideas such as "a unifying national story". National identity is like enlightenment in Zen Buddhism - as soon as you try to define it you begin to lose it.

Do groups of people, living together in a community over time, begin to show some common characteristics? It is something that humans seem generally inclined to believe. Forms of art and culture are distinguished by the societies that produced them. Talk about Ancient Egyptian art and most people will form a similar internal image. In more everyday settings, we are not surprised if people refer to a "typical Yorkshireman" or a "Jewish mother", both combining supposed characteristics of community and gender. The Bodleian Library published the "Instructions for American Servicemen in Britain, 1942" so you could have a chuckle about how they saw us, and maybe think, on occasion, "that's still true". Maybe the Americans based it on A G MacDonnell's "England, Their England"?

But the boundary between humour and damaging stereotype is not always clearly marked, and discrimination also has its roots in group characterisation. So too does a type of social manipulation, that makes use of patriotism to promote particular, and partisan, political objectives.

So, if other people come to see the BBC as a good example of our national qualities, which we think they do, then that is fine from our point of view. But we would argue against trying to achieve the object of being validated by a national identity. We would not want to be on the wrong end of that.

"Representing all audiences" can come across as clumsy and forced, particularly where it is a conscious effort to "portray" people, rather than the result of an opportunity for their self-expression. Given that there are still over 6 million Trade Unionists in Britain, we wonder what we must do to qualify as an "audience"? Has there been a 21<sup>st</sup> Century TV drama where the sympathetically portrayed protagonist was a Trade Union shop-steward?

"Representing all audiences" is also a question of accessibility. Commercial broadcasters might find it convenient to focus on certain platforms, but a public broadcaster should be expected to maintain as many ways of receiving its programmes as is reasonably practicable. Last year the "Observer" reported on a study by Mathew Horsman that "plans to switch off the UK's TV transmitters

and move all broadcasters to internet-only streaming are moving too fast and risk leaving 5.4m UK households without access to any television at all in 2035". The Digital Poverty Alliance has pointed out that the move was not just about technical availability - though this is expected to remain a problem. The metropolitan "everyone has broadband now" line ignores the reality that this strand of digitalisation introduces additional cost hurdles between the citizen and public media.

**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?**

- No opinion either way

**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?**

- Neither agree nor disagree - No opinion either way

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

- 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

**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?**

- Agree - The BBC should probably do more to spread its spending, activities and decision making across nations and regions of the UK.

**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

**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

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

- Agree - A Public Purpose aiming to support the growth of the creative economy should probably be added.

**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)
- Locally relevant programming

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