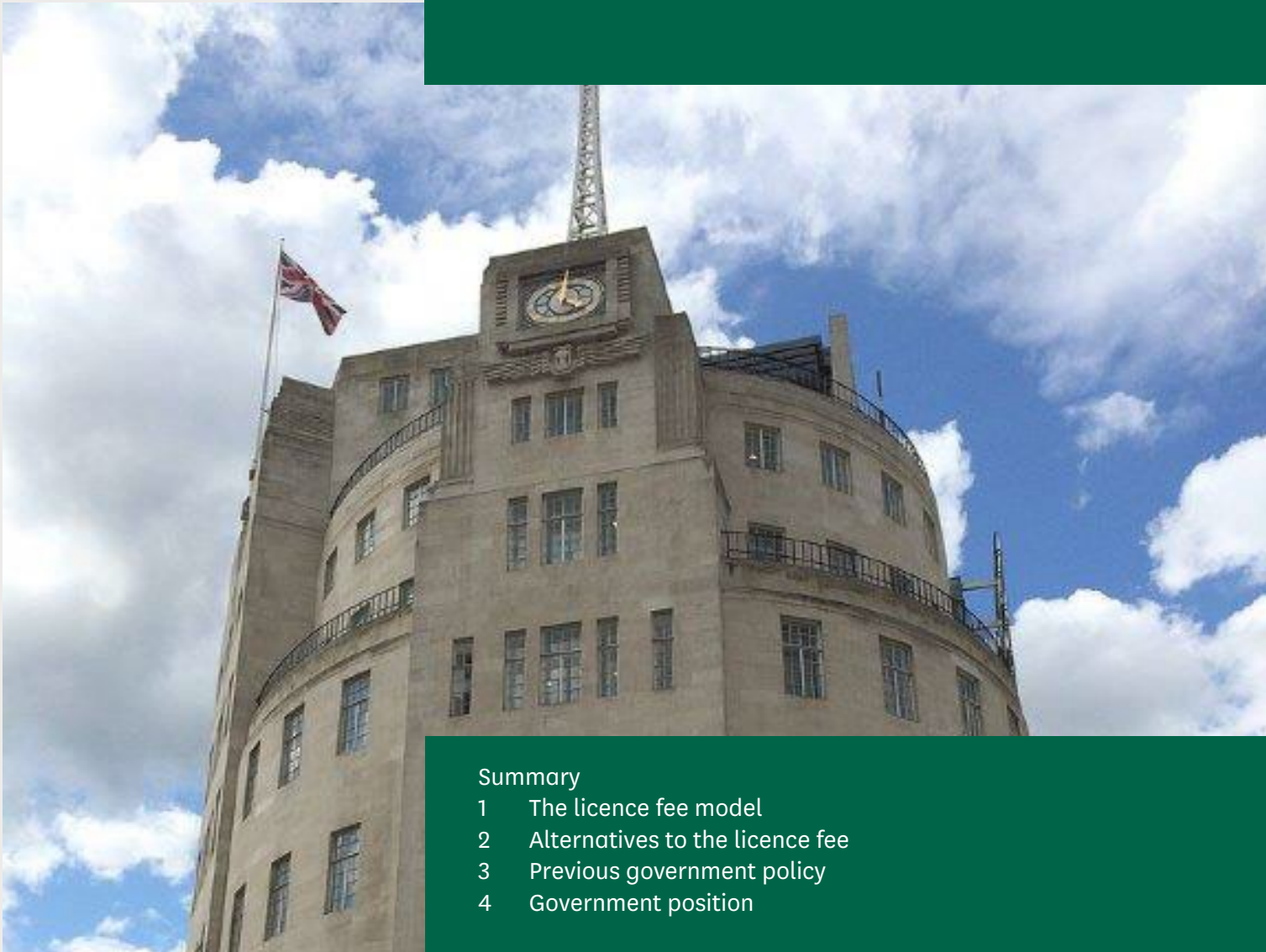


**Research Briefing**

By John Woodhouse

23 December 2024

# The future of the BBC licence fee



## Summary

- 1 The licence fee model
- 2 Alternatives to the licence fee
- 3 Previous government policy
- 4 Government position

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## Summary

Under the BBC's [Royal Charter](#) (PDF) and [Agreement](#) (PDF), the BBC is funded through a licence fee. The current Charter began on 1 January 2017 and runs to 31 December 2027.

The licence fee model was conceived at a time of linear viewing - watching programmes at the time of broadcast. Changes in viewing habits, such as a move to video-on-demand, and the growth of new technologies, has resulted in the model being challenged.

In a written ministerial statement of 29 November 2024, Lisa Nandy, the Secretary of State for Culture, Media and Sport, [said the government was committed to upholding the licence fee until the end of the Charter period](#). This was to ensure the BBC was on a "stable financial footing". As required by the licence fee settlement agreed in 2022, the cost of a TV licence would increase in line with inflation each year until 2027. The cost of an annual colour TV licence from April 2025 would be £174.50, an increase of £5.

Lisa Nandy also announced that the [simple payment plan](#) - a scheme to help those with financial difficulties pay for their licence throughout the year - would be extended. This formed part of a wider discussion with the BBC and Ministry of Justice on how to reduce the impact of TV licensing enforcement action on women and vulnerable people.

The secretary of state said the [previous government's BBC funding model](#) review would not be progressed. The [government would instead consider the future of the funding model as part of the next Charter review process](#).

The [Charter review is due to begin in 2025](#).

# 1

## The licence fee model

The BBC is one of the UK’s public service broadcasters (PSBs). The others are:

- Channel 4 – publicly owned but commercially funded.
- Channel 3 licence holders (ITV in England and Wales, STV in Scotland and UTV in Northern Ireland) - fully commercial.
- Channel 5 – fully commercial.
- S4C (the independent Welsh language service) - part publicly and part commercially funded.<sup>1</sup>

PSBs have additional obligations to other broadcasters, such as requirements to show a certain amount of news and current affairs programmes. They must also provide their services for free across all TV platforms, including pay TV (in turn, TV platforms must make those services available – the ‘must offer, must carry’ principle). The PSBs receive benefits in return, including the right to appear prominently on electronic programme guides (EPGs). This arrangement is sometimes referred to as the “PSB compact”. [Ofcom](#), the communications regulator, is responsible for ensuring compliance with the PSB duties.<sup>2</sup>

### The BBC’s public service remit

The BBC’s public service remit is set out in its [Royal Charter](#) (PDF) (Cm 9365) and [Agreement](#) (PDF) (Cm 9366). The current Charter began on 1 January 2017 and runs to 31 December 2027.

Under Article 4 of the Charter, the BBC’s main object is the fulfilment of its mission and the promotion of the public purposes. Article 5 states the mission of the BBC “is 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”. Article 6 sets out the public purposes:

- to provide impartial news and information to help people understand and engage with the world around them.
- to support learning for people of all ages.

<sup>1</sup> For further detail, see Digital, Culture, Media and Sport Committee, [The future of public service broadcasting](#) (PDF), HC 156 2019-21, March 2021, pp4-5 (accessed 23 December 2024)

<sup>2</sup> For further detail, see the Ofcom website, [Regulating public service broadcasters](#) (accessed 23 December 2024)

- to show the most creative, highest quality and distinctive output and services.
- to reflect, represent and serve the diverse communities of all of the United Kingdom's nations and regions and, in doing so, support the creative economy across the United Kingdom.
- to reflect the United Kingdom, its culture and values to the world.

## The licence fee

Under the Royal Charter and Agreement, the BBC is funded primarily through a licence fee.<sup>3</sup> In January 2022, the government announced that [the cost of a colour licence would remain at £159 for two years, before rising in line with inflation from April 2024](#).<sup>4</sup> A colour licence now costs £169.50 a year.<sup>5</sup> The licence fee model is intended to safeguard the BBC's independence from government and the market.<sup>6</sup>

In 2023/24 total licence fee income was £3.66 billion.<sup>7</sup> It was 3.74 billion the year before.<sup>8</sup> There were 22.924 million licences in force at the end of March 2024. The previous year there were 23.425 in force.<sup>9</sup>

A licence is required, even if a viewer does not watch BBC programmes. Under [Part 4 of the Communications Act 2003](#), a licence is needed to:

- watch or record programmes as they're being shown on TV, on any channel.
- watch or stream programmes live on an online TV service - eg ITV Hub, All 4, YouTube, Amazon Prime Video, Now TV, Sky Go.
- download or watch any BBC programmes on iPlayer.<sup>10</sup>

The above applies to any device used, including a TV, desktop computer, laptop, mobile phone, tablet, games console, digital box or DVD/VHS recorder.

The 2003 act is supported by the Communications (Television Licensing) Regulations (SI 2004/692). These set out the types of television licence, the

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<sup>3</sup> Article 43 of the Royal Charter

<sup>4</sup> [HC Deb 17 January 2022 cc38-40](#)

<sup>5</sup> BBC website, [Licence fee and funding](#) (accessed 23 December 2024)

<sup>6</sup> House of Lords Committee on Communications and Digital, [Public service broadcasting: as vital as ever](#) (PDF), HL Paper 16, November 2019, para 184 (accessed 23 December 2024)

<sup>7</sup> BBC Group, [Annual Report and Accounts 2023/24](#) (PDF), July 2024, p51 (accessed 23 December 2024)

<sup>8</sup> As above, p190

<sup>9</sup> As above, p190

<sup>10</sup> This applies to any provider and any device used, including a TV, desktop computer, laptop, mobile phone, tablet, games console, digital box or DVD/VHS recorder. See: TV Licensing website, [Do I need a TV licence?](#) (accessed 23 December 2024)

criteria for obtaining them, the fees payable, and the concessions available. There is a Library briefing on [TV licences for the over-75s](#) (PDF).

[TV Licensing](#) collects licence fee revenue and enforces the law. The use of a television receiver without a valid licence can lead to prosecution, a court appearance and a fine of up to £1,000. Cases are usually heard in the magistrates' courts. If a fine isn't paid, the court that issued it may impose a custodial sentence. The sentence is for non-payment of the court fine, not for non-payment of the licence fee. The current position is controversial and there have been calls for non-payment to be decriminalised – see the Library Briefing [TV licence fee non-payment: should it be decriminalised?](#) (PDF).

## 2

## Alternatives to the licence fee

The licence fee model was conceived at a time of linear viewing - watching programmes at the time of broadcast. Changes in viewing habits,<sup>11</sup> such as a move to video-on-demand, and the growth of new technologies, has resulted in the model being challenged.<sup>12</sup>

In a February 2015 report on the future of the BBC, the Culture, Media and Sport Committee noted that some people viewed the licence fee as “anachronistic” and disliked paying for a service they used “seldom or not at all”.<sup>13</sup> The committee concluded that the licence fee was becoming “harder and harder to sustain given changes in communications and media technology and services, and changing audience needs and behaviours”.<sup>14</sup>

However, in a November 2019 report, the House of Lords Committee on Communications and Digital claimed the licence fee was the “guarantor of the BBC’s financial independence and underpins its unique quality”. A move to a subscription model, as favoured by some, would undermine the “fundamental principle of universality” that the BBC should be free-to-air.<sup>15</sup>

### Digital, Culture, Media and Sport Committee report (March 2021)

In a March 2021 report on PSB, the then Digital, Culture, Media and Sport Committee noted a “significant minority” of PSB countries in Europe had moved away from a licence fee model attached to a device.<sup>16</sup> This had been driven by factors including:

- the increased number of people accessing radio and TV through computers, smartphones and tablets, which has made a licence fee tied to ownership of a TV set and/or radio anachronistic.

<sup>11</sup> Ofcom’s annual [Media Nations](#) report (July 2024) gives details of consumer behaviours and trends in the media sector. See also the [Media use and attitudes](#) section of Ofcom’s website (both accessed 23 December 2024)

<sup>12</sup> Bowles M, [Auntie Beeb needs a facelift](#), CapX [online], 26 July 2024; Booth P, [Transforming the BBC into a subscriber-owned mutual](#) (PDF), Institute of Economic Affairs, October 2019; Ramsey P and Herzog C, [The end of the television licence fee?](#), European Journal of Communication, 2018; Weeds H, [Is The Television Licence fee fit for Purpose in the Digital Era?](#), Economic Affairs, 36(1), February 2016; Adam Smith Institute, [Global Player or Subsidy Junkie? Decision time for the BBC](#) (PDF), July 2010; [Abolish the BBC television license](#), e-petition, closed June 2019; [Revoke the TV licence using legislation](#), e-petition, closed September 2020 (all accessed 23 December 2024)

<sup>13</sup> Culture, Media and Sport Committee, [Future of the BBC](#) (PDF), HC 315 2014-15, February 2015, paras 191-6 (accessed 23 December 2024)

<sup>14</sup> As above, para 212

<sup>15</sup> House of Lords Committee on Communications and Digital, [Public service broadcasting: as vital as ever](#) (PDF), HL Paper 16, November 2019, para 201

<sup>16</sup> DCMS Committee, [The future of public service broadcasting](#) (PDF), HC 156, March 2021



- the issue of free-riders, where people continue to access public service broadcasting content and services without paying a licence fee.
- difficulties and costs of collection and enforcement.
- a perceived unfairness where flat licence fees are not tied to people's ability to pay.
- questions surrounding the legitimacy of, and public dissatisfaction with, the licence fee.
- governments seeking to reduce the independence of public service broadcasters (PSBs).<sup>17</sup>

The countries that had switched from a licence fee model had moved to a universal fee implemented as either:

- a household/individual fee – Finland, Germany, Sweden; or
- a state grant - Iceland, Netherlands, Romania.

According to the committee, these changes had resulted in less stable funding and the erosion of broadcasters' independence from politicians.

An [annex to the committee's report examined the arguments for and against the licence fee model and alternatives to it](#). The committee concluded that none of the alternatives were "sufficiently attractive to justify recommending" that the licence fee model be replaced for the BBC's next Charter period.<sup>18</sup> Some of the committee's findings are briefly set out below.

## 2.1

### What are the options?

#### Household/individual fee

With a household/individual fee model, PSB funding is not tied to the ownership of a specific device or the use of certain media services. As with other public services, all citizens pay, regardless of their use of PSB.

According to the committee, the model has the following advantages:

- simplicity: could minimise evasion and the cost of collect and/or enforcement if funding can be deducted directly and is payable by all citizens.
- fairer and more progressive than a flat licence fee, depending on the terms of payment.
- not tied to specific devices or types of media; all citizens pay.

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<sup>17</sup> As above, [Annex A](#)

<sup>18</sup> As above, pp51-2

However, it has disadvantages:

- more easily subject to political interference and/or pressure than the licence fee. Would need to be set up with safe-guards to minimise the possibility of political interference.
- can be less transparent than a licence fee.
- payable by all citizens, including those who do not use public service broadcasting so could be unpopular.<sup>19</sup>

## State budget model

With this model, PSB is funded directly through state budgets, either directly from government or indirectly through subsidies. The committee identified these advantages:

- simplicity: could minimise evasion and the cost of collection and/or enforcement if funding can be deducted directly and is payable by all citizens.
- potentially fairer and more progressive than a flat licence fee, depending on the terms of payment.
- not tied to specific devices or media, so all citizens pay.

The model has disadvantages:

- easily subject to political interference and pressure. Less transparent than a licence fee.
- might not be cheap/simple to implement.
- payable by all citizens, including those who do not use public service broadcasting, so could be unpopular.<sup>20</sup>

## Advertising

The committee noted that advertising is not favoured as a primary model for PSB funding because it is oriented to the market/consumer, rather than to the public/citizen. This can result in a de-emphasis on programming that is less economically viable - such as children's content, investigative journalism, arts, and minority language and regional content. In addition:

- funding through advertising is less transparent than forms of public funding such as a licence fee.
- income from broadcast advertising has been declining, making advertising an unstable form of income for PSBs.<sup>21</sup>

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<sup>19</sup> As above, p45

<sup>20</sup> As above, pp45-6

<sup>21</sup> As above, p46

## Subscription

A subscription-based model is generally not regarded as a PSB funding model. The committee said this is because it is “not universal and misses the central role of public service broadcasting as a ‘merit good’ that contributes to the creation of a stable, democratic and peaceful society”:

...Merit goods are goods and services that create positive benefits for social welfare but that people are likely to under consume, and which ought to be subsidised and/or provided free at the point of use so that consumption does not depend on ability to pay.<sup>22</sup>

According to the committee, subscription services are not an adequate funding mechanism for merit goods because they are only available to those who choose (and can afford) to subscribe and only have to provide content for their subscribers. Moreover, subscription would require considerable implementation expenses and the creation of some form of conditional access that, at present, is not possible for FM, AM and DAB radio or Freesat and Freeview TV.<sup>23</sup>

## Taxation as a supplement to public funding

Some countries have used taxes and levies to support the financing of domestic audio-visual production, including:

- levies on cinema admissions (France)
- private broadcasters (Finland, Estonia)
- the purchase of certain media and copying devices, such as blank CDs/DVDs and VCRs/DVDRs (Japan, America, Canada, 25 EU-member countries)
- internet service providers (ISPs) (France).

The committee explained that this form of taxation is a supplement to other public funding and is usually accessible to both commercial and public service providers to support domestic audio-visual and news production. It is often used to tax those who benefit from content production but do not support it financially. It can also reduce the dependence of PSBs on advertising and open up competition.<sup>24</sup>

Some submissions to the committee’s inquiry proposed the introduction of levies to address the rise of global platforms and subscription video on demand (SVoD) services. However, the committee said this model for PSB

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<sup>22</sup> As above, pp46-7

<sup>23</sup> As above, p47

<sup>24</sup> As above, p17

funding would require a new mechanism to collect and distribute the revenue. This could be costly to set up and open to government interference.<sup>25</sup>

## Donations

The committee said that the USA's system is the "clearest example" of funding PSB primarily through individual donations and corporate sponsorship.<sup>26</sup> However, this is not a stable form of revenue and does not protect PSBs from the state or the market. The committee explained why a donation model was not financially realistic in a European context:

...the GDP of the USA in 2010 was around \$15 trillion, approximately double that of the five wealthiest countries in Europe combined (France, Germany, Italy, Spain and the UK). Despite this wealth, public service broadcasting in the USA received less in federal public funding in 2008 than YLE received in Finland with a population of 6m and a GDP of roughly \$246 billion. The USA's funding model for public service broadcasting is arguably not sufficient enough to ensure stable and adequate funding for PSBs and is likely to generate even less per capita revenue in less wealthy economies.<sup>27</sup>

## 2.2

## What are the (dis)advantages of moving from the licence fee?

The committee examined the arguments for and against the UK moving from its licence fee model.

### Advantages

According to the committee, the advantages of moving from the licence fee could include:

- the ability to create a more progressive funding model based on ability to pay, rather than a flat fee.
- requiring all citizens to pay regardless of media use removes free-rider problems.
- a simpler model could address the anachronism of the licence fee being tied to live TV and iPlayer viewing, but not radio and PSB content distributed via the internet (including social media).
- reduced collection and enforcement costs.

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<sup>25</sup> As above, p47

<sup>26</sup> As above, p47

<sup>27</sup> As above, pp47-8

- could address the financial deficit that the BBC might face if decriminalisation of TV licence fee evasion is introduced.<sup>28</sup>

## Disadvantages

The committee noted that a move from the current model could have disadvantages:

- the licence fee is the most stable and predictable form of funding for publicly funded public service broadcasting.
- requiring all citizens to pay regardless of media use could be unpopular and seen as unfair.
- could be hugely disruptive for the BBC (and S4C) and direct energy from programme-making towards defending public service broadcasting as a concept.
- can be costly to implement a new funding model.
- non-licence fee funding models are more open to political interference.<sup>29</sup>

## Government response to the Committee's report (June 2021)

In its June 2021 response, [the government said the current licence fee model was guaranteed by the Royal Charter until December 2027](#).<sup>30</sup> However, because of changes to the broadcasting landscape, the government would reconsider the model ahead of the next Charter review (this has to be completed by 2027).

## 2.3

## Lords committee report on BBC funding (July 2022)

The future of the BBC's funding was examined in a July 2022 report from the Lords Communications and Digital Committee.<sup>31</sup> After considering alternatives to the licence fee model<sup>32</sup>, the committee concluded that some form of public funding for the BBC remained necessary. The licence fee was one option, but its drawbacks were "becoming more salient" – the link to a television set was "increasingly outdated" while its regressive nature meant

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<sup>28</sup> As above, pp41-2

<sup>29</sup> As above, pp41-2

<sup>30</sup> DCMS, [The future of public service broadcasting: Government Response to Committee's Sixth Report of Session 2019–21](#), June 2021, p6

<sup>31</sup> Lords Communications and Digital Committee, [Licence to change: BBC future funding](#) (PDF)[online], HL Paper 44, July 2022 (accessed 23 December 2024)

<sup>32</sup> As above, chapter 4

that raising the fee to the levels the BBC required would “hit the poorest hardest”.<sup>33</sup>

On alternatives, the committee said that a universal household levy linked to council tax bills was one option that could take greater account of people’s ability to pay. A ring-fenced income tax was another. Reforming the existing licence fee to provide discounts for low-income households was a third option.<sup>34</sup>

According to the committee, substituting the licence fee entirely for advertising would provide insufficient income and would decimate the revenues of other PSBs. A full subscription-based model would also deliver inadequate revenues and face major technical hurdles and accessibility barriers.<sup>35</sup> Funding the BBC through government grant would risk undermining editorial independence.<sup>36</sup>

The committee called on the BBC to publish a “bold new vision” as its funding model would ultimately depend on “what the BBC should be for and what it exists to provide”. It also observed that any changes to the BBC’s funding model would require public support. The government should therefore commit to holding national consultations before proposing changes.<sup>37</sup>

## Government response (October 2022)

In its October 2022 response, the government said, among other things, that it had concerns about the fairness of the licence fee funding model. The future of the BBC was a “vital issue”. Details of a review would be set out “in due course”.<sup>38</sup> Following this, the question of the BBC’s future funding model would be finalised in the Charter review.<sup>39</sup>

## BBC response (October 2022)

The BBC’s response to the committee’s report was also published in October 2022.<sup>40</sup> This referred to “five key principles” that underpinned the existence of the BBC as a national and global asset for the future:

- Does it deliver the Mission? - providing a universal public service in the UK, to inform, educate and entertain. Everybody uses and benefits from our trusted impartial news, quality British content, and education services.

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<sup>33</sup> As above, p3

<sup>34</sup> As above, p3

<sup>35</sup> As above, pp3-4

<sup>36</sup> As above, p4

<sup>37</sup> As above, p4

<sup>38</sup> DCMS, [Government response to the House of Lords Communications and Digital Committee’s ‘BBC future funding’ report](#) [online], October 2022, paras 6-7 (accessed 23 December 2024)

<sup>39</sup> As above, para 24

<sup>40</sup> BBC, [Letter from Tim Davie, BBC Director-General, to Baroness Stowell, Chair of the Lords Communications Committee](#) [online], 21 October 2022 (accessed 23 December 2024)

- Does it safeguard impartiality and independence? - championing free democracy in the UK and globally. Operating without fear of or favour to political or commercial interests.
- Does it provide a sustainable financial model? - supporting a BBC to innovate and modernise to meet new audience demands. Enabling the BBC to be ambitious, operate at scale in a global digital marketplace.
- Does it help the creative economy grow? - enabling the BBC to invest and work in partnership to grow the world-leading UK creative industries, develop British talent and export British content and services globally. Creating a strong UK brand valued across the world.
- Does it deliver fair value for audiences? - ensuring a system that is fair for our audiences, offering good value versus the market and is widely supported.

Consideration of these principles was “critical” when deciding the best way to fund the BBC.<sup>41</sup>

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<sup>41</sup> As above, p2

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## 3 Previous government policy

### 3.1 Broadcasting white paper (April 2022)– BBC funding to be reviewed

In April 2022, the government’s broadcasting white paper confirmed that a review of the licence fee model would take place before the next Charter period.<sup>42</sup> This noted that technology had “revolutionised” how people accessed and watched content, with fewer people choosing to watch live TV or other activities that require a licence. If this trend continued as expected, there would be “clear challenges” to the sustainability of the licence fee:

...For example, if fewer households are required to hold a TV licence, and there is a desire to maintain the BBC’s current level of funding, then the price of the licence fee would need to increase, potentially significantly, for those households who continue to be required to hold a TV licence.<sup>43</sup>

As the BBC is a “unique institution”, the white paper said it would be necessary to identify a unique approach that worked best for its continued sustainability.<sup>44</sup>

### 3.2 BBC licence fee review (December 2023)

In December 2023, [the government launched a review into the future of the licence fee and alternative funding options](#).<sup>45</sup> The terms of reference (updated March 2024) explained that it would be considering:

1. The context of a rapidly-changing broadcasting and media market.
2. The sustainability of the BBC’s current funding model.
3. Whether the BBC should provide more services to audiences on a fully commercial basis, and what those services could be.
4. The potential for the BBC to generate more commercial revenue.

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<sup>42</sup> DCMS, [Up Next: The Government’s vision for the broadcasting sector](#) (PDF), 28 April 2022, p17- (accessed 23 December 2024)

<sup>43</sup> As above, p17

<sup>44</sup> As above, p17

<sup>45</sup> [BBC licence fee review launched as action taken to ease rises](#), Department for Culture, Media and Sport press release, 7 December 2023 (accessed 23 December 2024)



5. The evidence around other funding models to support BBC services and output.

6. How the BBC could transition to any new funding mode.<sup>46</sup>

The findings would feed into the review of the BBC's Royal Charter before it ended in December 2027. Any public consultation and final decision on the BBC's funding model would be reserved for the Charter review.<sup>47</sup>

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<sup>46</sup> Department for Culture, Media and Sport, [BBC funding model review: terms of reference – guidance](#), updated 21 March 2024 (accessed 23 December 2024)

<sup>47</sup> [BBC licence fee review launched as action taken to ease rises](#), Department for Culture, Media and Sport press release, 7 December 2023

## 4

## Government position

In a written ministerial statement of 29 November 2024, Lisa Nandy, the Secretary of State for Culture, Media and Sport, [said the government was committed to upholding the licence fee until the end of the Charter period](#).<sup>48</sup>

This was to ensure the BBC was on a “stable financial footing”. As required by the licence fee settlement agreed in 2022, the cost of a TV licence would increase in line with inflation each year until 2027. The government would use the annual CPI inflation rate to calculate the licence fee uplifts. This means the cost of an annual colour TV licence from April 2025 will be £174.50, an increase of £5.<sup>49</sup>

Lisa Nandy also announced that the [simple payment plan](#) – a scheme to help those with financial difficulties pay for their licence throughout the year – would be extended:

...[the plan] is currently available to a limited number of households. We will introduce legislation, when parliamentary time allows, that BBC analysis suggests could double the number of households in financial hardship benefiting from the scheme to around 500,000 by the end of the charter period to support them to be able to access all the BBC offers. This forms part of a wider discussion I am having with the BBC and Ministry of Justice on how we can collectively reduce the impact of TV licensing enforcement action on women and vulnerable people.<sup>50</sup>

The secretary of state said that the previous government’s BBC funding model review would not be progressed. The expert panel set up to support the review would be disbanded. The government would instead consider the future of the funding model as part of the next Charter review process.<sup>51</sup>

During a debate on the Charter on 17 December 2024, Stephanie Peacock, Parliamentary Under Secretary of State at the DCMS, [said that the government intends to launch the Charter review in 2025](#). She explained what this would involve:

...It will be an opportunity to consider what the BBC is for, how it delivers for audiences and how it should be funded, governed and regulated against a rapidly changing media environment. The charter review will also look to uphold the BBC’s independence and ensure that it maintains the public’s trust.

<sup>48</sup> DCMS, [BBC Funding Model: Licence Fee and Simple Payment Plan](#), HCWS 269, 29 November 2024

<sup>49</sup> As above

<sup>50</sup> As above

<sup>51</sup> As above

Charter review is a well-established process, and our next step will be to publish the terms of reference next year, setting out the objectives we wish to achieve. We will ensure that we take all relevant views into account as part of the review. With that in mind, next summer we will also launch a public consultation, as part of which we will encourage everyone to share evidence. We need to have a truly national conversation and ensure that the BBC is reflective of the people it serves, wherever they come from and whatever their background. Once we have consulted widely, considered the views of stakeholders and assessed the evidence, we will outline our policy direction for the next BBC charter in a White Paper in 2026.

There will also be an opportunity to place a draft charter before both Houses before the current charter expires in 2027. The devolved Governments will be a key part of the conversation...<sup>52</sup>

Stephanie Peacock said further details of the review would be given in 2025.<sup>53</sup>

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<sup>52</sup> [HC Deb 17 December 2024 c290](#)

<sup>53</sup> [HC Deb 17 December 2024 c292](#)

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