



Media and  
Communications

# Media@LSE MSc Dissertation Series

Editors: Simidele Dosekun, Zichen Hu



## Reframing the Role of Public Service Media in the Digital Era:

A Framing Analysis of the BBC's Future Role and  
Legitimacy Ahead of the 2027 Charter Renewal

**Paulina Koppenhagen**



Reframing the Role of Public Service  
Media in the Digital Era: A Framing  
Analysis of the BBC's Future Role and  
Legitimacy Ahead of the 2027 Charter  
Renewal

PAULINA KOPPENHAGEN

Published by Media@LSE, London School of Economics and Political Science ("LSE"),  
Houghton Street, London WC2A 2AE. The LSE is a School of the University of London. It is a  
Charity and is incorporated in England as a company limited by guarantee under the  
Companies Act (Reg number 70527).

Copyright, Paulina Koppenhagen © 2025.

The author has asserted their moral rights.

All rights reserved. No part of this publication may be reproduced, stored in a retrieval  
system or transmitted in any form or by any means without the prior permission in writing  
of the publisher nor be issued to the public or circulated in any form of binding or cover  
other than that in which it is published. In the interests of providing a free flow of debate,  
views expressed in this paper are not necessarily those of the compilers or the LSE.

## ABSTRACT

*One of the core challenges for public service media (PSM) institutions in the digital era is to continuously legitimise their role and existence in a rapidly evolving media environment. The BBC's Charter review and renewal process represents an opportunity for the BBC to make a case for itself and for its stakeholders to negotiate and contest the institution's future role. Using a qualitative framing analysis, this study examines how key stakeholders, including the BBC, Ofcom, the UK government, advocacy groups and other media organisations, frame the BBC's future role and legitimacy leading up to the 2027 Charter renewal. A total of 15 publicly available documents were analysed and interpreted through the combined theoretical lenses of Entman's framing theory, Suchman's three pillars of legitimacy and theories of normative media and public value.*

*The findings reveal four emerging frames that position the BBC as a vital part of the UK's media landscape and legitimise its existence in the digital age. These include the BBC's role in combatting disinformation, driving the UK's digital transformation, building trust and implementing public-value driven AI in the wider UK media sector.*

*This study contributes to the broader debate on the future of PSM by examining how its role and legitimacy are shaped through strategic communications.*

**Keywords:** *BBC, Charter renewal, public service media, PSM, future role, legitimacy, digital age*

## INTRODUCTION

'The fight is on for the future of public service broadcasting' (Shah, 2024: para. 20). Not just the British Broadcasting Corporation (BBC) but public service media (PSM) institutions around the world have been under intense pressure due to digitalisation, which has disrupted and fundamentally changed today's media landscape. Younger audiences are turning away, fierce competition from global streaming giants and social media platforms, an information crisis, questions around universality, public value and funding pressures are just some of the many challenges PSM institutions are facing and trying to overcome in the digital era (D'Arma et al., 2024; Konarska, 2024; Martin and Johnson, 2023; Ofcom, 2025a). Additionally, or because

of that, the role, relevance and legitimacy of PSM are increasingly questioned. Consequently, PSM institutions have to continuously adapt their role and responsibilities to renew their legitimacy (Sehl, 2020).

With the current Royal Charter coming to an end in 2027, the BBC is standing at what is often described in public discourse as a critical crossroads that will determine its future (Warrington, 2025). The Royal Charter and Agreement is the constitutional basis for the BBC, which sets out its mission, public purposes, funding model, governance and regulatory arrangements. It is an agreement between the BBC and the Secretary of State for Culture, Media and Sport, reviewed and renewed every 10 years to ensure that the BBC remains relevant, effective and financially sustainable in a changing media landscape (BBC, 2025a). But the Charter review and renewal process also represents an opportunity for the BBC to make a case for itself and for its stakeholders to negotiate and contest the institution's future role. From a strategic communications perspective, the discourse leading up to the Charter renewal at the end of 2027, particularly discursive legitimisation strategies used by its key stakeholders, makes an interesting research topic. Therefore, this study aims to examine how the BBC's key stakeholders, such as the Department for Culture, Media and Sport (DMCS), the official regulator Ofcom, other news media and advocacy groups, frame the future role and legitimacy of the BBC. Whilst some studies have explored the discursive legitimisation strategies used by PSM (D'Arma, 2018) and how PSM is framed by stakeholders (Grönvall & Karppinen, 2025; Kluknavska, 2024) there remains a gap in the literature that explores this in the period leading up to the 2027 Charter renewal. This research study aims to fill this gap. During the previous Charter review period, which started after the General Election in 2015, 'broadcasters, other stakeholders and politicians began positioning themselves in advance of negotiations' (Ward, 2016: 3). With the 2027 Charter review process now underway, we are once again at a point in the process where stakeholders are starting to position themselves and publish statements and reports that aim to influence and inform the overall outcome of the 2027 Charter renewal. This makes this present moment a particularly timely and significant one for conducting this research project.

The BBC was selected as a case study, as it is widely regarded as the blueprint of PSM and remains a leading model that continues to influence other PSM institutions (D'Arma, 2018).

Therefore, the research outcomes may offer insights that are relevant to the broader PSM sector, to understand how its future role and legitimacy are discursively constructed or undermined and how this could potentially be leveraged or countered in future communications strategies.

To meet the research objectives, this study employs a qualitative framing analysis of 15 publicly available stakeholder documents such as speeches, government debates, research reports and press releases. To gain deeper insights into the different frames identified, they are interpreted through a combination of theoretical lenses, including Entman's (1993) framing theory, Suchman's (1995) three pillars of organisational legitimacy and theories of normative media and public value.

The study is structured as follows. The first chapter, the literature review, provides the contextual background and introduces the core theoretical lenses, that underpin the data analysis and interpretation. It explores the academic literature on the legitimacy of PSM and how it is constructed, normative media and public value theory and the key challenges and opportunities for PSM in the digital age. This is followed by an exploration of framing in meaning-making, legitimisation processes and policy development before zooming in on one specific framing technique, securitisation. The next chapter outlines the research questions and presents the theoretical framework. The methodology chapter provides a methodological justification, gives an overview of the sampling decisions, the data selection process and pilot study. It concludes with a summary of the study's key limitations, ethical considerations and reflections on the researcher's positionality. The analysis and discussion chapter presents and interprets the study findings, relates them back and positions them within the existing literature and theoretical discussions. Lastly, the conclusion summarises the key findings and provides recommendations for future research.

## **LITERATURE REVIEW**

The following literature review is structured in two parts. The first part provides the contextual background for this study and explores the academic debate around the legitimacy of PSM in the digital age, the foundations of PSM's role and legitimacy in normative media

and public value theory and discursive legitimisation strategies used by PSM institutions. This is followed by a summary of key challenges for PSM in the digital age but also emerging opportunities, potential new roles and responsibilities that could help to justify its future role. The second part of this literature review introduces the key theoretical concepts and methodological lenses that underpin the study's theoretical framework. These include framing theory, the role of framing in policymaking and the concept of securitisation as a framing technique within this context.

## **The Legitimacy of Public Service Media in the Digital Age**

### **Legitimacy Under Pressure**

'Are public service broadcasting organisations still legitimate?' (Fehlmann, 2023: 31) is one of the core questions when discussing the future of PSM. The digitalisation of the media industry has fundamentally changed the environment in and conditions under which PSM institutions operate. Consequently, they are pressured to adapt, reinvent their role, justify and defend their legitimacy continuously (Moss and Edwards, 2024; Olsen et al., 2024; Picard, 2012; Sehl, 2020). For the purpose of this study 'legitimacy is a generalized perception or assumption that the actions of an entity are desirable, proper, or appropriate within some socially constructed system of norms, values, beliefs, and definitions' (Suchman, 1995: 574).

### **The Foundations of PSM Legitimacy: Normative Media and Public Value Theory**

Normative media and public value theory form the foundation on which the performance and legitimacy of PSM have been and continue to be measured (Fourie, 2017). However, it is time to ask 'to what extent core values that were incorporated within PSM more than a century ago are still valid in a platform age[?]' (D'Arma et al., 2024: 512). Normative media theory describes 'how the media ought or are expected to be organized and to behave in the wider public interest or for the good of society as a whole' (McQuail, 2010: 138). Debates about the media's normative role began in the 1950s, driven by the rapid growth of mass media post-war and reflections on how the media was misused during World War II (Christians et al., 2009). One key theory that underpins the normative role of PSM is the social responsibility theory, according to which the press 'recognizes its [societal] responsibilities and makes them

the basis of operational policies' (Siebert et al., 1956: 74). In the 1990s, this responsibility was further extended to creating public value (Moore, 1995). In relation to PSM, public value goes beyond economic contributions and includes the creation of social, cultural, industrial, representational and civic value (Chivers and Allan, 2022). Whilst commercial broadcasters create monetary value for their shareholders, PSM institutions view their audiences as members of a broader society, not as customers (BBC, 2004). And to serve the needs of these citizens, PSM aims to provide 'what the public most values and also what adds value to the public sphere' (Benington & Moore, 2011: 14).

The BBC's public mission and normative role to inform, educate and entertain was established in its first Royal Charter in 1927 by John Reith and almost 100 years later it remains the guiding principle of the organisation (BBC, 1927). Over time the BBC's mission has evolved and today it 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' (BBC, 2016: 5). The BBC's normative role was significantly extended in 2004, when the concept of creating public value became central to its public mission and purpose. In short, since then the BBC aimed to create public value by strengthening democracy, promoting education, representing diversity, enriching cultural life, facilitating social cohesion and representing UK values and society at a global level (BBC, 2004). To this day, the BBC's performance is measured based on the fulfilment of its mission and core public purposes (Ofcom, 2023). But to what extent is it still appropriate to assess the BBC's performance and legitimacy based on the fulfilment of its mission and public purposes, given that these are rooted in Reithian values and normative PSM theory, which were developed nearly a century ago for a fundamentally different media environment? (D'Arma et al., 2024).

According to Jakubowicz (1998), we are facing a widening gap and growing tensions between the normative role of PSM, expectations from the public and how PSM institutions are actually operating and performing today. This tension is increasingly undermining the legitimacy and relevance of PMS. Similarly, Fourie (2017) and Jacka (2003) critique the applicability and use of traditional normative frameworks to measure the performance and quality of PSM as these norms and values have been developed in a different media environment. Donders (2021) criticises that there is no clear definition of the normative role and values of PSM in the digital

age and this is causing the current legitimacy crisis. But not just scholars are noticing this discrepancy. Chivers and Allan (2022: 19) note that particularly younger audiences

*actively negotiate [...] tensions arising from the evolving, uneven uses of digital media technologies, some of the implications of which complicate the normative ideals of public value currently driving UK PSB policy*

The 2027 Charter review and negotiations present an opportunity to adapt the BBC's role and core values to the digital media environment, evolved audience expectations and needs (Fourie, 2017).

### **The BBC and Beyond: Discursive Legitimisation Strategies of PMS Institutions**

Legitimacy is not static, it changes over time and can be constructed and reshaped through communication (Binz et al., 2015; Vaara et al., 2024). Similarly, Fehlmann (2023: 31) argues that 'the legitimacy of PSM has been primarily understood as the result of strategic communication processes'. To understand how PSM institutions 'make a case for themselves' (D'Arma, 2018: 199), a study conducted by D'Arma (2018) explores the discursive legitimisation strategies used during the last three BBC Charter renewals, more specifically in the BBC Charter Manifestos published in 1992, 2004 and 2015. The findings suggest that the dominant strategy employed by the BBC was to 'leverage [...] discourses around the role of the creative industries as a driver of economic growth' (D'Arma, 2018: 223). By positioning itself as a fundamental driver of a successful creative sector and linking its role directly to economic growth, the BBC portrayed itself as an irreplaceable part of the UK's media sector and cultural landscape and in this way legitimised its continued existence.

In contrast, Olsen et al. (2024: 1818) identified another legitimising discourse that focusses on the risks posed by social media platforms and positions PSM as 'counterweights to negative platform influences'. In this context, social media platforms are framed as breeding grounds for misinformation and power imbalances that favour global over national content. Therefore, PSM institutions portray themselves as the defenders of national content, protectors of cultural interests, national languages and upholders of credible and independent journalism. Similarly, Larsen (2010) suggests that PSM institutions in Scandinavia justify their relevance by

highlighting the provision of high-quality and diverse content, particularly local content, that supports the preservation of local languages and culture, which is often neglected by commercial TV channels and global platforms.

All of these studies focus on the communication strategies used by PSM institutions but they fail to address how other stakeholder groups discursively support or challenge the legitimacy of PSM. However, legitimisation is not only constructed by the organisation itself but also negotiated and influenced by its stakeholders and therefore should be studied too (Heroth, 2025). Furthermore, all existing analyses focus on what has been done in the past but not what could be a potential legitimisation strategy in the future, tailored to the digital media environment. This dissertation aims to fill this gap by providing a more holistic stakeholder analysis. Moreover, as the BBC has just entered the 2027 Charter renewal period, there is a noticeable scarcity of academic literature that explores how the BBC's future role is discursively legitimised or challenged in this context. Therefore, this study offers one of the first in-depth explorations of this emerging topic.

## **Public Service Media in the Digital Age**

The digitalisation of the media landscape is causing fundamental disruption and challenges to PSM systems (Doyle et al., 2025; Rotermund, 2018). But it also provides new opportunities and responsibilities, emerging roles that could renew the legitimacy of PSM (Reviglio, 2019).

## **Challenges and Opportunities in a Changing Market**

One of the key challenges for PSM is the unprecedented competition for audience attention from global streaming platforms such as Netflix, Amazon or Disney+ and social media platforms including Instagram, TikTok and YouTube (Communications and Digital Committee, 2022; Konarska, 2024; Martin, 2020). This 'global marketplace of attention' (Olsen et al., 2024: 1825) is characterised by unlimited choice online, on-demand and algorithmic-driven personalisation that have fundamentally changed audiences' consumption habits to the disadvantage of PSM (D'Arma et al., 2024). According to Ofcom (2025a), broadcasting audiences in general continue to decline and particularly younger audiences turn their back on PSM. Among 16-24-year-olds, only 5% of in-home video time is spent with the BBC in 2024

(Ofcom, 2024). The decline in viewership is a commonly used argument to question the future role and relevance of PSM. Furthermore, to question why people should pay for a service they no longer wish to consume (Olsen, 2024; Barr, 2025).

Another challenge introduced by the platformisation of the media landscape is audience fragmentation and polarisation, which challenge PSM's core value of universality. 'Universality has long been a central tenet of normative theories of PSM' (Martin & Johnson, 2023: 25) and hence a key factor in legitimising PSM but in today's fragmented media environment it is increasingly difficult to achieve (Enli, 2008; Lowe & Savage, 2020; Reiter et al., 2018). As algorithms cater content to viewers' preferences, the exposure to diverse content becomes limited, echo chambers are created and the willingness to engage with people that hold different opinions is declining (Ross Arguedas et al., 2022; Van Den Bulck & Moe, 2017).

In short, it is undermining a healthy public sphere and democracy (Fuchs & Unterberger, 2021). On this basis Moore (2024) argues that PSM has never been more vital to uphold and strengthen our democratic systems. On the contrary, Goodwin (2020) argues that the universal service mission of PSM has always been rather limited and flawed and therefore, should not be one of the primary concerns as there are many other challenges. Universality has truly become a 'battleground' (Martin and Johnson, 2023: 25) for PSM.

However, not only platformisation and echo chambers pose a threat to democracy but also the growing spread of mis- and disinformation (Ecker et al., 2024). Whilst populist and right-wing politicians increasingly accuse PSM institutions of spreading false information and not being impartial (Wolleschensky & Sehl, 2025), a growing number of scholars suggest that PSM will play a crucial role in the fight against mis- and disinformation moving forward (Horowitz et al., 2021; Sehl, 2024; Skippage, 2020). A new role for PSM could be to improve media literacy of the public, so they can identify false information (Sehl, 2024; Reviglio, 2019). PSM 'should not only provide high-quality, diverse and impartial news, but also [...] proactively combat false narratives' (Sehl, 2024: 582 ). To do so, Sehl (2024) suggests that PSM should monitor social media, fact-check and verify information.

## **Calls for Protection through Legislation**

In the past the BBC has been controlled through marketisation. It was widely accepted that its commercial competitors needed to be protected and the BBC's market dominance limited to ensure fair competition (Tambini, 2024; DCMS, 2015). However, in the last two years, academic voices that are urging policymakers to protect and safeguard PSM through legislation have intensified, suggesting 'we need policy to pivot to protect the BBC' (Franks & Seaton, 2024: 2). Tambini (2024: 56) argues that the BBC should become a 'permanent fourth sector institution of the state' given the unprecedented competition from global platforms for audience attention, the weakening of democratic institutions, audience polarisation and fragmentation. Therefore, the BBC should be constitutionalised to ensure it remains 'a public deliberation provider capable of organising democratic debate' (Tambini 2024: 63) and able to deliver public value. Moreover, Franks & Seaton (2024: 4) demand a change in policy to protect the BBC and argue that it will play a crucial role in combatting disinformation and end the current 'information emergency'. These academic interventions are also mentioned by Ofcom, the official regulator of the BBC. In a recent report they warned that 'PSM content is fighting to be seen and heard' (Ofcom, 2025b: 4). Ofcom recommends that new legislation should support PSM content being more prominent and visible on smart TVs, YouTube and other platforms. Like Tambini (2024), Ofcom encourages policymakers to remove outdated restrictions for PSM that were developed for a linear world, which are no longer appropriate and hinder PSM from adapting to the digital world. Based on this, I argue that a shift is underway. PSM is increasingly framed as the victim, a vulnerable institution that requires legislative protection in order to survive and continue to deliver public value.

## **Framing Theory**

At the core of framing theory lies a constructivist assumption that reality is not objective and meaning is socially constructed through communication (Berger and Luckmann, 2023; Kosicki & Pan, 1993). In relation to this study, this means the role and legitimacy of PSM is also discursively constructed, through communication strategies such as framing. Framing is used as a concept across various academic disciplines and therefore, multiple definitions exist (Björnehed and Erikson, 2018). Goffman (1974: 21) introduced the concept to the field of media

and communications, suggesting that frames help individuals to construct meaning and serve as 'schemata for interpretation'. Building on Goffman's framing theory Entman (1993: 52) defines framing as 'to frame is to select some aspects of a perceived reality and make them more salient in a communicating text'. He argues that frames have four main functions: define problems, diagnose the problem's cause, make moral judgements and recommend solutions. They act as tools to guide how a problem is understood but also which solutions are perceived as appropriate in policy development processes, like the BBC Charter review (Dodge & Metze, 2024; Høydal, 2021; Van Hulst & Yanow, 2014).

### **Framing in Policy Making**

Whilst the concept of framing is most commonly associated with media and communication scholarship in particular news media, it has been increasingly considered in policy making from the 1990s onwards (Dodge & Metze, 2024; Rein & Schön, 1996). Since then, framing analysis has become a key analytical research tool in critical policy analysis (Bandelow et al., 2025). Whilst the media play a crucial role in agenda-setting and framing policy issues (Crow & Lawlor, 2016; Grossman, 2022), framing is also used strategically by policy makers themselves to achieve political goals, to stir discourses towards the stakeholders' favourable outcome and own interests (Benford and Snow, 2000; Daviter, 2011). According to Van Hulst et al. (2024: 81) 'when more actors are trying to influence a policy debate through framing, frame contests may be the result, in which frames and counter-frames are constructed, promoted or undermined'. Therefore, conducting a framing analysis in a policy development context will not only reveal the strategies used on a communication level but will also reveal underlying power dynamics and interests of all stakeholders involved (Chivers, 2021; Van Lieshout et al., 2014).

Two recent studies conducted a framing analysis to explore how politicians and policy makers use contesting and polarising frames to undermine PSM's legitimacy. These frames were mostly applied by populist politicians to portray PSM as untrustworthy, misusing public funding and 'not serving the needs of the people' (Kluknavska, 2024: 684). On the contrary, other stakeholder groups framed PSM as being under attack and at risk of losing its independence. Similarly, Grönvall & Karppinen's (2025) study which explores the framing of

Nordic PMS systems in policy discourses, revealed that PSM is increasingly framed as an institution under threat, which is then used to justify the need of ‘constitutional protection of PSM as a democratic institution’ (Grönvall & Karppinen, 2025: 243). National security appears to be an emerging frame used to justify the continued existence of PSM, hence securitisation theory will be further explored in the next section.

### **Securitisation as a Framing Strategy**

An increasing number of scholars (Doyle et al., 2025; FOMC, 2022) argue that ‘PSM should be considered a part of critical national infrastructure (CNI)’ (Barr, 2025: 2). The UK government defines critical national infrastructure as ‘infrastructure, [...] the loss or compromise of which could result in [...] significant impact on national security, national defence, or the functioning of the state’ (NPSA, 2025: para. 1). This shift in thinking and categorisation of PSM as CNI and as a crucial tool to combat mis- and disinformation and defend democracy establishes a direct link between PSM and the protection of national security (Horowitz et al., 2021). It positions PSM not only as a democratic institution but also as a security asset, which represents a potential turning point in how the role of PSM is legitimised in the future. Furthermore, according to Chivers and Allan (2022: 4) ‘a language of crisis permeates many of the policymaking deliberations over PSB’s economic viability and industrial future impact’. Similarly, the preliminary data exploration for this study revealed the prevalence of emergency and crisis-oriented language in the discourse around the BBC’s future role ahead of the 2027 Charter renewal. This indicates a potential strategic framing aligned with securitisation logic. Based on this, I propose that the concept of securitisation developed by the Copenhagen School of Security Studies (Buzan et al., 1997) offers a valuable theoretical lens to further explore whether and how the role of PSM in upholding and defending national security is constructed and how this framing is used to legitimise PSM in the discourse leading up to the 2027 Charter renewal.

For the purpose of this study securitisation is defined as a communicative act (Tagliapietra, 2021: 3)

*that turns a phenomenon into a security issue thanks to a discursive rhetoric focused on threat. A rhetoric that can also legitimise the usage of special measures placed outside the ordinary procedures of political decisions and actions*

The concept is based on the assumption that security and security threats are not objective, but they are socially constructed, often in political arenas and by securitisation actors (Buzan et al., 1997). According to Vultee (2007) securitisation is most impactful when threats are constructed not around individual risk, but on a collective level such as societal stability, national and cultural identity. Stepka (2022: 34) critiques the Copenhagen School's concept of securitisation as one-dimensional and argues instead for an understanding of 'securitisation as the work of framing', as it takes place in policy-making environments, which are discursive arenas characterised by interaction between various stakeholders and collective meaning-making. Therefore, securitisation will be considered as a form of framing in the data analysis process of this study.

Whilst there is a substantial body of academic literature on how media institutions serve as a tool and facilitator in the securitisation process (Tagliapietra, 2021; Vultee, 2007; Dolinec, 2009) there is a gap in the literature that explores how media institutions themselves use this discursive technique to justify and gain public support for their own existence. This research project aims to close this gap by using securitisation as a theoretical lens to interpret the frames used by the BBC and external stakeholders at the early stages of the Charter renewal process.

In summary, the literature review has revealed 3 gaps in the literature that this research project aims to fill. Firstly, as the 2027 BBC Charter review and renewal process is in its early stages, there is a lack of research on it. Therefore, this study offers one of the first in-depth explorations of this emerging topic. The value of conducting this study, at this point in time, is that it allows the BBC to identify frames and narratives that are used to undermine its legitimacy and relevance early in the process, allowing enough time to develop counter-frames and other communication strategies to proactively contest delegitimising arguments or build on supportive frames. Secondly, the existing literature appears to be focussed on the discursive legitimisation strategies of PSM institutions but neglects how other stakeholders are

discursively influencing the conversation around its future. This study provides a more holistic analysis by exploring the discursive strategies used by the BBC and its key stakeholders, comparing and contrasting them. Lastly, using securitisation as a theoretical lens to explore how the role and legitimacy of PSM in the digital age is constructed is a unique approach that has not been explored by other scholars and hence, makes a novel contribution to the literature.

## **RESEARCH OBJECTIVES AND THEORETICAL FRAMEWORK**

### **Research Questions and Objectives**

This research project contributes to the ongoing academic debate on the future role and legitimacy of PSM, with a specific focus on the BBC. It examines how key stakeholders frame the new roles and functions of the BBC in the digital age. The research is guided by the following questions:

**RQ 1:** How do key stakeholders frame the new/emerging roles of the BBC in the lead-up to the 2027 Charter renewal?

**RQ 2:** How is the BBC's legitimacy constructed or challenged within this context?

**RQ 3:** In what ways, if any, is securitisation used as a framing and legitimisation strategy?

### **Theoretical Framework**

While the literature review chapter established the contextual background of PSM legitimacy, explored the key challenges and opportunities for PSM in the digital age and introduced the core theories that will be used in the analysis, this section outlines the theoretical framework. It draws on framing, organisational legitimisation and securitisation theory and explains how these theories combined provide a valuable approach to systematically analyse and interpret the discursive strategies used in the selected texts.

The foundation of this theoretical framework is framing theory, which functions as both the core theoretical lens and the methodological approach. According to Entman (1993) frames have four functions: to define a problem, to identify who or what is causing the problem, to

morally evaluate it and to suggest solutions. By analysing which of these functions a frame fulfils, researchers can better understand what information is emphasised or omitted, how actors are positioned, for example as heroes or villains, the problem or the solution or as morally good or bad (Entman, 1993). It allows for an in-depth analysis of how meaning is constructed. To answer the second research question and gain insight into on which basis the BBC's legitimacy is strengthened or contested, this study applies an organisational institutionalism perspective. More specifically, the aim is to explore how an organisation's sociopolitical legitimisation is built through framing. According to Aldrich and Fiol (1994: 648)

*sociopolitical legitimation refers to the process by which key stakeholders, the general public, key opinion leaders, or government officials accept a venture as appropriate and right, given existing norms and laws*

Suchman (1995) developed this idea further and divided sociopolitical legitimacy into three pillars: pragmatic, moral and cognitive legitimacy (Deephouse & Suchman, 2008). According to Jansma et al. (2019) and Zeën (2021), combining framing analysis with the three pillars of legitimacy allows researchers to reveal the underlying structures and 'dynamics of legitimisation processes' in discourses (Jansma et al., 2019: 195). And therefore, Suchman's (1995) approach is integrated into this theoretical framework. Pragmatic legitimacy is determined by whether an organisation provides direct benefits to a stakeholder group or addresses their broader interests. It is characterised by a transactional relationship between the organisation and its stakeholders, which is grounded in self-interest. In contrast, moral or normative legitimacy are not based on whether an organisation's existence or actions are beneficial for a stakeholder group only. It is evaluated and judged on whether it is 'the right thing to do' (Suchman, 1995: 579) for the wider society based on established social norms and values. Both Entman's and Suchman's theoretical approaches include a moral evaluation component. For the purpose of this study, normative PSM roles and public value theory serve as a baseline to determine what is considered appropriate, right or wrong. As Deephouse & Suchman (2008: 53) note 'congruence with such norms lies at the heart of legitimacy'. Lastly, cognitive legitimacy describes when stakeholders accept an 'organisation as necessary or

inevitable' (Suchman, 1995: 582) driven by taken-for-grantedness instead of self-interest or moral evaluation.

The third theoretical lens of the framework is securitisation theory, which will be specifically applied to answer the third research question. In this context, securitisation processes will be considered as a form of framing as suggested by Štepková (2022). Exploring the BBC's future role through a security lens allows researchers to gain insight into whether security language, crisis rhetoric and the positioning of the BBC as a national security asset succeed in justifying its continued existence and legitimising extraordinary measures to protect and fund it in the future.

## **RESEARCH DESIGN AND METHODOLOGY**

This study employs a qualitative framing analysis to answer the research questions outlined above. The following sections provide a justification for why framing analysis is the most appropriate research method in this context and give an overview of the sampling choices, the data selection process and pilot study. The chapter concludes with a summary of the study's key limitations, ethical considerations and reflections on the researcher's positionality.

### **Framing Analysis: A Methodological Justification**

Framing analysis is one of many discourse analysis approaches to examine the 'structures of text and talk' (Van Dijk, 2023: 151). A qualitative framing analysis has been selected as the most suitable research method, as this study is underpinned by a constructivist assumption that reality and meaning are socially constructed through communication (Berger and Luckmann, 2023; Kosicki & Pan, 1993; Orr, 1978). More specifically, the role of PSM and its legitimacy is constructed through strategic communication (Fehlmann, 2023). In this context, conducting a framing analysis is particularly appropriate as it allows researchers to explore how meaning is constructed and furthermore, which roles different stakeholders play in meaning-making processes (Björnehed & Erikson, 2018; Van Hulst et al., 2024). The outcomes of a framing analysis reveal not only how language and rhetoric are used to build meaning but also which information is presented and omitted, which problems, causes and solutions

are identified and highlighted and by whom (Entman, 1993; Sullivan, 2023). Since the discourse around the BBC's future is polarised (GfK Social Research, 2016), conducting a framing analysis provides a systematic way to compare competing perspectives, understand power dynamics and stakeholder interests (Chivers, 2021; Van Lieshout et al., 2014). It is a method commonly applied in policy-making research to gain insight into how different policymakers use frames to strategically shape how problems and solutions are understood in a way that aligns with their own interests and generates support, to ultimately influence policy outcomes (Høydal, 2021; Schiff, 2024). Additionally, framing analysis is an established method in media research and has frequently been applied to explore how the role of PSM is portrayed by politicians (Kluknavská, 2024; Grönvall & Karppinen, 2025). However, interviews and surveys are not suitable for this research project, as these methods focus on individual experiences, attitudes and opinions, rather than meaning-making (Roulston & Choi, 2018; Wolf et al., 2016).

A framing analysis can be conducted qualitatively or quantitatively (David & Baden, 2017). This study uses a qualitative approach for multiple reasons. Firstly, the research questions ask *how* the BBC's future role is framed, which implies an interest in the underlying structures and mechanisms of role and legitimacy construction. A quantitative approach would have been suitable if the research aim was to measure the frequency of frames or how framing has changed over time, which it is not (Dodge & Metze, 2024). Secondly, the availability of the data requires a qualitative approach, as the number of publicly available documents that are part of the 2027 Charter review and renewal discourse, at this point in time, is limited. However, qualitative explorations typically focus on smaller data sets but still deliver rich and valuable insights (Ahmed, 2025).

### **Sampling and Data Selection**

As this study follows a qualitative research approach, it aims for 'in-depth understanding rather than empirical generalisations' (Patton, 2002: 401). Accordingly, it adopts a purposeful non-probability sampling strategy, which allows the selection of data-rich texts that are highly relevant to the research questions, ultimately leading to better data quality (Bouncken et al., 2025; Campbell et al., 2020).

The first step in the sampling process was to identify the key stakeholders, who participated in previous BBC Charter reviews and negotiations, as these actors are likely to play a central role in the upcoming review. This was achieved by analysing official documents from the 2015/2016 review cycle, leading to the selection of the following stakeholders (Clementi, 2016; Ward, 2016): the BBC, DCMS and Ofcom (the independent external regulator of the BBC). The official websites and online archives of these stakeholders were then accessed to search for the latest statements and documents discussing the future role of the BBC and the 2027 Charter between 25<sup>th</sup> August 2023 to 25<sup>th</sup> August 2025. This timeframe was chosen as it represents the pre-Charter negotiation period in which ‘broadcasters, other stakeholders and politicians beg[i]n positioning themselves in advance of negotiations’ (Ward, 2016: 3). According to Soroka et al. (2015: 204) news media also ‘play a critical role in policy making’ through framing, defining issues and agenda setting. Therefore, UK news articles reporting on the BBC’s future were also included in the sample. The newspaper archive Nexis and websites of news outlets were used to identify relevant articles. Furthermore, the following advocacy groups actively champion PSM in the UK and were all included in the document selection process: the British Broadcasting Challenge, the Media Reform Coalition, the Voice of the Listener & Viewer (VLV), Better Media and the PSM Forum. Statements from other UK TV channels and PSM institutions, direct BBC competitors, were also considered. However, due to the lack of recent official statements on the topic, they were deemed not feasible. More details on sources and search parameters in Appendix B. One limitation of the sample is that the British public as a stakeholder group was excluded from the analysis as the public consultation, which is traditionally part of the Charter review is currently underway and official results and research reports have not been published yet (BBC, 2025b). To mitigate this an analysis of social media or online forum posts to understand how members of the public frame the future role of the BBC could have been included but would have exceeded the scope of this research project. However, future research on this topic should include public opinion.

In total, 15 documents were included in the analysis, including speeches, press releases, research reports and House of Commons debates. Table 1 shows the number of documents by stakeholder group.

<b>Stakeholder</b>	<b>Number</b>
BBC	4
Government organisations/representatives	3
Ofcom	2
Advocacy Groups	2
News media	4
<b>TOTAL</b>	<b>15</b>

**Table 1:** Number of documents per stakeholder type

**Data Analysis Process**

This study uses a hybrid coding approach, which combines inductive and deductive coding to analyse the texts outlined above. The advantage of using a combined approach lies in its ability to enhance the rigor, reliability, replicability and transparency of the analysis (Oliveira, 2022; Roberts et al., 2019). By applying a pre-defined codebook derived from existing literature, the analysis maintains consistency and alignment with prior research, whilst inductive coding allows the researcher to identify new frames emerging directly from the data (Chandra & Shang, 2019). In the first coding phase, a set of priori codes was developed based on the literature review and the BBC’s mission and public purpose statements. These pre-defined codes focussed on established ways the BBC’s role has been defined and justified historically and they were applied to the data in an initial round of deductive coding. The second coding round was inductive and helped to identify emerging frames and discursive strategies, which were not captured by the initial codebook. This step aimed to uncover new strategies used to frame and discursively justify the BBC’s role leading up to the 2027 Charter renewal. These inductive frames and sub-frames were logged and organised in MS Excel, reviewed and thematically grouped into overarching frames and added to the master coding frame. A third and final coding round was conducted to ensure the consistent application of both deductive and inductive codes across the data set. This hybrid approach ensured that the analysis is grounded in theory and existing research. Whilst it also allowed for new, data-

driven insights to emerge, which is particularly relevant when trying to capture the evolving discourses around the BBC's role.

### **Pilot Study: Refining the Coding Frame and Analytical Tools**

To test and refine the pre-defined codebook, to practice how to identify frames inductively and to operationalise Entman's and Suchman's theories, a pilot study was conducted on three texts before analysing the whole data set. The initial coding plan included three levels of coding: inductive coding of how the BBC's role is framed, deductive coding based on Entman's four framing functions and deductive coding based on Suchman's three pillars of legitimacy. However, the pilot study showed that trying to apply and combine all these codes would risk that the analysis becomes too messy, unclear and fragmented, missing overarching patterns (Ahmed et al., 2025). Based on this insight, it was decided to not operationalise Entman's and Suchman's theoretical approaches as codes but use them as lenses for interpretation instead. Furthermore, to give the analysis more structure the initial inductive coding approach to identify how the BBC's role is framed was complemented by a deductive coding round.

### **Study Limitations and Mitigations**

A qualitative framing analysis is not without its limits. One limitation of this method is that it aims for in-depth understanding and therefore, the findings are not generalisable (Lim, 2024). Moreover, there is a greater potential for researcher bias and qualitative framing analysis is commonly criticised for its low reliability and validity (Lim, 2024). Researchers often use inductive approaches, subjectively identify and interpret frames, which makes it challenging to replicate the findings (Linström and Marais, 2012). To mitigate these limitations to the best of my ability I reflected on my own positionality before starting this research project, used a hybrid coding approach and meticulously documented the coding and analysis process to increase the structure and transparency of the research project as suggested by Bourke (2014) and Kuckartz (2014).

The timing of this study is also a limitation. The 2027 Charter review process is still in its early stages and as a result the number of publicly available and relevant documents is currently limited. Consequently, the analysis presented should be understood as indicative of emerging

framing trends rather than definitive conclusions. Nevertheless, conducting this research at this formative stage remains valuable as it may help the BBC to identify potentially negative framings at an early point and inform the development of effective counter-framing and communication strategies. Lastly, due to the focus on documents published by the BBC, the DCMS and Ofcom this study mostly reflects elite perspectives and excludes public opinion. As part of the Charter review the BBC is currently conducting its biggest public consultation to date, asking all BBC account holders, in an online questionnaire, what they expect from the organisation now and in the future (BBC, 2025b). Once the results and research reports of this consultation are available, they must be included in any future research on this topic.

### **Ethics and Self-Reflexivity**

Since this study does not involve direct engagement with human research participants (e.g. through interviews or surveys) nor does it include data from sources such as social media platforms or online forums that could reveal individual identities, personal data or have negative reputational consequences, the expected ethical risks of this study are minimal. The study has been reviewed and approved by supervisor Dr Damian Tambini and has been classified as a low-risk research project that did not require any further ethics approval.

Positionality 'reflects the position that the researcher has chosen to adopt within a given research study' (Savin-Baden & Major, 2013: 71). As Bourke (2014) and Kham (2024) note a researcher's socio-cultural background, beliefs, values, perceptions and political orientation have an impact on all stages of the research process, from research design to the interpretation and reporting of findings. Complete objectivity is unachievable as 'you have to position yourself somewhere in order to say anything at all' (Hall, 1990: 18). Recognising this, it is essential to acknowledge and critically reflect on one's own subjectivity and positionality in order to mitigate potential biases arising in the research process (Bourke, 2014). My academic work to date has focussed on the future of PSM institutions, driven by a strong belief that PSM is a vital part of democratic societies, which has increasingly been under pressure and scrutiny in recent years. I am a committed advocate for PSM in Europe, fan of the BBC and I acknowledge that this positioning may lead to a tendency to view PSM in a favourable light. In order to mitigate this potential bias, I have adopted a critical and reflexive stance throughout

the research process. At the level of data collection this meant the deliberate inclusion of stakeholders and documents that challenge the BBC's legitimacy and critique its role, to ensure a balanced sample. And the inclusion of common arguments against PSM and challenging frames in the codebook.

## **FINDINGS AND DISCUSSION**

As the media landscape continues to evolve, new roles and responsibilities for PSM institutions emerge. These could, if communicated strategically, help to justify the importance of PSM continued existence in the digital age. To contribute to the ongoing academic debate about the BBC's future role, the following report and discussion of findings focus primarily on emerging frames or the reframing of traditional roles used to make a case for the BBC in the discourses leading up to the 2027 Charter renewal. Instead of full citations, the following section uses abbreviations to indicate the source of the data extracts. The full list of abbreviations and corresponding documents is provided in Appendix B.

### **Frame 1: The Role of the BBC in Combating Disinformation**

One of the most dominant frames used across all stakeholder groups positions the BBC as a key player in combating dis- and misinformation. It goes beyond the BBC's role to provide accurate information and trustworthy news and describes it as an organisation that could proactively counteract false information. This frame reflects ongoing academic debates, which similarly argue that PSM will play a crucial role in the fight against dis- and misinformation in the future (Horowitz, 2021; Sehl, 2024; Skippage, 2020). The overarching disinformation frame can be divided into three sub-frames: the BBC as a fact-checker and news overseer, the BBC as an enhancer of media literacy and lastly, the BBC as a holder of soft power.

The first sub-frame highlights the BBC's role as a fact checker and potential overseer of the UK news landscape. The importance of a PSB institution taking on this role in the digital age is stressed by stakeholder statements like 'the role of public service broadcasting [...] has never been more significant than it is today. We are all living in an era of fake news' (03 GOV) or

‘when outrage spreads faster than facts, and filter bubbles shape belief, the BBC’s global stature as a respected public institution matters more than ever’ (01 News).

The BBC has already started to take on this responsibility by running initiatives like BBC Verify, BBC InDepth or Content Credentials (02 GOV). BBC Verify is a specialist team dedicated to fact-checking, verification of videos and pictures and investigation of disinformation using forensic investigation skills and open-source intelligence. The results of their investigations are publicly available. The BBC argues it could take the fact-checking to an international level through utilising AI and partnerships with other PSM institutions

*‘combining agentic AI with trusted BBC journalism to create a new gold standard fact checking tool. Our aim is to work globally with other public service broadcasters to ensure a healthy core of fact-based news’ (01 News)*

Based on Entman’s (1993) framing theory, this frame positions the overwhelming amount of unverified information, pictures and videos we are bombarded with every day as the underlying problem cause. Moreover, it highlights the problem that the average citizen does not have the time or tools to check whether something is fact or fake and is therefore prone to falling victim to false information. In this context, the BBC is framed as the solution as it helps the public, but also other media outlets, to verify information quickly. On a moral level, this frame implies that the BBC acts based on its core value to empower citizens to participate in democratic processes as informed citizens.

Applying Suchman’s pillars of legitimacy to this framing reveals that it supports the construction of pragmatic, moral and cognitive legitimacy. According to Ofcom (02), ‘BBC Verify is the most likely fact-checker website to be used by UK adults’, which demonstrates the transactional value of this initiative for the public and legitimises it pragmatically. Furthermore, it may offer value to smaller news media outlets that lack the financial resources for in-house verification but still want to provide the public with the most accurate information possible. Thereby, it would enhance the broader media ecosystem. From a normative perspective, this frame builds legitimacy as it rests on the normative media value to provide the public with truthful information and not misleading people with false information is generally considered ‘the right thing to do’ (Suchman, 1995: 579). Lastly, the BBC’s long-

standing, taken-for-granted but also internationally respected role as an information provider legitimises this new role cognitively, as the BBC becoming a fact checker feels like a natural extension of its mission to inform and provide accurate news, adapted to the demands of the digital world.

However, this legitimacy is contested. The UK government has voiced concerns about the accuracy of BBC Verify, 'but the frequency with which it has had to correct stories does not suggest that it is meeting these lofty aims' (03 GOV). This reflects a case of frame contestation, since the framing of the BBC as a credible fact-checker and verifier is challenged. This contestation threatens the pragmatic legitimacy by questioning performance but also the moral legitimacy by implying that the BBC fails to uphold journalistic standards. This example shows that legitimacy is not static but continuously negotiated discursively (Vaara et al. 2024; Binz et al., 2015).

The second subframe around media literacy positions the BBC as a distributor of educational content in order to empower citizens in their media and information use. These findings align with those of Sehl (2024) and Reviglio (2019), who also suggest that the BBC could take on a leading role in media literacy. However, the findings of this study further refine the academic discussion by suggesting the BBC could take on a leading role in media literacy, particularly for children. Exemplified by statements like (01 BBC)

*imagine if we could provide every single child in the UK with proper training on disinformation. Helping them to find and assess information they can trust, developing cutting edge media literacy tools and fostering critical thinking*

The central problem promoted by this frame is low media literacy, which means that citizens often do not know how to detect disinformation, critically reflect on the content they see online and where to find trustworthy information. Ofcom (01) argues that 'broadcasters are in a unique place to support audiences to critically engage with news content from a range of sources, distinguish fact from fiction, [...] and raise awareness about conspiracy theories.' Claims like this, frame the BBC as a vital partner and solution in addressing the issue and increasing media literacy among the UK public. This frame also appeals to all three of Suchman's (1995) legitimacy pillars. On the pragmatic and transactional level, the BBC would

provide direct value in the form of education to the public to enhance their media skills. On the moral level, it aligns with the BBC's public purpose to foster informed citizenship and strengthen democracy. According to a media advocacy group, the BBC's involvement in media literacy 'is essential to create a more informed and social media literate UK citizenry' (01 Advocacy). The frame gains cognitive legitimacy as it is based on the BBC's long-standing and taken-for-granted role as an education provider.

The last sub-frame highlights the BBC's role as a soft power asset, particularly through its global provision of information. This framing is presented in statements like 'important soft power asset, with the BBC World Service providing essential, trustworthy news through 42 language services to millions of people across the globe' (03 GOV) or 'it exercises soft power globally in defence of truth, integrity and trustworthiness' (01 Advocacy). It aligns with D'Arma's findings (2018), which similarly identify a growing discourse positioning the BBC as a soft power asset, used as a legitimisation strategy by the BBC itself.

Within this frame, foreign governments are named as the spreaders of targeted disinformation campaigns aimed at eroding public trust and undermining democratic norms in the UK. Described by the British Broadcasting Challenge as 'non-democratic countries which are our economic competitors and our ideological opponents are very active in an information war that seeks to undermine evidence and destabilise trust' (01 Advocacy). This statement illustrates how words like 'war' and 'opponents' contribute to the securitisation of disinformation and frame it as a national threat. On the contrary, the BBC is portrayed as a defensive national asset, which legitimises protective measures for it, such as secure funding. Such measures are justified morally as necessary to maintain the BBC's capacity to counter disinformation and uphold democratic values.

## **Frame 2: The BBC as a Leader in AI**

An emerging frame, which has not yet appeared in academic literature, positions the BBC as a potential leader in public-value-driven AI implementation in the UK media sector. Within this frame the fundamental problem identified is the growing dominance of unaccountable, primarily US-based AI technology companies in the media and information space. These companies are framed as the 'bad guys', which pose a risk to the public interest, data privacy

and national autonomy. For example, one news article warns that the public is ‘handing over every last detail of what’s on their minds to US tech corporations that have proved obstinately unaccountable in the UK’ (02 News). In contrast, the BBC is framed positively, as a trusted accountable public institution and as one of the few UK organisations that are powerful enough ‘to get a hearing from the new generation of tech giants’ and could ‘lead the way in striking deals with generative AI companies’ (02 News). This frame is also present in BBC documents, in which the BBC highlights its ambition to use AI for good and ‘to create significant value for the public in our ownership of proprietary technology in the media sector’ (01 BBC).

This potential new role for the BBC gains legitimacy through the pragmatic and moral pillars of Suchman’s (1995) legitimacy framework. On a moral level, there is an underlying nationalistic moral appeal, which describes the AI leadership of the BBC as a ‘national investment in our future’ (02 News). On a pragmatic level, this frame creates legitimacy by highlighting that the BBC as a leader in AI, would create transactional value not only for the public but also for smaller UK media outlets. This would make the BBC a negotiator on behalf of the whole media sector to land deals with AI companies or even develop a public-facing AI model ‘BBC GPT’ to offer a privacy-respecting, UK-based AI alternative as suggested by Sky News (02 News).

### **Frame 3: The BBC’s Role in Driving the UK’s Digital Transition**

A prominent frame that is primarily promoted by the BBC and reinforced by some media advocacy groups positions the BBC as a key driver and supporter of a fair and inclusive digital transition in the UK, which would have wider social and economic benefits. Exemplified by statements such as

*the BBC can play a vital role in helping to support audiences to transition to digital in a way that’s fair and equitable, where access is guaranteed and no one is left behind* (01 BBC)

or ‘closing the digital divide could unlock billions of pounds in economic and social value for the UK’ (02 BBC). Whilst this framing appears to be one of the core BBC arguments in the lead-up to the 2027 Charter negotiations, it has not been explored in the academic literature.

Based on Entman's four framing functions, this frame positions the BBC as a remedy to a national problem, which is the exclusion of certain socio-economic groups from the digital world. The BBC argues that 'without intervention, these groups risk being further marginalised as services - including the NHS, banking, other governmental services, as well as TV - move online' (02 BBC). The digital divide in the UK is highlighted as the underlying cause of this problem. This includes infrastructural hurdles such as no or bad internet connection in rural areas, the lack of digital skills, especially amongst elderly people and the high costs and difficulty to use new technology. Elderly, unemployed and poorer individuals therefore are at the highest risk of digital exclusion. The moral evaluation that this frame performs is based on the BBC's public values, universality and innovation. As audience habits have changed and people consume content increasingly online, the BBC has an obligation to innovate, meet the licence fee payers on platforms they prefer and produce content that works on these platforms as stated by Ofcom (01) 'public service broadcasters must innovate and make content that engages audiences.' However, universality is also one of the BBC guiding principles, which demands that no one must be left behind in this digital transition and appropriate digital solutions should be created for those who prefer to consume it in traditionally ways. However, the frame strategically excludes information on the BBC's self-interest. As the BBC has switched to a digital-first strategy, it is currently providing its services online (via IP) and satellite. Maintaining both over a long period of time amidst governmental funding pressures puts the BBC under immense financial pressure (Clover, 2025). However, this underlying cause is withheld from the discourse, which illustrates how framing can portray an organisation as the helper that acts in the public interest by omitting information on its self-interest.

Two of Suchman's pillars, pragmatic and moral legitimacy, underpin this frame. From a pragmatic perspective, the UK government, which is responsible for addressing the digital divide, would directly benefit from a BBC that is actively supporting the country's digital transition. The basis for establishing pragmatic legitimacy is, therefore, transactional. The BBC's role would include enhancing the digital skills of citizens through education and developing a 'new streaming media device, designed with accessibility in mind and a radically simple user interface specifically designed to help those currently underserved by digital

services' (02 BBC). By doing so, the BBC would feed into the government's Digital Inclusion Action Plan (DSIT, 2025). The frame also generates moral legitimacy as it focusses on the creation of societal and economic value instead of the BBC's financial benefit.

#### **Frame 4: The BBC as a Catalyst for Building Trust**

Another frame that is heavily utilised by the BBC in recent public communication, as well as by all other stakeholder groups, highlights the BBC's unique potential to rebuild trust. To rebuild trust in information through initiatives that counteract mis- and disinformation, the provision of trusted news and editorial independence. But also restore trust in each other, in society by bringing people together and creating a basis of shared facts and reality.

This frame is based on the assumption that platformisation, algorithmic recommendations and echo chambers are the dividing forces of polarisation, the cause of eroding trust in society and willingness to speak to people with different opinions. Illustrated by this comment from the DCMS

*I think we're all aware of the darker side of social media, where facts are disputed and division is sown. Against that backdrop, your [of PSB] work is not just important, it is central to the future of this nation.*

Based on its longstanding tradition of providing people around the world with impartial and trusted news, bringing people together by 'provid[ing] sporting and cultural programming that brings the country together and promotes a sense of shared values' (01 Ofcom) this frame cognitively legitimises the BBC's role of a trust builder. On a moral level, it touches on the BBC's public value to support a cohesive society and deliberative democracy, of which mutual trust is a part.

Furthermore, this frame draws on securitisation logic, especially in the way it is used by the BBC. Phrases like 'the glue that holds us together. The essential ingredient of a secure, cohesive society' (01 BBC) or trust is needed 'to build a stronger society, strengthen democracy, increase security and stimulate economic growth, which people feel more connected to' (01 BBC) position trust at the centre of national security and social cohesion. Since the same frame also portrays the BBC as the upholder and creator of trust, it is consequently framed as a critical

part of national security. On this basis stakeholders could argue that the 2027 Charter must guarantee the BBC's long-term sustainability and protection, so it can keep protecting the nation.

### **Frame 5: The BBC under Pressure and in Need of Protection**

The analysis also revealed an interesting reframing of the BBC's role in the wider media market. The discourse leading up to the 2027 Charter negotiations is characterised by crisis and emergency language in relation to the BBC's standing in the market and in comparison to its competitors. The frequent use of words and phrases like 'crisis' and 'the fight is on' (03 BBC) 'trying to stay alive' (01 News) signals that the BBC is under pressure and at risk. Historically, the BBC was perceived as the dominant market player, which needed to be restricted and kept small to ensure fair competition. In short, competitors had to be protected from the BBC. But the narrative has shifted and most of the stakeholders voice concerns about the pressures the BBC is under. The BBC is increasingly framed as the victim, that needs protection. This framing aligns with the arguments from various scholars, including Tambini (2024), who calls for constitutionalising the BBC, legislation that protects the BBC's visibility on platforms and smart TVs and changes in regulation that allow the BBC to adapt to the digital environment more quickly and agilely.

This framing identifies multiple causes that put the BBC's future at risk. Firstly, the power of algorithms and platforms in determining what people see, causing PSM's visibility and prominence to decline. Ofcom (01) argues

*The platform determines what content is promoted to users. This makes it harder for audiences to find PSB content, which undermines its universality, and may mean they are exposed to fewer genres or viewpoints.*

Secondly, the BBC's dependency on the government in terms of funding and board appointments undermines its independence and impartiality as 'the hiring and firing of the editor-in-chief of the country's leading newsroom and cultural organisation should not be the job of a politician. It's chilling' (01 News). Thirdly, outdated legislation and regulation that 'stifle[s] innovation' (01 Ofcom) and 'was designed for a linear world' (01 Ofcom) slows down

the BBC's ability to adapt to a digital world. The solution to these problems is framed as the protection of the BBC, which should be the guiding principle of the upcoming Charter review.

Overall, these findings support the argument raised in the literature review that PSM is increasingly framed as the victim of the digital media landscape. A vulnerable institution that requires legislative protection in order to survive and continue to deliver public value in the digital age (Franks & Seaton, 2024, Tambini, 2024). Interestingly, even news media outlets are advocating for the protection of the BBC, even though they are direct competitors and have benefited from a smaller BBC in the past.

### **Security Language without Securitisation?**

To answer the third research question 'In what ways, if any, is securitisation used as a framing and legitimisation strategy?' the codebook included deductive codes representing five central elements of a securitisation process that would involve the BBC. These included: the identification of a societal/national threat; the portrayal of the BBC as the solution or defence; the portrayal of the BBC as the threat itself; calls for extraordinary measures for protection and audience acceptance or rejection of the securitisation attempt. The findings below illustrate how these elements appeared across the data and how they are used by stakeholders.

In terms of language use, the findings align with Chivers and Allan's (2022) observation that the discourse around the future of PSM is characterised by crisis and emergency language. Phrases like 'the fight is on' (03 BBC), 'a looming trust crisis' (01 News), the BBC 'is a vital institution in the battle to defend liberal democracy' (01 Advocacy) and warnings that 'without PSBs there would be significantly less UK content and there is a risk that society becomes ever more fragmented and polarised' (01 Ofcom) construct a sense of societal and national threat. This reflects Vultee's (2007) argument that securitisation is most impactful when threats are constructed not around individual risk, but on a collective level such as societal or national instability. As previously alluded to, the erosion of trust in information, decline of social cohesion, the spread of uncontrolled disinformation, polarisation and fragmentation of the UK society are repeatedly presented as key threats in the data. On the contrary, the BBC is framed as the solution to these problems. A defender of democracy, provider of trusted information and a tool to bring people together and create shared facts and realities. On this basis the

demand for a secure and independent funding model of the BBC are framed as morally and politically necessary actions. Supported by statements like ‘the BBC should be tasked with an enhanced remit to counter misinformation and given the appropriate financial resources to protect our democracy from bad actors’ (01 Advocacy). In this context, the BBC’s future funding could be interpreted as an extraordinary measure within the securitisation framework and a justified response to these existential threats. Furthermore, this aligns with Suchman’s pillar of moral legitimacy as defending the UK society and democracy is widely considered as ‘the right thing to do’ (1995: 579).

Another rhetorical tactic used to frame the BBC as a national security asset is that stakeholders compare it to institutions that are classified as critical national infrastructure (CNI). For example by saying ‘it serves us all as a communal public space, in the same way as the NHS’ (01 Advocacy) or ‘the NHS, banking, other governmental services, as well as TV - move online’ (BBC 02). By comparing the BBC to CNI, it becomes affiliated as such and consequently, any threat to the BBC could also be perceived as an attack on UK society. This is why scholars are increasingly arguing that the BBC should be considered as CNI and be protected accordingly (Barr, 2025; Doyle et al., 2025; FOMC, 2022).

However, the effectiveness of these discursive strategies outlined above, depends on whether the intended audience, in this case the public and policy decision makers, accept these securitisation attempts as a legitimate justification for the BBC’s continued existence in the digital age and the urgent need for secure funding. According to Buzan et al. (1997) securitisation is only considered successful when the intended audience accepts something as a threat and as the justification for extreme measures. This question remains unanswered and therefore, future research should explore whether this acceptance exists amongst the public or in political arenas. Overall, the findings suggest that stakeholder discourses around the BBC’s future partially follow the logic of securitisation but do not meet all the criteria.

### **Challenging Frames**

Contrary to expectations, the number of negative frames and narratives that undermine the BBC’s importance and legitimacy, identified in this analysis, is limited. No frames were found that portrayed the BBC as outdated or unnecessary in the digital age. However, the data

included challenging frames that portrayed the BBC as not fulfilling some of its public purposes. But by doing so, the frames highlighted the need for improvement and reform that allows the BBC to adapt to the digital future independently and agilely. One of the most common criticisms voiced by stakeholders is the BBC's perceived lack of independence from the government, which is seen as undermining its impartiality. A media outlet argued that the 'independence and impartiality [declined] after political pressure was applied through censure, funding freezes and contentious board appointments' (01 News). In relation to this, another frame portrays the BBC as prioritising government over licence fee payers, arguing it should become more accountable to its audiences. The Media Reform Coalition (02 Advocacy) suggests

*it is necessary to make the BBC much more democratic, so accountability is to the public rather than the government [and] reform [it] in a way that puts the public at the centre of public service media*

In short, the negative framings tended to support the sustainable reform of the BBC to make it fit for the digital age rather than advocating for its downfall.

## **The Role of Traditional Normative Media and Public Values in the Digital Age**

The literature revealed that a growing number of scholars questions the appropriateness and applicability of normative media roles and public value theory to measure the performance of PSM in the digital age (D'Arma et al., 2024; Fourie, 2017; Jacka, 2003). However, the findings of this study contradict this trend and show that the industry is holding onto these traditional norms and values, without questioning them. In fact, the analysis revealed that they are still the very foundation on which the legitimacy of the BBC's new and emerging roles is constructed.

## **CONCLUSION**

This research project explored how the BBC's future role and legitimacy is framed by its key stakeholders leading up to the 2027 Charter renewal. As the media landscape is constantly evolving, the analysis focussed on new and emerging arguments that underpin the BBC's

legitimacy in the digital age. The findings revealed four key frames: the BBC's role in combatting disinformation, the BBC as a leader in AI, the BBC's role in driving the UK's digital transition and the BBC as a catalyst for building trust. All of these frames identify an underlying societal problem caused by new technologies and digitalisation and position the BBC as the mitigator of damages or problem solver. The construction of legitimacy through these frames appears to be deeply rooted in traditional and normative PSM values, contradicting academic discussions that increasingly question the appropriateness of these traditional values for justifying PSM in the digital age.

Some of these frames follow securitisation logic and present problems, such as the rise of disinformation, the erosion of trust and the decline of social coherence as national threats. By doing so the BBC is portrayed as a defender of national security, which is a solid basis for justifying urgent or exceptional actions to safeguard the BBC's future funding and sustainability, for example through a funding reform, major governance restructuring or drastic policy shifts. However, the findings are limited and show that stakeholder discourses only partially follow the logic of securitisation but do not meet all the criteria. The findings did not provide an answer to the question of whether the securitisation attempts and identification of a threat have the desired effect on the audience and successfully legitimise extraordinary measures to protect the BBC. Future research could explore whether this acceptance exists amongst the public or in political arenas.

Furthermore, one key stakeholder group, the public, was excluded from this analysis. Therefore, it would be interesting to explore how the BBC's future role and legitimacy is framed by the public using social media data or the results of the public consultation that is part of the Charter renewal process. It would also be interesting to extend this study to other European countries and PSM systems to explore whether PSM institutions are discursively legitimised with the same or different strategies across borders.

As the world's first and most prominent PSM institution, the BBC is widely considered the blueprint of PSM and 'has traditionally exerted a strong influence on how other [...] organizations [...] have articulated their vision and strategy' (D'Arma, 2018: 200). On this basis I argue that the findings of this study might be of value to other PSM institutions and could help them to understand which discursive strategies are being used by various stakeholders

to strengthen or undermine the legitimacy and future existence of PSM. In the latter case, PSM institutions could then develop appropriate counter-frames and employ them strategically to foster support. In the former case, they could use the momentum and include supporting frames in their communications strategy. Thus, this study contributes to a broader understanding of how discourse can be strategically managed to protect or enhance the legitimacy of PSM and to ensure its continued relevance and resilience in a rapidly evolving digital landscape.

## REFERENCES

- Ahmed, S. K. (2025) Sample size for saturation in qualitative research: debates, definitions, and strategies, *Journal of Medicine Surgery and Public Health* 5: 1-6.
- Ahmed, S. K., Mohammed, R. A., Nashwan, A. J., Ibrahim, R. H., Abdalla, A. Q., Ameen, B. M. M. and Khidhir, R. M. (2025) Using thematic analysis in qualitative research, *Journal of Medicine Surgery and Public Health* 6: 1-6.
- Aldrich, H. E. and Fiol, C. M. (1994) Fools rush in? The institutional context of industry creation, *Academy of Management Review* 19(4): 645-670.
- Bandelow, N. C., Hornung, J. and Schröder, I. (2025) Narratives and framing in policy making, *Review of Policy Research* 42(5): 1082-1086.
- Barr, K. (2025) 'Are you being served?' Public service media: audience conceptions of value in UK critical media infrastructure, *International Journal of Cultural Policy*: 1-17.
- BBC (1927) 1927 Charter, URL: [https://downloads.bbc.co.uk/bbctrust/assets/files/pdf/regulatory\\_framework/charter\\_agreement/archive/1927.pdf](https://downloads.bbc.co.uk/bbctrust/assets/files/pdf/regulatory_framework/charter_agreement/archive/1927.pdf) [Last consulted 01.07.2025].
- BBC (2004) Building public value: Renewing the BBC for a digital world, URL: <https://downloads.bbc.co.uk/aboutthebbc/policies/pdf/bpv.pdf> [Last consulted 28.06.2025].
- BBC (2016) Royal Charter for the continuance of the British Broadcasting Corporation, URL: [https://downloads.bbc.co.uk/bbctrust/assets/files/pdf/about/how\\_we\\_govern/2016/charter.pdf](https://downloads.bbc.co.uk/bbctrust/assets/files/pdf/about/how_we_govern/2016/charter.pdf) [Last consulted 30.06.2025].
- BBC (2024) A BBC for the Future, URL: <https://www.bbc.co.uk/aboutthebbc/documents/a-bbc-for-the-future.pdf> [Last consulted 06.07.2025].
- BBC (2025a) Charter and Agreement, URL: <https://www.bbc.com/aboutthebbc/governance/charter> [Last consulted 01.07.2025].
- BBC (2025b) Our BBC, Our Future - Audiences asked to help shape BBC's future, URL: <https://www.bbc.co.uk/mediacentre/2025/our-bbc-our-future-audience-questionnaire> [Last consulted 28.06.2025].
- Benford, R. D. and Snow, D. A. (2000) Framing Processes and Social Movements: An Overview and assessment, *Annual Review of Sociology* 26(1): 611-639.

- Benington, J. and Moore, M. H. (eds) (2011) *Public Value: theory and practice*, London, England: Palgrave Macmillan.
- Berger, P. and Luckmann, T. (2023) The social construction of reality, pp. 132-142 in W. Longhofer and D. Winchester (eds) *Social Theory Re-Wired*, New York, NY: Routledge.
- Binz, C., Harris-Lovett, S., Kiparsky, M., Sedlak, D. L. and Truffer, B. (2015) The thorny road to technology legitimation - Institutional work for potable water reuse in California, *Technological Forecasting and Social Change* 103: 249-263.
- Björnehed, E. and Erikson, J. (2018) Making the most of the frame: developing the analytical potential of frame analysis, *Policy Studies* 39(2): 109-126.
- Bouncken, R. B., Czakon, W. and Schmitt, F. (2025) Purposeful sampling and saturation in qualitative research methodologies: recommendations and review, *Review of Managerial Science*.
- Bourke, B. (2014) Positionality: reflecting on the research process, *The Qualitative Report* 19(33): 1-9.
- Buzan, B., Wæver, O. and Wilde, J. D. (1997) *Security: A new framework for analysis*, Boulder, CO: Lynne Rienner Publishers.
- Campbell, S., Greenwood, M., Prior, S., Shearer, T., Walkem, K., Young, S., Bywaters, D. and Walker, K. (2020) Purposive sampling: complex or simple? Research case examples, *Journal of Research in Nursing* 25(8): 652-661.
- Chandra, Y. and Shang, L. (2019) *Qualitative Research Using R: A Systematic Approach*, Singapore: Springer.
- Chivers, T. (2021) Dynamics of power in the media policymaking process: A critical evaluation of post-Leveson press regulation and the BBC Charter review [PhD Dissertation, Goldsmiths, University of London.], URL: [https://research.gold.ac.uk/id/eprint/30328/1/MED\\_thesis\\_ChiversT\\_2021.pdf](https://research.gold.ac.uk/id/eprint/30328/1/MED_thesis_ChiversT_2021.pdf) [Last consulted 07.07.2025].
- Chivers, T. and Allan, S. (2022) What is the Public Value of Public Service Broadcasting?: Exploring challenges and opportunities in evolving media contexts, URL: <https://pec.ac.uk/wp-content/uploads/2024/01/What-is-the-Public-Value-of-Public-Service-Broadcasting-PEC-Discussion-Paper-Jan-2022.pdf> [Last consulted 14.07.2025].
- Christians, C. G., Glasser, T., McQuail, D., Nordenstreng, K. and White, R. A. (2009) *Normative Theories of the Media : Journalism in Democratic Societies*, Champaign, IL: University of Illinois Press.

- Clementi, D. (2016) A review of the governance and regulation of the BBC, URL: [https://assets.publishing.service.gov.uk/media/5a75ac0eed915d6faf2b4ccf/PDF\\_FINAL\\_20160224\\_AM\\_Clementi\\_Review.pdf](https://assets.publishing.service.gov.uk/media/5a75ac0eed915d6faf2b4ccf/PDF_FINAL_20160224_AM_Clementi_Review.pdf) [Last consulted 29.06.2025].
- Clover, J. (2025) BBC World Service to move from satellite to IP-based delivery. *Broadband TV News*, 2 May, URL: <https://www.broadbandtvnews.com/2025/05/01/bbc-world-service-to-move-from-satellite-to-ip-based-delivery/> [Last consulted 04.08.2025].
- Communications and Digital Committee (2022) Licence to change: BBC future funding, URL: <https://committees.parliament.uk/publications/23091/documents/169130/default/> [Last consulted 21.07.2025].
- Crow, D. A. and Lawlor, A. (2016) Media in the policy process: using framing and narratives to understand policy influences, *Review of Policy Research* 33(5): 472-491.
- D'Arma, A. (2018) How do public service broadcasters make a case for themselves? An analysis of BBC's Charter Manifestos, *Journal of Information Policy* 8: 199-226.
- D'Arma, A., Steemers, J. and Raats, T. (2024) 35 Public service media: Challenges for delivering universal public service in the platform age, pp. 511-526 in U. Rohn, M. Bjørn von Rimscha and T. Raats (eds) *De Gruyter Handbook of Media Economics*, Berlin, Germany: De Gruyter.
- David, C. C. and Baden, C. (2017) Frame analysis, *The International Encyclopedia of Communication Research Methods*: 1-22.
- Daviter, F. (2011) *Policy framing in the European Union*, London, England: Palgrave Macmillan.
- DCMS (2015) BBC Charter Review: Public Consultation, URL: [https://assets.publishing.service.gov.uk/media/5a81aa2f40f0b6230269886e/BBC\\_Charter\\_Review\\_Consultation\\_WEB.pdf](https://assets.publishing.service.gov.uk/media/5a81aa2f40f0b6230269886e/BBC_Charter_Review_Consultation_WEB.pdf) [Last consulted 02.07.2025].
- Deephouse, D. L. and Suchman, M. (2008) Legitimacy in organizational institutionalism, pp. 49-77 in R. Greenwood, C. Oliver, R. Suddaby and K. Sahlin (eds) *The SAGE Handbook of Organizational Institutionalism*, London, England: SAGE Publications.
- Dodge, J. and Metzger, T. (2024) Approaches to policy framing: deepening a conversation across perspectives, *Policy Sciences* 57(2): 221-256.
- Dolinec, V. (2009) The Role Of Mass Media In The Securitization Process Of International Terrorism, *Politické Vedy* 13(3): 8-32.

- Donders, K. (2021) *Public service media in Europe*, London, England: Routledge.
- Doyle, G., Barr, K. and Boyle, R. (2025) Public service media as critical media infrastructure for the digital era, *Media Culture & Society* 47(6): 1132-1149.
- DSIT (2025) Digital Inclusion Action Plan: First Steps, URL: <https://www.gov.uk/government/publications/digital-inclusion-action-plan-first-steps/digital-inclusion-action-plan-first-steps> [Last consulted 19.07.2025].
- Ecker, U., Roozenbeek, J., Van Der Linden, S., Tay, L. Q., Cook, J., Oreskes, N. and Lewandowsky, S. (2024) Misinformation poses a bigger threat to democracy than you might think, *Nature* 630: 29-32.
- Enli, G. S. (2008) Redefining public service broadcasting, *Convergence the International Journal of Research Into New Media Technologies* 14(1): 105-120.
- Entman, R. M. (1993) Framing: toward clarification of a fractured paradigm, *Journal of Communication* 43(4): 51-58.
- Fehlmann, F. (2023) The legitimacy of public service media: A suggestion for a change of perspective, pp. 31-46 in M. Puppis and C. Ali (eds) *Public service media's contribution to society*, Göteborg, Sweden: Nordicom.
- FOMC (2022) *Report of the future of Media Commission*, URL: <https://www.gov.ie/en/the-future-of-media-commission/publications/report-of-the-future-of-media-commission/> [Last consulted 25.06.2025].
- Fourie, P. J. (2017) Normative media theory in the digital media landscape: from media ethics to ethical communication, *Communicatio* 43(2): 109-127.
- Franks, S. and Seaton, J. (2024) Introduction: Where next for public service broadcasting?, *The Political Quarterly* 95(1): 8-11.
- Fuchs, C. and Unterberger, K. (2021) *The Public Service Media and Public Service Internet Manifesto*, London, England: University of Westminster Press.
- GfK Social Research (2016) *Research to explore public views about the BBC*, URL: [https://assets.publishing.service.gov.uk/media/5a806ec440f0b623026937a6/Research\\_to\\_explore\\_public\\_views\\_about\\_the\\_BBC.pdf](https://assets.publishing.service.gov.uk/media/5a806ec440f0b623026937a6/Research_to_explore_public_views_about_the_BBC.pdf) [Last consulted 23.06.2025].

- Goffman, E. (1974) *Frame Analysis: An Essay on the Organization of Experience*, Cambridge, MA: Harvard University Press.
- Goodwin, P. (2020) Universal - but not necessarily useful, pp. 37-47 in P. Savage, M. Medina and G. F. Lowe (eds) *Universalism in public service media*, Göteborg, Sweden: Nordicom.
- Grönvall, J. and Karppinen, K. (2025) Framing Nordic public service media: Comparing policy discourses in Finland, Sweden, Norway, and Denmark, *European Journal of Communication* 40 (3): 233-248.
- Grossman, E. (2022) Media and policy making in the digital age, *Annual Review of Political Science* 25(1): 443-461.
- Hall, S. (1990) Cultural identity and diaspora, pp. 2-27 in J. Rutherford (ed.) *Identity: Community, culture, difference*, London, England: Lawrence & Wishart.
- Heroth, T. (2025) *Corporate Sustainability Disclosure Matters*, Wiesbaden: Springer Gabler.
- Horowitz, M. A. and Lowe, G. F. (2020) Public service media in the era of information disorder: Collaboration as a solution for achieving universalism, pp. 175-190 in P. Savage, M. Medina, and G. F. Lowe (eds) *Universalism in Public Service Media*, Göteborg, Sweden: Nordicom.
- Horowitz, M., Cushion, S., Dragomir, M., Manjón, S. G. and Pantti, M. (2021) A framework for assessing the role of public service media organizations in countering disinformation, *Digital Journalism* 10(5): 843-865.
- Høydal, Ø. S. (2021) Evaluation, framing and power, *Scandinavian Journal of Public Administration*, 25(3/4): 137-153.
- Jacka, E. (2003) "Democracy as Defeat": The Impotence of Arguments for Public Service Broadcasting, *Television and New Media* 4(2): 177-191.
- Jakubowicz, K. (1998) Normative Models of Media and Journalism and Broadcasting Regulation in Central and Eastern Europe, *International Journal of Communications Law and Policy* 2: 2-32.
- Jansma, S. R., Gosselt, J. F., Kuipers, K. and De Jong, M. D. (2019) Technology legitimation in the public discourse: applying the pillars of legitimacy on GM food, *Technology Analysis and Strategic Management* 32(2): 195-207.
- Kham, S. H. (2024) Outsider From Within, Insider From Without: Negotiating Researcher Positionality in Comparative Social Research, *International Journal of Qualitative Methods* 23.

- Kluknavská, A. (2024) Game of frames: a content analysis of politicians' framing of public service media on Facebook and Instagram in the Czech Republic, *Journal of Contemporary European Studies* 30(2): 672-686.
- Konarska, K. (2024) Digitisation means marginalisation of public service media? Changes in the functioning of the BBC, *Zeszyty Prasoznawcze* 67(4): 27-41.
- Kosicki, G. and Pan, Z. (1993) Framing Analysis: An Approach to News Discourse, *Political Communication* 10(1): 55-57.
- Kuckartz, U. (2014) *Qualitative Text Analysis: A Guide to Methods, Practice & Using Software*, London, England: SAGE Publications.
- Larsen, H. (2010) Legitimation strategies of public service broadcasters: the divergent rhetoric in Norway and Sweden, *Media Culture & Society* 32(2): 267-283.
- Lim, W. M. (2024) What is qualitative research? An overview and guidelines, *Australasian Marketing Journal* 33(2): 199-229.
- Linström, M. and Marais, W. (2012) Qualitative news frame analysis: a methodology, *Communitas* 17: 21-38.
- Lowe, G. F. and Savage, P. (2020) Universalism in public service media: Paradoxes, challenges, and development, pp. 11-24 in P. Savage, M. Medina, and G. F. Lowe (eds) *Universalism in public service media*, Göteborg, Sweden: Nordicom.
- Martin, D. and Johnson, C. (2023) Universality: a battleground for UK public service media in the platform age, *The Political Quarterly* 95(1): 25-34.
- Martin, E. N. (2020) Can public service broadcasting survive Silicon Valley? Synthesizing leadership perspectives at the BBC, PBS, NPR, CPB and local U.S. stations, *Technology in Society* 64.
- McQuail, D. (2010) *McQuail's Mass Communication Theory*, London, England: SAGE Publications.
- Moore, M. (2024) Keeping Democracies Alive: The role of public service media, *The Political Quarterly* 95(1): 108-112.
- Moore, M. H. (1995) *Creating Public Value: Strategic Management in Government*, Cambridge, MA: Harvard University Press.
- Moss, G. and Edwards, L. (2024) Public deliberation and the justification of public service media, *International Journal of Cultural Policy* 31(3): 322-337.

- NPSA (2025) Critical National Infrastructure, URL: <https://www.npsa.gov.uk/about-npsa/critical-national-infrastructure> [Last consulted 24.07.2025].
- Ofcom (2023) Performance Measurement Framework, URL: [https://www.ofcom.org.uk/siteassets/resources/documents/consultations/uncategorised/93904-ofcom-and-the-bbc/performance-measurement-framework\\_2023.pdf?v=329912](https://www.ofcom.org.uk/siteassets/resources/documents/consultations/uncategorised/93904-ofcom-and-the-bbc/performance-measurement-framework_2023.pdf?v=329912) [Last consulted 12.07.2025].
- Ofcom (2024) Ofcom Annual Report on the BBC 2023-2024, URL: <https://www.ofcom.org.uk/siteassets/resources/documents/tv-radio-and-on-demand/bbc/bbc-annual-report/2024/ofcoms-annual-report-on-the-bbc-202324.pdf?v=392184> [Last consulted 29.07.2025].
- Ofcom (2025a) Media Nations: UK 2025, URL: <https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/multi-sector/media-nations/2025/media-nations-2025-uk-report.pdf?v=401287> [Last consulted 26.07.2025].
- Ofcom (2025b) Transmission Critical. In *The Future of Public Service Media*, URL: <https://www.ofcom.org.uk/siteassets/resources/documents/public-service-broadcasting/public-service-media-review/transmission-critical-the-future-of-public-service-media.pdf?v=400631> [Last consulted 25.07.2025].
- Oliveira, G. (2022) Developing a codebook for qualitative data analysis: insights from a study on learning transfer between university and the workplace, *International Journal of Research & Method in Education* 46(3): 300-312.
- Olsen, R. K., Tenenboim, O., Hess, K., Westlund, O., Lindén, C., and Broersma, M. (2024) Platform paradoxes and public service media legitimacy: a cross-national study, *Information Communication & Society* 28(10): 1818-1835.
- Orr, C. J. (1978) How shall we say: "Reality is socially constructed through communication?", *Central States Speech Journal* 29(4): 263-274.
- Patton, M. Q. (2002) *Qualitative Research and Evaluation Methods*, CA: SAGE Publications.
- Picard, R. G. (2012) The Changing Nature of Political Case-Making for Public Service Broadcasters, pp. 27-46 in G. F. Lowe and J. Steemers (eds) *Regaining the Initiative for Public Service Media*, Göteborg, Sweden: Nordicom.

- Rein, M. and Schön, D. (1996) Frame-critical policy analysis and frame-reflective policy practice, *Knowledge, Technology & Policy/Knowledge in Society/Knowledge, Technology & Policy* 9(1): 85-104.
- Reiter, G., Gonser, N., Grammel, M. and Gründl, J. (2018) Young Audiences and their Valuation of Public Service Media: A Case Study in Austria, pp. 211-226 in G. F. Lowe, H. Van Den Bulck, and K. Donders (eds), *Public Service Media in the Networked Society*, Göteborg, Sweden: Nordicom.
- Reviglio, U. (2019) Improving User Experience by Browser Extensions: A New Role of Public Service Media?, pp. 257-271 in S. El Yacoubi, F. Bagnoli, G. Pacini (eds) *Internet Science*, Cham: Springer.
- Roberts, K., Dowell, A. and Nie, J. (2019) Attempting rigour and replicability in thematic analysis of qualitative research data; a case study of codebook development, *BMC Medical Research Methodology* 19(1).
- Ross Arguedas, A., Robertson, C. T., Fletcher, R. and Nielsen, R. K. (2022) Echo Chambers, Filter Bubbles, and Polarisation: a Literature Review, URL: <https://doi.org/10.60625/risj-etxj-7k60> [Last consulted 28.06.2025].
- Rotermund, H. (2018) Digital Media Culture and Public Service Media in the Platform Era, pp. 75-89 in G. F. Lowe, H. Van Den Bulck, and K. Donders (eds) *Public Service Media in the Networked Society*, Göteborg, Sweden: Nordicom.
- Roulston, K. and Choi, M. (2018) Qualitative interviews, pp. 233-249 in U. Flick (ed.) *Qualitative Interviews*. London, England: SAGE Publications.
- Savin-Baden, M. and Major, C. H. (2013) *Qualitative Research: The Essential Guide to Theory and Practice*, London, England: Routledge.
- Schiff, D. S. (2024) Framing contestation and public influence on policymakers: evidence from US artificial intelligence policy discourse, *Policy and Society* 43(3): 255-288.
- Sehl, A. (2020) Public Service Media in a Digital Media Environment: Performance from an Audience Perspective, *Media and Communication* 8(3): 359-372.
- Sehl, A. (2024) Public service media as pivotal in combating misinformation and disinformation: prerequisites and approaches, *European Journal of Communication* 39(6): 582-594.

- Shah, S., CBE. (2024) A Very British Success Story: The PSBs at the heart of UK creativity, URL: <https://www.bbc.co.uk/mediacentre/speeches/2024/bbc-chair-leeds-conservatoire-speech> [Last consulted 15.08.2025].
- Siebert, F., Peterson, T. and Schramm, W. (1956) *Four theories of the Press: The Authoritarian, Libertarian, Social Responsibility, and Soviet Communist Concepts of What the Press Should Be and Do*, Champaign, IL: University of Illinois Press.
- Skippage, R. (2020) The role of public service media in the fight against disinformation, URL: [https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2021-02/RISJ\\_Final%20Report\\_RebeccaS\\_2020.pdf](https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2021-02/RISJ_Final%20Report_RebeccaS_2020.pdf) [Last consulted 30.06.2025].
- Soroka, S., Farnsworth, S., Lawlor, A. and Young, L. (2015) Mass media and policy-making, pp. 317-328 in E. Araral, S. Fritzen, M. Howlett, M. Ramesh and X. Wu (eds) *Routledge Handbook of Public Policy*, London, England: Routledge.
- Stepka, M. (2022) *Identifying Security Logics in the EU Policy Discourse*, Switzerland: Springer.
- Suchman, M. C. (1995) Managing Legitimacy: strategic and institutional approaches, *Academy of Management Review* 20(3): 571-610.
- Sullivan, K. (2023) Three levels of framing, *Wiley Interdisciplinary Reviews Cognitive Science* 14(5).
- Tagliapietra, A. (2021) Media and Securitisation: The Influence on Perception, URL: <https://www.iai.it/sites/default/files/iaip2134.pdf> Last consulted 07.08.2025].
- Tambini, D. (2024) Constitutionalising the BBC, *The Political Quarterly* 95(1): 56-63.
- Vaara, E., Aranda, A. M. and Etchanchu, H. (2024) Discursive Legitimation: an integrative theoretical framework and agenda for future research, *Journal of Management* 50(6): 2343-2373.
- Van Den Bulck, H. and Moe, H. (2017) Public service media, universality and personalisation through algorithms: mapping strategies and exploring dilemmas, *Media Culture & Society* 40(6): 875-892.
- Van Dijk, T. A. (2023) Frame analysis, *Discourse Studies* 25(2): 151-152.
- Van Hulst, M., Metze, T., Dewulf, A., De Vries, J., Van Bommel, S. and Van Ostaijen, M. (2024) Discourse, framing and narrative: three ways of doing critical, interpretive policy analysis, *Critical Policy Studies* 19(1): 74-96.

- Van Hulst, M. and Yanow, D. (2014) From policy “Frames” to “Framing”: Theorizing a More Dynamic, Political Approach, *The American Review of Public Administration* 46(1): 92-112.
- Van Lieshout, M., Dewulf, A., Aarts, N. and Termeer, C. (2014) The Power to Frame the Scale? Analysing Scalar Politics over, in and of a Deliberative Governance Process, *Journal of Environmental Policy & Planning* 19(5): 550-573.
- Vultee, F. (2007) Securitization as a media frame: What happens when the media ‘speak security’, pp. 91-107 in Balzacq, T. (ed.) *Securitization Theory*, London, England: Routledge.
- Ward, P. (2016) BBC Charter Renewal, URL: <https://researchbriefings.files.parliament.uk/documents/SN03416/SN03416.pdf> [Last consulted 29.06.2025].
- Warrington, J. (2025) ‘It is unsustainable’: BBC at a crossroads as viewers switch off: Falling licence fee payers is leaving the public broadcaster facing a fight for its future. *The Telegraph*, 7 June, URL: <https://www.telegraph.co.uk/business/2025/06/07/why-bbc-thinks-it-can-get-labour-to-give-it-more-funding/> [Last consulted 06.08.2025].
- Wolf, C., Joye, D., Smith, T. W. and Fu, Y. (eds) (2016) *The SAGE Handbook of Survey Methodology*, London, England: SAGE Publications Ltd.
- Wolleschensky, J. and Sehl, A. (2025) The Populist Threat to Public Service Media (PSM): Experiences, responses and impact of populist attacks on PSM representatives, *Journalism Studies* 26(11): 1283-1303.
- Zeën, B. (2021) Gaining Legitimacy through Framing: A study on how organizations frame sustainability to foster legitimacy [Master Thesis, Radboud University], URL: <https://theses.ubn.ru.nl/items/01d6da4b-55d2-4612-8fd9-e06a66510049> [Last consulted 17.08.2025].

## APPENDICES

### Appendix A: Data Selection

#### Search Parameters:

- Timeframe: 25<sup>th</sup> August 2023 to 25<sup>th</sup> August 2025

- Location: United Kingdom
- Language: English
- Key words: ('BBC' AND ('charter' OR 'future'))

#### Websites and Archives:

- *BBC Media Centre*. (2025). <https://www.bbc.co.uk/mediacentre/>
- *British Broadcasting Challenge*. (2025). <https://britishbroadcastingchallenge.com/>
- *Department for Culture, Media and Sport*. (2025). GOV.UK.  
<https://www.gov.uk/government/organisations/department-for-culture-media-and-sport>
- *Hansar - UK Parliament*. (2025). <https://hansard.parliament.uk/>
- *LexisNexis*. (2025). <https://www.lexisnexis.co.uk/products/nexis.html>
- *Media Reform Coalition*. (2025). <https://www.mediareform.org.uk/>
- *Ofcom*. (2025). <https://www.ofcom.org.uk/>

## Appendix B: List of Analysed Texts

### Advocacy Groups

**01 Advocacy** - British Broadcasting Challenge (2023) Rebuilding the BBC for a Britain and the World: A vision for the future, URL: <https://britishbroadcastingchallenge.com/wp-content/uploads/2023/10/Rebuilding-the-BBC-October-2023.pdf> [Last consulted 29.07.2025].

**02 Advocacy** - Media Reform Coalition (2024) Media Reform Coalition Submission to DCMS BBC Funding Model Review, URL: <https://www.mediareform.org.uk/wp-content/uploads/2024/04/Media-Reform-Coalition-Submission-to-DCMS-BBC-funding-model-review-March-2024.pdf> [Last consulted 29.07.2025].

## BBC

**01 BBC** - Davie, T. (2025) The BBC - A Catalyst for Building Trust, URL:

<https://www.bbc.co.uk/mediacentre/speeches/2025/tim-davie-director-general-bbc-catalyst-for-trust>

[Last consulted 01.08.2025].

**02 BBC** - BBC (2025a) The Socioeconomic Impact of Digital Transition [Press release], URL:

<https://www.bbc.com/mediacentre/articles/2025/the-socioeconomic-impact-of-digital-transition> [Last

consulted 09.08.2025].

**03 BBC** - Shah, S., CBE (2024) A Very British Success Story: The PSBs at the heart of UK creativity,

URL: <https://www.bbc.co.uk/mediacentre/speeches/2024/bbc-chair-leeds-conservatoire-speech> [Last

consulted 03.08.2025].

**04 BBC** - Shah, S. (2025) BBC Group Annual Report and Accounts 2024/25 - A Success Story For The

Future Statement, URL: [https://www.bbc.co.uk/aboutthebbc/documents/ara-24-25-statement-from-](https://www.bbc.co.uk/aboutthebbc/documents/ara-24-25-statement-from-chairman.pdf)

[chairman.pdf](https://www.bbc.co.uk/aboutthebbc/documents/ara-24-25-statement-from-chairman.pdf) [Last consulted 30.07.2025].

## News Media

**01 News** - The Guardian (2025) The Guardian view on the BBC's future: the broadcaster's

independence and funding face challenges. *The Guardian*, 6 July, URL:

[https://www.theguardian.com/commentisfree/2025/jul/06/the-guardian-view-on-the-bbcs-future-the-](https://www.theguardian.com/commentisfree/2025/jul/06/the-guardian-view-on-the-bbcs-future-the-broadcasters-independence-and-funding-face-challenges)

[broadcasters-independence-and-funding-face-challenges](https://www.theguardian.com/commentisfree/2025/jul/06/the-guardian-view-on-the-bbcs-future-the-broadcasters-independence-and-funding-face-challenges) [Last consulted 30.07.2025].

**02 News** - Spencer, K. (2025) Observer editor-in-chief James Harding says BBC should be 'put beyond

reach of politicians'. *Sky News*, 20 August, URL: [https://news.sky.com/story/observer-editor-in-chief-](https://news.sky.com/story/observer-editor-in-chief-james-harding-says-bbc-should-be-put-beyond-reach-of-politicians-13415300)

[james-harding-says-bbc-should-be-put-beyond-reach-of-politicians-13415300](https://news.sky.com/story/observer-editor-in-chief-james-harding-says-bbc-should-be-put-beyond-reach-of-politicians-13415300) [Last consulted

25.08.2025].

**03 News** - Leader, O. (2025) The Observer view: protect the BBC. *The Observer*, 25 August, URL:

<https://observer.co.uk/news/opinion-and-ideas/article/the-observer-view-protect-the-bbc> [Last

consulted 27.08.2025].

**04 News** - Wilson, A. (2024) Strictly speaking, the BBC needs a shake-up. *The Times*, 29 July, URL: <https://www.thetimes.com/comment/columnists/article/strictly-speaking-bbc-shake-up-dancing-wrrkbhs89> [Last consulted 27.07.2025].

## Ofcom

**01 Ofcom** - Ofcom (2025) Transmission Critical: The future of Public Service Media, URL: <https://www.ofcom.org.uk/siteassets/resources/documents/public-service-broadcasting/public-service-media-review/transmission-critical-the-future-of-public-service-media.pdf?v=400631> [Last consulted 06.08.2025].

**02 Ofcom** - Ofcom (2024) Ofcom Annual Report on the BBC 2023-2024, URL: <https://www.ofcom.org.uk/siteassets/resources/documents/tv-radio-and-on-demand/bbc/bbc-annual-report/2024/ofcoms-annual-report-on-the-bbc-202324.pdf?v=392184> [Last consulted 25.07.2025].

## UK Government

**01 GOV** - DCMS (2024) New plans to ensure the BBC's financial sustainability set out by the Culture Secretary [Press release], URL: <https://www.gov.uk/government/news/new-plans-to-ensure-the-bbcs-financial-sustainability-set-out-by-the-culture-secretary> [Last consulted 24.07.2025].

**02 GOV** - DCMS (2025) *Lisa Nandy speech at Media & Telecoms 2025 and Beyond Conference* [Speech], URL: <https://www.gov.uk/government/speeches/lisa-nandy-speech-at-media-telecoms-2025-and-beyond-conference> [Last consulted 24.07.2025].

**03 GOV** - House of Commons (2024) BBC Charter Review, URL: <https://hansard.parliament.uk/Commons/2024-12-17/debates/27257240-11DA-4A87-99ED-9F268A4C9FB9/BBCCharterReview> [Last consulted 25.07.2025].