

Funding journalism *using participatory* *grantmaking*

A guide

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The Media Reform Coalition was founded in 2011 and brings together activists, academics and media producers to challenge unaccountable media corporations and build an independent, democratic media system. MRC believes that democratically controlled funding will be a crucial part of media practices of the future.

The Public Interest News Foundation (PINF) is the first charity in the UK with a remit to support public interest journalism. PINF believes that everyone in the UK should benefit from high-quality news that speaks to them, for them and with them. PINF is keen to explore the potential for a participatory model of grantmaking, to ensure that news providers are meeting the real needs of their communities.

The Institute of Welsh Affairs is a think tank and charity, independent of government and political parties. By bringing together experts from all backgrounds, the IWA conceives ambitious and informed ideas which secure political commitments to improve Wales' democracy and economy. The IWA wants to see Wales' civic sphere grow and strengthen, and has a track record of encouraging a more sustainable media landscape for Wales, with current work focused on the importance of citizens' voices in shaping a more effective and inclusive journalism industry.

Introduction

In the UK and around the world we face multiple, intersecting crises – crises in our democratic institutions, crises of social inequality, and crises in our environment. We urgently need a media system that can facilitate democratic participation and collaboration and support collective solutions to major challenges such as pandemics and the climate catastrophe. One key part of this media system is trustworthy, relevant and reliable news and information, which has a vital role to play in democratic life.

This period of wider instability has also coincided with a period of major change in how journalism is practised and funded, particularly structural changes in advertising markets that have made it an ever less sustainable funding model for journalism. It is widely accepted that new sources of funding are now required to support journalism, whether coming from the state, philanthropy or big tech companies.¹

Less explored is the question of how this money should be distributed. **We believe that for media to truly support democratic life, the ways it is funded should also be subject to democratic control and accountability.**

This guide outlines how learning and best practice from participatory grantmaking, which is widely used within philanthropy, could be adapted for journalism funding to meet this aim.

The guide is in three parts:

1. Rationale

Part 1 outlines the rationale for this approach, covering the crises within journalism, an overview of participatory grantmaking, how this could be applied to journalism funding, and some core principles and recommendations.

2. Tool

Part 2 provides a framework for existing or new funds to think through different aspects of how they could adopt participatory processes, including in their structure, priorities and strategy, types of grants, decision-making and operations.

3. Proposal

Part 3 is a proposal for establishing a £100 million a year fund for journalism (based on proposals by several policy reports²) with participatory grantmaking at its heart.

Brief case studies throughout the guide show how these ideas have already been put into practice, and links to further reading at the end of this report signpost where to learn more about these ideas.

This guide is written with several audiences in mind, who are likely to find particular sections most relevant to them.

These audiences include:

- ▶ **Philanthropic funders** who currently support journalism or are interested in doing so. These may be most interested in sections 1.2–1.4 about participatory grantmaking and journalism, and the Tool in section 2.
- ▶ **Government bodies** interested in new funding mechanisms for journalism. These may want to focus on the Rationale in section 1, the Proposal in section 3, and Appendix 3.
- ▶ **Independent news providers and civil society groups** wanting to advocate for new funding streams which embed democratic practices and values. These may want to focus on the Rationale in section 1, and the Proposal in section 3.

This guide is the product of collaboration between the Media Reform Coalition and the Public Interest News Foundation (PINF), with input from a wide range of organisations with relevant expertise.

The lead author is Dr Debs Grayson. More information about the authors and others who contributed to this guide are in Appendix 1.

1. Rationale

1.1 The crises in journalism

Over the past two decades, the funding model which previously supported commercial journalism has collapsed, as advertising revenue has increasingly been channelled towards the big tech monopolies. As recognised in the 2019 Cairncross Review,³ this has been particularly catastrophic for local and investigative news – two types of journalism that are vital for a functioning democracy. Alongside this collapse in income, consolidations and cost-cutting by the largest media corporations have resulted in huge concentrations of ownership and growing local news deserts.⁴ All these trends have significantly reduced the plurality of voices that can be heard within the public sphere, with digital platforms exacerbating these tendencies towards concentrated monopolies.⁵

Alongside this crisis in funding, there is also a crisis in the product of journalism itself. As evidenced in Impress' News Literacy Report, there is both a strong consensus on the standards and practices the public want to see from their news media, and strong agreement that this is not what they are receiving.⁶ The impacts of AI are still unclear but may lower the quality of news and information still further.⁷

There is also widespread evidence that news and journalism as it is currently practised can cause significant

harm, particularly to marginalised groups, and that increasing proportions of the population feel excluded from, and unrepresented by, the media we have.⁸ These shortfalls in voice and pluralism have serious democratic consequences, as they contribute to precipitous declines in trust in both news organisations and democratic institutions,⁹ and contribute to growing democratic deficits and disconnects between decision-makers and the communities they are meant to serve.¹⁰

We face, therefore, a need to reimagine and reshape both how journalism is funded and how it is practised. The Forum on Information and Democracy has warned that independent journalism around the world faces a potential 'extinction event' unless there is a significant investment from governments and other institutions,¹¹ which is likely to include ongoing subsidy for core costs as well as funding for 'innovation'.¹²

At the same time, this funding needs to be distributed in ways that support better kinds of journalism – the kind that can fulfil PINF's vision of all communities having access to 'high-quality news that speaks to them, for them and with them'. These 'co-creational' models of journalism can rebuild trust, foster community empowerment, address injustices and exclusions, and be part of a renewed democratic culture – rather than contributing to polarisation, alienation and disengagement (see Appendix 3). Emphasising participation as a key criterion for journalism funding would also bring it in line with best practice within arts funding, where community engagement and participatory elements are now standard.¹³

We believe that the best way to channel new forms of funding towards these kinds of journalism is by learning from democratic funding models which have been developed within philanthropy. Borrowing from these models would have additional benefits in terms of safeguarding independence. There are understandable concerns about direct funding of news providers by government and state institutions – though it should be noted that significant public subsidies already exist (see box below), with minimal safeguards for ensuring they are used in the public interest.

Any new public funding streams must institute better mechanisms for accountability and democratic oversight while ensuring independence from government and other powerful interests, including markets or philanthropic donors.¹⁴ We believe that a well-designed participatory grantmaking process is the best means of achieving these aims.



Case studies *Co-creational models for the news media*

A recent report for the Public Interest News Foundation defined a co-creational model for news organisations. These are models which combine 'the traditional commitment to epistemic (knowledge-related) norms such as accuracy with

a greater commitment to public participation and social inclusivity'.¹⁵ The authors argue that co-creational models may have particular benefits for building a thriving democratic culture and fostering trust in news providers.

One example of this model in the report is The Ferret, an online investigative journalism platform in Scotland, which is run as a multi-stakeholder cooperative. In late 2022, The Ferret worked with the community magazine Greater Govanhill to establish a Community Newsroom in Glasgow. The space is being used to work, host events and hold drop-in sessions for community members who want to share their stories. This kind of innovative project, bringing together community-based journalism and rigorous investigative journalism, exemplifies the co-creational ethos.

Other examples of news organisations adopting co-creational models explored in the report are the Bristol Cable, Black Ballad, Bellingcat and gal-dem (which closed shortly after the report's publication). Similar models are practised by many members of bodies such as the Independent Media Association (IMA) and the Independent Community News Network (ICNN), as well as by some Community Radio stations.

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Current public subsidies for news organisations ¹⁶

News organisations receive a range of public subsidies, including:

- ▶ £500 million a year for the VAT exemption
- ▶ £8 million a year for the BBC Local Democracy Reporting Service
- ▶ £46 million a year for public notices (local government advertising)
- ▶ Up to £200 million spent on the All In, All Together campaign during the pandemic

Almost all of this public subsidy has gone to the largest commercial monopolies, which have been cutting journalist jobs while paying exorbitant executive salaries, and in some cases are continuing to pay millions of pounds in compensation to victims of phone hacking.

independence. There are understandable concerns about direct funding of news providers by government and state institutions – though it should be noted that significant public subsidies already exist (see box below), with minimal safeguards for ensuring they are used in the public interest.

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1.2 Participatory grantmaking

Participatory grantmaking (PGM) is a set of practices within philanthropy that recognises the limitations of donor-centred or professionalised grantmaking. Critics of traditional philanthropy have highlighted that when donors or professional staff are the ones shaping programmes and making grant decisions, they often end up excluding the most vital and necessary groups and projects, while channelling resources to work which is misaligned with community needs.¹⁷ In response to this, PGM is 'both a power-shifting ethos and the process that places the communities a foundation aims to serve at the centre'.¹⁸ It aims to distribute power as well as money, involving affected communities not just in final decision-making but in designing the overall structure and purpose of the fund.

PGM has many similarities with Participatory Budgeting (PB), which refers to open processes where communities decide about priorities for public funding. PB has been widely used across the world as a way of deepening democratic participation in shaping policy, including in the UK, although never on a particularly large scale.¹⁹ Given that at least some of the proposed new journalism funds will consist of public money, PB may seem more appropriate than PGM. However, because PGM tends to have more of an emphasis on ongoing relationships and building a community of practice around the fund, we believe it is a more suitable framework for funding journalism than PB.²⁰

When done well, PGM processes can:

- ▶ **Make better decisions** because they are informed by information closer to the ground;
- ▶ **Foster connections**, solidarity and leadership among grantees and communities, rather than just a zero-sum competition for grants;
- ▶ **Create an iterative and transparent process** where the institution can be held accountable;
- ▶ **Be accessible** to groups who struggle to access other kinds of funding, through outreach and resourcing participation.

Two common concerns about adopting PGM are that it is more costly than traditional grantmaking, and

that it creates conflicts of interest given that there is much less distance between decision-makers and recipients of money. In terms of resources, while it is hard to compare given that there is little research on how long or costly traditional grantmaking is,²¹ any successful PGM process will need to provide some additional resources e.g., to appropriately compensate participants. In terms of conflicts-of-interest, it has been argued that deeper connections between decision-makers and grantees are a positive resource and should be reframed as 'relationships of value and interest'²² – and there are a range of methods for ensuring these relationships do not have undue sway over final grant decisions.²³

Although PGM is not necessarily well known outside of philanthropy, it is now a well-established set of practices embedded in a large number of funds across the world, including Mama Cash, the Red Umbrella Fund, Fund Action and Global Greengrants.²⁴ In 2021, a global community of practice was established to share learning and best practice across a range of national contexts.²⁵

Much of the existing literature and resources are aimed at existing funds who want to transition towards PGM. This literature often states that it is easier to embed PGM with new funds. Since so few funds currently exist for journalism in the UK context, there is a real opportunity to ensure participation is embedded from the outset.



Case studies *PGM in the UK*

An established fund: Edge Fund ²⁶

Edge Fund is a UK-based funder which distributes small grants to grassroots groups. Grant decisions are made by members, the majority of whom are organisational members from groups which have previously been grantees. Between 20-40 members meet to score applications for each round. After eligibility checks, applications are divided up and scored individually and anonymously. Community committees made up of people with specific expertise and experience (e.g., migrant rights or Gypsy, Roma Traveller organisations) score applications which have been categorised as fitting their knowledge and experience.

In a series of meetings, a long list of 50-60 groups is generated, and then a final list of 40 groups is agreed through voting, taking into account the overall mix of types of groups, their access to other resources, geographical spread etc. Grantees all receive £1,000 without reporting requirements and are invited to Radical Sharing Forums to share learning with other grantees, and to send a representative to score applications in future rounds.

A new fund: Joseph Rowntree Charitable Trust (JRCT) Movements Fund ²⁷

The JRCT Movements Fund was launched in 2022. JRCT has historically focused on campaigning and policy work, but in recent years has recognised the need to give greater support to grassroots movements. The process of establishing the fund involved a number of phases: an initial learning phase, out of which Trustees decided to set up a pilot fund (2018-19); a consultation which brought movement actors into designing the fund, including setting priorities, principles and criteria (2020); hiring staff to create the fund, refine the decision-making process, and recruit a 9-person Movement Assembly with a range of lived and learned expertise and relationships across a variety of movements (2022). The first round of funding was distributed in 2023.

A key learning when establishing the fund was that JRCT's usual approach of funding work on a thematic basis (e.g., through their Peace and Security or Sustainable Futures programmes) would not be appropriate for grassroots movements, where there is a strong emphasis on linking together multiple issues. Rather than focusing on what an organisation works on, the fund's criteria instead focus on how an organisation operates – for example, being led by those directly affected by issues, and having a transformative vision and intersectional analysis of the problems they seek to address.

1.3 Using participatory grantmaking to fund journalism

We believe there are several opportunities and potential benefits to incorporating PGM into journalism funding such as:

- ▶ Embedding **democratic values and co-creation** at all stages of news provision – from how newsrooms operate to what gets funded;
- ▶ Creating new **lines of accountability** between news providers, the communities they serve and the wider public by holding them to agreed values and principles;
- ▶ **Building trust** in funders and grantees through transparent decision-making;
- ▶ Creating **collective strength** in the sector, sharing best practice and encouraging experimentation with new models of participatory journalism.

There will also be some challenges when adapting PGM to journalism funding. PGM is generally framed as supporting community empowerment or building movements for social change, rather than building a commercial sector or industry. While some level of profit-making may be considered acceptable, the recipient's core purpose would need to be delivering

public goods and value for communities, rather than returning profits to shareholders.²⁸ In addition, in a context where large media conglomerates dominate the landscape there will need to be safeguards to ensure that funds go towards smaller and less well-resourced outlets, which could be achieved through having turnover thresholds as eligibility criteria.²⁹

Another question is how to define an 'affected community' when it comes to journalism. Generalised accounts for the need for public interest journalism are likely to be too broad to provide a helpful steer for a PGM for journalism fund; in some senses, almost everyone is 'affected', since relatively few people live in places which have adequately funded and resourced local public interest journalism. In order to target resources in the most useful places, there will need to be an analysis of who is harmed by, and excluded from, the media that currently exists, and active steps taken to ensure people from those communities are involved in decision-making.

In addition, creating an explicit framework that names both eligibility criteria and funding priorities will inevitably exclude or deprioritise some organisations. While some of these exclusions may be relatively straightforward – e.g., there is likely to be broad agreement that this funding should not go to the largest commercial news providers – others may be controversial, such as determining what constitutes adequate regulation for those who are not members of a Press Recognition Panel-recognised regulator.

While this may cause a level of conflict within the independent news sector, this should not be shielded away from, but taken as an opportunity for reflection and learning, and to deepen the democratic commitments of the whole sector.



Case studies *Participatory grantmaking and media*

Independence Public Media Foundation Community Voices fund

Independence Public Media Foundation (IPMF), is a US-based media foundation that supports Black-led, Indigenous-led, and people-of-colour led media organisations and media-making projects that help communities build their narrative power for equity and justice. IPMF, through its Community Voices Fund open call, supports community-led storytelling, community-centred news and journalism, archives for building community power, and narrative shift and movement-building media projects across the Greater Philadelphia region.

The foundation took a community-led decision-making approach for its 2023 Community Voices open call. In previous years, IPMF staff and board reviewed and made final grant decisions. Starting in

2023, however, grants will be reviewed by a panel of community members with deep relationships and expertise in the fund focus areas. The panel's decisions are final, without influence from the IPMF board or staff. IPMF Programme Officer Nuala Cabral described the panel as representing 'folks who have traditionally been excluded from philanthropy while also being impacted by harmful media narratives and who understand what is at stake and what is possible in regard to media-making and narrative shift.'³⁰

Clwstwr and Media Cymru

Clwstwr was a three-year, AHRC-funded project, which funded research and development by academics, industry and media producers in South Wales. This brought in a larger grant of £50m that was used to set up Media Cymru. Both Clwstwr and Media Cymru distributed grants, and while final decision-making has not necessarily been fully participatory, there have been a range of adaptations in how both funds work that are in line with PGM best practice,³¹ such as:

- ▶ In the early rounds of Clwstwr, the applicant pool was limited, so they brought in 'Idea Hub' days, with stipends and childcare, which changed the profile of the applicants and the work they were doing;

- ▶ Pre-application guidance was brought in, and all projects have a consistent relationship with a producer that allows for formal and informal feedback;
- ▶ Since transitioning to Media Cymru, the application process has been streamlined, reducing the ask on application forms (e.g., less financial and business information), and accepting applications in a variety of formats;
- ▶ The types of grants have been adapted so there is a clearer route through the funds; and,
- ▶ Funding decisions for Media Cymru are now made by an external panel of experts, with the potential for this structure to become more participatory and accountable in future.

1.4 Suggested values and principles for a participatory journalism fund

Best practice would suggest that a journalism fund should run its own participatory process to establish its principles and values. However, to illustrate what this could look like, this section draws on the Media Reform Coalition's Manifesto for a People's Media, which was

produced out of large-scale consultation in 2021. The manifesto identified four core values of a media that functions for the public good and for democracy: that media should be independent, accountable, democratic and for everyone.³²

The table below shows how these values could be used to structure both a) the kinds of news providers a participatory journalism fund might seek to support, and b) the operations of the fund itself. (Appendix 3 shows the democratic benefits for citizens and government bodies of a media based on these values.) It also illustrates how a fund can safeguard the independence of its grantees, by focusing on how those grantees operate, rather than seeking to police the content they produce.

Values	For grantees, this will mean:	For the fund, this will mean:
Independent <i>Independent of powerful interests and able to hold them to account</i>	<ul style="list-style-type: none"> — Not aimed at profit-making and returns for shareholders — Not being funded by or having organisational connections to a political party — Having mechanisms to protect worker rights, recognise collective power and respect unionisation 	<ul style="list-style-type: none"> — Non-partisan — Donors do not have undue influence on priorities decision-making

Values	For grantees, this will mean:	For the fund, this will mean:
<p>Accountable</p> <p><i>Facing consequences when they cause harm</i></p>	<ul style="list-style-type: none"> – Independent and meaningful regulation, including having co-creational practices in defining harm and redress* – Formal and informal channels for feedback and complaints – Having internal mechanisms of accountability to ensure respectful and non-discriminatory working practices* – Being transparent about use of AI in news production processes <p><i>*N.B these could be achieved through Impress membership</i></p>	<ul style="list-style-type: none"> – An iterative process, taking feedback and adapting process between rounds – Formal and informal channels for feedback and complaints – Adequate staff time and resourcing to invest in relationships
<p>Democratic</p> <p><i>Participatory and representative of diverse lives</i></p>	<ul style="list-style-type: none"> – Forms of participation within the workforce, and the wider public they serve, in setting editorial direction, structures of governance and organisational strategy – Support for under-represented and excluded groups to participate 	<ul style="list-style-type: none"> – Affected communities are involved in setting priorities, strategy and grantmaking decisions – Codes and practices are regularly reviewed, with input from a broad range of citizens

Values	For grantees, this will mean:	For the fund, this will mean:
<p>For everyone</p> <p><i>Serving everybody's needs and accessible to all</i></p> <p><i>N.B. This applies to the whole media ecosystem rather than specific outlets</i></p>	<ul style="list-style-type: none"> – Content funded by grants is freely available to the communities served³³ – High accessibility standards to meet community needs e.g., compatibility with e-readers, large print editions³⁴ – Non-discriminatory in practices and outputs 	<ul style="list-style-type: none"> – Participation is adequately resourced and remunerated, ensuring underrepresented communities are supported to take part – Fostering an ecosystem for niche news providers to share audiences and identify shared relevant content – An accessible application process – Investing in digital and distribution infrastructure for technical accessibility and intercultural sharing

2. Tool

Designing a participatory journalism fund

This tool is adapted from GrantCraft's overview of PGM, *Deciding Together*.³⁵ It reproduces some of the questions they suggest for those designing participatory funds, while adding specific questions for those wishing to support news organisations.

2.1 Purpose

PGM best practice: while funds may have several motivations for adopting participatory mechanisms, it is crucial that there is a genuine desire to cede power from the institution, rather than merely consulting with communities and stakeholders. However, before a participatory process can be instigated there will need to be some agreed parameters, which could be established by considering these questions in the light of the four values explored in section 1.4.

Questions for journalism funders:

- ▶ What is the purpose of using a participatory grantmaking approach e.g., build/strengthen the sector, surface issues or trends, empower communities, leadership development, capacity building, getting more informed results, fostering new ideas/innovation etc?

- ▶ How will you define success and how will this be measured or assessed? What kind of evaluation or research will be necessary to measure more diffuse outcomes e.g., improvements in democratic engagement?

2.2 Structure

PGM best practice: PGM aims to shift power away from directors, trustees, donors, and staff, and towards grantees and communities. While institutional actors may be part of the decision-making process, their participation is managed so they are not allowed to dominate proceedings. Institutional needs, such as around risk management, should be approached as shared problems, in which the funder takes on more of the administrative burden, e.g., of complying with charity law, rather than placing this upon grantees.

Questions for journalism funders:

- ▶ Are staff, board or governance members part of decision-making? If so, what percentage?
- ▶ Are community decision-makers part of any other committees or operational processes?
- ▶ Are you creating a specific fund targeted at news organisations, or making it easier for news organisations to apply to/be eligible for existing funds? If the latter, how to equip decision-makers to assess the relative value of journalism?

- ▶ If the fund is charitable, how are you understanding the relationship between journalism and charity? (See box below.)



Journalism and charity

Charitable trusts and foundations giving grants to newsrooms will need to consider how this relates to their obligations under charity law. From the charitable donor's perspective, the most straightforward way to grant this money is for the recipient themselves to be a registered charity. The Charitable Journalism Project has been campaigning to make this easier in England and Wales, and has produced useful scholarship on the legal arguments for this.³⁶

However, others have argued that charitable registration may create unhelpful administrative burdens for newsrooms while impeding their independence from the state – especially given the ongoing weaponisation of charity law to suppress criticism of government from the third sector.³⁷ Alternative ways to navigate these issues could include:

- ▶ Creating pooled funds from charitable and non-charitable donors, where higher risk applications can be supported from noncharitable sources;

- ▶ Match funding with noncharitable sources at the organisational level e.g. matching reader subscriptions, so that their overall funding mix is majority noncharitable;
- ▶ Providing access to legal advice, and support for budgeting and administering project funding to ensure that charitable funding is only used for charitable activities;
- ▶ Supporting newsrooms to adopt legal structures such as Charitable Community Benefit Societies, which can access some charity funding without the burdens of charitable registration;
- ▶ Lobbying for a new tax status for public interest newsrooms e.g. Gift Aid on donations.³⁸

From a PGM perspective, best practice would ensure that the assessment of charity and risk do not become a site where the funder is placing unreasonable administrative burdens on grantees or exerting excessive power.³⁹

Instead, navigating charity should be treated as a shared problem in which the funder has more capacity and resources to shoulder risk.

2.3 Priority-setting and strategy

PGM best practice: communities should be involved from the outset. Where possible, a collective process with equity and social justice at its heart should be designed to determine eligibility and develop funding criteria. Having multiple people engaged at this stage will also help ensure that decision-makers, wider communities and grantees understand the criteria and how they will be prioritised. Competing demands and trade-offs should be acknowledged, with a strong emphasis on building trusting relationships to navigate these competitive elements.

Questions for journalism funders:

- ▶ Who decides the grantmaking priorities and/or overall strategy for the fund? What is the structure and process for this?
- ▶ How are you defining the type(s) of journalism being prioritised? Public interest? Community? Investigative? What proportion of an organisation's work needs to take this form?
- ▶ If funding local journalism – how are 'regional', 'local', 'hyper-local' publishers being defined? How will the fund balance the needs of very different sized communities?
- ▶ Are there income thresholds, and if so, set at what level? What level of profit-making is eligible, if any?

- ▶ Are there eligibility criteria around working conditions, levels of pay, unionisation and/or worker control?

2.3 Types of grant

PGM best practice: PGM funders must strike a balance between having a clear, comprehensible structure, and a flexible one which can respond to a variety of needs. Long-term core funding is often prioritised as this makes grantees less dependent on funding cycles, but this is often combined with rapid response pots and/or start-up grants, as well as support in kind (e.g., legal advice, accountancy, training) especially where these are common needs across a range of grantees.

Questions for journalism funders:

- ▶ What kinds of grants will be provided? Are there different criteria or processes for each?
- ▶ Is the fund primarily aimed at innovation or providing core support for existing institutions, or a combination of both?
- ▶ How will the fund enable new players to emerge, especially within news deserts?
- ▶ Will the fund just support publishers, or also those developing enabling infrastructures?

- ▶ Will there be other ways to meet grantee needs beyond direct grants, such as access to backend administrative support, collective engagement with tech platforms etc.?
- ▶ Is the focus on larger grants/multi-year funding, or maximising the number of grantees, or a mix of both?

2.5 Decision-making

PGM best practice: there are a range of different models for selecting decision-making panels,⁴⁰ but they all have common elements. They anticipate decision-makers having formal and informal relationships to applicants, and often include potential recipients and/or former grantees on the panel. 'Conflicts of interest' are reframed as valuable forms of insight and knowledge and managed through conflict-of-interest policies and regular circulation of members.

Decision-making is undertaken in deliberative spaces, where panel members can negotiate, recognise each other's points of view and develop solidarity.⁴¹ These are facilitated spaces where minorities and marginalised voices can be heard. Relationships are highly valued – between panel members, between members and staff, and between the institution and grantees – recognising that these allow deeper kinds of feedback and generate trust in the process. Panel members are recompensed for their time in order to make participation accessible.

Questions for journalism funders:

- ▶ Who is on your grants selection panel? How are they selected? Are there designated slots for various stakeholders (e.g., practitioners, union representatives, civil society, academics, former grantees)? Do you want to ensure a mix of gender, ethnicity, disability, other protected characteristics?
- ▶ How do people circulate in and out of the decision-making group?
- ▶ What is the grant decision-making process? Are there stages to this? How do final decisions get made (e.g., consensus, voting, etc.)?
- ▶ Is there a conflict-of-interest policy or process?
- ▶ What happens if there is disagreement in the decision-making committee? How is this resolved (e.g., consensus, voting, etc.)?
- ▶ Will participants be compensated for their time, and if so, which expenses are covered?
- ▶ Will participants meet primarily online or offline, and how will this be supported?
- ▶ What kind of group culture will you aim to create among decision-makers?

- ▶ How will sessions be facilitated and relationships supported?
- ▶ How will decision-makers be accountable and to whom?

2.6 Operations

PGM best practice: operations are a crucial element of making a fund accessible and addressing power dynamics between funders and grantees. This includes making application processes simple and providing support for applicants; ensuring eligibility and funding criteria are transparent; giving constructive feedback, including to unsuccessful applicants; and ensuring reporting supports learning and reflection for grantees rather than meeting funders' needs. This requires adequate resources for staff to invest in relationships and engage in outreach.

Questions for journalism funders:

- ▶ Who is eligible (individuals and/or organizations)? Open, Letter of Interest (LOI), or invitation only? If 'invitation only,' who decides to whom the invitation is extended?
- ▶ How often? (rolling, times per year, etc.)
- ▶ Can applicants get assistance in applying? If so, what kind and by whom?

- ▶ Who does the initial proposal vetting/ due diligence to ensure eligibility? How is this done?
- ▶ Do you have reporting requirements? How can this be designed as a way of news organisations being accountable to their communities and learning from one another?
- ▶ Do you do any kind of formal evaluation?
- ▶ How much outreach will staff do? How much support will there be for applicants, especially for new entrants? How will staff be resourced for this?
- ▶ Will the fund be offering project funding or core funding? What level of budget detail is necessary, and at what stages?
- ▶ How will data be collected on applicants who reach different stages, and what data will be made public?
- ▶ How will the fund give high-quality feedback to applicants who reach all stages?

3. Proposal

A £100m-a-year journalism fund

The Cairncross Review recommended the creation of an Institute for Public Interest News to distribute new streams of public funding. While this recommendation was rejected by government, it has since been echoed by the DCMS Select Committee,⁴² Nesta,⁴³ and the News for All campaign⁴⁴ – though none of these have been more specific than Cairncross about how this fund should be designed.

The proposal below provides a framework for how PGM could be built into a fund of this kind, imagining that the funding available was expanded to £100m a year over 10 years. (See box below for why we have chosen this figure.) A fund of this kind would face significant scrutiny and its decisions would be likely to invite controversy in a way that smaller funds would not, but bold proposals of this kind are necessary given the scale of the challenge.

While the structure described below may seem complex, all the steps described would be necessary in some form, whether participation was embedded within them or not. Allowing the wider public and those with a range of relevant expertise to participate would bring the fund into line with best practice in other public institutions such

as the NHS, which has created a network of community advisory boards and patient committees to advise its work. And by creating these forums for debate and discussion, and building and strengthening relationships, the fund would itself be contributing to a renewed democratic culture and a thriving news ecology.



Why £100 million?

Cairncross' vision for the Institute for Public Interest News recognised the uncertainties of the current landscape and thus did not provide specific figures for its budget, beyond recommending beginning with a £10m a year innovation fund. However, she anticipated that sector needs might be substantially higher, and that over time the institute 'might evolve into a body somewhat resembling the Arts Council in scale, reach and perhaps budget'.⁴⁵

Our figure of £100m a year reflects the worsening situation for newsrooms and growing news deserts since 2019. While it would be a substantial investment, it would be genuinely transformative to the independent news sector, given its estimated current annual revenues of £20-40m.⁴⁶

For comparison:⁴⁷

- ▶ £100m is around £1.45 per capita – less than the average cost of a daily newspaper (£1.70).
- ▶ Public investment in Arts Council England was £543m in 2022-2023.

The New Zealand government recently invested NZ\$55m to fund public interest journalism over three years. Adjusting for population size, the equivalent expenditure for the UK would be around £140m a year for three years.

We recognise that a huge expansion of funding of this kind would require a range of new structures to absorb it, and in practice the fund may need to distribute smaller amounts at the outset and expand over time to £100m, though for simplicity's sake the proposal treats the annual budget as static. The minimum ten-year timeframe is a necessary guarantee for new organisations setting up within the space.

3.1 Purpose

The principal aims of incorporating PGM into the journalism fund would be:

- ▶ To ensure **accountability** of how public money is being spent, especially in the light of how much public subsidy has historically been channelled towards harmful media institutions acting against the public interest;
- ▶ To create **buy-in and awareness** of the fund amongst the wider public, by using grantees as a publicity network to communicate how the participatory process works;
- ▶ To channel resources towards **marginalised and underrepresented communities** who have historically experienced harm from news organisations.⁴⁸

3.2 Structure

We propose a federated structure, with devolved bodies for Scotland, Wales, Northern Ireland and nine English regions.⁴⁹ These would distribute £80m a year⁵⁰ to publishers based in their nations and regions, with a further £20m a year distributed by a UK-wide body, including a national Equity Board (for this body's remit see section 3.4).⁵¹ In the event that any journalism funds already exist at devolved levels when a national fund is

established, those with expertise on devolved matters should consider how they intersect based on broad principles of democracy and equity.

The fund would have an internal complaints mechanism, alongside an independent backstop regulator tasked with handling escalated complaints and undertaking periodic reviews. The UK Press Recognition Panel structure for ensuring independence of press regulators from government would be an appropriate model for this. Steps should be taken to ensure that public money being distributed through the fund was exempt from any conditions that would inhibit their free speech such as anti-advocacy clauses in government contracts.⁵²

3.3 Priority-setting and strategy

We propose that a national framework determining eligibility for the fund and priorities for funding should be created by a Citizens Assembly, selected using sortition. There will be a national panel of 120, made up of ten people from each devolved nation and English region, selected according to key demographic criteria to ensure the final group included representation of a range of marginalised identities and protected characteristics. The resulting 120-person assembly would hear from relevant experts – including newsrooms and those who have conducted research on what the wider public want from news organisations – and then engage in a deliberative process to determine:

- ▶ **Eligibility criteria**, including turnover thresholds, levels of acceptable profit-making (if any), what constitutes meaningful regulation and accountability, working conditions such as pay levels and pay ratios and union representation, 'local' relevance and connection for local and regional publishers;
- ▶ Broad **priorities for the fund**, including participatory practices, organisations providing news for excluded and underserved communities, investigative or solutions journalism, innovations in democratic accountability;
- ▶ Principles for selecting participants for the **decision-making panel** – for example if decision-makers should include union representation, civil society leaders, academics and/or grantees, as well as ensuring demographic balance and representation of minorities.

Once the national framework had been agreed, assembly members from each devolved nation and region would tailor these principles to their own specific needs, such as considering Welsh language provision in Wales or ensuring cross-community representation in Northern Ireland. Broad-based consultation on this framework and principles should be undertaken every three years to ensure it remains relevant, mirroring the Impress model of revisions to its Code.⁵³



Case study

Citizens Assemblies and Citizens Panels

Mini-publics – such as Citizens Assemblies, Panels and Juries – are participatory democratic processes that seek to engage a representative group of citizens in decision-making. Citizens Assemblies are typically larger bodies that aim to address complex and politically significant issues, while Citizens Juries and Panels may be smaller and more focused (though sometimes these terms are used interchangeably). They often use stratified sampling, known as sortition, to ensure that citizens from relevant groups are recruited, and may seek to overrepresent certain minoritised people or communities.

Mini-publics have been used to set referendum questions, consider the use of biometric technologies, and to look at the barriers to households reducing their carbon emissions.⁵⁴ As a media-related example, in 2022, the Institute of Welsh Affairs and the Open University ran a Citizens Panel to understand how news and information in Wales can be improved. The 15-person panel was selected according to a set of eight demographic targets, including gender, ethnicity, Welsh speakers, and Senedd voters. The group spent 19 hours together online, learning from experts in the field,

deliberating on their views collectively, and putting together recommendations.⁵⁵

Mini-publics can be costly – a Citizens Jury can cost £15-20,000 for 2 days⁵⁶, and the 2019 UK Climate Assembly cost around £520,000⁵⁷. For smaller or more targeted journalism funds, assembling a demographically representative group of this kind to set its parameters and priorities would probably be unnecessary. However, in the context of large-scale public funding, we believe that integrating mini-publics would significantly strengthen the legitimacy of the fund.

3.4 Types of grants

While the 12 devolved bodies would have autonomy to set the balance of types of grants and grant size, they should all provide a mix of:

- ▶ Multi-year core funding (including salaries) for established **publishers serving regional, local and hyper-local** audiences;
- ▶ **Grants** for start-ups and new entrants, especially in news deserts;
- ▶ **Scale up funding** to support and spread innovation.

The UK-wide pot would provide funds for:

- ▶ Multi-year core funding for **established national publishers**, and those serving geographically dispersed communities;
- ▶ **Infrastructure** to support the sector e.g., digital innovation to support distribution;
- ▶ **Seed funding** for communities who are missing from the applicant pool.



Infrastructure funding *Citizens Assemblies and Citizens Panels*

PGM practitioners recognise that direct grants are not the most suitable or useful kind of support for all organisations, and often aim to go 'beyond grantmaking' by offering access to services such as lawyers, hosting convenings, or investing in buildings or land. For independent news organisations, this kind of infrastructural support could look like providing easy registration for press cards, communication channels with digital platforms, or access to low-cost printing. Bodies such as ICNN⁵⁸, the IMA⁵⁹ and Impress⁶⁰

have already scoped many of these needs, and could act as intermediaries to reduce the need for lengthy applications or complex eligibility criteria.

Infrastructure funding could also fund digital infrastructure to distribute news or facilitate monetisation of content. An example of this is the recently launched Ping! newswire, developed by ICNN. This provides a simple mechanism for independent news providers to receive payments when original journalism is reused by other publishers, which should provide a small but steady income stream. Additional grant funding could support Ping! to develop additional revenue streams for those featured on the service or support other initiatives of this kind.

3.5 Decision-making panel and process

As outlined in section 3.3, principles for how the decision-making panel should be selected would have been developed by the Citizens Assembly at the national level, and then tailored to the devolved nations and regions. After this, there would be a public callout for decision-makers, alongside solicited applications to ensure an applicant pool with sufficient

demographic diversity. Each devolved group from the Citizens Assembly would select ten initial decision-makers for the fund in their area in line with their agreed principles. They would also delegate two members to select ten initial decision-makers for the UK-wide fund, as well as a five-person Equity Board.

These decision-makers would then receive training on the criteria and priorities by the Citizens Assembly, in order to develop a shared understanding of their purpose and rationale. Applications would be received, scored according to these criteria, and then discussed in a series of meetings. Decisions would be made using methods deemed appropriate by the Citizens Assembly.⁶¹

A proportion of the decision-makers⁶² would step down each round and could not be part of decision-making for more than three rounds in the lifetime of the fund. If deemed appropriate by the Citizens Assembly, grantees could join as decision-makers in later rounds of the fund. Once grant decisions had been made by the devolved and UK-wide bodies, the Equity Board would have responsibility to look at the overall portfolio of grants in relation to a set of equalities criteria and distribute a small number of additional grants and seed funding to address significant gaps.

3.6 Operations

While a detailed account of operations is beyond the scope of this proposal, in broad terms the fund would have the following operational requirements:

- ▶ **Adequate staffing** to ensure participatory processes are well organised and facilitated, outreach can be undertaken and support provided to applicants;
- ▶ Clear **eligibility criteria**, simple application processes, transparent data including on unsuccessful applications;
- ▶ **Reporting processes** that support grantees' learning and facilitate their accountability to communities and stakeholders;
- ▶ Building **evaluation and learning** into every stage of the fund, with operations adapted between rounds in response to feedback.

Appendix 1: About the authors

This guide is the product of a collaboration between the Media Reform Coalition (MRC) and the Public Interest News Foundation. The lead author is Dr Debs Grayson, who was the Campaign Coordinator on the MRC's *BBC and Beyond* campaign (2021-2023) working with Professor Natalie Fenton of the MRC and Goldsmiths, University of London. Debs also has a background in participatory grantmaking, being a long-standing member of the Edge Fund, and conducting a consultancy for the Joseph Rowntree Charitable Trust which led to the establishment of a participatory Movements Fund in 2022.⁶³

The Media Reform Coalition was founded in 2011 and brings together activists, academics and media producers to challenge unaccountable media corporations and build an independent, democratic media system. MRC believes that democratically controlled funding will be a crucial part of media practices of the future.

The Public Interest News Foundation (PINF) is the first charity in the UK with a remit to support public interest journalism. PINF believes that everyone in the UK should benefit from high-quality news that speaks to them, for them and with them. PINF is keen to explore the potential for a participatory model of grantmaking, to ensure that news providers are meeting the real needs of their communities.

The Institute of Welsh Affairs is a think tank and charity, independent of government and political parties. By bringing together experts from all backgrounds, the IWA conceives ambitious and informed ideas which secure political commitments to improve Wales' democracy and economy. The IWA wants to see Wales' civic sphere grow and strengthen, and has a track record of encouraging a more sustainable media landscape for Wales, with current work focused on the importance of citizens' voices in shaping a more effective and inclusive journalism industry.

This guide received input and feedback from a number of other individuals and organisations. Many thanks to: Pip Eldridge (Voice of the Listener and Viewer); Hannah Ross and Illary Valenzuela-

Oblitas (Edge Fund); Carrina Gaffney (Lankelly Chase); Matt Ryan (University of Southampton); David Allan (Participatory Budgeting Scotland); Jez Hall (Shared Future); Arwel Jones (Books Council of Wales); Sally Griffith and Laolu Alatise (Media Cymru); Dylan Moore (Institute of Welsh Affairs); Thomas Barlow (Impress); Sameer Padania (independent consultant at Macroscope); Eliz Mizon (Bristol Cable); Emma Meese (ICNN); Tchiyiwe Chihana (IMA); Nathan Sparkes (Hacked Off).

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Appendix 2: Further reading and resources

Participatory Grantmaking

- Gibson, C. *Deciding Together*. GrantCraft, 2018.
- Paterson, H. *Grassroots Grantmaking: Embedding Participatory Approaches in Funding*. A Winston Churchill Fellowship Report, 2020.
- Evans, L. *Participatory Philanthropy*. A Winston Churchill Fellowship Report, 2015.
- Participatory Grantmaking Global Community of Practice – resources page.

Journalism and News Provision in the UK

- Barclay, S., Barnett, S., Moore, M. and Townend, J. *Local News Deserts in the UK*. Charitable Journalism Project, 2022.
- Padania, S., Goodman, E. and Angles-D'Auriac, L. *A New Deal for Journalism*. Forum on Information and Democracy, 2021.
- Mitchell, J., Roche, M. and Milburn-Curtis, C. *Deserts, oases and drylands: mapping the UK's local news outlets*. PINF, 2023.
- DCMS. *Sustainability of local journalism full report*. House of Commons, 2023.
- Cairncross, F. *The Cairncross Review: A Sustainable Future for Journalism*. Department for Digital, Culture, Media and Sport, 2019.

Journalism and Funding

- McChesney, R. W. and Nichols, J. To Protect and Extend Democracy, Recreate Local News Media. Free Press, 2022.
- Clark, M. and Powell, T. Architects of Necessity: BIPOC News Startups' critique of Philanthropic Interventions. The Pivot Fund, 2023.
- Watkins, L., Media Influence Matrix: United Kingdom. The Media Reform Coalition, 2021

Appendix 3: Democratic Impacts of Democratic Media

As the Media Reform Coalition has often argued, a democratic media is not an end in itself – its ultimate goal is to enable a more democratic society and culture. Using the four suggested values for a participatory journalism fund, the table below identifies some of the democratic outcomes, for both citizens and government bodies, of having a news media ecology which is independent, accountable, democratic and for everyone.

Values	For citizens, the democratic outcomes will be:	For government bodies, the democratic outcomes will be:
Independent	<ul style="list-style-type: none"> – Citizens are more informed about issues that affect them – Powerholders are better held to account – Citizens trust media not to be influenced by vested interests 	<ul style="list-style-type: none"> – Corruption is easier to challenge – Media prevent undue influence of government by corporate interests and wealthy individuals – Positive stories about government are more trusted

Values	For citizens, the democratic outcomes will be:	For government bodies, the democratic outcomes will be:
Accountable	<ul style="list-style-type: none"> – Information is more accurate – Media are less harmful to individuals and communities – Complaints systems are more effective – Funding is more transparent 	<ul style="list-style-type: none"> – Reporting on government is more accurate – Relations between Parliamentarians and media are more transparent
Democratic	<ul style="list-style-type: none"> – Enhanced opportunities to develop democratic skills within news organisations – Greater knowledge of, and participation in, wider civil society and mutual aid networks – Better understanding of relevant public issues – Marginalised and excluded groups have better representation, and greater voice and power 	<ul style="list-style-type: none"> – Greater legitimacy due to higher voter turnout, participation in consultations, etc. – Reducing democratic deficits by being more representative and responsive – Enhanced opportunities to meaningfully engage with citizenry on public issues
For everyone	<ul style="list-style-type: none"> – Better understanding between communities and greater community cohesion – Local life is supported and sustained – culturally, socially and economically 	<ul style="list-style-type: none"> – Information on services and policies reaches more of the communities they are meant to serve – Disenfranchised and minoritised communities/people are reached

Endnotes

1. As the Media Reform Coalition has often argued, a democratic mPadania, S., Goodman, E. and Angles-D'Auriac, L. [A New Deal for Journalism](#). Forum on Information and Democracy, 2021.
2. Cairncross, F. [The Cairncross Review: A Sustainable Future for Journalism](#). Department for Digital, Culture, Media and Sport, 2019; DCMS. [Sustainability of local journalism full report](#). House of Commons, 2023.
3. Cairncross, F. [The Cairncross Review: A Sustainable Future for Journalism](#). Department for Digital, Culture, Media and Sport, 2019.
4. Following its recent acquisition of Archant, Newsquest now controls over 30% of all local newspapers. Together with Reach and National World, these three publishers control 70% of all local news titles. These companies have engaged in consolidations and cost-cutting measures, leading to the closure of hundreds of titles and the hollowing out of those left, where little of their content is 'truly local'. News deserts have been mapped by the MRC, with 2017 research showing that 45% of Local Authority Districts (LADs) in the UK – in which 57.9% of the population live – had no daily local newspaper. Canterbury Christchurch University research in 2021 found that 4.6% of postcodes had no local print newspapers at all, and 30.7% had only one title – usually a weekly newspaper. See: [Media Reform Coalition submission to Digital, Culture, Media and Sport Committee on the sustainability of local journalism](#). Media Reform Coalition, 2022. PINF's '[Deserts, Oases and Drylands](#)' report in 2023 found that 4.1m people live in local authorities with no dedicated local news outlet.
5. Legacy news brands have far higher reach online than newer, digital-first outlets. See: MRC. [Who Owns UK Media?](#) Media Reform Coalition, 2021.
6. Impress [News Literacy Report](#). Impress, 2022. Impress is the only independent press regulator in the UK that is recognised under the Royal Charter set up after the Leveson Inquiry into culture, practices and ethics of the British press.
7. E.g., in the first month of The Bournemouth Observer, a digital news site launched in June 2023, the site used stock images for its 'team' of journalists and contained inaccurate stories which appeared to have been AI generated. See, Sharman, D. [Fake Journalists Used to Launch Local News Title](#). Hold the Front Page, 2023.
8. For media harms to minorities, see e.g. the [Centre for Media Monitoring's](#) work on Islamophobia, [Trans Media Watch's](#) reports on transphobia, research on the far right such as Hacked Off. [White Supremacism and the Press](#). Hacked Off, 2020. For evidence on disengagement and news avoidance, see Newman, N. [Digital News Report 2022](#). Reuters, 2022. For negative impacts of misinformation in news deserts see Barclay, S., Barnett, S., Moore, M. and Townend, J. [Local News Deserts in the UK](#). Charitable Journalism Project, 2022.
9. Edelman. [2021 Edelman Trust Barometer UK Findings](#). Edelman, 2021.
10. For general evidence on democratic deficits, see Brown, G. [A New Britain: Renewing our Democracy and Rebuilding our Economy](#). Commission on the UK's Future, 2022. For evidence about the relationship between news deserts and democratic deficits, see Barclay, S., Barnett, S., Moore, M. and Townend, J. [Local News Deserts in the UK](#). Charitable Journalism Project, 2022.
11. Working Group on the Sustainability of Journalism. [A New Deal for Journalism](#). Forum on Information and Democracy, 2021
12. Some evidence from the US indicates that new business models capable of sustaining local journalism on the scale needed are failing to materialise (McChesney, R. W. and Nichols, J. [To Protect and Extend Democracy, Recreate Local News Media](#). Free Press, 2022, pp. 9-10.) Although others are more hopeful that long-term subsidies won't be necessary, the uncertainty around this was also recognised by Cairncross: 'the future of local and regional reporting is so uncertain that there is no way of guaranteeing that it will retain even its present diminished scope, without some form of permanent aid'. Cairncross, F. [The Cairncross Review: A Sustainable Future for Journalism](#). Department for Digital, Culture, Media and Sport, 2019, p.102.
13. For example, some participatory element has become a standard requirement of many Arts Council England funding applications - see [Applicant guidance for People and Places programme](#), p.6.
14. Philanthropic funding for journalism in the UK remains rare and small-scale and therefore unlikely to significantly impede the independence of newsrooms. However, in the US – where this funding happens on a much larger scale – negative impacts have been documented, including newsrooms shaping their work to fit with donor priorities rather than community needs, and funding criteria leading to the continued exclusion of organisations serving communities of colour. See Clark, M. and Powell, T. [Architects of Necessity: BIPOC News Startups' critique of Philanthropic Interventions](#). The Pivot Fund, 2023.
15. Heawood, J. and Peter, F. [Co-creational Media: committing to truth and public participation](#). PINF, p.1.
16. For VAT exemption and BBC LDERS figures, see MRC. [Media Reform Coalition submission to Digital, Culture, Media and Sport Committee on the sustainability of local journalism](#). Media Reform Coalition, 2022. For the £200 million figure for the All In, All Together campaign see Cathcart, B. [Submission to the Hallett Inquiry by the Public Interest News Foundation and Others](#). PINF, 2023. For public notices, see Heawood, J. [The Sustainability of Local Journalism](#)

DCMS Select Committee Inquiry. PINF, 2022.

17. Furthermore, these limitations can be hard to detect because of the power dynamic that exists between funders and communities, meaning that actual and potential grantees shape their work to fit funders' priorities rather than accurately portraying the work they think is necessary. See: INCITE! Women of Color Against Violence. *The Revolution Will Not Be Funded*. Duke University Press Books, 2017.
18. Gibson, C. *Deciding Together*. GrantCraft, 2018, p.7.
19. PB is most embedded in Scotland, where 1% of local authority budgets are distributed this way, but in practice this is quite uneven, and this remains a small proportion of public money compared to other examples internationally – though these are now trying to scale up e.g., the NE Scotland Just Transition Participatory Budgeting fund: jtpbfund.scot.
20. We acknowledge that this is a simplification of the rather complex distinction between PB and PGM (e.g., some consider PB to be a type of PGM, while others see them as entirely separate). Some PB processes in Scotland are now run on a regular basis and have established ongoing relationships with communities and other stakeholders. However, PB does tend to focus on immediate, visible, neighbourhood-level change, and some of the learning from PB is that participation significantly drops off for longer term and infrastructural questions,

which would likely also be the case for news providers. See: Smith, G. *Democratic Innovations*. Cambridge University Press, 2010.

21. Paterson, H. *Grassroots Grantmaking: Embedding Participatory Approaches in Funding*. A Winston Churchill Fellowship Report, 2020.
22. Johnson, R., Longhurst, R., Love, K., Pochee, M. *Foundations Are Undermining Social Equity Under the Guise of Accountability*. Chronicle of Philanthropy, 2021.
23. These methods include having clear transparency requirements around relationships, and decision-makers recusing themselves from relevant decisions. For more, see the [Participatory Grantmaking Community Learning Session on Participatory Grantmaking and Conflicts of Interest](#) on YouTube.
24. Gibson, C. *Deciding Together*. GrantCraft, 2018, p.7.
25. <https://www.participatorygrantmaking.org/>
26. <https://www.edgefund.org.uk/>
27. <https://jrctmovementfund.org.uk/>
28. The question of whether any profit-making would be acceptable is complex, and there were differing views among those consulted for this guide. There is some evidence from the US that inflexible restrictions around profit-making can exclude precisely those communities who

have historically been unable to build up generational wealth. (See Clark, M. and Powell, T. *Architects of Necessity: BIPOC News Startups' critique of Philanthropic Interventions*. The Pivot Fund, 2023.) The broad language of 'core purpose' is used here to indicate that funding shouldn't go to companies which are primarily commercially driven, though ultimately it would be for those designing a specific fund to determine their own eligibility criteria and funding priorities. For an example of how eligibility criteria can include asset-locked social enterprises, see the Just Transition Participatory Budgeting fund: jtpbfund.scot.

29. For example, a fund could be targeted towards small companies (defined as two of: turnover under £10.2 million, balance sheet under £5.1 million, 50 employees or less) or towards micro-entities (defined as two of: turnover under £632,000, balance sheet under £316,000, 10 employees or less). See: <https://www.gov.uk/annual-accounts/microentities-small-and-dormant-companies>
30. *Independence Public Media Foundation Announces 2023 Open Call*. IPMF, 2023.
31. Guidance on PGM often stresses that 'being participatory' operates on a spectrum and that institutions can work to become more participatory in their operations, governance and design over time. See, the spectrum of participation in Gibson, C. *Deciding Together*. GrantCraft, 2018, p.58.
32. Grayson, D. *Manifesto for a People's Media: creating a media commons*. Media Reform Coalition, 2021. These values have similarities with the seven principles for participatory budgeting in the PB Charter for Scotland, namely that PB should be: fair and inclusive, participatory, deliberative, empowering, creative and flexible, transparent, and part of our democracy. See *PB Charter for Scotland*. PB Scotland.
33. We recognise that in the current context subscriber paywalls can be an important revenue stream for independent publishers. However, one of the functions of grant funding should be to make news and information available to those who need it, regardless of their ability to pay – whether by removing paywalls for some or all content, or by providing free subscriptions etc. Specific funds would need to consider how this fits with their own eligibility criteria and priorities, including transition plans for organisations using paywalls at the point of application.
34. As with the question of paywalls, publishers may not already meet these criteria at the point of application but could be enabled to do this work by the grant funding.
35. Gibson, C. *Deciding Together*. GrantCraft, 2018, p.39.
36. Barnett, S. Murdoch, T. and Townend, J. *Where public interest and public benefit meet: the application of charity law to journalism*. Journal of Media Law, 2022. For the Charitable Journalism Project, see: <https://cjproject.org/>

37. Grayson, D. [Should news organisations be charities? Only with caution](#). Media Reform Coalition, 2022.
38. As recommended by PINF – see Heawood, J. [The Sustainability of Local Journalism DCMS Select Committee Inquiry](#). PINF, 2022.
39. See the discussion on charitability and risk in Grayson, D. and Nkonde, M. [Developing a Pilot Movement Fund](#). Joseph Rowntree Charitable Trust, 2022, pp.17-18.
40. Evans, L., [Participatory Philanthropy: An Overview](#). Winston Churchill Fellowship, 2015.
41. These principles have similarities to governance structures such as sociocracy. See e.g. Bretones, L. [What is Sociocracy? Introducing a Toolkit for Agile Organisations](#). Holaspirit, 2020.
42. DCMS. [Sustainability of local journalism full report](#). House of Commons, 2023.
43. Sellick, V., Newman, I., Hamilos, A., Edmonds, K. and Newall, M. [Future News Pilot Fund: End of programme report](#). NESTA, 2020.
44. <https://www.publicinterestnews.org.uk/news-for-all>
45. Cairncross, F. [The Cairncross Review: A Sustainable Future for Journalism](#). Department for Digital, Culture, Media and Sport, 2019, p.101.
46. Cook, C., Heawood, J., Milburn-Curtis, C. and Mitchell, J. [Index of Independent News Publishing in the UK](#). PINF, 2022.
47. Press Gazette reported in January 2023 that the total cost of the ten Fleet Street dailies was £17. Saturday and Sunday newspapers are more expensive. Turvill, W. Newsflation: [UK National Newspaper Cover Prices Up 14% in a Year](#). Press Gazette, 2023. For Arts Council England figures see [Annual Report and Accounts for the year ended 31st March 2023](#). Arts Council England, 2023. For New Zealand journalism investment see [Expectations exceeded as Public Interest Journalism Fund comes to a close](#). NZ On Air, 2023.
48. See note 8 above.
49. The nine regions of England used by the Office for National Statistics are North East, North West, Yorkshire and the Humber, East Midlands, West Midlands, East of England, London, South East and South West. Alternative regional divisions that could be adopted are the five regions used by Arts Council England, or the 12 BBC regions.
50. The precise division of this £80 million between the 12 devolved bodies would be agreed by the Citizens Panel, taking into account population, existing media provision and news deserts, socio-economic demographics, Barnett formula conventions, etc.
51. This could be established by an executive ministerial decision, by an act of Parliament or by a Royal Charter.
52. Anti-advocacy clauses in government contracts, and the New Grants Standards introduced in 2016, have been criticised for having a chilling effect on legitimate civil society campaigning. See [Do as I say, not as I do: UK policy and the global closing space for civil society: a 2017 update](#). Charities Aid Foundation, 2017.
53. See the process described here: [Code Review 2020-2022](#). Impress, 2022.
54. For Irish abortion referendum, see: McKee, R. [The Citizens' Assembly Behind the Irish Abortion Referendum](#). Involve, 2018. For Citizens Biometrics Council, see: [The Citizens' Biometrics Council](#). Ada Lovelace Institute, 2021. For Shared Future CIC, see: [Citizen's Panel recommendations are praised by Lord Deben, the Chair of the Climate Change Committee as 'valuable evidence'](#). Shared Future, 2023.
55. The aim was to over-recruit within demographic categories typically underrepresented in democratic deliberation processes. The final report shows the difficulties they faced in achieving this given the low response rates among some target groups, as well as their relative successes given the response pool. See, Moore, D., Seargeant, P. and Smith, D. [Citizen's Voices, People's News: Making the Media Work for Wales](#). IWA, 2022.
56. [Citizens' Jury](#). Involve, 2023.
57. For UK Climate Assembly Cost, see: Harvey, F. [Thousands of Britons invited to climate crisis citizens' assembly](#). The Guardian, 2019.
58. The Independent Community News Network: <https://www.communityjournalism.co.uk/about-icnn/>
59. The Independent Media Association: <https://www.ima.press/>
60. The Independent Monitor of the Press: <https://www.impressorg.com/>
61. For a useful description of different decision-making mechanisms used in PGM, see Olliff, W. [How should we decide?](#) Medium.
62. The level of changeover of decision-makers between rounds will need to balance circulating power with maintaining continuity and institutional knowledge. While power can become concentrated in a small number of decision-makers if turnover is too low, if it is too high decision-makers can become overly reliant on paid staff to understand the process, rather than developing a peer-led culture among themselves. Between 40% and 60% would maintain this balance; precise numbers could set by the Citizen's Panel.
63. Grayson, D. and Nkonde, M. [Developing a Pilot Movement Fund](#). Joseph Rowntree Charitable Trust, 2022.

www.publicinterestnews.org.uk
www.mediareform.org.uk
www.iwa.wales

