

# **GHANA BROADCASTING CORPORATION**



## **PUBLIC CONSULTATION ON THE REVIEW OF GBC'S GOVERNING LAW**

**NOVEMBER, 2025**

# GHANA BROADCASTING CORPORATION

## INVITATION FOR COMMENT

1. The Ghana Broadcasting Corporation (GBC) is reviewing its current Governing Legislation to ensure its efficacy within the contemporary broadcasting landscape of Ghana.
2. We herewith invite views and comments from our stakeholders and the general public regarding this review.
3. In the interest of transparency, all responses will be considered non-confidential and will be published on our website upon receipt.
4. Written comments/responses can be submitted as email attachments in Microsoft Word format via this link: [board.secretariat@gbcghanaonline.com](mailto:board.secretariat@gbcghanaonline.com).
5. The public consultation is effective immediately and will close on 18<sup>th</sup> December, 2025.
6. All submissions must include a completed response cover sheet (refer to Page iii of the document).
7. We encourage respondents to specify the sections with which they agree or disagree.
8. By submitting your response, you grant the GBC the right to use the copyright and any associated intellectual property contained in your submission to meet its legal obligations.
9. Following the conclusion of the public consultation, the GBC will finalize the provisions and forward same to the National Media Commission for further engagement with government and parliament.

**Issued by  
The Director General,  
18<sup>th</sup> November, 2025**

# COVER SHEET FOR RESPONSE TO GBC PUBLIC CONSULTATION ON NEW LEGISLATION

## BASIC DETAILS

Name of respondent:

Representing (self or organisation/s):

Physical Address:

Digital Address:

Email Address:

Telephone Number:

## DECLARATION

I hereby confirm that the correspondence accompanying this cover sheet constitutes a formal consultation response. I consent to its full publication on the GBC website and authorize the GBC to utilize the information contained herein to fulfill its legal obligations. In the event that this response is transmitted via email, any standard disclaimer regarding the non-disclosure of email content and attachments shall be disregarded by the GBC.

Name:

Signed

# FORMAT FOR COMMENTING ON THE DOCUMENT

Section Number	Section Title	Comment	Suggestion / Proposed Amendment

# DRAFT CONSULTATION DOCUMENT FOR NEW GBC LAW

## 1. Introduction

### 1.1 About the Ghana Broadcasting Corporation

The Ghana Broadcasting Corporation (GBC) is Ghana's state-owned public broadcaster, established in 1935 as Radio ZOY and rebranded as GBC after independence.

GBC operates thirty one (31) transmitter sites dotted around the country, 6 national and 1 regional television channels, 17 radio stations broadcasting in 23 languages to serve the varied needs of the Ghanaian population.

The Ghana Broadcasting Corporation (GBC) has operated for five decades under its enabling Act, NRCD 226 of 1968. While this Act initially provided a framework for GBC's independent operation in information, education, and entertainment, profound social, economic, political, and technological transformations, coupled with the impact of subsequent legislation on GBC's powers, now necessitate a review and alignment of the Act to ensure its efficacy within the contemporary broadcasting landscape of Ghana. Recognizing this need, the GBC Board, at its 4th Ordinary Meeting, established this committee to develop proposals for the review.

### 1.2 Calls for the Review of the GBC Act

The calls to modernize the Ghana Broadcasting Corporation Act (NLCD 226) stem from several factors, primarily due to technological advancements, media competition, financial sustainability, and regulatory gaps. Here are the key justifications:

#### 1. Outdated Legal Framework

- The Act was enacted in 1968, during an era of state-controlled broadcasting with limited technological advancements.
- It does not adequately address modern broadcasting realities such as digital media, social media platforms, and the rise of private and online broadcasters.
- Over time, there have been amendments and other legal frameworks that impact GBC, such as:
  - The National Media Commission Act, 1993 (Act 449), which regulates media independence.
  - The Electronic Communications Act, 2008 (Act 775), which provides broader rules for broadcasting operations

#### 2. Media Liberalization & Competition

- At the time of NLCD 226, GBC was the only broadcaster, but today, Ghana has hundreds of private radio and TV stations competing for viewership and advertising revenue.
- The law does not sufficiently address GBC's role in a competitive media landscape, making it difficult for the corporation to adapt.

#### 3. Financial Sustainability Challenges

- The Act originally assumed government funding and license fees would sustain GBC, but funding has been inconsistent.
- Attempts to enforce TV license fees have been met with public resistance, as many believe GBC should compete for revenue like private broadcasters.

- There is a need to redefine GBC's funding model to ensure its sustainability while maintaining its public service mandate.

#### 4. Digital Broadcasting & Technological Changes

- The law does not account for the transition from analog to digital broadcasting, which has changed content distribution and audience engagement.
- With the rise of streaming services, podcasts, and online content, GBC needs a modern legal framework to remain relevant in the digital age.

#### 5. Governance & Independence

- There are concerns about alleged political interference in GBC's operations, as governments often attempt to exert influence over its management and content.
- A modernized Act could introduce reforms to strengthen GBC's editorial independence, making it a truly public service broadcaster rather than a government mouthpiece.

#### 6. Weak Enforcement Mechanisms

- The current Act lacks clear enforcement mechanisms to ensure that GBC operates effectively while fulfilling its public service obligations.
- It also does not clearly define how accountability and transparency in GBC's management should be handled.

To address these issues, media stakeholders have suggested:

- A new legal framework that reflects the realities of digital broadcasting.
- A revised funding model (e.g., partial commercialization, government subvention reforms, or new revenue streams).
- Clear independence safeguards to protect GBC from political interference.
- A defined role in the digital era, including online content regulations and digital broadcasting policies.

## 2. Review of GBC Legislation

### 2.1 Objectives for current review

The review focuses on modernizing the GBC Act, moving beyond the current structure to create a legal framework that supports a more technology-driven broadcasting culture and reflects the realities of today's media environment.

It will address the fundamental question of GBC's identity—specifically, GBC's role as a State, Public Service and Commercial Broadcaster. This examination will be coupled with an assessment of GBC's governance structure, including the composition and function of the Board and Management, and an analysis and proposed recommendations for a sustainable funding model.

### 2.2. Process for Review

The Committee emphasized a participatory approach to the review process, outlining the following key steps:

- Drafting of a consultation document.
- Publication of the consultation document to allow for stakeholder comment.
- Convening a stakeholder conference to actively solicit feedback on the consultation document and engage in a detailed examination of the proposed changes.
- Drafting of Act
- Engaging the Executive and Parliament through a formal consultation process.

The Committee discussed the importance of establishing realistic timelines for each phase of the review process. The following timelines are submitted for the Board's approval:

N	Item	Timeline	Action By
1.	Ad-Hoc Committee Created	December 2024	GBC Board
2.	Committee Meets (Objectives, Scope)	January-February 2025	Ad-Hoc Committee
3.	Committee Shares Proposals/Timelines	February 2025	Ad-Hoc Committee
4.	GBC Board Approves Consultation Document	July 2025	GBC Board
5.	Consultation Document Shared	September 2025	Ad-Hoc Committee
6.	Validation of Consultation	October 2025	GBC Management, GBC Board, Stakeholders
7.	Hiring of Consultant/Drafting of Bill	October-November 2025	Consultant, Ad-Hoc Committee
8.	Draft Bill Handover to NMC	December 2025	Consultant, Ad-Hoc Committee
9.	Share with Executive	December 2025	GBC Management and Board

### 3. What GBC Should Be and Do

#### 3.1 GBC's Mission, Vision and Values

##### 3.1.1 Vision

*"To be Ghana's most trusted, innovative, and independent public broadcaster, delivering world-class content that informs, educates, and entertains diverse audiences across all platforms."*

##### 3.1.2 Mission

*"To provide high-quality, independent, and diverse content across television, radio, and digital platforms, promoting Ghanaian culture, democracy, and national development while ensuring financial sustainability through innovative revenue models and strategic partnerships."*

##### 3.1.3 Core Values

1. Independence & Integrity – We are committed to impartial, accurate, and responsible journalism that serves the public interest.
2. Innovation & Digital Transformation – We embrace new technologies and platforms to enhance content delivery and audience engagement.
3. Diversity & Inclusion – We reflect Ghana's diverse cultures, languages, and communities, ensuring representation for all.
4. Public Service & Accountability – We operate transparently, upholding the highest standards in broadcasting and governance.
5. Sustainability & Commercial Viability – We adopt a balanced approach to public service broadcasting, leveraging advertising, partnerships, and digital monetization to ensure financial stability.
6. National Identity & Cultural Promotion – We celebrate and preserve Ghanaian heritage while fostering national unity and global cultural exchange.
7. Excellence & Professionalism – We strive for high-quality content, ethical journalism, and continuous improvement in broadcasting.

##### 3.1.4 Strategic Focus for the Modern GBC

- Multi-Platform Expansion – Strengthening GBC's presence on digital, mobile, and social media platforms.
- Public-Private Partnerships – Exploring collaborations to enhance content production and financial sustainability.
- Editorial Independence – Ensuring GBC is free from political influence while maintaining its public service role.
- Audience Engagement & Growth – Using data-driven strategies to attract and retain a diverse audience base.

#### 3.2 GBC's Scale and scope

##### 3.2.1 GBC as a public service broadcaster

The original rationales for public service broadcasting were rooted in the idea that broadcasting should serve the public interest rather than purely commercial or political motives. GBC has a mandate as the public service broadcaster of the country. This role is accomplished through:



## 1. Universal Access

- GBC is the broadcaster that has the widest and most diverse terrestrial reach in Ghana, regardless of their geographic location or economic status.
- This role is especially important in rural areas where commercial broadcasters might not find it profitable to operate.

## 2. Educational and Cultural Development

- GBC continues to educate, inform, and entertain, promoting literacy, scientific knowledge, and cultural enrichment.
- GBC continues to provide high-quality content that could uplift society rather than just entertain for profit.

## 3. Political Neutrality and Public Interest

- GBC operates independently from political and corporate influence, ensuring objective and balanced reporting.
- This is vital for democracy, preventing the monopolization of media by private interests or state propaganda.

## 4. Promoting National Identity and Social Cohesion

- GBC fosters national identity, shared values, and social unity, often by promoting national languages, history, and cultural programming.
- This is especially important in the current media landscape in Ghana.

## 5. Providing a Platform for Diverse Voices

- GBC operates platforms that give voice to minority groups, regional communities, and underrepresented perspectives that might be ignored by commercial media.
- This includes supporting indigenous languages, artistic endeavors, and niche cultural programming.

## 6. Innovation and Quality Content

- Since GBC is not primarily driven by advertising revenue, it invests in experimental, high-quality productions that might not be immediately profitable but had long-term cultural value.
- Many award-winning documentaries, dramas, and educational programs emerged from these endeavours

Despite the rise of digital media, streaming services, and social media platforms, there are strong modern arguments for the continued relevance of GBC as a public service broadcaster:

## 1. Countering Misinformation and Fake News

- The digital age has led to an explosion of misinformation, especially on social media.
- PSBs, with their emphasis on editorial integrity, fact-checking, and impartial reporting, provide a trusted source of news in a time of widespread disinformation.

## 2. Ensuring Access to Quality Journalism

- Many commercial media outlets focus on clickbait and sensationalism to maximize ad revenue. GBC focuses on in-depth, investigative journalism, holding governments and corporations accountable without being driven by profit motives.

### 3. Cultural and National Identity in a Globalized World

- As global streaming giants like Netflix, Disney+, and YouTube dominate entertainment, local cultures can be sidelined.
- GBC supports local content production, including documentaries, dramas, and educational programs that reflect national identity.

### 4. Maintaining Independence from Corporate and Political Influence

- Social media platforms and commercial news outlets are often influenced by advertisers, corporate owners, and political interests.
- A well-funded and independent PSB ensures that important issues are covered without bias or commercial pressure.

### 5. Addressing the Digital Divide

- Not everyone has high-speed internet or access to premium content behind paywalls.
- PSBs ensure that everyone, regardless of income or geography, has access to high-quality news, information, and entertainment.

#### 3.2.2 GBC as a state broadcaster

GBC continues to play a role as a state broadcaster, albeit not dominant as in the past. This role is prominent in situations that require national unity and state interests, but has devolved from government control. This role is very prominent in the acquisition of sports rights for national team participation in international tournaments, coverage of and dissemination of state and national events, as well as the dissemination of official policies and public messaging. In Ghana's media landscape, GBC usually places a leading role in the coverage of state functions.

#### 3.2.3 GBC as a commercial broadcaster

GBC augmented its operations with commercial broadcasting beginning in the 1990s in response to the country's political and media liberalization. With the adoption of the 1992 Constitution and the return to democratic governance, Ghana experienced increased freedom of expression and press freedom. This environment encouraged the deregulation of the broadcasting sector, ending GBC's monopoly and allowing private media to flourish. Faced with growing competition, GBC had to adapt by offering more engaging content and generating revenue through commercial means such as advertising and sponsored programs.

Additionally, economic reforms and a shift toward reduced government funding pushed GBC to seek financial sustainability. Advances in broadcasting technology during the period, such as satellite and FM transmission, also enabled GBC to expand its reach and diversify its offerings. As audience expectations evolved and the media landscape became more competitive, commercial broadcasting became a strategic necessity for GBC to maintain relevance and fulfill its mandate in a changing Ghanaian society.

## 4. Funding GBC

### 4.1 Deficiencies of Current Model

The current funding model of the Ghana Broadcasting Corporation (GBC) has several key deficiencies that undermine its effectiveness and sustainability as a public service broadcaster:

1. Inadequate Government Subvention - GBC relies heavily on limited state funding, which is often delayed or insufficient to cover operational and programming costs.

This hampers its ability to invest in quality content, modern technology, and nationwide coverage.

2. Weak TV License Funding Mechanism - The TV license, intended as a primary source of public funding, has faced legal, political, and public resistance.

Non-payment by citizens and lack of effective enforcement have rendered it an unreliable and politically contentious revenue stream.

3. Overdependence on Commercial Revenue - In the absence of stable public funding, GBC leans heavily on advertising and sponsorship, which can compromise its editorial independence.

This commercial pressure may push GBC to prioritize entertainment over its core public service mission, such as education, culture, and minority representation.

4. Lack of Transparent and Sustainable Funding Framework

There is no well-defined or legally protected funding structure that guarantees predictable and long-term financing.

This uncertainty makes long-term planning and strategic development difficult.

In summary, GBC's current funding model suffers from instability, and insufficient public support mechanisms, which collectively weaken its ability to operate as an independent, high-quality public broadcaster.

### 4.2 New Funding Model

To ensure the Ghana Broadcasting Corporation (GBC) can sustainably fulfill its public service mandate while remaining independent and competitive, a hybrid funding model is the most appropriate. This model combines public, commercial, and innovative revenue streams to create a stable, transparent, and diversified financial base. The proposed structure is a modified and modernized TV License Model –

- a. Replace the old TV license with a universal media fee or public media levy (similar to Germany's household contribution model).

- b. Collect through a neutral system (e.g., utility bill integration) with:

- i. Clear exemptions for vulnerable groups,

- ii. Strict transparency and public accountability on fund use.

- c. Annual audits and public reporting on revenue use and impact.

#### 4.3 Value for Money and Efficiency in new funding model

To ensure **value for money** and **efficiency** in the **modified and modernized TV License Model** for the Ghana Broadcasting Corporation (GBC), several key principles and mechanisms will need to be built into the design, collection, and utilization of the license fee. This will be achieved through:

##### **1. Transparent and Accountable Collection System**

- Automated and integrated payment through utility billing platforms to reduce administrative costs and evasion.
- Implement a centralized digital tracking system to monitor payments and reduce leakages or fraud.
- Regular independent audits and public disclosure of license revenue and its uses to build public trust.

##### **2. Clear Definition of Public Service Deliverables**

- Tie the use of license funds to specific public service outputs (e.g., educational programs, rural broadcasting, and indigenous language content).
- Establish a performance-based funding system where disbursements are linked to GBC's delivery of measurable outcomes (coverage, quality, diversity, etc.).

##### **3. Independent Oversight Body**

- Mandate the National Media Commission to have oversight over the license fee revenues and ensure depoliticized, efficient fund allocation.

##### **4. Tiered and Equitable Payment Structure**

- Introduce **differentiated fees** based on income or usage — for example, lower or waived fees for vulnerable households, and full fees for high-consumption users (businesses, hotels).
- This improves fairness and collection compliance while ensuring broader public participation.

##### **5. Operational Efficiency within GBC**

- Require GBC to adopt **cost-saving and performance-enhancing reforms**, such as:
  - Staff restructuring and retraining,
  - Investment in modern digital broadcasting infrastructure,

- Internal audits and lean management practices.
- Tie part of the license funding to **efficiency benchmarks** (e.g., cost per program hour, audience reach, production timelines).

## 6. Public Engagement and Feedback

- Regularly engage the public to **report on service quality** and **assess satisfaction**, ensuring programming aligns with public needs.
- Allow citizen participation in program evaluation and license policy review every few years.

### 4.4 Devolution Policy for financial management of regional operations

The GBC has introduced a Devolution Policy in 2024 aimed at decentralizing authority and operational responsibility from its Head Office to regional and district stations. This move responds to outdated broadcasting structures, rising operational costs—especially electricity—and dwindling government support. The policy grants regional stations greater autonomy in decision-making, financial management, utility payments, and local programming, while reinforcing their accountability. Regional Advisory Committees will be established to oversee performance, and regional directors will be required to manage budgets, submit quarterly projections, and handle certain HR and disciplinary matters.

Under the new framework, regional stations will retain 100% of their revenue and be responsible for generating their own income, managing local expenses, and optimizing staff resources. However, expenditures outside approved items will still require Head Office authorization. While the Director-General remains the principal spending officer, regional directors must submit projected budgets and justify all other expenditures. Administrative changes include the restructuring of personnel engagement, promotions, leave approvals, and disciplinary actions to be more regionally controlled, while procurement and sensitive HR matters still fall under Head Office oversight.

To enhance sustainability and innovation, the policy promotes digital-first strategies, local content creation, and aggressive revenue generation through co-location, social media, and local business partnerships. Regional stations are also required to maintain branding and infrastructure standards. Performance benchmarks have been set—regions must meet at least 70% of annual targets or face leadership reassignment, while exceeding targets attracts financial rewards. Ultimately, the Devolution Policy seeks to empower regional teams to operate more like business units while continuing to fulfill GBC’s national public service broadcasting mandate.

## 5. GBC Governance and Regulation

### 5.1 GBC Board

The National Media Commission (NMC) of Ghana, is mandated to promote and safeguard the freedom and independence of the media, and one of its key responsibilities is appointing governing boards for state-owned media institutions, including the Ghana Broadcasting Corporation (GBC). The NMC appoints GBC board members in consultation with the President, as stipulated by Article 168 of the Constitution and Section 2(1)(e)

of the National Media Commission Act, 1993 (Act 449), through a constitutionally mandated process that ensures independence and public accountability of state-owned media.. These appointments typically occur biennially, with tenures renewable for a maximum of two (2) terms.

The biennial appointment cycle of the GBC board presents a key bottleneck by disrupting strategic continuity, weakening institutional memory. The short two-year term often limits the board's ability to implement and sustain long-term initiatives, while frequent turnover hinders the retention of organizational knowledge. This can be remedied by increasing the tenure of the Board to four (4) years.

## 5.2 GBC Management

The Ghana Broadcasting Corporation (GBC) operates under a hierarchical management structure designed to fulfill its mandate as the national public broadcaster.

The Executive Leadership comprises the Director-General at the apex of GBC's management, who oversees the corporation's overall strategic direction, and one Deputy Director-General, who assists the Director-General in managing the corporation's operations and implementing policies.

Supporting the executive leadership are twelve (12) Divisional Directors and ten (10) Regional Directors, each heading specific functional areas within GBC. These divisions encompass various aspects of broadcasting and corporate services, ensuring the smooth operation of the corporation.

In response to the evolving media landscape and the need for digital transformation, the Board of GBC initiated a significant organizational restructuring in 2024 through the introduction of a new Scheme of Service. This Scheme of Service was formulated in collaboration with the Public Service Commission, and aims to modernize the corporation's operations and better align with contemporary media consumption trends. Key changes included:

- **Merging Traditional Divisions:** The traditional divisions of Radio, Television, Engineering, and Technical Production were consolidated into three new divisions: News, Programmes, and Technology. This move was to foster a more integrated and efficient content production and dissemination process.
- **Upgrading Support Services:** The Legal Services, Corporate Affairs, and Audit divisions were elevated to directorate status, reflecting their strategic importance in the corporation's operations.
- **Human Resources Realignment:** The Human Resources division was restructured into a new Administration division, aiming to enhance administrative efficiency and staff management.

This restructuring reflects GBC's commitment to adapting to the digital age, ensuring that it remains a relevant and authoritative source of information in Ghana's media ecosystem.

## **6. Summary of Key Proposals**

1. **Enact a new legal framework** that:
  - Defines GBC's role in a liberalized, digital media environment.
  - Ensures editorial independence and accountability.
  - Aligns with modern regulatory and broadcasting standards.
2. **Adopt a hybrid funding model** combining:

- Public service media levy,
  - Limited government subvention,
  - Commercial revenue,
  - New digital revenue strategies.
3. **Reform governance structures** by:
- Extending Board tenure for strategic continuity,
  - Strengthening NMC oversight,
  - Streamlining internal management.
4. **Reposition GBC** as:
- A **multi-platform public service broadcaster**,
  - A **trusted national voice** in an age of misinformation,
  - A **sustainable and modern institution** in a competitive media market.