

# **BBC response to Ofcom's consultation on its Three-Year Media Literacy Strategy**

## **Executive summary**

- As Ofcom sets out, media literacy is “the ability to use, understand and create media and communications across multiple formats and services” – giving people the skills and confidence to interpret and navigate the media landscape. This has always been important, but is even more so as the media continues to change dramatically.
- For over a hundred years, the BBC has been a trusted source of information – and we remain the most trusted news brand in the UK in a landscape that sees a trust deficit.<sup>1</sup> We are guided by our mission and public purposes – with our purpose to provide impartial news and information to help people understand and engage with the world around them, and to support learning for people of all ages, at the heart of our media literacy offer. We recently set out our three priorities for the BBC of the future: the first was pursuing truth with no agenda, a role that nine in ten licence fee payers support, and which underpins our role in supporting media literacy.<sup>2</sup>
- We expect AI to fundamentally reshape audiences’ relationship with media providers. As in previous media eras, the BBC will be at the forefront of helping our audiences to use and understand the media ecosystem as this shift takes place. We believe that we can use GenAI in a responsible way that delivers value to audiences, and help audiences to navigate a new media world in a way no one else can.
- Supporting media literacy means:
  - **Providing trusted news and education content:** being an impartial and accurate source that is consumed and trusted by the majority, helping audiences to understand and engage with the world around them – including editorial coverage of key technology developments such as deepfakes and Generative AI (GenAI). We bring clarity to the chaos so that people can make their own judgements – for example, BBC Verify, which helps audiences to understand how we tell complex stories.
  - **Media literacy projects:** as part of our mission to support learning for people of all ages, the BBC has a number of initiatives targeted at giving specific groups particular skills – for example, our Other Side of the Story project aimed at teen learners.
  - **Shaping the wider information ecosystem:** we engage with the wider online information ecosystem, including academia and industry, to develop the norms and standards to help audiences to interpret the media – for example, the C2PA (Coalition for Content Provenance and Authenticity), which aims to address the twin problems of disinformation and declining trust by putting technical signals into content to show its provenance.

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<sup>1</sup> BBC Group [Annual Report and Accounts](#) 2022/23.

<sup>2</sup> BBC, [‘A BBC for the Future’](#) (2024).

- This response sets out key projects that the BBC is delivering to support media literacy, in addition to recommendations that are relevant to Ofcom’s Three-Year Media Literacy Strategy. We would be happy to discuss these further with Ofcom where helpful.

## **Introduction**

- The BBC welcomes the opportunity to respond to Ofcom’s Three-Year Media Literacy Strategy. Our response highlights the work we are already doing and areas where Ofcom could provide support. We believe that these recommendations align with Ofcom’s priority areas and objectives (Research, Evidence, and Evaluation, Engaging Platforms, and People & Partnerships).
- The BBC has had a public mission to inform, educate, and entertain for over 100 years – and in that time, our services have evolved. The advent of the internet created a powerful new means for us to fulfil our mission – one we have been at the forefront of embracing, from launching the BBC website in 1997 to blazing a trail with the creation of BBC iPlayer and bringing the concept of catch up and video-on-demand services to the UK public at large. We are continuing to evolve our digital offer in the news space – whether by launching a new network of over 70 multimedia investigative reporters across our local bases in England or exploring the potential of GenAI to translate content to make it available to more people.<sup>3</sup>
- The BBC is the most trusted news brand in the UK and the most trusted international news provider globally. Ofcom research shows that BBC News output across all platforms reaches 73% of all UK adults, with BBC One the most-used news source, fifteen percentage points higher than the next nearest provider.<sup>4</sup> Online, the BBC website/news app are seen by three quarters of users as high-quality (82%), accurate (78%), and trustworthy (74%) – roughly double the number of users who believe the news they consume via major social media platforms is high-quality, accurate, and trustworthy.<sup>5</sup>
- The BBC’s mission is “to act in the public interest, serving all audiences through the provision of impartial, high-quality, and distinctive output and services which inform, educate, and entertain”. Media literacy is highly relevant to this, and to our first two public purposes: to provide impartial news and information to help people understand and engage with the world around them, and to support learning for people of all ages.
- We agree with Ofcom’s statement in its consultation document, that “media literacy must be the responsibility of everyone”, including broadcasters. Well-funded public service broadcasting (PSB) goes hand in hand with democratic health, with citizens more likely to trust one another and less likely to think of authoritarian leadership as a good way to govern.
- This is a critical moment for media literacy. In 2024, elections are being held in countries representing half of the world’s population. At the same time, democracy and press freedom are under threat globally – with the latest Reporters Without Borders World Press Freedom Index showing that over half the world’s people live in places that are extremely dangerous

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<sup>3</sup> Ibid.

<sup>4</sup> Ofcom, [News Consumption in the UK: 2023](#).

<sup>5</sup> Ofcom, [News Consumption in the UK: 2022](#).

for press freedom.<sup>6</sup>

- The development of new technologies like Generative AI will also have an impact. While there are ways in which they could benefit news organisations, they could also exacerbate inaccurate news and dis- and misinformation. As has been widely documented, Gen AI is prone to “hallucinating” or generating false or misleading information. One recent example of an inaccurate AI-generated story was a false headline about Iran attacking Israel produced by X’s AI chatbot Grok, which was published on the site’s “Explore” page.<sup>7</sup>
- Against this backdrop, the BBC recently set out how we will deliver value for all.<sup>8</sup> One of our priorities under this strategy is to pursue truth with no agenda, bringing clarity to the chaos so that people can make their own judgements. As part of this, we are committed to our role in supporting media literacy across the UK and globally.

### **Comments on Ofcom’s Three-Year Media Literacy Strategy**

- The BBC welcomes Ofcom’s Three-Year Media Literacy Strategy. It’s crucial that we have a strong information ecosystem so that people can navigate content safely and confidently and continue to access media that they trust and value. We agree with Ofcom’s three pillars – Research, Evidence & Evaluation, Engaging Platforms, and People & Partnerships. We believe that our own work on media literacy aligns with this approach.
- We note that Ofcom sets out its role primarily as a “catalyst and convenor” in the context of this strategy. This is an important role. We believe that the recommendations that we have put forward below play into this and will ensure Ofcom supports and amplifies the work that the BBC is already doing in this space, including in partnership with others.

### **Relevant BBC initiatives**

#### **Trusted news**

##### ***BBC Verify***

- In 2023, BBC News launched BBC Verify – a highly specialised operation that brings together forensic journalists and expert talent from across the BBC, who fact-check, verify content, counter disinformation, analyse data, and – crucially – explain complex stories in the pursuit of truth. BBC Verify is underpinned by the principle that, “If you know how it’s made, you can trust what it says”.
- We have built a physical studio in the BBC’s London newsroom, from where BBC Verify correspondents explain the “how” behind our journalism – transparently sharing their evidence-gathering with audiences.
- BBC Verify is helping audiences to navigate complex news stories, including where online mis- and disinformation is involved. For example, one investigation explored how social media is being used to deny or minimise human suffering in the Israel-Gaza conflict, with false accusations that footage of civilian casualties feature actors rather than real people.

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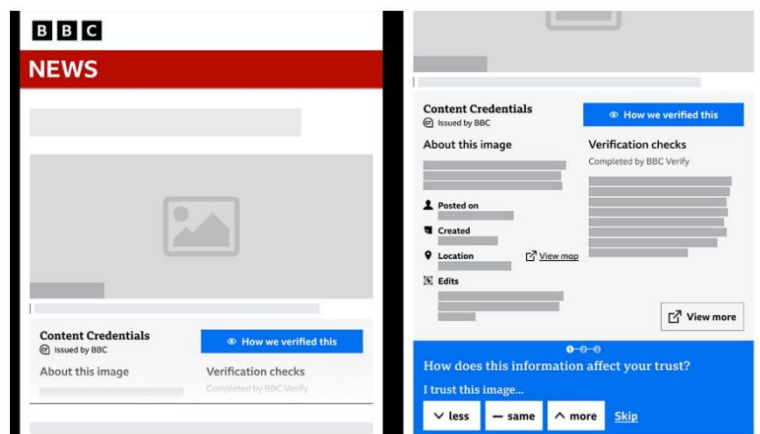
<sup>6</sup> Reporters Without Borders [World Press Freedom Index 2024](#).

<sup>7</sup> France24, ‘[Musk’s X publishes fake news headline on Iran-Israel generated by its own AI chatbot](#)’ (2024).

<sup>8</sup> A BBC For the Future.

## Content credentials

- Trusted, impartial news and the journalism that informs it is the bedrock of democracy – but trust in news is falling. In particular, people perceive news on platforms to be less trustworthy compared to the news media overall.<sup>9</sup>
- The BBC is a founding member of the C2PA (Coalition for Content Provenance and Authenticity) coalition, which aims to address the twin problems of disinformation and declining trust. Other members include Microsoft, Adobe, Google, the New York Times, and the Canadian Broadcasting Corporation.
- We have focussed on building and deploying technical signals for media provenance i.e. putting signals in content to show where it has come from and how it was made. In practice, that means that when we share a piece of content containing a signal, information about that content remains bonded with the piece of content as it travels around the internet. This work has been underpinned by user research helping us to establish a greater understanding of which provenance information is important to share, how people want to see that information, and the impact on trust in content when provenance is shown.
- BBC News recently used the C2PA standard to introduce a new “content credentials” feature, which confirms where an image or video has come from and how its authenticity has been verified.<sup>10</sup> Initially, content credentials will be available to audiences on certain BBC Verify content published on the BBC News site and app. We will work with external publishers and social media networks to ensure they are effectively displayed wherever news is consumed, to help people quickly and easily tell that something has genuinely come from the BBC and isn’t a misleading piece of faked media when they are online.



*How content credentials look on a piece of BBC content.*

- A self-selecting audience trial of 1,200 people suggested that 83% of respondents trust the media more after seeing our content credentials; 96% found content credentials useful; and the same number found them informative.<sup>11</sup>

<sup>9</sup> News Consumption Survey.

<sup>10</sup> BBC, '[New technology to show why images and video are genuine launches on BBC News](#)' (2024).

<sup>11</sup> BBC, '[Does provenance build trust?](#)' (2024).

- We believe that C2PA signals are an important tool to support trust in a world where it's increasingly easy to create convincing disinformation. Facebook and OpenAI have committed to using the free, open standard to publish content on their platforms.
- **Recommendation: As part of its “Engaging Platforms” workstream, Ofcom should refer to media provenance standards such as the C2PA in its regulatory guidance, to encourage uptake across the information ecosystem.**

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### Children and young people

#### *BBC Young Reporter Scheme*

- The BBC Young Reporter scheme continues to support 11-18 year olds across the UK by promoting news literacy and media skills. It engages with thousands of young people each year, in partnership with schools, colleges, and youth organisations, as part of the BBC's commitment to media literacy and supporting young people's understanding and interest in broadcasting and the creative industries.

#### *Other Side of the Story*

- The Other Side of the Story campaign is a collaboration between BBC Bitesize and BBC News, aiming to bring 11-16 year olds to the news through a mix of relatable talent and stories that engage their interest, on topics from AI to Ukraine to *Strictly*. Recently, the Electoral Commission has referenced an Other Side of the Story piece on how to tell if an image has been created by AI in its [“Advice for voters on how to engage with campaign material”](#).
- The campaign directly tackles misinformation and disinformation on social platforms, both through myth-busting “Fact or Fake” content and explainers of the key terms and issues, from “fake news” to “echo chambers”. There is also content to help teens with their own content making – from newsgathering through to making your own podcast.
- The campaign supports young people, teachers, and schools through both face-to-face engagement and the BBC Bitesize website. We have used learnings from this campaign to engage young audiences when it comes to BBC News content.

### The evolving digital landscape

#### *Relevant programming and content*

- The BBC takes time to cut through the noise and separate fact from fiction. We produce a range of programming and content to support people to spot false information online, for example:
  - The BBC Future blog – which combines evidence-based analysis and storytelling on a range of important issues – has produced a series called How Not to be Manipulated, publishing articles such as [“The one simple change that will improve your media diet in 2024”](#) and [“The ‘Sift’ strategy: A four-step method for spotting misinformation”](#).
  - BBC journalists have produced tips for audiences on [“How to spot ‘fake news’ online”](#) and [“Sorting fact from fiction: Useful tips and tools”](#) – as well as helpful

articles linked to specific news events, such as “[How to spot false posts from Ukraine](#)” and “[How you can stop bad information from going viral](#)” during the Covid-19 pandemic.

- We also support wider digital literacy work – for example, in partnership with Stop Scams UK and major UK organisations, the BBC’s 2023 Be Scam Safe week saw content and programming to help people to spot and avoid scams, including digitally-enabled scams such as QR code scams and online parcel delivery scams.<sup>12</sup>

### *Generative AI*

- Innovation has always been at the heart of the BBC – and Generative AI (GenAI) is no different. We believe GenAI could provide a significant opportunity for the BBC to deepen and amplify our mission, enabling us to deliver more value to our audiences. It also raises profound questions – from whether and how media companies should use GenAI tools to questions around copyright and IP.
- In order for the BBC to experiment with GenAI responsibly and effectively, it’s important for us to understand the views of audiences (as well as the sector more broadly). To help inform our work, in conjunction with Ipsos UK, we recently spoke to people from the UK, the US, and Australia to understand what they think about GenAI being used for news, audio, and video content.<sup>13</sup> We found that people think that GenAI heralds a permanent, significant, and disruptive step-change in technology and media – but they are nervous about its use. While there is more openness to the use of GenAI in audio content, people are more concerned about its use for video content, and use of GenAI in journalism is felt to be very high risk.
- GenAI could transform how people access information (including news) online. As Ofcom has noted, online intermediaries already play a significant role in the news ecosystem, including the curation, discovery, and monetisation of news.<sup>14</sup> GenAI could significantly change how information is created and provided to users, with potentially negative impacts on the information ecosystem, accurate news provision, and the business models of publishers. For example: news publisher content can be merged with other sources (trustworthy or non-trustworthy), taken out of context, or incorrectly summarised; GenAI services frequently do not adequately attribute content to news publishers or link back to owned and operated sites; GenAI services frequently do not give weight to high-quality news sources in a way consumers would expect, and it is unclear why certain sources have been prioritised; GenAI could exacerbate the existing challenges around misinformation and disinformation, with the potential for false stories, images, audio, or video to proliferate online (whether deliberately or not).
- **Recommendation: Ofcom take action where appropriate, so that GenAI supports key outcomes such as media literacy. For example, as part of its “Engaging Platforms” workstreams, Ofcom should support the development of best practice when it comes to displaying news publisher content (for example, on issues such as attribution, prominence, content integrity, links back to publisher content, and data back to publishers).**

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<sup>12</sup> [BBC Be Scam Safe](#).

<sup>13</sup> BBC, ‘[What do people think of Generative AI?](#)’ (2024).

<sup>14</sup> Ofcom, [Media plurality and online news discussion document](#) (2023).

## *Digital transition*

- We agree with Ofcom’s position that digital literacy is a cornerstone of media literacy – with a need to “continue building on digital inclusion infrastructure so that those new to technology can start and continue well.”
- With audiences moving from broadcast TV viewing to viewing via IP (Internet Protocol) at scale, the BBC believes that this transition must be a key part of the digital inclusion conversation going forward. IPTV could provide a unique incentive for people to get connected for the first time, opening the way to greater digital inclusion and accelerating the social and economic benefits of a fully digital Britain.
- The most common reason given by households for not taking up internet access is the belief that there is no “need to go online” (69%), followed by the belief that using the internet is “too complicated” (20%).<sup>15</sup> Research from BT and AbilityNet shows that a specific goal – such as “making doctor’s appointments, entertainment, applying for jobs or staying connected with family” helps digitally excluded users see the benefit of going online, compared to more abstract terms such as “digital skills”, which seem more daunting.<sup>16</sup>
- Given the importance of PSB in delivering trusted, accurate, and impartial news, the BBC has an important role to play in building media literacy by supporting new technology users to “start and continue well”. Through Everyone TV, the BBC and the other PSBs have launched a next-generation IPTV platform, Freely, to maintain the benefits of Freeview and Freesat for the internet TV age and allow British users to easily access all PSB channels and services for free, regardless of how they connect their TV device.
- **Recommendation: As part of its Future of TV Distribution work and closely linked to the third pillar of its Three-Year Media Literacy Strategy, Ofcom should:**
  - **Coordinate a collaborative process with infrastructure providers and their customers to identify future technical and financial tipping points for different TV distribution methods and the solutions required to manage their impact on audiences;**
  - **Work with the PSBs and ETV via the Future TV Taskforce to further understand which groups are less likely to embrace a transition from broadcast to IPTV and the role TV can play in driving digital inclusion;**
  - **Along with Government, engage with the recommendations of the Taskforce.**
- **Recommendation: Ofcom should ensure the Media Act is robustly implemented, to support people to find trusted public service TV content as ways of watching continue to evolve.**

## *Research into responsible innovation*

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<sup>15</sup> Ofcom, [Adults’ Media Use and Attitudes](#) (2023).

<sup>16</sup> BT, Digital inclusion: [New insights and finding a sustainable way forward](#) (2023).

- The BBC R&D Responsible Innovation team has been involved in several research partnerships and collaborations over the last 5 years looking at what members of the public understand and how they feel about data driven technologies. Several of these projects have looked at opportunities to develop digital technologies and experiences to better support people in their understanding of, and interactions with, digital platforms and technologies in ways that help them to make informed assessments and decisions (Living with Data, Designing for All, Bridging Responsible AI Divides, Digital Good Network, AI, Media and Democracy Lab). Through this work, we have considered different aspects of literacy as it connects to digital inclusion and participation.