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via email

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Dear Chris,

BBC Bitesize: A-level – Materiality Assessment

Thank you for sharing the BBC's materiality assessment regarding the proposal to expand BBC Bitesize to provide support for A-level learners and teachers in England, Wales and Northern Ireland. While the BBC is under no obligation to share its materiality assessments, we appreciate the opportunity to understand why the BBC considers that this is not a material change. I can confirm that Ofcom agrees that this change does not necessitate a Public Interest Test ("PIT"). This letter sets out our reasoning.

BBC's proposal

On 22 July 2026, we received a materiality assessment from the BBC proposing to expand BBC Bitesize to offer supplementary materials for some A-Level subjects to support learners and teachers in England, Wales and Northern Ireland. The BBC's stated goal is to produce a valuable educational tool, aligned with the A-Level curriculum, and easily accessible through BBC Bitesize. It proposes to use curated audio and video content from the BBC archive to provide curriculum-aligned supplementary learning materials.

The BBC plans to launch a series of curriculum-aligned pages initially across 10-12 subjects over three years, beginning with English literature in financial year 2026/27. The focus will primarily be on humanities and social sciences, where the BBC considers its archive to be strongest, and will be hosted within a dedicated section on BBC Bitesize (webpage and app).

BBC's assessment and stakeholder engagement

The BBC concluded that the proposal would not be a change that may have a significant impact on fair and effective competition and accordingly concluded it would not be a material change requiring the BBC to carry out a PIT. It relied primarily on a range of qualitative evidence, noting that a robust quantitative assessment was constrained by limited publicly available data, difficulties in isolating A-level usage, and challenges in defining the relevant market.

In support of its conclusion, the BBC argued that the online A-level education market is fragmented and competitive, that learners typically use multiple resources in parallel, and that any competitive impact would most plausibly be narrow and mainly limited to video-sharing platforms such as YouTube.

The BBC engaged with stakeholders as part of its assessment who raised concerns on potential impacts on commercial education publishers and emphasised the importance of the proposal remaining complementary to existing commercial offers. In response, the BBC made some changes to the initial rollout, including scaling back its plans for additional features such as quizzes and noting

that its science, technology, engineering and maths (STEM) provision would be limited – where stakeholders told the BBC they had most concern - given the nature of the BBC archive.

Our assessment

We have considered whether we agree with the BBC's assessment of its proposal. In reaching our view, we have reviewed the BBC's materiality assessment including its methodology, conducted our own desk research and considered additional information provided by the BBC in response to our questions.

Having considered the available evidence, we note that:

- **The proposal is limited in scope.** It would primarily involve the curation and organisation of existing BBC archive content into a curriculum-aligned offering, rather than the development of a comprehensive suite of new educational content.
- **The proposed offer is likely to be differentiated from many existing A-level resources.** The proposal focuses primarily on curriculum-aligned archival audio and video content in humanities and social science subjects,¹ whereas many existing A-level resources focus on text-based revision and assessment support, particularly in STEM subjects. As a result, some of the usage of the proposed BBC Bitesize offer may be additional to, rather than a substitute for, existing resources.
- **The closest competitors are likely to be curriculum aligned resources on global video sharing platforms,** but the impact is likely to be limited due to nature of BBC's offer (i.e. the use of the BBC archive to support deeper learning rather than producing comprehensive curriculum content).
- **In addition, the available evidence suggests that A-level students may use multiple educational resources alongside one another,** rather than relying on a single provider. To the extent that the proposed offer is a substitute, any increase in usage of the proposed BBC Bitesize offer is likely to draw from a broad range of providers rather than from any individual provider.

In conclusion, we agree with the BBC that the expansion of the BBC Bitesize offer to provide support for A-level learners and teachers is not a change that may have a significant adverse impact on fair and effective competition. As such, this is not a material change.

If the BBC seeks to make changes in the future to the features of the A-level resources it proposes to make available, we expect it to consider whether such changes constitute a material change.

Yours sincerely,



Ali-Abbas Ali

¹ Following stakeholder feedback, the BBC limited the initial rollout of the proposal and confirmed that it will not introduce additional features, such as quizzes, during the rollout phase. The BBC indicated that any future review of features would be informed by audience feedback and use of the service over time, or by significant developments in the wider market, and that engagement would take place beforehand.