

Recommendations submitted to the BBC consultation on Editorial Guidelines 19th December 2024.

Professor Julie Firmstone, School of Media and Communication, University of Leeds.

Professor John Steel, School of Humanities and Journalism, College of Arts, Humanities and Education, University of Derby.

Context of our submission

As detailed below, our recommendations are based on findings from our AHRC and ESRC funded research projects which have aimed to address the knowledge gap that exists between regulators, audiences, news publishers and journalists. Our recommendations are based on evidence collected from interviews with journalists and regulators in five European countries where trust in journalism is comparatively high (Denmark, Finland, The Netherlands, Norway, Switzerland) and on research engaging members of the UK public in discussions about ethics, standards, and the regulation of journalism.

Scope of the recommendations

Our recommendations are geared towards the contribution of the Editorial Guidelines to public understanding and knowledge about the ethics and standards that guide the journalistic production of news. The evidence presented here does not address the specific elements of the Editorial Guidelines, rather it emphasises how the BBC might enhance the impact of the Guidelines and public trust by making the role they play in upholding ethics and standards in the BBC's production of news more visible to the public. To enhance the work of the BBC, to bolster its broader public significance as a producer of news produced according to high ethical standards, and to garner greater levels of trust, we suggest that the BBC could do more to publicly frame the role of the Editorial Guidelines in safeguarding and maintaining the production of ethical journalism. By extension, these recommendations enable the BBC to play an important role by educating and improving the news literacy of UK audiences more broadly. With improved news literacy, audiences are better equipped to make informed judgements about the integrity and trustworthiness of all news and information sources. This is something that also applies to the wider digital realm where misinformation and disinformation is further eroding trust in news.

As such this submission addresses questions one and three of the consultation.

1) Are the draft Guidelines clear and straightforward? *Our recommendations relate to the communication of the Guidelines and the broader public purpose that increasing the visibility of the Guidelines could serve.*

2) Do they set out appropriate editorial standards for those making BBC programmes and content? *We have not addressed this question.*

3) Do they sufficiently reflect the changes in the media landscape since the last review in 2019? *Our recommendations are made in response to the continued deterioration of the relationship between the public and the news media, and the fundamental role of the BBC in that relationship. A number of problems are contributing to an erosion of trust that is further damaging to democracy. These relate to continued press malpractice over a decade on from the Leveson inquiry; changes in local news ecologies which have left many citizens and communities without a source of local news; a pervasive lack of public confidence in news publishers to produce information that represents their interests and enables them to be resilient against mal-information; and, in specific relation to the BBC, a number of damaging controversies. This review of the BBC's Editorial Guidelines is an opportunity for the BBC to reflect on how it communicates its contribution to the production of ethical journalism that audiences can trust.*

Summary of recommendations:

1. That the BBC acts to enhance public trust in the BBC's news and journalism, and in its governance structures and regulatory processes, by more prominently communicating the role of the Editorial Guidelines and the BBC Board in exemplifying and upholding an ethical journalism culture/the production of ethical journalism within the BBC.
2. That the BBC increases the visibility of the Editorial Guidelines, the scope of their contents and their purpose with the aim of increasing levels of news literacy among the public.
3. That the Editorial Guidelines are communicated in a way that promotes and articulates their dual purpose; as a set of guidelines and standards that the public can use to hold the BBC accountable, and as a set of guidelines for content producers.
4. That in each of the above, the BBC also clearly articulates the role of Ofcom in relation to the regulation of the BBC and the upholding of the Editorial Guidelines so as to improve public understanding of the nature and structure of its regulation.
5. That in addressing the above, the BBC involves the public in the deliberations around what serve as good communication ethics and engages with audiences to understand how best to communicate the BBC's role in upholding them. This might involve engaging with academics and researchers in addressing this issue.

Background evidence and details underpinning these recommendations:

These recommendations are based on evidence drawn from two RCUK funded research projects:

1) the '[Defining Freedom of the Press](#)' project (DFoP), examined press codes of ethics, journalism regulation and stakeholder perspectives on the role of journalism across Europe and the UK. The project examined codes of ethics in 13 countries and conducted interviews with journalists, regulators and NGOs in 5 countries that came top in the RSF Press Freedom rankings in 2018/19. Evidence is drawn from insights and analyses of data generated from countries considered to have a well-functioning, free and socially beneficial journalistic environment. The findings from this project inform our recommendation to increase public awareness of the BBC's Editorial Guidelines and the way that the BBC's news and journalism is regulated (see point 1 and 2 below).

2) The '[Engaging the public in regulating for ethical journalism](#)' project examines public perceptions and understanding of journalism and its regulation in the UK. The study seeks to understand how journalism might better meet public expectations and the role of news organisations and regulators in this dynamic. Evidence is based on a nationally representative survey of 3044 UK adults and 8 focus groups (44 adults) in 2022. We explored news literacy in relation to broader considerations of public opinion about the role of journalism, the news media and regulation in society. This included measures of trust in different types of news, exploring what roles and values audiences expect news to fulfil, asking how audiences evaluate the performance of news, exploring how they experience news and investigating perceptions and understandings of the regulation of ethics and standards in news. For details see two reports: Part One - the '[News Literacy](#)' report – presents the results of the survey and was produced in conjunction with the press regulator, Impress, who provided some of the funding for the project. Part Two – this report presents our analysis of the [focus groups](#) to identify six themes that contribute to a lack of trust among audiences in the wider news media environment and in the regulation of journalism. The findings from this project inform points 3-7 below.

The following findings inform our 5 recommendations:

1. A key finding from the DFoP project is that amongst countries ranked high in press freedom indices there are greater levels of public awareness of the role and powers of media regulation and regulators and enhanced awareness of the role and function of the regulator correlates to higher levels of trust and legitimacy in the system.
2. A second finding from the DFoP project is that in some countries journalists suggested that the relatively high public profile of media regulators tends to feed into greater levels of public trust, not only of journalists and journalism, but in the media regulatory process itself.
3. We found evidence of widespread low levels of news literacy. Over 50% of respondents do not feel they know very much about standards, regulation or how journalism works (Page 20, News Literacy report). News literacy differs from the broader concept of media literacy¹ in that it focuses specifically on understanding and awareness of how news journalism works, incorporates an understanding of the ethics and standards that guide the production of news, and importantly, includes an understanding of how the news media are regulated.
4. In relation to the problem of low trust in journalism, the data show a strong link between perceptions of low news literacy and low levels trust. Overall, 39% trust and 57% do not trust journalists (p. 15, plus see pp. 16-19 for trust in different types of news). Among people who feel they do not have much knowledge or understanding of how journalism works (low news literacy) levels of distrust are 5% higher at 62%. In contrast, when people feel they are knowledgeable about how journalism works they are 7% more likely to say they trust journalists, and 5% less likely to distrust journalists (this is based on analysis not included in the report). There is a similar relationship between low literacy and low trust when it comes to peoples' perception of their understanding and knowledge of how the news media and journalism are regulated – low knowledge equals low trust.
5. The survey data and focus groups indicate that people think they would trust the news more if they knew more about how it is produced (66%) and knew more about how it is regulated (70%) (p32).
6. The public are keen to improve their news literacy with 62% saying it is important that they understand how news is put together and 65% saying it is important that they understand how news is regulated (p22).
7. The focus groups suggest that trust in news is closely linked to the visibility and perceived effectiveness of regulation (the public would likely consider the BBC's Editorial Guidelines as an in-house form of self-regulation)². Overall, the survey and focus groups underscore the necessity for a more informed and involved public in journalism ethics and the regulation of news (p2).

We hope this is of interest and welcome further discussion on ways that our research and expertise could inform the use and communication of the Editorial Guidelines to enhance the BBC's relationship with the public.

Yours sincerely,

Professor Julie Firmstone and Professor John Steel.

¹ Ofcom now defines media literacy as “the ability to use, understand and create media and communications across multiple formats and services”.

² For instance, based on focus group responses relating to expectations of the visibility of guidelines and regulations, visibility could be increased by the guideline document being accompanied by an executive summary specifically designed to be read by members of the public and including clear instructions on how the public should lodge a complaint if they consider the codes to have been breached.

References:

Firmstone, J. Steel, J. Hodges-Long, H. and Saha, P. (2024) *Engaging the public in regulating for ethical journalism. Part Two: Focus Groups*.

<https://eprints.whiterose.ac.uk/216039/1/Engaging%20the%20public%20Part%202%20Focus%20Groups.pdf>

Firmstone, J., Steel, J., Conboy, Elliott-Harvey, C., M., Fox, C., & Mulderrig, J., Saunders, J., Wragg, P. (2022) "Trust and Ethics in Local Journalism. A Distinctive Orientation towards Responsible Journalism and Ethical Practices" in Lynch, Jake and Rice, Charis (eds.), *Responsible Journalism in Conflicted Societies: Trust and Public Service across New and Old Divides*, Routledge.

Gibson, H. Kirkconnell-Kawana, L. Proctor. E. Firmstone, J. and Steel, J. (2022) *News Literacy Report*, Impress. <https://www.impressorg.com/events-research-and-resources/research-reports/news-literacy-report/>