

Response to the Convergence Think Tank

“Convergence and the public: building a media literate society”

September 2008



About the Broadband Stakeholder Group (BSG)

The BSG is the UK government’s advisory group on broadband. It provides a neutral forum for organisations across the converging broadband value-chain to discuss and resolve key policy, regulatory and commercial issues, with the ultimate aim of helping to create a strong and competitive UK knowledge economy. Further information about the BSG can be found at: <http://www.broadbanduk.org/>

As a result of this remit, the BSG takes a keen interest in regulatory and policy developments that impact upon the market for content-based services and applications over broadband networks. In this area we work with a full range of stakeholders in the UK, including broadcasters, social networking sites, content providers, content aggregators and relevant third parties.

The BSG has experience in working with industry stakeholders in the development of good practice in response to the challenges of convergence. In particular, in partnership with industry and wider stakeholders, we facilitated and developed the “Good Practice Principles on Audiovisual Content Information” which were launched in February 2008. These principles demonstrate a commitment from signatories to promote media literacy by providing information on audiovisual content information that is easy for consumers to use and understand. The goal of this initiative is to empower consumers to make safe and informed choices about the content they and their families consume. Full details are available at: www.audiovisualcontent.org A copy of the Principles is also enclosed with this consultation response.

We draw from the experience of developing this good practice in responding to the questions put forward by the Convergence Think Tank and as such focus our comments on the questions put forward relating to “making informed choices.”

New risks and challenges for the public

1. What new or increased risks and challenges is convergence likely to bring for the public?
2. Are existing forms of regulation and self regulation appropriate to address those risks and challenges?
3. How should online businesses respond to consumer safety and protection issues?

As with most technological developments, convergence brings with it both challenges and benefits. Whilst convergence is allowing for the greater innovation of new services over a wider array of media platforms, giving more choice and convenience to the public, the challenge lies in how best to empower citizens to make informed and safe choices in this fast-changing media world.

This environment challenges the traditional regulatory structures and regimes for more traditional types of media. As media content is made more widely available, so that consumers can “pull” it at a time convenient to them, it would be counter-intuitive

to advocate a regulatory regime that undermined this flexibility that makes such services so attractive to consumers.

Yet making services accessible without providing clear and sufficient information about the nature of the available content and whether they might be unsuitable for children and young people, or may cause offense to some members of the public would be an inappropriate response to the challenges raised by convergence – and one that would be inconsistent with the brand reputation of responsible online businesses.

It is our view that education is crucial in order to enable the consumer to reap the benefits of convergence in a safe environment. Increased media literacy empowers the consumer. A more rigid regulatory response would not necessarily help the consumer to move effectively through a converged world, and would place an unnecessary burden on a thriving and innovative new media industry in the UK.

Maximising the opportunities offered by convergence for consumers and citizens

1. How do we use convergence to democratise creativity and opportunity across all sectors to maximise social and economic benefits to the UK?
2. What are the social and economic benefits of convergence for consumers and how can these be achieved?

The UK cannot afford to be complacent as there is a lot to lose from not taking the advantages up for grabs from convergence. The UK hi-tech sector generates approximately 9% of GDP, whilst the UK creative industries account for about 8.4% of GDP. Both are clearly an important part of UK growth, and indicate the likely clear economic benefits to the UK and its citizens, that convergence potentially offers.

Consumers like convergence. Convergence is ultimately being driven by consumers and their demand for new digital technologies and services. The UK consumer electronics market is the biggest in Europe and made up some 26% of total European sales in 2007. The enthusiasm demonstrated by UK consumers for these new services perhaps reflects the potential that convergence has to offer people new ways of thinking about the organisation of public and private time.

Convergence is also helping to create a world where there is a discernible shift in consumer/citizen behaviour away from consuming and viewing, towards using. In this model the user is engaged, actively contributing to and interacting with content and services, rather than passively consuming them. This is leading to a fundamental change in the way that people interact, consume, perceive value in and pay for services, including public services. All interested stakeholders need to harness the nature of convergence to ensure all consumers are able to access to social and economic benefits convergence offers.

The outcomes of convergence for consumers are as yet unknown. How convergence will develop in the future will be the result of a series of interactions between organisations providing new services and ever-shifting patterns of consumer behaviour. In such a changeable environment, organisations must be able to experiment with new services, business models and methods of delivery. Some may succeed, some may not, but if consumers are to harness the full benefits of convergence, a regulatory environment supportive of service innovation and experimentation will be required.

Similarly, for citizens to benefit it will be necessary for government and providers of public services to embrace convergence. There are examples of innovative use of convergence at the edges of public service delivery, but these need to be built on and brought into the mainstream. Convergence has huge potential, not just in improving public service delivery, but also in providing value for money, and harnessing this will be one of the key challenges for government as it seeks to keep pace with the transformation of citizen's everyday lives.

Making informed choices

1. How can we best equip consumers and citizen to make informed choices?
2. Are there groups with specific media literacy issues e.g. children, parents, business users, minority groups? If so, what roles should Government play (if any) addressing such issues?

As previously stated, we believe that consumers and citizens can be best equipped to make informed choices through education. Our work on the Good Practice Principles on Audiovisual Content Information (www.audiovisualcontent.org) evolved from the recognition that consumers, particularly parents, value clear information about the content they and their children can access, whether it is online, on a mobile phone or on television.

Research conducted by Ofcom on Programme Information (http://www.ofcom.org.uk/advice/media_literacy/medlitpub/medlitpubrssi/pirinvestigation/pirreport.pdf) demonstrates that consumers have different expectations for different services and platforms. Whilst research has shown that consumers want clear information about content, this does not correspond to a need for this information to be delivered in the same way across each and every platform.

In light of this, the Good Practice Principles on Audiovisual Content Information set out the underlying approach that content providers are taking so that consumers get the information they need, and in a way that makes sense to them across different platforms.

Building on existing good practice, the principles promote common sense, simplicity and transparency to ensure that consumers are empowered to make safe and informed choices about commercially produced content.

They relate to content that may be unsuitable for children and young people or which some members of the public may find offensive.

While the format of the information provided may vary from platform to platform, content providers are committed to ensuring that it:

- is easy to use and understand
- enables the user to make informed choices
- uses plain and consistent language
- is practical for the medium in which it is made available

Signatories to these principles include AOL, BBC, Bebo, BT Channel 4, Five, Google, ITV, Microsoft, Mobile Broadband Group (represents Orange, O2, 3, T-Mobile, Vodafone and Virgin Mobile), Teacher's TV, Virgin Media, Yahoo!, ATVOD (Association for Television on Demand), BBFC (British Board of Film Classification) and FOSI (Family Online Safety Institute).

Different providers are meeting these principles in a way suitable to the services they offer and the platforms involved. For example, the public service broadcasters in the UK (BBC, ITV, Channel Four and Five) use a 'G' for Guidance system, which denotes potentially offensive material with a 'G' icon together with a line of descriptive text (for example "contains strong language").

Members of the UK's Mobile Broadband Group (O2, Orange, T-Mobile, Virgin Mobile, Vodafone and 3) use classification and access controls based on robust age verification to prevent minors from being able to access inappropriate content on their mobile phones.

This difference in approach does not reveal a difference in objectives. Furthermore, we believe that this approach gives the necessary flexibility for services that are constantly evolving. These principles not only inform current content services, but those of the future as well. As such, whilst the nature of content itself will develop, the commitment to giving consumers information about this content that is easy to use and understand remains.

In her independent review, *Safer Children in a Digital World*, Dr Tanya Byron recognised these principles as an example of good practice. Furthermore, running through the review, it was clear that she both advocated industry driven development of voluntary codes of practice coupled by a full range of initiatives to improve the media literacy and understanding of internet safety issues by parents and children alike.

As such, we would strongly recommend that any future policy development around how to help people make informed choices places education and the role that industry can play in giving information to their consumers, at the heart of the approach.

The Good Practice Principles on Audiovisual Content Information are just one example of various initiatives led by industry players to ensure consumers can make safe and informed choices. For example, industry and government worked together to develop guidance for social networking, aimed at both parents and children, and the providers of social networking sites.

This guidance advises on how to be safe on these sites and what safety measures and advice should be given by the providers. On the latter point, it makes several recommendations relating to safety information, editorial responsibility (including appropriate advertising), registration, user profile and associated controls, how profiles can be searched, identity authentication and age verification, access to adult content, managing abuse and bullying, reporting concerns and relationships between service providers and law enforcement.

<http://police.homeoffice.gov.uk/publications/operational-policing/social-networking-guidance>

In light of the concerted effort being displayed by content providers themselves to tackle the challenges of convergence and to give consumers the tools and information they need to make informed choices, we believe that Government should focus its efforts on supporting these initiatives and giving these self regulatory initiatives space to thrive.

Media literacy is always one of those areas that continues to benefit from further research to reflect the changes taking place in the current media environment and how these affect different groups within society. We would support any resources

that Government, the regulator and others could direct to this important issue in order that industry can continue to give consumers the information they need to make safe and informed choices.

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