Best-Practice Principles for Media Literacy by Design

Summary of responses to our consultation

Statement

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1. Overview

Introduction

1.1 Following the call for input publication of our proposed Best-Practice Principles for Media Literacy by Design on 31 October 2023, we invited stakeholders to help us understand what good media literacy 'by design' looks like for social media, search, video-sharing, and gaming services. During the call for input, we sought views on how to improve these principles to make them more useful for different services.

1.2 We received 21 responses in total: 3 responses from platforms/platform representatives (Reddit, Google and a Roblox employee), 4 academic responses (Dr Elinor Carmi, Dr Gianfranco Polizzi & Professor Simeon Yates, Professor Adrienne Evans - representing also Dr Lindsay Balfour, Dr Sarah Kate Merry and Dr Marcus Maloney -, and Professor Jonathan Hardy – representing the Branded Content Governance Project), 9 responses from 'third sector' stakeholders (Media Smarts, South West Grid for Learning, Good Things Foundation, Parent Zone, Childnet, Internet Safe Kids Africa, Glitch, Antisemitism Policy Trust, 5 Rights Foundation), 2 responses from 'industry initiatives' (Digital Poverty Alliance, Internet Matters), 2 online network/forum responses (Online Safety Act Network and UK Safer Internet Centre / UKSIC) and 1 response from a Trust and Safety Vendor (Logically Facts).

Next Steps

1.3 Following the call for input, we have been considering the range of feedback received to iterate and improve the proposed Best-Practice Principles for Media Literacy by Design, of which the latest version is published alongside this document.

1.4 We will continue to engage with stakeholders and relevant parties as we progress with this work through encouraging the application and adoption of the principles.

2. Our overall approach

The typology

2.1 Most respondents agreed with the typology used to categorise 'on-platform interventions' (i.e., labels, overlays, prompts/pop-ups, notifications, and resources).[1] Stakeholders welcomed the approach chosen by the Making Sense of Media (MSOM) programme and its efforts to foster media literacy online. Similarly, most respondents considered the themes[2] used in the principles to be comprehensive.

2.2 While respondents showed overall agreement, some raised additional interventions they would like to see included. The Branded Content Governance (BCG) project expressed that guidance surrounding disclosure statements on sponsored and commercial content should be included. Professor Adrienne Evans (representing also Dr Lindsay Balfour, Dr Sarah Kate Merry and Dr Marcus Maloney) would have liked to see hardware and software included in the principles. Lastly, Parent Zone felt that the current principles focused on 'add-ons' rather than on the actual design of platforms.

2.3 It was raised that listed interventions mostly framed users as consumers rather than producers of content on platforms. This is why South West Grid for Learning (SWGfL) suggested that Ofcom include interventions targeted towards the producers of content on in-scope services.

2.4 A few respondents emphasised that on-platform interventions could not work in isolation from other initiatives (e.g., curriculum, in-person interventions, etc.). Google highlighted that any on-platform efforts needed to be complemented with off-platform initiatives.

2.5 Respondents from platforms expressed some concerns about the principles, in particular in relation to the tailoring of interventions and possible issues with privacy guidelines.

2.6 Reddit considered that media literacy by design efforts should focus on the core design of a service rather than being a top-down approach. This is why Reddit recommended that Ofcom '*have regard to structure and design [of a platform], in addition to layered interventions, in its assessment of best practices*'.[3]

2.7 Google viewed the suggestion to publish the impacts of an intervention as potentially '*burdensome*' and potentially creating a '*culture of risk-aversion*.'[4]

Specific gaps

2.8 Whilst most respondents agreed with our approach and typology, stakeholders shared some specific concerns regarding the proposed principles:

a) One respondent highlighted the risk of becoming protectionist rather than fostering critical thinking by focusing simply on changing users' behaviour.

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[1] Ofcom. (2023). Best-Practice Principles for on-platform interventions to promote media literacy, p.10

[2] Themes used are priority, transparency and accountability; user centric design and timely interventions; and monitoring and evaluating.

[3] See Reddit Response (ofcom.org.uk)

[4] See Google's Response (ofcom.org.uk)

b) Given the risk of disruption and user fatigue, some respondents highlighted that interventions could potentially result in cognitive overload and place the onus on users.
c) One respondent also raised concerns regarding the weighting of business considerations in platforms' decision-making process and feared that these would be prioritised over users' wellbeing.
d) One respondent expressed concern that, by focusing on on-platform interventions, there was a risk of over reliance on technologies to improve media literacy.
e) One respondent held that the interventions currently listed did not support users in understanding the online environment in which they operate (e.g., algorithms, etc.).
f) Other respondents considered that the principles alluded to a wide spectrum of online harms and suggested that Ofcom think of media literacy as it relates to specific harms. Professor Adrienne Evans, Dr Lindsay Balfour, Dr Sarah Kate Merry, and Dr Marcus Maloney therefore encouraged us to consider how media literacy tools could be deployed to protect women and girls online in the next iteration of the principles.
g) Respondents emphasised the importance of co-design and engaging with specialist organisations and experts to develop these harm focused principles.

KEY TAKEAWAYS

- Most respondents agreed with the typology used to frame the principles. Some respondents would like other elements to be included in the list of examples (e.g., an explicit focus on sponsored content, hardware, algorithm literacy, etc.).
- Concern was expressed that current interventions predominantly frame users as consumers rather than content producers.
- Both platform and non-platform respondents have stressed the importance of complementing online efforts with offline initiatives (e.g., in-person interventions, media literacy in schools, etc.).
- Platform respondents raised concerns about the principles and the potential effect on their businesses (e.g., burdensome process, risk of hindering innovation, etc.).
- Respondents have raised specific gaps that could be addressed in the next iteration of the principles.

Media Literacy by Design & the Online Safety Act

The role of regulation in the Media Literacy by Design project was highlighted by several non-platform respondents. In particular, these respondents encouraged continued and further explicit coordination between the Online Safety Act (OSA) and the Media Literacy by Design project.

2.9 The Digital Poverty Alliance called for online safety to be '*incorporated as a key principle in any strategy which prioritises media literacy*.'[5]

2.10 Others called for the inclusion of media literacy in statutory duties. The Online Safety Act Network asked whether Ofcom should be using this opportunity to work Media Literacy by Design into the OSA Codes of Practice.

[5] See Digital Poverty Alliance Response (ofcom.org.uk)

2.11 The OSA Network also considered that media literacy could be important to protect, in particular, '*children not just from illegal offences but from "legal" but harmful material.*'[6]

KEY TAKEAWAYS

- Some respondents called for further explicit join up between the Media Literacy by Design project and the OSA Codes of Practice.

[6] See Online Safety Act Network Response (ofcom.org.uk)

3. The rise and impact of future technologies

3.1 As technology and its risks change rapidly, many participants stressed that the principles should be flexible enough to remain relevant and address future challenges. They also noted that new technologies would alter the skills that users require to flourish online.

3.2 Overall, respondents considered the principles to be relatively future-proof and to stay relevant despite technological changes. Some, however, suggested that the new version of the principles could highlight the fact that the interventions listed were examples rather than exhaustive.

3.3 The role of Artificial Intelligence (AI) was mentioned by several respondents who considered it a potential game-changer, raising concerns that rapid advancements in technology risk widening the existing digital divide.[7] At the same time, changes caused by AI meant that media literacy will become an even more important component for users to flourish online.

3.4 Some participants saw AI as transformative for media literacy. The UK Safer Internet Centre (UKSIC) considered that AI tools could be leveraged to enhance existing media literacy tools, especially in regard to monitoring and evaluation.[8] Even in the face of new and unpredictable technological developments, the use of on-platform interventions was seen as valuable in helping users identify and better understand the content they see. The Antisemitism Policy Trust for example suggested using labels to make users aware that an image or a video is AI-generated as on example of an on-platform intervention that could support users to navigate these technologies.[9]

KEY TAKEAWAYS

- Respondents saw AI as highly relevant to the field of media literacy as it will likely impact the skills needed for one to flourish online.
- Some respondents considered AI as a potential opportunity to enhance existing media literacy interventions.
- Some respondents considered the principles future-proof but suggested that we emphasised the fact that the current list of interventions was not exhaustive.

[7] See Good Things Foundation Response (ofcom.org.uk)
[8] See UK Safer Internet Centre Response (ofcom.org.uk)
[9] See Antisemitism Policy Trust Response (ofcom.org.uk)

4. Take-up and the role of Ofcom

4.1 Respondents from all categories emphasised the need for Ofcom to think strategically about driving platforms' take-up of the principles.

4.2 Ofcom was seen as a potential bridge, connecting different actors by creating dedicated collaboration space for stakeholders to share insight and create action. It was suggested that Ofcom take a convening and influencing role to foster a culture of shared learnings between stakeholders (e.g., academia, third sector, industry, etc.). This could in turn help with Ofcom's development of guidance for the sector.

4.3 Whilst some acknowledged that smaller platforms might have more difficulties implementing the principles, several respondents considered that take-up from larger platforms could have a substantive impact and encouraged such firms to demonstrate leadership by implementing the principles.

4.4 Some respondents also referred to specific ways in which Ofcom could encourage platforms to use the principles in their work:

a) **Using positive and negative levers**: One respondent highlighted that Ofcom could leverage their reputation as the regulator by highlighting good practices and showing platforms potential Return on Investment (ROI) if they were to implement the principles. It was also suggested that Ofcom could expand its programme of events to showcase and recognise examples of successful initiatives in the UK. Similarly, it was suggested that negative levers in relation to reputational and financial risks could also be used for platforms who failed to implement the principles.

b) **Knowledge sharing:** Respondents also viewed knowledge sharing and transparency as key to the effective adoption and implementation of the principles. Further clarity and emphasis on platforms learning from each other could help in identifying what success looks like and support Ofcom's work if specific platforms are not seen to be implementing interventions in line with the principles.

c) **Developing a blueprint**: Ofcom could also detail specific steps platforms should be taking to demonstrate their commitment to the principles. In particular, one respondent suggested that Ofcom develops a playbook detailing the steps platforms can take to implement best-practices principles. It was also suggested that, as part of this blueprint, Ofcom should encourage measurement of 'success' to facilitate the assessment of platforms' work.

KEY TAKEAWAYS

- Ofcom to act as a convening and influencing force to foster a culture of shared learnings between stakeholders.
- Ofcom should highlight the positive aspects of implementing on-platform interventions to encourage platforms' take-up. Similarly, Ofcom should be clear about the risks for platforms not acting in line with the principles.
- Ofcom should provide further detail of what 'success' looks like and how platforms can commit to and implement the principles in their work.

5. Monitoring, evaluating and transparency

5.1 Several respondents highlighted the need for platforms to be more transparent about drivers of change, their decision-making process and the impact of interventions. In particular, the lack of publicly available data on media literacy interventions was considered a barrier to making progress on media literacy by design.

5.2 A number of respondents expressed that platforms should be more transparent about the need for interventions given that these create friction and risk disrupting users. For monitoring and evaluation (M&E) to be successful, several responses highlighted the need for a clear definition of what success and effectiveness meant and would look like from the outset. Some participants suggested that a successful intervention should reflect the three main themes structuring the principles (i.e., priority, transparency and accountability; user centric design and timely interventions & monitoring and evaluating). In terms of evaluation, it was highlighted that Ofcom should encourage platforms to use an interdisciplinary approach to make any assessment more meaningful. A consistent approach to M&E across platforms was also considered as a way to compensate for the lack of standardised metrics by creating a wider pool of comparable data.

5.3 Whilst some respondents called for a more thorough approach to M&E to help understand the longitudinal impact of interventions, other respondents raised concerns regarding ethical considerations. In particular, the fact that platforms are not clear about how they carry out M&E was seen as a potential risk for users. This is why academic respondents considered that platforms should be transparent about the ethical standards and process that they hold themselves.

The role of information sharing

5.4 Information sharing was also considered as a key component of a successful M&E strategy. Respondents' calls for improvement in this area included calls for evaluation of impact on specific user groups, calls for independent audits of interventions and calls for the publication of regular reports that are distilled and publicised in user friendly ways. In addition, it was suggested that platforms report results to Ofcom.

5.5 While this emphasis on the need for more robust and transparent M&E methods was supported by many non-platform respondents, platforms highlighted potential risks associated with enhanced information sharing. In particular, Google considered Ofcom to be setting the 'bar too high' as they were concerned that iterating and improving interventions could require a risk assessment for every change under the OSA. In addition, Google considered that the public sharing of information could potentially hinder innovation and business plans for platforms, and therefore called for a more light-touch approach.

KEY TAKEAWAYS

- Some respondents called for platforms to be more transparent surrounding the impact of on platform media literacy interventions as the lack of data limits shared learnings opportunity.

- Platforms were concerned about the potential risks for innovation and business plans if M&E results were to be widely shared.

6. Proactivity and the role of external stakeholders

6.1 Respondents called for a more proactive approach to media literacy on platform.

6.2 In the case of mis- and disinformation, respondents highlighted the value of on-platform media literacy interventions as potential components of prebunking[10] strategies to address this specific harm.

6.3 To help achieve this proactivity, the role of experts was emphasised. Some participants noted that platforms could benefit from engaging with external experts, auditors, and trusted voices (could include survivors, those with lived experience, etc.) to overcome any limitations associated with available online metrics.

KEY TAKEAWAYS

- Platforms could be more proactive in their approach to media literacy making it a strategic priority in and of itself.
- External experts, auditors and trusted voices can help platforms think about media literacy in a more proactive way where data may be limited or unreliable.

[10] The process of debunking lies, tactics or sources before they spread widely / gain influence (e.g. this could be in the form of a pre-roll video to educate people on manipulation tactics on a video sharing platform, a label encouraging caution on search results or an overlay to prompt critical thinking on social media).

7. Tailored interventions

7.1 Whilst some participants highlighted the need for universal design standards across platforms, many respondents called for further tailoring of on-platform interventions to address specific needs and for further engagement with relevant user groups.

7.2 Although many non-platform participants encouraged interventions to be tailored, some also noted that privacy and ethical concerns were associated with this specific practice. Similarly, Google shared concerns about personalised and intuitive interventions that could require 'substantial data collection' of users in the context of the OSA and the Information Commissioners Office's (ICO) Children Code.

KEY TAKEAWAYS

- Many respondents called for further tailoring of on-platform interventions to address specific needs, platforms raised concerns about the privacy implications of this.

A1. Definitions for in-scope interventions

Internal desk research carried out by the MSOM team between February and April of 2022 found five existing types of on-platform interventions across 23 online social media, search, and gaming platforms:

- **Labels**: applied to individual pieces of content, search results and accounts; provide users with additional information as they view the content, search result or account; may signpost / link to additional resources with further information or support.
- **Overlays**: applied to individual pieces of content and search results; provide users with additional information before they view the content or search result; may set out viewing choices explicitly; may signpost / link to additional resources with further information or support.
- **Prompts / pop-ups**: served to users based on actual or potential actions / behaviours or platform changes; provide users with additional information about their actions / behaviours or platform changes; may set out action / behaviour choices explicitly; may signpost / link to additional resources with further information or support.
- **Notifications**: served to users based on actual actions / behaviours or platform changes via their notification feed; provide users with additional information about actions / behaviours or platform changes; may signpost / link to additional resources with further information or support.
- **Resources**: video, image or text-based resources that are served to users via their content feeds; provide users with additional information to inform future actions / behaviours; may signpost / link to additional resources with further information or support.
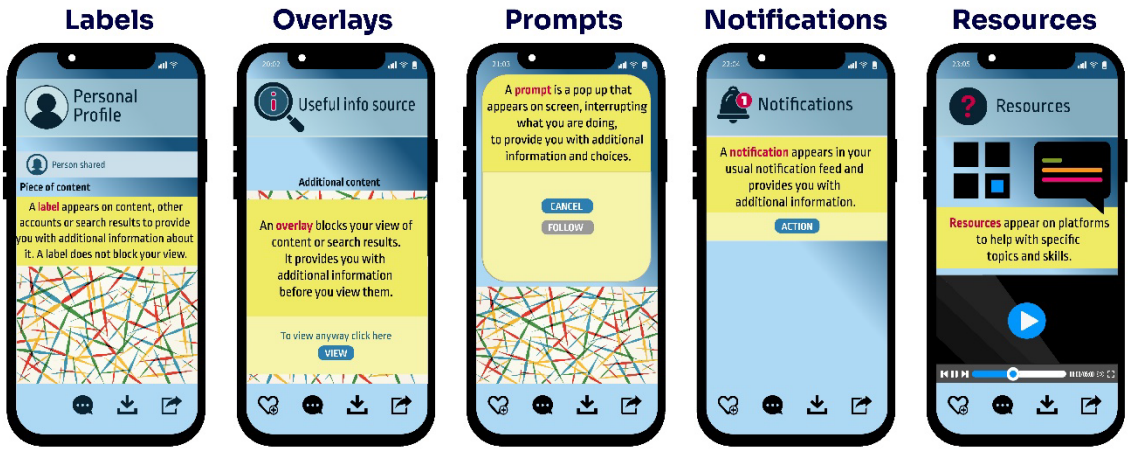
Figure 1- Illustrative mock-ups of in-scope interventions