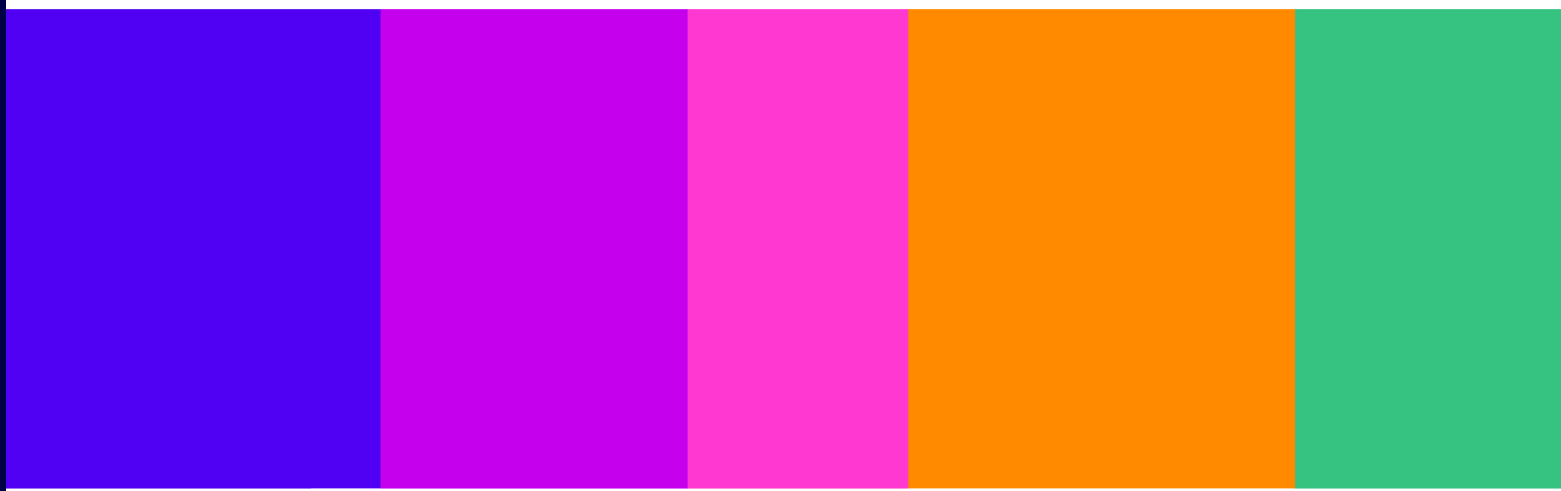# Media literacy by design

Best practice principles for on-platform interventions to promote media literacy

Call for input

Published 31 October 2023
Closing date for responses: 18 December 2023

Contents

1. Introduction

This document is a call for input inviting stakeholders to help us expand our understanding of what good media literacy 'by design' should look like for social media, search, video-sharing and gaming services.

Ofcom defines media literacy as "the ability to use, understand and create media and communications in a variety of contexts". Our media literacy programme (Making Sense of Media) has a dual focus on people and platforms.

In this financial year we have commissioned a range of organisations to conduct interventions with people from underserved communities. In addition, we are working in communities of significant financial deprivation exploring place-based solutions and we have commissioned training for 1,000 professionals to support children and young people. All this work is of great value and genuinely transformative for those who encounter it. It is also complex and costly which means it can only ever reach a small proportion of the population.

However, our work with platforms/online services, has the potential to promote media literacy to the millions of people that use social media, search, video-sharing and gaming service, or what we refer to as 'online services', to enhance and enrich their lives on a daily basis.

What happens on-platform at point of use must be part of the solution to the media literacy challenges in the UK. This does require online services to act on-platform and in the moment to prompt critical thinking, to challenge unwelcome behaviour and to enhance the user experience. This will differ in look and feel across different types of services, in-line with brand guidelines and tone.

Despite the differences, there are some best-practice principles that can underpin this thinking, drive improvements and promote users' media literacy.

Media literacy and online safety

Under the Communications Act 2003 (the Act), Ofcom has a duty to both promote and to carry out research into media literacy.[1] Ofcom also regulates Video Sharing Platforms (VSPs) and recently became the UK's online safety regulator following the Online Safety Act 2023 becoming law. The Online Safety Act (OSA) will make social media, gaming, pornography, sharing and search services legally responsible for keeping children and adults safe online.

The VSP regime requires providers to take appropriate measures to protect the public from "relevant harmful material" and under-18s from "restricted material". While this document is separate from VSP and online safety duties, we see this work that forms part of Ofcom's media literacy duties as complementary to both regimes.

In addition, this document is in line with the additional media literacy duties that will be assigned to Ofcom in the OSA.[2] Ofcom's media literacy duties will include drawing up, and from time to time reviewing and revising, "a statement recommending ways in which others, including providers of

---

[1] See section 11 of the Act.
[2] Clause 166 of the Online Safety Bill amends the media literacy duties set out in section 11 of the Act.

regulated services, might develop, pursue and evaluate activities or initiatives relevant to media literacy in relation to regulated services."[3]

This 'call for input' publication will gather relevant information and contribute to the preparation of Ofcom's media literacy statement once the amendments to the duties take effect. This work plays an important role in fulfilling our responsibility to encourage the development and use of technologies and systems to improve media literacy amongst UK users.

While this report and our other media literacy work will make an important contribution to our implementation of the changes to our media literacy duties introduced by the OSA, it should not be interpreted as a statement of our policy on other guidance or our codes of practice under the OSA or prejudge any further work to develop policy in relation to that Act.

Call for input on Best Practice Principles for On-Platform Interventions to Promote Media Literacy

This call for input invites stakeholders to help us shape the Best Practice Principles for On-Platform Interventions to Promote Media Literacy. We have set out, in section 3 of this document, specific areas on which we would welcome stakeholders' views. This call for input will help us improve our understanding of stakeholders' views on what good media literacy by design should look like. We will use this information to help inform our approach for the next iteration of the principles in spring 2024.

People and online services

Over the last quarter of 2022 and most of 2023, Ofcom convened an expert working group to help us understand what was already happening to promote media literacy on a selection of online services and the thinking behind it. We are indebted to the members of the Establish External Working Group for their time and expertise. In addition, we held a series of longer conversations with representatives from Google search, Meta, TikTok, Twitter (now X) and Roblox. Engagement from online services was voluntary. We are grateful to the experts from those organisations who took the time to meet with us and explain not just what they do, but how they make decisions about media literacy interventions.

On-platform interventions are used by services to intervene in their users' experience to provide additional context or information to support them to make informed decisions, reflect on their behaviour and/or develop resilience. Current examples of on-platform interventions include labels, overlays, pop-ups, notifications and resources.

What we heard

The common themes we heard from the online services included:

- Interventions are often initiated in response to issues being raised externally, for example international events such as pandemics and wars, or when a trusted advocacy group highlights an issue and suggests an on-platform solution.

---

[3] New section 11(1D) of the Act, as inserted by clause 166 of the Online Safety Bill.

- The development and deployment of interventions are cross-functional collaborations involving a range of experts within the organisation.

- While online services' interventions draw on media literacy as a behavioural lever, media literacy is seldom framed as a driver of interventions – as mentioned above, they are often focused on harm reduction/mitigation and/or created in response to an issue identified by an external organisation or the identification of a user need. While media literacy to mitigate specific harms is important, platforms have an important role to play in increasing internet users' media literacy so that they have the skills, knowledge and understanding to make full use of the opportunities presented by these services.

- Impact evaluation is not conducted routinely – making it difficult to understand the impact of interventions. For some interventions metrics may be developed but this is by no means a key part of the deployment of these interventions. Despite the lack of available information on the impact of interventions, they are often iterated by services over time to retain their salience and there was appetite for benchmarking of some metrics.

- Platform representatives regard their platform as different to every other platform, so comparisons were more likely to be challenged than embraced. However, there are common principles for how all services can approach media literacy by design with best practice in mind while respecting the differences between the services. Other challenges in evaluating on-platform interventions include the speed and frequency in which they are introduced/removed within complex ecosystems.

In addition to our conversations with online services and working group engagement, Ofcom also commissioned YouGov to explore user experiences of online interventions. The agency conducted an initial sampling survey amongst 1,072 internet users aged 13-84 in late 2022, followed by detailed qualitative research amongst teenagers and adults conducted in spring 2023. Amongst the findings we noted that both adults and children found the interventions broadly useful for highlighting sensitive or upsetting content. Participants felt there was clear value in these interventions to prevent the instant viewing of harmful content and to make users aware of harmful behaviour. However, utility changed by age, and across all age groups repeated exposure became both irritating and counterproductive over time. Indeed, they wanted interventions to be used as a warning system and a tool to educate users – especially to inform them about why an intervention was deemed necessary.

Insights from the conversations with platforms and the YouGov research were very valuable in informing this work. What follows is our view on best practice principles for media literacy interventions. Crucially, we're not recommending more interventions for the sake of it; we recognise the importance of the user journey, and our proposed recommendations are anchored in what's happening on-platform, in the moment and are informed by heuristic design principles (rules of thumb or principles for design, based on empirical and research-informed best practices) and consistent with the OSA. Our thinking has been informed by the values that underpin good policy making; our aim was to be outcomes focused, evidence based, proportionate, accountable and transparent. Through our conversations with platforms and wider research we identified gaps surrounding the evaluation of media literacy interventions. We gathered and shared evidence on the effectiveness of media literacy interventions and clear/transparent strategies or means of prioritising media literacy as a goal in and of itself. These proposed principles were therefore developed to provide guidance for platforms on how they may address the identified gaps. We would be keen to hear from others whether we have achieved this.

We ask for comments on this, and on the principles below, by emailing makingsenseofmedia@ofcom.org.uk by 23:59 Monday, 18 December 2023.

2. Principles

Media literacy is about peoples' knowledge, understanding and skills. Together, these play an important role in helping internet users to engage with online services critically, safely and effectively, and thereby maximise the benefits and minimise the risks associated with being online.

The online services that form part of the fabric of our lives have an important role to play in supporting their users' media literacy. In addition to the programmes they fund and the safety centres they promote, online services are by definition uniquely placed to improve users' media literacy in the moment. This can only happen if services prioritise users' media literacy. These principles set out best practice for online services to support their users in this way.

In line with design heuristics, these principles encourage platforms to anticipate user needs, support user choice, allow users to rectify mistakes (thereby providing learning opportunities) and provide feedback to users.

Application of these principles

These principles will be relevant to online services of all sizes. What we are recommending aligns with what will be expected of regulated services under the OSA.

These principles are neither exhaustive nor legally binding but rather are intended to encourage best practice that can promote online services user's media literacy.

Priority, transparency and accountability

A transparent strategy that prioritises media literacy is essential in being held to account in supporting users to improve their skills, knowledge and understanding. Further, the publication of information regarding media literacy interventions will allow better assessment and dissemination of findings.

1. Online services create a media literacy by design policy to promote critical and informed use of their product. Media literacy is a strategic priority in and of itself, with platforms publishing actions and aims with regards to media literacy. Services consider media literacy as part of their Key Performance Indicators (KPIs) or Objectives and Key Results (OKRs) and iterate them based on new findings and evidence.

2. Online services regularly publish the impact that media literacy interventions have had, and findings are proactively shared with the widest community possible.

3. Online services are transparent about their stakeholder engagement that informs their media literacy priorities and how other expert voices are prioritised.

User centric design and timely interventions

The design process is inherently iterative and should put user needs at the centre of every stage of this process, to create highly usable and inclusive products. Creating products that are accessible to all users requires an in-depth understanding of the various demographics engaging with the platform in reference.

4. Best practice media literacy by design is inclusive, recognising that any design decision will affect the experiences of users differently, and therefore prioritises serving the broadest range of needs to expand access, engaging a diverse range of users in the research stage of development. The context in which people make decisions and the psychological factors that underpin decision making are considered. Specific/tailored support for those with disabilities or accessibility needs is provided.

5. Products are intuitive to use, using mental models to align with user expectations and aid understanding in how to engage with the platform. Feedback to users is designed to aid understanding and increase literacy surrounding risk and behaviour that can prevent harm as well as around how to correct mistakes. The optimal time at which to provide users with information relevant to the action they want to take is considered.

6. Best practice media literacy by design is based on research, evidence and engagement with the relevant users, communities and experts.

7. Online services invite external and independent scrutiny to minimise potential bias in the design of on-platform media literacy interventions.

8. Interventions and policies to promote media literacy are designed and iterated by incorporating findings from product evaluation against media literacy metrics. These findings may come from evaluation conducted by the service and/or comparable services/sites.

Monitoring and evaluating

Monitoring and evaluating the effects of a media literacy intervention through empirical investigations is essential in assessing the effectiveness of an intervention and that the intervention works as intended. It allows online services to identify any unintended consequences and refine/improve products if needed in future iterations.

Robust testing and evaluation methods are part of the solution in improving the dissemination of knowledge surrounding media literacy interventions, and therefore the creation of best practice examples.

9. Best practice media literacy by design details and publishes how effectiveness (e.g. critical and informed use of a product) will be measured and judged at the outset, paying particular attention to the effects of any intervention on behaviour change.

10. Interventions are monitored for effectiveness and impact and then iterated to maintain and improve how effective they are at supporting users, as well as mitigating potential unintended consequences.

   - The largest services may be able to use experimentation methods such as A/B testing that, if performed adequately, can allow for causal relationships to be observed. However, we recognise these evaluation techniques may not be feasible for platforms of all sizes. The observation and self-reporting techniques (ideally monitoring and evaluating against anticipated outcomes) that may be more suited to the resource constraints of smaller services are still very valuable in increasing understanding of what does and doesn't work. The effects of some interventions may require observation in the longer term using more generalised reporting metrics.

11. Online services share the findings of their experimentation and observation on the effectiveness of media literacy interventions as part of showing leadership and initiative in this area.

12. Where possible, the effectiveness of well-designed media literacy interventions should be assessed using measurements that can be broadly benchmarked against other comparable services or online experiences.

A1. Definitions for in-scope interventions

Internal desk research carried out by Ofcom 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
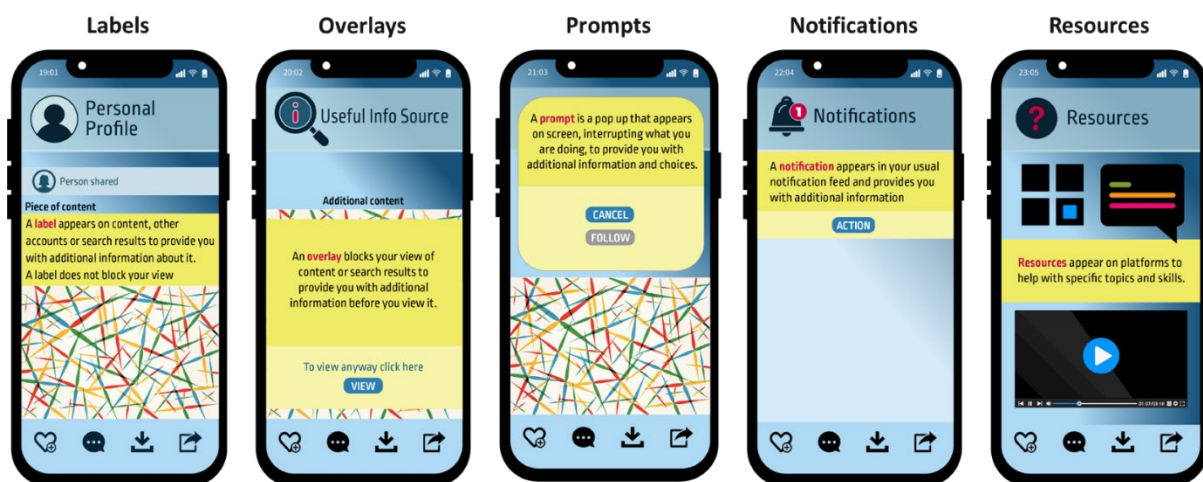
A2. Responding to this consultation

How to respond

A2.1   Ofcom would like to receive views and comments on the issues raised in this document, by 23:59 on 18 December 2023

A2.2   You can download a response form from https://www.ofcom.org.uk/consultations-and-statements/category-2/call-for-input-media-literacy-by-design. You can return this by email or post to the address provided in the response form.

A2.3   If your response is a large file, or has supporting charts, tables or other data, please email it to makingsenseofmedia@ofcom.org.uk, as an attachment in Microsoft Word format, together with the cover sheet. This email address is for this consultation only and will not be valid after 23:59 on 18 December 2023.

A2.4   Responses may alternatively be posted to the address below, marked with the title of the consultation:

Claire Levens
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA

A2.5   We welcome responses in formats other than print, for example an audio recording or a British Sign Language video. To respond in BSL:

- send us a recording of you signing your response. This should be no longer than 5 minutes. Suitable file formats are DVDs, wmv or QuickTime files; or
- upload a video of you signing your response directly to YouTube (or another hosting site) and send us the link.

A2.6   We will publish a transcript of any audio or video responses we receive (unless your response is confidential)

A2.7   We do not need a paper copy of your response as well as an electronic version. We will acknowledge receipt of a response submitted to us by email.

A2.8   You do not have to answer all the questions in the consultation if you do not have a view; a short response on just one point is fine. We also welcome joint responses.

A2.9   It would be helpful if your response could include direct answers to the questions asked in the consultation document. The questions are listed at Annex 5. It would also help if you could explain why you hold your views, and what you think the effect of Ofcom's proposals would be.

A2.10   If you want to discuss the issues and questions raised in this consultation, please contact makingsenseofmedia@ofcom.org.uk.

Confidentiality

A2.11   Consultations are more effective if we publish the responses before the consultation period closes. This can help people and organisations with limited resources or familiarity with the issues to respond in a more informed way. So, in the interests of transparency and good regulatory practice, and because we believe it is important that everyone who is interested in an issue can see other respondents' views, we usually publish responses on the Ofcom website at regular intervals during and after the consultation period.

A2.12   If you think your response should be kept confidential, please specify which part(s) this applies to and explain why. Please send any confidential sections as a separate annex. If you want your name, address, other contact details or job title to remain confidential, please provide them only in the cover sheet, so that we don't have to edit your response.

A2.13   If someone asks us to keep part or all of a response confidential, we will treat this request seriously and try to respect it. But sometimes we will need to publish all responses, including those that are marked as confidential, in order to meet legal obligations.

A2.14   To fulfil our pre-disclosure duty, we may share a copy of your response with the relevant government department before we publish it on our website.

A2.15   Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Ofcom's intellectual property rights are explained further in our Terms of Use.

Next steps

A2.16   Following this consultation period, Ofcom plans to publish a statement in Spring 2024.

A2.17   If you wish, you can register to receive mail updates alerting you to new Ofcom publications.

Ofcom's consultation processes

A2.18   Ofcom aims to make responding to a consultation as easy as possible. For more information, please see our consultation principles in Annex 3.

A2.19   If you have any comments or suggestions on how we manage our consultations, please email us at consult@ofcom.org.uk. We particularly welcome ideas on how Ofcom could more effectively seek the views of groups or individuals, such as small businesses and residential consumers, who are less likely to give their opinions through a formal consultation.

A2.20   If you would like to discuss these issues, or Ofcom's consultation processes more generally, please contact the corporation secretary:

A2.21   Corporation Secretary
Ofcom
Riverside House
2a Southwark Bridge Road
London SE1 9HA
Email: corporationsecretary@ofcom.org.uk

A3. Ofcom's consultation principles

Ofcom has seven principles that it follows for every public written consultation:

Before the consultation

A3.1   Wherever possible, we will hold informal talks with people and organisations before announcing a big consultation, to find out whether we are thinking along the right lines. If we do not have enough time to do this, we will hold an open meeting to explain our proposals, shortly after announcing the consultation.

During the consultation

A3.2   We will be clear about whom we are consulting, why, on what questions and for how long.

A3.3   We will make the consultation document as short and simple as possible, with an overview of no more than two pages. We will try to make it as easy as possible for people to give us a written response.

A3.4   We will consult for up to ten weeks, depending on the potential impact of our proposals.

A3.5   A person within Ofcom will be in charge of making sure we follow our own guidelines and aim to reach the largest possible number of people and organisations who may be interested in the outcome of our decisions. Ofcom's Consultation Champion is the main person to contact if you have views on the way we run our consultations.

A3.6   If we are not able to follow any of these seven principles, we will explain why.

After the consultation

A3.7   We think it is important that everyone who is interested in an issue can see other people's views, so we usually publish the responses on our website at regular intervals during and after the consultation period. After the consultation we will make our decisions and publish a statement explaining what we are going to do, and why, showing how respondents' views helped to shape these decisions.

A4. Consultation coversheet

Basic details

Consultation title:

To (Ofcom contact):

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

Confidentiality

Please tick below what part of your response you consider is confidential, giving your reasons why

- Nothing ☐
- Name/contact details/job title ☐
- Whole response ☐
- Organisation ☐
- Part of the response ☐

If you selected 'Part of the response', please specify which parts:

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

Yes ☐   No ☐

Declaration

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom aims to publish responses at regular intervals during and after the consultation period. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name   Signed (if hard copy)

A5. Consultation questions

A5.1   We invite responses to the following questions we have asked in this CFI:

Question 1: We include labels, overlays, pop-ups, notifications, and resources as examples of on-platform interventions (additional information regarding this typology can be found in the Annex on page 3).

(a)   Do you agree with this categorisation of on-platform interventions?

(b)   If not, please explain.

Question 2: Do you have any feedback on the summary of themes we identified from online services? Are there any omissions or other items you think important to add?

Question 3: Are we missing anything with the three headings used to structure the best practice principles for media literacy by design?

Question 4: Which aspects of the proposed best practice principles for media literacy by design work well, and why? Which aspects don't work so well, and why? Do you have any comments on the specific principles (please specify if providing feedback on individual principles)?

Question 5: Do you have any further guidance / feedback to offer on how platforms can enact best practice media literacy by design?

Question 6: Can you submit any case studies or examples of different services enacting any of these best principles for media literacy by design? Can you provide any other examples of best practice media literacy by design that may not be covered by this document?

Question 7: How do you expect in-scope services to demonstrate that they have adopted the principles? What would this look like?

Question 8: What more can be done to encourage services to promote media literacy by design?

Question 9: How do you envisage the proposed services in scope of this work, and in particular their design elements as they relate to the promotion of media literacy, changing and evolving within the next 5-10 years?

The overview section in this document is a simplified high-level summary only. The principles we are consulting on and our reasoning are set out in the full document.