Media Literacy by Design
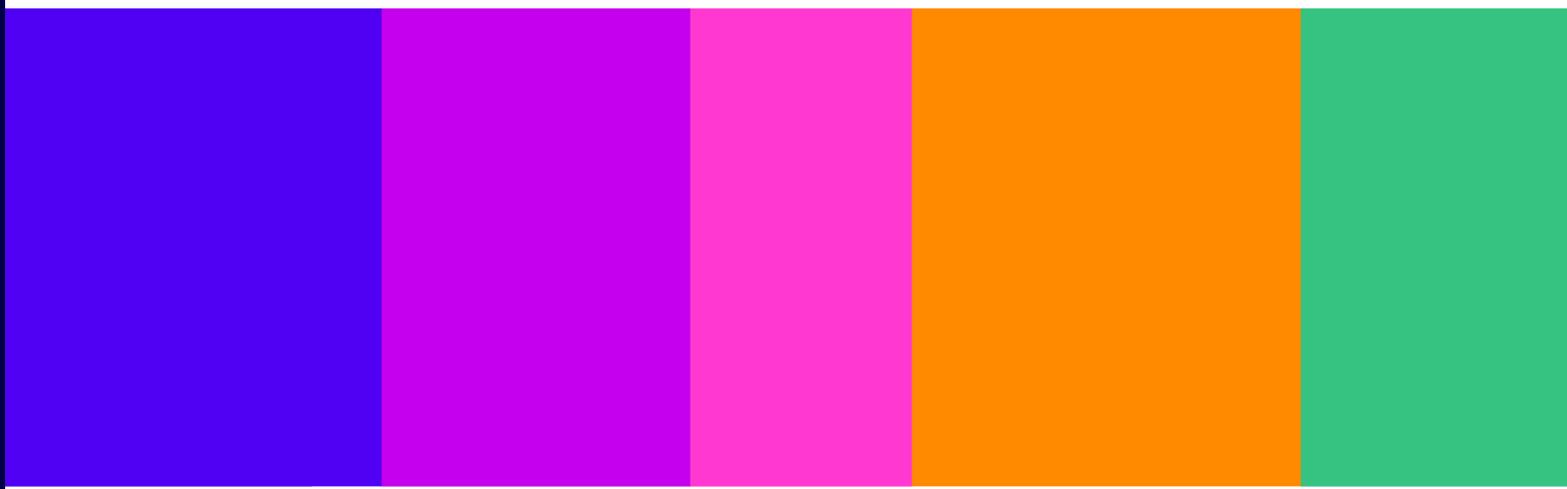
Best-Practice Principles for On-Platform Interventions to Promote Media Literacy

Welsh version available

New Principles

Published 19 April 2024

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1. Introduction

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 (MSOM), has a dual focus on people and platforms. This document focuses on on-platform interventions to promote media literacy, considers how regulated services' approach media literacy on-platform, and sets out a non-exhaustive list of best-practice principles for how social media, search, video-sharing, and gaming services can promote media literacy by design. MSOM's work with platforms – or online services aims to establish what works well, and what does not, online.

Media literacy and online safety

Ofcom has a statutory duty to promote media literacy and to carry out research into media literacy.[1] Our work on Best-practice Principles for Media Literacy by Design was initiated under these duties as set out in section 11 of the Communications Act 2003. Ofcom is also the regulator for video-sharing platforms (VSPs) and since November 2020, VSPs established in the UK must comply with rules protecting users from harmful videos.[2] Ofcom recently became the UK's online safety regulator following the Online Safety Act 2023 (the Act) becoming law. Ofcom's media literacy work will make an important contribution to the implementation of the changes under the Act, in particular the changes to Ofcom's media literacy duties introduced by the Act. However, this work 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. Whilst there are close links between the policy areas of media literacy and online safety, they are distinct. Our media literacy work, which includes these principles, is broader in scope than online safety, in terms of both the content and services to which it applies. In addition, as a voluntary initiative we have more discretion in the recommendations we make here than in the online safety codes. The online safety codes are dictated by requirements specified by the Act, and must set out proportionate, detailed steps that all in scope services can take to comply with their legal obligations. Our media literacy work goes beyond requirements specified in the Act to consider what more online services can do to support people to use, understand and create online media and communications in a variety of contexts.

Background

Ofcom convened an expert working group from October 2022 to July 2023 to help us understand what was already happening to promote media literacy on a selection of online services, and the thinking behind that activity. We are indebted to the members of that 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 and the degree of engagement varied on a case-by-case basis between services. We are grateful to

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[1] Communications Act 2003. (2003). Legislation.gov.uk. Retrieved January 12, 2024, from https://www.legislation.gov.uk/ukpga/2003/21/contents
[2] Ofcom. (n.d.). Video-sharing platform (VSP) regulation. Ofcom. Retrieved January 12, 2024, from https://www.ofcom.org.uk/online-safety/information-for-industry/vsp-regulation

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.

We learned that 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, but are not limited to, labels, overlays, pop-ups, notifications, and resources.

Such interventions can help users understand how the content they see online is curated by different stakeholders (e.g., platforms, advertisers, influencers, etc.). Whilst media literacy by design is about providing adequate support to users, the principles do not aim to put the onus on users to be solely responsible for the content consumed or produced online. Rather, the principles have been created to encourage platforms to incorporate media literacy considerations into the different stages of their work.

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.

Alongside this document, we are publishing quantitative research on the efficacy of on-platform interventions – in this case, in-feed prompts. Ofcom's Behavioural Insight team and the Behavioural Insights Team (BIT) conducted a randomised controlled trial to test prompts to encourage adults to actively choose how much sensitive content they see. The research found that, on a simulated social media platform, prompts were effective in motivating people to check their content settings. Without a prompt, only 4.3% of participants checked their content settings. A prompt highlighting that content controls could be updated in two clicks increased the number of participants who checked their content settings to 22.5%. This prompt was more effective than an alternative with a message highlighting that they were in control of their feed (16.7% checked). Users may have concerns that changing content settings is onerous and the message helped mitigate these concerns. Additionally, participants who saw the prompt after, rather than before they had engaged with the social media feed, were more likely to check their settings (21.5% vs 17.7%). Prompt effectiveness increases i) if the prompt comes at the right time, ii) and if checking and updating content settings is perceived as being easy. In a real-world context, users may encounter many prompts from different platforms or repeated prompts from the same platform. We did not test these scenarios, but it would be important for platforms to consider the cumulative number of prompts users receive and avoid overwhelming them.

Insights from the conversations with platforms, the YouGov and the BIT research were very valuable in informing this work.

Call for Input

Following our work with both internal and external experts, on 31 October 2023 we published a draft set of 12 Best-Practice Principles for Media Literacy by Design (the Principles) as a call for input. Between November 2023 and January 2024, we invited stakeholders to provide feedback and help us shape the final version of the Principles, setting out areas where we wanted to focus stakeholders' views.

Common and recurrent themes amongst respondents included:

Our overall approach

Most respondents agreed with the typology used to frame the Principles, with some respondents highlighting other elements to be included in the list of examples (e.g., an explicit focus on sponsored content, hardware, algorithm literacy, etc.). We have incorporated feedback where possible while maintaining our focus on approach rather than providing guidance on specific issues.

Media Literacy by Design and the Online Safety Act

Some respondents called for the Media Literacy by Design project to be more closely aligned with the OSA Codes of Practice. MSOM works closely with teams across the Online Safety Group to achieve a coordinated approach. We expect platforms to use effective tools to empower users and support them in providing context to the content they see. Ofcom is working to achieve that through media literacy and working with online services.

The rise and impact of future technologies

Respondents saw AI as highly relevant to, and a potential opportunity for, the field of media literacy. Many respondents considered the Principles to be future-proof but we have taken on feedback to further emphasise the fact that the current list of interventions is not exhaustive.

Take-up and the role of Ofcom

Stakeholders had suggestions for how Ofcom can act as a convening and influencing force to foster a culture of shared learnings between stakeholders.

Monitoring, evaluation, and transparency

Some stakeholders said that platforms needed to be more transparent about the impact of on-platform media literacy interventions as the lack of data limits shared learning opportunities. However, platforms raised concerns about the potential risk of data sharing. In drafting the Principles regarding monitoring and transparency, we have looked to balance both these perspectives.

Proactivity and the role of external stakeholders

There were calls for platforms to be more proactive in their approach to prioritising media literacy and suggestions that external experts, auditors, and trusted voices can help platforms here where data may be limited or unreliable.

Tailored interventions

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

- Further details on the responses to the call for input can be found in the summary of responses published alongside the principles.

2. Principles

Media literacy is about people's knowledge, understanding and skills. Together, these play an important role in helping internet users to engage with online services critically, safely, and effectively, so that they can maximise the benefits and minimise the risks associated with being online. In addition to understanding content and its context, media literacy is also about helping users understand the environment in which they operate online. Through working with online services, we have the potential to promote media literacy to the millions of people that use social media, search, video-sharing and gaming services to enhance and enrich their lives on a daily basis. Working with online services therefore builds on, and is a necessary complement to, our collaborations with a range of organisations to conduct on the ground and virtual interventions with people from underserved communities.

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. By adopting these Principles platforms can support the safe and rewarding use of their platforms. Creating a safe and sustainable positive experience on-platform is in the interest of both the user and online services.

Typology

On-platform interventions are varied in their focus, design and aims. Current examples of on-platform interventions include, but are not limited to, labels, overlays, pop-ups, notifications, and resources.

Application of these Principles

These Principles will be relevant to online services of all sizes.

These Principles are intended to apply to services' more general approach to media literacy and platform design as well as the development of specific products, interventions, and support. Whilst the Principles suggest ways in which platforms can best support users, interventions based on media literacy by design principles should not be seen to place onus on the user for their experience online. Rather, the intention of these Principles is to advise platforms as to how they can provide the tools necessary to develop users' media literacy skills.

These Principles are neither exhaustive nor legally binding but rather are intended to encourage best practice, and trigger consideration and conversation on what can be done to promote the media literacy of online services' users. These Principles are high level in nature to allow platforms to follow them during the design of existing and future services, as technologies such as Artificial Intelligence (AI) change the way that users engage with online services. These changes, and the differences that exist amongst online services, mean that services may find some Principles may apply more than others.

We have been working closely with colleagues across Ofcom to ensure that our recommendations inform and align with, where appropriate, our expectations of regulated services under the Online Safety Act (OSA).

Proactivity, Priority, Transparency and Accountability

A transparent strategy that prioritises the pro-active promotion of media literacy is essential in holding online services 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 are pro-active rather than just reactive in their approach to media literacy by design. This could include, but is not limited to:

   - **Online services creating 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.

   - **On-platform interventions to promote media literacy are developed and deployed** as part of preventative strategies in addressing potential harms.

   - **Services go beyond a focus on specific harm prevention and consider how media literacy skills (e.g., critical thinking) can be encouraged** and developed by their users/communities when interacting with the service.

2. Where data challenges and limitations create barriers for informed action, platforms collaborate with external experts, auditors, and trusted voices (could include survivors and victims, those with lived experience, etc.) to consider how to remain proactive in their approach to implementing media literacy by design.

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

   - Where possible, platforms should encourage the exchange and sharing of knowledge and expertise outside of the organisation. This should be done with the objective to create an environment in which stakeholders work together and share ideas as well as feedback to foster a knowledge-sharing culture.

4. **Online services are transparent regarding the need for interventions as well as the cumulative impact / interaction of interventions**. The rationale behind interventions is communicated in a clear and simple way that is intelligible to most / the targeted audience. The risk of user friction and fatigue is considered in deciding what interventions are appropriate.

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, and how online harms impact different user groups.

5. **Best-practice media literacy by design is inclusive**, recognising that any design decision will affect the experiences of users differently. Therefore, in designing their services, platforms focus on 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. Tailored support for those with disabilities or accessibility needs is provided, with consideration for users at different developmental stages.

- Platforms consider any specific media literacy interventions that may be necessary to address particular harms or the needs of children or vulnerable groups. For instance, platforms should consider how media literacy by design can be used to tackle content and activity that disproportionately affects women and girls, including those with multiple protected characteristics.

- Where possible, and in line with privacy guidelines, interventions should be tailored to the needs of the audience they target and developed as a result of engagement with members of that audience.

6. Best-practice media literacy by design understands the user not only as a consumer of, but also as a producer of content. **A best-practice approach considers how to embed the support needed to produce media content responsibly into a user journey.**

7. 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 risks and behaviours that can prevent harm as well as around how to correct mistakes**. Platforms consider the optimal time to provide users with relevant information to limit user disruption and fatigue.

8. Best-practice media literacy by design is based on research, evidence and engagement with the relevant users, communities, and experts. To ensure relevance, platforms consider working with target audiences to co-create interventions.

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

10. 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 for understanding whether 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.

11. Best-practice media literacy by design defines what success means, what it would look like and how it would be measured from the outset of a project.

- Best-practice media literacy by design establishes:
  - Media literacy outcomes (ideally a benefit received by the target audience) to be achieved as a result of the work.

- o Media literacy outcome indicators (measurable pieces of evidence that allow users to track the change that has taken place as a result of their intervention).

12. Interventions are monitored for effectiveness and impact. Interventions are 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, for example, 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.

13. Online services regularly share the findings of their experimentation and observation on the effectiveness of media literacy interventions with the widest community possible as part of showing leadership and initiative in this area.

- Services share results and findings with Ofcom to contribute to the continued development and sharing of knowledge and evidence on best-practice media literacy by design.

14. 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. To do so, online services can work with external auditors to evaluate the performance of on-platform interventions.

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