

Your response

Question	Your response
<p>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).</p> <p>(a) Do you agree with this categorisation of on-platform interventions?</p> <p>(b) If not, please explain.</p>	<p>Confidential? –N</p> <p>The list of interventions seems comprehensive, and covers the key ways that media literacy can be promoted on platform.</p> <p>There are some areas which we would want to ensure are covered in such a range of interventions. For example, the consultation rightly highlights the importance of timely media literacy interventions. This can include providing media literacy information at the moment choices are being made to help make better informed decisions. We would want to ensure that other opportunities are clearly in scope, for example, thinking of the journey of the user on a platform. Clear moments for media literacy interventions are present at the moment the user joins a platform, for example, or when they look to change their default settings. We want to be clear that such opportunities are included in the in-scope interventions listed.</p> <p>Such moments are important, but they provide a ‘blink and you miss it’ opportunity on a user’s journey onto a platform. The interventions listed in this consultation can serve to counter this by being a vehicle to remind users of what was communicated at these moments, and can help to help bring the terms of service to life for a user, for example, so they know the rules of the service, at moments beyond when they join the platform.</p> <p>It would be worthwhile illustrating that these are examples of current on platform interventions, as there must be potential for developments in this area, and the expectation that surrounds generative AI supports this case. We would not this list to limit the ambitions of on platform media literacy and instead want to highlight the need to future-proof this area of work.</p> <p>Most services have Safety Centres. The relationship between ‘Resources’ and the Safety Centre is something worth being clear about. From our perspective, resources as described by Ofcom can</p>

	<p>appear to the user in their interactions on the platform and can be formed of or advertise resources in the Safety Centre, and be used to make the user more aware that this Centre exists.</p>
<p>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?</p>	<p>Confidential? – Y / N</p> <p>The themes seem logical. There is an overlap between what is a ‘harm reduction tool’ or something served in response to likely harm and what serves as a media literacy intervention. For example, an overlay by itself is not necessarily media literacy, but provided with additional information, for example, an explanation, steps you can take if you do see something upsetting online, links to support, can help to make this more of a media literacy intervention.</p> <p>One of the themes outlines how platforms see themselves as different to other platforms and to a degree this is the case and it makes sense to recognise these differences. It is reasonable to imagine that what might work for one platform may not necessarily work for or be relevant to all (or some) other platforms. However, it would also be right to point out that there are great similarities, and we should look at highlighting best practice examples of media literacy interventions to stimulate learning between platforms. There is certainly scope for cross platform media literacy where a shared message is relevant, drawn from discussions between platforms, or supporting wider campaigns from outside, such as Safer Internet Day.</p>
<p>Question 3: Are we missing anything with the three headings used to structure the best practice principles for media literacy by design?</p>	<p>Confidential? – Y / N</p> <p>The structure and the principles make sense.</p>
<p>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)?</p>	<p>Confidential? – Y / N</p> <p>The structure and the principles make sense.</p> <p>The opportunity is an important one to maximise, using the platforms to promote the media literacy of their users. And ensuring effectiveness through monitoring and evaluation will help.</p>

Other areas not specified at the principles level, and would at least be worth containing in any guidance that accompanies these principles, if not in the principles themselves, include:

- Users of all ages? Building on the recognition of the need for inclusivity, there is a question about being user-centric. The OSA may address the issue of under age use of services, but thought should be given to the younger audience at this stage, given what we know about underage use of services.
- Being current: the information and support for users needs to keep pace with the continual development and change in platforms, as well as providing interventions relevant to the issues that are currently affecting users.
- Timely interventions: there are moments when messaging can help influence a decision and better inform the user. However, there is a balance to be struck here, referred to in the results of Ofcom's research where repeated exposure can lead to irritation and can be counterproductive. We would want to encourage providing repeated opportunities to guard against the 'blink and you miss it' or box-ticking approaches, and the third principle of monitoring and evaluation, measuring the effectiveness of interventions should help here. We would always prioritise the safety of users over the risk of irritating users, but appreciate a balance has to be struck.
- Practical/positive/engaging/accessible: from our experience of working in the field of supporting the development of media literacy we have found the best information delivered would be of practical use and support positive use. It also needs to be engaging, relevant, easy to understand and accessible. Some of these points are articulated in the principles.

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

Confidential? – Y / N

The platforms will need to enable a mixture of responses that can be preventative, ensuring all users are informed both about safety on the platform but also about safety more widely too, as well as responsive, in relation to an action of a user or a piece of content.

There is the opportunity for platforms to connect with and point to initiatives outside of their platform, to help strengthen their own activities, as well as collaborating with external stakeholders to help carry their own messages in an appropriate/relevant way. There is reference to engaging with external stakeholders to a limited degree in these principles, but the opportunity is greater than that which is described. Many platforms get involved in [Safer Internet Day](#) or other national campaigns, for example, and can work to carry messages that are not-platform specific but still improve the media literacy of their users.

We know from our experience of media literacy work that working with the target audience can help develop effective messaging, and although there will be challenges in working with and catering for a wide diversity of users, there can be efforts to co-create messages to help make them more engaging with the target audience. We have done work like this at Childnet, from our work on tackling online sexual harassment amongst teens, to providing online safety advice to children and young people in Wales. This work can be both informed by users and co-created with them.

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?

Confidential? – Y / N

Some examples show some different approaches.

Regular interventions:

Privacy check up by Facebook, see <https://www.facebook.com/help/443357099140264>

This was started as something offered for everyone, and the current iteration allows users to set the regularity of this prompt themselves.

Timely interventions:

Yubo real time intervention on social video, intervention, see <https://www.yubo.live/blog/real-time-intervention-on-social-video> . This is an

	<p>intervention to prevent harm, but carries clear media literacy properties.</p> <p>Peer -to-peer:</p> <p>There have been efforts to enable users to look after or feedback to each other on platforms, for eg social reporting on Facebook, that can provide another element to the approaches listed.</p> <p>From the work we do at Childnet, we know that this voice can be an important one, and can add to media literacy efforts.</p> <p>Services can also ask for feedback from their users on their interventions. For our peer-education platform underpinning the Childnet Digital Leaders Programme we ask for and receive feedback at regular intervals from the young people using the service to enable iterative improvements to our work.</p>
<p>Question 7: How do you expect in-scope services to demonstrate that they have adopted the principles? What would this look like?</p>	<p>Confidential? – Y / N</p> <p>It would be worth asking for reporting by service providers of the interventions they have made. Although these principles are not statutory, giving the opportunity to share and respond to requests to share could help illustrate what support is available from platforms and help inform people’s expectations from the platforms of media literacy support.</p> <p>There can be low take up of online safety tools and there is certainly scope to look to take the work that is done on platform off platform too. Collaborations with external stakeholders, voices that are trusted by key audiences are important to involve to help spread key messages. This point is also relevant because not all media literacy interventions need to be platform specific. They can be broader media literacy that are relevant to users of a platform but just as relevant to the wider population of online service users and those that have care responsibilities for such users.</p>
<p>Question 8: What more can be done to encourage services to promote media literacy by design?</p>	<p>Confidential? – Y / N</p> <p>Highlighting good examples.</p> <p>Highlighting effective practice.</p>

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?

Confidential? – Y / N

Improving the media literacy of online platform users is in everyone's interest - of users, of providers, of those with responsibilities for users and more. The current language of online safety is rightly reflecting the importance of a rights-based approach, and as such there is scope for a 'best interests of' the child or adult user to be achieved, reflecting that outlined (for children) in the Age-Appropriate Design Code. This would push such media literacy initiatives and interventions into a more statutory duty on providers rather than best practice principles. People should expect to be informed, and service providers should have to meet these expectations.

Parents and carers are the closest form of support for most young people, and our research consistently shows them as the people young people turn to if they are worried about something online. It is imperative that they are supported in being able to fulfil this role effectively. This is something that is still likely to be the case in 5-10 years time, and we have evidence from our research that we will launch on Safer Internet Day 2024 highlighting the majority of parents worried that the fast-changing online world poses risks to their child.

Looking at how media literacy by design can cater for this group of people, acknowledging privacy considerations and restrictions, can be something to include, and the scope of what is possible here may change with the development of AI.

Again, from the research we are releasing on Safer Internet Day 2024, we hear from both children and young people as well as parents and carers that they want to be heard in relation to discussions around online safety and wellbeing on online platforms. Mobilising user voice and feedback can be an important element in this area of media literacy, beyond evaluation, but in the design process.