

## Your response

Question	Your response
<p><b>Question 1:</b> Do you agree with our proposals in this section? Please explain your reasons and provide any relevant supporting evidence.</p>	<p>Confidential? – N</p> <p>While Good Things Foundation is broadly supportive of the goals, we urge Ofcom to consider more fully the interplay of media literacy with digital literacy and digital inclusion in research and evaluation, and sharing knowledge of ‘what works’ in delivery.</p> <p>GOAL ONE: Continue to use our research to inform our policy development and media literacy interventions, and to encourage its use and further analysis by stakeholders.</p> <p>Recent research on developing the Minimum Digital Living Standard (<a href="http://www.mdls.org.uk/publications">www.mdls.org.uk/publications</a>) gives a strong rationale for Ofcom to lead a more holistic, integrated approach to media literacy in this digital age. Defined by and developed with members of the public using the proven Minimum Income Standard deliberative methodology, the MDLS identifies that a household needs a combination of media and digital literacy or capabilities as well as digital access. The MDLS framework presents these as: critical skills for understanding and managing digital risk (media literacy), practical or functional skills for engaging online (digital literacy), and digital goods and services (digital access). All are needed in combination for a households to meet the following definition: <i>‘A minimum digital standard of living includes, but is more than, having accessible internet, adequate equipment, and the skills, knowledge and support people need. It is about being able to communicate, connect and engage with opportunities safely and with confidence’</i>.</p> <p>Ofcom already has a track record of collecting, sharing and analysing data relevant to the MDLS: on digital goods and services (e.g. Affordability of Communications Services, Technology Tracker) and on both media and internet use and attitudes (relevant to MDLS practical skills, and critical understanding skills). As the Minimum Digital Living Standards definition and framework gains traction, it would be a huge missed opportunity if Ofcom stepped back from its role in monitoring digital access, attitudes, behaviours and capabilities in the round. Ofcom’s research goals should align with a vision in which everyone is supported on their journey to become</p>

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	<p>media literate - and in a digital age, this requires a focus on media literacy <i>and</i> digital inclusion.</p> <p>GOAL TWO: Amplify the voices and testimony of a range of groups within society so that our research is useful to as many people and organisations as possible.</p> <p>Good Things Foundation have found past research, analysis and reports produced by Ofcom to be invaluable in supporting us to build the case for digital inclusion - addressing access, skills, confidence, motivation, trust - and to develop our targeted interventions and resources. Ofcom plays a unique role in the ecosystem of being able to invest in research methods and approaches that many VSCE organisations struggle to make. This supports more effective decision making and policy making at multiple levels and across sectors.</p> <p>Continuing to hear the voices of people who are offline, and people who face digital barriers (so they may have limited access or limited skills) is essential at a time when millions of people in the UK still face digital barriers, and there are rising public and policy concerns about digital exclusion, pace of digitalisation and implications of new technologies like AI. While data from surveys run by Lloyds Banking Group and Nominet are highly valued, we see these as supplementary to Ofcom's trackers and research programme, not as a substitute.</p> <p>We urge Ofcom to ensure its research goals, questions, methods, and selection of interventions for support and evaluation respond to this context - including 'narrow' and 'limited' internet users as well as those who are completely offline, or newly online. We highlight this because the current emphasis in the strategy is heavily focused on children (and the adults in their lives), and on people who are already online. Yet Ofcom's past research has successfully and significantly highlighted the <i>spectrum</i> of internet and media experiences, access, and capabilities.</p> <p>We agree with intentions to prioritise the voices of certain groups (people experiencing financial disadvantage, older people, children) and boost samples, reflecting protected characteristics. Limited sample sizes - especially around ethnicity - have held back <i>intersectional analysis</i>. We would urge Ofcom to not only consider protected characteristics - since low income, area deprivation, and educational attainment are all highly relevant to digital</p>

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	<p>media literacy and access but would fall outside the framework of protected characteristics.</p> <p>The consultation document outlines traditional methods of data collection. We welcome continued use of telephone surveys so more people who are offline can be included, but note that access and affordability barriers may exclude some people, especially those facing financial disadvantage. Ofcom's Affordability Tracker (2024) suggests that around 2.4m households find it difficult to afford their mobile phone contract, for example. Use of face-to-face methods as well as telephone and online surveys is important, alongside in-depth qualitative research interviews and longitudinal research for deeper understanding of adults' and children's digital media lives today. The investment required to do quality longitudinal research, especially with underserved groups, puts this out of scope for VCSE organisations.</p> <p>GOAL THREE: Share our knowledge on 'what works' in media literacy delivery. GOAL FOUR: Support providers of media literacy initiatives to carry out evaluation, leading to a culture where best-practice approaches are developed, shared and used to develop more effective interventions</p> <p>Good Things Foundation recognises the value of Ofcom supporting effective evaluation of media literacy initiatives to build a strong foundation for competency framework development that educators can use. Significant expertise exists in organisations, including ParentZone, Internet Matters, Good Things Foundation and some members of Good Things Foundation's National Digital Inclusion Network, to use competency frameworks and evidence to develop skills packages for individuals who experience different digital and literacy barriers. Investment in further content development will enable hubs, like those in the National Digital Inclusion Network, to access a wider range of appropriate resources to use with their specific local communities.</p> <p>We support and encourage Ofcom to continue providing clear frameworks, examples of 'what works' and evidence of the benefits of more coordinated investment at both an earlier stage in schools, and - importantly - on an ongoing basis as adults - lifelong learning. This is essential if we are to create a digitally safe and inclusive society for children and adults. As findings from the MDLS survey of households with children identified (from an in-person survey of 1,582 households across the UK), over a</p>

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	<p>quarter of households don't have the level of critical skills (digital media literacy) for understanding and managing digital risk.</p> <p>We believe Ofcom can play a valuable role in facilitating and enabling others to convert learnings into interventions that work for their specific communities and populations around digital media literacy and inclusion.</p>
<p><b>Question 2:</b> Do you agree with our proposals in this section for working with platforms? Please explain your reasons and provide any relevant supporting evidence</p>	<p>Confidential? N</p> <p>GOAL ONE: Build on work prioritising users' media literacy on platform by promoting best practice.</p> <p>GOAL TWO: Ensure that platforms embed evaluation to build understanding of what works to promote media literacy.</p> <p>GOAL THREE: Work to ensure platforms' funding of media literacy programmes.</p> <p>At Good Things Foundation, we believe that digital inclusion is a shared, collective responsibility - within which UK government - alongside governments in the devolved nations, regions, and locally - has a key role to play in enabling everyone to benefit from digital technologies in their lives, and in enabling everyone to be able to access the local (as well as online) support needed to benefit, and to do safely and confidently.</p> <p>We believe that Ofcom and other regulators, as well as the major tech platforms, telecoms industry, and others across private, public, voluntary, and community sectors - also have roles to play, as well as individuals, families, businesses, and communities.</p> <p>The unique position of the platforms - particularly in the context of digital media access and literacy - makes their role critical. While we welcome the goals set out Ofcom's strategy around promoting best practice, building understanding, and funding media literacy programmes - we urge Ofcom to be more ambitious in its approach with platforms and expectations. As digital technologies continue to develop at pace, including increased access and use of AI and generative AI tools, and with growing concern about loss of public trust in technology and how personal data is collected, used, and shared - it is more vital than ever that Ofcom leads and uses its powers, resources, and relationships fully to ensure that platforms playing their fullest part within the scope of existing legislation and guidance.</p>

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	<p>Organisations like Ofcom, Good Things Foundation, Internet Matters, ParentZone, and many others all understand that interventions to develop and deliver effective media literacy support - especially in community or workplace settings (i.e. outside the school environment). Currently, the responsibilities for building digital media literacy are falling too heavily on the shoulders of individuals - of all ages - and on the shoulders of local educators, support workers, volunteers, work colleagues and others - who themselves may feel ill-prepared to guide others to build their digital media literacy. This comes strongly through academic research on the Minimum Digital Living Standard for Households with Children, from University of Liverpool's previous research on Citizens and Big Data, as well as from research by Ofcom, Nominet, Lloyds Banking Group, British Academy, and other academics.</p> <p>We welcome Ofcom's proposal to encourage multi-year support for digital media literacy programmes which are collaborative and co-created, and adequately resourced to reflect the time and skills required in delivering support. We would like to see more detail about how this will be encouraged and monitored to avoid poorly coordinated investment into programmes. Importantly, however, we would like to see greater focus on <i>preventing</i> the demands for high levels of digital media literacy among the population as a whole - and especially thinking about children, older people, parents, those experiencing financial disadvantage and other forms of disadvantage.</p> <p>The best outcome would be to reduce the currently high (and growing) pressures and requirements on children, young people, adults, employers and others to develop high levels of digital media literacy. We believe this will require more proactive and ambitious leadership from Ofcom than the goals for platforms as articulated in the proposed strategy.</p>
<p><b>Question 3:</b> Do you agree with our proposals in this section? Please explain your reasons and provide any relevant supporting evidence. We are particularly interested in any views and evidence about whether a Media Literacy Week would be impactful.</p>	<p>Confidential? N</p> <p>Yes. Good Things Foundation recognise that the expertise in communities needs to be utilised to ensure the lessons gathered from research and evaluation are shared, and that work is undertaken to support and enable organisations to learn from and implement these at a local level, reflecting local communities. Delivering this appropriately, effectively, and in ways that strengthen</p>

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	<p>national social infrastructure, requires adequate funding and wider support.</p> <p>As well as target communities identified by Ofcom (those experiencing financial disadvantage, older people, children), our experience also highlights the following:</p> <p>Parents of children: The Minimum Digital Living Standard research highlights the 1 in 4 households with children (27%) where parents are missing the critical skills for understanding and managing digital risk. Care must be taken to ensure the parents of children and young people are supported to build these critical skills.</p> <p>Adults of all ages with no, low or limited digital skills: Consideration should also be made of the 8.5m people who are digitally excluded or limited users because they lack the very basic digital skills - many are older, or unemployed, and/or have no formal qualifications, and/or have a disability or health condition. Digital media literacy is vitally important, as fears around data security, misinformation and disinformation, fraud and scams can be a major barrier to engagement or to using the internet more fully. So digital medial literacy cannot be separate from first having the support to be connected, build digital confidence, and a desire to learn more. Targeted interventions should recognise that the fear of the unknown and worries about safety are a big barrier for people accessing the online world or using it to its fullest extent (82%) (Lloyds Bank, 2023). Therefore communications may not work for these populations, and many people will not have the ability to <i>'use media and communications, understand it, and/or be able to create their own content'</i>.</p> <p>Considering the fears of those offline or whose use is limited is under-recognised in Ofcom's three-year strategy. Good Things Foundation suggests drawing on our expertise and the expertise of the digital inclusion hubs in our Network to develop Ofcom's understanding, whilst ensuring these organisations are well-funded and have the capacity to deliver.</p> <p>In over 10 years of operation, Good Things Foundation has developed an effective model to support local community based delivery of digital inclusion support. This model is effective as it relies on trusted faces in trusted places - community based delivery. People experiencing digital exclusion or lacking skills and confidence find these, non threatening hyperlocal</p>

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	<p>environment,, informal and friendly. These local digital inclusion hubs welcome additional training and support to develop their skills and the content that they deliver - they would greatly benefit from continuous professional development. Understanding more about the digital world, allaying fears about safety and introducing media literacy will be a key enabler to reducing the digital divide - as a consequence, in developing a CPD offer we encourage Ofcom to consider how to broaden this offer more effectively through community hubs and adult learning providers to continue effectively reaching those currently unable to fully access the online world .</p> <p>Ensuring there is clarity and explanation of the relationship between media literacy, digital literacy and digital inclusion will help ensure Ofcom meets its goal to '<i>make communication work for everyone</i>'. People will be unable to be media literate and '<i>use and create media and communications</i>' if they lack the basic digital skills to be online or they are unable to afford to be online. Good Things Foundation recognises and supports Ofcom's goal of building on digital inclusion infrastructure - but the specificity and actions to address digital exclusion and low digital use are limited in the current three-year strategy. There is a huge opportunity to make significant strides in this space if Ofcom takes leadership in addressing the core barriers to digital inclusion - Good Things Foundation would welcome the opportunity to work collaboratively with Ofcom to further develop proportionate and appropriate actions in this part of your strategy.</p> <p>Good Things Foundation has welcomed the opportunity to support Ofcom's 'Making Sense of Media' workstreams in the last few years. We have worked alongside colleagues to support the improvement of research and evaluation, and believe there is significant opportunity in your evolving strategy to work even more closely in the future as Ofcom evolves its approach to reach into communities and cohorts who are most excluded and explore your CPD content for educators.</p> <p>The National Digital Inclusion Network reaches into communities that are underserved: 55% of the Network are in the bottom three most deprived wards in the UK; our programmes are effective at reaching populations who are underserved such as ethnic minority communities (only 31% of the people we support are White compared with national population of 75%).</p>



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	<p>An ambition to broaden and deepen your partnerships is welcomed, and members of the National Digital Inclusion Network would be keen to explore how they can support Ofcom's strategy further. However, consideration needs to be made of the precarious financial situations of many of these organisations. The Network of digital inclusion hubs relies on funding to continue to do the work that they do. Good Things Foundations small grants programme can partially support hubs' delivery of digital inclusion support - yet, greater investment is necessary. Greater emphasis on local delivery models to improve media and digital literacy is required and we encourage these models to be invested into so they maintain consistency and impact.</p> <p>With regard to National Media Literacy Week, Good Things Foundation recognises the impact that public awareness campaigning can have and encourages Ofcom's lead of a Media Literacy Week - rolling out engaging activities across the UK to establish buy-in, bringing the media and digital literacy sector together, and raising the profile of the issue as a whole.</p> <p>We would be delighted to liaise with Ofcom about the campaign, and share our experience of having run Get Online Week annually for well over a decade, to raise awareness of digital exclusion and publicise digital inclusion hubs and the local support they provide. Get Online Week runs every October, and last year 423 members of our Network ran 877 events reaching an additional 16,663 people who are limited digital users or experiencing digital exclusion in the UK.</p> <p>Good Things Foundation would be willing to support Ofcom during it's Media Literacy Week on specific content related to adults with no/low digital access and skills, and sharing also our emerging experience of developing learning content around AI literacy for adults experiencing digital exclusion.</p>
<p><b>Question 4:</b> Do you agree with our assessment of the potential impact on specific groups of persons?</p>	<p>Confidential? N</p> <p>Please see our response to Question 1 which supports this while urging an approach that includes but goes beyond specific protected characteristics.</p>



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<b>Question 5:</b> Do you agree with our assessment of the potential impact of our proposals on the Welsh language?	Confidential? N