

## **Internet Matters submission to the consultation on Ofcom's Three-Year Media Literacy Strategy**

June 2024

### **About Internet Matters**

**Internet Matters is a not-for-profit organisation dedicated to supporting parents and professionals to keep children safe and well online.** We are one of the most popular information sources among parents. We were able to provide crucial online safety and wellbeing advice to over 9 million parents in 2023, of which 95% felt prepared to handle online safety issues that their child might encounter as a result.

In addition to our expert guides and resources for parents and teachers, we also have a Policy and Research function. We use our insights to **champion the views and interests of families, making evidence-based recommendations to all those with influence over children's digital lives.** This includes our industry partners as well as government, policymakers and parliamentarians. Internet Matters is represented on the Government's Media Literacy Taskforce Steering Board and the Executive Board of the UK Council for Internet Safety (UKCIS), as well as Ofcom's Making Sense of Media Panel. We chair UKCIS's Vulnerable Users Working Group.

### **Overarching points**

Internet Matters warmly welcomes the draft publication of Ofcom's three-year vision for media literacy. We agree that media literacy shouldn't be seen as secondary to online safety regulation, and it is encouraging to see some ambitious thinking within the draft strategy.

We also agree that media literacy is "everyone's business". Our starting point is that children's online safety and wellbeing is a shared responsibility between tech companies, Government and regulation, parents and the services that support them – including schools and the media literacy sector. We are glad to see Ofcom draw on the expertise of the sector and support it to do more.

However, we think that there is scope for Ofcom to go further and promote media literacy skills on a greater scale than is currently provided. Our six key overarching recommendations for the strategy (which are further detailed throughout our full response) are as follows:

1. **Ofcom must correct the balance between the needs of the most vulnerable, against the need for a quality universal offer.** For children and families, schools have a central part to play in this. It is promising to see some initial steps from Ofcom towards making a high-quality media literacy teaching in schools a reality, for example through teacher training, but more needs to be done. This will require close collaboration with the Department for Education and Ofsted to develop and evaluate a strong media literacy curriculum. As a unifying force, Ofcom can offer guidance with evidence and evaluation for classroom-based media literacy programmes. We set out what better media literacy education in schools could look like, including the role of Ofcom, in our new 'Vision for Media Literacy' paper.<sup>1</sup>
2. **Sustainable funding for the sector must be part of the solution,** particularly in the context of a challenging and evolving funding environment. We encourage Ofcom to consider how the forthcoming industry levy for online safety regulation will impact upon funding for third sector

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<sup>1</sup> Internet Matters, 2024, A Vision for Media Literacy: Charting the path for media literacy in schools, [link](#).

media literacy programmes. Robust evaluation for interventions is important, but sustainability is the real challenge to third sector organisations.

3. **We encourage Ofcom to develop a more coherent read-across between Ofcom's media literacy strategy and its new powers under the Online Safety Act.** In particular, we recommend that Ofcom considers how the regime may strengthen its influence on platforms to develop and evaluate on-platform media literacy interventions. The current approach appears to rely on voluntary efforts by platforms, without clear levers to ensure compliance.
4. **We welcome the issues identified by Ofcom as priorities for awareness-building and intervention,** including exposure to mis- and disinformation and violence against women and girls (VAWG). Our own recent research with children and parents demonstrates the impact of poor media literacy on sexist and misogynistic attitudes and behaviour among young people.<sup>2</sup> Mis- and disinformation are also important areas for the media literacy strategy to address, given the lack of coverage in the Online Safety Act. However, it is unclear how the sector will be able to feed into Ofcom's decision-making process as it prioritises areas for research and intervention on an ongoing basis.
5. **We feel that it is important for Ofcom to highlight the benefits of connected technologies while tackling the harms,** especially in the context of ongoing debates about removing children's access to smartphones and social media altogether. Our recent research on attitudes to smartphone and social media use shows the extent of apprehension that many parents feel about children having access to online services. The largest share of parents (44%) support a ban on social media for under-16s (compared to 35% who do not).<sup>3</sup> Ofcom's mission in this space is to ensure that all users of online services, including children, are able to confidently and safely navigate online spaces. But it can't do that without being bold about the positives of being online and by communicating what is being done to keep children safe online, including through the Online Safety Act.
6. **Finally, we feel that there is more work to be done to define clearer outcome metrics for what Ofcom is hoping to achieve.** The strategy sets out metrics for individual workstreams, all of which are valuable, but not for the outcomes of the strategy as a whole.

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<sup>2</sup> Internet Matters, 2023, 'It's really easy to go down that path': Young people's experiences of online misogyny and image-based abuse, [link](#).

<sup>3</sup> Internet Matters, 2024, Attitudes to smartphone and social media use among parents and children. Publication forthcoming.

### **Q.1 Do you agree with our proposals in this section? Please explain your reasons and provide any relevant supporting evidence.**

The Making Sense of Media (MSOM) programme continues to be an invaluable source of data on the media literacy skills of children and parents in the UK. Media literacy research is critical, and MSOM data coupled with our own regular tracking insights<sup>4</sup> show that the baseline media literacy capabilities of the general UK population remain stubbornly poor.

The ongoing collection, analysis and publication of media literacy data is vital for demonstrating the urgent need for effective media literacy provision to support children and adults (including parents) to better navigate online environments.

#### *Consolidation*

It can be challenging to keep up with the volume and various outputs from the MSOM programme. **We encourage Ofcom to consider ways to consolidate the key findings and analysis across different reports to support the sector in navigating the datasets.** It would also be helpful for analysis to draw links between findings from the MSOM research and research being conducted by others working on online safety within Ofcom.

#### *Focus*

We support the priority focuses outlined in the strategy to explore the impact of poor media literacy on mis- and disinformation and communities that promote harmful views against women and girls.

- Our own research into the drivers behind misogynistic communities demonstrate that both teenage boys and younger dads are particularly susceptible to messages from misogynistic influencers, such as Andrew Tate. Algorithmic feeds (based on demographic data), coupled with poor media literacy education on online misogyny (for example, the business models of influencers) were identified by teenagers and parents as the key factors behind the growth of online misogyny among younger male demographics.<sup>5</sup>
- **We feel that it is important for Ofcom to research and work to tackle the specific dynamics and drivers of child-on-child gender-based violence and abuse, as well as adult-perpetrated VAWG.** This is especially pressing given the fact that more than half of CSEA is child-perpetrated.<sup>6</sup>

While we support the focuses set out in the strategy, **we encourage Ofcom to consider ways in which the sector could play a more active role in deciding ongoing media literacy research focuses.** The Research Working Group<sup>7</sup> provides direction and feeds into decisions on research. But the Working Group is limited in number and remains predominantly academic-oriented. We think there could be a greater role for the media literacy sector to support decisions around research focus, for example through more frequent engagement and consultation exercises.

#### *Programme evaluation*

Robust evaluation is critical for the sector to understand the efficacy of media literacy programme design and delivery. However, challenges to evaluation are inextricably linked to wider funding challenges for new programmes and initiatives [see response to Q.3, People and Partnerships]. **We recommend that Ofcom evaluates existing media literacy programmes as well as new initiatives.** We feel that this should also include scalable projects, beyond small audiences in targeted place-based interventions.

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<sup>4</sup> Internet Matters, 2024, *A Vision for Media Literacy: Charting the path for media literacy in schools*, [link](#).

<sup>5</sup> Ibid.

<sup>6</sup> NCA, 15 January 2024, 'Child Sexual Abuse and Exploitation Analysis Launched', [link](#). 52% of all CSAE cases involved reports of children (aged 10 to 17) offending against other children.

<sup>7</sup> Ofcom, 14 March 2024, 'Our Research Working Group', [link](#).

## Engaging platforms

### Q.2 Do you agree with our proposals in this section for working with platforms? Please explain your reasons and provide any relevant supporting evidence.

We welcome Ofcom's focus on the role of platforms in supporting users' media literacy. Online platforms and services play a fundamental role in shaping how children engage with and make sense of content and information. It is critical for companies to consider the impact of design choices on children's media literacy, as well as to form sustained partnerships with third sector organisations to build media literacy skills and awareness among young users and their parents.

#### *'Best practice' and alignment with the Online Safety Act*

It's very promising to see Ofcom begin to make links between its ongoing work to promote media literacy in the UK, and its new duties under the Online Safety Act (OSA).

We strongly support Ofcom's suggestion of further work to draw the explicit linkages between media literacy and online safety Codes of Practice. **We encourage a clear articulation and framework setting out how the two strands of work cohere.** In particular, we suggest that **Ofcom works to ensure that media literacy research explicitly builds on online safety policy development, and vice versa.** For example, findings from platform supervision and transparency powers (under the OSA) should directly inform the evolution of media literacy work.

We support the focus on 'best practice' proposals for media literacy, i.e., beyond the minimum standards set out in draft online safety Codes of Practice. **However we believe that a 'best practice' approach should become the ultimate ambition for online safety Codes of Practice.**

#### *Evaluation*

Transparent, multi-year evaluation of on-platform media literacy interventions is essential. We welcome the strategy's specific focus on evaluation, and in particular interventions to address the role of 'persuasive design' in contributing to harmful online experiences.

However, there is little detail on the levers that Ofcom will use to 'encourage' platforms to abide by practice principles and to evaluate impact. We are concerned that the current approach, as set out in the draft strategy, continues to rely on the voluntary efforts of platforms to initiate and robustly evaluate interventions. Again, **a more coherent read across between Ofcom's media literacy strategy and its new powers under the online safety regime will strengthen its influence over platforms to invest in, and to evaluate media literacy interventions.**

#### *Funding*

More detail is also needed to understand how Ofcom will leverage its position and regulatory powers to secure funding from industry and for third sector media literacy programmes. It is right that funding must focus on multi-year impact and evaluation, but at a baseline it requires sustainability – this is the current and pressing challenge.

The UK's third sector plays a role in delivering media literacy interventions in partnership with industry. But funding lacks sustainability. **We encourage Ofcom to consider the impact of the future online safety levy to fund regulation on investment in media literacy.** The sector would benefit from more support from Ofcom in the bidding process for delivering interventions, as well as a greater sense of how it will support the third sector within the future funding landscape.

The metrics for success, as set out in the strategy, are largely orientated around the use of funding for evaluation. **We feel that a key metric should also assess the availability of funding for media literacy programmes, with specific targets for this objective.**

### **Q.3 Do you agree with our proposals in this section? Please explain your reasons and provide any supporting evidence. We are particularly interested in any views and evidence about whether a Media Literacy Week would be impactful.**

There is much to praise in Ofcom's strategic objectives for partnerships to promote media literacy. For example, it is welcome to see the focus on digital inclusion - our own partnership with the Good Things Foundation has demonstrated the value in integrating inclusion infrastructure with media literacy support for underserved communities.<sup>8</sup> **We encourage Ofcom to consider the ongoing work of the Digital Poverty Alliance to consolidate digital inclusion and media literacy offerings.**

We are also pleased to see Ofcom account for importance of engaging parent-focussed organisations; caregivers remain the key protective force in most children's online lives.<sup>9</sup>

However, we think there is further to go in terms of investment in universal offers, particularly through schools where children and families are most reachable.

#### *Scalability - targeted vs universal offers*

We welcome Ofcom's focus on targeted interventions for those who need them most, including children with vulnerabilities which are associated with heightened online risks. The children identified by Ofcom as needing targeted support for media literacy - those with SEN and disabilities, care experience, mental and physical health needs - match our own research into the groups of children with greatest need for additional support and protection online.<sup>10</sup> A child rights-based approach to delivery is also welcome.

However, we feel that there is more scope for detailing how interventions will be delivered. Specifically, **we would like to see a greater focus on digital interventions, in addition to face-to-face delivery.** This is particularly the case as more services move online, and digital interventions will provide a primary means for achieving scale and reach for wider audiences.

Further, **we feel strongly that targeted interventions must be matched with a universal offer.** While projects with small audiences in specific areas are likely to have a significant impact for the target group, the efficacy of this approach depends on ability to be scalable. **We recommend that Ofcom focus on testing national approaches in small geographic areas as a more productive approach than place-based interventions.**

#### *The role of schools*

**We see schools as the primary means of achieving scale for media literacy education.** Classrooms are arguably the best place to reach children with formal and informal media literacy learning. However, our recent research into achieving media literacy through schools identified five key barriers to effective provision in the classroom:<sup>11</sup>

1. The poor status of media literacy within the curriculum and lack of clear guidance for schools.
2. Lack of adequate training for teachers.
3. Inconsistent teaching resources, many of which are poor-quality or outdated.
4. Inconsistent approaches to parental engagement, with many parents (particularly parents of vulnerable children) receiving little or no outreach.
5. The broader environment, including competing funding pressures on schools and rapid changes in technology.

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<sup>8</sup> Internet Matters, 2023, *Together for a better internet: Impact Report 2022/23*, [link](#).

<sup>9</sup> Internet Matters, 2024, *Insights from Internet Matters' tracker survey (November 2023)*, [link](#). Children aged 9-17 are significantly more likely to speak to a parent when something goes wrong online (48%) than to take another action such as speaking to a friend (27%) or reporting the issue directly to the platform (25%).

<sup>10</sup> Internet Matters, 2020, *Refuge and Risk: Life online for vulnerable young people*, [link](#).

<sup>11</sup> Internet Matters, 2024, *A Vision for Media Literacy: Charting the path for media literacy in schools*, [link](#).

The strategy makes reference to workforce development on media literacy, including for teachers, mental health professionals and social care providers. This is welcome. But **the approach to media literacy in schools must go beyond teacher training**. Training in and of itself will not be effective unless teachers are provided with a framework within which to utilise the new skills they have acquired.

**We believe that Ofcom could be playing a more instrumental role in supporting the development and evaluation of a robust media literacy curriculum in schools.** This will require close work with the Department for Education (DfE) and Ofsted to develop and evaluate a media literacy curriculum that provides every child with the skills they need to thrive in the digital world. DfE and Ofsted have the direct means of reaching schools and educators, but both will require guidance and subject matter expertise from Ofcom's research and media literacy teams.

Internet Matters have recently published a paper exploring what needs to change on a wider scale to improve media literacy, with a focus on the school system.<sup>12</sup> This paper is cited below and attached to our consultation response.

*A national 'Media Literacy Week'*

**We support the idea of a national media literacy campaign that unites around a central day or week to raise awareness of priority issues.**<sup>13</sup>

However, given the generally poor levels of public understanding of the term 'media literacy' in the UK, it may be productive for **Ofcom to consider marketing a media literacy awareness-raising week in terms of the specific issues it is trying to tackle** (e.g. identifying mis- and disinformation, mitigating misogynistic behaviours or protecting personal information).

Again, we feel that schools are the best vehicle for promoting any national weeks aimed at media literacy. **We recommend that Ofcom collaborates closely with central Departments, including the DfE, DHSC and DLUHC, to harness existing networks and means of reaching target communities.**

Finally, we encourage **Ofcom to consider embedding media literacy into existing campaign weeks**, for example Autism Awareness Week. The approach of tapping into well-established national campaign moments may be a more effective way of building on Ofcom's goal of reaching the most vulnerable groups in society.

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<sup>12</sup> Internet Matters, 2024, *A Vision for Media Literacy: Charting the path for media literacy in schools*, [link](#).

<sup>13</sup> The efficacy of awareness-building campaigns can be seen in countries such as Finland which take a public health approach to strengthening societal media literacy. Source: European Commission, (last update November 2023), 'Finland: Media literacy and safe use of new media', [link](#). Accessed 18.06.2024.