

Consultation on Ofcom's Three-Year Media Literacy Strategy

ITV plc response

Global online platforms, video sharing platforms, and social media are used every day by the vast majority of people in the UK. Whilst they can bring many benefits, the sheer prevalence of harm online - whether disinformation and misinformation, illegal content, or bullying and harassment - is so significant that it led the Government to pass the Online Safety Act. The Government is clear that the Online Safety Act will *"make social media companies more responsible for their users' safety on their platforms."*¹ Given it is the products and services of these companies that are driving the vast majority of media-related harms, it is absolutely right that they should be held accountable for addressing them.

Ofcom's overarching message in its current consultation is that *"media literacy must be the responsibility of everyone."* In this context, we observe that ITV already makes a hugely significant contribution to media literacy through its investment of well in excess of £120m each year in accurate, impartial and trusted news and current affairs. We ensure that this is available to people through content and services that suit them - broadcast bulletins, long and short form news on ITVX, our youth-focused social media offer *The Rundown*. This offers an important counter to the volumes of mis- and disinformation online. As Ofcom has highlighted in its advice to government on the future of TV distribution, it is increasingly costly for PSBs like ITV to distribute their content via multiple on and offline platforms.

It is vital that in placing the responsibility for media literacy on 'everyone' that Ofcom does not offer an excuse for those most responsible for the harms arising in the first place not to bear the bulk of responsibility for addressing them. We were therefore pleased to see Ofcom acknowledge that *"online platforms have a particular responsibility"* but concerned to see Ofcom's strategy includes *"Exploring how public service broadcasters might address media literacy considerations."*

As set out above, ITV already makes a very significant contribution. PSB is facing an unprecedented scale of challenge, with declines in funding for both publicly- and commercially-funded PSB, and fierce global competition for audiences, advertising and talent, specifically from the online platforms themselves who are driving most of the media related harms. But rather than lean into effective combatting of platform driven disinformation, a platform such as Meta is actually deprioritising news – making it less visible and withdrawing from initiatives globally that might have helped it to flourish in future. Many people would argue that the right starting point to increase media literacy lies in prioritising professionally produced news content from reliable sources within rankings and algorithms on online platforms and recognising the civic importance of that content via fair remuneration for its inclusion.

As has been well documented - by Ofcom, DCMS and others - the sustainability of PSB is under threat. There simply is no excess capacity within the system to take on even more responsibilities - particularly to address harms caused ostensibly by others. We also question why PSBs have been called out specifically, rather than all broadcasters or other media and news organisations (e.g. newspapers groups).

It must be for the major online platforms to shoulder the responsibility for addressing the harms that arise on their platforms. Should Ofcom still envisage an expanded role for PSBs despite the economic challenges facing the sector then such a role would need to be accompanied by proper support and full funding from online platforms and services (or elsewhere) to ensure that UK audiences, licence fee payers and PSBs themselves do not bear the cost for addressing the harms arising from the business models of major global online players.

¹ <https://www.gov.uk/guidance/a-guide-to-the-online-safety-bill>