

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>We broadly agree with Ofcom’s proposals and support this section of its consultation document. We would like to make the following comments:</p> <p><i>Goal One:</i></p> <p>In particular, we support Goal One because it strongly highlights the need to tailor the focus of media literacy initiatives for groups that are more affected by harmful content and activity. As Ofcom notes, different groups are affected by online harms in different ways, depending on factors ranging from gender, age, sexuality, and ethnicity. We support the tailoring of media literacy initiatives depending on the groups targeted, as opposed to a one-size-fits-all approach. This is also something we highlighted in our response to Ofcom’s call for input on the principles for media literacy by design in December 2023.</p> <p>We also welcome the insights-sharing project from Ofcom aimed at first-time voters. This will look at how this group of young people is exposed to mis- and disinformation, and facilitate space to glean an understanding of the challenges they face online and how media literacy can help. This is particularly important when considering that having access to authoritative content is key to making informed decisions in an election.</p> <p><i>Goal Three:</i></p> <p>We are particularly supportive of Ofcom’s intention to share its knowledge on ‘what works’ in its experiences of media literacy delivery. We welcome Ofcom’s proposal for such knowledge-sharing to include the provision of tools and guidance to better equip organisations delivering media literacy interventions, and its specific suggestions to achieve this via workshops and a toolkit. This is essential to help other organisations with fewer resources adapt Ofcom’s learnings and ultimately deliver successful media literacy initiatives. This will also facilitate the sharing of best practices for replication by such organisations, and ultimately result in a net-benefit for the general public by increasing the number of actors in</p>

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	<p>the media literacy space that should lead to higher quality initiatives. For these reasons, we believe that Ofcom is rightly a leader in the area of media literacy, and should indeed be sharing its knowledge on ‘what works’ to other organisations.</p> <p>However, one thing we wanted to point out about Ofcom’s consultation document is that nothing is mentioned about consulting existing research on what has and has not worked in media literacy initiatives that have been carried out by non-Ofcom stakeholders. We would encourage Ofcom to confirm and explicitly set out its intention to consult widely with the existing ecosystem of actors carrying out media literacy initiatives, given the ongoing evolution of media literacy initiatives in the face of new technologies like generative AI.</p> <p>We also wanted to comment on Ofcom’s intention to share knowledge on ‘what works’ in media literacy delivery, by working with specialist teams to optimally sign-post technological solutions like watermarking in its suite of resources for other organisations delivering such interventions. We believe that this could be broadened. While watermarking is a welcome element in the range of technological solutions that exist to enhance media literacy, we would encourage Ofcom to recognise and explicitly set out the need for other organisations to also consider the behaviours that are commonly found to be behind campaigns designed to spread disinformation online.</p> <p>As Ofcom defines ‘media literacy’ as “the ability to use, understand and create media and communications across multiple formats and services”, we interpret that Ofcom’s goal of increasing media literacy levels necessitates increasing the public’s ability to understand communications on services like social media platforms. Therefore, we feel that it is worth including mention of the technological solutions that exist to identify and thereby facilitate awareness of and responses to the tactics, techniques and procedures (TTPs) that are commonly employed in harmful disinformation campaigns online.</p> <p>Ofcom could cite technological solutions that exist to identify such TTPs alongside information on technological solutions like watermarking in its suite of resources</p>

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	<p>for organisations delivering media literacy interventions. In this way, such organisations could be made aware of the means that exist to identify and thereby report on the TTPs that users would benefit from learning more about in improving their media literacy. This would ensure that Ofcom's signposting of potential technological solutions is more comprehensive, and would ultimately serve to increase public awareness of the TTPs employed to disseminate disinformation campaigns and the technological approaches that exist to identify them, thereby increasing their levels of media literacy.</p> <p><i>Indicators of success:</i></p> <p>Lastly, we appreciate that Ofcom has set out a framework based on set out indicators of success (section 2.10) to facilitate the evaluation of Ofcom's media literacy initiatives. However, we would encourage Ofcom to better quantify these indicators of success, so as to facilitate measurement of their impact. For example, it would be helpful for Ofcom to set out the thresholds by which it may consider its media literacy research to be 'highly regarded', and clarify the number of organisations it would consider to constitute a sufficient expansion of its research and stakeholder partners.</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>We broadly agree with Ofcom's proposals and support this section on engaging platforms. We value that Ofcom intends for platforms to assume an active role in promoting media literacy. We welcome that this would include encouraging platforms to evaluate the effectiveness of their media literacy interventions and to share what works with other stakeholders. Platforms play an important role in actioning media literacy initiatives that reach out to millions of users. This is even more important in crucial times like elections. An example of this is the Election hubs that Meta and TikTok populate with authoritative and reliable sources on how to vote whenever an election is taking place. We partnered with TikTok to provide media literacy videos for the <a href="#">UK Elections hub</a> on reading beyond the headlines and lateral reading, among others.</p> <p>We would like to make the following comments:</p>

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	<p>We welcome Goal One, which sets out that Ofcom will encourage platforms to adopt the Best Practice Principles for Media Literacy by Design which were finalised in April 2024. We recall the statement in the Monitoring and Evaluation section thereof that “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.”</p> <p>In response to Ofcom’s call for input on these principles in December 2023, Logically Facts had cited the need for more emphasis on how such effectiveness should be determined in the first place. We called for Ofcom to define in advance how these actions will be evaluated and to encourage the use of similar evaluation standards across online services. We made these arguments because we believe that services should be incentivised to undergo a business and cultural transformation, to see the promotion of media literacy as a ‘must’ and not a ‘nice to have’.</p> <p>Therefore, we welcomed that the finalised principles of April 2024 cite the importance of media literacy outcomes being measured using indicators such as evidence of changes that have taken place as a result of the relevant intervention. We also note Ofcom’s view that the assessment of interventions should rely on measurements that can be broadly benchmarked against other comparable services or online experiences. However, we believe that Ofcom should take on a more direct leadership role in establishing the criteria by which services’ media literacy interventions may be measured and evaluated.</p> <p>In our experience, platforms are transparent about sharing the reach of media literacy content but not the engagement. It is critical to understand how many platform users who see media literacy content actually engage with it. This can be measured by, for example, how long a user watched a media literacy video, and whether they reacted to it or shared it. Platforms must be encouraged to share these metrics to show the true impact and not just the reach of such media literacy initiatives.</p>

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	<p>For this reason, we support Goal Three, which sets out that Ofcom will consider building consensus on best practice principles for media literacy delivery. We strongly encourage Ofcom to undertake this, and to publish another call for input on such best practice principles for media literacy delivery, in the same way as was done for the Best Practice Principles for Media Literacy by Design. In this way, we believe that Ofcom would enhance the latter principles, and ensure both more meaningful initiatives from services and more meaningful outcomes for users. We also believe that this would contribute to Goal Two, whereby Ofcom intends to set out where it thinks platforms could be doing more.</p> <p>Similarly, we believe that Ofcom should play a role in creating a space for these learnings from evaluating the effectiveness of media literacy interventions to also be shared with other platforms, including both the successes and failures. However, achieving this ultimately depends on platforms' willingness to adopt and promote these media literacy initiatives in the first place. Ofcom can only encourage platforms to get on board with the various worthy initiatives enumerated here.</p> <p>For Ofcom to be more effective, a future Government should introduce further powers for Ofcom to enforce and regulate media literacy requirements on platforms to share media literacy interventions, including successes and failures. The previous Government viewed Ofcom's media literacy work as an important element in platforms' overall actions to keep users safe online e.g. from AI-generated content like deepfakes that contain illegal content.<sup>1</sup> We hope that the next administration agrees with the importance placed on media literacy, and therefore seeks to legislate further.</p> <p>Furthermore, we believe that it is essential that platforms develop and fund third-party media literacy projects with organisations that have experience in this field to create this content for their users. Platforms should work with organisations that actively engage in capacity-building endeavours and media-literate individuals with online and in-person training sessions delivered to users.</p>

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<sup>1</sup> Hansard, *Online Safety Bill* Volume 831: debated on Thursday 22 June 2023, Column 443

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	<p>Lastly, we note that platforms invest significant time and resources in their Creators programmes. These programmes are built to develop and engage communities of popular and talented Creators with expansive reach. We believe the platforms should build initiatives that bring together fact-checkers and Creators to find ways to make pre-bunking and media literacy content more impactful. Platforms tend to have separate divisions that work with Creators and fact-checkers, respectively. We would suggest that Ofcom encourages platforms to bring both parties together so as to creatively explore how Creators can serve as a vehicle to amplify fact-checkers' expertise.</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>We agree on the importance of identifying key audiences and geographic areas where media literacy interventions will have the most impact, as opposed to taking a blanket approach. We strongly agree that these training sessions should be done by people within the community or people who have had the same experience that these communities have, as sometimes it is difficult to connect and resonate with the audience if you are seen as an outsider. We believe that the capacity to provide the type of training that these communities need most comes from the ability to optimally assess and define their needs in the first place.</p> <p>We celebrate that Ofcom will work with education departments and regulators in each UK nation to support them in developing media literacy practices in schools, as we believe that media literacy skills play a pivotal role in equipping individuals with accurate information and bolstering their critical thinking abilities to counter the spread of misinformation, particularly for younger children. New generations are being raised in a fully digital culture, which means that they are exposed to online content from a very young age. The National Literacy Trust's report on fake news and critical literacy from 2018 found that only 2% of children in the UK had the critical media literacy skills they need to be able to tell if news is real or fake.<sup>2</sup> That is why we think media literacy training should be compulsory in the educational curriculum in primary schools across the UK. Currently, the system appears to</p>

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<sup>2</sup> National Literacy Trust, *Fake news and critical literacy: final report*, (13 June 2018)

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	<p>rely on the willingness of individual schools and educational leaders to request funding and provide such media literacy education. We would welcome Ofcom taking a more active role in encouraging the implementation of such programmes in schools.</p> <p>We welcome the London School of Economics' (LSE) proposal of a 'Media Literacy Week', as this can boost public awareness on how to critically consume content online and spotlight the skills needed to distinguish between fact from fiction and build public resilience to mis- and disinformation. The LSE report for the Department of Science, Innovation and Technology did not provide significant detail on what this could entail.<sup>3</sup> However, in our view, a national Media Literacy Week that includes organisations launching media literacy campaigns, workshops and events, would be very beneficial in achieving national media coverage, and could garner additional visibility and support from key players online such as online creators and influencers.</p> <p>We also support the proposal to partner with expert organisations in Section 4.13, as we believe that this could facilitate a bridge between expert organisations in the counter-misinformation space and other organisations with less experience. This would create an important space to share knowledge and foster interactions on relevant issues.</p>
<p><b>Question 4:</b> Do you agree with our assessment of the potential impact on specific groups of persons?</p>	<p>N/A</p>
<p><b>Question 5:</b> Do you agree with our assessment of the potential impact of our proposals on the Welsh language?</p>	<p>N/A</p>

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<sup>3</sup> Department of Science, Innovation and Technology, *Cross-sectoral challenges to media literacy: Final Report*, (August 2023)