

Preliminary comments on the draft Strategy's overview

The Media and Information Literacy Alliance (MILA) welcomes the opportunity of responding to Ofcom's draft media literacy strategy. We have listed out thoughts and comments below in the hope that they will be helpful to the elaboration of the strategy. We have not addressed every point but have provided our thoughts to the issues that are most pertinent to us. We do so in the hope of continued, fruitful collaboration between ourselves and Ofcom.

Before we answer the specific questions that Ofcom wishes to see addressed, we would like to comment on elements in the strategy's overview.

Ofcom's definition of media literacy [point 1.4] is clear and succinct, but there is no feel there for the relationship between media and information. Thus although "the ability to use, understand and create media" is hugely important, it is inseparable from the ability to be judicious about the information underlying the media - this view reflects MILA's (and UNESCO's) treatment of media and information literacy as twin concepts. It would be good for the strategy to make that link more clearly. To reinforce this idea, we would argue that "the ability to think critically about media and have access to different perspectives" [point 1.7] is at least as much about information and information sources as about the media which frames and presents the information.

Relatedly, the strategy needs to help ensure that media literacy is understood in the broadest sense. Media literacy is not always well understood, with different players and constituencies may use different terms to refer to it. Getting the terminology right is important if there is to be a better understanding of what media literacy means across society.

We are mindful too that the strategy essentially relates to digital media - but media literacy and thinking critically are also relevant to broadcast and printed media.

The strategy mentions a range of key media literacy players [point 1.6]. We feel that there should be a special reference to the role of public service broadcasters (PSBs). As part of their triple remit to inform, entertain and educate, PSBs can play the role of 'potential trainer' on issues of media literacy empowerment and lifelong education, not just through awareness raising events and campaigns *via* Corporate Social Responsibility, but also, through active engagement with viewers, users and prosumers of TV, radio & streaming content. The BBC does that to an extent through its Bit Size website (e.g. with features such as 'Fake news and me' (<https://www.bbc.co.uk/bitesize/articles/z73kbqt>) and the 'Marianna in Conspiracyland' podcast (<https://www.bbc.co.uk/sounds/brand/m001mssm>)).

Such interventions can have a significant impact during crises. To take an example outside the UK, during the Covid19 pandemic, the Greek ERT SA, the Greek PSB, collaborated with the Hellenic Ministry of Education into offering school courses (units) of the official curriculum as TV programming, reaching the majority of students (who were viewers when schools were closed) as an alternative way of remote teaching. Other ideas could be the offering of special programmes for minors on online well-being and digital citizenship with interactive sessions through specified apps as well as special TV programming for all on how to combat fake news and disinformation, especially during elections campaigns. Another important strand for practising media literacy through PSBs is through making use of their rich audio-visual archives, for school educational projects, such as film-making by students, and as supporting teaching tools cross-curricularly (see Andriopoulou, 2014, <https://www.blod.gr/lectures/dimiourgontas-eikones-kai-ihous-mesa-kai-ekso-apo-tin-sholiki-aithousa/>).

We agree with the proposals and measures put in place by Ofcom [point 1.18] but we would like to stress the importance of ensuring that these are presented to users and viewers in user-friendly, transparent formats.

Question

Your response

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

Confidential? – N
See response below

It would be good to find out more about specific monitoring and measurement indicators [point 2.6]. For instance, Ofcom could explore research methods that incorporate (i) hands-on interviews; (ii) associations with recent outcomes from social and behavioural research; and (iii) organising awareness-raising events and media literacy days / weeks to better inform on research outcomes.

Point 2.6 makes a specific reference to content of democratic importance. Ofcom could usefully consider EU Regulation 2024/900 of the European Parliament and of the Council on the transparency and targeting of political advertising (https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=OJ:L_202400900), which includes specific provisions on media literacy. It is worth quoting article 4 of the Regulation's preamble, which states:

Political advertising can be a vector of disinformation, in particular where the advertising does not disclose its political nature, comes from sponsors outside of the Union or is subject to targeting techniques or ad-delivery techniques. A high level of transparency is necessary inter alia to support open and fair political debate and political campaigns, and free and fair elections or referendums, and to counter information manipulation and interference, as well as unlawful interference, including from third countries. Transparency of political advertising contributes to enabling voters and individuals in general to better understand when they are being presented with a political advertisement, on whose behalf that advertisement is being made, as well as how and why they are being targeted by a provider of advertising services, so that voters are better placed to make informed choices. Media literacy should be supported to help individuals make best use of the transparency of political advertising democracies.

Ofcom might thus consider extending its research to look more broadly at the relationship between ML and citizenship/participation. Ofcom states that it wishes to “explor[e] the insights from our current project with first-time voters”. This is obviously important, but there is a case for broadening such work to draw insights about how media literacy can contribute to the health of democracy across all society, not just young voters. This lies at the heart of the idea of media and information literacy as an empowering concept.

We wonder whether, in terms of boosting its tracker samples [point 2.7], Ofcom might consider reaching UK citizens living abroad.

The strategy talks about [point 2.8] “providing tools and guidance to better equip organisations delivering media literacy interventions to teach critical skills”. That is clearly important, but it leaves open the fundamental question on how these organisations pay for and sustain such delivery programmes. Providing the tools is a vital first step and initiatives such as The Guardian

Foundation do it very well - but inevitably, without ample resourcing, initiatives are fragmented and only touch a tiny proportion of the population.

The same reasoning applies to point 2.9, about the delivery of evaluative tools. The at-scale resourcing and funding of media literacy programmes (as opposed to the funding of small, time-limited projects) arguably lies beyond Ofcom's remit, but the current absence of such support is a serious impediment to achieving Ofcom's laudable aims under this heading.

At the same time [point 2.9] we need far greater understanding of how to evaluate media literacy interventions and the indicators of success in this field. We cannot automatically assume that improving media literacy always leads to positive outcomes: we know that people who spread misinformation are themselves often highly media literate).

Ofcom has linked its evaluation methodology to the theory of change developed at Bournemouth University, and vice versa. MILA provided critical review for this ToC and the alignment with Ofcom. We suggest that this is made a prominent point in the strategy with regards to evaluation.

With regards to indicators of success [point 2.10], it could be useful to include information about the conduct of impact evaluations in databases of media literacy interventions.

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

Confidential? – N
See response below

Generally, much of what the strategy proposes for platforms is couched in terms of encouragement, with no particular obligations. Is this enough? It is all too easy for platforms to pay lip service to what is proposed, and arguably Ofcom recognises this in point 3.5 which states that platform-funded media literacy projects are often characterised by fragile and short-term agreement. We agree that media literacy by design should be a key imperative for platforms - but we ask ourselves whether this can be effectively achieved through gentle encouragement. Ofcom should not only support platforms to integrate media literacy by design, but also get them to adhere to a robust regulatory regime, so that the intersection of technology development, users' media literacies and platform regulation are in cohort in the interests of a cohesive and progressive datafied society.

We would welcome a greater emphasis on sustained collaborative, educational initiatives, built around interactive content, between platforms and other stakeholders, such as the Be Internet Legends collaboration between ParentZone and Google (<https://parentzone.org.uk/beinternetlegends>) [point 3.5]. In light of this, it is important that:

- tech industry initiatives and funding are joined up and coordinated, to ensure that they are not competing, incompatible and/or confusing (there is a debate to be had about which organisation would play the coordinatory role in this context);
- platforms should support independent and quality-controlled media and information literacy initiatives, to avoid the unintended consequence of them funding more in-house

projects that compete with independent initiatives or CSR-style projects that have little impact.

We feel that the strategy would benefit from explicit references to generative AI, with platforms needing to flag AI techniques and content labelling as part of promoting best practice. This should be associated with encouragement of copyright awareness particularly over the use of images and video created by gen-AI. These issues could be included in measures suggested to promote best practice [point 3.7].

Indicators of success [point 3.10], should feature system monitoring and the collection of quantitative data to measure the impact of the interventions of platforms. We would welcome more detail about the sort of metrics that will be used to measure this.

Finally under this heading, social media influencers are not mentioned in the strategy and we feel that It is important to add them as a new diverse target group actively engaged with digital platform's content. The EU Council Conclusions on support for influencers as online content creators, EC/9301/24 (<https://data.consilium.europa.eu/doc/document/ST-9301-2024-INIT/en/pdf>), defines media influencers as online content creators who post content on social media or video-sharing platforms through which they impact society, public opinion and the personal views of their audience, often showcased through their authenticity-based relationship with their audience. Their impact extends beyond their commercial activities, since they can have a powerful influence to shaping beliefs, attitudes and media habits in the digital media ecosystem. In the same context, 'kid-fluencers' (under the age of 18) who as minors themselves, their parents, guardians and other adult caregivers bear an important responsibility for the wellbeing and awareness of responsible online behaviour in online settings.

Question 3: 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.

Confidential? – N
See response below

In the foreword and overview, the strategy recognises the importance of critical thinking, which is a hugely important component of media literacy. It would therefore be good to see an explicit reference to this in the list of topics to be covered in proposed interventions [point 4.10] .

The strategy rightly recognises the crucial role of teachers and educational professionals [point 4.11] - we would strongly suggest including librarians (school librarians and public librarians) to the list of relevant professionals. The real challenge however - which the strategy skirts around - is to secure better integration of media and information literacy in the school curriculum. This requires the strategy to be more explicit about the need to engage with the Department for Education - and more broadly with other Government Departments that have an interest in the area (DCMS and SDIT in particular). In its recent policy briefing (<https://mila.org.uk/influencing-government/>), MILA calls for media and information literacy for every child in every school, and we would like to see that as a target for Ofcom too.

It follows that trainee teachers are a key group to be targeted in order to boost their media literacy skills and their understanding about how to teach this. Research suggests that many

teachers have limited understanding of media and information literacy and greatly overestimate their students' abilities in this area. Significant activities around CPD for teachers (new and existing), but also librarians, would be highly welcome. At the same time, it must be recognised that an emphasis on teacher training (along with train the trainer initiatives) requires schools to have staff and curriculum time – which underlines the importance of Ofcom engaging with DfE. Harnessing the skills and experience of Media teachers would greatly help in this training endeavour. As the MILA policy briefing states:

Teacher training will be needed to renew and upskill teaching for the digital future. We can utilise the skills and experience of education and information professionals already working in schools teaching media studies, ICT, citizenship. They can work with teachers of other subjects, and importantly also with school librarians, to integrate MIL across the curriculum.

Points 4.7 and 4.13 relate to Ofcom's role in fostering partnerships, bringing together stakeholders and coalition-building. This is of obvious relevance to MILA, whose rationale is to act as a facilitator of collaborative activities in the realm of media and information literacy, including advocacy. It is therefore crucial for Ofcom and MILA to develop their existing relationship and work together in this area so as to ensure complementarity and avoid unnecessary overlaps. We hope that in due course and under the terms of this relationship, MILA will be able to develop distinctive roles, perhaps including activities such as kitemarking.

Another obvious strategic partnership is that between Ofcom and DCMS (previously) / DSIT (currently). We note that there have been glitches there in the past, such as shortcomings in the join-up between the funding work of the DCMS/DSIT Media Literacy Taskforce and of Ofcom. Lessons should be learnt from this to help ensure amplification and scale of projects.

We recognise the importance of helping to build media literacy 'by stealth' [point 4.13] which suggests the need for community outreach to a wide range of organisations for which media literacy is not the primary function. This is an integral part of the sort of partnership-building described above, and here too, there is a joint role for Ofcom and MILA, not least in identifying relevant organisations and initiatives.

We are sympathetic to the idea of a Media Literacy Week [point 4.13], but for this to be as impactful as possible, it would be important to align it with the EU Media Literacy Week and UNESCO's global Media and Information Literacy Week. MILA could play a valuable coordinatory role here since we are the UK Chapter of the UNESCO Media and Information Literacy Alliance.

Question 4: Do you agree with our assessment of the potential impact on specific groups of persons?

Confidential? – Y / N

No particular comments

Question 5: Do you agree with our assessment of the potential impact of our proposals on the Welsh language?

Confidential? – Y / N

No particular comments

