

Your response

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| <p>Question 1: 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>stem4 strongly supports the proposals for ‘Research, Evidence and Evaluation’ and more especially Goals 3 & 4. Ofcom’s support for organisations in evaluating the impact of media literacy interventions has been impressive, but perhaps rather limited in reach, so far, and that could be helpfully amplified. Similarly, the many research outputs from Ofcom should really be reaching much wider audiences, and a programme of briefing webinars, and perhaps larger scale conferences would be very helpful. There is a lot of valuable research to absorb and process and Ofcom’s independence lends its research outputs great significance.</p> <p>Having worked on digital inclusion and the importance of digital skills, when it comes to ‘core measures’ for assessing changes in media literacy, stem4 would support a greater emphasis on assessing wider digital skills. Similarly, the ambition of Goal 2, to amplify the voice and testimony of a range of groups is strongly supported. This goal may be enhanced by collaboration with those working on inequalities (such as Local Authorities, or the Office for Health Inequalities and Disparities). This may offer finer-grained insights for targeted interventions than by identifying the groups with protected characteristics. It is worth noting though, the impact of online harms may not always align with offline assessments of inequalities.</p> <p>Goal 3’s plan to help people identify misinformation and disinformation is worthy, but given that research in this area can be hotly contested (https://www.nature.com/articles/d41586-023-02195-3), it may be helpful to promote becoming skilled in identifying good quality information, and ‘psychologically inoculated’ against poor quality information.</p> <p>Finally, in considering Goal 4’s ambition to increase evaluation activity, it may be helpful to embed within this an emphasis on how learning is also transmitted through</p> |

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| | <p>networks, beyond the initial reach of how many people were trained. This is addressed later in the 'People and Partnerships' strategy, where the impact of the 'trusted voice' is highlighted. How learning might be cascaded through networks, to achieve scale, is a good focus for evaluation.</p> |
| <p>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</p> | <p>Confidential? – N</p> <p>stem4 supports the plans to engage industry, with some concerns. Firstly, whilst Ofcom's 'Media Literacy by Design' recommendations do state that initiatives are inclusive, there is risk that some groups may lack recognition. Given that some may not have the cognitive ability to, for example, make use of context information regarding content, any 'media literacy by design' should not increase harms, by placing too great a cognitive burden upon the end user. stem4 recognises the Ofcom commissioned research on these issues (e.g. https://www.nature.com/articles/s41598-023-32962-1) which may inform industry initiatives, and avoid increasing inequalities.</p> <p>stem4 very much agrees that industry funded 'third party media literacy projects' carry risks, not least projects that might overemphasise the role of personal responsibility and the importance of individual behaviour change. We would draw attention to research reported in the BMJ on how the food, tobacco and gambling industries supported the development of training materials that essentially blamed the end user (e.g. https://www.bmj.com/content/381/bmj.p766).</p> <p>Whilst some funding of media literacy programmes may be necessary for the sustainability of the sector, or desirable if users trust platforms, transparency regarding the funding of programmes and some independent review of programmes may offer users protections from risks. Alternative models for industry funding programmes may also be desirable.</p> <p>stem4 welcomes further research on users' expectations of platforms, and how that is balanced with their media literacy. stem4 also welcomes the emphasis on evaluation and on collaboration, as may be seen in the work of</p> |

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| | <p>the Tech Coalition. Yet it is inescapable that qualitative research on user experience will necessarily continue to give context to any initiatives from industry.</p> |
| <p>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.</p> | <p>Confidential? – N</p> <p>stem4 strongly supports the ‘People and Partnerships’ strategy, though recognises that engaging with and supporting ‘trusted voices’ does require substantial resource investment. As suggested earlier, collaboration with those advancing equity in public health may offer some means to manage such investment better. In addition, this may also help to inform which groups are prioritised in the Goal 1 plans, in addition to those listed.</p> <p>We question whether so much emphasis on the education system in Goal 2 should be the priority, given that schools are often already burdened by very many demands, and may not address those vulnerable groups not in mainstream education. Such a focus could detract from partnerships with diverse communities, not connected to the education system.</p> <p>In addition, whilst establishing a ‘media literacy lead’ in all schools may raise the importance of media literacy, it may be better framed as an aspect of safeguarding, and more relatable in terms of an ‘online safety lead’. To advance media literacy, it may be helpful for a media literacy training to become mandatory in many sectors, much as the three levels of Safeguarding Training have become, depending upon role. For example, there are sectors where novel and extreme risks will be detected early (e.g. via Coroner’s Inquests) where advanced media literacy could be highly beneficial.</p> <p>A ‘Media Literacy Week’ may be helpful, but will be in competition with the very many other ‘awareness’ weeks, and could suffer a sort of ‘one and done’ unintended consequence, where it is soon forgotten. Perhaps a week or month on developing digital skills, to advance equity in many communities might be more appealing and engaging?</p> |

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| | <p>stem4 does strongly support Goal 5, as engaging with emerging technologies sooner rather than later does allow for a deeper understanding to develop over time, and their impact upon physical and mental health and development. For example, current concerns regarding Generative AI are trending massively, obscuring the still challenging questions as to the impact and risks of immersive technologies such as the Metaverse; that has not disappeared.</p> |
| <p>Question 4: Do you agree with our assessment of the potential impact on specific groups of persons?</p> | <p>Confidential? – N</p> <p>stem4 strongly supports the use of impact assessments to inform how resources are used, and especially inequality impacts assessments. As before, aligning with other agencies who are advancing equity, such as Local Authorities and Public Health may ensure greater equity. However, as also mentioned before, past research on inequalities and discrimination may not fully address how emerging technologies impact on different groups. In that sense, one omission appears to be that of neuro-diverse individuals, who should not be simply placed within disabilities or cognitive impairments categories.</p> |
| <p>Question 5: Do you agree with our assessment of the potential impact of our proposals on the Welsh language?</p> | <p>Confidential? – N</p> |