



Making Sense of Media
Ofcom
Riverside House
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London SE1 9HA

Dear Ofcom,

We write as two organisations - The End Violence Against Women Coalition and Glitch, who together led campaigning efforts to ensure the Online Safety Act addresses the disproportionate levels of online violence against women and girls¹. This campaigning resulted in a requirement for Ofcom to issue guidance to tech companies on online violence against women and girls (VAWG), which we keenly await the draft of next year.

You will also be aware that both organisations responded to the illegal harms consultation² and are invested in the regulatory regime being as rigorous as possible in holding tech companies accountable for the online abuse that they profit from. We are grateful for the opportunity to respond to this consultation slightly outside of the set deadline.

In tackling VAWG and online gender based violence, it is essential that there is a holistic approach that encompasses tech accountability, perpetrator intervention and survivor support, alongside proactive and high quality prevention. Media literacy is a key part of that primary prevention of VAWG, alongside the tackling of other forms of online abuse, and mis and disinformation. We were disappointed to see this element of the Online Safety Act so curtailed during the progress of the Bill.

The overarching themes of our response include three key strands:

1. **We believe the overall ambition of Ofcom's role in media literacy should be to become a world leader in preventing and reducing online harms.** In particular, this means Ofcom taking an ambitious and proactive strategy to hold media literacy at the heart of its work - building a holistic approach which is consistent across the Online

¹ <https://www.endviolenceagainstwomen.org.uk/93000-people-call-for-the-online-safety-bill-to-address-violence-against-women-and-girls/>

² <https://www.endviolenceagainstwomen.org.uk/ofcom-blocking-a-safer-internet-for-women-vawg-experts-warn/>

Safety Act (OSA)³. This importantly includes building media literacy into OSA codes of practice. As it currently stands, we are disappointed at what seems to be lack of ambition at the heart of the three year strategy, and the absence of detail attached to it. We hope that this approach does not reflect Ofcom's prioritisation and investment in media literacy more widely. It is a fundamental part of tackling all forms of online harm and will have a clear impact on Ofcom's OSA enforcement work if prevention strategies are properly implemented with and by tech companies, as well as by civil society and Ofcom.

We are disappointed at the absence of detail in the strategy as to what will be delivered and the lack of clarity, particularly around its measures of success. Given the focus placed on evaluation within the strategy we would have expected more attention to how the implementation of the strategy itself will be measured and evaluated. The strategy also contains no detail as to the extent of resource attached to it. We would be grateful for this information to be shared, as it is such a significant consideration in its execution and the level of impact that will result.

We are concerned that the language used, particularly in regard to tech companies, is too open to an interpretation that allows the bare minimum to be carried out. Wording such as "encouraging online services to promote" and "exploring the option of building a consensus on best practice" are concerningly light touch and non-committal. As in other areas we strongly caution against an approach that is too minimalist and non-interventionist. Instead we urge Ofcom to be bold and show leadership in this field.

2. **We strongly support Ofcom to be a catalyst and agent of change, not a convener, commentator or encourager.** Whilst we agree that all sectors and players have a role to play in improving media literacy, and should be empowered or held accountable in doing so, we do not agree with the fundamental principle that media literacy "*must be the responsibility of everyone*". The framing of 'responsibility' ignores the power dynamic that exists between vast tech companies that profit from users' data, disinformation and abuse, and the organisations and initiatives seeking to improve the critical thinking and media literacy of the public. For example, the responsibility for media literacy should not be placed on parents/carers or schools to upskill primary school children being exposed to problematic use of AI in EdTech and drawn into addictive functions on platforms. This is against the backdrop of tech companies knowingly driving algorithms and functions to

³ See more on holistic prevention from an intersectional lens here:
<https://podcasts.apple.com/gb/podcast/a-public-health-approach-to-online-abuse-with-seyi-akiwowo/id1510979126?i=1000517682944>

increase their engagement while mining their data and profiting from their use⁴. It cannot be the responsibility of Black women to learn and implement best practice digital safety without acknowledging how misogynoir is built into platform design⁵.

The approach set out appears to work from the basis of a shared investment-shared benefit model but the reality is that tech companies are driven by their bottom line and a media literate population poses a risk to profits. Meta reported \$134 billion dollars revenue for the year ending December 2023, up 16% from the previous year⁶. However the strategy assumes that civil society and the education sector will deliver media literacy initiatives without clear indication of the level of resource available to them and commissioning practices that will be implemented.

This is an opportunity for Ofcom to take an active stance in reshaping relationships between tech and civil society by acknowledging the inequity in who is contributing to harm and who is investing in preventing it. This means that Ofcom should hold tech companies to duties which include standards on investment, partnership, reach and impact of media literacy interventions, not “encourage” them without articulating how Ofcom’s “influence” will be articulated practically.

For media literacy to be taken seriously there needs to be a duty on platforms to provide it, with clear enforcement rules and minimum standards that must be met. Such standards should require independent evaluation. Platforms should feel both incentivized and required to address it.

3. We firmly believe that Ofcom’s ambition should be for everyone to be media literate, which includes understanding how different groups are impacted disproportionately and systemic risks that impact society.

Everyone should have access to the learning and support that fosters and cultivates media literacy⁷, and we welcome Ofcom’s thinking around how to respond to groups who are at disproportionate risk of harm and/or lower media literacy. We caution Ofcom

⁴<https://techlab.webfoundation.org/strategies-for-change/getting-tech-companies-to-address-underlying-structural-problems>

⁵https://glitchcharity.co.uk/wp-content/uploads/2023/07/Glitch-Misogynoir-Report_Final_18Jul_v5_Single-Pages.pdf

⁶<https://investor.fb.com/investor-news/press-release-details/2024/Meta-Reports-Fourth-Quarter-and-Full-Year-2023-Results-Initiates-Quarterly-Dividend/default.aspx#:~:text=Revenue%20%E2%80%93%20Revenue%20was%20%2440.11%20billion,and%20full%20year%202023%2C%20respectively.>

⁷Read more on how to communicate about the importance of media literacy across society here <https://www.penguin.co.uk/books/445484/how-to-stay-safe-online-by-akiwowo-seyi/9780241535219>

against a response that focuses on working with these minoritised groups to protect themselves, rather than a systemic, intersectional approach which embeds literacy on systemic inequities into the strategy for engaging all groups. To underpin this strategy, Ofcom therefore needs to articulate clearly which systemic risks, inequities and inequalities they are holding at the heart of this strategy. This will support Ofcom's commissioning approach, accountability work and communications around this strategy, and most importantly will provide clear basis for evaluation and impact. As part of this there is also a need to provide for disaggregated data to monitor how the strategy impacts on different groups.

We are keen to understand more how Ofcom will ensure it is in the strongest position to evaluate and assess media literacy efforts, and have concerns that there is inadequate understanding of how intersecting inequalities contribute to particular demographics of women and girls being disproportionately targeted. To support this, Ofcom staff should be provided ongoing training on topics such as misogynoir and misogyny, as well as other fundamental concepts to understanding harm against specific groups including racism, islamophobia, antisemitism, ableism, homophobia and transphobia.

In addition to the three main points there are specific areas we will touch on below relating to sections of the strategy.

4. Media Literacy as Perpetrator Intervention

We were pleased to see that Ofcom has a media literacy focus on “*groups disproportionately affected by harm, including women and girls, and help users understand and reduce exposure to mis and disinformation*”. This ‘awareness building’ approach however does not centre the individuals who are causing and creating the harm. It is not about teaching women and girls how to avoid abuse or keep themselves safe⁸ but about addressing the attitudes, behaviours and inequalities across society, such as negligent or bad actor tech that create the conducive context for it to proliferate. This must acknowledge also that groups can both perpetrate and experience online harm.

We welcome that the strategy sets out an intention of:

Exploring why users engage in the perpetration of harmful activity which disproportionately affects women and girls, drawing out media literacy implications about how they understand their actions and their impact online. Understanding how people

⁸ See more on why this needs to change: <https://techlab.webfoundation.org/strategies-for-change/changing-the-narrative-on-ogbv-to-shift-the-onus-away-from-survivors>

get drawn into communities that propagate and promote discriminatory views against women and girls, and understanding how and where these views can be found, is an important first step.

However “exploring” and “understanding” may be an “important first step” but we are far beyond first steps. While it would be sensible to provide an initial baseline of understanding it cannot be the only product of a three year plan. When exploring why users engage in perpetuating harmful activities online Ofcom must delve deeper to understand why they engage in the first place, continue to engage, become more extreme, as well as the role of the platforms in enabling this. Research on this is already happening⁹ (but to be done most effectively tech companies must be willing to share data and information for research purposes).

The need now is to test what works to upskill the men and boys being drawn into these behaviours, and support them in being able to address and challenge drivers to perpetrate and contribute to online VAWG. There is considerable research on the methodology for engaging men and boys in work on gender equality, and excellent work happening at the moment about how to communicate with men and boys effectively about VAWG which should underpin this work. As a regulator Ofcom can play a crucial role in the dissemination of this messaging and ensuring that any ineffective, or unintentionally detrimental framing of messages within media literacy programmes is improved (for example “myth busting” which results in reinforcing the myth)

5. User Empowerment

A core part of media literacy must also be upskilling users in relation to tech platforms business models e.g. user engagement and design features such as algorithms and features. Without this strand of research, Ofcom risks testing solutions and educational interventions that do not empower users to understand how the structure of the platforms they engage with drive them towards perpetuating harmful activities online.

Ofcom’s research has identified that there is a significant gap in understanding as to how users data is used by companies. We are concerned that the stated intention of “*providing evidence of how platforms might address this media literacy gap*” will not go far enough.

Civil society, governments and users themselves have provided “*evidence of how platforms might address this media literacy gap in order to inform platform best practice*” for years, and due to lack of enforcement rules and minimum requirements we have seen little to no progress from almost all companies.

⁹ [Men Who Hate Women | All About Women 2021](https://www.goodreads.com/book/show/48635408-men-who-hate-women)

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6. Funding

While we welcome the indicator “*Platforms’ funding models relating to media literacy interventions delivered by third party organisations evolve to focus on impact, and investments are multi-year*” - success must include an increased level of funding as well as an evolution of that funding. Otherwise, we can assume that Ofcom believes tech companies are currently investing enough in media literacy initiatives.

This should be used as an accountability measure - assessing how much are platforms investing in this work, which platforms are doing the most or the least, the transparency from platforms about how these features are being embedded and what success measures they are using to evaluate them (in the same way civil society is being asked to evaluate its work)

7. The importance of an Intersectional Approach

The strategy sets out an intention of:

Boosting our tracker samples to enable us to listen to different user groups, including those who are disproportionately affected by harmful content and activity, and conduct secondary analysis to gain a deeper understanding of different audiences, including women and girls, and children.

Sharing our understanding of how the issues we address in our research programme make an impact on a range of demographic and geographic groups, particularly targeting protected characteristics

We welcome the recognition of the disproportionate ways particular demographics are targeted and disproportionately impacted by harmful activity and content. However, the strategy does not delineate the interplay between this and the wider regulatory regime. How will this practically be at the heart of the work? An intersectional approach¹⁰ would require putting Black and minoritised women and girls at the centre of the way the work is designed.

Topics to cover in proposed interventions must include misogynoir not just misogyny, as there is a growing amount of evidence of the breadth and depth of this harm, and mitigating harmful content towards racialised and minoritised groups.

8. Impact and Evaluation

¹⁰ <https://www.jstor.org/stable/1229039>

Publishing findings from commissioned media literacy activities seems a key part of Ofcom's strategy. However, we strongly believe Ofcom's role should go beyond reports. We are keen to know how will Ofcom measure the impact of the way it shares findings. There is a need for a communications strategy attached to this work which identifies audiences, ways in which popular culture and collaborations can support dissemination, and ensuring that the best practice approaches and findings are engaging, and effectively promoted, using a range of methods.

Requiring organisations we commission to provide impact and process evaluations which are proportionate to the scale of delivery and contract.

Ofcom should avoid creating additional burden to civil society and delivery organisations on reporting requirements. Organisations have existing impact measurement practices, frameworks and are often already trained specialists in media literacy¹¹. Rather than imposing new additional requirements and frameworks, work with delivery organisations' existing practices. Where processes could be more robust, Ofcom should provide funding for this as part of the commissioning process to support the partnership to develop this. Impact and evaluations must also be centred on making improvements and learning rather than just reporting requirements linked to funding. It should be a circular process so any reporting leads to learning, which there is then the resources to action and improve what is provided and thereby increase impact.

Ofcom could also provide team capacity for these activities to allow delivery partners to be supported. Here we will also note that when referring to the media literacy work of civil society Ofcom has committed to "requiring organisations" to enact certain measures based on commissioning requirements, whereas when referring to platforms themselves they are being "encouraged".

In relation to indicators of success, Ofcom should care about which communities are being reached via media literacy interventions that are commissioned by Ofcom. It is particularly important to understand whether interventions are engaging and having impact in communities that are mostly likely to take part in malicious activity or be the target of it. Given Ofcom has defined 'sharing and publishing' as a key part of the strategy, another success measure must relate to your learnings and recommendations being actioned, funded and promoted by platforms, including by incorporating media literacy interventions into platform design (safety by design).

¹¹ For example, Glitch provides specialist workshops with in-built monitoring, learning and evaluation infrastructure., which includes across participant experience, developing skills and knowledge, supporting wellbeing and safety online and finally empowering behaviour change and action. In our most recent impact report, 96% agreed they had gained more skills to help them be safer and more resilient online, and 98% knew how to best respond if they saw someone else being targeted with online abuse. Find information on our [workshop menu here](#).

The indicator of success - *“Online services measure the impact of their interventions on-platform and share their learnings”* - is worded in a way that gives platforms a way out of reporting actual impact and insights from the work, so they can simply share (high level) “learnings” from the work. It is essential that Ofcom builds into their strategy a profound commitment to increasing transparency and impact on platforms, in the same way the strategy commits to doing so in relation to civil society.

9. Engaging platforms

We welcome Ofcom’s strategic outcomes including a commitment to building longer-term funding for media literacy initiatives. We strongly recommend that “media literacy as part of measures in our online safety codes of practice” should definitely be included. Without including this in the codes of practice, Ofcom risks losing a huge opportunity to engage platforms meaningfully on this and will push the codes into harm response rather than harm reduction, which is a primary aim of the Online Safety Act.

We welcome Ofcom’s commitment for *“media literacy work to be broader in scope and to focus more on best practice, which may go significantly further than the compliance requirements of the services’ online safety duties”*. This is absolutely essential to Ofcom’s role.

We require Ofcom to define and share evidence of impact measurement of its “influence” on tech companies specifically, given the strategy in relation to engaging platforms depends on *“using our influence to encourage platforms to make changes to their products and services informed by users’ expectations”*. In addition, we strongly believe that Ofcom’s “encouragement” of platforms in the strategy completely undermines Ofcom’s role as regulator and weakens the strategy hugely. Rather than encouragement, Ofcom should articulate clearly the multiple levers that will be used to create an ecosystem of requirements, incentives and sanctions to engage platforms over the next three years. These may include activities such as enforcement activities, transparency requirements, celebratory engagements, public campaigns, evidence reports, investment requirements. Understanding what has worked in the past and exactly what Ofcom will implement is essential to the strategy for impact.

The strategy sets out its intention of:

Encouraging online services to promote, support and fund, either directly or indirectly, media literacy skills development for their users and others.

Exploring the option of building a consensus on best practice principles for media literacy delivery.

Building on our feedback about the ambition of the strategy and the tangible impact aims, these proposed activities do not provide any clear way to deliver the goal of “*Work to ensure platforms’ funding of media literacy programmes*”. This part of the strategy seems unclear and undefined. Ofcom’s role in ensuring funding from platforms for this work is integral to the success of the three year strategy overall so this must be more detailed and have a tangible way to achieve this. Ofcom should also consider what the funding should look like, who it should be going to, what transparency requirements should be implemented around the funding and impact measurement requirements.

We are not convinced that “*building a consensus on best practice principles for media literacy delivery*” among platforms is a good use of Ofcom’s resources. This may lead to discussion with platforms without any tangible impact, yet provides them with “activity” to point to if asked what they are doing in relation to media literacy i.e. “safety washing” the harm they create without any making change.

10. Engaging Civil Society

The strategy states that people and partnerships are at the heart of its approach. It talks of “convening” and “forging partnerships”. However what requirements are going to be on platforms to meaningfully engage in this, so to avoid platforms not engaging / sending a representative with no mandate to implement change? This is a recurring issue in this field, and means that the tech companies are not in the room in any meaningful way (and most often just not in the room full stop). It is also essential that Ofcom consider how civil society will be funded to take part in these convenings, otherwise there is a risk of requiring delivery organisations to engage in convenings where they are unpaid and unable to directly engage with platforms.

The strategy states:

Forming relationships with organisations who have trusted relationships with communities who are either not very active online or more likely to inhabit a hostile environment online, for example:

- Organic communities created by and for women and girls. These communities may support others online, tackle online misogyny, or offer support to women and girls who have experienced online gender-based violence and abuse. We would also be keen to amplify the work already being done in these communities.

We ask that Ofcom clarify what is meant by “*forming relationships*” here as civil society organisations need clarity on the way Ofcom will engage, support and have expectations of organisations. We hope to see detail on the commissioning relationship, and any other form of relationship which is being referred to here. We are glad to see acknowledgement of issues with long term funding which are a source of frustration and stress in the violence against women and girls sector, particularly for specialist by-and-for organisations who tend to be more

precariously funded. Lack of clear commissioning practices as included in the strategy can create uncertainty, pressure and lack of strategic alignment which can do a disservice to the beneficiaries of programmes, as well as the committed and dedicated organisation who carry out the work. As well as the detail of the commissioning approach, we would like to understand what Ofcom's strategic position is in relation to these organisations e.g. what is meant by "amplify" here and is that the main strategy? How will the regulator ensure that it is not co-opting work that is being done at a grassroots level?

We note our surprise there is no mention of the Department of Education in this strategy, nor government at all. The DfE in particular with its remit of RSHE is an essential stakeholder in this space and too often we have seen that poor communication between different government departments and independent bodies result in a lack of joined up strategy and policy.

11. Effective use of resource

We would like more information on what resource is attached to each section of the strategy, and the level of investment into the different elements. We urge Ofcom to make this clearer in the published strategy.

In context of the goal of looking at specific issues such as "*the impact on children of 'persuasive design', including functionalities like autoplay and infinite scrolling*", the inclusion of "*this impact could be positive or may contribute to harms*" is shocking given the multiple studies that evidence the harmful impacts of addictive design¹², and we question whether this is an effective use of resource given existing evidence. Is it unclear how the value of this work would be evaluated.

12. Media literacy week

We do not oppose the idea of a media literacy week, however we would like to caution Ofcom against putting resources into a media literacy week rather than building a systemic year-round approach to media literacy. We encourage any thinking which will draw attention to media literacy and its importance however we believe Ofcom's ambition and strategy should first detail the approach to visibility across these years, and then a media literacy week can be considered in context.

As an example of a systemic, year round approach to media literacy (though in this case, specific to schools), Finland's National and Audiovisual Institute (KAVI) and national media education authority coordinate the annual Media Literacy Week; however, media education is

¹² <https://www.theguardian.com/technology/2018/may/08/social-media-copies-gambling-methods-to-create-psychological-cravings>

also incorporated into the school curriculum and even extends to vocational education. The media literacy objectives vary by educational level; for example, in the early years curriculum, digital competence forms part of the goal transversal competencies¹³. Following this, a media literacy module is embedded in secondary education, resulting in a media diploma for students¹⁴. More broadly, online safety is also included as part of health education in the national core curriculum¹⁵.

We look forward to hearing from you in response to the above, and look forward to reading the renewed and strengthened strategy. If you would like to meet to discuss anything we have raised please do get in contact with us.

Yours sincerely,

Andrea Simon, Executive Director, The End Violence Against Women Coalition (EVAW)

Seyi Akiwowo, Founder & CEO, Glitch

¹³ <https://www.oph.fi/en/education-and-qualifications/national-core-curriculum-ecec-nutshell>

¹⁴ <https://edmo.eu/resources/repositories/mapping-the-media-literacy-sector/finland/>

¹⁵ <https://national-policies.eacea.ec.europa.eu/youthwiki/chapters/finland/68-media-literacy-and-safe-use-of-new-media>