

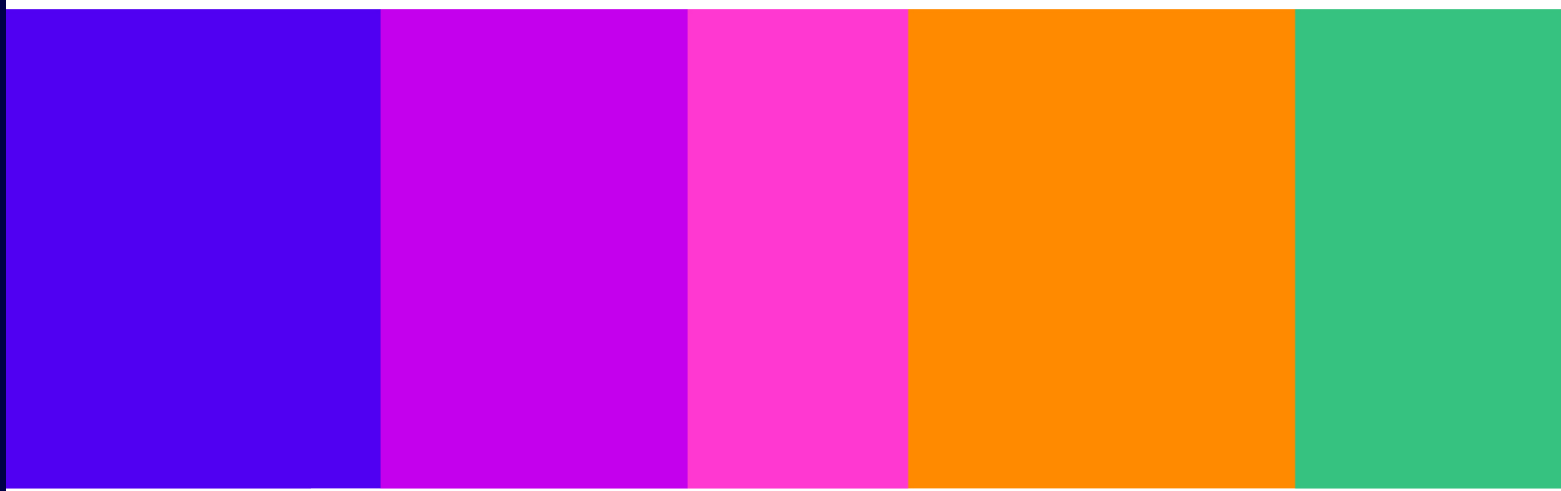
How to Promote Media Literacy

Statement

[Welsh version available](#)

Statement

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1. Introduction

- 1.1 Ofcom has a statutory duty under the Communications Act 2003, updated by the Online Safety Act 2023, to set out Media Literacy Recommendations for online services and others. In this document set out our full considerations in developing the recommendations. This includes feedback from stakeholders, Ofcom’s response and decisions following the September 2025 consultation on [How to Promote Media Literacy](#) which set out our draft Media Literacy Recommendations (‘the draft recommendations’) for online platforms, broadcasters and services. Where we refer to this exercise, we use the term ‘the consultation’. For services adopting these recommendations, we have produced a separate streamlined document, [How to promote media literacy](#), which just sets out the final Media Literacy Recommendations and includes a ‘Questions and Answers’ section.
- 1.2 We have developed recommendations to help a broad range of service providers empower UK citizens, by delivering and promoting media literacy through their products and services. We also encourage service providers to work with supporting programmes that help people develop the skills and information needed to critically and safely engage with content.
- 1.3 In reaching the final recommendations we have also specified the types of service we expect to adopt the recommendations: providers of online, broadcast and other content related services have a particular responsibility and potential to support the population. Online services have high-attention relationships with their users, and public service broadcasters (PSBs) have high-trust relationships with their audiences. This means that while the way they do things may differ, online services and broadcasters are uniquely placed to support the development of media literacy skills for their users and audiences.
- 1.4 These statutory recommendations are non-binding. As a result, service providers can work with us to trial, innovate, and iterate their approach to media literacy. The recommendations provide a framework that supports open dialogue about what works and a participatory approach to regulation, which can lead to better media literacy outcomes across the population. In our view, some service providers can and should do more, hence we have not recommended a standardised approach. Further, public service broadcasters may, over the coming years, need to consider any statutory requirements they may have regarding media literacy.
- 1.5 We received 39 responses to the consultation from a range of interested parties, including online services, broadcasters, trade bodies, civil society, academia, government, and others. Responses not marked as confidential are published on our website. As part of our consultation, we presented the draft recommendations to the Media Literacy advisory panel on 14 Oct 2025, and to attendees at Ofcom’s Media Literacy Conference on 3 December 2025. The feedback received at both events was treated as a secondary source and used to sense-check, contextualise, and add nuance to themes arising from the written responses. Where we refer to this feedback, we do so on a non-attributed basis.
- 1.6 We will be working with and monitoring these sectors closely to see how this approach works, how well and consistently these recommendations are adopted, and evaluate their impacts. Our expectation is that service providers will adopt the recommendations within this document.

The legal basis for this work

- 1.7 Section 11(1) of the Communications Act 2003 (the ‘Act’) places a statutory duty on Ofcom to promote media literacy. Specifically, it requires us, among other things, to take steps to bring about or to encourage others to bring about a better public understanding of the nature of material published by means of electronic media, how it is selected and accessed, and the tools available to control it. It also requires us to encourage the development and use of easy-to-use technology that supports user control over such material published by means of electronic media.
- 1.8 The Online Safety Act 2023 (OSA) provides greater clarity and specificity to our media literacy duties, particularly in relation to regulated online services. Among other things, section 11(1D) of the Act requires us to publish a statement recommending ways in which others might develop, pursue and evaluate activities or initiatives relevant to media literacy in relation to regulated user-to-user and search services.¹
- 1.9 Section 11(1D) focuses specifically on regulated user-to-user and search services, and Section 11(1) relates to electronic media more broadly. Section 11(1E) requires us to publish a statement of recommendations and any revised versions in a manner that ensures that those likely to be affected are made aware of it.

About this document

- 1.10 There are five sections in this document.
- a) Section 1: In this section, we detail what the Statement of Recommendations is, how we consulted on the recommendations, how we reached our decisions and the legal basis for this work. It also contains this section on how to navigate this document.
 - b) Section 2: In this section we detail who the recommendations apply to and why. The recommendations are aimed at a broad range of entities that create and distribute, or enable the creation, hosting, and distribution, of content through broadcast, on-demand and online services, including social media and streaming services. Recommendations 1 to 6 are applicable to all services in scope besides broadcasters, and recommendations 7 to 10 apply to all services and broadcasters. This may change as regulatory requirements evolve. We will keep these recommendations and their applicability under review.
 - c) Section 3: In this section we detail the wording of the 10 recommendations we consulted on, stakeholder feedback, our response to that feedback, and the final recommendations. We have carefully reviewed the consultation responses and have detailed the main points throughout. Each recommendation follows the same format for ease of navigation. In reference to the recommendations consulted on we use the term ‘draft recommendation’, and when referring to the final published Media Literacy Recommendation we use the term ‘final recommendation’.
 - d) Section 4: In this section we detail the ways in which we will implement the recommendations, and again, we detail stakeholder feedback where relevant.
 - e) Section 5: In this section we detail the impact assessment, rights assessment, equality impact assessment and Welsh language assessment.

¹ Section 11(3) of the Act defines “regulated service” as (a) a regulated user-to-user service or (b) a regulated search service, as defined in section 4 of the Online Safety Act 2023.

2. Scope of the Recommendations

2.1 This section sets out our proposals on the scope of the recommendations, feedback from stakeholders, our response and decisions relating to the application of the recommendations.

What we proposed

2.2 In the consultation, we set out proposals regarding who the recommendations should apply to. These proposals are set out in the box below.

Who should follow these recommendations?

The proposed recommendations are aimed at a broad range of entities that enable the creation, hosting, and distribution of content and media that reach significant UK audiences through broadcast, on-demand and online platforms, including social media and streaming services. This unified approach recognises that people switch seamlessly when engaging with analogue and digital content across these services.

Online platforms are the architects of online tools that shape user experiences, and broadcasters are influential sources of news, content and information with the ability to reach more people, which makes them a vital channel for advancing media literacy at scale. Both service providers can achieve more and go further, and we welcome their engagement with these proposed recommendations.

What are we proposing?

We are proposing that service providers act on recommendations in 10 areas set out below. Proposed Recommendations 1-5, and 8-10 are for all services, proposed Recommendation 6 is specific to online platforms and proposed Recommendation 7 is specific to broadcasting and streaming services. Figure 1 presents the high-level recommendations, each of which are supported by more detailed recommendations outlined in Chapter 4.

Targeted Services

The recommendations are aimed at a broad range of entities that enable the creation, hosting, and distribution of content and media that reach significant UK audiences through broadcast, on-demand and online platforms, including social media and streaming services.

- a) User-to-user services like social media, VSPs, forums, messaging apps, online games, and search services;
- b) Broadcasting and streaming services such as the PSBs, including their VoD services, non-PSBs, VoD, including subscription video on demand (SVoD) and ad-supported video on demand (AVoD), free, ad-supported streaming television (FAST) channels, and streaming/online services, including online TV, radio and audio platforms;

- c) Generative AI services, such as chatbots, AI character apps, and audio, image, and video generators, as well as other kinds of generative AI content creation services. These services are reshaping the digital landscape by automating content creation, personalising distribution and enabling more interactive and immersive experiences. These services are well-placed to embed media literacy practices early as the technology continues to develop, and
- d) Other content-focused services that aggregate, distribute and publish content² across a mix of websites, apps, TV, and online platforms to reach audiences. Examples include online intermediaries or online TV platforms. Ongoing shifts in viewing habits and business models towards these and other emerging services, along with those anticipated in the coming years, highlight the growing need for consistent media literacy support, regardless of where or how people access media.

Summary of responses

- 2.3 Most respondents said that it is clear who the recommendations are aimed at, and that they are the right type of organisations.
- 2.4 Some civil society and academia stakeholders said that further services should be included in the scope of the final recommendations, for example:
 - Generative AI services are already described under 'Targeted Services', but they should explicitly be referenced under 'Who should follow the recommendations?' (Ad Association, Internet Matters)³
 - NGOs and charities (the University of Glasgow)⁴
 - Ed-tech AI services (Internet Matters)⁵
 - Cross-sector industry collaborations (FUNdamentally Children)⁶
 - Independent standards bodies (FUNdamentally Children)⁷
 - Mobile operators (Media and Information Literacy Alliance (MILA))⁸
- 2.5 Within the broad agreement, there were some requests for further detail. This included Professor Lee Edwards and Emma Goodman (London School of Economics and Political Science), the Welsh

² Content refers to any form of information, expression, or creative material that is produced and shared for consumption, communication or engagement.

³ [Advertising Association and Media Smart](#), response to the How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services, 2025, pp.1-2; [Internet Matters](#), response to the How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services, 2025, pp.2-3

⁴ [University of Glasgow](#), response to the How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services, 2025, p.1

⁵ [Internet Matters](#), response to the How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services, 2025, pp.2-3

⁶ [FUNdamentally Children](#), response to the How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services, 2025, pp.1-2

⁷ [FUNdamentally Children](#), response, pp.1-2

⁸ [Media and Information Literacy Alliance \(MILA\)](#), response to the How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services, 2025, p.2

Government, the British Film Institute (BFI), and S4C asking for clarity on what constitutes 'significant UK audiences'.⁹

- 2.6 One individual said that the scope of media literacy should be expanded to include audience media production as well as audience media consumption.¹⁰
- 2.7 VoiceBox, Antisemitism Policy Trust and The Economist Educational Foundation also said that further examples of services that are in and out of scope of the recommendations should be added.¹¹
- 2.8 Regarding whether the recommendations should apply to all organisations, most respondents said that the application of the recommendations should be proportionate to the size of an organisation, with some requesting clarity from Ofcom on how proportionality would be applied.
- 2.9 The main reason that stakeholders argued for a proportionate approach was a concern that adopting the recommendations could be burdensome for smaller service providers. For example, REPHRAIN said that smaller service providers could suffer from a lack of resources to implement the recommendations, and MILA said the recommendations should acknowledge that service providers of different sizes will have different resources available.¹² To address this, REPHRAIN said that Ofcom should provide templates or resources to support SMEs in implementation.¹³
- 2.10 A few stakeholders said that stronger accountability should be expected from larger organisations with more resources and reach. Antisemitism Policy Trust, Good Things Foundation, REPHRAIN, and the Advertising Association/Media Smart said that more stringent application of the recommendations should apply to larger or more harmful service providers.¹⁴
- 2.11 Some stakeholders, including the Welsh government and Centre for Protecting Women Online, said that despite proportionality, smaller service providers should still be expected to adopt the recommendations, as a baseline of good practice across all services will help future-proof the ecosystem, and smaller service providers can still have a wide impact.¹⁵

⁹ [Professor Lee Edwards and Emma Goodman \(London School of Economics and Political Science\)](#), response to the How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services, 2025, p.2; The Welsh Government, response to the How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services, 2025; [British Film Institute \(BFI\)](#), response to the How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services, 2025, pp.2-3; [S4C](#), response to the How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services, 2025, p.2

¹⁰ Confidential respondent

¹¹ [VoiceBox](#), response to the How to promote Media Literacy Consultation on recommendations for online platforms, broadcasters and services, 2025, pp.2-3; [Antisemitism Policy Trust](#), response to the How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services, 2025, p.2; [The Economist Educational Foundation](#), response to the How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services, 2025, p.2

¹² [Media and Information Literacy Alliance \(MILA\)](#), response, p.2

¹³ [REPHRAIN](#), response to the How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services, 2025, p.2

¹⁴ [Antisemitism Policy Trust](#), response, p.2; [The Good Things Foundation](#), response to the How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services, 2025, pp.1-2; [REPHRAIN](#), response, p.2; [Advertising Association and Media Smart](#), response, pp.1-2

¹⁵ The Welsh Government response; [Centre for Protecting Women Online](#), response to the How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services, 2025, pp.2-3

- 2.12 Professor Lee Edwards and Emma Goodman (London School of Economics and Political Science) said that all the recommendations should apply to all services, with the caveat that implementation can be tailored to each organisation's focus and capacity. They also said that the scope of Recommendation 6 should be expanded to broadcasters and streamers as well as online platforms.¹⁶
- 2.13 Professor Lee Edwards and Emma Goodman (London School of Economics and Political Science), Mencap and Internet Matters said that the scope of Recommendation 7 should be expanded to encompass all services, rather than just broadcasting and streaming services. Internet Matters said this was important given that social media platforms are the primary source of news for many young people. Mencap said that social media platforms 'help people understand, interpret and assess the credibility of information' through methods such as 'providing a 'fact checker' for content'.¹⁷

Secondary event feedback

Members of our Media Literacy advisory panel said clearer definitions and tighter wording across several recommendations were needed, saying that terms such as “meaningful”, “transparent” and “empower” may otherwise be interpreted inconsistently by industry.

At our conference workshops, participants also said we should refine stakeholder definitions and prioritise engagement across a wider ecosystem - including gaming services, app stores and operating systems, creators and influencers, and advertising supply chains - alongside broadcasters, streamers and social platforms.

Our response

- 2.14 We welcome stakeholders' broad support for the scope of services that we set out in our consultation. We have maintained the broad scope of the recommendations as set out in the 'Targeted services' section of the draft recommendations, however we have amended the applicability of some of the recommendations. Recommendations 1 to 6 are focussed on service design and empowering users. These recommendations are more relevant to online services and content related services that have a high degree of service personalisation. For this reason, these recommendations are less relevant to broadcasters. Recommendations 7 to 10 are focussed on how services can promote media literacy through their content and beyond their service, which are relevant for all services in scope of the recommendations. We have therefore decided that Recommendations 1 to 6 are relevant for online and other content related services, while Recommendations 7 to 10 are relevant for all services in scope. We will review and revise the recommendations, including who they should apply to, in 2029 which will allow us to take into account, amongst other things, changes in technology and service design, as well as any changes to legislation and/or regulation.
- 2.15 We have considered stakeholder feedback that it may not be clear what is regarded as a 'significant UK audience'. Our intention is that these recommendations are widely applicable, and we recognise

¹⁶ [Professor Lee Edwards and Emma Goodman \(London School of Economics and Political Science\)](#), response, p.2

¹⁷ [Professor Lee Edwards and Emma Goodman \(London School of Economics and Political Science\)](#), response, p.2; [Mencap](#), response to the How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services, 2025, p.3; [Internet Matters](#), response, pp.2-3

that boundaries are complex and have limitations. Because the recommendations are non-binding it is not appropriate to establish a new set of scope definitions. We have therefore removed the phrase ‘significant UK audiences’ in the scope of the final recommendations. Our approach will be to work with relevant stakeholders in a collaborative way to ensure there is clarity on how the recommendations apply.

- 2.16 Regarding expanding the scope of media literacy to audience media production as well as consumption, this is already within the scope of our media literacy definition: “the ability to use, understand and create media and communications across multiple formats and services.”
- 2.17 We have not provided further examples of specific service types beyond those already provided in the draft recommendations. These examples are intended to provide a high-level indication of the sort of services that we see as in scope rather than an exhaustive list. Additionally, recognising the pace of change in industry and how relevant services can change and adapt, we have not named specific in-scope service providers in the final recommendations because the recommendations have broad applicability, and such examples may evolve over time.
- 2.18 Regarding proportionality, we agree with stakeholders that the recommendations could be more burdensome for smaller service providers, and that more should be expected from larger service providers with greater reach. Alongside this statement we have published [How to promote media literacy](#) to support services adopting the recommendations. This includes a Questions and Answer section that provides further detail on where we expect larger services to go further in adopting the recommendations than smaller services. This document also signposts service providers to existing Ofcom guidance and resources that can assist with implementation.
- 2.19 Recommendation 6 was developed specifically with online services in mind, where third-party expertise and partnerships play a distinct role in supporting media literacy. These dynamics differ from those of broadcast and IP-first services, whose commissioning models, editorial controls and regulatory frameworks operate in materially different ways. For this reason, we do not consider it appropriate to expand Recommendation 6 to broadcasters or streamers.
- 2.20 We have expanded the scope of Recommendation 7 to include all services in scope. We have also set out how we expect the recommendations to be taken forward by broadcasters in comparison to online services.

Our final decision

- 2.21 Having considered responses from stakeholders, our final updated recommendation text on scope is in the box below.

Scope of Recommendations

The recommendations are aimed at a broad range of service providers that create and distribute, or enable the creation, hosting and distribution, of content through broadcast, on-demand and online services, including social media and streaming services.

Examples of service providers we expect to adopt the recommendations include:

- a) Online services: user-to-user services (such as social media, video sharing platforms (VSPs), forums, messaging apps, and online games) and search services;

- b) Broadcasting and streaming service providers such as public service broadcasters (PSBs) and other broadcasters, including their video on demand (VoD) services, subscription video on demand (SVoD) and ad-supported video on demand (AVoD), free, ad-supported streaming television (FAST) channels, and streaming/online services, including online TV, radio, and audio platforms;
- c) Generative AI services, such as chatbots, artificial intelligence (AI) character apps, and audio, image, and video generators, as well as other kinds of generative AI content creation services. These services are reshaping the digital landscape by automating content creation, personalising distribution and enabling more interactive and immersive experiences. These services are well placed to embed media literacy practices early as the technology continues to develop,¹⁸ and
- d) Other content-focused services that aggregate, distribute, and publish content across a mix of websites, apps, TV, and online services to reach audiences. Examples include online intermediaries and online TV platforms. Ongoing shifts in viewing habits and business models towards these and other emerging services, along with those anticipated in the coming years, highlight the growing need for consistent media literacy support, regardless of where or how people access media.

In this document, ‘online services’ refers to user-to-user and search services. ‘Online and other content related services’ refers to both user-to-user, search, and wider services including generative AI and other content-focused services, but not broadcasters. When referring to ‘all service providers’, this captures the broadest range of services in scope - online, broadcast, and other content-related services.

Some recommendations are more appropriate for different types of organisations. Recommendations 1 to 6 only apply to online and other content related services (not broadcasters), and 7 to 10 are applicable to all service providers, including broadcasters.

The recommendations are non-binding, and we have not set a defined scope for their application. The examples provide clarity on who we expect to adopt the recommendations.

¹⁸ Some generative AI services may be in scope of Part 3 of the OSA and therefore subject to the relevant duties. In November 2024, [Ofcom published an open letter to online service providers operating in the UK about how the OSA will apply to Generative AI and chatbots.](#)

3. The Media Literacy Recommendations

- 3.1 This section covers the Media Literacy Recommendations that we expect stakeholders to adopt. The recommendations are grouped into four categories, as described in the draft recommendations:
 - 1. Design for better user choice (Recommendations 1 to 2)
 - 2. Empower people during use (Recommendations 3 to 6)
 - 3. Build trust beyond the service (Recommendations 7 to 9)
 - 4. Evaluate what works (Recommendation 10)
- 3.2 This section sets out: what our proposed recommendations were under the four categories; summarises how stakeholders responded in the consultation; explains our response to feedback; and then shows the final recommendations.

On Designing for Better User Choice

- 3.3 Recommendations 1 and 2 focus on how service providers can design their services to offer people informed choice and meaningful control from the outset.

Recommendation 1

What we proposed

Draft Recommendation 1: Embed media literacy by design, making inclusive design choices a foundational principle in service architecture and policy

The way that services are designed plays a critical role in shaping user behaviour and building long-term trust. When people understand how a service operates, especially how their data is used and what choices they are making, they are better able to engage meaningfully and responsibly. Inclusive design choices are central to media literacy by design because they ensure those with diverse needs can access services and be empowered to engage with them. This includes children, people with disabilities and those with lower digital confidence.

For example, the case for media literacy by design becomes even more critical when children are likely to use a service. Children interact with services differently from adults and often lack the cognitive maturity (nor should they be expected) to navigate complex privacy settings or persuasive design features.¹⁹ Our research shows that many services do

¹⁹ 5 Rights Foundation sets out a taxonomy of the most commonly used design strategies to influence behaviour on products and services popular among children. Source: 5Rights, 2023, [Disrupted Childhood: The cost of persuasive design](#); 5Rights Foundation, 2023, [Digital Childhood: Addressing childhood development milestones in the digital environment](#). See more information on child behavioural stages in the Recommended age groups section (Section 7.15).

not differentiate between child and adult accounts at sign-up, missing critical opportunities to implement age-appropriate safety and privacy protections.²⁰

We therefore recommend that service providers adopt and publish a ‘media literacy by design’ policy and practice. This should be a living document that evolves in response to user needs and technological change. **We also recommend that, where children are likely to use the service, service providers prioritise age-appropriate design that emphasises simplicity, safety, and clarity in both content and data practices.**²¹ This includes default privacy settings, simplified language, and clear explanations of features tailored to younger audiences.²² Service providers must also consider their obligations under other relevant legislation (please refer to paragraphs 2.11 to 2.15 for additional context).

Summary of responses

- 3.4 There was general agreement on the importance of inclusive and user-centric design from the respondents. Stakeholders provided evidence of how Ofcom could go further with the recommendations on issues such as service responsibility, service design, co-design, harmful design patterns, ages and stages, accessibility, and support for those with additional needs.
- 3.5 Some respondents said that users should not bear sole responsibility for protecting themselves online. REPRHAIN said that there was a need for a balanced approach that recognises both the importance of users' media literacy skills and the role that accessibility plays in enabling empowered use.²³ Three respondents (Molly Rose Foundation, the Welsh Government, Good Things Foundation) said that services should embed media literacy into service design and governance and improve information transparency.²⁴
- 3.6 Stakeholders, such as the Centre for Protecting Women Online, said they welcomed stronger intervention on the design of services.²⁵ The BFI said that services should adopt best-practice architecture with additional support, guidance, or funding, and the Middle Tech Coalition (MTC) agreed that platform design can support media literacy outcomes, but cautioned against prescriptive or mandatory requirements.²⁶ The University of Glasgow said that designing systems that visibly model fair behaviour and clearly explain decisions helps users learn, builds empathy, and encourages people to stand up against harmful behaviour.²⁷

²⁰ Ofcom, [Behavioural Audit of Online Services](#), 2025

²¹ The [ICO's children's code](#) sets out how online services that are likely to be accessed by children should protect children's privacy and personal data online.

²² For example: Ofcom, 2025, [Protecting children from harms online, Volume 4: What should services do to mitigate the risks of online harms to children](#). p.481. 5Rights Foundation, 2021, [Tick to agree: Age appropriate presentation of published terms](#); Designing for Children's Rights, 2022, [Design Principles: Version 2.0](#); Information Commissioner's Office (ICO), 2020, [Age appropriate design: a code of practice for online services](#); IEEE, 2021, [IEEE standard for an age-appropriate digital services framework based on the 5Rights principles for children](#); Save the Children, 2022, [How to write a child friendly document](#).

²³ [REPRHAIN](#), response, p.4

²⁴ [Molly Rose Foundation](#), response, p.5; The Welsh Government response; [Good Things Foundation](#), response, p.2-3

²⁵ [Centre for Protecting Women Online](#), response, p.3

²⁶ [British Film Institute \(BFI\)](#), response, p.5; Middle Tech Coalition (MTC) response to the How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services, 2025

²⁷ [University of Glasgow](#), response, p.2

- 3.7 Some responses, such as from The Good Things Foundation, said that consistency of design between and across services is important, with Parent Zone recommending the development of a pattern library with examples of evidence-based good practice to support such consistency.²⁸ The Economist Educational Foundation said that because of the flexibility in implementation, quality will vary widely, while Pinterest said that it would take a more flexible approach that encouraged the sharing of findings and knowledge across industries.²⁹
- 3.8 Multiple respondents called for more meaningful engagement with users on the design of services. Wikimedia UK, Good Things Foundation, and the Online Safety Act Network (OSAN) all said the recommendations should place greater emphasis on the importance of co-design, updating services with the input of users to ensure they are inclusive and meet the needs of users.³⁰ Good Things Foundation said that co-design was particularly important for underserved groups. Mencap and VoiceBox said that we should go further by also calling for co-production to ensure meaningful research and engagement with user groups throughout.³¹
- 3.9 Some civil society organisations said there should be further attention given to harmful design patterns in the final recommendations. Both Parent Zone and the Molly Rose Foundation said that media literacy by design alone does not disrupt harmful design patterns.³² Internet Matters said that Ofcom should more explicitly address the role of core design features that reduce user agency or impede critical evaluation.³³
- 3.10 Other organisations called for age-appropriate design and called for further clarity on ages and stages. For example, Advertising Association’s Media Smart said this can help children build resilience progressively over time, and Internet Matters asked for examples across different ages and developmental stages.³⁴ Professor Lee Edwards and Emma Goodman from the London School of Economics said there should be a child rights-by-design approach.³⁵ Several stakeholders (Good Things Foundation, Information Integrity Research Network, S4C) suggested using simplified language and clear explanations of features, but said this should go beyond younger users and audiences.³⁶
- 3.11 Some civil society organisations questioned what it means for design to be inclusive and accessible. Mencap said that we should change the wording to ‘inclusive and accessible design’.³⁷
- 3.12 Some civil society organisations highlighted the need for further support for those with additional needs. Mencap said there should be default settings for people with cognitive disabilities, while the Molly Rose Foundation said the recommendations should give greater attention to those with Special Educational Needs and/or Disabilities or SEND.³⁸ The Centre for Protecting Women Online said there should be greater embedding of gender-sensitive safety features and more features

²⁸ [Good Things Foundation](#), response, p.3 ; [Parent Zone](#), response, p. 5

²⁹ [The Economist Foundation](#), response, p.2; [Pinterest](#), response, p. 3

³⁰ [Wikimedia UK](#), response p.3; [Good Things Foundation](#), response p.3, [Online Safety Act Network \(OSAN\)](#), response, p.4

³¹ [Good Things Foundation](#), response, p.3; [Mencap](#), response, p.4; [VoiceBox](#), response, p.2

³² [Parent Zone](#), response, p.5; [Molly Rose Foundation](#), response, p.6

³³ [Internet Matters](#), response, p.7

³⁴ [Advertising Association’s Media Smart](#), response, p.2; [Internet Matters](#), response, p.7

³⁵ [London School of Economics](#), response, p.3

³⁶ [Good Things Foundation](#), response, p. 3; [Information Integrity Research Network](#), response, p.2; [S4C](#), response, p.2

³⁷ [Mencap](#), response, p.2

³⁸ [Mencap](#), response, p.2; [Molly Rose Foundation](#), response, p.11

accounting for intersectional experiences.³⁹ The Middle Tech Coalition (MTC) also said that design should support users with diverse needs, but refrain from mandatory requirements to avoid duplicative compliance burdens.⁴⁰

Secondary event feedback

Members of our Media Literacy advisory panel also supported co-design and strengthening the focus on underserved and diverse audiences. The panel feedback echoed that of the written responses by encouraging us to ensure the recommendations place greater emphasis on designing out risks upfront.

Workshop discussions at our conference similarly supported our recommendations on 'media literacy by design' and asked for clearer articulation of what this entails in practice.

Our response

- 3.13 We welcome the support for inclusive and user-centric design. Ofcom is committed to supporting media literacy by design, and the recommendations have been set at a high level to support a principles-based approach. Our aim through the recommendation is to encourage approaches that balance user agency with meaningful responsibility of online services.
- 3.14 Regarding calls for greater consistency, we want to encourage testing, innovation, and creativity in design approaches, and a standardisation approach risks undermining these outcomes. Allowing for services to align where appropriate but also diverge if better for their users can help future-proof the recommendations as users' needs and services change. However, the [Best Practice Principles](#) encourage participating online services to demonstrate transparency by publishing examples of how they apply the principles of good practice in service design with supervised online services. We invite other services to pledge to adopt the Best Practice Principles.
- 3.15 We agree that co-design and co-production are important, and we have amended Recommendation 9 to make this more explicit, emphasising that service providers should work with underserved audiences to co-design and deliver impactful media literacy interventions.
- 3.16 We acknowledge calls to address harmful design patterns further. Media literacy has a role to play in relation to persuasive design. We have conducted research that provides insight into persuasive design including how design features used by services can negatively impact their users. We have included this research as suggested further reading in relation to Recommendation 1 to encourage services adopting these recommendations to consider the impact of the use of these features on their users.
- 3.17 We agree with stakeholders that age-appropriate design is important to support the media literacy of different ages. Our recommendations are complementary to *Volume 2 of the 'Protecting children from harm online' statement*, which outlines recommended age categories⁴¹ that align with the *ICO age-appropriate design code*.⁴² In addition, we have updated the recommendations to state that online service providers should follow the ICO's statutory age-appropriate design code and its framework for age- and stage-based design, noting the importance of pointing in scope services towards statutory legislation. We also specify the use of clear and simple language for all users in

³⁹ [Centre for Protecting Women Online](#), response, p.3

⁴⁰ Middle Tech Coalition (MTC) response

⁴¹ [Children's Register of Risks](#), Ofcom, p.312

⁴² ICO, 2020, [Age-appropriate design: a code of practice for online services](#).

the recommendation, regardless of age. Beyond this, we do not think it is appropriate to lay out ages and stages in more detail to maintain consistency with our Protection of Children codes, our stakeholders, and other regulatory bodies such as the ICO.

- 3.18 We agree with stakeholders who asked us to change ‘inclusive design’ to ‘inclusive and accessible design’. This will clarify that we want services to make practical and technical adjustments to help those with diverse needs access services and be empowered to engage with them. As stated in the recommendation, we mean this to include children, people with disabilities and those with lower digital confidence.
- 3.19 We agree with stakeholders who argued that services should provide support for those with additional needs. There is already a range of regulatory requirements on online services to provide support for those with additional needs. Providers of regulated services under the OSA must carry out risk assessments that include risks of harm to users with vulnerabilities, including those with disabilities. We consider that these risk assessments and mitigations should be taken into account when providers decide how to present information to users as part of this recommendation, resulting in a better online experience for those with SEND.

Our final decision

- 3.20 Having considered responses from stakeholders, our final updated recommendation text is in the box below.

Final Recommendation 1: Embed media literacy by design, making inclusive and accessible design choices a foundational principle in service architecture and policy

The way that services are designed plays a critical role in shaping user behaviour and building long-term trust.⁴³ When people understand how a service operates, especially how their data is used and the choices they are offered, they are better able to engage meaningfully and responsibly.⁴⁴ Inclusive and accessible design choices are central to media literacy by design because they ensure those with diverse needs can access services and be empowered to engage with them. This includes children, people with disabilities, and those with lower digital confidence.^{45,46}

Media literacy by design becomes even more critical when children are likely to use a service. Children interact with services differently from adults and often lack the cognitive maturity to navigate complex privacy settings or persuasive design features.⁴⁷ Nor should

⁴³ CMA, 2022, [Evidence review of Online Choice Architecture and consumer and competition harm - GOV.UK](#)

⁴⁴ To meet similar aims from a data protection perspective, we recommend viewing the ICO’s [transparency guidance](#) and [data protection by design and default guidance](#)

⁴⁵ Regulated services under the Online Safety Act should consider risks to vulnerable users, including those with disabilities, when conducting their risk assessments. We would expect providers to take into account their risk assessment findings when considering how to present information for such users on their service. See Ofcom [Protecting children from harms online](#), Volume 3, Section 8 for further details.

⁴⁶ Services should also consider their obligations under other relevant legislation (for example, the Equality Act 2010), as well as industry standards and good practice to ensure their services meet the access needs of disabled people. See, for example, ‘WCAG 2 Overview’, 2005. World Wide Web Consortium’s (W3C) Web Content Accessibility Guidelines (WCAG), W3C Web Accessibility Initiative (WAI), March 2024. [See Ofcom Children’s Risk Assessment Guidance, Volume 3, Section 8 for further details.

⁴⁷ 5Rights Foundation sets out a taxonomy of the most commonly used design strategies to influence behaviour on products and services popular among children. Source: 5Rights, 2023, [Disrupted Childhood: The cost of persuasive](#)

they be expected to do so. Our research into online services shows that many do not treat child accounts differently from adult accounts at sign-up, missing critical opportunities to implement age-appropriate safety and privacy protections.⁴⁸

We therefore recommend that service providers adopt and publish a ‘media literacy by design’ policy and practice. This should be a living document that evolves in response to user needs and technological changes. **We also recommend that, where children are likely to use the service, service providers prioritise age-appropriate design that emphasises simplicity, safety, and clarity in both content and data practices.**⁴⁹ This includes key considerations such as default privacy settings, simplified language, and clear explanations of features tailored to younger audiences and other vulnerable groups.⁵⁰ The age and development stages set out in *Volume 2 of the ‘Protecting children from harms online’ statement* identify the following groupings: ages 0-5 as pre-literate and early literacy; ages 6-9 as core primary school years; ages 10-12 as transition years; ages 13 -15 as early teens; and ages 16-17 as approaching adulthood.⁵¹ Services must also consider their obligations under other relevant legislation.

Recommendation 2

What we proposed

Draft Recommendation 2: Offer clear, meaningful choices and transparent information at key points in the service experience

There is a growing body of evidence demonstrating that the way online services design their content and present choices to people shapes how they respond.⁵² Literature demonstrates that behaviour is particularly open to change at key moments in the user journey, such as at sign-up.⁵³ In order for people to be able to take control of their online experiences and the content they consume, they need to be provided with clear information about the content on services at those key moments.

Our research has shown that many online platforms encourage people to accept default settings during sign-up, often without clearly explaining the implications.⁵⁴ This can lead to

[design.](#); 5Rights Foundation, 2023, [Digital Childhood: Addressing childhood development milestones in the digital environment](#). See more information on child behavioural stages in the Recommended age groups section (Section 7.15).

⁴⁸ Ofcom, 2025, [Behavioural Audit of Online Services](#).

⁴⁹ Article 25 of the UK GDPR requires services likely to be accessed by children to take into account children's higher data protection matters. Please see ICO, 2020, [Age-appropriate design: a code of practice for online services](#); and ICO, [Data protection by design and by default](#).

⁵⁰ For example: Ofcom, 2025, [Protecting children from harms online, Volume 4: What should services do to mitigate the risks of online harms to children](#), p.481. Ofcom's Protection of Children Codes of Practice recommend that certain user to user and search services provide age-appropriate user support materials for children and ensure that their terms of service regarding the protection of children are clear and accessible.

⁵¹ Ofcom, 2024, [Protecting children from harms online: Volume 2 The causes and impacts of online harms to children](#)

⁵² CMA, 2022, [Online Choice Architecture: How digital design can harm competition and consumers](#).

⁵³ BIT, 2014, [EAST Framework: Four simple ways to apply behavioural insights](#).

⁵⁴ Ofcom, 2025, [Behavioural Audit of Online Services](#).

confusion, as people may unknowingly agree to settings that affect their privacy, data sharing, or content visibility, without fully understanding the consequences.⁵⁵ In some cases, these default choices may prioritise platforms interests over people’s choices and control, making it harder for individuals to make informed decisions about how their information is used or how content is curated for them. Our research also highlights that people tend to stick with their initial choices at sign-up to a service, making this a vital moment to promote empowered choice.⁵⁶

It is well established that many services use content recommender systems. Recommender systems are technologies that curate and personalise the content served on services. However, it remains unclear how well people who use these services understand how these systems operate, or whether they feel they have meaningful choices or access to transparent information about them.

This lack of clarity can lead to people feeling disempowered or manipulated, particularly if they are unaware of how their data is being used to shape their online experience. It can also contribute to the spread of misinformation, reinforce filter bubbles or limit exposure to diverse perspectives.⁵⁷ Without clear explanations, people are less able to critically engage with the content they see, which undermines media literacy and informed decision-making.

We therefore recommend that service providers clearly inform people, at key moments in the user journey, such as during sign-up or profile creation, about the types of content available on the service (including any potentially sensitive material), as well as the use of recommender systems. This should include clear explanations of what these systems do to help them understand their choices and support informed decision-making. This could be done through, for example, their terms of service, by providing clear onboarding information, through consent and transparency, prompts/reminders or accessible help and settings sections of the service. Service providers must also consider their obligations under other relevant legislation.

People are better able to take control of their online experiences when they understand how recommender systems respond to their behaviours and preferences. However, our research shows that online platform design can sometimes hinder media literacy, particularly when there is a lack of transparency around how results are ranked or how recommender systems operate.⁵⁸ While the recommender system each service uses may vary, it’s helpful for service providers to aid people in understanding what their specific systems do and how they can influence what they see. This includes providing clear,

⁵⁵ CMA, 2022, [Online Choice Architecture: How digital design can harm competition and consumers](#). This report provides evidence that defaults are one of the most powerful tools in online choice architecture, with a 27% increased likelihood of selection when an option is pre-set.

⁵⁶ Ofcom, 2024, [Behavioural insights to empower social media users](#).

⁵⁷ A filter bubble is a personalised digital environment created by algorithmic content curation, where users are predominantly exposed to information that aligns with their previous online behaviour, potentially limiting exposure to diverse viewpoints.

⁵⁸ Ofcom, 2023, Report: [Exploring high media literacy among adults and children](#)

accessible explanations and highlighting the options people have available to influence and curate their personalised content.

We therefore recommend that service providers help users better understand why they are seeing certain content in their feeds, such as by explaining what recommender systems do and how people can influence them.

Summary of responses

- 3.21 Stakeholders, including Internet Matters, Mencap, and Ad Association/Media Smart, said there are potential harms regarding recommender systems and called for algorithmic literacy interventions to inform and empower users.⁵⁹
- 3.22 The Information Integrity Research Network said that more information about algorithms should be available to users, and if a recommender system is optimised for user engagement, service providers should be explicit with users about this.⁶⁰
- 3.23 Some stakeholders said there could be a potential burden of this recommendation on services, such as Impress, who said that it could require large overhauls of technology and take a long time. The British Film Institute (BFI) said Ofcom should provide support to services in adapting their systems to follow this recommendation, and VoiceBox said there should be specific design guidance, such as a one-page summary using plain language and visuals.⁶¹
- 3.24 Some respondents said that the recommendation should go beyond transparency. The Antisemitism Policy Trust said that, despite the recommendation's focus on transparency, it should also mandate strong provenance and metadata for content generated by AI and search services.⁶² Internet Matters and the Molly Rose Foundation said that Ofcom should go further and require online services to reset their algorithmic feeds, so users only see content from accounts they follow. Parent Zone said that services should include slow-down moments for the user to be given important information.⁶³ Dr Elinor Carmi said that people should be able to access exactly what data services hold on them and how it is used.⁶⁴
- 3.25 The Online Safety Act Network (OSAN) and Middle Tech Coalition (MTC) said there is a potential overlap between this recommendation and user empowerment duties, which Category 1 services will be required to implement through the OSA.⁶⁵

Our response

- 3.26 We have added wording that encourages services to explain, in accessible and user appropriate ways, how their recommendation systems work; provide real-time, contextual transparency tools such as concise “why am I seeing this?” explanations; offer service led algorithmic literacy resources, including age appropriate versions for younger users; and collaborate with independent experts to ensure educational materials are accurate, impartial and behaviourally effective. These

⁵⁹ [Internet Matters](#) response, p. 7; [Mencap](#) response, p. 3; [Advertising Association and Media Smart](#) response, p. 5

⁶⁰ [Information Integrity Research Network](#) response, p. 3

⁶¹ [British Film Institute \(BFI\)](#) response, pp. 5-6; [VoiceBox](#) response, p. 6

⁶² [Antisemitism Policy Trust](#) response, p.3

⁶³ [Internet Matters](#) response, p. 7; [Molly Rose Foundation](#) response, p. 8

⁶⁴ [Dr. Elinor Carmi, City St George's University of London](#) response, p. 3

⁶⁵ [Online Safety Act Network \(OSAN\)](#) response, pp. 3-4; Middle Tech Coalition (MTC) response

additions are intended to support a baseline of algorithmic understanding among users, while enabling more informed engagement with personalised feeds.

- 3.27 Regarding whether the recommendation should go beyond transparency, in paragraph 3.26 we say that we have added measures that encourage services to explain, in accessible and user appropriate ways, how their recommendation systems work; provide real-time, contextual transparency tools such as concise “why am I seeing this?” explanations; offer service led algorithmic literacy resources, including age appropriate versions for younger users; and collaborate with independent experts to ensure educational materials are accurate, impartial and behaviourally effective. This is also intended to encourage services to provide users with further support and transparency in relation to personalised feeds in ways we think are meaningful and feasible. However, as these recommendations are non-binding, we are unable to impose specific requirements on services in scope as some stakeholders have requested.
- 3.28 On the potential burden of this recommendation on service providers, we have updated the wording of Recommendation 2 to provide clearer guidance on how those in scope of the recommendation should inform users about the use of recommender systems.
- 3.29 Regarding concerns about links to wider regulatory regimes, some online services will have to comply with extra requirements if they are designated as “categorised services” under the OSA. Such services will be in scope of the upcoming *Additional Duties Code of Practice*. For example, a provider of a service which is designated as ‘Category 1’ will have additional duties relating to user empowerment. This recommendation will complement the *Additional Duties Code of Practice* by recommending that service providers take further actions to offer clear and meaningful choices and transparent information at key points in the service experience. However, this recommendation does not prejudge, supersede or replace those future duties. In addition, we expect a broader set of services (beyond those designated as Category 1 under the OSA) to adopt the recommendations. We have also added a point of clarification, noting that this recommendation builds on top of OSA recommended safety measures to ensure that recommender systems are not pushing harmful content to children.⁶⁶
- 3.30 We also work closely with other regulatory bodies, including the Digital Regulation Cooperation Forum (DRCF) which includes the ICO, the FCA and the CMA, which helps consider how our regulatory approaches can best work together. Through our DRCF partnership, we have consulted with the ICO in particular to clarify references to data protection regulation throughout this Statement.

Our final decision

- 3.31 Having considered responses from stakeholders, our final updated recommendation text is in the box below.

Final Recommendation 2: Offer clear, meaningful choices and transparent information at key points in the service experience

There is a growing body of evidence demonstrating that the way online services design their content and present choices to people shapes how they respond.⁶⁷ Literature demonstrates that users are particularly open to adjusting their settings at key moments

⁶⁶ Ofcom, 2025, [Protection of Children Code of Practice for user-to-user services](#) (PCU E1 and E2).

⁶⁷ CMA, 2022, [Online Choice Architecture: How digital design can harm competition and consumers](#).

in the user journey, such as at sign-up.⁶⁸ In order for people to be able to take control of their online experiences and the content they are seeing at those key moments.

Our research has shown that defaults are widely used by services.⁶⁹ Defaults increase the likelihood of selection when an option is pre-set and people may unknowingly agree to settings that affect their privacy, data sharing, or content visibility, without fully understanding the consequences.⁷⁰ These default choices may prioritise online services' interests over people's choices and control, making it harder for individuals to make informed decisions about how their information is used or how content is curated for them. Our research also highlights that people tend to stick with their initial choices at sign-up to a service, making this a vital moment to promote empowered choice.⁷¹

Many service providers use content recommender systems. Content recommender systems are used to create personalised content feeds on services. However, it remains unclear how well people who use these services understand how these systems operate, or whether they feel they have a choice over the content they see.

This lack of clarity can lead to people feeling disempowered or manipulated, particularly if they are unaware of how their data and behaviour are being used to shape their online experience. It can also contribute to the spread of misinformation, reinforce filter bubbles or limit exposure to diverse perspectives.⁷² Without clear explanations, people are less able to critically engage with the content they see, which undermines informed decision-making and media literacy.

Our research shows that online service design can sometimes hinder media literacy, particularly when there is a lack of transparency around how results are ranked or how recommender systems operate.⁷³ While the recommender systems each service uses may vary, service providers could aid people in understanding what their specific systems do and how they can influence what they see. This includes providing clear, accessible explanations and highlighting the options people have available to influence and curate their personalised content.

We recommend that service providers clearly inform people at key moments in the user journey, such as during sign-up or profile creation, about the use of content recommender systems and how content is recommended to them. This should include clear explanations of what these systems do to help them understand their choices and support informed decision-making. This could be done through, for example, their terms of service, by providing clear onboarding information, through consent and transparency,

⁶⁸ BIT, 2014, [EAST Framework: Four simple ways to apply behavioural insights](#).

⁶⁹ Ofcom, 2025, [Behavioural Audit of Online Services](#).

⁷⁰ CMA, 2022, [Online Choice Architecture: How digital design can harm competition and consumers](#). This report provides evidence that defaults are one of the most powerful tools in online choice architecture, with a 27% increased likelihood of selection when an option is pre-set.

⁷¹ Ofcom, 2024, [Behavioural insights to empower social media users](#).

⁷² A filter bubble is a personalised digital environment created by algorithmic content curation, where users are predominantly exposed to information that aligns with their previous online behaviour, potentially limiting exposure to diverse viewpoints.

⁷³ Ofcom, 2023, [Report: Exploring high media literacy among adults and children](#)

prompts/reminders, or accessible help and settings sections of the service. Service providers must also consider their obligations under other relevant legislation, as this builds on top of expectations to ensure that recommender systems are not pushing harmful content to children.⁷⁴ Further, should future legislative developments introduce additional restrictions or limitations on the use of recommender systems, such provisions take precedence over the recommendations set out in this publication.

We recommend that service providers use the detail in Figure 2 to help users better understand why they are seeing certain content in their feeds and make informed choices.

Figure 2: Further transparency recommendations

Provide clear, accessible explanations of how recommender systems work	Offer real time transparency tools that provide contextual information at the point of interaction	Provide service-led algorithmic literacy resources	Collaborate with independent experts to ensure high-quality, impartial literacy support
<ul style="list-style-type: none"> • Use plain-language, user-facing explanations that avoid technical jargon. • Incorporate visual or interactive explainers showing how different signals (e.g. engagement, follows, watch time) influence recommendations. • Offer a tiered or “layered” information structure, with simple explanations upfront and more detailed information for those who want it. 	<ul style="list-style-type: none"> • Include “why am I seeing this?” prompts with concise, meaningful explanations. • Show which past <u>behaviours</u> or interactions contributed to the recommendation. • Distinguish clearly between recommended content and content that appears due to follows, subscriptions or network connections. 	<ul style="list-style-type: none"> • Offer clear informational materials explaining how recommender feeds work, the potential risks they may pose, and how users can effectively navigate and use the tools available to them. • Provide age-appropriate versions of these resources for different user groups. 	<ul style="list-style-type: none"> • Engage <u>behavioural</u> scientists, media literacy specialists and other experts to strengthen the accuracy, relevance and effectiveness of informational interventions.

⁷⁴ Ofcom, 2025, [Consultation: Online Safety - Additional Safety Measures](#)

On Empowering People During Use

- 3.32 Recommendations 3 to 6 are aimed at empowering people during their active engagement with content and features. By adopting these recommendations, services will help ensure that people are equipped with the knowledge, skills, tools, confidence and support they need to manage their content and media consumption, as well as online interactions effectively.

Recommendation 3

What we proposed

Draft Recommendation 3: Equip people with practical tools to manage and personalise their online experiences

Content management tools are one category of resources available to help people shape their experiences on services. Other tools include screen time prompts, features that flag the tone of comments or question the accuracy of information, and emerging technologies that indicate when content has been generated by AI. Collectively, these tools can play a meaningful role in enhancing media literacy and supporting more informed engagement.

Engaging with content plays a valuable role in people's lives, but many services are designed to maximise engagement, often keeping people online longer than they intend. Time on streaming devices doubled during the pandemic, and Ofcom research shows that social media use among 3- to 5-year-olds has seen a significant increase – driven by a variety of platforms – up from 29% last year to 37%.^{75 76} While time spent online can bring many benefits and is a nuanced issue, features such as autoplay, infinite scroll, and personalised content feeds can lead people to spend more time online than they desire, which can leave people, and in particular children, feeling disempowered when using platforms.

As previously mentioned, behavioural research by Ofcom has found that default settings can be "sticky," meaning that even when prompted, few people move away from the default content control settings.⁷⁷ For children, this stickiness can be beneficial, helping to keep them within safer, higher-privacy settings. However, research into children with high media literacy also shows that some, particularly in gaming contexts, struggle to locate and adjust account settings.⁷⁸ This can prevent people, especially children, from effectively managing their online experiences.

As people are unlikely to organically adjust their settings, we therefore recommend that service providers provide simple, accessible tools for people to be equipped to manage their experiences during use. To support safe and informed choices, service providers should ensure it is easy to turn defaults off – but also to turn them back on again – and should prompt or remind users – especially children – of the option to re-enable

⁷⁵ Ofcom, 2020, [Lockdown leads to surge in TV screen time and streaming.](#)

⁷⁶ Ofcom, 2025, [Top trends from our latest look at the UK's media lives.](#)

⁷⁷ Ofcom, 2024, [Behavioural insights to empower social media users.](#)

⁷⁸ Ofcom, 2024, [Exploring high media literacy among children aged 8-12](#)

protective defaults. Online platforms should make it easy for people to find and adjust these settings by providing clear, straightforward steps that minimise friction and avoid complex or hidden tools. **We recommend that time-management tools be made more visible and accessible so people can manage their time in ways that suit their needs.** Examples of how service providers could improve visibility and accessibility of time management tools include enabling them by default, prompting users at key moments, simplifying their use and providing clear, accessible guidance.

Summary of responses

- 3.33 Most stakeholders were supportive of equipping people with practical tools, particularly by allowing them to set their own privacy settings and exposure to content and features. Stakeholders such as the Council for Countering Online Disinformation (CCOD), VoiceBox and Pinterest said that a focus on content management tools, screen time prompts, and simple and accessible tools was welcomed.⁷⁹
- 3.34 Some stakeholders said that default control settings and accessible and adjustable tools were important. Good Things Foundation said that safety and security by default were important, while also ensuring tools are visible to people so they can effectively manage their screen time.⁸⁰ The Welsh Government said that time management tools should be easy to find and use, and easily adjustable.⁸¹ Mencap said that preferences should be set up at sign up and systems should be designed to be accessible by default.⁸²
- 3.35 Stakeholders said that recommendations should strengthen and add further specificity to time management tools and parental controls. Advertising Association/Media Smart provided examples of how to strengthen recommendations related to time-management tools, such as age-appropriate friction, clearer distinction between active and passive consumption and settings that default to less addictive design patterns for child accounts.⁸³ Internet Matters said that we should actively discourage children from being able to use a service without signing up, as this overrides parental controls. They said that parental controls should function only within authenticated-linked user environments.⁸⁴
- 3.36 Several stakeholders said that tools should be standardised. Parent Zone and VoiceBox said they were concerned by the high number of tools and the cognitive overload that a lack of standardisation can create.⁸⁵⁸⁶ Good Things Foundation said there should be greater consistency in the setting of controls, language, and terminology across services.⁸⁷
- 3.37 Some stakeholders said that Ofcom could go further to establish best practice. Molly Rose Foundation said that any best practice should focus on intended outcomes for users.⁸⁸ Additionally,

⁷⁹ [Council for Countering Online Disinformation](#) response p. 2; [VoiceBox](#), response p. 6; [Pinterest](#) response, p. 4

⁸⁰ [Good Things Foundation](#) response, p. 4

⁸¹ The Welsh Government response

⁸² [Mencap](#) response, p.2

⁸³ [Advertising Association/Media Smart](#) response pp. 3-4

⁸⁴ [Internet Matters](#) response, p. 8

⁸⁵ [Parent Zone](#) response, p. 8

⁸⁶ [VoiceBox](#) response, pp. 6-7

⁸⁷ [Good Things Foundation](#) response, p. 4

⁸⁸ [Molly Rose Foundation](#) response, p. 9

Internet Matters said that the recommendations include a dedicated section on the types of tools and settings those in scope of the recommendation should provide to parents and carers and outline best practice in the design and operation of parental controls.⁸⁹ Dr Craig Haslop, University of Liverpool said those in scope of the recommendation should promote effective reporting systems, for example through promotional campaigns targeted at young people to help them understand what they can report and how.⁹⁰

- 3.38 Some stakeholders said they were concerned about Recommendation 3 being a mandatory requirement. S4C said that they did not intend to implement time-management tools on their VoD service due to Welsh-language content being a unique public service resource.⁹¹ Additionally, Pinterest said they were against mandatory expectations.⁹² However, Pinterest said they were concerned by overly prescriptive expectations and that the recommendations should allow service providers to find solutions that work best for the risks presented on their service.⁹³
- 3.39 Parent Zone said they were against using terms like ‘personalise their online experiences’ due to online services’ use of recommender algorithms.⁹⁴ Internet Matters said that Recommendation 3 should incorporate findings and measures associated with the Protection of Children Codes due to the intention to prioritise parental controls for further consideration.⁹⁵

Our response

- 3.40 We agree with stakeholders that default control settings and accessible and adjustable tools are important. The draft recommendation places emphasis on this and provides examples of how time-management tools can be visible and accessible, which sets out our expectations for services.
- 3.41 With respect to stakeholders’ request for more specificity in the recommendations regarding time management tools, we do not think it is appropriate for Ofcom to recommend specific or standardised tools. However, we have conducted qualitative research on *Persuasive Design and Time Online*.⁹⁶ This research provides some insight into how persuasive design features can keep children online longer than they would like. The document also includes solutions to these concerns that have been suggested by parents and children and Ofcom will be bringing this research to services to discuss its implications for service design.
- 3.42 We agree with stakeholders that there is potential for users to face challenges when they are engaging with a number of different tools across different services. However, as set out in paragraph 3.41, we do not seek to standardise in order to remain consistent with our commitment to encourage testing, innovation, and creativity in design approaches; this allows for scope to future-proof and adapt the recommendations as users’ needs change.⁹⁷ We have therefore not amended the recommendations regarding the standardisation across tools.

⁸⁹ [Internet Matters](#) response, p. 8

⁹⁰ [Dr Craig Haslop, University of Liverpool](#) response, p. 4

⁹¹ [S4C](#) response, p. 3

⁹² [Pinterest](#) response, p. 4

⁹³ [Pinterest](#) response, p.4

⁹⁴ [Parent Zone](#) response, p.8

⁹⁵ [Internet Matters](#) response, p. 8

⁹⁶ Ofcom, 2026, [Exploring the relationship between persuasive design on online platforms, and the time that children spend on them](#)

⁹⁷ Similarly, in Ofcom’s guidance in relation to, [Protecting children from harms online Volume 4](#), when responding to feedback to standardise provision of support information for children, they explained that it is not appropriate for

- 3.43 We acknowledge that stakeholders would like this document to go further to include best practice. As set out in 3.14, we do not think it is appropriate to standardise in order to remain consistent with our commitment to encourage testing, innovation, and creativity in design approaches; this allows for scope to future-proof and adapt the recommendations as users' needs change. However, we agree with stakeholders that establishing best practice is important. A number of online services have pledged to adopt our *Best Practice Principles* which includes social media, search and gaming services, and we are inviting other online services to adopt these. Additionally, as part of our review of these recommendations in three years, we will be reporting on how stakeholders have adopted them which may help to highlight best practice.
- 3.44 A number of stakeholders were concerned that the recommendations are not mandatory. However, the Communications Act 2003 does not empower Ofcom to enforce the Media Literacy Recommendations.
- 3.45 We acknowledge concerns that wording such as “personalise their online experiences” could be misunderstood as referring to online service-driven “personalisation”, including the use of recommender algorithms. In our recommendations, we use “personalise” to describe user-led controls and settings (for example, managing preferences, privacy and safety settings, and content controls), rather than to refer to the way that algorithmic curation by services can personalise content for users. When referring to the latter, we make sure it is clear by referring to recommender systems, and we have maintained this wording in the final recommendations. We recognise that the recommendations, including our recommendations around parental controls, complement the measures in the *Protection of Children Codes of Practice*. We have referenced the Codes in relation to Recommendation 5, which is discussed at paragraph 3.87, as the recommendation explores parental controls in more detail.

Our final decision

- 3.46 Having considered responses from stakeholders, our final updated recommendation text is in the box below.

Final Recommendation 3: Equip people with practical tools to manage and personalise their online experiences

Content management tools are one category of resource available to help people shape their experiences on services. Other tools include screen time prompts, features that flag the tone of comments or question the accuracy of information, and emerging technologies that indicate when content has been generated by AI.

Collectively, these tools can play a meaningful role in enhancing users’ media literacy. For example, time management tools can help users’ navigate services that are designed to maximise engagement which keeps people online longer than they intend.⁹⁸ Ofcom research shows that features such as autoplay, infinite scroll, and personalised content feeds can lead people to spend more time online than they desire, which can leave

Ofcom to recommend a standardised approach due to a lack of evidence of a single best practice approach and services being better placed to determine the most effective way of presenting information on their service, p. 490, Ofcom

⁹⁸ While streamers and PSBs do not generally monetise dwell time in the same way as ad-funded online platforms, engagement remains economically and strategically important, supporting retention, reach, advertising value (for some services), and public value delivery. As a result, many streaming and broadcast VoD services are still designed in ways that encourage prolonged engagement.

people, and in particular children, feeling disempowered when using services.⁹⁹ Additionally, social media use even among children as young as 3- to 5-years old has seen a significant increase – driven by a variety of services – up from 29% (2024) to 37% (2025).^{100 101}

Behavioural research by Ofcom has found that default settings can be "sticky" meaning that, even when prompted, few people move away from the default content control settings.¹⁰²

As people are unlikely to adjust their settings, we recommend that service providers provide simple, accessible tools that equip people to manage their experiences during use.

Recommendation 4

What we proposed

Draft Recommendation 4: Empower people with the knowledge, skills and confidence to understand, interpret and critically assess the credibility of the content they encounter

While many tools already exist to help people manage their online experiences, uptake of these remains low.¹⁰³ Without the relevant knowledge, skills and confidence, people will not be empowered to use them, and these tools risk increasing redundancy.

Ofcom's behavioural audit systematically assessed how design features across six popular services, including one VSP, influenced user behaviour, focusing on sign-up processes, time management tools, sentiment controls, and reporting mechanisms. It found that the majority of online platforms audited offer tools to manage the content users see in their feeds, such as hide, block, dislike, or mute, but these are often difficult to locate or unintuitive to use. Tools such as blocking and reporting are essential for user safety, but poor design can undermine their effectiveness. Stronger tools, like blocking or reporting, frequently require multiple steps, which can discourage use.¹⁰⁴ In addition, poorly designed or unclear systems, such as vague user sanction policies or confusing blocking options, can increase the risk of harm by leaving users uncertain about how to protect themselves.¹⁰⁵

We therefore recommend that service providers actively support users in deploying the tools they have developed, with the necessary skill and confidence. This includes not only making tools more intuitive and accessible but also raising awareness of their existence and providing clear guidance on how to use them effectively. Service providers

⁹⁹ Ofcom, 2026, [Exploring the relationship between persuasive design on online platforms, and the time that children spend on them.](#)

¹⁰⁰ Ofcom, 2020, [Lockdown leads to surge in TV screen time and streaming.](#)

¹⁰¹ Ofcom, 2025, [Top trends from our latest look at the UK's media lives.](#)

¹⁰² Ofcom, 2024, [Behavioural insights to empower social media users.](#)

¹⁰³ Ofcom, 2024, [Behavioural insights to empower social media users.](#) The report shows that only 26% of people say they have ever used content controls offered by social media platforms.

¹⁰⁴ Ofcom, 2025, [Behavioural Audit of Online Services.](#)

¹⁰⁵ Thorn, 2021, [Responding to online threats: minors' perspectives on disclosing, reporting and blocking.](#)

can do this by reducing the steps to access tools and by using simple language and visual prompts to build user confidence.

Looking ahead, the mainstream adoption of AI and the growing presence of AI-generated content will make it even harder for people to understand and control what they see online. As Ofcom’s discussion paper on deepfakes highlights, technologies like watermarking and metadata can help users identify and interpret synthetic media more accurately.¹⁰⁶ **We therefore recommend that service providers provide meaningful context about content and its sources, using tools such as watermarking, metadata, and AI labels, to support informed interpretation and build trust.** Service providers should implement several of these tools, rather than relying on just one, and should continue to invest in research and standardisation to improve how context is provided. While we recognise that some service providers may have limited access to certain forms of context (e.g. metadata), they should nonetheless strive to offer meaningful information wherever possible to aid user understanding.

Ultimately, it is vital that service providers support people in developing the critical thinking skills needed to navigate today’s complex digital landscape. How they empower their users and audiences will be a matter for them and will necessarily include a combination of design, tools, placement and investment in skills development. When done well, this not only empowers individuals but also contributes to a more resilient, informed, and safer digital environment.¹⁰⁷

Summary of responses

- 3.47 Stakeholders were generally supportive of Recommendation 4 and empowering users. Good Things Foundation, Google, S4C, and VoiceBox all supported the recommendation, with VoiceBox noting that proactively raising awareness of tool availability and usage is a vital step forward.¹⁰⁸
- 3.48 Stakeholders highlighted behavioural constraints and the need to consider disproportionately affected groups in tool design. The Information Integrity Research Network said that people, including children, often avoid blocking others out of concern for repercussions. They suggested that services should consider social dynamics, such as making blocking less visible to the blocked party or offering alternative ways to quietly down-rank or hide content and should test tools in realistic social contexts.¹⁰⁹ The Centre for Protecting Women Online said that tools should play a role in creating inclusive and accessible online experiences for women and girls, as they are at a heightened risk of harmful online experiences.¹¹⁰
- 3.49 The growing influence of AI in shaping information environments was raised by stakeholders; however, opinions varied on how AI might affect media literacy. Some online services and trade groups, such as Commercial On-Demand and Broadcasting Association (COBA), said that it is

¹⁰⁶ Ofcom, 2024, [Deepfake Defences: Mitigating the Harms of Deceptive Deepfakes](#)

¹⁰⁷ Ofcom, 2025, [Why all of us need to talk about mis and dis information.](#)

¹⁰⁸ [The Good Things Foundation](#), response, pp.4-5; [Google](#), response, pp.6-7; [S4C](#), response, p.3; [VoiceBox](#), response, pp.7-8

¹⁰⁹ [Information Integrity Research Network](#), response, pp.3-4

¹¹⁰ [Centre for Protecting Women Online](#), response, pp.4-5

important to recognise that AI has benefits, such as enabling content providers and online services to introduce access services cost effectively and efficiently.¹¹¹ Civil society respondents noted potential media literacy challenges associated with AI and called for stricter standards. Antisemitism Policy Trust said there was a risk of inaccurate open-edit sources being used as sources for GenAI Tools on historical events, and the Welsh Government said the risk of inaccuracy in descriptions of historical figures could damage trust in democratic institutions.¹¹² Good Things Foundation said that AI is a significant risk factor because user awareness and understanding of this technology is so low, and that AI literacy, digital literacy, and media literacy are increasingly fundamental in the AI age.¹¹³

- 3.50 Some stakeholders said that there should be further guidelines relating to AI chatbots. VoiceBox said that service providers using chatbots should warn of potential factual inaccuracies and explicitly note risks, such as psychological dependency and broader ethical concerns that may arise from prolonged engagement.¹¹⁴ Molly Rose Foundation said that use of ‘sycophantic prompts’ risks mirroring the beliefs of users and could distort long-term critical thinking. Clear frameworks were recommended by Molly Rose Foundation to remove these features or to offer key functionalities that let users address them, such as optional personalisation and the ability to adjust AI chatbot settings.¹¹⁵
- 3.51 The Online Safety Act Network said that the Online Safety Act does not cover all AI Chatbots.¹¹⁶ The Welsh Government said that online services should ensure they are detecting and flagging harmful content from AI chatbots generated in Welsh.¹¹⁷ Internet Matters said that Ofcom should discourage AI chatbots from allowing users, including children, to access their services without creating an account, as this poses risks for young people due to insufficient supervision. They recommended that Ofcom expand on the tools available to parents and set out clear expectations for parental-control systems, which should function only within authenticated and user-linked environments.¹¹⁸
- 3.52 Some respondents said that services should make it easier for users to identify AI-generated content (often called ‘provenance’ information), with stakeholders providing a range of suggestions regarding which tools are best for users. The Information Integrity Research Network welcomed our proposal that services use watermarking, metadata and AI related labels, and emphasised the need for such explanations to be delivered in short, engaging formats.¹¹⁹ Google described its own approach to provenance, including digital watermarking and metadata, which it says provides users with important context without stifling innovation. However, Google said that providing precise provenance information to indicate whether information is AI-generated may not help users judge the trustworthiness of content, as such information might not always help inform such judgements.¹²⁰

¹¹¹ [COBA](#), response, p.2

¹¹² [Antisemitism Policy Trust](#), response, p.3; The Welsh Government response

¹¹³ [Good Things Foundation](#), response, pp.4-5

¹¹⁴ [VoiceBox](#), response, pp.7-8

¹¹⁵ [Molly Rose Foundation](#), response, pp.5-6

¹¹⁶ [Online Safety Act Network](#), response, p.2

¹¹⁷ The Welsh Government response

¹¹⁸ [Internet Matters](#), response, p.8

¹¹⁹ [Information Integrity Research Network](#), response, pp.3-4

¹²⁰ [Google](#), response, pp.6-7

- 3.53 Antisemitism Policy Trust said that online and AI services should set standards for differentiating and labelling sources by quality, especially for high-harm or historically contested topics. They recommended that service providers provide detailed provenance panels for AI-generated responses, including source type, date, confidence indicators, and flags for manipulated or open-edit sources. Antisemitism Policy Trust said that open-edited sources might not be reliable and that service providers should attach editorial quality badges or disputed content flags to pages or responses that rely heavily on such sources.¹²¹
- 3.54 COBA advised against a general approach to labelling AI content, saying that AI labelling should only be used to target high-risk content with potential for harm and deception.¹²² Pinterest said they favoured an outcomes-based approach to the labelling of AI-generated and AI-modified content, allowing service providers to tailor solutions proportionate to the risks on their specific sites.¹²³ Google said that a working group should be convened to develop general principles for AI labelling, and that any approach should balance improved user understanding with potential risks of “warning fatigue,” where users bypass interventions or migrate to less responsible services.¹²⁴ S4C said tools such as AI labels are more relevant to large online services and that S4C already helps audiences to develop the skills and confidence to understand and interpret content.¹²⁵
- 3.55 Some stakeholders provided suggestions regarding how AI labelling could be implemented. Information Integrity Research Network said that Ofcom should offer guidance to service providers about the scope and implementation of AI labels.¹²⁶ VoiceBox said that service providers should accurately label inserted AI services and provide prominent guidance on the privacy implications for interactions. VoiceBox also said that there were gaps in Ofcom’s guidance for handling AI detection, labelling and transparency, including how service providers should handle evolving detection techniques that bad actors are able to circumvent, how prescriptive AI labels should be, and balancing transparency with preventing the misuse of detection information by AI media creators. VoiceBox said that further technical research was urgently needed to better understand effective labelling standards.¹²⁷
- 3.56 Parent Zone said that, in some cases, AI tools have made user empowerment more difficult and said that Ofcom should provide further detail on the tools that we proposed in Recommendation 4 by giving examples of what is meant under each approach.¹²⁸
- 3.57 Some stakeholders provided more considerations regarding user empowerment. Advertising Association/Media Smart said that Ofcom should consider whether the focus on user empowerment is the right approach to creating healthier media environments, and said that Ofcom should further consider how user protection should be balanced against user agency and exposure to diverse viewpoints.¹²⁹ PayPal said that user empowerment was particularly important in financial

¹²¹ [Antisemitism Policy Trust](#), response, pp.3-4

¹²² [COBA](#), response, p.2

¹²³ [Pinterest](#), response, pp.4-5

¹²⁴ [Google](#), response, pp.6-7

¹²⁵ [S4C](#), response, p.3

¹²⁶ [Information Integrity Research Network](#), response, pp.3-4

¹²⁷ [VoiceBox](#), response, pp.7-8

¹²⁸ [Parent Zone](#), response, p.9

¹²⁹ [Advertising Association and Media Smart](#), response, p.5

contexts, where consumers may benefit from greater transaction transparency, clear consent flows, and tools to protect against scams and misinformation.¹³⁰

Our response

- 3.58 We agree with stakeholders that it is important to consider disproportionately affected groups in tool design. We agree that the effectiveness of tools cannot be assessed in isolation from the social contexts in which they are used, particularly for disproportionately affected groups. We have amended Recommendation 4 to explicitly highlight the need for service providers to further engage and consult with groups who are less likely to use their tools and are at a heightened risk of harmful online experiences.
- 3.59 We agree with stakeholders that generative AI tools represent a growing influence on the information environment and that there is a potential for users to be exposed to risks when using AI chatbots. We have reiterated that generative AI services (including chatbots) are within scope of the recommendations to make it clear that we expect relevant providers to implement these recommendations. We are also continuing to consider risks associated with AI chatbots through our wider work on emerging technologies and media literacy.
- 3.60 We agree with stakeholder feedback that services should provide greater transparency to users in relation to AI-generated and AI-modified content, and information about where this information comes from (provenance information). We have amended our guidance under Recommendation 4 to encourage services to adopt interoperable, tamper-resistant approaches for attaching secure provenance information to digital content.¹³¹ These methods can involve embedding metadata which records key details about how content was created, edited, and distributed, and processes to help detect data tampering (such as digital signatures and online verification tools). Whilst we acknowledge these approaches may be vulnerable to attack by expert bad actors, they should help users to distinguish authentic material from manipulated or synthetic media. As such, despite potential weaknesses, our position is that these tools are proportionate steps for the industry to currently take in supporting users to interpret content in a more informed way.
- 3.61 Regarding stakeholders concern that AI labels may have unintended consequences, we have not been prescriptive in the recommendation regarding what types of content should be subject to AI labels. This is because different kinds of services may need the flexibility to take different approaches to implementing AI labelling mechanisms that best support their users in distinguishing authentic material from manipulated or synthetic material.
- 3.62 We agree with stakeholder feedback that user empowerment needs to be in balance with measures to make services safer, while also ensuring that user agency and the exposure to different views are maintained. These recommendations are not intended to place responsibility for safer online environments on users, nor do they replace other interventions, such as the OSA, that promote safer and more trusted online environments. Their aim is to enhance people's trust and engagement in services by building in protections and transparency, while also supporting wider efforts to build media literacy so people can exercise informed agency. We also recognise that user empowerment will look different for different kinds of services.

¹³⁰ PayPal response to the How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services, 2025

¹³¹ Recommendation 4: Empower people with the knowledge, skills and confidence to understand, interpret and critically assess the credibility of the content they encounter

Our final decision

3.63 Having considered the responses provided by stakeholders, our final updated recommendation text is in the box below.

Final Recommendation 4: Empower people with the knowledge, skills and confidence to understand, interpret and critically assess the credibility of content they encounter

While many tools already exist to help people manage their online experiences, take-up remains low.¹³² Without the relevant knowledge, skills and confidence, people will not be empowered to use them and these tools risk becoming redundant.

[Ofcom's behavioural audit](#) systematically assessed how design features across six popular services, including one VSP, influenced user behaviour, focusing on sign-up processes, time management tools, negative sentiment tools, and reporting mechanisms. It found that the majority of online services audited offer tools to manage the content users see in their feeds, such as hide, block, or report, but that these are often difficult to locate or unintuitive to use. Tools such as blocking and reporting are essential for user safety, but poor design can undermine their effectiveness. These tools frequently require multiple steps to implement, which can discourage use by creating friction.¹³³ In addition, poorly designed or unclear systems, such as vague user sanction policies or confusing blocking options, can leave users uncertain about how to protect themselves.

We recommend that service providers actively support users in deploying the tools they have developed with the necessary skills and confidence. This includes not only making tools more intuitive and accessible but also raising awareness of their existence and providing clear guidance on how to use them effectively. Service providers can do this by reducing the steps to access tools and by using simple language and visual prompts to build user confidence. We expect services to further engage and consult with groups who are less likely to use their tools to understand how to provide appropriate support.

Generative AI is increasingly used to create content that is shared and distributed online. In 2025 Ofcom published *Deepfake Defences 2: The Attribution Toolkit*, which highlighted that technologies such as watermarking and metadata can help users identify and interpret synthetic media more accurately.¹³⁴ **We recommend that service providers provide meaningful context about content and its sources, using tools such as watermarking, metadata and AI labels, to support informed interpretation and build trust.** Service providers should implement several of these tools, rather than relying on just one, and should continue to invest in research and standardisation to improve how context around content is provided.

¹³² Ofcom, 2024, [Behavioural insights to empower social media users](#). The report shows that only 26% of people say they have ever used content controls offered by social media platforms. This research was finalised before either the Protection of Children Codes of Practice, or the Illegal content Codes of Practice came into force. The report recommends, for example, clear reporting mechanisms, and so there may be improvements since this research took place.

¹³³ Ofcom, 2025, [Behavioural Audit of Online Services](#).

¹³⁴ Ofcom, 2024, [Deepfake Defences: Mitigating the Harms of Deceptive Deepfakes](#)

In addition, we encourage service providers to adopt tamper-resistant interoperable approaches for attaching secure provenance information to digital content. These methods can involve embedding metadata that records key details about how content was created, edited and distributed, and processes to help detect data tampering (such as digital signatures and online verification tools). They should help users distinguish authentic material from manipulated or synthetic media and provide accessible cues that support critical media literacy. Ensuring that this provenance information remains intact when content is shared across services will further support user understanding and trust.

We recognise that some service providers may have limited access to certain forms of context (e.g. metadata). They should nonetheless strive to offer meaningful information wherever possible to aid user understanding.

We expect generative AI tools, such as chatbots, to implement these recommendations across their services, especially the recommendations regarding providing meaningful context to users about content and its sources. Providing visible citations to reliable sources in response to user prompts will help to create a more trusted information ecosystem. Ultimately, it is vital that services support people in developing the critical thinking skills needed to navigate the products they provide. How they empower their users and audiences will be a matter for them and will necessarily include a combination of design, tools, placement, and investment in skills development. When done well, this not only empowers individuals but also contributes to a more resilient, informed, and safer digital environment.

Recommendation 5

What we proposed

Draft Recommendation 5: Empower and support parents and caregivers to guide and support younger users in age appropriate and meaningful ways

Online services play a key role in helping to keep children safe online. However, in this context parents and caregivers can also be vital in helping children and young people to learn how to navigate and manage their use of services. All families are different and will approach their experiences on services in diverse ways, with family tools helping them to manage these experiences. While many are concerned about screen time and online behaviours, research consistently shows that they often feel underprepared or unsupported in managing these challenges, despite having a high awareness of the availability of tools.

Our research shows that 93% of parents are aware of tools to support children online, yet only 76% of parents of 3–17-year-olds use at least one. This gap highlights that awareness alone is not enough. Factors such as design, usability and online confidence significantly influence uptake. Our research also shows that built-in parental controls, such as those embedded on devices, are the most commonly used, suggesting that ease of access and

seamless integration are key.¹³⁵ Tools that are difficult to find, configure, or understand may discourage use, even among well-intentioned parents.

Our research tracking also reveals a reactive pattern: the number of parents setting up filters or controls increases after a child encounters harmful content (from 23% to 34%).¹³⁶ This suggests that proactive education and design nudges – targeted at parents and caregivers – could encourage earlier adoption, which may help to prevent these from occurring in the first instance.

We therefore recommend that service providers set strong privacy and safety defaults for child accounts or profiles creation and clearly present parental controls at sign-up and other opportune moments, helping families make informed, safe choices from the outset.¹³⁷ Service providers should ensure that these tools are effective and that parents understand what they can be used for.

Children are also increasingly exposed to the commercial features of the services they use. For example, in-app or in-game purchases can enhance their online experience, which is something many children value and actively seek out. However, without appropriate knowledge and support, children may be vulnerable to financial harms, even in situations where parents or caregivers are comfortable with them accessing paid-for features. This is understandable, as children often lack the financial literacy or life experience to fully grasp the consequences of their spending decisions, nor should they be expected to.

Our research has shown that, some children, especially older teenagers, acknowledged that the excitement lies more in the thrill of the purchase than in the product itself. Parents and some of the oldest children expressed concern that this behaviour could become a gateway to gambling, as young people chase the "purchase high," which encourages continued engagement and spending. The cycle of buying and seeking the next thrill creates an environment where impulsive behaviour and risk-taking are reinforced.¹³⁸

Service providers have a role in helping children and young people to develop their understanding surrounding online monetisation, and how this shapes the digital environment. This will help them develop into more informed and empowered users of technology. **We therefore recommend that service providers ensure transparency around commercial features and costs, with real-time notifications and easy-to-use settings that keep parents and caregivers informed and in control.**

The tools we have been discussing are particularly relevant for parents and caregivers with younger children. However, as children grow older, their digital habits evolve, and while these tools can still play an important role, there is also a growing need for open and

¹³⁵ Ofcom, 2025, [Children and parents: Media Use and Attitudes Report – interactive data](#).

¹³⁶ Ofcom, 2025, [Children and Parents: Media Use and Attitudes Report](#)

¹³⁷ Report by The Insights Family produced for the ICO, 2022, [Understanding Data Protection Attitudes](#). The research found that over 40% of parents/carers ranked "provide a high level of privacy by default" as one of the most important actions platforms should take to safeguard children's data.

¹³⁸ Discovery, 2025, [Persuasive design features and potential child financial harms – qualitative research](#).

ongoing conversations about online life. These discussions can be challenging, as many parents and caregivers feel underprepared. The diversity of parental controls and recommender systems across platforms adds complexity – what works well on one service may not translate to another – requiring a high level of digital literacy and confidence that not all families may possess.

We therefore recommend that service providers engage with and support, through funding and collaboration, expert third parties that can provide tailored guidance to parents and caregivers, both in person and online. We expand on this recommendation below.

Summary of responses

- 3.64 Most respondents agreed that parents and caregivers are critical actors in supporting children’s online safety and media literacy. Parent Zone said parents are essential to helping children navigate online services safely, and S4C said they support the principle of empowering parents and caregivers.¹³⁹
- 3.65 However, many stakeholders said that parents and caregivers can be too overburdened, under-supported and under-skilled to provide effective support to children in their care and that actions to promote awareness alone are insufficient.
- 3.66 Some stakeholders said that parental controls could risk imposing an unmanageable complexity and administrative burden on parents. Respondents (Good Things Foundation, Parent Zone, Advertising Association’s Media Smart, Professor Lee Edwards and Emma Goodman, London School of Economics and Political Science) noted parents often navigate many complex services.¹⁴⁰ Parent Zone highlighted the challenges parents face when navigating their children’s online experiences across multiple services, suggesting that standardising language, labels, and user journeys could reduce overload.¹⁴¹ Professor Lee Edwards and Emma Goodman (LSE) called for cross-industry collaboration to create standardised online experiences and improve media literacy skills.
- 3.67 There was broad support for simple, visible, well-timed parental controls, particularly at sign-up (Parent Zone, Wikimedia UK, the Welsh Government, S4C).¹⁴² However, Media and Information Literacy Alliance (MILA) raised concerns about the lack of clarity around when ‘opportune moments occur’, while Wikimedia UK recommended extending the age at which some services allow children to move away from parental controls.¹⁴³ Information Integrity Network suggested reconsidering the term ‘parental controls’, which can sound restrictive or punitive and may therefore discourage uptake, instead, alternative framings, such as ‘family settings’ or ‘parental support tools’, may better capture the intended empowering role of these tools.¹⁴⁴
- 3.68 VoiceBox said the final recommendations should encourage service providers to support educated parental choice rather than assuming all parents want maximum restrictions. They shared research from their youth consultations, warning that while intentions can be good, intense levels of

¹³⁹ [Parent Zone](#), response, p.9; [S4C](#) response, p. 3

¹⁴⁰ [Good Things Foundation](#), response, p.6; [Parent Zone](#), response, p.9; [Advertising Association’s Media Smart](#), response, p.4; [London School of Economics](#), response, p.3

¹⁴¹ [Parent Zone](#), response, p.9

¹⁴² [Parent Zone](#), response, p.9

¹⁴³ [Media and Information Literacy Alliance \(MILA\)](#), response, p.4; [Wikimedia UK](#), response p.2

¹⁴⁴ [Information Integrity Research Network](#), response, p.4

monitoring can feel like a breach of trust and static settings risk hindering young people's growing independence. Instead, they emphasised revisiting parental controls through ongoing conversations.¹⁴⁵

- 3.69 Some respondents said that existing parental tools are not always effective. Molly Rose Foundation said that some tools fail to reflect real risks or notify parents of harmful activity, calling for outcome-focused standards.¹⁴⁶ VoiceBox said that parental controls may create a false sense of security, which risks leading parents to disengage from active monitoring.¹⁴⁷
- 3.70 Some stakeholders said that services should do more to protect users from spending and commercial harms. Internet Matters, the Welsh Government, and Information Integrity Research Network said that services need to provide clearer, real-time notifications, spending caps on in-app purchases for parents and a better explanation of financial consequences for children.¹⁴⁸ Internet Matters supported real-time notifications on commercial features, becoming a statutory requirement.¹⁴⁹ Professor Lee Edwards and Emma Goodman (London School of Economics and Political Science) and MILA questioned why addictive design and monetisation are not treated with equal regulatory seriousness as gambling.¹⁵⁰
- 3.71 Some stakeholders said that there is a need for shared responsibility, particularly with educators. Good Things Foundation, Parent Zone, Advertising Association's Media Smart, British Film Institute (BFI), and others said that services should provide practical, interactive support for parents and teachers.¹⁵¹ The Council for Countering Online Disinformation said that media literacy should be included in the school curriculum.¹⁵² Pinterest said that media literacy is not the sole responsibility of service providers and requires coordination across civil society and the involvement of parents and caregivers.¹⁵³
- 3.72 Regarding concerns about equity and vulnerability, National Association of Head Teachers (NAHT) and Centre for Protecting Women Online said that parental engagement and controls might not be enough to protect some users, particularly girls, and vulnerable and looked-after children, and instead said that safer baseline service environments were important.¹⁵⁴ Good Things Foundation said that services should co-design parent controls with digitally excluded parents to avoid exacerbating inequalities.¹⁵⁵

Our response

- 3.73 We welcome stakeholders' broad support for our proposal that services do more to empower parents and caregivers. At the same time, we agree that promoting awareness of tools is not enough. Recommendation 5 is intended to complement safer defaults and age-appropriate design

¹⁴⁵ [VoiceBox](#), response, p. 8-10

¹⁴⁶ [Molly Rose Foundation](#), response, p.9

¹⁴⁷ [VoiceBox](#), response, p.10

¹⁴⁸ [Internet Matters](#), response, p. 9; [Information Integrity Research Network](#), response, p. 4-5; the Welsh Government response

¹⁴⁹ [Internet Matters](#), response, p. 9

¹⁵⁰ [London School of Economics and Political Science](#), response, p.3

¹⁵¹ [Parent Zone](#), response, p.8

¹⁵² [Council for Countering Online Disinformation](#), response, p.3-4

¹⁵³ [Pinterest](#), response, p.5

¹⁵⁴ [National Association of Head Teachers \(NAHT\)](#), response, p.5; [Centre for Protecting Women Online](#), response, p.5

¹⁵⁵ [Good Things Foundation](#), response, p.6

by encouraging services to make parental support simple to access and use, and to invest in the guidance and support parents need to use tools effectively and confidently.

- 3.74 We welcome stakeholders' recognition of parents and caregivers as critical to children's online safety and media literacy. We also agree with stakeholders' views that parents are often overburdened and may lack the time, support or skills to make full use of available tools. Recommendation 5 is designed to address this by encouraging services to pair awareness-raising with simpler, more usable support for parents - for example, through the use of default settings, clear onboarding, and tailored guidance - so that parental engagement is enabled rather than assumed.
- 3.75 While we agree that services using a range of different tools can increase complexity and administrative burden, we do not agree that it is appropriate for Ofcom to recommend a standardised approach, as the variety of services in scope means this may not be effective. This is consistent with the risk-based approach position we have taken in our *Statement on Protecting Children from Harm*, which allows services to apply tools they see as appropriate to their users to protect children on their platforms.¹⁵⁶ However, we encourage services throughout the recommendations to reduce friction and complexity wherever possible through clearer language, more consistent labelling, and more intuitive user journeys. We also support cross-sector collaboration through research and our commissioned works, which help improve usability and shared understanding for parents and caregivers.
- 3.76 We agree that parental tools are most effective when they are simple, visible and surfaced at meaningful points such as sign-up and account set-up. However, the most appropriate points for these to be included ('opportune moments') are likely to differ between services and user journeys. We have therefore not provided further detail on opportune moments, which could include, for example, major feature changes, transitions in a child's account, or when risk-related features are first used.
- 3.77 On terminology, we acknowledge that some users might prefer terms such as 'family settings' rather than 'parental controls', which could sound more encouraging and less punitive for some users. However, the term 'parent controls' is a widely used and understood term. We have therefore retained references to 'parental controls' while encouraging services to frame these tools in an enabling and supportive way.
- 3.78 We acknowledge that families will take different approaches and that parents will have different views on the level of restriction that is desirable for their children. Recommendation 5 is intended to support informed, proportionate choices by parents and caregivers, including options that support children's autonomy as they mature, while still enabling appropriate safeguards where needed.
- 3.79 On the effectiveness of tools, we recognise concerns that some existing parental tools may not reliably reflect real-world risks or provide meaningful notifications. Recommendations 4 and 5 state that tools should be effective in practice and understandable to users. At the same time, we are continuing to support the development and sharing of evidence on "What works in delivering media literacy activities", including outcome-focused evaluation and iteration of tools over time.¹⁵⁷

¹⁵⁶ [Protecting children from harms online Volume 4: What should services do to mitigate the risks of online harms to children?](#), Ofcom

¹⁵⁷ Ofcom, 2024, [Making Sense of Media: What works in Media Literacy?](#)

We will continue to promote findings about what works to stakeholders to inform strong media literacy initiatives and interventions, and work closely with stakeholders to understand how they can best adopt the recommendations in ways that work best for their users. More information on this can be found under Section 4: Implementation of the recommendations.

- 3.80 We agree with stakeholders that services can do more to protect users from commercial harms, including in-app purchases and the need for clearer, timely information for parents. Recommendation 5 encourages services to provide transparent explanations of costs and commercial features, with practical controls such as real-time notifications and easy-to-use settings that help parents stay informed and in control. We also note concern regarding addictive design and monetisation, not being treated with the same regulatory seriousness as gambling. While we acknowledge that media literacy is relevant to understanding addictive design and monetisation, regulation in this area sits with the Government. We will continue to consider how these issues intersect with media literacy and online safety protections through ongoing work within Ofcom.
- 3.81 We agree that media literacy is a shared responsibility and does not rest on parents alone. In addition to the responsibilities services' have, educators and trusted intermediaries play an important role in providing practical, interactive support for both parents and children. The Government's Media Literacy Action Plan, *A Safe, Informed Digital Nation*, set out a shared commitment to media literacy across departments, including the Department for Science, Innovation, and Technology (DSIT), the Department for Culture, Media and Sport (DCMS) and the Department for Education (DfE).¹⁵⁸ Further, as media literacy is a devolved policy area, each Home Nation addresses media literacy in different ways within a range of government departments. More information on this can be found under Recommendations 7 to 9.
- 3.82 We recognise the need to avoid over-reliance on parental engagement, particularly for children who may be vulnerable, digitally excluded, or lacking consistent caregiver support. This also supports our view against standardisation. Recommendation 5 is intended to complement, not replace, safer baseline environments and age-appropriate design, and to allow services to innovate with new tools and identify the best approaches that work for their users.
- 3.83 We also agree on the importance of equity, including co-design with digitally excluded parents and underserved groups, to ensure that tools and guidance are accessible and do not inadvertently widen inequalities. We agree that co-design and co-production are important, and we have amended Recommendation 9 to make this more explicit, emphasising that service providers should work with underserved audiences to co-design and deliver impactful media literacy interventions.
- 3.84 On equity and accountability, we recognise that parental controls alone will not be sufficient in protecting users, particularly girls, vulnerable and looked-after children. The recommendations are expected to align with our regulatory codes; therefore, references to the *Protection of Children Codes of Practice* related to parental controls have been added to the final recommendation. We have also updated our '*How to Promote Media Literacy*' publication to include research commissioned by Ofcom to inform the Codes of Practice, which has supported the rationale for the Statement of Recommendations.¹⁵⁹ Additionally, we have referenced requirements from the Codes of Practice to remind services of their Protection of Children duties as they align with the Statement of Recommendations.

¹⁵⁸ [A Safe, Informed Digital Nation](#), Government's Media Literacy Action Plan (2026-2029)

¹⁵⁹ Ofcom, 2025, [Protection of Children Code of Practice for user-to-user services](#)

Our final decision

3.85 Having considered the responses provided by stakeholders, our final updated recommendation text is in the box below.

Final Recommendation 5: Empower and support parents and caregivers to guide and support younger users in age appropriate and meaningful ways

The responsibility of keeping children safe online must fall on the platforms themselves. However, parents and caregivers should be empowered so that they can also help children and young people to learn how to navigate and manage their online experience. All families are different and will approach their experiences on services in diverse ways. While family tools can help to manage these experiences, many parents and caregivers are concerned about their children’s screen time and online behaviours. Research into services shows that parents often feel underprepared or unsupported in managing these challenges.¹⁶⁰

Our research into online experiences shows that 93% of parents are aware of tools to support children online, yet only 76% of parents of 3–17-year-olds use at least one.¹⁶¹ This gap highlights that awareness alone is not enough. Factors such as design, usability, and online confidence significantly influence uptake.¹⁶² Our research also shows that built-in parental controls, such as those embedded on devices, are the most commonly used, suggesting that ease of access and seamless integration are key.¹⁶³ Tools that are difficult to find, configure, or understand may discourage use, even among well-informed parents.

Our research tracking on online services also reveals a reactive pattern: the number of parents setting up filters or controls increases after a child encounters harmful content (from 23% to 34%).¹⁶⁴ This suggests that proactive education and design nudges targeted at parents and caregivers could encourage earlier adoption, which may help to prevent children’s encounters with harmful content in the first instance.

In alignment with the *Illegal Content Codes of Practice* that apply to online services, we recommend that service providers set strong safety defaults for child accounts, and in line with the *ICO’s Children Code*, we recommend strong privacy settings for child accounts.¹⁶⁵¹⁶⁶¹⁶⁷¹⁶⁸ In addition, and as a complement to other measures to protect

¹⁶⁰ Pew Research Centre, 2020, [Parenting Kids in the Age of Screens, Social Media and Digital Devices](#).

¹⁶¹ Ofcom, 2025, [Children and Parents: Media Use and Attitudes Report](#)

¹⁶² Ofcom, 2025, [Children and Parents: Media Use and Attitudes Report](#)

¹⁶³ Ofcom, 2025, [Children and parents: Media Use and Attitudes Report – interactive data](#).

¹⁶⁴ Ofcom, 2025, [Children and Parents: Media Use and Attitudes Report](#)

¹⁶⁵ Ofcom, 2025, [Illegal content Codes of Practice for user-to-user services](#)

¹⁶⁶ This aligns with the principle of data protection by design and by default. Protective settings should be on by default to safeguard users, especially children, in line with the ICO Children’s Code (Standard 7). Defaults set to high privacy ensure the best interests of the child are protected. Services should also make positive nudges to remind children of the benefits of the default settings.

¹⁶⁷ Report by The Insights Family produced for the ICO, 2022, [Understanding Data Protection Attitudes](#). The research found that over 40% of parents/carers ranked “provide a high level of privacy by default” as one of the most important actions platforms should take to safeguard children’s data.

¹⁶⁸ Report by [Ofcom Behavioural Insights to engage children with content controls](#), found that ‘defaults were the strongest driver of safer content choices’, which informed the development of the Protection of Children Codes.

children, we recommend clearly presenting parental controls at sign-up and other opportune moments, helping families make informed, safe choices from the outset.

Service providers should ensure that these tools are effective and that parents understand how they can best be used.¹⁶⁹

Children are also increasingly exposed to the commercial features of the services they use. For example, in-app or in-game purchases can enhance their online experience, which is something many children value and actively seek out. However, without appropriate knowledge and support, children may be vulnerable to financial harms, even in situations where parents or caregivers are comfortable with them accessing paid-for features. This is understandable, as children often lack the financial literacy or life experience to fully grasp the consequences of their spending decisions.

Our research has shown that some children, especially older teenagers, acknowledge that the excitement lies more in the thrill of the purchase than in the product itself. Parents and some of the oldest children expressed concern that this behaviour could become a gateway to gambling, as young people chase the "purchase high," which encourages continued engagement and spending. The cycle of buying and seeking the next thrill creates an environment where impulsive behaviour and risk-taking are reinforced.¹⁷⁰

Service providers have a role in helping children and young people to develop their understanding surrounding online monetisation and how this shapes the digital environment. This will help them become more informed and empowered users of technology. **We recommend that service providers ensure transparency around commercial features and costs, with real-time notifications and easy-to-use settings that keep parents and caregivers informed and in control.**

The tools we have been discussing are particularly relevant for parents and caregivers with younger children. However, as children grow older their digital habits evolve, and while these tools can still play an important role, there is also a growing need for open and ongoing conversations about online life. These discussions can be challenging, as many parents and caregivers feel underprepared. The diversity of parental controls and safety features across services adds complexity – what works well on one service may not translate to another, requiring a high level of digital literacy and confidence that not all families may possess.

We recommend that service providers engage with and support, through funding and collaboration, expert third parties that can provide tailored guidance to parents and caregivers, both in person and online.

¹⁶⁹ In addition, as per the [Issued Protection of Children Code of Practice for user-to-user services](#), PCU F1.3, a provider should make publicly available materials which explain how to block, mute, prevent users commenting on content and how to accept or decline a group chat invite to parents or guardians of children. This should further act to inform parents how to make safe choices.

¹⁷⁰ Discovery, 2025, [Persuasive design features and potential child financial harms – qualitative research](#).

Recommendation 6

What we proposed

Draft Recommendation 6: Empower, engage and enable expert third parties to provide enhanced support, helping to extend the reach and impact of media literacy efforts

Expert third parties play a critical role in supporting the media literacy of the population. These could include, but are not limited to: user advocacy groups like AgeUK, VoiceBox and Mencap; digital inclusion organisations such as The Good Things Foundation and Nominet; family focused not-for-profits like Internet Matters or Parent Zone; those focused on information integrity like Full Fact; grassroots initiatives like Red Chair Highland, ConnectFutures and Mhor Collective; those offering support to educators and professionals like South West Grid for Learning (SWGfL) and those offering educational programmes like Loudmouth and The Guardian Foundation.

These organisations bring a range of strengths and expertise to media literacy: some have deep, on-the-ground knowledge of user needs and community vulnerabilities and are trusted by their audiences, while others offer expertise in specific aspects of media literacy, such as educational or professional support. Some are uniquely positioned as expert voices in online safety or health, parenting young adults and some provide in-person services that build confidence and engagement.¹⁷¹ Their diverse capabilities make them essential partners in reaching and supporting a wide range of audiences.

Online platforms have a powerful role to play in connecting people with the information they need, especially during emergencies or meaningful moments in the user journey. For example, platforms can guide users toward expert third-party resources and authoritative content in ways that make sense for their users. This could include integrating context aware triggers and time-sensitive interventions, such as when users search for or report harmful content, as well as using onboarding flows or help centre materials. Our experience shows that partnerships with organisations that already have expert relationships with target groups are key to effective engagement and response.¹⁷² This approach not only supports immediate information needs but also strengthens users' media literacy by helping them identify credible sources and navigate complex situations with confidence.

We therefore recommend that online platforms explore ways to share timely links to expert third party sources and authoritative content during meaningful moments. This helps people access reliable support and respond confidently.

¹⁷¹ For example, authoritative sources like NHS or WHO which were both used in the pandemic.

¹⁷² Ofcom, 2024, [Listening to experts: mental health and media literacy](#).

Summary of responses

- 3.86 Many stakeholders, including Workers Educational Association (WEA), Good Things Foundation, Pinterest and VoiceBox, said that they agreed with our proposal that third parties play a key role in empowering users with clear and accessible information.¹⁷³
- 3.87 Some respondents said that there should be further additions to this recommendation. Antisemitism Policy Trust and The Welsh Government said that online services should highlight accounts that provide trusted information, particularly during critical incidents.¹⁷⁴ Internet Matters said that Ofcom should expand this recommendation to encourage proactive partnerships that build media literacy skills before harm occurs, rather than just reactive support following harm.¹⁷⁵ British Film Institute (BFI) said that Ofcom should recommend collaboration with educators and public libraries, which hold trusted relationships with families and communities.¹⁷⁶
- 3.88 Some stakeholders raised concerns with this recommendation. Parent Zone said that signposting specific third parties could put additional pressure on their resources. Similarly, Middle Tech Coalition (MTC) said that the burden of this recommendation should not solely be on service providers and that Ofcom should consider how to support coordination across industry and civil society.¹⁷⁷
- 3.89 Wikimedia UK said that, as the charity for open knowledge working across media literacy and information integrity, it should be included in the list of third parties provided in this recommendation.¹⁷⁸

Our response

- 3.90 We agree with the suggestion that online services can do more to elevate trusted sources during critical incidents. Recommendation 6 includes guidance that services provide timely signposting to authoritative information at meaningful moments, which can include emergencies. We encourage services to consider how they surface trusted sources in ways that are context-appropriate and support user understanding.
- 3.91 On the suggestion to encourage proactive partnerships, we consider Recommendation 8 to sufficiently cover this by recommending that service providers actively support media literacy skills development by committing to long-term funding of skills-building programmes through partnerships.
- 3.92 We agree that partnerships can be most effective when they build users' capability and resilience proactively, rather than only being activated in response to harm. Recommendation 6 is intended to support both proactive and reactive approaches, encouraging online and other content-related services to embed signposting and collaboration in ongoing user journeys (for example, onboarding, help and safety flows), as well as at moments of heightened risk.

¹⁷³ [Workers' Educational Association \(WEA\)](#), response to the How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services, 2025, p.2; [Good Things Foundation](#), response, pp.6-7; [Pinterest](#), response, p.6; [VoiceBox](#), response, p.10

¹⁷⁴ [Antisemitism Policy Trust](#), response, p.5; The Welsh Government response

¹⁷⁵ [Internet Matters](#), response, p.9

¹⁷⁶ [British Film Institute \(BFI\)](#), response, p.6

¹⁷⁷ Middle Tech Coalition (MTC) response

¹⁷⁸ [Wikimedia UK](#), response, p.2-3

- 3.93 We welcome stakeholders' comments that emphasised the potential for services to collaborate with educators and public libraries, which are trusted intermediaries with strong community reach. While Recommendation 6 does not prescribe specific partners, we agree that education and library settings can be important delivery channels for media literacy support and can complement online interventions.
- 3.94 We agree that there is a risk that increased signposting by services to third-party organisations could create additional demand and pressure on those organisations. Our intention is not to shift responsibility onto third parties, but to promote partnerships that are properly resourced and sustainable. Therefore, we have removed the list of example third-party organisations in the final recommendations. Where services signpost to external support, they should do so responsibly and, where appropriate, in combination with funding and collaboration that strengthens third parties' capacity.
- 3.95 We note views that effective delivery requires coordination across services, civil society and other stakeholders. While these recommendations are directed at services, we agree that wider collaboration can help reduce duplication and improve coherence across the ecosystem. We will continue to consider how Ofcom can support convening, knowledge-sharing and alignment, in addition to the work we already do through the annual media literacy conference and our network.
- 3.96 We note Wikimedia UK's request to be referenced in the illustrative list of third parties. We have removed the list of example third-party organisations, acknowledging the difficulty of providing a comprehensive list.

Our final decision

- 3.97 Having considered responses from stakeholders, our final updated recommendation text is in the below box.

Final Recommendation 6. Empower, engage, and enable expert third parties to provide enhanced support, helping to extend the reach and impact of media literacy efforts

Expert third parties play a critical role in supporting the media literacy of the population. They bring a range of strengths and expertise to media literacy: some have deep, on-the-ground knowledge of user needs and community vulnerabilities and are trusted by their audiences, while others offer expertise in specific aspects of media literacy, such as educational or professional support. Some are uniquely positioned as expert voices in online safety, health or parenting young adults, and some provide in-person services that build confidence and engagement.¹⁷⁹ Their diverse capabilities make them essential partners in reaching and supporting a wide range of people.

Online services have a powerful role to play in connecting people with the information they need, especially during emergencies or meaningful moments in the user journey. For example, services can guide users toward expert third-party resources and authoritative content in ways that make sense for their users. This could include integrating context-aware triggers and time-sensitive interventions, such as when users search for or report

¹⁷⁹ For example, authoritative sources like NHS or WHO which were both used in the pandemic.

harmful content, as well as using onboarding flows or help centre materials.¹⁸⁰ Our experience shows that partnerships with organisations that already have expert relationships with target groups are key to effective engagement and response.¹⁸¹ This approach not only supports immediate information needs, but also strengthens users' media literacy by helping them identify credible sources and navigate complex situations with confidence.

We recommend online and other content related services explore ways to share timely links to expert third party sources and authoritative content during meaningful moments. This helps people access reliable support and respond confidently.

On Building Trust Beyond the Service

3.98 Recommendations 7 to 9 are focused on encouraging services to contribute to media literacy more broadly, including through partnerships and outreach beyond their own service.

Recommendation 7

What we Proposed

Draft Recommendation 7: Help people understand, interpret, and assess the credibility of information by creating and/or promoting relevant programming or educational content

Broadcasting and streaming services have the ability to reach large audiences through a range of interventions, including educational initiatives, online resources, and programming that supports critical engagement with content. With their wide reach, they are well-placed to support parents, caregivers, and third-party organisations in promoting media literacy. This is particularly the case for PSBs due to their trusted relationships with their audiences.

In section 6 of the PSMR, we emphasised PSBs need to invest in media literacy in the UK and called on them to build on existing work.¹⁸² We highlighted their distinctive and trusted relationship with audiences as a key asset in helping people build confidence in navigating digital environments. We also noted that PSBs and large commercial broadcasters could have a role to play in supporting users to understand how to use tools to curate their content feeds.¹⁸³ We highlighted examples of media literacy activity from PSBs and Sky. This included educational initiatives such as workshops for young people, online resources like quizzes and interactive content, and the integration of topical themes into a wide range of programming, from magazine shows to dramas and soap

¹⁸⁰ In addition, as per the [Issued Protection of Children Code of Practice for user-to-user \(U2U\) services](#), PCU F2 recommends that certain U2U services should provide children with information when they restrict content or interactions with other accounts. Furthermore, PCU F3-F5 recommend that certain U2U services signpost children to support when they report, post/repost or search for harmful content.

¹⁸¹ Ofcom, 2024, [Listening to experts: mental health and media literacy](#).

¹⁸² Ofcom, 2025, [Transmission Critical: The future of Public Service Media](#). p.57.

¹⁸³ Ofcom, 2025, [Transmission Critical: The future of Public Service Media](#). p.62

operas.¹⁸⁴ We said given its remit to support learning for people of all ages the BBC also has a particular responsibility. We suggested that there may be opportunities for PSBs to collaborate more closely to scale up delivery and impact in relation to media literacy.¹⁸⁵

Therefore, **we recommend broadcasting and streaming services create and/or promote programming or educational content that helps people to understand, interpret and assess the credibility of information** on online platforms and digital environments. These would in turn support parents and caregivers in making informed decisions about their child's online experience.

Summary of Responses

- 3.99 Good Things Foundation, Centre for Protecting Women Online, Parent Zone, S4C, the BBC, Channel 4 and the Welsh government agreed with our proposal that public service broadcasters (PSBs) can play a significant role in supporting and promoting media literacy.¹⁸⁶
- 3.100 Internet Matters referenced their research, which showed news outlets and broadcasters continue to play a pivotal role for young people in verifying information, and, accordingly, said that it was positive that Ofcom's statement was targeted towards a wide range of organisations, including established news and broadcast services.¹⁸⁷
- 3.101 Parent Zone said that, alongside broadcasting services, streaming services could play a significant role.¹⁸⁸ Parent Zone said that the TV show *Adolescence*, which premiered on Netflix in March 2025 and dealt with themes relating to young people's use of social media, was an example of the impact that streaming services can have on UK audiences. However, Parent Zone also said that this example also demonstrated that there might be risks associated with content that raises audiences' concerns and awareness of issues without accompanying educational materials that could help to provide solutions.
- 3.102 Internet Matters and Mencap said that social media is the primary source of news for many young people, and that excluding online services such as social media from Recommendation 7 risks leaving a significant gap in the media literacy ecosystem.¹⁸⁹ The British Film Institute (BFI) also said that a wider set of services should be included in Recommendation 7 because many other online services now act as primary sources of educational content, including video games, video sharing platforms (VSPs), and video archives like Pathe, BBC archives and BFI national archive.¹⁹⁰ Dr Craig Haslop, University of Liverpool, said that services should be responsible for educating young people on gendered algorithmic cultures and how content creation and influencers work.¹⁹¹
- 3.103 Some respondents asked for prominence on online services. Channel 4 and the BBC, as Public Service Broadcasters (PSBs), said that they should have increased prominence to deliver high-quality, trusted content.¹⁹² Channel 4 called for further prominence on VSPs, and the BBC called for

¹⁸⁴ Ofcom, 2025, [Transmission Critical: The future of Public Service Media](#), pp.60-61

¹⁸⁵ Ofcom, 2025, [Transmission Critical: The future of Public Service Media](#), p.61.

¹⁸⁶ [Good things foundation](#), response, pp.7-8; [Centre for protecting Women Online](#), pp.5-6; [Parent Zone](#), response, pp.11-12; [S4C](#), response, pp.3-4; [BBC](#), response, p.9; [Channel 4](#), response, pp.1-2; The Welsh Government response

¹⁸⁷ [Internet matter](#), response, p.2

¹⁸⁸ [Parent Zone](#), response, pp.11-12

¹⁸⁹ [Internet matter](#), response, pp.10-11; [Mencap](#), response, p.3

¹⁹⁰ [BFI](#), response, p.10

¹⁹¹ [Dr Craig Haslop, University of Liverpool](#), response, 2025, p.1

¹⁹² [BBC](#), response, pp.8-9; [Channel 4](#), pp.1-2

greater prominence on IP-first platforms. Molly Rose Foundation also said that high-quality content from PSBs, alongside national health services, should be promoted on online services.¹⁹³ Dr Elinor Carmi said that trusted sources and organisations should be given prioritisation on social media services' feeds.¹⁹⁴

- 3.104 Information Integrity Research Network and Parent zone agree that PSBs can play an important role in creating and promoting programming that helps people understand, interpret and assess the credibility of information.¹⁹⁵ However, it said that while trust in PBS is currently high, opinions on PSBs are becoming increasingly polarised and “media-literacy programming must be insulated from being framed as partisan.”¹⁹⁶
- 3.105 S4C said that Welsh language programming is important alongside educational content that helps people to understand, interpret and assess the credibility of information.¹⁹⁷

Our response

- 3.106 We agree with stakeholders that PSBs and other trusted providers of high-quality information continue to play a central role in supporting users' ability to assess content. Recommendation 7 encourages PSBs and other broadcasters and streamers to create and/or promote programming and educational content that helps people understand, interpret and assess the credibility of information in digital environments.
- 3.107 We agree that streaming services can have a significant impact through high-profile content, and that impact is strongest when paired with accessible supporting materials that help audiences act on what they have seen. Recommendation 7 is intended to encourage services to complement awareness-raising programming with clear signposting, guidance or educational resources. It is important that audiences are supported where possible rather than left with no route to further information or opportunities to learn new skills.
- 3.108 We also agree that many young people use social media as their primary form of news and that many different services now act as people's primary way of consuming educational content. We have broadened Recommendation 7 to include online and other content-related services.
- 3.109 Regarding stakeholders who said that greater prominence should be given to PSB content on video-sharing and IP-first services, Recommendation 7 is a media literacy recommendation rather than a prominence framework. However, it aligns with Ofcom's wider work on public service media and the importance of ensuring audiences can readily find high-quality, trusted content in digital environments. In 2025, Ofcom published *Transmission Critical: The future of Public Service Media*, where we set out that PSBs, other broadcast services, SVoD services and VSPs that audiences increasingly turn to should work together to make Public Service Media content easy to find.¹⁹⁸
- 3.110 Regarding stakeholder suggestions that trusted sources and organisations should be prioritised on service feeds, Recommendation 7 supports the underlying objective, helping people to assess credibility by encouraging the creation and promotion of relevant programming and educational content, including content from trusted providers. However, approaches to ranking and

¹⁹³ [The Molly Rose Foundation](#), response, p.8

¹⁹⁴ [Dr Elinor Carmi](#), response, p.3

¹⁹⁵ [Information Integrity Research Network](#), response, p.5; [Parent Zone](#), response, p.12

¹⁹⁶ [Information Integrity Research Network](#), response, p.5

¹⁹⁷ [S4C](#), response, pp.3-4

¹⁹⁸ Ofcom, 2025, [Transmission Critical: The future of Public Service Media](#), pp.45-55

prioritisation will vary by service and must be considered proportionately, in ways that support user understanding and avoid unintended consequences.

- 3.111 We note stakeholder recognition of the high-trust relationships that PSB’s hold with their audiences. It is important that PSBs build and maintain audience trust. However, it is right that editorial decisions remain the responsibility of PSBs. We know that some PSBs already provide some informational programming and educational content supporting audiences’ media literacy of a high standard.
- 3.112 We agree that Welsh-language programming is important. Relevant services should, where appropriate, provide access to a wide range of programming and develop effective and culturally appropriate approaches to promote media literacy.

Our final decision

- 3.113 Having considered responses from stakeholders, our final updated recommendation text is in the box below.

Final Recommendation: 7: Help people understand, interpret, and assess the credibility of information by creating and/or promoting relevant programming or educational content

Service providers can reach large audiences through a range of interventions, including educational initiatives, online resources, and programming that supports critical engagement with content. With their wide reach, they are well-placed to support parents, caregivers, and third-party organisations to promote media literacy.

In 2025 Ofcom published [Transmission Critical: The future of Public Service Media](#). In it, we said that PSBs need to invest in media literacy in the UK and called on them to build on existing work.¹⁹⁹ We said that PSBs’ distinctive and trusted relationship with audiences is a key asset in helping people build confidence in navigating digital environments. In [Transmission Critical](#), we also said that PSBs and large commercial broadcasters could have a role to play in supporting users to understand how to use tools to curate their content feeds, and we included examples of media literacy activity from PSBs and Sky.²⁰⁰ These examples included educational initiatives such as workshops for young people, online resources such as quizzes and interactive content and the integration of topical themes into a wide range of programming, from magazine shows to dramas and soap operas.²⁰¹ We said that there may be opportunities for PSBs to collaborate more closely to scale up delivery and impact in relation to media literacy.²⁰² Given its remit to support learning for people of all ages, we said that the BBC has a particular responsibility. In late 2025 the Government published its Green Paper on the BBC Charter which set out potential media literacy duties for the broadcaster.²⁰³ Further, the Government recently

¹⁹⁹ Ofcom, 2025, [Transmission Critical: The future of Public Service Media](#). p.57.

²⁰⁰ Ofcom, 2025, [Transmission Critical: The future of Public Service Media](#). p.62.

²⁰¹ Ofcom, 2025, [Transmission Critical: The future of Public Service Media](#). pp.60-61.

²⁰² Ofcom, 2025, [Transmission Critical: The future of Public Service Media](#). p.61.

²⁰³ [Britain’s Story: The Next Chapter – BBC Royal Charter Review, Green Paper and public consultation](#).

published its *Watch this Space: A new strategic direction for UK media* Green Paper on the future of TV distribution.²⁰⁴

In *Transmission Critical*, we called on PSBs and VSPs to work together to help audiences more easily see and find this content, and we are exploring what steps could support this. Some service providers are already taking steps to surface authoritative content in line with this ask. **We recommend that service providers create and/or promote programming or educational content that helps people to understand, interpret, and assess the credibility of information** through a wide variety of approaches on online services and digital environments in culturally inclusive ways. These would in turn support parents and caregivers in making informed decisions about their child’s online experiences and help prepare children for a digital future.

Recommendation 8

What we proposed

Draft Recommendation 8: Promote media literacy beyond services, investing in campaigns, content, and partnerships that promote media literacy skills

Developing media literacy skills is not innate – it requires time, support and therefore investment. A media literate population is more likely to engage in civic activities,²⁰⁵ and is more likely to have the skills required to contribute to growth in the online economy.

From our own conversations and work that we have commissioned from the Charities Aid Foundation, we know that funding of community-based media literacy skills development programmes is hard to find, short-term and often led by brand desires rather than meeting community needs.

By supporting media literacy programmes, online platforms can engage with communities through those who have trusted relationships, often where change can most effectively be achieved. Whilst this is not without its difficulties, it represents a meaningful change towards proactive responsibility. We encourage online platforms to build strategic partnerships with charities, educators,²⁰⁶ and other bodies to help share the responsibilities and amplify the impact of online platforms and others’ effort.

The House of Lords Media Literacy Inquiry highlighted the role of technology companies in advancing media literacy across the UK, recommending that they invest in the development

of people’s media literacy skills.²⁰⁷ This aligns with one of the goals of our three-year strategy to encourage online services to actively promote, support, and fund media literacy initiatives. We expect this recommendation to be adopted in a proportionate way

²⁰⁴ DCMS, 2026, [Watch this Space: A new strategic direction for UK media](#)

²⁰⁵ Park, 2023, [Exploring the relationship between media literacy, online interaction, and civic engagement.](#)

²⁰⁶ Ofcom, 2025, [A teachable moment: opportunities, gaps and next steps from our review of Media literacy training for teachers.](#)

²⁰⁷ House of Lords Communications and Digital Committee, 2025, [3rd Report of Session 2024-25, Media Literacy.](#) p.37, paragraph 113.

to the scale and reach of each service provider. To that end, **we recommend that service providers actively support media literacy skills development by committing to long term funding of skills-building programmes.** A lot of our learning about ‘what works’ in media literacy skills development suggests this is best delivered by organisations with trusted relationships with their communities. This work is most often local, specific, targeted and impactful.²⁰⁸

Summary of responses

- 3.114 Most stakeholders agreed with the draft Recommendation 8. Good Things Foundation, Workers' Educational Association (WEA), Pinterest, Parent Zone and the BBC said that there was value in partnerships across services, civil society, educators, community organisations and academics for delivering media literacy.²⁰⁹ Impress said that partnerships are vital to supporting people in communities.²¹⁰ Parent Zone said that it is important that online partnerships pursue media literacy partnerships that encompass a wide range of organisations.²¹¹ Dr Craig Haslop, University of Liverpool, said that services should engage with boys and men directly and include youth voice in algorithmic change.²¹²
- 3.115 Parent Zone and PSHE Association said that Ofcom should do more in the partnership ecosystem to help overcome any ‘power imbalances’ that media literacy organisations face when they work with large online services.²¹³ Parent Zone said that the current lack of statutory funding and short-term grant programmes risks creating an unbalanced ecosystem.²¹⁴ The PSHE Association said technology platforms could be part of the funding ecosystem for media literacy programmes – but only with appropriate guardrails and recognition of the power imbalance between funder and fundees.²¹⁵ Dr Elinor Carmi and Shout Out UK also said that online services could be taxed to fund media literacy research and organisations.²¹⁶
- 3.116 PSHE Association said that the interests of media literacy organisations could be promoted through appropriate guardrails such as clearer governance arrangements, greater transparency, and roles for third parties in oversight, auditing, or evaluation of media literacy.²¹⁷
- 3.117 Internet Matters said that Ofcom should do more to promote the benefit of partnerships between services and expert third parties for evaluating media literacy interventions because external evaluation increases credibility.²¹⁸

²⁰⁸ Ofcom, 2024, [What works in delivering media literacy activities](#)

²⁰⁹ [Good things foundation](#), response, pp.7-8; [Workers' Educational Association \(WEA\)](#), response, p.2; [Pinterest](#), response, pp.6-7; [Parent Zone](#), response, pp.12-13; [BBC](#), response, p.9

²¹⁰ [Impress](#), response, p.2

²¹¹ [Parent Zone](#), response, pp.12-13

²¹² [Dr Craig Haslop, University of Liverpool](#), response, pp.3-4

²¹³ [Parent Zone](#), response, p.13; [PSHE](#), response, p.2

²¹⁴ [Parent Zone](#), response, p.13

²¹⁵ [PSHE](#), response, p.2

²¹⁶ [Dr Elinor Carmi](#), response, pp.3-4; [Shout Out UK](#), response, p.3

²¹⁷ [PSHE](#), response, pp.1-2

²¹⁸ [Internet matter](#), response, pp.13-14

- 3.118 S4C raise the importance of having media literacy initiatives and partnerships that reflect the needs of Welsh speakers. ²¹⁹
- 3.119 Google and Pinterest urged caution against a prescriptive approach to partnerships that would require services to partner with specific organisations. ²²⁰
- 3.120 Good Things Foundation, Shoutout UK, Parent Zone, OSAN, the Centre for Protecting Women Online, Impress and the Molly Rose Foundation said that there is a lack of long-term investment and sustainable funding is needed for delivering good media literacy programmes. ²²¹
- 3.121 Good Things Foundations said that it was important that media literacy success stories are shared so that other organisations know what good looks like and that these partnerships are learned from. ²²²
- 3.122 Internet Matters said Ofcom should more clearly acknowledge that online communities, campaigns and partnerships can be as effective as offline ones in delivering media literacy skills. ²²³
- 3.123 Workers' Educational Association (WEA) said Ofcom should recommend that online services engage with Strategic Combined (Mayoral) Authorities as they develop skills strategies (using the devolved Adult Skills Fund) to incorporate media literacy approaches. ²²⁴

Secondary event feedback

Discussion of the recommendations with our Media Literacy advisory panel echoed wider stakeholder views on the challenges associated with asking services to promote media literacy beyond their own services, particularly where this raises questions of independence, trust and conflicts of interest.

Participants at our conference workshops also emphasised the importance of services partnering with educators, local authorities and civil society organisations, noting that sustained investment in partnerships is needed to reach different communities effectively.

Our response

- 3.124 We agree that targeted interventions and specific types of partnerships can help build trust in society beyond individual services. Recommendation 8 encourages services to invest in campaigns, content and partnerships that are tailored to the needs of specific groups, supporting both broad and targeted approaches to media literacy. However, we do not prescribe any individual types of partnerships or interventions.
- 3.125 We believe that a prescriptive approach that would require services to partner with specific organisations is unfeasible, as the recommendations are voluntary. Recommendation 8 is purposefully flexible and outcomes-focused to allow services to identify the most relevant partners for their users and risk context, rather than mandating specific collaborations.

²¹⁹ [S4C](#), response, p.4

²²⁰ [Google](#), response, p.7; [Pinterest](#), response, p.7

²²¹ [Good things foundation](#), response, p.11; [Shout Out UK](#), response, pp.2-3; [Parent Zone](#), response, p.13; [OSAN](#), response, p.4; [Centre for protecting Women Online](#), response, p5; [Impress](#), response, p.2; [Molly Rose Foundation](#), response, p.10

²²² [Good things foundation](#), response, p.9

²²³ [Internet matter](#), response, p.11

²²⁴ [WEA](#), response, p.3

- 3.126 Regarding some stakeholder feedback that there can be a risk of power imbalances in partnerships between smaller service providers and much larger ones, we support efforts to improve transparency, oversight and evaluation in partnership working. Through our Best Practice Principles work, we aim to share guidance and convene workshops to help organisations understand what effective, impactful partnerships look like.
- 3.127 We agree that long-term investment and sustainable funding are important for delivering good media literacy programmes. Recommendation 8 encourages services to commit to long-term funding of skills-building programmes, recognising that sustained support is key to delivering impactful media literacy initiatives.
- 3.128 We agree that sharing media literacy success stories and collaborating with external evaluators can help to build credibility and promote good practice. We have considered this further in Recommendation 10, where we encourage services to share evidence of “what works”, and it is then left to the discretion of services whether they conduct this evaluation themselves or work with expert third parties for evaluation as part of applying these recommendations proportionately.
- 3.129 We recognise that both online and offline communities can play valuable roles in developing media literacy skills and encourage partnerships that leverage these diverse approaches.
- 3.130 We note the suggestion that online services should engage with Strategic Combined (Mayoral) Authorities; however, given that services operate across multiple jurisdictions, we do not consider it feasible to recommend this.

Our final decision

- 3.131 Having considered responses from stakeholders, our final updated recommendation text is in the box below.

Final Recommendation 8: Promote media literacy beyond services, investing in campaigns, content, and partnerships that promote media literacy skills

Developing media literacy skills is not innate – it requires time, support, and investment. A media literate population is more likely to engage in civic activities and is more likely to have the skills required to contribute to economic growth.²²⁵ However, funding for community-based media literacy skills development programmes is often hard to find, short-term, and can be led by brand requirements rather than community needs.

By supporting media literacy programmes, service providers can engage with communities through those who have trusted relationships, often where change can most effectively be achieved. We encourage all services to build strategic, scalable partnerships with charities, educators, and other bodies to help share the responsibilities and amplify the impact of online services and others’ effort.

We will explore developing a set of Best Practice Principles for services that support organisations delivering media literacy activities in the community. These will be co-produced with community organisations and may cover areas such as outcomes, funding models, and programme design.

²²⁵ Park, 2023, [Exploring the relationship between media literacy, online interaction, and civic engagement](#).

The House of Lords Media Literacy Inquiry highlighted the role of technology companies in advancing media literacy across the UK, recommending that they invest in the development of people’s media literacy skills.²²⁶ This aligns with one of the goals of our three-year strategy to encourage online services to actively promote, support, and fund media literacy initiatives. **We recommend that service providers actively support media literacy skills development by committing to long term sustainable funding of skills-building programmes.**

Our learning about ‘what works’ in media literacy skills development suggests that this is best delivered by organisations with trusted relationships with their communities. By ‘trusted partnerships,’ we mean work that is most often local, specific, targeted and impactful.²²⁷ We also recognise that both online and offline communities can play valuable roles in developing media literacy skills. We expect this recommendation to be adopted in a proportionate way to the scale and reach of each service provider.

Recommendation 9

What we proposed

Draft Recommendation 9: Support the media literacy of underserved and diverse audiences

Media literacy must be inclusive. It should not only focus on those who are already able to engage with service providers, but also seek to reach those who, for various reasons, are currently unable to participate in media literacy initiatives. This inclusivity should be embedded from the design stage, through user engagement, and into broader societal outreach.

At the design stage, supporting the media literacy of under-served and diverse audiences means recognising that every design decision can affect users differently. Online platforms, broadcasting and streaming services should therefore aim to meet a wide range of needs by involving diverse users in the research and development process, ensuring that services are both accessible and relevant. Ensuring accessibility for users with disabilities, including those who rely on screen-reading technology, should be a key consideration.²²⁸

Service providers should also consider how to support the media literacy of diverse audiences when they are using their services. This means recognising that factors such as age, online skills, confidence, and accessibility needs all influence how information is

²²⁶ House of Lords Communications and Digital Committee, 2025, . p.37, paragraph 113.

²²⁷ Ofcom, 2024, [What works in delivering media literacy activities](#)

²²⁸ Ofcom research found that 18% of internet users aged 16-24 reported having had difficulty reading information online because the content was difficult to navigate using a keyboard. The same proportion reported the same difficulty because the content was not compatible, or was difficult to use, with a screen reader or screen-reading technology. Source: Ofcom, 2023, Platform Terms and Accessibility (Q6)

received and understood, and that different user groups may be affected differently by certain types of content.²²⁹

We therefore recommend that service providers adopt inclusive design practices that address a broad spectrum of media literacy needs, especially for those most at risk. This includes using plain language, visual cues, and conducting user testing with underrepresented groups to ensure that information is clear, accessible, and meaningful.

Beyond the core offering, service providers must consider how underserved or marginalised communities might need support to access and engage meaningfully. Barriers to access can arise from factors such as socioeconomic status, age,²³⁰ sex, disability, and other intersecting characteristics.⁵¹ Our experience is that media literacy initiatives that are informed by people’s lived experiences, cultures, and contexts are more likely to be effective and inclusive. We recognise that this work can be complex and resource-intensive and that some traditional broadcasters and community radio services already carry out work to reach underserved and marginalised communities. We encourage them to continue with these initiatives and report on them.

We also recommend that online platforms form partnerships with third sector organisations, government bodies, Ofcom, and grassroots community groups, particularly those with strong connections to underserved communities, to co-design and deliver impactful media literacy interventions.

Summary of responses

- 3.132 Stakeholders were broadly supportive of Recommendation 9. Good Things Foundation, Internet Matters, Welsh Government, Parent Zone, Information Integrity Research Network, and S4C all agreed that supporting underserved and diverse audiences was an important issue and expressed broad support for the aims of this recommendation.²³¹
- 3.133 Many stakeholders agreed with the importance of forming partnerships with third sector organisations to support underserved and diverse audiences. Good Things Foundation, Wikimedia UK, and Parent Zone said that services should form partnerships with third sector organisations to co-design and deliver media literacy interventions.²³² Good Things Foundation stressed that many of the third sector organisations placed to deliver these services are currently facing funding challenges, whilst Parent Zone highlighted that these partnerships should be sustained and meaningful.²³³
- 3.134 Some referenced support for vulnerable and under-served groups, including Centre for Protecting Women Online (CPWO) who provided evidence that women and girls are disproportionately

²²⁹ Evidence suggests that neurodiverse children may be more likely to be adversely affected by content depicting violence. Ofcom, 2024, [Understanding pathways to online violent content among children](#).

²³⁰ Ofcom, 2024, [Exploring high media literacy among children aged 8-12](#) and [Exploring high media literacy among adults and children](#).

²³¹ [Good Things Foundation](#), response, pp.9-10; [Internet Matters](#), response, pp.12-13; The Welsh Government response; [Parent Zone](#), response, pp.14-15; [Information Integrity Research Network](#), response, pp.5-6; [S4C](#), response, p.4

²³² [Good Things Foundation](#), response, pp.9-10; [Wikimedia UK](#), response, p.3; [Parent Zone](#), response, pp.14-15

²³³ [Good Things Foundation](#), response, pp.9-10; [Parent Zone](#), response, pp.14-15

targeted by online harassment, sexual exploitation, and image-based abuse, recommending partnerships with specialist organisations as one way to combat this.²³⁴ Mencap also noted that tools designed for children could be designed to work for adults with a learning disability, elderly or people with dementia, re-emphasising the need for co-design.²³⁵ Professor Lee Edwards and Emma Goodman (London School of Economics and Political Science) also noted that Ofcom should encourage engaging with groups with additional needs.²³⁶

- 3.135 REPHRAIN and the British Film Institute (BFI) both said that media literacy initiatives to support underserved and diverse audiences should be activated nationally and reflect the diverse breadth of the UK.²³⁷ REPHRAIN also highlighted the importance of delivering these initiatives both online and offline.²³⁸ The Welsh Government similarly flagged that many diverse groups avoid using online services to avoid hate speech, and so will miss these media literacy initiatives where they are only provided in an online setting.²³⁹
- 3.136 Centre for Protecting Women Online said that there should be explicit recognition that women and girls, particularly those facing intersectional discrimination, are disproportionately targets of online abuse.²⁴⁰
- 3.137 Mencap said that labelling the initiatives as potentially ‘complex and resource-intensive’ could be counter-productive, and that instead the recommendation should focus on the benefits of co-production and design.²⁴¹ REPHRAIN said that migrant parents need culturally sensitive support to navigate consent, data ownership, and child safety issues and suggested that Ofcom co-design educational resources with underrepresented communities.²⁴²
- 3.138 Molly Rose Foundation said that there is a lack of specificity on what good practice would look like for children with different capacities and vulnerabilities beyond just high-level principles.²⁴³
- 3.139 Some stakeholders said that language plays a critical role in supporting inclusivity and accessibility. REPHRAIN said that linguistically and culturally inclusive media literacy and support was needed, particularly for migrant parents.²⁴⁴ Similarly, the Welsh Government said that information should be available in the Welsh language to ensure equitable support, and S4C also said that ensuring media literacy initiatives reflect the needs of Welsh speaking audiences was important.²⁴⁵

Our response

- 3.140 We welcome stakeholder broad support for this recommendation. We agree with stakeholders that long-term funding and partnerships are important, and this is included in Recommendation 8, which encourages service providers to commit to long-term funding of skills-building programmes with third parties.

²³⁴ [Centre for Protecting Women Online](#), response, p.6

²³⁵ [Mencap](#), response, pp.3-4

²³⁶ [Professor Lee Edwards and Emma Goodman \(London School of Economics and Political Science\)](#), response, p.4

²³⁷ [REPHRAIN](#), response, pp.7-8; [British Film Institute \(BFI\)](#), response, p.6

²³⁸ [REPHRAIN](#), response, pp.7-8

²³⁹ The Welsh Government response

²⁴⁰ [Centre for Protecting Women Online](#), response, p.6

²⁴¹ [Mencap](#), response, pp.3-4

²⁴² [REPHRAIN](#), response, pp.7-8

²⁴³ [Molly Rose Foundation](#), response, pp.10-11

²⁴⁴ [REPHRAIN](#), response, pp.7-8

²⁴⁵ The Welsh Government response; [S4C](#), response, p.4

- 3.141 We acknowledge stakeholder requests for initiatives to be activated nationally. It's clear that large-scale programmes have the best potential for reach, but also that programme effectiveness often relies on delivery by trusted community organisations. This creates a potential tension between reach and impact, which services may be well placed to address through sustainable partnerships with organisations that can deliver media literacy training within communities at scale.
- 3.142 Regarding stakeholder concerns that media literacy initiatives are framed as 'complex and resource intensive', the objective of this framing is to recognise the invaluable work that third sector organisations carry out on a day-to-day basis across the UK. The benefits of co-production and design are referred to throughout the recommendation, and third sector organisations are well placed to deliver these benefits through their ongoing work.
- 3.143 Regarding some stakeholder concerns that this recommendation is not specific enough and requests that Ofcom adopt a more prescriptive approach, we do not agree that it is appropriate for Ofcom to recommend standardised approaches across services in scope. As we have explained in the 'Our response' section of Recommendation 5, the variety of services means that standardisation may not be effective. This is consistent with the position we have taken in our *Statement on Protecting Children from Harms Online*.²⁴⁶ We encourage services to reduce friction and complexity wherever possible through clearer language, more consistent labelling, and more intuitive user journeys. We also support cross-sector collaboration, through research and our commissioned works, that helps improve usability and shared understanding for parents and caregivers.
- 3.144 We agree that language is an important component of inclusive online experiences. In the Welsh Language Impact Assessment of this Statement, we highlight the importance of considering language needs to ensure initiatives appropriately support vulnerable groups.

Our final decision

- 3.145 Having considered the responses from stakeholders, our final updated recommendation text is in the box below.

Final Recommendation 9: Support the media literacy of underserved and diverse audiences

Media literacy must be inclusive. It should not only focus on those who are already able to engage with services, but also seek to reach those who, for various reasons, are currently unable to participate in media literacy initiatives. This inclusivity should be embedded from the design stage, through user engagement, and into broader societal outreach.

At the design stage, supporting the media literacy of underserved and diverse audiences means recognising that every design decision can affect users differently. Online, broadcast, and streaming services should therefore aim to meet a wide range of needs by involving diverse users in the research and development process, ensuring that services are both accessible and relevant. Ensuring accessibility for users with disabilities should be a key consideration.

Service providers should also consider how to support the media literacy of diverse audiences when they are using their services. This means recognising that factors such as

²⁴⁶ [Volume 4 What should services do to mitigate the risks of online harms to children](#), Ofcom

age, online skills, confidence, socio-economic status, and accessibility needs, all influence how information is received and understood, and that different user groups may be affected differently by certain types of content.

We recommend that service providers adopt inclusive design practices that address a broad spectrum of media literacy needs, especially for those most at risk. This includes using plain language, visual cues, and conducting user testing with under-represented groups to ensure that information is clear, accessible, and meaningful.²⁴⁷²⁴⁸

Beyond the core offering, service providers must consider how underserved or marginalised communities might need support to access and engage meaningfully. Barriers to access can arise from factors such as socioeconomic status, age, sex, disability, and other intersecting characteristics.²⁴⁹²⁵⁰ Our experience is that media literacy initiatives that are informed by peoples lived experiences, cultures, and contexts are more likely to be effective and inclusive. We recognise that this work can be complex and resource-intensive and that some traditional broadcasters and community radio services already work to reach underserved and marginalised communities. We encourage them to continue with these initiatives and report on them.

Given those complexities, we also recommend that service providers who don't have local community knowledge form partnerships with third sector organisations and grassroots community groups, and particularly third sector organisations that have strong connections to underserved communities, to co-design and deliver impactful, scaled media literacy interventions.

On Evaluating What Works

3.146 Recommendation 10 in this section is focused on promoting the assessment of media literacy initiatives and the continuous improvement of people's experiences through each of the three other steps (i.e. via design, during use and beyond the service).

²⁴⁷ This aligns with the position of the ICO and CMA in their joint DRCF paper on "Harmful Design in Digital Markets", [harmful-design-in-digital-markets-ico-cma-joint-position-paper.pdf](#)., where they promote fair, transparent, and user-centric digital environments.

²⁴⁸ Transparency is a core principle of the UK GDPR, and further guidance on how to ensure users understand how their personal data is collected, used, stored and shared, is available on the ICO website, [Transparency | ICO](#)

^[1] Ofcom, 2024, [Exploring high media literacy among children aged 8-12](#) and [Exploring high media literacy among adults and children](#).

²⁴⁹ Ofcom, 2024, [Exploring high media literacy among children aged 8-12](#) and [Exploring high media literacy among adults and children](#).

²⁵⁰ Ofcom, 2024, [Boosting skills among children, older adults and Disabled people: Evaluating what works for media literacy](#).

Recommendation 10

What we proposed

Draft Recommendation 10: Conduct and publish evaluations of the impacts of their choices and activities

Evaluation plays an important role in understanding the impact that design choices and interventions have on people’s knowledge, skills, and behaviours. To support organisations in conducting robust assessments, we have published an [Outcomes Bank](#) and an [Evaluation Toolkit](#). These resources are designed to help organisations measure the effectiveness of their media literacy efforts and understand how they are contributing to improving media literacy.

It is vital that service providers evaluate the impact of their media literacy activities. Evaluating design choices enables them to understand what works, what does not, and where improvements are needed.

Evaluation approaches should be relevant and proportionate. For example, while larger online platforms may be able to use advanced methods such as A/B testing or randomised control trials (RCTs), smaller service providers can focus on simpler methods to assess the benefits of interventions for their target audiences.

Reporting and sharing findings help build a clearer picture of the scale and nature of media literacy activity across the UK. We recognise that some service providers embed media literacy by design or deliver targeted interventions. However, these efforts are often part of broader initiatives and may not be reported as media literacy work. Capturing and reporting on these activities reduces duplication, sets benchmarks for others, and highlights existing commitments in terms of measures and resourcing. This, in turn, helps identify where further action is needed. If findings are published, they can also contribute to a wider body of knowledge on the impact of media literacy.

We therefore recommend that service providers regularly assess the impact of their design choices and media literacy activities and publish their findings.

We also recommend that service providers publish an annual statement on their media literacy activities, including:

- Media literacy by design choices that offer people meaningful choice and control from the outset.
- Any programmatic content which supports the promotion of media literacy outcomes, as defined by Ofcom’s media literacy outcomes bank.
- Delivery of scaled media literacy interventions to their target audiences, including details of the number of people reached and where they were delivered.
- Collaboration and support for organisations who are trusted by underserved audiences.

By embracing the challenge of reporting on media literacy activities, the largest service providers can lead by example in this area, demonstrating these recommendations in use

and helping to build a stronger evidence base for what works. As with all evaluation, approaches should be relevant and proportionate.

Summary of responses

- 3.147 There was strong support for evaluating media literacy activity and design choices. Across the written responses, stakeholders were broadly supportive of the value of evaluation and agreed it should be included in the recommendations. This included support from organisations such as Internet Matters, Mencap, and Pinterest.²⁵¹
- 3.148 Some online services and trade bodies said that Ofcom should not adopt a prescriptive or mandatory approach to evaluation and reporting requirements. Some respondents said that it was important that evaluation and reporting recommendations were not overly prescriptive or mandatory, cautioning against a one-size-fits-all approach. Pinterest said that service-specific, proportionate approaches are more likely to produce meaningful insights.²⁵² Google said that consistent cross-service measurement is challenging and that a single metric could be impractical or burdensome.²⁵³ Trade bodies, including COBA, said that Ofcom should consider the costs, commercial sensitivities and regulatory burden associated with evaluation and reporting, while COBA said that Ofcom should reconsider its proposal that service providers publish an annual statement on their media literacy activities.²⁵⁴
- 3.149 Several stakeholders said that independent evaluation was important to improve credibility and reduce conflicts of interest. Civil society organisations, including Parent Zone and Internet Matters, supported independent or third-party evaluation, and Media and Information Literacy Alliance (MILA) said that evaluation methods should be grounded in a clear theory of change and delivered by neutral third parties.²⁵⁵ Middle Tech Coalition (MTC) said that evaluation could be intensive for smaller businesses, potentially requiring upskilling or external commissioning.²⁵⁶
- 3.150 Several respondents said that Ofcom should provide more support and coordination. Google said that Ofcom could facilitate a shared research agenda (including robust methods such as trials and longitudinal research), and the BBC said Ofcom should consider mechanisms that encourage joint initiatives and shared frameworks.²⁵⁷ Internet Matters also said that Ofcom should clarify how it intends to measure overall uptake and the sector-wide impact of the 10 recommendations.²⁵⁸
- 3.151 Some stakeholders asked questions about how the recommendations regarding evaluation and reporting might relate to other regulatory and reporting requirements and said that duplication should be avoided. The Middle Tech Coalition (MTC) and Pinterest said that the recommendations regarding evaluation and publication requirements might require reporting on elements that may be required by Ofcom under wider Online Safety requirements.²⁵⁹ PayPal said that proportionality was important, particularly for firms already authorised and regulated by the FCA.²⁶⁰ S4C said that it

²⁵¹ [Internet Matters](#) response, p. 13; [Mencap](#) response, P. 4; [Pinterest](#) response, p. 7

²⁵² [Pinterest](#) response, p. 7

²⁵³ [Google](#) response, p. 8

²⁵⁴ [COBA](#) response, p. 2

²⁵⁵ [Parent Zone](#) response, p. 15; [Internet Matters](#) response, p. 13; [Media and Information Alliance](#) response, p5.

²⁵⁶ Middle Tech Coalition (MTC) response

²⁵⁷ [Google](#) response, p. 8; [BBC](#) response, p. 9

²⁵⁸ [Internet Matters](#) response, pp. 13 – 14

²⁵⁹ [Pinterest](#), p. 7; Middle Tech Coalition (MTC) response

²⁶⁰ PayPal response

could use its Statement of Programme Policy reports as a mechanism for publishing an annual statement to avoid unnecessary duplication and ensure reporting is aligned and accessible.²⁶¹²⁶²

- 3.152 Some stakeholders said that there should be stronger expectations on services regarding reporting, accessibility and outcome-focused metrics. Several civil society and academic respondents said that Ofcom should strengthen expectations around publishing evaluation outputs, including ensuring outputs are accessible and sufficiently specific. Good Things Foundation said that consistent monitoring and evaluation were important, including consistent data collection at both intervention and population level (including highlighting gaps in measuring digital exclusion).²⁶³ Additionally, they said that evaluation outputs should be made readily available. The Molly Rose Foundation said that Ofcom’s transparency guidance could help drive compliance by requiring services to provide information on measures to improve users’ media literacy and evaluations of effectiveness.²⁶⁴²⁶⁵ Parent Zone said that evaluations should evidence behaviour change over time, supported by clear baselines, and highlighted the value of independence to reduce the risk of partnerships being performative rather than impactful.²⁶⁶
- 3.153 Some stakeholders said that outcome measures should consider those more vulnerable to online harms. Antisemitism Policy Trust said that evaluation should include outcome-based measures tied to real-world harms for protected groups, and should include metrics on the reliability of sources surfaced by AI/search (e.g., reach of credible information among vulnerable groups; frequency of antisemitic or conspiratorial misinformation in AI/search results; user-reported experiences of hate or bias; and ratios of credible versus manipulated sources surfaced).²⁶⁷ Centre for Protecting Women Online said that evaluation should measure outcomes relevant to preventing technology-facilitated violence against women and girls (TFVAWG), not only generic media literacy metrics.²⁶⁸
- 3.154 Professor Lee Edwards and Emma Goodman (London School of Economics and Political Science) said that if evaluations are published, they should be accessible to users; otherwise, publication risks undermining user accountability.²⁶⁹

Secondary event feedback

In line with the above feedback, amongst the Media Literacy advisory panel, there was strong support for outcome-based approaches to media literacy work, with calls for clearer benchmarks and for approaches that encourage organisations to share learning rather than treat evaluation as a compliance exercise.

²⁶¹ Ofcom’s [Statement of Programmes Policy](#) requires all licenced PSBs to publish their own annual statement of programme policy which includes setting out how they will fulfil their remit and regulatory obligations.

²⁶² [S4C](#) response, p. 4

²⁶³ [Good Things Foundation](#) response, p. 10

²⁶⁴ [Statement: Transparency Reporting](#), Ofcom, 2025. This provides detail on how Ofcom decides what information categorised services must include in their transparency report and details on how to ensure compliance.

²⁶⁵ [Molly Rose Foundation](#) response, pp. 3-4

²⁶⁶ [Parent Zone](#) response, p. 15

²⁶⁷ [Antisemitism Policy Trust](#) response, p. 4

²⁶⁸ [Centre for Protecting Women Online](#) response, p. 6

²⁶⁹ [Professor Lee Edwards and Emma Goodman, London School of Economics and Political Science](#) response, p. 6

Those who attended our workshops at our conference highlighted the importance of transparent, outcomes-focused evaluation and reporting, and supported Recommendation 10 as a result.

Our response

- 3.155 We agree with stakeholders that said our recommendations should not be prescriptive or include mandatory evaluation and reporting requirements. It is outside the scope of the Act for these recommendations to impose mandatory reporting requirements. As we work with services that implement this recommendation, we will be clear that evaluation approaches should be proportionate and fit for purpose, recognising differences in service size, operating model, and risk profile, and that there are multiple credible methods of evaluation (from lighter-touch approaches through to more advanced methods).
- 3.156 We agree with stakeholders that Ofcom can play a role in providing continued support and coordination, and in promoting independent evaluation where it adds value. As we work with service providers to implement these recommendations and develop any further supporting materials, we will consider how best to continue to signpost robust evaluation practice (including where independent or third-party evaluation may add value) and how existing approaches and resources aimed at the delivery sector, such as [Ofcom's Media Literacy Outcomes Bank and Evaluation Toolkit](#), may be adapted to support wider audiences. We will continue to consider additional steps we might take to further support services, such as publishing a media literacy research agenda.
- 3.157 We agree that services may need to take into account any existing regulatory reporting requirements. Because these recommendations are non-binding, services have some flexibility to adapt their approach to best suit the specific needs of their users and provides an opportunity for service providers to work with Ofcom to trial, innovate and iterate. We encourage services to avoid duplication, particularly where they are already meeting requirements under other regimes. These recommendations, explanatory text and suggested reading are not intended to override or displace any regulatory requirements placed on service providers. Service providers that fail to meet their legal obligations may face enforcement action.
- 3.158 Regarding stakeholders' suggestion that services should evaluate the impact of their services on people who are more vulnerable to online harms, these recommendations are aimed at how services promote media literacy rather than how services assess and mitigate the risks of harm on their service. The OSA includes a range of other provisions which aim to promote safer online experiences, for example the risk assessment process requires online services to assess whether there are any specific characteristics or functionalities of the service's design or operation which could increase the risks of harm, including 'Hate' as a harm.²⁷⁰ Ofcom has also issued practical recommendations for tech companies outlined in Ofcom's *A safer life online for women and girls* guidance, as to how service providers' design choices can ensure that users' online safety is a key consideration and mitigate online gender-based harms effectively.²⁷¹
- 3.159 We agree that there would be benefits to stakeholders in ensuring that any evaluation is accessible to its users. Recommendation 1's emphasis on making accessible design choices in policy translates to accessible evaluation, during planning, data collection and publication.

²⁷⁰ [Statement: Protecting people from illegal harms online](#), Ofcom, 2024

²⁷¹ [Statement and Guidance: A safer life online for women and girls](#), Ofcom, 2025

3.160 We don't agree that the recommendations should be strengthened with respect to expectations on publication, accessibility and outcome-focused metrics. These recommendations are non-binding, and we want services to adopt them in proportionate, innovative and effective ways. This means avoiding being too prescriptive and continuing to work with stakeholders on what works, and how they can best evaluate their media literacy initiatives and report on them in ways that meet the needs of wider stakeholders and their users.

Our final decision

3.161 Having considered the responses from stakeholders, our final updated recommendation text is in the box below.

Final Recommendation 10: Conduct and publish evaluations of the impacts of their choices and activities

Evaluation plays an important role in understanding the impact that design choices and interventions have on people's knowledge, skills, and behaviours. It is vital that service providers evaluate the impact of their media literacy activities. Evaluating design choices enables them to understand what works, what does not, and where improvements are needed.

Evaluation approaches should be relevant and proportionate. For example, while larger online services may be able to use advanced methods such as A/B testing or randomised control trials (RCTs), smaller service providers can focus on simpler methods to assess the benefits of interventions for their target audiences.

Reporting and sharing findings helps build a clearer picture of the scale and nature of media literacy activity across the UK. We recognise that some service providers embed media literacy by design or deliver targeted interventions. However, these efforts are often part of broader initiatives and may not be reported as media literacy work. Capturing and reporting on these activities reduces duplication, sets benchmarks for others and highlights existing commitments in terms of measures and resourcing. This, in turn, helps identify where further action is needed. If findings are published, they can also contribute to a wider body of knowledge on the impact of media literacy.

We recommend that service providers regularly assess the impact of their design choices and media literacy activities and publish their findings.

We also recommend that service providers publish an annual statement on their media literacy activities, including:²⁷²

- Media literacy by design choices that offer people meaningful choice and control from the outset;
- Any programmatic content which supports the promotion of media literacy outcomes, as defined by [Ofcom's media literacy outcomes bank](#);

²⁷² For the licensed public service broadcasters – Channel 3 licensees, Channel Four Television Corporation ('C4C') and the Channel 5 – please refer to Ofcom's [Statement of Programme Policy Guidance](#) section 2.57

- Delivery of scaled media literacy interventions to their target audiences, including details of the number of people reached, funding metrics, and where they were delivered; and
- Collaboration and support for organisations that are trusted by underserved audiences, including their funding contributions.

By embracing the challenge of reporting on media literacy activities, the largest service providers can lead by example and build a stronger evidence base for what works. As with all evaluation, approaches should be relevant and proportionate.

We will review and revise the recommendations in 2029. In advance of that, we will report on how online services and broadcasters have adopted the recommendations which may reference the annual statements made by services adopting the recommendations.

Other considerations

- 3.162 Stakeholders raised other considerations through their responses to the consultation, which did not reference any specific recommendation or consultation section. These responses are summarised in this section.

Summary of responses

- 3.163 Professor Lee Edwards and Emma Goodman (London School of Economics and Political Science) and the Economist Educational Foundation suggested adding a specific recommendation that encourages cross-industry collaboration and information sharing to develop shared best practice.²⁷³
- 3.164 Advertising Association and Media Smart asked for recognition of how the commercial and advertising sector is a component of media literacy and specific recommendations for clear labelling and explanation of advertising and sponsored content.²⁷⁴
- 3.165 Parent Zone asked for a recommendation that encourages services to share their product roadmaps to enable third parties to anticipate information needs and prepare for technological changes.²⁷⁵
- 3.166 Council for Countering Online Disinformation (CCOD) said that additional measures under ‘design for better user choice’ would be welcome, such as a tool to filter out content that does not meet international journalistic standards on factual accuracy and suggest news content from different viewpoints to prevent algorithms from rewarding extremist content and one-sided engagement.²⁷⁶

Our response

- 3.167 We agree on the importance of cross-industry collaboration and the sharing of best practice. Due to potential commercial sensitivities, it is not appropriate for us to explicitly recommend information sharing.
- 3.168 We note the suggestion on labelling and advertising on sponsored content. Ofcom plans to consult in 2026 on additional duties which apply to categorised service providers, which cover duties

²⁷³ [Professor Lee Edwards and Emma Goodman \(London School of Economics and Political Science\)](#), response, pp.4-5

²⁷⁴ [Advertising Association and Media Smart](#), response, p.7

²⁷⁵ [Parent Zone](#), response, pp.15-16

²⁷⁶ [Council for Countering Online Disinformation \(CCOD\)](#), response, pp.4-5

relating to fraudulent advertising, terms of service, and user empowerment. This statement is due to be published in 2027.²⁷⁷ When we review and revise these recommendations in the future, we may consider these suggestions again in light of the new duties and any other developments.

- 3.169 Due to potential commercial sensitivities, it is not appropriate for us to recommend that online services share product roadmaps.
- 3.170 We have not added any further recommendations under ‘design for better user choice’, as we consider Recommendations 1 to 2 to sufficiently cover the suggestions.

Our final decision

- 3.171 Having considered the responses provided by stakeholders, we have decided not to add any further recommendations. We will review and revise the recommendations, and we plan to complete this revision in 2029.

²⁷⁷ Ofcom, 2025, [Ofcom's approach to implementing the Online Safety Act](#)

4. Implementation of the recommendations

- 4.1 Stakeholders gave feedback regarding how the recommendations should be implemented by in-scope services, and how adoption of the recommendations should be encouraged, which is summarised in this section.

Summary of responses

- 4.2 Google, Wikimedia UK and The Middle tech coalition (MTC) said that Ofcom should use voluntary methods to drive adoption. Google suggested we should establish baseline expectations for our recommendations and allow for implementational flexibility.²⁷⁸ Wikimedia UK said that they recommend voluntary means of driving adoption that show that providers are meeting a high standard with the help of independent third parties.²⁷⁹ MTC said that in order to avoid diverting resources from vital safety compliance measures, Ofcom should ensure any future reporting scheme is voluntary and collaborative.²⁸⁰
- 4.3 Similarly, the Advertising Association and Media Smart said that Ofcom should leverage trade associations to promote adoption among members and that recommendations should be voluntary, but if there is poor uptake, we should consider making them mandatory.²⁸¹
- 4.4 The Antisemitism Policy trust, The BFI, The Good Things Foundation, Dr Elinor Carmi, The Centre for the Protection of Women Online, National Association of Head Teachers (NAHT) and Parent Zone said that a voluntary approach to driving adoption of the recommendation will not be sufficient.²⁸² Antisemitism Policy Trust said that, as the recommendations are not mandatory, they may be unlikely to be adopted in full by services and requested Ofcom to go further in codifying them.²⁸³ The BFI said they understand the voluntary nature of Ofcom’s recommendations but believe that Ofcom should make sure the recommendations are underpinned with stronger requirements or mandates to ensure their effectiveness.²⁸⁴ Good Things Foundation said that Ofcom has a role in enforcing the recommendations and not just encouraging them.²⁸⁵ They say that Ofcom has a significant role in enforcing ‘a co-designed, standardised design’ that ensures users and audiences can navigate online services. Dr Elinor Carmi said that given online services are profit-driven, expecting them to develop media literacy programs voluntarily will not work and that recommendations must go further than being voluntary.²⁸⁶ The Centre for the Protection of Women Online said that meaningful change can only be made if adoption is encouraged through legislative

²⁷⁸ [Google](#), response, p.7; [Wikimedia UK](#), response, p.6; Middle Tech Coalition (MTC) response

²⁷⁹ [Wikimedia UK](#), response, p.6

²⁸⁰ Middle Tech Coalition (MTC) response

²⁸¹ [Advertising Association and Media Smart](#), response, p.7

²⁸² [Antisemitism Policy Trust](#), response, p.6; [BFI](#), response, pp.9-10; [The Good Things Foundation](#), response, p.11; [Dr. Elinor Carmi](#), response, pp.4-5; [Centre for the Protection of Women Online](#), response, p.7; [National Association of Head Teachers \(NAHT\)](#), response, p.5; [Parent Zone](#), response, pp.16-17

²⁸³ [Antisemitism Policy Trust](#), response, p.6

²⁸⁴ [BFI](#), response, pp.9-10

²⁸⁵ [The Good Things Foundation](#), response, p.11

²⁸⁶ [Dr. Elinor Carmi](#), response, pp.4-5

and regulatory measures that codify obligations.²⁸⁷ The National Association of Head Teachers (NAHT) said they are disappointed that the proposals outlined by Ofcom are recommendations only and would welcome a strengthening of them to become a compulsory code of practice.²⁸⁸ Parent Zone said that Ofcom should move beyond recommendations which support media literacy and instead set these out as mandatory duties.²⁸⁹

- 4.5 Shout Out UK, Antisemitism Policy Trust, and The University of Glasgow said reports are important for driving adoption.²⁹⁰ Shout Out UK said that we should link compliance to financial penalties and that we should require large online services to publish detailed, independently audited reports outlining their annual investment (in time and money) in media literacy initiatives outside of their service.²⁹¹ Antisemitism Policy Trust said that Ofcom could produce reports and guidance to help services with the implementation of the recommendations.²⁹² The University of Glasgow said we should have recognition schemes or public reporting and suggested incentivising active engagement over silence by highlighting proportional responders as good-practice exemplars.²⁹³
- 4.6 Media and Information Literacy Alliance (MILA) and VoiceBox said that Ofcom could use accreditation with benefits to services through showcasing good practice, with awards and commendations.²⁹⁴ Similarly, The Economist Educational Foundation said that there should be certification of those who demonstrate good practice.²⁹⁵ Attendees of our conference workshops supported the development of common standards or accreditation for media literacy activity.
- 4.7 Internet matters said that Ofcom should follow a similar approach to the Violence against Women and Girls (VAWG) reporting, producing a progress tracking framework, such as an annual report/statement or periodic review, highlighting where progress is being made and where further action is required. Internet Matters said that the report should be supplemented with case studies showing how different types of services have embedded media literacy principles effectively.²⁹⁶ REPHRAIN said that Ofcom should provide specific guides and toolboxes for developers to support their work in media literacy, which would encourage them to adopt these recommendations.²⁹⁷
- 4.8 Parent Zone, OSAN, Advertising Association and Media Smart, Information Integrity Research Network, Internet Matters and the Welsh government said that Ofcom could drive compliance by linking the recommendations to other regulatory responsibilities like the OSA.²⁹⁸
- 4.9 Both Google and OSAN said that there should be greater alignment between Ofcom and the government on a joined-up media literacy strategy, working together with technology services to streamline our approach and that this could help ensure consistency and maximum impact.²⁹⁹

²⁸⁷ [Centre for the Protection of Women Online](#), response, p.7

²⁸⁸ [National Association of Head Teachers \(NAHT\)](#), response, p.5

²⁸⁹ [Parent Zone](#), response, pp.16-17

²⁹⁰ [Shout Out UK](#), response, p.4; [Antisemitism Policy Trust](#), response, p.6; [The University of Glasgow](#), response, p.3

²⁹¹ [Shout Out UK](#), response, p.4

²⁹² [Antisemitism Policy Trust](#), response, p.6

²⁹³ [The University of Glasgow](#), response, p.3

²⁹⁴ [The Media and Information Literacy Alliance \(MILA\)](#), response, p.6; [VoiceBox](#), response, p.13

²⁹⁵ [The Economist Educational Foundation](#), response, p.2

²⁹⁶ [Internet Matters](#), response, pp.14-15

²⁹⁷ [REPHRAIN](#), response, p.2

²⁹⁸ [Parent Zone](#), response, pp.17-18; [OSAN](#), response, p.7; [Advertising Association and Media Smart](#), 2025, response, p.8; [Information Integrity Research Network](#), response, pp.6-7; [Internet Matters](#), response, pp.14-15; The Welsh Government response

²⁹⁹ [Google](#), response, p.8; [OSAN](#), response, p.7;

- 4.10 Professor Lee Edwards and Emma Goodman (London School of Economics and Political Science) said that compliance could be improved by giving specific examples of what each recommendation would mean for different services or different audiences, offering services illustrative examples of best practice, and what the minimum standards should look like. ³⁰⁰

Secondary event feedback

Many attendees at our conference workshops supported the development of common standards or accreditation for media literacy activity.

Feedback from our Media Literacy advisory panel similarly noted the potential for unintended consequences, including the risk that some services could use media literacy initiatives to bolster public perception without addressing underlying safety issues.

Our response

- 4.11 We know that there are both benefits and disadvantages to these recommendations being non-binding. Because they are non-binding, we can work more closely with online, broadcast and other content-related services as they trial, innovate and iterate their approach to media literacy. The recommendations can provide a framework that supports open dialogue about what works and a participative approach to regulation, which can support better media literacy outcomes across the population. In our view, some service providers can and should do more, hence we have not recommended a standardised approach. We go into this in further detail in the introduction of [How to promote media literacy](#).
- 4.12 The Act requires us to produce a statement of recommendations. These recommendations are non-binding, and we cannot compel services to adopt them. We will revise and review the recommendations, and we plan to complete this revision in 2029. In advance of that, we will report on how online services and broadcasters have adopted the recommendations.
- 4.13 We recognise the appetite amongst some stakeholders for Ofcom to develop an accreditation scheme. Rather than focus on inputs, we have chosen to focus on evaluation so that sector-wide learnings can be achieved from pilot programmes. Our [evaluation toolkit and outcomes banks](#) have been well-received and were updated earlier this year to include AI and news.
- 4.14 Given the range of services these recommendations apply to, we do not agree that it would be helpful to provide examples or case studies. Rather, we expect services to consider how to best apply these recommendations across their products and services using the explanatory text and tools that we have provided. Social search and gaming services may find the [Best Practice Design Principles for Media Literacy](#) provides more specifications for designers. It was co-created with experts from Google, Meta, Roblox, TikTok and Lego Group.
- 4.15 The Statement of Recommendations is an explicit requirement of the Act. It is not intended to supersede or replace any regulatory requirements placed on service providers. Service providers that fail to meet their legal obligations may face enforcement action. It should not be interpreted as a statement of Ofcom's policy on other guidance or Codes of Practice (including under the OSA), nor should it be seen as pre-empting any future policy development. It should also be noted that these recommendations are wider in their applicability, and are aimed at a broader range of service

³⁰⁰ [Professor Lee Edwards and Emma Goodman \(London School of Economics and Political Science\)](#), response, pp.6-7

providers beyond those regulated by Ofcom under the OSA, covering broadcasters, generative AI services, streaming services, etc.

- 4.16 Setting out what good looks like in the promotion of media literacy by online, broadcast and other content-related services provides a significant opportunity. We have detailed 10 clear expectations that collectively could make a material difference in supporting the population of the UK to develop media literacy skills.
- 4.17 We will be engaging with online, broadcast and other content-related service providers to explore how we can collaborate with them to creatively adopt, innovate and iterate their responses to these recommendations. We will also continue to work closely with The Department for Science, Innovation, and Technology (DSIT) and, where appropriate other government departments and devolved administrations on media literacy matters. We will revise and review the recommendations, and we plan to complete this revision in 2029. In advance of that, we will report on how online services and broadcasters have adopted the recommendations. Should we find that the non-binding nature of these recommendations prohibits progress towards the intended policy outcomes, we will highlight this to Government.
- 4.18 In addition to working bilaterally with online, broadcast and other content-related services, we look forward to working with the wider media literacy community as these recommendations are adopted. The decision to make these recommendations non-binding is a matter for Government and Parliament and is not something that Ofcom has the discretion to change.

5. Impact Assessments

- 5.1 This section sets out our final impact assessments, taking account of the stakeholder feedback and our responses.

Summary of responses

- 5.2 Stakeholders broadly supported Ofcom’s intentions but identified several areas for strengthening the assessments. Academic respondents, including REPHRAIN, said there was a need to address digital inequality through stronger accessibility and inclusion considerations, while the Centre for Protecting Women Online said there should be clearer reflection of gendered impacts and alignment with obligations under CEDAW and the Istanbul Convention to help prevent technology-facilitated violence against women and girls.³⁰¹
- 5.3 Some stakeholders highlighted the importance of going further regarding Welsh language. S4C said the recommendations should give Welsh language content greater prominence online to support equitable outcomes and strengthen opportunities to use the Welsh language.³⁰² The Welsh Government said there is need for clear Welsh language support, recognition of rural “not spots”, and more research on detecting harmful Welsh language content to protect vulnerable users.³⁰³
- 5.4 The Information Commissioner’s Office (ICO) commented on the privacy and data protection assessments. It noted further impacts and highlighted ways in which there could be more clarity regarding the ways the recommendations and existing privacy and data protection legislation complement each other. In addition, the ICO said that Ofcom should make explicit that, where appropriate, services could use anonymised data to reduce the processing of personal data and should signpost organisations to the ICO’s guidance on anonymisation.³⁰⁴
- 5.5 Civil society groups highlighted the importance of grounding assessments in lived experience. Workers Education Association (WEA) said that there is value in involving trusted charities supporting underserved communities, while the Advertising Association and Media Smart said that there should be deeper economic analysis and better coordination with regulators to avoid overlapping burdens across data protection, equality, advertising and online safety regimes.³⁰⁵ Fundamentally Children said Ofcom should better reflect the needs of children with SEND and to incorporate developmental rights such as the rights to play and participate, noting that implementation challenges may be greater than assumed.³⁰⁶
- 5.6 Industry and trade bodies noted implementation and proportionality concerns. PayPal said Ofcom’s approach was compatible with existing Financial Conduct Authority (FCA) requirements and supported emphasis on privacy-by-design and inclusion, while urging continued coordination to prevent duplication across regulatory regimes.³⁰⁷ Meanwhile, COBA said that the likely costs may be

³⁰¹ [REPHRAIN](#), response, p.8; [Centre for the Protection of Women Online](#), response, p.8

³⁰² [S4C](#), response, p.5

³⁰³ The Welsh Government response

³⁰⁴ [ICO](#) response to the How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services, 2025, pp. 6-7

³⁰⁵ [Workers’ Educational Association \(WEA\)](#), response, p.3; [Advertising Association/Media Smart](#) response pp.6-7

³⁰⁶ [FUNDamentally Children](#), response, p.6

³⁰⁷ PayPal response

higher than Ofcom anticipates, particularly regarding reporting burdens and challenges linked to AI labelling.³⁰⁸

Our response

- 5.7 We have strengthened the recommendations to better reflect how services can best promote media literacy with respect to accessibility and inclusion. This includes updating Recommendations 1 and 2 to emphasise ‘inclusive and accessible design’ and updating Recommendation 4 to encourage online and other content-related services to further engage and consult groups who are less likely to use their tools.
- 5.8 In response to feedback from S4C and the Welsh Government, around going further for Welsh language the Media Literacy Recommendations will not include Welsh-specific recommendations. We will consider the needs of Welsh language users throughout all our media literacy work to support equitable outcomes across the UK. This includes recognising local context, such as rural connectivity challenges and the need for ongoing research and evidence to better understand and address risks and harms affecting Welsh language users.
- 5.9 We recognise the need to highlight where the recommendations and existing privacy and data protection legislation complement each other. In our final impact assessment, we distinguish more fully between privacy rights under Article 8 ECHR and data protection rights. We note that compliance with data protection law, including transparency and privacy-by-design and by-default, remains a legal obligation for services irrespective of the recommendations. We have clarified this in the recommendations, noting they are intended to support approaches that minimise the processing of personal data where possible, which includes the use of anonymised data. We have signposted relevant ICO guidance on anonymisation in the assessment materials.
- 5.10 We acknowledge the importance of grounding the assessments in lived experience and of reflecting the needs of underserved groups, including children with SEND. We also note feedback on the value of coordination with trusted organisations. We will revise and review the recommendations, and we plan to complete this revision in 2029. In advance of that, we will report on how online services and broadcasters have adopted the recommendations. In this, we will take steps to review the impacts of the recommendations on those with lived experiences and revise the recommendations accordingly.
- 5.11 We are in agreement about the value of coordination with other regulators to support proportional and coherent implementation. We acknowledge the concerns raised by industry and trade bodies about potential cost and operational impacts, including in areas such as reporting and AI labelling. The recommendations are intended to support flexible, scalable approaches, and we will continue to consider proportionality and coordination as we refine our supporting materials. We have set out how proportionality will be applied in detail in the Questions and Answers section of the final recommendations.

³⁰⁸ [COBA](#), response, p. 3

Our final Impact Assessments

5.12 Having considered responses provided by stakeholders, our final impact assessments are set out below:

Impacts on businesses and general public

- 5.13 Impact assessments provide a valuable way of assessing the options for regulation and showing why the chosen option(s) was preferred. They form part of best practice policy making. This is reflected in section 7 of the Act, which requires Ofcom to carry out and publish an assessment of the likely impact of implementing a proposal which would be likely to have a significant impact on businesses or the general public, or when there is a major change in Ofcom's activities. We included this assessment in section 5 of our consultation.
- 5.14 As a matter of policy, Ofcom is committed to carrying out impact assessments in the large majority of our policy decisions and has discretion as to the substance and form of an impact assessment. Our impact assessment guidance sets out our general approach to how we assess and present the impact of our proposed decisions.³⁰⁹
- 5.15 This impact assessment is conducted in line with best practices. Given the non-mandatory nature of the recommendations, we do not anticipate a significant impact on businesses. Service providers who engage with the recommendations may incur minor administrative costs, primarily from reviewing this document. Any impact on the general public may vary, depending on the extent to which service providers choose to adopt the recommendations. In addition, some of the recommendations draw upon measures already set out in online safety regulation and data protection requirements, and services in scope of those requirements will already be expected to implement them, which means they would not impose any further impacts.
- 5.16 For those service providers that go further and implement these recommendations when they are not already following these practices, in particular Recommendations 1 to 5, additional costs may arise depending on the extent of implementation, the size and complexity of the service and the maturity of existing infrastructure. For example:
- 5.17 Services aligned with existing design standards are likely to experience minimal impact.
- 5.18 Services starting from a low baseline may face more substantial costs, including both one-off and ongoing investments. These costs could include staff time to review and redesign user journeys, deployment of new tools or updates to existing infrastructure and increased consultation efforts, both internal and external, leading to logistical and staffing expenses.
- 5.19 Similarly, new entrants may also incur more substantial costs if they have not yet embedded in their service design some recommendations as part of their initial setup.
- 5.20 Some service providers may also need to adjust aspects of their business models, in particular for Recommendations 1 to 3, which could have longer-term financial implications. For instance, service providers reliant on advertising revenue may be affected if enhanced privacy settings or time-management tools reduce the exposure or impact of advertising. Similarly, greater transparency in recommender systems or increased user control may also impact profitability of services.

³⁰⁹ Ofcom, [Impact assessment guidance](#), 2023

- 5.21 We also recommend that service providers collaborate with third parties for consultation, funding and outreach to underserved communities. The costs of such engagements, in particular with Recommendations 6, 8 and 9, will vary depending on their scope and nature. We expect larger players to take on a greater share of this responsibility, recognising that some of them are already aligning with these recommendations, ensuring proportionality across the sector.
- 5.22 Importantly, implementation of these 10 recommendations is non-mandatory, allowing service providers to adopt them in a proportionate way. Service providers retain flexibility over how much to invest and when. We expect that firms will weigh the potential costs against the anticipated media literacy benefits for people, and for themselves, and proceed where the benefits clearly outweigh the costs.
- 5.23 Despite potential costs, the recommendations, in particular Recommendations 4, 5 and 9, present opportunities for service providers. By adopting them, service providers can explore more sustainable and revenue models which enhance user trust and strengthen brand reputation. New customers may be found by making service providers more welcoming to underserved user groups today and fostering their confidence online.

Rights assessment

- 5.24 As a public authority, Ofcom must act in accordance with its public law duties to act lawfully, rationally and fairly, and it is unlawful for Ofcom to act in a way which is incompatible with the European Convention on Human Rights (ECHR) as set out in the Human Rights Act 1998. Of particular relevance to Ofcom's functions are the right to freedom of expression (Article 10) and the right to privacy (Article 8). Any interference with these ECHR rights must be prescribed by law, necessary to achieve a legitimate aim, and be proportionate to that aim.
- 5.25 We have had particular regard to these rights when developing these recommendations to ensure that the actions we recommend are appropriate and proportionate, and do not disproportionately infringe on these or other ECHR rights. The recommendations are non-mandatory, allowing service providers to adopt them flexibly and proportionally, which further mitigates any potential interference.

Freedom of Expression

- 5.26 In developing these recommendations, we have carefully considered the potential impact on freedom of expression under Article 10 of the ECHR. While the overall aim is to enhance people's ability to receive and impart information, we recognise that certain recommendations have the potential, if misapplied, to introduce indirect or unintended constraints. For example:
- 5.27 Recommendation 3 and recommendation 4 could influence how people perceive or engage with certain types of content particularly if default settings reduce exposure to diverse viewpoints, or if automated systems mislabel legitimate speech or mistakenly flag synthetic content which is authentic.
- 5.28 Recommendation 5 and Recommendation 6 may affect access to content in unintended ways if not implemented with sufficient flexibility.
- 5.29 However, if implemented as intended we do not expect the recommendations to represent a more than minimal risk of interference with rights to freedom of expression, including that of services. This is particularly the case in light of the non-mandatory nature of the recommendations, the

emphasis on giving people more control, and the expectation that service providers will adopt the recommendations in a proportionate and rights-respecting manner.

- 5.30 Overall, the recommendations are designed to promote freedom of expression by enhancing people's ability to receive and engage with information. For example, recommendations 1, 2 and 4 can improve how people understand and consume content more confidently and engage critically with news, journalistic content, and material of democratic importance, and therefore we expect positive impacts for services that host such material. In addition, online abuse and harassment, particularly affecting marginalised groups, can limit people's ability to express themselves freely. These recommendations aim to address that by encouraging service providers to provide people with tools to take control of their online experience.
- 5.31 In this context, we consider any potential interference to be justified and proportionate, in light of the significant benefits to people in the UK where the recommendations are adopted, including in enabling them to participate more actively and in an informed way online.

Privacy and data protection

- 5.32 Regarding data protection, some of the recommendations may involve the collection and processing of personal data, such as recommendations 1, 2, 4 and 5. Other recommendations such as 6, 7 and 8 do not envisage the collection or processing of personal data for their implementation. Throughout implementation, service providers should consider and where appropriate use anonymised data to reduce the processing of personal data. The ICO provides guidance on the process of anonymisation. Compliance with data protection law is mandatory and includes transparency and privacy-by-design and by-default.
- 5.33 When considering the impact on users' right to privacy more broadly, where service providers ensure that any processing is carried out in compliance with data protection law, that processing should accordingly have a minimal impact on users' privacy. Additionally, our focus on default strong privacy settings may reduce any potential interference with privacy rights. For example, services are encouraged to use non-identifiable usage patterns, contextual indicators, or aggregated behavioural signals to inform design decisions, rather than relying on direct personal data collection.
- 5.34 Some impacts on user privacy could come from any monitoring and collection of information. For example, as discussed in paragraph 5.34. Recommendations 1, 2, 4 and 5 reference personal data collection such as sign up. This could impact a user's privacy as well as implications for data protection.
- 5.35 Recommendation 4 specifically calls for the processing of metadata to identify synthetic content using tools, automatic or otherwise, to monitor and process user data, which could be categorised as personal. As noted, service providers should ensure that any processing is carried out in compliance with data protection legislation and should follow ICO guidance to consider and where appropriate use anonymised data to reduce the processing of personal data. Where the processing of this metadata by service providers is carried out in a legitimate and compliant way, any interference of privacy rights is more likely to be proportionate in assisting users to identify synthetic content from authentic.
- 5.36 Overall, we believe the recommendations strike a fair and proportionate balance between our media literacy duties and the public interest they seek to secure and protecting human rights.

Equality impact assessment

- 5.37 Section 149 of the Equality Act 2010 (the 2010 Act) imposes a duty on Ofcom, when carrying out its functions, to have due regard to the need to eliminate discrimination, harassment, victimisation and other prohibited conduct related to protected characteristics. It also requires Ofcom to advance equality of opportunity and foster good relations between persons who share specified protected characteristics and persons who do not.
- 5.38 Additionally, section 75 of the Northern Ireland Act 1998 (the 1998 Act) also imposes a duty on Ofcom, when carrying out its functions relating to Northern Ireland. Ofcom's Revised Northern Ireland Equality Scheme explains how we comply with our statutory duties under the 1998 Act.³¹⁰
- 5.39 When assessing equality impacts, we consider the impact of our proposals not only on people with protected characteristics under equalities legislation, but also on a broader range of demographic and social groups. Section 3(4) of the Act requires us to have regard to the needs and interests of specific groups. We examine the potential impact our policy is likely to have on people, depending on their personal circumstances. This also assists us in making sure that we are meeting our principal duty of furthering the interests of citizens and consumers, regardless of their background and identity.
- 5.40 We believe these recommendations will deliver meaningful benefits to a wide range of people, including those with protected characteristics and those at risk of digital exclusion. By promoting inclusive and accessible design, improving accessibility and supporting media literacy, service providers can empower a broader range of people to take control of their online experiences. This approach not only makes services more equitable but also contributes to a healthier and more inclusive digital environment. Our recommendations are designed to empower users, promote equality of opportunity, and foster positive interactions between people. Collectively, they aim to give individuals greater control over their online experiences.
- 5.41 We expect these recommendations to have a particularly positive impact on people experiencing financial disadvantage, older adults, children, and people with learning disabilities and/or cognitive impairments. These groups are more likely to require media literacy support than the general population, as evidenced by our own, and wider, research.
- 5.42 By encouraging service providers to adopt user-centric design and engage with diverse groups, the recommendations help reduce barriers to access and foster more equitable digital environments. This is particularly relevant to Recommendation 1, 2 and 3. These recommendations promote effective use of tools like blocking and muting, which may help protect users from harassment based on race, religion, or other characteristics.
- 5.43 Children benefit from age-appropriate tools, while parents are supported in Recommendations 1, 3 and 5. Marginalised groups can be included through partnerships with expert third parties, educational programming and community-based campaigns (Recommendation 6, 7 and 8). Additionally, marginalised groups may be further engaged as a result of Recommendation 4 which encourages consultation and engagement for those who are less likely to use their tools. And Recommendation 9 explicitly addresses the needs of underserved and intersectional audiences. If implemented, this recommendation could reduce barriers for people with protected characteristics

by improving accessibility and fostering collaboration with marginalised communities. Evaluation mechanisms can help to identify disparity and improve outcomes (Recommendation 10).

- 5.44 Throughout the recommendations and where relevant we have made explicit reference to other duties under the OSA. Regulated services under the Online Safety Act should consider risks to vulnerable users, including those with disabilities, when conducting their risk assessments.
- 5.45 While the overall impact is expected to be positive, we acknowledge potential risks. Poorly designed or excessive tools may create cognitive overload, particularly for younger users or those with disabilities. Similarly, if privacy settings, parental controls, or other features are implemented without sufficient expertise, user input, or testing, they may lead to user fatigue, reduce children's agency or strain parent-child relationships. To mitigate these risks, we have emphasised user-centric design, and encouraged service providers to engage with diverse user groups during development to ensure tools are intuitive and proportionate. We also acknowledge that educational content and third-party resources may not be accessible to all users if not designed inclusively. However, service providers are encouraged to use plain language, subtitling, audio description and culturally sensitive formats.
- 5.46 Finally, we recognise that no single method for improving online content credibility is without risk. Tools, such as watermarks or labels, used to indicate whether content is trustworthy or AI generated are intended to help users make informed decisions about information they encounter online. However, these tools could be misused by bad actors, for example to falsely legitimise misleading content.
- 5.47 Overall, we believe the benefits of these recommendations outweigh the potential risks and offer a valuable opportunity to advance equality of opportunity, reduce digital exclusion and foster positive relations between people with and without protected characteristics.

Welsh language

- 5.48 The Welsh Language (Wales) Measure 2011 made the Welsh language an officially recognised language in Wales. Ofcom is required to take Welsh language considerations into account when formulating, reviewing or revising policies which are relevant to Wales (including proposals which are not targeted at Wales specifically but are of interest across the UK).
- 5.49 Where the Welsh Language Standards are engaged, we consider the potential impact of a policy proposal on (i) opportunities for persons to use the Welsh language; and (ii) treating the Welsh language no less favourably than the English language. We also consider how a proposal could be formulated so as to have, or increase, a positive impact, or not to have adverse effects or to decrease any adverse effects.
- 5.50 Ofcom's powers and duties in relation to media literacy set out in the Act must be exercised in accordance with our general duties under section 3 of the Act. In formulating our recommendations, where relevant and to the extent we have discretion to do so in the exercise of our functions, we have considered the potential impacts on opportunities to use Welsh and treating Welsh no less favourably than English.
- 5.51 We have assessed the recommendations and concluded they are likely to have positive effects or increased positive effects on opportunities to use Welsh and treating Welsh no less favourably than English, with no known adverse effects.

- 5.52 We are recommending that service providers should have regard to the needs of the people in considering what languages are needed when supporting the media literacy of underserved and diverse audiences (Recommendation 9). To this extent, we consider our recommendations are likely to have positive effects or increased positive effects on opportunities to use Welsh and treating Welsh no less favourably than English. We do not consider that any adverse effects are likely to arise as a result of our proposals.
- 5.53 Overall, we believe the recommendations strike a fair and proportionate balance between our media literacy duties and the public interest they seek to secure and protecting human rights.