

Executive Summary

The Advertising Association welcomes Ofcom's consultation on media literacy recommendations. We support the broad aims of empowering users and promoting critical engagement with media content. However, we believe the proposals require more careful consideration of several fundamental tensions, including:

- The balance between user empowerment and the risk of facilitating echo chambers and harmful content consumption
- The scope of services covered and whether it adequately reflects the modern media landscape
- The tension between protection and developing genuine media literacy capabilities
- The broader societal context needed to support healthy media consumption
- The appropriate targeting of interventions (services vs. users/parents)

Introduction

1. This document presents the joint response from the Advertising Association and Media Smart to Ofcom's consultation on its proposed recommendations for online platforms, broadcasters and services titled "How to promote Media Literacy". The Advertising Association is a tripartite industry body representing advertisers, agencies and media across the UK, while Media Smart is its award-winning non-profit organisation dedicated to media literacy education for young people aged 7-21 years.
2. As key stakeholders deeply invested in promoting responsible advertising practices and equipping the next generation with critical media literacy skills, the Advertising Association and Media Smart welcome this opportunity to provide feedback on Ofcom's recommendations. It is our aim to contribute constructively to the development of a comprehensive and effective media literacy for the UK. We believe that in developing the key skills of media literacy – resilience, empathy, creativity, communication and critical-thinking – young people are also building life skills which will help them on their journey towards future employability and well-being and equip them to be successful global citizens.
3. If you have any questions related to this submission please contact both konrad.shak@adassoc.org.uk and mediasmart@adassoc.org.uk.

Your response

Question 1: Is it clear which types of organisations the 10 proposed recommendations are aimed at? Please provide reasons and evidence to support your answer.

Confidential? N

4. The consultation provides reasonable clarity in 'Section 3 Target Services' on the types of organisations targeted, including user-to-user services, broadcasting and streaming services, and generative AI services. We agree with Ofcom that the principles should apply more broadly to any service where users encounter content that requires media literacy skills
5. However, the scope as presented in the overview in Section 1 (paragraphs 1.9-1.11) may benefit further refinement. Paragraph 1.11 states that 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”.

6. However, generative AI services are not specifically referenced under the heading ‘Who should follow these recommendations’ (paragraphs 1.10-1.11) even though they are referenced in paragraph 1.9. Additionally, we feel that the focus on “online platforms and broadcasters” in paragraph 1.11 in the overview may give readers a distorted impression that the scope is more limited than Section 3 indicates.
7. We therefore recommend revising the overview language in Section 1 to explicitly include generative AI services under the ‘Who should follow these recommendations’ heading and to ensure the breadth of scope matches that articulated in Section 3.

Question 2: Do you have any comments on whether they should apply to all organisations, including those of different sizes and operating models? Please provide reasons and evidence to support your answer.

Confidential? N

8. We support a proportionate approach that recognises different organisational capabilities. However, the consultation would benefit from more specific guidance on how proportionality should be applied in practice, including:
 - Tiered implementation frameworks based on service size, reach, or risk profile
 - Minimum baseline expectations applicable to all, with enhanced expectations for larger services
 - Clear guidance to help all organisations understand their responsibilities

Question 3: Do you have any comments on the proposed recommendations? Please provide comments in particular on their effectiveness, applicability or risks. Please provide evidence to support your answer.

Confidential? N

Recommendation 1: Embed media literacy by design

9. We fully support Ofcom’s recommendation that services prioritise age-appropriate design emphasising safety for children. Children face real and serious online harms including exploitation, abuse, and exposure to age-inappropriate content. These risks require robust protection measures, and simplicity and clarity in design (paragraph 4.10) are important tools for achieving this.
10. However, we believe there is an additional dimension that deserves consideration which is to understand how protection measures contribute to long-term capability development. Ultimately, the goal should be both immediate safety and graduated development of the critical thinking skills children need as they mature. This requires calibrating protection measures to achieve both objectives simultaneously.

11. Research evidence indicates that overprotection can hinder development of critical thinking skills,^{1 2} principles that warrant consideration in digital environments. We recognise that certain serious harms require maximum technical protection at all ages regardless of development considerations (such as exploitation content or illegal material). However, beyond these highest-risk areas, children also benefit from graduated exposure to age-appropriate challenges to develop resilience and judgment. As children mature, they should progressively develop the ability to:
- Recognise manipulative content when they encounter it
 - Make difficult choices and assess risks
 - Manage the transition to adult online environments successfully
 - Exercise their own judgment alongside technical protections
12. We therefore recommend that protection measures be designed with development progression in mind, incorporating:
- Age-appropriate challenges and friction, not just simplification
 - Scaffolded learning opportunities where children can practice evaluation skills in safer contexts
 - Graduated transitions that reduce some protections as children mature and demonstrate competence (for example, adjusting interfaces and controls at development milestones such as ages 11, 13 and 16)
 - Clear guidance on how to balance immediate safety with long-term capability development
13. This approach would maintain robust protection while ensuring children progressively develop the decision-making skills they need for adulthood.

Recommendation 3: Equip people with practical tools

14. Paragraph 4.22 notes that “features such as autoplay, infinite scroll, and personalised content feeds can lead people to spend more time online than they desire”. We support Ofcom’s recommendation (Recommendation 3) for time management tools, but believe these could be strengthened by:
15. Design features that encourage intentional engagement:
- Session-based interfaces that create natural stopping points (e.g., “You’ve finished watching your selected programmes. Would you like to continue?”)
 - Clearer distinction between active and passive consumption, helping users recognise when they’re browsing vs. purposefully engaging
 - “Breathing room” in design - reducing urgency cues (such as persistent notification badges, “live now” pressures, or trending indicators without context), and allowing users to pause without fear of missing out
16. Age-appropriate friction for children:
- For younger users (under 13), built-in breaks after age-appropriate screen time periods with simple explanations: “You’ve been watching for 45 minutes. Time for a break!”

¹ Skenazy, L. (2010). *Free-Range Kids: How to Raise Safe, Self-Reliant Children (Without Going Nuts with Worry)*. Wiley. ISBN: 978-0470574751

² Segrin, C., Woszidlo, A., Givertz, M., Bauer, A. and Taylor Murphy, M. (2012), The Association Between Overparenting, Parent-Child Communication, and Entitlement and Adaptive Traits in Adult Children. *Family Relations*, 61: 237-252. <https://doi.org/10.1111/j.1741-3729.2011.00689.x>

- For teens (13-17), optional goal-setting tools: “How long do you want to spend today?” with gentle reminders

17. Transparency about engagement design:

- Clear explanations of which features are designed to extend time on service (autoplay, infinite scroll) and easy ways to disable them
- Accessible settings that default to less addictive design patterns for child accounts (e.g., autoplay disabled, infinite scroll replaced with paginated content)

18. These recommendations align with our industry’s commitment to responsible practices. The ASA already requires that advertising should not exploit children’s credulity or create artificial urgency through misleading scarcity claims.³ Extending these principles to platform design supports the same values of transparency and user respect that underpin responsible advertising.

Recommendation 4: Empower people

19. We strongly support transparency about content curation and recommender systems.

However, paragraph 1.5(b) states a core aim is that “People are empowered to shape and control their own experiences.” This raises a critical question: is it acceptable for people to deliberately seek out echo chambers, polarising content, and potentially harmful content for the sake of empowerment?

20. Empowerment implies user agency and choice. However, if users are empowered to curate feeds that exclusively confirm their biases, seek out increasingly extreme content, deliberately avoid diverse perspectives, or access harmful content, then empowerment alone may be insufficient or even counterproductive.

21. We believe, therefore, that the tension between respecting user autonomy and promoting healthier media consumption needs a more explicit acknowledgment. We suggest Ofcom consider:

- Whether pure empowerment is always desirable, or whether some “benign paternalism” is appropriate in specific contexts
- How recommendations can balance user agency with responsibility to promote exposure to diverse viewpoints
- The role of “positive defaults” that gently steer users toward healthier engagement patterns while preserving choice

Recommendation 5: Empower and support parents and caregivers

22. We strongly support parental empowerment measures in Ofcom’s recommendations.

However, the evidence suggests that service-side tools alone are insufficient. Ofcom’s own research reveals a concerning gap: while 93% of parents are aware of tools to support children online, only 76% use at least one (para 4.31). Even more striking, the number of parents setting up filters or controls increases from only 23% to 34% after a child encounters harmful content (para 4.32) – a reactive rather than proactive pattern.

³ <https://www.asa.org.uk/advice-online/children-credulity.html>

23. This evidence points to a parental capability gap, not just a tools availability gap. If parents lack the skills, confidence, or understanding to implement tools effectively, service-side recommendations alone will not translate to protection for children. We therefore recommend:
24. **Specific parent-focused media literacy support.** Services should be encouraged to invest in practical resources that build parental capability, including:
- Step-by-step guides with screenshots showing how to implement parental controls on major platforms (recognizing parents may be less digitally confident than their children)
 - Age-specific guidance explaining what risks are developmentally appropriate to discuss with children at different ages (7-10, 11-13, 14-17)
 - Conversation starters and scripts to help parents discuss online safety topics (e.g., “How to talk to your 9-year-old about influencer marketing”, “Discussing online privacy with teenagers”)
 - Regular webinars or online workshops demonstrating tool implementation and addressing common parental concerns
25. While services can provide these resources directly, we also recommend:
26. **Partnership with trusted parent-facing organisations.** Rather than services developing all parent education in-house, Ofcom should encourage partnerships with established organisations that already have parental trust and expertise, (e.g. NSPCC and Media Smart). Media Smart partnered with TikTok to deliver a parents digital safety campaign / resource⁴ which has attracted 50 million views since launch. Media Smart will also be running a pilot of the programme offline with more non-English speaking parents and is expected to finish at the end of January 2026. These organisations are better positioned to:
- Reach parents who may be sceptical of guidance from the platforms themselves
 - Provide independent, non-commercial advice
 - Deliver culturally sensitive support to diverse parent communities
 - Offer sustained engagement rather than one-off information provision
27. **Integration with existing parent touchpoints.** Parent education should reach parents where they already are, including:
- School communications (newsletters, parent evenings, PSHE curriculum)
 - Healthcare settings (GP surgeries, health visitor contacts)
 - Community centres and libraries
 - Workplace employee assistance programs for working parents
28. **Evidence of effectiveness.** Services that invest in parent capability building should evaluate and report on outcomes, including:
- Whether parents who receive targeted support are more likely to implement controls proactively rather than reactively
 - Which formats and delivery mechanisms are most effective for different parent groups
 - How parent capability building complements service-side protections in achieving safer outcomes for children

⁴ <https://mediasmart.uk.com/tiktok-teens-social-media-and-you/#>

29. This approach would support child protection through both well-designed service-side tools (Ofcom's current focus) and parental capability to use them effectively (currently under-addressed). Moreover, this represents a sustainable model: empowered parents become partners in online safety rather than a source of service complaints or regulatory concerns.

Question 4: Are there any other additional recommendations you think we should consider? If so, please provide evidence to support your comment.

Confidential? N

30. The consultation gives limited attention to advertising and commercial content literacy. Understanding how advertising works, how to recognise sponsored content, and how commercial models shape media is a crucial media literacy skill.

31. We would welcome:

- Explicit recognition of commercial/advertising literacy as a component of media literacy
- Recommendations for clear labelling and explanation of advertising and sponsored content
- Recognition of industry self-regulation through ASA/CAP/BCAP as part of the media literacy ecosystem

Question 5: Do you have any examples or suggestions of ways of encouraging services to adopt these recommendations?

Confidential? N

32. Given the non-mandatory nature of the recommendations, we suggest:

- Reputational incentives: Public recognition schemes or awards for excellence
- Industry leadership: Leveraging trade associations to promote adoption among members
- Regulatory linkages: Considering implementation as a positive factor in other assessments
- Graduated expectations: Starting voluntary but indicating poor uptake might lead to mandatory requirements

Question 6: Do you have any comments on our impact assessment, rights assessment, equality impact assessment and Welsh language assessment? Please provide evidence in support your answer.

Confidential? N

Business Model Impacts

33. Paragraph 5.5 notes that advertising-funded services may be affected. The economic sustainability of free, ad-supported services depends on advertising effectiveness. If recommendations significantly impair this without providing alternative sustainability models, results could include reduction in free services, disadvantaging users who cannot afford subscriptions, and potentially less transparent monetisation models.

34. We suggest Ofcom conduct more detailed economic impact analysis on advertising-funded services and consider how to balance media literacy goals with sustainable business models.

35. Given that these media literacy recommendations interact with Online Safety Act duties, UK GDPR, Equality Act requirements, and advertising regulation, we strongly encourage Ofcom to coordinate with ICO, CMA, ASA and other regulators to align expectations and avoid cumulative burden.

Conclusion

36. The Advertising Association and Media Smart supports Ofcom's goals of promoting media literacy across the UK. We believe the recommendations provide a valuable framework but require refinement to address:

- The fundamental tensions between empowerment and protection, particularly for children
- The balance between online controls and offline alternatives
- The targeting of interventions at services vs. users/parents
- The sustainability of advertising-funded service models
- The interaction with other regulatory regimes

37. We would welcome continued engagement with Ofcom on these issues and stand ready to work collaboratively with the regulator, industry partners, and civil society organisations to promote effective media literacy across the UK.

About the Advertising Association

The Advertising Association promotes the role and rights of responsible advertising and its value to people, society, businesses, and the economy. We bring together companies that advertise, their agencies, the media and relevant trade associations to seek consensus on the issues that affect them. We develop and communicate industry positions for politicians and opinion-formers, and publish industry research through advertising's think-tank, Credos, including the Advertising Pays series which has quantified the advertising industry's contribution to the economy, culture, jobs, and society.

The membership of the Advertising Association is very broad and includes the associations representing industry sectors, such as the advertisers (through the Incorporated Society of British Advertisers), the agencies and advertising production houses (through the Institute of Practitioners in Advertising and the Advertiser Producers Association), all the media (from broadcasters and publishers, cinema, radio, outdoor and digital), advertising intermediaries and technology providers (which include platforms and the IAB UK), market research (through the Market Research Society) and marketing services (through the Chartered Institute of Marketing).

About Media Smart

Media Smart helps young people understand advertising wherever it appears and inspires them to consider the sector as a career choice.

It is an award winning, not-for-profit, education programme funded by advertisers, agencies, media owners, tech companies and trade associations which provides empowering guides for 7-25 year olds, engaging teaching resources and expert advice for parents and guardians.

ADVERTISING ASSOCIATION **MediaSmart**

The programme provides free educational resources for teachers, schools, parents/guardians and digital campaigns direct to its youth audience. Subjects include social media, digital advertising, political advertising, scam ads, greenwashing, body image, influencer marketing, creative careers and piracy which are delivered in the classroom, assembly, youth club or at home.

Media Smart also inspires – and provide pathways for – all young people to enter the working world of advertising and media, driven by their increased knowledge, understanding and curiosity about this industry landscape.

Media Smart was incorporated into the Advertising Association in 2023.

Context

Advertising and marketing are important. They play a crucial role in brand competition, drive product innovation and fuel economic growth. Many industries such as the arts, sport and culture depend on it for their revenues, and it also funds a diverse and pluralistic media, including a free and open internet, enjoyed by consumers of all ages, including children and young people.

Advertising is also a driver of economic growth and competition. We have previously estimated that every pound spent on advertising returns up to £6 to GDP through direct, indirect, induced, and catalytic economic effects. The Advertising Association/WARC Expenditure Report UK's ad market will grow by a further 5.9% in 2024, to reach a total of £39.2bn – a new high and equivalent to a 2.5% rise in real terms. This would mean a contribution of approximately £235bn to the economy supporting over 1 million jobs across the UK.

According to Deloitte research carried out on behalf of the Advertising Association, the one million jobs supported by advertising can be broken down as follows:

- a. 350,000 jobs in advertising and the in-house (brands) production of advertising.
- b. 76,000 jobs in the media sectors supported by revenue from advertising.
- c. 560,000 jobs supported by the advertising industry across the wider economy.

Advertising can be both creative and inspiring. Given that young people are growing up in a world of commercial messaging that touches most areas of their lives – it is more important than ever that they understand exactly what is being suggested, promised and sold to them. To date, there have been a total of 96,618 Media Smart resource downloads with a factored reach of 5,797,080. Additionally, there have been 18,303 users registered on the Media Smart website.

5 December 2025

Please tell us how you came across about this consultation.

- Email from Ofcom

Please complete this form in full and return to MSOM_SoR_Consultation@ofcom.org.uk.