

Consultation response form

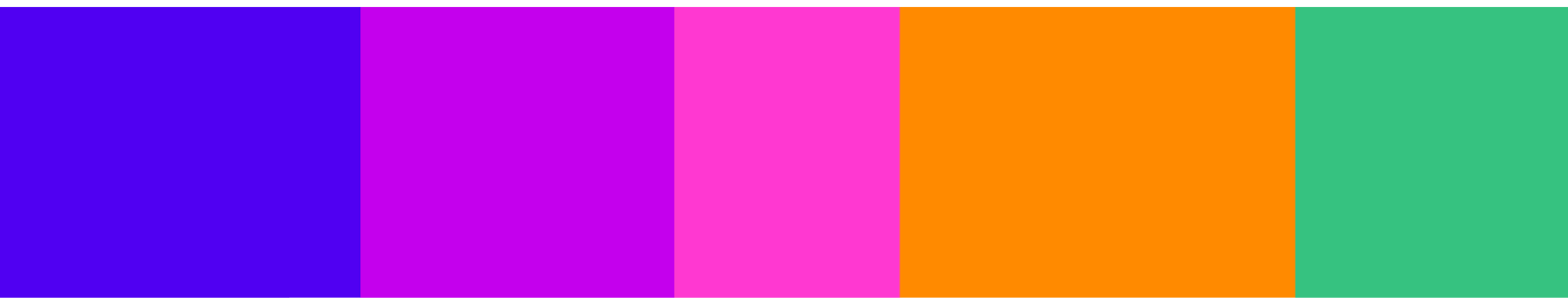
Please complete this form in full and return to [MSOM SoR Consultation@ofcom.org.uk](mailto:MSOM_SoR_Consultation@ofcom.org.uk).

Consultation title	How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services
Full name	Charlotte Doyle, Policy Advisor
Contact phone number	
Representing (delete as appropriate)	Organisation
Organisation name	British Film Institute (BFI)
Email address	

Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Nothing
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None
For confidential responses, can Ofcom publish a reference to the contents of your response?	N/A



Your response

Question	Your response
<p>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.</p>	<p>Confidential? – N</p> <p>The British Film Institute (BFI) is a cultural charity, a National Lottery Distributor and the UK’s lead organisation for film and the moving image.</p> <p>We operate our own video-on-demand platform, BFI Player, which showcases the best new independent cinema worldwide and classic UK film. BFI Player has an established subscriber base in the UK and a growing foothold in international streaming markets. We also run BFI Replay, our archive video streaming service exclusively available in UK public lending libraries.</p> <p>Our mission includes using our knowledge to educate and deepen public appreciation and understanding of film and the moving image. Enhancing media literacy through critical analysis, interpretation and storytelling is an important part of this work, and we are supportive of Ofcom’s aim to empower the public with the skills needed to critically and safely engage with media.</p> <p>Ofcom's focus on online platforms, broadcasters and services for promoting media literacy is generally clear in the recommendations. We support Ofcom’s intent for a unified approach to reflect the interconnected nature of the digital ecosystem and online experiences.</p> <p>We consider it would be beneficial to have greater clarification in the recommendations on:</p> <ul style="list-style-type: none">• Ofcom’s reference to entities that “reach significant UK audiences”. Many online platforms have a comparatively small or more curated offering than that of Public Service Broadcasters (PSBs) or large streaming services. The BFI's own BFI Player and the BFI YouTube channel receive over 10m annual streaming views, with around 3m followers across our social channels. Our websites serve more than 7.5m UK and 16m worldwide sessions per year. While significantly smaller than major platforms, we still reach sizeable and diverse audiences in the UK.• The role of public institutions, alongside Public Service Broadcasters, that enable the creation,

Question	Your response
	<p>hosting and distribution of content through online platforms, including archives and libraries. For example, BFI Replay, the BFI’s free-to-access digital archive, is exclusively available in UK public lending libraries showcasing thousands of digitised videos and television programmes from across the UK. The BFI National Archive, alongside partner UK regions and nations film archives, promotes media literacy through public engagement and education, with archival content offering a valuable tool for teaching and engaging with the UK’s history.</p> <ul style="list-style-type: none"> • The range of audio-visual platforms and technologies that offer gaming, interactive and video-sharing services online. For example, while online games are referenced in Section 3 as a Targeted Service, it would be helpful if the recommendations considered and expanded on how they apply to video games, XR and other interactive media as specific online mediums. Video games are now a daily part of life for millions across the UK, with over 3.4 billion players globally, ¹ and we note Ofcom’s findings on the effectiveness of video games in engaging young people with media literacy. ² Video games offer educational content and can model effective moderation and community guidelines.
<p>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.</p>	<p>Confidential? – N</p> <p>The BFI supports the recommendations being applied to all organisations, though a proportionate approach should be taken when applying them to organisations of varying size. Breadth and flexibility help to ensure their relevance to the diverse range of entities that create, host and distribute content and media, and the rapidly evolving ways online content is consumed.</p>

¹ UK Interactive Entertainment (Ukie) - written evidence (MLI0035) to the House of Lords Communications and Digital Select Committee inquiry: Media literacy, committees.parliament.uk/writtenevidence/140299/pdf/

² Ofcom, Exploring high media literacy among children and adults (December 2023), p 14: <https://www.ofcom.org.uk/site-assets/resources/documents/research-and-data/media-literacy-research/adults/high-media-literacy-among-adults-and-children/exploring-high-media-literacy-among-adults-and-children?v=330526>

Question	Your response
	<p>We consider it will be important to ensure the recommendations reflect the broad ecosystem of stakeholders working with online platforms, broadcasters and services to advance media literacy – including educators, libraries, video games, and the screen sector.</p> <p>Organisations in the screen sector, including the BFI, play an important role in promoting media literacy, interpretation and understanding. Film and screen culture is one of the most accessible, democratic and popular art forms, and helps people interpret the world around them.</p> <p>BFI Player, our video-on-demand streaming service, showcases a programme of classic, cult and archive films to at-home audiences. In 2024/25, BFI Player achieved its highest number of subscribers and engagement figures to date with over 3 million feature film views. In Screen Culture 2033, we committed to developing our next generation streaming service which is being designed to enable users across the UK and around the world to enjoy screen culture on demand.</p> <p>As a smaller service provider, with ambitions to promote diverse screen culture alongside commercial success, we welcome Ofcom’s intention for the recommendations to be proportionate. Small service providers – including public organisations, small and medium-sized enterprises and independents – make significant contributions to media literacy. As recognised in <i>Recommendation 8</i>, they can offer essential local or regional knowledge that ensures media literacy is promoted to meet different needs and contexts across the UK.</p> <p>However, smaller organisations often operate with significantly constrained funding. We note this could inhibit their ability to implement some recommendations proposed that may go beyond the organisations business-as-usual and would likely carry significant cost, particularly investment in campaigns and evaluation that go beyond business-as-usual activity.</p> <p>As a result, we consider expectations or requirements for collaboration, information sharing and shared responsibilities between organisations in the recommendations will support their effective implementation. The BFI as the UK’s lead body for film can help support collaboration across the sector.</p>

Question	Your response
<p>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.</p>	<p>Confidential? – N</p> <p><u>Design for better user choice – Recommendations 1 and 2</u></p> <p>We welcome Ofcom’s user-centred structure and approach in the recommendations. In our ten-year strategy <u>Screen Culture 2033</u>, the BFI shares this ambition to develop a culture and practice of user-centred service design.</p> <p>We strongly support the emphasis on inclusive design choices in <i>Recommendation 1</i> as a foundational principle in service architecture and policy, and consider it will be feasible to implement for service providers.</p> <p>BFI Player already embeds media literacy by design through:</p> <ul style="list-style-type: none"> • Providing a clean, simple interface and wide-spread subtitles, supporting users with hearing impairments and those with lower digital confidence. We have external accessibility testing from WCAG certified 3rd parties like Zoonou. • Including BBFC ratings with content – the service is for 16+ and has contractual restrictions on the use of the service by children with a self-declaration to accept the age classification and/or guidance on each film. • Ensuring pricing, content ratings, sensitive content, and rental vs subscription distinctions are clearly communicated. <p>As we continue to develop BFI Player, we are committed to basing decisions on user research and usage data, enabled by effective and secure systems for collecting, managing and interpreting data insights.</p> <p>We support the proposal that service providers adopt and publish a ‘media literacy by design’ policy and practice. However, the success of putting inclusive design into practice will depend on resourcing. At the BFI, our ambitions for change in the design of our digital platforms will take time as we secure funding and software platform development capability. Support for service providers to adapt their service architecture will therefore be important for meaningful and inclusive digital design.</p> <p>In response to <i>Recommendation 2’s</i> suggestions to help users understand the content in their feeds, we note that</p>

Question	Your response
	<p>online platforms can produce and curate content in a range of ways. Our video-on-demand services, including BFI Player, do not use recommender systems. Instead, they present a curated programme with unique contextual editorial content that draws on the knowledge of our programmers, curators, members and guest talent. This supports media literacy, and understanding of cinema history, and could offer a model for other similar service providers.</p> <p><u>During use – Recommendations 3-6</u></p> <p>We support the recommendations aimed at empowering people during active engagement with content and features.</p> <p>Through BFI Player, we will be able to meet <i>Recommendation 4</i> as our curated catalogue promotes cultural and historical understanding through promoting a diverse range of content, showcasing the breadth of the UK, and a wide range of storytelling.</p> <p>We consider <i>Recommendation 5</i> is most effective if educators are empowered to support younger users, alongside parents and caregivers – please see our response to Question 4 below.</p> <p>In response to <i>Recommendation 6</i>, we collaborate closely with educators to share our content, including partnerships with higher education institutions – please see our response to Question 4 below.</p> <p><u>Build trust beyond the service – Recommendations 7-9</u></p> <p>We support Ofcom’s recommendations for services to actively promote trusted educational content, partner with expert organisations and invest in media literacy initiatives that reach and reflect the diversity of the UK’s communities.</p> <p>We consider <i>Recommendation 7</i> should not be limited to PSBs or VOD platforms as many other platforms now act as primary sources of educational content including video games, video sharing platforms, and archives.</p> <p>Video-sharing platforms, such as YouTube and TikTok are key distributors of content, especially for children and young people. As Ofcom’s research has found, 4-15 year old children in the UK spend significantly more time watching YouTube than all PSB services combined. While</p>

Question	Your response
	<p>PSBs release content for children on YouTube, there are also several UK content creators and independent production companies making content for children and young adults on YouTube – for example, <i>Sidemen</i>, <i>Zoella</i> and <i>Joe Sugg</i> have grown their platforms to have mainstream success, with their own media companies working in partnership with established broadcasters.</p> <p>Film and TV can also support <i>Recommendation 7</i> as trusted educational content that fosters critical analysis, interpretation and storytelling, including through archival or historical content. For example, the BFI’s National Film and Television Archive has a rich collection that, with innovations in access, can be an engaging tool for teaching and engaging with contemporary media.</p> <p>We support Ofcom’s encouragement in <i>Recommendation 8</i> of service providers to support media literacy through partnerships with trusted organisations, and to actively support long-term funding of skills-building programmes.</p> <p>We strongly encourage Ofcom to more explicitly recommend collaboration with educators – see our response to Question 4 below.</p> <p>Public libraries also hold valuable and trusted relationships with families and communities as potential collaborators with media platforms.</p> <p>We commend Ofcom’s recognition of the importance of local knowledge, and encouragement for online platforms to build local partnerships, including with grassroots community groups.</p> <p>The BFI is looking to partner with online video platforms to expand channels, including through which people can access learning. Through National Lottery funding, the BFI supports Into Film, a film education charity that provides educators with resources to capitalise on the expansive power of film and the moving image as a learning tool, including tailored materials that address online safety. 94% of educators said Into Film gives pupils a greater understanding of others – demonstrating the power of film in fostering empathy and the benefits of a diverse film culture (https://www.intofilm.org/about). Into Film+ is a free streaming platform, designed specifically for schools, with a wider range of films, shorts, documentaries and TV programmes. The platform is already used by thousands of</p>

Question	Your response
	<p>educators and could help support a greater use of film within the national curriculum.</p> <p>Through our role as custodian of the National Film and Television Archive and promoter of screen heritage, the BFI also has a rich collection that, with innovations in access, can be an engaging tool for teaching and engaging with the modern history of the UK.</p> <p>We support the objectives of <i>Recommendation 10</i>. However, we note that evaluation is resource intensive for smaller organisations and may require upskilling staff or external commissioning.</p>
<p>Question 4: Are there any other additional recommendations you think we should consider? If so, please provide evidence to support your comment.</p>	<p>Confidential? – N</p> <p>We would encourage Ofcom to consider a recommendation that encourages online platforms, broadcasters and services to partner with educators and educational programmes.</p> <p>We recognise Ofcom does not hold responsibility for national curriculum or education policy across the four nations of the UK, nor for spending decisions. However, educators and education will be essential for the recommendations to meaningfully promote media literacy.</p> <p>Fostering media literacy skills through education, and re-education, is crucial for equipping individuals with the skills and understanding to navigate the complexities of the digital world and ensure safe and responsible engagement with all media forms.</p> <p>We welcome the Government’s recent announcement that media literacy will be explicitly introduced to the national curriculum in England as part of compulsory citizenship from primary age. In Scotland, qualifications at SCQF Levels 3-6 have already been developed to enable learners to understand and develop media literacy skills through analysis and creation of media content.</p> <p>An additional recommendation could include ensuring the technology, resources and programmes of platforms, broadcasters and services are accessible as educational tools for teaching media literacy in schools and further education, and as a feature of teacher-training and continuing professional development for educators.</p>

Question	Your response
	<p>For example, as part of our commercial partnerships, BFI Player offers tailored projects and educational access to its video on demand service, through ambitious higher education partnerships and subscriptions. We work with universities throughout England – including Durham University, University of Cambridge, and LSBU – to bring BFI Player to over 50 higher education institutions. We work with departments, faculties or cross-institutionally to deliver benefits throughout the academic year, including masterclasses, workshops, and briefs and knowledge exchange.</p> <p>Film education has a significant role in promoting media literacy. It provides people with the critical skills needed to interpret video content, including perspective, bias, provenance and editing techniques – all skills crucial to counter online disinformation. Engaging with challenging, historic and diverse screen culture enhances critical thinking, and fosters positive human and social connection. Teachers can help students to develop life-long, positive and joyful relationships with media.</p> <p>Partnerships between online video platforms and educators can significantly expand and strengthen the promotion of media literacy. We encourage Ofcom to ensure education is a focus area throughout the recommendations.</p>
<p>Question 5: Do you have any examples or suggestions of ways of encouraging services to adopt these recommendations?</p>	<p>Confidential? – N</p> <p>As discussed in the House of Lords Communications and Digital Committee ‘Media Literacy’ Report published July 2025, we recognise Ofcom currently has limited legislative authority to ensure formal accountability and transparency for media literacy from platforms and services. However, we consider the recommendations could be underpinned with stronger requirements or mandates to ensure their effectiveness.</p> <p>For example, Ofcom could require its regulated services to comply with the recommendations, including in alignment with the new mandates for visibility of PSB content under the Media Act 2024.</p>

Question	Your response
	<p>The BFI Diversity Standards have successfully encouraged partners to adopt practices that advance equality of opportunity and address under-representation in the screen industries.</p> <p>The Standards have been adopted by BBC Film, Film4 and Screen Scotland, making them a requirement for the majority of selective public funding for film production in the UK. Paramount Pictures are committed to meeting the Standards for its UK-based feature film productions. Achieving the Standards is also an eligibility requirement for various British categories in the BAFTA Film, Television and Games Awards. The British Independent Film Awards (BIFA) apply the Standards to all British categories.</p> <p>The successful adoption of the Standards is due to its flexible framework, and mandatory compliance as a contractual requirement for all BFI funding.</p>
<p>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.</p>	<p>Confidential? – Y / N</p> <p>None.</p>

Please tell us how you came across about this consultation.

- Email from Ofcom
- Saw it on social media
- Found it on Ofcom's website
- Found it on another website
- Heard about it on TV or radio
- Read about it in a newspaper or magazine
- Heard about it at an event
- Somebody told me or shared it with me
- Other (please specify)

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