

Consultation response form

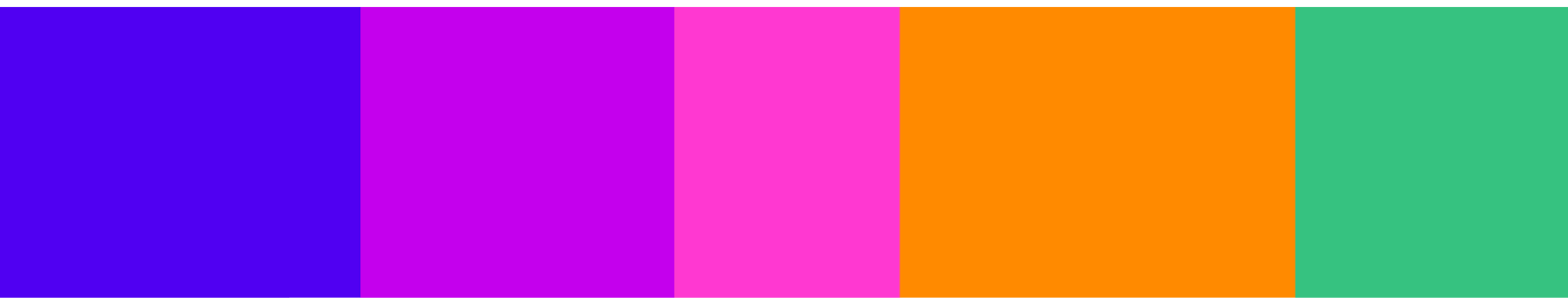
Please complete this form in full and return to [MSOM SoR Consultation@ofcom.org.uk](mailto:MSOM_SoR_Consultation@ofcom.org.uk).

Consultation title	How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services
Full name	Dr. Elinor Carmi
Contact phone number	
Representing (delete as appropriate)	Self
Organisation name	City St. George's, University of London.
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?	Yes



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>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>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> <ol style="list-style-type: none"> 1. Social media platform are profit driven organisations and have been the main source for online harms. Therefore, expecting them to develop media literacy programmes will not work. Citizens of all ages, and not just children and young adults, should have access to non-commercial organisations who can support them on media literacy. 2. As a society, we are beyond the point of hoping that social media companies will adopt recommendations, because these companies have been failing people and democracies for over a decade. Therefore, in order for social media companies to change how they currently operate, we need stricter rules and enforcement. These companies need to gain the public's trust and prove they have society's wellbeing at heart. 3. Many of the recommendations offered have been issues that platforms have promised to tackle but haven't - from the failed Ad Library project and onto transparency, 'privacy by design', clearer terms of use or meaningful choices such as the consent mechanism – all have not been respected or applied by these companies, so why repeat recipes that do not work? 4. The current enforcement of big platform is inefficient because financial penalties for companies

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	<p>who earn potential fines within days is not deterring them. Moreover, we see over and over again that they repeat the same harmful practices precisely because the regulation and enforcement are not deterring enough.</p> <ol style="list-style-type: none"> 5. Improving media literacy also needs to come hand in hand with a better media ecosystem where journalists and trusted organisations have enough resources and trust so that people can use them. This also means that social media platforms must give trusted news sources and organisations prioritisation on their feeds. 6. People should be able to know, access and understand exactly what data companies hold on them and who they trade them with. This is because as I show in my research with Simeon Yates from Liverpool university – most people do not know basic terms and what they mean such as data and web-cookies. It should not be something that requires additional legal instruments (such as FOIA), it should be easily accessible and presented so people can understand and able to ask for them to be erased. This is obviously already enshrined in the GDPR, but is, again, never respected by companies. 7. But, this also means that the current business model of social media platforms of surveillance ad-tech needs to change as that is the main cause of most online harms. When the business model is built on spying on people over time and platforms, extracting their data and trading it while increasing engagement and attention - then there is no incentive for meaningful engagement online and we will see more disinformation, conspiracy theories and hate online – because it sells.
<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> <ol style="list-style-type: none"> 1. Charging big social media platform a tax from their earnings that will be directed to local media literacy organisations, libraries and local news who should be strengthened to provide media literacy to their communities.

Question	Your response
	<ol style="list-style-type: none"> 2. Outlaw the current business model of social media platforms. 3. Sharing of people's data or using it to train AI should always be opt-in and not opt-out. 4. Whenever there is a change in privacy or personal data settings this should be prompted to people and provided with a short explanation video and how people can change that.
<p>Question 5: Do you have any examples or suggestions of ways of encouraging services to adopt these recommendations?</p>	<p>Confidential? – N</p> <ol style="list-style-type: none"> 1. Recommendations do not work, we need specific conditions where if companies do not abide they get suspended for a certain period of time in a particular region. 2. Regulation and enforcement. 3. Outlaw fraud ads on social media platforms. Reuters recently revealed that Meta earns billions from fraud ads while knowing that they are fraud and harmful, this is unacceptable. 4. Stricter laws on the types of ads that can be presented on platforms. 5. Stricter laws on transparency that influencers should abide about the type of money they get to promote products and ideas. 6. Social media platforms have ended multiple checks and balances groups they hired, such as ethics committees, content integrity, content verification and others. Therefore, they should not be expected to collaborate with other organisations while we hope they will adopt their expertise. It is a bit like expecting platforms to mark their own essays, as an academic I would not let me students mark their essays, so why should social media platforms be allowed to? 7. Instead, Ofcom should set-up an independent audit organisation that will consist of academics, journalists, librarians, and other literacy organisations who will have unrestricted access to social media platforms data and execute quarterly audits. The organisation will pay these people through the tax taken from social media platforms.

Question	Your response
	<p>8. Encourage users to take action when they encounter harmful content or exploitative practices, one way to do that is to show tutorials of how to do that.</p> <p>9. Offer transparency of how many complaints/flags were made on a specific ad or piece of content to be shown next to the ad/content.</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? – N</p>

Please tell us how you came across about this consultation.

- Email from Ofcom
- Saw it on social media
- X 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)

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