

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	Adam Minns
Contact phone number	
Representing (delete as appropriate)	Organisation
Organisation name	COBA
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 / No

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>We believe so. We support how Ofcom has set out these recommendations as best practice, for organisations to aspire towards.</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>We welcome Ofcom's stated intention that recommendations are aimed at being proportionate, with the scale of the service in question being taken into account. It is important to recognise many services are relatively small, with limited revenues, or may be specialist and highly focused, with varied expectations from audiences. This should all be taken into account when introducing new rules or guidance.</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>Whilst we support the aim of increasing public awareness around AI, it is important to recognise that AI has benefits, such as enabling content providers and platforms to introduce access services cost-effectively and efficiently, or supporting the creative process at early stages. AI labelling should be targeted at high-risk content where there is a potential for harm or deception.</p> <p>We also ask Ofcom to reconsider the recommendation for businesses to publish an annual statement on their media literacy activities. Aside from the effective cost and the commercial sensitivities, this seems at odds with the Government's drive to decrease regulatory burden for businesses.</p>

Question	Your response
<p>Question 4: Are there any other additional recommendations you think we should consider? If so, please provide evidence to support your comment.</p>	n/a
<p>Question 5: Do you have any examples or suggestions of ways of encouraging services to adopt these recommendations?</p>	n/a
<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>We do not agree that service providers face only minor costs, or that these stem primarily from reviewing the briefing documents. As noted above, the reporting recommendation is potentially onerous, while AI labelling has the potential to be problematic.</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)

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