



Consultation response form

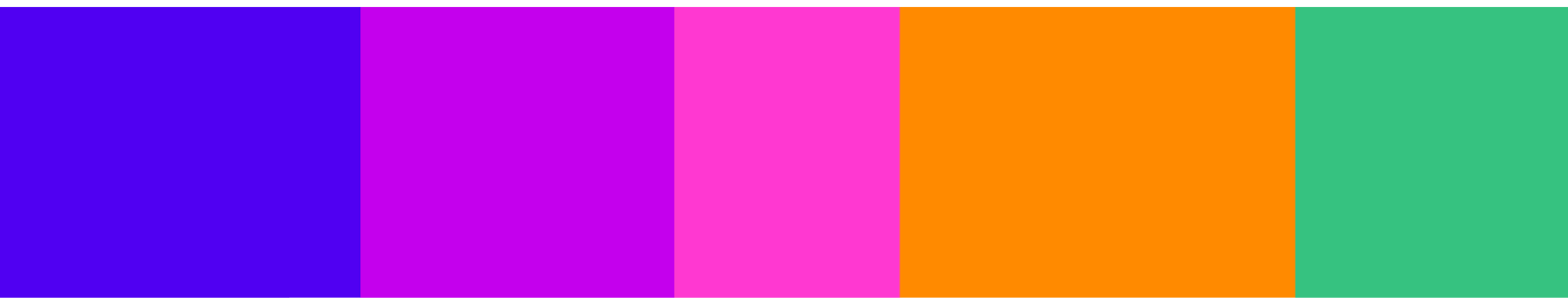
Please complete this form in full and return to [MSOM SoR Consultation@ofcom.org.uk](mailto:MSOM_SoR_Consultation@ofcom.org.uk).

Consultation title	How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services
Full name	Tommaso Rabitti
Contact phone number	
Representing (delete as appropriate)	Organisation
Organisation name	Council for Countering Online Disinformation (CCOD)
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>Yes</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? – Y / 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> <p>The CCOD believes the proposed recommendations are suitable and welcome. With regards to recommendations no 7 and 8 in particular, we believe a joint, coordinated approach is needed. Indeed, media literacy campaigns and interventions must not put the burden on individuals alone. In this regard, DSIT only allocated £2 million split across 13 organisations as part of its year 3 online media literacy action plan from 2023-24. Notably, this is a very small fraction of potentially available funds considering the DSIT R&D budget for the same year stood at £13.9 billion. A greater budget coupled with a focus on fewer, perhaps more targeted interventions could be a welcome way of addressing the effectiveness of building trust in society beyond services.</p> <p>The Curriculum and Assessment review Final Report, the suggestions therein which the Government will be rolling out over the next few years, is a positive step forward in this regard as it strengthens media literacy in the curriculum.</p> <p>In order to maximally enhance the downstream effectiveness of recommendations 7, 8 and 9, we believe media literacy in the education curriculum should start early in reception. This approach, for example - including dedicated classes on media literacy with a focus on developing discernment skills - enables Finland to consistently lead the European leader board on the media literacy index.</p>

Question	Your response
	<p>Dedicated media literacy classes exploring issues such as conspiracy theories, propaganda, and disinformation are needed to help children develop the skills that will allow them to be conscious and capable users of regulated services when they grow up.</p> <p>Research from Mubashir Sultan finds that analytical skills increase the ability to discriminate between true and false content¹. Indeed, in parallel and alongside dedicated media literacy modules in the curriculum, educators should consider opportunities to foster critical thinking skills associated with media literacy in other subjects too. This can be done, for instance, by leveraging existing critical thinking portions of traditional subjects as much as possible to enhance adoption and understanding of analytical skills.</p> <p>For example, lessons on manipulation of statistics in maths and analysis of sources in history are already used as vehicles to teach media literacy discernment skills in Finland according to the Finland Promotion Board.</p> <p>The CCOD believes an effective way of further promoting media literacy campaigns beyond services is to focus on gamification techniques for both adults and youths. These have proven to be effective in a number of studies at increasing participation and retention.</p> <p>Gamification strategies have increased engagement levels through humor and gaming according to evidence given to the House of Lords Digital and Communications Committee. Gamification interventions can help increase participation rates; according to the Alan Turing Institute, in 2024, only 3% of the public have taken a media literacy course and 7% have used self-help resources to support fact checking efforts.</p> <p>Moreover, feedback exercises post-play in gamification-based interventions led to improved detection accuracy,</p>

¹ Mubashir Sultan et Al. *Susceptibility to online misinformation: A systematic meta-analysis of demographic and psychological factors* (2024). <https://doi.org/10.1073/pnas.2409329121>

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	<p>pointing to how continuous feedback and multiple interventions improve outcomes². Further, gamification interventions within secondary school settings have been found to foster positive attitudes among students with respect to trusted news sources³.</p> <p>The CCOD believes that ‘building trust beyond the service’ requires a whole-of-society approach that starts with teaching media literacy early and effectively in schools, but also strives to reach older audiences through interventions like a media literacy tool for workforces to be developed by the private sector.</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>The CCOD believes that additional measures under the ‘Design for better user choice’ pillar would be welcome. Specifically, increased user empowerment features on social media services to enable adult users to mitigate the most pernicious aspect of algorithms. Indeed, filter bubbles exacerbate the threat of disinformation by trapping individuals in an informational echo chamber that constantly reinforces their beliefs. Within these limited informational spaces, evidence suggests that individuals are more likely to be exposed to mis- and disinformation, and — if it aligns with their worldview — become more susceptible to it.</p> <p>With regards to points 4.17 and 4.19 in the Consultation document, the CCOD proposes a ‘news prominence’ filter bubble design intervention. This would essentially be a tool within users’ feeds that would allow them to</p> <ol style="list-style-type: none"> 1) filter out content that does not meet international journalistic standards on factual accuracy and;

² Johannes Leder et al. *Feedback exercises Boost Discernment of Misinformation for Gamified Inoculation Interventions* (2024). [10.1037/xge0001603](https://doi.org/10.1037/xge0001603). See also Almog Simchon, Sander Van der Linden et al. *A signal detection theory meta-analysis of psychological inoculation against misinformation* (2025).

³ Werner Axelsson et al. *Bad news in the civics classroom: how serious gameplay fosters teenagers’ ability to discern misinformation techniques* (2024). <https://doi.org/10.1080/15391523.2024.2338451>

Question	Your response
	<p>2) suggest news content of a different viewpoint to prevent algorithms from rewarding extremist content and one-sided engagement</p> <p>This intervention should rely on pre-existing media and journalistic codes of conduct, principally the Ofcom Broadcasting Code and the IPSO Editors' Code of Practice. These regulations already provide a strong foundation for managing balance and accuracy in traditional media.</p> <p>Under this system, users will still enjoy the freedom to choose what outlets/narratives they wish to engage with, but social media platforms and search engines will be legally required to give users access to toggles for prominence to trusted sources in their search results and algorithms, alongside other viewpoints. This is important because it will allow trusted sources and alternative worldviews to “burst” through the filter bubbles, helping users engage more regularly with reliable, accurate sources and balanced points of view, potentially helping to heal growing polarisation. This could take the form of a PSB button, for example, on social media platforms and search engines, which would give access to content published by all four PSBs.</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>The CCOD believes that the recommendations set out in this consultation are a positive step forward, but more will need to be done to entrench media literacy best practice within the design of regulated services.</p> <p>In an ideal context, the information environment would organically move away from rewarding disinformation content as false AI generated material increasingly ‘pollutes’ the environment for users. However, realistically, current trends show that there is still active demand for disinformation and ‘trolling’ behaviour online. Indeed, perverse incentives are boosting demand for extreme content and disinformation on social media platforms.</p>

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	<p>The EU's approach to encourage adoption of online regulation can prove to be an instructive case. Based on the Digital Services Act, the EU has mandated the integration of 'inoculation' and pre-bunking on regulated services, demanding companies proactively help users identify misinformation and then auditing services' compliance with those guidelines. Short of an entire overhaul of the regulatory system, we believe our evidence on media literacy interventions (see response to Q3) and on news prominence filters (see response to Q4) can provide an effective way of addressing some of the concerns around adoption in the short term.</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>

Please tell us how you came across about this consultation.

- Email from Ofcom
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- 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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