

Consultation response form

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How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services

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Organisation

FUNDamentally Children

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](#).

Nothing

None

N/A

Your response

Question

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.

Your response

Broadly, yes. The recommendations clearly map onto the major actors in the digital media ecosystem: large platforms, online services, and broadcasters. However, from a child-development and digital-wellbeing perspective, the consultation misses a crucial category: **cross-sector industry collaborations and independent standards**

bodies.

Many harms and wellbeing risks children experience are **not platform-specific**; they emerge from system-level design patterns across games, apps, streaming, and social platforms—particularly those using algorithmic recommendation, generative AI, or user-generated play spaces. This is reflected in the RITEC global research with 787 children, which shows that wellbeing outcomes depend on *design choices*, not just platform governance .

The Children’s Digital Wellbeing Framework (CDWF) is being developed precisely to fill this cross-sector gap. It will provide **developmentally grounded standards** relevant to all digital services used by children, including games, apps, platforms, and immersive environments.

Suggested refinement: Ofcom should explicitly acknowledge *framework-setting organisations and accreditation schemes* as implementation partners and target audiences for the recommendations.

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.

Yes—but proportionality is essential. Smaller developers frequently create the digital products children use most (e.g., Roblox micro-developers, mobile game studios, EdTech start-ups). They often **lack in-house child development expertise** required to interpret broad media literacy principles.

The CDWF is being designed to translate high-level principles into **clear, practical, evidence-based standards** that smaller organisations can implement without specialist expertise or large compliance budgets. This mirrors the Good Toy Guide’s proven model of supporting SMEs in the physical play sector, adapted for digital contexts .

Therefore, while the recommendations should apply universally, **Ofcom should explicitly support scalable, independent frameworks** that help smaller organisations comply.

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.

Overall, the 10 recommendations are necessary and directionally strong. However, three systemic limitations reduce their likely effectiveness without complementary support:

1. The recommendations focus heavily on *information literacy* rather than *developmentally-informed design*.

Children’s experiences, and associated risks, are shaped far more by **game mechanics, social interaction features, reward loops, onboarding, narrative, and sensory design** than by the content classification systems currently in use. RITEC evidence shows that *design features directly influence children's autonomy, competence, emotional regulation, relationships, and safety* .

A literacy-only model risks being reactive and insufficient for pre-teens who cannot meaningfully self-regulate complex digital environments.

2. A risk of fragmentation without a unifying, cross-sector standard.

Platforms are likely to interpret the recommendations differently. Games companies, streaming services, EdTech providers and AI-enabled platforms currently operate under inconsistent approaches to wellbeing and online safety.

The CDWF will address this by establishing **harmonised, cross-vertical standards** applicable to all children’s digital products.

3. No mechanism for quality assurance.

Several recommendations require services to “consider”, “review” or “support” certain literacy outcomes. Without an **independent accreditation mechanism**, quality will vary widely.

The CDWF aims to provide:

- measurable standards,
- independent evaluation and testing with children,
- and a trust seal to guide parents and educators.

This reduces the risk of *symbolic compliance*—services claiming alignment without meaningful design changes.

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

Recommendation A: Endorse or recognise independent, evidence-based industry frameworks.

The CDWF and its accreditation model are being designed to operationalise exactly the kinds of principles Ofcom outlines. Recognising such frameworks would:

- lower compliance barriers for smaller organisations,
- accelerate sector adoption,
- provide Ofcom with a scalable implementation route.

Recommendation B: Embed child development science in media literacy expectations.

For example:

- safe emotional challenge without overwhelm,
- opportunities for autonomy and competence,
- support for identity exploration and regulation,
- relational and community safety in multiplayer spaces.

These dimensions are evidenced extensively in the RITEC research .

Recommendation C: Encourage transparent auditing of design features.

Design transparency—recommended across international policy work—should be extended to include:

- algorithmic curation,
- reward systems,
- social matchmaking,

- frictionless spending behaviours,
- and rapid interaction loops.

The CDWF aims to include methods for evaluating these features through expert review and real-world child testing.

Recommendation D: Require or encourage wellbeing-focused impact assessment for new child-facing digital products.

This would parallel data protection impact assessments and could become an industry standard.

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

1. Provide recognition for organisations adopting accredited frameworks.

Many services are motivated by trust, differentiation and reputational advantage. Recognising CDWF-aligned organisations would accelerate uptake.

2. Incentivise safer design through procurement and partnerships.

Government and public bodies could prioritise CDWF-accredited tools in:

- schools,
- youth services,
- health and wellbeing programmes.

3. Support voluntary codes with practical tools.

The CDWF will offer:

- implementation guidance,
- developer toolkits,
- testing protocols,
- and child-inclusive research methodologies.

These give organisations a **clear route to compliance** without needing internal child psychology teams.

4. Build a coalition of industry, academic and regulatory partners.

Cross-sector convening,(something the CDWF is already facilitating) creates peer pressure, shared norms, and a culture of continuous improvement.

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.

The assessments are thorough, but there are opportunities to strengthen alignment with child rights and developmental science:

1. Equality Impact Assessment

Children with SEND, sensory sensitivities, or social communication differences experience digital spaces differently. RITEC findings show that specific design features can *support or hinder participation* depending on a child's neurocognitive profile (e.g., sensory overload vs calming sensory loops) .

Integrating these insights would strengthen the EIA and align with Article 23 of the UNCRC.

2. Rights Assessment

The assessments would benefit from including rights related to **positive development**, not solely safety:

- the right to play,
- the right to participate,
- the right to accessible environments supporting emotional and cognitive development.

The CDWF explicitly incorporates these developmental rights.

3. Impact Assessment: Implementation feasibility

The current assessment underestimates the **practical complexity** many organisations face. The CDWF will provide an implementation route

that Ofcom can reference to improve feasibility and reduce compliance burden.

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