

Ofcom's Consultation - How to promote Media Literacy

Overview

Good Things Foundation is the UK's leading digital inclusion charity. We run the National Digital Inclusion Network (comprising over 8,000 diverse hyperlocal organisations from libraries, GP surgeries to commercial highstreet stores) providing free digital inclusion support to the communities and customers they serve. This includes:

- the National Databank, providing free mobile connectivity data;
- the National Device Bank, supplying free, refurbished devices to people in need;
- Learn My Way and the AI Gateway, our free and interactive basic digital skills and AI literacy platforms, which are supporting thousands of adults online.

Good Things Foundation is also part of the Minimum Digital Living Standard (MDLS) project, which is working to establish a nationally agreed benchmark for what 'good' looks like for households living in the digital age.

Given our expertise, we welcome the opportunity to support commitments to media literacy - encouraging platforms and services to bake in digital inclusion and deliver on Ofcom's recommendations.

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Questions

Is it clear which types of organisations the 10 proposed recommendations are aimed at? Please provide reasons and evidence to support your answer

Good Things Foundation believes it is clear which types of organisation the 10 proposed recommendations are aimed at. It is important that the recommendations cover a wide-range of entities. In particular, we recognise the significance of the inclusion of generative and agentic AI services.

- Our recent polling shows that a third (38%) of UK adults feel less confident going online since the rise of AI tools such as ChatGPT and Gemini (Public First, 2025).
- For those with limited or no broadband connection, 49% said the rise of AI has made them less confident to go online. This is higher than the UK average of 37%; meaning **those experiencing some form of digital exclusion are at a greater disadvantage** (Public First, 2025).¹

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

¹ The population represented is UK adults and sample size for the online survey was 2011. All results are weighted using Iterative Proportional Fitting, or 'Raking'. The results are weighted by interlocking age and gender, region and social grade to Nationally Representative Proportions.

Good Things Foundation believes that all organisations that provide online platforms and services play a role in media literacy. This includes start/scale ups as well as financial and essential government services.

Specifically if **start/scale ups embed Ofcom's media literacy principles from the beginning** - ultimately baking in digital inclusion - this will negate the need for retrofitting and adapting their online services in the future.

On financial and government services, **we recognise how banks, the NHS, and other state service providers are trusted institutions that play a key part in digital inclusion**; they deliver platforms and services that can help bolster their customers' online safety, media literacy, and digital confidence due to their trustworthiness (Whelan, 2025).

These institutions provide products and services that can help improve people's everyday lives; when asked how they hope mobile technology will improve their daily life as part of Lloyds' Consumer Digital Index, 39% of those surveyed stated making their everyday tasks faster and more convenient; 39% stated making it easier to manage money (2025).

Online banking, accessing the NHS app, and claiming universal credit are some of the key tasks people perform online - applying Ofcom's principles to these trusted, essential service providers would further media literacy for many users and audiences. For example:

- The NHS 10 Year Health Plan for England states the NHS App will become the 'full front door' to the NHS by 2028, yet there are only 33 million registrations on the NHS App so far (NHS England, 2025);
- Some banks tell us anecdotally that 1 in 8 of their customers don't use their online banking services.

Whilst we acknowledge some of these organisations may not be in scope, we believe that setting higher expectations for larger organisations, actively monitoring and ultimately enforcing them to deliver on the principles will result in improved media literacy for all.

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

- *Recommendation 1: Embed media literacy by design, making inclusive design choices a foundational principle in service architecture and policy*

Effectiveness: Good Things Foundation's research shows that people who experience digital exclusion are less likely to have digital, media, or AI literacy, and face disadvantages in developing these (2024). We recognised how **media literacy by design is an effective way to enhance users' and audiences' media literacy and their wider digital and AI skills, confidence, and overall digital inclusion.**

The publicly-defined '**Minimum Digital Living Standard**' (MDLS) points to **critical knowledge and skills as a pivotal aspect of the digital safety and well-being of households and enables them to digitally participate** (2025). The MDLS categorises critical

knowledge and skills in four areas: managing security; evaluating information seen online; evaluating what to share online; and thinking about digital wellbeing (MDLS, 2025). Platforms and services embedding media literacy by design as a foundational principle can foster the development of these skills, know-how, and users' informed choice.

Applicability: Service designers, policymakers, and others have a role in making inclusive design choices a foundational principle - our services show this is significant to people's digital inclusion and participation. Good Things Foundation's Learn My Way supports people to gain the digital and media literacy basics (2025). Learn My Way delivers accessible content - written in plain English, with visual cues to guide the user - and we avoid using pop-ups and prompts to ensure users have more control over their experiences and the choices they are making (Good Things Foundation, 2025).

Part of **our policy and practice is ensuring we work with experts by experience** (members of our National Digital Inclusion Network and those with lived experience of digital exclusion) to inform our service and platform design - addressing barriers such as usability and language upfront and altogether making platforms and services easier to use.

Risks: While we acknowledge the importance of age-appropriate design for children, **using simplified language and clear explanations of features should go beyond younger users and audiences**. There is a risk that key populations most affected by digital exclusion - groups who have been historically underserved - are more likely to suffer online harms or remain offline (UK Government, 2025a). If not considered and collaborated with in the design process, there is risk that these groups will remain offline or may choose to not continue to digitally participate (many of which are adults and caregivers guiding children and younger people).

There is also a risk that the **design process is not consistent nor uniform**. Ofcom has a significant role in enforcing a co-designed, standardised design that ensures users and audiences can navigate online services and platforms safely, effectively, with ease and informed choice.

- *Recommendation 2: Offer clear, meaningful choices and transparent information at key points in the service experience*

Effectiveness: Platforms and services have a duty to offer clear, meaningful choices and transparent information at key points in the journey - with services and platforms prioritising people's choices and control over commercial or other organisational interests.

Clear information across a user journey can better help users and audiences understand their choices, support informed decision-making, and develop their critical skills and knowledge. Evaluating information seen online, evaluating what to share online, and thinking about digital wellbeing are some of critical skills and knowledge needed to reach the Minimum Digital Living Standard (2025).

Additionally Good Things Foundation's beliefs and trust barriers research evidenced that **helping people make informed choices and knowing the impact of these choices was**

key to building digital trust - and therefore using platforms and services (Good Things Foundation with VCSE Health and Wellbeing Alliance, 2025).

Applicability: We provide meaningful choices and transparent information in our platforms and services, for example Learn My Way which supports adults to gain the digital and media literacy basics (see Recommendation 1 'Applicability').

Learn My Way's Terms and Conditions, Privacy statement, and cookies control options and information is written in straightforward language (Good Things Foundation, 2025). We deliver other content, including our corporate website, with the same level of transparency for the default settings and systems (Good Things Foundation, 2025a; See also recommendation 1 'Applicability').

Risks: To mitigate the risk of challenging user journeys and inaccessible content, providers need to consider the population groups that typically experience digital exclusion and co-design platforms and services with them (see Recommendation 1 'Risks').

- *Recommendation 3: Equip people with practical tools to manage and personalise their online experience*

Effectiveness: Good Things agree that media literacy by design needs to account for safe, informed choices made by both children and adults to manage their digital experiences. This includes default content control settings being simple, accessible, and time management and other tools be made more visible so people can effectively manage their screen time - with prompts, guidance, and enabling safety and security by default becoming the norm.

Applicability: Our aforementioned learning platform Learn My Way contains a readable, easily-findable Privacy statement for users to access (Good Things Foundation, 2025 - see Recommendation 1 and Recommendation 2 'Applicability').

Risks: Ofcom has a significant role in enforcing a co-designed, standardised process and design that ensures users and audiences can navigate online services and platforms safely, effectively, with ease, and informed choice; with setting controls, language and terminology consistent across platforms and services for all users and audiences to navigate them (see Recommendation 1 'Risks').

- *Recommendation 4: Empower people with the knowledge, skills and confidence to understand, interpret and critically assess the credibility of the content they encounter*

Effectiveness: Good Things Foundation agrees that platforms and services need to empower users and audiences to understand, interpret, and critically assess the credibility of online content - especially in the AI age.

AI literacy, as well as digital and media literacies, are inextricably linked and increasingly fundamental for users and audiences - helping them assess content and keep connected,

confident, and safe (Good Things Foundation 2024 - see response to Question 1). Yet nearly 8 million adults still lack foundational digital skills (Good Things Foundation, 2025b).

We acknowledge that tools and visual markers can support informed interpretation and build trust - and our AI research shows that supporting people in this regard, as well as courses, learning, and through positive media stories about the opportunities these emerging technologies can bring are also valuable (Good Things Foundation, 2024).

Applicability: Good Things agrees that it is vital that **service providers support people in developing the critical thinking skills needed to navigate today's complex digital landscape - and that it will likely be a combination of design, tools, placement and investment in skills development that will make this a reality.** Our work on the Minimum Digital Living Standard points to the value of critical knowledge and skills, to enable digital safety and well-being of households (MDLS, 2025 - see Recommendation 1 'Effectiveness').

We are empowering people with knowledge, skills, and confidence through our Ofcom-supported digital media literacy topics around data privacy, digital wellbeing, and critical thinking skills on Learn My Way. These are areas which will help people understand, question, navigate, and manage their online experiences; essential to benefitting from being online, while being aware of, and avoiding risks and harms. From May to September 2025, the topics have supported 2,580 unique learners to gain skills in the aforementioned areas (Good Things Foundation, 2025c).

Risks: **Artificial Intelligence and emerging technologies are a risk factor,** as current awareness and understanding of AI is low (Good Things Foundation, 2024). Our recent polling shows that a third (38%) of UK adults feel less confident going online since the rise of AI tools such as ChatGPT and Gemini, and nearly 70% of the British public said AI makes it harder to know what is real (Public First, 2025).

To ensure knowledge, skills, and confidence is built for the people who are most at risk, **platforms and service providers need to consider the population groups that typically experience digital exclusion and co-design with them** (see Recommendation 1 'Risks', Recommendation 2 'Risks' etc.).

- *Recommendation 5: Empower and support parents and caregivers to guide and support younger users in age-appropriate and meaningful ways*

Effectiveness: Good Things Foundation agrees that **awareness alone is not enough - parents and caregivers need the critical knowledge and skills to help reduce children's challenges with their digital experiences,** including screen time and their other online behaviours, as well as their own.

Beyond factors such as design, usability and confidence to keep children safe online, our work on the MDLS - specifically households with children - highlighted the role of parents' (and caregivers) knowledge and skills, enabling them and their children to digitally participate as parents (and caregivers) know how to operate parental controls and device location sharing, show they choose to use them (MDLS, 2025).

Applicability: We point to the example of Parent Zone’s Everyday Digital programme for successful applicability. Created with funding from the UK Department for Science, Innovation and Technology (DSIT), the programme provides self guided information for parents and ideas to try at home with their kids, making media literacy engaging and enjoyable for all (See: Parent Zone, 2025).

Additionally, Parent Zone’s Talk:Tech programme - similarly DSIT funded - supports young people with speech, language and communication needs (SLCN) to have conversations about the online world through a range of free downloadable visual and spoken resources.

The programmes are underpinned by research, and practice and developed in collaboration with young people, parents, teachers, and specialists (Parent Zone, 2025).

Risks: **Platforms and service providers need to consider the parents and caregivers who may experience digital exclusion and co-design with them** to ensure they are also able to guide and support younger users online (see Recommendation 1 ‘Risks’, Recommendation 2 ‘Risks’ etc.).

- *Recommendation 6: Empower, engage and enable expert third parties to provide enhanced support, helping to extend the reach and impact of media literacy efforts*

Effectiveness: **Online platforms and services need to explore ways to share timely links to expert third party courses and authoritative content during meaningful moments,** such as our flexibly-delivered learning platforms Learn My Way and the AI Gateway:

- Learn My Way is currently hosting Ofcom-supported media literacy topics, which from May to September 2025 has supported 2,580 unique learners to gain skills in areas such as improving their digital wellbeing, learning how websites manage user behaviour, and understanding online tracking (Good Things Foundation, 2025c). There were 387 hubs from the National Digital Inclusion Network supporting media literacy learners across the country - and our evidence shows that the average age of those completing the modules was 52 years old, with 24% under 45, and 24% 65+ (Good Things Foundation, 2025c).
- Since the AI Gateway launched earlier in 2025, we have seen high levels of engagement and a notable interest in animations relating to topical themes around Artificial Intelligence - such as ‘AI: Myths vs. Reality’ and ‘The Hidden Costs of AI’ - and our quiz format content is popular, including ‘Spot the AI image’ and ‘What is AI? Quiz’. Of our practice activities, letter writing is the most frequented on the AI Gateway (Good Things Foundation, 2025a).

We recognise the importance of in-person, non-judgmental, practical support - **‘trusted faces in local places’** - as delivered by the 8,000 organisations in the National Digital Inclusion Network (including libraries, community centres, self-advocacy groups, Virgin Money stores, housing associations, etc.). Evidence from evaluations involving Network hubs points to **the value of personalised support, related to people’s interests and circumstances, delivered by trained staff and volunteers who already have relationships with people who often face multiple barriers in their lives** (see: Future Digital Inclusion Programme

2014-19; HMCTS Digital Support Implementation Review 2017-2020; Digital Lifeline Fund 2022).

Third parties are often uniquely positioned to extend the reach of media literacy efforts to those who need it most, and can deliver resources flexibly; responding to their users' and learners' needs and contexts.

Applicability: A good example of expert third party delivery - with on-the-ground knowledge of user needs and community vulnerabilities - is the UK Department of Science, Innovation and Technology's recent Digital Inclusion Innovation Fund support for Good Things Foundation, WSA Community and Libraries Connected (project lead). The 'Innovating in Trusted Spaces' consortium is to **work with UK libraries to co-create a new practice framework of new models of delivery for effective, efficient, and relevant digital inclusion support which includes media and AI literacy upskilling for both the public and library staff.**

Risks: The greatest challenge when working with third parties is insufficient, unsustainable funding to deliver on media literacy efforts. Through the National Digital Inclusion Network, we have witnessed firsthand the difficulty of accessing resources for strong and resilient organisations, as many hubs including Renaisi and City Gateway have had to shut their doors due to the funding landscape.

Community organisations such as these often rely on funding led through a mixture of local government, ICSs, grants and foundations, as well as individual donors - resulting in inconsistent delivery and development. To ensure that expert third party sources - such as those provided by community organisations typically reaching underserved populations, in flexible ways - and authoritative content is available at timely, meaningful moments across a user or audience members' online experience, then **longstanding, substantive funding that supports consistent delivery and evaluation must be made available.**

- *Recommendation 7: Help people understand, interpret, and access the credibility of information by creating and/or promoting relevant programming or educational content*

Effectiveness: Good Things Foundation agrees that broadcasters and streaming servicers should create and/or promote programming or education content that helps people to understand, interpret, and access the credibility of information on online platforms, digital environments, and beyond. **As key trusted relationships, public service broadcasters have an especially significant role in supporting and promoting media literacy,** as well as digital and AI literacy and overall digital confidence and inclusion - for both adults and children.

Overall digital confidence - of which media literacy plays a role - has been suggested to improve with **news stories and other educational programming that informs the audience about scams, fraud, and mis/disinformation as it can guide viewers on how to avoid harmful online behaviour which can help build confidence and trust** (Whelan, 2025). Good Things' AI research (2024) shows that both positive and negative news stories about

Artificial Intelligence and related technologies are fundamental to ensure that the uses, benefits, as well as privacy and security risks are known.

Relatedly our research on beliefs and trust points to a need for **better communication about the digital shift**; for example, how digital services are designed to improve access to care, rather than just be cost-saving (Good Things Foundation with VCSE Health and Wellbeing Alliance, 2025).

Broadcasters and streaming services have an important role to play in promoting programming or education content that narrates these conveniences, all the while improving users and audiences' digital media literacy.

Applicability: The BBC are working to create and promote relevant programmes and education content to help improve audiences' digital media literacy. For example, the BBC's Strictly Come Dancing has shifted its voting options online as BT retired telephone voting options and in the shorter term, **the broadcaster is encouraging audiences to visit hubs in the National Digital Inclusion Network and utilise tools such as Learn My Way if they would like digital support** (BBC One, 2025).

Additionally the BBC's Scam Interceptors programme has an adjacent Scam Safe Week campaign which dedicates a whole week of special content to ensure the BBC are a trusted place for advice, guidance, and insight on how to spot and stop scams (BBC, 2025). **The BBC worked with Good Things Foundation during that week to promote Learn My Way and other digital inclusion and media literacy services, such as our AI Gateway.**

Risks: As before, **a challenge to providing relevant educational programming and content is funding - especially for UK public services broadcasters in the accelerated age of AI.** Additionally, broadcasters and streaming services working with third parties can also resort to insufficient, unsustainable funding for charitable organisations - in spite of their unique expertise - to deliver on media literacy efforts.

- *Recommendation 8: Promote media literacy beyond services, investing in campaigns, content, and partnerships that promote media literacy skills*

Effectiveness: Good Things Foundation's research shows that people who experience digital exclusion are less likely to have digital, media, or AI literacy, and face disadvantages in developing these (2024). **Through the work of our National Digital Inclusion Network and the platforms Learn My Way, the AI Gateway, as well as campaigns such as Get Online Week, we know firsthand how effective media literacy promotion can be.**

This is epitomised in our yearly Get Online Week, the largest digital inclusion campaign of its kind. This year we supported over 1,000 local events across the country to help people 'try one thing' and get online - with The Times and Sunday Telegraph both running exclusives on digital exclusion. We also launched polling during the campaign that promoted our AI Gateway platform, to promote AI literacy (see: Public First, 2025).

Applicability: We are currently working with WSA Community and Libraries Connected (project lead) to work with UK libraries to co-create a new practice framework of new models of delivery for effective, efficient, and relevant digital inclusion support which includes media and AI literacy through our learning platforms for both the public and library staff (see Recommendation 6 'Applicability'). Whilst we acknowledge the nascent stages of the project, we acknowledge we are understanding how the available resources designed to build media and AI literacy can be meaningfully used - as is the case with any new campaign, content, or programme - and **welcome the Department of Science, Innovation and Technology's investment into the initiative.**

Risks: As before, **populations groups that typically experience digital exclusion need to be centred so campaigns and content reach those most in need** (see Recommendation 1 'Risks', Recommendation 2 'Risks' etc.).

There is also a risk that the investment into campaigns, content, and partnerships that promote media literacy **are not uniformly monitored, evaluated, and learnt from** and that success stories are not shared - including those working with people with lower digital confidence.

- *Recommendation 9: Support the media literacy of underserved, diverse audiences*

Effectiveness: Good Things Foundation believe that underserved, diverse users and audiences need to be foregrounded, including:

- low-income households;
- older individuals;
- disabled people;
- people experiencing unemployment and seeking work;
- young people (including those not in education, employment or training);
- people with low levels of English literacy;
- refugees and asylum seekers;
- homeless individuals and those facing insecure housing conditions;
- individuals who have been displaced due to domestic violence, human trafficking, or modern slavery;
- people living in a rural area (UK Government, 2025; UK Government, 2025a).

Many individuals that make up these groups are adults guiding younger people, making them even more significant to overall media literacy capability.

Furthermore, our operating model - working with the National Digital Inclusion Network - results in 75% of our delivery taking place in areas of the highest need (IMD 1-3), and two thirds of the people we support are from ethnic minority communities. Therefore, we know about the needs of these groups and our approach maintains its community-based delivery as we know it is effective at reaching those most vulnerable.

We encourage inclusive design practices to be adopted to address these groups' needs, and for platforms and services to form partnerships with organisations such as our's to co-design and deliver impactful media literacy interventions.

Applicability: As before, our Ofcom-supported media literacy modules on Learn My Way supported 2,580 unique learners to gain skills in improving their digital wellbeing, learning how websites manage user behaviour, understanding online tracking, and other media literacy topics from May to September 2025 (Good Things Foundation, 2025c - see Recommendation 4 'Applicability' and Recommendation 6 'Effectiveness').

There were 387 hubs from the National Digital Inclusion Network supporting media literacy learners across the country - libraries delivering nearly a third (35%) followed by charities and educational establishments, and our evidence shows that the average age of those completing the modules was 52 years old, with 24% under 45, and 24% 65+ (Good Things Foundation, 2025c).

67% of those who completed the survey in regards to the topics were white, 5% Asian, 24% Black, and 5% other ethnicities (Good Things Foundation, 2025c).

Of the people who completed our survey, 71% felt more able and/or safe online as a result of their learning and 81% felt happier, healthier, and/or better off (Good Things Foundation, 2025c).

Risks: There is a risk that these harder-to-reach groups will continue to be underserved and furthermore, the organisations supporting them are facing funding challenges. As before, Good Things Foundation has witnessed firsthand the difficulty of accessing financial support for even the most strong and resilient organisations, as two hubs Renaisi and City Gateway have had to shut their doors due to the challenging funding landscape in the UK (see Recommendation 6 'Risks').

- *Recommendation 10: Conduct and publish evaluations of the impacts of their choices and activities*

Effectiveness: We agree that services designers evaluating the impact of their media literacy activities should be made regularly readily available for the wider public, and that an annual statement on media literacy should be published and publicised. **We also believe that consistent monitoring and evaluation should be deployed.**

Applicability: To explore and understand the extent of impact of media literacy and digital inclusion approaches it is imperative that consistent data is collected at both intervention and population level. The Indicators of Digital Inclusion (IDI) are a concise, evidence-based set of questions developed by Good Things Foundation and a group of expert organisations to help accurately measure the depth and breadth of digital exclusion (2025d).

Not one current dataset exists that shows the depth and breadth of digital exclusion in relation to multiple barriers and vulnerabilities people may face. **The IDI questions assess digital inclusion by first determining an individual's online status, then identifying their barriers related to access and skills, and finally by layering on their vulnerabilities associated with financial risk and reliance on support (2025d).** There is significant interest in the IDIs and several organisations have already incorporated them into their surveys - such

as residents surveys in Cornwall and Manchester, and their inclusion in the national 'Money View' survey conducted by Money and Pension Service (MaPS).

Risks: Evaluation needs to be consistent for organisations to more simply monitor their work, and for others to process the impact results. Without uniform monitoring, evaluation, and learning procedures, there risks an inconsistent approach which undermines the programmes under evaluation. The IDIs and Good Things Foundation's simple theory of change and evaluation questions provide a consistent framework. However it is only publication and celebration of these outputs (both positives and negatives) that will enable learning and best practice to be embedded across all services to improve over time.

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

Alongside Ofcom, Good Things Foundation have designed and delivered well-received resources to users and audiences including Learn My Way and the AI Gateway. Yet the greatest challenge when working with third parties - such as the hubs that deliver our free services (inc. community centres, libraries, etc.) - is insufficient, unsustainable funding.

We have witnessed firsthand the difficulty of funding and investment for strong and resilient organisations, and many hubs such as Renaisi and City Gateway have had to shut their doors due to the UK funding landscape.

Community organisations such as these often rely on funding led through a mixture of local government, ICSs, grants and foundations, as well as individual donors - resulting in inconsistent delivery and development. To ensure that users and audiences are equipped - such as those provided by community organisations in our Network, typically reaching underserved populations - and authoritative content is available at timely, meaningful moments across a user or audience members' online experience, then **substantive funding supporting consistent delivery and evaluation must be made available.**

Additionally in the age of AI, digital media literacy is changing fast. **There needs to be upskilling and support for those in relevant positions to help and guide the public.**

Do you have any examples of suggestions of ways of encouraging services to adopt these recommendations?

We believe that Ofcom has a role in enforcing - rather than encouraging - required standards for design features that aid digital media literacy in users and audiences. Currently, **the design process is not consistent nor uniform and we recognise the significant role Ofcom has in necessitating a co-designed, standardised design** that ensures users and audiences can navigate online services and platforms.

A standardised approach - with clear terminology and co-designed features - would aid understanding so users and audiences can make informed choices and effectively navigate the world of digital - with safety and ease.

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