Google response to Ofcom consultation on promoting media literacy

Executive summary

Google welcomes the opportunity to respond to Ofcom's consultation on promoting media literacy and we support Ofcom's continued focus on empowering users to have positive experiences online.

At Google, our company's mission is to make the world's information universally accessible and useful. An essential part of that is helping people understand what they're reading and watching online. We are constantly making new products and features to help people navigate the rapidly evolving information landscape. We achieve this by:

- **Elevating reliable sources:** People around the world turn to our services to find information, learn about topics of interest, and make important decisions. As technology evolves, we will continue to help everyone find the information they're looking for. To deliver on this mission, helping users find useful, relevant and high quality information across our services is of utmost importance. We are focused. We provide information and media literacy tools to empower users to access content.
- **Giving context:** We take seriously our responsibility to create a safer internet and provide our users access to relevant content, including through delivering the right context they need to make informed decisions about the information they see online,
- **Developing AI responsibly**: Google is an "AI-first" company and we have been working on AI for more than twenty years. We are applying AI in our ground-breaking products used by people everywhere, in our contributions to scientific advances that benefit people, and in helping to address societal challenges.
- **Fostering civil society collaboration:** We partner with experts and organizations across Europe to support civil society programmes and initiatives directly advancing media literacy and online safety, including Be Internet Legends and Super Searchers in the UK.

The information landscape is continuously evolving, and our efforts to advance media literacy adapts to ensure suitability. We evaluate the effectiveness of our approach on an ongoing basis including through third-party research. Our product features undergo regular user research and refinement based on research insights. We communicate widely and publicly about our ongoing product efforts and publish regular transparency reports covering content moderation, government requests and platform integrity.

We support proportionate, risk-based implementation of Ofcom's media literacy duties and are pleased to see this reflected in the consultation, building on the approach of the Online Safety Act. We especially welcome alignment between some of Ofcom's recommendations and our existing approaches, such as partnering with expert organisations - Internet Matters, Parent Zone, and CILIP in the UK - to deliver more resilient outcomes for users and society more broadly.

As such, as Ofcom develops its approach, it will be important to take stock of the impact of existing investments, partnerships and programmes, to inform appropriate actions and recommendations.

We take our responsibility to our users seriously working with experts on product developments and features and also supporting wider education efforts in collaboration with third parties. In the UK, since we launched the programme in 2015, we have helped train over 10 million primary school children in online digital literacy, through our Be Internet Legends programme delivered in close partnership with Parent Zone.

Alignment with international approaches can help support consistency and avoid unintended consequences for users. Platforms increasingly face the challenge of adopting a lowest common denominator approach to platform and product design, or creating jurisdiction-specific experiences - increasing costs and complexity whilst potentially confusing users and hurting the user experience. In addition, new requirements or changes in existing legislative approaches can risk creating "warning fatigue" where users ignore or bypass interventions or migrate to less responsible platforms. Innovation can be protected by avoiding prescriptive "one-size-fits-all" mandates, and developing systems and processes that are proportionate to risk of harm, in line with the existing approach of the Online Safety Act.

Finally, we recommend that the scope of services is refined to better account for different service models and technologies (for instance, search engines are indexes of the web and messaging services involve private communication). Different services require different approaches and it remains important to accommodate this nuance as part of Ofcom's media literacy duties.

We welcome Ofcom's ongoing collaborative approach to working with platforms on media literacy. Our response outlines our commitment to media literacy across our products and through programmes and shares our positions on Ofcom's recommendations.

Our commitment to media literacy

Products

At Google, we view media literacy as a comprehensive set of technical, cognitive, social, civic and creative skills that enable individuals to access, use and critically evaluate information and media effectively. We consider media literacy throughout the design and development of all of our products.

Google sponsored independent research by Ecorys examining the media literacy landscape across Europe found that media literacy functions best as an umbrella concept that integrates several interconnected literacies. Digital literacy forms the foundation, equipping individuals with the practical skills to navigate digital tools, platforms and technologies, while information literacy builds upon this by developing critical thinking capabilities to locate, evaluate and synthesise information from various sources, distinguishing fact from opinion and recognising bias and misinformation. Increasingly, AI literacy is enabling individuals to understand how AI systems shape content curation and generation, while helping them to recognise algorithmically driven recommendations. These interconnected literacies empower people not only to navigate complex media environments but to participate actively and responsibly as informed citizens in democratic society, making thoughtful, informed choices about the content they consume, share and create across all platforms.

Understanding context

To help people better understand the content they encounter, we provide context to users at the time when it matters most: when they are in the process of searching for or consuming content.

On **YouTube**, we provide context to users in the form of information panels that show basic background information, sourced from independent, third-party partners, to give more context on specific topics. The panels link to resources providing additional information if the user chooses to further explore the topic. These information panels appear regardless of what opinions or perspectives on the topic are expressed in the video.

On **Search**, we have developed policies and features that help our users make sense of all the information they're seeing online.

- Our Search product policies for features like Knowledge Panels or Featured Snippets, prohibit audio, video, or image content that has been manipulated to deceive, defraud, or mislead.
- Knowledge Panels and Featured Snippets help users get a quick overview about the subject of their queries.
- We also build tools for users to better understand the sources shown on Search. Our "*About this result*" tool provides important context about Search results to help users understand source reliability and trustworthiness. Users may recognize a lot of websites in search results, but there might be others they don't. So this feature gives context about a website before users click through. With more information about a website, users can make a more informed decision about visiting it.
- We design our ranking systems to surface high quality information at the top of Search, and also build tools like *Search with an image* to help give people context so they can evaluate information and assess what content they can trust. And tools like *About this image* which provides users with background information on an image, to get a better understanding of whether an image is reliable, or if they need to take a second look.
- In addition to these features, AI Mode offers a powerful new approach for users to evaluate the content they see. AI Mode uses Gemini advanced reasoning, thinking and multimodal capabilities to help users ask harder questions and follow up more easily to dig deeper into a topic. Responses are grounded in Search results to reduce errors and provide easy-to-access supporting links to support further queries. The use of AI Mode to understand context has been supported by external experts, and has been recently incorporated into Super Searchers — Google's train-the-trainer information literacy programme (more below).

User agency

User customisation and agency is at the heart of our products. Tools embedded in Search like My Activity, SafeSearch and Family Link are designed to empower users to understand and manage the content they have access to, including added parental controls to manage children's digital experiences. We have developed a suite of comprehensive online safety information resources in the Google Safety Centre, which includes specialised guidance for different user groups: children, parents, educators, older adults - further empowering users with the information they need to use our products.

On **Google Ads**, '*My Ad Centre*' and "*Why this ad*" tools enable users to understand why they're presented with a specific ad and how to change their preferences so as to alter the personalization of the ads they are shown, or to opt out of personalized ads altogether. Our global Ads Transparency Centre also provides users with more information about the ads running across our platforms.

Generative AI

For **generative AI products**, we have deeply invested in developing and implementing state-of-the-art capabilities to help our users identify AI-generated content.

Ideally, we would possess a perfect, real-time method to provide users with complete information about the origins of all content they see online. However, that technology does not exist, and it is unlikely that it ever will. This is why at Google we invest in multiple efforts to help people, both on and beyond our services, understand the context surrounding online content and make informed decisions.

Provenance technology is a vital part of this effort. It can help explain whether a photo was taken with a camera, edited by software, or produced by generative AI. This kind of information is crucial for users to make more informed decisions about the content they engage with and helps build media literacy and trust. However, providing precise provenance information to answer the question,

"Is this AI-generated?" does not provide the full picture. It often lacks the fundamental context required to determine whether a given piece of digital content is truly trustworthy or not.

We have deeply invested in developing and implementing state-of-the-art capabilities to help our users identify AI-generated content:

- **Google's** SynthID **state-of-the-art toolkit** watermarks and identifies AI-generated content. SynthID embeds digital watermarks directly into AI-generated images, audio, text or video. The toolkit is now being integrated into a growing range of Google products, helping empower people and organizations to responsibly work with AI-generated content. Since its launch in 2023, over 20 billion pieces of content have already been watermarked with SynthID . In November 2025, we announced that users can now verify if an image was generated with or edited by Google AI right in the Gemini app. If a user sees an image and wants to confirm it has been made by Google AI, they can upload it to the Gemini app and prompt with a question such as: "Was this created by Google AI?" or "Is this AI generated?" Gemini will check for the SynthID watermark and use its own reasoning to return a response that gives users more context about the content they encounter online. Soon, we'll expand SynthID verification to support additional formats beyond images, such as video and audio.
- While SynthID is effective for watermarking and identifying content generated through AI, it is just as important to provide strong signals about non-synthetic content, such as photos and videos that come from cameras. That's why in February 2024, Google became a steering member of the Coalition for Content Provenance and Authenticity (C2PA)**, a** cross-industry effort to help provide more transparency and context for people when it comes to AI-generated content. C2PA has the benefit of being tamper evident and highly interoperable, making it an excellent vehicle for cross-ecosystem technical collaborations to signal the provenance of content at scale. We have also recently joined the International Press Telecommunications Council (IPTC) as a Voting Member.
- But because simply asking "Is this generated by AI?" does not suffice in assessing content trustworthiness, we work closely with leading information literacy experts around the world to understand the latest research and help ensure that our products are empowering users with information and tools to cross-check what they find online.
- One such innovation we are exploring in this space is Backstory, an experimental AI tool from Google DeepMind that surfaces information and helps people learn more about the context and provenance of images seen online. When given an image and a written prompt, Backstory investigates whether an image was AI-generated, when and where it's previously been used online, and whether it's been digitally altered. Built using Gemini, Backstory draws on a number of technologies designed to identify whether an image was created using generative AI. Backstory then combines this with a more holistic assessment of the context of the image. It surfaces how the image has been used on the internet over time and other information like metadata to help answer the user's written prompt.

As a relatively new area of research and product development, the range of technical solutions themselves are also rapidly evolving. Given the speed of technological change, something that works today may not be sufficient next year. That said, we caution against giving the impression that any regulatory or technical solution is a silver bullet and that technological solutions alone are sufficient. Artificial intelligence innovation raises complex questions that neither Google, nor any other single company, can answer alone. Getting it right will require continued collaboration among companies, academic researchers, civil society, governments, and other stakeholders.

Programmes and partnerships

We recognise that platforms cannot solve media literacy challenges alone, and we deeply value our partnerships: from grassroots teaching organisations to cross-industry collaborations, each works to enhance digital and media literacy skills, and information quality.

Key programmes and initiatives are summarised below and align with the pillars embedded in the Council of Europe's Digital Citizenship Education planner.

Be internet Legends

Educational programmes in schools are central to fostering media literacy. Our Be Internet Legends programme, developed in partnership with Parent Zone, supports media and digital literacy in primary school-aged children from ages 7-11 years, empowering younger children to use the web safely and wisely, including modules to address challenges faced by children with special educational needs and disabilities. The Be Internet Legends curriculum centers around The Internet Legends Code, a set of five core pillars designed to equip children with the knowledge and skills for safe, confident, and positive online behaviour: Be Internet Sharp focuses on smart sharing habits; Be Internet Alert teaches critical thinking to distinguish between real and fake online situations; Be Internet Secure stresses the importance of personal privacy and security online; and Be Internet Kind highlights the amplified impact of online actions, encouraging positive interactions online; Be Internet Brace focuses on encouraging open dialogue and discussing concerns with trusted adults. We are proud that the programme has reached over 80% of UK primary schools since 2018, and in November we celebrated the milestone of having trained 10 million UK children.

Third-party evaluation by Ipsos MORI found that children completing the training are twice as likely to understand online safety concepts and three times more likely to spot scams.

Be Internet Citizens

Be Internet Citizens, also delivered with Parent Zone, is an educational initiative designed to address the challenges young teens may face online. It aims to equip 13-15 year olds with the media literacy skills needed for positive digital engagement and social cohesion. The curriculum is built around practical, actionable skills that directly combat the spread of disinformation. Specifically, it encourages students to "Hit Pause" and teaches three core strategies: "Check the facts" (identifying sources and evidence), "Search for the truth" (using "lateral reading" to verify information), and "Don't get emotional" (recognizing manipulation and clickbait). This focus on critical thinking and emotional intelligence ensures students can navigate digital platforms thoughtfully rather than reactively.

The programme is designed for high-quality, accessible implementation within schools. It provides a comprehensive set of resources, including a complete 11-lesson curriculum, a teaching guide, and a dedicated "Train the Teacher" module to empower non-specialist educators. The delivery is flexible, offering both an hour-long, presenter-led school session and structured materials for classroom use. By covering key societal issues like misogyny across its content, the programme maintains relevance and directly addresses challenging topics in a structured learning environment, making it a valuable tool for modern education.

Super Searchers

Following a pilot with Public Libraries 2030, our Super Searchers programme launched in the UK in July 2025 with the Chartered Institute of Library and Information Professionals (CILIP). The programme empowers

librarians to support young people with the tools they need to critically evaluate online information, understand AI-generated content, and improve information literacy, with modules on:

- Understanding search engines and algorithms;
- Using advanced search techniques;
- Evaluating the credibility and reliability of sources; and
- The ethical use of information and AI.

We are aiming to reach 100,000 UK library users by December 2025, and we are proud that it has already reached over 1 million individuals in North America, Europe, India, Japan and Australia.

Ofcom's recommendations

All of the above should hopefully show we are supportive of the aims and ambitions of Ofcom's recommendations. We are also conscious of unforeseen risks, and believe it is important that recommendations do not unintentionally:

- **Create excessive user friction:** Overly intrusive warnings or mandatory checks risk impeding access to information. We believe interventions should be contextual and proportionate to risk, and we should seek to avoid a situation whereby access to information is prevented.
- **Duplicate existing obligations:** The Online Safety Act already imposes extensive duties on illegal content, child protection, and risk assessment, and UK data protection law requires transparency about data processing. Considering the legal foundations of these recommendations, we would suggest that the recommendation should clearly articulate where they are filling gaps.
- **Harm innovation:** Prescriptive requirements may not translate across service models. Emerging technologies require experimentation. Premature standardisation could lock in suboptimal solutions.

Sustained improvement in media literacy requires ecosystem collaboration, which is why we are committed to working with Ofcom to promote and improve media literacy across the UK. We welcome Ofcom's focus on media literacy as a strategic priority, and we believe there is much in the aims and recommendations that aligns with Google's approach and values.

Media literacy-by-design (Recommendation 1).

This recommendation is well aligned with our approach to designing our products. Google Search was among the first services to publicly adopt Ofcom's "Best Practice Principles for Media Literacy by Design" in October 2024. In line with the approach of the Online Safety Act, it is important that Ofcom remains flexible and proportionate to avoid stifling innovation by requiring platforms to change existing systems and processes that are working to support media literacy.

User choice, control, and empowerment (Recommendations 2, 3 and 5).

We offer users clear, meaningful choices and options to customise their user experience at significant moments when using our products and services. When creating an account, all users go through a set-up flow that empowers them with privacy and personalisation options. We also offer ways for parents to manage their children's screen time through Family Link - our tool to support parents to make informed and safe choices about how to manage their children's online experience.

Empowering users to understand and critically assess content (Recommendation 4).

We agree that people need accessible tools to manage their online experiences. We have launched several campaigns to promote our user experience tools and promote wider dialogue about digital literacy. These include the "Find Your Balance" and "Hit Pause" campaigns - multi-year, multi-channel initiatives to actively support people in using and adopting our user choice tools. These initiatives contribute to Google's broader digital wellbeing efforts by driving awareness of available parental/safety tools and promoting critical media literacy skills for safer digital engagement. Furthermore, when in Search, features such as "About this Result", "Search with an Image" and "About this Image" help to support users' understanding of how Search works and how results are returned, increasing trust and confidence to understand and critically assess content.

When it comes to helping users tell the difference between AI-generated content and authentic content, our goal is to improve transparency and trust in AI, and so we collaborate closely with industry partners to achieve this through our membership of the C2PA. Our new tool, SynthID, is designed specifically for AI-generated content, and helps users to identify if and when content has been altered to foster informed interpretation and trust in generative AI. We have also developed the SynthID Detector, empowering users with the tools to identify Google AI-generated content, and have recently announced that users can now verify if an image was generated with or edited by Google AI right in the Gemini app.

Google supports transparency for AI-generated content and is proactively engaging with policymakers globally to help shape responsible, future-proof regulation. Our approach is to encourage the adoption of provenance techniques, like digital watermarking and metadata, that provide important context without stifling innovation or creating unintended negative consequences for users.

Investing in media literacy partnerships and skills (Recommendations 5, 6, 8, 9).

We believe that partnering with third sector organisations is crucial to adopting media literacy fully across the UK, and in particular with harder to reach users. We have invested significantly in a range of partnerships including with Parent Zone, CILIP, Samaritans, and others such as through the Google News Initiative, reflecting our belief that trusted organisations with deep community knowledge are essential for advancing media literacy.

We are also supportive of the idea of systematic integration of media literacy throughout the national curriculum to strengthen young people's capabilities in navigating today's media and information landscape. The recommendation that online services should promote media literacy beyond their own platforms through sustained funding of skills-building programmes aligns closely with our existing approach and reflects our understanding of current gaps in the UK media literacy ecosystem.

We also urge caution against a prescriptive approach that would require specific partnerships with specific organisations. Proposals should be flexible and proportionate, enabling evolution and ability to focus on the intended outcome for users.

Gaps in media literacy adoption

Media literacy efforts would benefit from a broadened conceptual framing, with a vision of media literacy as a tool for democratic empowerment, for access to information, and recognising that digital literacy is not merely about protection from harm, but about enabling active, informed participation in civic life.

The present UK landscape faces significant structural factors. Funding remains short-term, central coordination is insufficient and there are significant demographic gaps beyond school-age children.

Achieving media literacy at the national level requires more centralised Government coordination and universal long-term objectives. Current delivery relies heavily on the essential work undertaken by companies, charities and third-sector partners, meaning our collective impact is constrained by fragmented coverage and impact. A more sustainable model must begin with a Government-led education and literacy strategy designed to provide the necessary stability for effective programmes to mature and scale.

Strengthening evaluation and measurement

We recognize and share Ofcom's core objective to ensure that media literacy interventions are effective, evidence-based, and subject to robust evaluation. However, we caution that the challenge of achieving consistent, cross-platform measurement is significant. Developing a one-size-fits-all metric risks imposing impractical or overly complex burdens, leading to unreliable data and stifling innovation.

Strategic investment should leverage private and third-sector expertise and include built-in evaluation mechanisms to effectively measure long-term impact. Third-party evaluation of our Be Internet Legends programme by Ipsos MORI in 2024 yielded insights that directly informed subsequent iterations, including new modules on wellbeing, personal data usage, and age appropriate content.

To address the measurement gap constructively, we recommend focusing on establishing shared evaluation principles rather than prescriptive, uniform metrics. Many media literacy education programmes lack robust or consistent evaluation. Ofcom could facilitate a shared research agenda including randomised control trials, longitudinal studies, and cross-platform measurement approaches. Google is willing to continue contributing data and technical expertise to these efforts.

Several specific areas require coordinated action. The rise of AI-generated content presents both challenges and opportunities. Consistent approaches to labelling would help users develop reliable understanding of what is AI-created. We recommend that Ofcom convene an industry working group to develop shared labelling principles, balancing user understanding against the risk of warning fatigue.

Media literacy challenges reflect broader systemic issues beyond platforms alone. These are intertwined with educational policy, media sustainability, and wider societal norms. We recommend that Ofcom explicitly acknowledge platforms as one part of a larger ecosystem and address the distinct roles of government, educators, and civil society organisations.

We commend Ofcom's attention to equality of impact across children, older adults, people with disabilities, and communities with lower digital literacy. We recommend deeper analysis of intersectionality, socioeconomic factors and the correlation between digital exclusion and educational attainment, and regional variations within the UK.

Media literacy needs will continue to evolve alongside technological change. The continued development of generative AI, immersive media, and decentralised platforms will create new challenges and opportunities. We recommend that Ofcom revisit its recommendations every two to three years with input from service providers, charities, technology experts, educators and users.

Turning to mechanisms for encouraging adoption, we believe a multifaceted approach will be most effective. Rather than top-down mandates, we recommend establishing baseline expectations while allowing implementation flexibility. Recognition schemes could provide positive incentives, for example through tiered certification spanning basic compliance, good practice, and excellence to encourage continuous improvement.

For emerging technologies where impact remains uncertain, regulatory sandboxes could allow controlled experimentation with appropriate oversight. Collaborative working groups bringing together platforms, civil society, educators, researchers, and regulators could develop shared understanding. Google would actively participate, contributing technical expertise and implementation experience.

Through these coordinated efforts across evaluation, standards-setting, systemic collaboration, and innovative funding models, we can build a media literacy ecosystem that is robust, sustainable, and genuinely responsive to the needs of all UK citizens.