

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	
Contact phone number	
Representing (delete as appropriate)	Self / Organisation
Organisation name	University of Glasgow Information Integrity Research Network
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.	
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



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>	N/A
<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>	N/A
<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>We welcome Ofcom’s recommendations and, in particular, the emphasis on user empowerment and media literacy by design. At the same time, we urge Ofcom to ensure that the framework does not place disproportionate responsibility on individuals to protect themselves from harms while allowing systems to remain unaccountable. The systems in question include algorithmic architectures that amplify harmful or misleading content, business models that incentivise engagement over accuracy, platform design choices that obscure safety tools, and “safety” interventions that also function as justifications for expanded surveillance and data collection. User empowerment must complement, not substitute for, systemic accountability.</p> <p>Response to Recommendation 1</p> <p>We support the focus on child-friendly language and would encourage Ofcom to go further. A broader simplification of language would benefit all users, not only children. Clear, accessible wording is particularly important for people who are less digitally confident or who have disabilities that make complex text harder to process. This also helps address the issue of children mis-stating their age to access platforms: if all users receive simplified guidance and explanations of key risks and tools, support is not dependent on self-reported age.</p> <p>Response to Recommendation 2</p> <p>We support this recommendation. Prompts that appear at reasonable intervals – for example, “Do you like what</p>

Question	Your response
	<p>you're seeing on your feed?" or "Why is this being shown to me?" – could help users understand and adjust their experience. The design challenge identified in §4.19 of the consultation is therefore crucial: such prompts need to be implemented in ways that feel engaging rather than intrusive or manipulative.</p> <p>We also welcome the proposal in §4.15 that services should clearly inform people, at key moments in the user journey, about the types of content available and the use of recommender systems. More detail would, however, be useful about what users are told when these systems are explained. In particular, if a recommender system is optimised primarily for engagement (e.g. time spent on the platform), service providers should be explicit about this, and about the fact that the content they recommend may lead people away from the topic initially searched for. There is now empirical evidence that such optimisation can drive users towards progressively more extreme or misleading material; see, for example, https://link.springer.com/article/10.1007/s11229-020-02724-x.</p> <p>Response to Recommendation 4</p> <p>We agree that empowering people with tools and contextual information is vital, but would highlight some behavioural constraints that the current recommendations may underestimate.</p> <p>First, people – including children – often avoid blocking others because they worry that the person will find out, or that they may face repercussions either online or offline. Recent research by members of our network shows that young people often hesitate even to call out inaccurate information for similar reasons, despite recognising it as such; see https://onlinelibrary.wiley.com/doi/10.1111/chso.12962?af=R. This suggests that simply providing blocking tools is not sufficient: services should also consider social dynamics (e.g. by making blocking less visible to the blocked party, or by offering alternative ways to quietly down-rank or hide content) and should test whether tools are usable in realistic social contexts.</p> <p>Second, we welcome the suggestions around watermarking, metadata and AI-related labels, but would emphasise the need for these explanations to be delivered in short, engaging formats. In practice, most users want to get on with whatever they came to the site</p>

Question	Your response
	<p>to do and are unlikely to engage with long tutorials or static help pages. Where possible, contextual cues and micro-explanations should be surfaced at the point of use.</p> <p>Third, in relation to §4.28, we would encourage Ofcom to offer more concrete guidance to service providers about the scope and implementation of AI labels. Given the speed at which systems such as Sora-type video generators, Google’s smaller-footprint models and other content-generation tools are evolving, providers are likely to face uncertainty about:</p> <ul style="list-style-type: none"> • which kinds of content require AI-labelling (e.g. images lightly “airbrushed” by AI; wholly AI-produced images; AI-assisted text; or only content that may mislead users about its provenance?); • how such labels should be appended (for example, whether labels travel with content when it is downloaded or reshared on other platforms); and • whether and how labelling requirements should differ across text, audio, image and video formats. <p>More concrete examples or minimum standards here would make the recommendation more actionable and help to ensure consistency across services.</p> <p>Additional terminology point (Recommendations 3 & 5)</p> <p>We suggest reconsidering the term “parental controls”, which can sound restrictive or punitive and may therefore discourage uptake. Alternative framings such as “family settings” or “parental support tools” may better capture the intended empowering role of these tools and would be more consistent with the media-literacy framing of the consultation.</p> <p>Additional note on online payments (Recommendation 5)</p> <p>We also suggest that Ofcom explicitly recognise online payments and in-game purchases as an area where children require targeted media-literacy support. Children frequently find the distinction between real-world money and in-game currency confusing, especially when virtual currency is purchased in bundles whose values are not straightforwardly comparable to everyday prices. This can lead to situations where children are unaware that in-game spending has real</p>

Question	Your response
	<p>financial consequences, or where they are nudged into patterns of impulsive spending. Clearer guidance and in-product messaging about this distinction would complement the existing focus on privacy and safety.</p> <p>Response to Recommendation 7</p> <p>We welcome this recommendation, but note potential applicability risks in highly polarised societies. World Values Survey findings place the UK as one of the most politically polarised societies among the countries surveyed, second only to the US. In such contexts, media literacy efforts themselves can become contested and provoke backlash. For example, 1930s propaganda-education initiatives in the US were ultimately denounced as subversive, and their proponents were driven from their posts; see the historical discussion at https://www.cjr.org/innovations/institute-propaganda-analysis.php. Ofcom may therefore wish to consider how media-literacy programming can be insulated from being framed as partisan – for instance, through transparent governance structures, pluralistic advisory bodies, and a clear separation between content promoting critical skills and content endorsing particular political positions.</p> <p>A related structural challenge is that those communities most susceptible to misinformation may be least reachable through broadcaster partnerships. Recent research on UK Facebook groups opposing low-emissions transport schemes suggests that such groups have become primary sources of local news for participants while also functioning as echo chambers in which mainstream outlets are routinely portrayed as untrustworthy; see http://dx.doi.org/10.1080/17524032.2025.2596616. This raises questions about whether broadcaster-led initiatives alone can reach these audiences, and underscores the importance of integrating Recommendation 7 with the outreach and partnership work envisaged under Recommendations 8 and 9.</p> <p>Response to Recommendation 9</p> <p>We also welcome Recommendation 9 and agree that underserved and diverse audiences require particular attention. The same research on UK Facebook groups opposing climate policies and low-emissions transport schemes (http://dx.doi.org/10.1080/17524032.2025.2596616) offers insight into why certain communities remain</p>

Question	Your response
	<p>underserved. These groups are characterised by deep institutional distrust and feelings of political exclusion; participants frequently understand themselves as locked out of mainstream political channels and misrepresented by national media. In such contexts, interventions that are perceived as top-down, especially when linked to government or major broadcasters, are liable to be dismissed as yet another elite imposition.</p> <p>We therefore suggest that, alongside Recommendation 9, Ofcom explicitly emphasise the need to address underlying conditions of exclusion and distrust as part of media literacy work with underserved groups. Without this, well-intentioned initiatives risk exacerbating disengagement: communities may interpret media-literacy campaigns as attempts to “correct” their views rather than to empower their critical capacities. Partnerships with trusted local intermediaries, including community organisers and non-party civic groups, are likely to be essential here.</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>Additional attention, and precautionary measures with respect to, ways that menu design and user-interface design can contribute to <i>self-radicalisation</i> online would be valuable and timely. Our research shows how the phenomenon of being self-radicalised online can be facilitated by dangerous feedback loops of prescriptive and predictive analytics – which are themselves features of technology design; more clear warning to media users about the risks of radicalisation online and guidance to service providers on this point would be valuable. See https://www.cambridge.org/core/journals/journal-of-the-american-philosophical-association/article/abs/technological-seduction-and-selfradicalization/47CADB240E6141F9C6160C40BC9A6E6CF.</p>
<p>Question 5: Do you have any examples or suggestions of ways of encouraging services to adopt these recommendations?</p>	<p>Setting out clear, specific and measurable expectations. This can be linked to the Online Safety Act, platforms already have duties around: risk assessment, mitigating harms and transparency so framing recommendation as a way to fulfil these duties might increase incentives to adopt them.</p>

Question	Your response
	<p>Engaging the platforms themselves in co-design and discussions around feasibility may reduce friction and increase buy-in.</p> <p>Ofcom could provide models prompts and examples of plain language statements which could be adapted by platforms more easily.</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>N/A</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)

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