

Consultation response form

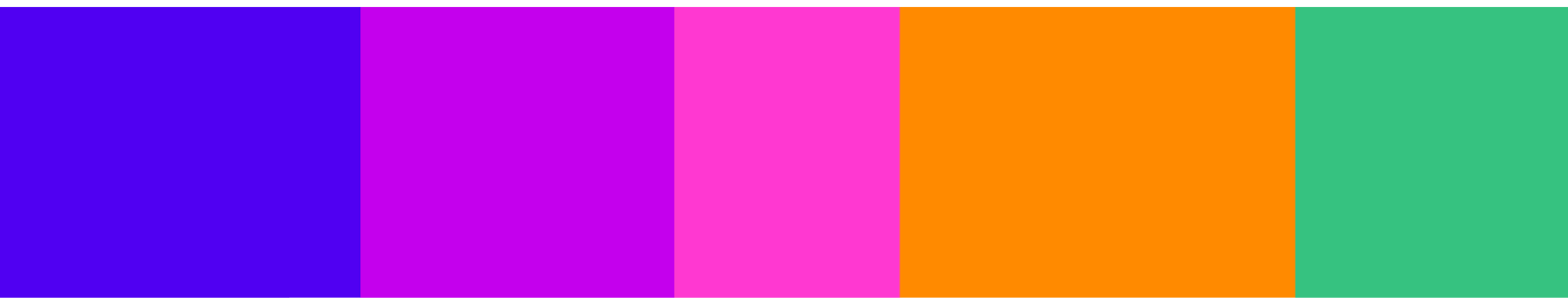
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Consultation title	How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services
Full name	Stéphane Goldstein
Contact phone number	
Representing (delete as appropriate)	Organisation
Organisation name	Media and Information Literacy Alliance - MILA
Email address	

Confidentiality

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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>	<p>Confidential? – N</p> <p>The four categories of organisations set out in chapter 3 are clear and seem to be comprehensive, although as with any fast-moving technology, it is important to ensure that the list of types of services is regularly updated to ensure future proofing. We have two more specific comments/questions:</p> <ul style="list-style-type: none"> • Do the references to online games also include gaming apps? We feel that the gaming ecosystem could be better described in the recommendations. • We note that the recommendations make no reference to mobile operators - yet these could be relevant because they provide device-level opportunities and levers to introduce friction into payment systems.
<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? – N</p> <p>We understand that it is necessary for the recommendations to apply to as wide a range of services as possible. But we also recognise the differences between large players and small organisations, such as micro-scale developers of online games, which do not have the same resources, human and financial, as say PSBs. Moreover, PSBs in particular may have educational obligations, and therefore have a basis for developing appropriate policies, in a way which is more difficult for say a start-up whose reach is also much more limited. But at the same time, smaller platforms can also be harmful, and they too need to adopt media literacy by design principles, provided these are clear just as they adopt accessibility designs.</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 thematic arrangement of the recommendations to follow the user journey is helpful, although we are surprised that only two of them are about product design, with the others being equipping users to deal with the consequences of that design. Designing good practices into services and platforms seems to be critical. But in all</p>

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	<p>cases, the recommendations feel like no more than polite requests with little scope for compulsion or enforcement - all very sensible, but there is too much room for interpretation in them. Platforms could build laudable policies around these, or alternately a bare minimum with little actual impact. And while we recognise the importance of encouraging users to be proactive about taking action - but in practice, harried users may not always have the time to do this, and service providers themselves need to do more to encourage such proactivity and not simply pass the buck to users.</p> <p>Recommendations 1 and 2: these are well intentioned, but we wonder whether they are strong enough in pushing platforms to be transparent about design intended to keep people (including children) online for longer. Helping users understand how their data is being used, why they see certain information in their feed and how they can control this is hugely important. The use of overly long/complex terms of use is not helpful as most people do not read these. Simple choices at the sign-up stage that are clear are vital.</p> <p>Recommendations 3 to 6: these rely on the user to recognise their need for 'training' and could be seen as reactive approaches to media literacy, rather than proactive. Some specific points:</p> <ul style="list-style-type: none"> • The crucial section (recommendation 4) on developing critical faculties, which lie at the heart of MIL, states that "it is vital that service providers support people in developing the critical thinking skills needed to navigate today's complex digital landscape", but it goes on to say that "how they empower their users and audiences will be a matter for them". Unfortunately, this leaves service providers with the option to do as little as they choose to help develop users' critical faculties, and this may be insufficient. The document rightly says that "service providers [should] provide meaningful context about content and sources", but we feel that the recommendation should be stronger and clearer about how media literacy by design should include for instance prompting users before they re-share

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	<p>content, notably asking them to check their sources.</p> <ul style="list-style-type: none"> • Moreover, and more broadly that the responsibility of service providers (also recommendation 4), there is also the question of enabling the 'pre-requisites' for users being critical and empowered, in terms of understanding for instance how algorithms work and the functional model design. This underlines the importance of education, including in schools, to develop people's critical capacity and motivation. Yet the recommendations do not mention this important link with education, other than briefly (recommendation 6) in the context of platforms building relationships with third sector organisations. We feel that the recommendations would benefit from more reference to the role of formal education. • Parental control at sign-up and 'other opportune moments' seems to be weak (recommendation 5). What constitutes an 'opportune moment?' and parental control/ being informed at those points? • There is a recognition (recommendation 5) of the parallel between addictive online behaviour and gambling, but with only weak proposals around transparency and developing users' understanding of monetisation and commercial features. Why not treat the potential for online addictiveness with the same severity and regulation associated with gambling? • It is a rather pious hope (recommendation 6) that online platforms "explore ways to share timely links" (a rather vague and ill-defined notion) with reputable third sector organisations. It also leaves platforms to decide which organisations to link to - a problem that has come up many times before and been kicked down the road. <p>Recommendations 7 to 9: building trust is vital, and platforms need to work together to achieve consistency rather than each try to do this separately. Regarding educational content and skills-building (recommendations 7-</p>

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	<p>8), it is not sufficient to rely on what services and platforms themselves provide: their offerings are liable to be devised to suit their own agendas; and moreover, they could quite easily invest in educational programmes which, whilst sitting outside their products, still follow bad practice themselves. For us, this means a stronger recognition of long-term education independent of service providers and with no strings attached - which links to what we say above in response to recommendation 4. The recommendation recognises the distinct and historic educational role played by the BBC, but the Corporation has a charter that sets out its educational obligations (with media literacy inherent in those) and it is not clear whether that can serve as a model for other PSBs, let alone other players.</p> <p>Recommendation 10: we recognise the fundamental importance of evaluation, and we concur that standards across platforms and services should be agreed to and monitored and evaluated regularly. However, we have two remarks:</p> <ul style="list-style-type: none"> • We wonder whether evaluation might be better conducted in association with neutral third parties so that there are some standard measures across platforms and services. • Given the effort that Ofcom has been putting into developing evaluative methods based around Theory of Change, it is bizarre that this does not feature at all in the recommendations or even in the entire document.
<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>We suggest three areas that would benefit from attention. These are not necessarily additional recommendations - they could be built into the proposed Ofcom recommendations to boost their ambition and/or their clout.</p> <ul style="list-style-type: none"> • Enabling users to have higher expectations for platforms, services and broadcasters to act ethically and in the public interest: • Encouraging users to act when they encounter harmful content or exploitative practices, with

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	<p>service providers to deploy mechanisms which make this easy to do for users.</p> <ul style="list-style-type: none"> • One aspect of media literacy where platforms already do quite a lot of work is around copyright education. Primarily this is to protect the platform from litigation and accusations of copyright infringement on platforms that allow users to upload content. However, this is an area where many services already have thought about some embedded support - so prompts about confirming copyright ownership when users upload content are common. Automated checks also take place on platforms like YouTube, Spotify to try to identify infringing content. A similar approach might be taken with prompting people to think before they share and to fact check misinformation. <p>In line with what we have stated above under recommendation 10, there is a strong case for recommending explicitly the deployment of Theory of Change to help evaluate reach and impact, building on the methodology and practice that Ofcom itself has developed over the past 2-3 years.</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>Under the heading of evaluating and reporting, we suggest the deployment of adapted forms of accreditation, perhaps involving kitemarks or badging, to indicate in a simple and intuitive way that services have met certain defined standards that address media literacy imperatives. But we recognise too that this would be very challenging. Moreover, accreditation would not be mandatory, so there is a need to reflect on what might encourage services to comply. There could be benefits to them through showcasing good practice, maybe also involving awards and commendations.</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? – N</p> <p>We have no comments to make under this heading.</p>

Please tell us how you came across about this consultation.

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- Heard about it at an event
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