

# Consultation response form

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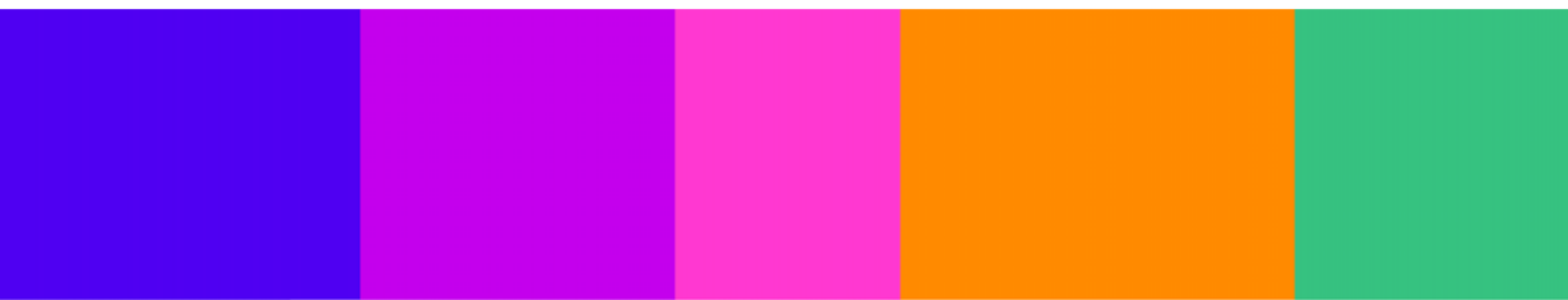
Please complete this form in full and return to [MSOM SoR Consultation@ofcom.org.uk](mailto:MSOM_SoR_Consultation@ofcom.org.uk).

<b>Consultation title</b>	How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services
<b>Full name</b>	
<b>Contact phone number</b>	
<b>Representing (delete as appropriate)</b>	Organisation
<b>Organisation name</b>	Royal Mencap Society
<b>Email address</b>	

## 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](#).

<b>Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.</b>	Nothing
<b>Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.</b>	Part of the response (you will need to indicate below which question responses are confidential)
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	Yes



## Your response

Question	Your response
<p><b>Question 1:</b> 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 N/A</p>
<p><b>Question 2:</b> 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 N/A</p>
<p><b>Question 3:</b> 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>We welcome the overall intention to develop media literacy through the proposed recommendations, especially with recommendation one which would require inclusive design choices. ‘Inclusive design’ has a wide interpretation and can have a different meaning from ‘accessible design’. The inclusion of ‘people with disabilities’ is welcome in the recommendation however, the wording of recommendation 1 should be changed from ‘inclusive design’ to ‘inclusive and accessible design’. This clarity would help ensure service providers create accessible versions of documents to meet the needs of people with a learning disability; for example, easy read and videos.</p> <p>Recommendations 2 and 3: We recommend that preferences should be set at signup by default, rather than expecting people with a reduced intellectual capacity to know what choices may be appropriate for them.</p> <p>Mencap’s research shows that whilst people with a learning disability may understand that something is not accessible, they might not be able to understand what tools or digital preferences would make it more accessible for them. <a href="#">See here for more</a></p> <p>For this reason, we should not expect users with a learning disability (or other forms of reduced intellectual capacity) to be responsible for making their own accessibil-</p>

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	<p>ity choices. The system should be designed to be accessible by default, and we have found that building accessible systems benefits the wider population.</p> <p>Similarly, any choice of preferences in relation to recommender systems needs to be made appropriate for people with a reduced intellectual capacity. This could be tied to the default settings of a 'supervised adult' account as above.</p> <p>The proposals in recommendation 4 on requiring service providers to "actively support users in deploying tools" is welcome given the current inaccessibility of tools such as 'reporting' and 'blocking' other users. This active support should include accessible formats, such as easy read and videos, alongside streamlining the design of these tools to increase their useability. Alongside this, service providers should promote accessible updates on the progress of how a service provider is dealing with any reporting of a post or account as currently some reporting processes are opaque leaving people with a learning disability with diminished trust in these tools and processes.</p> <p>We are concerned about the limited application of recommendation 7 which seeks to "help people understand, interpret and assess the credibility of information". This recommendation should apply to all services. For example, X provides a 'fact checker' for content, which is an attempt to help people 'understand, interpret and assess the credibility of information'. It is crucial that this element of X, and similar elements, operate within the framework of Ofcom's media literacy strategy. This would help tackle any potential mislabelling of information on the platform and others that provide a similar element, especially as Ofcom found that 51% of UK adults using social media to get their news.</p> <p>It is unclear which groups are included within the definition of "underserved and diverse audiences" within recommendation 9. This term should include people with a learning disability; however, this requirement should be part of all the other recommendations to support the development of accessible documents and information.</p> <p>We welcome the intentions behind recommendation 9 which will help to drive forward the provision of accessi-</p>

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	<p>ble design that meets the needs of people with a learning disability. Rather than simply consider, we feel service providers should be using inclusive and accessible design as a base level. We also feel that labelling initiatives as potentially “complex and resource-intensive” could have a counter-productive impact on service providers. Rather the recommendation should focus on the benefits of co-production and design for service users. Also co-production and design can be cost neutral or cheaper in the long-run for service providers due to co-production and design helping service providers create the right content from the offset potentially reducing the need for redesigns as well as the supporting users to feel more supported and secure and therefore potentially spending more time on the service or joining the service provider.</p> <p>Providing annual statements on media literacy activities is a welcome recommendation to ensure that service providers are updating their programmes and content to reflect any changes in technology developments or changes to the service itself. It would also provide a level of transparency which will help to build trust with groups, such as people with a learning disability, who have found using, and reporting abusive content, difficult or unsatisfactory in the past.</p>
<p><b>Question 4:</b> 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>Co-production is key to ensuring that inclusive and accessible design delivers truly accessible documents and information. This should be the basis for the development of the ‘media literacy by design’ from the start rather the requiring revision from the audience once released.</p> <p>Throughout the recommendations, it should be noted that people with a learning disability of all ages may also benefit from the suggestions designed to safeguard children.</p> <p>Many of the tools designed for children could be designed to work for adults with a learning disability too. The same tools may also be beneficial for other population groups such as the elderly or people with dementia.</p>

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	<p>Tools should be designed in such a way as to not infantilise adults with a learning disability, whilst allowing them to engage with age-appropriate content in a supervised and safe way. For this reason, it would be preferable to have a new type of 'supervised adult' account to work alongside a child account.</p>
<p><b>Question 5:</b> Do you have any examples or suggestions of ways of encouraging services to adopt these recommendations?</p>	<p>Confidential? – Y</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
<p><b>Question 6:</b> 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>

**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)

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