

# Molly Rose Foundation response to Ofcom's consultation on How to promote Media Literacy

December 2025

## Overarching reflections

### Why media literacy matters

- Molly Rose Foundation (MRF) welcomes the opportunity to respond to Ofcom's consultation on How to promote Media Literacy.
- Alongside robust regulation that ensures online platforms are safe by design, Media Literacy is key to keeping children safe and preventing mental ill health, suicide, and self-harm. In a context where we lose one young person aged 10-19 to suicide where technology plays a role every week,<sup>1</sup> it is a vital line of defence, empowering children to identify and critically evaluate harmful content and other threats, and make safe and informed decisions about their online experiences. Media literacy is associated with improved wellbeing and can be a protective factor against depression, low self-esteem and eating disorders.<sup>2 3</sup>
- MRF place particular emphasis on the importance of critical algorithmic literacy, defined as a critical understanding of how algorithms influence content, decisions, and outcomes, and the functional skills needed to navigate these effects.<sup>4</sup> Algorithmic recommendation is now recognised to play a central role in online harm of all kinds, and poses particular risks for mental wellbeing, causing unintentional exposure to harm through amplifying viral or trending content, or creating devastating echo chambers where vulnerable young people are bombarded with ever more extreme content – as was tragically the case for 14-year-old Molly Russell.<sup>5</sup> In this context, able to critically engage with and take control of algorithmic effects is crucial, and also support broader objectives around improved agency and choice over online experiences.
- Beyond protection from harm, improved media literacy recognised to have a range of wider benefits, for both individuals and society. It increases economic potential, growth, and positive outcomes for health, communities and our democracy. This has recently been reiterated by reports from the Science, Innovation and Technology Committee<sup>6</sup> and House

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<sup>1</sup> Rodway et al. (2022) Online Harms? Suicide related online experiences. *Psychological Medicine*, 53(10), 1-12.

<sup>2</sup> Matthews, H. (2016) The effect of media literacy training on self-esteem and body-satisfaction

<sup>3</sup> National Literacy Trust (2021) Literacy, critical digital literacy and wellbeing in 2021

<sup>4</sup> Dogruel, L. (2021) What is Algorithm Literacy? A Conceptualization and Challenges Regarding its Empirical Measurement. In M. Taddicken, & Schumann (Eds.), *Algorithms and Communication*, 67-93.

<sup>5</sup> The inquest into Molly's death heard that she saw 2000 items of harmful depression, suicide, and self-harm content on Instagram alone in the months before she died.

<sup>6</sup> Science Innovation and Technology Committee (2025) Social media, misinformation and harmful algorithms

of Lords Communication and Digital Committee, which concluded that ‘social cohesion is at risk and democracy itself is threatened by inadequate media literacy.’<sup>7</sup>

### **A missed opportunity to complement and strengthen the online safety regime**

- Overall, though the recommendations in this consultation are welcome, they leave significant gaps in ensuring platforms take adequate action to promote media literacy.
- In particular – and though we acknowledge that media literacy is broader in scope than online safety – this consultation is a significant missed opportunity to strengthen and complement the wider online safety regime.
- Despite the regulator’s recognition that media literacy and online safety are ‘mutually reinforcing’, and the intentions set out in the Department for Science, Innovation and Technology’s Statement of Strategic Priorities for Online Safety<sup>8</sup> (that Media Literacy can help tackle a wide variety of online safety issues) many of the proposals in this document are ambiguous, insufficiently outcome-focused, limited in scope, and fail to address the underlying systems that undermine media literacy. They also lack the robust approach to transparency and accountability necessary to drive compliance with voluntary measures. As such, they are unlikely to deliver meaningful improvements in users’ ability to avoid harmful content, think critically about what they do encounter, and make informed decisions about how engage safely with online spaces.
- This is particularly concerning in the context of Ofcom’s wider unambitious approach to implementing the Online Safety Act, with a clear need for robust media literacy that can address glaring shortfalls in the implementation of safety duties. As highlighted by MRF in previous consultations, the Protection of Children Code, Illegal Content Code and draft Additional Safety Measures continue to leave significant gaps in responding to the scale and evolving dynamics of how suicide, self-harm and mental wellbeing risks manifest online, with a continued failure to deliver the fulsome safety-by-design approach envisaged when the Act was passed.<sup>9</sup> We have also now heard that the regulator does not expect to consult on any further measures until late 2027, with any new measures not coming into force until 2028.<sup>10</sup>
- We would strongly urge the regulator to demonstrate significantly more ambition in the next iteration of these proposals, particularly given the free rein afforded by an emphasis on ‘best practice’. The limited ambition set out in this consultation ultimately seems to contradict recent framing from the Government that media literacy is a ‘fundamental skill in the digital age.’<sup>11</sup>

### **Clearer integration with wider safety duties on regulated services**

- Though we acknowledge Ofcom’s point that the recommendations set out in this consultation are ‘distinct’ from the statutory obligations imposed on services regulated

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<sup>7</sup> House of Lords Communications and Digital Committee (2025) Media Literacy

<sup>8</sup> Department for Science, Innovation and Technology (2025) Final Statement of Strategic Priorities for Online Safety

<sup>9</sup> Please see MRF’s responses to previous Ofcom’s Consultations on Additional Safety Measures, Protection of Children and Illegal Content.

<sup>10</sup> Ofcom (2025) Online Safety in 2025

<sup>11</sup> HM Government (2025) Government Response to House of Lords Communications and Digital Committee’s 3rd Report on Session 2024-25 on ‘Media Literacy’

under the Online Safety Act, strengthened proposals should do far more to promote an integrated approach that emphasises the role media literacy can play in supporting online safety outcomes. While distinct regimes, there is nothing that prevents Ofcom from ensuring these approaches are complementary and deliver towards a consistent set of media literacy, user agency and safety and wellbeing-by-design objectives.

- The current approach is symptomatic of a wider pattern of siloed approaches to media literacy and ‘core’ online safety activities, with media literacy de-prioritised, underfunded and in many senses seemingly disconnected from the regime as a whole.<sup>12</sup>
- In its initial framing, for example, Ofcom could emphasise how adopting these recommendations can support wider safety duties imposed on services, including risk assessment duties which require services to consider how they can use media literacy measures to mitigate the risks of harmful content on their platforms.
- This could be underpinned by a clear framework, setting out in particular how these recommendations relate to measures within codes of practice already focused on media literacy and agency – i.e. measures within the Protection of Children code focused on settings, functionalities and user support, user controls, and terms of service. This should be updated with the introduction of new measures in Codes of Practice relating to user empowerment duties on Category 1 services.
- MRF recognise that the recommendations in this consultation apply to services outside of those regulated under the Online Safety Act. However, this should not prevent the regulator setting out a more clearly integrated approach to online safety for those that are.

### **Driving compliance through transparency and accountability**

- Given the voluntary nature of these recommendations, it is crucial that Ofcom uses all the levers at its disposal to encourage take-up. This is particularly pertinent given that – as of summer 2025 – only four platforms had pledged to deliver Ofcom’s similarly voluntary Best Practice Design Principles.
- MRF do not have confidence that the regulator’s current approach to encouraging compliance, largely set out in recommendation 10, will lead to action with the scale, urgency and ambition that is clearly needed. Though we recognise the need to balance expectations and work with services given a lack of formal obligations, a more robust approach is clearly needed to drive take-up.
- Ultimately, MRF strongly agree with civil society and other organisations that a strengthened Online Safety Act should impose clear duties on platforms and search engines to promote media literacy – and wellbeing – both by design and beyond their services. Ofcom should also continue to explore how media literacy by design can be worked into future OSA codes of practice within existing safety duties.
- In the more immediate term however, we strongly encourage the regulator to clarify how it will use its existing transparency and information gathering powers to drive compliance for services regulated under the Online Safety Act. This was a key recommendation of the

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<sup>12</sup> Ofcom has stated it has 12 core staff and a budget of £1.62 million for implementing its media literacy strategy, compared to a team of 346 and a £169 million for implementing the wider online safety regime.

House of Lords Communications and Digital Committee inquiry into Media Literacy,<sup>13</sup> and there are clear provisions in place for this. Ofcom's Final Transparency Guidance, for example, makes clear that transparency notices can require services to supply information on 'measures taken or in use by a provider to improve the media literacy of users, and an evaluation of the effectiveness of such measures.'

- As a minimum, we urge the regulator to adopt principles from its action plan for driving compliance with recently published Guidance on a safer life online for women and girls,<sup>14</sup> including close supervision arrangements with platforms, and regular public reporting on progress made by individual providers and the industry as a whole in promoting media literacy.
- It is not clear why the regulator has not already opted to set out a stronger approach, given specific references in its Three-year Media Literacy Strategy to using 'available levers' to support its engagement with platforms - including its evidence gathering powers, supervisory relationship with services, and regular reporting of where services could be doing more.<sup>15</sup> Given the lag time between the strategy and this consultation, we are disappointed by recent statements that the regulator 'continues to develop its plans in this area.'<sup>16</sup>
- We would also urge the regulator to add further recommendations around governance of platforms' media literacy activities, above and beyond the recommendation to publish a media literacy policy. This could mirror governance arrangements used elsewhere in the online safety regime, encouraging services to introduce regular reviews, accountable individuals, and written statements of roles and responsibilities.

#### **Outcomes-based recommendations, building on minimum standards**

- MRF has an overarching concern that the current set of draft recommendations are insufficiently clear, overly high-level and lack detail on the outcomes required. Though we recognise the voluntary nature of these proposals and the need to ensure relevance across a range of service types and sizes, the current approach would seem to allow services to claim compliance while paying lip service to meaningfully supporting media literacy.
- Throughout, we would strongly Ofcom to set out more detailed minimum standards of delivery, underpinned by clearly articulated outcomes that ensure services' activities are anchored around their intended positive impact.
- For example, Recommendation 1 currently recommends only that 'service providers prioritise age-appropriate design that emphasises simplicity, safety, and clarity in both content and data practices.' For each service in scope of these recommendations, this could be defined far more clearly, setting out a detailed 'menu' of different features that services should both promote and prohibit to support positive media literacy outcomes for different age groups.

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<sup>13</sup> House of Lords Digital and Communications Committee (2025) Media Literacy

<sup>14</sup> Ofcom (2025) Tech firms must up their game to tackle online harms against women and girls

<sup>15</sup> Ofcom (2024) A Positive Vision for Media Literacy: Ofcom's Three-Year Media Literacy Strategy

<sup>16</sup> Ofcom (2025) Response to House of Lords Communications and Digital Select Committee Inquiry into Media Literacy

- We would also encourage the use of case studies to demonstrate what media literacy ‘by design’ or ‘during use’ might look like for different services – an approach that Ofcom’s has used in its VAWG guidance.
- We are particularly concerned by the lack of specificity on what good practice would look like to for children with different capacities and vulnerabilities, beyond high level references and examples of ‘inclusive design practices’ in recommendation 9. This is explored in more detail below.
- This concern also applies to recommendations around building trust beyond services and evaluation, with no robust standards and limited articulation of what good looks like.

## Reflections on specific recommendations

### Recommendations 1 & 2: Media Literacy by design

- While Ofcom’s emphasis on media literacy by design is welcome, its interpretation of this principle as set out in Recommendations 1 and 2 is disappointingly limited.

### *Addressing underlying systems and persuasive design*

- MRF has serious concerns about the regulator’s lack of emphasis on ensuring service design does not undermine media literacy, actively frustrating users’ ability to have informed choice, meaningful control over online experiences, or critical engagement with the content they encounter.
- Despite mentioning that children ‘should not be expected’ to navigate persuasive design features, the regulator’s examples of age-appropriate design (default privacy settings, simplified language and clear explanations of features) are largely add-ons to existing systems that place the onus on users, rather than addressing the root causes of a chaotic information environment.
- This unfortunately appears to mimic Ofcom’s understanding of Safety-by-Design in its implementation of the Online Safety Act, which is characterised by an emphasis on post-hoc intervention rather than upstream measures.
- As referenced in this consultation, extensive previous research shows how online services use ‘dark patterns’ and other well-established user design techniques to encourage users to take content and consent decisions that may not be in their own best interests. This can include features that capture and hold users’ attention, create habitual behaviours, ‘nudge’ them to engage with content or interact with others in a certain way.<sup>17 18</sup>
- Algorithmic feeds are the archetypal example – with frictionless scroll, the rapid development of filter bubbles, and business models that incentivise the spread of

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<sup>17</sup> Hilton, M (2023) Dark Patterns and User Mental Health: Identifying Theoretical Impacts of Deceptive Design on Vulnerable Demographics. Proceedings of the Human Factors and Ergonomics Society Annual Meeting

<sup>18</sup> 5Rights Foundation (2023) Disrupted Childhood: The cost of persuasive design

dangerous content all undermining agency and critical engagement with content.<sup>19</sup> Recent Molly Rose Foundation has identified that services continue to develop these features at pace. This includes the introduction of new AI generated search prompts that allow users to more readily enter ‘rabbit holes’ of harmful content, as well as the rollout of colour-coded ‘trending’ topics that can incentivise the discovery of harmful content.<sup>20</sup>

- This is even more pressing given increasing usage of AI chatbots, and emerging evidence of how they use a range of persuasive and engagement-based techniques to keep users engaged for as long as possible or steer their behaviour. This includes the use of ‘manipulative farewells’ intended to maximise engagement,<sup>21</sup> as well as the use of affirming and sycophantic prompts that deliberately mirror user beliefs and therefore may distort long-term critical thinking.<sup>22</sup> MRF is profoundly concerned by the implications of these design features for mental health and suicide risks, with the focus on affirming responses coupled with a lack of safeguarding / safety interventions resulting in suicide and self-harm responses that have often been inadequate or inappropriate. This has already led to tragedy.<sup>23 24</sup>
- In this context, Ofcom must make it far more explicit that services must address how underlying persuasive design may undermine media literacy, and particularly those that target or disproportionately affect child users.
- This should be supported by a clear framework setting out how design features can undermine literacy (building on the work of 5Rights<sup>25</sup> and others), alongside explicit recommendations that services should either remove these features, or offer key functionalities that directly address persuasive design features. This could include – for example - options to turn off personalisation, reset recommender feeds, change the settings on AI chatbots, and limit content to followed accounts.

### *Stronger promotion of algorithmic literacy*

- MRF strongly agrees that is vital to offer clear, meaningful choices at key points in the service experience, and we warmly welcome the regulator’s emphasis on recommender systems and ensuring users understand how these product surface work and what they can do to influence them.
- Algorithmic recommendation now plays a vital role in how we engage with information of all kinds. It also central to the overwhelming scale of online harm of all kinds, including mis/disinformation, extremism, prejudiced views and suicide and self-harm content.<sup>26</sup>

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<sup>19</sup> Science, Innovation and Technology Committee (2025) Social media, misinformation and harmful algorithms

<sup>20</sup> Molly Rose Foundation (2025) Pervasive by Design

<sup>21</sup> DeFreitas, J et al. (2025) Emotional Manipulation by AI Companions. Harvard Business School Working Paper No. 26-005

<sup>22</sup> Cotra, A. (2021) Why AI alignment could be hard with modern deep learning. Cold-Takes

<sup>23</sup> Reiley, L. (2025) What Chat GPT Told My Daughter before She Took Her Life. Published in New York Times, 24th August 2025

<sup>24</sup> Yousif, N. (2025) Parents of teenager who took his own life sue OpenAI. Published in BBC news, 27th August 2025

<sup>25</sup> 5Rights Foundation (2023) Disrupted Childhood: The cost of persuasive design

<sup>26</sup> Science, Innovation and Technology Committee (2025) Social Media, misinformation and harmful algorithms.

Recent MRF research, for example, found that 37% of children aged 13-17 had seen at least one type of content likely to be classed as harmful under the Online Safety Act, with recommender feeds by far the highest risk product surface.<sup>27</sup> Many of the children in our sample also appeared to be trapped in harmful ‘filter bubbles’, seeing high risk content (e.g. content promoting self-harm) alongside significant volumes of compounding material (e.g. content about feeling sad, down or lonely).

- In this context, developing critical algorithmic literacy is essential, with early evidence that it can help children build resilience, avoid harmful content, and engage with content more intentionally and mindfully.<sup>28</sup> Key dimensions of algorithmic literacy include a) awareness that algorithms are being used on a service, b) understanding of how they function, c) being able to critically engage with their effects – including on mental health and wellbeing, and d) having the skills to influence algorithmic operations.<sup>29</sup> However, levels of algorithmic literacy vary significantly, with some evidence that this may present a new digital divide.<sup>30</sup> Ongoing research conducted by MRF in collaboration with the University of Bristol also suggests that this is poorly addressed in schools.
- Though the proposals in this consultation speak to these outcomes, in their current iteration they insufficiently take into account the specific dynamics of the threats that recommender feeds pose to young people’s mental wellbeing.
- We encourage the regulator to strengthen this recommendation through clarifying that users should *repeatedly* be provided with information about the use of recommender systems, why they are seeing certain content, and what they can do to influence this – rather than just at sign-up or profile creation.
- There is well-established evidence that algorithms underpin potentially protracted pathways to harm - with the cumulative effects of exposure to harmful content building up over time, young people slowly developing harmful suicide or self-harm identities via ‘assortative relating’,<sup>31</sup> and even coming to view the amount and type of harmful content being recommended to them as a proxy for their mental health.<sup>32</sup>
- As such, there is a clear case for repeated algorithmic literacy interventions, with tailored messages relevant to the type of content a user is encountering triggered by concentrations or durations of exposure to harmful content (including content that can contribute to cumulative harm but would not be classed as harmful).

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<sup>27</sup> Molly Rose Foundation (2025) Children’s exposure to suicide, self-harm, depression and eating disorder content

<sup>28</sup> Winstone, L. (2024) Developing algorithmic literacy for positive social media engagement. The Churchill Fellowship.

<sup>29</sup> Dogruel, L. (2021) What is Algorithm Literacy? A Conceptualization and Challenges Regarding its Empirical Measurement. In M. Taddicken, & C. Schumann (Eds.), *Algorithms and Communication* (pp. 67-93).

<sup>30</sup> Gran, A. et al. (2021) To be or not to be algorithm aware: a question of a new digital divide? *Information, Communication & Society*, 24(12), 1779–1796.

<sup>31</sup> Arendt, F et al (2019) Effects of exposure to self-harm on social media: evidence from a two-way panel study among young adults. *New Media and Society*, 21, pp2422–2442

<sup>32</sup> Molly Rose Foundation (2023) Preventable yet pervasive: prevalence and characteristics of harmful content, including suicide and self-harm material, on Instagram, TikTok and Pinterest

- We are also concerned by the recommendation that platforms should explain ‘how people can influence [recommender systems].’ Despite evidence that young people want to exert control over algorithmic curation (and tragically blame themselves when they are not able to do so) many platforms do not provide sufficient tools to allow for this.<sup>33</sup>
- As it stands, the only existing obligation on services to allow users to influence algorithmic operations is set out in Ofcom’s Protection of Children Code (PCU E3), where platforms are required to allow children to give negative feedback on content they are served by recommender systems. However, not only does this measure not apply to all users, it is also weakly worded, requiring only that platforms ‘reduce the likelihood’ of the user encountering similar content.<sup>34</sup> MRF has also seen evidence that services may be choosing to subvert this requirement, offering child accounts the opportunity to give positive feedback on algorithmic results, and therefore potentially opt to be served more harmful content.<sup>35</sup>
- As above, we would strongly urge Ofcom to explicitly recommend that services introduce tools to offer a wider range of meaningful choices about algorithmic curation, including the option to ‘reset’ algorithmic feeds.

### *Strengthening the information supply chain*

- Alongside recommendations focused on promoting agency and informed choice over online experiences, MRF would strongly urge Ofcom to explore approaches focused on improving the underlying information supply chain by encouraging the promotion of positive high-quality, UK-based civics and health content on online services - including from public service broadcasters and national health services. This would build on recommendations 6 and 7, which set a precedent for encouraging the creation and/or promotion of certain kinds of content.
- This approach has been proposed by Demos<sup>36</sup> in the context of tackling the democratic emergency, but has clear applications for improving wellbeing via the promotion of trustworthy health content. This would build on ‘must carry’ obligations placed on Public Service Broadcasters to ensure that content with public service value is given due prominence to users online. This has already been recommended by the regulator in the context of its Public Service Media Review and is something that broadcasters themselves have called for.<sup>37</sup> In September of this year, the Culture Secretary said that the Government was prepared to introduce legislation so that YouTube carries public service content more prominently.<sup>38</sup>

## **Recommendations 3, 4 and 5: Empowering people during use**

### *Ensuring that tools and features to support media literacy are effective*

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<sup>33</sup> Livingstone, S et al (2025) Can platform literacy protect vulnerable young people against the risky affordances of social media platforms? *Information, Communication & Society*, 1-18.

<sup>34</sup> MRF research into the effectiveness of measures introduced by Meta’s teen accounts found that these

<sup>35</sup> Molly Rose Foundation (2025) *Pervasive by Design*

<sup>36</sup> Demos (2025) *Epistemic Security 2029: Fortifying the UK’s Information Supply Chain to Tackle the Democratic Emergency*

<sup>37</sup> Broadcast (2025) *PSB chiefs: these measures can help secure distinct British broadcasting for the future*

<sup>38</sup> Kanter, J (2025) *UK Government Ready to Change Law so YouTube Carries Public Service Content Prominently*. Published in *Deadline*, 17th September 2025

- MRF strongly support the broad range recommendations focused on empowering people during their use of services.
- However, the current wording of these recommendations – focused on ensuring that tools are ‘simple [and] accessible’, and ‘actively supporting users in deploying [them]’ is unlikely to address the strong evidence that many safety tools on digital platforms are woefully ineffective.
- Recent MRF research with over 1,800 children aged 13-17, for example, found that many children feel they have little agency over what they see online, with less than a third of those who had encountered upsetting content feeling that there was always something they could do to avoid this.<sup>39</sup> This is substantiated by recent research conducted by MRF in collaboration with Arturo Bejar, Cybersecurity for Democracy and partners which found that, of the 47 safety tools introduced by Instagram’s Teen Accounts, almost two-thirds (64%) were either ineffective or unavailable, and only 17% worked as advertised.<sup>40</sup>
- This included a number of tools specifically designed to improve choice over online experiences and promote critical engagement with content. For example, of the seven tools and prompts advertised in press releases by Meta that aimed to address excessive time spent or encourage more balanced usage, five had either been discontinued or contained significant flaws. Similarly, using the ‘not interested’ feature on Instagram was not found to significantly alter the type of content recommended by Instagram. In one ‘red-team’ test, for example, researchers indicated that the test avatar account was not interested in a series of Reels showing graphic injury, but were subsequently shown further videos of a similar nature.<sup>41</sup>
- This was also true for parental controls. For example, Instagram’s Family Center and Parental Supervision Tools were found not to accurately present what a teen account was experiencing, failing to notify parents of key activities relevant to online risks.
- In this context, MRF strongly recommend that Ofcom’s recommendations go far further to establish best practice that focuses on the intended outcomes that tools should be achieving for users, rather than just how accessible or easy to deploy they are.

### **Recommendation 8: Promote media literacy beyond services**

*Ensuring action to promote media literacy beyond services is consistent, strategic, and high quality*

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<sup>39</sup> Molly Rose Foundation (2025) Chi

<sup>40</sup> Molly Rose Foundation, Arturo Bejar, Cybersecurity for Democracy and Partners (2025) Teen Accounts, Broken Promises

<sup>41</sup> Ibid.

- Though services have played a key role in funding the delivery of media literacy initiatives to date, there are a number of key issues that are not addressed by this recommendation.
- Funding for media literacy initiatives has long been characterised by short-termism and instability – leading to inefficiencies, duplication, limited reach, and failures to adequately evaluate and then scale initiatives.<sup>42</sup> This is driven both by services (with programmes repeatedly cut short as priorities change) and Government, with DSIT’s new Digital Inclusion Innovation Fund lasting only a single initial year.
- Relying primarily on services’ contributions also establishes an unhealthy dependence on the knowledge and strategic expertise of platforms who may not be best placed to deliver the highest quality interventions, or to effectively allocate these to meet the needs of different communities. We disagree with DSIT’s characterisation of this arrangement as a ‘dynamic funding landscape’ that allows for a more ‘effective and inclusive foundation’, particularly given the Government apparently does not intend to conduct an impact assessment of the 2021-2024 Online Media Literacy Strategy (which used this model).<sup>43</sup>
- Though well-intentioned, these recommendations are highly unlikely to address these challenges and deliver meaningful, long-term commitments in funding that are strategically allocated, particularly given Ofcom’s failure to expand on references in its Three-year strategy to using ‘available levers’ to encourage this.
- Instead, MRF would strongly urge the regulator to explore funding arrangements that allow for a more robust, and balanced landscape, where contributions from companies sit alongside greater centrally allocated funds.
- MRF strongly support the House of Lord’s Digital Committee’s recommendation for the introduction of a levy on platforms to secure long-term, stable funding from industry for independent media literacy initiatives.<sup>44</sup> This is something we have repeatedly called for to support not only media literacy but also wider prevention activities and civil society and academic research. A relatively modest extension of the levy (e.g. to category 1 firms regulated under the OSA) could make a transformative difference to promoting media literacy consistently and at scale, and would mirror arrangements in other sectors where consumer protection arrangements are the norm. This could be further enhanced by the reinvestment of regulatory fines into media literacy and other prevention activities, as is the case in other regulatory contexts.<sup>45</sup>

### **Recommendation 9: Supporting the media literacy of diverse audiences**

- As above, MRF is concerned by the lack of specificity on what good practice would look like to for children with different capacities and vulnerabilities, beyond high level principles and examples of ‘inclusive design practices’
- For example, despite references to age-appropriate design, Ofcom provides no specific guidance on how design can take into account the evolving capacities of children in different age groups.<sup>46</sup> The idea of age appropriate design itself also appears to contradict

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<sup>42</sup> DSIT (2023) Cross-sectoral challenges to media literacy

<sup>43</sup> DSIT (2025) Government Response

<sup>44</sup> House of Lords Communications and Digital Committee (2025) Media Literacy

<sup>45</sup> Ofgem (2025) Ofgem enforcement action leads to £150m funding for vulnerable energy consumers

<sup>46</sup> 5Rights Foundation (2023) Child Rights by Design

claims made by the regulator elsewhere that it is unable to introduce differentiated protections that take into account the risks to children at different ages under 18.

- MRF are also seriously concerned by the regulator’s lack of attention to meeting the needs of children with SEND. Children with SEND are both more likely to be exposed to online risks, and more likely to find core media literacy competencies difficult – including recognising risk, applying critical thinking, and managing their privacy.<sup>47 48</sup> It is a profound failure therefore that the regulator has opted for a vague, one-size-fits-all approach, rather than drawing on specific evidence to set out what works to support children with a range of offline vulnerabilities.
- We strongly urge the regulator to address this gap, and deliver on commitments in its Three-Year strategy to ensure media literacy provision works for children with special educational needs and disabilities, communication difficulties, experience of care, mental health difficulties and/or physical impairments.

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<sup>47</sup> Internet Matters (No Date) Special educational needs and disabilities

<sup>48</sup> Internet Matters (No Date) Supporting children with special educational needs and disabilities