

Consultation response form

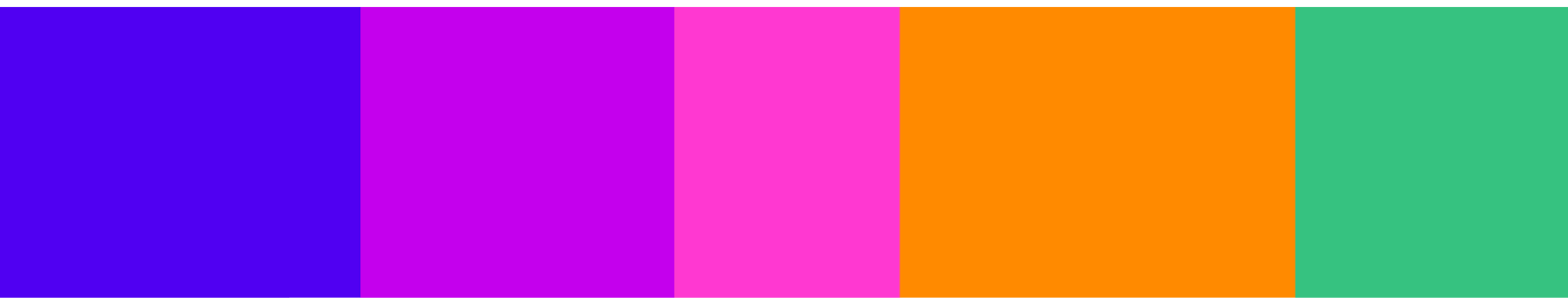
Please complete this form in full and return to [MSOM SoR Consultation@ofcom.org.uk](mailto:MSOM_SoR_Consultation@ofcom.org.uk).

Consultation title	How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services
Full name	Morgan Flack
Contact phone number	
Representing (delete as appropriate)	Organisation
Organisation name	NAHT
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.	Nothing
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? – Y / N</p> <p>N/A</p>
<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? – Y / N</p> <p>N/A</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> <ol style="list-style-type: none"> 1. NAHT welcomes the opportunity to submit evidence to Ofcom’s consultation on recommendations for online platforms, broadcasters and services. 2. NAHT is the UK’s largest professional trade union for school leaders. We represent more than 38,000 head teachers, executive heads, CEOs, deputy and assistant heads, vice principals, school business leaders and middle leaders. Our members work across the early years, primary, special and secondary schools; independent schools; sixth form and FE colleges; outdoor education centres; pupil referral units, social services establishments and other educational settings. 3. In addition to the representation, advice and training that we provide for existing school leaders, we also support, develop and represent the school leaders of the future. We use our voice at the highest levels of government to influence policy for the benefit of leaders and learners everywhere. 4. Our response will focus on the impact of the recommendations in relation to the impact of digital services on children and young people. 5. Children and young people are increasingly engaging in the digital world, which has become a fundamental part of their day-to-day lives, and therefore need support and guidance to understand the boundaries. The UK Safer Internet Centre found, in their 2023 report, that

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	<p>almost half (47%) of 8–10-year-olds said they went online at least three to four times a day, while over three quarters (76%) of 11-13-year-olds and almost nine in ten (86%) of 14-17-year-olds said this.</p> <p>6. While there are many positive benefits associated with the digital world, including the sociability of online gaming and improved accessibility for children and young people with communication challenges, including neurodiversities, there are also significant potential risks involved.</p> <p>7. These include the rise of encountering inaccurate, harmful or discriminatory content, such as that perpetrated and disseminated by ‘influencers’. 83% of secondary school teachers reporting that they are worried that Andrew Tate’s views, or influencers with similar views, are directly having a negative effect on male pupils’ behaviour.</p> <p>8. The Children’s Commissioner has also highlighted the concerning rise of the creation of sexually-explicit deepfakes with freely-available generative AI-tools, pointedly underlining that the technology used to produce them ‘remains legal and accessible through the most popular parts of the online world, including large social media platforms and search engines’ .</p> <p>9. There is a clear need for collective responsibility to tackle these risks, and allow children and young people the freedom to embrace the opportunities and benefits of the digital world..</p> <p>10. NAHT strongly believes in the role and benefit of education designed to support children and young people’s media literacy and engagement in the digital world. Schools have a long-established role in educating children and young people about both the digital world, including how to be digitally literate and resilient as digital technology becomes increasingly integrated into everyday life, and online safety, notably the benefits, risks, and consequences of their online behaviour, which includes social media.</p> <p>11. However, NAHT is also clear that social media providers and online platforms must take responsibility in providing a safe online environment, including regulat-</p>

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	<p>ing the access children and young people have to inappropriate online content as well as supporting them to be able to understand, interpret and critically assess the content they encounter.</p> <p>12. NAHT believes that service providers must offer high-quality guidance and tools for parents, carers, and education staff as that is imperative to these groups being both knowledgeable and confident to address the complexities and sensitivities relating to online safety and social media usage for children and young people.</p> <p>13. Therefore, NAHT welcomes the recommendations proposed by Ofcom, as a positive first step in recognising the responsibility of service providers in the content they publish, and in ameliorating the issues associated with harmful and discriminatory content.</p> <p>14. While NAHT recognises the role that parents and carers play in helping their children to navigate the digital world, and welcomes the introduction of support to help this, NAHT is clear that this must not represent a shifting of the responsibility onto users, especially children and young people, to mitigate against the effects of encountering inaccurate, harmful, and discriminatory content.</p> <p>15. As such, NAHT remains steadfast in its position that as part of the introduction of the Online Safety Act, Ofcom’s focus must remain on monitoring and evaluation of the compliance of social media providers and online platforms in reducing the accessibility and proliferation of harmful content.</p> <p>16. NAHT cannot understate the importance of social media and other platforms expanding and improving the monitoring and moderating of external content hosted on their sites, to ensure that any harmful content is swiftly removed. Plan International’s researchers in 2024 found that 37% of girls and young women said they would like more controls over negative content towards girls and women on social media to help them feel safer . Half of girls aged 11-21 polled by Girlguiding UK (2024) want online platforms to remove harmful content to make them safer online .</p> <p>17. The majority of online platforms are designed around algorithms that reward engagement, no matter</p>

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	<p>whether this is positive or negative, and will ‘push’ content with higher levels of engagement out to further accounts. This is irrespective of the accuracy, legitimacy, or potential harm of the content. Further to this, content can be generated and disseminated by any user, including those with nefarious objectives, such as influencers seeking engagement and the proliferation of ‘bots’ specifically used to foster division.</p> <p>18. It is also important to consider the additional actions which may be required of social media and online providers to protect vulnerable young people, for example, those without strong family or friendship networks such as some looked after children, and those with additional needs who may fit age profiles but whose understanding and skills to navigate online communications and relationships are minimal. For such young people the risks of exposure to harmful and discriminatory content is even greater and moderation needs to be far more proactive to protect them from harm.</p> <p>19. Alongside the guidance and tools to help support users manage their online experiences proposed in these recommendations, NAHT believes that any platform that has children and young people amongst its user base must provide safety features tailored to them, along with clear rules and codes of conduct to ensure that everyone understands the accepted behaviour of users on the site. Ideally, these features would be similar in design and operate consistently across platforms to ensure that children and young people are easily able to identify and use such functions.</p> <p>20. For these reasons, NAHT is disappointed that the proposals outlined by Ofcom are recommendations only. We would welcome a strengthening of them to become a compulsory code of practice, underlining the collective responsibility of service providers to ensure the safety of the online environment for children and young people.</p>
<p>Question 4: Are there any other additional recommendations you think we</p>	<p>Confidential? – Y / N</p> <p>N/A</p>

Question	Your response
should consider? If so, please provide evidence to support your comment.	
Question 5: Do you have any examples or suggestions of ways of encouraging services to adopt these recommendations?	Confidential? – Y / N N/A
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.	Confidential? – Y / N N/A

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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