

<p>Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.</p>	<p>None</p>
<p>For confidential responses, can Ofcom publish a reference to the contents of your response?</p>	<p>N/A</p>

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>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? – N</p> <p>Ofcom says that the recommendations “are aimed at a broad range of entities that enable the creation, hosting, and distribution of content and media that reach significant UK audiences through broadcast, on-demand and online platforms, including social media and streaming services”, which are further set out in point 3.2. We acknowledge that ensuring all services delivering content to users, potentially via the same device, should engage with the recommendations. Given that this does not directly correlate with the categories of services and the duties set out in the OSA, there needs to be greater clarity about which OSA regulated services will be required to take up these recommendations and how they will be</p>

	<p>monitored; in effect, the extent to which these obligations form part of the measures required to satisfy services' safety duties under OSA. There is a concern that these services will not be required to take note of these recommendations, despite these service providers being responsible for large amounts of harm and the possibility for media literacy (especially by design) to form part of a harm mitigation strategy. A further question remains about AI chatbots, as the guidance says in point 3.2 that it should be taken up by chatbot providers, which is positive, however there is a lack of consistency with the legislation itself, which does not cover all AI chatbots.</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><i>Media literacy by design</i></p> <p>Whilst we welcome Ofcom's consideration of how design choices can be used to better inform users about staying safe, it is unclear how Ofcom differentiates a 'media literacy by design' approach to a 'safety by design approach', or what the relationship is between the media literacy guidance and safety by design provisions. For example, in Ofcom's recently published discussion paper on generative AI they suggest that "Media literacy could be improved through 'on-platform' interventions like 'readbefore-sharing' nudges, and 'off-platform' efforts including workshops and toolkits that build users' capacity to assess online content". However in their guidance on creating a safer internet for women and girls, nudges are referred to as "Design features which lead or encourage users to follow the designer's preferred paths in the user's decision making". It is therefore unclear whether features such as nudges fall into the 'media literacy by design' categorisation or the 'safety by design' approach. This is significant because media literacy is currently being treated as a separate statutory duty that Ofcom has through</p>

the OSA, whereas safety by design is seen as intrinsic to the Act's function; moreover, as noted above, it is not certain the extent to which media literacy nudges should be part of a preventative strategy aimed at satisfying OSA safety duties.

Ambition

Recommendation 2 refers to the need for tech providers to offer transparent information at key points in the service experience for their users in order to improve understanding about how platform features can be utilised for safety. However, despite recognising in point 4.12 that "people may unknowingly agree to settings that affect their privacy, data sharing, or content visibility, without fully understanding the consequences", Ofcom goes on to suggest in point 4.15 that this "could be done through, for example, their terms of service, by providing clear onboarding information". Ofcom's reference to terms of service here lacks the ambition needed to truly promote user understanding of the platform's safety measures as it runs counter to their own admission that users generally accept terms of service without fully understanding them or knowing what the consequences are for their privacy.

Furthermore, recommendation 2 says platforms should "equip people with practical tools to manage and personalise their online experience". Rather than providing critical skills to users about how to stay safe online, this recommendation reads more like a description of platforms' user empowerment duties, which Category 1 services will be required to implement through the Act. Once again, existing duties in the OSA are being packaged-up as media literacy, lacking proper ambition and straying from typical framings of media literacy as "the ability to access, analyse, evaluate and create messages across a variety of contexts", [as defined by Sonia Livingstone](#). Similar analysis can be applied to recommendations that platforms "set strong privacy and safety defaults for child accounts or profiles

creation and clearly present parental controls at sign-up and other opportune moments, helping families make informed, safe choices from the outset.”

Informed by experts

Ofcom’s three-year media literacy strategy outlines in point 1.4 that a central tenet of its approach to media literacy should be to focus “on groups disproportionately affected by harm, including women and girls, and help users understand and reduce exposure to mis and disinformation”. We welcome the inclusion in point 4.54 of a recommendation for platforms to be “conducting user testing with underrepresented groups” as well as the recommendation in point 4.56 for platforms to “form partnerships with third sector organisations, government bodies, Ofcom, and grassroots community groups, particularly those with strong connections to underserved communities, to co-design and deliver impactful media literacy interventions”. However given that the two recommendations in the “support media literacy of the underserved and diverse audiences” section are based on the need for co-design and partnerships, it is vital that Ofcom accompanies this with a recommendation that these efforts are properly resourced and remunerated. Whilst civil society groups and experts-by-experience are key to getting accessibility right, their contribution must be properly funded. The need for this input to be funded is addressed in relation to parent resources in point 4.38, which recommends that service providers engage with and support, through funding and collaboration, expert third parties that can provide tailored guidance to parents and caregivers”, however there needs to be consistency throughout the guidance.

Outcomes

It is unclear whether media literacy is aimed at helping users better understand the online

environment generally or how to navigate the specific platform a user is on. Media literacy should go beyond providing better information about the design of the particular platform users are operating to deliver clear information about how users can navigate the broader online community and ecosystem in a safe and critically engaged manner, as well as encouraging better user behaviour, considering pro-social design as part of a media literacy by design approach. In recommendation 2, Ofcom recommends that platforms “help users better understand why they are seeing certain content in their feeds, such as by explaining what recommender systems do and how people can influence them”. Media literacy here is purely about the design choices made by services, rather than an understanding of why certain pieces of content are harmful and encouraging critical thinking about content. We would therefore suggest that particular outcomes are attached to recommendations, along with a requirement for services to measure their media literacy design efforts as part of their overall harm mitigation strategy.

The interplay between Ofcom’s statutory media literacy functions and its role as the online safety regulator is a consideration in the Secretary of State’s [Statement of Strategic Priorities for Online Safety](#) (May 2025) which said that: “Media literacy can help tackle a wide variety of online safety issues for internet users of all ages. While precise definitions vary, the term refers to the broad range of skills and knowledge that internet users need to make safe and informed decisions online. This includes understanding that online actions have offline consequences, being able to engage critically with online information, and being able to contribute to a respectful online environment.” The SSP went on to say that: “Ofcom should continue to develop a clear framework for good platform design that aims to strengthen media literacy capabilities. This should consider where innovative approaches and features can support users to

	<p>make more informed decisions online. The government would like to see commitment to these best practice principles and demonstrations of leadership from online services in this matter.”</p> <p>We also fully support and endorse Internet Matters’ response to the media literacy consultation as experts on media literacy.</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>Confidential? – N</p> <p><i>Risk assessments</i></p> <p>As part of the recommendations for platforms to be clearer about their terms of service, and how users should navigate their platforms from the offset and throughout their time on the platform, Ofcom should recommend that platforms are transparent to users about the risks they have identified in their risk assessments so they have complete clarity about where a platform is failing to act on them.</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><i>Transparency powers</i></p> <p>It is important that media literacy provided to users is of a high quality and continuously updated to reflect the fast moving landscape of online harms, including how certain harms disproportionately impact marginalised groups. Ofcom’s transparency duties must be used to evaluate OSA regulated services’ adherence to the recommendations set out in their media literacy, both on the quality of the information provided to users, how effectively they communicate with their users about harm happening on their platforms and how to stay safe, as well as platforms adherence to the direct recommendations in the guidance. This evaluation should then be published so that civil society can see how Ofcom is tracking take up of the guidance,</p>

	<p>and users are aware of the quality of the information they are receiving from a platform.</p> <p><i>Join up with government</i></p> <p>There should be greater clarity about how Ofcom's media literacy guidance for tech platforms aligns with and complements the government's own strategic ambitions for media literacy. The Government has set out some of its plans around integrating digital skills and media-literacy development through the Digital Inclusion Action Plan, there will be updates to the curriculum in schools to include media literacy following the curriculum and assessment review, and other programmes such as Digital Inclusion Hubs. With so many strands of activity now in play, information provided by tech platforms should work in harmony with that provided by government interventions to ensure consistency and enable platforms to contribute meaningfully to a system-wide approach to improving media literacy.</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)

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