

## 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>Yes</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>No</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>The PSHE Association is the national body for personal, social, health and economic (PSHE) education. A charity and membership organisation, the Association works to improve PSHE education standards by supporting a national community of over 50,000 teachers and schools.</p> <p>The PSHE Association has a leading role in preventative education in England and a long track record of responding to new and emerging risks to children and young people. Wherever new risks arise, the Association considers whether preventative education can be part of the societal response.</p> <p>PSHE education is an established school curriculum subject in England, incorporating statutory content relating to relationships, sex and health education (RSHE) and content that is not currently statutory relating to economic wellbeing and careers education. PSHE lessons are a key location in the curriculum for teaching about media and digital literacy, particularly regarding online harms and the implications of digital technologies for relationships and sex.</p> <p>Our response to this consultation focuses on concerns about Recommendation 8. Whilst it is true that funding for civil society media literacy efforts is hard to find and short term, we are worried that encouraging technology platforms to provide this funding directly to charities and other organisations without any external guardrails comes with significant risks. Rather than supporting bet-</p>

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	<p>ter media literacy it could have the opposite effect, resulting in media literacy education which not only fails to provide the kind of critical skills and understanding needed to navigate our media and information landscape, but which actively undermines these skills.</p> <p>Our concerns are rooted in experience as one of our roles is to quality assure teaching resources used in PSHE education. We provide a <a href="#">Quality Mark</a> and have quality assured resources from government departments, charities and corporates across the breadth of the subject including topics such as food and nutrition, drugs and alcohol and gambling. Through this work we have developed a keen awareness of the risks associated with encouraging businesses to fund or directly develop educational resources.</p> <p>There are high quality PSHE education resources which have been funded, supported by or even published by corporates. This includes media literacy programmes from technology platforms. However, there is always a risk that the business incentives of corporates will be in direct conflict with the desired outcomes of preventative education and safeguarding. Ultimately, we believe that business should not be involved in deciding what consumers are taught about the risks and harms of their products.</p> <p>In the case of media literacy, the business models of technology platforms have been linked directly to harm. it is, for example, widely understood that most social media companies' business models are based largely on gathering vast amounts of personal data and using that data to target content and advertising. This creates a range of harms, such as the algorithmic amplification of hate; the exploitation of children and young people's deepest vulnerabilities (including those related to mental health, such as eating disorders) and financial exploitation. Understanding this is vital to critical engagement with the media and information landscape – yet it would seem extremely unlikely that tech companies fully illustrate their business models' contribution to such harms when creating or contributing to educational resources or approaches. As Gianfranco Polizzi has argued, to be effective, critical media literacy 'needs to incorporate political economy reflections on how advertising and</p>

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	<p>ownership, for instance, shape how online content is consumed and created - i.e. an understanding of the economic logic of the internet – how platforms work, how they make their money and how this incentivises particular design choices'<sup>1</sup> Yet it is hard to see how a company whose financing relies on gathering as much behavioural data as possible could be involved in producing education which might lead young people to question this practice.</p> <p>We are therefore concerned that Recommendation 8 could support technology companies to fund media literacy programmes which either avoid topics which are misaligned with their business models or even muddy the landscape by promoting narratives about technology which suits their interests, but perhaps not the interests of children.</p> <p>This is not an idle speculation as we know it has already happened in other industries. There is considerable evidence that 'unhealthy commodity industries', such as the tobacco and alcohol industries, have done exactly this, using 'youth education programmes and schools to disseminate discourses, ideas and values favourable to their positions, and to pre-empt regulation that threatens profits'<sup>2</sup>. We have also seen similar efforts from the fossil fuels industry, for example, a recent <a href="#">programme from Equinor</a>.</p> <p>The risk of Recommendation 8 is that this activity gets unintended support from Ofcom (thereby also providing a reputational risk to Ofcom) as companies promoting their own narratives through funded media literacy programmes could point to the recommendation and say they are in fact acting in line with best practice. This risk</p>

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	<p>is amplified with the rapid deployment of AI technologies. As we potentially move towards an <a href="#">attachment economy</a>, companies providing consumer AI products, such as Chatbots, will be at a significant advantage if they are able to frame the narrative about what these tools actually are. Current work on critical AI literacy, for example, is looking to challenge anthropomorphic framings of these tools, but is this in the interests of the technology companies providing them?</p> <p>None of this is to absolve technology platforms of financial responsibility for attempting to address the negative externalities of their business models, including through media literacy efforts. We believe that technology platforms could be part of the funding ecosystem for media literacy programmes – but only with appropriate guardrails and recognition of the power imbalance between funder and fundees.</p> <p>Whilst it was much criticised and imperfect, the GambleAware model of receiving donations from the gambling industry and then distributing those funds to gambling harm prevention and treatment programmes at least set up the potential for a governance framework which mitigates the above risks. We urge Ofcom to give careful consideration to the risks of this recommendation and consider how to, at the very least, highlight these risks alongside a clear warning against using funding of media literacy programmes to further corporate interests and a recognition of how hard it can be to identify when this is taking place.</p> <p>1 - van Schalkwyk MCI, Petticrew M, Maani N, Hawkins B, Bonell C, Katikireddi SV, et al. (2022) Distilling the curriculum: An analysis of alcohol industry-funded school-based youth education programmes. PLoS ONE 17(1): e0259560. <a href="https://doi.org/10.1371/journal.pone.0259560">https://doi.org/10.1371/journal.pone.0259560</a>).</p> <p>2 - Polizzi, Gianfranco (2019) Information literacy in the digital age: why critical digital literacy matters for democracy. In: Goldstein, Stéphane, (ed.) Informed societies: why information literacy matters for citizenship, participation and democracy. Facet Publishing, London, UK, pp. 1-23. ISBN 9781783304226</p>

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<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? – Y / N</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 / N</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? – Y / 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)

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