

Consultation response form

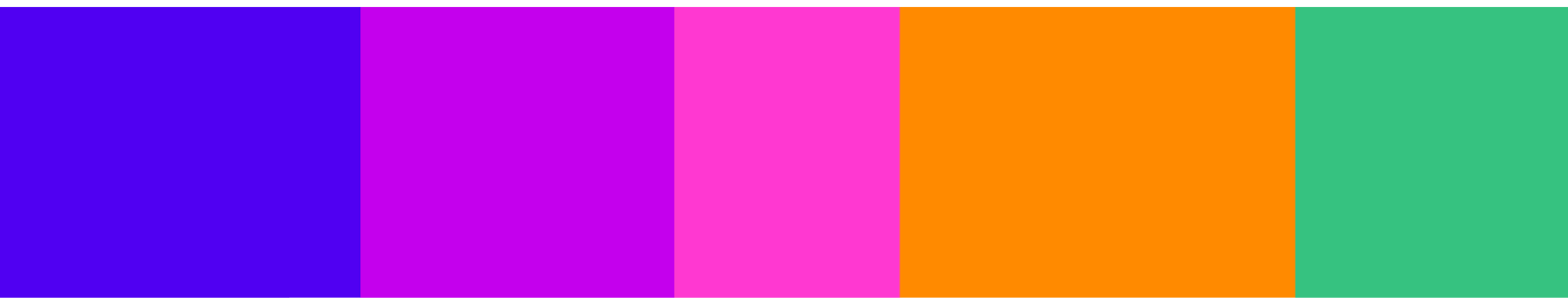
Please complete this form in full and return to MSOM_SoR_Consultation@ofcom.org.uk.

Consultation title	How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services
Full name	Mali Williams
Contact phone number	
Representing (delete as appropriate)	Organisation
Organisation name	S4C
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? – N</p> <p>Overall, it is clear that the proposed recommendations are intended to apply to a broad range of platforms that facilitate the creation, hosting and distribution of content and media.</p> <p>It is made clear (3.2.b) that, as a PSB, S4C’s VoD service would fall within scope, as would our other online services beyond broadcasting and streaming (3.2.d), such as our news service website and app.</p> <p>However, we would suggest that Ofcom provide clarification on what it considers “<i>significant</i> UK audiences” (3.1) to mean. Such clarification would ensure consistent interpretation and support the proportional application of the recommendations.</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>We agree with Ofcom that its recommendations should be proportionate to the size and nature of organisations. In this context, further clarification by Ofcom of what it considers constitutes “<i>significant</i> UK audiences” (3.1) would again be helpful, as this would provide consistent interpretation and proportional application of the recommendations across organisations of different scales.</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>Recommendation 1 – S4C supports the principle of embedding media literacy by design. We already prioritise age-appropriate design for children, including safety and simplicity. Any formal media literacy by design policy would be based on these existing approaches, ensuring that our services continue to evolve to meet audiences’ needs whilst reflecting our public service remit.</p> <p>Recommendation 2 – S4C retains a high degree of control over editorial curation of content on our VoD service. Our Welsh-language content is carefully selected</p>

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	<p>and presented, and we aim to provide users with clear information about the types of content available.</p> <p>Recommendation 3 – Whilst we support clear and accessible design for our services, S4C has no plans to implement time-management tools on our VoD service. Our Welsh-language content represents a unique public service resource – often the only use of Welsh for many children outside of the classroom. We consider that maintaining easy access to this content aligns with our public service mission whilst ensuring a safe and user-friendly experience.</p> <p>Recommendation 4 – S4C supports the principle of helping audiences to critically assess content. While tools such as AI labels are more relevant to large online platforms, S4C contributes through trusted news, children’s content and educational resources in Welsh, helping audiences develop the skills and confidence to understand and interpret content.</p> <p>Recommendation 5 – S4C supports the principle of empowering parents and caregivers. Our VoD service S4C Clic allows for the creation of child accounts, with parental control and a walled garden for age-appropriate content. These measures help ensure that younger users can engage with content safely and meaningfully.</p> <p>Recommendation 6 – While this recommendation is primarily directed at online platforms, we would note that any signposting activity undertaken by S4C would prioritise Welsh-language resources to ensure relevance and accessibility for our audiences. These resources are available via S4C’s website.</p> <p>Recommendation 7 – S4C supports this recommendation and notes that we already provide and promote programming and educational content that helps audiences understand, interpret and assess the credibility of information. Through our news services – broadcast and digital, children’s content such as Newyddion Ni (Our News) and Ne-Wff-ion, and educational resources, we contribute to developing critical media skills among our audiences. As the Welsh-language PSB, this role is particularly important in ensuring that Welsh-speaking audiences, including children and young people, have access</p>

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	<p>to trusted and culturally relevant content that supports their media literacy.</p> <p>Recommendation 8 – S4C recognises the importance of sustained investment in media literacy skills development. We already invest in a range of educational and skills-building initiatives, through our Welsh-language content, learning resources and partnerships with organisations. We consider that this activity aligns with the intent of the recommendation and we will continue to ensure that our work supports the development of media literacy skills among our audiences.</p> <p>Recommendation 9 – S4C supports the focus on inclusive design and partnerships to support the media literacy of underserved audiences. As the Welsh-language PSB, we would note the importance of ensuring that media literacy initiatives reflect the needs of Welsh-speaking audiences, including children. We consider that collaboration with S4C, platforms and relevant organisations in Wales could help ensure interventions are linguistically appropriate for Welsh-speaking users.</p> <p>Recommendation 10 - If Ofcom agrees, S4C would consider using our new Statement of Programme Policy (SOPP) as a mechanism for publishing an annual statement on our VoD design choices and media literacy activities. This would avoid unnecessary duplication and ensure that our reporting is aligned and accessible. As the SOPP is published annually, it would provide an appropriate and transparent means of meeting this recommendation.</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>There is substantial evidence that PSBs, including S4C, play a key role in supporting media literacy through trusted news, educational programming and culturally relevant content, such as Welsh-language content. In light of this, Ofcom could consider a recommendation encouraging third-party online platforms to upweight or give greater prominence to PSB content. Improving the discoverability of such content would help ensure that users, including children and underserved groups, can</p>

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	more easily access high-quality information that directly supports media literacy outcomes.
<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>We consider that highlighting best practice examples, including from PSBs and Welsh-language services, would help demonstrate how educational, news and culturally relevant content can effectively support media literacy.</p> <p>Ofcom could encourage third-party platforms to give greater prominence to public service content so that trusted and educational content is more easily discoverable by users. This could be reinforced by setting clear guidance on discoverability, sharing case studies of effective approaches, offering recognition for platforms that implement good practice, and facilitating greater collaboration between S4C and platforms such as YouTube and social media services.</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>Confidential? – N</p> <p>As the primary Welsh-language public service content provider, S4C plays a key role in delivering trusted news, educational, and culturally relevant content in Welsh, which supports media literacy outcomes for Welsh-speaking audiences. We would encourage Ofcom to also consider how giving Welsh-language content appropriate prominence on online platforms could further enhance these outcomes, as well as improve opportunities for people to use the Welsh language.</p>

Please tell us how you came across about this consultation.

- Email from Ofcom
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- 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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