



Consultation response form

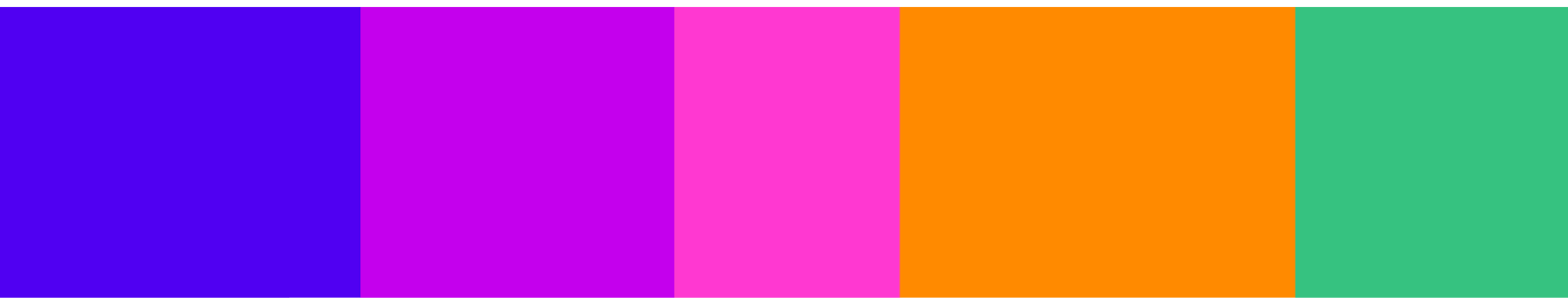
Please complete this form in full and return to [MSOM SoR Consultation@ofcom.org.uk](mailto:MSOM_SoR_Consultation@ofcom.org.uk).

Consultation title	How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services
Full name	Amelia Fairney
Contact phone number	
Representing (delete as appropriate)	Organisation
Organisation name	Shout Out UK
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>No</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>No</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>Shout Out UK (SOUK) broadly supports any comprehensive set of recommendations aimed at strengthening media literacy across the UK. However, based on our decade of experience delivering education and our recent partnership with Ofcom, we believe that any strategy must move beyond one-off interventions and focus on systemic change and sustained, multi-year funding.</p> <p>Platform Cooperation</p> <p>Applicability is vital, but a funding model is missing. The recommendation for collaboration is key to reaching young people where they spend their time. Our DISMISS campaign, in partnership with Ofcom and supported by platforms like X, reached over 6 million individuals, achieving 13.5 million impressions. This evidences the effectiveness of strategic platform cooperation, but the current model relies on ad hoc agreements. Services must be given a mandate or incentive to provide sustained, rather than token, support.</p> <p>Risks of the Current Approach</p> <p>The primary risk is perpetuating the current fractured, underfunded, and ad-hoc model. If recommendations remain non-statutory and are not backed by long-term funding commitments:</p>

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	<p>Inconsistent Access: Media literacy will remain a post-code lottery, failing to provide equitable access to all regardless of their socio-economic background.</p> <p>Vulnerability to Disinformation: Without sustained, repeated engagement, citizens will lack the long-term emotional resilience necessary to counter the rapidly evolving threat of AI-generated content and deepfakes.</p> <p>Wasted Investment: Short-term, one-off funding cycles prevent the achievement of long-term learning outcomes.</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>We urge Ofcom to consider the following systemic recommendations to create a cohesive and effective national media literacy framework:</p> <p>Establish a Technology Levy to Fund Programmes:</p> <p>Recommendation: The government should amend the Online Safety Act (OSA) to include a statutory levy on large technology companies to provide sustained, multi-year funding for national media literacy programmes and research.</p> <p>Evidence: Tech platforms are the biggest offenders in spreading mis- and disinformation and profit immensely from the digital ecosystem they have created. They must be held responsible to finance the necessary interventions. This steady, multi-year funding is essential to achieve long-term learning and retention, which one-off government grants cannot deliver.</p> <p>Focus Research on Algorithmic Bias and Closed Channels:</p> <p>Recommendation: Ofcom should prioritize and fund research that investigates the spread of information, and subsequent harm, within closed messaging apps and the effect of algorithmic amplification and personalization on radicalization and polarization.</p> <p>Evidence: The digital media environment is becoming increasingly fractured, with people retreating into online echo chambers. Media literacy must evolve to address</p>

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	<p>the "increasing personalisation (and polarisation) of content" and the rise of AI-generated deepfakes, which evade traditional detection systems.</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>Regulatory Incentives</p> <p>Link Compliance to Financial Penalties/Ofcom Reporting. The best way to encourage adoption is to link it to the OSA's enforcement structure. Services failing to demonstrate adequate media literacy provisions (e.g., in their transparency reporting or risk assessments) should face tougher scrutiny from Ofcom, backed by the threat of significant fines (up to 10% of revenue).</p> <p>Procurement Mandates</p> <p>Mandate Media Literacy for Public Sector Contracts. Government bodies and the public sector (including the NHS, Police, and local government) that purchase or contract software services should mandate that the vendors demonstrate clear commitment to media literacy principles and digital responsibility within their platforms. This creates a market incentive for compliance.</p> <p>Partnership Model (SOUK Model)</p> <p>Co-Creation and Amplification: Demonstrate the value of campaigns through public success. Our DISMISS campaign with Ofcom showed platforms like X that partnering with expert-led civil society organizations provides massive reach (over 9 million individuals) and enhances their corporate image by visibly taking action on misinformation, which is a powerful incentive for other platforms to replicate.</p> <p>Transparency & Disclosure</p> <p>Mandate Public Disclosure of Media Literacy Investment: Require large platforms to publish detailed, independently audited reports outlining their annual investment (in time and money) in media literacy initiatives outside of their platform (e.g., funding external providers like SOUK). Public shaming or praising based on this metric can influence corporate behaviour.</p>

Question	Your response
<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? –</p> <p>No</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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