

# Consultation response form

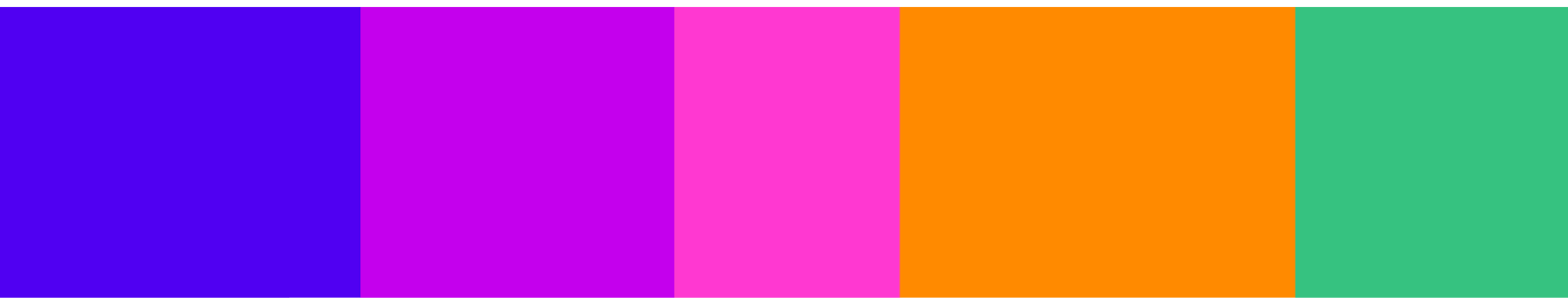
Please complete this form in full and return to [MSOM SoR Consultation@ofcom.org.uk](mailto:MSOM_SoR_Consultation@ofcom.org.uk).

<b>Consultation title</b>	How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services
<b>Full name</b>	Dr Jan Breitsohl
<b>Contact phone number</b>	
<b>Representing (delete as appropriate)</b>	Organisation
<b>Organisation name</b>	University of Glasgow
<b>Email address</b>	

## 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](#).

<b>Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.</b>	Nothing
<b>Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.</b>	None
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	Yes



## 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>Confidential? – N</p> <p>The recommendations are clear but overlook large-scale organisational communities—brands, media outlets, charities, and NGOs that host millions of adults. These spaces frequently contain harmful-but-legal content and currently lack tailored guidance.</p> <p>Evidence from my work shows that brands’ moral or social-value posts often incite hostility, particularly when silence follows user conflict. Including such adult contexts would align the strategy with real-world risk patterns.</p> <p>Recommendation: expand scope beyond platforms and children to adult organisational communities where literacy can be taught through visible, proportionate engagement.</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>Confidential? – N</p> <p>They are proportionate for platforms but less so for organisations that already host communities yet avoid moderation. Many large brands and NGOs have content teams but leave conflicts unmanaged. My experiments demonstrate that active, legitimacy-based responses are practical, low-cost, and consistently outperform deletion or silence.</p> <p>Ofcom should encourage these organisations to treat such responses as part of their corporate social responsibility, not as reputational risk.</p> <p>Recommendation: include practical examples for organisational pages and brand communities, illustrating how proportionate responses promote literacy through action.</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>Confidential? – N</p> <p>Effectiveness depends on embedding literacy in interaction design. Users learn from what they see: when organisations moderate visibly and fairly, bystanders become upstanders.</p> <p>Across experiments, transparent explanations increased empathy and willingness to intervene. Conversely, covert</p>

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	<p>deletion or moralising posts without follow-up reinforced polarisation. Identification with brands and materialism drive social comparison and bullying, so literacy guidance should also address how value-laden communications amplify conflict.</p> <p>Recommendation: recognise moderation visibility and value framing as mechanisms that teach literacy in practice.</p>
<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? – N</p> <p>Evaluation should move from engagement metrics to causal testing. Randomised trials of moderation designs and explanation cues in adult communities can isolate what genuinely improves understanding and well-being.</p> <p>My Online Hate Response Evaluation Framework already applies this sequence—diagnosis → experimental testing → field validation → AI monitoring—to measure behavioural and emotional change.</p> <p>Recommendation: collaborate with academic partners to standardise causal-evaluation methods and include adult community environments, since these shape the behaviours, children later emulate.</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? – N</p> <p>Organisations act when evidence shows benefits for trust and reputation. Ofcom can reinforce this through recognition schemes or public reporting on literacy-by-design adoption, plus cross-sector pilot projects using proportionate-response playbooks.</p> <p>Such pilots (ie. spanning news, retail, sport, and charity sectors) could test upstander prompts and visible moderation under Ofcom’s Researcher Access Framework.</p> <p>Recommendation: incentivise active engagement over silence by highlighting proportional responders as good-practice exemplars.</p>
<p><b>Question 6:</b> Do you have any comments on our impact assessment, rights assessment, equality impact as-</p>	<p>Confidential? – N</p> <p>/</p>

Question	Your response
assessment and Welsh language assessment? Please provide evidence in support your answer.	

**Please tell us how you came across about this consultation.**

- Email from Ofcom
- Saw it on social media
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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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