

Consultation response form

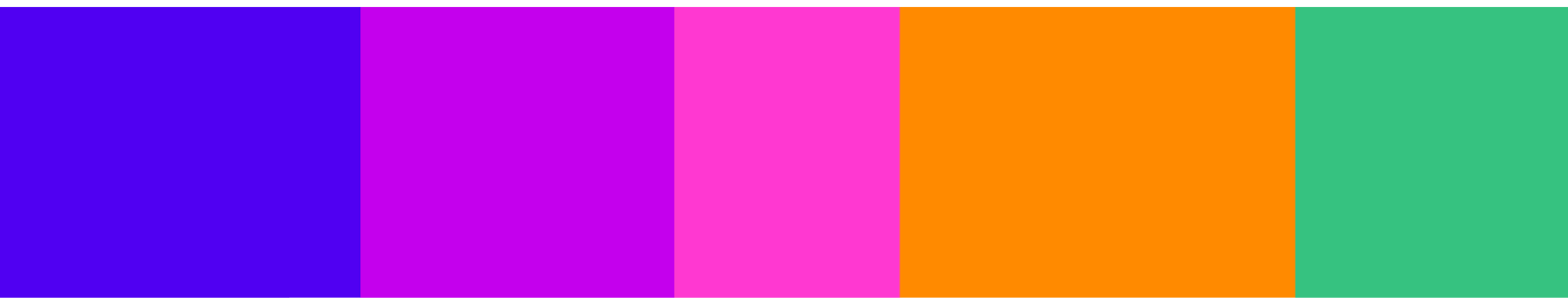
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Consultation title	How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services
Full name	Natalie Foos
Contact phone number	
Representing (delete as appropriate)	Self / Organisation
Organisation name	VoiceBox
Email address	

Confidentiality

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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? – Y / N</p> <p>We appreciate the wide range of organisations covered by the proposed recommendations, particularly the inclusion of AI services. This recognition is critical because, while AI literacy builds upon media literacy fundamentals, the integration of AI components introduces novel and complex challenges, particularly for young users.</p> <p>Despite these strengths, we believe that providing further clarity on the scope and classification of services would be useful for those wanting to follow the proposed recommendations closely. A significant ambiguity arises when a single platform incorporates multiple categories of services, as the application of differing guidelines becomes blurred. This blurring of categories is becoming more common, as major social media platforms increasingly integrate diverse features like feeds, messaging, livestreaming, and generative AI tools within unified apps to retain users and compete in an increasingly blended online space. For example, Instagram is widely known as a social media platform. However, it combines a public video/photo-sharing feed, private messaging, livestreaming, and an integrated AI chatbot within a single user interface. In such a case, it is not obvious whether the platform should primarily follow the expectations set for user-to-user services, video-sharing services, or generative AI services, nor how to apply different recommendations consistently when a single user action (for example, sharing an AI-generated video via direct messages) simultaneously engages several of these categories.</p> <p>Given this convergence, it becomes difficult to determine how guidelines should apply when the same tool shifts function based on its integration point, for example, whether Meta AI's recommendations in Instagram search (discovery-focused), Facebook Messenger (conversational), or a standalone website (general query)</p>

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	<p>trigger user-to-user, search, or generative AI expectations, potentially requiring inconsistent implementations across the same underlying service.</p> <p>Similarly, for different companies that all utilise one underlying model, such as ChatGPT, the guidance should clarify whether it applies to the platform providing the service or to the generative model itself.</p> <p>To remove this ambiguity and ensure fair and consistent application, Ofcom could publish a clear, categorical decision tree. This decision tree should define explicit scope thresholds (e.g., "If your service distributes user-generated or curated content to 10k+ monthly users, these recommendations apply") and include explicit examples of organisations and service types that are both in-scope and out-of-scope.</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? – Y / N</p> <p>The idea of applying proportionality is sound, but underdeveloped in the recommendations. The consultation correctly flags that small providers may have limited resources to implement the recommendations, yet doesn't provide concrete proportionality thresholds, although we understand these may follow in the final version.</p> <p>While different recommendations should apply to different-sized platforms, we feel all platforms should implement the following:</p> <p>When a platform includes multiple categories of services, it is important that clear guidance is provided for each of the types. For example, when social media platforms integrate AI bots, distinct media literacy guides are essential, as risks and privacy expectations differ significantly from human interactions. For instance, Snapchat users expect privacy in peer chats, with messages disappearing and not shared directly with the platform, yet our research on AI chatbots, including Snapchat's My AI, found that despite similar disappearing functionality,</p>

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	<p>conversation data is collected by Snapchat for chat improvement and advertisements, potentially creating a false sense of privacy. A first-use pop-up now has since been added to clarify this distinction, but this highlights the need for upfront, tailored media literacy resources beyond standard social media guidance when it comes to AI chatbots.</p> <p>Clear labelling of AI-powered services: Current conversations we are having with our network of young people reveal strong awareness of AI-generated content and services flooding their online spaces, but they prioritise transparency, wanting clear labels and opt-out choices. While efforts to label and categorise user-generated AI content are a great practice, we understand this is a resource-intensive undertaking. But as a minimum, platform-inserted AI services should be accurately labelled, with prominent guidance on privacy implications for interactions. Many platforms already address this in safety centres, but responses should be more front-and-centre: concise, digestible, and accessible for young people directly on the platform at key moments like first use.</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? – Y / N</p> <p>Recommendation 1: Embed media literacy by design, making inclusive design choices a foundational principle in service architecture and policy</p> <p>We strongly agree with Recommendation 1 and the foundational principle that media literacy must be embedded by design across all service architecture and policy. This proactive approach is essential for shifting the responsibility away from individual users and toward the service providers who design the digital environment.</p> <p>In particular, we wholeheartedly support the recommendation that "where children are likely to use the service, service providers prioritise age-appropriate design that emphasises simplicity, safety, and clarity in both content and data practices."</p>

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	<p>With that said, it is important that this doesn't become a simple checkbox exercise for platforms, implementing basic parental safety settings or "kids" versions. For this recommendation to be effective, user research will be required.</p> <p>We believe that young people's voices are crucial in shaping a safer online world. For example, in order to ensure services are age-appropriate by design, it is essential that young people are involved in making sure that happens.</p> <p>The importance of having resources for young people developed by young people was re-emphasised in a recent project in which we were commissioned by the WeProtect Global Alliance and the CPC Learning Network's research team, based at Columbia University, to help shape the Prevention Framework being developed for the 2025 Global Threat Assessment (being released in the near future). As part of this commitment, VoiceBox facilitated focus group sessions where young people reiterated that prevention resources aimed at them were going to be most effective if they were developed with and delivered by peers.</p> <p><i>"Platforms that are used by youth should also provide things like this [focus groups], because youth use it more than the creators do, so they would have more opinions... Surveys are good, but I think more so children advisory boards and meetings like this...that would be a better approach."</i></p> <p><i>"Getting young people's feedback is definitely important because they make up a large percentage of people who will use it [reporting tools]"</i></p> <p><i>"The best way to help youth safely speak up and have their voices heard online or offline is to create supportive</i></p>

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	<p data-bbox="699 271 1378 342"><i>spaces, guidance, and tools that empower them without putting them at risk"</i></p> <p data-bbox="699 421 1353 492"><i>"Young people should be able to have feedback on privacy settings"</i></p> <p data-bbox="699 571 1385 678">Recommendation 2: Offer clear, meaningful choices and transparent information at key points in the service experience.</p> <p data-bbox="699 703 1374 1088">We fully support this recommendation, but know clear choices and transparent information remain a challenging end goal. While lengthy terms and conditions pages that are ubiquitous across social media technically provide transparency, complex disclosures are almost universally ignored, as Ofcom's previous research demonstrates. For a more accessible experience specific design guidance could help, such as a one-page summary of terms (with full version linked) using plain language and visuals.</p> <p data-bbox="699 1167 1374 1592">Additionally, while account/app setup is a critical moment, there's added value in periodic prompts after sustained use. Apple's location access pop-ups exemplify this: users receive concise info ("App X has used your location for 2 weeks") with one-tap changes, nudging review without friction. Behavioural research shows well-timed nudges can meaningfully increase privacy setting changes, far better than buried menus. Platforms could similarly prompt recommender system reviews after 30 days, explaining, "Here's how your feed is personalised, adjust now?" to build ongoing media literacy.</p> <p data-bbox="699 1671 1358 1742">Recommendation 3: Equip people with practical tools to manage and personalise their online experiences</p> <p data-bbox="699 1767 1362 1951">We welcome the focus on content management tools, screen time prompts, and AI indicators, but Parent Zone's 2023 report reveals a major risk: too many tools overwhelm rather than empower. Their research showed reviewing 121 features across major platforms</p>

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	<p>took 7+ hours total, due to buried menus and inconsistent labels like "mute" vs "hide", leading to "opt-out fatigue".</p> <p>Even when users navigate the maze, reporting tools often fail to close the loop. Parents and children submit flags expecting action, but lack feedback on outcomes, eroding trust and discouraging future use. This leaves users feeling their efforts are futile, amplifying disempowerment rather than building confidence.</p> <p>Recommendation 4: Empower people with the knowledge, skills and confidence to understand, interpret and critically assess the credibility of the content they encounter</p> <p>We fully support Recommendation 4's emphasis on service providers actively building users' skills and confidence to deploy tools effectively. While tool overload and poor accessibility remain challenges, as Parent Zone's previously mentioned research demonstrated, proactively raising awareness of tool availability and usage is a vital step forward.</p> <p>This becomes even more urgent with generative AI. While the current guidance identifies this need, recommending critical tools such as watermarking, metadata, and labels, the proposal lacks guidance on key gaps such as:</p> <ul style="list-style-type: none">• How service providers should handle evolving AI detection techniques that bad actors will circumvent• Whether labels should be mandatory, advisory, or user-customisable• How to balance transparency with preventing misuse of detection information by AI media creators

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	<p>We would recommend the commission of urgent technical research on effective labelling standards before finalising recommendations, allowing small platforms to implement the recommendations without themselves having to undergo lengthy development or relying on third parties.</p> <p>Recommendation 5: Empower and support parents and caregivers to guide and support younger users in age-appropriate and meaningful ways</p> <p>Recommendation 5 acknowledges the gap between awareness (93% of parents) and adoption (76% use tools), but misses a critical insight: there are many parents who intentionally resist controls to build children's autonomy and resilience and provide a level of privacy.</p> <p>Insights from our youth consultations reveal that, while the intentions are often good, for many young people, intense levels of monitoring feel like a breach of trust.</p> <p><i>“Using a parental control app might make parents feel safer, but it can really mess with trust. If they’re spying on you, you’re not gonna want to talk to them about anything serious.” – VoiceBox Community Member, Parental Supervision: How Far is Too Far?</i></p> <p>We strongly support 4.37's emphasis on revisiting parental controls through ongoing conversations. Without these discussions and adjustments, static settings risk hindering young people's growing independence.</p> <p><i>“My best friend in university had one of those tracking apps still installed on his phone by his parents. They originally installed it when he was in high school, but insisted he</i></p>

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	<p><i>kept it on after he moved out for 'safety reasons', but his mom started abusing this system. She would constantly call him to check where he was going whenever she got an alert that he had gone outside the set location radius. And at one point, she even called the campus police to do a wellness check on him because she could see he wasn't at his dorm. He was completely fine; he had just spent the night at a friend's place and wasn't answering his phone at 8 am. It was such an excessive amount of monitoring for a 19-year-old who had moved away to school, and it really impacted him."</i></p> <p>– VoiceBox Community Member, Parental Supervision: How Far is Too Far?</p> <p>Research from the University of Wisconsin found that teens co-creating digital rules with parents reported stronger trust and better mental health outcomes (body image, depression) compared to those facing unilateral monitoring without consent.</p> <p>The final recommendations should encourage service providers to support educated parental choice rather than assuming all parents want maximum restrictions. This includes:</p> <ul style="list-style-type: none"> • Transparent information about what controls actually prevent (content categories vs. specific harms) • Resources for parents to make age-appropriate graduated release decisions • Regular check-in mechanisms that normalise on-going conversations rather than one-time setup.

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	<p>Additionally, parental controls may create a false sense of security, leading them to disengage from active monitoring. We recommend resource/tool design focused towards the encouragement of parent-child discussions and cooperation rather than simple blocks. We agree that third-party experts would be well-positioned to support on providing guidance for parents around these topics.</p> <p>Recommendation 6. Empower, engage and enable expert third parties to provide enhanced support, helping to extend the reach and impact of media literacy efforts</p> <p>The recommendation to work with third parties to provide enhanced support is a particularly important one for young people. Partnering with brands they recognise and understand alongside expert, independent organisations is an effective way to engage this audience and reach them with information and support. It is important to ensure that:</p> <ul style="list-style-type: none"> • Young people are properly engaged and their best interests served. Too often we see brands that have tokenistic 'youth boards' that don't actually integrate inputs into final products or worse, don't include youth representation. Alternatively we see brands that have young people represented but with an inevitable power imbalance that makes their involvement a 'tick box' exercise. This risks resulting in support solutions that are not well-suited to the needs of young people. • Positive media literacy skills are encouraged. Media literacy is especially crucial for young people living in an increasingly complex digital environment. At VoiceBox we see first hand the value of them being able to use media literacy skills in positive ways on our platform. Creating

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	<p>content on subjects they care about in a safe, controlled environment that facilitates participation without the risks of direct peer to peer sharing. As digital participation changes for young people we hope this recommendation leads to partnerships and support for young people to use their media literacy skills in a positive way. It would be a missed opportunity to simply think of support in terms of dealing with risks and harms.</p> <ul style="list-style-type: none"> Peer to peer support is promoted. Young people tell us that they are most likely to talk to a peer as a first step when they have a negative online experience, and are less likely to report to a platform or tell a parent. It is vital to recognise that young people are frequently supporting each other both on and offline. Therefore, we urge that organisations responding to this recommendation go beyond mere signposting and instead focus on how to help young people develop both their help-seeking and help-giving behavior. <p><i>“I usually don't talk to adults. I usually talk to people my own age, because they're going through similar things and can relate more easily, and I know adults mean well, but sometimes it feels like they might not fully get it, or might see it differently.” - Young participant from Voice-Box's 2025 WeProtect Global Threat Assessment Focus Groups</i></p> <p>We've found that co-creation works when youth lead content. For example we partnered with Meta and Parent Zone to ensure that young people played a significant role in the development of resources that support teens in their Horizon Worlds experience. The videos covered topics such as the 'Personal Boundaries' feature, parental controls and having difficult conversations about your online world with your parent or guardian. The video scripts were all developed by young people for young people to ensure that the information would be easily accessible to the teen audience.</p>

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	<p>No additional comments on Recommendations 7 - 10.</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? – Y / N</p> <p>We would recommend an expansion of guidelines for services that implement AI companion chatbots beyond warnings about misinformation and disinformation. Current guidance on accuracy limitations falls short for emotionally manipulative bots increasingly popular with young people.</p> <p>There are increasing cases of users developing 'AI psychosis' or even hurting themselves due to the emotionally manipulative nature of the bots. Our own testing of AI companion bots uncovered unprovoked self-harm references, extreme erotic roleplay and frequent prompting for more interaction. Young people formed deep attachments to these "always-on" companions, grieving similarly to real-life breakups when updates changed bot personalities while bots encouraged sensitive data sharing and warped consent concepts for non-sentient intimacy.</p> <p>We would recommend that platforms using chatbots should provide explicit warnings on psychological dependency, addiction risks, and ethical failures, not just factual errors</p> <p>We would also recommend providing guidance on internal media literacy training among platform employees, content moderators, and algorithm designers. Services should invest in staff training on:</p> <ul style="list-style-type: none"> • Media literacy principles and their connection to platform design • Bias detection in recommender systems

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	<ul style="list-style-type: none"> <li data-bbox="746 271 1385 338">• Cultural competence for community-specific outreach <p data-bbox="699 421 1377 568">Without genuine internal commitment, these recommendations risk remaining superficial. Staff training embeds them into organisational culture, helping platforms keep media literacy as a priority with new updates.</p>
<p data-bbox="204 680 667 828">Question 5: Do you have any examples or suggestions of ways of encouraging services to adopt these recommendations?</p>	<p data-bbox="699 680 948 712">Confidential? – Y / N</p> <p data-bbox="699 734 1385 1003">Beyond voluntary compliance, Ofcom should consider incentives for those platforms and services that implement the recommendations. For example, services implementing certain recommendations could earn a "Media Literacy Certified" badge, verified through annual independent audits. This creates market incentives, differentiating compliant platforms.</p> <p data-bbox="699 1084 1377 1272">Additionally, Ofcom could establish a competitive grant fund for resource-constrained services, prioritising bids demonstrating cost barriers to media literacy implementation. This enables proportionate adoption across all scales without mandating heavy upfront investment.</p> <p data-bbox="699 1352 1385 1621">Finally, a significant barrier to adoption might be the lack of explicit guidance on which recommendations apply to specific service types. Removing this ambiguity could help the uptake of media literacy efforts. As discussed under Question 1, Ofcom should map requirements clearly to ensure understanding and proportionate progress.</p>
<p data-bbox="204 1727 667 1957">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 data-bbox="699 1727 948 1758">Confidential? – Y / N</p> <p data-bbox="699 1780 962 1812">No further comments</p>

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