

Your response

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<p>Question 1: Do you agree with our proposals in this section? Please explain your reasons and provide any relevant supporting evidence.</p>	<p>Confidential? – N</p> <p>We welcome your prioritisation of research, evidence and evaluation as part of the media literacy strategy.</p> <p>Goal 1 – We agree that assessing changes in media literacy over time using core measures will be crucial and think this should be met with understanding changes in the media and tech industry that might be contributing or impacting on any changes seen. However, it is unclear how changes in media literacy will be assessed and whether this will be reliant on self-report measures which may be limited. Studies accessing behavioural change over time would add great value.</p> <p>Goal 2 – We agree with the importance of amplifying the voices of a range of groups within society. Given the risks around self-harm and suicide content, it is crucial that people with lived experience and subject matter organisations are consulted to inform the research. Through our Online Excellence Programme at Samaritans, we have panels of people with lived experience of self-harm and suicide that would welcome the opportunity to inform your approach.</p> <p>Goal 3 – We believe that providing tools and guidance to better equip organisations will be critical but it is unclear whether you are just planning on doing this specifically around mis and disinformation which would exclude many critical topics. You also say these will be aimed at organisations – this should include online services too. It is essential that industry and third sector organisations come together on this important topic. Knowledge of successes, as well as issues, should be shared across sectors.</p>

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	<p>Goal 4 – We are very supportive of Ofcom supporting providers of media literacy to carry out evaluations to promote a culture where best practice is developed and shared. The strategy does not outline how Ofcom plans to encourage online services to share their evaluation findings and learnings externally when this is something that is not happening in practice already. We would like to see greater transparency from Ofcom, as well as efforts to encourage this evaluation work from services.</p>
<p>Question 2: Do you agree with our proposals in this section for working with platforms? Please explain your reasons and provide any relevant supporting evidence</p>	<p>Confidential? – N</p> <p>Outcome: It is unclear from your description what is meant by ‘online services’ and who would be in scope. There are lots of different types of online services, so it will be important that we consider the full range of these, including user-to-user, static websites, media sites etc. It is also unclear how you will measure whether ‘better media literacy’ has been achieved.</p> <p>Goal 1 – We welcome the sharing of learnings and best practice principles but would like to highlight areas to consider:</p> <ul style="list-style-type: none"> - Best practice may look different for different types of services, depending on key factors such as their functionality and audience (e.g. age, current level of distress). It is important to encourage platforms to reflect on this and try to understand how they can incorporate the principles most effectively for their community. It is also essential that platforms are strongly encouraged to user test their interventions with their target audience most likely to be affected, rather than relying on following best practice principles. - Technology and media evolve at a significant pace, and we need to be agile and innovative if we are to effectively educate people around media literacy and online safety. As such, whilst sharing learnings, research evidence and best practice principles should be strongly promoted

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	<p>and encouraged, this should not deter companies from using creative and innovative solutions to safely trial novel approaches.</p> <p>Furthermore, whilst encouraging the development of best practice, it is not clear who this is aimed at. For example, is this just in relation to educating users or is there a direct ask of online services and organisations to do the same for other those around users, such as parents and carers. Emphasis must also focus on learning from what didn't work, so that effective best practice can be created.</p>
<p>Question 3: Do you agree with our proposals in this section? Please explain your reasons and provide any relevant supporting evidence. We are particularly interested in any views and evidence about whether a Media Literacy Week would be impactful.</p>	<p>Confidential? – N</p> <p>We acknowledge that media literacy interventions are most effective when they are informed by people with lived experience and shared by trusted voices, which may include peers or individuals alongside organisations.</p> <p>It is therefore essential that trusted voices are provided with adequate funding to develop, implement and evaluate interventions effectively. It is also essential that the work is influenced by people with lived experience of online harms, including those with lived experience of harms relating to self-harm and suicide. Whilst we appreciate the acknowledgement that this requires a substantial resource investment, we believe it is essential and that organisations and online services should prioritise this in order to create meaningful interventions that work.</p> <p>We agree that people with mental health difficulties are a vulnerable group who need additional support with media literacy but disagree that this only applies to children and would encourage all ages to be prioritised within this strategy. Our research shows that 83% of people agree that harmful suicide and self-harm content can have a damaging effect on adults, not just children.¹</p> <p>Harmful content is listed as a priority area and it is essential that this includes harmful content relating to self-harm and suicide. As well as how to navigate harmful mechanisms that push dangerous self-harm and suicide content towards users e.g. via site algorithms.</p>

¹ <https://www.samaritans.org/news/government-is-failing-the-public-with-online-safety-bill-says-samaritans/>

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	<p>Goal 2 – we support the focus on training key audiences such as mental health professionals and education professionals. Samaritans have recently launched a suite of free training resources (online guidance, e-learning modules and training webinars) for practitioners on talking to people experiencing self-harm and suicide about their online use. This includes key guidance on educating practitioners on how people are using online spaces, encouraging them to have open conversations about online use, increasing media literacy and directing people to safe spaces online for support. It would be fantastic if Ofcom can help to promote this offer.</p> <p>Goal 4 - Samaritans are very supportive of a media literacy week and other initiatives that will help to promote the importance of this topic and encourage people to get involved. Ofcom could play a really important role in coordinating this through your role as convenor. Furthermore, it is important that Ofcom finds regular ways to keep a drumbeat of communications on media literacy. Whilst a media literacy week would be beneficial, there must be a sustained approach.</p> <p>Goal 5 – We were pleased to see the recognition of future technology trends and how you will address this. Forming a working group is a reasonable step but it would need to represent a range of experts experienced in all areas of harm, including self-harm and suicide. Samaritans would be very happy to support this.</p>
<p>Question 4: Do you agree with our assessment of the potential impact on specific groups of persons?</p>	<p>Confidential? – N</p> <p>We support your proposals of targeted work to prioritise groups who are more likely to need additional support with media literacy but recommend that this is done very sensitivity and is informed by subject matter experts (including those with lived experience)</p>

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<p>Question 5: Do you agree with our assessment of the potential impact of our proposals on the Welsh language?</p>	<p>Confidential? – Y / N</p>

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

Overall comments

Whilst we have responded to the set questions asked, we would also like to raise some points about the consultation.

Firstly, we feel the definition of media literacy is unclear, particularly how it relates to online safety and where the boundary is between media literacy and online safety training.

Secondly, the strategy references ‘online services’ repeatedly but nowhere does it state what is meant by this. There are a huge range of online services e.g. user-to-user, static sites, news sites etc. It would be helpful to clarify the criteria to be included within this broad category.

Finally, whilst we were encouraged to see that young people with mental health difficulties may be covered as part of the strategy, we feel that failing to recognise the vulnerability of adults is a missed opportunity. We know that both young people and adults can be vulnerable to dangerous self-harm and suicide related content online and mechanisms by which they can view it e.g. via recommended content pushed by site algorithms. We also know that, like many other groups, young people with mental health difficulties have challenges with the accessibility of community guidelines, reporting content and using site safety features. Whilst we appreciate that Ofcom cannot prioritise all groups within its strategy, we would welcome more information about how Ofcom can support other organisations creating online safety and media literacy training interventions for groups who are not listed as priority within the strategy. It is unclear whether the goals around research, best practice relate to all areas of media literacy and audiences or whether all areas of the strategy will be very specific to the priority groups mentioned.

Samaritans’ Online Excellence Programme, has created a wealth of resources on staying safe online in relation to self-harm and suicide content. We have tailored [resources for users](#), their [parents and carers](#) as well as [training for practitioners](#) on how to talk to the people they support about their online use. It would be fantastic if Ofcom could better support charities like ourselves in helping to maximise resources that are currently available.