

## Your response

Question	Your response
<p><b>Question 1:</b> Do you agree with our proposals in this section? Please explain your reasons and provide any relevant supporting evidence.</p>	<p>As UKSIC we strongly believe in the importance of media literacy as a framework that will help online users and especially the most vulnerable remain safe online. We acknowledge the role that Ofcom and civil societies play in providing people with the necessary resources and enhancing their capacity and agency whilst using online platforms. We therefore agree with the approach that Ofcom is introducing with the three pillars of: a) Research, Evidence &amp; Evaluation b) Engaging Platforms and c) Partnerships. For the strategy to be effective, quality research and evaluation processes are needed, which can feed in the work of platforms and industry. At the same time, partnerships is another significant route which brings together a coalition of stakeholders and partners ranging from Civil Society groups to children and young people.</p> <p>As UKSIC which brings a collaborative and multifaceted approach to online safety we have greatly understood the importance of media Literacy. More specifically, through Childnet's <a href="#">Digital Leader's Programme</a> and the <a href="#">Youth Advisory Board</a> we work closely with children to understand their unique needs in terms of support and media literacy. Additionally, SWGfL one of the partner organisations of UKSIC, operates project evolve which is a digital education toolkit that covers knowledge, skills, behaviours and attitudes across eight strands of our online lives from early years right through to eighteen. These outcomes or competencies are mapped to age and progress. The statements guide educators to the areas that they should be discussing with children as they develop their use of online technology.</p> <p>UKSIC would also like to reflect on our previous response for the call for evidence titles: "Media literacy by design - Best practice principles for on-platform interventions to promote media literacy"</p> <p><u><a href="#">Media Literacy and access</a></u></p> <p>We agree with the majority of the themes, and we think it is particularly useful to draw on the cross-collaborative approach which is our main working method at UKSIC (UK Safer Internet Centre). Perhaps an omission could be access to digital devices in the first place particularly with the rising living costs families may not be able to afford</p>

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	<p>internet costs, or electronic devices. There is a direct link between poverty and the lack of media literacy which seems to be getting worse in the UK in the past year, as the gap between the haves and the have nots seems to widen. According to Nominet and their <a href="#">Digital Youth index 2023</a> “Digital poverty is increasing up to 2 million young people in the UK now lack access to a device suitable for their education”. Additionally, shared devices between adult and child family member also means that parental controls and any other age-appropriate content could be disabled, resulting in children accessing inappropriate content through their parents' accounts.</p> <p>A human rights approach to media literacy and online safety is therefore necessary, particularly since digital rights and access are an integral part of realizing one’s potential through education, work, and socialization. Feed-back loops additionally, could also consider age assurance technologies and partnerships with civil societies who can provide age relevant resources and material</p> <p><b>Artificial Intelligence</b></p> <p>It is also particularly important to adapt to technological developments particularly with regards to generative A.I which is rapidly becoming a daily part of children’s lives. The <a href="#">OFCOM Online Nation 2023</a> illustrated exactly that with “Seventy-four percent of online 16–24- year-olds said they used a generative AI tool”. The proposed services and notifications should provide a strong framework that will also be adaptable particularly with regards to children and the use of AI tools that include chat bots, search engines and other.</p> <p>Our UKSIC <a href="#">research</a> released on Safer Internet Day 2024, see, contains some relevant data in regards to the use of generative AI by children and young people, as well as by their parents and carers, and also captures some useful data on awareness of the Online Safety Act. It also contains data on how both groups wanted to more education on both topics. The data was captured in October 2023, so we would anticipate higher take up now, but then 33% of 8-17s said they have used Gen AI, such as Chat GPT or Snap AI before (37% of parents and carers have used it). Of children who have used it, 72% have seen people their age use it positively, and 53% have seen people their age</p>

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	<p>use it negatively. Although there is excitement and anticipation about the potential for GenAI from young people, 60% of both children and their parents and carers believe Gen AI has safety risks, and 65% of 8-17s want better support to learn about the safe use of it and what to do if they have a problem, and 69% of parents and carers want to learn more about how generative AI is used, so they can help their child stay safe online.</p> <p><u>Awareness of OSA</u></p> <p>Our research also indicated low awareness levels of the Online Safety Bill/Act. Only 32% of children and young people had heard of it, and 42% of parents and carers. Over half of both children and their parents are optimistic about the potential impact of the Act, and 67% of young people say they think such an Act is needed because social media companies need stronger regulations to protect young people's safety online.</p> <p>This is relevant to include, as an awareness of the regulatory regime surrounding media is a part of media literacy, and we found that 57 of 8-17s would like to know more about the Online Safety Act. We would like to see this has clear priority in the strategy for media literacy.</p> <p><u>Partnership</u></p> <p>We are also quite unclear on the effective involvement of external stakeholder input which is not clear in the strategy in this section. The relationship with stakeholders is described as from Ofcom outwards, rather than drawing from wider stakeholders in to support this area of work carried out by Ofcom.</p> <p>Media literacy needs to be "everyone's business" (Ofcom ML strategy 24). This was a viewed shared by young people expressed by young people in a focus group we ran of our young people (Childnet's Digital Champions) with Ofcom, they said that it was 'really important to have a multi-stakeholder approach ...If only one body does it, it does not necessarily translate in the long run". Ofcom can add great value in a convenor and catalyst role. Listed as an indicator of success is 'We will have an expanded network of research partners and stakeholders nationally and internationally', although it was not clear what steps were being taken to achieve this. This is an important goal, and but it isn't obvious from the strategy how this</p>

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	<p>network provides information to Ofcom. In this vein, it would be useful to know about how Ofcom is determining the areas of research being taken, as the inclusion and input from key stakeholders was less obvious in the ‘How we play it’ section for Research Evidence and Evaluation. Ofcom is doing great research across a wide range of relevant areas, but it would be useful to know what mechanisms exist for the public and stakeholders to input, for example, by raising issues, or vulnerable population groups, something which could be useful to include in consideration for future research areas, as well as ensuring that it is informed of research taking place by others.</p> <p>Additionally, the Making Sense of Media Advisory Panel, is not mentioned in this section of the strategy, and we would anyway encourage a broader or different body/mechanism to enable this wider input to support the Research, Evidence and Evaluation stream of work. We suggest Ofcom’s strategy should include external stakeholder input as well as the be clear on both the value Ofcom place on that as well as the mechanisms for enabling this.</p> <p>A further consideration is explicitly ensuring the inclusion of related and relevant research, such as around online harms and safety, rather than exclusively about media literacy per se. Useful input here could be from existing networks, such as the UKCIS Evidence and Early Warning Working Group, as well as individual organisations at national as well as local level. Conversation with Prof Julia Davidson OBE, the chair of the UKCIS Evidence Group allows us to share that she also takes this view.</p> <p>Mechanisms for supporting the input of youth voice can be helpful here, in addition to the direct activity carried out by Ofcom. This will support this work being responsive to need.</p>
<p><b>Question 2:</b> 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><b>Safety-by-design</b></p> <p>Ofcom deserves commendation for swiftly assuming its new responsibilities. However, it must maintain transparent communication with the public about the scope of authority granted by the Online Safety Act to prevent erosion of confidence in the new regulatory framework. Concrete plans regarding industry fees, enforcement proce-</p>

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	<p>dures, automated monitoring, and other pertinent matters need to be promptly established. Considering that no other country has implemented comparable online safety regulations, Ofcom must seize the opportunity to build on its initial progress. Moreover, it should expedite collaboration with domestic and international regulators, recognizing its pivotal role in leading a global initiative to find the appropriate equilibrium between online freedom and safety. Support the outlined default settings and can see the protections these will offer young people. And support the provision of supportive information in a timely and accessible manner to help users make informed choices when they seek to change their settings, for e.g. to disable default, or receive a direct message from another user for the first time. These measures support wider digital literacy as well as provide key potential protections against risks such as grooming and financial online sextortion.</p> <p><u>Artificial Intelligence and the User Journey</u></p> <p>Platforms have a significant role to play in ensuring that they provide an accessible and easy to navigate the reporting system. For many young people reporting and accessing their data is a very complicated process, even though they are legally allowed to be using the platform if they are over 13. For instance, Meta's recent announcement to introduce A.I systems that will be trained through the user's content providing, the users with the ability to opt out of the service. The process of opting out however, is particularly difficult to navigate and opt out of the service. The UKSIC would therefore like to reinforce the need for accessible terms of service and reporting systems.</p> <p><b>Focus group with children</b></p> <p>Ofcom in partnership with Childnet hosted a focus group with 8 children on the 3<sup>rd</sup> of June discussing media literacy and their experiences online. The responses are summarised below:</p> <p>Overall, children have recognised Online platforms, particularly social media sites such as Snapchat, TikTok, and Instagram, play a significant role in the lives of young people. However, there are several critical issues that need</p>

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	<p>addressing to ensure a safer and more responsible digital environment.</p> <p><u>Susceptibility to Bias</u></p> <p>Young people are highly active on social media and are particularly vulnerable to not understanding inherent biases within these platforms. It is imperative to enhance their media literacy and critical thinking skills to mitigate these risks.</p> <p><u>Transparency and Accountability</u></p> <p>The transparency and accountability of online platforms are crucial elements. While beta-testing and new feature trials can offer valuable insights, they often overlook the potential knock-on effects. Social media companies frequently test new features on real users without adequately considering the associated risks, which can have significant and lasting consequences.</p> <p>Particularly during sensitive periods, such as elections, the lack of transparency can expose users to undue risks. Companies must invest more in helping users understand the content they encounter online. Features should undergo rigorous testing before deployment to prevent irreversible harm.</p> <p><u>Corporate Responsibility:</u></p> <p>Many social media companies are private entities and might perceive their responsibilities as limited to their platforms. However, given their integral role in the broader internet ecosystem, they bear a larger responsibility and should 'try to assist with helping (Media Literacy enhancement outside of their service)'. The rapid proliferation of media-related issues in recent years can be attributed in part to social media platforms.</p> <p>Although these firms are private, they benefit significantly from user engagement. Therefore, they should inherently incorporate a 'safety-by-design' approach from the outset. Should they resist legislative restrictions, alternative mechanisms must be developed to counteract the negative impacts they sometimes create.</p>

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	<p>The tech industry should aim to not substitute the responsibility of keeping users safe with the creation of supporting documents and guides. The responsibility of being safe should be mostly on the platforms who have the capacity and resources to change their services, terms and conditions and make them accessible, safe and age appropriate.</p> <p>In conclusion, while social media platforms provide substantial benefits, they must also prioritise user safety and transparency. The government urges these companies to adopt a proactive stance in addressing these issues, ensuring a safer and more accountable digital environment for all users.</p> <p><b>Sustainability in funding and civil society groups and NGOs</b></p> <p>Point 3.7 outlines how platforms “can best support users by providing information at different points in the user journey, including providing context on the content that they see online’. It outlines several specific issues, but not included in this list is any reference to contact risks, or communications with others. Given the current concerns around online sextortion, and the developments made by Instagram and Apple to provide warnings to users either about to send or receive images containing nudity, there is scope around the communication side of media literacy, ie the Contact as well as Conduct risk, which are relevant here, and would merit being specifically referenced. Media literacy is often considered in terms of a user’s understanding of content, but for this strategy, it needs to be demonstrably wider, and safety by design is relevant here.</p> <p>We generally support the approach taken in this section, and certainly agree with the value of multi-year investments to enable effectiveness of programmes. We would encourage the measurement of effectiveness of online service on service media literacy to look at measurements including behaviour change in addition to click throughs.</p> <p>In the discussion of the partnerships between online services and third parties to deliver direct interventions, there has to be a consideration of ‘branding’ and a responsible approach adopted. There is a real need for</p>

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	<p>funding in this area and a high demand of education sessions in schools for example, and online services can provide a valued source of financial support to this work, but there are ethical considerations about the promotion of brands in the process of doing this. Explicit or implicit endorsements of brands is something that third parties will need to guard against in order to keep their independence of voice and the trust of their audience. How this is managed could be considered for inclusion in the best practice principles for media literacy initiatives.</p>
<p><b>Question 3:</b> 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><b>Education</b></p> <p>We have stressed the importance of including media literacy in school settings and the education curriculum particularly in the ages when children are digitally active. <a href="#">ProjectEVOLVE</a> is a toolkit aligned with the UKCIS (UK Council for Internet Safety) framework "Education for a Connected World" (EFACW), encompassing knowledge, skills, behaviours, and attitudes across eight strands of online experiences from early childhood to age eighteen. Mapped to age and progress, these competencies guide educators in discussing areas with children as they navigate online technology. We aimed to avoid prescriptive activities instructing students on what actions to take or avoid. Instead, our goal was to facilitate meaningful discussions through well-formulated questions complemented by accessible and informative content, aiming to shape critical thinking and dispel misconceptions. This comprehensive approach was consolidated into a toolkit designed for easy navigation, presenting a significant resource to teachers and students.</p> <p><u><a href="#">Peer-to-Peer</a></u></p> <p>The second case study refers to the notion of creating a cascade of media literacy by equipping young people themselves as instructors of digital safety.</p> <p>The <a href="#">Childnet Digital Leaders Programme</a> offers schools an interactive online platform for primary or secondary education, empowering students to become online safety peer mentors, and has received positive feedback, with 85% of participating teachers noting its efficacy in fulfilling</p>



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	<p>safeguarding duties. The impact report of the 2023 activity demonstrates the program's effectiveness, with all surveyed teachers believing that peer-to-peer media literacy sessions were more effective. Additionally, 76% of participants stated that the training helped them to keep themselves safe online.</p> <p>The criteria should be long term and not only measure resource visits, but the long-term impact on the user experience.</p> <p>We agree that people and partnerships should be at the heart of Ofcom's approach (4.7), and it would be good to see what input Ofcom are receiving from stakeholders here. There is an Advisory panel, and mention of working groups, but transparency around this area of work would be useful, so stakeholders can be confident in the voices that Ofcom are hearing as well as what they are hearing, and for clear opportunities for Ofcom to listen to key stakeholders are provided. There are many organisations at a national and local level who can support and feedback on the work of Ofcom, and it would be important to be clear on how these external stakeholders can play their part.</p> <p>We would support looking at initial teacher training providers, and we would be keen to discuss this. This is an area which has been looked at before, and there is real pressure on the timetable of teacher training, as well as a number of training providers.</p> <p>A view expressed in our youth meeting of the Childnet Digital Champions is worth noting here, in relation to how such interventions to parents and carers, educators as well as other professionals working with children/ "When you are talking about literacy to people, it can make them feel uncomfortable because it is as if they do not understand. If you can make it adapted to one's experience and situation it might be more effective as they will not feel as if they are being lectured". The language used to describe such interventions has to be deliberately designed to engage, and the language of 'literacy' including 'media literacy' risks not achieving that. That is something which should be taken into account when thinking about Media Literacy Week.</p> <p><b>Media Literacy week</b></p>

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	<p>We have great experience in organising <a href="#">Safer Internet Day</a>, which we would be very happy to share. This is an annual campaign that we have been organising as a UKSIC since 2011, and we have reached an awareness of the Day to 52% of 8–17-year-olds and 32 % of parents and carers. We have great impact stats too as a result of this reach. For more information you can access the impact report here: <a href="https://saferinternet.org.uk/safer-internet-day/safer-internet-day-2024/impact-report">https://saferinternet.org.uk/safer-internet-day/safer-internet-day-2024/impact-report</a>.</p> <p>From our experience, there are different ways to organise such awareness weeks, but it would be good scope out what the key objectives are, who sets them and how the week will be organised. Budget questions will arise, as well as what partnerships you will be looking for. On concern of ours would be that it wouldn't take away from or compete with existing initiatives, but look to add value to what is there already, and care would need to be taken with Safer Internet Day for example, that this week is distinct, and communication would be key here. It is possible to imagine how an online provider under scope of the OSA might be inclined to prioritise supporting a regulator-led initiative over others.</p>
<p><b>Question 4:</b> Do you agree with our assessment of the potential impact on specific groups of persons?</p>	<p><b>User-Centric Design and Timely Interventions</b></p> <p>We propose the introduction of resources and materials aimed at empowering users and recipients with the requisite skills. The objective is to enable them to conduct media literacy lessons and, consequently, educate others on relevant media literacy issues. This approach aims to establish a cascade effect, fostering an expanded reach of media literacy within a digital literacy framework, as evidenced by initiatives such as the Childnet <a href="#">Digital Leaders Programme</a>.</p> <p>We would also like to see an inclusion of the tech industry and in general the private sector as contributors to media literacy and digital access. The Digital Poverty Alliance, which consists of charities and tech companies shows that a collaborative approach can be beneficial.</p> <p><b><u>Prioritization, Transparency, and Accountability in Implementation:</u></b></p>

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	<p>The complexity associated with implementing a media literacy policy may pose challenges for smaller platforms, given their limited resources and capacity.</p> <p><b>Measuring Impact:</b> Defining clear and effective metrics to assess the impact of media literacy interventions is inherently difficult due to the multifaceted nature of the concept.</p> <p><b><u>User-Centric Design and Timely Intervention:</u></b></p> <p>Determining the optimal timing for delivering information relevant to users' actions requires a careful balance to prevent overwhelming or irritating them. Additionally, the importance of continuous user engagement post-implementation is critical but may not be explicitly stated.</p> <p><b>Cultural and Language Diversity:</b> Addressing the needs of users from diverse cultural and linguistic backgrounds is vital for achieving truly inclusive design.</p> <p><b>Privacy and Security:</b> Ensuring that user-centric design prioritizes privacy and security, especially when collecting feedback and data for improvement, is paramount.</p> <p><b>Scalability:</b> Developing strategies to scale interventions to accommodate growing user bases and evolving platform functionalities is essential.</p> <p><b>User Education:</b> In addition to intuitive design, explicit efforts in user education are necessary to enhance digital literacy and platform understanding.</p>
<p><b>Question 5:</b> Do you agree with our assessment of the potential impact of our proposals on the Welsh language?</p>	<p>Confidential? – Y / N</p>

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