• Question 1: Do you agree with our proposals in this section? Please explain your reasons and provide any relevant supporting evidence. Research, evidence and evaluation

In our response to this consultation we would like to reiterate our advisory remit, as it extends to Scotland, and we will therefore concentrate on those areas that we believe are of particular interest and importance to Scottish consumers.

We agree that media literacy must be the responsibility of everyone and that Ofcom's role as a catalyst and convenor is the right approach for the regulator to take. Ofcom's established history and track record in research and evidence gathering is intrinsic to this role and will be invaluable in the development of policy and successful interventions. It is this research and evidence that will enable conversations to begin throughout the country and appropriate interventions to be developed.

It is also this research that will reveal any differences between communities or specific groups and we would encourage Ofcom to continue to explore this. It is unlikely that one policy will suit all. Consumer experiences online may be relatively similar, but the interventions will be localised and therefore different.

Within Scotland for example, we are aware of the many different challenges that rural communities face and we would welcome more research here. Targeted research to identify if there are any specific differences in the current level of media literacy skills between urban and rural/remote communities would be valuable. And if rural is found to be lagging behind, then determining what correlations there are to the ratio of urban to rural digital infrastructure provision, or accessibility to media skills training in rural locations would also be revealing. Evidence gathering, using qualitative and quantitative research, will help answer these questions and will help communities to develop a local solution that suits them.

As the media literacy convenor, Ofcom will also have an important role in sharing insightful research from other bodies. An example of this, and in the area of exploring rural v urban experiences , SWGfL have been working with Edinburgh university [researching the experiences of rural Scottish women in relation to online harm and abuse](). The findings are that women in rural areas are experiencing abuse online; they find it more difficult to report abuse due to stigma within the community; it's more difficult to access support services; and

professionals' skills and knowledge of online harms is variable. The interesting aspect to this research is that it suggests that those in rural communities are at less risk online. The next question has to be as to why that might be. Is it as a result of digital exclusion (infrastructure, financial challenges etc) or some other factor?

We would also like to stress the value of qualitative research in understanding individual experiences. Larger quantitative research can often mask challenges within smaller subsets and it is important that in this area, we understand individual stories and the impact that media literacy (or illiteracy) can have on consumers and families.

• 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.

We agree with Ofcom's analysis and proposals in relation to working with platforms. Engaging with platforms will be key in delivering Ofcom's media literacy strategy and this is closely linked with Ofcom's overarching objective of delivering media we trust and value. We welcome Ofcom's approach, reiterating that online platforms, broadcasters and other service providers all now have a shared responsibility within the area of media literacy. There are a number of areas that they can contribute. They have an important role to play in the design of their platforms, ensuring that they are consumer friendly. The new area of of AI is extremely important in the development of a media savvy society and the platforms need to be transparent about its usage and using signposting when appropriate.

Media plurality is also key consideration within this area and is important within Scotland where there is a need for UK, Scottish and local news. This plurality is currently delivered through BBC Scotland and STV. The health and sustainability of these two Scottish broadcasters is therefore key to delivering those different perspectives that allow audiences to engage, understand and make up their minds. This is particularly important as broadcasters gain the freedom to deliver their PSB content online. The world of online is different from the home of traditional broadcasting as the careful curation that has existed in the past is absent from the online world.

We would recommend that Ofcom monitor any unintended consequences linked to this move to an online delivery, ensuring that plurality is maintained.

We also welcome the commitment within this strategy to explore how public service broadcasters might address media literacy considerations. Both of the Scottish PSBs have a history of collaboration with educational institutions in the area of broadcast media careers and training. These contacts and networks should now be explored to help deliver media literacy, across on air and online.

• 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.

We agree with Ofcom's proposals in this section and would like to emphasise here the differences between Scotland and the rest of the UK. Even if the experience of people in Scotland might not be that different from the rest of the country, the approach taken by national and local organisations will be.

Education, the natural home for media literacy, is a devolved issue in Scotland. The legal system is different and the communications network has unique geographical challenges. These will mean that the interventions and strategies developed in Scotland will differ from the rest of the country.

There is already a great deal of interest in media literacy within Scotland. In response to a Public Interest Journalist Working Group report, the Scottish Government acknowledged the important role media literacy initiatives play in tackling the issues of disinformation and misinformation, stating that they believe that ' It is vital that people in Scotland have an ability to critically assess information online and in print, to ensure a functioning democratic society with an informed, media-confident populace.'

They have cascaded this commitment to media literacy into Scotland's educational strategy - Curriculum for Excellence.

The Curriculum for Excellence is delivered by Education Scotland and digital literacy is one of the key themes being delivered in schools throughout Scotland. Its aims are 'supporting young people to become successful learners, confident individuals, effective contributors and responsible citizens, both in

terms of supporting the development of critical thinking skills but also in allowing them to develop skills that will prepare them for the world of work.'

The Scottish Government also recognise media literacy as being a key driver of economic growth.

The government's latest **UK Employer Skills Survey (2022)** shows that one-third (33 per cent) of Scotland's skills shortage vacancies are due to a lack of digital skills. This includes foundation skills such as being able to turn on computers, change passwords, carry out basic computer software functions, use the internet and communicate via email.
As a result of this skills shortage, Skills Development Scotland have produced a skills strategy focussing on this area. Their **Digital Economy Skills Action Plan 2023-2028**, aims to grow digital skills across the nation's economy which they believe could help realise a potential £25 billion economic gain.

The approach of upskilling and 'training the trainers' is also being embraced by other public bodies, local authorities and includes commitments by the NHS and COSLA to upskill their staff and work with educational institutions to promote digital skills training.

We consider embedding media literacy in service delivery and everyday life as an important development, and the potential role of public services in this agenda is key. There are many frontline services which could have an important role by building media literacy into their day-to-day conversations. The pharmacist or practice nurse, who has regular and trusted contact could help with health misinformation.

And for those more vulnerable consumers, the work of third sector organisations remains an important touch point, through their development of innovative initiatives, specifically aimed at their target group. The charity Young Scot has just launched Infowise – a programme which provides young people with tools and resources to build their **confidence in information literacy.** The **InfoWise programme** helps schools and youth groups ensure that young people have the skills to challenge misinformation, access reliable, accurate and understandable information and understand their key digital rights.

The National Library of Scotland collaborated with Young Scot's digital campaign Global Misinformation Awareness Week and the SQA (Scottish Qualifications Authority) recently published a report and guidance for teachers on the use of A1 within the education system.

It must all start with people and the role of the individual, parents and families should not be forgotten. Offering a media literacy course in the local library does not mean that people will come. And even with the appropriate tools and training, it still does not mean that individuals will use them well. Media literacy will need to be interwoven into everything we do and must avoid existing as a silo.

There are many disparate groups working in their own areas, designing, pushing out and evaluating media literacy initiatives and Ofcom's role as convenor will be an important one, allowing sharing of best practice and successful interventions. Underpinning this is the intersection between Ofcom's UK-wide media literacy and online safety duties and the devolved responsibilities of the Scottish Government, Scottish Parliament and other delivery bodies. Working on making these as complementary as possible would be a positive outcome for Ofcom.

• Question 4: Do you agree with our assessment of the potential impact on specific groups of persons?

We agree with the assessment and we welcome the emphasis outlined in section 3(4) of the Communications Act which requires Ofcom to have regards to the needs and interests of persons in the different parts of the UK, of the different ethnic communities within the UK and of persons living in rural and in urban areas.

• Question 5: Do you agree with our assessment of the potential impact of our proposals on the Welsh language?

We have no comment to make on the proposal for the Welsh language. However, we feel it is important to record that the status of Gaelic and the Scots language is being discussed within the Scottish Parliament, with the introduction of a Scottish Language Bill in November 2023. The policy objective of this Bill is to provide further support for Scotland's indigenous languages, Gaelic and Scots. It will place a duty on Scottish Ministers to prepare a Gaelic language strategy and the power to prepare standards for public authority activity, including Gaelic education. There will be a requirement on Scottish public authorities to produce a Gaelic language plan and will introduce the possibility of areas of linguistic significance to allow for proportionate delivery. The Bill will include a duty on Scottish Ministers to prepare a languages strategy

for Scots and to prepare secondary legislation on Scots. This is the first time that Scots has featured in legislation.

We would therefore suggest that it would be useful for Ofcom to monitor the progress of these ambitions.