Your response

Question	Your response
Question 1: Do you agree with our proposals in this section? Please explain your reasons and provide any relevant supporting evidence.	Confidential? –N Ofcom's Media Literacy Strategy does not explicitly address media literacy concerning commercial communications and the identification of communication sources, including marketing communications. There is growing recognition that this important area of work should be included in media literacy and so we repeat below points made in our December 2023 submission to Ofcom's consultation on *Media literacy by design - Best practice principles for on-platform interventions to promote media literacy* The material of greatest interest for the Branded Content Governance Project are disclosure statements and other forms of identification that inform users that content is marketing communications, or is sponsored content, or is otherwise subject to payment or other economic consideration by the first party (content creator) or by a third-party (sponsor, source). It is crucial for users to clearly understand when they are being marketed to, whether the content is sponsored or is subject to a transactional relationship involving payment or other economic consideration. This transparency can be achieved through effective labelling and notifications, like the kitemarking/signage used for product placement, ensuring users can easily identify the commercial foundation of the content they consume. It is important that disclosure is not restricted to notices attached to specific content only, but forms a range of required, or best practice, measures taken at different levels, from specific content, to app/service level, to owner/'corporate' level. For instance, platforms, publishers and other content providers should be encouraged, and above certain resource levels required, to carry statements on how commercial/sponsored content is managed on the service overall, and include short, accessible guides to the labelling and identification of content.

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	There is also an important role to extend the use of kitemarking or other signage that will provide more consistent and readily understood identifiers for commercial (and other) content policies. Some news publishers already use such kitemarking to indicate how they deal with sources and fact-checking. In future, this might be developed to demonstrate agreed standards towards the identification, and separation, of media content and advertising. Ofcom oversees the requirements for disclosure of product placement in domestic broadcasting by means of a consistent 'P' sign. There is currently no such equivalent for branded content across any other media forms/platforms. As these media forms continue to converge and co-develop, such anomalies need to be discussed and addressed as part of the core agenda for media literacy and the policy/governance actions to support the widest range of communication users.
	The YouGov user research commissioned by Ofcom for its *Media literacy by design* consultation makes clear the importance of the disclosure and identification of paid posts and commercial communications for research participants. 'Labels about paid promotions were also considered useful by those who saw them on social media, because they offered transparency and helped participants make informed decisions knowing that the information presented was not impartial' (YouGov 2023: 15). Such disclosure labels were considered the second most useful form of intervention by platforms amongst those surveyed.
	It is important to add commercial/sponsor disclosure for the reasons outlined above and for the following key reasons.
	1. For users, the degree to which commercial/sponsored content can be readily identified and properly understood are vital, core issues for digital media literacy.
	2. For policymaking, it is valuable, and we argue essential, that there is greater coherence and integration across the governance of branded content. Ensuring that the disclosure of marketing communications and sponsored content is included will connect Ofcom's media literacy efforts with existing governance arrangements for advertising/adtech, media and platforms as well as related policy areas including dis/misinformation.

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	3. The research evidence (see below) shows that there remain poor levels of recognition and understanding of commercial/sponsored content amongst both adults and among children and young people across the range of platforms that carry such branded content, from publishing and audiovisual to social media.
	4. Research shows that an idiosyncratic array of descriptions and other means of identification are used by publishers, platforms, content creators, marketers and intermediaries. Whether by accident or design this results in continuing confusion for users, and helps marketing that seeks to be 'native', succeed in blending into the communication environment in which it is placed.
	5. The existing governance arrangements (notably the CMA, CAP-ASA, Ofcom) do have well-developed rules and disclosure requirements, including relative standardisation on many platforms around #ad/advertisement labelling. However, the ASA's own monitoring and research reveal high levels of non-compliance and continuing evasion of disclosure requirements. See the ASA's *Influencer monitoring report* (March 2021), available at https://www.asa.org.uk/resource/influencer-monitoring-report-march-2021.html
	This makes the inclusion of commercial/sponsor disclosure in media literacy design an essential task.
	Future research will need to assess the effectiveness of disclosure notifications. The well-documented forms of invisibility, 'banner blindness', or evasion, that can affect brand messages also apply to the labels disclosing such brand communications. This means that assessing how well disclosures are identified, understood, valued and effective across a complex, rapidly evolving media-marketing ecosystem makes this an essential and ongoing area for attention in media literary research and programme design.
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	

Question	Your response
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.	
Question 4: Do you agree with our assessment of the potential impact on specific groups of persons?	
Question 5: Do you agree with our assessment of the potential impact of our proposals on the Welsh language?	