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 SCVO has understood the link between digital inclusion and media literacy for some time, and has worked extensively to understand how they can become better embedded in the delivery of services. Part of our frustration has been the limited nature of research and access to resources in this area. We therefore support Ofcom's proposals to enhance and better cascade the research, evidence and evaluation surrounding media literacy. We feel that providing a strong evidence base and ensuring that resources are well designed, easy to access and free will support the public knowledge and confidence in delivering interventions. **SCVO's response to Ofcom's proposals** It is central to the development and cascading of media literacy that: (a) it is as a concept, understood and evidence-based, and (b) learning and resources are openly and transparently shared. We therefore support the proposals from Ofcom around research, evidence and evaluation – particularly with reference to stronger research around priority groups and marginalised voices. We are particularly pleased to see an increased focus on harmful digital activity against women and girls, which is an area we are currently engaged in. *'Continue to use our research to inform our policy development and media literacy interventions, and to encourage its use and further analysis by stakeholders.'* There is a significant need to develop popular understanding of media literacy and how it can be embedded into all walks of life. Many publicly available interventions focus on young people and education – while older cohorts lack access to meaningful or useful support. We support building a strong, evidence-based case which enables the development of better and more robust resources. A lack of knowledge or comfort around how personal information and data is used, not being able to manage

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	privacy settings and fear of scams is one of the key factors perpetuating digital exclusion in the UK (p. 52). Work to promote improved understanding in this area is vital in empowering users to take control of their digital lives.

'Amplify the voices and testimony of a range of groups within society so that our research is useful to as many people and organisations as possible.'

In our promotion of how services can effectively design for digital inclusion, we promote a [framework of four elements](#) (Understanding, Approach, Resource, and Partnership). This is based on our extensive understanding of insights and experience, and we feel it is applicable to embedding media literacy. Developing a full understanding by engaging with the groups services and strategies plan to impact is crucial and we are pleased to see Ofcom commit to amplifying marginalised voices.

'Share our knowledge on 'what works' in media literacy delivery.'

For organisations delivering media literacy interventions, the majority of which take place in the voluntary sector, access to resources across a range of topics and mediums are vitally important. SCVO has developed and delivered a [Media Literacy Pathway](#) to support learners and practitioners improve skills in this area. While we support the activities outlined in this area, we would also encourage:

- Uniformity around what media literacy looks like, either through the adoption or adaptation of a common Media Literacy Skills Framework (such as [DCMS, 2021](#))

- An accessible front-door for resources and information, free for organisations developing or delivering media literacy interventions.

Our experience in the development and delivery of the [Essential Digital Skills Framework](#) has given us solid grounding in understanding the benefits of a commonly understood, regularly updated and maintained framework. These benefits include the ability to baseline and measure progress at an individual, organisational and national level.

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	'Support providers of media literacy initiatives to carry out evaluation, leading to a culture where best-practice approaches are developed, shared and used to develop more effective interventions.' Embedding effective evaluation for any kind of intervention is often difficult, and in the voluntary sector this is particularly relevant given competing priorities of capacity and resource. Experience and insights of programme delivery across Scotland provide us with evidence that in order to do this, evaluation must be easy to access and administer. We support the creation of a framework, as long as it is designed well, is easy to use and captures information in a way which does not require excessive time or resource from delivery organisations.
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	Confidential? – N We believe that engaging with platforms is a crucial element of promoting better media literacy for users of all ages. Services and platforms should be encouraged to practice inclusive design, as we promote in our '[Digital inclusion roadmap for Scotland](#)'. Organisations that design online services or platforms have a role in ensuring that they are accessible, and that potential harms and risks are mitigated. The role of businesses and platform developers has come increasingly under scrutiny as well – the Scottish Government's '[Building Trust in the Digital Era](#)' (p. 67) outlines that businesses should: 'ensure greater transparency about the sources of information online in ways that are easy to verify', 'build in ethical controls on the development and implementation of advertising algorithms', and 'have clear and user-friendly reporting procedures for abuse/harassment'. **SCVO's response to Ofcom's proposals** The overarching approach to working with platforms as part of the media literacy strategy is positive, but we feel that it could be strengthened. There is important consideration for the role of the voluntary sector within this workstream, and we propose a more collaborative and

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	co-productive approach to ensure that the work platforms undertake is effective, well-targeted and avoids duplication or compounding inequalities.

'*Build on work prioritising users' media literacy on platforms by promoting best practice*'

The evidence of the impact of social media, the way it is designed and how technology is shaping our lives is building globally. We believe that any service or platform which benefits from online engagement has an ethical responsibility to ensure it is designed in a way which mitigates harms and is easy to access and use.

'*Ensure that platforms embed evaluation to build understanding of what works to promote media literacy*'

Effective evaluation of media literacy interventions are typically rare (p. 52). As with digital inclusion, media literacy does not have a one-size-fits-all solution and therefore we would encourage platforms to consider a broad range of potential interventions, all of which require effective evaluation. Key to this will be ensuring transparency in how programmes are evaluated to provide trust in results.

However, we strongly support fostering a culture of sharing learning in this area. We also support Ofcom's role in being clear about recognising when platforms 'could be doing more', to ensure users and consumers make informed online choices.

'*Work to ensure platforms' funding of media literacy programmes*'

Voluntary sector organisations provide the majority of media literacy interventions (p. 44). The voluntary sector is often best placed to provide support for communities of people but is increasingly lacking in capacity to deliver. This is a direct result of funding cuts, whether in terms of amount awarded or duration of grant. Our perspective on digital inclusion, which extends to media literacy, is that businesses or platforms which benefit from engagement should assume responsibility in supporting individuals and organisations and alleviating pressure on the voluntary sector.

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	We agree with Ofcom's proposals which encourage platforms to contribute towards greater funding in this area, but with the following caveats: • Platforms take a collaborative and co-productive approach which seeks to understand the needs of the user as well as the needs of the supporting organisation. This embeds the user-focused approach highlighted within the other proposals in this section. This also mitigates against the potential challenges outlined on p. 13 of the consultation paper. • Platforms work in partnership with each other to avoid duplication of activity and target resources meaningfully. • Platforms follow the [Fair Funding approach](#) to support a sustainable voluntary sector.
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.	Confidential? – N As the membership body for Scotland's voluntary sector, SCVO recognises the power and purpose of working in genuine partnership. As the leading voice of digital inclusion in Scotland, we also understand the importance of embedding and prioritising vital skills for the 21st century. We are pleased to see Ofcom articulate media literacy as 'everyone's business', which is exactly how we talk about digital inclusion in our [2023 roadmap](#). **SCVO's response to Ofcom's proposals** Digital inclusion and media literacy are inextricably linked, and so we welcome Ofcom's proposal to build on digital inclusion infrastructure and ensure that interventions, expertise and resources are targeted. However we would encourage developing a strong understanding of the issues around digital inclusion as they pertain to devolved nations, and ensuring parity of esteem for the voluntary sector as delivery and strategic partners. *'Commission targeted interventions in the cohorts where the need is greatest and share best practice with the sector.'*

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	We welcome Ofcom's sustained focus on key topics outlined in this section, particularly with reference to online misogyny and protecting personal information. *'Expand our training offer through partner organisations delivering CPD courses'* We support proposals for expanding CPD offering, but would welcome these resources being made widely available to a broader range of practitioners. For example, community learning and development professionals and youth workers. Providing CPD for professionals in the voluntary sector would work towards the targeted approach discussed earlier. *'Continue to build on the digital inclusion infrastructure, so that those new to technology can start and continue well.'* SCVO has been promoting and leading the digital inclusion agenda in Scotland for over a decade. In that time we have amassed a strong knowledge about the issues, interventions and challenges involved. Over the last few years, we have started to explore issues of media literacy into our understanding of the essential skills users need. We welcome Ofcom's place-based approach to embedding media literacy into digital inclusion work. In 2021, SCVO pioneered the [place-based approach to digital inclusion](#) which we have repeatedly advocated for in our work. We do this for multiple reasons: • People learn better with trusted faces in trusted places. For the digitally excluded, this is likely to be in their local communities in services they access regularly. • People facing digital exclusion also face a range of other barriers to accessing support, including financial, motivational and physical – local access helps to mitigate these barriers. • Place-based work is cost-efficient and encourages closer collaboration and partnership working at a time when resources are scarce.

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	• The responsibility for digital inclusion is shared among organisations and different parts of the community can become engaged in the process. We support the proposal to build on existing digital inclusion infrastructure, but recommend: • Ofcom considers and builds in support for the capacity of organisations and 'digital inclusion experts' mentioned in the proposal. This should include considering how organisations are resourced, in terms of finance and staff, to deliver on media literacy outcomes. • Ofcom works closely with partners in the devolved nations as well as central UK Government to understand the differences in policy, approach and status regarding digital inclusion. A pan-UK approach is inappropriate for this work. • Ofcom takes the broadest possible view of 'digital inclusion', moving beyond local delivery partners and considering wider infrastructure including telecoms and the role they play in this work. *'Forge new relationships and expand our network to make media literacy a priority for a wider range of organisations.'* Developing a wide range of voices to contribute to the discussion is a key priority for the promotion of media literacy and digital inclusion, and we support any action which brings more organisations and individuals on board. We welcome the activities outlined in this section, but recommend: • Learning from our experience of promoting the embedding of digital inclusion in the voluntary sector (and beyond) in Scotland, in that organisations need to be supported with both capacity and resource in order to effectively create change. • Parity of esteem for voluntary sector partners and avoidance of the expectation that these organisations can take on extra work without extra resource.

Question	Your response
	'Build on our role as a convenor of media literacy experts to co-create policy and practical recommendations.' We welcome Ofcom having a central driving role in improving media literacy in the UK.
Question 4: Do you agree with our assessment of the potential impact on specific groups of persons?	Confidential? – N We agree that the strategy is likely to have a positive impact on minority communities. We encourage Ofcom to adopt a co-productive approach in development of workstreams to ensure sustained inclusion and equalities.
Question 5: Do you agree with our assessment of the potential impact of our proposals on the Welsh language?	Confidential? – N SCVO operates exclusively in Scotland and is therefore unable to comment on the impact of proposals on the Welsh language.

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