

Your response

Question	Your response
<p>Question 1: We include labels, overlays, pop-ups, notifications, and resources as examples of on-platform interventions (additional information regarding this typology can be found in the Annex on page 3).</p> <p>(a) Do you agree with this categorisation of on-platform interventions?</p> <p>(b) If not, please explain.</p>	<p>Confidential? – No</p> <p>a) Yes</p>
<p>Question 2: Do you have any feedback on the summary of themes we identified from online services? Are there any omissions or other items you think important to add?</p>	<p>Confidential? – No</p> <p>Scams and fake news are increasingly prevalent on online platforms, and existing interventions aren't working. In the UK 10 million people lack basic digital skills, the number who don't show media literacy is likely to be much higher but doesn't appear to be measured. Platforms need to recognise that there is a massive gap here, and the awareness and need for public education for all age groups needs to be built in as a theme, recognising the different needs of different groups. Comments on how 'platforms have an important role to play in increasing users' media literacy' need to consider the fact that this role may vary between different age groups. For example, young people may need more support to detect fake news and protect themselves from harmful online content.</p>
<p>Question 3: Are we missing anything with the three headings used to structure the best practice principles for media literacy by design?</p>	<p>Confidential? – N</p> <p>While the best practice principles document states that it is 'separate from VSP and online safety duties', it is essential that online safety is incorporated as a key principle in any strategy</p>

	<p>which prioritises media literacy. A key aspect of media literacy is the ability to think critically about online content in order for users to protect themselves from the proliferation of fake news and upsetting content. Best practice principles must therefore incorporate resources and information to users to allow them to protect themselves and others from online dangers such as false information and upsetting content.</p> <p>Another important aspect concerns understanding whether there may be more specific principles relating to the types of harms that users experience and the effectiveness of different types of interventions within these contexts. Whether, for example, there should be different types of media literacy interventions for scams and frauds content as opposed to political misinformation, for example. We recognise the value in the work that Ofcom is undertaking to develop a broad conceptual framework, but over time there may be value in scoping media literacy design principles as it relates to different types of consumer harm.</p>
<p>Question 4: Which aspects of the proposed best practice principles for media literacy by design work well, and why? Which aspects don't work so well, and why? Do you have any comments on the specific principles (please specify if providing feedback on individual principles)?</p>	<p>Confidential? – N</p> <p>As a whole, the best practice principles cannot work well if companies are allowed to enforce these principles on an individual basis. For the principles to be carried out effectively, there need to be clearly defined, universal parameters and requirements for all companies to meet. More detail on how this applies to specific principles can be found below. An important aspect of media literacy is the degree to which individuals can critically analyse and interpret information. This is likely to vary significantly not just between but also within groups. Higher levels of overall literacy will likely correlate to higher levels of media literacy, but different approaches may be required for people with different awareness levels. As the consultation document outlines, more evidence is needed into the effectiveness of different types of inplatform interventions. This evaluation should</p>

also extend to the efficacy of interventions for different types of users, as far as this is possible.

Monitoring and Evaluating: While the principles listed within this subsection are worthy, these aspects cannot work well unless there are mandatory reporting frameworks, as we might see for financial or environmental data

User centric design and timely interventions: This principle requires a clearer definition of 'accessible'. For example, is this definition of accessible around the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018, or a wider term?

Comments on the specific principles:

1. While it is essential that services consider media literacy as part of their KPIs or OKRs, this alone is not adequate. Media literacy policies, Performance indicators and Objectives need a consistent approach. Allowing companies to set different measures makes it difficult for these to be compared and assessed. We need universal Performance Indicators and Objectives to compare companies' efforts and set universal and regulatable policy standards.
2. To enable online services to publish results about the impact of their media literacy interventions, a clear framework would be required to facilitate and standardise these reports.
3. Media literacy priorities need to be informed by experience of real people, not only stakeholders or experts with an interest in the subject matter. Online platforms need to be more proactive when collecting public opinion to inform media literacy priorities. This should include reaching out to schools, parent groups, older people's groups. While stakeholder engagement and expert voices should be listened to, it is paramount that media literacy priorities consider the needs of less vocal groups

	<p>and are transparent about the findings more proactive investigations reveal.</p> <p>4. <i>'The context in which people make decisions and the psychological factors that underpin decision making are considered'</i>- This comment lacks any information on how this principle will be achieved. A clearer layout on how to identify and cater to these contexts is required. There is no point in individual companies doing this in a vacuum, this is a national issue that needs addressed with a common understanding and common language.</p> <ul style="list-style-type: none"> - Tailored and specific support may also need to be provided for different age groups, as well as those with disability needs.
<p>Question 5: Do you have any further guidance/feedback to offer on how platforms can enact best practice media literacy by design?</p>	<p>Confidential? – N</p> <p>Platforms need to consider the fact that required digital skills for media literacy vary between devices. Online services vary between laptops and smartphones, for example. The planning and implementation process of media literacy by design principles needs to include a stage where the different requirements, dangers and difficulties of different devices are identified and catered for. While appreciating this is aligned to the duties on platforms to comply with the OSA, further consideration should be given to the role that Ofcom will play in promoting compliance with these principles considering that they are not legally binding.</p> <p>Best practice media literacy by design principles need to incorporate online safety measures. These may include automatic methods of filtering out content that may be or promote illegal or harmful behaviour without compromising freedom of expression.</p> <ul style="list-style-type: none"> - Equally, there need to be universal design standards across online services about facilities which allow users to report, flag and have dangerous or

	<p>inappropriate content removed, with proper action taken by platforms, which is not always achieved. These need to be clearly available across all online services. This not only ensures user safety but is essential to promoting media literacy through allowing users to think critically and regulate what they consume online.</p> <p>Platforms need to have a role embedding user understanding and awareness of how to stay safe</p> <p>Many of the key platforms have extensive experience in how to engage users in viewing content. They need to use these methods to engage them in education around media literacy – whether this is through behaviour science, gamification, etc.</p>
<p>Question 6: Can you submit any case studies or examples of different services enacting any of these best principles for media literacy by design? Can you provide any other examples of best practice media literacy by design that may not be covered by this document?</p>	<p>Confidential? – Y / N</p>
<p>Question 7: How do you expect in-scope services to demonstrate that they have adopted the principles? What would this look like?</p>	<p>Confidential? – N</p> <p>For this to take place, the principles need to be clearer with more common requirements to allow less interpretation. This is paramount to ensure online services can meet and demonstrate their adoption of these principles. There must be external reporting providing metrics and impact of interventions. Companies could then be presented with a method of auditing their own commitments akin to the Cyber Essentials accreditation, where certain criteria need to be met and demonstrated. Alongside this, there needs to be a method of raising concerns and complaints about companies who state that they meet the principles and fail to abide by them.</p>

Question 8: What more can be done to encourage services to promote media literacy by design?

Confidential? – N

There needs to be a method of raising concerns and complaints about companies who state that they meet the principles and fail to abide by them, or those who reject the principles entirely. This may require the existence of an external regulatory body

Clear criteria need to be developed for what essential standards exist. There need to be provisions for people to raise concerns about organisations who fail to meet requirements and clear sanctions for companies who fail to meet criteria.

Question 9: How do you envisage the proposed services in scope of this work, and in particular their design elements as they relate to the promotion of media literacy, changing and evolving within the next 5-10 years?

Confidential? – N

It is difficult to predict how media literacy rates will change in the next 5-10 years. It is likely, however, that digital tools will continue to proliferate into many aspects of life and work. It is also likely that the literacies and skills that people will need to keep up with new technologies will change. Media literacy criteria will not be set in a static state but will change over time as technology changes. Design elements will need to adapt in line with these changes. It is likely that the principles will remain broadly consistent but the types of content may not. New technologies pose new opportunities, but also new potentials for harm. Platforms will need to consider how they remain agile to respond to new harms and safeguard the user experience. The development of new and powerful AI applications along with the widespread adoption of augmented and virtual reality technologies are likely to modify the essential digital skills required for both life and work.

Equally, New technologies and platforms, AI and voice technology will present ever more sophisticated harms. Design elements will need