

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? – N</p> <p>Yes, to some degree, for online platforms. However, there needs to be a complex understanding of what counts as digital media, including the design, use, and affordances of the device/platform itself, as well as apps. The typology currently excludes hardware and software that, as our research has shown, can be used in tech-facilitated gender based violence and image based abuse. For example, what kinds of on-platform interventions can be used with potential AI-facilitated abuse? How are algorithms shaping media literacy of what people engage with and do not engage with?</p> <p>Echoing the Royal Society for Public Health’s ongoing Scroll Free September Campaign, our partners also voiced concerns about the more generalised ways in which the fundamental design of apps encourages ceaseless and addictive levels of engagement, thereby exacerbating other issues, which are more ephemeral than the interventions noted here. Amendments to the OSA have identified the need for research on the role of app stores in facilitating harm; however, we believe that the Bill has missed an opportunity to call for more safety regulation, digital media literacy, and intervention in an industry where policy is sorely lacking. Our recommendation is that such regulation is urgently needed, and can be enabled much earlier with evidence already available from within the research community.</p> <p>To read our report, see here.</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? – N</p> <p>The themes cover most of the main issues. However, the theme that distinguishes between media literacy and intervention needs to be</p>

	<p>clearer about the relationship. For us, these two are linked, and the design-stage of service providers' contributions should recognise their impact to wider society in a way that forefronts safety.</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? – Y / N</p> <p>Promoting such media literacy was a key recommendation of our report. While the OSA places greater onus on platforms and digital service providers to moderate harmful content, our analysis of the sector suggests that online safety and regulation needs to take a more proactive approach. This is recognised in the National Audit Office's report by noting the "statutory duty to promote media literacy so that the public become informed digital decision-makers and so can protect themselves and others against harmful content" (p.33). Based on our research, we suggest that individual protection (the user protecting themselves and others) also rests on challenging a wider culture of toxicity, including racism, homophobia, transphobia, ableism, sexism, and misogyny.</p> <p>The principles for media literacy by design currently elides a wide spectrum of online harms that are gender-related and target vulnerable adult populations including women and girls, at-risk men, adults with neurodiversity and/or mental health conditions, and those with other combined characteristics such as non-conforming gender and sexuality, as well as racial, ableist, and classist marginalisations. Violence against women and girls (VAWG) is not addressed.</p> <p>In our own terms, the means to fostering a 'critical media literacy' would include a commitment to increase users' capacity to interpret and evaluate information online and to make informed choices around both content consumption and appropriate online behaviours. It should also recognise the wider social structures and how they influence and shape harm in online spaces. Specifically, we recommend that digital literacy efforts be built into the design of services by mandating that service providers a) offer signposting for harm</p>

	<p>reduction and risk assessment strategies, and b) include literacy resources, toolkits and/or reporting mechanisms within their platforms. We also recommend that Ofcom incorporate multi-sector voices and perspectives into the three-year delivery plan for media literacy.</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? – Y / N</p> <p>The principles give a general outline of the areas that are will be addressed. However:</p> <ul style="list-style-type: none"> - The use of the word 'priority' could make clear what the priority is, as appears to leave it up to service providers' discretion. The specific amendments in the OSA proposes "measures that services can take to reduce the risk of harm to women and girls, and which demonstrates best practice", a suggestion that was made in our report when partners talked about providing examples of 'gold standard' digital infrastructure for addressing VAWG. - On the principle of user-centric design, our discussions with partners oriented around the use of safety-by-design approaches, including forms of co-design and co-production, which could usefully be drawn on in identifying best practice. Thus, our recommendations include that a) Ofcom should fully adhere to the VAWG Code of Practice, and b) ways of implementing 'safety-by-design' are explored in articulating measures that service providers can take to reduce VAWG.
<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>As reported by our partners:</p> <p>"What was needed was take-up of such practices and technological affordances, especially by larger companies like Google and Twitter. There was a sense that the tech industry knew there was a problem, but that they needed to implement innovative safety-by-design examples by other platforms to see the benefits. It was also recommended that there should be a mandating of clear process for online content to be removed, and of information sharing between platforms,</p>

	<p>including distributing examples of best practice or ‘gold standard’ affordances – and reflecting on the relative strengths and weaknesses of different tools and software.” (p.20)</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? – N</p> <p>Please see our report for a full discussion of case studies and examples from cross-sector voices concerned with: intimate digital health tools and services marketed to those who identify as women; image-based and technologically-enabled abuse; “toxic” internet communities; and protections for people with mental health conditions and neurodiversity.</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>This question is outside of the scope of the research we have done.</p>
<p>Question 8: What more can be done to encourage services to promote media literacy by design?</p>	<p>Confidential? – N</p> <p>Reportage of which services are taking seriously their commitment to users’ safety should be undertaken, and good practice needs to be shared across the sector. As recounted to us by our partners, this will ensure that interventions do not become only a matter of removing harmful content, but of preventing that harmful content existing in the first place.</p> <p>There also needs to be dialogue between interventions, media literacy, and reporting, regulations need to ensure that reporting is robust. Our partners noted that, especially in the case of gender-based violence, the act of reporting can have retraumatising effects. This is particularly the case when reporting mechanisms place exceptionally high thresholds on proving that harm or repeated harmful behaviour has taken place.</p>

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

As noted [in our research](#), the whole area of digital harms is fast evolving and thus digital media literacy and safety-by-design will have to be constantly adaptable. This includes taking into account manipulated images, AI-enabled harms, doxxing, forms of online fixated/obsessive behaviour, technologically-enabled public sexual harassment, or the growth of immersive technology (e.g. the 'metaverse'), as well as a range of apps and devices that facilitate abuse and that should foster media literacy and safety by design. This could include computer game consoles, smart home technology, GPS enabled devices, and wearable technology.

There is a need to acknowledge the dual role that AI might have in design elements, where AI is built on societies that are producing forms of sexism, misogyny, and gender-based violence – with AI harms and AI-facilitated abuse being a growing concern. This may reproduce inequalities shaped by protected and combined characteristics, censor non-normative bodies and identities, and may neglect protecting vulnerable groups. Equally, human intervention alone may be insufficient to deal with the volume of harmful content. A nuanced discussion of the centrality of AI within design interventions in media literacy will need to forefront such combined characteristics as a key concern to ensure a fairer and safer digital culture for all.