

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>Glitch agrees with this categorisation of on-platform interventions</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>Glitch recognises the point raised in the first theme where a trusted advocacy group highlights an issue and suggests an on-platform solution. Glitch’s Black Lives Matter Online Too campaign led to changed practices around video filters being placed over potentially disturbing content, in response to the Black Lives Matter protests and the video footage of the murder of George Floyd on social media platforms. While platforms are sometimes receptive to suggested solutions to issues as they arrive and at times quick to implement them, much harm is done by taking a ‘whack-a-mole’ reactive approach, rather than a more preventative one.</p> <p>Glitch believes in digital citizenship education and that media literacy is an effective driving force for behavioural change and intervention. Ofcom has the opportunity to promote this messaging to change attitudes toward media literacy and prevention as regulator of these platforms.</p> <p>However, we believe there is an omission or a lack of consideration of how media literacy more broadly can work to prevent systemic harms through behavioural changes of users, rather than only being brought in as a piecemeal intervention initiated to respond to specific issues by external actors. The concern here is that while external issues do require interventions, daily occurrences on platforms that may be commonplace – such as the prevalence of</p>

	<p>misogynistic content on platforms – as highlighted by Glitch’s Digital Misogynoir Report, can and should be addressed through media literacy which improves digital citizenship.</p> <p>We are concerned though not surprised by the lack of impact evaluation in relation to media literacy – without data showing the results of different media literacy interventions, or the overall benefits, platforms are missing crucial information when making key decisions on how they run their platforms. We think that the decision not to collect this kind of data indicates a relative lack of commitment to prioritising media literacy - if compared for example to the extensive data collected for the impact evaluation of various forms of targeted advertising. It would be incredibly beneficial if Ofcom’s guidance and regulation could influence platforms to include media literacy in how platforms measure success.</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>	<ul style="list-style-type: none"> • Confidential? – N <p>One area which we believe is missing in these headings is media literacy for navigating complex issues of race and gender. Forms of misinformation which reinforce racist and sexist tropes require racial and gender literacy. For example, Mutale Nkonde and others “urge tech companies to adopt racial literacy practices in order to break out of old patterns” to appropriately address misogynoir and other fronts of racism on platforms. Further to this, media literacy interventions could include context like misogynoiristic tropes – discussed at length in Glitch’s recent Digital Misogynoir Report – i.e. if a certain form of abuse is reinforcing/deploying misogynoir tropes. This report looks at how hateful tropes continue to be used to silence and harm Black women, but social media can also be used by and for Black women to challenge abuse and build community:</p> <ul style="list-style-type: none"> • We found over 9000 more highly toxic posts about Black women than white women in a data set which highlights the way that Black women are more likely to be racialised, i.e. referred to in reference to their race or ethnicity • Dehumanising language and stereotypes long critiqued within Black feminist scholarship – such as ‘the angry Black woman’ (‘Sapphire’), fetishisation (‘Jezebel’), and fatphobia (‘Mammy’) – are rife in digital spaces • The most prevalent misogynoir trope that was found was that of the ‘angry (fat) Black woman’ – an extremely harmful (and fatphobic) trope that often leads to both dismissal and tone policing of Black women’s voices in public discussions

	<ul style="list-style-type: none"> Despite this toxic misogyny, we also see the power and joy of Black online communities in how social media is used to challenge abuse and celebrate Black women which is shown in the relatively high rates of positive content about Black women <p>We believe it would be beneficial for further clarity on how platforms are expected to identify harmful behaviour.</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>What works well in the outlined principles is their design-led approach which would include media literacy from the early stages of product design.</p> <p>One area which we have identified does not work well is the lack of join up between media literacy by design and the successful implementation of the Online Safety Act. We have noticed that there is very little mention of media literacy in the current call of evidence on illegal harms in the Online Safety Bill, which feels like a missed opportunity to embed media literacy into the Codes of Practices for the regime. This is important both for the Codes of Practice applied to adult users, as well as protections for children. We believe media literacy should be included within Codes for all users, regardless of whether they relate to illegal content or for children the 'legal but harmful' content.</p>
<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>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>You may wish to consider the following case studies, which have all attempted to incorporate media literacy by design but faced various challenges in doing so:</p> <ul style="list-style-type: none"> Community notes on Twitter/X, which self-describe as 'Empowering users to create a better-informed world', are an interesting case study in empowering users to provide context. They are open source and data is publicly available at https://communitynotes.twitter.com/guide/en/about/introduction with further explanation of how they are 'a collaborative way to add helpful context to posts and keep people better informed.' <ul style="list-style-type: none"> Contributors write and rate notes Only notes rated helpful by people from diverse perspectives appear on posts

	<ul style="list-style-type: none"> ○ X doesn't choose what shows up, the people do ○ Open-source and transparent ○ It's possible through this webpage to sign up to become a Community Note contributor. ● YouTube's attempt to add Wikipedia links below conspiracies is interesting because it failed due to Wikipedia's objections that it led conspiracy theorists to flood Wikipedia pages https://www.cnn.com/2018/03/13/youtubewikipedia-links-debunk-conspiracy.html <ul style="list-style-type: none"> ○ YouTube stated that the intention was that this new feature would only be used on conspiracies that were causing 'significant debate' on the platform. ○ Reportedly, YouTube did not tell Wikipedia about its plans and Wikipedia has stated that this is not a formal partnership with either Wikipedia or Wikimedia
<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>One way would be through for services to provide reports with data on user engagement, especially compared to engagement with initial harmful context/misinformation</p>
<p>Question 8: What more can be done to encourage services to promote media literacy by design?</p>	<p>Confidential? – N</p> <ul style="list-style-type: none"> ● Incentivising platforms to routinely assess the impact of media literacy by design so they have the data to show the benefits ● Incorporate 'encouragements' into the Online Safety Act regime through Ofcom's role as regulator. ● Include media literacy by design as a crucial part of the response to both illegal and legal but harmful content
<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?</p>	<p>Confidential? – N</p> <p>In the next 5-10 year, we expect media literacy interventions to become more the norm in response to enormous need for support in navigating artificially generated disinformation in deepfakes.</p>