

Your response

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<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>N/A</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>The themes identified resonate with available evidence and experience, including insights emerging from other research on media literacy funded by Ofcom and by the Dept. of Science, Innovation and Technology through their respective programmes. Good Things Foundation also believes it is important to draw on insights from research (in progress) to develop a Minimum Digital Living Standard for households in the UK - and to consider (1) how the design of media literacy interventions can enable people to meet the Minimum Digital Living Standard - as there are elements within the MDLS which are relevant to media as well as digital literacy; (2) how the design of media literacy interventions can be shaped by and relevant to those who may be below the MDLS.</p> <ul style="list-style-type: none"> • The Minimum Digital Living Standard (MDLS) project is a proof-of-concept study establishing a nationally agreed benchmark for what 'good' looks like for households living in the digital age (2023). Parents and young people consulted on behalf of the study felt that households with children required a range of goods, services and skills to meet the Minimum

Digital Living Standard. This includes devices and internet connection as well as skills and knowledge. Media (and digital) literacy is associated with the skills necessary to meet the Minimum Digital Living Standard, especially the critical skills involved in 'understanding and managing digital risk' (alongside 'practical and functional skills' – such as using digital devices, programmes, and the internet and engaging online). The MDLS - as a household level benchmark focused on families with school-age children - also identifies the school ages / stages at which these skills become necessary. **We encourage Ofcom to consider the skills and critical understanding for children and adults identified within the MDLS and their relationship to each other when setting out principles for media literacy by design.**

- The Minimum Digital Living Standard is holistic - acknowledging that a person's digital capability is hugely dependent on their skills and motivation to safely, confidently navigate the online world as well as having the 'hardware' to do so (Stone, 2023; Dixon, 2022). **We encourage Ofcom to consider the holistic nature of MDLS and how media literacy by design relates to other aspects - including other (practical and functional) digital skills and literacy, as well as digital access (connectivity, devices).**
- The MDLS is not intended to be prescriptive, it instead establishes what people are likely to need to be able to reach a minimum but acceptable level of digital participation. Based on deliberative work with members of the public, the MDLS is defined as: 'A minimum digital standard of living includes, but is more than, having accessible internet, adequate equipment, and the skills, knowledge and support people need. It is about being able to communicate, connect and engage with opportunities safely and with confidence'. **Good Things Foundation**

	<p>encourages Ofcom and the online services following their principles to use the MDLS as a benchmark to assess policies, principles, and interventions.</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>N/A</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>N/A</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>Yes, platforms can enact best practice media literacy by design by prioritising people who are more likely experiencing digital exclusion.</p> <p>Good Things Foundation believes user-centric design and timely media literacy interventions need to have greater consideration for digitally excluded groups of all ages, prioritising them as key audiences, drawing on existing good practice content and acknowledging the wide range of demographics and circumstances. Ofcom should advocate for media (and digital) literacy education at an early age and also on an ongoing basis (i.e. lifelong learning).</p> <ul style="list-style-type: none"> Experiences of digital exclusion (including experiences of low to no media and/or digital literacy) are strongly correlated with social and economic exclusion and intersect with a range of characteristics including age, income, disability, geography, education attainment, language, and housing circumstance (Allman, 2022; Stone, 2023; see also Yates, et al. 2020; 2021) across all age groups. We encourage Ofcom and the platforms adhering to their principles to focus their media literacy by design interventions on those more likely experiencing digital exclusion and draw on content which points to what good

practice looks like (for example, see NHS England's recent resource: Inclusive Digital Healthcare: A Framework for NHS Action on Digital Inclusion, 2023).

- Good Things Foundation recognises that media literacy by design is vital, but only offers a partial solution to the issue of media (and digital) illiteracy and digital exclusion. Current interventions do not sufficiently address the responsibility for direct action of online services and platforms within the ecosystem, with too much emphasis still placed on individual users of online services to learn and take action - rather than platforms themselves taking action. **Good Things Foundation encourages Ofcom, online services, and platforms to recognise and address their responsibility to act as well as to educate or create learning opportunities, thereby reducing the burden of responsibility on individuals.**
- Many of the people we support need the very basic digital skills content such as that offered by Learn My Way to help them build media (and digital) literacy and support them online. Learn My Way is Good Things Foundation's flagship online learning platform, freely available to community and other organisations in the National Digital Inclusion Network - and designed for use mainly through supported, targeted interventions in communities with digitally excluded groups. Supporting media and digital literacy involves getting the balance right between encouraging people to use online services, while recognising the risks, so they can be more confident and empowered internet users (Good Things Foundation, 2023). An important outcome is to build the confidence and motivation to keep on learning. **Good Things Foundation encourages Ofcom to advocate for coordinated investment into media (and digital) literacy at both an earlier stage in schools, and on an ongoing basis - lifelong learning - valuing the role of informal, community learning within this.**

<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>N/A</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>N/A</p>
<p>Question 8: What more can be done to encourage services to promote media literacy by design?</p>	<p>Good Things Foundation believes that there is more to be done to encourage services to promote media literacy by design - particularly involving financial support and knowledge sharing:</p> <ul style="list-style-type: none"> • Sufficient and coordinated financial support for targeted interventions will still be required to improve media literacy for groups facing wider and deeper digital and literacy barriers. Yet the media (and digital) literacy sector is undermined by limited, shorter-term funding opportunities and lack of an overarching framework (DSIT with LSE, 2023). Good Things Foundation recommends Ofcom to continue to fund, and encourage or facilitate online services to fund targeted interventions alongside promoting media literacy by design as proposed in the consultation. • We also recommend Ofcom to continue to play a continuing role in gathering and sharing insights from evaluations of targeted media literacy interventions, and engaging online services with these insights to inform how online services can better develop their media literacy by design approaches.
<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>Good Things Foundation encourages that further consideration be given to media literacy by design in the context of digital exclusion, and rapid digital transformation - including the use of AI and generative AI - which risks widening and deepening the digital divide:</p>

- Media literacy is associated with digital skills and confidence, and there are low levels of media literacy (and relevant support) generally in the UK (DSIT with LSE, 2023). Rapid digital transformation continues to change the media (and digital) landscape, and digital exclusion is further exacerbated as people do not have the skills, confidence, critical understanding and digital access to keep up.
- For example, frontier technologies are necessitating people's greater need for an understanding of generative Artificial Intelligence and its role in our world. Additionally, there are deep concerns about the inherent bias in datasets of which AI depends, and digital exclusion compounds the invisibility already experienced by many underserved and underrepresented communities in datasets (Good Things Foundation, 2023b).
- **Good Things Foundation encourages Ofcom and relevant online services practising media literacy (and digital) literacy by design to keep up for date with the impacts of these changes on communities most at risk of being harmed or underserved; and to incorporate 'digital literacy' and 'AI literacy' as part of 'media literacy by design'.**

References

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- Department for Science, Innovation, and Technology with the London School of Economic 'DSIT with the LSE' (2023), [Cross-sectoral challenges to media literacy research report](#) - Edwards, L. et al.
- Good Things Foundation's Data Poverty Lab (2022), [Local communities and the internet ecosystem](#) - Dixon, K.
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- Good Things Foundation (2023b), [AI and the digital divide](#)
- Minimum Digital Living Standard (2023), [A UK Minimum Digital Living Standard for Households with Children: Interim report](#) - Blackwell, C., et al.
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- UK Parliament (2023), [Good Things Foundation - Written Evidence \(DCL0042\) for the House of Lords Communications and Digital Select Committee inquiry 'Digital exclusion and the cost of living'](#) - Stone, E.
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