Call for input: Principles for media literacy by design
January 2024
Response from Google

Introduction

Google and YouTube welcome this opportunity to respond to Ofcom's consultation on principles for media literacy by design.

We note that Ofcom defines media literacy as "the ability to use, understand and create media and communications in a variety of contexts". We have found that media literacy is an ever-evolving concept; it can encapsulate everything from on-platform activity that allows users to understand more about what they are seeing and why (sometimes called **information literacy**); offline partnership initiatives with the goal of making users better equipped with the skills and tools they need to navigate the online world safely and confidently (sometimes called **digital literacy**); and programmes which help users make informed decisions about the content and behaviours they encounter and create and the motivations behind them (the most conventional definition of **media literacy**).

At Google and YouTube, our mission is to organise the world's information and make it universally accessible and useful. Our approach focuses on information quality across our **products**, like Search and YouTube, whilst investing in off-platform **programmes** and **partnerships**. We have invested significant resources, from our systems to our teams, to develop what we believe is an industry-leading approach. We give consistent, detailed thought to how the search results or recommendations we make on our services point people to the highest quality, most authoritative information available. This is especially important when it comes to issues where users of all ages may be vulnerable to harm.

We value the importance of driving up information quality standards for users of all platforms and services and see first hand the difference this can make.

Principles

Priority, transparency and accountability: We agree with Ofcom's assessment that there is no one-size-fits-all approach to designing interventions, as every platform is designed differently. As the consultation also notes, no individual user is the same, so it is important to view media literacy as not just a "within product" effort, but must be complimented by off-platform initiatives, too: practical skills, nudges and alerts should be accompanied by behavioural and comprehension skills which cannot be learned on-platform alone - perhaps

going so far as to encourage a healthy scepticism when viewing online content. We recently ran a multi-year, multi-channel campaign to make parents aware of our safety tools (known internally as Find Your Balance, with adverts appearing on Channel Four, commercial radio stations, local and national publications and elsewhere). As part of this, we promoted 2022 research from Internet Matters which found that families who were able to discuss and debate their technology use were also more confident at staying safe online.

Safety: Our product features also encourage safety and empower users of all ages to browse and watch content without risk. For example:

- We have set the most private default upload settings on YouTube for users under 18 and enhance digital wellbeing through our policies.
- In the UK, the SafeSearch filter setting is the default for users that we believe are under 18. SafeSearch helps individuals or those supervising their devices manage access to unwanted explicit content in Search results.
- YouTube recently shared five core principles that we will adhere to in our work on creating a safer and more enriching environment for young people.
- We created YouTube Kids as a standalone app to offer a safer environment for children, ensuring that they have access to appropriate and educational content. In addition, YouTube recently announced product updates to further support teen wellbeing, including updating our systems to limit recommendations to teen viewers of content that may be okay to watch as a single video, but could be problematic for some teens if viewed in repetition, including social comparison or real-world social aggression content.

Off-platform initiatives: We take a proactive stance in online safety and digital skills. We engage in diverse partnerships to extend our reach and enhance our impact. This involves collaborations with educational institutions, industry experts, and regulatory bodies to deliver comprehensive and multi-faceted media literacy initiatives.

To encourage an understanding of this among our users, we have invested in a major, multi-year, multi-million pound collaboration with Parent Zone to create the Be Internet Legends (BIL) program. BIL is aimed at 7-11 year olds and seeks to make them "safe, confident explorers of the online world". The programme encompasses five pillars - Sharp, Alert, Secure, Kind and Brave - mixing practical safety skills with behaviours that encourage personal empowerment and good online citizenship. The curriculum was approved by the PHSE Association at its launch, alongside a wide range of schools, policy makers and international experts - since then it has evolved following feedback from schools and policymakers on where there is most need. This has involved new modules on wellbeing, personal data usage and age appropriateness.

The comprehensive programme consists of live assemblies - in person and online - a teaching pack and ample teaching resources, and wider support for parents, too. The BIL curriculum is mapped to both the RSE and the Computing strands of the national curriculum and meets all of the online safety teaching requirements providing a comprehensive teaching resource. It is also supported by the popular computer game Interland. We have previously commissioned IPSOS Mori to evaluate the impact of this work. This found that "following the Google training, children are twice as likely to show an improved understanding of internet safety than those who haven't received the training" and also that "understanding how to spot at least one clue that something may be suspicious, misleading or a scam online, increased threefold amongst children who received Google training". This was an important step in iterating our offer and providing valuable insights into the efficacy of our work - but it was also a resource intensive process which we are aware may not be available to smaller platforms.

Since its launch in 2018 we have trained over 9 million children across the UK and have reached over 80% of UK primary schools.

In addition, we have also invested in the following major resources:

- The Be Internet Citizens programme for secondary school pupils is designed to teach teenagers about media literacy, critical thinking and digital citizenship, with the aim of encouraging young people to have a positive voice online. First rolled out in 2017, in 2024 we will be looking again at our programme to ensure we are reflecting changes in technology, such as the advent of AI.
- The online YouTube series 'Reframe' reflects our dedication to building resilience to online harms.
- The Hit Pause initiative, which features fun, educational PSAs that teach viewers skills that allow them to use digital platforms like YouTube safely and responsibly.
- Other programmes like the Digital Garage programme and Google Career Certificates build general digital skills in the population.
- We have partnered with Public Libraries 2030 to develop a "Super Searchers" curriculum, which follows information literacy best practices, such as the SIFT method. This course – now also available online – has been scaled to library partners across the the UK, as well as elsewhere in the US, Europe, and Africa. It focuses on teaching information literacy skills via our in-product tools like About this result, About this image, About this page, and Content advisories for data voids. We've also expanded this work through News and Search to give users new ways to check images and sources online.

- Our new "Meet Leo" pilot programme is designed to help parents/guardians and educators learn about the latest parental tools and age-appropriate experiences available in Search, Lens, Maps and other Google products. We will gladly talk to Ofcom about this in further detail in due course.

Fact-checking: We also take an industry-leading approach to fact checking and promote efforts worldwide to counter misinformation and harmful content.

- In Google Search, we label certain articles that have been written by fact-checkers and have used the ClaimReview markup. This means that when a user searches for a query and the Search results page includes articles that are fact checking articles, we will label them as such (if they meet our eligibility and technical criteria). In order for an article to be eligible to display these "snippets" on the Search page, site publishers need to use ClaimReview markup so that we can detect that their content is a fact check and ensure they meet our eligibility criteria and technical guidelines, which are outlined here.
- Through our Google News Initiative, we also offer the product, Fact Check Explorer, which allows anyone to explore the Fact Check articles that are using the ClaimReview markup. We've also made available the Google FactCheck Claim Search API, where users can query the same set of Fact Check results available via Fact Check Explorer.
- On YouTube, we highlight authoritative sources and show users 'Developing news', 'Fact-Check' and 'Topical information' panels. In addition, we limit the visibility and prominence of borderline content or removing that which violates our policies.
- We are proud to support the $12m Global Fact Check Fund which we established in partnership with the International Fact Checking Network in 2022. With a significant proportion of fact-checking capability currently text-based, we are exploring how to expand capacity to video and other media forms on a global scale.

Transparency: We publish regular transparency reports and other material on a range of issues including content moderation and the frameworks underpinning our systems. This helps both external stakeholders and users understand our work and build trust.

- The How Google Search Works and How YouTube Works websites explain how our systems respond to user queries in clear and accessible language. They clarify how ranking functions, our policies on bias and revenue-sharing, and give users an overview of the rigorous testing processes that improve our products.
- We introduced the About this Result feature on Search to provide users with context and provide transparency and clarity. It is a tool designed to encourage information literacy and develop more accurate mental models for how search works. We built it with the goals in mind of forming more accurate understandings of Search & search

results; improving search skills; increasing trust and user confidence in Search & search results; and dispelling folk theories about how search results are returned.

- We also provide transparency around our search quality process, including how we use [both search quality ratings and algorithmic improvements](#) to inform search ranking. We publish publicly available [rater guidelines](#) – as well as a shorter, digestible [summary](#) of these guidelines – that describe in great detail how our systems intend to surface relevant and authoritative content.

Ofcom's principles for media literacy specifically call out the need for services to consider media literacy as part of their Key Performance Indicators (KPIs) or Objectives and Key Results (OKRs) and iterate them based on new findings and evidence. We agree with the thinking behind this recommendation, but are concerned that the complicated and varying definitions of media literacy can muddy the need for clear outcomes. Embedding media literacy in a prescriptive framework may, in fact, narrow an organisation's ability to innovate and think holistically. We would encourage Ofcom to keep the principles focused on outcomes. For example: at Google, information quality and user safety are both cornerstones in delivering our mission and multiple layers of our leadership and technical expertise is incentivised to work towards improvements in this area; is that the same as having a media literacy OKR? Could our mission statement itself ("to organise the world's information and make it universally accessible and useful") qualify as a commitment?

We also note the call to publish impact reports as widely as possible; we would encourage Ofcom to consider balanced transparency. Impact reports have an essential role to play, especially in larger initiatives and product trials, but a requirement to formally report on all projects is not only burdensome, it can also create a culture of risk-aversion. As technologies evolve, new approaches to media literacy must evolve with them, and so we therefore need to preserve a culture of innovation.

User centric design and timely interventions: We build safety into our products by design. Across our products and services, algorithms look for signals that indicate the expertise, authoritativeness, and trustworthiness of content so users find the most relevant, useful results.

The themes identified in the document broadly reflect the approach Google and YouTube take to a number of our interventions. A particular example would be our search boxes which appear at the top of a results page when users are searching for crisis terms. For example, our suicide self-harm was built originally alongside Samaritans, and was expanded to include the Shout textline following insights that younger people in crisis prefer to text rather than call.

YouTube has presented to Ofcom before about our "4Rs" framework, which guides our strategies in content management and user engagement and forms a significant part of enabling media literacy via elevating authoritative sources for news, and providing context so users can make informed decisions. We promptly **remove** content that violates our policies to ensure a safe online environment, **raise** authoritative voices to provide users with reliable and accurate information, our algorithms are designed to **reduce** the spread of misinformation and borderline content and we **reward** creators who produce high-quality, informative content that enriches our platform but also encourages a positive and informative online environment.

As new technologies emerge and as we introduce new products with generative AI, we want people to benefit from everything it has to offer, while also prioritising their safety. We're pleased to partner with expert organisations to promote and evaluate the responsible development of new generative AI tools.

- Together with Anthropic, Microsoft and OpenAI, Google launched the Frontier Model Forum, to ensure the safe and responsible development of frontier AI models
- The Raspberry Pi Foundation and Google DeepMind are building a global network of educational organisations to bring AI literacy to teachers and students
- We joined the Partnership on AI (PAI) Responsible Practices for Synthetic Media: A Framework for Collective Action
- We launched the 'Generative AI Literacy Guide' which addresses how generative AI works, its capabilities, limitations and tips to use it responsibly

We have also established a unit within Google called Jigsaw that explores threats to open societies, and builds technology that inspires scalable solutions. We apply our research, technology, and training to critical issues such as election integrity and violence against women online.

In particular, Jigsaw's work on [prebunking](#)[1] may hold unique advantages to limiting the harms from covert influence campaigns in the new generative AI world. Enabling individuals to spot common manipulative techniques can help them avoid falling prey to these tactics, regardless of the specific claims made. As new AI tools are rolled out, Google will be accompanying them with new media literacy tools and guides, which we will be delighted to share with Ofcom in due course.

We want to note that Ofcom's intentions for "in-depth understanding" and personalised, intuitive, media literacy interventions - requiring substantial data collection of users - present a challenge in the context of the ICO's Children's Code and the Online Safety Act, policies requiring minimal data collection. To navigate this effectively, Ofcom needs to strike a balance between the objectives of the Online Safety Act and the goals of driving greater information quality for individual users and vulnerable groups. We'd encourage Ofcom to develop frameworks that support innovation and user empowerment, without compromising on privacy and security. This will ensure user-centric design is not compromised by conflicting obligations and gives services much needed certainty to innovate responsibly.

Monitoring and evaluating: We value the importance of effective monitoring and evaluation in order to test and improve our products and overall information quality.

We gather feedback in multiple ways as part of our monitoring and evaluation, from A/B testing to surveying users to ask about new features. In 2022 alone we ran over 800,000 experiences which resulted in 4,000 improvements to Search.

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[1] Prebunking is a communication technique designed to build "mental antibodies" by helping audiences spot and reject future attempts to manipulate them. By forewarning people and equipping them to spot and refute misleading arguments, they gain resilience to being misled in the future. Google and Jigsaw have run several successful prebunking campaigns that have all resulted in positive recall of key concepts. These videos taught viewers to identify disinformation 2-10% more accurately, trust the disinformation messenger less, and share less disinformation. Jigsaw has run prebunking videos as ad campaigns to millions of people with partners to educate about common disinformation techniques and to build resilience against misleading narratives., e.g. an Indonesian prebunking campaign leveraging gameshow style quiz videos, local influencers, live events and offline media literacy trainings to highlight the importance of understanding attempts to manipulate audiences in the lead up to local elections. A German prebunking campaign launched with six local partners to help more than half the online German population to recognize common manipulation tactics online across topics. A series of animated videos produced in partnership with Universities of Bristol and Cambridge to show how techniques like fearmongering are used in manipulative messages. Videos on misleading anti-migrant narratives developed in cooperation with experts from Poland, Czechia, and Slovakia. These videos have reached over 15M people since the start of the war in Ukraine.

However, the suggestion in the consultation that interventions should be constantly "monitored for effectiveness and impact and then iterated" as well as conducting experimental A/B testing may be difficult for services to pursue in an increasingly regulated environment. For example, the definition of "significant change to the design or operation of your service" that is being suggested by the Ofcom's Online Safety Act draft risk assessment guidance (A5.97 and A5.132) means platforms could be required under the new regime to conduct risk assessments for every change to their media literacy interventions, which adds to the regulatory burden of such measures. Further, many smaller platforms are unable to conduct testing on this scale and so there is a risk that the bar of "best practice" is being set too high. Ofcom should recommend a proportionate and practical approach to monitoring and evaluation that incentivises platforms of all sizes to increase understanding of what does and doesn't work.

As noted above, our impact assessment of Be Internet Legends was important but came at a significant cost. We believe that it was a gold standard in this kind of media literacy assessment, but we are aware not all platforms are able to allocate resource at this scale. Similarly, whilst we have gladly shared the outcomes of the research with government, Ofcom and others, some aspects of this report were commercially sensitive, as is likely to be the case for other such reports. In order to protect our ability to innovate within the programme, we'd ask for assessments of the work to not be made available to a fully public audience.

This is not unique only to BIL. We recognise the legitimate need for scrutiny to understand how systems and services work. But without sufficient safeguards, external access can pose critical problems, undermine media literacy efforts and harm innovation. Sharing evidence of failures should theoretically support the development of robust interventions, but in practice it will compromise the integrity of products and services, with SMEs in particular vulnerable to reputational risk that could restrict investment. Ofcom should consider a proportionate approach that continues to ensure dialogue with the regulator is the primary route for evidence gathering who, in turn, communicates best practice.

Recommendations

In line with Ofcom's consultation themes and principles, we offer the following incremental suggestions to help further improve the Best Practice principles:

- **Taxonomy:** Developing a definition of media literacy terms that are relevant and resonant to all users is something that would benefit the whole sector. The MSOM team can provide a convening body to align goals and languages from different perspectives and better unite us behind a shared vision of what needs to be communicated and researched further.

- **Enhanced coordination**: Close collaboration between both Ofcom and DSIT's media literacy and online safety teams is needed to ensure complementary and cohesive efforts. There is a natural overlap of interests between media literacy and online safety efforts but platforms and services will be better able to deliver interventions through a clearer delineation of responsibilities and greater coordination between regulators and government.

- **Balanced transparency**: We recommend a balanced approach in transparency, considering the potential disincentives of excessive public information sharing that could impact platforms' innovations and investment . We welcome the initiative to share best practice and learnings with other services but note that publicising failures would act as a disincentive. Could the MSOM team pioneer ways to share learnings cross-sector without opening up companies to investor or media criticism?

- **Tailored interventions**: Interventions should be age-appropriate and tailored to various user groups, ensuring accessibility and benefit for all. This will need to take into account how platforms can achieve this, recognising the role played by data collection for personalisation.

- **Inclusive stakeholder engagement**: Continue to engage a wide range of stakeholders, including tech companies, educators, and civil society, to ensure comprehensive, practical, and inclusive principles.

We look forward to continued discussions and collaborations with Ofcom, contributing to the development of effective, user-friendly media literacy strategies. We will continue to work with Ofcom and policymakers to introduce new tools and measures that deliver the highest standards of information quality.