

About Internet Matters

Internet Matters is a not-for-profit organisation dedicated to supporting parents and professionals to keep children safe and well online. Half of parents have heard of us and almost 9-in-10 would recommend us. In addition to providing resources and support, we aim to share our expertise to help ensure that digital participation contributes positively to children's lives. For example, we sit on the Executive Board of the UK Council for Internet Safety (UKCIS), DSIT's Media Literacy Taskforce Steering Board and Ofcom's Making Sense of Media Panel.

Response to call for input on 'Principles for media literacy by design'

Key points

- **Internet Matters welcomes Ofcom's focus on promoting media literacy by design.** Our starting point is that keeping children safe and well online is a shared responsibility, and online services have an important role to play: not just by supporting (or signposting to) off-platform advice and guidance - despite the importance of this - but, also, by designing their platforms to maximise users' media literacy.
- It is vital that online services consider how to promote the media literacy of **children in particular**. This could require a different approach to the adult population, and tailored interventions for **children of different ages** (in line with the approach taken in the Age Appropriate Design Code). The importance of online services considering age-appropriateness **should be specifically called out in the principles**, as disabilities and accessibility needs are.

Comments on the three areas

Priority, transparency and accountability

- **We strongly support the focus on transparency**, including in relation to impact measurement, throughout the document. The lack of transparency around which features work, and in which contexts, is one of the most significant barriers to progress and needs to be addressed as a priority.
- The focus on communicating actions and impact with 'the widest community possible' is also welcome – although it would be helpful if this **specifically called out users of the service**, who should be able to easily access this information. Online services should consider how they can publicise information about their media literacy by design activity **alongside** their wider actions to support online safety (as required by the Online Safety Act) in a simple, user-friendly format – not requiring users to look at multiple documents or statements.

User centric design and timely interventions

- It is vital that media literacy by design is **age appropriate**: online services should provide tailored support for children, specific to the child's age where this is known. This is just as important as providing tailored support for users with disabilities and/or accessibility needs and should be **called out in principle 4**.
- **It is vital for research to guide work in this space, including user research.** But note that users (both adults or children) can **support** online services taking **greater action** on-platform to educate and empower users, whilst also finding specific incidents of experiencing friction, as a result of a media literacy intervention, to be **frustrating**. This is in part due to **existing norms and expectations** around online services having minimal friction. This should not be seen as a reason for online services to minimise their media literacy by design interventions, but to **do more work to explain to users why they are there** and to allow them time to bed in before changing their design or removing them.

- The focus on **independent scrutiny** in principle 7 is welcome, but this should have a wider purpose than minimising potential bias. Independent experts can play a **broader role**, e.g. in advising on how to make interventions more user-centric and inclusive. The broader role of independent expertise should be **reflected in principle 7 and/or elsewhere** in the principles.

Monitoring and evaluating

- As stated above, we strongly support the focus on **impact measurement** – and transparency around this.
- When measuring the impact of specific interventions, online services should aim to distil the **effectiveness for particular groups**, including **children**, rather than looking at users as a single group. This is vital to ensure that some users are not being left behind and that interventions are made more inclusive and user-centric over time.