

making communications work for everyone

Your response

| Question | Your response |
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| 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). (a) Do you agree with this categorisation of on-platform interventions? (b) If not, please explain. | Y / N The existing examples are all valid but I would suggest adding badges and/or other forms of user feedback. |
| 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? | Research demonstrates that users often rely on default settings when it comes to protecting their privacy and safety online. Platforms have a responsibility to ensure defaults are set to the highest privacy and data security protections (es- pecially for users under 16 years of age). Defaults should also be considered in principle 5, to ensure that media liter- acy-promoting features are not add-ons or reserved for "power users" but are part of the expected use of the platform. The integration and promotion of media literacy training and skills development would also ensure that users expand their knowledge and practices regarding privacy and data security protections. Interventions may not be used for their intended purpose. For example, Medi- aSmarts' (2023) research on disinfor- mation on online platforms found that pop-up features meant to allow users to ignore content such as irrelevant ads were also being used to ignore mis and disinformation on those platforms. As a result, this mis/disinformation was not being flagged to the platform. Along with benchmarking or metrics of success for platform interventions there is a need for greater transparency about |

| | the changes to platform defaults/structures and why those changes were made. 5) Like what was found with MSOM's qualitative research with young Canadians also found calls for digital media literacy built-in to the platform's experience. Participants called for these learning/educational opportunities to be part of the 'vibe' of the platform. |
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| Question 3: Are we missing anything with the three headings used to structure the best practice principles for media literacy by design? | Accessibility (e.g. Tools and interventions should be upfront, visible, easy to use and accessible to users.) Accessibility is brought up within some of the specific principles, but it is worth highlighting within a heading. |
| 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)? | It is unclear how stakeholders, especially users, will be included in the accountability and meas- urement processes. It is mentioned within the design principles but a best practice principle re- garding maintaining regular, ongoing feedback with users ought to be developed to encourage platforms to build this into their accountability and measurement practices as well. |
| | Relating to principles 9-12, the challenges of measuring critical and informed use of media should be acknowledged. While there may be some cases where simple behaviour change is warranted (such as prompting users to check sources or read fact-checks before sharing) there will be more cases, such as body image, stereotyping and advertising, where it will be difficult to measure impact based simply on what users <i>do</i> and where attempts to modify their behaviour run a strong risk of falling into protectionism rather than fostering critical thinking. |
| Question 5: Do you have any further guidance/feedback to offer on how platforms can enact best practice media literacy by design? | Platforms should be encouraged to work with and consult experts in media literacy research, education, and program design. Many platforms do not have this expertise in-house and certainly don't have localized, contextualized knowledge and expertise. Working with experts will be criti- cal to supporting those gaps. |

| 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? | Reporting Platforms: Young Canadians Evaluate Efforts to Counter DisinformationRecommendations for Platforms: Empowering Young Users to Push Back Against Hate OnlineProsocial Design Network - InterventionsHow Would Kids Design a Social Networking App That Supports Their Digital Citizenship?Prototyping for Social Wellbeing with Early Social Media UsersRewired: How digital technologies shape cogni- tion and democracy |
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| Question 7: How do you expect in-scope services to demonstrate that they have adopted the principles? What would this look like? | Quarterly reports to OfCom (made publicly avail- able) on their progress in meeting the principles of media literacy by design as well as quarterly updates on their measurements. |
| Question 8: What more can be done to encourage services to promote media literacy by design? | No further response. |
| 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? | There is a likelihood of an increased need for al- gorithmic and Artificial Intelligence literacy to in- crease significantly within the next 5-10 years. |