Your response

Question	Your response
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.	We think that this typology of on-platform interventions (including labels, overlays, prompts/pop-ups, notifications, and resources) may be helpful for encouraging users to engage in media literacy practices to some extent. This may include encouraging users to read additional information before judging the veracity of online content or know how to report instances of online abuse. However, we are sceptical about the breadth of this typology and about the type and reach of media literacy provision that platforms may be able to promote through these interventions. More specifically: 1. We worry that these interventions will not do enough to promote the **critical dimensions** of digital literacy (understood as part of wider media literacy that requires users to develop both *functional* and *critical* skills and knowledge about digital technologies). *Functional digital literacy* refers to the skills and knowledge necessary to use digital technologies practically. *Critical digital literacy* refers not only to the ability to assess the trustworthiness of online content but also to knowledge of the digital environment, both in terms of how internet corporations operate and in relation to the potentials and limitations of the internet for society and democracy (Polizzi, 2020, 2021). The interventions proposed above may encourage users to develop functional skills and knowledge (e.g., in terms of knowing how to practically raise a complaint or report something) and to potentially reflect on the veracity of information (e.g., through prompting users to compare and contrast information across multiple sources).

However, we think that these interventions will be ineffective in developing users' critical understanding of the broader digital environment. This will be particularly the case in terms of the risks that are inherent in how internet corporations operate in relation to issues of privacy, data, economic surveillance, algorithms, and filter bubbles. It is unlikely that internet corporations will have an interest in developing users' critical understanding of how the business models of these corporations present risks for users and, as exemplified by the [Cambridge Analytica](#) scandal, for democracy and society at large.

2. We worry about the process through which internet corporations will decide what sources may be used to present users with options in terms of comparing and contrasting online content across multiple sources. The development of citizens' critical ability to navigate information is a task that should lie primarily with the education system and pedagogy. To what extent can we expect platforms to act as educators, given their own economic interest and priorities?

3. We worry that the interventions proposed above will feed into the practices and behaviours of specific segments of the population (as in the case of those who already possess a baseline level of functional digital literacy), but not the overall population, thus reinforcing pre-existing gaps in terms of digital access and skills.

4. More specifically, we worry that these interventions will not meet the needs and prioritises of the most vulnerable and marginalised within society, which research shows tend to be those who are most likely to experience poverty not just online (i.e., in relation to their access to and use of digital technologies) but also offline (Yates et al., [2021](#), [2020](#)).

5. We worry that the interventions proposed above will ultimately place

	responsibility on the individual user in terms of identifying and coping with online harms such as misinformation and online abuse. As specified in the Online Safety Act and in the Online Media Literacy Strategy, Ofcom does not have a duty to regulate platforms online content, but is tasked with the job of monitoring the extent to which platforms are taking action to tackle harmful content. The risk of promoting media literacy by design through the interventions proposed above is that the onus of dealing with harmful content lies ultimately with the individual user.
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?	1. We agree that both specific and general media literacy interventions are often initiated in response to broader issues and crises (e.g., pandemics, wars), with individuals, advocacy groups and policymakers responding to these issues and crises at specific times. This is, we argue, a material reality that, by implication, indicates a lack of overarching framework for media literacy in the UK.
	2. We do not have sight of internal platform approaches to the promotion of media literacy but argue very strongly that, unless these are multi-disciplinary (cross-functional) interventions with a much greater social science input than is often the case, they are unlikely to be as successful as hoped.
	3. It is clear that media literacy behaviours are desired outcomes from platform interventions – often functional (see above) and focused on individuals reducing their own risks. We see much less appetite for platforms changing business practices or investing in significant internal activity to reduce harm at source – we note that X (Twitter) has massively reduced such internal teams.
	4. We agree that platforms should have supporting users' media literacy as a key commitment. But we also argue that

they should do so with a view to enabling users to develop and deploy the skills, knowledge and understanding required to participate in society as digital citizens (see Isin & Ruppert, 2020), **not** just so that they can make use of the opportunities presented by these services. We believe that, in regulating platforms, Ofcom should push them to focus on this digital citizenship aspect, and not simply to support users to be better consumers of digital services.

5. We agree that impact assessment is patchy and predominantly focuses on functional rather than critical digital skills. It also tends to be focused on individuals and does not look at wider, social, economic, political, community or cultural impacts of interventions.

6. Platforms do vary but many issues are common to all. Platforms should not be allowed to use claims of difference to resist broader general solutions.

Question 3: Are we missing anything with the three headings used to structure the best practice principles for media literacy by design?	The principles outlined in the call include 1) priority, transparency, and accountability; 2) user centric design and timely interventions; and 3) monitoring and evaluating.
	In relation to principle 1, we think that, while it is essential that platforms commit to being transparent about the actions they take to tackle harmful content and about the impact of their media literacy interventions, more clarity is needed as to the kind of actions that will be taken (e.g., by Ofcom) if they fail to be transparent or to implement adequate or impactful interventions.
	In relation to principle 2, we agree that the interventions designed and implemented should be user centric. However, more clarity is needed as to the extent to which these interventions will be designed in ways that are inclusive, as in reflecting the needs and priorities of different segments of society, including vulnerable groups such as people with disabilities and elderly people.

	In relation to principle 3, while we think that it is essential that the interventions designed and implemented will be tested and evaluated, more clarity is needed as to the extent to which tests and evaluations will be conducted in line with the most rigorous ethical principles of research. In addition, more clarity is needed as to the types of measurements that will be adopted, their reliability, and whether they will be used longitudinally so as to maximise the validity of results.
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)?	Please see our response to question 3 above for details about the areas relating to the proposed principles that need more clarity.
Question 5: Do you have any further guidance/feedback to offer on how platforms can enact best practice media literacy by design?	At the University of Liverpool, together with researchers from the University of Loughborough and non-academic partners, we have developed the Minimum Digital Living Standard (MDLS) (Blackwell et al, 2023). The MDLS is an instrument that measures the extent to which households with children are digitally included or excluded in UK society. Importantly, the MDLS is based on a consensus deliberative definition – developed by households and members of the public – of the minimum requirements of a household in terms of access to digital devices and both functional and critical digital skills. As such, the MDLS is a comprehensive instrument that spells out what households need in the UK in order to live an adequate life in the digital age. We recommend that platforms take into account the comprehensive list of digital skills outlined in the MDLS with a view to designing and implementing media-literacy-by-design interventions that tap into those skills as closely and comprehensively as possible.
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	We do not have specific case studies, but we have outlined some of the issues and challenges around best interventions in recent reports – see, for example, Yates & Carmi, 2022.

of best practice media literacy by design that may not be covered by this document?	
Question 7: How do you expect in-scope services to demonstrate that they have adopted the principles? What would this look like?	The in-scope interventions outlined in the call (labels, overlays, prompts/pop-ups, notifications, and resources) should align with the principles of 1) priority, insofar as the promotion of media literacy by design should be one of the priorities that platforms have in terms of tackling harmful content online (although not the only priority – see our response to question 8 below); 2) user centric design, since the interventions adopted should be designed in ways that are user centric and, as argued above, inclusive (see our response to question 3 above); and 3) monitoring and evaluating, as these interventions should be adequately and rigorously tested and evaluated (see our response to question 3 above).
Question 8: What more can be done to encourage services to promote media literacy by design?	Internet platforms should be encouraged to work closely with educators so as to promote media literacy by design in ways that are grounded in existing pedagogical efforts. It would also be helpful if, in doing so, platforms adopted comprehensive frameworks that focus on the wide range of both **functional and critical** digital skills that users need in order to use digital technologies both safely and with a view to participating in society. As suggested in our response to question 5 above, an instrument that can come in handy here is the Minimum Digital Living Standard (Blackwell et al, 2023).
Question 9: How do you envisage the pro-posed 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?	Even though we welcome the objective of promoting media literacy through the design of services provided by platforms, such an objective should not be seen in isolation from other priorities that both policymakers and Ofcom have in relation to promoting media literacy more broadly. This is particularly the case in terms of ensuring that more consistent funding opportunities are provided to civil society organisations delivering media literacy provision on the ground. Our own research shows that organisations often struggle to secure

government funding, which, as also found by others (e.g., Edwards et al., 2023), is largely limited and short-term (Polizzi et al., forthcoming). Media literacy also needs to be promoted more robustly through the school curriculum (Polizzi & Taylor, 2019). Finally, there is an urgent need to create a unified and cohesive framework for promoting media literacy in ways that can enable better coordination of and communication around provision across the different regions and nations of the UK (Polizzi et al., forthcoming).