

Your response

Question	Your response
<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>Whilst these are interventions identified as used within existing online services, the impact and efficacy of intervention needs also to be considered:</p> <ul style="list-style-type: none"> • User Experience Disruption: Frequent or poorly timed interventions (like pop-ups or notifications) can disrupt the user experience, leading to irritation and disengagement. • Effectiveness Over Time: Repeated exposure to the same type of intervention may reduce its effectiveness as users become desensitized. • One-Size-Fits-All Approach: These interventions might not consider the diverse needs and contexts of different user groups, leading to reduced effectiveness for certain demographics. (see below comment on differentiation) • Clarity and Relevance: The information provided must be clear, concise, and relevant to the user's current activity or context. Overly complex or irrelevant information can lead to confusion or neglect. • Privacy Concerns: Interventions based on user behaviour or actions may raise privacy concerns, especially if they are perceived as overly intrusive or if the data collection methods are not transparent. • Overdependence on Technology: Solely relying on these interventions may overlook the importance of broader educational strategies and human moderation in promoting media literacy. <p>These interventions also are one directional; they focus on content consumed by the user</p>

	<p>from the service provider. As generative AI becomes more powerful and democratised, there needs to be some way of addressing/flagging/informing content created by the user through use of these services e.g. the creation of potentially harmful content.</p> <p>This is an emerging component of media literacy that is not currently being effectively addressed (Ref: Report: IWF research into how artificial intelligence (AI) is increasingly being used to create child sexual abuse imagery online).</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>No mention is made in the summary of themes about matching the media intervention to user need. We know that platforms are very effective at using algorithmic feedback and monitoring to serve new content matched to user behaviour. Interventions could be more effective if a similar feedback loop is used...particularly one that monitors age (through soon-to-be-mandatory age-assurance mechanisms) and associated vulnerabilities.</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>As you identify, it's a starting point without flooding the standards with too much detail.</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><u>Priority, Transparency and Accountability</u></p> <p>Implementation Complexity: Smaller platforms may struggle with the resources and complexity involved in integrating a media literacy policy.</p> <p>Measuring Impact: Defining clear, effective metrics for measuring the impact of media literacy interventions can be difficult due to its multifaceted nature.</p> <p><u>User centric design and timely intervention</u></p> <p>Timing of Information Delivery: Determining the optimal time to provide information relevant to users' actions requires a delicate balance to avoid overwhelming or annoying the user.</p> <p>Continuous User Engagement: Ongoing engagement with users post-implementation to adapt to changing needs and feedback is critical but not explicitly mentioned.</p>

Cultural and Language Diversity: Addressing the needs of users from different cultural and linguistic backgrounds is essential for truly inclusive design but may not be sufficiently emphasized.

Privacy and Security: Ensuring that user-centric design also prioritizes user privacy and security, especially when collecting feedback and data for improvement.

Scalability: Strategies for scaling interventions to accommodate growing user bases and evolving platform functionalities.

User Education: In addition to intuitive design, there's a need for explicit user education efforts to improve digital literacy and platform understanding.

Monitoring & Evaluation

Resource Constraints for Smaller Services: Robust testing like A/B testing may not be feasible for smaller platforms due to resource limitations. Relying on observation and self-reporting may not offer the same level of insight.

Measuring Long-Term Effects: Assessing the long-term impact of interventions can be challenging, especially when immediate behaviour changes may not accurately reflect long-term understanding or habits.

Causal Relationship Establishment: Establishing causal relationships between interventions and behaviour changes may require sophisticated research methodologies beyond the reach of many services.

Standardized Metrics Across Platforms: Developing and agreeing on standardized metrics for benchmarking across different services is challenging due to the varied nature of platforms and their user demographics.

Data Privacy and Ethical Concerns: Rigorous monitoring and evaluation processes must balance the need for comprehensive data collection with user privacy and ethical considerations.

Question 5: Do you have any further guidance/feedback to offer on how platforms can enact best practice media literacy by design?

Cultural and Contextual Relevance: The proposals might not sufficiently emphasize the need to consider cultural and contextual differences in both the design and evaluation of interventions.

This is particularly important when creating a set of UK standards and the cultural and political differences across all four nations should be considered.

Interdisciplinary Approach: Engaging experts from various fields (like psychology, education, data science) in the evaluation process can provide more holistic insights but is not explicitly mentioned.

Adaptability to Technological Changes: Addressing how evaluation strategies can adapt to rapid technological changes and evolving user behaviours is crucial, particularly the ascent and adoption of generative AI

Collaborative Learning and Sharing: Encouraging a culture of collaborative learning and sharing best practices across platforms, including what didn't work, can be instrumental in advancing media literacy.

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?

Question 7: How do you expect in-scope services to demonstrate that they have adopted the principles? What would this look like?

Regular Updates: Providing ongoing updates about the implementation and effectiveness of the principles, showcasing continuous improvement.

User Engagement and Transparency: Actively involving users through feedback channels and being transparent about how this feedback influences policy and design.

Collaborative Initiatives: Participating in collaborative efforts with other services, experts, and stakeholders to share and learn best practices.

	<p>Independent Validation: Submitting to independent audits or reviews to authenticate the effective application of these principles.</p>
<p>Question 8: What more can be done to encourage services to promote media literacy by design?</p>	<p>Legislation and Compliance: Implementing regulations that mandate media literacy initiatives as part of service offerings, with clear guidelines and compliance requirements.</p> <p>Financial Incentives: Offering tax breaks, grants, or other financial incentives to services that successfully integrate media literacy into their design.</p> <p>Recognition and Awards: Establishing awards or recognition programs for services excelling in media literacy promotion, enhancing their reputation and market appeal.</p> <p>Funding for R&D: Allocating funds specifically for research and development in media literacy, encouraging innovation in this area.</p> <p>Pilot Programs: Supporting pilot programs that experiment with new ways of integrating media literacy into service designs.</p> <p>Media Literacy as a Value Proposition: Encouraging services to view media literacy not just as a compliance requirement but as a core value proposition that can attract and retain users.</p>
<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>These interventions also are one directional; they focus on content consumed by the user from the service provider. As generative AI becomes more powerful and democratised, there needs to be some way of addressing/flagging/informing content created by the user through use of these services e.g. the creation of potentially harmful content.</p> <p>This is an emerging component of media literacy that is not currently being effectively addressed</p>