

Your response

Question	Your response
Do you have any comments on our proposals?	Yes - please see below Confidential? – N

About Full Fact

1. Full Fact fights bad information. We're a team of independent fact checkers, technologists, researchers, and policy specialists who find, expose and counter the harm it does.
2. Bad information damages public debate, risks public health, and erodes public trust. So we tackle it in four ways. We check claims made by politicians, public institutions, in the media and online and we ask people to correct the record where possible to reduce the spread of specific claims. We campaign for systems changes to help make bad information rarer and less harmful, and we advocate for higher standards.
3. Full Fact is a registered charity. We're funded by individual donations, charitable trusts, and by other funders. We receive funding from both Facebook and Google. Details of our funding can be found on our website.
4. We are a member of Ofcom's Making Sense of Media Advisory Panel which brings together experts to debate and inform the development of Ofcom's media literacy research and policy work.

Comments on Ofcom's proposed plan of work 2022/23

Preparations for regulating internet services

5. Although the plan of work acknowledges that Ofcom needs to continue preparations for the new online safety regime, there is limited detail about how exactly Ofcom plans to do that over the next year.
6. If Ofcom is to hit the ground running as an effective and proactive online regulator it will need to start preparing to implement the regime imminently, including taking a number of formal steps. For example, consulting on the codes of practice that Ofcom will have to issue as part of its new responsibilities.
7. Although these new functions are unlikely to kick in during the 2022/23 financial year, it seems certain that a heavy amount of that preparatory work will fall within the period covered by this plan of work. It would therefore have been useful to have more detail about that preparatory work now, including a clearer timetable of forthcoming steps.
8. However, we welcome the commitment to publish a document setting out further detail on this during the first quarter of the 2022/23 financial year. Ofcom must use that as an opportunity to more clearly set out how Ofcom plans to organise itself to be an effective, front foot regulator of internet services, and the preparatory steps it will be taking in the lead up to Ofcom assuming those new responsibilities.

Media literacy

9. We see media literacy as a key tool for tackling problems in our information environment and believe that the new regime presents a huge opportunity to transform media literacy in the UK for the digital era.
10. As well as Ofcom's new role regulating internet companies, the Online Safety Bill will impose a new duty to promote media literacy; replacing Ofcom's existing media literacy duty by expanding and strengthening its scope and applying it more specifically in relation to online safety.
11. Although the plan of work, and Ofcom's recent document on the approach to online media literacy, acknowledge this forthcoming change - there is limited explanation of what Ofcom plans to do in relation to that revised duty. The latter in particular focuses primarily on Ofcom's existing powers rather than what Ofcom will do differently in pursuit of the revised duty, or how it will tie in with the regulator's wider powers and responsibilities under the Bill.
12. Full Fact believes that if an enhanced media literacy is to play a key role in addressing risks of online harms, including issues of misinformation and disinformation, then a much greater commitment of resources (and a leveraging of resources from others) is going to be needed. That will require Ofcom to step up its efforts in this area and ensure a clear prioritisation of resources to help it do so effectively.
13. As noted above, we welcome Ofcom's intention to set out its plans for taking on new responsibilities under the Online Safety Bill during Q1 of the 2022/23 financial year. Ofcom must use that as an opportunity to clearly and publicly explain how it intends to improve media and information literacy in the UK, including the outcomes against which it will measure progress (on areas such as building UK citizens' resilience to misinformation and disinformation). This will mean setting out what steps Ofcom will take to prepare for the revised new media literacy duty under the Bill, and crucially, the resources it plans to allocate to delivering on that duty in the near future.

Full Fact

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