

## Advertising Association and Media Smart response to Ofcom’s “A Positive Vision for Media Literacy” consultation.

### Introduction

1. This document presents the joint response from the Advertising Association and Media Smart to Ofcom's consultation on its proposed three-year media literacy strategy titled "A Positive Vision for Media Literacy." The Advertising Association is the leading tripartite industry body representing advertisers, agencies and media across the UK, while Media Smart is its award-winning non-profit organisation dedicated to media literacy education for young people aged 7-21.
2. As key stakeholders deeply invested in promoting responsible advertising practices and equipping the next generation with critical media literacy skills, the Advertising Association and Media Smart welcome this opportunity to provide feedback on Ofcom's proposals. It is our aim to contribute constructively to the development of a comprehensive and effective media literacy strategy for the UK. We believe that in developing the key skills of media literacy – resilience, empathy, creativity, communication and critical-thinking – young people are also building life skills which will help them on their journey towards future employability and well-being and equip them to be successful global citizens.
3. If you have any questions related to this submission please contact both [konrad.shek@adassoc.org.uk](mailto:konrad.shek@adassoc.org.uk) and [mediasmart@adassoc.org.uk](mailto:mediasmart@adassoc.org.uk).

### Question 1: Do you agree with our proposals in the section? Please explain your reasons and provide any relevant supporting evidence.

4. We broadly agree with the proposals outlined in Chapter 2 regarding Research, Evidence and Evaluation. Ofcom's long-standing commitment to robust research and evidence-gathering is commendable, and it provides a strong foundation for developing effective media literacy initiatives.
5. The proposed expansion of research samples to enable more detailed analysis of different user groups is a critical step. As the media landscape evolves, it is essential to understand the unique experiences, challenges, and needs of diverse audiences, including those disproportionately affected by online harms. This approach aligns with the principles of inclusivity and equitable access to media literacy resources.
6. Furthermore, the focus on understanding "what works" in media literacy delivery and sharing best practices is valuable. By evaluating the effectiveness of interventions and disseminating these insights, Ofcom can empower organisations and stakeholders to develop and implement more impactful programs tailored to their target audiences.
7. We would, however, caution against turning media literacy into a catch all term for addressing all types of online harm. Media literacy is commonly defined as “the ability to

access, analyse, evaluate and create messages across a variety of contexts”<sup>1</sup>. This can be broken down further into a four-component model:

- a) Access: The ability to find and utilise media content and tools in an informed and discerning way.
  - b) Analysis: An understanding of the agency, categories, technologies, languages, representations and audiences for media.
  - c) Evaluation: Critically assessing the credibility, accuracy, and value of media messages by questioning their sources, evidence, and potential effects.
  - d) Creation: Producing media content ethically and effectively to express ideas and participate as an active citizen.
8. This definition of media literacy is an important consideration in the context of the research objectives described under Goal One. We agree that media literacy has an important role in addressing the challenges of mis- and disinformation – there is a considerable amount of academic literature that can attest to this. We would also suggest that the research focus in this area could be expanded to include furthering the understanding of epistemic bubbles and echo chambers as these can create fertile ground to seed mis and disinformation especially when such groups receive information that aligns with their beliefs. Not only do they become vectors for spreading mis- and disinformation, it is the self-reinforcing nature of groups formed from epistemic bubbles and echo chambers that can move them toward arguably more extreme and dangerous viewpoints<sup>2</sup>. These phenomena have obvious implications for media literacy and its efficacy, but it may also extend beyond the bounds of media literacy and intersect with other types of literacy such scientific literacy<sup>3</sup>.
9. Whilst combatting online misogyny is an important policy goal, we must be mindful to the fact that the literature on using media literacy to address this type of harmful activity is very limited. There is certainly merit in teaching students or adults to identify misogyny being perpetuated online, especially online influencers who promote misogyny and to understand the issues and risks around this topic. Often the entry point to such content can be, at face value, superficial but it can lead to unhealthy engagement<sup>4</sup>.
10. However, the reasons for why individuals participate in misogyny can be complex. To illustrate this point further, a government commissioned research<sup>5</sup> found that incels, a sub-culture community of men who “forge a sense of identity around their perceived inability to form sexual or romantic relationships”, typically displayed extremely poor mental health, with high incidences of depression and suicidal ideation. Incels also perceived high levels of victimhood, anger and misogyny. As such, any media literacy initiatives aimed at combating online misogyny should receive input from experts in gender studies, psychology, and related fields. Merely raising awareness or teaching

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<sup>1</sup> Livingstone, S. (2004) What is media literacy? *Intermedia*, 32 (3). pp. 18-20. Available from [https://eprints.lse.ac.uk/1027/1/What\\_is\\_media\\_literacy\\_%28LSERO%29.pdf](https://eprints.lse.ac.uk/1027/1/What_is_media_literacy_%28LSERO%29.pdf)

<sup>2</sup> Diaz Ruiz, C., & Nilsson, T. (2023). Disinformation and Echo Chambers: How Disinformation Circulates on Social Media Through Identity-Driven Controversies. *Journal of Public Policy & Marketing*, 42(1), 18-35. <https://doi.org/10.1177/07439156221103852>

<sup>3</sup> Rosenthal, S. (2020) Media Literacy, Scientific Literacy, and Science Videos on the Internet. *Front. Commun.* 5:581585. doi: 10.3389/fcomm.2020.581585

<sup>4</sup> PSHE (n.d.) Addressing misogyny, toxic masculinity and social media influence through PSHE education. Available from <https://pshe-association.org.uk/guidance/ks1-5/addressing-misogyny-toxic-masculinity-and-social-media-influence-in-pshe-education>. [Accessed 5 June 2024].

<sup>5</sup> Whittaker, J., Costello, W., & Thomas, A.G. (2024). Predicting harm among incels (involuntary celibates): the roles of mental health, ideological belief and social networking. Available from <https://www.gov.uk/government/publications/predicting-harm-among-incels-involuntary-celibates/predicting-harm-among-incels-involuntary-celibates-the-roles-of-mental-health-ideological-belief-and-social-networking-accessible>. [Accessed 5 June 2024].

identification skills may not be sufficient; a holistic approach that fosters empathy, critical thinking, and a deeper understanding of the societal roots and impacts of misogyny is likely required.

11. Similarly, fostering data and privacy literacy presents unique challenges that may be difficult to address fully through the proposed strategy - data and privacy literacy is a demanding media education task in its own right<sup>6</sup>. These concepts can be complex and abstract, requiring specialised knowledge and continuous education to keep pace with rapidly evolving data practices and technologies. We encourage Ofcom to consider dedicated initiatives or partnerships focused specifically on enhancing data and privacy literacy, complementing the broader media literacy efforts outlined in this strategy.
12. Collaborating with experts in data privacy, cybersecurity, and digital rights could provide valuable insights and resources to effectively communicate these critical issues to diverse audiences. For example, Media Smart's 'Manage Your Online Advert Experience'<sup>7</sup>, features a three-minute animated film and classroom resources to support 13-16 year old students to discuss what is interest-based advertising, why it exists and how can young people best manage it.
13. This resource has been designed to support PSHE curriculum for living in the wider world with media literacy and digital resilience. More specifically, it builds on the PSHE programme of study examining how data may be used with the aim of influencing decisions, including targeted advertising and other forms of personalisation online, and strategies to manage this.
14. Whilst it is important to increase awareness of data and privacy, it needs to be balanced against the fact that personalised advertising funds so many of the free content and platforms we use daily, from apps and websites to search engines. Personalised advertising can be enormously relevant and helpful to all of us – in particular reducing search costs or showing us things relevant to our personal interests. Yet it can also be frustrating, for young people and adults alike, if we keep being served ads we no longer – or never – want to see. This resource helps to put young people in the driving seat of what advertising they choose to see. This resource also introduces students to the EDAA's AdChoices<sup>8</sup> tool which can help them navigate personalised advertising.
15. The proposed toolkit and workshops on identifying and countering mis- and disinformation are particularly relevant in today's digital age, where the spread of false or misleading information can have severe consequences. Equipping individuals and organisations with the necessary skills to critically evaluate online content and sources is crucial for promoting a well-informed and media-literate society.
16. Additionally, the commitment to exploring potential technology solutions, such as watermarking or third-party plugins, demonstrates a forward-thinking approach that recognises the changing technological landscape and its impact on media literacy.

<sup>6</sup> Livingstone, S., Stoilova, M. and Nandagiri, R., 2020. Data and Privacy Literacy: The Role of the School in Educating Children in a Datafied Society. In: D. Frau-Meigs, S. Kotilainen, M. Pathak-Shelat, M. Hoechsmann and S.R. Poyntz, eds. The Handbook of Media Education Research [Online]. 1st ed. Wiley, pp.413–425. Available from: <https://doi.org/10.1002/9781119166900.ch38> [Accessed 4 June 2024].

<sup>7</sup> Media Smart. Manage Your Online Advert Experience. Available from <https://mediasmart.uk.com/manage-your-online-advert-experience/>.

<sup>8</sup> EDAA. Your Online Choices – a guide to online behavioural advertising. Available from <https://www.youronlinechoices.com/uk/>. [Accessed 7 June 2024].

However, we think it would be a missed opportunity if the strategy did not specifically refer to the impact of generative AI and the implications for media literacy.

17. Finally, the indicators of success in this chapter feel somewhat vague. We would prefer more concrete KPIs that could measure the impact of this research, evidence and evaluation objective.

**Question 2: Do you agree with our proposals in this section for working with platforms? Please explain your reasons and provide any relevant supporting evidence.**

18. Yes, we agree with Ofcom's proposals for working with online platforms to promote media literacy, as outlined in Chapter 3 of the consultation document.
19. Online platforms play a pivotal role in shaping media consumption and user experiences. Media Smart supporters already include platforms such as Google, Meta, TikTok, Twitch and Yahoo! It also includes digital advertising platforms, through the IAB UK, and influencer marketing agencies and influencer marketing platforms, through the IMTB. By actively engaging with platforms and encouraging the adoption of best practices, Ofcom can leverage the platforms' reach and influence to drive meaningful improvements in media literacy among their user bases.
20. We support the emphasis on promoting Ofcom's Best Practice Principles for Media Literacy by Design and building a collective understanding of what users consider helpful for navigating the online environment. This user-centric approach is crucial, as it ensures that any interventions or features implemented by platforms are tailored to the actual needs and preferences of their users, increasing the likelihood of successful adoption and impact.
21. An important component of media literacy is understanding persuasive design. It helps people critically analyse the underlying motives and methods employed by media creators and platforms. Media Smart resources explain exactly what advertising does, how to read an advert and how it conveys information. However, persuasive design should not be seen as negative by default, and it needs to be viewed in context. For example, we think that the line ought to be drawn at design approaches that are deliberately intended to misinform or mislead end users as something distinct from online services presenting information in ways that are appropriate for its audiences, products, brand tone of voice etc.
22. The proposal to encourage platforms to evaluate the impact of their interventions and share learnings is particularly valuable. This practice fosters transparency, accountability, and a culture of continuous improvement within the platform ecosystem. By sharing what works and what does not, platforms can learn from each other's experiences and refine their strategies, ultimately benefiting users across multiple platforms.
23. Additionally, we applaud Ofcom's efforts to encourage platforms to fund and support media literacy programs and initiatives, either directly or indirectly. This approach recognises the shared responsibility of platforms in promoting media literacy and their unique ability to provide resources and amplify the reach of such programs. It is essential

to strike a balance and ensure that these initiatives are comprehensive, unbiased, and aligned with established best practices.

24. Furthermore, we believe that Ofcom's proposal to explore consensus-building around best practice principles for media literacy delivery could be beneficial. By establishing a set of widely accepted guidelines, platforms and other stakeholders can ensure consistency and quality in their media literacy efforts, ultimately enhancing the overall impact and effectiveness of these initiatives.

**Question 3: Do you agree with our proposals in this section? Please explain your reasons and provide any supporting evidence. We are particularly interested in any views and evidence about whether a Media Literacy Week would be impactful.**

25. Yes, we largely agree with the proposals outlined in Chapter 4 regarding People and Partnerships. Ofcom's emphasis on targeting interventions towards cohorts with the greatest need, such as communities experiencing financial disadvantage, older adults, and children, is an approach that aligns with the maximin theory of distributive justice which is closely associated with the work of John Rawls<sup>9</sup>.
26. However, in combating mis- and disinformation, it is worth highlighting a recent study<sup>10</sup> done by researchers from Israel and the US which found that around 80 percent of the fake news shared on Twitter during the 2020 US presidential election came from just 0.3 percent of users. Furthermore, these "supersharers" were disproportionately Republican, middle-aged white women residing in three conservative states, Arizona, Florida, and Texas. The authors also found that the neighbourhoods were poorly educated but had relatively high income. There are important implications to be drawn from this study: whilst the research is US-centric, and the need to prioritise resource notwithstanding, we should also consider broader interventions over the longer run to deliver maximum impact.
27. The plans to expand training programs for professionals working with children and young people are commendable, as these individuals play a crucial role in shaping the media literacy skills of future generations. By equipping educators, mental health professionals, and social care providers with the necessary knowledge and tools, Ofcom can amplify the reach and effectiveness of its media literacy initiatives.
28. That said, we would advise Ofcom not to only rely on overstretched schools and teachers to always deliver media literacy education and consider more innovative deliver methods. For example, Media Smart has taken the approach of educating young people directly with 'edutainment' through the online places they tend to visit and through screens in colleges and universities.
29. Furthermore, the commitment to building partnerships with organisations that have trusted relationships with underserved communities is a sound strategy. Leveraging existing trust and local expertise can significantly enhance the receptiveness and

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<sup>9</sup> Rawls, J. (1971). A Theory of Justice (rev). Harvard University Press.

<sup>10</sup> Baribi-Bartov, S., Swire-Thompson, B. and Grinberg, N., (2024). Supersharers of fake news on Twitter. Science [Online], 384(6699), pp.979–982. Available from: <https://doi.org/10.1126/science.adl4435>.

resonance of media literacy programs within these communities, increasing the likelihood of successful adoption and sustained impact.

30. Regarding the potential implementation of a Media Literacy Week, we believe it could be a valuable initiative, provided it is carefully designed and executed. A dedicated awareness campaign of this nature can help raise the profile of media literacy and catalyse conversations around its importance across various sectors and communities. Media Smart would like to be involved in any discussions regarding a potential Media Literacy Week.
31. However, for a Media Literacy Week to be truly impactful, it should be supported by robust evidence and best practices. We suggest that Ofcom conduct a thorough review of similar initiatives implemented in other contexts, both nationally and internationally, to assess their effectiveness and identify key success factors. Additionally, it would be prudent to engage with relevant stakeholders, including educators, community organisations, and media literacy experts (including Media Smart), to ensure that the Week's activities and messaging resonate with diverse audiences and address their specific needs and concerns.
32. Moreover, a Media Literacy Week should be viewed as a catalyst rather than a one-off solution. It should be integrated into a broader, sustained media literacy strategy that encompasses ongoing educational programs, resource development, and partnerships. The Media Literacy Week could serve as a platform to showcase these efforts, encourage public engagement, and foster collaboration among stakeholders.
33. In terms of evidence supporting the potential impact of a Media Literacy Week, there are examples from related fields that highlight the value of dedicated awareness campaigns. For instance, the annual Safer Internet Day, coordinated by the UK Safer Internet Centre, has been successful in raising awareness about online safety issues and promoting positive online behaviours among children, young people, and their families.

**Question 4: Do you agree with our assessment of the potential impact on specific groups of persons?**

34. We agree with Ofcom's assessment of the potential impact on specific groups of persons outlined in Chapter A1. Recognising that certain communities, such as those experiencing financial disadvantage, older adults, children, and individuals with disabilities or cognitive impairments, may face greater challenges in developing media literacy skills is important.
35. An equitable approach that prioritises targeted interventions for these groups aligns well with principles of inclusivity that our industry supports<sup>11</sup>. We believe all consumers should have equal access to understanding and navigating the media landscape, including advertising content across different platforms.
36. The commitment to a child rights-based approach, particularly upholding children's access to information from media sources, is also appreciated. As an industry that

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<sup>11</sup> Advertising Association (2023). All In. Available from <https://advertisingallin.co.uk>. [Accessed 7 June 2024].

markets products to children, we have a responsibility to support initiatives that empower young people to critically evaluate media messages. This is the core objective of Media Smart.

37. Additionally, we welcome Ofcom's recognition that media literacy can foster good relations and respect for diverse perspectives. In an increasingly polarised media environment<sup>12</sup>, promoting critical thinking and appreciation for different viewpoints aligns with our values of responsible and ethical advertising practices<sup>13</sup>.
38. The assessment appropriately highlights how online harms disproportionately impact certain groups, such as women, minorities, and the LGBTQ+ community. Enhancing their media literacy can empower them to identify and address discriminatory or abusive content more effectively, creating a safer digital environment for all.

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<sup>12</sup> Fletcher, R. (2022). Have news audiences become more polarised over time? Available from <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2022/have-news-audiences-become-more-polarised-over-time> [Accessed 7 June 2024].

<sup>13</sup> Credos (2024). The Value of Trust Report. Available from <https://adassoc.org.uk/our-work/the-value-of-trust-report/>. [Accessed 7 June 2024].

**Question 5: Do you agree with our assessment of the potential impact of our proposals on the Welsh language?**

Not answered.

24 June 2024

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**About the Advertising Association**

The Advertising Association promotes the role and rights of responsible advertising and its value to people, society, businesses, and the economy. We bring together companies that advertise, their agencies, the media and relevant trade associations to seek consensus on the issues that affect them. We develop and communicate industry positions for politicians and opinion-formers, and publish industry research through advertising's think-tank, Credos, including the Advertising Pays series which has quantified the advertising industry's contribution to the economy, culture, jobs, and society.

The membership of the Advertising Association is very broad and includes the associations representing industry sectors, such as the advertisers (through the Incorporated Society of British Advertisers), the agencies and advertising production houses (through the Institute of Practitioners in Advertising and the Advertiser Producers Association), all the media (from broadcasters and publishers, cinema, radio, outdoor and digital), advertising intermediaries and technology providers (which include platforms and the IAB UK), market research (through the Market Research Society) and marketing services such as direct marketing (through the Data & Marketing Association).

**About Media Smart**

Media Smart is the advertising and media industry's award-winning education non-profit with a mission to ensure that every 7 – 21 year old in the UK can confidently navigate the media they consume including being able to identify, interpret and critically evaluate all forms of advertising. The programme provides free educational resources for teachers, schools, parents/guardians and digital campaigns direct to its youth audience. Subjects include social media, digital advertising, political advertising, scam ads, greenwashing, body image, influencer marketing, creative careers and piracy which are delivered in the classroom, assembly, youth club or at home.

Media Smart also inspires – and provide pathways for – all young people to enter the working world of advertising and media, driven by their increased knowledge, understanding and curiosity about this industry landscape.

The supporter base brings together advertisers, agencies, media and trade bodies to support Media Smart's mission. Media Smart was incorporated into the Advertising Association in 2023.

## Context

Advertising and marketing are important. They play a crucial role in brand competition, drive product innovation and fuel economic growth. Many industries such as the arts, sport and culture depend on it for their revenues and it also funds a diverse and pluralistic media, including a free and open internet, enjoyed by consumers of all ages, including children and young people.

Advertising is also a driver of economic growth and competition. We have previously estimated that every pound spent on advertising returns up to £6 to GDP through direct, indirect, induced, and catalytic economic effects. The Advertising Association/WARC Expenditure Report UK's ad market will grow by a further 5.9% in 2024, to reach a total of £39.2bn – a new high and equivalent to a 2.5% rise in real terms. This would mean a contribution of approximately £235bn to the economy supporting over 1 million jobs across the UK.

According to Deloitte research carried out on behalf of the Advertising Association, the one million jobs supported by advertising can be broken down as follows:

- a) 350,000 jobs in advertising and the in-house (brands) production of advertising.
- b) 76,000 jobs in the media sectors supported by revenue from advertising.
- c) 560,000 jobs supported by the advertising industry across the wider economy.

Advertising can be a creative and inspiring world, where ideas come alive with drama, excitement and humour to entertain and engage us. But today, young people grow up in a world of commercial messaging that touches most areas of their lives – so it is more important than ever that they understand exactly what is being suggested, promised and sold to them. To date, there have been a total of 96,618 Media Smart resource downloads with a factored reach of 5,797,080. Additionally, there have been 18,303 users registered on the Media Smart website.