

Question	Your response
<p>Question 1: Do you agree with our proposals in this section? Please explain your reasons and provide any relevant supporting evidence.</p>	<p>Barnardo's welcome Ofcom's three-year media literacy strategy, including proposals set out regarding increasing research, evidence and evaluation of issues related to media literacy, and the delivery of media literacy interventions.</p> <p>We particularly welcome Ofcom's proposed research focus on why users engage in the perpetration of harmful activities which disproportionately affects women and girls, including how they get drawn into these communities, where the views are shared and found. This research will be particularly important regarding the types of content that children are viewing online which are affecting their behaviours and attitudes towards women and girls. The research should include a focus on pornographic content, particularly extreme and violent pornographic content which would be prohibited offline but is unregulated and prevalent online.¹ It should also include a focus on sexualised content often found on social media which does not meet the threshold for pornography, but what can act as a gateway to children viewing pornographic content. We would also welcome a focus on the increasing prevalence and influence of the so-called 'manosphere'. Research by Internet Matters found that 23% of boys aged 15-16 years old have a positive view of Andrew Tate.² The research should look at how all of these forms of content are impacting children's views of women and girls, and sexual behaviours. Similarly, in polling by Hope Not Hate, 16-17 year old boys were 21% more likely to have consumed content from Andrew Tate (71%) than to say that they had heard of Rishi Sunak (58%), or Keir Starmer (32%).³</p> <p>We also support Ofcom's proposal to amplify the voices and testimonies of different groups of individuals, including women and girls, and children. It is important that the voices and testimonies of a diversity of children are listened to, their voices amplified, and they are not seen as one homogenous group. Research from Barnardo's found that children in care, care leavers and young carers, those experiencing poverty, and children with addi-</p>

¹ https://cease.org.uk/wp-content/uploads/2021/07/210607_CEASE_Expose_Big_Porn_Report.pdf

² <https://www.internetmatters.org/wp-content/uploads/2023/09/Internet-Matters-Online-misogyny-and-image-based-abuse-report-Sep-2023-2.pdf>

³ <https://hopenothate.org.uk/andrew-tate/>

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	<p>tional needs are more susceptible to online harms.⁴ The ways that children use social media, also affect their exposure to online harms. Research from Internet Matters found that children who are more active online (i.e. posting rather than just scrolling) can be more likely to see violent content, be contacted by someone they didn't know, see false information and receive abusive messages.⁵</p> <p>We also welcome Ofcom's proposal for research and evaluation regarding media literacy interventions to be shared with relevant authorities. We would encourage Ofcom to share this information and work closely with the Department for Education, to understand how these learnings can be embedded into the Relationship, Sex and Health Education (RSHE) curriculum. It is important that all children have access to age-appropriate information about online safety. This should include issues related to child sexual abuse and exploitation, child criminal exploitation, harmful content including pornography, content that promotes self-harm, suicide, disinformation and eating disorders, and where to access support.</p> <p>However, increased media literacy should not be a substitute for other protections online, and children cannot and should not be expected to safeguard themselves. Any media literacy interventions targeted to children, including through RSHE lessons, must make it clear that children abused online are always victims, including when they are coerced, exploited and manipulated into sharing images or activities. Whilst an important tool, media literacy and education alone will never prevent harm to children.</p>
<p>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</p>	<p>Barnardo's welcomes Ofcom's proposal to ensure that online services provide better media literacy support for their users, and support media literacy being a part of measures in the Online Safety Act Codes of Practice developed by Ofcom.</p> <p>It is important the online platforms take responsibility for the safety and protection of the users on their platform, and providing media literacy will help to ensure this. Media literacy for children should be age-appropri-</p>

⁴ https://www.barnardos.org.uk/sites/default/files/uploads/B51140%2020886_Social%20media_Report_Final_Lo%20Res.pdf

⁵ <https://www.internetmatters.org/hub/research/insight-from-the-internet-matters-tracker-survey-june-2023/>

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	<p>ate and child-friendly, and should take into account the diversity of children. This means that children who have additional needs, including special educational needs and disabilities, or younger children, are considered when developing media literacy interventions on platforms. Parents should also be supported with media literacy to help support their children’s experiences online.</p> <p>However, as already set out, it is important that the implementation of media literacy on platforms are not seen as the only solution to ensuring they are safer for children. We cannot expect children and young people to take responsibility for protecting themselves online, or for parents or carers to receive blame when abuse happens. Media literacy should not be used to gloss over the need for regulations and content moderation, and sadly, no amount of media literacy can prevent a child from simply coming across inappropriate material.</p> <p>We welcome Ofcom’s proposed focus on the evaluation of media literacy interventions on online platforms. It is important that platforms are encouraged to evaluate the impact of their interventions for child users, and that users’ experiences and views are also prioritised when evaluating interventions. This should include listening to the views of child users.</p> <p>Finally, we welcome Ofcom’s focus on working to ensure that platforms fund media literacy programmes. It is important that platforms are encouraged to fund media literacy programmes that are equitable, including media literacy programmes designed for and accessible to all children. This should include investing in media literacy interventions developed for different genders, children with SEND, children across different geographical areas, children in care and care leavers, young carers, children experiencing poverty, refugee and migrant children, and children where English is not their first language.</p>
<p>Question 3: Do you agree with our proposals in this section? Please explain your reasons and provide any relevant supporting evidence. We are particularly interested in any views</p>	<p>We welcome Ofcom’s proposed focus on improving access to media literacy skills and support across the population.</p> <p>Within this, we are pleased to see that Ofcom will take a child rights-based approach when working with children, including that any work with children takes their views</p>

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<p>and evidence about whether a Media Literacy Week would be impactful.</p>	<p>into account. It's also welcome to see that Ofcom recognise that children with particular characteristics are likely to need support with their media literacy skills. In addition to the groups listed, we would encourage Ofcom to recognise other groups of children that may need additional media literacy support, including children experiencing poverty, refugee and migrant children, young carers and younger children.</p> <p>We are supportive of Ofcom's proposed equitable approach when considering the media literacy topic areas. We would support the work around harmful content that impacts women and girls being particularly targeted towards boys and men, however this media literacy work should not be blaming of boys and should recognise the impact that this content can have on them, their behaviours, and their mental health too. We would also recommend including women and girls in media literacy work around this area, albeit with a different angle, to help them understand the impacts that this content can have on them, including their understanding of issues such as abuse and consent.</p> <p>Regarding a media literacy week, we would be supportive of any measures that raise awareness regarding the need for and importance of increased media literacy skills and to improve media literacy skills. As set out, we would want any awareness raising regarding media literacy to not put an onus on children/ young people and parents/ carers to protect themselves or their children online, and it should not be seen as a substitute for online safety tools and content moderation.</p>
<p>Question 4: Do you agree with our assessment of the potential impact on specific groups of persons?</p>	<p>We agree with Ofcom's assessment in the Equality Impact Assessment, and think that the proposed media literacy strategy will have a positive impact on children.</p> <p>We agree with Ofcom's approach to provide a universal offer regarding media literacy, and also to take an equitable approach in targeting the communities most likely to need more media literacy support, including children and communities experiencing financial disadvantage.</p>

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<p>Question 5: Do you agree with our assessment of the potential impact of our proposals on the Welsh language?</p>	<p>We do not have any comments on the impact of Ofcom's proposals on the Welsh language.</p>