About Full Fact

Full Fact fights bad information. We're a team of independent fact checkers and campaigners who find, expose and counter the harm it does. 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. We ask people to correct the record where possible to reduce the spread of specific claims. We campaign for system changes to help make bad information rarer and less harmful, and we advocate for high standards in public debate. 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.

Introduction

Full Fact has long argued that good media literacy is the first line of defence against bad information online. It can be the difference between making decisions based on sound evidence, and making decisions based on poorly informed opinions. These can harm health and wellbeing, social cohesion, and democracy.

Ofcom must make media literacy a priority, and this draft three-year strategy signifies laudable intent. We would like to see further government investment in media literacy, but for the time being Ofcom must make the most of its new responsibilities under the Online Safety Act. As technology improves, media literacy programmes need to play a leading role in strengthening and adapting existing skills, as well as teaching new skills and knowledge to help citizens navigate the information environment. Meanwhile internet platforms may well need to be cajoled into taking their media literacy responsibilities more seriously. As experts in the field of misinformation, Full Fact stands ready to support and partner with Ofcom in this work.

Your response

Question	Your response
Question 1: Do you agree with our proposals in this section? Please explain your reasons and provide any relevant supporting evidence.	Confidential? – N We broadly agree with these proposals. Ofcom has played an important role as an instigator and supporter of research into media literacy in recent years, and should build on this success. In 2023 the regulator found that misinformation was the most prevalent potential harm encountered by adults online, with two in five of them reporting having seen misinformation in a four-week period.[1] This included

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[1] Ofcom, 'Online Nation 2023 Report', 28 November 2023, https://www.ofcom.org.uk/__data/assets/pdf_file/0029/272288/online-nation-2023-report.pdf.

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	misinformation with political or electoral content, content which discriminated on the grounds of a protected characteristic, and financial and health misinformation. Meanwhile, a nationally representative survey carried out by Ipsos UK and Full Fact in December 2023 indicated that one in four UK adults finds it difficult to distinguish true information from false information, and that one in three adults had falsely believed a news story was real until they found out it was fake.[2] So a large proportion of the population is seeing misinformation online, yet is not feeling confident about being able to tell whether something is true or false. Therefore the focus on research into mis and disinformation is welcome and must remain a key priority in the strategy. There is also a clear need for more evidence about "what works" in educating different audiences, and it is good to note that Ofcom's research programme prioritises this. We are pleased that Ofcom plans to do further work on messaging. It might help to recount some of our own experience. In the past we have commissioned and reviewed research into the effectiveness of fact checking and corrections, and even how to communicate with believers in conspiracy theories. The findings have helped us to inform our own work; the same could apply to Ofcom, and is needed for media literacy projects. For instance, journalists and civil servants largely "speak our language" and work in our world. On the other hand, teachers or members of the public are less adjacent and have different needs, but these groups must be prioritised as both the key deliverers and recipients of media literacy interventions. Furthermore, the term "media literacy" itself may be too broad in some contexts, especially considering the skills the public needs help with when navigating an online environment full of misinformation. Other terms along the lines of "critical thinking", "information literacy", or "separating fact from fiction" could help to signify a more accessible offer and be less exclusionary. As stated, the proposed areas for Ofcom research look sound. However, there are some further topics

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[2] Ipsos, 'Full Fact UK Public Attitudes Research', April 2024, http://fullfact.org/audience-research-2023.

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	we would like to see incorporated into Ofcom's plans. One of these relates to how online content is described. As one of Meta's "third party" fact checkers since 2019, we have gained some insight into how the work we do with information on Meta's platforms is then communicated to the public. We are conscious of the risk to freedom of expression from attempts to counter harmful false information, and it is important that experts in public debate recognise those risks. For this reason we do not advocate the wholesale removal of content that we have fact checked (unless it is illegal content), and instead prefer the route of adding context and flags: currently the results of our fact checks are flagged to the user account responsible for posting it, and they have a right of appeal. The post itself becomes greyed out, along with a link to the particular fact check on our website. However, users who have previously 'liked' or shared the fact-checked content do not subsequently receive any notification that they have - perhaps unwittingly - played a role in the dissemination of false information online. We think that retrospective communication like this could play a part in improving the public's media literacy: but further research is needed into such communication of fact-checked content on internet platforms, and Ofcom are perhaps best placed to lead such projects.
	A further area to consider relates to how mis and disinformation risks intersect with those posed by generative AI. While it is laudable that Ofcom has highlighted generative AI as a key risk factor in disinformation around elections and first-time voters, the negative impacts from misuse of the technology should not be considered to be confined to a particular age demographic, or indeed apply merely to the democratic space. We encourage Ofcom to consider a wider remit for its research into media literacy around generative AI. In particular, this should take a deep dive into the most effective ways (watermarking, metadata, fingerprinting, etc.) to inform the public about what is and isn't generative AI-created content.
	An overarching consideration is that the world of generative AI is fast moving, and therefore any three

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	year research strategy must be flexible enough to cope with rapid advances in technology. One final research suggestion is the issue of trust, especially in how to communicate media literacy effectively. It is clear from the proposals in the People and Partnerships section that Ofcom recognises the need for trusted delivery partners, but we feel that it should also do more research on trust. Full Fact has experienced this problem when training journalists from African countries, because there are cultural barriers to accepting training or guidance from people from another culture or part of the world. This could also be the case when targeting "vulnerable" or hard-to-reach groups with media literacy programmes. Therefore trust should be a core part of designing research to inform policy development. This is because understanding what makes people trust or distrust information not only informs the approach of media literacy projects, but can also inform the approach of disseminating this training effectively to different audiences.
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	Confidential? – N As stated earlier, Full Fact has experience in working with platforms, in that we have provided third-party fact checking services for Meta for five years. Unfortunately it remains hard for us to fully understand the impact of this work, due to the extremely limited metrics we receive from Meta about the reach of our content, and any behaviour changes identified. We agree with the direction of this section but feel that the overall "outcome" needs to be more ambitious, and this ambition must then inform the wider proposals. Currently the projected outcome states that: *by 2027, online services will provide better media literacy support for their users, more evaluation of the impact of this support, and longer-term funding for initiatives…* We would suggest this is amended to something like:

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	*by 2027, **all major** online services will provide **the highest quality** media literacy support for their users, **robust** evaluation of the impact of this support, and **will dedicate X% of their UK revenue** to fund long-term initiatives…*
	While it is not in Ofcom's power to *compel* platforms to achieve such lofty outcomes, this should not hold the regulator back from aspiring to excellence. Within the wider proposals there is plenty of reference to "encouraging" and "exploring", but we would like to see much more emphasis on "monitoring" - Ofcom should be taking this opportunity to set out its stall as a regulator keeping a close eye on platforms' behaviour, rather than mere facilitator.
	Much like the "polluter pays" principle of environmental taxation, platforms should contribute far more resources to media literacy: Internet platforms have enabled the misinformation crisis; they must take on a greater responsibility to tackle it. Granted, Ofcom's role as the online safety regulator is still in its early days, and there may be some scepticism from platforms as to the regulator's credibility in the media literacy space. Nevertheless, we would like to see embedded in this strategy a commitment from Ofcom to "go public" when particular platforms fail to fulfil their media literacy duties, or if they fail to engage sufficiently with the regulator. So the proposal of "working with online services to encourage them to adopt our Best Practice Principles for Media Literacy by Design" could be strengthened by stating clearly what Ofcom will do to hold them to account when platforms fail to adopt such principles.
	Previous reluctance from platforms to adopt cross-sector principles demonstrates the task at hand: for example YouTube, LinkedIn, X, and Telegram all currently fail to uphold the commitments on independent fact-checking found in the EU's code of

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	practice on disinformation.[34] Ofcom should expect such similar intransigence with media literacy, and accordingly prepare some robust sanctions within the scope of its existing powers - even if the extent of such sanctions may simply be to publicise prominently the names of those platforms who fail to take media literacy seriously. We are pleased to see that Ofcom has identified mis and disinformation, and content of democratic importance, as key priorities for engaging platforms. Full Fact has long had concerns about the impact of bad information on the democratic integrity of the UK. While the 2024 general election has arrived earlier than expected, and it is clearly too late for this draft strategy to be able to inform Ofcom's oversight of this particular election, we would like to see more detail in place on how Ofcom will plan for future elections. Therefore this strategy should contain a commitment to publish a plan specifically about risks and mitigation of misinformation and disinformation during major elections, including how Ofcom would respond to a request by a Secretary of State to prioritise media literacy during an election information incident. Such a plan would contain recommendations for stakeholders, including online platforms and search engines, on media literacy and UK elections. In this way there will be an "off the shelf" resource ready in good time for the next general election which, depending on the whim of the Prime Minister of the day, could of course occur within the lifetime of a three year strategy.
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 and evidence about whether a Media Literacy Week would be impactful.	Confidential? – N We agree with the stated outcome, and related proposals for people and partnerships. In particular we are pleased to see that Ofcom recognises the need for media literacy to be delivered by trusted voices. Since Full Fact began fact checking UK politics in 2010, our role has expanded from publishing

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[3] Eucrim, 'The Strengthened Code of Practice on Disinformation', 22 June 2022, https://eucrim.eu/news/the-strengthened-code-of-practice-on-disinformation/.
[4] Full Fact, Full Fact Report 2024, ch. 5, April 2024, https://fullfact.org/policy/reports/full-fact-report-2024/#chapter-5-ensure-fact-checkers-have-the-tools-and-data-needed-to-fight-harmful-misinformation-and-disinformation.

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	reactive articles, to intervening proactively in the information ecosystem and delivering training. The first steps came when we began to marshall our fact checks as evidence for the impacts of misinformation during the passage of the Welfare Reform Bill shortly after the 2010 election, followed by submitting evidence to the Leveson Inquiry on the state of press regulation. We began to work alongside information producers such as the Office for National Statistics (ONS), helping them to understand the impact of their products and improving the quality of their dissemination. We now seek to utilise our experience in order to share fact checking, critical thinking and data analysis skills, as well as understanding the harms caused by misinformation. Some of this comes through direct training interventions aimed at civil servants and journalists, in the form of fact checking workshops and exercises in live-checking political debates. Our work sharing critical thinking skills expands to research and communications professionals in the private and third sectors - we have now run nearly 100 of these sessions. We also provide training to schools and colleges in understanding 'who to trust' and how to analyse sources. Our work in the education sector has happened through partnerships with BBC Newsround (for Key Stage 2 critical thinking), the Welsh Government (understanding the impacts of misinformation, targeted at primary and secondary-level teachers), and the National College of Digital Skills (providing data analysis skills to post-16 apprentices). More recently, we have delivered AI-focused training with fact checkers across Europe on best practices, new techniques and essential tools for identifying AI generated and digitally altered content. The project, funded by Meta, also includes a media literacy campaign to raise public awareness of how to spot this type of content.[5]

[5] EFCSN, 'EFCSN'S new project for identifying ai generated and digitally altered content', 18 April 2024, https://efcsn.com/news/2024-04-18_efcsns-new-project-for-identifying-ai-generated-and-digitally-altered-content/.

Question	Your response
	It is vital that Ofcom's proposed partnerships extend beyond the usual suspects. Research by Full Fact into what makes an effective media literacy intervention found that good practice is "not confined to the structures of classrooms", and that even "brief training sessions of 15 minutes can improve media literacy to some extent".[6] This is echoed in a recent evaluation of the UK media literacy landscape commissioned by the Department for Science, Innovation and Technology (DSIT), which recommends embedding media literacy "in services people already use".[7] So Ofcom's role as a coordinator of media literacy partnerships is vitally important, as it highlights the value of finding partner organisations that are embedded in the communities they serve, rather than just empowering experts with insights in how to deliver interventions to different audiences. Accordingly, Ofcom can play an important role in linking expert providers of information services with expert communicators for a range of specific audiences. For example, Full Fact's expertise in fact checking could be linked up with teacher training organisations – or indeed Google + Parent Zone referenced in the consultation document. Indeed, our current partnerships go beyond the formal education sector. We are piloting groundbreaking work for communities targeted by or with misinformation, for example during the pandemic we teamed up with Pregnant Then Screwed[8] to provide clarity on vaccines and pregnancy. This work was praised by the NHS. Media literacy is a multi-sector responsibility. Much like road safety, where highway authorities, local councils, the police, schools, and public transport providers - to name but a few - all have a role to play, the same applies to media literacy. It is clear

[6] Full Fact, 'Media and information literacy: Lessons from interventions around the world', February 2020, https://fullfact.org/media/uploads/media-information-literacy-lessons.pdf.

[7] L. Edwards, V. Obia, E.Goodman & S. Spasenoska, 'Cross-sectoral challenges to media literacy - Final Report', UK Government Department of Science Innovation and Technology, August 2023, https://assets.publishing.service.gov.uk/media/651167fabf7c1a0011bb4660/cross-sectoral_challenges_to_media_literacy.pdf.

[8] Full Fact, 'Covid vaccines and pregnancy: fact checked', 20 August 2021, https://fullfact.org/blog/2021/aug/covid-vaccines-and-pregnancy-fact-checked/.

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	from the content of this draft strategy that Ofcom understands this. The proposal for a Media Literacy Week therefore has merit, but it will take thought and time to embed across the relevant sectors who will all be working to their own timetables and priorities. Instant results should not be expected from such a programme, but it is important to ensure that key partners are on board with such initiatives at an early stage.
Question 4: Do you agree with our assessment of the potential impact on specific groups of persons?	N/A
Question 5: Do you agree with our assessment of the potential impact of our proposals on the Welsh language?	N/A