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.	**General points:** Overall, we agree with the impressive aims and research ambitions, particularly the goal to assess changes in media literacy levels over time. However, the research seems to be focused primarily on the digital aspect of media literacy, rather than the more creative uses or democratic potential. This impact of media literacy is complex but vital for our democratic health. Additionally, priority topics are framed in terms of harms-likely because they reflect the priorities of the OSA, which is understandable – but defences against harm don't equate to proactive, productive and creative use of media (for example, as a means of public engagement). We would therefore recommend integrating a specific commitment to evaluating the qualitative engagement with media that could be prompted by media literacy training focused on creative use and information seeking for the explicit purpose of democratic engagement. Furthermore, in parallel with the focus on digital and online media, we propose that a more general focus on user creativity and deliberative engagement be included and that legacy/traditional media are explicitly named as important sources of information in this respect. Additionally, the stated focus on women and girls should acknowledge intersectionality, and ensure that other genders subjected to class-based or racial discrimination as well as that based on their sexuality, are not ignored here. Even if Ofcom prioritises women and girls, reflecting the priorities of the OSA, the information gathered through research should recognise other groups as well, and this should be explicitly stated in the strategy. There is further potential to highlight the work of academic researchers, and to develop opportunities to work more closely with them. Considering evaluation, we think it is worth pointing out recent and ongoing LSE research in this area, including an evaluation of Common Sense Media's Digital Citizenship Curriculum, and REMEDIS, which seeks to provide a framework for evidence-based evaluative research of media literacy and digital skills. **Specific comments:** **Regarding Goal 2**, we welcome the commitment to amplify the voices of a range of groups, but a target audience for this amplification is not specified – eg is it policymakers, platforms, communication industries, or the wider media literacy ecosystem?

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	Also, those with protected characteristics are listed as a focus in terms of looking at the impact of media literacy, but this doesn't necessarily account for class, <u>which is still a major locus of discrimination</u>. **Regarding Goal 3**, there is a stated focus on providing guidance to those working to address mis- and disinformation – is this too narrow, given that critical thinking skills can be used for other purposes also? Furthermore, we suggest that the dissemintation of the toolkit and workshops for media literacy providers could be best operationalised through a train-the-trainer approach, to maximise community reach. This would best realise that ML is 'everyone's business' and also align better with Ofcom's desire to be a catalyst and convenor rather than implementing. **Regarding Goal 4** – training is welcome here, as publishing a framework is not sufficient to effectively cascade information across people and partnerships. A more thorough active and explicit integration strategy could be useful here. **Regarding the indicators of success**: the focus on research being 'highly regarded' could be reframed as useful.
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	**General points:** Overall, we welcome the approach and commitments outlined in this section on working with platforms. However, we think there is an opportunity here to expand the focus of platforms beyond online safety, and towards the idea of using media for flourishing and for engagement. Because of the focus on the individual, the societal level effects (positive and negative) are also lacking here. The strong user focus of the Best Practice Principles for Media Literacy by Design is valuable, but this section would be strengthened with <u>Research</u> from LSE's Digital Futures for Children Centre provides evidence that regulation focused on children's privacy and safety is starting to have a substantive impact in terms of platforms' child safety and privacy changes, particularly on 'by default' changes which can make a significant difference to children's online experience. Therefore, it is worth looking closely at regulatory obligations and opportunities. It is worth looking to lessons from the European Union's work in this space, with the Code of Practice on Disinformation's call to platforms to promote media literacy as part of their user empowerment obligations being integrated into the Digital Safety Act. **Specific comments:** **Regarding Goal 1** - it would be helpful to further clarify 'collective understanding' and who exactly this relates to. The focus on 'content of democratic importance' is valuable but more explanation of how users understand this would be welcome.

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	Regarding Goal 2 – we would specify that platforms should be encouraged to commission **independent** evaluations of their interventions, and commit to sharing what is less effective, as well as what is most successful.
	Regarding Goal 3 – we support the commitment to push platforms in their ambition to serve under-served groups, and would suggest identifying more specific ideas for support for specific target communities (women and girls, those with protected characteristics those vulnerable to class-based discrimination, for example).
	Regarding indicators of success – cncouraging multi-year investment from platforms would be very welcome, but should be specified and explained earlier in the document. It would also be worth specifying in the second indicator that the best practice principles are targeted at platforms.
	Regarding 'what is different?' – it would be helpful to further explain the reference to 'a culture' here: what specifically does this refer to?
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.	**General points:**
	Overall we agree that this section outlines a sensible approach and contains a strong set of proposals for action.
	We wonder whether rather than using the phrase 'media literacy should be everyone's business' it would be valuable to break it down into components such as having the competences to value media, navigate it safely, and engage with it positively, to help widen understanding of it.
	Specific comments:
	Regarding the mention of the UNCRC, we would also urge Ofcom to take into account [General Comment 25 on children's rights in relation to the digital environment](#).
	Regarding Goal 4 - expanding the network is key and these commitments are welcome. However, in order to make media literacy "everyone's business," it is necessary to forge new relationships with people and organisations that do not know what media literacy means. There should be an explicit commitment to invite those organisations that would greatly benefit from media literacy but are currently absent from and unfamiliar with the debates around it.
	Having noted this, the initiatives proposed would all be valuable. Regarding a media literacy week, we suggest a pilot scheme in the first year in a specific region or locality, targeting some of the key topics in the strategy. This could then be evaluated and adapted and expanded as necessary in the second and third years. Coordination among the sector itself is feasible, but it is a significant job, so organisational input (or possibly some kind of secondment from Ofcom to support organisers) would be necessary. Support could also come from media companies as well as platforms and wider

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	communication industries, as well as target sectors (such as health or finance.) Lessons from other countries such as Finland, France, Netherlands and Canada suggest that a media literacy week can be an important focal point during the year for the sector and those close to it, with significance and impact that go beyond the week itself, also allowing for a more positive framing of media literacy beyond preventing online harms.
Question 4: Do you agree with our assessment of the potential impact on specific groups of persons?	Confidential? – Y / N
Question 5: Do you agree with our assessment of the potential impact of our proposals on the Welsh language?	Confidential? – Y / N