

Consultation response form

Your response

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>Confidential? – N</p> <p>We welcome Ofcom’s commitment to undertaking research on the use of media by various groups, including people with a learning disability. It is crucial that this approach continues under the new requirements set out in the Online Safety Act.</p> <p>While the online experience of people with a learning disability has a good amount of anecdotal evidence, especially with regards to negative experiences and the challenges around online literacy, more needs to be done to understand those who are harder to reach and potentially will benefit more from a good literacy offer from Ofcom.</p> <p>We are concerned that Section 2.6 does not include a specific reference or commitment to work on why people engage in harmful activity towards people with a learning disability. Understanding the reasoning and basis for prejudice towards this group will help Ofcom address this issue in their wider media literacy work as well as supporting campaigners in their messaging to tackle stigma. People with a learning disability should be included in the ‘tracker samples’ given the impact of harmful content on this group. This should especially be the case given the later references in the proposals that people with a learning disability are expected to heavily benefit from these proposals. We have extensive experience in creating and spreading accessible information, including on staying safe online, and stand ready to work with Ofcom on this.</p> <p>With regards to 2.8, the provision of tools and guidance is welcome, and we would encourage Ofcom to use the</p>

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	<p>networks of disability charities and campaigners to disseminate these tools widely.</p> <p>Accessibility of media literacy programmes must also be an indicator of success. People with a learning disability should be consulted on the accessibility of Ofcom’s offerings to ensure that the programme is delivering its message effectively to this group.</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>Confidential? – N</p> <p>We are concerned that section 3.7 does not mention harmful content against disabled people. Given the specific protections offered to disability in the Online Safety Act, as well as wider acknowledgment of the negative experiences of this group, Ofcom should include disability in the subpoints in section 3.7.</p> <p>We welcome the proposals in section 3.8 which will help break down mistrust between some campaigners and platforms regarding any analysis undertaken by platforms into their systems.</p> <p>We also know that making systems and processes work for people with a learning disability can have knock-on benefits for the public. This is usually through the provision of clearer information and simplifying processes which all people benefit from, and this should be the case with the complex, and sometimes opaque, processes of social media platforms.</p> <p>We welcome goal 3 as working with online services is crucial to ensuring that they understand the needs of people with a learning disability. Funding media literacy programmes allows online services to partner with organisations, such as Mencap, to share skills, knowledge and lived experience which we know is key to producing media literacy programmes that address the right issues and in a way that resonates with the intended audience. For example, since January 2023 we have partnered with Google on the ‘Guardians of the Internet’ project. This is a co-produced training course for young people with learning disabilities aged between 11-16. The focus of the training is for participants to learn how to be safe online. From identifying scams, tackling misinformation and developing online critical thinking skills. The course itself was co-produced by young people with learning</p>

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	<p>disabilities. We have partnered with schools across the country to deliver this training.</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 and evidence about whether a Media Literacy Week would be impactful.</p>	<p>Confidential? – N</p> <p>We welcome these proposals and especially those under section 4.5. Ensuring that children with a learning disability have initiatives designed for and appropriate to them will help provide this group with the skills necessary, especially given the wider spread of technology among younger people.</p> <p>We welcome the approach set out in section 4.7 to “forge partnerships with third-sector organisations” alongside others. Utilising the experience of these groups and their wealth of lived experience will help create accessible and helpful materials as well as disseminate them to the right audience. This approach ties in well with the proposal in section 4.12 to engage with local experts.</p> <p>As in above questions, people with a learning disability should be included in the list of “cohorts where the need is greatest”. To this end people with a learning disability (or more widely disability) should be listed in sections 4.10 and 4.13. We do welcome the proposal to build a coalition of third sector partners and expert organisations, especially with those who have links into harder to reach communities where their trusted name could help disseminate resources more effectively.</p> <p>Mencap would welcome a media literacy week under Ofcom’s umbrella. This could provide an opportunity for media literacy content and programmes to receive attention in the wider media, use the profile and reach of the government, and encourage settings such as community groups, schools, and care settings to take part.</p>

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<p>Question 4: Do you agree with our assessment of the potential impact on specific groups of persons?</p>	<p>Confidential? – N</p> <p>We welcome the inclusion of people with learning disabilities in sections A1.8 and A1.10. The changes to the world of social media being introduced by the Online Safety Act has the potential to significantly improve the experience of people with a learning disability online. But this can only be achieved with an effective and accessible media literacy programme to provide people with a learning disability with an understanding of the changes and the tools and knowledge to remain safe when online.</p> <p>To ensure that the media literacy programme is successful in its targeting of people with learning disabilities, Ofcom must consult widely with campaigners and charities to ensure that the design of the programme is accessible and that the hardest groups can be reached by using existing networks both national and local.</p> <p>We welcome the acknowledgment in section A1.13 that wider medial literacy work could help tackle existing issues such as stigma towards people with a learning disability. To ensure this, we would like to see references in the wider media literacy work to the stigma people with a learning disability face in society and when online.</p> <p>Materials should also be produced for parents and carers of people with a learning disability as we know that many have expressed their concerns about supporting their loved one to stay safe online. This should include information on how to have conversations about online safety, ways and tools to remain safe online, and tips on building digital skills and independence for when their loved one becomes an adult.</p>
<p>Question 5: Do you agree with our assessment of the potential impact of our proposals on the Welsh language?</p>	<p>Confidential? – N</p> <p>N/A</p>

Please complete this form in full and return to MSOMConsultation@ofcom.org.uk.