

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? – Y / N</p> <p>2.6 and 2.7 Ofcom’s research on media consumption is always useful and in particular it’s always good to understand how these habits change over time. We encourage this research to continue. We’d assume that objective measurements are going to be taken of people’s media literacy skills and that these are tracked over time, particularly over the 3-year span of this strategy, with a view to continuing this in future. We would welcome this approach, but its material implementation as a metric scheme must be a measurable outcome. Similarly, increasing the public’s actual media literacy scores should be a measurable outcome, either here or in section 3.</p> <p>We would also emphasise our keenness for research to be participative rather than extractive, giving people with living experience the platform to explore what is researched and how. Their expertise should be centred.</p> <p>2.6 The language of “vulnerable cohorts” should change, as it implies weakness or helplessness in those people. “People more susceptible to structural disadvantage” or similar would be better. We note elsewhere that the language of people “disproportionately affected by harmful content and activity” is used, which is better.</p> <p>2.6 We worry about putting too much responsibility on consumers as opposed to producers - it’s not good enough to tell people they need to modify their own behaviour when there are bad actors producing or permitting harmful content. The days are mostly long-gone of blaming cat-calling on women’s attire; to what extent are we telling women and girls to act differently to avoid online abuse? We therefore welcome an emphasis on understanding why people become perpetrators of harmful activity.</p> <p>2.8 We agree that “media literacy is everyone’s responsibility” in a sense but feel that this needs to be qualified somewhat. It is the responsibility of service providers, professionals, carers, etc as noted in the</p>

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	<p>strategy. There's a risk that "everyone's responsibility" is taken literally rather than with these nuances.</p> <p>However it's hard for that responsibility to stick to any one person or group at any particular time. So, we note that Ofcom proposes to provide tools and guidance to groups who promote media literacy, but it's unclear where the line is drawn between what Ofcom will and will not do. There's a vast amount of information and advice available on media literacy, or varying quality and age. We need a central repository of best practice - not an arbiter of good and bad content, but a resource hub of how to evaluate this content. If, however, Ofcom does not see its role as being the holder of such a repository, supporting its creation should be a main aim of this strategy. If media literacy is to be (within reason) everyone's responsibility, there needs to be a touch point everyone can access, otherwise we run the risk of multiple platforms using diverging terminology in a multitude of places, confusing everyone.</p> <p>2.9 We note the language around training and frameworks, and would add that training in a given context must be needs-based and relevant rather than off-the-shelf for all learners.</p> <p>2.10 The goals and their indicators of success seem very open and it's hard to see how success or failure could be objectively measured using them. It would be better to have some hard and fast metrics that are clear to all from the outset. How will Ofcom, and the public, measure when these things have been done well or badly? It's not at all clear. And we would specify that these metrics should measure success, not activity - in other words, they should measure the usefulness of what is done rather than the busy-ness of delivery.</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? – Y / N</p> <p>3.1 As mooted, we believe that Ofcom should indeed include media literacy as part of measures in its online safety codes of practice.</p> <p>3.5 We welcome Ofcom's recognition that these efforts have inherent limitations and fully agree. We do not believe these efforts are the ultimate solution.</p> <p>3.6 and following: Ofcom proposes to work collaboratively with platforms, making recommendations rather than compelling action. Would like the regulator</p>

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	<p>to actually regulate. We would like to see a greater emphasis within the strategy to compel platforms to promote media literacy, as it mainly resorts to voluntary measures instead.</p> <p>3.6 However, we understand that direct regulation may be difficult, politically. If Ofcom will not regulate this activity, it should consider ‘marking’ the main platforms, say annually, on pre-set criteria that gauge their responsiveness to mis and disinformation. Example measures would be ease of reporting, responsiveness to reporting, user satisfaction on reporting, number of reports relative to number of users (a trackable indicator of frequency), links to fact-checking, transparency of sources, availability of (or links to) proactive materials on media literacy, etc. Also, from a digital inclusion perspective, how many clicks and what skills are required for users to take action on mis/disinformation? An annual public scorecard that names (and shames!) each platform could provide a real incentive to those platforms and give the public an understanding of good practice - potentially equipping them with the knowledge to take their media consumption elsewhere. Platforms thrive on the public’s perception of trust, so Ofcom can and should leverage this need into a tool for self-directed improvement. This links directly to Ofcom’s strategic priorities: “media we trust and value” and “a safer life online”. We appreciate that Ofcom cannot “do it all” but it can evaluate what is being done. We note, for example, Ofcom’s ‘Video-sharing platform guidance’. To what extent are those platforms following this guidance? We believe the public should know, and that it is Ofcom’s role to tell them.</p> <p>Section 3.8 hints at activity in this vein but needs to be much more specific and directional, in line with the above approach.</p> <p>3.9 We think this will have limited scope. External, objective sources of knowledge and skills will be far more effective in equipping people to navigate the media landscape. Platforms should then direct their users to these sources.</p> <p>3.10 We note the mention of ‘on-platform’ support for media literacy. This may be useful in the moment, but it does not provide a key resource for people working on media literacy. Again (echoing our comments on 2.8 above), we will note that there’s a vast amount of information and advice available on</p>

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	<p>media literacy, or varying quality and age. We need a central repository of best practice.</p> <p>3.10 Again, the goals and their indicators of success seem very open and it's hard to see how success or failure could be objectively measured using them, as per our comments on section 2.10</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? – Y / N</p> <p>4.1 We wholeheartedly agree that this myth should be dispelled. Digital exclusion fits hand in glove with other forms of social exclusion.</p> <p>4.4 Ofcom should investigate the 5rights Foundation, which refers to the digital rights of young people that were created in reference to UNCRC. It seems like the perfect framing for these efforts. However, we're not sure that a rights-based framing will necessarily appeal to young people directly - perhaps more of an ethical foundation ("what is right?" as opposed to "what are my rights?") will appeal to the online activism of so many young people and the contemporary media they consume.</p> <p>4.5 We welcome the mention of young people with care experience. Our work has also highlighted the structural and material challenges this group faces.</p> <p>4.12 In our view, digital inclusion should be foremost in this strategy. We truly value the extent to which digital is being included in the conversation around media literacy. The two go hand-in-glove. It is therefore vital that digital inclusion forms a key part of this strategy: all digital inclusion activity has to include media literacy from day one, and vice versa. The question that must be borne in mind at all times in media literacy efforts is "how does this impact someone with low digital skills, or no/limited digital access?" And in the other direction, when working in digital inclusion, "how does this impact someone's ability to navigate the media landscape?"</p> <p>We would also want to highlight the specific needs that may arise in certain situations. Someone seeking asylum, for example, has a very targeted need around the privacy settings on their device, as their online activity could be monitored by state actors and this activity can literally include potential risk to life. Therefore any media literacy activity for such a</p>

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	<p>person has to feature digital inclusion on this topic as a very high priority.</p> <p>We would therefore like to see centrality in the strategy for initiatives covering both media literacy and digital inclusion. These are of the utmost importance.</p> <p>4.12 We welcome the place-based approach with trusted local partners, and agree that messages around things like avoiding extremist content need to reach people via these trusted intermediaries - nobody is going to come to a class run by a stranger on why they're using the internet badly, so that topic needs to come up within other conversations. But we also worry this localised approach could become atomised, so nationally, we all need to be working from an accepted level of best practice with a 'go-to' suite of resources or guidance, as mentioned in our earlier responses.</p> <p>4.13 With regards to a Media Literacy Week, we believe it would be essential to find a better term for this than Media Literacy - often, people simply don't know what it means. The language around this is important - it should feel like people are taking control over their lives, not taking on extra mental or emotional labour. People value ways to be more savvy, smarter, more empowered. They don't want to be told they've got deficient literacy and need to work harder to improve it. Such a week would be impactful if it was timed to coincide with other activities such as publishing our proposed report on how platforms are 'scored' on their media literacy efforts. It would be a great way to celebrate the success of platforms who are doing a great job on media literacy.</p> <p>4.14 If a future technology trends working group is set up, its terms of reference should include the digital exclusion factors that can lead to people being left behind from this 'future' - those consigned to the 'past' because of their equipment, skills or connectivity. And we feel such a working group has to include people with living experience of digital exclusion, so that they can play a participatory role in directing discussions, research and responses in this field.</p> <p>4.15 Again, the goals and their indicators of success seem very open and it's hard to see how success or failure could be objectively measured using them, as per our comments on section 2.10. However, we're</p>

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	<p>pleased to see one measurable element here (10 local digital inclusion strategies). We'd like to see more of this sort of specificity.</p>
<p>Question 4: Do you agree with our assessment of the potential impact on specific groups of persons?</p>	<p>Confidential? – Y / N</p> <p>We wonder if there could be a role for the people who are deemed to be in scope for an impact assessment such as this (protected characteristics, etc.) so that they could decide, in a participatory process, what would constitute impact and what the extent of that impact might be. This could feed into and overlap with engagements on other aspects of this strategy, centring their living experience and knowledge in a practical and positive way.</p>
<p>Question 5: Do you agree with our assessment of the potential impact of our proposals on the Welsh language?</p>	<p>Confidential? – Y / N</p> <p>No comments</p>