

## Your response

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<p><b>Question 1:</b> 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><b>Stance and reasoning</b></p> <p>The National Literacy Trust strongly agrees that there is a need for a “better understanding and measurement” of media literacy (ML) as identified in the Outcomes Statement. Important steps have been made to produce an Ofcom Evaluation Toolkit to support smaller organisations running ML interventions, while broader research has produced validated measures of news literacy for children aged 9 to 11 (<a href="#">Harrison et al., 2024</a>) and tools for adults (<a href="#">Maertens, 2023</a>). However, we suggest that more work is needed to develop validated measures and tools that support a more consistent measure of young people’s media literacy, and to explore to what extent existing approaches and techniques will be sufficient to support the critical evaluation of AI-generated content.</p> <p>Furthermore, in terms of developing “a deeper understanding of ‘what works’ for the delivery of media literacy interventions in relevant sectors”, we would also like to see more consideration of what works for delivery and impact. The strategy could provide an opportunity to increase how well interventions are informed, at design stage, by wider research and evaluations conducted already. For example, section 2.4 explains that, “We will boost our evaluation toolkit to further empower those running media literacy programmes to evaluate their own projects”. However, we suggest that it would be helpful to add some specific examples (e.g. providing core measures and tools or questions linked to them).</p> <p><b>Evidence</b></p> <p>In relation to ‘Goal one’, we recognise that Ofcom research makes a vital contribution to supporting media literacy in our own and others’ work, by providing essential context for proposals, research and evaluation, and CPD. The proposals around promoting further use and analysis around Ofcom research (e.g. testing messaging and trusted sources, exploring engagement with misogynist content etc.) all sound interesting and valuable, given the wealth of research showing that more girls and women</p>

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	<p>have negative experiences online and may be missing out on the potential benefits of the digital world as a result. However, we also suggest that there should be more focus on platforms' responsibilities to support building an evidence base. For example, the strategy discusses "understanding how people get drawn into communities that propagate discriminatory views against women and girls" (p. 9). But this understanding requires knowledge about how platforms' algorithms function and how they create situations where large amounts of harmful/discriminatory content are exponentially accessible to users (particularly young men and boys). This evidence about algorithms is in platforms' hands. Therefore, we suggest that platforms need to cooperate in building the evidence base.</p> <p><b>Core measures and Artificial Intelligence</b></p> <p>Section 2.6 explains: "We will ensure that we assess changes in media literacy over time, using a range of core measures". However, it would be highly useful if the strategy also provided a couple of brief examples of what is meant by 'core measures' (e.g. the ability to identify features of mis and disinformation and of more reliable information and sources). Furthermore, we question whether the strategy should also acknowledge/address the changing challenges that may occur over time and the need to update/expand measures accordingly. Currently, measures used in annual surveys appear to be suspicious content, fake Insta profile (serving as 'online info as true or false') and ads/sponsored content, but it remains unclear how robust/relevant these will continue to be, e.g. if/when AI may change the appearance of search ([Google AI Overviews]).</p> <p>Additionally, alongside the new areas of interest (presented in section 2.6), increasing awareness of the broader ecosystem seems important (e.g. economic models – see e.g. <a href="#">Polizzi, 2020</a>), as well as a more general amplification around awareness of violent content via algorithms that are designed to reward engagement (i.e., techniques for algorithmic curation etc.). There is only one reference to AI in the consultation document, which we suggest is a key oversight. For example, our own <a href="#">Empower programme</a>—which is delivered in over 150 schools to more than 1,700 students and specifically tailored for girls aged 11 to 14 in alternative provision or those at risk of exclusion from mainstream education—aims to cultivate</p>

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	<p>the skills, knowledge, and resilience necessary for students to enhance their critical literacy skills, effectively engage with online media, discern misinformation and disinformation, and express their perspectives safely in the digital realm. This programme also provides an understanding of generative AI and explores the benefits and potential pitfalls of this kind of technology. As such, we know how important developing this aspect of critical digital literacy is.</p> <p><b>Gender</b></p> <p>Similarly, we know adolescent boys' wellbeing is also affected by engagement with social media, albeit slightly later than girls (<a href="#">Orben, 2022</a>; see also <a href="#">Gordon, 2021</a>), and 1 in 10 15-to-16-year-old girls also claim to admire well-known misogynist influencers (<a href="#">Internet Matters, 2023</a>). There is also a need to acknowledge that the online world, to an extent, both reflects and affects life offline (e.g. 'manosphere' themes and memes emerging in schools). For example, wider research shows that 36% of girls are put off political roles because of how women are treated online (<a href="#">Girl Guiding, 2022</a>) and there is extensive existing research about greater and/or earlier impact on girls' wellbeing, while more boys feel that being online opens opportunities for them (<a href="#">Picton, 2022</a>). On page 11, there is mention of developing "robust and thorough media literacy interventions that focus on what happens online, in the moment, but also offline", and we believe that the inclusion of 'offline' in this statement is really important. Our interactions in digital spaces affect our offline lives in important ways and, sometimes, in really harmful ways (e.g., online misogyny -&gt; 'real-life' misogyny). Therefore, we agree that it is important to frame media literacy as something that is, ultimately, important for our offline lives. However, this focus is not maintained throughout the strategy and could be referenced more explicitly elsewhere.</p> <p>Overall, we agree with the focus on supporting vulnerable groups. This approach is evidenced by our own successful Sport and Literacy work and our Represent programme. Our <a href="#">Sport and Literacy work</a> helps educate young men who 'get drawn into communities', by switching the 'role models' (e.g., Andrew Tate) that they look to for more positive ones. We have built partnerships with influential bodies, such as the Premier League and the FA to help</p>

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	<p>build these positive role models and the success of this approach is evidenced by our research (see <a href="#">here</a>). Likewise, our <a href="#">Represent programme</a>, which supports 11-14 year-old girls to develop a strong voice and build their communication and relationship skills, shows that girls feel they don't have a voice that is listened to so they ask, 'what's the point?'. Represent is highly successful in supporting them with confidence, strategies and opportunities to listen effectively and have their own voice (see evidence <a href="#">here</a>).</p> <p>Due to the large body of existing evidence regarding gender and online behaviours, we suggest that it would be helpful to specify what Ofcom's focus will add to current research. For example, some areas are currently under-explored/evaluated, including:</p> <ul style="list-style-type: none"> <li>• Strategies to strengthen girls' confidence;</li> <li>• Approaches to motivating girls to take up space online;</li> <li>• Methods for disregarding or counteracting misogyny;</li> <li>• How to support other women.</li> </ul> <p>To do this, we recommend asking what young people want to get out of their online life and how current experiences act as barriers to that. In particular, we recommend exploring what girls and young women can do/are doing to support positive online interactions (e.g. algorithmic curation, social action) alongside focusing on those causing or contributing to the more negative behaviours and experiences online. Resultantly, we suggest these considerations might encourage and inspire more girls and women to engage with the digital world/ media etc. and relate more to the 'Positive Vision' of the title.</p> <p><b>Education programmes and evaluation</b></p> <p>Goal three (section 2.8), explains that: "Providing tools and guidance to better equip organisations delivering ML interventions to teach critical skills that help people identify mis and disinformation. This could be in the form of a toolkit and workshops which we would design, deliver and evaluate over the duration of the three-year-strategy". However, we question what Ofcom's role would be in this process, as the proposal depicts Ofcom will not lead "education programmes, for example, within schools (p6)". Therefore, we suggest that this aspect of the proposal would benefit from more clarification, as it seems as</p>

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	<p>though pre-existing, trusted experts may be best positioned to support with the design, delivery and evaluation of this work, but this remains unclear.</p> <p>Finally, in relation to the discussion indicators (section 2.10)--which explains that, ‘...more organisations delivering ML interventions conduct impact evaluations and share best-practice approaches’--we suggest that it is unclear whether this refers to usage based on Ofcom toolkits. As such, we would like to know if there are any more practical notes on how Ofcom is reaching/informing organisations delivering ML interventions in order to highlight the toolkit and/or more strategic work with funders. It is unclear whether the focus here is broad or only on organisations that Ofcom funds.</p>
<p><b>Question 2:</b> 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><b>Stance and reasoning</b></p> <p>The vision in the outcome --“By 2027, online services will provide better ML support for their users, more evaluation of the impact of this support, and longer-term funding for initiatives that help provide this support”--appears to suggest that responsibility for funding ML initiatives lies exclusively with technology companies, whether on-platform or by funding external initiatives (e.g. with the third sector). However, aside from ‘Be Internet Legends’ (the sole example cited) to date, most ML initiatives have been supported by government, Ofcom or more traditional sources of funding. Therefore, we question how confident we can be about whether this approach presents an effective and sustainable approach to increasing ML.</p> <p>Overall, we feel that there is considerable ambiguity around the use of the term 'interventions' in this section, particularly in relation to what exactly is meant by interventions, and how research will be turned into actionable insights for platforms to 'encourage' the platforms to make changes. This phrasing is vague and lacks direction. Instead, we need a mechanism by which implementation of insights from Ofcom by platforms is tracked/evaluated. Furthermore, the strategy mentions ensuring platforms measure impact of interventions but there is a lack of clarity on how it will ensure these interventions are taking</p>

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	<p>place. In a context in which it can be difficult to get platforms to be accountable to regulators, it seems highly important that the strategy is clear and specific in this section, or it risks being ineffective.</p> <p>In particular, we raise concerns relating to goal three (section 3.9) which discusses, “Work to ensure platforms’ funding of ML programmes”. The language used in this section is cautious and non-specific (‘promote’, ‘indirectly’, ‘development’), which suggests that tech companies will not feel compelled to do this and if they do anything, it may be considered ‘good CSR’, may be limited by the interests of the company, and not impartial. This would be improved if the grants were to be administrated and governed by Ofcom, as this would also remove opportunities for the companies to greenwash. Consequently, we suggest the language used in this section needs to be more robust to ensure relevant parties are held accountable. If this is not addressed, our concern is that the strategy risks allowing platforms to imply that they support ML initiatives with no concrete evidence of interventions taking place or their effectiveness.</p> <p>Broadly, we agree with notes on potential issues and positives (e.g. funding, pressure, relevance, credibility and innovation as discussed in 3.5 and 3.9), but it is also worth noting that many schools may have issues trusting or working with tech companies (see e.g. Bissoondath, forthcoming), even if only funding an initiative led by the third sector. Acknowledging the potential for a curriculum review in England, and the Labour Party’s intention to “introduce a broader curriculum, developing creativity, digital and speaking skills that ensure young people leave school ready for work and ready for life”, we suggest that this outcome could be presented as just one approach feeding into a broader vision. For example, it may be important to observe approaches taken in other UK and European curricula, and to include sustainable funding from government departments for initiatives designed to inform integration of effective approaches across all phases on the curriculum.</p> <p><b>Evidence</b></p> <p>A constant refrain in ML literature reviews is the inconsistency of initiatives, and this is driven by very limited and insecure funding and lack of sustainability of these approaches as a long-term solution. As such, we recom-</p>

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	<p>mend that a strategy should move more towards a sustainable approach. Currently, we feel that the insecurity of funding for ML initiatives does not feel adequately acknowledged or addressed. However, it is important to note that we believe his approach should be distinct from Ofcom leading education programmes within schools (p. 6), for example. Instead, we recommend that alternative approaches could include: testing promising interventions in a proportionate way and/or moving towards more rigorous evaluation (including, but not limited to, RCTS) to inform larger-scale delivery or embedding effective tools and techniques into teacher training and the curriculum. This feels particularly important given that, overall, the steps leading to the outlined ambition--e.g. "More children leave primary school with ML skills and attitudes that support them to have more positive and effective experiences online, via teacher training and robust evaluation of initiatives" --are unclear.</p> <p>Nonetheless, we agree with the proposal in section 3.1, that consideration should be given to including media literacy as part of measures in online safety codes of practice. However, we caution that this may risk conflation of the two terms and suggest media literacy is already 'covered' by the OSA.</p> <p>Additionally, we support the emphasis on "what users consider to be helpful ...to foster more positive experiences online" (section 3.7). Again, this is helpful framing for ML (the 'positive vision') as it needs to feel relevant to what people want to do in the digital world and what is supporting or preventing that. Similarly, it is excellent that the strategy references age-appropriate design codes.</p>
<p><b>Question 3:</b> 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>Overall, we agree with the emphasis placed on "trusted voices" in this section, based on our Communities model and Literacy Champions programmes. We also think it's important that media literacy includes the development of understanding around how to ensure wellbeing and how to access wellbeing support in digital spaces or in light of what happens in digital spaces. This section proposes that: "some initiatives that may directly target one group of children but aim for indirect positive effects on other groups. For example, work on online misogyny may directly engage teenage boys/young men, with intended benefits for teenage girls/young women as well" (p. 14). While this is important, we do not believe this negates the</p>

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	<p>need for interventions for young women and girls that focus on how to access support and protection from online dangers, online misogyny in this case.</p> <p>Furthermore, alongside prioritising “SEND, communication needs, care experience, mental health and/ or physical impairments” (section 4.5), we suggest it is also important to consider those excluded from mainstream school provision. The aforementioned characteristics are heavily represented in those who have been excluded from/are at risk of exclusion from mainstream education. A number of our programmes (e.g., Empower, Represent, Game Changers, and Words that Count) support at risk individuals with achieving highly successful outcomes. As such we agree that commissioning targeted interventions via organisations who are experts in working with target cohorts is crucial (section 4.9). Nonetheless, we do think that engaging internationally is a good idea (section 4.8) as many European countries have relevant expertise and experience in this area (see e.g. <a href="#">Tamboer et al., 2024</a>; <a href="#">Kleemans et al., 2016</a>; <a href="#">McDougall et al., 2018</a>).</p> <p>In relation to supporting ITT via universities it is important to note that the NewsWise programme has some experience with this, and we conducted a short evaluation of this work (see <a href="#">Cole et al., 2022</a>). We only collected feedback forms, rather than any evidence of the impact of the training once teachers went into the classroom, but this highlights that the approach taken should be evaluated extensively e.g. number of teachers trained and impact in the classroom. However, we would question the capacity ITT providers have to engage with digital literacy education, given the very limited university-facing time PGCE students receive, and the even more limited time dedicated to broader literacy skills development. Furthermore, issues surrounding recruitment and retention of teachers across the UK raises concerns about the capacity the workforce has to engage with additional CPD and responsibilities. Rather, it seems that a cross-sector and community-based model of working (i.e., collaboration between schools, universities, third sector institutions and relevant stakeholders) may be more feasible to ensure the embedding of critical digital and media literacy skills into the classroom.</p> <p><b>Media Literacy week</b></p>

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	<p>We believe that a Media Literacy Week could be impactful. Findings from our Empower programme suggest that dedicated time and resources significantly improve students' media literacy skills and confidence. For instance, after a focused intervention, 82% of participants felt more confident in their ability to critically evaluate online content. A Media Literacy Week could amplify these benefits by providing a concentrated period for schools and communities to focus on media literacy education, engage with various stakeholders, and share best practices.</p> <p>However, it is important to acknowledge that while a Media Literacy Week can be a valuable initiative to raise awareness and encourage participation, it may risk becoming tokenistic if not integrated into a broader, sustained effort. The Empower programme, for example, is a 10-week intervention. This extended duration allows for the gradual embedding of media literacy skills, fostering deeper understanding and retention among participants.</p> <p>Evidence from the Empower programme indicates that significant improvements in media literacy require consistent, long-term engagement to achieve sustained impact: Over 85% of students showed increased confidence in their digital literacy skills, and 80% improved their ability to identify fake news and misinformation. These outcomes were achieved through a structured, multi-week programme. The 10-week format allowed for a comprehensive exploration of media literacy topics, including critical thinking, online safety, and misinformation. This depth of learning would be challenging to replicate in a single week.</p> <p>Therefore, while a Media Literacy Week could serve as an excellent catalyst for initiating conversations and activities around media literacy, it is crucial to complement it with ongoing, targeted interventions. Schools and communities should be encouraged to integrate media literacy into their regular curricula and activities, ensuring that the skills taught during the week are reinforced and built upon throughout the year.</p>

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<p><b>Question 4:</b> Do you agree with our assessment of the potential impact on specific groups of persons?</p>	<p>Confidential? – N</p> <p>Our response to question 3 demonstrates our position on this question, but we feel it important to re-emphasise the need to support boys and young men as well as girls and young women and, also, to consider much younger age groups. Given your own research, which shows the number of 5 to 7-year-olds who have their own devices and even social media accounts, it seems crucial to build media literacy capacity across the learning continuum. One of our Senior Researchers is on the advisory group for a Nuffield-funded project lead by Cliff Manning at ParentZone which explores media literacy in the Early Years and this project could provide valuable insight into how to integrate practices from an early stage.</p> <p>As mentioned above, our Empower programme has also demonstrated significant positive impacts on students' media literacy, particularly among vulnerable groups such as girls who are excluded or at risk of exclusion from education. According to the evaluation report, 85% of the participants showed increased confidence in their digital literacy skills. Additionally, 80% of the students reported improved ability to identify fake news and misinformation. The programme's small group interventions and tailored resources proved particularly effective, with 90% of educators noting the relevance and quality of the content provided. Given these outcomes, it is crucial to continue supporting such targeted interventions to enhance media literacy among vulnerable populations.</p> <p>Additionally, the wider impact of the Empower programme highlights the importance of sustained interventions. According to the evaluation report, 95% of the teachers surveyed six months after the programme had integrated what they had learnt about media literacy into their teaching. This means that even more students benefit from their enhanced understanding of media literacy, creating a ripple effect that extends beyond the immediate participants. This evidence underscores the need for long-term, continuous support for media literacy education.</p>

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	<p>Finally, the proposal suggests that Ofcom aims to work with education departments and regulators in each UK nation to support them to develop media literacy practice in schools (e.g., establish a media literacy 'lead' in schools). However, we raise concerns that this may be highly challenging given the variety of curricula and contexts and, therefore, recommend that specialist approaches that map on to the individual curricula of the home nations is considered through partnerships with experts in the devolved settings.</p>
<p><b>Question 5:</b> Do you agree with our assessment of the potential impact of our proposals on the Welsh language?</p>	<p>Confidential? – N</p> <p>We agree that it is very important to consider the potential impact of the proposal on the Welsh language and Welsh education settings. However, it is crucial that Welsh language considerations are not tokenistic but embedded into the approaches taken to media literacy education. The proposal only references the minimum Welsh language policies and does not consider the context in which these policies, nor media literacy, function. Overall, there is a lack of clarity about how the impact of the proposed actions will be researched, measured or evaluated using robust tools that consider the nuances of the Welsh language context and settings.</p> <p>For example, if initial teacher educator programmes are to be a key site of professional development and critical literacy training/dissemination, all materials must also be available in Welsh and experts must be consulted on what mis/dis-information in Welsh language media looks like, the skills learners require to manage and critically assess this information in Welsh, and how to embed this work into Welsh language schools. Additionally, there needs to be careful consideration of whether there are any Welsh language-specific issues i.e., we know the issues of gender and misogyny online in English, but it remains unclear what evidence exists regarding the same intersecting factors in Welsh language online spaces. It is important to consider, therefore, whether the target topics, audiences and approaches are the same in Welsh as in English and, therefore, how applicable/replicable the approach is.</p> <p>Also, the proposal does not make clear the considerations/ approaches to be taken regarding media literacy education opportunities offered in first language Welsh</p>

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	<p>and second language Welsh settings. These two settings have distinct and unique challenges in part, because of the varying levels of broader literacy skills available to individuals in these groups but, also, because of the role and function of Welsh media may play in the lives of these different demographics.</p> <p>Additionally, the Welsh Government's current language policy '<u>Cymraeg 2050</u>' (a million Welsh speakers by the year 2050), and the new Curriculum for Wales, means that all schools, regardless of language medium, are using classroom technologies to support and enhance Welsh language skills. Digital literacy is also considered a cross-cutting competency across all Areas of Learning and Experience (AoLEs). However, aside from acknowledging the basic requirements of language status and function in Wales, the proposal does not outline if and how it will support Welsh language users across a variety of online settings/technologies (i.e., AI tools in Welsh function differently to those in English and access is highly varied), what media literacy might look like across the variety of contexts (i.e. English-medium schools versus dual educating schools, bilingual schools, Welsh-medium first/second language schools), and/or how robust Welsh language resources, methods and evaluations will be in supporting the development of critical digital literacy skills. Therefore, while we acknowledge the importance of the Welsh language references in the proposal, we suggest that significantly more context-based consideration is required, and that Welsh language users and experts must be consulted further as the strategy progresses.</p>