

Your response

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<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><u>Goal one and two</u></p> <p>Yes, but research should be extended. Large scale longitudinal studies need to be made on the effectiveness of media literacy interventions - there is an opportunity for Ofcom to put this in place, especially if media literacy education is mandated in schools in the UK. Ofcom already produces extremely good research on Media Lives - can this be extended to further include media literacy with a greater proportion of the population?</p> <p><u>Goal three</u></p> <p>Clarification is needed for this goal. Is this just from Ofcom commissioned projects? There are a lot of media literacy programmes that are externally evaluated. This includes The Guardian Foundation's NewsWise and Media Literacy Ambassadors programmes, which are evaluated by the National Literacy Trust and can add a wealth of understanding and good practice across the sector.</p> <p>It is good to see critical evaluation skills mentioned in this section as well as in the overview: "the ability to think critically about media and have access to different perspectives". However, this does not appear to carry through into any of the other sections, where critical thinking or analysis skills are not mentioned. If Ofcom's definition of media literacy is being updated to reflect the way that people now consume media, it should also reflect the need to critically analyse that media, e.g. "The ability to use, understand, critically analyse and create media and communication across multiple formats and services".</p> <p>Access to different perspectives is equally vital, but again this is not reflected in any of the other sections. It is particularly pertinent to working with platforms, as this is where people's access to different perspectives may be determined.</p> <p><u>Goal four</u></p>

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	<p>Yes. It is good to see a reference to proportionality when it comes to evaluation. A library of research and evaluation accessible to practitioners as well as researchers would be very helpful. Long written reports place a burden on organisations and there may be other ways of capturing learning, especially when findings have already been established by previous interventions.</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><u>Goal one</u></p> <p>This goal should go further to demand transparency and recognise the impact platforms have on the distribution of news and information.</p> <p>Ofcom should demand transparency from tech platforms about their algorithms and how they target users. In addition, there needs to be acknowledgement of their role in disseminating media including the degree of control they have over what people see in news feeds (e.g. Google Top Stories, Apple News) and on social media - without this information, it is much more difficult to achieve goals such as:</p> <ul style="list-style-type: none"> • Stopping Mis and disinformation. • Preventing harmful content and activity that disproportionately affects women and girls. • Protection of personal information. • Careful treatment of content of democratic importance. <p>The importance of the right to information as one of the UN rights of the child is mentioned in section 4.4. This also means safeguarding free and independent journalism. As platforms have an impact on this in the way they distribute information and get content from news producers - what is the requirement from platforms on that front? As mentioned above, access to different perspectives is vital for media literacy, however an individual's access can be determined and shaped by the major online platforms. What is the requirement that platforms acknowledge their role in this?</p> <p><u>Goal one and two</u></p> <p>The focus on media literacy by design may absolve platforms of their responsibility to act on the issues mentioned above, so these goals should make it clear that</p>

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	<p>this is not the case. It would be useful to see additional evidence of how and with whom media literacy by design has a positive impact. This cannot be the only action that platforms take and it must come as part of a range of different approaches.</p> <p><u>Goal three</u></p> <p>This goal should go further to ensure funding that has long term impact. 'Encouraging and exploring' seems to imply that there is no compulsion for platforms to do this so the language used needs to be stronger in this respect.</p> <p>Additionally, the strategy implies that the platforms can fund and evaluate their own media literacy programmes and interventions. Instead, they need to fund established media literacy organisations that work directly with young people and educators, offering scale, reach and long-term impact.</p> <p>As Ofcom cannot directly fund work with children and young people, this leaves media literacy organisations dependent on platform funding, so it is vital that this forms part of goal three. To ensure long term impact, there needs to be a commitment to multi-year funding for the media literacy sector.</p> <p>This goal should also acknowledge the issues that come with media literacy interventions being funded by tech platforms, particularly when it comes to the following:</p> <ul style="list-style-type: none">• Partial content designed to focus on selected features of the service.• Service only offered in selected areas which may compound inequalities.• A misleading perception that media literacy skills can be developed through a 'one and done' approach. <p>There is a risk that interventions may serve the interests of platforms. Therefore, a government body or Ofcom should set up a fund to which platforms contribute to ensure that this risk is avoided whilst also contributing to the long-term stability of media literacy funding.</p>

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<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><u>Goal one</u></p> <p>Yes, but young people must be included. Children under 10 and young people aged 14-18 should be included in the definition of participants.</p> <p>To have lasting impact, work with children and young people must be prioritised by central government, including the Department for Education (DfE). Targeted interventions are important, but it should be Ofcom’s ambition to improve and demand the media literacy of all children.</p> <p><u>Goal two</u></p> <p><i>Department for education engagement and support</i></p> <p>As above, DfE engagement is essential for this goal to happen. The idea of a Media Literacy Lead in every school has great potential, but will not have any power if Media Literacy is not recognised as a core and mandatory subject and skill-set to be applied across the curriculum.</p> <p>Teacher CPD including at ITT level is vital but again this will not be sustainable unless there is greater support from DfE to make this a priority in schools. On a practical level, training needs to be fully funded e.g. cover costs for the teacher to attend with a training pot ringfenced for media literacy. From our experience delivering CPDs, depending on teachers taking part after school or in their own time makes attendance an issue and thus reduces impact.</p> <p><i>Utilising the expertise of organisations with long term funding</i></p> <p>Currently universities are not providing media literacy training at ITT level themselves as it is not mandatory. However, media miteracy organisations are already responding to requests from institutions to provide training for students. ITT providers need to be working in partnership with media literacy organisations that have expertise in effective practice as well as experience in teacher training. This stream of the strategy needs to be fully funded.</p>

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	<p>Funding for training from Ofcom and other organisations has often been over very short periods of time. This reduces the impact or even possibility of teachers putting learning into practice with young people.</p> <p><i>Training as part of a wider curriculum commitment</i></p> <p>Attending a teacher training session on its own will not transform a school's media literacy practice - there must be a move to recognise that media literacy is a core skill across the curriculum (much like literacy across the curriculum) and schools need to be held accountable for delivering on this and showing impact on children. To achieve this, there must be support in place for how to embed media literacy successfully in a school curriculum, potentially including expertise and resources from third party providers (much in the way that computing was introduced). Ofcom should also be evaluating the benefit to the target audience of children, not just the training participants (see 4.16 'commitment to supporting ML skills for children through our training offer').</p> <p><u>Goal three</u></p> <p>We agree that digital inclusion must be achieved, but this has to come alongside critical literacy - it is irresponsible not to do both at the same time. Therefore, digital inclusion programmes must include an element of critical digital literacy as standard practice.</p> <p><u>Goal four and five</u></p> <p>We agree that the match-making service is a useful idea: Ofcom has the opportunity to bring the scattered media literacy work across the UK together, providing opportunities for organisations with complementary skills and audiences to work together and increase the impact of their activities. This has the potential to reduce the number of precarious, short-term, small-scale interventions.</p> <p>This goal should ensure that this is more than introductions. We need a strategic framework for this and a clear objective - to avoid duplication of work. This will all be dependent on funding - many small third sector organisations have precarious funding situations; this limits how ambitious they can be when delivering on this goal - how is this to be addressed?</p> <p><u>Goal five</u></p>

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	<p>It could be useful for Ofcom to act as a convener and promoter of activities taking place during UNESCO Media and Information Literacy week/European Media Literacy Week/US Media Literacy week, which all already coincide. It should not be a priority for significant resources to be devoted to this.</p>
<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 agree with the principle that “We consider that our proposals are likely to have a particularly positive impact on communities experiencing financial disadvantage, older adults, children and people with learning disabilities and/or cognitive impairment compared to the general population and help advance equality of opportunity.” and “More generally, delivery of this media literacy strategy is likely to foster good relations because an underpinning principle of media literacy is respect for different opinions. For example, any work on news literacy recognises that bias is to be expected and is neither good nor bad, but something to be aware of.”</p> <p><u>A108 and A1.10</u></p> <p>Young people aged 14-18 need to be included in the definition of participants. Research shows that this age range can be a peak time for conspiracy theorising, with “conspiracy thinking” heightened at age 14 (Jolley et al., 2021)</p> <p>Teenagers are significantly more likely to believe online conspiracy theories than older generations (Center for Countering Digital Hate 2023)</p> <p>We welcome the recognition of children with special educational needs and disabilities as a prioritised group. (4.4)</p> <p>To have a lasting impact with specific targeted groups and communities, there needs to be a commitment to facilitate multi-year funding for interventions for all groups, and work with young people must be prioritised by central government including DfE.</p> <p>Targeted interventions are important, but it should be our ambition to improve the media literacy of all children and young people.</p>

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Question 5: Do you agree with our assessment of the potential impact of our proposals on the Welsh language?	Confidential? – Y / N