

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>We welcome the aim of ‘exploring the insights from our current project with first-time voters’, and that the work will be focused on <i>‘content of democratic importance, looking at exposure to mis and disinformation and generative AI, in an election year’</i>.</p> <p>As some devolved organisations such as in Wales & Scotland allow persons to vote from the age of 16, we would suggest that this study take a particular look at whether the impact of mis and disinformation and generative AI is greater on underage voters than it is on voters over the age of 18. This would help support the various consultations that are going on in the context of the implementation of the Online Safety Act, and identify whether there should be greater protections afforded to younger voters online.</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>We welcome the suggestion that Ofcom could <i>‘exercise [its] influence to celebrate online services demonstrating leadership.’</i> We would like to see more detail as to how Ofcom would propose to do this, and agree that there is value in promoting sites and platforms which implement measures that go above and beyond guidance and requirements.</p> <p>We would point out that Ofcom suggests ‘encouraging online services to fund third-party interventions direct to users’, but that it also says elsewhere in the text that <i>‘organisations that are funded by platforms and delivering media literacy initiatives or resources face a number of challenges that limit their full potential. These include fragile and short-term funding agreements, a constant pressure for ‘new’ content, and potentially selective or partial content created to suit brand values rather than user needs.’</i> Therefore, we would welcome suggestions from the regulator on how some of these limitations can be overcome.</p> <p>We note that <i>‘digital identity’</i> is mentioned in parts of the documents (4.6 and A1.13). We note that this term also appears once in Ofcom’s ‘Future technology and media literacy’ ‘Anchor document’ published on 28 June</p>

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	<p>2023 (https://www.ofcom.org.uk/_data/assets/pdf_file/0025/263374/Anchor-Document.pdf), but is not defined.</p> <p>However in Ofcom's 'Plan of Work 2024/2025' 'Making communications work for everyone' published on 26 March 2024 (https://www.ofcom.org.uk/_data/assets/pdf_file/0020/281630/Statement-Plan-of-Work-2024-25.pdf), digital identity is mentioned alongside other technologies such as artificial intelligence and extended reality.</p> <p>We would suggest that there should be an alignment of terminologies across the various groups within Ofcom in order to avoid confusion, and would welcome clarity on what 'digital identity' is intended to refer to in the context of media literacy. In a recent consultation by HM Treasury titled 'Improving the effectiveness of the Money Laundering Regulations', 'digital identity' is defined as 'a digital representation of you and facts about you. It lets you prove who you are during interactions and transactions. You can use it online or in person.' In Ofcom's recent 'Third phase of online safety regulation', digital identity is also understood to refer to a technology that can be used in the context of 'identity verification for adult users'</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>We support proposals to set up a 'a future technology trend ad-hoc working group of experts', particularly as we believe it will be important to help the public understand and feel comfortable with the technologies that will be relied upon to implement the Online Safety regime.</p>
<p>Question 4: Do you agree with our assessment of the potential impact on specific groups of persons?</p>	

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<p>Question 5: Do you agree with our assessment of the potential impact of our proposals on the Welsh language?</p>	