

## Your response

Question	Your response
<p><b>Question 1:</b> We include labels, overlays, pop-ups, notifications, and resources as examples of on-platform interventions (additional information regarding this typology can be found in the Annex on page 3).</p> <p>(a) Do you agree with this categorisation of on-platform interventions?</p> <p>(b) If not, please explain.</p>	<p>Confidential? N</p> <p>While the typology itself seems to be offering on-platform interventions, it is important to be aware that many people do not critically engage with them and experience ‘click-fatigue’, which results in ignoring important aspects of these interventions.</p> <p>In addition, and importantly, there are other types of interventions that are missing:</p> <ol style="list-style-type: none"> <li>1. These interventions are not promoting critical thinking, or Data Thinking, as we call it in our Nuffield Foundation funded project <a href="#">Me and My Big Data</a> . This involves: understanding how these platforms are funded and how that influences what they see and interact with, understanding their privacy and which measures they can use to control and manage that, understanding how web-cookies work, and <a href="#">how the newsfeed algorithms change</a>.</li> <li>2. As many Big-Tech companies have been having long disputes with newspapers across the world about various topics, it is problematic to rely on these platforms to be able to provide reliable resources and especially if those clash with their economic or political interests.</li> <li>3. Because these interventions are designed for all people in the same way, this one-size-fits-all approach will exclude many people who have various types of marginalisation characteristics such as: economic, education, different types of mental and physical disabilities and even age. As we showed in <a href="#">the final</a></li> </ol>

	<p><a href="#">report of the Me and My Big Data</a> project, the majority of the population does not even know what data are, which organisations spy and trade their data and what they can do with it. Therefore, the basic assumptions that many people have different types of understanding and therefore can make informed choices, just like the with <a href="#">the flawed consent mechanism</a>, is wrong.</p> <p>4. Importantly, the on-platform interventions are not providing what we call <a href="#">Data Citizenship literacies</a>, which means educating people on their data rights, what they can do if they want to <a href="#">mobilise against these Big-Tech companies</a> as communities and individuals.</p>
<p><b>Question 2:</b> Do you have any feedback on the summary of themes we identified from online services? Are there any omissions or other items you think important to add?</p>	<p>Confidential? N</p>
<p><b>Question 3:</b> Are we missing anything with the three headings used to structure the best practice principles for media literacy by design?</p>	<p>Confidential? N</p> <p>The principles outlined in the call include 1) priority, transparency and accountability; 2) user centric design and timely interventions; and 3) monitoring and evaluating.</p> <p>In relation to principle 1, while transparency is an important step, it is not enough, and as I explain below many times manipulated by platforms. Therefore, the accountability aspect here is crucial – what measures will Ofcom take if platforms fail their obligations? At the moment, the main penalties that are offered are financial. But since these platforms have been fined by multiple regulatory bodies across the world and have continued their problematic conducts, this has proven to be inefficient. Therefore, what is Ofcom going to do to make sure platforms are accountable?</p>

	<p>In relation to principle 2, interventions should be user AND citizen centric. That means making sure that all types of users are included (of all ages, abilities, economic and education backgrounds). It also means making sure citizens rights are at the forefront of these literacy initiatives, and not just trying to turn people into better consumers or workers.</p> <p>In relation to principle 3, there is a need for more clarity on what kinds of tests and evaluations will be conducted. Many platforms do not, or have recently fired their ethics committees which means that ethics is not on their priority. Many platforms do not have ethics procedures like academics do, and conduct research that harms people in various ways (more on this below). This means that monitoring and evaluations should be conducted by professionals, such as academics, who are not motivated by financial gains and have more knowledge and understanding about laws, ethics and the implications of technology on people's lives.</p>
<p><b>Question 4:</b> Which aspects of the proposed best practice principles for media literacy by design work well, and why? Which aspects don't work so well, and why? Do you have any comments on the specific principles (please specify if providing feedback on individual principles)?</p>	<p>Confidential? N</p> <p><b>Aspects that don't work well</b></p> <p><b>1<sup>st</sup> principle</b> – there is an overreliance on online services transparency and self reporting which have not proven themselves so far. Scholars have shown, for example, <a href="#">the digital consent</a> mechanism does not provide enough information to make informed decisions, and that projects meant for transparency such as Facebook's Overlay of 'Why am I seeing this ad' or the <a href="#">ads archive</a> have not provided enough data about why <a href="#">and how</a> people have been targeted. Other scholars <a href="#">have shown</a> that many consent pop-ups have deceptive design, what is commonly known as dark patterns, and that only around 10% meet the minimal requirements based on European law.</p> <p>This means that online services cannot be trusted to measure the success of their interventions and there needs to be external auditors (from Ofcom and academia) to make</p>

	<p>sure these are applied according to the regulations.</p> <p><b>2nd principle</b> – Again designing interventions according to online services metrics is problematic, this is mainly because as I show in my book <a href="#">Media Distortions</a>, companies like <a href="#">Facebook have been skewing various types of metrics</a> to their advantage (mainly deceiving advertisers, some advertisers are suing both Meta and <a href="#">Google for this</a>). Since online services metrics are not regulated by an external auditor, and only rely on this practice to make any decision is problematic, because online services have proven not to provide reliable metrics, and to operate according to their economic interests.</p> <p><b>3<sup>rd</sup> principle</b> – interventions are monitored by who? Again, online services are motivated by economic incentives and as mentioned above have proven to be unreliable in their transparency and metrics reporting. External auditors from both Ofcom and academics are needed annually to make sure online services are conducting their goals appropriately.</p> <p>Furthermore, ‘experimentations’ as mentioned here can have huge consequences to people’s wellbeing, as I mentioned in <a href="#">my book</a> and <a href="#">elsewhere</a>, Facebook’s experimentations have always been about keeping users engaged on their platforms for longer time. This has also been exposed by <a href="#">multiple journalist</a> and <a href="#">whistleblowers</a> showing that Facebook knew their features harm people’s mental health and overall experience and continued with them because it meant people engaged more. Just like academic experiments require ethics forms so should online services, and these should be examined, again, by OfCom and academics to approve and monitor.</p>
<p><b>Question 5:</b> Do you have any further guidance/feedback to offer on how platforms can enact best practice media literacy by design?</p>	<p>Confidential? N</p> <p>Putting the responsibility on online services is the wrong way moving forward. Online services are commercial entities whose main goal is to make more money by keeping people on their platform. This is usually conducted by using various types of dark patterns and manipulative algorithmic ordering which influence people’s</p>

	<p>decision in the wrong way. For example, just last month <a href="#">a few consumer organisations in Europe have filed a complaint against Meta</a> for it's deceptive practices - Meta has been rolling out changes to its service in the EU in November 2023 which demands Facebook and Instagram users to, either consent to the processing of their data for advertising purposes by the company, or pay in order not to be shown advertisements.</p> <p>The way forward is by providing independent education to different groups which is not dependent or influenced by commercial actors, not only about how people should navigate online but also what are their <a href="#">data citizenship/</a> data rights.</p>
<p><b>Question 6:</b> Can you submit any case studies or examples of different services enacting any of these best principles for media literacy by design? Can you provide any other examples of best practice media literacy by design that may not be covered by this document?</p>	<p>Confidential? N</p> <p>These are usually done by external companies, such as:</p> <p>Privacy friendly browsers like <a href="#">Brave</a> automatically reject cookies and other spying technologies.</p> <p>The Electronic Frontier Foundation's (EFF) web add-on <a href="#">Privacy Badger</a> blocks spying technologies when browsing on different applications, it provides Overlays on these objects and warns people that if they click them then they may be subjected to online surveillance.</p> <p>There is also <a href="#">"Terms of Service; Didn't Read"</a> which is a user rights initiative to rate and label website terms &amp; privacy policies, from very good (Class A) to very bad (Class E). This extension shows this rating for rated websites by an unintrusive icon in the address bar. You can click on this icon to get a list with the most important rated points of the website's term of services. Additional the extension will warn you when you visit for the first time a website with a bad rating.</p>
<p><b>Question 7:</b> How do you expect in-scope services to demonstrate that they have adopted the principles? What would this look like?</p>	<p>Confidential? N</p> <p>By annual auditing of OfCom and academics.</p>

	Academics from multiple universities should form an Audit Committee chosen by OfCom and changed every 3 years to review various online services according to academics speciality.
<b>Question 8:</b> What more can be done to encourage services to promote media literacy by design?	Confidential? N
<b>Question 9:</b> How do you envisage the proposed services in scope of this work, and in particular their design elements as they relate to the promotion of media literacy, changing and evolving within the next 5-10 years?	Confidential? N