Your response

Question	Your response
Question 1: 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). (a) Do you agree with this categorisation of on-platform interventions? (b) If not, please explain.	We agree with the inclusion of labels, overlays, pop-ups, notifications, and resources as a mean to educate the user, compliment the safety process whilst using the app. However, certain criteria should also be taken into account: • **User Experience Disruption**: Frequent or poorly timed interventions (like pop-ups or notifications) can disrupt the user experience, leading to irritation and disengagement. • **Accessible**: The content should be accessible for all users of platforms, ensuring a cultural and learning difficulty friendly language in certain cases. Designing with a user/youth-centric approach is key to encouraging meaningful interaction. • **Engagement**: The content within labels, pop-ups, and overlays should be crafted to be engaging. Additionally, it is essential to consider user involvement and feedback, ensuring differentiated experiences that are age appropriate. Furthermore, this educational initiative should extend beyond the platform, supported by wider media literacy campaigns, and education programs. Some examples of our education programmes: ([Project Evolve](link), [Guides](link), [SEND](link))
Question 2: 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?	We agree with the majority of the themes, and we think it is particularly useful to draw on the cross-collaborative approach which is our main working method at UKSIC (UK Safer Internet Centre). Perhaps an omission could be access to digital devices in the first place particularly with the rising living costs families may not be able to afford internet costs, or electronic devices. There

	is a direct link between poverty and the lack of media literacy which seems to be getting worse in the UK in the past year, as the gap between the haves and the have nots seems to widen. According to Nominet and their [Digital Youth index](#) 2023 "Digital poverty is increasing up to 2 million young people in the UK now lack access to a device suitable for their education". A human rights approach to media literacy and online safety is therefore necessary, particularly since digital rights and access are an integral part of realizing one's potential through education, work, and socialization. Feedback loops additionally, could also consider age assurance technologies and partnerships with civil societies who can provide age relevant resources and material.
Question 3: Are we missing anything with the three headings used to structure the best practice principles for media literacy by design?	We agree with all three and would also like to complement particularly (*Evaluation and Monitoring) the* idea that leveraging AI tools holds promise as a means to enhance existing media literacy tools, as exemplified in [ProjectEVOLVE](#). **User-Centric Design and Timely Interventions** We propose the introduction of resources and materials aimed at empowering users and recipients with the requisite skills. The objective is to enable them to conduct media literacy lessons and, consequently, educate others on relevant media literacy issues. This approach aims to establish a cascade effect, fostering an expanded reach of media literacy within a digital literacy framework, as evidenced by initiatives such as the [Childnet Digital Leaders Programme](#). We would also like to see an inclusion of the tech industry and in general the private sector as contributors to media literacy and digital access. The [Digital Poverty Alliance](#), which consists of charities and tech companies shows that a collaborative approach can be beneficial.
Question 4: 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)?	We agree with the general approach, but we would like to specifically point out that these principles and recommendations should not be taken in isolation but should instead form a wider framework of media literacy that will include civil society organisations, the government, and the tech industry.

Prioritisation, Transparency, and Accountability in Implementation:

The complexity associated with implementing a media literacy policy may pose challenges for smaller platforms, given their limited resources and capacity.

Measuring Impact: Defining clear and effective benchmarks to assess the impact of media literacy interventions is inherently difficult due to the multifaceted nature of the concept.

User-Centric Design and Timely Intervention:

Determining the optimal timing for delivering information relevant to users' actions requires a careful balance to prevent overwhelming or irritating them. Additionally, the importance of continuous user engagement post-implementation is critical but may not be explicitly stated.

Cultural and Language Diversity: Addressing the needs of users from diverse cultural and linguistic backgrounds is vital for achieving truly inclusive design.

Privacy and Security: Ensuring that user-centric design prioritises privacy and security, especially when collecting feedback and data for improvement, is paramount.

Scalability: Developing strategies to scale interventions to accommodate growing user bases and evolving platform functionalities is essential.

User Education: In addition to intuitive design, explicit efforts in user education are necessary to enhance digital literacy and platform understanding.

Monitoring and Evaluation

Resource Constraints for Smaller Services: Smaller platforms may face challenges in implementing robust testing, such as A/B testing, due to resource limitations. Relying on observation and self-reporting may not provide the same depth of insight. Perhaps an external resource could provide a service that could accommodate such a function to assist smaller services and organisations.

	Measuring Long-Term Effects: Assessing the long-term impact of interventions is challenging, particularly when immediate behaviour changes may not accurately reflect enduring understanding or habits.

Causal Relationship Establishment: Establishing causal relationships between interventions and behaviour changes may require sophisticated research methodologies beyond the reach of many services.

Standardised Metrics Across Platforms: Developing and agreeing on standardised metrics for benchmarking across different services is challenging due to the varied nature of platforms and their user demographics.

Data Privacy and Ethical Concerns: Rigorous monitoring and evaluation processes must strike a balance between the need for comprehensive data collection and considerations related to user privacy and ethical concerns. |
| **Question 5:** Do you have any further guidance/feedback to offer on how platforms can enact best practice media literacy by design? | **User centric design and timely interventions**

In our extensive project experience, we advocate for the implementation of age-appropriate documentation and terms and conditions. Specifically, for platforms where 13-year-olds can access and create accounts, simplifying complex terms and conditions becomes imperative. Often, these documents are skipped due to their complexity, necessitating a streamlined and accessible approach. Utilising the Gunning Fog index provides a valuable framework for categorising age-appropriate terms and conditions that are engaging, accessible, and contribute to user safety.

Monitoring and Evaluation

This approach ensures that users actively contribute to platform changes, fostering a collaborative and responsive environment. Furthermore, recognising the pivotal role of civil societies in the realm of media literacy, we advocate for fostering support and partnerships with tech companies. Encouraging collaborative efforts through interactive tools and resources is essential to address the escalating the need for media literacy in an increasingly digital landscape. |

Question 6: 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?	We would like to focus mostly on the second part of the question and to provide two case studies that reflect on the issue of digital literacy.

Education

We have stressed the importance of including media literacy in school settings and the education curriculum particularly in the ages when children are digitally active. ProjectEVOLVE is a toolkit aligned with the UKCIS (UK Council for Internet Safety) framework "Education for a Connected World" (EFACW), encompassing knowledge, skills, behaviours, and attitudes across eight strands of online experiences from early childhood to age eighteen. Mapped to age and progress, these competencies guide educators in discussing areas with children as they navigate online technology. We aimed to avoid prescriptive activities instructing students on what actions to take or avoid. Instead, our goal was to facilitate meaningful discussions through well-formulated questions complemented by accessible and informative content, aiming to shape critical thinking and dispel misconceptions. This comprehensive approach was consolidated into a toolkit designed for easy navigation, presenting a significant resource to teachers and students.

Peer-to-Peer

The second case study refers to the notion of creating a cascade of media literacy by equipping young people themselves as instructors of digital safety. The Childnet Digital Leaders Programme offers schools an interactive online platform for primary or secondary education, empowering students to become online safety peer mentors, and has received positive feedback, with 85% of participating teachers noting its efficacy in fulfilling safeguarding duties. The impact report of the 2023 activity demonstrates the program's effectiveness, with all surveyed teachers believing that peer-to-peer media literacy sessions were more effective. Additionally, 76% of participants stated that the training helped them to keep themselves safe online.

| **Question 7:** How do you expect in-scope services to demonstrate that they have adopted the principles? What would this look like? | It is certainly a complicated and rigorous process to ensure that platforms have adopted the principles that are outlined in the report. The key is to base the recommendation not on isolated measures but rather on a series of steps that need to be taken to ensure that the users can achieve a certain level of media literacy. At the same time, we also need to expand on the current operation with regards to digital literacy in education settings. Another integral part is also the revision of the terms and conditions and codes of practice which should be deemed as age appropriate and accessible for children.

Evolving Nature: As previously mentioned, we advocate for the industry to embrace measures encompassing multiple steps to enhance media literacy. Notifications, pop-ups, and other services should be delivered promptly, ensuring that the information provided is continually evolving and updated. The implementation of technologies that for example identify key words can facilitate the deployment of resources in a timely and secure manner. Additionally, it is crucial that the provision of media literacy services extends beyond the initial terms and conditions during sign-up to actively accompany and support users throughout their interaction with the app.

Regular Updates:

Ensuring a consistent flow of updates regarding the implementation and efficacy of the principles is paramount. This practice highlights a commitment to continuous improvement and keeps stakeholders informed of progress.

User Engagement and Transparency:

Actively engaging users through dedicated feedback channels and maintaining transparency about how their input influences policy and design decisions are critical components. This approach fosters a sense of collaboration and builds trust with the user community.

Collaborative Initiatives:

Participating in collaborative initiatives with other services, experts, and stakeholders is instrumental. Sharing and learning best practices |

through these partnerships contribute to a broader understanding of effective strategies within the industry.

Independent Validation:

Demonstrating commitment to transparency and accountability involves submitting to independent audits or reviews. This external validation serves to authenticate the effective application of these principles, further bolstering trust and credibility.

Question 8: What more can be done to encourage services to promote media literacy by design?	**Legislation and Compliance**: Implementing regulations that mandate media literacy initiatives as part of service offerings, with clear guidelines and compliance requirements. The Online Safety Act should be the beginning of many measures that will ensure greater transparency and online safety. **Financial Incentives**: Offering tax breaks, grants, or other financial incentives to services that successfully integrate media literacy into their design. This could also be expanded to charities, civil societies and other institutions that could develop digital platforms and tools. **Funding for R&D**: Allocating funds specifically for research and development in media literacy, encouraging innovation in this area. Universities and education settings could play a central part in that, also noting the adoption of a collaborative working method which is mentioned in part 2 of the report. **Media Literacy as a Value Proposition**: Encouraging services to view media literacy not just as a compliance requirement but as a core value proposition that can attract and retain users. A media literate user will use the app more safely and that also in turn benefits the social network. **Promoting Good Practices:** As mentioned in the report, it is a competitive industry where companies constantly try to stand out so perhaps another aspect to look at is to reward those that stand out with their literacy resources as the user actually can gain skills from using the platform, this could act as a motivating factor for other companies to follow.

Question 9: 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?

Our perspective underscores that media literacy is not isolated but rather should extend beyond the users of specific services. It is our belief that media literacy should be integrated into all aspects of our lives, recognising that it is not confined to a specific context.

Media literacy holds significant importance, especially as the number of internet users increases, with a simultaneous decrease in age. It is crucial to highlight that, without effective media literacy programs and processes, many provisions for digital safety may be inadequate.

Through our publication England Schools Online Safety Policy & Practice Assessment 2023 we raised concerns about the quality and effect of staff training with regards to media literacy. It is noteworthy that slightly more than a third of schools lack effective staff training, despite it being a statutory requirement for all educational institutions. Without adequately trained staff, the likelihood of successful implementation of online safety practices is significantly reduced. Furthermore, effective online safety practices necessitate collaboration between schools and other stakeholders, including parents and local agencies, as schools alone cannot address all issues comprehensively.

Artificial Intelligence

It is also particularly important to adapt to technological developments particularly with regards to generative A.I which is rapidly becoming a daily part of children's lives. The OFCOM Online Nation 2023 illustrated exactly that with "Seventy-four percent of online 16–24-year-olds said they used a generative AI tool". The proposed services and notifications should provide a strong framework that will also be adaptable particularly with regards to children and the use of AI tools that include chat bots, search engines and other.

Parents, Guardians and Professionals

Parents and carers should be equipped with the necessary skills to support their children in challenging situations. Given that parents are typically the primary point of contact for internet safety, it is essential to ensure that they possess the essential skills to effectively support their children. Early indications from our upcoming research, scheduled for publication in February

for [Safer Internet Day 2024](), highlight parental concerns regarding the online rights and safety of children in the future. It is imperative that the voices of both youth and parents are heard and included in discussions surrounding online safety and well-being. Our efforts via the [Professionals Online Safety Helpline](), accessible to professionals working with children, have managed over 10,000 contacts, and addressed more than 7000 online safeguarding issues. This underscores the importance of integrating media literacy not only within the realm of app or service users but also across all educational and professional settings, particularly those involving children.