

How to promote Media Literacy

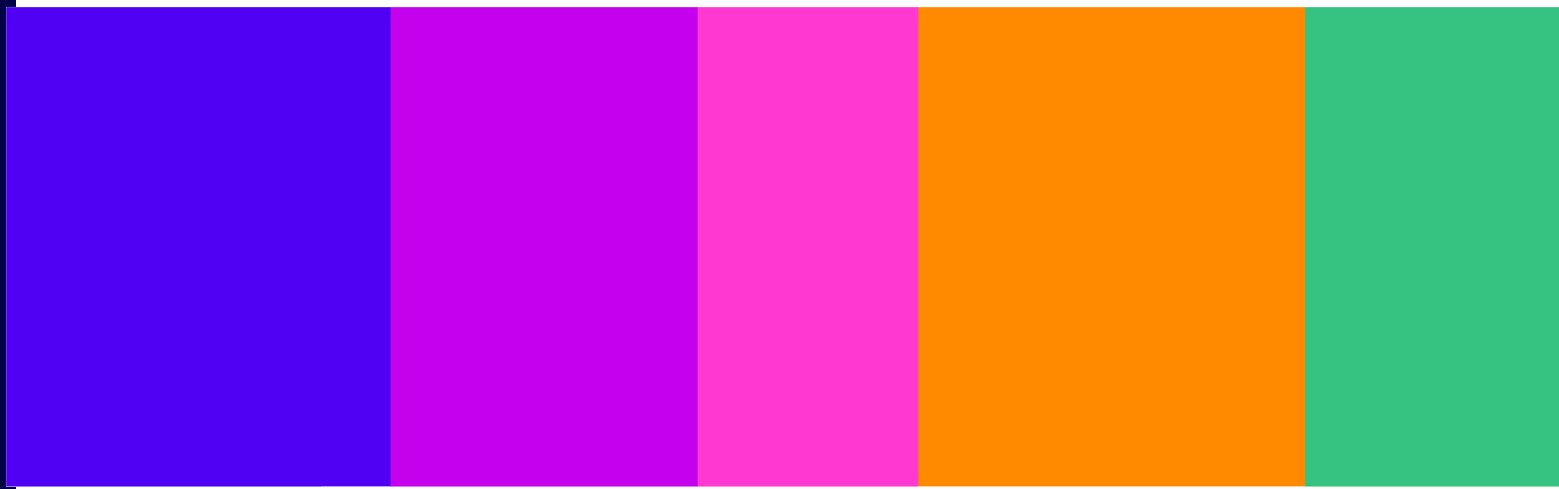
Consultation on recommendations for
online platforms, broadcasters and services

Consultation

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For more information on this publication, please visit [ofcom.org.uk](https://www.ofcom.org.uk)



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Foreword

In today's increasingly interconnected digital landscape, empowering people to navigate content safely and to flourish across media formats is more important than ever. People who are given the right skills, understanding and tools can take control of their online experiences, decisions, and actions, rather than having those decisions made for them. This is what media literacy is – a foundational skillset that empowers people and should be encouraged, rather than inhibited, by the way services are designed.

The Communications Act 2003 ('the Act') sets out our duties to promote media literacy and requires us to publish a statement recommending ways in which others, including user-to-user and search services regulated under the Online Safety Act 2023 (OSA), might develop, pursue and evaluate activities or initiatives relevant to media literacy. This consultation explains how we will meet that requirement by proposing a unified approach to empowering people in the context of how they engage with content and media across broadcast and online services.

Traditionally, broadcast regulation has largely focused on television and radio content to ensure the delivery of trustworthy and valued media, while online safety has evolved to address the specific risks posed by online services and to help keep users safe. However, people increasingly engage with these environments in a blended, seamless way. Media literacy is then fundamental for empowering people to benefit from the UK's legacy of world-class media, while also equipping them to navigate and thrive in a rapidly evolving digital landscape where emerging technologies (such as Generative AI¹) transform how we engage with content.

The recommendations set out in this consultation document address a broad spectrum of issues and highlight the scale of the challenge: we believe progress is still needed and we set out our expectations of industry in delivering positive outcomes for people. But they also present a range of simple and often common-sense actions that service providers can take to empower people. In some cases, these expectations reaffirm standards we have articulated elsewhere. In others, they reflect examples of good practice being demonstrated by parts of the industry. And in some instances, they go further, illustrating what user-focused, forward-looking practice can look like.

While these recommendations are not mandatory rules, we encourage service providers to follow them. Our recommendations are intended to be proportionate, (for example, small service providers might adopt the recommendations with different actions than the largest service providers) and have relevance to a wide range of different service providers.

Our recommendations offer a blueprint for how service providers² can contribute to a more empowered, resilient and digitally confident public who can critically engage with the content they see. Consider the experience users have where services embrace these recommendations: from the moment of sign-up, they are clearly informed about how content is curated and served. Settings and tools to manage their experience are intuitive, accessible, and designed with simplicity in mind and strong privacy defaults are in place, particularly for children. Throughout the user journey, this service actively promotes trusted educational content, partners with expert organisations and invests in media literacy initiatives that reach and reflect the diversity of UK communities. Crucially,

¹ <https://www.ofcom.org.uk/media-use-and-attitudes/media-literacy/what-does-ai-change-about-the-information-environment-that-will-impact-media-literacy-skills>

² See Chapter 3 to understand which entities are subject to these proposed recommendations.

it evaluates the effectiveness of its approach, regularly assessing the impact of its design choices and media literacy efforts to drive continuous improvement.

In contrast, on services that fail to adopt these recommendations, settings may be hidden, explanations about content curation may be absent, and people may struggle to manage their experience or identify reliable information when it matters most. These services risk leaving people, especially children and underserved groups, without the support they need. The difference in outcomes is clear and underscores the role proactive, user-centred design and investment in media literacy can play in creating a safer and more informed life online that everyone can embrace with greater confidence.

1. Overview

- 1.1 Ofcom is the UK's communications regulator, overseeing sectors including telecommunications, post, broadcast television, radio and online services.
- 1.2 Ofcom's mission is to make communications work for everyone. Since our inception in 2003, researching and promoting media literacy has been an integral part of our work. We also have a statutory duty to promote media literacy as set out in section 11 of the Act.
- 1.3 Giving people more control over their online experience is a strategic priority for Ofcom as set out in our [Online Safety Roadmap](#), and we see media literacy as an essential component of this. Our [Three-Year Media Literacy Strategy](#) explains how we will exercise our duties. This consultation document sets out our proposed statement of recommendations which is one of the principal strategic deliverables in the first year of the strategy. Our proposed recommendations also build on our [Public Service Media Review](#) (PSMR) published in July 2025 which set out our thinking on how Public Service Broadcasters (PSBs) and large commercial broadcasters can contribute to media literacy in the UK.
- 1.4 Chapter 4 sets out a clear vision for how service providers can contribute to improving media literacy across the UK. We outline a framework for action that reflects our commitment to empowering people and fostering a safer, more informed online environment.

What are our aims for these recommendations?

- 1.5 At the heart of the proposed recommendations are four high-level aims. These aims are that:
 - a) Services are designed to give people meaningful choice in how they engage with content.
 - b) People are empowered to shape and control their own experiences.
 - c) People are supported to develop critical engagement skills, building trust and confidence.
 - d) There is continuous improvement on these topics through on-going evaluation.
- 1.6 These aims are relevant to our regulatory objectives across broadcasting and media and the focus areas of our Online Safety work.³ Our goal is not only to influence those services with the largest reach or posing greatest risk, but to encourage good practices across the sectors.
- 1.7 We recognise that service providers vary in size and reach. Our proposed recommendations are intended to be proportionate, for example, we do not expect small service providers to take the same actions as the largest service providers. We acknowledge that while some of the largest service providers are already aligning with these proposed recommendations, other players are just starting to consider how they can promote media literacy amongst their users.

³ The four areas of focus, as explained in our [Online Safety roadmap](#), are: governance, design, choice and trust.

- 1.8 The proposed recommendations are not a set of mandatory rules. Rather, they represent a statement of good practice intended to help service providers understand how they can promote media literacy. We identify 10 key areas where action by online platforms, broadcasting and streaming services can make a meaningful difference in empowering people (see Figure 1 below).
- 1.9 This is an opportunity to adopt best practice in promoting media literacy by providers of regulated online services (including user-to-user and search services), broadcasting and streaming services⁴ and generative AI services. Their services shape how we engage with the world around us, and with that influence comes responsibility. Implementing these proposed recommendations is an opportunity to build trust, empower people, and contribute to a healthier digital environment. We invite service providers, and society at large, to join us in this mission to make communications work for everyone.

Who should follow these recommendations?

- 1.10 The proposed recommendations are aimed at a broad range of entities that enable the creation, hosting, and distribution of content and media that reach significant UK audiences through broadcast, on-demand and online platforms, including social media and streaming services.⁵ This unified approach recognises that people switch seamlessly when engaging with analogue and digital content across these services.
- 1.11 Online platforms are the architects of online tools that shape user experiences; and broadcasters are influential sources of news, content and information with the ability to reach more people, which makes them a vital channel for advancing media literacy at scale. Both service providers can achieve more and go further, and we welcome their engagement with these proposed recommendations.

What are we proposing?

What we are proposing

We are proposing that service providers act on recommendations in 10 areas set out below. Proposed recommendations 1-5, and 8-10 are for all services, proposed recommendation 6 is specific to online platforms and proposed recommendation 7 is specific to broadcasting and streaming services. Figure 1 presents the high-level recommendations, each of which are supported by more detailed recommendations outlined in Chapter 4.

Design for better user choice

1. **Embed media literacy by design**, making inclusive design choices a foundational principle in service architecture and policy
2. **Offer clear, meaningful choices and transparent information** at key points in the service experience

Empower people during use

⁴ For example: PSBs, including their video-on-demand (VoD) services; other licensed broadcasters (non-PSBs), VoD, including subscription video-on-demand (SVoD) services and ad-supported video-on-demand (AVoD) services; free ad-supported streaming TV (FAST) channels, and streaming/online services, including online TV, radio and audio platforms.

⁵ See Chapter 3 to understand which entities are subject to these proposed recommendations.

3. **Equip people with practical tools** to manage and personalise their online experiences
4. **Empower people with the knowledge, skills and confidence** to understand, interpret and critically assess the credibility of the content they encounter
5. **Empower and support parents and caregivers** to guide and support younger users in age-appropriate and meaningful ways
6. **Empower, engage and enable expert third parties** to provide enhanced support, helping to extend the reach and impact of media literacy efforts

Build trust beyond the service

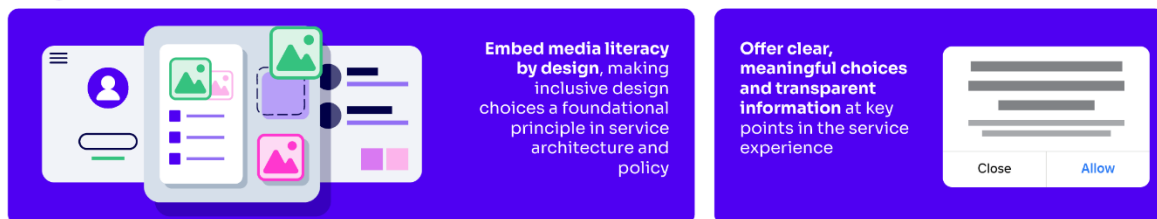
7. **Help people understand, interpret and assess the credibility of information** by creating and/or promoting relevant programming or educational content
8. **Promote media literacy beyond their services**, investing in campaigns, content, and partnerships that promote media literacy skills
9. **Support the media literacy of underserved and diverse audiences**

Evaluate what works

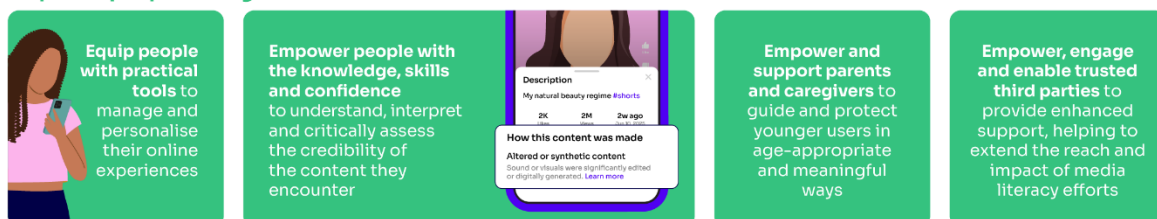
10. **Conduct and publish evaluations** of the impacts of their choices and activities

Figure 1: Our proposed recommendations

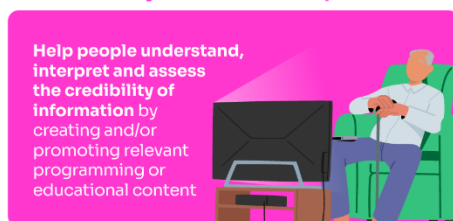
Design for better user choice



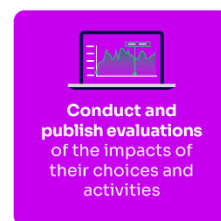
Empower people during use



Build trust beyond the content platform and service



Evaluate what works



Next steps

- 1.12 We are consulting on the proposals explained in Chapters 3, 4 and 5, which cover the proposed targeted services, proposed recommendations and Ofcom's impact assessments.

We invite stakeholder to submit their views by 8 December 2025. We will publish a final set of recommendations, incorporating feedback received, by the end of the financial year.

- 1.13 We intend to revisit and update the statement of recommendations over time as legislation and technology continue to evolve, to ensure they remain relevant and effective.

2. Background

Media Literacy as a strategic priority

- 2.1 Media literacy is a key part of our mission to make communications work for everyone. We define media literacy as “the ability to use, understand and create media and communications across multiple formats and services”.
- 2.2 In our recently published [Three-Year Plan](#), we identified media literacy as one of our cross-sector strategic priorities. This commitment is further detailed in our [Three-Year Media Literacy Strategy](#) which outlines our three strategic priorities namely: Research, Evidence and Evaluation; Engaging Platforms; and People and Partnerships; and sets out how we will exercise our duties. This document is particularly relevant to the Engaging Platforms priority, where we committed to engaging with online platforms and broadcasters on their role in supporting media literacy through their services. And this document represents one of the principal strategic deliverables in the first year of the strategy.
- 2.3 Giving people more control over their online experience is also a strategic priority for Ofcom as set out in our [Online Safety Roadmap](#), and we see media literacy as an essential component of this.
- 2.4 These proposed recommendations also build on our [Best Practice Principles \(BPP\) for Media Literacy by Design](#), published in 2024, which set out what constitutes best practice for the promotion of media literacy on platforms and informs many of the proposed recommendations in this document, particularly in relation to how services are designed⁶ and the [PSMR](#), published in July 2025, which set out our thinking on how PSBs and large commercial broadcasters can contribute to media literacy in the UK.

Legal context

- 2.5 Section 11(1) of the Act places a statutory duty on Ofcom to promote media literacy. Specifically, it requires us, among other things, to take steps to bring about or to encourage others to bring about a better public understanding of the nature of material published by means of electronic media, how it is selected and accessed, and the tools available to control it. It also requires us to encourage the development and use of easy-to-use technology that supports user control over such material published by means of electronic media.
- 2.6 The OSA provides greater clarity and specificity to our media literacy duties, particularly in relation to regulated online services. Among other things, the OSA introduced section 11(1D) of the Act, which requires us to publish a statement recommending ways in which others might develop, pursue and evaluate activities or initiatives relevant to media literacy in relation to regulated user-to-user and search services.⁷

⁶ In October 2024 we announced that Google Search, The LEGO Group, Pinterest and Roblox voluntarily signed up to adopt Ofcom’s BPP, which have been developed in collaboration with expert representatives from industry, civil society and the academic community.

⁷ Section 11(3) of the Act defines “regulated service” as (a) a regulated user-to-user service or (b) a regulated search service, as defined in section 4 of the [Online Safety Act 2023](#).

- 2.7 As outlined above, while section 11(1D) focuses specifically on regulated user-to-user and search services, section 11(1) relates to electronic media more broadly. The proposed recommendations in this document extend beyond user-to-user and search services regulated under the OSA and are directed at a wider range of online platforms as well as broadcasting and streaming services who create, host and distribute content and media.
- 2.8 Section 11(1E) requires us to publish a statement of recommendations and any revised versions in a manner that ensures that those likely to be affected are made aware of it. In line with this duty, we committed to publishing our first proposed recommendations for consultation in September 2025. This consultation not only seeks feedback on the proposed recommendations but also serves as a mechanism to bring it to the attention of relevant stakeholders.

Links between media literacy and online safety

- 2.9 Ofcom became the UK's online safety regulator following the OSA becoming law, and this document contributes to delivering our online safety priorities. In our updated [Online Safety Roadmap](#) published in October 2024, we identified eight strategic priorities to guide our initial efforts. Priority 7 is to 'give people more control over their online experience'. This document delivers on this priority, as will the upcoming consultation on proposed measures in the Codes of Practice relating to the user empowerment duties on Category 1 services, scheduled for 2026.⁸
- 2.10 As mentioned above, Ofcom defines media literacy as "the ability to use, understand and create media and communications across multiple formats and services".
- 2.11 Media literacy and online safety are closely connected. Media literacy equips individuals with the critical thinking skills and digital confidence needed to navigate online spaces responsibly and securely. By understanding how content is created, shared and consumed, people are better able to identify misinformation, avoid harmful content, protect their personal data and make informed choices about what they engage with and share online. In this way, media literacy supports safer online experiences; but it also goes further, helping people get the most out of their lives online.
- 2.12 We recognise the complementary but distinct roles of our media literacy duties and the online safety regime. While online safety focuses on protecting individuals from harm on regulated platforms, media literacy aims to empower people with the skills required to critically assess and engage with content. These two areas are mutually reinforcing. As such, some of the proposed recommendations in this document may overlap with or complement existing measures under the online safety regime.⁹
- 2.13 It is important to distinguish between the non-mandatory recommendations in this document and the mandatory requirements set out in the OSA, which are further explained in Ofcom's Codes of Practice and guidance. The OSA places legal obligations on regulated services and providers of regulated services that fail to meet their legal obligations under the OSA may face enforcement action. It is also important to note that these proposed

⁸ [Section 15](#) of the Act sets out the duties to empower adult users in relation to Category 1 services, with a focus on giving adult users of these services more control over the content that they encounter.

⁹ Further information about codes and guidance can be found on <https://www.ofcom.org.uk/online-safety>.

recommendations are aimed at a broader range of service providers beyond those regulated under the OSA (see Chapter 3).

- 2.14 This document should not be interpreted as a statement of Ofcom’s policy on other guidance or Codes of Practice under the OSA, nor should it be seen as pre-empting any future policy development. While there are close links between media literacy, broadcast regulation and online safety, these are distinct policy areas.
- 2.15 We also recognise the complementary but distinct roles of media literacy and the data protection regime. While data protection focuses on safeguarding individual’s personal data and ensuring lawful, fair and transparent processing by service providers, media literacy aims to empower individuals with the knowledge and skills to understand how their data can shape their online experiences. As such, some of the proposed recommendations in this document may also intersect or overlap with existing obligations under the data protection regime where service providers process personal data. It is important to distinguish between the non-mandatory status of the proposed recommendations and the mandatory requirements set out in UK data protection legislation. We expect service providers to comply fully with data protection legislation, including the UK GDPR, and to have regard to relevant guidance from the Information Commissioner’s Office (ICO).¹⁰

Links between media literacy and broadcasting

- 2.16 As people have migrated more of their viewing and listening online, broadcasters are increasingly distributing their content on their own video-on-demand (VoD) platforms, and via third party online platforms such as video-sharing platforms (VSPs), to reach wider audiences.
- 2.17 Broadcasting and streaming services can play a bigger role in reaching people and supporting media literacy. They can help ensure that people are equipped to access, use and understand not only their own apps and VoD platforms, but also the online platforms where they host or share their content. They also play an important role in helping people to think critically about content they encounter, whether on their own platforms or elsewhere.
- 2.18 PSBs in particular play a crucial role online, not only as trusted sources of news and information, but also as key contributors to public discourse and media literacy. Through topical programming, news and educational initiatives and content, they directly support people’s media literacy. Their ability to reach wide and diverse audiences, with whom they already have trusted relationships, makes them a vital channel for advancing media literacy at scale. We welcome and value this contribution.
- 2.19 The UK broadcasting sector is undergoing significant change. We have set out our views on these changes and priorities through the [PSMR](#), where we encouraged PSBs to invest in and contribute to media literacy in the UK. We highlighted their distinctive and trusted relationship with audiences as a valuable asset in helping people build confidence in using digital services, navigating online content, and protecting themselves from misinformation and disinformation.

¹⁰ Further information about codes and guidance can be found on www.ico.org.uk.

- 2.20 PSBs however face fierce competition from other services, particularly when it comes to engaging younger audiences. In an increasingly complex digital landscape, audiences' ability to find and access PSBs makes media literacy essential to their long-term success. PSBs' continued investment in media literacy is therefore more important than ever. As part of this evolving landscape, the Government is expected to begin the BBC Charter Review process later this year, and we will engage with them on how the BBC can continue to play a vital role in promoting media literacy.¹¹

What this document covers

- 2.21 The rest of this document consists of the following:
- a) Chapter 3 sets out the proposed services targeted by the proposed recommendations.
 - b) Chapter 4 sets out the proposed recommendations.
 - c) Chapter 5 sets out our impact assessments.
 - d) The Annexes explain how you can respond to this consultation.
- 2.22 As explained above, we are inviting stakeholders' views on the proposals set out in Chapters 3 to 5 by 8 December 2025. After considering the responses, we will publish our final recommendations by the end of this financial year.
- 2.23 As legislation and technology continue to evolve, we will revisit and refine the final statement of recommendation to ensure they remain relevant and effective.

¹¹ Within the broadcasting ecosystem, the BBC has a unique role. Audiences associate the BBC with having a trusted voice in the UK media landscape and its online services are a portal for many into how many UK audiences understand the world.

3. Targeted services

- 3.1 The proposed recommendations are aimed at a broad range of entities that enable the creation, hosting, and distribution of content and media that reach significant UK audiences through broadcast, on-demand and online platforms, including social media and streaming services.
- 3.2 Example of such services include:
- a) User-to-user services like social media, VSPs, forums, messaging apps and online games, and search services;
 - b) Broadcasting and streaming services such as the PSBs, including their VoD services, non-PSBs, VoD, including subscription video on demand (SVoD) and ad-supported video on demand (AVoD), free, ad-supported streaming television (FAST) channels, and streaming/online services, including online TV, radio and audio platforms;
 - c) Generative AI services, such as chatbots, AI character apps, and audio, image, and video generators, as well as other kinds of generative AI content creation services. These services are reshaping the digital landscape by automating content creation, personalising distribution and enabling more interactive and immersive experiences. These services are well-placed to embed media literacy practices early as the technology continues to develop; and
 - d) Other content-focused services that aggregate, distribute and publish content¹² across a mix of websites, apps, TV, and online platforms to reach audiences. Examples include online intermediaries or online TV platforms. Ongoing shifts in viewing habits and business models towards these and other emerging services, along with those anticipated in the coming years, highlight the growing need for consistent media literacy support, regardless of where or how people access media.

Question 1: Is it clear which types of organisations the 10 proposed recommendations are aimed at? Please provide reasons and evidence to support your answer.

Question 2: Do you have any comments on whether they should apply to all organisations, including those of different sizes and operating models? Please provide reasons and evidence to support your answer.

¹² Content refers to any form of information, expression, or creative material that is produced and shared for consumption, communication or engagement.

4. Our recommendations

Introduction

- 4.1 Our proposed recommendations have been grouped into four distinct categories, designed to broadly map on to typical user journeys through digital environments:
- a) **Design:** Recommendations focused on how service providers can design their services to offer people informed choice and meaningful control from the outset.
 - b) **During Use:** Recommendations aimed at empowering people while they are actively engaging with content and features.
 - c) **Beyond the service:** Recommendations that encourage service providers to contribute to media literacy more broadly, including through partnerships and outreach.
 - d) **Evaluating what works:** Recommendations that promote the assessment of media literacy initiatives and the continuous improvement of people's experiences through each of the three steps above (i.e. via design, during use, and beyond the service).
- 4.2 For each of the 10 proposed recommendations, we explain the purpose of the recommendation and set out the supporting evidence base. Each proposed recommendation is linked to a specific issue it seeks to address, with an explanation of why further action from service providers is warranted in that area. We also present the evidence base that underpins both the challenges identified and the examples of good practice we encourage providers to adopt.
- 4.3 The sections below expand on these proposed recommendations.

Design

- 4.4 The proposed recommendations in this section are focused on how service providers can design their services to offer people informed choice and meaningful control from the outset. We are making recommendations to services generally as we explained in Chapter 3, but there are two cases where we are proposing only recommending actions to specific stakeholders. For example, proposed recommendations 1-5, and 8-10 are for all service providers, proposed recommendation 6 is for online platforms and proposed recommendation 7 is for broadcasters and VoD services.
- 4.5 As mentioned above, our BPP sets out what constitutes best practice for the promotion of media literacy on platforms, particularly in relation to how services are designed. The BPP apply across a range of service types including search, social media, gaming and video-sharing services.
- 4.6 We recognise that some online platforms have already pledged to adopt the BPP and are actively implementing media literacy by design on their services. We also acknowledge that several broadcasters and streaming services demonstrate good practice in this area through their VoD platforms, which could serve as a valuable reference for other service providers such as online platforms, other broadcasters and VoD services, and new entrants.
- 4.7 We encourage all online platforms to continue pledging their commitment to these principles as a way of showing leadership and supporting media literacy across the UK. In

particular, we recommend that providers of Generative AI services adopt these recommendations early, as they are well-positioned to embed media literacy practices from the outset, especially as these technologies evolve and gain wider public adoption.

Recommendation 1: Embed media literacy by design, making inclusive design choices a foundational principle in service architecture and policy

- 4.8 The way that services are designed plays a critical role in shaping user behaviour and building long-term trust. When people understand how a service operates, especially how their data is used and what choices they are making, they are better able to engage meaningfully and responsibly. Inclusive design choices are central to media literacy by design because they ensure those with diverse needs can access services and be empowered to engage with them. This includes children, people with disabilities and those with lower digital confidence
- 4.9 For example, the case for media literacy by design becomes even more critical when children are likely to use a service. Children interact with services differently from adults and often lack the cognitive maturity (nor should be expected) to navigate complex privacy settings or persuasive design features.¹³ Our research shows that many services do not differentiate between child and adult accounts at sign-up, missing critical opportunities to implement age-appropriate safety and privacy protections.¹⁴
- 4.10 **We therefore recommend that service providers adopt and publish a ‘media literacy by design’ policy and practice.** This should be a living document that evolves in response to user needs and technological change. **We also recommend that, where children are likely to use the service, service providers prioritise age-appropriate design that emphasises simplicity, safety, and clarity in both content and data practices.**¹⁵ This includes default privacy settings, simplified language, and clear explanations of features tailored to younger audiences.¹⁶ Service providers must also consider their obligations under other relevant legislation (please refer to paragraph 2.11 to 2.15 for additional context).

¹³ 5Rights Foundation sets out a taxonomy of the most commonly used design strategies to influence behaviour on products and services popular among children. Source: 5Rights, 2023, [Disrupted Childhood: The cost of persuasive design.](#); 5Rights Foundation, 2023, [Digital Childhood: Addressing childhood development milestones in the digital environment.](#) See more information on child behavioural stages in the Recommended age groups section (Section 7.15).

¹⁴ Ofcom, 2025, [Behavioural Audit of Online Services.](#)

¹⁵ The [ICO’s children’s code](#) sets out how online services that are likely to be accessed by children should protect children’s privacy and personal data online.

¹⁶ For example: Ofcom, 2025, [Protecting children from harms online, Volume 4: What should services do to mitigate the risks of online harms to children.](#) p.481. 5Rights Foundation, 2021, [Tick to agree: Age appropriate presentation of published terms.](#); Designing for Children’s Rights, 2022, [Design Principles: Version 2.0.](#); Information Commissioner’s Office (ICO), 2020, [Age appropriate design: a code of practice for online services.](#); IEEE, 2021, [IEEE standard for an age appropriate digital services framework based on the 5Rights principles for children.](#); Save the Children, 2022, [How to write a child friendly document.](#)

Recommendation 2: Offer clear, meaningful choices and transparent information at key points in the service experience

- 4.11 There is a growing body of evidence demonstrating that the way online platforms design their services and present choices to people shapes how they respond.¹⁷ Literature demonstrates that behaviour is particularly open to change at key moments in the user journey, such as at sign up.¹⁸ In order for people to be able to take control of their online experiences and the content they consume, they need to be provided with clear information about the content on services at those key moments.
- 4.12 Our research has shown that many online platforms encourage people to accept default settings during sign-up, often without clearly explaining the implications.¹⁹ This can lead to confusion, as people may unknowingly agree to settings that affect their privacy, data sharing, or content visibility, without fully understanding the consequences.²⁰ In some cases, these default choices may prioritise platform interests over people's choices and control, making it harder for individuals to make informed decisions about how their information is used or how content is curated for them. Our research also highlights that people tend to stick with their initial choices at sign up to a service, making this a vital moment to promote empowered choice.²¹
- 4.13 It is well established that many services already use recommender systems. Recommender systems are technologies that curate and personalise the content served on services. However, it remains unclear how well people who use these services understand how these systems operate, or whether they feel they have meaningful choices or access to transparent information about them.
- 4.14 This lack of clarity can lead to people feeling disempowered or manipulated, particularly if they are unaware of how their data is being used to shape their online experience. It can also contribute to the spread of misinformation, reinforce filter bubbles²² or limit exposure to diverse perspectives. Without clear explanations, people are less able to critically engage with the content they see, which undermines media literacy and informed decision-making.
- 4.15 **We therefore recommend that service providers clearly inform people, at key moments in the user journey, such as during sign-up or profile creation, about the types of content available on the service (including any potentially sensitive material), as well as the use of recommender systems.** This should include clear explanations of what these systems do to help them understand their choices and support informed decision-making. This could be done through, for example, their terms of service, by providing clear onboarding information, through consent and transparency, prompts/reminders or accessible help and

¹⁷ CMA, 2022, [Online Choice Architecture: How digital design can harm competition and consumers](#).

¹⁸ BIT, 2014, [EAST Framework: Four simple ways to apply behavioural insights](#).

¹⁹ Ofcom, 2025, [Behavioural Audit of Online Services](#).

²⁰ CMA, 2022, [Online Choice Architecture: How digital design can harm competition and consumers](#). This report provides evidence that defaults are one of the most powerful tools in online choice architecture, with a 27% increased likelihood of selection when an option is pre-set.

²¹ Ofcom, 2024, [Behavioural insights to empower social media users](#).

²² A filter bubble is a personalised digital environment created by algorithmic content curation, where users are predominantly exposed to information that aligns with their previous online behaviour, potentially limiting exposure to diverse viewpoints.

settings sections of the service. Service providers must also consider their obligations under other relevant legislation (please refer to paragraph 2.11 to 2.15 for additional context).

- 4.16 People are better able to take control of their online experiences when they understand how recommender systems respond to their behaviours and preferences. However, our research shows that online platform design can sometimes hinder media literacy, particularly when there is a lack of transparency around how results are ranked or how recommender systems operate.²³ While the recommender system each service uses may vary, it's helpful for service providers to aid people in understanding what their specific systems do and how they can influence what they see. This includes providing clear, accessible explanations and highlighting the options people have available to influence and curate their personalised content.
- 4.17 **We therefore recommend that service providers help users better understand why they are seeing certain content in their feeds, such as by explaining what recommender systems do and how people can influence them.**

During Use

- 4.18 The proposed recommendations in this section are aimed at empowering people during their active engagement with content and features. Our aim is to ensure that people are equipped with the knowledge, skills, tools, confidence and support they need to manage their content and media consumption, as well as online interactions effectively, regardless of the service they use.
- 4.19 We recommend that:
- a) People are equipped with practical tools to manage and personalise their online experiences;
 - b) People are empowered with the knowledge, skills and confidence to understand, interpret and critically assess the credibility of the content they encounter;
 - c) Parents and caregivers are empowered and supported to guide and protect younger users in age-appropriate and meaningful ways and;
 - d) Expert third parties are empowered, engaged and enabled to provide enhanced support, helping to extend the reach and impact of media literacy efforts.
- 4.20 These proposed recommendations are primarily directed at online platforms and broadcasters with VoD platforms. We recognise that PSBs and some VoD service providers have demonstrated good practice in areas such as parental support and screen time restriction.

Recommendation 3: Equip people with practical tools to manage and personalise their online experiences

- 4.21 Content management tools are one category of resources available to help people shape their experiences on services. Other tools include screen time prompts, features that flag the tone of comments or question the accuracy of information, and emerging technologies that indicate when content has been generated by AI. Collectively, these tools can play a meaningful role in enhancing media literacy and supporting more informed engagement.

²³ Ofcom, 2023, [Report: Exploring high media literacy among adults and children](#)

- 4.22 Engaging with content plays a valuable role in people's lives, but many services are designed to maximise engagement, often keeping people online longer than they intend. Time on streaming devices doubled during the pandemic and Ofcom research shows that social media use among 3- to 5-year-olds has seen a significant increase – driven by a variety of platforms – up from 29% last year to 37%.^{24 25} While time spent online can bring many benefits and is a nuanced issue, features such as autoplay, infinite scroll, and personalised content feeds can lead people to spend more time online than they desire, which can leave people, and in particular children, feeling disempowered when using platforms.
- 4.23 As previously mentioned, behavioural research by Ofcom has found that default settings can be "sticky," meaning that even when prompted, few people move away from the default content control settings.²⁶ For children, this stickiness can be beneficial, helping to keep them within safer, higher-privacy settings. However, research into children with high media literacy also shows that some, particularly in gaming contexts, struggle to locate and adjust account settings.²⁷ This can prevent people, especially children, from effectively managing their online experiences.
- 4.24 **As people are unlikely to organically adjust their settings, we therefore recommend that service providers provide simple, accessible tools for people to be equipped to manage their experiences during use.** To support safe and informed choices, service providers should ensure it is easy to turn defaults off – but also to turn them back on again – and should prompt or remind users – especially children – of the option to re-enable protective defaults. Online platforms should make it easy for people to find and adjust these settings by providing clear, straightforward steps that minimise friction and avoid complex or hidden tools. **We recommend that time-management tools are made more visible and accessible so people can manage their time in ways that suit their needs.** Examples of how service providers could improve visibility and accessibility of time management tools include by enabling them by default, prompting users at key moments, simplifying their use and providing clear, accessible guidance.

Recommendation 4: Empower people with the knowledge, skills and confidence to understand, interpret and critically assess the credibility of the content they encounter

- 4.25 While many tools already exist to help people manage their online experiences, uptake of these remains low.²⁸ Without the relevant knowledge, skills and confidence, people will not be empowered to use them and these tools risk increasing redundancy.
- 4.26 Ofcom's behavioural audit systematically assessed how design features across six popular services, including one VSP, influenced user behaviour, focusing on sign-up processes, time management tools, sentiment controls, and reporting mechanisms. It found that the majority of online platforms audited offer tools to manage the content users see in their

²⁴ Ofcom, 2020, [Lockdown leads to surge in TV screen time and streaming](#).

²⁵ Ofcom, 2025, [Top trends from our latest look at the UK's media lives](#).

²⁶ Ofcom, 2024, [Behavioural insights to empower social media users](#).

²⁷ Ofcom, 2024, [Exploring high media literacy among children aged 8-12](#)

²⁸ Ofcom, 2024, [Behavioural insights to empower social media users](#). The report shows that only 26% of people say they have ever used content controls offered by social media platforms.

feeds, such as hide, block, dislike, or mute, but these are often difficult to locate or unintuitive to use. Tools such as blocking and reporting are essential for user safety, but poor design can undermine their effectiveness. Stronger tools, like blocking or reporting, frequently require multiple steps, which can discourage use.²⁹ In addition, poorly designed or unclear systems, such as vague user sanction policies or confusing blocking options, can increase the risk of harm by leaving users uncertain about how to protect themselves.³⁰

- 4.27 **We therefore recommend that service providers actively support users in deploying the tools they have developed, with the necessary skill and confidence.** This includes not only making tools more intuitive and accessible but also raising awareness of their existence and providing clear guidance on how to use them effectively. Service providers can do this by reducing the steps to access tools and by using simple language and visual prompts to build user confidence.
- 4.28 Looking ahead, the mainstream adoption of AI and the growing presence of AI-generated content will make it even harder for people to understand and control what they see online. As Ofcom's discussion paper on deepfakes highlights, technologies like watermarking and metadata can help users identify and interpret synthetic media more accurately.³¹ **We therefore recommend that service providers provide meaningful context about content and its sources, using tools such as watermarking, metadata, and AI labels, to support informed interpretation and build trust.** Service providers should implement several of these tools, rather than relying on just one, and should continue to invest in research and standardisation to improve how context is provided. While we recognise that some service providers may have limited access to certain forms of context (e.g. metadata), they should nonetheless strive to offer meaningful information wherever possible to aid user understanding.
- 4.29 Ultimately, it is vital that service providers support people in developing the critical thinking skills needed to navigate today's complex digital landscape. How they empower their users and audiences will be a matter for them and will necessarily include a combination of design, tools, placement and investment in skills development. When done well, this not only empowers individuals but also contributes to a more resilient, informed, and safer digital environment.³²

Recommendation 5. Empower and support parents and caregivers to guide and support younger users in age-appropriate and meaningful ways

- 4.30 Online services play a key role in helping to keep children safe online. However, in this context parents and caregivers can also be vital in helping children and young people to learn how to navigate and manage their use of services. All families are different and will approach their experiences on services in diverse ways, with family tools helping them to manage these experiences. While many are concerned about screen time and online behaviours, research consistently shows that they often feel underprepared or

²⁹ Ofcom, 2025, [Behavioural Audit of Online Services](#).

³⁰ Thorn, 2021, [Responding to online threats: minors' perspectives on disclosing, reporting and blocking](#).

³¹ Ofcom, 2024, [Deepfake Defences: Mitigating the Harms of Deceptive Deepfakes](#)

³² Ofcom, 2025, [Why all of us need to talk about mis and dis information](#).

unsupported in managing these challenges,³³ despite having a high awareness of the availability of tools.

- 4.31 Our research shows that 93% of parents are aware of tools to support children online, yet only 76% of parents of 3–17-year-olds use at least one. This gap highlights that awareness alone is not enough. Factors such as design, usability and online confidence significantly influence uptake. Our research also shows that built-in parental controls, such as those embedded on devices, are the most commonly used, suggesting that ease of access and seamless integration are key.³⁴ Tools that are difficult to find, configure, or understand may discourage use, even among well-intentioned parents.
- 4.32 Our research tracking also reveals a reactive pattern: the number of parents setting up filters or controls increases after a child encounters harmful content (from 23% to 34%).³⁵ This suggests that proactive education and design nudges – targeted at parents and caregivers – could encourage earlier adoption, which may help to prevent these from occurring in the first instance.
- 4.33 **We therefore recommend that service providers set strong privacy and safety defaults for child accounts or profiles creation and clearly present parental controls at sign-up and other opportune moments, helping families make informed, safe choices from the outset.**³⁶ Service providers should ensure that these tools are effective and that parents understand what they can be used for.
- 4.34 Children are also increasingly exposed to the commercial features of the services they use. For example, in-app or in-game purchases can enhance their online experience, which is something many children value and actively seek out. However, without appropriate knowledge and support, children may be vulnerable to financial harms, even in situations where parents or caregivers are comfortable with them accessing paid-for features. This is understandable, as children often lack the financial literacy or life experience to fully grasp the consequences of their spending decisions, nor should they be expected to.
- 4.35 Our research has shown that, some children, especially older teenagers, acknowledged that the excitement lies more in the thrill of the purchase than in the product itself. Parents and some of the oldest children expressed concern that this behaviour could become a gateway to gambling, as young people chase the "purchase high," which encourages continued engagement and spending. The cycle of buying and seeking the next thrill creates an environment where impulsive behaviour and risk-taking are reinforced.³⁷
- 4.36 Service providers have a role in helping children and young people to develop their understanding surrounding online monetisation, and how this shapes the digital environment. This will help them develop into more informed and empowered users of technology. **We therefore recommend that service providers ensure transparency around commercial features and costs, with real-time notifications and easy-to-use settings that keep parents and caregivers informed and in control.**

³³ Pew Research Centre, 2020, [Parenting Kids in the Age of Screens, Social Media and Digital Devices](#).

³⁴ Ofcom, 2025, [Children and parents: Media Use and Attitudes Report – interactive data](#).

³⁵ Ofcom, 2025, [Children and Parents: Media Use and Attitudes Report](#)

³⁶ Report by The Insights Family produced for the ICO, 2022, [Understanding Data Protection Attitudes](#). The research found that over 40% of parents/carers ranked “provide a high level of privacy by default” as one of the most important actions platforms should take to safeguard children’s data.

³⁷ Discovery, 2025, [Persuasive design features and potential child financial harms – qualitative research](#).

- 4.37 The tools we have been discussing are particularly relevant for parents and caregivers with younger children. However, as children grow older their digital habits evolve, and while these tools can still play an important role, there is also a growing need for open and ongoing conversations about online life. These discussions can be challenging, as many parents and caregivers feel underprepared. The diversity of parental controls and recommender systems across platforms adds complexity – what works well on one service may not translate to another – requiring a high level of digital literacy and confidence that not all families may possess.
- 4.38 **We therefore recommend that service providers engage with and support, through funding and collaboration, expert third parties that can provide tailored guidance to parents and caregivers, both in person and online.** We expand on this recommendation below.

Recommendation 6. Empower, engage and enable expert third parties to provide enhanced support, helping to extend the reach and impact of media literacy efforts

- 4.39 Expert third parties play a critical role in supporting the media literacy of the population. These could include, but are not limited to: user advocacy groups like AgeUK, VoiceBox and Mencap; digital inclusion organisations such as The Good Things Foundation and Nominet; family focused not-for-profits like Internet Matters or ParentZone; those focused on information integrity like Full Fact; grassroots initiatives like Red Chair Highland, ConnectFutures and Mhor Collective; those offering support to educators and professionals like South West Grid for Learning (SWGfL) and those offering educational programmes like Loudmouth and The Guardian Foundation.
- 4.40 These organisations bring a range of strengths and expertise to media literacy: some have deep, on-the-ground knowledge of user needs and community vulnerabilities and are trusted by their audiences, while others offer expertise in specific aspects of media literacy, such as educational or professional support. Some are uniquely positioned as expert voices in online safety or health, parenting young adults and some provide in-person services that build confidence and engagement.³⁸ Their diverse capabilities make them essential partners in reaching and supporting a wide range of audiences.
- 4.41 Online platforms have a powerful role to play in connecting people with the information they need, especially during emergencies or meaningful moments in the user journey. For example, platforms can guide users toward expert third party resources and authoritative content in ways that make sense for their users. This could include integrating context-aware triggers and time-sensitive interventions, such as when users search for or report harmful content, as well as using onboarding flows or help centre materials. Our experience shows that partnerships with organisations that already have expert relationships with target groups are key to effective engagement and response.³⁹ This approach not only supports immediate information needs but also strengthens users' media literacy by helping them identify credible sources and navigate complex situations with confidence.

³⁸ For example, authoritative sources like NHS or WHO which were both used in the pandemic.

³⁹ Ofcom, 2024, [Listening to experts: mental health and media literacy](#).

- 4.42 **We therefore recommend that online platforms explore ways to share timely links to expert third party sources and authoritative content during meaningful moments.** This helps people access reliable support and respond confidently.

Beyond the service

- 4.43 The proposed recommendations in this section are focused on encouraging services to contribute to media literacy more broadly, including through partnerships and outreach beyond their own service.

Recommendation 7. Help people understand, interpret and assess the credibility of information by creating and/or promoting relevant programming or educational content

- 4.44 Broadcasting and streaming services have the ability to reach large audiences through a range of interventions, including educational initiatives, online resources, and programming that supports critical engagement with content. With their wide reach, they are well-placed to support parents, caregivers, and third-party organisations in promoting media literacy. This is particularly the case for PSBs due to their trusted relationships with their audiences.
- 4.45 In section 6 of the [PSMR](#), we emphasised PSBs need to invest in media literacy in the UK and called on them to build on existing work.⁴⁰ We highlighted their distinctive and trusted relationship with audiences as a key asset in helping people build confidence in navigating digital environments. We also noted that PSBs and large commercial broadcasters could have a role to play in supporting users to understand how to use tools to curate their content feeds.⁴¹ We highlighted examples of media literacy activity from PSBs and Sky. This included educational initiatives such as workshops for young people, online resources like quizzes and interactive content, and the integration of topical themes into a wide range of programming, from magazine shows to dramas and soap operas.⁴² We said given its remit to support learning for people of all ages the BBC also has a particular responsibility. We suggested that there may be opportunities for PSBs to collaborate more closely to scale up delivery and impact in relation to media literacy.⁴³
- 4.46 Therefore, **we recommend broadcasting and streaming services create and/or promote programming or educational content that helps people to understand, interpret and assess the credibility of information** on online platforms and digital environments. These would in turn support parents and caregivers in making informed decisions about their child's online experience.

⁴⁰ Ofcom, 2025, [Transmission Critical: The future of Public Service Media](#). p.57.

⁴¹ Ofcom, 2025, [Transmission Critical: The future of Public Service Media](#). p.62.

⁴² Ofcom, 2025, [Transmission Critical: The future of Public Service Media](#). pp.60-61

⁴³ Ofcom, 2025, [Transmission Critical: The future of Public Service Media](#). p.61.

Recommendation 8. Promote media literacy beyond services, investing in campaigns, content, and partnerships that promote media literacy skills

- 4.47 Developing media literacy skills is not innate – it requires time, support and therefore investment. A media literate population is more likely to engage in civic activities⁴⁴, and is more likely to have the skills required to contribute to growth in the online economy.
- 4.48 From our own conversations and work that we have commissioned from the Charities Aid Foundation, we know that funding of community-based media literacy skills development programmes is hard to find, short-term and often led by brand desires rather than meeting community needs.
- 4.49 By supporting media literacy programmes, online platforms can engage with communities through those who have trusted relationships, often where change can most effectively be achieved. Whilst this is not without its difficulties, it represents a meaningful change towards proactive responsibility. We encourage online platforms to build strategic partnerships with charities, educators⁴⁵, and other bodies to help share the responsibilities and amplify the impact of online platforms and others’ effort.
- 4.50 The House of Lords Media Literacy Inquiry highlighted the role of technology companies in advancing media literacy across the UK, recommending that they invest in the development of people’s media literacy skills.⁴⁶ This aligns with one of the goals of our three-year strategy to encourage online services to actively promote, support, and fund media literacy initiatives. We expect this recommendation to be adopted in a proportionate way to the scale and reach of each service provider. To that end, **we recommend that service providers actively support media literacy skills development by committing to long term funding of skills-building programmes.** A lot of our learning about ‘what works’ in media literacy skills development suggests this is best delivered by organisations with trusted relationships with their communities. This work is most often local, specific, targeted and impactful.⁴⁷

Recommendation 9. Support the media literacy of underserved and diverse audiences

- 4.51 Media literacy must be inclusive. It should not only focus on those who are already able to engage with service providers, but also seek to reach those who, for various reasons, are currently unable to participate in media literacy initiatives. This inclusivity should be embedded from the design stage, through user engagement, and into broader societal outreach.
- 4.52 At the design stage, supporting the media literacy of under-served and diverse audiences means recognising that every design decision can affect users differently. Online platforms, broadcasting and streaming services should therefore aim to meet a wide range of needs by

⁴⁴ Park, 2023, [Exploring the relationship between media literacy, online interaction, and civic engagement](#).

⁴⁵ Ofcom, 2025, [A teachable moment: opportunities, gaps and next steps from our review of Media literacy training for teachers](#).

⁴⁶ House of Lords Communications and Digital Committee, 2025, [3rd Report of Session 2024-25, Media Literacy](#). p.37, paragraph 113.

⁴⁷ Ofcom, 2024, [What works in delivering media literacy activities](#)

involving diverse users in the research and development process, ensuring that services are both accessible and relevant. Ensuring accessibility for users with disabilities, including those who rely on screen-reading technology, should be a key consideration.⁴⁸

- 4.53 Service providers should also consider how to support the media literacy of diverse audiences when they are using their services. This means recognising that factors such as age, online skills, confidence, and accessibility needs all influence how information is received and understood, and that different user groups may be affected differently by certain types of content.⁴⁹
- 4.54 **We therefore recommend that service providers adopt inclusive design practices that address a broad spectrum of media literacy needs, especially for those most at risk.** This includes using plain language, visual cues, and conducting user testing with under-represented groups to ensure that information is clear, accessible, and meaningful.
- 4.55 Beyond the core offering, service providers must consider how underserved or marginalised communities might need support to access and engage meaningfully. Barriers to access can arise from factors such as socioeconomic status, age⁵⁰, sex, disability, and other intersecting characteristics.⁵¹ Our experience is that media literacy initiatives that are informed by people's lived experiences, cultures, and contexts are more likely to be effective and inclusive. We recognise that this work can be complex and resource-intensive and that some traditional broadcasters and community radio services already carry out work to reach underserved and marginalised communities. We encourage them to continue with these initiatives and report on them.
- 4.56 **We also recommend that online platforms form partnerships with third sector organisations, government bodies, Ofcom, and grassroots community groups, particularly those with strong connections to underserved communities, to co-design and deliver impactful media literacy interventions.**

Evaluating and reporting

- 4.57 The proposed recommendations in this section are focused on promoting the assessment of media literacy initiatives and the continuous improvement of people's experiences through each of the three steps above (i.e. via design, during use and beyond the service).

Recommendation 10. Conduct and publish evaluations of the impacts of their choices and activities

- 4.58 Evaluation plays an important role in understanding the impact that design choices and interventions have on people's knowledge, skills, and behaviours. To support organisations

⁴⁸ Ofcom research found that 18% of internet users aged 16-24 reported having had difficulty reading information online because the content was difficult to navigate using a keyboard. The same proportion reported the same difficulty because the content was not compatible, or was difficult to use, with a screen reader or screen-reading technology. Source: Ofcom, 2023, Platform Terms and Accessibility (Q6)

⁴⁹ Evidence suggests that neurodiverse children may be more likely to be adversely affected by content depicting violence. Ofcom, 2024, [Understanding pathways to online violent content among children](#).

⁵⁰ Ofcom, 2024, [Exploring high media literacy among children aged 8-12](#) and [Exploring high media literacy among adults and children](#).

⁵¹ Ofcom, 2024, [Boosting skills among children, older adults and Disabled people: Evaluating what works for media literacy](#).

in conducting robust assessments, we have published an [Outcomes Bank](#) and an [Evaluation Toolkit](#). These resources are designed to help organisations measure the effectiveness of their media literacy efforts and understand how they are contributing to improving media literacy.

- 4.59 It is vital that service providers evaluate the impact of their media literacy activities. Evaluating design choices enables them to understand what works, what does not, and where improvements are needed.
- 4.60 Evaluation approaches should be relevant and proportionate. For example, while larger online platforms may be able to use advanced methods such as A/B testing or randomised control trials (RCTs), smaller service providers can focus on simpler methods to assess the benefits of interventions for their target audiences.
- 4.61 Reporting and sharing findings help build a clearer picture of the scale and nature of media literacy activity across the UK. We recognise that some service providers embed media literacy by design or deliver targeted interventions. However, these efforts are often part of broader initiatives and may not be reported as media literacy work. Capturing and reporting on these activities reduces duplication, sets benchmarks for others, and highlights existing commitments in terms of measures and resourcing. This, in turn, helps identify where further action is needed. If findings are published, they can also contribute to a wider body of knowledge on the impact of media literacy.
- 4.62 **We therefore recommend that service providers regularly assess the impact of their design choices and media literacy activities and publish their findings.**
- 4.63 **We also recommend that service providers publish an annual statement on their media literacy activities**, including:
- Media literacy by design choices that offer people meaningful choice and control from the outset.
 - Any programmatic content which supports the promotion of media literacy outcomes, as defined by Ofcom’s media literacy outcomes bank.
 - Delivery of scaled media literacy interventions to their target audiences including details of numbers of people reached and where they were delivered.
 - Collaboration and support for organisations who are trusted by underserved audiences.
- 4.64 By embracing the challenge of reporting on media literacy activities, the largest service providers can lead by example in this area, demonstrating these recommendations in use and helping to build a stronger evidence base for what works. As with all evaluation, approaches should be relevant and proportionate.

Question 3: Do you have any comments on the proposed recommendations? Please provide comments in particular on their effectiveness, applicability or risks. Please provide evidence to support your answer.

Question 4: Are there any other additional recommendations you think we should consider? If so, please provide evidence to support your comment.

Question 5: Do you have any examples or suggestions of ways of encouraging services to adopt these recommendations?

5. Impact assessments

Impacts on businesses and general public

- 5.1 Impact assessments provide a valuable way of assessing the options for regulation and showing why the chosen option(s) was preferred. They form part of best practice policy making. This is reflected in section 7 of the Communications Act 2003, which requires Ofcom to carry out and publish an assessment of the likely impact of implementing a proposal which would be likely to have a significant impact on businesses or the general public, or when there is a major change in Ofcom's activities.
- 5.2 As a matter of policy, Ofcom is committed to carrying out impact assessments in the large majority of our policy decisions and has discretion as to the substance and form of an impact assessment. Our impact assessment guidance sets out our general approach to how we assess and present the impact of our proposed decisions.⁵²
- 5.3 This impact assessment is conducted in line with best practices. Given the non-mandatory nature of the proposed recommendations, we do not anticipate a significant impact on businesses. Service providers who engage with the proposed recommendations may incur minor administrative costs, primarily from reviewing this brief document. Any impact on the general public may vary, depending on the extent to which service providers choose to adopt the proposed recommendations. Although this is the first time publishing the proposed recommendations that are required under the OSA, this does not represent a major shift in Ofcom's activities, as similar best practice guidance has been published previously. In addition, some of the proposed recommendations draw upon measures already set out in online safety regulation and data protection requirements, and service providers in scope of those requirements will already be expected to implement them, which means they would not impose any further impacts.
- 5.4 For those service providers that go further and implement these proposed recommendations when they are not already following these practices, in particular proposed recommendations 1-5, additional costs may arise depending on the extent of implementation, the size and complexity of the service and the maturity of existing infrastructure. For example:
- a) Service providers aligned with existing design standards are likely to experience minimal impact.
 - b) Service providers starting from a low baseline may face more substantial costs, including both one-off and ongoing investments. These costs could include staff time to review and redesign user journeys, deployment of new tools or updates to existing infrastructure and increased consultation efforts, both internal and external, leading to logistical and staffing expenses.
 - c) Similarly, new entrants may also incur more substantial costs if they have not yet embedded in their service design some proposed recommendations as part of their initial setup.

⁵² Ofcom, [Impact assessment guidance](#), 2023.

- 5.5 Some service providers may also need to adjust aspects of their business models, in particular for proposed recommendations 1-3, which could have longer-term financial implications. For instance, services reliant on advertising revenue may be affected if enhanced privacy settings or time-management tools reduce the exposure or impact of advertising. Similarly, greater transparency in recommender systems or increased user control may also impact profitability of services.
- 5.6 We also recommend that service providers collaborate with third parties for consultation, funding and outreach to underserved communities. The costs of such engagements, in particular with proposed recommendations 6, 8 and 9, will vary depending on their scope and nature. We expect larger players to take on a greater share of this responsibility, recognising that some of them are already aligning with these proposed recommendations, ensuring proportionality across the sector.
- 5.7 Importantly, implementation of these 10 proposed recommendations is non-mandatory, allowing services to adopt them in a proportionate way. Services retain flexibility over how much to invest and when. We expect that firms will weigh the potential costs against the anticipated media literacy benefits for people, and for themselves, and proceed where the benefits clearly outweigh the costs.
- 5.8 Despite potential costs, the proposed recommendations, in particular recommendations 4, 5 and 9, present opportunities for service providers. By adopting them, service providers can explore more sustainable and user-trusted revenue models, which may enhance user trust and strengthen brand reputation. New customers may be found by making services more welcoming to underserved user groups today and fostering their confidence online.

Rights assessment

- 5.9 As a public authority, Ofcom must act in accordance with its public law duties to act lawfully, rationally and fairly, and it is unlawful for Ofcom to act in a way which is incompatible with the European Convention on Human Rights (ECHR) as set out in the Human Rights Act 1998. Of particular relevance to Ofcom's functions are the right to freedom of expression (Article 10) and the right to privacy (Article 8). Any interference with these ECHR rights must be prescribed by law, necessary to achieve a legitimate aim, and be proportionate to that aim.
- 5.10 We have had particular regard to these rights when developing these proposed recommendations to ensure that the actions we recommend are appropriate and proportionate, and do not disproportionately infringe on these or other ECHR rights. The proposed recommendations are non-mandatory, allowing services to adopt them flexibly and proportionally, which further mitigates any potential interference.

Freedom of Expression

- 5.11 In developing these proposed recommendations, we have carefully considered the potential impact on freedom of expression under Article 10 of the ECHR. While the overall aim is to enhance people's ability to receive and impart information, we recognise that certain proposed recommendations have the potential, if misapplied, to introduce indirect or unintended constraints. For example:
- a) Proposed recommendation 3 and proposed recommendation 4 could influence how people perceive or engage with certain types of content particularly if automated

systems mislabel legitimate speech or if default settings reduce exposure to diverse viewpoints.

b) Proposed recommendation 5 and proposed recommendation 6 may affect access to content in unintended ways if not implemented with sufficient flexibility.

- 5.12 However, if implemented as intended we do not expect the proposed recommendations to represent a more than minimal risk of interference with rights to freedom of expression, including that of service providers. This is particularly the case in light of the non-mandatory nature of the proposed recommendations, the emphasis on giving people more control, and the expectation that service providers will adopt the proposed recommendations in a proportionate and rights-respecting manner.
- 5.13 Overall, the proposed recommendations are designed to promote freedom of expression by enhancing people's ability to receive and engage with information. For example, proposed recommendations 1, 2 and 4 can improve how people understand and consume content more confidently and engage critically with news, journalistic content, and material of democratic importance, and therefore we expect positive impacts for services that host such material. In addition, online abuse and harassment, particularly affecting marginalised groups, can limit people's ability to express themselves freely. These proposed recommendations aim to address that by encouraging service providers to provide people with tools to take control of their online experience.
- 5.14 In this context, we consider any potential interference to be justified and proportionate, in light of the significant benefits to people in the UK where the proposed recommendations are adopted, including in enabling them to participate more actively and in an informed way online.

Privacy

- 5.15 Article 8 of the ECHR sets out the right to respect an individual's private and family life. Some of the proposed recommendations may involve the collection and processing of personal data, such as proposed recommendations 1, 2 and 5. Other proposed recommendations such as 6, 7 and 8 do not envisage the collection or processing of personal data for their implementation.
- 5.16 We expect services to comply fully with data protection legislation, including the UK GDPR and relevant guidance from the Information Commissioner's Office (ICO). Additionally, any potential interference is mitigated by the non-mandatory nature of these proposed recommendations and the strong emphasis on privacy by design and default. For example, services are encouraged to use non identifiable usage patterns, contextual indicators, or aggregated behavioural signals to inform design decisions, rather than relying on direct personal data collection. Therefore, we consider any potential interference with privacy rights to be minimal where these proposed recommendations are adopted as intended.
- 5.17 In this context, we consider any potential interference to be justified and compatible with data protection requirements, particularly in light of the challenges posed by misinformation, online harm and digital exclusion.
- 5.18 Overall, we believe the proposed recommendations strike a fair and proportionate balance between our media literacy duties and the public interest they seek to secure, and protecting human rights.

Equality impact assessment

- 5.19 Section 149 of the Equality Act 2010 (the 2010 Act) imposes a duty on Ofcom, when carrying out its functions, to have due regard to the need to eliminate discrimination, harassment, victimisation and other prohibited conduct related to protected characteristics. It also requires Ofcom to advance equality of opportunity and foster good relations between persons who share specified protected characteristics and persons who do not.
- 5.20 Additionally, section 75 of the Northern Ireland Act 1998 (the 1998 Act) also imposes a duty on Ofcom, when carrying out its functions relating to Northern Ireland. Ofcom's Revised Northern Ireland Equality Scheme explains how we comply with our statutory duties under the 1998 Act.⁵³
- 5.21 When assessing equality impacts, we consider the impact of our proposals not only on people with protected characteristics under equalities legislation, but also on a broader range of demographic and social groups. Section 3(4) of the Act requires us to have regard to the needs and interests of specific groups. We examine the potential impact our policy is likely to have on people, depending on their personal circumstances. This also assists us in making sure that we are meeting our principal duty of furthering the interests of citizens and consumers, regardless of their background and identity.
- 5.22 We believe these proposed recommendations will deliver meaningful benefits to a wide range of people, including those with protected characteristics and those at risk of digital exclusion. By promoting inclusive design, improving accessibility and supporting media literacy, services can empower a broader range of people to take control of their online experiences. This approach not only makes services more equitable but also contributes to a healthier and more inclusive digital environment. Our proposed recommendations are designed to empower users, promote equality of opportunity, and foster positive interactions between people. Collectively, they aim to give individuals greater control over their online experiences.
- 5.23 We expect these proposed recommendations to have a particularly positive impact on people experiencing financial disadvantage, older adults, children, and people with learning disabilities and/or cognitive impairments. These groups are more likely to require media literacy support than the general population, as evidenced by our own, and wider, research.
- 5.24 By encouraging services to adopt user-centric design and engage with diverse groups, the proposed recommendations help reduce barriers to access and foster more equitable digital environments. This is particularly relevant to recommendation 1, 2 and 3. These recommendations promote effective use of tools like blocking and muting, which may help protect users from harassment based on race, religion, or other characteristics.
- 5.25 Children benefit from age-appropriate tools, while parents are supported in proposed recommendations 1, 3 and 5. Marginalised groups can be included through partnerships with expert third parties, educational programming and community-based campaigns (proposed recommendation 6, 7 and 8). And proposed recommendation 9 explicitly addresses the needs of underserved and intersectional audiences. If implemented, this proposed recommendation could reduce barriers for people with protected characteristics

by improving accessibility and fostering collaboration with marginalised communities. Evaluation mechanisms can help to identify disparity and improve outcomes (proposed recommendation 10).

- 5.26 While the overall impact is expected to be positive, we acknowledge potential risks. Poorly designed or excessive tools may create cognitive overload, particularly for younger users or those with disabilities. Similarly, if privacy settings, parental controls, or other features are implemented without sufficient expertise, user input, or testing, they may lead to user fatigue, reduce children's agency or strain parent-child relationships. To mitigate these risks, we have emphasised user-centric design, and encouraged services to engage with diverse user groups during development to ensure tools are intuitive and proportionate. We also acknowledge that educational content and third-party resources may not be accessible to all users if not designed inclusively. However, services are encouraged to use plain language, subtitling, audio description and culturally sensitive formats.
- 5.27 Finally, we recognise that no single method for improving online content credibility is without risk. Tools, such as watermarks or labels, used to indicate whether content is trustworthy or AI generated are intended to help users make informed decisions about information they encounter online. However, these tools could be misused by bad actors, for example to falsely legitimise misleading content.
- 5.28 Overall, we believe the benefits of these proposed recommendations outweigh the potential risks and offer a valuable opportunity to advance equality of opportunity, reduce digital exclusion and foster positive relations between people with and without protected characteristics.

Welsh language

- 5.29 The Welsh Language (Wales) Measure 2011 made the Welsh language an officially recognised language in Wales. Ofcom is required to take Welsh language considerations into account when formulating, reviewing or revising policies which are relevant to Wales (including proposals which are not targeted at Wales specifically but are of interest across the UK).
- 5.30 Where the Welsh Language Standards are engaged, we consider the potential impact of a policy proposal on (i) opportunities for persons to use the Welsh language; and (ii) treating the Welsh language no less favourably than the English language. We also consider how a proposal could be formulated so as to have, or increase, a positive impact, or not to have adverse effects or to decrease any adverse effects.
- 5.31 Ofcom's powers and duties in relation to media literacy set out in the Act must be exercised in accordance with our general duties under section 3 of the Communications Act 2003. In formulating our proposed recommendations, where relevant and to the extent we have discretion to do so in the exercise of our functions, we have considered the potential impacts on opportunities to use Welsh and treating Welsh no less favourably than English.
- 5.32 We have assessed the proposed recommendations and concluded either on a final or initial basis they are likely to have positive effects or increased positive effects on opportunities to use Welsh and treating Welsh no less favourably than English, with no known adverse effects.

- 5.33 We are recommending that services should have regard to the needs of the people in considering what languages are needed when supporting the media literacy of underserved and diverse audiences (proposed recommendation 9). To this extent, we consider our proposals are likely to have positive effects or increased positive effects on opportunities to use Welsh and treating Welsh no less favourably than English. We do not consider that any adverse effects are likely to arise as a result of our proposals.
- 5.34 Our proposed recommendations, as set out in this document, aim to deliver improved media literacy outcomes across the UK. In recognition of the potential interest from consumers and stakeholders in Wales, we are translating this consultation into Welsh.

Question 6: Do you have any comments on our impact assessment, rights assessment, equality impact assessment and Welsh language assessment? Please provide evidence in support your answer.

A1. Responding to this consultation

How to respond

- A1.1 Ofcom would like to receive views and comments on the issues raised in this document, by 5pm on Monday 8 December 2025.
- A1.2 You can download a response form from [here](#). You can return this by email or post to the address provided in the response form.
- A1.3 If your response is a large file, or has supporting charts, tables or other data, please email it to MSOM_SoR_Consultation@ofcom.org.uk, as an attachment in Microsoft Word format, together with the cover sheet. This email address is for this consultation only and will not be valid after Monday 8 December 2025.
- A1.4 Responses may alternatively be posted to the address below, marked with the title of the consultation:
- Making Sense of Media
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA
- A1.5 We welcome responses in formats other than print, for example an audio recording or a British Sign Language video. To respond in BSL:
- > send us a recording of you signing your response. This should be no longer than 5 minutes. Suitable file formats are DVDs, wmv or QuickTime files; or
 - > upload a video of you signing your response directly to YouTube (or another hosting site) and send us the link.
- A1.6 We will publish a transcript of any audio or video responses we receive (unless your response is confidential).
- A1.7 We do not need a paper copy of your response as well as an electronic version. We will acknowledge receipt of a response submitted to us by email.
- A1.8 You do not have to answer all the questions in the consultation if you do not have a view; a short response on just one point is fine. We also welcome joint responses.
- A1.9 It would be helpful if your response could include direct answers to the questions asked in the consultation document. The questions are listed at Annex 4. It would also help if you could explain why you hold your views, and what you think the effect of Ofcom's proposals would be.
- A1.10 If you want to discuss the issues and questions raised in this consultation, email MSOM_SoR_Consultation@ofcom.org.uk.

Confidentiality

- A1.11 Consultations are more effective if we publish the responses before the consultation period closes. This can help people and organisations with limited resources or familiarity with the issues to respond in a more informed way. So, in the interests of transparency and good regulatory practice, and because we believe it is important that everyone who is interested in an issue can see other respondents' views, we usually publish responses on the Ofcom website at regular intervals during and after the consultation period.
- A1.12 If you think your response should be kept confidential, please specify which part(s) this applies to and explain why. Please send any confidential sections as a separate annex. If you want your name, address, other contact details or job title to remain confidential, please provide them only in the cover sheet, so that we don't have to edit your response.
- A1.13 If someone asks us to keep part or all of a response confidential, we will treat this request seriously and try to respect it. But sometimes we will need to publish all responses, including those that are marked as confidential, in order to meet legal obligations.
- A1.14 To fulfil our pre-disclosure duty, we may share a copy of your response with the relevant government department before we publish it on our website.
- A1.15 Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Ofcom's intellectual property rights are explained further in our Terms of Use.

Next steps

- A1.16 Following this consultation period, Ofcom expect to publish a statement by the end of the financial year.
- A1.17 If you wish, you can register to receive mail updates alerting you to new Ofcom publications.

Ofcom's consultation processes

- A1.18 Ofcom aims to make responding to a consultation as easy as possible. For more information, please see our consultation principles in Annex 2.
- A1.19 If you have any comments or suggestions on how we manage our consultations, please email us at consult@ofcom.org.uk. We particularly welcome ideas on how Ofcom could more effectively seek the views of groups or individuals, such as small businesses and residential consumers, who are less likely to give their opinions through a formal consultation.
- A1.20 If you would like to discuss these issues, or Ofcom's consultation processes more generally, please contact the corporation secretary:

Corporation Secretary
Ofcom
Riverside House
2a Southwark Bridge Road
London SE1 9HA
Email: corporationsecretary@ofcom.org.uk

A2. Ofcom's consultation principles

Ofcom has seven principles that it follows for every public written consultation:

Before the consultation

1. Wherever possible, we will hold informal talks with people and organisations before announcing a big consultation, to find out whether we are thinking along the right lines. If we do not have enough time to do this, we will hold an open meeting to explain our proposals, shortly after announcing the consultation.

During the consultation

2. We will be clear about whom we are consulting, why, on what questions and for how long.
3. We will make the consultation document as short and simple as possible, with an overview of no more than two pages. We will try to make it as easy as possible for people to give us a written response.
4. When setting the length of the consultation period, we will consider the nature of our proposals and their potential impact. We will always make clear the closing date for responses.
5. A person within Ofcom will be in charge of making sure we follow our own guidelines and aim to reach the largest possible number of people and organisations who may be interested in the outcome of our decisions. Ofcom's Consultation Champion is the main person to contact if you have views on the way we run our consultations.
6. If we are not able to follow any of these principles, we will explain why.

After the consultation

7. We think it is important that everyone who is interested in an issue can see other people's views, so we usually publish the responses on our website at regular intervals during and after the consultation period. After the consultation we will make our decisions and publish a statement explaining what we are going to do, and why, showing how respondents' views helped to shape these decisions.

A3. Consultation coversheet

Basic details

Consultation title:

To (Ofcom contact):

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

Confidentiality

Please tick below what part of your response you consider is confidential, giving your reasons why

- | | |
|----------------------------------|--------------------------|
| > Nothing | ☐ |
| > Name/contact details/job title | ☐ |
| > Whole response | ☐ |
| > Organisation | ☐ |
| > Part of the response | ☐ |

If you selected 'Part of the response', please specify which parts:

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

Yes ☐ No ☐

Declaration

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom aims to publish responses at regular intervals during and after the consultation period. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Signed (if hard copy)

A4. Consultation questions

Please tell us how you came across about this consultation.

- ☐ Email from Ofcom
- ☐ Saw it on social media
- ☐ Found it on Ofcom's website
- ☐ Found it on another website
- ☐ Heard about it on TV or radio
- ☐ Read about it in a newspaper or magazine
- ☐ Heard about it at an event
- ☐ Somebody told me or shared it with me
- ☐ Other (please specify)

Where we are seeking input

Question 1: Is it clear which types of organisations the 10 proposed recommendations are aimed at? Please provide reasons and evidence to support your answer.

Question 2: Do you have any comments on whether they should apply to all organisations, including those of different sizes and operating models? Please provide reasons and evidence to support your answer.

Question 3: Do you have any comments on the proposed recommendations? Please provide comments in particular on their effectiveness, applicability or risks. Please provide evidence to support your answer.

Question 4: Are there any other additional recommendations you think we should consider? If so, please provide evidence to support your comment.

Question 5: Do you have any examples or suggestions of ways of encouraging services to adopt these recommendations?

Question 6: Do you have any comments on our impact assessment, rights assessment, equality impact assessment and Welsh language assessment? Please provide evidence in support your answer.