

Media Literacy by Design Self-Assessment

Name of the platform: The LEGO Group

Date: April 2025

Purpose of the document:

This document has been designed for online services¹ to demonstrate how their work and products align with the [Best Practice Principles for Media Literacy by Design](#). As you engage with this assessment, consider the following key areas:

1. **Proactivity, priority, transparency and accountability;**
2. **User-centric design and timely interventions;**
3. **Monitoring and evaluation.**

Ofcom recently became the UK's online safety regulator following the Online Safety Act 2023 (the Act) becoming law. Ofcom's media literacy work will make an important contribution to the implementation of the changes under the Act, in particular the changes to Ofcom's media literacy duties introduced by the Act. However, this work should not be interpreted as a statement of our policy on other guidance or our codes of practice under the Act or prejudice any further work to develop policy in relation to that Act. Whilst there are close links between the policy areas of media literacy and online safety, they are distinct. Our media literacy work, which includes these principles, is broader in scope than online safety, in terms of both the content and services to which it applies. In addition, as a voluntary initiative we have more discretion in the recommendations we make here than in the online safety codes. Our media literacy work goes beyond requirements specified in the Act to consider what more online services can do to support people to use, understand and create online media and communications in a variety of contexts.

With this in mind, materials submitted here may be repurposed for Ofcom's work under the Act.

We would like you to engage in a reflective process. This self-assessment form invites you to analyse how your organisation approaches media literacy on-platform (as part of the design process or through on-platform interventions).

- We specifically encourage you to identify potential areas for improvement you would like to focus on over the next few months. This approach allows us to better understand how platforms monitor and evaluate media literacy interventions on an ongoing basis, whilst allowing us to further encourage the adoption of the principles.
- We ask that you define what success looks like, and how this will be measured for each piece of work to promote media literacy on-platform. As per principle 11, we ask that you

¹ Platforms/online services include social media, search, video-sharing and gaming services.

establish media literacy outcomes and media literacy outcome indicators wherever possible.²

This self-assessment exercise is also an opportunity to share knowledge with a broader audience. Other services, academics, charities, and the general public can learn from what's currently working well and what challenges exist. We may wish to use some of the self-assessment completed to publish a summary of the work being undertaken by platforms. We would be in touch on the specifics before publication, however, it is worth flagging if there is anything commercially sensitive or confidential in your response at this point. Transparency and knowledge sharing has been [a recurrent ask from stakeholders](#). By fostering open communication and sharing insights, we can collectively enhance our understanding and drive positive change, leading to a collective commitment to media literacy.

In responding to the questions in this document, we encourage you to assess your practices and the extent to which they align with Ofcom's Best Practice Principles for Media Literacy by Design as part of actively contributing to a more informed and media literate society. We want to make knowledge sharing a formal aspiration for online services to ensure that everyone has clarity over the work that is being done and to foster collaboration between stakeholders.

Contact: If you have any questions about the Media Literacy by Design project, please feel free to get in touch with the MSOM team (makingsenseofmedia@ofcom.org.uk).

² Media literacy outcomes are ideally a benefit received by the target audience to be achieved as a result of the work. Media literacy outcome indicators are measurable pieces of evidence that allow users to track the change that has taken place as a result of their intervention.

Proactivity, priority, transparency and accountability

Please provide an update of how your platform already demonstrates adoption of at least one principle in this category. How is success measured (please provide media literacy outcomes and indicators wherever possible)?

The LEGO Group is committed to being a world-leading provider of products that embed well-being by design into digital experiences.

The RITEC ([Responsible Innovation in Technology for Children](#)) project was co-founded by UNICEF and the LEGO Group and is funded by the LEGO Foundation. The project aims to demonstrate how the design of children's digital experiences affects their well-being and provides guidance on how informed design choices can promote positive outcomes.

The research showed that well-designed digital play can provide positive and measurable contributions to children's well-being, allowing children to experience a sense of control, have freedom of choice and experience mastery and feelings of achievement. It can also help children to regulate their emotions, feel connected to others and find joy in creating and exploring as well as acting on new ideas.

In November 2024 the LEGO Group co-launched, with the LEGO Foundation, a design toolbox to offer free comprehensive resources and practical information for the gaming industry on how to design digital play experiences with children's well-being in mind. We are calling on gaming companies and businesses, across the gaming industry, to adopt it when creating digital play experiences.

Please provide an update of how your platform can make more progress to further demonstrate further adoption of principles in this category. How will success be measured (please provide media literacy outcomes and indicators wherever possible)?

The LEGO Group is working with the Alan Turing Institute on a dedicated research project to explore the potential impact of multi-model generative artificial intelligence (AI) tools on children's wellbeing.

This research is guided by RITEC with research findings analysed in relation to the eight child-centric well-being outcomes identified in the RITEC framework.

User-centric design and timely interventions

Please provide an update of how your platform already demonstrates adoption of at least one principle in this category. How is success measured (please provide media literacy outcomes and indicators wherever possible)?

The LEGO Group has partnered with the Alan Turing Institute on a research project that considers the potential impact of generative AI on children. Children have particular rights and needs that must be accounted for when designing and developing new technologies.

As generative AI technologies continue to be integrated into child-facing products and utilised by children of all ages, the LEGO Group wants to ensure businesses and policymakers have the resources to design these services in a way that support the wellbeing of children and enhances their creativity.

The project consists of two workstreams, comprising survey research on opinions of children, their carers and teachers, and school-based workshops, which will explore children's thoughts and perspectives around generative AI.

This research will be used to support the emerging policy and regulatory landscape around generative AI, as well as inform industry practices relating to the design, development and deployment of generative AI that may be accessed by children. Output will also help within educational settings, to inform the development of lesson plans to support teachers in discussing the benefits and limitations of generative AI.

Please provide an update of how your platform can make more progress to further demonstrate further adoption of principles in this category. How will success be measured (please provide media literacy outcomes and indicators wherever possible)?

Outputs from the research will be published in Summer 2025 and we will keep Ofcom updated on future developments.

Monitoring and evaluating

Please provide an update of how your platform already demonstrates adoption of at least one principle in this category. How is success measured (please provide media literacy outcomes and indicators wherever possible)?

To complement our research programmes, the LEGO Group is committed to empowering and enabling children to become smart, responsible and future-ready digital citizens and have been proactive in developing a broad Digital Empowerment portfolio which offers children and families free online activities for them to enjoy and build digital literacy skills together.

Our digital empowerment campaigns have reached more than 250 million adults globally since 2021 and we experience general high levels of engagement from children and families with our empowerment experiences.

Evaluation of our digital empowerment experiences is ongoing. Broad learnings which have been observed across our experiences include:

- a. Children generally care a lot about online safety, digital play and enjoy “levelling up” so are primed to learn about digital literacy. They are highly motivated by empathy, and learning-uptake is increased by providing messaging through an age-appropriate Social & Emotional Learning (SEL) lens.
- b. When designing play and learning experiences a mix of formats (games, video, text etc) is optimal to account for difference learning styles
- c. Parents and caregivers are often time poor and difficult to reach, it is therefore useful to include the following core elements in all our experiences: practical tools they can use to engage children around media literacy alongside information; always including an element of play; a focus on helping parents and caregivers build connection with children around digital play.

Please provide an update of how your platform can make more progress to further demonstrate further adoption of principles in this category. How will success be measured (please provide media literacy outcomes and indicators wherever possible)?

Going forward we will look to evaluate the impact of our empowerment portfolio to further understand the achieved benefit(s) from participating in our digital empowerment programmes and experiences. This work is ongoing and we will continue to engage Ofcom on this as it develops.