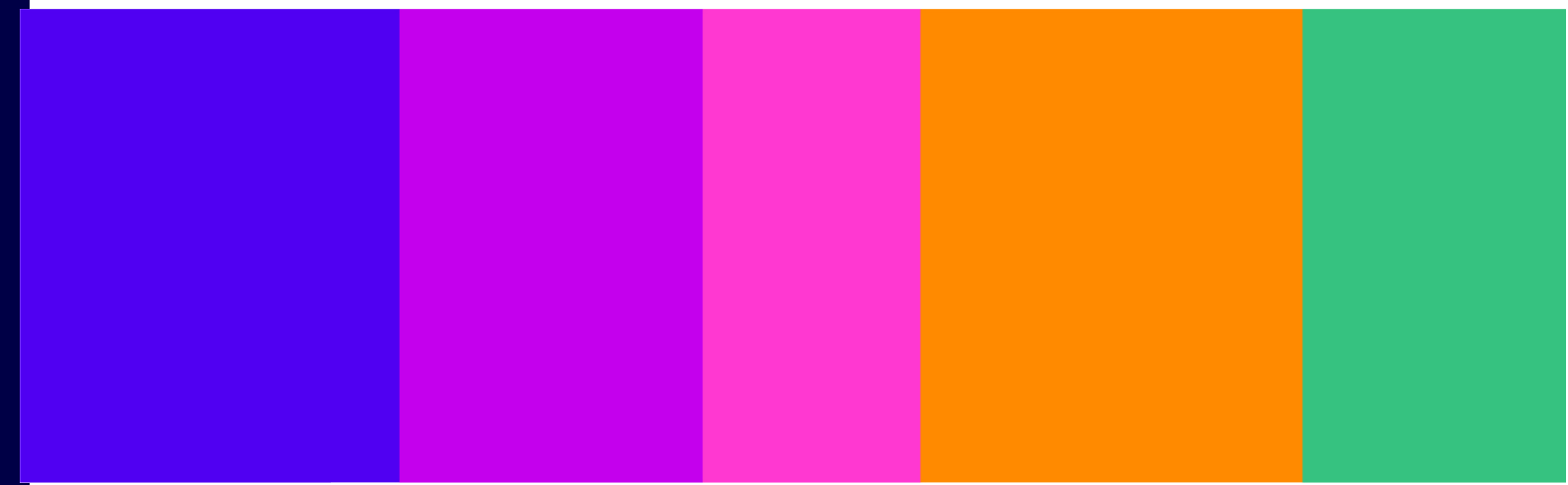


Ofcom's three-year media literacy strategy

Response to consultation responses

Statement

Published 07 October 2024



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1. Overview

1.1 This document outlines Ofcom’s response and decisions following the consultation on our three-year media literacy strategy.

1.2 In April 2024, we published our proposed three-year media literacy strategy and invited feedback on our plans to fulfil our media literacy duties and to support the advancement of media literacy across the United Kingdom. We consulted on our proposed strategy between 29 April 2024 and 24 June 2024.

1.3 Our proposed strategy highlighted Ofcom’s role as a catalyst and convenor, aiming to engage a broad audience. This included online services, broadcasters, third-sector organisations, parents, carers, health and social care providers, professionals working with children, and other key stakeholders.

1.4 We have carefully considered all the feedback we received from the consultation process. In finalising our strategy, we have taken account of a range of factors, ensuring the strategy will deliver on our duties, is aligned with our strategic goals and makes best use of available resources.

1.5 The purpose of this document is to explain our decisions and how we have taken account of the feedback we received. We hope that it will foster a better understanding of our final media literacy strategy and encourage continued engagement and collaboration with us.

1.6 It should be noted that there was broad consensus about the draft strategy and its subsections. Stakeholders expressed agreement with the overall approach of the strategy, with particular endorsement from those within the third sector and trade groups. Furthermore, several respondents agreed with the structure of the strategy and the key areas of work identified therein. In this document we have focused in particular on areas where respondents’ views were not aligned with what we set out in our proposed strategy, so that we can explain any changes we made to our strategy in response to those points, or our reasons for not doing so.

1.7 The 3-year media literacy strategy can be found [here](#).

What we have heard – in brief

We have actively engaged with and gathered inputs from a diverse range of stakeholders. The themes that were most prominent in the feedback include:

- the role of external stakeholders in setting Ofcom’s research agenda,
- the dissemination of research findings to a wider audience,
- methods of evaluation for media literacy interventions and programmes,
- the use of indicators of success and measurable outcomes in relation to Ofcom’s overall media literacy strategy,
- how Ofcom will work with online services to achieve change,
- clarification in relation to concerns about placing the onus on users rather than on online services,

- challenges related to funding for the sector,
- the role of public service broadcasters,
- working with education authorities,
- our proposals for teacher training,
- the intersection between digital inclusion and media literacy,
- artificial intelligence and future technology,
- engagement across the nations,
- the organisation of a Media Literacy Week,
- Equality impact assessment,
- Welsh language impact assessment.

2. Background

2.1 Ofcom’s mission is to make communications work for everyone. Since Ofcom’s establishment in 2003, researching and promoting media literacy has been an integral part of our work. In 2019, we revitalised our approach by launching the Making Sense of Media (MSOM) programme, which places a stronger emphasis on online media.

2.2 While Ofcom has previously published annual plans detailing its media literacy activities, this is the first time we are publishing a comprehensive [three-year strategy](#). Our strategy document aims to provide a clear roadmap for our initiatives and priorities in the coming three years.

2.3 The development of this multi-year strategy is driven in part by our new responsibilities outlined in the Online Safety Act 2023 (OSA). The OSA has provided greater clarity and specificity to our media literacy duties as originally set out in the Communications Act 2003.¹ These duties include:

Building awareness:

- **Public awareness:** Ofcom is to heighten public awareness and understanding of how people can protect themselves and others online.
- **Consideration of groups disproportionately affected by harm:** In particular, Ofcom is to consider groups disproportionately affected by harm, including women and girls, and to help users understand and reduce exposure to mis- and disinformation.
- **Ofcom’s approach:** Ofcom is to meet these duties in a range of ways (for example, pursuing activities and initiatives, commissioning or taking steps to encourage others to do so, carrying out research).

Encouraging the development and use of certain technology and systems:

- **Technology development:** Ofcom is to encourage the development and use of technologies and systems so that users of regulated services can protect themselves and others online (e.g., such as providing context to content, or helping users identify content of democratic importance).
- **Resource signposting:** Ofcom is to signpost users to resources, tools or information that can raise awareness about how to use regulated services to mitigate harms.

Publishing a media literacy strategy and annual statement:

- **Publication of strategy:** Ofcom is required to publish a media literacy strategy which sets out how we propose to exercise our media literacy functions, stating our objectives and priorities over a period of not more than three years.
- **Annual report:** Ofcom’s annual report must contain a media literacy statement on our work.

¹

See Section 166 of the Online Safety Act which amends section 11 of the Communications Act 2003

- 2.4 In April 2024, building on these duties, we published our proposed strategy. We conducted an eight-week consultation period from 29 April to 24 June 2024 to gather feedback and insights, with specific consultation questions covering each part of the strategy.
- 2.5 We received 46 written responses in total from a variety of stakeholders including third sector organisations, academics, public bodies, broadcasters, online services, and individuals.
- 2.6 To allow as many people as possible to share their view with us, we organised a series of consultation events between April and July 2024:
- Webinar: In May 2024, we hosted a webinar for those unable to attend in-person events, ensuring fair and inclusive access.
 - In-person events: In June 2024, we held in-person events in Edinburgh, Belfast, London, and Cardiff to gather feedback on our proposed strategy, considering both national and local contexts.
 - Childrens' focus groups: Between June and July 2024, we conducted focus groups to hear directly from children and teenagers about their perspectives on our plans for the next three years.
- 2.7 After carefully considering all responses and input received, this document sets out the decisions we have made. The final version of our strategy is published alongside this statement, reflecting the collective insights and contributions of our stakeholders.

3. Feedback and decisions

- 3.1 We developed our proposed media literacy strategy prioritising three central elements:
- Research, Evidence and Evaluation: This builds on our heritage of research and evidence-gathering about the daily realities of adults and children, as well as our well-received evaluation resources.
 - Engaging Platforms: Platforms are a primary conduit for communication and media consumption where media literacy issues and opportunities are most acute currently.
 - People and Partnerships: Media literacy is about people, and impact is best achieved through local trusted partners who are experts in delivery.
- 3.2 We have developed these three central elements (“Research, Evidence and Evaluation”, “Engaging Platforms” and “People and Partnerships”) following a robust process of: (1) historically reviewing what does and does not work, (2) assessing the requirements of the OSA, (3) holding a series of workshops with internal experts and (4) stress-testing our ideas with external experts.
- 3.4 Taking into account the positive feedback we received about this tripartite structure, we have decided to retain it in our final strategy.
- 3.5 To make reading and understanding easier, we have divided this section in line with each part mentioned above, setting out:
- What we said we would do – a summary of our consultation proposals in each area.
 - What we heard and the decision we made – a summary of relevant stakeholder feedback and the decisions we have taken about our strategy in each area.

Research, Evidence and Evaluation

What we said we would do

- 3.6 The aim of our work on Research, Evidence and Evaluation is to expand the breadth and depth of our insight into online and media use in the context of daily life and support for the sector in understanding ‘what works’ for the delivery of media literacy initiatives. We therefore said our work would focus on the following points:
- **Continue a research-based approach to policy development and media literacy interventions**: This will be achieved through identifying key impact measures from our datasets to help us and our stakeholders monitor ‘what works’, as well as ensuring that we assess changes in media literacy over time, using a range of core measures and using an increased range of robust and innovative methods to gain insights into priority topics.
 - **Amplify a range of voices**: This will be achieved through boosting our samples on our tracker surveys and sharing our understanding of how the issues we address in our bespoke research programme make an impact on a range of demographic and geographic groups, particularly targeting protected characteristics.

- **Share our knowledge of ‘what works’:** We will achieve this through publishing the findings from our commissioned media literacy activities, providing tools and guidance to the sector and exploring how best to signpost relevant technologies (such as watermarking or third-party plug-ins such as NewsGuard).
- **Support the sector to carry out evaluation:** This will be achieved through training and resources, the creation of frameworks and associated indicators of success, and requiring evaluation from commissioned organisations.

What we heard and the decision we made

On the role of external stakeholders in helping to inform Ofcom’s research agenda

What we heard:

Several respondents expressed a desire to collaborate with Ofcom, identify synergies with their own work, and contribute to Ofcom’s research agenda. [Internet Matters](#) encouraged Ofcom to involve the sector more actively in deciding the focus of ongoing media literacy research. They suggested more frequent engagement and consultation exercises. [The University of Southampton, Queen Mary University of London, Lancaster University, and Birmingham City University](#) recommended that Ofcom consult the breadth of existing academic work.

Respondents emphasised the need for more inclusive research that considers a range of underserved communities and needs, including intersectionality. [Bournemouth University](#) highlighted that priority groups identified in the draft strategy should not be considered in isolation, as intersecting identities increase the risk of online discrimination. [The Department of Media and Communications at the London School of Economics](#) also stressed the importance of explicitly acknowledging intersectionality in the focus on women and girls.

Various specific areas for Ofcom’s research focus were suggested by a number of stakeholders. For example, [Parent Zone](#) advocated for research on the ‘transmission of media literacy skills from parents/carers to children and the role of parents in shaping children’s media literacy behaviours’. [Full Fact](#) asked Ofcom to consider how mis- and disinformation risks intersect with those posed by Generative Artificial Intelligence (Generative AI). The [Advertising Association/Media Smart](#) (AA Media Smart) suggested expanding research to include understanding ‘epistemic bubbles’ and echo chambers.²

What we have decided:

- 3.7 We welcome and value the input that third-sector organisations, as well as academics, bring to our media literacy work and research, and our draft strategy already encompassed this. For example in our draft strategy, we said we would create opportunities for stakeholders to share their expertise with us through events for our network of individuals and organisations with a shared interest in media literacy, as well as through our Advisory Panel and working groups (see 4.7 of our draft strategy), and we have retained this point in our final strategy.

² *Echo chambers* are epistemic environment in which participants encounter beliefs and opinions that coincide with their own. See Diaz Ruiz, C., & Nilsson, T. (2023). Disinformation and Echo Chambers: How Disinformation Circulates on Social Media Through Identity-Driven Controversies. *Journal of Public Policy & Marketing*, 42(1), 18-35. <https://doi.org/10.1177/07439156221103852>

- 3.8 We particularly recognise the importance of such stakeholders as we focus on amplifying the voices and testimony of a range of groups within society. We already engage widely with various stakeholders via our [Network](#) and Working Groups, and their research informs our own agenda. As outlined, in section 2.6 of our final strategy, we will continue to talk to these organisations and to ensure our research is useful to as many stakeholders as possible.
- 3.9 Whilst not set out explicitly in our strategy, we intend to put out a call for membership of our new Research, Evidence, and Evaluation Working Group in Autumn 2024.³ The group will comprise members from third-sector organisations, as well as academics, and will meet quarterly for the duration of the strategy period. Our annual research plans will be presented to the working group for discussion and feedback. We do not issue formal consultations on our research priorities, and so we would encourage organisations with specific interests in our research to respond to the call to participate in the working group. Minutes of meetings will also be available upon request.
- 3.10 We acknowledge the need to further explore a range of underserved communities and groups with diverse needs in our research, and to consider the intersectionality of such groups and needs. We set out in our draft strategy document our proposal to boost our tracker samples to amplify the voices and testimony of a range of groups within society and ensure these voices are considered across our research programme, and we have retained this element in our final strategy. This research will be used to inform our broader media literacy work.

On the dissemination of research findings to a wider audience

What we heard:

Some respondents to the draft strategy called for research findings to be disseminated to a wider audience in more accessible ways, ensuring the insights are understood, considered, and actioned appropriately. For example, [Mencap](#) encouraged Ofcom to use the networks of disability charities and campaigners to widely distribute media literacy tools. [Michelle Rihoy](#) highlighted that Ofcom should focus on how to share information with colleagues across the public sector, including combined and local authorities.

The [University of Southampton, Queen Mary University of London, Lancaster University, and Birmingham City University](#) also asked if meetings with educators would be included in the strategy to ensure research findings are effectively shared with them.

In one of our focus groups, young people also suggested presenting information in a ‘child-friendly’ manner to help younger users learn about media literacy. They recommended using online advertisements, workshops, or events to promote media literacy.

What we have decided:

- 3.11 Goal 2 for ‘Research, Evidence and Evaluation’ in our draft strategy set out our intention to amplify the voices and testimony of a range of groups within our society and to make our research as useful to as many people and organisations as possible. We have retained these points in our final strategy. We will share our research findings with a wider range of audiences, including underrepresented groups and the general public through packaging

³ The call for membership for our Research, Evidence and Evaluation Working Group will be published on the Ofcom website during Quarter 4 2024. The new working group will commence in Spring 2025

our material for a variety of stakeholders (including those *outside* the media literacy sector), continuing to speak at events, and finding ways to effectively communicate our core findings and messages.

- 3.12 This work has already begun, for example through the TikTok explainers that accompanied the publication of our media literacy tracker reports this year.⁴ To further support our work in relation to Goal 2 for ‘Research, Evidence and Evaluation’, we welcome opportunities to collaborate with our network of stakeholders to develop engaging and accessible ways of disseminating our key research programmes. To ensure research can be considered and actioned by our stakeholders, we will continue to plan our research topics so that they are complementary and provide a clear narrative to stakeholders. As stated in the Strategy, we will also take the opportunity to conduct further secondary analysis of existing datasets.

On methods of evaluation

What we heard:

Several respondents highlighted the need for more consistent measures of media literacy to strengthen evaluation approaches. [RNIB](#) and [Youthwork Consulting](#) both considered evaluation essential to measure the effectiveness of media literacy programmes. Similarly, [Internet Matters](#) stressed the importance of robust evaluation for understanding the efficacy of media literacy programme design and delivery.

The [Media and Information Literacy Alliance \(MILA\)](#) echoed these views, emphasising the need for a greater understanding of how to evaluate media literacy interventions and identify success indicators. [IREX](#) also advocated for the consistent use of the same tests to enable better benchmarking and reliable comparisons between evaluations.

What we have decided:

- 3.13 Ofcom has made a significant contribution in this area with the publication of our [Evaluation Toolkit](#).⁵ We have published an addition to our toolkit - a set of media literacy outcomes, indicators, and measures to enable grassroots organisations to conduct impact evaluations of their activities. In our draft strategy, we said we would boost our evaluation toolkit to further empower those running media literacy programmes to evaluate their own project and share those findings. We have retained this point in our final strategy where we link to the new evaluation resource. We will continue to build on our existing work supporting providers of media literacy initiatives to conduct effective and proportionate evaluations.
- 3.14 Our own media literacy tracker surveys provide a range of metrics that represent the key aspects of media literacy and will show the extent of change over time among UK adults and children. In our draft strategy, we said we would identify some of the key impact measures from these datasets to help ourselves and our stakeholders monitor ‘what works’ for their targeted initiatives. We have decided to retain these points and will ensure that we assess changes in media literacy over time, using this range of core measures.
- 3.15 Our ambition is to encourage a culture of evaluation for a range of interventions which focus on sharing, what works, and continuous learning. In order to fulfil and embed this culture more widely, we will focus on knowledge-sharing through workshops, surgeries, and

⁴ See the TikTok explainers on [five trends in adults' online media diets](#) and [children's media habits](#).

⁵ The toolkit was last updated on 10 September 2024 with the publication of the [outcomes bank](#).

webinars. This is referenced in our final strategy where we set out how we will meet goal four.

On the use of indicators of success and measurable outcomes in relation to Ofcom's overall media literacy strategy

What we heard:

Several respondents encouraged Ofcom to provide clearer indicators of success and more concrete measurable outcomes for evaluating the media literacy strategy. [The End Violence Against Women Coalition and Glitch](#) expressed disappointment at the lack of details on how Ofcom would measure the success of its strategy. Similarly, [AA Media Smart](#) felt that the indicators of success in this chapter were vague and called for more concrete measures.

The [Mhor Collective](#) stated that the goals and their indicators of success seemed very open, making it difficult to objectively measure success or failure. The lack of specificity regarding the indicators of success was also raised at our June 2024 events held in Belfast, London, and Cardiff. Participants asked how Ofcom would objectively measure success against all the goals set in the strategy.

What we have decided:

- 3.16 We are under a duty to publish an annual media literacy statement that includes a summary and evaluation of our media literacy activities and initiatives.⁶ For initiatives we commission from third parties, we will continue to require impact evaluation.
- 3.17 Sections 2.10, 3.10 and 4.15 of our draft strategy outlined some of the indicators of success for each of the three chapters. Given the feedback we received, we have added a new goal to address this specific point in our final strategy.
- 3.18 In Goal 5 of chapter two in the final strategy, we set out that we will evaluate the impact of the three-year media literacy strategy using an evaluation framework. Our activities across the MSOM programme will also be set out each year in the annual plan and we will report whether these have been achieved.

Engaging with platforms

What we said we would do

- 3.19 Our proposed outcome for this part of our draft strategy was that by 2027, online services will provide better media literacy support for their users, evaluate the impact of this support, and longer-term funding for initiatives that help provide this support. We said we would focus on the following points:
- **Role of online platforms and services:** Online platforms and services play a crucial role in promoting media literacy. Ofcom's responsibilities for online safety and media literacy are interconnected, and media literacy may be included in online safety codes of practice.
 - **Ongoing evaluation and funding:** Online services' funding of third-party media literacy projects is valuable, but it faces challenges like short-term funding, pressure for new

⁶ Communications Act 2003, section 11A(8), as introduced by the Online Safety Act 2023

content, and content tailored to brand values rather than user needs. We suggested that online services continuously evaluate the impact of their media literacy support and fund long-term initiatives to improve it.

- **Research and policy development:** We said we would use the research and engagement we carry out for our media literacy work to inform our policy development for online safety, and vice versa. However, we expected our media literacy work to be broader in scope and to focus more on best practice, which goes further than the compliance requirements of the services' online safety duties.
- **User experience and prioritisation of media literacy:** What happens on platform must be part of the solution to existing and future media literacy challenges. Some platforms and online services already deploy features and tools, such as pop-ups and notifications, to provide context to the content their users see. Online experiences should address media literacy challenges. Platforms need to prioritise media literacy interventions and be transparent about their design and outcomes, while working on understanding user perspectives on what is helpful.

What we heard and the decision we made

On how Ofcom will work with online services to achieve change

What we heard:

There was overall agreement with the strategy's proposals for working with platforms, with stakeholders supporting the promotion of best practices and requesting progress reports on uptake and alignment between online safety and media literacy. Respondents also agreed that online services have a responsibility towards their users' media literacy. [AA Media Smart](#) agreed with our proposal to promote the [Best Practice Principles for Media Literacy by Design](#). Similarly, [Good Things Foundation](#) expressed the view that tech companies are uniquely positioned and therefore have a critical role to play in relation to digital media access and literacy.

Whilst a significant number of respondents agreed with our draft strategy regarding online services' role in promoting media literacy, they also raised concerns about Ofcom's ability to compel platforms to act without regulatory levers and asked for more clarity on the tools that would be used.

Some stakeholders expressed concerns about how Ofcom will hold online services to account and that the strategy was neither strong enough nor sufficiently connected to the online safety regime. [The National Literacy Trust](#) raised concerns regarding the lack of clarity about how Ofcom will ensure that online services are compelled to work on media literacy interventions.

In relation to these concerns, [Parent Zone](#) encouraged Ofcom to make media literacy part of its compliance regime. [Internet Matters](#) also suggested that Ofcom further work to draw explicit links between media literacy and the online safety codes of practice, given that little detail on the levers Ofcom will use were included in the draft strategy. [Consumer Scotland](#) also suggested that progress in relation to best practices should be reported as part of Ofcom's wider programme of publications.

What we have decided:

- 3.20 As set out in Goal 1 of the Engaging Platforms’ section in our final strategy, we will build on work prioritising users’ media literacy on platform by promoting best practice through designing in media literacy.
- 3.21 We will continue to explore how to best use the range of regulatory powers we have to encourage regulated services to promote and develop the media literacy of their users. This may include our evidence gathering powers. This is in addition to voluntary engagement in best practice initiatives such as the [Best Practice Principles for Media Literacy by Design](#). We believe voluntary approaches can enable a different type of progress – focussed more on creative innovation and agility in response to emerging harms, which has a place alongside the suite of regulatory levers.
- 3.22 We will also consider whether aspects of the wider online safety regime, such as transparency reporting can play a role in helping us to monitor what progress online services make in promoting media literacy.
- 3.23 As stated in section 1.10 our final strategy, to build on work prioritising users’ media literacy, we will:
- Work with platforms that have pledged to adopt the Best Practice Principles for Media Literacy by Design to drive further action and monitor/ report on whether platforms honour their commitment.
 - Build collective understanding of what users consider helpful to better navigate the online environment and to foster more positive experiences online.
 - Continue to build collective understanding on what users expect from online services to make the online environment better and more positive.
 - Turn our research into actionable insights for platforms by highlighting what works best for users, what good looks like and using our influence to encourage platforms to make changes to their products and services informed by users’ expectations.

In line with our duties in the Online Safety Act, we will produce a statement setting out how providers of regulated services, might develop, pursue and evaluate activities or initiatives relevant to media literacy in relation to regulated services.

On placing the onus on users rather than on online services

What we heard:

A number of stakeholders, particularly from the third sector, expressed concerns about placing the responsibility for media literacy on end-users rather than online services. [Barnardo’s](#) emphasised that the responsibility should not fall onto children, young people, parents, and carers when online abuse occurs. They were also concerned that media literacy might be used by online services to ‘gloss over’ the need for regulation and content moderation. Whilst supporting the overall plans to engage industry, stem4 also cautioned that ‘media literacy by design’ should not result in an excessive cognitive burden being placed upon end-users.

Respondents from [Bournemouth University](#) echoed these concerns, stating that the responsibility for online safety should not fall on users. They highlighted that this approach could disproportionately affect women and girls, marginalised communities, and those with ‘poor media literacy’. [The Guardian Foundation](#) also warned that media literacy by design

may risk absolving platforms of their responsibility to act in regard to their users' media literacy.

What we have decided:

- 3.24 Ofcom's regulatory responsibilities for online safety and its media literacy role are interrelated - with the opportunity to complement one another. To demonstrate how we prioritise media literacy across our work with online services, we have used clearer and stronger language in our final strategy to reassure stakeholders that we will aim to use our powers and duties under the OSA to monitor what progress online services make in promoting media literacy (see sections 3.11 and 3.12 of the final strategy).
- 3.25 Platforms will need to prioritise interventions supporting media literacy and be more transparent about their design and outcomes. Building on our [Best Practice Principles by Design](#), we want to better understand how else users think platforms can promote their media literacy, so that they can protect themselves, function and flourish online.
- 3.26 We will use the full range of regulatory levers we have, and seek to monitor and influence how online services promote and develop the media literacy of their users/audiences. We want to make media literacy a design priority for platforms, requiring them to do more, rather than put undue onus onto users. This includes:
- Working with the major platforms (Roblox, Google Search, Pinterest, LEGO, Epic Games, etc.) pledging to adopt the Best Practice Principles for Media Literacy by Design to monitor and publish progress on platform.
 - Encouraging more services to adopt the Best Practice Principles for Media Literacy by Design.

On challenges related to funding for the sector

What we heard:

Some respondents requested that Ofcom provide resources and capacity to delivery organisations for evaluation and ensure sustainable funding. Multiple respondents emphasised the necessity for Ofcom to support long-term work, rather than ad-hoc initiatives through sustainable funding. At the London event in June 2024, participants also suggested that Ofcom should incentivise organisations to prioritise long-term funding, and highlighted the importance of a broader funding base beyond direct platform contributions.

Additionally, respondents stressed the need for consistent, aligned, and sustainable platform funding for media literacy initiatives. The [UK Safer Internet Centre \(UKSIC\)](#) underscored the importance of multi-year investments to develop effective programmes.

Concerns were raised about the independence of platform-funded interventions and the potential influence of online services on the programme delivered. The [Scottish Council for Voluntary Organisations \(SCVO\)](#) supported Ofcom's proposals for greater platform contributions but emphasised the need for a collaborative and co-productive approach that considers both users and organisations' needs. Similarly, [Yoti](#) suggested that Ofcom develop guidance to address limitations associated with online services funding third-party interventions.

What we have decided:

- 3.27 We recognise the concerns that funding levels from regulated services are often inadequate and that funding is often short-term, linked to funder priorities rather than user needs and often comes with significant caveats. We do not believe this is appropriate, as it leads to unnecessary duplication in resource creation, and the constant pursuit of new resources often comes at the cost of dissemination of existing quality resources.
- 3.28 We will illuminate the impact that investment by online services and broadcasters in media literacy has. This may include using our information gathering and transparency powers, to explore the effectiveness of investment on product and in developing the media literacy of users. By building a clearer picture of the measures and resourcing already committed to media literacy, we can then better determine if Ofcom needs to take further action.

On our work exploring how broadcasters might address media literacy considerations

What we heard:

A few respondents also mentioned the role of broadcasters in promoting media literacy. [MILA](#) said that they felt there should be a special mention in the strategy acknowledging the role of public service broadcasters, as a potential trainer on issues of media literacy empowerment and lifelong educations. Ofcom's [Advisory Committee for Scotland](#) welcomed the commitment within the strategy to explore how Public Service Broadcasters (PSBs) might address media literacy considerations and suggested more could be done to continue and broaden this work.

Participants at our events in Cardiff and London, as well as our webinar also feedback that Ofcom should engage with broadcasters on media literacy.

What we have decided:

- 3.29 We acknowledge that public service broadcasters (PSBs) already contribute to media literacy, providing trusted news and education content, and running media literacy projects.
- 3.30 We also note the role of the BBC in shaping the wider information ecosystem to develop and implement standards that help audiences to interpret the media (such as its CP2A work).⁷
- 3.31 We have therefore added a new goal in our strategy. In section 3.14 of the final strategy and as set out in our [Terms of Reference](#), our Public Service Media (PSM) review will explore how broadcasters and platforms can support the media literacy of audiences to help them mitigate the impact of mis- and dis-information
- 3.32 In addition, as part of our work to implement the Media Act 2024, we are updating our guidance for PSBs on what should be included in their statements of programme policy – an annual report about how they meet their PSB obligations. We expect to retain in this guidance a requirement for PSBs to detail their media literacy activities.

⁷ The [Coalition for Content Provenance and Authenticity](#) (C2PA) addresses the prevalence of misleading information online through the development of technical standards for certifying the source and history (or provenance) of media content.

- 3.33 We will also engage with the BBC as part of our ongoing performance programme, assessing the BBC's delivery of duly accurate and impartial news and formal and informal educational content. Further, we will build an understanding of how it is using its unique position to support media literacy and the learning of audiences of all ages.

People and Partnerships

What we said we would do

- 3.34 To ensure that more individuals have access to the skills and support necessary to navigate content and thrive safely online, we proposed to focus on the following points in our draft strategy:
- **Importance of media literacy for all age groups**: We emphasised the necessity of media literacy skills across all age groups, dispelling the myth that younger individuals inherently possess these skills.
 - **Collaborating with trusted voices**: We said that media literacy interventions are most effective when delivered by trusted voices, whether these are professionals or individuals from the same community or with similar experiences as the participants.
 - **Equitable approach**: We pledged to concentrate our efforts on communities with specific needs, such as those experiencing financial disadvantage, older people, and children. This ensures that resources are allocated where they are most needed, in the spirit of equity.
 - **Child rights-based approach and prioritisation**: We committed to aligning our work with the United Nations Convention on the Rights of the Child (UNCRC), particularly Article 17, which pertains to access to information from a variety of media sources. We also pledged to consider children's views and focus on children with specific characteristics who are more likely to require support with their media literacy skills.
 - **Addressing misinformation, disinformation, and harmful content**: We committed to applying this equitable approach across all topics our work addresses, including misinformation, disinformation, and harmful content and activities that disproportionately affect women and girls.
 - **Partnerships and collaboration**: We emphasised the importance of partnerships with third-sector organisations, local authorities, and international stakeholders to share insights and effective practices.
 - **Media Literacy Week**: We said we would consider LSE's recent suggestion of a national Media Literacy Week as suggested in its report for the Department of Science, Innovation and Technology (DSIT).⁸

⁸ See LSE (2023). [Cross-sectoral challenges to media literacy](#). Ref: DSIT Research Paper Series Number: 2023/032.

What we heard and the decision we made

On working with education authorities

What we heard:

While several stakeholders welcomed our proposed approach for education, some stakeholders expressed concern about a lack of media literacy education in schools.

[Barnardo's](#) suggested that Ofcom should take a 'what works' approach to inform educators about best practice in delivering the Relationships, Sex and Health Education (RSHE) curriculum in schools in England. The [Media and Information Literacy Alliance \(MILA\)](#) and the [Guardian Foundation](#), as well as participants at the event in London, requested that Ofcom continue working with the Department for Education (DfE), including to embed media literacy in the national curriculum for England.

Young people from one of our focus groups thought that media literacy would fit in Life and Work lessons,⁹ which are part of the curriculum in Northern Ireland.

This proposal was not universally supported, [stem4](#) questioned whether so much emphasis on the education system should be the priority, given that schools are already under significant pressure.

What we have decided:

- 3.35 Ofcom is not responsible for education policy, but we recognise the importance of collaborating with the authorities responsible for education in each nation. We have therefore updated our final strategy to reflect this. In section 4.11 of our final strategy, we commit to:
- Continuing to develop relationships with the education departments in each nation to provide media literacy support: the Department for Education (DfE) in England, Education Scotland, the Department for Education and Skills (DfES) in Wales and the Education Authority in Northern Ireland, as well as relevant stakeholders such as children's commissioners, Skills England and education regulators.
 - Working with the Welsh Government to understand the impact of the Digital Competence Framework on media literacy skills among children and young people in Wales and sharing that insight with other relevant Government departments and National Administrations as necessary.
- 3.36 Since the publication of our draft strategy, both a curriculum review and the creation of Skills England have been announced.¹⁰ This may provide us with an opportunity to utilise our expertise and embed critical thinking across a range of subjects, and to use our evidence if appropriate to support Skills England.

On teacher training

What we heard:

⁹ [Learning for Life and Work](#) is a compulsory Area of Learning at Key Stage 3. It has four subject strands: Employability, Local and Global Citizenship, Personal Development, and Home Economics.

¹⁰ See [Government launches Curriculum and Assessment Review - GOV.UK \(www.gov.uk\)](#) and [Skills England to transform opportunities and drive growth - GOV.UK \(www.gov.uk\)](#) for details.

There was considerable support for our plan to train professionals, including teachers. [IREX](#) shared their experience of developing media literacy teacher training in Ukraine. Media literacy was integrated into instructors' activities, and external evaluation conducted in 2021 demonstrated the effectiveness of this approach.

Attendees at our stakeholder event in London queried teachers' capacity to take on media literacy. The [National Literacy Trust](#) questioned embedding media literacy in Initial Teacher Training (ITT) due to the limited time in the course, while the [Guardian Foundation](#) suggested that any training needs to be done in collaboration with expert media literacy organisations. [Internet Matters](#) suggested that Ofcom should develop a universal media literacy offer through schools.

In addition, many respondents requested that the offer be extended. For example, the [Media and Information Literacy Alliance \(MILA\)](#) suggested that librarians should be trained. Attendees at our event in Edinburgh suggested the inclusion of youth workers. Young people also highlighted the role of youth workers and sports coaches and highlighted that training needs to be tailored to meet the needs of the workforce being trained. Many organisations and young people highlighted a need for training and support for parents.

What we have decided:

3.37 We have decided to narrow our focus and target our limited resource for workforce development on teacher training as part of our final strategy. This can be found in section 4.11 in the strategy. We welcome collaboration on this work from the DfE (England), Education Scotland, the Department for Education and Skills (Wales) and the Northern Ireland Education Authority. Our expectation is that this learning will be useful to inform what might work in other sectors. We will:

- Seek to understand what Continuing Professional Development (CPD) related to media literacy is already on offer in England and to commission delivery of existing training courses, rather than create a new one.
- Work with regional partners to understand what works in media literacy education and share our learnings with teachers, senior leaders, and relevant education authorities.
- Collaborate with Multi-Academy Trusts (MATs) in England to ensure their schools are equipped to support and signpost parents with a view to developing this into a national approach.

On digital inclusion and media literacy

What we heard:

Multiple respondents mentioned that digital inclusion and digital skills are foundational to media literacy and therefore Ofcom should do more to support that work to enable the conditions for media literacy.

Attendees at our event in June 2024 in Belfast saw digital inclusion as the responsibility of service providers. [Good Things Foundation](#) offered to support Ofcom in the aim of building on the digital inclusion infrastructure through their network of Digital Inclusion Hubs.

The [Scottish Council for Voluntary Organisations \(SCVO\)](#) also suggested that Ofcom takes the broadest possible view of 'digital inclusion', moving beyond local delivery partners and considering wider infrastructure including telecoms and the role they play in this work.

There was a demand from attendees at our event in Cardiff for Ofcom to collaborate with the Welsh Government and other experts by joining the Digital Inclusion Alliance Wales.

What we have decided:

- 3.38 We are conscious of the cross-industry and complex nature of digital inclusion. In Ofcom's Future of TV Distribution report, we looked at the future of digital terrestrial television through a broad scope, considering the implications for access to and take up of broadband as well as the accessibility and usability of different TV interfaces. We will work with consumer groups and industry to further deepen our understanding of the barriers to broadband take-up, and the sizes of different audience groups facing each barrier.
- 3.39 As set out in section 4.12 of our draft strategy, we said we would work on the development of our 'place-based' model of media literacy where local experts build on the existing offer in their community and embed media literacy into local digital strategies and/or digital inclusion offers. We have retained this in the final strategy and, given the feedback received in the consultation, we have also decided to build on this, adding in:
- Working with the Good Things Foundation to support Digital Inclusion Hubs to offer media literacy.
 - Joining the Digital Inclusion Alliance Wales and the Local Government Association's Digital Inclusion Network in England.

On our work on Artificial Intelligence (AI) and future technology

What we heard:

[Parent Zone](#) commented that new and emerging technologies will present challenges for media literacy that current models and initiatives are not set up for. They stated that the following should be priority areas for the strategy: understanding the additional literacies and skills people need in relation to generative AI and immersive and extended realities; knowing what initiatives are most effective and demonstrating how best to provide support in these contexts.

[Good Things Foundation](#) made a similar point and went further, stating that it is more vital than ever that Ofcom lead and use their power, resource, and relationships to fully ensure that platforms play their fullest part.

[Common Sense Media](#) stated it is important to take into account the ever-evolving landscape of generative AI when considering what best practices look like and that Ofcom and other policy-making organisations should hone in on the key best practices (supported by evidence, but also relevant to the ever-evolving nature of generative AI), and focus on those particular strategies, tips, and actions.

[MILA](#) made the point that the strategy would benefit from explicit references to generative AI.

What we have decided:

- 3.40 Section 4.14 of our draft strategy referred to plans on future technologies. We recognise that it was not clear to respondents what this work would consider and have clarified section 4.14 section of the final strategy. We will undertake a collaborative workstream of internal and external experts and stakeholders to conduct thematic reviews of key

elements of life online and how AI, and other future and emerging technology may influence users' experience. The workstream will identify the media literacy opportunities and challenges and co-develop policy and practical recommendations to support the media literacy sector and beyond.

- 3.41 This work will require an ad-hoc working group of experts from the media literacy sector and beyond. This group will be supported to examine a specific cross cutting theme, such as inter-personal relationships, or advertising online in the light of AI and other future and emerging technologies. The group will consider what media literacy skills people will need to take full advantage of those technologies.
- 3.42 The group will then develop recommendations for the sector that can include policy and programme recommendations, and these will be shared with the aim of encouraging the sector to integrate these thoughts and recommendations into their work.
- 3.43 This approach will help support those working on media literacy to understand the practical implications for how people's day to day lives may be impacted by AI and other future and emerging technologies. By making this a collaborative piece of work, we can increase the likelihood that the recommendations are useful for the media literacy sector and beyond.
- 3.44 To ensure this is clearer, the final strategy explicitly discuss AI in the context of these plans.

On our engagement in the nations

What we heard:

A handful of respondents asked for more details regarding Ofcom's engagement in the devolved nations and how this would align with local contexts.

There was broad consensus between the [Scottish Council for Voluntary Organisations \(SCVO\)](#) and the [National Literacy Trust](#) who both recommended that Ofcom work with experts and partners in the devolved nations.

What we have decided:

- 3.45 In order to reflect respondents feedback, the final strategy has been updated to include work that outlines our plans for ongoing work and engagement across the devolved nations. Specifically:
- From 2024 to 2027, we will deliver a bespoke media literacy engagement plan for the nations that recognises local contexts and needs.
 - We are developing plans to address this informed by our approach over the past few years. Since 2022, we have hosted an annual event in each of the UK's four nations over a week in June. These have been well received and have enabled us to make connections with key players in each nation, deepen our understanding of the local context and facilitate networking and ideas sharing, in our role as convenor and catalyst.
- 3.46 This bespoke approach will be driven by local context and delivered within our resourcing restraints. We envisage between two and four outputs a year in each nation, timed to align with where the devolved governments' timetables offer media literacy challenges and opportunities such as elections, key strategy development and publications, legislation and debates.

3.47 To do this we have decided to work with key stakeholders to build a media literacy strategy shaped by local context in each nation. Outputs might include:

- Events such as: roundtables, discussion events and stakeholder events;
- Convening work (i.e. bringing stakeholders together);
- Ofcom staff speaking at relevant discussion events and conferences in each nation;
- Nation-specific media literacy working groups;
- Utilise Ofcom's influencing role to make policy recommendations on media literacy to devolved administrations.

On organising a Media Literacy Week

What we heard:

We received limited evidence of the potential impact of a Media Literacy Week. [IREX](#) highlighted that such initiatives can successfully engage a significant number of people. Stakeholders also had mixed views on the benefits of a Media Literacy Week.

Some stakeholders were supportive of an initiative like the Media Literacy Week. The [Samaritans](#), [Mencap](#), the [Welsh government](#), as well as [Logically Facts](#) welcomed the idea of a Media Literacy Week to promote the importance of this topic and get more people involved. [AA Media Smart](#) also believed this could be a 'valuable initiative, provided it is carefully designed and executed.'

[MILA](#) and the [Guardian Foundation](#) both recommended aligning it with the European Union Media Literacy Week and UNESCO's Global Media and Information Literacy Week. The Guardian Foundation however flagged that this should not be a priority for significant resources to be devoted to. The response from the [University of Southampton](#), [Queen Mary University London](#), [Lancaster University](#), [Birmingham City University](#) also highlighted the fact that a Media Literacy Week could be well integrated into the school curriculum and extracurricular activities.

While they did not oppose a Media Literacy Week, the [End Violence Against Women and Girls Coalition \(EVAW\) and Glitch](#) cautioned Ofcom against putting resources into this. The [National Literacy Trust](#) recognised that a Media Literacy Week 'could serve as an excellent catalyst for initiating conversations and activities around media literacy.' However, they highlighted that such an initiative could risk being tokenistic if not complemented with ongoing, targeted interventions. The [Advisory Committee for Wales](#) also flagged that a Media Literacy Week could take up resources that could be more usefully expended elsewhere. [Stem4](#) considered that a Media Literacy Week could be helpful, with the caveat that this will be in 'competition' with other awareness weeks.

What we have decided:

3.48 Given the lack of firm evidence on the effectiveness of a Media Literacy Week, we have decided not to pursue the idea and therefore have not included it in our final strategy. We have instead decided to focus on:

- Organising events for our network of individuals and organisations with a shared interest in media literacy, as well as for our Advisory Panel and working groups.
- Delivering a bespoke media literacy engagement plan for the nations that recognises local context and needs in each place.

3.49 Through our work to make media literacy everyone's business we will explore including media literacy outcomes in weeks or days run by others that promote adjacent or similar themes.

Equality impact assessment

What we said we would do:

- 3.50 In our draft strategy, we said we would:
- Prioritise groups more likely to need support with their media literacy including communities experiencing financial disadvantage, older adults, children, people with learning disabilities and/or cognitive impairment.
 - Promote a child-rights-based approach based on the UNCRC.
- 3.51 We had not identified any adverse impacts on specific groups of persons that were likely to be affected in a different way to the general population.
- 3.52 Lastly, we said we would continue to consider the impact on persons sharing protected characteristics for individual projects and work programmes contained in the strategy as appropriate and at relevant times.

What we heard:

Most respondents who commented on this section agreed with our impact assessment. [Nexus NI](#), [AA Media Smart](#), and the [Advisory Committee for Scotland \(ACS\)](#) concurred with the equality impact assessment.

The [Scottish Council for Voluntary Organisations \(SCVO\)](#) agreed that the strategy is likely to have a positive impact on minority communities and encouraged Ofcom to adopt a co-productive approach to ensure sustained inclusion and equality. The [Samaritans](#) also highlighted the need to include individuals with lived experience in our work. Whilst they supported our proposals for targeted work to prioritise groups likely to need additional support with media literacy, they recommended that this be informed by subject matter experts. The [Mhor Collective](#) echoed these thoughts and suggested using participatory processes to include people deemed in scope.

[VoiceBox](#) supported the child-rights-based approach but asked for more details and suggested that children be consulted on work that impacts them. [Barnardo's](#) also agreed that the strategy is likely to have a positive impact on children.

[Big Brother Watch](#) suggested that Ofcom's equality impact assessment consider whether targeting specific groups with certain interventions in an online context could inadvertently have a negative impact, particularly if these groups are then subject to additional profiling or targeted with messaging in a way that could perpetuate distrust.

The [Bradford African Community](#) invited Ofcom to consider those experiencing language barriers as another specific group of interest in its work.

What we have decided:

- 3.53 Whilst we do not discuss these points directly in the final strategy, we are committed to:
- Balancing a universal media literacy offer with targeted support for those who need it most. These groups include communities experiencing financial disadvantage, older adults, children and people with learning disabilities and/or cognitive impairment.
 - Undertaking Equality Impact Assessments (EIAs) as we deliver the individual areas of the final strategy.

- Considering children’s rights as we deliver the strategy. This will include consulting children on any work that affects them and upholding their rights, especially UNCRC article 17 (access to information from the media).
- Continuing to consider the impact on persons sharing protected characteristics for individual projects and work programmes contained in the strategy as appropriate and at relevant times.
- Considering the feedback we received from stakeholders as we undertake our delivery of the strategy.

Welsh language impact assessment

What we said we would do:

- 3.54 To make sure that our work is does not have any adverse effects on the use and treatment of the Welsh language as well as their speakers, we said that, in our view, the implementation of our three-year media literacy strategy would not have any adverse effects on the use and treatment of the Welsh language.
- 3.55 We also committed to continue to consider the Welsh language in projects and work programmes contained in the strategy as appropriate and at relevant times.

What we heard:

Most respondents did provide any comments on our impact assessment for the Welsh language.

[Nexus NI](#) and [Wikimedia](#) agreed with the assessment we shared. The [National Literacy Trust](#) highlighted the fact that current proposals only met the minimum Welsh language policies. They therefore flagged the need to carefully consider the Welsh language and consult Welsh speakers and experts.

A few respondents highlighted the need for Ofcom to thoroughly consider the needs of Welsh speakers. The Welsh government asked Ofcom to consider how Welsh language speakers are able to engage and contribute to any delivery programme related to media literacy. The [Advisory Committee for Wales \(ACW\)](#) also highlighted that the knowledge and lived experiences of Welsh speakers needed to be harnessed by Ofcom and incorporated in any media literacy strategies, engagement and activities. They also emphasised the fact that the latter should be done in Wales and by Welsh speakers themselves.

Lastly, the [Advisory Committee for Scotland \(ACS\)](#) did not comment on the proposals for the Welsh language. They however felt that it was important to record that the status of Gaelic and Scots languages was being discussed within the Scottish Parliament in relation to the Scottish Language Bill 2023.

What we have decided:

- 3.56 Whilst the Welsh language will not have a dedicated section in our strategy, the needs of Welsh speakers will be considered in all aspects of our work.
- 3.57 We are committed to ensuring that our communications and initiatives are inclusive and accessible to as many people as possible, including Welsh speakers.

- 3.58 Additionally, we will adapt our approach to meet the needs of people in line with the local context in which they live, ensuring that our actions are relevant and meaningful to the communities we serve.
- 3.59 We have set out our Welsh Language Impact Assessment in Annex 1.

A1. Impact Assessments

- A1.1 Ofcom has an obligation to carry out [impact assessments](#) to provide our stakeholders with a view of the options considered in making policy decisions and showing why the chosen option was preferred. We recognise that the decisions we make can deliver significant value for citizens and consumers but can also impose significant costs on our stakeholders. We therefore consider if our policy interventions are proportionate and appropriate during our consultation process.
- A1.2 As reflected in Section 7 of the Communications Act, Ofcom must carry out impact assessments in cases where our conclusions would be likely to have a significant effect on businesses or the general public, or where there is a major change in Ofcom’s activities. In the case of our three-year media literacy strategy, we have not carried out an impact assessment as each project and work programme contained in the strategy are impact-assessed individually as appropriate.
- A1.3 Our equality impact assessment and Welsh language impact assessment are set out below.

Equality impact assessment

- A1.4 We have given careful consideration to whether our the strategy will have a particular impact on persons sharing protected characteristics (broadly including race, age, disability, sex, sexual orientation, gender reassignment, pregnancy and maternity, marriage and civil partnership and religion or belief in the UK and also dependents and political opinion in Northern Ireland), and in particular whether they may discriminate against such persons or impact on equality of opportunity or good relations. This assessment helps us comply with our duties under the Equality Act 2010 and the Northern Ireland Act 1998¹⁰.
- A1.5 When thinking about equality, we think more broadly than persons that share protected characteristics identified in equalities legislation and think about potential impacts on various groups of persons.
- A1.6 In particular, section 3(4) of the Communications Act also requires us to have regard to the needs and interests of specific groups of persons when performing our duties, as appear to us to be relevant in the circumstances. These include:
- > the vulnerability of children and of others whose circumstances appear to us to put them in need of special protection;
 - > the needs of persons with disabilities, older persons and persons on low incomes; and
 - > the different interests of persons in the different parts of the UK, of the different ethnic communities within the UK and of persons living in rural and in urban areas.
- A1.7 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.
- A1.8 We consider that the strategy is likely to have a particularly positive impact on communities experiencing financial disadvantage, older adults, children and people with learning disabilities and/or cognitive impairment compared to the general population and help advance equality of opportunity.

- A1.9 We know from our own and wider research that the need for media literacy support is widespread but that some groups, including communities experiencing financial disadvantage, are more likely to need media literacy support than others. Our media literacy strategy therefore aims to provide a universal offer, especially through our work with platforms and education systems, and in addition we will take an equitable approach: targeting communities likely to need more media literacy support through our People and Partnerships work and research.
- A1.10 In our targeted work, we will prioritise groups we know are more likely to need support with their media literacy including:
- > communities experiencing financial disadvantage
 - > older adults
 - > children
 - > people with learning disabilities and/or cognitive impairment.
- A1.11 Through delivery of our work with children, we aim to promote a child rights-based approach which will include consulting children on any work that affects them and upholding their rights, especially UNCRC article 17 (access to information from the media).
- A1.12 More generally, delivery of this media literacy strategy is likely to foster good relations because an underpinning principle of media literacy is respect for different opinions. For example, any work on news literacy recognises that bias is to be expected and is neither good nor bad, but something to be aware of.
- A1.13 There are groups more likely to experience discrimination, harassment or victimisation online including people living with a disability, LGBTQ+ communities, women and people with Black or minority ethnic backgrounds. Ofcom's wider online safety duties are intended to protect people online and are therefore relevant to our media literacy strategy. Where media literacy relates to digital identity and respecting others online, our work may focus directly on one group of people but have an intended indirect effect for another group. For example, our work on online misogyny is likely to directly target men and we hope will result in indirect positive outcomes for women as well as the men themselves.
- A1.14 We have not identified any adverse impacts on specific groups of persons that are likely to be affected in a different way to the general population. We do not anticipate that the media literacy strategy will directly or indirectly result in discrimination, harassment or victimisation of any groups.
- A1.15 We will continue to consider the impact on persons sharing protected characteristics for individual projects and work programmes contained in the strategy as appropriate and at relevant times.

Welsh impact assessment

- A1.16 The Welsh Language (Wales) Measure 2011 made the Welsh language an officially recognised language in Wales. This legislation also led to the establishment of the office of the Welsh Language Commissioner who regulates and monitors our work. 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)¹¹.

- A1.17 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.
- A1.18 The strategy, as set out in this document, aims to deliver improved media literacy outcomes. In our view, the implementation of these proposals would not have any adverse effects on the use and treatment of the Welsh language. We will continue to consider the Welsh language impacts of individual projects and work programmes contained in the strategy as appropriate and at relevant times.

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