

A Positive Vision for Media Literacy

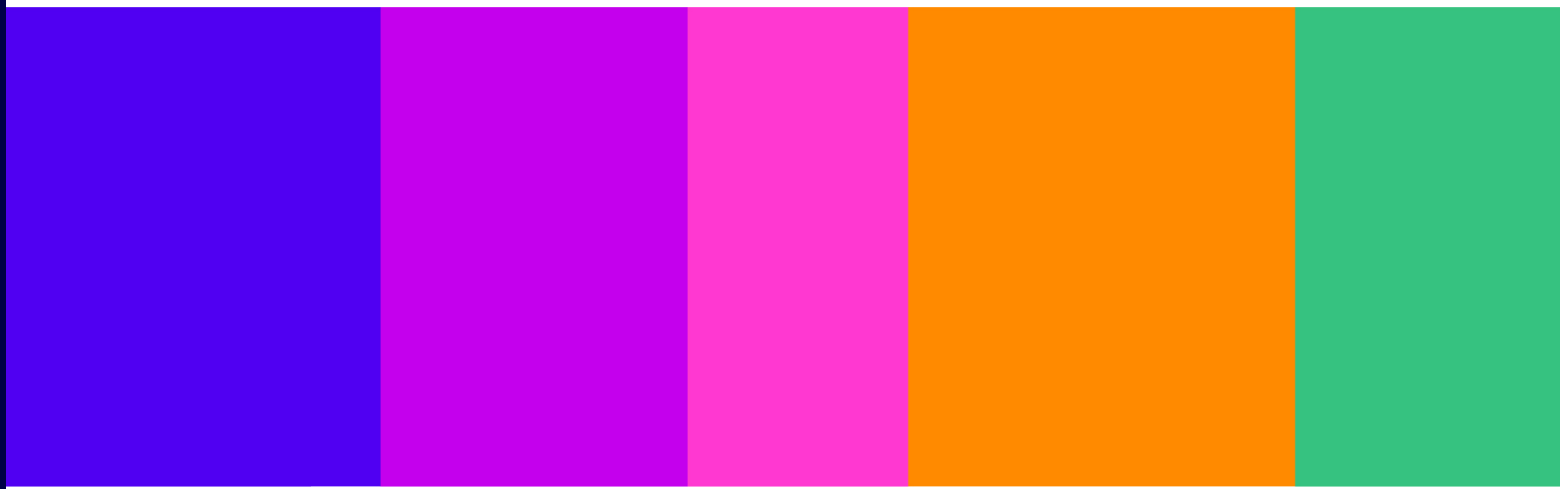
A consultation on Ofcom's Three-Year
Media Literacy Strategy

[Welsh version available](#)

Consultation

Published: 29 April 2024

Closing date for responses: 24 June 2024



Contents

Section

Foreword.....	3
1. Overview.....	4
2. Research, Evidence and Evaluation.....	8
3. Engaging Platforms.....	11
4. People and Partnerships	14

Annex

A1. Impact Assessments	18
A2. How to respond	21
A4. Consultation coversheet	24
A5. Consultation questions.....	25
A6. Other options considered but not prioritised for now	26
A7. Examples of our recent work	27
A8. Glossary	29

Foreword

Media literacy has been an important part of Ofcom’s role since it was established in 2003 when the Communications Act directed Ofcom to research and promote media literacy across the UK. However, this publication marks a significant milestone as Ofcom’s first public articulation of a multi-year media literacy strategy in 20 years.

Publication of this strategy is timely. Indeed, it is more important now than ever to think strategically about media literacy, given the dramatic changes in the landscape over the two decades since Ofcom started its work. Today, we live in a world of unprecedented media and communications abundance. News and entertainment flood our screens and devices continuously, platforms enable limitless social interactions, and the ability to navigate and evaluate online services critically is increasingly essential to our daily lives. Advancing media literacy is crucial to ensuring that people can navigate content safely and flourish online.

Of course, perspectives on how media literacy best achieves this goal can vary. Ofcom now defines media literacy as “the ability to use, understand and create media and communications across multiple formats and services”. Media literacy therefore has a foundational role to play in our overall mission to “make communications work for everyone”, and our priorities for people in the UK to access media they trust and value and to live a safer life online.

While Ofcom has an important role to play, media literacy must be the responsibility of everyone – online platforms in particular, but also parents, educators, third-sector organisations, providers of health and social care, professionals working with children, and others. To realise the full potential of media literacy in the UK, contributions and collaboration from all corners is essential.

The prize is clearly worthy of the collective effort. Imagine a UK where people possess the critical thinking skills to better spot mis and disinformation. Where people understand why they are being served certain types of content while controlling what they do and don’t see, knowing what is authentic when they do see it. Where old and young can easily and confidently communicate with their loved ones on different platforms. And where children can explore online more safely, cared for by adults who can help balance the benefits and risks.

I appreciate your engagement with Ofcom’s consultation and ask that as you consider your responses, you also reflect on the unique contributions that you and your organisation can make to support the advancement of media literacy across the UK.



Yih-Choung Teh

Group Director of Strategy and Research, Ofcom

1. Overview

- 1.1 Ofcom’s mission is to make communications work for everyone. Since its inception in 2003, researching and promoting media literacy has been an integral part of this mission.
- 1.2 In 2019, we reinvigorated our approach creating the **Making Sense of Media** programme, with an increased focus on online media. In December 2021, we published our [Approach to Media Literacy](#), which positioned Ofcom as a catalyst and convenor working with a range of stakeholders across the media literacy ecosystem. While Ofcom has previously published an annual plan regarding its activities in media literacy, this document represents Ofcom’s first three-year strategy.
- 1.3 The Online Safety Act 2023 (OSA) has clarified and added specificity to our media literacy duties in the 2003 Communications Act, including¹:

Build awareness

- Ofcom is to heighten public awareness and understanding of how people can protect themselves and others online.
- Ofcom is to focus on groups disproportionately affected by harm, including women and girls², and help users understand and reduce exposure to mis and disinformation.
- Ofcom has discretion on how to meet these duties (for example, pursuing activities and initiatives, or commissioning or taking steps to encourage others to do so) and how to prioritise different objectives.

Encourage technology and systems

- 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).
- Ofcom is to signpost users to resources, tools or information that can raise awareness about how to use regulated services to mitigate harms.

Publish a media literacy strategy and annual statement

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

- 1.4 Various definitions of media literacy exist, with Ofcom using “the ability to use, understand and create media and communications in a variety of contexts” for most of its 20-year history. However, given the increasing ways we are online and the complexity that brings,

¹ Section 166 of the Online Safety Act 2023.

² Importantly, different groups of women and girls are affected differently by online harm. Age, sexuality, gender identity, race and ethnicity, along with many other factors, intersect with gender to influence women and girls’ experiences online. For example, women and girls from minority ethnic backgrounds are more at risk of experiencing online harm and are twice as likely to believe that the risks of being online outweigh the benefits according to our Online Experiences Tracker research.

we are making a minor update to our definition of media literacy to “the ability to use, understand and create media and communications across **multiple formats and services**”.

- 1.5 These services are constantly evolving, playing a more influential role in virtually all aspects of our daily life while also introducing new risks, particularly relating to online safety and mis and disinformation. This underpins the importance of media literacy to Ofcom’s mission and particularly our strategic priorities: “media we trust and value” and “a safer life online”.
- 1.6 Given the scale and complexity of the challenges, as well as the potential opportunities, media literacy must be the responsibility of everyone – online platforms have a particular responsibility, but so do broadcasters and other service providers, as well as parents, educators, third-sector organisations, providers of health and social care, professionals working with children and others. To realise the full potential of media literacy in the UK, contributions and collaboration among all these actors is essential.
- 1.7 Ofcom has a valuable role as the broadcast media regulator and online safety regulator. Our strategy to improve media literacy starts with our existing regulatory levers. For example, as the broadcast media regulator, we uphold standards on air and ensure due accuracy and due impartiality in news and current affairs. We also work on ensuring media plurality so that people have access to a wide range of views from a variety of sources. Together this work supports one of the core components of media literacy: the ability to think critically about media and have access to different perspectives. This is a vital element of a media we trust and value.
- 1.8 Similarly, to help people live a safer life online, we have already made proposals to help ensure online services support their users to interact and engage with online content safely, with further work to come. For example:
 - Our [draft Illegal Harms Codes](#), which include proposals that promote media literacy and give users more control over their online experiences, including allowing them to be uncontactable, to block or mute other users and to disable comments. We have also made proposals to ensure that terms of service that prohibit illegal content are clear and accessible to users, so they know what is and is not allowed by different services, and that complaints systems are easy to find, access and use.
 - Guidance for [Video Sharing Platforms \(VSPs\)](#) on how to use media literacy to keep users safe, e.g., information for children about methods for reducing the risks of unknown contacts and harmful content³.
 - Next year, following completion of the Online Safety Act’s register of categorised services, we will set out our approach to duties on these services⁴ to empower users to choose what types of content they see, and to have clear Terms of Service that enable users to make informed choices about what services they want to use.

Our proposed strategy to fulfil our media literacy duties is to use our existing regulatory levers, supplemented by specific media literacy activities (overview set out in Figure 1 below). Our role as broadcast media regulator and online safety regulator is set out elsewhere, and so this media literacy strategy consultation will focus on Ofcom’s further activities as a catalyst and convenor to

³ See [Video-sharing platform guidance \(ofcom.org.uk\)](#), p. 49.

⁴ The term *categorised services* refers to services that fall within the scope of the Online Safety Act, which imposes legal requirements on user-to-user services, providers of search engines, and providers of internet services publishing or displaying pornographic content. The Act applies to UK service providers and services targeting the UK or with a significant number of UK users.

enable, and sometimes challenge, the broader ecosystem. Our strategy involves making choices about what we will do and what we will not do. In particular, we do not propose leading education programmes, for example, within schools; instead, consistent with acting as a catalyst, the strategy allocates some resource to promoting media literacy development among professionals who will then be better enabled to take forward that work.

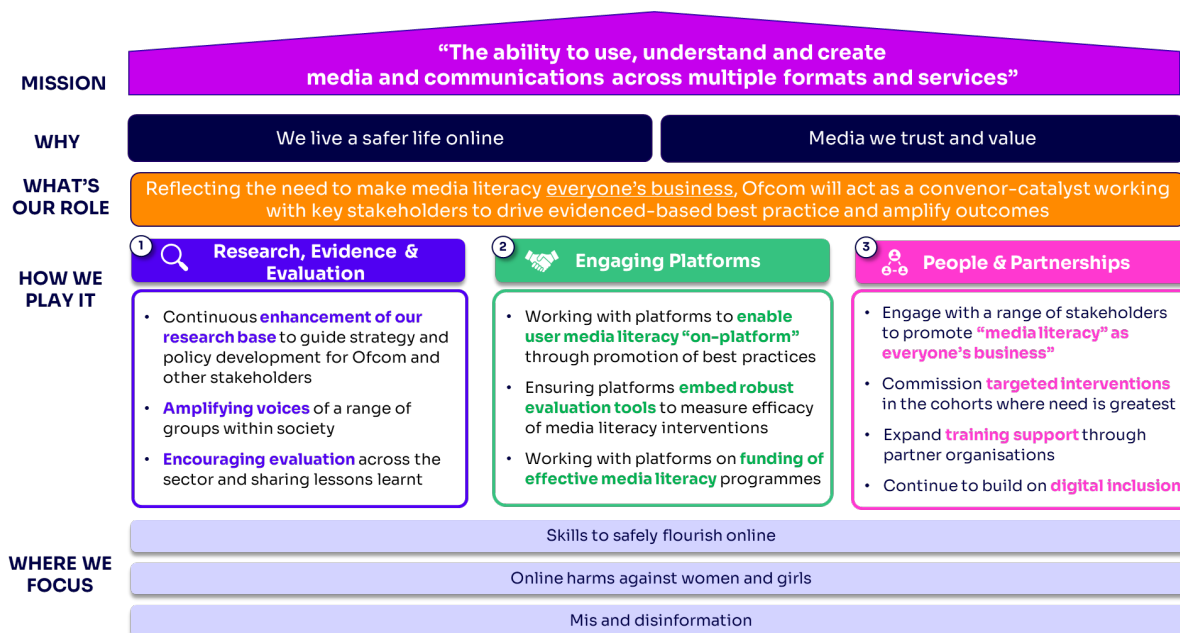


figure 1: Summary of Ofcom’s Media Literacy Strategy (2024 – 2027)

1.9 We have developed our proposed media literacy strategy prioritising 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.

1.10 The rationale for each element is as follows:

- **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 communications 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.

1.11 Media literacy is everyone’s business. This proposed strategy recognises that it is not Ofcom’s role to ‘do it all’ and we will be selective about what we prioritise over the next three years.

1.12 Throughout, we have sought to balance a universal media literacy offer with targeted support for those who need it most. Such groups include children, communities experiencing financial disadvantage and older adults. To ensure that delivery of our strategy is equitable and considers the experiences and perspectives of the groups we aim to support, we have undertaken an Equalities Impact Assessment (EIA) and considered children’s rights throughout. This will be an ongoing process as we deliver the strategy.

- 1.13 The challenges are significant, and successful execution of the media literacy strategy will require the coordination, collaboration and contributions of a myriad of stakeholders across the UK. We believe the near-term opportunities and potential future rewards are worthy of this effort.

Reviewing and responding to the strategy

- 1.14 We have included a glossary explaining key terms used throughout this document. The glossary can be found in Annex 8.
- 1.15 You will find questions that we are seeking responses to throughout the document and the ways you can do that are set out in Annex 1 “Responding to this Consultation”.
- 1.16 The consultation runs for eight weeks from publication on 29 April 2024 until 24 June 2024 which is the deadline for responses. We will carefully consider all the responses received over that time and publish our final strategy in the Autumn. You can give us your views in a variety of ways:
- Complete the consultation form.
 - Attend a virtual session, 23 May 2024, [here](#).
 - Attend our in-person events.
 - > Edinburgh, 10 June 2024, [here](#).
 - > Belfast, 11 June 2024, [here](#).
 - > London, 13 June 2024, [here](#).
 - > Cardiff, 14 June 2024, [here](#).

2. Research, Evidence and Evaluation

Outcomes: By 2027, there will be better understanding and measurement of media literacy, due to stakeholders using our research evidence for their policy development and activities. By 2027, there will be a deeper understanding of ‘what works’ for the delivery of media literacy interventions in relevant sectors.

- 2.1 Our longstanding quantitative research into the media use and attitudes of adults and children in the UK, as well as our longitudinal Media Lives qualitative reports, provide useful evidence on the critical evaluation skills and online knowledge and understanding among internet users in the UK.
- 2.2 We conduct research that provides in-depth insight on particular topics, such as our report into [minority beliefs](#). We also take an action research approach in the delivery of our media literacy activities, learning from our work with communities in real time and publishing evaluation reports to encourage a focus on what works.
- 2.3 Our work with third-sector organisations delivering media literacy initiatives helps them carry out specialist reporting that demonstrates how well their projects went – including how effective they were at improving people’s media literacy. This reporting, often required by funders, is known as evaluation. We have created a suite of resources supplemented by workshops to build capacity within organisations with little experience of evaluation.
- 2.4 We will boost our evaluation toolkit to further empower those running media literacy programmes to evaluate their own projects and use and share those findings to support the delivery of more effective initiatives in the future.

Our goals and how we will get there

- 2.5 To expand the breadth and depth of our insight into online and media use in the context of daily life and support the sector in understanding ‘what works’ for the delivery of media literacy initiatives we will:

GOAL ONE: Continue to use our research to inform our policy development and media literacy interventions, and to encourage its use and further analysis by stakeholders.

- 2.6 We will achieve this primarily through the following proposed key activities:
 - Identifying key impact measures from our datasets to help ourselves and our stakeholders monitor ‘what works’. We will ensure that we assess changes in media literacy over time, using a range of core measures.
 - We will use an increased range of robust and innovative methods to gain insights into priority topics including:
 - > A better understanding of how we can help vulnerable cohorts navigate the challenges of mis and disinformation. For example, this year we propose to test

what messages might work best, and from whom those messages come, to be most appropriate for the relevant audience.

- > Exploring why users engage in the perpetration of harmful activity which disproportionately affects women and girls⁵, drawing out media literacy implications about how they understand their actions and their impact online. Understanding how people get drawn into communities that propagate and promote discriminatory views against women and girls, and understanding how and where these views can be found, is an important first step.
- > Finding ways to increase users' understanding of where and how their personal information is used by social media platforms and other online services. Our previous [Day in the Life qualitative research](#) has illustrated how users' understanding of the ways in which platforms use their data is often limited, so we propose to provide evidence of how platforms might address this media literacy gap in order to inform platform best practice.
- > Exploring the insights from our current project with first-time voters. This work is focused on content of democratic importance, looking at exposure to mis and disinformation and generative AI, in an election year. We propose to share those findings widely with interested stakeholders to ensure the insights can inform relevant work.

GOAL TWO: Amplify the voices and testimony of a range of groups within society so that our research is useful to as many people and organisations as possible.

2.7 We will achieve this primarily through the following proposed key activities:

- Boosting our tracker samples to enable us to listen to different user groups, including those who are disproportionately affected by harmful content and activity, and conduct secondary analysis to gain a deeper understanding of different audiences, including women and girls, and children.
- Sharing our understanding of how the issues we address in our research programme make an impact on a range of demographic and geographic groups, particularly targeting protected characteristics.

GOAL THREE: Share our knowledge on 'what works' in media literacy delivery.

2.8 We will achieve this primarily through the following proposed key activities:

- Publishing the findings from our commissioned media literacy activities outlined in the People and Partnerships section of this strategy.
- Providing tools and guidance to better equip organisations delivering media literacy interventions to teach critical skills that help people identify mis and disinformation. This could be in the form of a toolkit and workshops which we would design, deliver and evaluate over the duration of the three-year strategy.

⁵ This includes online misogyny as well as other forms of online gender-based violence and abuse ("OGBVA"). We currently use this term to refer to a wide range of online content and activity which disproportionately affects women and girls, including by enacting or reinforcing misogyny, sexism and other forms of gender-based harm. This term is widely used in the United Kingdom, however, we recognise there are other terms used, for example online violence against women and girls (VAWG) and tech-facilitated gender-based violence (TFGBV).

- Working with Ofcom’s specialist teams, exploring how to best signpost potential technology solutions (such as watermarking or third-party plug-ins such as NewsGuard) in our suite of resources.

GOAL FOUR: Support providers of media literacy initiatives to carry out evaluation, leading to a culture where best-practice approaches are developed, shared and used to develop more effective interventions.

2.9 We will achieve this primarily through the following proposed key activities:

- Offering training and resources that equip professionals delivering media literacy interventions with knowledge and skills related to the evaluation process.
- Creating a framework of agreed and associated indicators of success for our own work and reporting against those.
- Requiring organisations we commission to provide impact and process evaluations which are proportionate to the scale of delivery and contract.

Indicators of success

2.10 We believe in being transparent about what we have achieved in relation to our strategic goals for Research, Evidence and Evaluation and will include the following indicators when measuring and reporting our progress:

- Our media literacy research continues to be highly regarded and cited by the media literacy community, media and governments in the UK and internationally in relation to policy development and media literacy interventions.
- We have an expanded network of research partners and stakeholders nationally and internationally.
- More organisations delivering media literacy interventions conduct impact evaluations and share best-practice approaches.

What’s different?

2.11 We highlight the following four key differences running through our strategic approach to Research, Evidence and Evaluation:

- Changes to sample sizes allowing more detailed analysis of different groups.
- A particular focus on the media literacy areas outlined in the OSA.
- Increased liaison with a range of sectors for media literacy interventions and evaluation.
- Increased outreach and embedding of our work to stakeholders and the wider public.

Question 1: Do you agree with our proposals in this section? Please explain your reasons and provide any relevant supporting evidence.

3. Engaging Platforms

Outcome: By 2027, online services will provide better media literacy support for their users, more evaluation of the impact of this support, and longer-term funding for initiatives that help provide this support.

- 3.1 Online platforms and services have an important role to play in promoting media literacy to the millions of people that use their services. Ofcom's regulatory responsibilities for online safety and its media literacy role are interrelated with the opportunity to complement one another. We may consider further including media literacy as part of measures in our online safety codes of practice.
- 3.2 We will 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 expect our media literacy work to be broader in scope and to focus more on best practice, which may go significantly further than the compliance requirements of the services' online safety duties.
- 3.3 What users experience online 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. Research commissioned by Ofcom speaks to the efficacy and impact of such interventions on platforms to promote media literacy.
- 3.4 However, to do this consistently and well, 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.
- 3.5 We also recognise the efforts of online services in developing and/or funding third party media literacy projects, as these act as an essential complement to what happens on the platform. However, organisations that are funded by platforms and delivering media literacy initiatives or resources face a number of challenges that limit their full potential. These include fragile and short-term funding agreements, a constant pressure for 'new' content, and potentially selective or partial content created to suit brand values rather than user needs.

Our goals and how we will get there

- 3.6 Our work with platforms is to provide evidence-based recommendations to encourage online services to develop robust and thorough media literacy interventions that focus on what happens online, in the moment, but also offline. We propose:

GOAL ONE: Build on work prioritising users' media literacy on platform by promoting best practice.

- 3.7 We will achieve this primarily through the following proposed key activities:
 - Working with online services to encourage them to adopt our Best Practice Principles for Media Literacy by Design.

- Building collective understanding of what users consider helpful to better navigate the online environment and to foster more positive experiences online. In particular, we are interested in understanding how platforms can best support users by providing information at different points in the user journey, including providing context on the content they see online. We will look at the following specific issues:
 - > Mis and disinformation.
 - > Harmful content and activity that disproportionately affects women and girls.
 - > Protection of personal information.
 - > Content of democratic importance.
- Continuing to build collective understanding on what users expect from online services to make the online environment better and more positive. We will look at specific issues such as the impact on children of ‘persuasive design’, including functionalities like autoplay and infinite scrolling. This impact could be positive or may contribute to harms. We will consider how services can help users make informed choices and mitigate potential harms by supporting the media literacy of their users.
- Turning 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’ expectations⁶.

GOAL TWO: Ensure that platforms embed evaluation to build understanding of what works to promote media literacy.

3.8 We will achieve this primarily through the following proposed key activities:

- Encouraging platforms to evaluate the impact of their interventions and share what works with other stakeholders to foster a culture of shared learnings. We will exercise our influence to celebrate online services demonstrating leadership. We will also set out where we think platforms could be doing more.

GOAL THREE: Work to ensure platforms’ funding of media literacy programmes.

3.9 We will achieve this primarily through the following proposed key activities:

- Encouraging online services to promote, support and fund, either directly or indirectly, media literacy skills development for their users and others.
- Exploring the option of building a consensus on best practice principles for media literacy delivery.
- Encouraging online services to fund third-party interventions direct to users in a range of settings (for example, Google’s collaboration with Parent Zone to create ‘Be Internet Legends’ – a media literacy programme aimed at 7- to 11-year-olds that consists of live assemblies, a teaching pack, teaching resources and support for parents) and push their ambition to serve under-served groups. There are positive aspects to platforms funding

⁶ Our [recent research](#) using an eye-tracking methodology quantified the extent to which content placed on a feed has a material impact on open rates and engagement. We found that news items at the top of the feed received around 14 times more total attention time compared to news items placed at the bottom of the feed. Acting on these insights to promote users’ media literacy - either for news impartiality or indeed features or apps that provide context around content or signpost to settings - could make for a more media literate user base.

media literacy initiatives – the creativity, the interest and innovation that this option offers are to be welcomed. However, there may also be some potential drawbacks which could include:

- > Partial content designed to focus on selected features of the service.
- > Service only offered in selected areas which may compound inequalities.
- > A misleading perception that media literacy skills can be developed through a ‘one and done’ approach.

Indicators of success

3.10 We believe in being transparent about what we have achieved in relation to our strategic goals for Engaging Platforms and will include the following indicators when measuring and reporting our progress:

- Online services measure the impact of their interventions on-platform and share their learnings.
- Best-practice principles for media literacy initiatives are implemented by organisations delivering programmes.
- Platforms’ funding models relating to media literacy interventions delivered by third-party organisations evolve to focus on impact, and investments are multi-year.

What is different?

3.11 We highlight the following four key differences running through our strategic approach to Engaging Platforms:

- Our focus on users’ expectations of platforms informs all of our work.
- Our commitment to commissioning research to better understand what users expect from platforms and consider helpful to contextualise the content they see online.
- Our work encouraging platforms to measure the impact of their interventions.
- Our approach to fostering a culture where sharing learnings is standard practice.

Question 2: Do you agree with our proposals in this section for working with platforms? Please explain your reasons and provide any relevant supporting evidence.

4. People and Partnerships

Outcome: By 2027, more people will have access to the skills and support they require to navigate content and safely flourish online, and educators and other priority workforces will be better enabled to deliver media literacy skills. By 2027, media literacy will be a greater priority for a broader range of organisations and sectors.

- 4.1 Ofcom has long recognised the need for individuals, families and communities to have media literacy skills. Our research dispels any myths that younger people (sometimes referred to as ‘digital natives’) simply understand all facets of being online and possess the necessary skills and behaviours to navigate it confidently and knowledgeably.
- 4.2 Our experience and insights suggest that media literacy interventions are most effective when they are delivered by trusted voices. In addition to the professionals that an individual already trusts to support them, this could be someone from the same community or with similar life experiences as the participants. Our experience has been that while this approach is effective it usually requires a substantial resource investment.
- 4.3 We are taking an equitable approach to delivery, focusing our resources on those who have particular media literacy needs, for example communities experiencing financial disadvantage, older people and children. We recognise that not all people with these characteristics will struggle with their media literacy, however this approach will help us to target our work and resources where they are likely to have the greatest impact.
- 4.4 Our work with children will take a child rights-based approach so that, in planning and undertaking work, we will consider the possible direct and indirect impacts on children. In particular, our work supports article 17 of the United Nations Convention on the Rights of the Child (UNCRC) (access to information from a variety of media sources). We will ensure that any work targeting children takes their views into account.
- 4.5 Children with particular characteristics are more likely to need support with their media literacy skills and we therefore propose to prioritise initiatives for children with special educational needs and disabilities, communication difficulties, experience of care, mental health difficulties and/or physical impairments.
- 4.6 We will apply this equitable approach across each of the topics our work tackles, including mis and disinformation and harmful content and activity that disproportionately affects women and girls. Where media literacy relates to digital identity and respecting others online, our work may focus directly on one group of children but have an intended indirect effect for another group of children. For example, our work on online misogyny is likely to directly target teenage boys and young men and we hope will result in positive outcomes for girls and young women as well as the young men themselves.
- 4.7 People and partnerships are at the heart of our approach. We are committed to convening media literacy practitioners and others working in related areas or with key communities, creating opportunities for them to share expertise and learn from others. We achieve this through events for our network of individuals and organisations with a shared interest in media literacy, and through our Advisory Panel and working groups. We also forge partnerships with third-sector organisations, local authorities and other bodies through our

work building on digital inclusion infrastructure, and through our programme commissioning pilot projects for underserved communities.

- 4.8 We also recognise the benefits and opportunities of engaging with international stakeholders to learn and share insights for mutual benefit and to understand more quickly what works and what doesn't.

Our goals and how we will get there.

- 4.9 We believe that media literacy should be everyone's business. To get there we propose:

GOAL ONE: Commission targeted interventions in the cohorts where the need is greatest and share best practice with the sector.

- 4.10 We will achieve this primarily through the following proposed key activities:

- Using our research to identify key audiences and geographic areas where proposed interventions will have the most impact.
- Identifying topics, drawing on our evidence base, to cover in proposed interventions including:
 - > Understanding how to identify and protect against mis and disinformation.
 - > Mitigating misogynistic and sexist behaviours online.
 - > Understanding how to identify content of democratic importance.
 - > Equipping people with the skills and knowledge to protect their personal information.
- Commissioning organisations who are experts in working with the target cohort/s.
- Sharing insights and lessons learned from these interventions with the wider sector through our networks.

GOAL TWO: Expand our training offer through partner organisations delivering continuing professional development (CPD) courses.

- 4.11 We will achieve this primarily through the following proposed key activities:

- Expanding our existing programme of work in which we commissioned expert providers to deliver training for professionals working with children and young people across three sectors: teachers and education professionals, children's mental health professionals and children's social care providers. We propose to:
 - > Work with Initial Teacher Training providers (universities etc.) to harness the knowledge of new teachers.
 - > Work with education departments and regulators in each UK nation to support them to develop media literacy practice in schools (e.g., establish a media literacy 'lead' in schools).
- Evaluating the impact of the training and signposting participants on to further resources

GOAL THREE: Continue to build on the digital inclusion infrastructure, so that those new to technology can start and continue well.

4.12 We will achieve this primarily through the following proposed key activities:

- Developing 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. This work is conducted in areas of financial disadvantage. We propose to:
 - > Work with relevant government departments and consortia across the UK to influence policy and funding models.
 - > Hear from other areas who would be interested in understanding our approach and what we have learnt.
 - > Expand to a fourth community in Northern Ireland.
 - > Partner with digital inclusion experts to add media literacy into their offering.

GOAL FOUR: Forge new relationships and expand our network to make media literacy a priority for a wider range of organisations.

4.13 We will achieve this primarily through the following proposed key activities:

- Forming relationships with organisations who have trusted relationships with communities who are either not very active online or more likely to inhabit a hostile environment online, for example:
 - > Organic communities created by and for women and girls. These communities may support others online, tackle online misogyny, or offer support to women and girls who have experienced online gender-based violence and abuse. We would also be keen to amplify the work already being done in these communities.
- Exploring how public service broadcasters might address media literacy considerations.
- Building a broad coalition of organisations working in the third sector. This could be in areas adjacent to media literacy who may be delivering media literacy 'by stealth' (for example, through programmes focused on community cohesion or health). This would also include organisations working with parents.
- Partnering with expert organisations. This could be in the form of a matchmaking service run by Ofcom to link up experts in mitigating mis and disinformation with practitioners who do not have in-depth knowledge. It could also be a service where experts skilled in having discussions with audiences with minority beliefs share best practice approaches to challenging conversations.
- Considering LSE's recent suggestion of a national Media Literacy Week as expressed in its [report for the Department of Science, Innovation and Technology \(DSIT\)](#). We are open-minded on whether a media literacy week would be a useful activity for the UK and, if so, whether Ofcom should coordinate it. One of the key insights that would help us in making that decision is whether there is evidence of effectiveness from focus weeks such as this.

GOAL FIVE: Build on our role as a convener of media literacy experts to co-create policy and practical recommendations.

4.14 We will achieve this primarily through the following proposed key activities:

- Examining future technology trends and their media literacy implications, convening relevant sector policy actors and in-house and external technological expertise. 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 future and emerging technologies. We will do this by:

- > Setting up a future technology trend ad-hoc working group of experts from the media literacy sector and beyond who will identify the media literacy opportunities and challenges related to key elements of life online and explore how emerging and future technology may influence users' experience.
- > The group will develop and publish policy and programme recommendations to encourage the sector to integrate these into their work.

Indicators of success:

4.15 We believe in being transparent about what we have achieved in relation to our strategic goals for People and Partnerships and will include the following indicators when measuring and reporting our progress:

- Inclusion of media literacy in local digital strategies with a goal of 10 local digital inclusion strategies including media literacy across the UK over three years.
- Measurable media literacy impact of commissioned media literacy activities.
- Ofcom develops partnerships with key organisations engaged in media literacy.
- The Making Sense of Media (MSOM) network grows and includes representatives from delivery organisations adjacent to media literacy and those representing vulnerable cohorts.
- Number of professionals trained through our 'train the trainer' initiatives and improved participant confidence compared with baseline surveys.

What is different?

4.16 We highlight the following four key differences that run through our strategic approach to People and Partnerships:

- Increased focus on building media literacy – through our network and interventions – in areas of need.
- Commitment to supporting media literacy skills for children through our training offer.
- Renewed focus on broadening our work with partner organisations to create as wide a coalition as possible working towards a shared goal.
- Emphasis on co-creation with media literacy experts to devise practical policy recommendations.

Question 3: Do you agree with our proposals in this section? Please explain your reasons and provide any supporting evidence. We are particularly interested in any views and evidence about whether a Media Literacy Week would be impactful.

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 proposal 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 1998⁷.
- 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:
- a) the vulnerability of children and of others whose circumstances appear to us to put them in need of special protection;
 - b) the needs of persons with disabilities, older persons and persons on low incomes; and
 - c) 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

⁷ Further detail is set out in section 149 of the Equality Act 2010 and section 75 of the Northern Ireland Act 1998.

principal duty of furthering the interests of citizens and consumers, regardless of their background and identity.

- A1.8 We consider that our proposals are 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)⁸.
- 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 Our proposals, as set out in this document, aim 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.

Question 4: Do you agree with our assessment of the potential impact on specific groups of persons?

Question 5: Do you agree with our assessment of the potential impact of our proposals on the Welsh language?

⁸ See Standards 84 – 89 of [Hysbysiad cydymffurfio](#) (in Welsh) and [compliance notice](#) (in English). Section 7 of the Welsh Language Commissioner’s [Good Practice Advice Document](#) provides further advice and information on how bodies must comply with the Welsh Language Standards.

A2. How to respond

Ofcom would like to receive views and comments on the issues raised in this document by 5pm on 24 June 2024.

You can download a response form from [Consultation: Ofcom's three-year Media Literacy strategy](#). You can return this by email or post to the address provided in the response form.

If your response is a large file, or has supporting charts, tables or other data, please email it to MSOMConsultation@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 24 June 2024.

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

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.

We will publish a transcript of any audio or video responses we receive (unless your response is confidential)

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.

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.

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 5](#). 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.

If you want to discuss the issues and questions raised in this consultation, please email MSOMConsultation@ofcom.org.uk.

Confidentiality

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.

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.

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.

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.

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

Following this consultation period, Ofcom plans to publish a statement in October 2024.

If you wish, you can register to receive mail updates alerting you to new Ofcom publications.

Ofcom's consultation processes

Ofcom aims to make responding to a consultation as easy as possible. For more information, please see our consultation principles in Annex 3.

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.

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

A3. Consultation principles

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

Before the consultation

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

We will be clear about whom we are consulting, why, on what questions and for how long.

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.

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.

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.

If we are not able to follow any of these seven principles, we will explain why.

After the consultation

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.

A4. 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)

A5. Consultation questions

- **Question 1**: Do you agree with our proposals in this section? Please explain your reasons and provide any relevant supporting evidence.
- **Question 2**: Do you agree with our proposals in this section for working with platforms? Please explain your reasons and provide any relevant supporting evidence.
- **Question 3**: Do you agree with our proposals in this section? Please explain your reasons and provide any relevant supporting evidence. We are particularly interested in any views and evidence about whether a Media Literacy Week would be impactful.
- **Question 4**: Do you agree with our assessment of the potential impact on specific groups of persons?
- **Question 5**: Do you agree with our assessment of the potential impact of our proposals on the Welsh language?

A6. Other options considered but not prioritised for now

- A6.1 Developing an effective strategy requires considering options and being reflective in what we will and will not do. We felt it useful for stakeholders, in considering our strategy, to understand the alternative approaches we considered.

Taking a research-only approach:

- A6.2 We considered the option of fulfilling our media literacy duties solely or primarily through the provision of research. In doing so we would continue to support the wide range of organisations conducting media literacy activities in the UK. In this way, Ofcom would have facilitated such organisations and initiatives through the provision of assured evidence and insight into how people's lives were changing, what their media literacy needs were, and what was proving effective in helping people.
- A6.3 However, we consider that taking an evidence-only approach would be undesirable, not least as Ofcom's duties require us to take broader action than exclusively research provision. More substantively, Ofcom provides an important role acting as a non-commercial, neutral organisation that can provide trusted media literacy insight and engagement.

Pursuing a mass-media communications campaign approach:

- A6.4 A second option was commissioning a UK-wide public campaign(s) on various media literacy issues aimed at encouraging behavioural change.
- A6.5 We do not consider that this type of broad campaign approach would be consistent with our core skill sets or indeed aligned with the resources and time horizon of our planning period.

Reframing our media literacy duties on online safety:

- A6.6 A third option that we considered was to only focus our media literacy work on online safety matters. A rationale for such an option would be that focussing initiatives in this way could perhaps lead to greater impact.
- A6.7 However, such an option would fail to meet our media literacy duties. Media literacy is connected to, but more than, online safety. A safety-only focus would also miss out on societal benefits such as creativity and democratic participation. In addition, given there are many people who do not regularly, or at all, use online services, such an approach would not tackle digital exclusion and may even exacerbate it.

A7. Examples of our recent work

This table is a small illustrative sample of projects that we and a range of partners have commissioned or conducted over the last 12 months. It is necessarily selective and has been curated to provide an overview of the breadth of our work.

Project and Approach	Activities and Impact
Encouraging the largest online platforms to demonstrate a commitment to promoting the media literacy of their users through platform design and supporting media literacy initiatives for their communities.	Created, published, consulted on and finalised the Best Practice Principles for Media Literacy By Design , with the active engagement and support of platforms and an external working group .
Communities with the most significant need are well served by more effective interventions.	<p>Commissioned 13 local organisations to enhance the media literacy skills of their communities through pilot projects. We worked with them to understand their specific needs and commissioned work to address those needs. Recognised internationally with UNESCO award.</p> <p>Innovative solutions included:</p> <p>Red Chair Highland – older adults:</p> <ul style="list-style-type: none"> • Rural communities – ‘I can’t believe you came here.’ • Local collaboration e.g., with food banks, focused on digital inclusion. <p>Salford Foundation – children and young people:</p> <ul style="list-style-type: none"> • Working with boys on online misogyny through rugby clubs. <p>The Brain Charity – young people with neurological conditions and their parents/carers:</p> <ul style="list-style-type: none"> • Focus on online misogyny in neurodivergent communities.
Evaluation is embedded in media literacy programme delivery.	<p>Trained 155 representatives from third sector organisations and other media literacy experts (UK and international) in evaluation via seven online workshops.</p> <p>Shared expert evaluation of grassroots media literacy interventions via expert speaker sessions at:</p> <ul style="list-style-type: none"> • European digital and media literacy conference. • EDMO evaluation working group. • EMIL working group (EPRA). • Meta’s EU digital citizenship working group. <p>Influenced French media literacy policy (Ofcom evaluation toolkit adopted by the French regulator ARCOM and translated into French).</p>
Research and insights are shared and used within the media literacy sector and beyond.	We have published a wealth of research and have shared it nationally and internationally. A sample of our research reports are:

	<ul style="list-style-type: none"> • Understanding experiences of minority beliefs online. • Exploring high media literacy among adults and children aged 13+ and 8-12s. • Media literacy, immersive technology and the future. • Adults' media literacy research annual reports. • Children's media literacy research annual reports.
<p>Engagement programme - to share expertise and build a common understanding of what works in media literacy.</p>	<ul style="list-style-type: none"> • Grown MSOM network membership by 50 per cent over three years (from 290 members in October 2020 to 590 members in April 2024). 117 stakeholders attended four events in the four nations in June 2023. • 120 stakeholders attended our December 2023 conference in London. • Collaboration with MSOM Advisory Panel and working groups.

A8. Glossary

Many different terms are used when discussing media literacy. We have defined some which are used in this document. It is important to note that there is sometimes overlap in the way that terms are used.

Action research

This is a research method that simultaneously investigates a practice – such as a way of delivering a course of media literacy workshops - as the practice itself is carried out, to improve the methods and approach of those involved.

Baseline

When carrying out an evaluation, a baseline is the starting point against which to measure change. This could be the participants' existing level of knowledge about a topic or their existing level of skills.

Data

In the context of media literacy research and evaluation, data refers to information about participants and their experiences. It could be measurements, observations, survey responses, transcripts of interviews or feedback from participants. It can be qualitative (narrative) or quantitative (numerical). Data can be analysed and used to better understand usage, attitudes and experiences of participants, or to assess an intervention in terms of its outcome and its impact.

Evaluation

In the context of our work, we understand evaluation as specialist reporting that demonstrates how well a media literacy intervention went – including how effective it was at improving people's media literacy.

Impact

Impact in the context of evaluation for media literacy interventions refers to longer-term change at an individual or societal level that can be attributed to the outcomes of an intervention. Impact is the cumulative result of achieved outcomes. For example, the impact of a media literacy project could be:

- a change in the way that participants consume news.
- an increase in the creativity of the audience regarding online media.
- increased resilience to disinformation.

Impact evaluation

Impact evaluation will focus on what the project achieved in terms of change for the target audience and/or wider society, and whether intended outcomes were achieved.

Indicators

Impact indicators and outcome indicators are the measurable pieces of evidence that allow you to track the changes that have taken place as a result of a programme or work or project.

Intervention

Intentional action to promote media literacy; this could range from a programme of workshops on media literacy delivered by a third-sector organisation, to a suite of accessible resources (such as a lesson plan or how-to guides) posted on a website, to a pop-up on a social media platform with information about content the user is seeing.

Longitudinal data

In the context of media literacy, longitudinal data is evidence collected over a period of time; for example, by asking the same questions. It allows you to track change in responses to those questions over time. It can be qualitative (narrative) or quantitative (numerical).

Outcome

An outcome is the change that happens as a result of an activity or programme of work. It is usually finite and measurable.

Persuasive designs

Persuasive designs aim at changing the attitudes or behaviours of users. Online services are often characterised as persuasive technologies as they are designed to influence users' decision-making.

Process evaluation

Process evaluations will focus on asking how you delivered your project, how far the way in which the project was delivered affected the final outcomes and how you might approach delivery differently in the future.

Qualitative data

Qualitative data is information that can't be counted: it is descriptive, and often for a media literacy initiative or research it will be narratives or quotes from participants. It is usually collected through interviews, focus groups, observations, case studies or open-ended survey questions. It 'gives voice to experience' and can be used to understand how people think or feel about something, and why they think or feel that way. It can be combined with quantitative data for deeper understanding.

Quantitative data

Quantitative data is information that can be counted. In the context of media literacy, it is usually collected through surveys. It can be used to understand what people think about something (from a limited range of options), and whether something has changed in their attitudes. Quantitative data can be gathered over time to produce longitudinal evidence. It can be combined with qualitative data for deeper understanding.

Tracking Surveys/Trackers

Tracking Surveys or trackers are surveys that are repeated at intervals over a period of time, in order to measure changes and trends.