

## Consultation response form

Please complete this form in full and return to [makingsenseofmedia@ofcom.org.uk](mailto:makingsenseofmedia@ofcom.org.uk).

<b>Consultation title</b>	Media literacy by design - Best practice principles for on-platform interventions to promote media literacy
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<b>Representing (delete as appropriate)</b>	Organisation
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## Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

<b>Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.</b>	Nothing
<b>Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.</b>	None
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	N/A

## Your response

Question	Your response
<p><b>Question 1:</b> We include labels, overlays, pop-ups, notifications, and resources as examples of on-platform interventions (additional information regarding this typology can be found in the Annex on page 3).</p> <p>(a) Do you agree with this categorisation of on-platform interventions?</p> <p>(b) If not, please explain.</p>	<p>Confidential? – Y / N</p>
<p><b>Question 2:</b> Do you have any feedback on the summary of themes we identified from online services? Are there any omissions or other items you think important to add?</p>	<p>Confidential? – Y / N</p>
<p><b>Question 3:</b> Are we missing anything with the three headings used to structure the best practice principles for media literacy by design?</p>	<p>Confidential? – Y / N</p>
<p><b>Question 4:</b> Which aspects of the proposed best practice principles for media literacy by design work well, and why? Which aspects don't work so well, and why? Do you have any comments on the specific principles (please specify if providing feedback on individual principles)?</p>	<p>Confidential? – Y / N</p> <p>The main point we would like to make from our perspective – working at the centre of a large coalition of organisations with an interest in the successful implementation of the Online Safety Act - is a joining-up/structural one on the first principle (page 7). This principle suggests online services create a “media literacy by design” policy and that media literacy is a "strategic priority in and of itself". However, looking in detail at the recent Online Safety Act illegal harms consultation, published by Ofcom on 9 November 2023, (eg volume 4) there are very few mentions of media literacy, except at para 20.117 re user verification helping users distinguish between real and fake accounts. Should Ofcom not be</p>

	<p>using this opportunity to work “media literacy by design” into the OSA codes of practice?</p> <p>Disinformation is mentioned re impersonation (eg with regard to fraud) and in the context of the new foreign interference offence, so we would advise that there is a space for some mitigating measures relating to media literacy here that would apply alongside the content moderation/takedown measures that are otherwise central to the codes.</p> <p>If a judgement has been made that media literacy is not relevant to the codes relating to these duties – eg because they deal with illegal content so therefore media literacy is not relevant as to whether users can critically evaluate such content because the onus is on platforms stopping it being seen in the first place – then can Ofcom confirm that a different approach will be taken with the children’s duties? Arguably media literacy measures will be even more important to protecting children not just from the illegal offences but from “legal” but harmful material, such as disinformation.</p>
<b>Question 5:</b> Do you have any further guidance/feedback to offer on how platforms can enact best practice media literacy by design?	Confidential? – Y / N
<b>Question 6:</b> Can you submit any case studies or examples of different services enacting any of these best principles for media literacy by design? Can you provide any other examples of best practice media literacy by design that may not be covered by this document?	Confidential? – Y / N

<p><b>Question 7:</b> How do you expect in-scope services to demonstrate that they have adopted the principles? What would this look like?</p>	<p>Confidential? – Y / N</p>
<p><b>Question 8:</b> What more can be done to encourage services to promote media literacy by design?</p>	<p>Confidential? – Y / N</p>
<p><b>Question 9:</b> How do you envisage the proposed services in scope of this work, and in particular their design elements as they relate to the promotion of media literacy, changing and evolving within the next 5-10 years?</p>	<p>Confidential? – Y / N</p>

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