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# A Positive Vision for Media Literacy: A consultation on Ofcom's Three-Year Media Literacy Strategy

## About us

Consumer Scotland is the statutory body for consumers in Scotland. Established by the Consumer Scotland Act 2020, we are accountable to the Scottish Parliament. The Act defines consumers as individuals and small businesses that purchase, use or receive in Scotland goods or services supplied by a business, profession, not for profit enterprise, or public body.

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**consumer.scot**

Our purpose is to improve outcomes for current and future consumers, and our strategic objectives are:

- to enhance understanding and awareness of consumer issues by strengthening the evidence base
- to serve the needs and aspirations of current and future consumers by inspiring and influencing the public, private and third sectors
- to enable the active participation of consumers in a fairer economy by improving access to information and support

Consumer Scotland uses data, research and analysis to inform our work on the key issues facing consumers in Scotland. In conjunction with that evidence base we seek a consumer perspective through the application of the consumer principles of access, choice, safety, information, fairness, representation, sustainability and redress.

## Consumer principles

If relevant, use this space to explain which consumer principles are engaged by the consultation response e.g.

The Consumer Principles are a set of principles developed by consumer organisations in the UK and overseas.

Consumer Scotland uses the Consumer Principles as a framework through which to analyse the evidence on markets and related issues from a consumer perspective.

The Consumer Principles are:

- Access: Can people get the goods or services they need or want?
- Choice: Is there any?
- Safety: Are the goods or services dangerous to health or welfare?
- Information: Is it available, accurate and useful?
- Fairness: Are some or all consumers unfairly discriminated against?
- Representation: Do consumers have a say in how goods or services are provided?
- Redress: If things go wrong, is there a system for making things right?
- Sustainability: Are consumers enabled to make sustainable choices?

We have identified information and representation as being particularly relevant to the consultation proposal that we are responding to.

## Our response

**Question 1: Do you agree with our proposals in the ‘Research, Evidence and Evaluation’ section? Please explain your reasons and provide any relevant supporting evidence.**

Consumer Scotland agrees with the proposals in this section, and especially the principles of continued learning, evaluation, and representation that underpin them. We would welcome, however, some further clarification about steps Ofcom will take to maximise the impact their activities will have for those who would benefit most. We provide further detail on this point below, in relation to each of the ‘Goals’ in this section of the strategy.

In Goal One, Ofcom sets out its intention to continue to use its research to inform its policy and media literacy interventions. We support this commitment to evidence-based policy making and practice. We also welcome Ofcom’s ambition for its research to be used and further analysed by stakeholders, as this can strengthen the value and impact of the evidence base. The means to achieve this goal as stated in the proposal appear to be comprehensive.

We welcome ‘Goal Two’, to amplify the voices and testimony of a range of groups within society with regards to media literacy. This aligns with the consumer principle of representation. We would encourage, however, Ofcom to provide more detail on how this will be achieved. Boosting samples is one way to help achieve the goal, but even with boosted samples, people from [seldom heard groups are still unlikely to be included](#) without specific efforts to do so, such as engaging directly with communities, cultural groups and their representatives. Ofcom should set out how it plans to proactively undertake this type of engagement work to ensure that it can achieve its stated goal. This may include, for example, working with partner organisations to understand the issues experienced by groups and communities and to consider what interventions might be most effective in preventing harm.

We welcome Goal Three, to share Ofcom’s knowledge about what works in media literacy delivery, and Goal Four, to support providers of media literacy initiatives to evaluate and create a culture of best practice. These related approaches to improve the effectiveness of media literacy interventions should benefit consumers in terms of improving their experience of media and communications technologies. We would encourage, however, Ofcom to provide further details about how the training, guidance, resources and best practices described will be disseminated and promoted to a wide range of different groups and organisations working with diverse sets of consumers. In cases where Ofcom plans to

deliver workshops or similar interventions, it would be useful for Ofcom to set out how it intends to target organisations working with consumers in specific communities across the country, to ensure that those who may derive the greatest benefit from the training are able to access it. We welcome the focus on evaluation. In such a rapidly developing area it is important to understand “what works” and to be able to refine approaches accordingly, targeting new and harmful ways in which content may be delivered as well as identifying new opportunities to mitigate harm.

**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**

Consumer Scotland agrees that platforms have a significant role and responsibility in enhancing the digital literacy of consumers. As such, we agree with proposals to promote best practice, conduct ongoing evaluation of that practice, and encourage platforms to fund media literacy programmes. As some of the proposed actions in the strategy evolve, we recommend that Ofcom provides more detailed guidance on how to ensure best practice and neutrality in their implementation to both platforms and consumers.

We are supportive of Goal One in this area, to promote best practice in prioritising the media literacy of users when they are using platforms. It will be important that Ofcom is clear about how it will monitor the progress that platforms make in implementing the regulator’s recommendations and suggestions in relation to this goal. We recommend that this progress should be reported on as part of Ofcom’s wider programme of publications on media literacy, to ensure transparency and clarity for consumers. It will also be important for Ofcom to be clear in its engagement with platforms, stakeholders and consumers, about how its media literacy work in this area will complement and support its wider online safety duties. To help achieve this, it may be useful for Ofcom to develop a set of best practice case studies which clearly illustrate how these different parts of its regulatory remit have worked in tandem, in a mutually reinforcing way, to achieve better outcomes for consumers on different platforms. For example, it may be useful to understand where a platform’s failure to implement best practice may begin to constitute a failure to comply with their obligations under the Online Safety Act.

We note [Ofcom’s own research](#) regarding consumers’ views in relation to on-platform interventions that aim to support users in their engagement with the content that they are consuming. The findings are clear that such on-platform interventions can create some positive behaviour changes, and as such, we are supportive of these being further researched, applied, and evaluated. The research also clearly shows, however, that on-platform interventions can have adverse effects for digital literacy, such as encouraging methods to circumvent interventions or consumers simply stopping using platforms. In this context, while we are supportive of the evolution of on-platform interventions as part of the media literacy landscape, we would encourage Ofcom to explore producing more detailed

guidance for platforms to make these as effective as possible. We would also concur with one of the recommendations of the study that platforms should take action to ensure that any such interventions provided are neutral, and consider that guidance on how to ensure neutrality as well as accuracy may also be beneficial. If such guidance regarding on-platform media literacy interventions were to be produced, we would also ask Ofcom to consider whether methods of public recognition of platforms following best practice, could be another way to exercise market influence and encourage action in these areas.

We support the aims of Goal Two, for Ofcom to use its' influence to encourage platforms to evaluate the impact of their interventions and foster a culture of shared best practice, in line with the principles stated throughout the strategy.

We also welcome Goal Three, which aims to ensure platforms provide funding support for media literacy programmes. We are supportive, in principle, of efforts to encourage online services to fund third-party interventions to help improve consumers' media literacy. We agree with the risks related to this work that Ofcom identifies in the consultation document, such as potential limitations around the accessibility of programmes, or programmes potentially being used to draw focus to features of the service being offered. We would also note that it is important that platforms, and those third parties who provide funding, have appropriate governance and accountability arrangements in place to ensure that third parties have the necessary independence from platforms when developing media literacy interventions. We would recommend that Ofcom considers what further advice, guidance and action it can take to mitigate each of these risks.

**Question 3: Do you agree with our proposals in this section on 'People and Partnerships'? 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.**

Consumer Scotland agrees with the proposals in this section. Applying Ofcom's approach to learning and innovation continue the development of a partnership approach to media literacy for those most in need is a sensible way to help deliver the overall strategy.

We support Goal One, to commission targeted interventions for identified groups, as an effective utilisation of the body of knowledge Ofcom continues to build. The identification of specific topics for attention is useful. It is also important, and welcome, that Ofcom has acknowledged the need to work with organisations who are experts in working with target cohorts, as this makes the interventions much more likely to be impactful.

Goals Two and Three both represent an expansion of Ofcom's training offer and the models for delivery of that offer. These are both logical and welcome aims that should help bolster

the depth and reach of digital literacy training across the UK. It is worth noting, given Ofcom's 'place-based' model of digital literacy, that digital inclusion specifically is devolved to Scottish Government. Media literacy and digital inclusion are two distinct but interrelated measures, and, it will be important for Ofcom to consider how its approach can most effectively interact with specific interventions taking place in Scotland, in order to achieve the maximum benefit for consumers.

We welcome Goal Four, to expand Ofcom's network to a wider range of organisations. We particularly support the commitment to include organisations working directly with target groups at community level. This will make the implementation of the media literacy strategy much more viable given the [trust many consumers hold in smaller, local organisations](#). The experts in working with targeted communities, mentioned as part of Goal One, will require links with many such organisations to reach the potentially seldom heard cohorts that this strategy aims to support. Given the c. [200,000 Third Sector organisations in England and Wales](#), and c. [46,000 in Scotland](#), however, identifying and engaging with the most suitable organisations across the country will be challenging, and we would welcome further detail about how that will be achieved. Once such organisations are identified and engaged with, the proposed initiative to partner them with experts through a matchmaking service will be a helpful endeavour to facilitate the sharing of learning and also provide extra value to the community organisations involved.

Goal Five, to build on Ofcom's role as a convenor of media literacy, seems to be largely focused on examining, and building a growing understanding of, future trends in technology and media literacy. Given the speed of innovation in the technological and digital sectors, this is a principle Consumer Scotland is supportive of. It will help Ofcom to future-proof their materials and interventions, and as a result, will help improve levels of media literacy among consumers as markets evolve.

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

Consumer Scotland agrees with Ofcom's assessment.

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

Consumer Scotland does not take a view on this.