



Consultation Response

Ofcom's three-year media literacy strategy

About Parent Zone

Parent Zone sits at the heart of modern family life, providing advice, knowledge and support to shape the best possible future for children as they embrace the online world. We were founded in 2005 and since then have gone on to collaborate with many organisations who share our vision. The online world offers enormous opportunities to children, young people and families. But we also know it can pose huge challenges. Our mission at Parent Zone is to improve outcomes in a connected world, so that children will be:

- safer online
- resilient to the challenges of the online world
- educated for a digital future

Ofcom consultation available to read [here](#).

Research, Evidence and Evaluation (Section 2)

Parent Zone welcomes the proposals detailed in section 2 of the strategy. Developing and delivering evidence based interventions that are evaluated and have proven impact is a cornerstone of our work.

Parents are frequently overwhelmed with information and as a result seek out conflicting expert advice or fall back on ‘following their instincts’. Whilst parents’ instincts are often good, there are significant risks that point directly to the need for parents to be supported to develop their media literacy skills. For example the BMJ¹ urged public health communicators to stop telling parents to trust their instinct’ when messages became associated with a public health risk. Thus, having programmes that are backed with an evidence base that parents can trust and will base decisions on is critical. Ofcom already plays a key role in building and sharing the evidence base and we are pleased to see that role amplified through this strategy in Goal one.

We would welcome Ofcom playing a role in building an understanding of what works in all aspects of programme design from content through to delivery and ultimately onward to behaviour change. We would particularly welcome research focused on the transmission of media literacy skills from parent/carer to child and the role of parents in shaping children’s media literacy behaviours.

In respect of Goal 4 – to support providers of media literacy initiatives to carry out evaluation – we would note that having evaluation tools that are used and result in well evaluated programmes is only part of the challenge. Evidence from the National Academy of Parenting Practitioners² highlighted that,

“Communities, service agencies and practitioners must have the capacity and willingness to implement evidence-based programme models with skill and fidelity to the chosen programme.”

We find in our own programmes that whilst evaluation is increasingly expected and included as part of funding, the cost and complexity of evaluating longer term impacts and transmission effects is prohibitive and often out of scope of short term projects. We see a valuable role for Ofcom to bring their research expertise to fill this gap.

We warmly welcome Goal two and the proposals in 2.7 to listen to different user groups. We are currently exploring media literacy in the early years through a project funded by the Nuffield Foundation. A rapid review of interventions found a complete lack of

¹ <https://www.bmj.com/content/379/bmj.o3008>

² <https://assets.publishing.service.gov.uk/media/5a7b07cbe5274a319e77c7fd/DFE-RR186.pdf>

provision, however Ofcom research shows increasing use amongst 3 - 5s and there is a strategic increase in advertising targeting this age range³

“no current interventions to improve the digital media literacy of the 0-5 age group in the literature that was reviewed.”

In addition to gaps for some age groups, we frequently see gaps in provision for specific audiences. This includes neurodiverse young people and young people with speech, language and communication needs. Parent Zone has recently designed and delivered interventions for both of these groups with Prevent funding from Home Office for the first and funding from DSIT for the latter. In doing so, we found a lack of robust evidence on which to base the interventions. Whilst inference and practice experience is helpful to plug evidence gaps, it is clearly not enough.

Finally, we would note in 2.8 a focus on toolkits and workshops. Whilst useful, these will always have significant limitations, not least a reduction in the trust parents have in organisations that ‘mark their own homework’. Where self evaluation is the only option, a one size fits all approach is challenging. Programmes are often complex to evaluate with multiple variables. This is particularly true for media literacy interventions where the message can make data capture particularly challenging. During the delivery of Parent Zone Local, a media literacy programme funded by DSIT, our trainers found it jarring to spend sessions encouraging participants to be careful with their data before encouraging them to complete surveys that in order to meet the needs of evaluation, contained detailed demographic data as well as understanding and behaviour change questions. We recognise these challenges will always exist and have used our experience in Parent Zone Local to inform the development of the follow on programme - Everyday Digital - which embeds evaluation throughout the delivery using gamification and multiple evaluation methodologies. We would hope that Ofcom will lead the way in making sure that any programme they fund has independent evaluation with an appropriate budget to design, create and embed evaluation and not rely on self conducted evaluations using toolkits however well designed.

Similarly Ofcom can play a powerful role in calling on other potential funders and enablers of initiatives to recognize the evaluation and delivery challenges and provide appropriate time and resources for organisations to build on and implement the evidence needed.

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<https://www.superawesome.com/blog/the-big-little-family-influencers-how-to-harness-the-power-of-family-co-viewing-to-effectively-engage-preschoolers/>

Overall, we welcome the proposals in this section. We recognise the need to prioritise some specific areas in relation to the online safety act (OSA) however, we hope the strategy will be flexible enough to evolve and that the Ofcom teams responsible will be suitably resourced so that outputs can adapt to emerging priorities beyond the current scope of the act. New challenges around AI, child financial harms and newer technologies such as XR will require new research, new responses and new examples of what works.

Engaging Platforms (Section 3)

Parent Zone welcomes the ambition of section three's outcome measure for online services to provide better media literacy support for their users. We agree that platforms play a crucial role in promoting media literacy to their users. We agree that this should include media literacy by design as well as education programmes ...and more.

As an organisation that has delivered multiple media literacy partnerships with technology firms we have seen first hand the impact they can have as well as the limitations when business priorities change or conflict. Making media literacy part of the compliance regime (3.1) would ensure that companies aren't tempted to pay lip service to programmes and instead invest in high quality, sustainable work that can leverage their reach, platforms and expertise.

As the delivery partner for Be Internet Legends with Google and Be Internet Citizens with YouTube we recognise the importance of third party, independent evaluation. Both programmes were independently evaluated and iterated based on evaluation findings. Experts are involved at every stage of these projects development and they continue to be integral to ensuring the programmes are delivering the right learning outcomes for their audiences. Most recently experts from education, academia, online safety and computing came together to help us shape content on AI. This level of support for a programme is unusual but it is a model that has great potential and we see value in it being shared.

The principles for media literacy by design are a welcome contribution to encouraging platforms to take more focussed and consistent action regarding media literacy. However, we would encourage Ofcom to go further where possible. Our research on developing a design pattern library has shown that providing practical patterns linked to evidence is welcomed by designers to tackle specific challenges and build understanding. It is also helpful for developing services without becoming prescriptive.

People and Partnerships (Section 4)

We agree that media literacy should be everyone's business. It is vital that we seize the opportunity for a step change in media literacy skills.

The United Kingdom should aspire to join the top cluster of countries in the European Media Literacy Index⁴. Our current position of 13th highlights a lack of progress that should be a cause for concern. In order to make real progress there is an obvious need for a more joined up approach across government. DSIT and the DfE must collaborate in order to deliver sustained change and in turn, they need to complement the work planned by Ofcom.

However, coordination is only part of the solution. The strategy rightly recognises the important role of teachers and educational professionals but we would point to a need to go further. The Media Information and Literacy Alliance recently published a [briefing](#) in which they highlight the need for media literacy to become part of the national curriculum. It is a position we endorse.

We agree with the proposals in Goal one - to commission targeted interventions in cohorts where need is greatest. Without targeted interventions some audiences will miss out. However these should be closely aligned with media literacy by design and industry support for initiatives to ensure that Ofcom's goal of amplifying voices is made possible. They should be seen as part of a whole so that the experiences and needs of targeted communities are reflected not just in the research and specific interventions but are fed into media literacy by design and wider initiatives.

Goal four is also welcome. We know that parents are most likely to trust professionals they already engage with. Supporting networks of organisations to build media literacy into their work could be an effective way to achieve change. However there are specific challenges for parenting. The parenting sector has largely disappeared under the current government. The National Family and Parenting Institute no longer exists and regulation that required all local authorities to have a parenting strategy has been removed. The National Parenting Academy has become a research academy which is valuable but cannot offer the level of parenting support that is needed and was anticipated when the academy was set up. The direct consequence of that broader context is that expert support for parents from parenting specialists is severely lacking. There is a significant and important difference between organisations that provide information to parents and parenting specialists. Both are important but the latter is in short supply. Achieving positive media literacy behaviour changes that are passed from parent to child will require an understanding of working with parents and positive parenting. Digital can be a topic that nudges less positive parenting behaviours including

⁴ <https://osis.bg/wp-content/uploads/2023/06/MLI-report-in-English-22.06.pdf>

parenting styles that are less good for children. Changing that could unlock better outcomes.

On the question of a media literacy week we would point to the approach taken in other countries and suggest that if the idea is taken forward it is aligned with EU Media Literacy Week and UNESCO's global Media and Information Literacy Week. We see value in awareness weeks including providing a focus for 'turn to professional's who might use the week as an opportunity to step outside their usual remit to engage in the topic. Our experience delivering media literacy initiatives and [the Behavioural Insight Team study conducted for DSIT](#) shows people don't view media literacy as a standalone skill but as a bridge to achieving a wide set of outcomes. Engaging a broad network of professionals in an awareness raising week could build on that learning and unlock reach and system change.

Our work with schools during Safer Internet Day demonstrates the potential of awareness moments - over 150,000 children participated in a live stream assembly on the day, one of the largest participation events we have run in a single day. However, we would balance our comments with a note of caution. Media literacy should not be a single moment of awareness. There is a risk that by establishing media literacy week the subject becomes a 'done until next year' subject and that would undermine any concept of media literacy as an important part of daily life. In Finland they regard media literacy as a matter of national security. An awareness week could risk trivialising the subject.

Impact of the Strategy on Specific Groups

We agree with the assessment outlined in the strategy but would urge Ofcom to give careful consideration to how best to uphold children's rights. The online safety act will mean the internet becomes more age aware. We are already seeing an explosion in the number of parental supervision tools and whilst this is potentially a positive step - user empowerment tools are an important way to give agency and control - taken together, children may find their access to a broad range of media is severely limited. This is a heightened risk for children whose parents have values and beliefs that lead them to restrict and control the information or messages young people can access. Article 3 of the UNCRC states that "the best interests of the child must be a top priority in all decisions." It will not be enough to assume that parents will at all times be best placed to make the right decision.

We would also highlight new and emerging risks for children and young people including child financial harms. Our research found that almost all (96%) of young people buy things online with 61% using their own debit card to do so. Whilst fraud is not a designated priority area, Ofcom's 2024 childrens and parents media lives research shows the most common rule parents have for children is around spending money (54%). Despite that, the idea that young people are not financial agents in their own right

continues to be a widely held view that trickles through to gaps in policy and regulation. The strategy repeats that pattern. We would point to a need for greater understanding of the intersection of financial literacy and media literacy and would hope for that to be included within Ofcom's research strategy.

New and emerging technologies will present challenges for media literacy that current models and initiatives are not set up for. Understanding the additional literacies and skills people need in relation to generative AI, immersive and extended realities, knowing what initiatives are most effective and demonstrating how best to provide support in these contexts should be priority areas of the strategy. This will ensure that the infrastructure and evidence is in place for a new paradigm and we are not trying to deliver an outmoded view of media literacy whilst the environment people are in changes radically.

Whilst many of the challenges that specific cohorts face will be out of scope of Ofcom's remit or strategy, greater consideration and acknowledgment of systemic issues that limit media literacy is needed. Otherwise there is a significant risk that information and education become the only solutions offered to people. This is not all that is needed and is especially problematic for some of the groups of people highlighted in the strategy.