



## Consultation response

Ofcom recommendations for online services' promotion of media literacy in the UK

## About Parent Zone

Parent Zone is an organisation that sits at the heart of digital family life, providing advice, knowledge and support to shape the best possible future for children as they navigate a digitised world. Founded in 2005, we have collaborated with many organisations who share our vision, remaining responsive to the continually developing nature of digital technologies, and how they intersect with family life. We recognise enormous opportunities, whilst understanding the challenges that accompany them.

You can read Ofcom's consultation and proposed recommendations for services, [here](#).

Question 1: Is it clear which types of organisations the 10 proposed recommendations are aimed at? Please provide reasons and evidence to support your answer.

1. It is clear which types of organisation these recommendations are aimed and it is encouraging to see that the breadth of the digital ecosystem is covered. We would suggest that it might be helpful to provide further clarity in some areas. We detail these below.

- a) Service categorisation. Albeit categories that are well defined from a regulatory perspective, the overlap of functionality and use means that it might be hard to draw clear-cut distinctions between video-on-demand (VoD) services and streaming services. For example, a service like Kick is primarily a live-stream platform but it also allows users to watch past broadcasts and is therefore also a VoD service. Similarly, although ‘generative AI services’ are described as including “chatbots, AI character apps, and audio, image, and video generators, as well as other kinds of generative AI content creation services” the guidance could perhaps go further to distinguish each type of generative AI service. The way in which media literacy could be built into the design of a video-creation tool is likely to be markedly different from how a companion chatbot could foster media literate behaviours. The harms users may encounter are likely to be distinct, too.
- b) ‘Social media platform’ whilst seemingly well understood as a term can be opaque. Snapchat’s own site refers to the platform as a “communication service”<sup>1</sup> rather than specifically referencing social media, and WhatsApp is often categorised as a private messaging service – though it is clear that both have many functions, features, and use cases that overlap with ‘traditional’ social media platforms.
- c) ‘Online Games’ should include gaming apps, but it is feasible that these apps would not consider themselves as relevant to Ofcom’s recommendations. Similarly a platform like Steam which is a games marketplace might feel they are not captured by current categorisation.

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<sup>1</sup> [“What is Snapchat?”](#)

2. In summary, the guidance is clear but we would recommend taking a 'for the avoidance of doubt' approach to ensure that any potential ambiguity is removed.

Question 2: Do you have any comments on whether they should apply to all organisations, including those of different sizes and operating models? Please provide reasons and evidence to support your answer.

3. We recognise that small and emerging platforms cannot be expected to invest in promoting media literacy at the same level as larger platforms and that there clearly needs to be an element of proportionality. However, there are some components of recommendations that we think should apply to all organisations – including those of different sizes and operating models.

- a) Naming of tools. Parents would like to see consistency for the naming of tools across platforms. Terms like ‘muting’ and ‘hiding’ are currently used to mean the same thing by different services. This is unnecessarily confusing and would be an easy fix that would increase familiarity and, potentially, usage of tools. It would also remove some UX costs if platforms adhered to a set of basic terms to cover the most common user empowerment tools just as they do already for icons that represent settings (the cog).
- b) Clear labelling. We know from other industry regulations that it is possible for organisations of all sizes to provide key information in digestible formats. The 2006 introduction by retailers of standardised ‘front-of-pack’ nutrition labels allowed users to make more informed decisions around the food they purchased – with research demonstrating that this led to a reduction in the consumption of calories, saturated fats, and sugars.<sup>2</sup> Whilst it is more complex to identify the type of consistent labelling that digital services should provide, we would like to see the introduction of ‘bite size’ information to flag critical points. For example, digital labelling in the form of pop-ups could be used to remind users that their data is being collected. The same technique could be used to remind parents to revisit parental control settings. These proactive steps are not costly and could therefore be adopted by all organisations.
- c) Settings. Parents tell us that they find some settings particularly difficult to locate. This is especially true if they are looking for settings on a platform their child uses but they themselves do not. For example, whilst it is always

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<sup>2</sup> [The response to nutritional labels: Evidence from a quasi-experiment - ScienceDirect](#)

easy to find the 'subscribe' setting it is often extremely difficult to find the unsubscribe one. Helping children to unsubscribe from paid for services is something parents often need to do. Our research shows that over one in five (22%) young people have subscribed to a service and then been unable to cancel it.<sup>3</sup> For parents with low literacy levels or English as a second language this is even more difficult.

4. Parents are faced with an overwhelming task of staying up to date with rapidly changing digital environments and a dizzying number of apps and platforms. Gaming is particularly opaque with PC games being sold as 'bundles' based on similar genres rather than consistent age ratings (labels). Setting some basic standards for naming, labelling and settings across all services would help parents make informed decisions, as well as help organisations working hard to increase parental understanding of these platforms.

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<sup>3</sup> [A problem hiding in plain sight?](#)

Question 3: Do you have any comments on the proposed recommendations? Please provide comments in particular on their effectiveness, applicability or risks. Please provide evidence to support your answer.

**Recommendation 1:** Embed media literacy by design, making inclusive design choices a foundational principle in service architecture and policy

5. We would strongly agree that embedding media literacy by design and making inclusive design choices a foundational principle in service architecture and policy is the right approach. For too long, the priority for services has been ‘stickiness’ and commercial effectiveness.

- a) Work which Parent Zone undertook to explore how well developers understood implementing positive design choices suggested a significant gap in understanding. 28% of tech workers in the UK have seen decisions made about technology that they felt could have negative consequences for people or society.<sup>4</sup> We know that Ofcom has already done work to explain and promote best practice design principles for media literacy and encouraged online services to pledge to prioritise media literacy. Further work to build on those principles would be welcome. As one digital agency asked us:

*“How can you help the likes of us, digital service designers and developers, easily, efficiently, effectively understand the consequences of internet safety to our practice?”*

We would recommend the development of a pattern library: a resource that provides examples of evidence-based good practice that can be implemented into common critical user journeys of a product, service or platform.

- b) Our research has shown user tools and controls have a number of limitations. They can be difficult to locate and, even when found, confusing in how they actually change the experience of a service.<sup>5</sup> Many tools aren’t standardised – meaning they work differently from service to service – and even within the same

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<sup>4</sup> [People, Power and Technology](#):

<sup>5</sup> [Online safety tools — a false hope?](#)

platform, tools often change over time.<sup>6</sup> Simplicity of language and clear explanations of features is one way of improving the use and effectiveness of user tools, and possibly improving their benefit to users. We would suggest caution is also needed to respond to the risk of platforms who claim to have built ‘media literacy by design’ features whilst actually simply adding complexity.

- c) We welcome Ofcom’s specific reference to children’s needs when it comes to inclusive and effective design. Calls for “simplicity, safety, and clarity” including “default privacy settings, simplified language, and clear explanations of features” are important, particularly given that users are likely to stick to default settings, or settings put in place during onboarding to a service.<sup>7</sup> We would highlight that the average reading age of UK adults is 9-11 years old.<sup>8</sup> For all users, we would recommend this as a ceiling.
- d) Finally, embedding media literacy by design in some areas of a platform or service should not excuse measures which inhibit media literacy or cause related harms. We see this most commonly with dark pattern design which is used to encourage spending, particularly in games. Almost half of children (49%) say that gaming is only fun when you spend money.<sup>9</sup> This is often because monetisation techniques are used that include having to ‘grind’ to progress to a new level, meaning players need to buy items in order to stand any chance of winning. Other dark patterns include making it easy to subscribe to a service and extremely difficult to unsubscribe. Indeed many apps in the Apple App Store choose not to handle their own unsubscribes, meaning it is literally impossible to know in an app how to do so. We are also particularly concerned that as games start to embed AI NPCs (‘non-player characters’) into gaming titles these characters will feel and behave as though they are in fact ‘real’ player characters. This will make it even more difficult for users to make informed choices.

## **Recommendation 2:** Offer clear, meaningful choices and transparent information at key points in the service experience

6. We welcome this recommendation whilst recognising that in practice it can be complex to implement and therefore to work. For example, research from the

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<sup>6</sup> Ibid.

<sup>7</sup> <https://china.elgaronline.com/edcollbook/edcoll/9781782549574/9781782549574.xml>

<sup>8</sup> [Regional health literacy](#).

<sup>9</sup> [The Rip-Off Games](#)



Behavioural Insights Team<sup>10</sup> found that most people simply accept cookies despite the option to decline them being offered to users – seemingly – at the ‘right’ moment in a user’s journey, and usually in transparent terms. This suggests that the devil will be in the details for this recommendation. Platforms will need to consider which choices are the most important, when they should be made by a user, how often they should be revisited, and how they can be made transparent. We would note some further specific challenges for parents:

- a) The service experience is clearly very different for a supervising parent. Tools like ‘block’ and ‘report’ will be used by young people when their parent isn’t necessarily alongside the child user. By contrast, setting cookie preferences and privacy settings might be done together at set-up or onboarding moments of using a service. We would welcome additional clarity in the recommendations that reflect this duality of purpose.
- b) We would also note that quick choices aren’t always conducive to good media literacy behaviours and habits. For example, although frictionless payments do make purchases quicker they don’t always result in thoughtful choices from the user. Ofcom should stress in their guidance that key points in the user experience need to balance ease and simplicity, as well as ‘slow down’ moments for the user to be given important information (albeit in a digestible form).

### **Recommendation 3:** Equip people with practical tools to manage and personalise their online experiences

7. Parent Zone has looked at the tools and controls which platforms have created for parents and found many concerns which are becoming worse, not better, with the proliferation of parental controls.<sup>11</sup>

- a) Across 8 platforms, we found a total of 121 tools. In total, it took 7 hours and 18 minutes for our researcher to find and activate these controls.<sup>12</sup> Some of these tools have similar functions but are labelled differently, or alternatively have similar iconography but different functions. One of the parents we spoke to captured the frustration expressed by many others:

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<sup>10</sup> [Evaluating browser-based cookie setting options to help the UK public optimise online privacy behaviours](#)

<sup>11</sup> [Online safety tools — a false hope?](#)

<sup>12</sup> Ibid.

*“They’re tricky to find, and they’re not standardised.”<sup>13</sup>*

Where tools are confusing and difficult to use, they can be acting as a placebo for safety. They do no real good but allow platforms to point to them as a risk mitigation measure. They can place the onus on the user rather than the platform to moderate harmful or misleading content and features.

*“It’s overwhelming – because it’s just like another job isn’t it?”*

- b) Finally, we would recommend caution using phrasing like ‘personalise their online experiences’ when referring to users. Within the context of this guidance we interpret this to mean helping users have more control and make safer choices, but it is easy to conflate the term ‘personalisation’ with things like recommender algorithms and microtargeted advertising – which naturally come with their own problems. We recognise that is not what is intended, but clarity would be helpful.

**Recommendation 4:** Empower people with the knowledge, skills and confidence to understand, interpret and critically assess the credibility of the content they encounter

8. Recommendation 4 is an ambitious recommendation and clearly an important one. It is a task that is more pressing and challenging in a world of increasingly sophisticated AI tools. We would like to see this recommendation unpacked and expanded to give examples of what is meant under each of those areas.

9. We would also note the importance of measuring whether empowerment has been or is being achieved on platforms. There is a risk that placing information in a ‘family centre’ or setting up a performative ‘parent panel’ will be considered enough by services. Demonstrating proactive efforts to increase knowledge and skills coupled with a measurable increase in confidence should be an expectation to measure success under this recommendation.

**Recommendation 5:** Empower and support parents and caregivers to guide and support younger users in age-appropriate and meaningful ways

10. It is encouraging to see parents’ role highlighted as an important means for children to learn to navigate and manage their use of services. For too long the internet treated children as though they were adults and ignored the critical role of parents. It is little

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<sup>13</sup> Ibid.

surprise that many parents are now supportive of bans and more draconian measures. Supporting parents remains a significant task that is hampered by a lack of national parental support infrastructure and also a lack of investment. There is a lot that could be done so we welcome the recommendations made. We would also highlight that:

- a) Having default settings that are clearly explained alongside parental controls that are available at the point of setup will help parents who struggle to deal with the vast number of control options.
- b) Parental controls should include clearer information about media literacy implications and opportunities of design choices and tools. For example tools that restrict access to certain content could provide tips to help parents explain why the content isn't suitable.
- c) Age ratings are currently based on 'self-reporting' with developers marking their own homework. As a foundational guide to 'age appropriate' experiences it is vital that the age ratings ecosystem is sorted out. The BBFC provides a good model that has not yet been adopted by other industries most notably the gaming industry.
- d) Platforms frequently say that it isn't their role to tell parents how to parent. We would strongly agree with this, but equally point out that platforms do nudge parenting behaviour. Without any proper scaffolding of those nudges they are too often encouraging less effective parenting approaches. When setting strong privacy and safety defaults we would recommend that the guidance also reminds services to ensure these are transparent and understandable by minors and designed to foster empowerment in meaningful ways.
- e) We note that the guidance recognises that the tools are particularly relevant for parents and caregivers with younger children. An explicit reference to children in the early years (0-5) would be welcome and an important addition. This formative stage can be vital for later media literacy skills and behaviours, especially as intergenerational learning gets more difficult the older children get. Given the distinct lack of initiatives and programmes tailored for this age range, equipping parents with the tools to guide and support young children is particularly important. Providing parents with in-service tools that make their own devices safer to hand over to a pre-schooler would also be a helpful innovation.
- f) For many parents, navigating the services their children use is an overwhelming task. There are simply too many apps, platforms and games to keep up with and

the experience within each is different for every child using the platform. It is absolutely critical that parents receive tailored guidance and support that goes beyond ‘family centre’ information on a platform or an information website. The inclusion of ‘in-person’ support is therefore extremely welcome. We would recommend explicitly adding that the support should be expert-led and evidence-based.

**Recommendation 6:** Empower, engage and enable expert third parties to provide enhanced support, helping to extend the reach and impact of media literacy efforts

11. Helping third-parties to provide enhanced support is a helpful recommendation and one that could help to achieve scale and cut through to audiences that need more targeted interventions. However, we would note that:

- a) Signposting within platforms to services – whilst welcome – puts additional pressure on those services. For example, ChatGPT recently signposted Shout, the UK’s free text based mental health service, without telling them. This led to an immediate spike in contacts with an associated pressure on resources.
- b) Encouraging online platforms to share timely links to expert third-party sources assumes that those platforms will be able to identify the best sources. Previous attempts to develop approved lists of sources have failed with good reason. However, it could be worth exploring how to facilitate the identification of appropriate sources particularly in sensitive areas such as mental health, gender, sexuality and self-harm.

**Recommendation 7:** Help people understand, interpret and assess the credibility of information by creating and/or promoting relevant programming or educational content

12. We welcome this recommendation in its application to broadcasters and streaming services as well as the equally specific guidance on collaborating to deliver media literacy content. Given the reach of these organisations we agree with Ofcom about the scope for this activity to deliver impact. We would also highlight that:

- a) The response to the series ‘Adolescence’ demonstrates the potential for content created for, or by, a streaming service to have impact. We would however note

that impact without associated educational materials or follow through can result in panic without a solution. Where content is developed that is likely to shock or alarm we would want to see follow through to genuinely support parents, caregivers and young people to make informed decisions.

- b) We recognise that trust in the BBC remains high but research suggests it is highly polarised along political lines.<sup>14</sup> This is a matter for concern and a reason to balance the benefits of coordination and scale with the need for a multiplicity of voices with the potential to engage different audiences.

### **Recommendation 8:** Promote media literacy beyond services, investing in campaigns, content, and partnerships that promote media literacy skills

13. Parent Zone has been delivering media literacy partnerships since 2004. We know first-hand that partnership between online services and expert third-party organisations can have both reach and impact. Indeed, corporate funding has enabled programmes to scale in ways that other funding (grant and statutory) has not.

14. In 2015 Digital Parenting magazine, a publication we developed and distributed in partnership with Vodafone, became the largest circulation magazine in the UK. This year, we are celebrating teaching 10 million children through the Be Internet Legends programme in partnership with Google. Both programmes were independently evaluated and both demonstrated measurable results:

*“Children who have received Google training are **twice** as likely to say they can spot at least one clue that something may be suspicious, misleading or a scam online.”*

*“**Twice** as many children who received Google training spotted someone trying to trick them into sharing personal information by ‘Phishing’ compared to those who haven’t received the training.”*

15. This impact is achieved thanks to expert design, scalable delivery and ongoing investment. There are learnings we would flag:

- a) Not all corporate partnerships or campaigns are made equal. Parent Zone has turned down and ended partnerships with corporates who asked to write their own content, design their own interventions or introduce product marketing. Funding models that are based on delivery without partner expertise or

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<sup>14</sup> [Examining trust in public service news providers: A comparison of the BBC and NHK](#)

third-party validation can be problematic.

- b) Corporate partnerships should never be at the expense of transparency or used for ‘greenwashing’. Done badly corporate partnerships can be used as window dressing. Effective partnerships should be long-term, have reach and impact and be willing to publish results.
- c) There is an inevitable power imbalance particularly when organisations are struggling to raise funds. This recommendation should take care not to encourage poor quality, underfunded or performative partnerships. We hope it is an opportunity to raise standards in corporate partnerships and therefore welcome the specific recommendation that services “actively support media literacy skills development by committing to long term funding of skills-building programmes”.
- d) A healthy ecosystem needs to have all partners contributing. The current lack of statutory funding and short-term grant programmes risks creating an unbalanced ecosystem. This recommendation could be extremely effective and drive more investment but it needs to be balanced with other funding sources, other partnerships and other campaign models.

## **Recommendation 9:** Support the media literacy of underserved and diverse audiences

16. Parent Zone has specific experiences of reaching underserved and diverse audiences. Projects have included work for SEND communities including with non-verbal young people who are often locked out of important conversations because resources have not been created for them.<sup>15</sup> Significant progress has been made with inclusive web design practice helped by the clear leadership shown by Government, including the publication of inclusive web design principles in 2011.<sup>16</sup>

17. Replicating this approach to ensure media literacy design principles (that include inclusive design principles) are promoted and adopted would be helpful. However, we agree that it is also important for online platforms to form partnerships with a wide range of third sector organisations, government bodies, Ofcom and grassroots community groups. This work is complex and resource intensive. We wish to highlight that:

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<sup>15</sup> [Talk:Tech | Parent Zone](#)

<sup>16</sup> [Inclusive web design principles published - GOV.UK](#)

- a) Our DSIT-funded Everyday Digital programme was designed to reach underserved and diverse audiences. Delivered in partnership with local champions working in community settings, the programme is now embedded in 29 local authorities across the UK. An independent evaluation found that parental confidence scores rose by 27%, with notable improvements in media literacy (45%) and online safety discussions with children (32%).<sup>17</sup> Having frequently experienced provision being taken away, this audience is particularly sensitive to short-term funding. We would therefore highlight the need for any partnerships to be sustained and meaningful.
- b) We know that digital agencies and platforms struggle to adopt inclusive design principles without clear guidance. We would therefore recommend adding a recommendation for companies to invest in training their digital teams in inclusive design and media literacy promoting UX and content.

**Recommendation 10:** Conduct and publish evaluations of the impacts of their choices and activities

18. We welcome the recommendation to conduct and publish evaluations of the impacts of services' choices and activities. Larger platforms demonstrating success should not only build a stronger evidence base for what works but also incentivise other services to do more. We would be particularly keen to see evaluations that show:

- a) Behaviour change over time. Some platforms currently have dark nudges that encourage specific behaviours. Evaluations should show a clear baseline with specific changes to user behaviours. Adding and testing changes that promote media literacy is important and will be valuable when evaluated. Even more valuable could be the data that shows how designing out choices can change user behaviour.
- b) For education initiatives or partnerships we strongly support the need for evaluation. This is the only way to offset the risk that partnerships are performative rather than impactful. We would note that it will be important to have clear intentions for any intervention that can be tested. It is also vital that the evaluations are, wherever possible, independent of either the funder or the delivery organisation.

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<sup>17</sup> [Parent Zone Everyday Digital: Final Evaluation Report](#)

Question 4: Are there any other additional recommendations you think we should consider? If so, please provide evidence to support your comment.

19. An additional recommendation that encourages platforms to share – where they are able – their product roadmaps to enable third-parties to anticipate information needs (and prepare for technological changes) could be a valuable addition. Parent Zone benefits from being part of various advisory boards and has seen first-hand the value of knowing what is coming.

20. For example, we were able to develop the first guide to parental supervision in VR in partnership with Meta when they launched Horizon Worlds in the UK. This was thanks to Meta recognising the need for this information to be available ahead of the product launch. More commonly, product changes or launches are made without time for organisations to prepare.



## Question 5: Do you have any examples or suggestions of ways of encouraging services to adopt these recommendations?

21. We support Ofcom applying these measures to as many organisations as is feasible, but the question naturally becomes one of compliance. Some services – particularly smaller, harmful platforms – seem unlikely to implement these recommendations given that they are non-mandatory.

22. The direction of travel does appear to point to a move away from proactive media literacy activities and towards a more *laissez-faire* approach for some platforms. There have been redundancies of moderators<sup>18</sup>, hate speech policies pared back and weakened<sup>19</sup>, and fact-checkers being replaced in favour of community notes.<sup>20</sup>

23. Geopolitics clearly plays a role in this. In June 2025 United States Commerce Secretary Howard Lutnick rebranded the US 'AI Safety Institute' as the Center for 'AI Standards and Innovation' and there is a general concern that this is not just a matter of semantics. If some of the largest (and therefore under most scrutiny) platforms fail to make decisions that can offset harms there seems little reason for other platforms to comply of their own accord.

24. One way to improve uptake of the recommendations may be to leverage existing research on the financial and branding benefits of online safety. 2024 research from the NSPCC and Baringa found that acting with user (and child) safety in mind can have positive impact on branding – with 71% of adults thinking that companies prioritising online safety are more trustworthy and 63% being willing to pay a premium for products and services with strong child safety measures and commitments to safety.<sup>21</sup> By collating and clearly communicating research findings like these to relevant organisations, Ofcom may prompt services which are only economically-minded to apply their recommendations. Market competition is an effective way to drive change.

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<sup>18</sup> ['We wouldn't let our children on the app': TikTok moderators warn users may be at risk after redundancies](#)

<sup>19</sup> [LinkedIn Joins Meta and YouTube in Abandoning Policies Designed to Counter Anti-Trans Hate | TechPolicy.Press](#)

<sup>20</sup> [Meta to replace 'biased' fact-checkers with moderation by users - BBC News](#)

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[https://www.nspcc.org.uk/globalassets/documents/about-us/what-we-do/cso-taskforce/nspcc-cso-good-for-business-30.09.2025.pdf?utm\\_campaign=20251006\\_KIS\\_CASPAR\\_October06&utm\\_content=Child%20safety%20online%3A%20good%20for%20business%20opportunity%20%28PDF%29&utm\\_medium=email&utm\\_source=Adestra](https://www.nspcc.org.uk/globalassets/documents/about-us/what-we-do/cso-taskforce/nspcc-cso-good-for-business-30.09.2025.pdf?utm_campaign=20251006_KIS_CASPAR_October06&utm_content=Child%20safety%20online%3A%20good%20for%20business%20opportunity%20%28PDF%29&utm_medium=email&utm_source=Adestra)

25. Likewise, unless Ofcom clearly stipulates which of the 10 recommendations apply to which types of organisation, many services may try to ‘get off the hook’ by suggesting that – given their size or operating model – implementing these recommendations is not possible or would have an overly detrimental effect on the organisation. Similar concerns have been raised around Ofcom’s use of the ‘technically feasible’ condition (Schedule 4, paragraph 2 of the OSA) in its codes and measures. This concern hinges on the possibility that an organisation *may* argue a given duty can’t be complied with because they do not currently have the systems in place (or resources) to implement it. Similar reasoning could be put forward by a service provider to argue that they cannot adopt Ofcom’s recommendations, especially given that they are not mandatory.

26. Risk assessments may be another route to encouraging services to adopt Ofcom’s recommendations. Whilst platform-funded media literacy initiatives never make the existence of harm on a platform acceptable, developing the media literacy skills and capacities of user bases are one way to mitigate risks and are therefore relevant to assessing risk.

27. Finally, one route to compliance would be to move beyond recommendations which support media literacy and instead set these out as mandatory duties. There is the possibility that, where certain harms overlap with codes and measures set out under the OSA – such as those relating to “transparency reporting” or “user empowerment” or which use media literacy to counter online harms – Ofcom would be able to push for duties which fostered and promoted media literacy. In the immediate future, more needs to be done by Ofcom to highlight areas where there is explicit crossover between media literacy and the OSA, and to then explore the possibility of strengthening recommendations to mandatory duties.