

**The Rt Hon Baroness Keeley of Worsley
Chair of the House of Lords Communications
and Digital Committee**

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By email only

3 October 2025

Dear Baroness Keeley,

Thank you for the opportunity to provide written and oral evidence to the Committee's inquiry into media literacy. We have read your report, and we welcome the Committee's engagement with these important issues.

We agree with the conclusion in your report that Ofcom cannot deliver a comprehensive media literacy programme across the UK. As you know, a key element of our strategy is to support others, both in Government and elsewhere, to improve the UK's media literacy outcomes. We aim to do this by establishing what works, disseminating our findings, and leveraging our networks across civil society, local and national Government, and industry to improve understanding and application of best practice.

The Committee's report made specific recommendations for Ofcom which I respond to in turn below.

Ofcom should update its definition of media literacy to make more explicit reference to critical thinking.

As you know, we define media literacy as 'the ability to use, understand and create media and communications across multiple formats and services'. This definition captures the breadth and complexity of the media landscape in the UK. We note, as you have in your report, that many witnesses endorsed this definition for its clarity, concision and breadth.

We agree that critical thinking is a key capability needed for individual media literacy, and our most recent annual conference focused on critical thinking specifically. Our definition includes the term '*understand*', and we believe that critical thinking is an essential faculty needed to understand media. In line with this our [Outcomes Bank](#) includes Area 3: 'Critical thinking about content', helping stakeholders consider the importance of critical thinking when designing and evaluating their media literacy initiatives.

Our intention in defining media literacy was to bring together a single, and widely applicable framing of media literacy for the sector, in order to achieve a sense of consistency that the field sometimes lacks. The definition is now widely known and widely used by our stakeholders. Therefore, while we are not minded at this time to make any changes to our definition, we will consider your comments to make sure that we emphasise the importance of critical thinking when engaging with stakeholders going forward. We will also continue to keep this definition under review and revisit it as and when we form future strategies, to ensure we continue to have a definition of media literacy that brings its full meaning to life.

In order to build on its existing evidence base, Ofcom must enable longer-term and larger-scale research projects, rather than multiple short-term pilots.

We welcome the conclusion in your report that our research has been valuable in establishing 'what works'. As set out in our strategy, we see our role as a catalyst-convenor, and an important part of

that role is building a strong evidence base, including through our community pilot projects, evaluation, our work with platforms and our research reports.

Longer term projects form part of our programme of work, including our annual Adults' and Children's Media Lives studies, which we have been conducting since 2005 and which is frequently cited by others in the field. We use this longitudinal research to inform our approach to the community pilots that we commission.

Skills development across the population requires significant investment and action across a range of actors, and Ofcom does not have the infrastructure to address these issues at scale. In running community pilot projects we are focussed on how we extract lessons that can inform the work of others at scale. We are ready to share our learnings and insight with partners across sectors should they wish to scale up approaches we have tested. We already share insights in a range of ways – through publishing and sharing the evaluation reports prepared by our community organisations, convening and hosting 'lunch and learns', and through sessions at our annual in-person conference.

Beyond this, for the first time we are establishing multi-year initiatives in four areas, to learn what can be achieved by longer term schemes compared to our previous single-year pilots. As with our previous work we will publish the findings and recommendations to help others scale long term media literacy interventions.

In its forthcoming statement of recommendations for platforms, Ofcom must set out minimum standards for media literacy by design. The statement should also give details of how platforms' performance in meeting these can be evaluated and how platforms will be held accountable.

We published a [consultation on our Statement of Recommendations](#) on 15 September, which contains recommendations for how services can be designed to support media literacy of users, building on our Best Practice Principles.

The consultation includes a range of practical steps that services can take to implement media literacy by design. For example, we recommend that services offer clear, meaningful choices and transparent information at key points in the user experience, such as during sign-up, profile creation or when encountering synthetic content. The Statement also addresses wider activities that services and broadcasters can undertake to support media literacy beyond the design of their services, such as creating or promoting relevant programming or educational content, or by investing in campaigns, content, and partnerships that promote media literacy skills. Rather than setting out minimum standards, the Statement offers an ambitious vision for how service providers can contribute to improving media literacy across the UK.

In contrast to the safety duties set out in the Online Safety Act, the Statement of Recommendations is not legally enforceable. However there are other ways to drive change, first by engaging widely with regulated services on the proposals. Once we have finalised the Statement of Recommendations, we will track progress and hold services to account by conducting research and wider intelligence gathering to assess adoption across the industry. As ever with voluntary initiatives there will be a variety of responses from industry, but we will drive progress by showcasing services and broadcasters that deliver on the recommendations. This will provide evidence for what can be achieved and how, raising expectations on others to follow suit.

As required by the Act, we will, from time-to-time, review and revise the Statement. In doing so we will evolve our approach based on our learning to date, and consider new technological and consumer trends, so that it is as effective as possible at driving positive change.

In responding to this report, Ofcom must clarify how it will use its wider powers under the Online Safety Act 2023, to drive greater activity and accountability from platforms. This should include detail on how it will use its information gathering powers to investigate the efficacy of platforms' media literacy interventions, as well as its intentions to include media literacy in the transparency reporting or user empowerment requirements for services that are 'categorised' under the Act.

The Online Safety Act gives Ofcom a range of powers to improve outcomes for UK citizens and hold online services to account. Our codes of practice for illegal harms and the protection of children set out the steps that services should take to meet the duties they have been given under the Act. If services fail to comply with those duties, either by following the steps in the codes of practice, or by taking effective alternative measures, we can take enforcement action, including financial penalties and business disruption measures.

A number of the measures in our codes of practice already include interventions that will improve media literacy, drawing on our media literacy expertise as a toolkit to address online harm. For example, in both sets of codes of practice, we require that children are provided with supportive information and context at critical points in their online user journey to enable informed decision making. These moments include when they turn off certain default settings, block or mute another user's account, or report content on a user-to-user service. We also require that all services make their terms of service clear and accessible, that they have complaints systems and processes which are easy to find, access and use, and that they provide age-appropriate user support materials. In this ways, media literacy is woven throughout our work to drive change through the online safety regime, and, as set out above, measures in the codes of practice are complemented by our Statement of Recommendations (and Best Practice Principles for Media Literacy by Design).

As noted in your report, the Act gives us powers to gather information from services, and some services (known as "categorised services") will have additional duties in relation to transparency reporting, user empowerment and other areas. Our [Information Powers Guidance](#) and [Transparency Guidance](#) set out when and how we may use the relevant powers to enforce the codes of practice for online services, including those that contribute to media literacy to counter online harms. We use these powers based on our assessment of how we can best protect UK citizens from harm on regulated services and continue to develop our plans in this area.

I hope this provides helpful clarification. As ever, we are more than happy to discuss this work further with you and the Committee in future.

Yours sincerely,

A handwritten signature in black ink that reads "Kate Davies". The signature is written in a cursive, flowing style.

Kate Davies