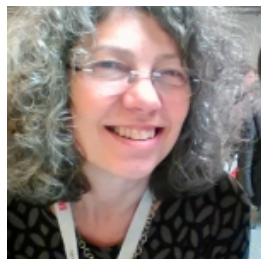# Why is media literacy prominent in the UK's draft Online Safety Bill 2021?

The UK government recently published a [draft Online Safety Bill](#), which it says delivers on its commitment "to make the UK the safest place in the world to be online while defending free expression." Following the [LSE briefing](#), Professor [Sonia Livingstone](#) reflects on the position of media literacy in the proposed Bill.

As stated in its first sentence, the purpose of the Bill is:

"to make provision for and in connection with the regulation by OFCOM of certain internet services; and to make provision about and in connection with OFCOM's functions in relation to media literacy."

The prominence given to media literacy in the Online Safety Bill is very welcome to those who have long advocated for it. Yet its treatment in the Bill has not been much discussed, compared with [other aspects](#) of the Bill, even though the Bill proposes a particular, and in some ways limited, approach to media literacy that tends to positions the public as [consumers rather than citizens](#). This matters because consumers' need for media literacy can be limited to ensuring instrumental uses of technology and avoiding harms such as disinformation, stopping short of [the critical understanding](#) needed to participate creatively or politically as [citizens in a digital world](#).

Twenty years ago, we had a [hotly contested debate](#) around the [Communications Act 2003](#) in specifying Ofcom's promotion of media literacy [in Section 11](#). How narrowly or ambitiously should it be conceived, and to what end should it be promoted and by whom? For those of us aware that the UK has long been [a world leader](#) in media education, the results were disappointing.

Now, chapter 8 of the [Online Safety Bill 2021](#) ("Media Literacy") substitutes a new and much longer text for the original section 11. Does this reflect an increased importance of media literacy? I decided to track changes from the old to the new versions to see just what's being said.

Several problems with the proposed approach to media literacy stand out:

1. The role of critical evaluation. In the academic world, media literacy has [long been defined](#) as the ability to access, analyse, evaluate and create communications in any form. In 2003, Ofcom dropped the "evaluation" dimension of this definition, a decision that now looks unwise given the [advent of disinformation](#). If only we had spent the last twenty years promoting the public's [capacity to evaluate](#) digital content!

In the Online Safety Bill, this dimension has been brought back, with media literacy defined as including "an understanding of the nature and characteristics of material published by means of the electronic media […and] an awareness and understanding of the processes by which such material is selected or made available for publication." But [research suggests](#) that any teaching of these matters at school is patchy at best, and that few teachers are supported or [trained to provide](#) such teaching.

2. The role of communication and content creation. Research also suggests that *creating* communicators – as agents, citizens, communities, even future media producers – is an excellent way of [facilitating media literacy](#). But there seems no mention at all of the creative dimension of media literacy in the Bill. Nor is it much in evidence in our schools.

3. Media literacy depends on the legibility of the digital environment. Put this another way – you cannot teach people to 'read' a text, an interface, an ecology that is illegible, opaque, disguised or impossible complex. In this context it seems significant that the Bill has proposes to drop the previous section 11 requirement that Ofcom should "encourage the development and use of technologies and systems for regulating access to [electronic] material."

While other parts of the Bill encourage these, the previous formulation recognised the link between media literacy and digital content provision: systems that regulate access must, among other requirements, be designed in ways are legible, so that people can understand the digital services they receive, and they must be offered genuine and granular choices so that they can act meaningfully on their understanding.

4. Promoting media literacy requires educational initiatives. Paragraph (3) of the Online Safety Bill states that "OFCOM must, in particular, carry out, commission or encourage educational initiatives designed to improve the media literacy of members of the public." This is a new and curious requirement for a market-focused communication regulator. Education takes years, not hours. The General Comment 25 on children's rights in relation to the digital environment requires that media and digital literacy education begins when children start school and is sustained through their school years. How Ofcom will work with the Department of Education remains unclear. Nor has the Department of Education a track record of valuing media education.

5. Promoting media literacy risks exacerbating prior inequalities. Although the Bill conceptualises online harm according to a risk assessment, it seems not to extend this approach to media literacy. Yet media literacy is particularly vital for people in higher risk situations – marginalised groups more vulnerable to disinformation, for example, or those with disabilities in need to digital resources to participate in society. As with all educational initiatives, if we don't target those particularly in need, the overall effect will be to increase the knowledge gap, benefiting the already-advantaged more than those in disadvantaged situations.

So it worries me that chapter 8 of the Online Safety Bill does not differentiate "members of the public" by age or any other status. It also worries me that children in higher risk situations or with disabilities or other forms of structural disadvantage are little included in Ofcom's research. Nor have I heard much about how to tailor the media literacy curriculum for the "at risk" or "hard to reach" children who may need it most.

6. Media literacy initiatives must be evaluated. I welcome Paragraph (4), which requires Ofcom to "prepare guidance" "about the evaluation of educational initiatives" by those providing them – presumably the DfE, schools, and also providers of regulated services. Getting this right will be crucial. This is not about whether people enjoyed a media literacy campaign, or liked the colours of the website, or thought they had learned something.

What matters is whether actual harms are reduced (and actual benefits enhanced) as the consequence of a media literacy intervention. If this doesn't happen, attention must focus not only on any limitations of media education to change the public's understanding, and more on internet governance and the role of digital companies whose actions make problematic content, conduct, contact and contract risks accessible to children and the wider public in the first place.

So why is media literacy so prominent in the Bill?

It is worrying that the Bill contains no rationale for conjoining Ofcom's regulation of internet services *and* provision for media literacy. Ten years ago, I argued that media literacy, though a vital force in the digital world, risks becoming the fall guy for the difficulties of internet governance in a society divided about the form such governance should take. When online harms arise in practice, it often seems easier to conclude that the public's understanding and behaviour is at fault, rather than that of regulators or digital providers.

These two points are connected, especially when we consider the case that challenges internet governance most: children. Calls for internet regulation in the best interests of children are commonly countered with calls for more media literacy instead. Further, calls for media literacy for children are commonly transmuted into calls for children to be taught to be 'good' online, leaving unaddressed the bad actors online, individual and corporate.

So while it's excellent that the Bill calls for media literacy for children and the general public, let's attend to what kind of media literacy is on offer, and let's be careful not to shift the burden of responsibility from those creating and amplifying online harms onto their victims. Especially when the debates over regulating digital providers get tricky.

Watch the LSE Online Safety Bill briefing

Notes

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