

## **Ofcom's strategy and priorities for the promotion of media literacy - a response from the National Institute of Adult Continuing Education**

1. The National Institute of Adult Continuing Education (NIACE) works to encourage more and different adults to engage in learning of all kinds. Its functions include research, development and consultancy; advocacy to inform and influence public policy; information services and dissemination; campaigning for, and celebrating the achievements of, adult learners. Established as the British Institute of Adult Education in 1921, it is an independent non-governmental organisation, a registered charity (No. 1002775) and company limited by guarantee (No. 2603322). Its corporate and individual members come from all sectors concerned with adult learning: colleges; local authorities; universities; voluntary and community organisations; churches; broadcasters, employers and unions.
2. NIACE's broad aim is to advance the interests of adults as learners and as potential learners. Its strategic plan commits the organisation to "support an increase in the total numbers of adults engaged in formal and informal learning in England and Wales; and at the same time to take positive action to improve opportunities and widen access to learning opportunities for those communities underrepresented in current provision".
3. From its earliest years NIACE has recognised and valued the contribution that broadcasting makes to adult education: As long ago as the 1920's we were instrumental in establishing a joint Committee of Enquiry with the BBC, which produced the landmark Hadow Report (*New Ventures in Broadcasting* (BBC, 1928) which led to the formation of the Central Council for Broadcast Adult Education. More than 75 years later our interest remains as strong. This response is based largely upon a paper prepared by Professor Naomi Sargent and considered by NIACE's Board of Management in July 2004. We would be pleased to answer any questions prompted by this response. These should be directed, in the first instance to Alastair Thomson, Senior Policy Officer ([alastair.thomson@niace.org.uk](mailto:alastair.thomson@niace.org.uk)).

**Question 1: What is your view of Ofcom's proposed definition of media literacy?**

**Question 2: What do you consider to be the key role/s of media literacy in the UK?**

4. Media literacy is taking its place in the array of literacies increasingly recognised as necessary for participating actively in democracy or indeed in day-to-day life. Financial literacy is another current example. 'Literacy' is a term now widely used in relation to adults and the OED describes it as a 'condition in respect to education, especially the ability to read and write'. Transferring this concept to the electronic media adds the question of the range of the media and their different forms.

5. As the consultation paper rightly notes, there is as yet no single agreed definition as to what constitutes media literacy. The consultation paper makes a useful contribution to firming-up a definition but must remain provisional – firstly because the concept itself will continue to evolve, secondly because of the pace of change in information and communication technologies. NIACE is concerned especially that the language of media literacy should not be dominated solely by discussion of ‘skills’ and competences. Understanding and knowledge are equally important in our view. In its own thinking NIACE would describe media literacy at its simplest as *‘the ability to access, analyse and respond (critically) to and benefit from a range of media’*. There are two sides to be considered. The positive side is concerned with empowering people, giving people the opportunity to gain more from all the media in terms of education, information and entertainment and total communications potential. The negative side is concerned with protecting people, particularly children, from harmful, unwanted or inappropriate messages.
  
6. The ITC has already been running media literacy workshops aimed at teachers and care-workers etc involved in caring for and protecting people, particularly children and young people. Included in their discussions have been the internet, interactive digital TV and 3g mobile phones covering their general use, and with chat-rooms and messaging.
  
7. OFCOM was given the duty under the Communications Act 2003 to promote media literacy. This is described in the Act’s Explanatory Notes as follows:
 

*‘...to bring about increased public awareness and understanding of material published by the electronic media, the processes by which such material is selected or made available for publication, the available systems by which access to such published material can or should be regulated, and the available systems by which persons to whom such material is available may control what is received. OFCOM are also required the development and use of technologies and systems for regulating access to such material and for facilitating control over what is received. These could include internet filtering systems, rating systems by which, for example, programmes and videos can be given a classification which indicates the nature of their content, and other technical devices such as PIN-based systems to control viewing. Promotion of the use of such systems could include OFCOM participating in the development of related materials’.* (Explanatory notes on Section 11.)
  
8. Ofcom’s initial statement focused on ‘information about different kinds of regulatory environments and the protection they afford, as well as technological devices such as filters and screening systems’. (Ofcom, 2003). This view appears narrower than had generally been expected, being more to do with regulation and technology and less to do with access to and understanding of content or with issues of media literacy as a driver of participation in democracy and social inclusion. NIACE is reassured by the broader vision in this consultation paper. We believe that higher levels of media literacy have the potential to encourage greater levels of social inclusion and integration while lower levels heighten the risk of exclusion.

9. The Department of Culture, Media and Sport (DCMS) had produced a Media Literacy Statement (2001) in support of a general statement of policy on media literacy and critical viewing (and listening) skills laying emphasis on the 'ability to think critically about viewing... and to take greater responsibility for viewing choices and the use of electronic media.' While focusing mainly on content skills, they added a requirement for technical competence in terms of navigation skills for the new electronic media landscape and production content.

10. The BSC/ITC/NIACE working group (BSC (01)33) offered a working definition of media literacy as follows:

*'Media literacy exists when the user not only has access to a full range of electronic media, but is able to comprehend the choices available and evaluate them.'*

11. The literature review commissioned by the same working group focused specifically on the question *How media literate is the adult population in the UK?* and looked for empirical evidence for the levels of media literacy within the population, including the identification of gaps or inequalities in literacy. (Livingstone, with Thumim, 2003). Its conclusion was that *'In the context of these lively debates... and strong expressions of support for media literacy, it is undoubtedly both curious and disappointing that little empirical research on adult media literacy has been funded or conducted in the UK'*, noting that the majority of research has been to inform the debate about its place in the school curriculum and the resources available for it. Their text then offers helpful suggestions as to what may be involved in attempting to measure levels of media literacy: access as a prerequisite to literacy, informal/formal learning, existing curricula in audio-visual media/ICT etc and notes that much academic research is medium-specific despite increasing media convergence.

12. The review then returns to the issues of 'technical competencies': access and the ability to use the equipment, 'critical reception practices': to understand the content and view it critically, and actual 'content production' as the areas for assessment. While the Act covers all electronic media, television broadcasting is likely to be its public face initially as OFCOM is already engaged in a one-year review of public service television broadcasting and the DCMS has launched its consultation on the review of the BBC Charter. (NIACE has submitted evidence on both these issues.)

13. The tension underlying the Act is between negative regulation for control and prevention and positive regulation to enable and empower and to maintain and enhance, in particular in the first instance, public service broadcasting. There are also particular urgent issues about universal access and digital switchover since fewer older people have access to multi-channel TV and fewer older people as well as poorer people have access to the internet. Positive regulation is necessary to keep a generous and uncensored offering of on-screen broadcast provision. The digital divide tends to reinforce the learning divide.

14. In January 2004, Tessa Jowell, Secretary of State for Culture Media and Sport spoke at the first major seminar on the subject in January 2004, suggesting that the definition must embrace at least three different strands. NIACE supports her analysis:

*'First, that people must have the means to understand the potential of all the new communications technologies that are becoming available.....*

*( second) ... that it is the content delivered that matters to people. In particular people need to be aware of the way in which large corporations and other institutions use the media to promote their products and shape the way people see the world. .... So we want active informed consumers, able to take decisions for themselves based on judgment and understanding.*

*But, thirdly we recognise that people are more than consumers. They are citizens, and to be citizens they need to have an understanding of the world around them and how they engage with it. Most of the information they need to be able to act as informed citizens does actually come from the media. It's not only the big corporations that are sophisticated in their use of the media. The same could be said of political parties, pressure groups, NGO's and you might even say Government too.'*

15. As an organisation concerned with learning, argues that media literate people should be able to cope with new developments in that they should be able to transfer their relevant learning and experience to new technologies and applications, having the confidence and capacity to be independent learners. Without such transferable skills, they will depend upon training to cope with each and every change as technologies develop.
16. Overall, NIACE would urge Ofcom to place the broader citizens' interest at the heart of its approach to media literacy rather than a narrower technological model or a more limited consumer model.

**Question 3: Do you agree that each of the 3 proposed strands of work (Research, Connecting, Partnering & Signposting and Labelling) address an important element of the media literacy landscape?**

## **Research**

17. NIACE strongly supports the identification of research as an immediate priority. Much of the early work on media literacy has focused on the needs of children, schools and teachers. It is important to place the needs and interests of the adult population on the learning agenda. There is little existing research on adults' media literacy levels and there is a pressing need to try to bench-mark how media-literate adults are - and think they are. The difficulty of course is that the fuzziness of the term 'media literacy' means there is as yet no general understanding of the concept.

18. NIACE's own work suggests a number of immediate questions:
- a. Do people know what is available? What channels, programmes, services are available to people in their own homes/area, via what equipment? at what cost?
  - b. How do people find out about content/choose what they watch/hear/listen to/ find on the internet? From the daily papers, the Radio/TV times/the PVR/just turn on?
  - c. How and why do people choose the audiovisual technologies to adopt and which to defer?
  - d. Would classification help people make more informed choices? How could classification work effectively and efficiently to cover products that may appear over a number of different media?
  - e. Do they understand the techniques used to promote programmes? Can they differentiate between the different types of communications: commercial, factual, fiction, entertainment, political?
  - f. Do they understand how messages are constructed/may be manipulated? How necessary is it to know about production?
  - g. What role can the media themselves play in offering/understanding/and helping improve media literacy? How media literate are those working in the media?
  - h. How do people learn from the media?
19. NIACE has included some preliminary questions around these topics in its own Adult Participation research survey earlier this year (RSGB, February 2004) and this indicates:
- a. The continued importance of television: People spend well over 3 hours a day watching television on average. This is more than they spend on any other activity except sleeping and working (if they are in work). Eighty-seven per cent of women and 82% of men say they watch TV every day
  - b. Inequalities of access to technological devices continue to be an issue. The lack of access may be due to knowledge, geography, lack of interest, money or lack of information. For whatever reason, the information divide has implications for social inclusion. While just over half the population has access to the internet (51%) and 55% have access to multi-channel TV, there are major demographic differences between gender, age and social class groups. (see Table 1 below). Internet access is slanted to men, to the young and to the better off, and with a peak for parents of teen-age children. Most access to the internet is still via a pc and phonenumber and many older people are unlikely to choose this route.

- c. Distinct and separate from having access to devices is the matter of having the skills or competences in their use. While the (in)ability of adults to operate all features of mobile phones or PVRs is a modern cliché it illustrates that possession of a device should not be presumed to equate to mastery of it. In the case of PC's, awards such as the ECDL and CLAIT have been developed in response to bridge such a gap.
- d. It is not acceptable yet to assume, as much of the media already do, that everyone has immediate access to the internet and its associated interactivity. While the next generation of mobile telephones will include many of the functions of current PCs (including internet access) they may simply replicate and reinforce existing inequalities of access as such devices are marketed primarily to young people.
- e. Multi-channel TV access has a somewhat different profile: the groups with lower access are women, those aged 55 & over and the lowest social class (DE). Older people are far less likely to have multi-channel TV. (Table 1).
- f. While Freeview has offered a successful addition to digital choice, it is not available in all areas and the idea of FreeSat is still under discussion. There are serious consumer issues to be faced in relation to digital switch over.

Table 1- Proportion having access to the internet and to multi-channel TV

	<b>Internet access</b>	<b>No internet access</b>	<b>Multi-channel TV</b>	<b>No multi-channel TV</b>
<b>All respondents= 1949</b>	51	49	55	45
<b>Male</b>	56	44	60	40
<b>Female</b>	47	53	50	50
<b>Age:</b>				
<b>17-19</b>	70	30	68	32
<b>20-24</b>	55	45	57	43
<b>25-34</b>	65	35	65	35
<b>35-44</b>	68	32	66	34
<b>45-54</b>	60	40	57	43
<b>55-64</b>	42	58	49	51
<b>65-74</b>	23	77	40	60
<b>75 &amp; over</b>	6	94	25	75
<b>Social class:</b>				
<b>AB</b>	80	20	60	40
<b>C1</b>	65	35	57	43
<b>C2</b>	48	52	62	38
<b>DE</b>	25	75	46	54

RSGB Omnibus Feb 2004

Percentages are horizontal

## Connecting, Partnering and Signposting

20. The first two of these topics are central challenges for Ofcom and NIACE is pleased that the consultation paper makes an explicit mention of the potential of Adult Learners' Week in paragraph 53. We look forward to working with Ofcom in this respect. Increasing the public's understanding of how the media communicates and how it works would, we believe, be sufficiently relevant and important enough as a theme to encourage/challenge broadcasters to join in and contribute appropriate innovatory and stimulating educational or educative programming, probably under some coordinating umbrella.
21. As an early contribution to development, we set out in tables 2 and 3 below, an initial analysis of topics for media literacy – recognizing that they are likely to be amended and refined. NIACE believes that media literacy may, in time, be recognized as an additional basic skill and we are keen to be part of discussions about the sort of curriculum entitlement required and responsibility for its delivery.

Table 2: Initial topics for media literacy

Topics	Areas	Issues	Solutions
Technical access	Consumer knowledge of availability and choice Technical knowledge	Barriers to access: Signal availability Rural access to broadband Cost Ignorance of services Eg Digital	Advertising Consumer Help-lines Consumer ability to control Ability to filter out
Technical skills	Ability to make competent use of devices	Speed of innovation and obsolescence Sheer range of devices available	Education and training provided by manufacturers and others
Cultural access	Knowledge and awareness of programming Individual choice and habits	Provision of information Censorship	Classification/labeling
Protection of minors		Ability to filter out Regulation eg watershed	Parent education Teacher education
Media-savvy? How not to be conned.	Critical viewing/viewing styles. How do people view?	How to encourage critical / choosy viewing	(HE) research into viewing habits and learning from the media.
Are people media-literate enough?		What is enough? The place of 'rational ignorance'	More research is required
The age divide?		Imbalance of internet access Imbalance of multi-channel access	Promote adequacy of choice

Table 3: Media Literacy – Roles and responsibilities

<b>Roles / Responsibilities</b>			
	<b>Areas</b>	<b>Issues</b>	<b>Solutions</b>
<u>Government and nations</u>	Active democracy Informed citizens Social inclusion Skilled people	Access to equipment and training for adults	Extend use of libraries as media centres for access and adult learning
<u>DfES/QCA</u>	Develop curriculum Train teachers Provide technology Teach children to use technologies	Extend media studies qualifications to include media literacy.	Develop a basic qualification in media literacy? On-line assessment on demand On-line access to information, advice and guidance
<u>Post-school/FE (inc. adult learning)</u>	Develop skills curriculum Train FE teachers	Making media literacy a priority for development	Develop media studies provision More blended learning and internet access
<u>Higher Education/ ESRC</u>	Train teachers Train researchers	How to develop e-learning effectively	Research into media literacy and how to teach it via the media!

**Question 4: Are there any specific areas which you consider to be a priority that we have not considered here as part of our early media literacy work?**

22. NIACE believes that the Ofcom strategy would be enhanced by including a more detailed analysis of the relationship between people’s age and their levels of media literacy, their use of and decisions about how and whether to adopt particular technologies or platforms. We suspect that this may be a significant factor in shaping attitudes and behaviours. How this age variable interacts with that of social class should also be a subject for further investigation. Table 1 (above) illustrates the demographics.

**Question 5: What do you think are the types and levels of media literacy skills necessary to enable citizen-consumers to effectively manage and enjoy the opportunities offered by new communication technologies? How do these differ for particular sectors of society?**

23. Central to this are the levels of access that different groups have to various media. As long as some people are not even at the starting line, it is hard to say how long the list of necessary skills should be. NIACE would not be comfortable with an impressive and exhaustive list of skills and levels if these could not be made available to ALL who wish to acquire them. Our primary concern is that Ofcom should prioritise the achievement of a national minimum entitlement. This is of particular importance if government is moving towards a presumption that its own dealings with citizens will increasingly use ICT media. Nobody should be left behind because they are poor or old or live in the wrong part of the country. We need to raise the floor before we start raising the ceiling. As a consequence, we would favour a narrower definition of ‘media literacy’ at present (perhaps excluding the mastery of technical detail of content creation over different media) in order to ensure universal access. To illustrate: it was enough for J.K. Rowling create Harry Potter on the printed page – she did not have to create the film, the computer game on PC, the website or the mobile ring tone. In understanding people’s behaviours and attitudes it is necessary to appreciate that “rational ignorance” is a powerful and understandable position to take.

**Question 6: What do you see as being the key barriers to achieving appropriate levels of media literacy in the UK?**

24. Having made the point (above) about a national minimum level of media literacy which should be the entitlement of all, NIACE believes that it will be necessary for society to agree, through consultation and debate, a shared understanding or agreement about what might constitute an ‘appropriate’ level of media literacy for any segment of the population above the minimum level. This may, in turn lead to a question about the degree to which levels of media literacy are a matter of private choice or of wider public concern (as is the case for an ability to read a piece of written text for example).
25. Given the readiness of some sections of the population to demonise ‘Media Studies’ in general (ignoring the fact the subject has an above average record both of graduates finding employment and using skills from their studies in their employment), it is likely that a significant barrier to the development of wider media literacy may be sections of the mass media themselves! (If the cultural desirability of “watching telly” or “surfing the net”, is felt to challenge the value of reading a particular canon of literature or attending live performances of drama and dance, the likelihood of negative press headlines is depressingly predictable!)

**Question 7: Should any of the following groups with potentially particular needs in relation to media literacy feature as a priority for Ofcom’s work in media literacy and why?**

**Vulnerable children**  
**Vulnerable adults**  
**Disabled people**  
**Elderly people**  
**People on low income**  
**People in different parts of UK**  
**People from different ethnic communities**  
**People living in Rural areas**  
**People living in Urban areas**

26. At present it is not clear why the media literacy of any one group of adults should be given a higher priority than another – although each of the groups identified may require sensitive, distinctive and appropriate treatment for their particular needs and concerns. NIACE recognizes, for example, that:

- People on low incomes will face particular access issues;
- People with disabilities will have a variety of DIFFERENT needs. We believe it is crucial not to consider “disabilities” as a single category – disabilities affecting digital dexterity, hearing, sight and mobility all present distinctive issues of access and need that go beyond adaptive technologies;
- People with relatively low levels of achievement in other literacies may be multiply disadvantaged – and require high and enduring levels of support if they are not to be excluded.
- There may be a strong case for prioritising the idea of FreeSat services because of the difficulties of extending coverage of Freeview across the whole UK;
- Multichannel broadcasting offers the potential of serving diverse communities of interest – including different ethnic and linguistic communities although NIACE believes that a primary role of public service broadcasting is to bring different groups together – uniting them in the shared and common aspects of their UK culture.

To re-state our earlier position: Ofcom’s concern should be to encourage the provision of opportunities to bring the entire adult population of the country up to an agreed minimum level of knowledge, access and skills.

**Question 8: Are there any other areas in which you feel that Ofcom should be conducting research in order to inform its media literacy work?**

27. NIACE believes that Ofcom should maintain an active research role in monitoring and anticipating how technological convergence may reshape the delivery of media services and associated patterns of useage across the population. Despite the real difficulties, it should endeavour to ‘future-proof’ its media literacy strategy. This is likely to require some consideration of how the ability of digital media content to cross national regulatory boundaries can best be handled.

**Question 9: What are the key initiatives, projects or resources that Ofcom should have regard to in promoting media literacy?**

28. An important consideration for Ofcom as it plans a media literacy strategy is to build upon existing projects, initiatives and networks where these are successful and to avoid unnecessary duplication. In doing this, Ofcom will want to assess which initiatives and approaches inspire trust across the range of stakeholders and which are best-placed to mediate new ideas and activities. As the co-ordinators of Adult Learners’ Week, NIACE would be pleased to discuss how best this well-established promotional vehicle could contribute to any work programme. Ofcom may also wish to explore the potential of online learning developments in HE, FE and the workplace (including the Open University, the commercial Phoenix Online University and corporate universities – for example that of Lloyds TSB).
29. In order to promote media literacy effectively, NIACE believes that Ofcom might also give consideration to:
- a. Recognising the potential synergies that could arise from close co-operation with the Learning and Skills Council’s National Learning Network initiative to develop the use of e-learning across post-16 education
  - b. the encouragement of content creators to develop programming which includes the offer of access to skills;
  - c. the encouragement of manufacturers of devices to educate and be educated by consumers in matters of useability;
  - d. the experience of learndirect in developing learning;
  - e. pro-active support for centres offering public access to technology (especially the public library service and UK online centres as well as colleges and other educational institutions) to offer opportunities for adults to raise their media literacy levels
  - f. the ‘ICT as a Skill for Life’ standards available from QCA – and the development of an associated curriculum. These may offer models for development.

**Question 10: Do you support the need for a common labelling system for audiovisual content?**

30. NIACE believes that a common labelling system is well worth investigating but it should not be seen as essential. Any system will need to be publicized widely if it is to be understandable in itself – and its main usefulness will be limited to pre-recorded material rather than live transmissions.

**Conclusion**

31. NIACE welcomes this consultation and has been heartened by the role that Ofcom has taken to date both in making its own research available and in providing a forum within which other researchers can share research approaches and findings. We strongly encourage Ofcom to continue to take this lead.

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**NIACE  
20 Princess Road West  
Leicester  
LE1 6TP**

## Annexe to consultation paper response

### **ADDITIONAL MATERIAL FROM NIACE's MEDIA SURVEY (RSGB, February 2004)**

1. NIACE's formal response to the consultation concerning Ofcom's strategy and priorities for the promotion of media literacy makes reference to the findings of a quantitative survey undertaken commissioned from RSGB Ltd and undertaken in February 2004.
2. This annexe contains further headline findings extracted from this research and is included to contextualize our response. NIACE can make further information about survey methodology and findings available to Ofcom on request.

#### **Cultural choice**

3. People have to know what is available and care enough to action personal choice. Little systematic work appears to have been done as to how people find out what programmes are being transmitted and how they decide what to view. These issues become more important as there is increased choice and complexity of provision, much of it involving increased cost. Respondents were asked 'How do you usually find out about what's going to be on TV?'. The main sources are:

<i>From a daily/Sunday paper</i>	35%
<i>A paid for TV guide e.g. Radio Times</i>	24%
<i>Electronic Programme Guide</i>	20%
<i>A free weekly viewing guide</i>	17%
<i>Don't bother/just turn on</i>	11%
<i>Friends/family/work</i>	4%

4. Newspapers are most important for all the age-groups aged 45 and over. The electronic programme guide is most important for the younger age-groups up to 45. The newer aids (TVO and PVR) rank at 1% or less.
5. In an attempt to discover how 'choosy' viewers are, respondents were offered a number of statements about their viewing choices. Over one-third (38%) did not plan in advance. This response makes clear the importance of the 'order' of the electronic programme guide.

<i>I tend to choose when I see what is on that day</i>	38%
<i>I have my favourite regular programmes and don't watch much else</i>	36%
<i>I tend to switch around a lot when I am watching</i>	28%
<i>I like to plan my viewing well in advance</i>	12%
<i>I just watch the same channel</i>	7%
<i>I just watch what other people have decided to watch</i>	7%

6. Twelve per cent more men say they tend to switch around than women, and 12% more women say they have their regular programmes. However, there are fewer differences between age-groups and social class groups than one might expect.

**Viewer satisfaction with choice and variety**

7. Respondents were asked how satisfied they were with the amount of choice and variety offered on their channels. Seventy per cent were very or fairly satisfied with 29% ‘not satisfied’. Men were the most dissatisfied (33%) along with one-third of *all* the groups aged 45 and over. There are interesting differences between the 3 nations with 71% of English respondents being very or fairly satisfied, dropping to 65% in Wales and 60% in Scotland. The proportions who are ‘very satisfied’ (14%) is far too low for comfort. To have over half (51%) the respondents stating they are only ‘quite satisfied’ offers broadcasters a warning. Even those with multi channel choice record 25% as being dissatisfied.

**Annexe Table 1. Satisfaction with choice and variety on existing channels**

	Total	No multi-channel television	Any multi-channel television
Very satisfied	14	9	17
Fairly satisfied	56	53	58
Not very satisfied	22	27	18
Not at all satisfied	7	10	5
Don't know	1	1	1

8. The higher levels of dissatisfaction among older people is to be noted. Older people are also the ones who are less well served through the internet, and little new digital programming has been aimed at them though there are now more people over 60 than under 16. It will be important not to build up a new age divide.