Media Literacy Toolbox

ERGA Action Group on Media Literacy

Contents

List of acronyms

AVMSD – Audiovisual Media Services Directive

EDMO – European Digital Media Observatory

EDAP – European Democracy Action Plan

EPRA – European Platform of Regulatory Authorities

ERGA – European Regulators Group for Audiovisual Media Services

ML – Media Literacy

MIL – Media and Information Literacy

MLEG – Media Literacy Expert Group

MAAP – Media and Audiovisual Action Plan

NRAs – National Regulatory Authorities

SID – Safer Internet Day

VSPs – Video-Sharing Platforms

Media Literacy Toolbox for Video-sharing Platforms[1]

1. Context

The revised AVMSD[2] in its recital 59 introduces the concept of the ML as the "*skills, knowledge and understanding that allow citizens to use media effectively and safely. In order to enable citizens to access information and to use, critically assess and create media content responsibly and safely, citizens need to possess advanced Media Literacy skills. Media Literacy should not be limited to learning about tools and technologies but should aim to equip citizens with the critical thinking skills required to exercise judgment, analyse complex realities and recognise the difference between opinion and fact. It is therefore necessary that both media service providers and video-sharing platforms providers, in cooperation with all relevant stakeholders, promote the development of Media Literacy in all sections of society, for citizens of all ages, and for all media and that progress in that regard is followed closely.*"

Additionally, Article 28b(3)(j) of the Directive prescribes that VSPs provide: "*for effective Media Literacy measures and tools and raising users' awareness of those measures and tools.*"

Sub-section (5) of the same article further states that "*Member States shall establish the necessary mechanisms to assess the appropriateness of the measures referred to in paragraph 3 taken by video-sharing platform providers. Member States shall entrust the assessment of those measures to the national regulatory authorities or bodies.*"

Article 30b of the AVMSD further clarifies that one of the tasks of ERGA is to "*to exchange experience and best practices on the application of the regulatory framework for audiovisual media services, including on accessibility and Media Literacy*".

Furthermore, Article 33a states that "*Member States shall promote and take measures for the development of Media Literacy skills.*"

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[1] For the preparation of the Media Literacy Toolbox several stakeholders were consulted, including representatives of VSPs in a dedicated workshop, young representatives of the BIK Youth Ambassadors in a dedicated session during the 2021 EU Media Literacy Week and experts of the MLEG.
[2] https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018L1808&from=SK

The MAAP[3] committed to the development of a Media Literacy toolbox. According to the MAAP, this is to be developed in cooperation with ERGA and "*in dialogue with VSPs*"[4].

The EDAP[5] provided further clarification on how closely ML skills and efforts to combat mis- and disinformation are interconnected. The European Commission in EDAP commits itself to increase efforts to strengthen ML in cooperation also with EDMO[6] and the Commission's MLEG.

Improving ML is also one of the commitments of the CoP[7] under the section dedicated to empowering consumers. Signatories of the Code committed '*to partner with civil society, governments, educational institutions, and other stakeholders to support efforts aimed at improving critical thinking and digital Media Literacy*'. In its Guidance on Strengthening the Code of Practice on Disinformation[8] published in May 2021, the Commission acknowledges the efforts of the signatories in the area of ML and at the same time asks them to continue particularly to strengthen the "*involvement of the Media Literacy community in the design and assessment of Media Literacy campaigns on their services, including to protect children. These efforts could also be aligned with the Commission's initiatives in the area of Media Literacy, including the new Digital Education Action Plan (2021-2027)[9], to exploit relevant synergies*."

In that context, ERGA identified the development of a proposal for a Media Literacy Toolbox for VSPs as a key deliverable for the work of the Action Group on Media Literacy for 2021. The Toolbox was then listed in the Group's Terms of Reference. The Toolbox is outlined further below.

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[3] https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020DC0784&from=EN

[4] For the preparation of the Media Literacy Toolbox several groups of stakeholders were consulted, including representatives of video-sharing platforms in a dedicated workshop, representatives of the Better Internet for Kids Youth Ambassadors in a dedicated session during the 2021 EU Media Literacy Week and experts of the Media Literacy Expert Group.

[5] https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020DC0790&from=EN

[6] https://edmo.eu/

[7] https://digital-strategy.ec.europa.eu/en/policies/code-practice-disinformation

[8] https://digital-strategy.ec.europa.eu/en/library/guidance-strengthening-code-practice-disinformation

[9] https://ec.europa.eu/education/education-in-the-eu/digital-education-action-plan_en

2. Framework for the Media Literacy toolbox

It is clear that VSPs have for some years engaged in a variety of ML initiatives[10]. Their activities in the area of ML, a significant number of which are captured in the 2020 EPRA report[11], include a mix of technology-led initiatives (e.g., content labelling and prominence, behavioural nudges and service design, resources, advertising transparency) as well as funding, partnerships and events and campaigns. Content labelling and giving prominence to a fact-checked content is often undertaken in accordance with the platforms' own policies for combatting mis- and disinformation. Behavioural nudges include notifications for users who are about to share content already labelled as misleading. A number of VSPs also provide resources to users to increase their knowledge on how to have a safe and positive experience with their products. These resources are most often offered to children, educators and/or parents.

Other mechanisms include advertising transparency which includes informing users that the content promoted to them is paid for by a third-party and why is it shown to them (generally on the basis of user preferences as determined by algorithms). Finally, a number of platforms also offer partnerships or funding for ML-related projects and events organized by third-party organisations (often non-profit), and they also run ML awareness raising campaigns, either on their own or together with local partners.

While all these ML initiatives have value and are generally helpful to users, these appear to be delivered in an ad hoc fashion, without strategic planning from the platforms' perspective, in the absence of a platform policy framework for ML, with no apparent prior assessment of users' needs and without visibility from (NRAs) or other relevant partners. Therefore, enhancing visibility and transparency on any ML strategy, policy, data or research conducted by platforms themselves would significantly enhance the value of VSPs' ML initiatives and strive for higher level transparency and effective evaluation of their successes.

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[10] See following reports providing non-exhaustive lists of ML initiatives of the VSPs:
- Reflections on Video-Sharing Platforms' promotion of Media Literacy under the Audiovisual Media Services Directive from EPRA's Media and Information Literacy Taskforce, https://cdn.epra.org/attachments/files/3922/original/VSP_MIL_AVMSD_Reflections_EPRA_final.pdf?1612170140
- Improving Media Literacy Campaigns on Disinformation, https://erga-online.eu/wp-content/uploads/2021/01/ERGA-SG2-Report-2020-Improving-Media-Literacy-campaigns-on-disinfor-mation.pdf
- Baseline transparency reports of the signatories of Code of practice published within thee monitoring and reporting programs set out in the Joint Communication "Tackling COVID-19 disinformation - Getting the facts right" https://digital-strategy.ec.europa.eu/en/library/first-baseline-reports-fighting-covid-19-disinformation-monitoring-programme

[11] Reflections on Video-Sharing Platforms' promotion of Media Literacy under the Audiovisual Media Services Directive from EPRA's Media and Information Literacy Taskforce, https://cdn.epra.org/attachments/files/3922/original/VSP_MIL_AVMSD_Reflections_EPRA_final.pdf?1612170140

3. Implementation of six key principles of Media Literacy initiatives

This section offers potential implementation of the six key principles of ML which aim to identify best practice in the design, delivery and implementation of all ML initiatives, including the Media Literacy Toolbox. A non-exhaustive illustrative list of examples of implementation of the key principles is provided. Each of the examples is accompanied with further details of the benefits for VSPs, users/citizens, NRAs and other relevant actors.

Transparency

Transparency is one of the guiding criteria in implementing and developing ML initiatives. Transparency is critical because it enables trust. The aims, scope and resources of a ML initiative should be clearly and transparently available to users, recipients (or parents and guardians where applicable), and also experts, academics and NRAs. Effective tools for increasing transparency include making available data and information on the following:

- The goals and aims of the initiative
- Final results or evaluation (including where previous experience or best practice have inspired the initiative)
- The target age group to which it is addressed
- The geographical reach
- The language used
- The tools and technologies used;
- Any "brand ambassadors" used for ML campaigns, (e.g. bloggers, influencers, actors, etc), including disclosure of monies paid for those services
- The duration of the initiative (with start and end date)
- The subjects involved in the organisation of the initiative
- The number of users actually reached
- An outline of all advertising and marketing provided to support the initiative
- Clarity on the provenance and levels of funding

VSPs should consider providing greater transparency and visibility on their ML initiatives. Actions which could support greater transparency could include:

1. **Designation of a single point of contact for each Member State between NRAs and VSPs with decision-making powers and the ability to share information.**

In general, a single point of contact between VSPs and their stakeholders is highly desirable. It promotes more transparent, consistent and open communication channels between VSPs, NRAs, academics, researchers and other stakeholders. Also, it allows for more effective networking of other relevant actors on a national level and therefore lead to better reach and impact of the ML initiative. These communication channels could also be used for ML troubleshooting purposes. At the very minimum however, NRAs must have clear, consistent and easily accessible channels of communication with each VSP for all matters relating to ML.

2. **Transparency of decision-making when promoting/delivering a ML initiative: communicate why this initiative, how much funding was allocated and anticipated benefits for the platform.**

Information about why a particular ML initiative was launched in a specific country is currently not publicly available and it is often unclear what are the intended audiences and goals of the initiative. This is both at odds with the Transparency principle and the Localisation principle (see further information below). Users and NRAs alike would greatly benefit from understanding why a particular initiative is available in one country and not its neighbour for example.

Focus on the user and citizen

The principle of focusing on the user/citizen places the user at the centre of all measures to promote ML. The aim is to increase the chance that the ML message reaches the users, is understood by them and has a real impact on their actions, understanding, and/or well-being.

Therefore, when designing ML measures, it is crucial that the individual needs of the target audience are taken into account:

- Diversity: Users are different, so the ML measure must also address different needs, different abilities and take socio-cultural factors into account
- Content: The content should be designed with a focus on the needs of the user reflecting their own experiences in daily life
- Formats: Initiatives should reflect the formats with which they best serve the needs of users. This can be done through different offline and/or online features like one to one, helpline, trainings, print, audio, video, games etc.
- Language: The language chosen should take into account the following aspects in relation to the users: quantity (bite size vs. detailed background information), legibility, addressing on an equal footing etc.
- Communication: Message and communication channels must fit the respective target group

Media Literacy initiatives that articulate this focus should include:

1. **Taking ML standards into account**

In the absence of an overarching strategy or framework at the national level, scientific and practice-tested standards should be taken into account when designing an ML initiative to meet the needs of the users. In this context, trusted sources such as UNESCO's Media and Information Literacy Policy and Strategy Guidelines should form a useful and consistent framework for the development, delivery and/or implementation of VSP-led ML initiatives.

2. **Provide information and resources at the point of contact with the user.**

It is accepted that VSPs by their nature have unique access to interactions with their users on a one-on-one basis. Technology-led initiatives such as content labelling and behavioural nudges have already been deployed by some platforms in the case of content identified as mis- or disinformation and fact-checked by an independent third-party fact-checking organization. These are good examples of how ML initiatives can be delivered at the primary point of contact between VSPs and their users.

Yet, ML is much broader than the fight against disinformation. ERGA is of the view that initiatives should also support users' individual ML though the development of their critical thinking, their ability to access these resources simply and straightforwardly and the availability of answers to users' questions. From a VSP perspective, such initiatives can support enhanced transparency, and also help build user trust, so it is unclear why such approaches have not been deployed on a much wider basis. From a user perspective, it provides clarity, reassurance and also enables informed decision-making, all of which contribute to a more media literate citizen.

3. **Provide users with transparent and simple mechanisms for complaints and other corporate engagement.**

A clear, simple, easily accessible and usable complaints process for VSPs' users is necessary from a good governance perspective. However, a strong complaints process can also serve as a key ML tool, in that it enables users to articulate their issues with clarity and understand the decisions made on these complaints. ERGA is therefore of the view that all users should have a simple, visible and transparent mechanism to lodge any type of complaints against a VSP, whatever the nature of the complaint. Again, the transparency of such mechanism helps build trust between users and platforms, so ERGA is of the view that such a process would be of great benefit to platforms and would enhance transparency, as well as user engagement.

More generally, transparent and simple mechanisms for users to engage with platforms are also required, and particular attention and care should be paid to the needs of users with disabilities. VSPs should ensure that all processes of engagement between users and the platform (including a Complaints process) are made accessible for users with disabilities.

It should be noted that these themes of greater transparency and easier access for users of platforms are the subject of ongoing discussions across the spectrum of the ERGA work programme. For example, the Disinformation Sub-Group reports and the proposals contained in the position paper ERGA published on the Digital Services Act all call for greater transparency and easier access. These continue to be regular themes of engagement with VSPs, and the Action Group on ML's proposals are thereby aligned with other ERGA work.

Reach

ML initiatives can target audiences in different ways: they can vary between initiatives with great breadth, or with more depth, or sometimes, a combination of the two.

- Breadth: there are broad ML initiatives that target a major chunk of population, or indeed an entire population. Public awareness campaigns are a key example.
- Depth: other ML initiatives can target a very specific demographic or community and focus on drilling deep into that community instead of providing a wide access. Typically, such initiatives run over a medium- to long-term period or may involve the development of new skills. Community broadcasting, (radio and television), have long delivered such initiatives.

Both approaches deliver value for their recipients, but because of their different focus, have different outcomes. Best practice suggests that for ML initiatives to be impactful, a combination of depth and breadth should be sought. This may mean that the delivery of ML initiatives should seek to have both breadth and depth. An example of this could be a campaign encouraging children to mind their privacy online, accompanied by work on the ground with local and representative organisations enabling workshops, classroom interventions and community awareness events on the same issue. Such an approach would combine breadth and depth and deliver a potentially much more impactful set of initiatives.

Additionally, and regardless of the approach used, the reach of a ML initiative can be measured quantitatively through for example, the level of visibility the initiative generates, the number of users it targets, or the aim of its message.

A number of applications of the principle are presented below.

1. **Provide data and analytics detailing the reach of ML initiatives delivered/supported by VSPs. Include breadth (e.g., number of participants), and depth (e.g. profile of participants).**

VSPs have at their disposal a large store of analytical methods to assess user preferences and engagement with the platforms. It is evident that these methods can also be applied to assessing the impact of any VSP ML initiatives. On that basis, ERGA is of the view that a significant amount of data on any initiatives

run by VSPs is available and that platforms should aim to make available detailed data and analytics relevant for the independent assessment of their ML initiatives to NRAs, academics and researchers as well as other relevant ML actors in each Member state. Such data should reflect both on what is the expected goal of the initiative, including target groups to be reached, as well as assessment of initiative already delivered in terms of reach, in as much detail as possible or available, including for example profile of targeted groups or participants, aggregate user behavioural data, and other key analytical data. ERGA is of the view that making such data available to NRAs and academics is a very effective way for platforms to validate their work in an independent manner, provided the availability, quantity and quality of the data can be independently verified.

2. Use the reach of the VSP´s platform to increase the reach of the ML initiative

In order to increase the reach and awareness of ML initiatives, the original reach of the platform itself should also be used. It stands to reason that if a particular initiative can be deployed in a particular country, it can be deployed to all the users from that country, provided the deployment is not led by algorithmic choice. Using the reach of the VSP to increase the reach of an ML initiative also includes a prominent placement or distribution of ML measures on the platform, available to all users. This is of benefit to VSPs themselves in that they can use their significant reach to communicate their ML efforts to their entire audience.

Multi-Stakeholder aspect

Collaboration and partnership between different ML stakeholders have long been identified as an essential element for the delivery of successful ML projects. Considering the wide-reaching, cross-sectoral interest in ML issues (including but not limited to issues of disinformation, online child safety, or data protection), there is in most countries a large number of stakeholders already involved in the promotion of ML from the following sectors: Media; Education; Commercial; Digital Intermediaries; Civic society; and Government / Public Sector. Indeed, in some countries, multi-stakeholder networks have a statutory basis and are set up as distinct authorities.

Delivering collective projects with a number of stakeholders is likely to have numerous benefits for all parties. Firstly, it strengthens partnerships. Secondly, the quality of the initiative is likely to improve, since the Multi-Stakeholder aspect enables the addition of external expertise. Thirdly, the potential for spreading information and interest for the initiative is increased through the Multi-Stakeholder aspect.

In short, the Multi-Stakeholder aspect:

- Contributes to increase dissemination of ML initiatives
- Fosters long term projects
- Enhances quality of content
- Fosters a common approach
- Facilitates access to funds

A number of applications of the principle are presented below.

1. **Work in partnership with key organisations at local level**

ERGA welcomes the fact that VSPs are already working with partners on a local level in a number of countries. However, there appears to be a lack of coordination between VSPs themselves, and with partner organisations on the ground. Implementing ML initiatives in the various Member States together with local key stakeholders will allow for more effective tailoring of the initiatives, including identifying correctly the most important target groups and their needs, to maximize their reach and allow for third-party assessment of their success.

2. **Provide funding and other support to local organisations involved in ML**

In addition to close cooperation or coordination with national ML actors, including local organisations, providing funding or other support to them in developing and implementing their own activities would allow for even more localised and therefore better targeted campaigns. Here again, transparency, focus on the user/citizen and localisation are required in order to maximise opportunities for local organisations working in the field of ML.

3. **Work with NRAs**

NRAs have an important role to play in supporting ML initiatives, whether these are developed by VSPs or any other relevant actors in their respective countries. NRAs can support the rollout and the engagement with stakeholders to enhance the Multi-Stakeholder aspect for ML initiatives of VSPs. In that context, VSPs should communicate their ML plans to the competent regulator or body in advance, work with local networks, and generally greatly enhance their multi-stakeholder engagement. It is understood and accepted that not all NRAs in the EU-27 have legal competences with regard to ML, though it should be noted that the effective transposition of the AVMSD requires that NRAs assess the appropriateness of ML measures and initiatives put in place by VSPs. Here again, cooperation with NRAs, through ERGA and through existing ML networks will provide support for NRAs in this role.

Evaluation

Because ML is a lifelong learning process, evaluation of ML skills is understandably a challenging operation. Even more complex is the evaluation of the impact of an ML initiative. Nevertheless, Evaluation remains a key principle for best practice when dealing with ML and when delivering an ML initiative. Evaluation can have a qualitative focus, a quantitative focus or both. Evaluating qualitative aspects of ML can ensure consistency and it is therefore important that all ML initiatives – including that carried out by VSPs – have an evaluation component.

While it is accepted that it is difficult to evaluate the impact or success of ML initiatives, it is nevertheless best practice to seek appropriate evaluation and assessment mechanisms for ML initiatives. In that regard, the work undertaken by Nordic NRAs in partnership with local stakeholders and experts (in Denmark, Finland, Iceland, Norway and Sweden) is important and reflects best practice, and we look forward to an opportunity of discussing it further. In the meantime, the application of the Evaluation principle by VSPs can be done in the following ways:

1. **Provide information about any and all evaluation methods and findings used when delivering ML initiatives**
    Evaluation being a crucial part of ML initiatives, transparency of methods employed and of its findings is paramount for gathering lessons learned for all involved actors, including VSPs, users, NRAs and others. It is understood that the evaluation of ML initiatives is a complex process and that no common European framework for ML evaluation currently exists. However, best practice still requires evaluation of elements of the initiatives if it is not practicable to evaluate the whole, and also requires the sharing of that evaluation process with a view to foster learning and development among ML actors, and transparency for users.

2. **Enable external evaluation of VSP ML initiatives**
    Independent review, validation and/or analysis of the data by academics and researchers will contribute significantly to more effective evaluation of ML initiatives, better quality initiatives on the ground and to further building the trust between platforms and their users. Providing access to this information and to all data to researchers and academics is required in order to support external and independent evaluation of ML initiatives carried out by VSPs. It is the view of ERGA that only ML experts are in a position to clearly assess the quality and the impact of an ML initiative and that such assessment is best carried out independently of the provider of the initiative.

Localisation

Europe is a vast, ancient continent with a breadth of cultures, histories and languages. Within the various treaties framing the European Union, this has long been valued and reflected in the celebration of cultural identities and languages.

With regard to ML, it stands to reason that the recognition of the uniqueness of a particular country or region, language or community should be integrated in the design, delivery and implementation of a ML initiative. While national and local actors have long been doing this, it is admittedly more challenging for VSPs. However, in order to ensure fairness and effectiveness, it is imperative that ML initiatives be using local languages, and relevant and accessible formats to ensure that the other principles above (notably reach, focus on the user and transparency) are met.

A number of applications of the principle are presented below.

1. **Modelling of ML initiatives on national strategy/policy/ML competency framework if available**
   When and if a Member State has a national strategy or a policy for ML in place, VSPs should have a knowledge of (this can be achieved through the single point of contact for instance) and should make use of it. Such strategy or policy is highly likely to have been developed with expert input and therefore reflects ML best practice. VSPs' ML initiatives should therefore be modelled on such strategy or policy to deliver best practice, maximise impact and contribute to building relations with local/ national ML actors and networks. It should also be noted that aligning VSP ML work to existing national policy or strategy frameworks serves to emphasise greater transparency, Multi-Stakeholder aspect and focus on the user/citizen. The principles are inter-connected and inter-dependent and should therefore be taken as a whole.

2. **Provide access to ML resources in local formats and local languages to maximise the impact of ML initiatives**
   Many ML initiatives developed and implemented by VSPs in the past were only implemented in a limited number of languages, most prominently in English. Localisation also means providing a local context for the initiatives as this leads to much greater reach and impact on users targeted by the campaigns, as well as catering for the diversity of European users. Additionally, access to ML resources should be provided to all users bearing in mind their particular needs and ensuring in particular that people with disabilities are appropriately and equally catered for.

4. Conclusions

The six key principles listed above provide a useful and flexible framework to any VSP's ML initiative as they help identify the application of best practice. For maximum impact, the principles must work together. The principles are meant to be flexible to acknowledge the various differences between VSPs make-up and aims. They are also adaptable and can therefore apply to initiatives with various partners, but also to initiatives designed by VSPs themselves and at the point of interface with the user (i.e., on the platform itself).