



Sara Winter  
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7<sup>th</sup> July, 2004

Dear Ms Winter,



***Ofcom's strategy and priority for the promotion of media literacy***



Thank you for inviting our comments on your consultation document, the generality of which we wholeheartedly support. Every modern consumer-citizen already needs, and ought to have, a high level of media literacy. As greater media convergence develops, such skills will become even more important and valuable, not just to the individual but, through the individual, to society as whole.



Having said that, media literacy skills will nonetheless clearly be of little use if you do not have access to the devices which, in turn, can provide access to the materials you are meant to be literate about, be they newer and technologically based, or of the more traditional kind. Our organizations often work with some of society's most marginalized and disadvantaged young people and their families, so these digital and other material divides remain a major focus for our work.



We entirely share the view that education and awareness are the strongest pillars on which to construct a media literacy policy, and we also agree with the view you express in para 17 about the importance of people taking more responsibility for what they and their children see or experience online. Such a view is often advanced as being in conflict with a call for more and better technical tools which can help parents or others to control access to the internet or the amount of time spent on it. This is not how we see things. Both approaches have a valid, and sometimes complementary, part to play, perhaps especially in households with younger children or with other vulnerable users.

Moreover not all parents are anyway equally capable of assuming the sort of responsibility you discuss, be that because they have limited financial means at their disposal or because they have a limited understanding of the issues. Yet their children still need internet access and civilized society still has a responsibility towards them.

It seems clear to us that we have to break with the old idea that the internet is an adult medium where special measures are needed to make provision, or make allowances, for children's occasional or intermittent use. On the contrary, it is now well established that children and young people are major internet users, if anything they are disproportionately or over represented.

Perhaps we need to establish in UK domestic law that the internet is just such a mixed environment, more akin to a high street than a night club, and that home pages are therefore public spaces, analogous to shop windows.

We note that this is exactly the approach that has been adopted by the UK's six major mobile phone companies in relation to their Code of Practice on Content, and we very much applaud it. We think other analogous businesses e.g. those retailing PCs into the domestic market, should follow suit. So far only one PC manufacturer has chosen to do this, and that is Comet. But if Comet can do it, so can the others.

We note your disclaimer of any statutory powers in relation to the internet. However, implicit in the discussions on the Communications Bill in Parliament, was the notion that, should Ofcom become convinced that the internet industry was failing to make reasonable and timely progress in terms facilitating effective parental controls in relation to internet access, or in terms of developing greater media literacy in relation to the internet among parents, that you could go back to ask the Secretary of State to give you new powers or directions. We trust that you will remind the different players of this fact at appropriate moments.

Finally we note your proposals in relation to labelling. Naturally we approve of them and, mindful of the point we made above about convergence, we can see a case for them working across any and all digital media.

The only additional point we would make, and we apologise for the fact that it is an obvious one, is that because the internet is a global medium it would clearly be to everyone's advantage if whatever emerged from this area of activity could also work internationally and therefore cross-culturally. For it to be of any real value in modern Britain it would anyway be very important for it to be able to reflect the values of, and be useful to, a very broad range of culturally distinct groups so these two strands of policy dovetail together quite nicely.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'John Carr', written in a cursive style.

John Carr  
Secretary