Media Literacy

The following article:

Media Literacy: No Longer the Shrinking Violet of European Audiovisual Media Regulation?

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Foreword

Continuous learning is a well established concept to guarantee that graduation from school or university does not mark the end of studying the subjects related to one's profession. The more an area of knowledge is apt to change the bigger the need to stay on one's toes. Training on the job is certainly another way to handle the challenge but depending on the sophistication of the issues it may turn out to be a dead end.

Continuous learning is also a must for staying abreast with the audiovisual services offered by today's media. However, the difference between training for the job and training for using media is that many of us already lack basic education in how to handle the technical equipment, how to use interactive services and how to access the desired content. Sadly, an incapacity to use correctly today's media entails risks ranging from not finding what we are looking for to accessing harmful content to generating unwanted bills for the services used. Even worse, lacking the necessary technical media skills excludes us from a significant part of today's life because more and more it is the media which determine our world of entertainment, knowledge and daily services.

Not surprisingly, media literacy has risen to be a new star on the European policy horizon. But it is still a long haul for the new born favourite to win any European contest as the lead article of this IRIS *plus* nicely demonstrates. First of all, the potential disciplines where media literacy must be achieved are numerous and they require focusing on different societal groups, developing different learning methods and seconding them with the appropriate funding as well as possibly the institutional and legal framework. For example, we must be media literate in order to make informed choices about what media to use, to be critical towards the content displayed and to fully enjoy the potential of interactive services. "Learning to use media" is different for children and the elderly, for private and professional users, for physically disadvantaged persons. Acquiring a certain level of media literacy might be costly if countries run special programmes and this could be facilitated by coherent classification or warning systems across media and across borders. Soft laws or hard rules might be needed to work towards bringing different approaches together or to get media literacy even started.

The lead article of this IRIS *plus* provides an initial exploration of different theoretical approaches to media literacy and it familiarises you with different normative pillars and settings used by European legal instruments upon which actions to promote media literacy

might be built. The related reporting section presents recent national developments that are likely to impact issues related to media literacy or that aim at fostering media literacy related activities. The Zoom section goes into the details of one concrete example chosen to show how a programme aimed at increasing media literacy can look.

The question remains when all or most of the European countries will have established a permanent basis for continuous learning schemes that ensure an adequate understanding of the functions, opportunities and risks of audiovisual media services.

Strasbourg, May 2011

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Media Literacy:
No Longer the Shrinking Violet of European Audiovisual Media Regulation?

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I. Introduction

Media literacy is very much in the ascendant in European regulatory and policy-making circles at the moment. For instance, the European Commission is due to formally report – for the first time – on media literacy levels in all European Union (EU) member states by the end of 2011. The report, provided for by Article 33 of the EU's Audiovisual Media Services Directive, is being awaited with much anticipation.

The title of this article[1] poses the central question it will address: in light of relevant recent regulatory and policy developments, can it now be argued that media literacy has lost its shrinking-violet status in the regulatory framework governing the European audiovisual media sector?

The article will commence with a brief exploration of selected theories surrounding media literacy. More precisely, it will canvas the main rationales for promoting media literacy, definitional issues, and the groups centrally implicated in media literacy initiatives – both as target groups and as other stakeholders. The article will then identify, contextualise and scrutinise the key reference points for the promotion of media literacy in the European audiovisual regulatory and policy frameworks. Both the EU and the Council of Europe have adopted a number of (legally-binding and policy) instruments that aim to improve media literacy levels across Europe. Finally, the article will consider the prospects for the future development of media literacy within European regulatory structures.

II. Theoretical approaches

1. Rationales

Different rationales are advanced for the promotion of media education or literacy. According to some experts, a coherent rationale could be developed if governments were to prioritise "the three P's of sound Public Policy":

• "Provision of media education for all their citizens;
• Participation of all their citizens in social, cultural and economic activities, and
• Protection of all citizens in need (either because of their age, their disabilities or their income)."[2]

While a coherent overarching rationale might be welcome from a theoretical perspective, its absence should not and does not hamper the development of media literacy in practice. Indeed, the diversity of rationales underpinning media literacy is instructive insofar as it captures the different, cross-sectoral, multi-stakeholder interests involved.

For the purposes of this article, the main rationales for promoting media literacy have been selected and organised as follows:

• civic participation/empowerment;[3]
• bridging the digital divide;
• risk reduction/protection from harmful content;
• informed decision-making/consumer protection.

The relevance of these (groups of) rationales becomes more evident after having summarised the essence of what media literacy is and involves, i.e., a critical, civic activity with important technological and ethical ramifications.[4] Many summaries exist, including the following one:

> "Learning to analyze news and advertising, examining the social functions of music, distinguishing between propaganda, opinion and information, examining the representation of gender, race and class in entertainment and information media, understanding media economics and ownership, and exploring ways in which violence and sexuality are depicted in media messages continue to matter as important life skills. With the rise of digital media, there are a range of important new media literacy skills, where we must consider issues of personal and social identity, the complex interplay between what's private and what's public, and legal and ethical issues. The powerful conceptual framework of audiences and authors, messages and meanings, representations and realities can deepen students' reflexivity, critical thinking, and communication skills".[5]

A powerful participatory rationale underpins media literacy. Drawing on the foregoing citation, media literacy can be described as "a prerequisite for full participation in late modern society, involving as it does the critical skills of analysis and appreciation of the social dynamics and social centrality of media as framing the cultures of the everyday".[6] It empowers individuals and enables them to participate more fully in democratic society, which is increasingly reliant on media and information and communication technologies (ICTs).

The aim to reduce or eliminate the digital divide stems from the realisation that access to digital resources and the ability to use them effectively is empowering in political, economic, social and cultural terms. Disadvantage in terms of digital capacity can therefore create new societal divisions or exclusions or exacerbate existing ones.

Analytical, evaluative and technological skills are required to protect against, and minimise the risk of adverse consequences from, exposure to harmful media content. These skills facilitate the

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2) Divina Frau-Meigs & Jordi Torrent, "Media Education Policy: Towards a Global Rationale", in Divina Frau-Meigs & Jordi Torrent, Eds., *Mapping Media Education Policies in the World: Visions, Programmes and Challenges*, (New York, The United Nations Alliance of Civilizations in co-operation with Grupo Comunicar, 2009), pp. 14-21, at p. 20.

3) For a rich exploration of relevant issues, see generally: Ulla Carlsson, Samy Tayie, Genevieve Jacquinot-Delaunay, José Manuel Pérez Tornero, Eds., *Empowerment Through Media Education: An Intercultural Dialogue* (Gothenburg, Sweden, Nordicom, 2008).

4) Roger Silverstone, "Regulation, media literacy and media civics", 26 *Media, Culture & Society* (No. 3, 2004), pp. 440-449, at p. 447.

5) Renee Hobbs & Amy Jensen, "The Past, Present, and Future of Media Literacy Education", *Journal of Media Literacy Education* 1 (2009), pp. 1-11, at p. 9

6) Roger Silverstone, "Regulation, media literacy and media civics", *op. cit.*, at p. 448.

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making of "informed choices when using the Internet and other ICTs by using and referring to diverse media forms and content from different cultural and institutional sources; understanding how and why media content is produced; critically analysing the techniques, language and conventions used by the media and the messages they convey; and identifying media content and services that may be unsolicited, offensive or harmful".[7] Similarly, by facilitating informed decision-making about media content, these skills can also enhance awareness, alertness and consumer protection.

The process of forging a definition of media literacy necessarily draws on the rationales and objectives of media literacy. The consideration of its objectives sometimes includes an itemisation of the competences that media literacy seeks to develop, like in the Preamble to the EU's Audiovisual Media Services Directive (see further, below), or in the civil society initiative that culminated in the drafting of the European Charter for Media Literacy. According to this Charter, media-literate people "should be able to":[8]

- Use media technologies effectively to access, store, retrieve and share content to meet their individual and community needs and interests;
- Gain access to, and make informed choices about, a wide range of media forms and content from different cultural and institutional sources;
- Understand how and why media content is produced;
- Analyse critically the techniques, languages and conventions used by the media, and the messages they convey;
- Use media creatively to express and communicate ideas, information and opinions;
- Identify, and avoid or challenge, media content and services that may be unsolicited, offensive or harmful;
- Make effective use of media in the exercise of their democratic rights and civic responsibilities.

In the same vein, some experts refer to "the 6 C's of the Competences for media education: Comprehension, Critical Capacity, Creativity, Consumption, Citizenship and Cross-Cultural Communication".[9]

The integration of the many diverse elements discussed in this section into a definition of media literacy is no easy task, as will duly be explained.

2. Definitional difficulties

On the back of the foregoing general introduction, it is useful to dwell on the question of how media literacy is defined, because, as noted by a leading authority on the subject, Sonia Livingstone, that "has consequences for the framing of the debate, the research agenda and policy initiatives".[10]

The term, media literacy, has so far proved somewhat resistant to fully consensual definition.[11] It means different things to different people and in different sectors. As Livingstone notes, "confusion" tends to arise when a given term is used "across diverse disciplines".[12] There is not even agreement on the superiority of the term to other adjacent terms, like media education or even media literacy education. Different terms, reflecting different priorities, rationales and emphases, have been in vogue during different periods of scholarship and policy-making.[13] Whereas terminological choices usually result from considered calculation, they can also, on occasion, result from the convenience

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7) Council of Europe Committee of Ministers Recommendation CM/Rec(2007)16 (see further, below).
8) The European Charter for Media Literacy, no date, para. 2, available at: http://www.euromedialiteracy.eu/charter.php
9) Divina Frau-Meigs & Jordi Torrent, "Media Education Policy: Towards a Global Rationale", *op. cit.*, at pp. 20-21.
10) Sonia Livingstone, "Media Literacy and the Challenge of New Information and Communication Technologies", 7 *The Communication Review* (No. 1, 2004), pp. 3-14, at p. 5.
11) For a "sampling" of scholarly and civil society definitional approaches to the term, media literacy, see: W. James Potter, "The State of Media Literacy", *Journal of Broadcasting & Electronic Media* 54(4), 2010, pp. 675-696, at pp. 676 *et seq*.
12) Sonia Livingstone, "Media Literacy and the Challenge of New Information and Communication Technologies", *op. cit.*, at p. 5.
13) For an overview, see: Renee Hobbs & Amy Jensen, "The Past, Present, and Future of Media Literacy Education", *op. cit.*

of convention. For the purposes of this article, the term media literacy will be used as consistently as possible because it is the term preponderantly used in key regulatory texts at the European level.[14]

The difficulty in defining the term, media literacy, stems partly from its compound nature: it comprises two discrete terms, each of which is definitionally resistant in its own right. A recurrent question in scholarship and in policy-making circles concerns the scope of the term media. Increasingly, in the context of media literacy (at least), it is taken to be an inclusive term, covering all types of media. In light of the contemporary reality of media convergence, an inclusive understanding of *media* seems logical. An integrated approach to *media literacy* would therefore also seem logical: "With the rapid growth of ICTs and the resulting convergence of new and traditional media, it is necessary that media and information literacy be considered holistically and applied to all forms of media, regardless of their nature and the technologies used".[15]

Nevertheless, partly in recognition of the different functionalities of the plethora of media operating today, it is debatable whether a unified form of "literacy" can be considered appropriate. Distinctions are frequently made between media, digital and other types of literacy (e.g. search engine literacy).[16] These distinctions reflect, amongst other things, the different nature and functionality of various media types. Following this horses-for-courses logic, it can be argued that different literacies are required. As will be seen below, there is a marked tendency in European-level regulatory and policy-making circles to accentuate the need for literacy in respect of digital or online media, due to the newness, relative complexity and unfamiliarity of the underlying technologies for many people. This implies that strategies to develop literacy have to engage with the relationship between technology and media dynamics, uses and effects.

It is also useful to prise open the term literacy and group the main understandings of the term. Some approaches emphasise the primary aim of media literacy as being to increase skills, build knowledge, or both.[17] Media literacy is also perceived of as an activity or as a "political, social, and cultural practice".[18] It will be recalled from the previous section, that media literacy can also be described as a critical activity and a civic activity with moral underpinnings.[19]

Notwithstanding all of the aforementioned definitional difficulties, a definition of media literacy has been developed and widely endorsed, in academic, regulatory and policy-making circles. Drawing on the work of others, Livingstone synthesises "media literacy" as "the ability to access, analyze, evaluate, and create messages in a variety of forms".[20] These four components of the definition point to: (i) the natural affinity of media literacy with questions of technological access to media content; (ii) the centrality of critical, i.e., analytical and evaluative, skills needed to interpret and process media content, and (iii) the complementarity of first-hand experience of production and content-creation as a learning tool to enhance relevant critical competences.[21] Livingstone describes this as a "nonlinear, dynamic learning process" in which each component supports the others: "Learning to create content helps one to analyze that produced professionally by others; skills in analysis and evaluation open the doors to new uses of the Internet, expanding access,

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14) See, for example, the Audiovisual Media Services Directive (footnote 31, below).

15) Abdul Waheed Khan, "Foreword", in Divina Frau-Meigs & Jordi Torrent, Eds., *Mapping Media Education Policies in the World: Visions, Programmes and Challenges*, *op. cit.*, pp. 9-10 at pp. 9-10.

16) The inclusion of search engine literacy as a sub-set of media literacy is currently under discussion within the Council of Europe: Draft Recommendation on the protection of human rights with regard to search engines, Committee of Experts on New Media, Doc. No. MC-NM(2010)004, 11 March 2010, Section VI. Media literacy, para. 13. This draft text recently featured in a public consultation exercise: http://www.coe.int/t/dghl/standardsetting/media/default_en.asp.

17) W. James Potter, "The State of Media Literacy", *op. cit.*, at p. 679.

18) *Ibid.*, p. 680.

19) Roger Silverstone, "Regulation, media literacy and media civics", *op. cit.*, at p. 447.

20) Sonia Livingstone, "Media Literacy and the Challenge of New Information and Communication Technologies", *op. cit.*, at p. 5.

21) For a detailed exploration of the interface between media literacy and user-generated content from a broadcasting perspective, see: Martin Scott, *Guidelines for Broadcasters on Promoting User-Generated Content and Media and Information Literacy* (Commonwealth Broadcasting Assocation & UNESCO, 2009).

and so forth".[22] Very significantly, the definition of media literacy relied upon by the European Commission closely resembles Livingstone's synthesised definition (see further, below).

3. Key target groups and constituents

Bearing in mind the four main rationales for the promotion of media literacy, outlined above, a number of target groups can be identified: children/minors; adolescents; parents; the public; the elderly; the disabled; linguistic minorities; the socially and economically deprived; media users; consumers; etc.

There is a clear tendency to prioritise children/minors (and parents – by virtue of their relationship to children). The protection and empowerment aims underlying that prioritisation sometimes also include adolescents. Relevant strategies tend to focus on both formal, informal (e.g. in the home) and non-formal (e.g. awareness campaigns outside of school and the home) education.

When measures promoting media literacy target other groups, strategies often differ. For instance, when targeting general members of the public, lifelong/ongoing and non-formal educational measures are likely to be preferred to formal educational measures. The public is, however, a very diffuse term. It can therefore be useful to identify particular subsets of the public as having a heightened need to acquire media literacy. The elderly, the disabled and those suffering from socio-economic disadvantage are all recognised as having particular needs in respect of the various components of the definition of media literacy and based on the various rationales for promoting media literacy in the first place: civic participation/empowerment, reduction of (informational) inequalities, protection, informed decision-making.

It is important to observe and reflect upon the extent to which the specific needs of these groups are meaningfully catered for by existing regulatory and institutional frameworks, processes and initiatives to promote media literacy at European and national levels. This question will be revisited, after having examined the approach taken by the European Union and the Council of Europe, in the section, "Outlook", below.

Media literacy has a broad constituency that extends well beyond its most obvious target groups. Stakeholders typically include: regulatory authorities; policy-makers; administrative authorities; media organisations and professionals; educational institutions and professionals; civil society interest groups, etc. The involvement of stakeholders stretches from the international level to the most local of levels. The roles of stakeholders vary enormously, depending on the nature of a given measure, its aim(s) and target group(s), the context in which it is employed, etc.

An excellent illustration of the multiplicity and interconnectedness of themes, target groups and stakeholders, is provided by *Mediawijzer.net*. It has developed a Media Literacy map or so-called *Mediawijsheidkaart* (it is an adaptation of the London Underground Map, with stakeholders[23] dotted along the main thematic lines, often intersecting: see image below).[24] This map is divided into three main sections, each of which is divided into sub-sections (see legend below).

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22) Sonia Livingstone, "Media Literacy and the Challenge of New Information and Communication Technologies", *op. cit.*, at p. 5.
23) The stakeholders featuring explicitly on the map are: children, youth, parents, teachers, leaders, civil society, elderly, media professionals, everyone/citizens, the socially disadvantaged.
24) The *Mediawijsheidkaart* is a part of *Mediawijzer.net* and available at: http://www.mediawijzer.net/?q=node/2746 ; created by the *Stichting Nederland Kennisland* and *Verdonck, Klooster & Associates*, it is licensed under Creative Commons Attribution-NonCommercial-ShareAlike 3.0 licence: http://creativecommons.org/licenses/by/3.0/nl/deed.en

The target groups, *inter alia* children, parents, the elderly, and the socially disadvantaged, form the stops. By clicking on the stops, the user is transferred to the relevant information linked to the specific target group and sub-category.
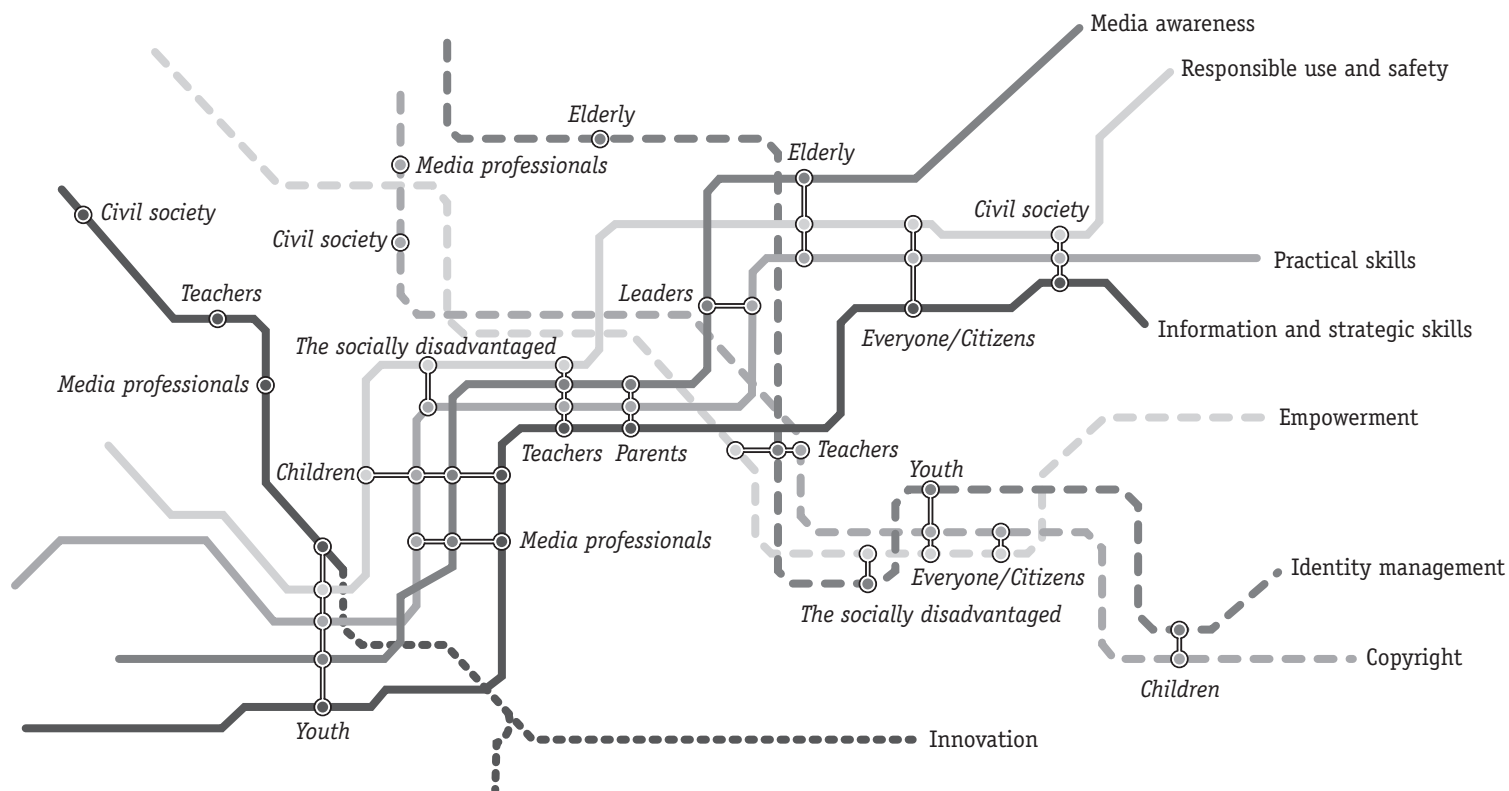
THEMATIC LINES:

Media use & creation

━━━━━ Information and strategic skills

━━━━━ Media awareness

━━━━━ Practical skills

━━━━━ Responsible use and safety

Social participation

━ ━ ━ ━ Identity management

━ ━ ━ ━ Copyright

━ ━ ━ ━ Empowerment

Innovation

•••••• Innovation

TARGET GROUPS:

Primary groups:
• Children
• Youth
• Parents
• Teachers

Secondary groups:
• Everyone/Citizens
• Civil society
• Media professionals
• Elderly
• The socially disadvantaged
• Leaders

III. Normative approaches at the European level

It is important to note the particular (de-)regulatory context in which the promotion of media literacy has recently come to the fore in Europe. The promotion of media literacy has traditionally often been coupled with the aim of preventing or minimising "negative media effects".[25] This explains its prominence in the broader policy discourse about the protection of minors, especially in an online environment.[26] It also explains the EU's promotion of media literacy in respect of commercial communications (see below).

The emergence of the promotion of media literacy as a policy and regulatory goal has also coincided with strong deregulatory trends. In such a context, educational measures are presented as alternatives to regulation. Writing in 2004, Roger Silverstone opined that "[v]ery little critical attention ha[d] been given either to [media] literacy or [media] civics as an alternative to the blunderbuss of media regulation, or to the possibility of developing an ethical agenda which would inform such a project".[27] More recently, regulatory emphases on media literacy have been criticised by various expert commentators as being proxies for content regulation seeking to minimise the effects of harmful media content.[28] The criticism is that the promotion of media literacy has been used to make the deregulatory thrust more palatable to those concerned about the protection of individual fundamental rights and interests. The onus for the prevention of harm is shifted, the argument runs, from public institutions to the private sphere. Jackie Harrison and Lorna Woods capture the dilemma well when they observe that:

> "reliance on information technology and the viewer not only changes the relationship between the viewer and the regulatory system but may result in some viewers failing to make active choices, instead relying on the default positions programmed in by the technology. Regulation has been devolved to the viewer, but in this instance, in effect, returns to an industry player. An industry player, however, might not have primary regard to the public interest (which is at least what regulators claim to do) or to the needs of citizen viewers".[29]

Silverstone's enthusiasm for media literacy as an alternative to regulation and scepticism about the manner in which media literacy is currently being promoted in regulatory frameworks are not necessarily mutually exclusive. What Silverstone had in mind was a well thought-out, multi-stranded approach, to be developed progressively. The criticism of the current regulatory approach that media literacy has been devised as a quick fix in an accelerated deregulatory process does not rule out the suitability of a well-calibrated approach promoting media literacy. That goal is a real and legitimate challenge for the future development of the media literacy agenda, as will be discussed below. Meeting that challenge head-on requires an appreciation of the potential *and* limitations of media literacy. It has been noted, for instance, that "moves to foster critical media literacy will not, of themselves, be enough to eliminate the various detrimental aspects of content provision, such as gratuitous violence in the media, the breach of consumer rights by media services, the lack of authenticity and validity, and manipulation".[30]

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25) W. James Potter, "The State of Media Literacy", *op. cit.*, p. 690.
26) Note, for example, the centrality of the goal of promoting media literacy in the European Commission's Safer Internet Programme (see: http://ec.europa.eu/information_society/activities/sip/index_en.htm) and in the work of the thematic network funded by that Programme, EU Kids Online II (see: http://www.eukidsonline.net) as well as in the Recommendation of the European Parliament and the Council of 20 December 2006 on the protection of minors and human dignity and on the right of reply in relation to the competitiveness of the European audiovisual and on-line information services industry (2006/952/EC), OJ L 378/72 of 27 December 2006. Annex II to the Recommendation also sets out practice-oriented "Examples of possible actions concerning media literacy" (IRIS 2006-3/7).
27) Roger Silverstone, "Regulation, media literacy and media civics", *op. cit.*, p. 447.
28) Divina Frau-Meigs, "L'éducation aux medias est-elle nécessaire? A quelles conditions?", *Les e-Dossiers de l'audiovisuel,* INA Sup, January 2011, available at: http://www.ina-sup.com/node/1591 ; Brian O'Neill, "Current policy developments in European media literacy", 6 *International Journal of Media and Cultural Politics* (No. 2, 2010), pp. 235-241, at p. 237.
29) Jackie Harrison & Lorna Woods, *European Broadcasting Law and Policy* (Cambridge, Cambridge University Press, 2007), p. 241.
30) Opinion of the Committee of the Regions on regional perspectives in developing media literacy and media education in EU educational policy, OJ C 141/16, 29 May 2010, para. 18.

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1. European Union

Audiovisual Media Services Directive

In the Introduction to this article, it was hinted that recent regulatory developments have been decisive in altering the perceived status of media literacy in the European regulatory framework. A major regulatory development was the explicit inclusion of media literacy in the Audiovisual Media Services Directive (AVMSD).[31] Alongside the AVMSD, media literacy has been steadily growing in prominence on the EU agenda in recent years, and in particular the agendas of the European Commission, European Parliament, Council of the European Union and Committee of the Regions.

The term, "media literacy", is introduced and partially explained in Recital 47 of the Preamble to the AVMSD:

> "'Media literacy' refers to skills, knowledge and understanding that allow consumers to use media effectively and safely. Media-literate people are able to exercise informed choices, understand the nature of content and services and take advantage of the full range of opportunities offered by new communications technologies. They are better able to protect themselves and their families from harmful or offensive material. Therefore the development of media literacy in all sections of society should be promoted and its progress followed closely. The Recommendation of the European Parliament and of the Council of 20 December 2006 on the protection of minors and human dignity and on the right of reply in relation to the competitiveness of the European audiovisual and on-line information services industry [footnote omitted] already contains a series of possible measures for promoting media literacy such as, for example, continuing education of teachers and trainers, specific Internet training aimed at children from a very early age, including sessions open to parents, or organisation of national campaigns aimed at citizens, involving all communications media, to provide information on using the Internet responsibly."

The introduction and explanation are heavily coloured by relevant EU priorities. The Recital underscores the potential of media literacy to "allow consumers to use media effectively and safely", enable "people" to "exercise informed choices", and better enable them to "protect themselves and their families from harmful or offensive material". These examples of the value of media literacy together prompt a call for its development to be promoted in "all sections of society".

Recital 47 also calls for progress in the development of media literacy to be "followed closely" and thereby sets up a new reporting obligation for the European Commission. The obligation is provided for in the first sentence of Article 33 of the Directive, as follows:

> "Not later than 19 December 2011, and every 3 years thereafter, the Commission shall submit to the European Parliament, to the Council and to the European Economic and Social Committee a report on the application of this Directive and, if necessary, make further proposals to adapt it to developments in the field of audiovisual media services, in particular in the light of recent technological developments, the competitiveness of the sector and levels of media literacy in all member states."

The cyclical nature of the envisaged reporting should facilitate a close following of progress in the development of media literacy across member states, but scant – if any – information is publicly available about the details of the reporting process. It can perhaps be assumed that the Study on Assessment Criteria for Media Literacy Levels, a major study commissioned by the European Commission, will inform the reporting process.[32]

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31) Directive 2010/13/EU of the European Parliament and of the Council of 10 March 2010 on the coordination of certain provisions laid down by law, regulation or administrative action in member states concerning the provision of audiovisual media services (codified version), OJ L 95/1 of 15 April 2010.

32) Study on Assessment Criteria for Media Literacy Levels: a comprehensive view of the concept of media literacy and an understanding of how media literacy levels in Europe should be assessed, Final Report, Coordinators: Paolo Celot/EAVI *et al.*, October 2009. For details, see: http://ec.europa.eu/culture/media/literacy/studies/index_en.htm

Commission Communication

The European Commission adopted its Communication, "A European approach to media literacy in the digital environment", in December 2007.[33] The European Parliament had earlier called on the Commission to adopt a Communication on education in media.[34] The adoption of the Communication also followed the establishment of an Expert Group on Media Literacy and a public consultation on media literacy in 2006.[35]

The Communication states that media literacy is "generally defined as the ability to access the media, to understand and to critically evaluate different aspects of the media and media contents and to create communications in a variety of contexts".[36] As already mentioned, above, this definition resonates with the definition synthesised by Sonia Livingstone, thereby making for a measure of consistency across academic and policy approaches at the European level. The Communication states that a "European approach to media literacy should relate to all media" and identifies various levels of media literacy: "feeling comfortable with all existing media"; "actively using media"; "having a critical approach to media"; "using media creatively"; "understanding the economy of media and the difference between pluralism and media ownership", and "being aware of copyright issues which are essential for 'a culture of legality'".[37]

An important section of the Communication, entitled "Media literacy in the digital environment – good practices", concentrates on three focus areas: commercial communication, audiovisual works and online. The three focus areas are designed to organise and group relevant priorities.

The Communication concludes by calling on member states to:[38]

- encourage greater involvement by the authorities in charge of audiovisual and electronic communication regulation in the improvement of the various identified levels of media literacy;
- "promote systematic research into and regular observation of and reporting on the different aspects and dimensions of media literacy";
- "develop and implement codes of conduct and, as appropriate, co-regulatory frameworks in conjunction with all interested parties at national level, and promote self-regulatory initiatives".

The Communication was welcomed by the Council of the European Union as "a further building block to European audiovisual policy".[39] The Council endorsed the Commission's linking of media literacy to "active citizenship in today's information society".[40] It recognised the diversity of efforts undertaken in member states to promote media literacy and the importance of identifying and promoting relevant best practices, partly against the absence of "common criteria and indicators for measuring media literacy".[41] The importance of education, training and teacher-training are also recognised. Finally, the Council invited member states to take further action, echoing the three conclusions of the Communication, and additionally emphasising the need for a multi-stakeholder approach, the usefulness of awareness-raising strategies and the desirability of integrating media literacy into lifelong learning strategies.[42]

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33) A European approach to media literacy in the digital environment, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, COM(2007) 833 final, 20 December 2007.
34) Report on the transition from analogue to digital broadcasting: an opportunity for European audiovisual policy and cultural diversity (2005/2212 (INI)), European Parliament Committee on Culture and Education (Rapporteur: Henri Weber), Doc. No. A6-0075/2006, 23 March 2006, para. 9.
35) For details, see: http://ec.europa.eu/culture/media/literacy/act_prog/consultation/index_en.htm
36) A European approach to media literacy in the digital environment, *op. cit.*, p. 3.
37) *Ibid.*, p. 4.
38) *Ibid.*, pp. 8-9.
39) Council conclusions on a European approach to media literacy in the digital environment, OJ 2008/C 140/08, 22 May 2008, para. 1.
40) *Ibid.*, para. 2.
41) *Ibid.*, para. 3.
42) *Ibid.*, para. 7.

Commission Recommendation

The Commission's Recommendation on media literacy in the digital environment for a more competitive audiovisual and content industry and an inclusive knowledge society, adopted in 2009,[43] follows the same definition of media literacy as the Communication.[44] The essence of the Recommendation is directly addressed to member states and the media industry – and surprisingly, perhaps, not the educational sector, as such. The recommendations for member states are envisaged as being "in cooperation with the authorities in charge of audiovisual and electronic communication regulation and in collaboration with supervisory data protection authorities where appropriate". The recommendations focus on co- and self-regulatory initiatives, continued research, educational measures (including lifelong learning) and awareness-raising activities. For their part, the recommendations for the media industry focus on information-provision and awareness-raising strategies.

Like the Commission's Communication, the Recommendation elicited a number of responses from other EU bodies. The Conclusions of the Council of the European Union on media literacy in the digital environment[45] welcomed the Recommendation and stressed as additional considerations, *inter alia*: the multi-dimensional nature of efforts to promote media literacy (including self- or co-regulatory initiatives); the relevance of different levels of access to, and understanding of, media and new communicative technologies and the relevance of different educational models for promoting media literacy.

It also recognised one of the key ambiguities about the development of media literacy: while it is clear that it "is a dynamic and evolving concept and that common understanding of the concept is affected by cultural, technological, industrial and generational differences, it is also clear that, with the development of a global internet as a key part of the communications infrastructure, the citizens of Europe and of the rest of the world are increasingly facing and living in a media landscape with similar features".[46] As such, the progressive development of criteria to assess levels of media literacy in member states should also reflect differentiated approaches at state-level.

European Parliament

The European Parliament provided a very structured and detailed examination of media literacy issues in its 2008 Resolution on media literacy in a digital world.[47] It first inventorised key European and international (e.g. UNESCO) regulatory and policy reference points for media education and literacy. It then placed media literacy and its importance in current-day societal and communicative contexts, before setting out key principles for the promotion of media literacy. Among the key principles, there is attention for the role of regulatory authorities for audiovisual and electronic communications to cooperate at various levels to improve media literacy (levels) as part of a broader multi-stakeholder approach involving the development of codes of conduct and common regulatory initiatives.[48] A wide range of stakeholders are identified: journalists, broadcasters and media organisations, as well as, importantly, "libraries, adult education centres, citizens' cultural and media centres, further education and training establishments and citizens' media (e.g. community media)".[49] A call is made on the Commission, in the context of Article 33, AVMSD, to devise media literacy indicators "with a view to fostering media literacy in the EU in the long term".[50] The critical,

43) C(2009) 6464 final, 20 August 2009. See http://ec.europa.eu/culture/media/literacy/docs/recom/c_2009_6464_en.pdf
44) See, *ibid.*, para. 11.
45) 27 November 2009. **http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2009:301:0012:0012:en:PDF**
46) *Ibid.*, p. 3.
47) European Parliament resolution of 16 December 2008 on media literacy in a digital world (2008/2129(INI)).
    http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P6-TA-2008-0598+0+DOC+XML+V0//EN
48) *Ibid.*, para. 4.
49) *Ibid.*, para. 6.
50) *Ibid.*, para. 7. Note: in the original text, reference is made to Article 26, AVMSD – the operative provision prior to the
    publication of the official consolidated text of the Directive.

communicative and creative skills inherent in media literacy are dwelt upon,[51] before its importance for intellectual property rights, consumer information, democratic participation and the promotion of intercultural dialogue is noted.[52]

A focus on aims and target groups followed, and then an exploration of access questions and educational angles, e.g. in schools, as part of teacher-training and for the elderly. One of the specific listed aims of media education is to "shed light on copyright aspects of media use and on the importance of respecting intellectual property rights, in particular regarding the Internet, as well as on data and privacy security and the right of informational self-determination".[53]

The Committee of the Regions

The Committee of the Regions, one of the EU bodies to whom the Commission's Communication was formally addressed, has also responded to the Communication and engaged in other ways with issues surrounding media literacy.

In its Opinion on "Media Literacy" and "Creative Content Online",[54] the Committee stressed that the reporting exercise envisaged under Article 33, AVMSD,[55] and other related activities "must allow for the differences and progress made in media literacy at regional level in Europe and provide examples of good practice by local and regional authorities and other stakeholders". It underscored the vital role that can be played by local and regional authorities in developing educational and other collaborative projects on media literacy, targeting a variety of groups, "especially children and young people, the disabled and social groups that are at risk of exclusion".

In its Opinion on regional perspectives in developing media literacy and media education in EU educational policy,[56] the Committee reaffirmed the role of local and regional authorities in respect of media literacy. It also stressed the importance of media literacy from a consumer-rights perspective. It also tapped into one aspect of the debate outlined in Definitional Difficulties, above, by highlighting that "a clear and substantive distinction must be made between the main components of media literacy, because the development of each component requires its own strategy, players and resources".

Miscellaneous developments

Finally, three recent developments which are likely to influence the future promotion of media literacy within the European Commission also deserve mention: (i) the conclusion of the activities of the Media Literacy Expert Group; (ii) the transfer of responsibility for the development of media literacy from the Commission's Directorate-General for Information Society and Media to its Directorate-General for Education and Culture, and (iii) the explicit inclusion of "Enhancing digital literacy, skills and inclusion" as a key prong of the Commission's Digital Agenda for Europe.[57]

(i) Following requests by the European Parliament,[58] industry players and a number of member states, the European Commission established the Media Literacy Expert Group: [59]

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51) *Ibid.*, para. 8.
52) *Ibid.*, para. 9.
53) *Ibid.*, para. 14.
54) 8-9 October 2008, CdR 94/2008 fin.
55) Again, in the original text, reference is made to Article 26, AVMSD, which was previously the operative provision.
56) OJ C 141/16, 29 May 2010.
57) See further: http://ec.europa.eu/information_society/digital-agenda/index_en.htm
58) For example, in: Report on the transition from analogue to digital broadcasting: an opportunity for European audiovisual policy and cultural diversity (2005/2212 (INI)), European Parliament Committee on Culture and Education, *op. cit.*
59) This text is taken from the (former) Expert Group's webpage:
   http://ec.europa.eu/culture/media/literacy/act_prog/expert_group/index_en.htm

"to analyse and define media literacy objectives and trends, to highlight and promote good practices at European level and propose actions in the field. In particular, certain issues should be highlighted such as the importance of promoting the protection of children, young people and human dignity in the media and support the creation of a media environment appropriate for citizens' social, educational and cultural needs. Also, working on the development of reliable means of evaluation is fundamental."

The Expert Group, which comprised European media literacy experts from a variety of backgrounds, held its first meeting in March 2006 and its tenth and final meeting in December 2010.[60] Having been involved in the preparation of the Commission's Communication and Recommendation on media literacy, the Expert Group was adjudged by the Commission to have fulfilled its objectives and completed its work, which led to the decision to discontinue its activitites. The Expert Group provided a valuable forum in which various aspects of media literacy could be discussed; its access to the Commission also facilitated the political development of the media literacy agenda. It is too early yet to speculate on how the absence of such an expert forum will impact on the further development of media literacy at the European level. There had been earlier calls for the Audiovisual Media Services Directive's Contact Committee to do more work on media literacy.[61]

(ii) As with the previous development, it is still too soon to predict what the likely consequences of the "re-location" of media literacy under DG Education and Culture will be. Whereas this could suggest the intention to embed media literacy more firmly in an educational approach, it does not necessarily imply that the topic will be sidelined from media regulatory policy. This also houses it alongside the EU's MEDIA Programmes,[62] which is interesting in light of earlier calls for a "specific strand on media literacy" to be included in future MEDIA Programmes.[63]

(iii) The Commission's Communication, "A Digital Agenda for Europe", states that the "digital era should be about empowerment and emancipation; background or skills should not be a barrier to accessing this potential".[64] As noted in Definitional Difficulties, above, digital literacy is not identical to media literacy, but the terms do interface in some important ways. The shared objective of avoiding or reducing social and other forms of exclusion is relevant in this connection. The inclusion of the item, "Enhancing digital literacy, skills and inclusion", in the Communication prepares the ground for further EU-level cross-institutional action in the field.[65]

2. Council of Europe

It was noted in the Introduction that there is considerable terminological variety in discussions of media literacy. This observation is borne out by Council of Europe standard-setting texts with focuses on media literacy. An astonishing array of different terms is used across those texts, including: visual literacy, audiovisual literacy, mass-media education, media education, media literacy, information literacy, media (and information) literacy, digital literacy, etc. Notwithstanding this high incidence of terminological variation, there is a broad overall congruence to the texts in question, as relevant provisions for the promotion of media literacy are based on a few distinct rationales (see further, below).

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60) For a brief overview of the Group's activities and achievements, see The EU Media Literacy Expert Group 2006-2010, available at: http://www.nordicom.gu.se/cl/publ/letter.php?id=138#The%20EU%20Media%20Literacy%20Expert%20 Group%202006%20-%202010

61) Council conclusions on a European approach to media literacy in the digital environment, *op. cit.*, para. 6.

62) For an overview of the MEDIA Programmes, see: http://ec.europa.eu/culture/media/index_en.htm

63) Opinion of the Committee of the Regions on "Media literacy" and "Creative content online", *op. cit.*, p. 1; European Parliament Resolution on media literacy in a digital world, *op. cit.*, para. 27.

64) A Digital Agenda for Europe, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, COM(2010) 245, 19 May 2010, p. 24; see further: IRIS 2010-7/4.

65) See further, *ibid.*, pp. 26-27.

European Ministerial Conferences on Mass/New Media Policy

European Ministerial Conferences on Mass Media Policy have been held periodically since the mid-1980s. Those conferences involved the participation of ministers (or their delegates) with relevant portfolios at national level. As such, the Ministerial Conferences can be distinguished from the day-to-day activities of the Council of Europe. Their relevance stems from their purpose to map out future European media policy, supplemented by action plans for its implementation.

The promotion of media education or literacy has been an intermittently recurrent agenda item at these European Ministerial Conferences. Resolutions adopted at the first two conferences called briefly for the development of media education (and "a critical awareness") as an integral part of the tasks of general education[66] and among viewers,[67] without further elaboration. Resolutions adopted at the third and fifth conferences focused on media education targeting the public at large and in respect of new communications technologies and information services, again without any real elaboration.[68] For its part, the sixth conference identified "media education and media literacy in new services" as instrumental for "developing a critical and discerning attitude towards media content, as well as ensuring greater awareness by individuals concerning the opportunities offered and challenges posed by these services and thus contributing to greater social cohesion".[69]

It was only at the seventh ministerial conference, "Integration and diversity: the new frontiers of European media and communications policy", held in Kyiv (Ukraine) in 2005,[70] that media literacy was explored in slightly more detail. In the context of the aim of enhancing protection of minors, media literacy is put forward as a way of helping children to "benefit from the positive aspects of the new communication services and avoid exposure to harmful content".[71] The Action Plan adopted at the conference advocates the promotion of media literacy in respect of all media and at all stages of education and ongoing learning.[72]

At the first Conference of Ministers responsible for Media and New Communication Services (in 2009, the ministerial conference was titled and calibrated differently in order to reflect changing notions of the media[73]), media literacy featured in the Resolution entitled, "Towards a new notion of media", and in its corresponding Action Plan.[74] The Resolution identifies media literacy as "essential" in the context of a people-centred, participatory, multi-stakeholder approach to the new media environment.[75] The Resolution calls for the recognition of media literacy "as part of the

66) First European Ministerial Conference on Mass Media Policy, The future of television in Europe, Vienna, 1986, Resolution No. 1, The promotion of European audio-visual works: production, scheduling, distribution and transmission across frontiers, Section I – Policies to promote audiovisual production in Europe, para. 7. The texts concerning mass communications policy adopted at the European Ministerial Conferences are available at http://www.coe.int/t/dghl/standardsetting/media/doc/DH-MM(2006)004_en.pdf

67) Second European Ministerial Conference on Mass Media Policy, European Mass Media Policy in an international context, Stockholm, 1988, Resolution No. 1 [untitled], Section I – Policy objectives, para. (f).

68) Third European Ministerial Conference on Mass Media Policy, Which way forward for Europe's media in the 1990s?, Nicosia, 1991, Resolution No. 2, New Channels and Means of Mass Communication in Europe, Section I, para. 7; Fifth European Ministerial Conference on Mass Media Policy, The Information Society: a challenge for Europe, Thessaloniki, 1997, Resolution No. 1, The impact of new communications technologies on human rights and democratic values, para. 11(iii).

69) Sixth European Ministerial Conference on Mass Media Policy, A media policy for tomorrow, Cracow, 2000, Programme of Action, Section III – Activities relating to social cohesion.

70) For an overview, see IRIS 2005-7/1.

71) **Resolution No. 3, Human rights and regulation of the media and new communication services in the Information Society**, paras. 16 & 17.

72) **Action Plan - Sub-theme 3 (Human rights and regulation of the media and new communication services in the Information Society)**, para. 4.

73) 28-29 May 2009, Reykjavik, Iceland. See: Adopted Texts, Doc. No. MCM(2009)011, available at: http://www.coe.int/t/dghl/standardsetting/media/MCM(2009)011_en_final_web.pdf . For an overview, see IRIS 2009-8/2. For analysis, see: Tarlach McGonagle & Kim de Beer, "*A brave new media world?* Een kritische blik op het nieuwe mediabeleid van de Raad van Europa", 22 *Mediaforum* 2010-5, pp. 146-156, available at: http://www.ivir.nl/publicaties/mcgonagle/Mediaforum_2010_5.pdf

74) Resolution, *Towards a new notion of media* & Action Plan, 28-29 May 2009, available in Adopted Texts, Doc. No. MCM(2009)011, *op. cit.*

75) Resolution, *Towards a new notion of media, op. cit.*, paras. 7 & 8.

education for democratic citizenship" and describes it as "a particularly important tool in optimising children's and young people's comprehension, critical thinking, citizenship, creativity and critical awareness of the media".[76] It sees media literacy as a way to make people "critical, competent and responsible" in their use of media and media-like services.[77] The Action Plan seeks to pursue work on media literacy in consultation with a range of stakeholders, including education specialists, "with the aim of making users, creators and distributors of content (in particular children and young people) responsible, informed and critical participants in the information society".[78] Non-formal education and the role of the media are mentioned as meriting attention in relevant strategies.

The above overview of relevant provisions in policy texts adopted at periodic ministerial conferences on mass/new media suggests that there has only been limited engagement with media literacy to date. Relevant provisions prioritise children as a target group. They favour formalising media education within broad educational settings, but also acknowledge the relevance of non-formal and lifelong/ongoing education. They underscore the importance of multi-stakeholder approaches. These summary priorities and observations are unpacked in various texts adopted by the Committee of Ministers and the Parliamentary Assembly.

Committee of Ministers

The objective of promoting media literacy is adverted to – with varying levels of emphasis – in several of the standard-setting texts adopted by the Committee of Ministers. The following table provides an overview of selected Committee of Ministers texts containing focuses on media literacy:

Year	Title	Focus	Para.
1985	Recommendation No. R (85) 8 on the conservation of the European film heritage	Relevance of film heritage for "mass-media education" and "studies in universities and research institutes"	Preamble
1997	Recommendation No. R (97) 19 on the portrayal of violence in the electronic media	Responsibilities of different sectors of society for promoting and providing media education; responsibility of parents and teachers for stimulating children and adolescents to develop a critical attitude, e.g. through media education within the family and in schools; shared responsibility for media education (states, those responsible for content, various sectors of society)	Guidelines Nos. 2, 4.
2003	Recommendation Rec(2003)9 on measures to promote the democratic and social contribution of digital broadcasting	Media literacy as a key factor in reducing risk of digital divide; special mention of the elderly and the less advantaged sectors of the population	8

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76) *Ibid*., para. 8.
77) *Ibid*., para. 12.
78) Action Plan for Resolution, *op. cit*., para. 11.

Year	Title	Focus	Para.
2006	Recommendation Rec(2006)12 on empowering children in the new information and communications environment	Structured educational approach from an early age; identification of specific harms, disaggregation of multi-stakeholder approach	Numerous preambular and substantive paras.
2007	Recommendation CM/Rec(2007)2 on media pluralism and diversity of media content	Promotion of digital media literacy to bridge the digital divide	2.2
2007	Recommendation CM/Rec(2007)3 on the remit of public service media in the information society	Public service media's central role in education, media literacy and lifelong learning	21
2007	Recommendation CM/Rec(2007)11 on promoting freedom of expression and information in the new information and communications environment	Particular importance of media education in empowering individual users in the new information and communications environment	Section I of Guidelines
2007	Recommendation CM/Rec(2007)16 on measures to promote the public service value of the Internet	Policies to protect/enhance the right to education, incl. media and information literacy; promotion of media and information literacy in formal and non-formal education sectors for children and adults (to empower them in their use of media technologies; encourage exercise of democratic rights and civic responsibilities; encourage informed choice-making online)	Appendix, I – Human Rights and Democracy; II – Access
2008	Recommendation CM/Rec(2008)6 on measures to promote the respect for freedom of expression and information with regard to Internet filters	Inform children and young people about the benefits and dangers of Internet content and its filtering as part of media education strategies in formal and non-formal education	Preamble, Guideline II (iv)
2009	Declaration on the role of community media in promoting social cohesion and intercultural dialogue	Multi-stakeholder approach, direct involvement of citizens and as part of lifelong learning	Preamble & para. (iv)(c)
2009	Recommendation CM/Rec(2009)5 on measures to protect children against harmful content and behaviour and to promote their active participation in the new information and communications environment	*Inter alia*, multi-stakeholder approach; development of Internet skills and literacy in tandem with promotion of safe and secure spaces on Internet and labelling of online content; awareness-raising; school curricula; countering sexism in online content, etc.	1, 6, 8, 9, 14, 15, 16

The rationales advanced for the promotion of media literacy in the above texts (sometimes separately and sometimes in parallel) can be grouped as follows:
- the civic empowerment of individuals;
- the reduction/elimination of the digital divide;
- the facilitation of informed decision-making, especially in respect of harmful and illegal online content.

On occasion, texts prise open the nature and objectives of media literacy, e.g. by deepening levels of understanding of how the media work and by sharpening critical attitudes towards the media. A sense of shared responsibility for media education[79] has steadily grown into an explicit insistence on the importance of a multi-stakeholder approach to the promotion of media literacy. This is clearly a reflection of the increasingly complex constellation of involved parties. The enumeration of relevant stakeholders facilitates the identification of specific roles for each, e.g. public service media's educational role[80] and the roles expected of private-sector and civil-society actors.[81]

Finally, it is useful to draw attention to an attempt by the Committee of Ministers to identify the different types of content that can prove harmful for children. Very often, reference is made in policy documents to harmful content as an expansive and undifferentiated term. In its Recommendation Rec(2006)12 on empowering children in the new information and communications environment, the Committee of Ministers identifies selected types of harm, which facilitates the follow-on task of devising appropriate, tailored strategies for countering them. It recommends that Council of Europe member states should:

> "ensure that such skills enable children to better understand and deal with content (for example violence and self-harm, pornography, discrimination and racism) and behaviours (such as grooming, bullying, harassment or stalking) carrying a risk of harm, thereby promoting a greater sense of confidence, well-being and respect for others in the new information and communications environment."[82]

Parliamentary Assembly

The following table provides an overview of selected Parliamentary Assembly of the Council of Europe (PACE) texts containing focuses on media education or literacy:

Year	Title	Focus	Para.
1987	Recommendation 1067 (1987) on the cultural dimension of broadcasting in Europe	(i) school courses; (ii) adults and not only parents	20(h)
1989	Recommendation 1098 (1989) on East-West audiovisual co-operation	Audiovisual literacy, research, teacher training and exchanges	15
1993	Recommendation 1215 (1993) on the ethics of journalism	Foster the setting up of citizens' media associations; encourage schools to provide media education	5(iii)

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79) Recommendation No. R (97) 19 on the portrayal of violence in the electronic media, *Available at :* http://www.coe.int/t/dghl/standardsetting/media/doc/CM/Rec%281997%29019&ExpMem_en.asp
80) Recommendation CM/Rec(2007)3 on the remit of public service media in the information society, *op. cit.*, para. 21.
81) Recommendation Rec(2006)12 on empowering children in the new information and communications environment, available at: https://wcd.coe.int/wcd/ViewDoc.jsp?Ref=Rec%282006%2912&Language=lanEnglish&Ver=original&Site=COE&BackColorInternet=DBDCF2&BackColorIntranet=FDC864&BackColorLogged=FDC864
82) *Ibid.*, para. (iii).

Year	Title	Focus	Para.
1995	Recommendation 1276 (1995) on the power of the visual image	Visual images – part of literacy, promotion	7, 11(ii)
1998	Resolution 1165 (1998), Right to privacy	Governments – media education wider scale – education on human rights and responsibilities, privacy	16(iii)
1999	Recommendation 1407 (1999), Media and democratic culture	curricula	9(viii)
2000	Recommendation 1466 (2000), Media education	See below, for detailed analysis	Numerous provisions
2002	Recommendation 1586 (2002), The digital divide and education	Quality appreciation of digital information	g
2005	Recommendation 1706 (2005), Media and terrorism	Curricula - terrorism	10(iv)
2007	Recommendation 1789 (2007), Professional education and training of journalists	Globalisation of media, differences in cultural and media practices	7
2008	Recommendation 1836 (2008), Realising the full potential of e-learning for education and training	Digital literacy for all as strategy against digital divide	10
2009	Recommendation 1855 (2009), The regulation of audio-visual media services	Develop policy guidelines for new means of content control, incl. media literacy of users	12.4
2009	Recommendation 1882 (2009), The promotion of Internet and online media services appropriate for minors	Media literacy & harmful content, children, adolescents, parents, teachers, Internet and online media services, opportunities and risks	1, 18

A tentative pattern emerges from the above overview: the PACE tends to focus more on the need to embed media education in formal and non-formal educational structures than on theoretical justifications for the promotion of media education or literacy. It is only in its most recent relevant texts that the PACE has begun to meaningfully engage with the specificities of media literacy's relevance in an online environment. Different target groups and stakeholders are identified, but in a more limited fashion than in comparable texts adopted by the Committee of Ministers. Recommendation 1882 (2009) is the text which sets out the potential roles for a diversity of stakeholders in the most detailed way.

The PACE's most sustained engagement with media education/literacy in a single text can be found in its Recommendation 1466 (2000), entitled "Media education".[83] This is where the PACE sets out the essence of its vision and ambitions in respect of media education/literacy.

The Recommendation defines the media education of citizens as "teaching practices which aim to develop media competence, understood as a critical and discerning attitude towards the media in order to form well-balanced citizens, capable of making their own judgements on the basis of the available information".[84]

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83) Adopted on 27 June 2000.
84) These paragraphs include reworked excerpts from Emre Yildrim, "Parliamentary Assembly: Recommendation on Media Education", IRIS 2000-7/100.

The PACE documents some examples of media effects, on the basis of which, it identifies an urgent need to develop media education in order to promote "active, critical and discerning use of the media". Media education teaches individuals to interpret and produce messages, to select the most appropriate media for communicating and, eventually, to have a greater say in the media offer and output. It enables them to exercise their right to freedom of expression and right to information and is beneficial for their personal development. Furthermore, it stimulates active democratic citizenship and political awareness.

The PACE recommends that the Committee of Ministers: (i) call on Council of Europe member states to encourage the elaboration and the development of media literacy programmes for children, adolescents and adults, and (ii) teacher-training programmes in the field of media education. It also calls for a (quantitatively and qualitatively) satisfactory offer of educational programmes (including media education) to be provided by the different media.

3. Comparison of EU and Council of Europe approaches

There is much commonality between the approaches to the promotion of media literacy adopted by the EU and the Council of Europe, in terms of their objectives, thematic and programmatic emphases and key target groups and stakeholders. The EU's approach has more formal circularity than that of the Council of Europe. This can be explained partly by shared textual reference points and the formal exchanges between relevant actors within the EU institutions which they engender. The existence of focal texts facilitates the incorporation of different intra-institutional perspectives in policy-making. It also makes for coordinated action across different platforms at EU-level. The ability to embed media literacy simultaneously in different programmes facilitates a diversified approach, financial underwriting and multi-annual planning, three essential requirements for the progressive development of media literacy.

On the other hand, the less systematic and less formalised cross-referencing that is evident in Council of Europe texts also has advantages, e.g. the ability to explore specific emergent themes in a very detailed and contextualised way. Such an approach could usefully lend itself to, for example, developing a multi-dimensional approach to media literacy for the elderly or the disabled (see further, below). It is also important to note that the Council of Europe has steadily developed a very practical approach to the promotion of media literacy through its Internet Literacy Handbook.[85]

IV. Outlook and challenges of consolidation and further development

The previous section reveals that the main European-level regulatory focuses on media literacy are based on the rationales of participation, protection and social inclusion and that they primarily target children/minors and the public at large. It is useful at this juncture to try to explain why other key target groups identified above are not more centrally positioned in regulatory provisions (and their implementation). The elderly and the disabled will be taken as sample key target groups for present purposes, which will again implicate the rationales of participation, protection and social inclusion.

1. The elderly

The participatory capacities of the elderly are often largely shaped by the nature and levels of assistance and stimulation they receive to engage with new predominantly digital media or e-democracy. The relevance of participation of the elderly members of society has been underscored at EU level.[86]

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85) Available at: http://www.coe.int/t/dghl/StandardSetting/InternetLiteracy/hbknew_en.asp
86) European Parliament Resolution on media literacy in a digital world, *op. cit.*, paras. 11; 28-30 (Section entitled "Media education for older people"); Study on Assessment Criteria for Media Literacy Levels, Final Report, *op. cit.*, at pp. 14 and 87.

There are good examples of structural and programmatic initiatives promoting media literacy for the elderly at the national level. For instance, Ofcom UK has had a special Advisory Committee on Older and Disabled People (ACOD) since 2004. It advises Ofcom about the interests and opinions of older and disabled persons living in the UK.[87] In its Annual Report for 2009/10, ACOD called on Ofcom to "ensure that older and disabled people are equal players and full participants across current and emerging convergent telecommunications and broadcasting technologies, new media platforms and digital and traditional broadcast media".[88] Ofcom's audit of media literacy across the UK contained a special focus on older people[89] and over the past few years, ACOD has published numerous research reports on different aspects of media literacy for older people, e.g. digital switchover issues and how manufacturers, suppliers and retailers can address the needs of the elderly and disabled.[90] The most recent research study, Next Generation Services for Older and Disabled People,[91] set out to identify and report:

> (i) details of new and near-future Next Generation Services (NGS)[92] that have the potential to benefit older and disabled people's lives;
> (ii) the potential benefits from such services, and
> (iii) the risks and challenges to the realisation of the potential benefits to older and disabled people.[93]

In the Netherlands, the aforementioned *Mediawijzer.net* dedicates a dossier to assisting the elderly in the digital environment.[94] The goal of the dossier is to assist the elderly to find their way along the digital freeway. One of the partners of *Mediawijzer.net* is *SeniorWeb*. In a joint collaborative initiative with public libraries, *SeniorWeb* has created 370 education centres in which it offers courses on media literacy for elderly members of society.[95]

Another initiative at member-state level comes from Eirí Corca Baiscinn, a community organisation in Ireland. The organisation's activities include providing training courses for adults who want to develop skills to improve their employment prospects, basic literacy and personal development. In addition to these courses, Radio Corca Baiscinn (a community radio station) organises skills training for elderly as well as disabled members of society.[96]

2. The disabled

The importance of the disabled as a specific target group for media literacy goals has been recognised explicitly *inter alia* by various EU bodies.[97] Nevertheless, the recent studies commissioned by the European Commission pay little or no attention to the group or its specific needs and interests. In the 2009 Study on Assessment Criteria for Media Literacy Levels, the disabled are not even mentioned in its recommendations.

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87) See further:
http://www.ofcom.org.uk/about/how-ofcom-is-run/committees/older-and-disabled-people/functions-and-role/

88) ACOD Annual Report 2009/10,
http://www.ofcom.org.uk/about/how-ofcom-is-run/committees/older-and-disabled-people/annual-reports/2009-10/

89) Ofcom Media Literacy Audit: Report on media literacy among older people, April 2006:
http://www.ofcom.org.uk/advice/media_literacy/medlitpub/medlitpubrss/older/

90) For details, see: http://www.ofcom.org.uk/about/how-ofcom-is-run/committees/older-and-disabled-people/research/

91) i2 mediaresearch for ACOD, *Next Generation Services for Older and Disabled People,* 13 September 2010, available at:
http://www.ofcom.org.uk/files/2010/09/ACOD-NGS.pdf

92) Next generation services (NGS) are new and improved telecommunications services that make use of the speed and capacity of next generation networks and are delivered to end users via next generation access.

93) *Ibid.*, p. 1 (paraphrasal).

94) Mediawijzer.net, dossier "Senioren op het web", http://www.mediawijzer.net/?q=dossiers/publiek/senioren-op-het-web

95) SeniorWeb: www.seniorweb.nl/handigmetinternet

96) Study on the Current Trends and Approaches to Media Literacy in Europe (2007), Country Profile Ireland V4.0, p. 8. Full details of this Study, including Country Profiles, are available at:
http://ec.europa.eu/culture/media/literacy/studies/index_en.htm

97) A European approach to media literacy in the digital environment, European Commission Communication, *op. cit.*, p. 5; A Digital Agenda for Europe, European Commission Communication, *op. cit.*, pp. 24-27; European Parliament Resolution on media literacy in a digital world, *op. cit.*, paras. 11 and 24; Committee of the Regions, Opinion on "Media Literacy" and "Creative Content Online", *op. cit.*

However, this does not mean that European states do not pay attention to this group. For instance, as already mentioned, the ACOD is a special Advisory Committee to Ofcom that addresses the importance of older and disabled people in society.

In the Netherlands, *Mediawijzer.net* also has a separate dossier devoted to media literacy for disabled people.[98] The dossier contains background information, tips and a list of partner websites for disabled people. One of the partners is Eddy: Electronic Distance-learning for Disabled Youngsters.[99] This is a digital educational platform that assists high school students with disabilities who are not able to attend classes due to their disabilities.

Aside from the obvious arguments of principle for directing media literacy at persons with disabilities, there are also clear legal arguments to do so. The EU's recent ratification[100] of the United Nations Convention on the Rights of Persons with Disabilities[101] means that the Convention's very detailed, technology-attuned and forward-looking provisions on access to information and content will have to be implemented at national level. For instance, Article 9 ("Accessibility") of the Convention includes the obligations for States Parties to:

> "(f) Promote other appropriate forms of assistance and support to persons with disabilities to ensure their access to information;
> (g) Promote access for persons with disabilities to new information and communications technologies and systems, including the Internet;
> (h) Promote the design, development, production and distribution of accessible information and communications technologies and systems at an early stage, so that these technologies and systems become accessible at minimum cost."

These obligations are supplemented by those set out in Article 21 ("Freedom of expression and opinion, and access to information"), including:

> "(c) Urging private entities that provide services to the general public, including through the Internet, to provide information and services in accessible and usable formats for persons with disabilities;
> (d) Encouraging the mass media, including providers of information through the Internet, to make their services accessible to persons with disabilities".

Here, the "access" component to the definition of media literacy is of paramount importance.

V. Conclusion

The best answer to the question posed in the title of this article is probably a qualified "yes", but challenges remain for the consolidation of media literacy's new-found status within the European audiovisual regulatory framework. Challenges also exist at the national level.[102]

The refinement that is likely to result from new reporting obligations and processes under the AVMSD should facilitate the distillation of best practices and the development of bench-marking activities. However, it has been noted that media literacy education in Europe is a "highly contextualized activity that takes many forms in many different cultural and learning

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98) Mediawijzer.net dossier "*Mediawijs met een beperking*",
http://www.mediawijzer.net/?q=dossiers/professionals/mediawijs-met-een-beperking.
99) EDDY: Electronic Distance-learning for Disabled Youngsters, www.eddycollege.nl
100) 23 December 2010.
101) Adopted by United Nations General Assembly Resolution A/RES/61/106 on 13 December 2006; entry into force: 3 May 2008.
102) For a comprehensive overview of regulatory issues at the national level, see: Emmanuelle Machet, "Media Literacy – what role for the regulators?", Background paper EPRA 2008/02, 27th EPRA Meeting, Riga, 14-16 May 2008, available at: http://www.epra.org/content/english/press/papers/literacy_final.pdf

environments".[103] The search for increased consistency across national and cultural situations for reporting and evaluation purposes must leave sufficient space for the recognition and appreciation of variation in strategies and progress at the national and sub-national levels.

In light of these challenges, there remains a need to continue to reflect on the position and role of media literacy in European (and national) regulatory frameworks. It must not be (perceived as) merely a sweetener for deregulation. Genuine commitment to the development of a multi-stakeholder approach to media literacy is essential in this respect.[104]

So far, the promotion of media literacy by the EU and the Council of Europe has resulted in detailed engagement with the specificities of children as a target group and also, to a lesser extent, those of adults/the public at large. Such detailed engagement could usefully be replicated in respect of other target groups, e.g. the elderly, the disabled, linguistic minorities, the socially/ economically disadvantaged. The same rationales for the promotion of media literacy for children apply *mutatis mutandis* to these groups. Detailed engagement with the specificities of these target groups must begin with an understanding of their particular needs and requirements – an ongoing process facilitated by relevant multi-stakeholder involvement.

It has been claimed that "The promise of media literacy, surely, is that it can form part of a strategy to reposition the media user – from passive to active, from recipient to participant, from consumer to citizen".[105] How long it will take to deliver fully on that promise remains to be seen.

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103) Renee Hobbs & Amy Jensen, "The Past, Present, and Future of Media Literacy Education", *op. cit.*, at p. 2.
104) See further, **Brian O'Neill, "Current policy developments in European media literacy"**, *op. cit.*, at p. 240.
105) Sonia Livingstone, "What is media literacy?", (2004) *Intermedia* 32(3), pp. 18-20, at p. 20.