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# Arming the citizen-consumer: The invention of 'media literacy' within UK communications policy

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## Abstract

This article explores the emergence of the concept of 'media literacy' within UK communications policy, focusing particularly on the period leading up to the 2003 Communications Act. While broadly deregulatory in intention, the Act gave the new media regulator, Ofcom, a duty to 'promote media literacy'. This article explores the origins of this theme, the different discourses and definitions in play, and the roles of the various agents involved. It argues that there were some significant strategic shifts in the debates around media literacy, which reflect broader tensions between neoliberal and social-democratic tendencies within New Labour's communications policy. The article suggests that this resulted in a lack of clarity about the definition of media literacy, the scope and nature of Ofcom's role, and the means by which the policy might be implemented – problems that partly account for the subsequent demise (or significant redefinition) of media literacy as a theme within communications policy towards the end of the decade.

## Keywords

Communications policy, education, media literacy, Ofcom, regulation

The appearance of the term 'media literacy' in the UK's 2003 Communications Act was surprising, even puzzling, for many in the media education field – and indeed for many beyond it. The term itself had not been in common parlance in the UK prior to this time, although it was more prevalent in North America. Of course, the idea that people should be educated about the media has been around for decades (see Buckingham, 2003), but

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it has rarely received much sympathetic attention within either educational or communications policy. Yet under New Labour, the concept of media literacy was not simply adopted by policy-makers but also enshrined in law. While the main purpose of the Communications Act was to deregulate the communications industry and to combine five regulators into a single entity, it also required the new regulator, Ofcom, to 'promote media literacy'. This article explores how this situation came about, the different discourses and definitions in play, and the roles of the various agents involved.

In so doing, we hope to shed light on the roots of some of the tensions and uncertainties that continue to be evident with respect to media literacy almost a decade later, and to extrapolate some more general insights into the processes, complications and often unintended consequences of communications policy-making. As we shall argue, policy-makers' usage of the concept of media literacy was characterised by a strategic lack of clarity almost from the outset; and while this enabled the concept to perform a variety of functions for a variety of potential stakeholders, it also allowed it to be redefined in ways that significantly reduce its scope and blunt its critical edge. In the closing years of New Labour, and now with the Coalition government, media literacy has fallen from grace as a preferred term within communications policy; and where it is used at all, the ways in which it is defined have become steadily narrower and more instrumental. Yet as we hope to show, the seeds of its demise were already prefigured in its invention and its early development as a policy theme.

This analysis has a wider relevance to readers of the journal, as media literacy has become a key dimension of communications policy across a range of European countries – although only in rare instances (such as Hungary) has it become a mandatory aspect of *education* policy. At the pan-European level, media literacy featured briefly in the European Audiovisual Services Directive (2007); and over the past couple of years, the Commission has been moving steadily towards the formulation of a binding policy. There was an official 'communication' on media literacy in late 2007, followed in 2008 by a study of current trends in the field; while a 'recommendation' in summer 2009 has led to the funding of further small-scale scoping studies and networking activities. The move from a communication to a recommendation is a sign that progress is being made – and that pressure will eventually be exerted on national governments as well. Nevertheless, fundamental questions remain here too about the definition and the remit of media literacy, which can be traced both to broader political pressures and to strategic or pragmatic choices (for further discussion, see Buckingham, 2010).

The key focus of our analysis here, therefore, is on the basic rationale for media literacy as a dimension of communications policy. Why did media literacy appear on the policy agenda at this time? What functions did it perform for different potential stakeholders or interest groups? Why did it take the form that it did? And how can the study of its initial 'invention' as a policy theme help us to interpret some of the difficulties and obstacles that its advocates have subsequently encountered?

## Violence and the Viewer

In December 1995, the murder by a teenager of the London headteacher Philip Lawrence reopened familiar debates about the effects of media portrayals of violence. The

government needed to be seen to respond, and so Virginia Bottomley, the Secretary of State for National Heritage, requested that the BBC, the Independent Television Commission (ITC) and the Broadcasting Standards Commission (BSC) should work together 'to help educate viewers about the principles underpinning the BBC-ITC-BSC codes and guidelines and, in particular, policies on scheduling and the watershed, and to explore how broadcasters could improve advance programme information for viewers' (BBC, 1998: 3). The Joint Working Party that resulted met between April 1997 and April of the following year; and *Violence and the Viewer: Report of the Joint Working Party on Violence on Television* was finally published in July 1998.

If policy officials had been hoping for some quick-fix proposals and undertakings from the broadcasting industry, they may not have been altogether pleased with what came back to them. Whilst the report addresses the various specific areas it had been asked to explore, a significant section (Chapter 5) is devoted to the need for *media education* – 'an idea whose time has come' – for which it recommends a national strategy involving the industry, government, teachers and parents. The recommendation is a surprising one in that it appears to be well beyond the brief given, and places a sizable slice of the responsibility back at the door of government: 'there is a clear role for government to provide the lead in co-ordinating the proposed strategy with the many different parties involved, as well as ensuring that appropriate curricular initiatives are taken' (BBC, 1998: 8). More particularly, the recommendation is notable for the following features: first, it specifically adopts the phrase 'media literacy' (used three times in Chapter 5); second, the recommended strategy is implicitly cross-departmental, broad and long-term, in seeking to ensure 'the development of appropriate critical viewing skills from the earliest possible age'; and third, the strategy being recommended explicitly places an emphasis on the role of schools: 'teachers at both primary and secondary levels should be involved in the design of the strategy at an early stage' (BBC, 1998: 8).

It is interesting to speculate whether the policy developments that followed might have been very different had the term *media literacy* *not* been employed within this report. The reason it was is to some extent fairly arbitrary. Although not a member of the Working Party itself, a major contributor to, and principal drafter of the report (and of Chapter 5 in particular), was the then ITC Head of Educational Broadcasting, Dr Robin Moss. Moss had begun his career as a schoolteacher and worked with colleagues in British universities on early developments in media education, which he said 'at that time [was] generally regarded as very much an American subject' (interview Robin Moss, 5 May 2011). However, this attribution of leadership to the US was by no means universally shared, as there was a strong current of thinking that media education in the USA had a great deal to learn from other countries. Indeed, US scholar and leading advocate of media education, Robert Kubey, wrote at the time: 'The United States finds itself in the ironic position of being the world's leading exporter of media products while lagging behind every other major English speaking country in the world in the formal delivery of media education in its schools' (Kubey, 1998: 58). By way of explanation for this state of affairs, Kubey cites 'among many factors': 'the sheer physical size of the US, its highly heterogeneous population, resistance to the federal government's making central educational or broadcasting policy, the fact that the US exports

far more media products than it imports, and a long-standing reluctance to take the popular arts seriously' (Kubey, 1998: 58).

Nevertheless, Chapter 5 of the *Violence* report describes the US media education experience in surprising detail and in glowing terms, noting the priority that the Clinton administration was apparently giving to it. The related appendix contains 11 internet articles harvested largely from North American sources. The report refers to 'the energy and maturity of the media education movement in the US' and cites as an example the work of the newly formed Partnership for Media Education ('leaders of the media literacy movement'). The report is effusive: 'The efforts ... to develop media education on a national scale evident in other countries, and especially the US, have a clear relevance to those concerned with the future direction of broadcasting in the UK' (BBC, 1998: 38). One might be forgiven for concluding from this that, by contrast, media education in the UK was comparatively underdeveloped.

This preoccupation with the situation in the US provides one possible explanation for the relatively sudden adoption of the term 'media literacy' within the policy discourse of this time. However, it is also likely that a term that avoided the words 'education' or 'studies' seemed both attractive and useful. Media *studies* in particular – by this point, a well-established optional subject examined at GCSE and A-level – was popularly reviled, especially in the right-wing press, as simultaneously trivial ('a Mickey Mouse subject') and yet also dangerously political (Barker, 2001). Media *literacy* appeared to be more neutral, acquiring much of its force from its association with the higher status of print literacy. It also lacked more specific associations with particular curriculum areas, thus perhaps enabling it to command broader assent as a generally worthy educational goal. As Moss recalls: 'I think the reason that media literacy was on our lips ... was that it was a positive term, if you thought about it. It was about enabling people to get the most and best out of the experience of listening or viewing. It wasn't so much about studying their responses and analysing them' (interview Robin Moss, 5 May 2011).

## **New Labour and the responsible media consumer**

By the time *Violence and the Viewer* was finally published, the political landscape had been completely altered by a general election: the era of New Labour had begun. The Department for National Heritage had become the Department for Culture, Media and Sport (DCMS), and a new Secretary of State had assumed office in the person of the MP for Islington South and Finsbury, Chris Smith. Smith now describes the advice of the *Violence* report as 'not unwelcome': 'we were very much, at the time, in the business of seeing the need to arm the consumer of media with the best possible tools to make choices, to dissect what they were seeing and listening to, and greater education, greater awareness, greater assurance were all very much to be welcomed' (interview Chris Smith, 23 September 2011).

Smith's rhetoric of 'arming the consumer' and of 'choice' and 'awareness' is of course highly symptomatic. Much has been written about the extension of regulation into the private sphere, an approach that is seen by many theorists as a manifestation of contemporary forms of neoliberal 'governmentality' (e.g. Rose, 1999). For example, in his analysis of New Labour language and rhetoric, Norman Fairclough has observed:

The moral and contractual discourse of New Labour is an individualist discourse, which stands in contrast with the traditional collectivism of the centre-left and the left. The 'deals' that are contracted are primarily envisaged as deals which individuals enter into, the 'responsibilities' and 'duties' are primarily those of individuals. New Labour has abandoned even a residual orientation to collectivism and to social class. (Fairclough, 2000: 40)

From this perspective, areas previously seen as the responsibility of government to regulate are now matters for the individual. What Rose and Miller refer to as the 'inter-section of socio-political aspirations and private desires for self-advancement' means that individuals can be governed through their freedom to choose (Rose and Miller, 1992: 201):

Government was to be vested in the entrepreneurial activities of producers of goods and suppliers of services, the expertise of managers equipped with new modes of calculation, the operation of a market that would align the activities of producers and providers with the choices of consumers, actively seeking to maximise their 'lifestyles' and their 'quality of life'. (Rose and Miller, 1992: 197–198)

In this broader move towards 'responsibilisation' (Rose, 2000), individuals (and their families) are seen to go about their own business in the marketplace, protecting themselves (and their children) from harmful influences or offence, mitigating risk to themselves, and exploiting the new opportunities afforded by new technologies.

On one level, media literacy provides a clear instance of this process of responsibilisation (Buckingham, 2009). The logic would seem to run as follows. In an increasingly deregulated, market-driven media environment, media consumers are enjoying much greater choice. Yet with new media technologies, centralised state regulation is becoming increasingly difficult to sustain. If the potentially harmful consequences of this are to be avoided, consumers need to be encouraged to choose in responsible ways. Media literacy, in this sense, is about learning to make *informed choices*: making effective use of available technologies and systems to block or filter content, as well as viewing 'critically' and being generally 'aware' of how the media work. Although the broad impulse is one of protectionism, therefore, the focus has shifted away from centralised governmental regulation towards individual self-regulation.

However, the emphasis on media literacy also reflects what David Hesmondhalgh has called the 'hybridity' of New Labour's cultural policy (Hesmondhalgh, 2005) – its sometimes uneasy compromise between broadly social-democratic and neoliberal values. Alongside the emphasis on the consumer, there is also a recurring theme of citizenship – and these terms are often used interchangeably, or indeed combined, as in Ofcom's characteristic formulation of the 'citizen-consumer' (Lunt and Livingstone, 2012). Media literacy is seen here as a means of promoting citizens' participation and even 'empowerment', not merely in terms of gaining access to technology, but also in using it for civic and democratic purposes. The focus on education and 'critical understanding' could also be seen to represent a more active role for the citizen, offering the grounds for a more agonistic social debate, in which citizens are able to call the media to account. Nevertheless, as we shall see, these competing emphases were not always sustained or coherently articulated as media literacy made its way into legislation.

## From discourse to policy

Although the *Violence* report can be seen as formative, particularly in the emergence of the term media literacy, it would be naïve to suggest that its role was directly causal. Whilst the DCMS's Annual Report 2000 makes no mention of media literacy, by the following year it had become part of one of the Department's six PSA (Public Service Agreement) Objectives. PSA Objective 3, Education, was: 'To develop the educational potential of all the nation's cultural and sporting resources; raise standards of cultural education and training; ensure an adequate skills supply for the creative industries and tourism; and encourage the take up of educational opportunities.' Reporting on progress within this objective, the document states: 'Over the past year, DCMS has been working closely with its sponsored bodies as well as DfEE [the then Department for Education and Employment] and other Government departments and agencies to develop further its educational interests and to support the Government's drive to raise standards and increase opportunities in education and lifelong learning more widely.' There follows a particular reference to media literacy:

In an age of digital broadcasting and technological convergence, and the challenge to traditional regulation these will bring, *there is a need for a more coherent approach to media literacy and critical viewing skills*. Following a successful Media Education Seminar held in 1999, the Department has prepared a Media Literacy Statement. This statement sets out the Department's understanding of media literacy and critical viewing and acts as a point of reference for future work. (DCMS, 2001a: 70–71, emphasis added)

The report goes on to reference its Film Education Working Group's report, *Making Movies Matter* (Film Education Working Group, 1999), and the Group's proposals to bring 'cineliteracy' into the classroom. It also describes the planned launch of a Global Film School (an 'internet-based learning network for the screen media') which would provide a 'Media Literacy Zone, aimed at primary and secondary level school children' (DCMS, 2001a: 72).

The Media Education Seminar referred to here was the new administration's direct and seemingly enthusiastic response to the recommendations of *Violence and the Viewer*. It was designed to 'examine current initiatives on media education and assess the scope for a coherent approach to critical viewing in an age of digital broadcasting and technological convergence'. This apparently 'successful' seminar was followed by the publication of two significant documents, formally placing media literacy on the policy agenda. The first was the December 2000 Government White Paper. Hot on its heels, the second was the DCMS's Media Literacy Statement 2001, referred to in its Annual Report in March of that year.

## The White Paper and the Media Literacy Statement 2001

The White Paper *A New Future for Communications* was the work of two Departments of State, the Department of Culture, Media and Sport and the Department for Trade and Industry (DTI and DCMS, 2000). It set out for the first time the government's vision for the



new deregulated communications world, with a joint introduction from Chris Smith and the Trade and Industry Secretary, Stephen Byers. Chapter 6 of the report, entitled 'Safeguarding the interests of citizens', plainly demonstrates the neoliberal shift towards responsabilisation discussed above: 'The freedoms which are at the heart of our arrangements for communications bring with them responsibilities and we want to ensure that the growth of multi-channel, multi-media services serves society and the interests of citizens and does not harm them' (DTI and DCMS, 2000: 57). As one of a string of provisions, it proposes that 'OFCOM will promote systems to help people make informed choices about what they and their children see and hear; and have a duty to promote media literacy, working with DfEE, the industries and educators' (DTI and DCMS, 2000: 59). This duty to promote media literacy is then expounded in four following paragraphs. The first of these states:

This will help people to understand the distinctions between different media services, to appraise their content critically, to use the tools which are increasingly becoming available to navigate the electronic world, and to become empowered digital citizens. It will also help children to learn how to maintain critical distinctions such as those between fact and fiction (especially in interactive environments) or between reportage and advocacy, as well as how to assess commercial messages. (DTI and DCMS, 2000: 64)

It goes on to propose the setting up of a news archive for schools, before returning to the theme of 'family' responsibility, particularly in relation to internet use, improved content information, filtering and the principle of the watershed.

Here again, we find a familiar rhetoric of 'freedom' combined with 'responsibility'; of 'empowered citizens' and 'consumers'; and of 'informed choice'. Yet in recontextualising media literacy into a publication whose primary purpose is to introduce a deregulating Communications Bill, the language of the White Paper shifts significantly away from that of the *Violence* report. Both are broadly protectionist, in that they seek to defend the consumer from potential harm; but the emphasis in the White Paper is on the new digital communications landscape, and the idea of a 'digital citizen' is a new one.

In contrast to the White Paper produced by both the DCMS and DTI, the Media Literacy Statement 2001 was produced by the DCMS's Broadcasting Policy Division. The tone of this document is dryer, more academic in tone, and seemingly less focused on deregulation. The protectionist agenda is certainly still in evidence, but there is a more serious engagement with what media literacy might actually entail. Although there is some cross-referencing to the White Paper, this is fairly limited, and one-third of the Statement's content is concerned with the importance of 'critical viewing skills', a term that again seems to be drawn from the US rather than the UK context. Nevertheless, many of these skills are clearly adapted, albeit in a somewhat haphazard way, from UK media education curricular material of the time (such as the *Making Movies Matter* report, or indeed GCSE and A-level specifications). These include such skills as: distinguishing fact from fiction; identifying different levels of realism; making judgements of 'quality and context based on an understanding of mechanisms of production and distribution'; differentiating reportage from advocacy; recognising and assessing commercial messages; awareness of the 'economic and presentational imperatives that underlie news management'; and the ability to explain and justify media preferences (DCMS, 2001b: para. 3.1).



While there is no clear definition attempted in either of them, these two documents taken together suggest that the concept of media literacy was proving to be broad enough to adapt with changing circumstances, and that this provided it with a certain value in policy terms: it possessed the flexibility to address, or appear to address, a range of differing concerns and priorities that were not necessarily always made explicit. As long as the concept remained an elastic one, those with an exclusively protectionist agenda could read this as being the policy's primary purpose; whereas for those who wanted to find within it the spirit of the 'national strategy' for education proposed in the *Violence* report, or even a new approach to civic engagement, this too might be found. Shortly after their publication, however, the political wind changed suddenly again. On 8 June 2001, Labour won its second term in office, and in the ensuing Cabinet reshuffle, both Chris Smith and Stephen Byers were moved elsewhere.

## The Draft Communications Bill

In the DCMS's 2002 Annual Report, signed by the new Secretary of State, Tessa Jowell, media literacy is again referenced under PSA Objective 3, with a brief recognition of the 'growing need for media literacy' in light of technological convergence and the 'consequent difficulty of applying traditional forms of content regulation' (DCMS, 2002: 54). No further mention is made of media literacy here, but two months later, the Draft Communications Bill was published for consultation, accompanied by both a set of explanatory notes and a policy narrative. A document of 259 clauses and 13 schedules (both of which later expanded), the Bill was published on 7 May 2002. The discourse adopts the formality of legislation, and is therefore quite different from previous policy documents. Clause 10 of the Bill parses media literacy in a series of subclauses referring to 'the development of a better public understanding of the nature and characteristics of material published by means of the electronic media', as well as the processes by which it is selected and produced, and the 'technologies and systems' through which it can be regulated and controlled by users (DTI and DCMS, 2002a: Clause 10). Meanwhile, the accompanying explanatory notes indicate some specific ways in which these provisions might be implemented, for example through filtering, rating systems and parental control devices. They also refer to the possibility of Ofcom promoting the use of such techniques through its 'participation in the development of related educational materials' (DTI, 2002).

The composition of these two documents is heavily determined by the conventions of their genre, the drafting of legislation being the responsibility of the Office of Parliamentary Counsel. The draft Bill is set out in clauses and listed subclauses, periodically numbered for reference, and with recurring syntactical patterns. The explanatory notes are set out as a single paragraph, borrowing much of the official language of the draft Bill, and where examples are given these are stated formally and factually without elaboration. Yet the difference between earlier policy statements and this one, drafted by lawyers, reflects more than a legal technologising of language. In the process, there is a notable, if subtle, shift in emphasis.

Most obviously, whilst the general public was always in Ofcom's broad frame of reference, prior to this point there was also an emphasis placed on the educational needs of

children and the role of schools. In the draft Bill itself, this has now disappeared. Here, the aim of media literacy is ‘better public awareness and understanding’ with no specific educational reference. The educative purpose has become ‘awareness’ and ‘understanding’, with the number of repetitions of these abstract nouns suggesting a relatively greater emphasis on the word ‘awareness’ (implying a general consciousness) than on ‘understanding’ (perhaps implying a more rigorous form of engagement, comprehension and knowledge). This need for ‘public awareness’ condenses the active verbs plentifully in evidence in the White Paper (‘to understand the distinctions’, ‘to appraise their content critically’, ‘to help children to learn’ and so on) to the single idea of cognisance. And when it comes to elaborating precisely what the public needs to be aware of, the text assumes a kind of neutral ‘data-speak’, referring to *processes* (‘by which such material is selected’), *technologies* and *systems* (‘for regulating access’). These words connote the mechanical acquisition of information, inanimate functionality, neutrality and the inevitable logic of technology – there is nothing to indicate a requirement for skills of interpretation, or the making of social or cultural judgements that may need to be critically examined.

All this, however, is qualified by the policy narrative, published alongside the draft Bill and the explanatory notes. In addition to requiring Ofcom to promote public understanding of (self-)regulatory techniques such as filtering and rating systems, it also proposes a more specifically *educational* function, as part of the wider remit of ‘enabling people to make informed choices about what they and their children see and hear and, importantly, to think critically about viewing’:

To promote media literacy OFCOM may carry out a range of activities such as providing (or encouraging others to provide) information about the nature of material which people are accessing and information on the types of tools which people use to manage access to such material. OFCOM may also conduct research into media literacy. Together with the Department for Education and Skills, schools and other interested parties OFCOM may participate in developing media literacy through course materials for use in formal education. (DTI and DCMS, 2002b: para. 8.6.5.3)

The tone and accessible style of this document are altogether different, coming as it does from the DCMS policy team, rather than Counsel. The text borrows far more obviously from the White Paper, as is evident from an examination of the vocabulary discussed above. The word ‘understanding’ is used in preference to ‘awareness’, and there is clearly an educative purpose suggested beyond the mere awareness of ‘technologies and systems’ (in the preferred vocabulary of the draft Bill). The document explicitly stresses the importance of thinking critically. Most notable is the reference to children, and the emphasis on working with those involved in formal education.

With a distance of a decade, it is impossible to be sure of the nature or degree of intentionality of any of these differences. From the outset, the decision to include media literacy within a piece of communications (rather than education) legislation would have inevitable consequences for its formulation and interpretation: despite inferences to the contrary, no senior civil servants from the DfES were officially engaged in the policy development process, and no commitments had been forthcoming from them. In addition, the processes of drafting are inherently complex, with the

'mind of the minister' being interpreted by policy teams, and communicated to the Bill team who then instruct Counsel – in this case, amounting to a total of some 60 people. Changes in leadership at both departments may also have led to shifts in emphasis: Culture Secretary Tessa Jowell, for example, later claimed to have had a very direct hand in ensuring that media literacy was in the Bill, and that it included a 'critical' rather than a merely technological dimension (Jowell, 2006; interview Tessa Jowell, 14 June 2012). Cross-departmental work of any kind is bound to have its challenges, and in this case, there was at least the suggestion of tensions between the two: for instance, Peter Ainsworth MP referred to 'an undignified turf war' between the DCMS and DTI during the White Paper debate (Commons, 2000). Yet whatever the contributing factors may have been, the consequence is that when taken together, the documents speak with forked tongue.

Addressing the First National Media Studies GCSE Conference at the Institute of Education in London in May 2002, Cary Bazalgette, Head of Education Projects at the British Film Institute, compared the recently published Media Literacy Statement with the Draft Communications Bill, noting that while the former 'is recognizably related to the kinds of ideas that inform Media Studies', the latter is 'rather more firmly buried in the protectionist agenda':

Of course it remains to be seen how OFCOM will interpret these functions, and how they will relate to existing providers of education, from the DfES down. But the civil servants in charge of drafting the Bill assure me, that it is their intention that OFCOM's functions should relate closely to the Statement on Media Literacy. (Bazalgette, 2002)

The law, however, does not rely on the stated intention of civil servants, or on the policy narratives provided to accompany draft Bills. Acts of Parliament have to stand alone: what matters is the precise wording of legislation, and in this case, the inclusion of any more precise definition of media literacy was considered by the Bill team to be 'a bad idea', as one of its members described:

... this was actually a conscious choice. ... We cannot, sitting here (as it was) in 2002, we cannot predict what the precise need and form of this will be five years from now, or ten years from now, we are going to have to give the regulator basically the broadest possible description we can to work out what is sensible depending upon the circumstances at the time. (interview with civil servant, 23 June 2011)

This pragmatic view is, perhaps, an unsurprising one from a civil servant at drafting stage, although draft Bills are frequently amended in their journey through parliament, as each clause is scrutinised.

## **Parliamentary scrutiny of Clause 10**

Although two Commons Select Committee Reports pertaining to the proposed legislation were published between the White Paper and the Bill, neither dealt with media literacy, or even referred to it. However, the same cannot be said of the Puttnam Report. In a highly unusual step, the government set up a committee of both Houses of Parliament,

chaired by film producer and Labour Peer, David Puttnam, to scrutinise the draft Bill. This report describes Ofcom's role in relation to media literacy as 'pivotal' – a word not previously (or subsequently) used in any policy document relating to the promotion of media literacy – and supports the government's recommendation that responsibility for it should be assigned to Ofcom's Content Board.

The Joint Committee's three-month long investigation included the taking of evidence from a wide range of interested parties, policy-makers (including both Secretaries of State) and the Bill team itself. As such, Puttnam's report is actually a response to the draft Bill as *interpreted* by a number of mediators (earlier documents, including the White Paper and the policy narrative, as well as the assurances given by those involved in the development of the policy). For example, in his question to Tessa Jowell, the Liberal Democrat Lord McNally expressed the concern that Ofcom could become a body that 'knows the price of everything and the value of nothing and, therefore ... that more precise duties should be written into Clause 3 of the Bill in terms of the citizen' (Lords and Commons, 2002: para. 954). In her response intended to reassure the Peer, Jowell said: 'Part of the function of OFCOM, which is on the face of Bill [*sic*] but I think not yet sufficiently developed, which I think speaks very directly to the citizenship agenda/public interest agenda you have identified, is the development of media literacy' (Lords and Commons, 2002: para. 954). This reference to media literacy being a term 'not yet sufficiently developed' is picked up in the report, but without comment. This may seem surprising: a term acknowledged as being underdeveloped by the responsible Secretary of State is still being proposed as the basis for a 'pivotal' responsibility that is to be enshrined in statute. Puttnam's later explanation for his use of the word 'pivotal' sheds some light here:

Because we were struggling ... to establish what media literacy was, it needed to *pivot* around an organisation that was prepared to take responsibility for both exploring what it was, what it could be, and the ways it could be delivered. That's why it was a pivot. (interview David Puttnam, 20 January 2012)

Puttnam's position, therefore, was that Ofcom was best placed both to define this policy (something he later came to believe they had failed to do, 'not completely, but largely'), and to deliver it. In consequence, Clause 10 of the draft Bill appeared to have had the unreserved blessing of the Joint Committee; and this is one explanation for the fact that the wording of the draft Bill remained substantially unchanged when it was eventually published in November 2002. The very minor amendments that do appear at this stage are most likely to be the refinements of Counsel (rather than departmental policy officials), although in the process, Ofcom's 'function' reverts to a 'duty'. Perhaps because of this long pre-legislative process and the endorsement of the Puttnam Committee, the Hansard record of the Communication Bill Standing Committee (whose role it was to scrutinise the Bill clause-by-clause) reveals that there were again no objections or proposed amendments to Clause 10 (Commons, 2002). Instead, the debate centred on three main preoccupations. The first was the importance of the 'active participant' (as opposed to 'passive consumers') in media, and in particular the role of community media as a way of engaging people in media-making. Second, there was the need for media literacy to protect children against 'offensive or distasteful' material, and the

importance of such types of content being easy to identify (what Ofcom later referred to as 'labelling'). Third, there was a perceived need to help disabled and elderly people understand technology and how it could help them – a theme that emerged more strongly as Ofcom's policy subsequently developed.

## Conclusion

At first sight, it would seem that the emphasis on media literacy remained largely uncontested from its first articulation as a policy proposal through to its passing into law. Yet our comparative analysis of the policy discourses reveals profound disparities between what was actually included within the terms of the 2003 Communications Act and many of the features it was presumed to embody. At this moment in the story, as the requirement to 'promote media literacy' was enshrined in law, several significant shifts appeared to have taken place, and some key confusions and uncertainties remained. Whereas the digital technological environment had always been understood to be an aspect of media literacy, this had now become its defining rationale, and its only contextualising term of reference. Whereas early policy work presumed it to be an essentially educational project that would involve collaboration with schools and teachers (and with implications for the curriculum), there was now no such necessary or presumed link, and children were not specifically mentioned at all. Whereas media literacy had been broadly associated with generally recognised approaches to media education (as in the *Violence and the Viewer* report), and 'critical viewing skills' were seen to be fundamental to its educative purpose, this was no longer to be presumed. What had initially been proposed as a cross-departmental 'national campaign' for media education had significantly reduced in scope to become a limited set of additional duties assigned to a single regulatory body with no statutory responsibility for education at all. Ofcom was being given a responsibility to *promote* media literacy, but unlike most of its duties, had no power to enforce it: it was dependent instead upon what one of our interviewees called a 'sort of moral persuasive power, as opposed to hard regulatory power' (interview with senior Ofcom official, 6 May 2011). Whereas most of Ofcom's work was to relate to the regulation of the telecommunications companies, and was funded by them accordingly, under EC rules media literacy would have to be paid for by a direct grant from government, thereby distinguishing it from most of its other regulatory responsibilities (Lunt and Livingstone, 2012: 120). Perhaps most significantly, despite some six years of policy evolution, media literacy remained undefined, and it was effectively left to Ofcom itself to find a workable definition.

The emergence of media literacy in UK communications policy may usefully be understood in Darwinian terms as a process of adaptive evolution; its survival and development, a process of natural selection. As well as the actions and intentions of certain politicians and civil servants, environmental factors could be said to include political opportunism, the time constraints of the government's legislative programme, the outcome of a general election and cabinet reshuffles, the peculiar processes of parliament and, once on the statute book, the selective interpretation of law. As Stephen Ball (2008) has noted, the development of policy frequently involves such elements of 'serendipity' as well as deliberate intention.

By virtue of not being tied to a single and particular definition, media literacy was able to endure for some time as a suitably flexible tool for a range of diverse and changing policy concerns. However, by the same token, the lack of such a definition is what ultimately led to the 2009 *Digital Britain* report dismissing it as ‘a technocratic and specialist term understood by policy makers but not really part of everyday language’ (BIS and DCMS, 2009: 40). By the close of the era of New Labour, much of the discourse associated with media literacy was already becoming similarly affiliated with the emerging concept of *digital* literacy – a concept that is frequently understood in much narrower and more functional terms (Buckingham, 2010). From the broader educational and social-democratic aspirations that appeared to promise much at the outset, media literacy was steadily reduced to a limited set of concerns to do with protection from harm and with access to technology: it became a matter of what Robin Blake, the former Head of Media Literacy at Ofcom, described as ‘protecting kids from paedophiles’ and ‘getting grannies online’ (interview Robin Blake, 21 February 2011).

The making and implementation of policy is by no means a purely instrumental process, although it is sometimes represented in such terms. On the contrary, as Ball observes:

... in practice most policy works by accretion and sedimentation, new policies add to and overlay old ones, with the effect that new principles and innovations are merged and conflated with older rationales and previous practices. (Ball, 2008: 55)

The subsequent evolution of this policy – and the tensions and contradictions that characterised it – are issues that we intend to track in future research. However, at the point at which it became enshrined in UK law, media literacy already betrayed a strategic lack of clarity, as well as elements of compromise – if not contradiction – between what we have characterised as neoliberal and social-democratic discourses. In this respect, it can be seen as characteristic of New Labour policy more broadly, not just in the field of media (Freedman, 2008; Lunt and Livingstone, 2012) but also in education (Ball, 2008). Crucially, it was unclear to what extent, and in what ways, media literacy might become a concrete *educational* imperative, enshrined within school curricula, or merely a matter of generalised ‘good intentions’ on the part of an as-yet undefined group of public and commercial bodies, responding to the ‘moral persuasion’ of the regulator. Although we are continuing to work on the later instalments of this narrative, we would suggest that these limitations and problems have never been adequately resolved – and indeed that they partly account for the significant decline in interest in media literacy (at least at a policy level) in the closing years of New Labour.

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