

# Ofcom Plan of Work 2024/25: Summary of consultation responses

## Introduction

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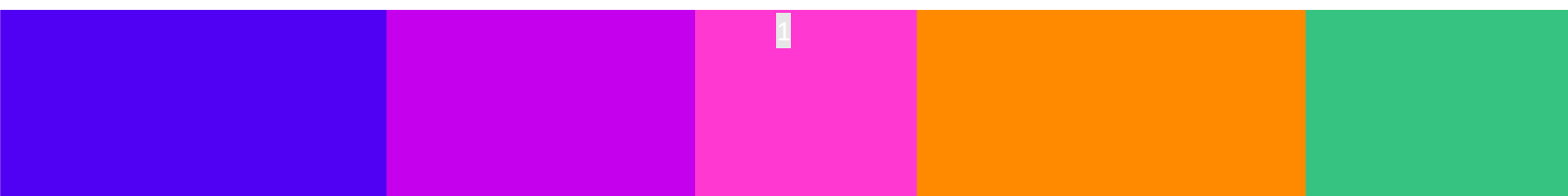
Ofcom consulted on its proposed Plan of Work 2024/25 between 15 December 2023 and 9 February 2024. During this time, we received 59 responses from a range of stakeholders representing the sectors we regulate, government bodies, consumer organisations, industry bodies and a small number of individuals. Where stakeholders gave permission, their responses will be published on the Ofcom website.

We also held four separate consultation events in London, Edinburgh, Belfast and Cardiff allowing stakeholders to engage directly with Ofcom on our plans for the year ahead. We are grateful to all those who took the time to respond to the consultation and/or join our consultation events.

The purpose of this document is to pull out some key themes from the consultation responses we received and offer an Ofcom response to this. The summaries are grouped into themes to reflect the structure of the Plan of Work i.e.

1. [Internet we can rely on](#)
2. [Media we trust and value](#)
3. [We live a safer life online](#)
4. [Enabling wireless services in the wider economy](#)
5. [Postal services](#)
6. [Cross-cutting areas and underpinning work](#)

As most policy programmes set out in the Plan of Work are subject to their own consultation process and timelines, our responses refer mostly to existing work, ongoing/upcoming consultations and published Ofcom material. In some cases, we have picked up specific points directly with stakeholders. Where stakeholders have requested their responses to be private and confidential, we have not referred to them in this document.



# 1. Internet we can rely on

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## PSTN switch-off and 2G/3G switch-off

- 1.1 **The general impact of the switch to new technologies was raised by a number of stakeholders including Comms Council UK (CCUK), Consumer Council Northern Ireland (CCNI), Consumer Scotland, Ofcom's Advisory Committee Northern Ireland (ACNI), Openreach, the Scottish Government, Trust Alliance Group, the Welsh Government and Which?. Points were made around the protection of vulnerable consumers through the migration from legacy services. The expectation was set by a number of stakeholders that Ofcom should monitor industry's progress and the impact it is having on consumers and take action to protect consumers from harm. CCNI and Scottish Government raised concerns around the impact on vulnerable consumers and whether Ofcom had a clear understanding of consumer vulnerability.**
- 1.2 **As old technologies are switched off in favour of new ones, some stakeholders also raised concerns about the protection of vulnerable consumers through processes such as the switch-off of 2G and 3G. Consumer Scotland requested further engagement with Ofcom around telecoms consumer protection in its wider role as the statutory consumer advocacy body in Scotland.**
- 1.3 The Public Switched Telephone Network (PSTN) over which fixed voice services have been delivered for decades, is now nearing the end of its life. The reports we receive from telecoms providers show a rising number of incidents associated with PSTN failures, and these types of incidents are on average having a greater impact. Our [Connected Nations 2023](#) report notes that 2023 saw a 20% rise in the number of PSTN incidents reported to us and a 60% increase in the number of PSTN service hours lost.
- 1.4 For the majority of affected customers, the move to VoIP-based landline service will be straightforward and will simply involve unplugging the phone from the wall socket and plugging it in to the router. Millions of customers have already made this move – 34% of landlines connections are now delivered via VoIP. In some cases, however, migration will be more complex, for example, users of telecare devices, customers with vulnerabilities and customers who rely on their landline in a power cut.
- 1.5 Ofcom's priority for the migration is to help ensure customers, particularly those who are vulnerable, are protected from harm during the migration. We have been clear with telecoms providers from the outset that they need to ensure they protect customers, particularly those who are vulnerable or dependent on their landline, when migrating them to VoIP.
- 1.6 We have [published guidance](#) and set expectations for telecoms providers. In particular:
  - We have set out standards ([The future of fixed telephone services](#)) on how providers should support and protect customers, particularly those who are vulnerable, including specific provisions on customers who use critical downstream services, such as a telecare device.
  - We facilitated the development of [best practice principles for IP migration](#) that covers detailed requirements for providers when migrating customers to VoIP, including support for vulnerable customers.

- We publish advice and information for consumers on our website ([Moving landline phones to digital technology: what you need to know](#)).
- 1.7 On 2G and 3G switch off, although the decision, timings and process are being led by the Mobile Network Operators, we want to make sure that consumers are treated fairly and can continue to access the services they need. [More information on timings and what it means for consumers can be found on our website.](#)
  - 1.8 We have highlighted the importance of mobile operators contacting affected customers with sufficient notice, and providing advice to them on the steps they need to take to continue to use their mobile service. Vulnerable customers, and particularly those struggling financially, will need to be given additional support, and we expect providers to take practical measures to help make sure they are treating vulnerable customers fairly, as set out in our [‘Treating vulnerable customers fairly’](#) guide.
  - 1.9 We have also engaged with consumer groups, such as Which?, to help promote awareness and to ensure any disruption is minimised.
  - 1.10 In addition to mobile handsets, there are a large number of third-party devices that could be impacted when 3G and then 2G switches off, including telecare alarms. We have written to the local government associations across the UK, as well as the [telecare sector](#), to reiterate the importance of ensuring continuity of service. We also highlighted the need to engage with suppliers of services which make use of 2G/3G networks to ensure any services will continue to work after switch-off.
  - 1.11 As well as setting standards, since 2019 we have closely monitored providers’ progress in relation to the migration to VoIP, and similarly for 2G/3G switch off since 2022. We collect data on a consistent basis from each provider and meet with each of them on a quarterly basis to discuss their progress, including their policies and processes for protecting vulnerable groups during the migration.
  - 1.12 Through our enforcement activities, we have also looked into providers’ compliance with our rules to help ensure consumers are protected during the migration. For example on, [Compliance monitoring programme](#) into access to emergency services during power outages and our [Investigation into Virgin Media’s compliance](#) with rules relating to vulnerable consumers and access to emergency organisations.

## Broadband information

- 1.13 **Which? said that following the recommendations of the GigaTAG (chaired by Which?) it was pleased that Ofcom had announced new rules in December 2023 to tackle consumer confusion about broadband technology. However, Which? expressed disappointment that these rules will not take effect until September 2024 and proposed that, once implemented, Ofcom should assess the effectiveness of this intervention.**
- 1.14 We welcome views about our new broadband information rules. In our [recent statement](#), we noted providers’ feedback about the need for some complex system changes and therefore considered that nine months was an appropriate implementation period.
- 1.15 We are currently engaging with providers to understand and monitor implementation of our rules and will continue to do so after implementation to help understand the impact of

our intervention. We are keen to continue to engage with Which? on improving customer understanding of broadband information.

## Scams

- 1.16 **On scams, stakeholders noted support for Ofcom’s work in this area but some concerns and further proposals were made. The Comms Council UK (CCUK) believes that tackling fraud and scams requires a more joined-up approach between the industry, the Home Office, Ofcom, national security and law enforcement agencies, as well as international organisations and regulators. The CCUK response warned that organisations undertake activity in silos, making it hard to maintain ongoing channels of communication.**
- 1.17 Telecoms scams are becoming increasingly complex, often involving different companies and sectors. One of the three pillars of our strategy is to take a coordinated approach to block and disrupt scammers. We will continue to collaborate and share information as appropriate, including with the Government, regulators, law enforcement and consumer groups, both in the UK and internationally. For example, we recently signed a Framework for Cooperation with the Federal Communications Commission in the US to help us crack down on scammers wherever they are. This year we will publish a statement, following our consultation on tackling scam calls, setting out our decision on our proposals to block spoofed presentation numbers calling from abroad. We will also continue our [enforcement programme](#) focused on identifying individual telecoms providers that allow scam and spoofed voice calls to enter the UK’s telephony system, and taking action against them.
- 1.18 **The Ofcom Advisory Committee for Scotland (ACS) appreciated Ofcom’s commitment to raising awareness about scams, but also drew out that, for Scottish households already in financial difficulties, the risks and impact of online scams and online fraud will be more extreme. It urged Ofcom to involve key platforms in the new online safety regime to prevent scams from the outset.**
- 1.19 Our [illegal harms consultation](#) sets out how we assess online risks of fraud and other illegal harms, how companies should measure and reduce it, and how we will take action against those who fall short. We also published a set of draft [codes and guidance](#) that specify what online services can do in relation to search results and content that is generated or uploaded by users to comply with the new rules. In these documents we have proposed some initial targeted steps to combat fraud. We welcome feedback on those proposals via our consultation process.

## Affordability

- 1.20 **A range of points were made by stakeholders including the Consumer Council Northern Ireland, the Scottish Government, the Trust Alliance Group and Which? in relation to the affordability of telecoms services for consumers, including on the availability and uptake of social tariffs and on mid-contract price rises. Which? encouraged Ofcom to make some of its voluntary codes of practice mandatory for providers. The Consumer Council Northern Ireland flagged similar concerns referring to the continued pressures on the cost of living and the additional burden this can place on vulnerable consumers, as well as the potential harm of accidental roaming charges since the reintroduction of roaming charges after leaving the EU.**

- 1.21 **The Advisory Committee for Scotland (ACS) recommended that Ofcom’s Scotland team continues to monitor and respond to Scottish issues around affordability in telecoms and awareness and take up of all options, including social tariffs. The ACS also highlighted the compound effect of financial difficulties across broadband, mobile and broadcast services for Scottish consumers in geographically challenging areas.**
- 1.22 **Which? noted its support of Ofcom’s various voluntary codes of practice but hope to see Ofcom consider making the scheme mandatory.**
- 1.23 Our [Communications Affordability Tracker](#) will continue to monitor and report on consumers’ attitudes and behaviours regarding the affordability of communications services, and how they change. We will publish findings from this research. We gave further updates on our work on social tariff availability, take-up, and consumer awareness in our 2023 pricing trends report.
- 1.24 In relation to voluntary social tariffs, Ofcom does not have the power to introduce regulated social tariffs without being directed to do so by the UK Government. We will, however, continue to help raise awareness of social tariffs, by undertaking further engagement with providers and by working with Government and consumer organisations, to help ensure more eligible households are aware of the help they can receive. We are also regularly engaging with Local Authorities in Scotland and Scottish Government to highlight social tariffs.
- 1.25 We note that several respondents have indicated support for our proposals to prohibit inflation-linked in-contract price rises. We will publish our decision on new rules to prohibit inflation-linked price rises this spring.
- 1.26 We have recently looked at the treatment by providers of customers who are in debt or have difficulty paying their bills. We have rules in place ([General Conditions of Entitlement](#)) regarding debt and disconnection or the fair treatment of financially vulnerable customers. When we updated our treating vulnerable customers fairly guide, we found no strong case to amend these rules. Instead, we strengthened our guide with additional good practice measures that providers could adopt to help make sure they are treating vulnerable customers fairly and delivering good outcomes for those customers.
- 1.27 On 22 March 2024, Ofcom published its decision to introduce new rules to protect customers when roaming. This includes a new requirement for providers to have measures in place to enable customers to reduce and/or limit expenditure related to inadvertent roaming while they are in the UK (e.g. treating Ireland usage as UK usage). These measures should particularly benefit customers in Northern Ireland.
- 1.28 Over the past five years, the automatic compensation scheme has worked well as a voluntary scheme which all of the large fixed telecoms providers are part of. The scheme now covers 93% of broadband customers and 89% of landline customers.<sup>1</sup>

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<sup>1</sup> These figures are correct as of December 2022 and no providers have joined the code since.

## Network security and resilience

- 1.29 **Ofcom's work to promote network security and resilience was a prominent theme across several responses from stakeholders including BUUK, Cellnex UK, Consumer Scotland, Eutelsat Group, Federation of Communication Services (FCS), the Independent Networks Cooperative Association, Ogi, the Scottish Government and the UK Competitive Telecommunications Association (UKCTA).**
- 1.30 **Cellnex UK encouraged Ofcom to keep pace with changes in the mobile market and sought to see the commercial deployment of vendor diversification. FCS noted that battery back-up is another pan-industry issue which would benefit from specific focus in Ofcom's Plan of Work.**
- 1.31 **UKCTA is also keen to engage with Ofcom on issues of national resilience and battery back-up. It noted that telecoms have become an integral part of national security, military, police and emergency services as well as everyday life. UKCTA also highlight the need to engage with stakeholders to ensure expectations on providers are realistic and cost effective.**
- 1.32 **CCUK noted concern that various attack vectors (TDOS, DDOS, SPIT) continue to be a risk to the sector, placing at risk various important services. It raised the question of how the small business end of the market engages with Ofcom on this.**
- 1.33 We are consulting on significantly revised network and service resilience guidance for communications providers. This includes our expectations on building services to minimise dependence on the internet and reduce attack vectors for critical services which could impact services. This consultation also includes a separate call for input on power backup for mobile radio access networks (RAN). The consultation and call for input closed on 1 March 2024. We intend to publish our statement with the updated resilience guidance, and next steps on mobile RAN power resilience, in summer 2024.
- 1.34 Ofcom, working in partnership with Digital Catapult, is supporting the UK Government's work to ensure a more competitive, diverse, innovative, secure, and resilient supply chain for telecoms through the SONIC (SmartRAN Open Network Interoperability Centre) Labs Open Radio Access Network testbed. The testbed will work to enable newer vendors' ability to test technology in a commercially neutral environment.
- 1.35 We also continue to share our insight and expertise with the Government across Future Telecoms issues, including as an observer member of the Telecoms Supply Chain Diversification Advisory Council and a member of UK Telecoms Lab (UKTL) Oversight Board.
- 1.36 **BUUK made points in relation to the Telecommunications (Security) Act 2021, outlining its concern about the potential for these provisions to place an undue burden on smaller suppliers, and the implications this could have for their growth/wider competition.**
- 1.37 **In this context of increased risk and threats, Eutelsat Group welcomed the UK legislative initiatives to enhance the security of telecom infrastructures. However, as a satellite operator, it emphasised the specific nature of satellite networks which complicate the implementation of these measures. It suggested international companies would greatly benefit from the implementation of a mutual recognition principle with regards to standards, that would link the UK and other key markets such as the EU.**

- 1.38 The Telecommunications (Security) Act 2021 places obligations on all providers of publicly available communications networks and services available in the UK, regardless of their size. The accompanying Telecommunications Security Code of Practice (the 'Code') published by DSIT gives guidance as to the measures to be taken to meet these obligations by providers of different sizes. As explained in Ofcom's own procedural guidance, we are undertaking a proactive compliance monitoring programme covering large (tier 1) and medium sized (tier 2) providers. While smaller providers (tier 3) need to comply with their legal obligations, including reporting any relevant security compromises to us, they are not expected to follow the measures in the Code, nor are they subject to this compliance monitoring programme.
- 1.39 We fully appreciate that there are wide range of providers in scope of the security provisions, and each has its own unique combination of network and service technology, architecture, global footprint, size and many other factors. Any consideration of what is appropriate and proportionate in terms of compliance for a given provider will need to take these circumstances into account.
- 1.40 Whilst Ofcom does not control the security legislation that UK and overseas governments choose to put in place, we do liaise with many international partners including regulatory and cybersecurity agencies. This helps us to build a common understanding of the security threats facing the companies we regulate, and the appropriate regulatory responses.

## Telecoms Access Review

- 1.41 **Many stakeholders noted the upcoming Wholesale Fixed Telecoms Market Review (or 'Telecoms Access Review') and made early representations about this. The Independent Networks Cooperative Association suggested a review of Physical Infrastructure Access (PIA), what works and what needs to change to ensure equivalence between Openreach and PIA customers, including pricing principles, products, processes and costing.**
- 1.42 **Openreach noted concern that investment still is needed to update UK infrastructure and that the 2021 WFTMR Framework "did not reach firm conclusions on copper services". The FCS welcomed the WFTMR but said more work is needed on industry convergence and IP infrastructure. It proposed that Ofcom should undertake focused work looking at competition issues within the wholesale market.**
- 1.43 **BUUK expressed the view that the Telecoms Access Review should act as a critical market review due to significant changes (fibre rollout, copper retirement, PSTN switch off). Independent Networks Cooperative Association also expressed concern about the timeframes of the review while Scottish Government hope it will consider hard to reach communities and Vodafone UK proposed that Ofcom should recognise the pressures retailers face from wholesale costs and the shifting balance of accountability.**
- 1.44 We will be starting the Telecoms Access Review 2026 in spring 2024 and as stated in our proposed Plan of Work, we aim to publish our main consultation in Q4 2024/25. We will begin gathering data to inform our review shortly which will provide stakeholders with the opportunity to share relevant information with us. Stakeholders will also have the opportunity to share their views with us during the consultation so that we can take these into account in any subsequent decisions we make.



- 1.45 As that work begins, we will continue to monitor Openreach's performance and PIA operations under our current regulations.
- 1.46 **The UK Competitive Telecommunications Association (UKCTA) raised concerns about Ofcom's work on the Openreach Monitoring Unit (OMU). It stated that, in the last year there has been "little engagement with stakeholders to obtain views on Openreach's performance" and expressed disappointment that Ofcom "failed to conduct the evidence gathering necessary to produce a meaningful OMU report in 2023". UKCTA said it expects to see more stakeholder engagement to produce an effective report this year.**
- 1.47 The OMU does not sit in isolation from wider stakeholder engagement across Ofcom. Our wider stakeholder engagement across Ofcom continues to feed in to and support the OMU's wider understanding of industry views on Openreach performance. We also continue to encourage stakeholders to bring issues directly to us via direct contact with the OMU when they are concerned, so that we can proactively address those concerns in real-time. Ofcom recognises the important role Openreach monitoring has in this key period and will continue supporting the open, proactive and productive dialogue we have been having with stakeholders as we begin to plan our next report.

## Switching and numbering

- 1.48 **Stakeholders including the Citizens Advice Scotland, Comms Council UK (CCUK) and Which? raised concerns around switching, in particular the delays to the One Touch Switch process. One response requested that Ofcom insist that ISPs allow consumers to keep their email address if they change supplier. Ogi emphasised the need for continued collaboration with industry to overcome technical challenges related to One Touch Switching.**
- 1.49 In light of the delay to industry's implementation of the One Touch Switch process, we have opened an Enforcement Programme to closely monitor the progress of relevant providers and ensure that One Touch Switch is delivered to a high standard as quickly as possible in order to realise the benefits of easier switching for broadband and landline customers.
- 1.50 TOTSCo has announced a new industry-wide launch date of 12 September 2024. The continued delays by industry have ultimately caused customers to lose out on the benefits of a quicker and more effective switching process. Once OTS has launched and based on the evidence gathered under our industry enforcement programme, we will determine whether it is appropriate to open investigations into individual providers.
- 1.51 While a number of broadband providers make email addresses available as part of their broadband service, this is not something that they are required to do, and Ofcom does not directly regulate these email services. We have published advice for consumers about the options that may be available to keep their email address when switching, and about considering a move to an alternative email provider.
- 1.52 **Magrathea noted that number portability can be an issue for business-focused service providers and the Federation of Communication Services (FCS) noted that, while it supported Ofcom's new switching regulation, it would like the Plan of Work 2024/25 to also consider the switching needs of business customers.**



- 1.53 In relation to number porting, in our February 2022 statement, we said that it is important that industry takes into account the interactions between switching and porting in the implementation of new switching processes. In our September 2021 statement and consultation, we explained that we do not consider it appropriate to mandate that industry follow a particular process for business switches in our new switching rules because business customers may have different needs when switching compared to residential customers. We asked the Office of the Telecommunications Adjudicator in September 2023 to work with industry to develop and implement changes to number porting best practice to support a better switching and porting experience.
- 1.54 **The FCS was disappointed to see no mention of the Common Telephone Numbering Database (CDB) in the Work Plan. Magrathea and CCUK also mentioned the work it has done to draw out the benefits of a common numbering database and ask Ofcom to reinstate work on this.**
- 1.55 In our CLI [consultation](#) we discussed the role of a common numbering database in the UK to support CLI authentication methods. We noted that such a database may serve many purposes for providers and the associated industry (such as to facilitate porting, routing and number management), but that these were out of scope of our consultation. In our CLI authentication roadmap in February 2024 (Calling Line Identification (CLI) authentication assessment update and future roadmap) we explained that we would not proceed with CLI authentication at that time, and instead explore other solutions. In this context, we are not currently examining the introduction of a common numbering database in the UK.
- 1.56 **The UK Competitive Telecommunications Association (UKCTA) welcomed Ofcom’s work to continue its strategic review of the telephone numbering plan. UKCTA stated it has frequently asked Ofcom to put in place rules to stop the consumer harm caused by so-called Information, Connection and Signposting Services (ICSS).**
- 1.57 We have set out proposals, as part of our consultation on the future regulation of phone-paid services, to impose new requirements to protect consumers from harms associated with Information, Connection and Signposting Services (ICSS). Most importantly, we have proposed to require ICSS merchants to provide pre-contract information for free, in line with our general consumer protection policy objectives. We also proposed to prohibit the merchant from providing the service until the merchant obtains consent from the consumer in a specific manner.

## Mobile coverage

- 1.58 **Cellnex UK highlighted the need for improved mobile coverage and quality of reporting to support consumers and industry. It proposed that this could benefit the industry and promote the sharing of mobile infrastructure.**
- 1.59 Ofcom regularly updates its mobile coverage checker which enables users to view predicted mobile coverage in different locations across the UK. We are in the process of carrying out a review of this checker and are always considering ways in which the checker, and the data that feeds into it, can be improved. Ofcom also includes information on mobile coverage and performance in the Connected Nations publication, providing a high-level view of UK and MNO-specific mobile coverage and performance.

- 1.60 **The Welsh Government also remain concerned that the Mobile Network Operators (MNOs) delivering the Shared Rural Network (SRN) programme will not deliver on their commitments to extend 4G in Wales by the deadline of June 2024.**
- 1.61 Ofcom is preparing to undertake a compliance assessment in the summer of 2024 to ensure the MNOs have delivered on their commitments.

## Broadband coverage and USO

- 1.62 **Several respondents spoke about broadband coverage and connectivity in their responses. The Welsh Government stated that performance criteria do not reflect the growing digital needs of residents and businesses and argued that the Plan of Work should be clearer on how Ofcom will drive the reach of both broadband and mobile connectivity and address connectivity issues for the hardest to reach premises.**
- 1.63 **Some other general points were made around the USO. Which? believes the minimum service requirements should be reassessed and adjusted and that Ofcom should commission a full analysis of household dependency and usage. BT suggested that the time is now right for Ofcom to consider a request for compensation for the cost of delivering the broadband USO. Meanwhile the Scottish Government sought collaboration and engagement around the broadband voucher scheme.**
- 1.64 The minimum service requirements of the broadband USO are set out in legislation and any changes to them would be a matter for the UK Government. In October 2023, the UK Government published a consultation seeking stakeholder views on what has worked well with the USO and what could be improved, including some of the minimum service requirements. The consultation closed at the end of November 2023 and the Government will be reviewing responses to decide next steps. We are working closely with the Government as it progresses its work in this area.
- 1.65 On broadband coverage, we are continuing to monitor the implementation of the USO but as noted in our Connected Nations 2023 report, most of the remaining premises without access to decent broadband are likely to exceed the £3,400 cost threshold set out in the USO. These premises that are the most expensive to connect are likely to need alternative solutions. This issue was also consulted on and we will continue working with the UK Government on improving broadband access for very hard to reach premises.
- 1.66 If BT wishes to submit a claim for compensation for the cost of delivering the broadband USO we will consider it in accordance with the process set out in our 2020 Funding statement and regulations.
- 1.67 We welcome our ongoing engagement and collaboration with the Scottish Government on the broadband voucher scheme and ensuring that we are sharing relevant data to inform our Connected Nations reporting.

## Support for businesses/industry

- 1.68 **The Comms Council UK (CCUK), the Federation of Communication Services (FCS) and Magrathea expressed support for a ‘business champion’ to represent the business community in Ofcom’s policy decisions. The FCS suggested that Ofcom should have a greater focus on business customers. Similarly, the CCUK raised the question of support for smaller businesses.**

- 1.69 Having a deep commercial understanding of the markets we regulate is imperative to carrying out our duties as a regulator. We will focus on these capabilities by recruiting colleagues with commercial experience, using secondments, and continuing our programme of commercial and consumer research. We recognise that Voice Markets are particularly important markets for business, and we expect the Voice Review to consider the functioning of these markets for all customers including business customers.

## Digital markets/Voice review

- 1.70 **On Digital Markets, BT suggested that Ofcom should take a more holistic approach to regulating ‘Number independent interpersonal communications services’ (NIICS) and consider it in the context of the Digital Markets, Competition and Consumers Bill. BT stated that there have been substantive developments in voice markets since 2021, noting the emergence of NIICS and the migration of customers to all-IP services. Its response stated that Ofcom should set out a clear strategy for future SMP regulation of voice services including whether it expects this to remain appropriate in the longer term.**
- 1.71 **An overall point was made by the Comms Council (CCUK) around its members’ concern that the proposed Plan of Work pays too little attention to voice services. It believes Ofcom places “too great a focus on a small number of large, vertically integrated communications providers” when assessing the current telecommunications market.**
- 1.72 We have begun scoping our 2026-31 Wholesale Voice Markets Review. This will include an assessment of the relevant fixed and mobile call termination markets, taking account of any relevant technological developments, and whether customers’ (both business and residential) usage habits have changed since our previous review. We will engage with a range of stakeholders to inform our assessment and welcome early discussions with interested parties. As stated in our draft plan, we currently plan to publish our main consultation in Q1 2025/26 and our regulatory decisions in Q4 2025/26.

## Pay TV providers

- 1.73 **BT said Ofcom should ensure all pay TV providers are fully compliant with existing consumer protection regulations.**
- 1.74 BT refers to an appeal brought by Sky against an Ofcom decision in which we found that certain of Sky’s pay TV services were electronic communications services and that our consumer protection rules applicable to such services therefore applied to those services. We will consider our next steps following the outcome of the appeal.

## 2. Media we trust and value

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### BBC duties and performance

- 2.1 **Better Media suggested that the review and oversight of the BBC's public service role and duties should be more open to the public, including civic engagement practices such as public consultation. It would like more information, reporting and data to be published in more accessible formats that recognise the varied needs of consumers and citizens.**
- 2.2 **The Scottish Government strongly believed the BBC must represent the whole of the UK, and that a robust, publicly funded BBC is a vital part of the ecosystem which maintains investment in Scottish-produced content, develops Scottish talent and companies, and supports creative industries more widely. This view was also expressed by the Advisory Committee for Scotland, who noted the need for engagement and transparency by the BBC on its plans in the Nations. The Advisory Committee for Northern Ireland noted that it is focused on ensuring the benefits of public service broadcasting are fully delivered in NI.**
- 2.3 Under the BBC Charter and Agreement, the BBC Board is responsible for ensuring that the BBC delivers its remit, and for setting the strategic and creative direction of the organisation. Ofcom's role is to hold the BBC to account for delivering its remit. We have set out how we [regulate the BBC](#), and consult on changes to our regulation.
- 2.4 The BBC publishes a number of reports during the year, including an Annual Report. We publish an Annual Report and an interactive data report on the BBC setting out how we have carried out our duties, and on the BBC's performance in delivering its Mission and Public Purposes.
- 2.5 This includes reporting on the delivery of its creative remit in the nations and regions. We recognise the importance of the BBC in supporting the creative sector across the UK. We will continue to report on the BBC's compliance with its production quotas, that require a proportion of network output and spend to be attributable to production in each of the nations, as well as report on levels of investment in non-network content, as part of our annual report.
- 2.6 **The Welsh Government commented on the ability of the BBC to address complaints in a timely, comprehensive manner, stating that although the BBC First complaints process was "fit for purpose", it believed that there was room for improvement.**
- 2.7 We continue to monitor the BBC First complaints process to ensure that it is transparent and works well for audiences. In 2024 this will include carrying out mystery shopping research on the BBC's complaints system to gauge the effectiveness of the changes the BBC has made. In addition, following the Government's Mid-Term Review of the BBC, we will be reviewing a representative proportion of the BBC's final decisions that are not escalated to us.

### BBC impact on competition

- 2.8 **The News Media Association urged Ofcom to adopt a more proactive stance in holding the BBC to account for its impact on local media markets. It welcomed Ofcom's work on media plurality and noted that Ofcom will continue to monitor the impact of the BBC's**

**public service and commercial activities on the market, to ensure it does not have an undue impact on competition.**

- 2.9 One of the recommendations from the Government's BBC Mid-term Review was for Ofcom to publish our view of the BBC's impact on the local news sectors. This will form part of our Local Media Review. We will publish our findings toward the end of 2024.

## Media Bill

- 2.10 **The Media Bill, once it becomes law, will determine a significant amount of work for Ofcom in the coming year, as indicated in our proposed Plan of Work. There were a number of responses making points concerning the Bill from a range of perspectives.**
- 2.11 **Directors UK were concerned that the potential removal of specific genre obligations from the Public Service Broadcasters' (PSBs) remits may lead to some genres being under-served, negatively impacting the range of content available. They also considered that if this content is no longer required on the PSBs' main linear channels, but through online services only, some viewers may not be able to access it.**
- 2.12 **Directors UK considered that diversity of PSB content is at risk from under-represented groups leaving the television industry's freelance workforce. They also believed that more should be done for the freelance film industry work force in general.**
- 2.13 **Local Television Network (LTVN) and Comux were concerned that the Media Bill does not include local TV in its provisions. The Scottish Government were concerned about the potential changes in the Media Bill to Channel 4's publisher-broadcaster model. The Welsh Government hopes to work with Ofcom to implement any relevant Media Bill changes.**
- 2.14 The UK Government introduced a Media Bill to Parliament in November 2023. The Media Bill will, when it becomes law, make changes to the legal framework for the regulation of Public Service Broadcasting, radio services and VoD services. We have updated our Annual Plan of Work to reflect our current understanding of the changes in the Media Bill and approach to the work involved in implementation. In February 2024, we published our [Roadmap to regulation](#) and implementation plan, including how we propose to engage and consult with stakeholders.
- 2.15 In the Roadmap we set out our proposed process to implement changes to the PSBs remits and licence obligations as a result of the Bill. In some areas, the PSBs will have more flexibility as to how they serve audiences across broadcast and on-demand services. They will be required to publish annual statements of programme policy (SoPPs) that include the services they will use to deliver their remit and the contribution these will make. We will consult on the changes to the licences, and requirements and guidance for the PSBs in preparing SoPPs.
- 2.16 A number of our duties relating to UK broadcasters are linked to the UK TV production sector. While these do not apply to the film industry, we are aware that many producers and freelancers work across both sectors, and they can share common challenges and opportunities, some of which were identified in [research we commissioned on the UK TV production sector in 2023](#). Our view remains that the regulatory framework for broadcasting should continue to support the UK creative economy, driving economic benefits across the nations and regions.

- 2.17 The Media Bill removes the restriction on Channel 4 Corporation (C4C)'s involvement in programme-making. Alongside this, the Bill puts in place requirements on C4C to facilitate fair competition for commissions and requires C4C to prepare an annual statement about its commissioning policy to be reviewed by Ofcom. The UK Government has indicated that it intends to bring these new duties into force only when C4C establishes a production business. We will then consult on guidance for C4C on preparing its statement of commissioning policy.

## Diversity in UK broadcasting

- 2.18 **The Scottish Government and Directors UK supported Ofcom's work to increase both on and off-screen diversity, and our work to facilitate conversations and promote equity, diversity and inclusion. Directors UK wanted Ofcom to set out how it will use these findings to hold the broadcasters to account and urged Ofcom to request broadcasters to provide wider freelance workforce data collected by Creative Diversity Network's (CDN) Project Diamond.**
- 2.19 **Better Media was concerned Ofcom may fail in its Equality Act duty if it did not include community media and independent forms of media in its data collection.**
- 2.20 Ofcom's powers enable us to monitor equality of opportunity and diversity within broadcasters' own workforces – including freelancers working directly with broadcasters – but do not extend to monitoring the make-up of the wider freelancer community. Given the vital role that freelancers play in the sector we continue to use our influence to strongly encourage greater cooperation between broadcasters and other key sector stakeholders in relation to freelance diversity and inclusive commissioning policies and processes. These actions, along with our annual report assessing the EDI (equality, diversity and inclusion) progress made by UK TV and Radio broadcasters, remain our key tools for holding broadcasters to account.
- 2.21 We fully recognise the important role community radio plays in creating and building diverse talent pipelines. Our latest report included workforce data requested from community radio services as part of benchmarking exercise to survey the EDI of all licenced TV and radio broadcasters. For our 2023-24 report, we will limit our workforce data request to TV and radio broadcasters with 20 or more staff, both to reflect the statutory obligations on promoting equality of opportunity which do not apply to the smallest broadcasters, and to minimise the regulatory burden on small licensees. All broadcasters will continue to be able to access our EDI self-assessment tool to support them in developing their organisational EDI approach.

## Local Media Review

- 2.22 **Our Local Media Review was welcomed by stakeholders, including the Scottish Government and Radiocentre. The Local Television Network (LTVN) and Comux noted some issues to be considered in the review: the demarcation between local and regional content; access by local TV to footage of major events and public interest events (such as Crown Courts); and funding for local journalism.**
- 2.23 **The Advisory Committee for Scotland (ACS) said audiences in Scotland both need and want to see an authentic representation and portrayal of their communities across radio**

**and TV. The ACS considered it is important that Ofcom continue to recognise localness as a benefit, rather than a burden.**

- 2.24 Our Local Media Review is looking at the provision, role and value of local media. As set out in our terms of reference, this will include additional research to build on our current understanding of what audiences need and value from local services. Our work will also look at current local media provision and how it is evolving as audiences are consuming more information online, as well as the value local media delivers to consumers and wider society. This will include engagement with a range of stakeholders across the UK, including local news bodies in Scotland. We will publish the findings of our review toward the end of 2024.

## Local TV

- 2.25 **The Local Television Network (LTVN) and Comux urged Ofcom to do everything possible to prepare for the Local TV licence renewals, in particular through establishing a light touch and rapid process. It was eager to understand the assessment criteria for renewals. It welcomed a commitment from Ofcom that the renewal process will be expedited for both the multiplex operator and individual licensees, and would welcome clarity regarding sequencing and conditions for the renewal process.**
- 2.26 Ofcom acknowledges the request from LTVN and Comux for the renewal process to be expedited. The process was set out in the UK Government's response on the renewal of local TV services. Our intention is to publish a statement between the laying and implementation of the Statutory Instrument. This statement will explain Ofcom's timeline to complete the renewal process by the end of 2024, including what we expect to happen should Ofcom take a decision to not renew a particular licence.

## Commercial radio regulation

- 2.27 **The Scottish Government welcomed our work to deliver improvements across commercial radio and will be closely following the proposed work on the provision of local radio content following the Media Bill. It believed it is important that format removal does not negatively impact the diversity of radio across the nations, or the specific needs of communities to be kept entertained and informed with locally relevant content.**
- 2.28 **Radiocentre, responding on behalf of the commercial radio industry, expressed its interest in new 'localness' guidelines. Maxxwave requested that Ofcom consult on the application of clause 42 of the Media Bill, which relates to how analogue commercial radio licences are awarded and renewed. Better Media, Bucks Radio/Buckinghamshire Media, Leicester Community Radio, Petersfield Community Radio, Rutland & Stamford Sound CIC also raised similar concerns.**
- 2.29 Our published [Roadmap](#) sets out our proposed plan for implementing the changes that will be made by the Media Bill when it becomes law. This includes removing many of the longstanding regulations relating to programming on local commercial radio stations, although the requirement for these services to provide local news and information will remain. The process by which analogue commercial radio licences are awarded will also be changed by the Bill, as three of the four existing statutory criteria to which Ofcom must have regard in the context of licence awards relate to programming output. Clause 42



provides Ofcom with the flexibility to determine how we may award analogue commercial radio licences in the future. However, the Bill does not, as asserted in a number of responses, compel Ofcom to undertake any such licensing, nor does it set out a statutory timeline.

## Small scale DAB

- 2.30 **Radiocentre expressed concern about the rollout of small-scale DAB and believe Ofcom should conduct an evaluation of the regime to check if it is delivering on its original objectives. Better Media, Maxxwave, UK Community Radio Network and others proposed a review of “the 40% limit” on the overlap between small-scale DAB and local radio multiplexes.**
- 2.31 Ofcom is committed to completing delivery of Rounds 5 and 6 of Small-scale DAB multiplex licensing in 2024/25. Once complete, we will then consider how best to utilise our resources to serve audiences across the UK more generally, taking account of the market conditions at the time and our functions and duties in respect of other licensing opportunities.
- 2.32 We plan to publish a second small-scale DAB progress report later this year, to follow the report published in May 2022.
- 2.33 Our position on the “40% limit” is set out in paragraphs 4.18–4.31 of our [Licensing Small-scale DAB statement](#). In particular, we consider the rationale for our current approach as set out in paragraphs 4.29 and 4.30 is still appropriate and therefore our planned progress report will not include a review of the “40% limit”. Community radio
- 2.34 **Better Media would like to see a review of the licence revocation rules for community radio to remove licences from inactive stations. Maxxwave would like Ofcom to reconsider the criteria for refusing analogue licence requests based upon the lack of spectrum or viability of services based upon spectrum.**
- 2.35 **Banbury FM was concerned that deregulation of existing analogue licences, combined with the opportunity for Ofcom to accept on-demand applications for new analogue entrants, will have a negative effect on localness.**
- 2.36 As set out above, local commercial radio licences will be required to retain local news and information as part of their programming output under the changes that will be made by the Media Bill. In addition to this, analogue community radio services continue to provide locally-produced content to their target audience, ensuring that the content they broadcast is relevant to the audience they serve. We have powers to take enforcement action against a licensee that we believe is providing insufficient locally-produced content to comply with its ‘Key Commitments’.
- 2.37 Analogue community radio stations are required to broadcast throughout their licence period. However, there are a number of reasons that a community radio station could temporarily come off-air, some of which may be outside the licensee’s control. Where Ofcom has found a licensee is in breach of its licence for failing to broadcast, Ofcom has the power to impose sanctions which include imposing a financial penalty on the holder of a community radio licence or revoking the licence. Ofcom considers that it is generally in the interests of listeners to receive a community radio service for the full licence period and to give licensees an opportunity to ensure compliance with their licence conditions.

Before revoking a broadcasting licence, Ofcom must be satisfied that it is in the public interest to revoke the licence.

- 2.38 Ofcom has periodically reviewed its analogue radio coverage policy and the technical assumptions that underlie that policy. We have no plans to review that policy again in the current year, not least because we are not currently planning or licensing any new analogue radio stations.
- 2.39 **On Air Radio considered that it is vital for Ofcom's plans to include work to allow applications for new analogue radio entrants. UK Community Radio Network (UKCRN) urged Ofcom to do more work around the development of community radio. It asked that Ofcom continue to provide resources for applications for coverage expansions and improvements and would like Ofcom to continue to support stations who wish to, or need to, move their transmitter. It believes there continues to be a demand for FM radio and would like Ofcom to consider carrying out work to understand the level of interest and demand for new FM community radio stations.**
- 2.40 Our Plan of Work states that we will continue our ongoing licensing work, which will include the consideration of technical changes, including extensions and improvements for existing analogue services.
- 2.41 Ofcom is committed to completing delivery of Rounds 5 and 6 of Small-scale DAB multiplex licensing in 2024/25. Once complete, we will then consider how best to utilise our resources to serve audiences across the UK more generally, taking account of the market conditions at the time and our functions and duties in respect of other licensing opportunities.
- 2.42 Ofcom welcomes the response from UKCRN with regard to our continued engagement with the Community Radio sector.
- 2.43 We will endeavour to be more proactive in our communication with stakeholders if there are delays in our ability to deal with requests.
- 2.44 **The UKCRN also requested that Ofcom formally considers multiyear or two-year applications to the Community Radio Fund.**
- 2.45 We will consider this under the existing Guidance Notes for the Fund, consulting with the Community Radio Fund Panel who take the decisions on funding awards.

## Made outside London programme titles register

- 2.46 **Teledwyr Annibynnol Cymru (TAC) would like Ofcom to review the guidelines to PSBs for out-of-London and regional production in Wales, particularly the 'substantive base' criteria, and the reporting of these through the annual register of productions, including making this information available closer to the time of commission.**
- 2.47 Ofcom reviewed the regional production and regional programming guidance for PSBs in 2019. We published a [statement](#) and updated guidance for the PSBs; this came into effect for programmes broadcast from January 2021.
- 2.48 In the statement we strengthened the guidance criteria (including the substantive base) for qualifying regional productions, and also the processes for reporting, spot-checks and complaints on compliance with them. Based on our analysis of the data included in the broadcasters' annual returns, spot checks of productions and ongoing engagement with

stakeholders, including TAC, we remain of the view that these changes have brought more rigour and accountability to the regional TV production regime.

- 2.49 Productions can only be counted towards the regional production quota once they have been broadcast. The 'Made outside London' programme titles register sets out the titles of programmes broadcast in a calendar year that the BBC, ITV, Channel 4 and Channel 5 reported as 'Made outside London' productions. These are reported by the PSBs as part of their compliance with production quotas in annual returns following the end of the year.

## MG ALBA

- 2.50 **The Scottish Government would welcome a much broader reference to MG ALBA as it believes there is an imbalance in the consideration given to Gaelic compared to Welsh, and considered Ofcom should recognise the needs and challenges facing MG ALBA. It considers the inclusion of a reference to support the UK's indigenous languages and the role of MG ALBA as an important and continuing part of supporting a diverse, pluralistic broadcasting landscape in Scotland.**
- 2.51 We recognise the valuable contribution MG ALBA makes to Scotland's broadcasting landscape and engage with them regularly as we carry out our statutory duties relating to the organisation and in their role as a partner with the BBC in operating the BBC ALBA service. In the year ahead, we will appoint a number of new Members to the Board of MG ALBA to strengthen its leadership and also look forward to seeing the revised partnership agreement between MG ALBA and the BBC.

## 3. We live a safer life online

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### Ofcom approach to implementing the online safety regime

- 3.1 **A broad range of points were submitted by stakeholders regarding the Online Safety Act and Ofcom's approach to implementing the online safety regime.**
- 3.2 **Which? supports Ofcom's work to implement the new Online Safety Act regulatory regime and asks Ofcom to ensure that robust obligations are in place to tackle online fraud. It argued that Ofcom should require online services to carry out due diligence checks to prevent fraudsters from using online services.**
- 3.3 **The Online Safety Act Network expressed concerns that the proposals set out in the Illegal Harms consultation do not have the necessary focus on systems and processes required to deliver the step-change envisaged by the Online Safety Act. The Network is concerned that Ofcom's approach will instead impose a rules-based regime that enforces the status quo. It believes more information is needed to explain how Ofcom will continuously iterate its approach to tackling illegal harms.**
- 3.4 The new online safety rules are planned to be deployed in three phases, with the timing driven by the requirements of the Act and relevant secondary legislation. The implementation [plan](#) we published in October 2023 reflects this phased approach. We will act as swiftly as possible to implement the online safety regime while also ensuring we test our work through fair, open and transparent consultation. We do appreciate the effort involved in responding to our consultations and note that our work is made possible

through constructive and frank feedback from stakeholders. We do consider both the burden associated with responding to, and accessibility of, our published documents. In respect of the Illegal Harms consultation, we appreciate that as we were consulting on a number of different regulatory documents in tandem, and it was important that Ofcom's consultation documents included sufficient reasoning in support of our proposals, the published materials were lengthy and detailed. Recognising this, for the Illegal Harms consultation, we produced a number of accessible materials to support stakeholders' understanding, and produced three open webinars to explain our proposals.<sup>2</sup> We intend to focus on making our documents as accessible as possible as the regime evolves.

- 3.5 The illegal harms consultation closed on 23 February 2024. We are currently considering the responses provided by a range of stakeholders including from civil society, regulated services, public bodies and other entities. We will address the substantive points raised in our statement, and we will also seek to provide more clarity on our plans to iterate the codes over time as our evidence base and understanding grows.
- 3.6 Our current planning assumption, based on our previous experience of large regulatory publications, is that we may issue statements around one year following the relevant consultations. We anticipate that some timelines may be subject to variation depending on stakeholder engagement outcomes and other relevant factors.

## Stakeholder engagement

- 3.7 **Across a range of responses, points were made about Ofcom's approach to stakeholder engagement. Some respondents requested further transparency around Ofcom's stakeholder engagement and partnership work, for instance with civil society organisations and international regulators.**
- 3.8 We have engaged extensively with a broad range of stakeholders – including civil society organisations – over the last three years. This has been critical in helping us to build the evidence base that underpins our first set of draft codes and guidance and will continue to be fundamental to us developing a regime that makes life online safer for all UK users.
- 3.9 International collaboration is also critical given the global nature of the challenges that we're seeking to address. The Global Online Safety Regulators Network (GOSRN) has provided an important forum for us to share and discuss best practice with regulatory counterparts and in our role as Chair for the 2024 we are seeking to build on the work already done by the Network. As part of this, the Network will be publishing a statement on regulatory convergence in the coming months.

## Protection of children

- 3.10 **A specific point was raised by the Welsh Government about encouraging greater regulatory focus on online safety for younger people accessing content in the Welsh language. Anecdotally it is aware of instances of the Welsh language being used in a negative way by scammers, with confusing and inappropriate targeting of younger users.**

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<sup>2</sup> Our webinar introducing the Online Safety Act and our illegal harms consultation can be found [here](#). We also presented deep dives on our [risk](#) and [codes](#) proposals separately.

- 3.11 The Welsh language has official status in Wales. To give effect to this, certain public bodies, including Ofcom are required to comply with Welsh language standards. We have set out our Welsh language assessment as part of our illegal harms consultation and sought feedback on this via the consultation process.
- 3.12 Our forthcoming consultation on the duties in the Online Safety Act related to the protection of children will also include a Welsh language assessment and we welcome feedback as part of this consultation process.

## Supervision of platforms

- 3.13 **Trust Alliance Group (TAG) welcomes Ofcom’s commitment to supervising platforms and utilising transparency reporting powers to gauge the effectiveness of systems and processes, and to incentivise further improvements. TAG suggested that establishing user access to impartial Digital Dispute Resolution would help capture real consumer experiences.**
- 3.14 The Online Safety Act requires Ofcom to produce a report assessing services’ measures to comply with their reporting and complaints duties. As part of that report, Ofcom must advise the Secretary of State on whether to make regulations requiring services to establish alternative dispute resolution procedures. Ofcom must publish that report within two years of the relevant provisions of the Online Safety Act entering into force.

## Video-Sharing Platforms

- 3.15 **Some stakeholders requested further information on our regulation of VSPs.**
- 3.16 We have published a number of enforcement [bulletins](#) showcasing positive service improvements as a result of enforcement action. We expect to continue shining a light on our enforcement efforts and the positive outcomes we have observed.
- As detailed in [Ofcom’s approach to online safety implementation report](#), as well as the [VSP Strategy Refresh Report](#) some of our goals include: Driving improvements in the biggest services, while also providing information and support to smaller services and helping them understand enforcement processes.
  - Promoting transparency, 1) about services’ safety measures as exemplified by our 2023 VSP reports on [user policies](#) and [child safety](#), 2) Ofcom’s own transparency, being accountable to Parliament and the public and tracking the impact of regulation and its benefits to users, and 3) openly engaging with civil society groups, expert bodies, law enforcement agencies and international policymakers.
- 3.17 We are committed to continuing to develop our approach to measuring the effectiveness of safety measures. For example, the work we are doing within the World Economic Forum seeks to assess how platforms should approach digital safety risks and measure the impact of their interventions ([VSP Report](#)).
- 3.18 We will continue to measure the success of the regime and be transparent about it. It is in our plans to publish a report on our key learnings from the regime as a whole ahead of repeal.
- 3.19 We will be producing more guidance soon regarding repeal of the VSP regime, and we will continue to be in touch with platforms to notify of any changes. We are currently in a

transitional period during which all existing VSP services up to 10 January 2024 will continue to be regulated under the VSP regime which continues to apply in full for those services. During this period they will be exempt from most Online Safety Act duties. The transitional period will end when the VSP regime is repealed in full. The date for this will be set out in regulations made by the Secretary of State.

- 3.20 The Act requires the Secretary of State to give platforms at least six months' notice of the repeal date. The Secretary of State will also set out in secondary legislation the timing for when VSP providers will need to conduct risk assessments and child access assessments – they will be given at least three months to do each of these assessments, the same as other regulated services. Ofcom will support VSP providers in moving to the online safety regime; more information about this can be found in our [update on repeal of VSP regulation](#).

## Making Sense of Media (MSOM)

- 3.21 **Ofcom's Making Sense of Media (MSOM) programme was supported by a number of respondents. CCNI stressed the importance of improving consumer knowledge about online safety tools and are keen for Ofcom to work with other regulators where remits intersect. Citizens Advice Scotland highlighted the need for increased investment in digital literacy as more essential services become digital. Consumer Scotland urged Ofcom to continue its work on both digital literacy and digital exclusion.**
- 3.22 We welcome the support for our media literacy work, which has a dual focus on people and platforms, as detailed in our [Annual Plan](#). We have commissioned pilot programmes to address the media literacy needs of specific communities in 13 areas across the UK, all of which are operating in areas of financial deprivation.
- 3.23 We have also developed a place-based model of media literacy, where local experts build on the existing offer in their community and embed media literacy into local digital strategies and/or digital inclusion offers. Some early examples from local pilot project include:
- Inclusion of media literacy in Glasgow City Council's Digital Strategy;
  - Expansion of digital inclusion programmes in Rhondda Cynon Taff to include media literacy skills;
  - Connection between media literacy and other city-wide aims in Birmingham.
- 3.24 The Online Safety Act has also given Ofcom new media literacy duties. We will publish our draft three-year media literacy strategy in spring 2024 for consultation.

## 4. Enabling wireless services in the wider economy

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### Spectrum release and spectrum fees

- 4.1 **Cellnex was supportive of Ofcom’s plans to release 1.4 GHz and 26 GHz spectrum. Cellnex also encouraged Ofcom to consider whether the economic benefit of fees from one-off and ongoing spectrum charges would be greater if they were instead used to deploy networks and achieve economic multiplier impact.**
- 4.2 We published a [Review of Ofcom’s market-based approach to mobile spectrum management](#) in January 2024, in response to Government Wireless Infrastructure strategy. As part of our review, we have examined the four main approaches to allocating and charging for mobile spectrum that are used, or have been used, in the UK and in other comparable countries.
- 4.3 This work reviewed our approach to managing mobile spectrum and it is now complete. Mobile operators can submit evidence and request a review, if they consider there is a case for revising the fees. If we believe there is sufficient evidence that there is a material misalignment between ALFs and the underlying market value, we can take a decision to review.

### Upper 6 GHz band

- 4.4 **The Dynamic Spectrum Alliance was supportive of Ofcom’s work on this priority outcome overall but raised one concern, urging Ofcom to not overlook the 6 GHz band’s near-term prospects and ability to contribute to the UK’s digital connectivity targets. Cellnex also encouraged Ofcom to release spectrum in the upper 6 GHz bands.**
- 4.5 **A multi-company response from Apple, Broadcom, Cisco, HP and Meta covered several areas with regards to use of spectrum, most notably in relation to upper 6 GHz. The response stated that Ofcom has the opportunity to take a leadership role in Europe by moving at pace to develop a hybrid sharing framework and to allow licence-exempt use of the upper 6 GHz band as a priority in its Plan of Work for 2024/25. The response also commended our commitment to innovative spectrum management and to lead on the international stage.**
- 4.6 We welcome the positive engagement from industry on this topic and agree we should continue to prioritise our work programme to enable hybrid use of the upper 6 GHz band by Wi-Fi and mobile technologies. We will continue to take a leading role in international studies and discussions supporting the development of technical solutions to enable a hybrid sharing approach to the band.
- 4.7 **BT asked that Ofcom should keep an open mind on the best use of 6 GHz, given the uncertainties about the technical feasibility of hybrid sharing between mobile and Wi-Fi.**
- 4.8 Whilst we are committed to exploring a hybrid sharing approach to the band, any specific policy proposals we develop will be subject to an Impact Assessment that will take into account issues highlighted in responses, including alternative ways to authorise upper 6 GHz.



- 4.9 **The Global Satellite Operators Association (GSOA) emphasised that the work on the upper 6 GHz band will need to take into account coexistence with existing satellite services.**
- 4.10 We recognise the importance of ensuring coexistence between existing satellite services and any new entrants in the upper 6 GHz under a hybrid sharing regime. We successfully argued for limits on mobile emissions that would adequately protect satellite services in the band at WRC-23 and these limits are now incorporated into the International Radio Regulations.

## Spectrum management

- 4.11 **Cellnex encouraged Ofcom to improve spectrum management operational capabilities to support users and customers that Cellnex supports through its shared infrastructure.**
- 4.12 **LoRa Alliance urged Ofcom to sustain its commitment to prioritising and safeguarding SRD bands to fuel growth and innovation within the wireless LPWAN IoT ecosystem. It advocated for a balanced approach that considers the diverse needs of stakeholders, emphasizing the importance of protecting the existing 25 mW limit to support the coexistence of multiple devices and applications within the 915 MHz band for multiple applications that are battery operated that rely on low transmit power.**
- 4.13 Ofcom fully supports work that could permit greater utilisation and flexibility of the radio spectrum whilst applying technical conditions to ensure manageable interference between users of the shared spectrum. We continue to work with other administrations in CEPT to carry out technical studies that may lead to more efficient use of the spectrum, including in the 915 MHz band.
- 4.14 **The British Entertainment Industry Radio Group (BEIRG) highlighted the negative impacts of the reduction on PMSE spectrum allocations and the importance of PMSE equipment in content creation. It urged Ofcom to address possible future challenges that may affect the sector in advance and continue engaging with the sector. Shure UK acknowledges Ofcom's support for PMSE and its ongoing engagement with the sector, but also flag that innovation alone will not be able to mitigate further reduction in PMSE's access to suitable spectrum. It urged continued advocacy for the retention of access to the 470 – 694 MHz band, in the UK and internationally, to protect the economies of scale that PMSE equipment manufacturers require.**
- 4.15 Ofcom recognises the significant benefits delivered by the content creation sector to UK business and consumers. We plan and license the spectrum used by the PMSE sector for programme making and events and we continue to monitor and assess future spectrum demand. We will also continue to engage with the sector, including with BEIRG, so that we can remain across all relevant equipment technology developments and can continue to understand the likely future spectrum needs of PMSE.
- 4.16 **BT suggested that our consultation on award of 1.4 GHz SDL spectrum scheduled for Q1 of FY24-25 is premature and should be delayed until Q4. BT also believe that Ofcom should provide for a review for Annual Licence Fees (ALFs) for spectrum in the 1800MHz band in its plan of work. Cellnex was keen to understand any action we envisage taking after completing the review in 2023 of our market-based approach to mobile spectrum management.**

- 4.17 We have considered BT's suggestion on the timing of our consultation on the award of 1.4 GHz SDL spectrum. We think it is appropriate that we maintain our plan to consult on this matter in Q1 to help secure timely use of this spectrum, bearing in mind that an award would take several months to put into effect following consultation.
- 4.18 We considered ALFs as part of the review we carried out in 2023, in response to a request from Government, of our market-based approach to mobile spectrum management. We published this review in January 2024. Mobile operators can submit evidence and request a review of the ALFs they pay, if they consider there is a case for revising them. If we believe there is sufficient evidence that there is a material misalignment between ALFs and the underlying market value, we can take a decision to review.

## Utility sector

- 4.19 **Cellnex proposed that further work needs to be done to allocate spectrum to the utilities sector and would like to see a timeline and process for release of spectrum.**
- 4.20 We continue to work closely with the UK Government to support its net zero goals with an operational communications system that is fit for the future needs of the smart grid. The Government is looking at the cost of all options to ensure value for money for energy consumers. As noted in our [November 2023 update](#), should the Government determine a private utilities network is required, our next steps would be to develop specific spectrum proposals. In the interim, we are continuing work to confirm the suitability of potential candidate bands for utilities. Should the Government determine a private utilities network is required, our next steps would be to develop specific spectrum proposals. In the interim, we are continuing work to confirm the suitability of potential candidate bands for utilities.

## Emergency services

- 4.21 **Scottish Government is keen to engage with Ofcom around improving network security and resilience to support emergency services.**
- 4.22 We are [consulting](#) on significantly revised network and service resilience guidance for communications providers. It reflects the increased societal dependence on public electronic communications networks and services. The proposed revised resilience guidance contains technical and operational guidance in relation to network architecture, service design, and the operational processes involved in running and maintaining communications networks and services. This guidance is intended to cover communications networks and services from both large and small providers, wireline and wireless technologies, with consumers and business customers.
- 4.23 This includes our expectations on building services to minimise dependence on the internet and reduce attack vectors for critical services which could impact services.
- 4.24 This consultation also includes a separate call for input on power backup for mobile radio access networks (RAN).
- 4.25 The consultation and call for input closed on 1 March 2024. We intend to publish our statement with the updated resilience guidance, and next steps on mobile RAN power resilience, in summer 2024.

- 4.26 **Cellnex considered that releasing spectrum for Police Service Northern Ireland is important to enable deployment of the next generation of public protection and disaster relief services.**
- 4.27 We recognised the importance of enabling the deployment of the next generation of public protection and disaster relief service in our consultation on Spectrum for the Police Service of Northern Ireland. We will continue to engage with PSNI and the utilities sector in Northern Ireland to determine a way forward, given that both sectors are interested in access to the same spectrum.

## Satellite

- 4.28 **A relatively high number of responses looked at our spectrum work in relation to the Satellite industry. GSOA welcomed Ofcom’s recognition of the need to look at the role of satellite in providing direct to device services. Lacuna and the LoRa Alliance urged Ofcom to support work relating to ‘SRD satellite’ solutions.**
- 4.29 As we said in our Plan of Work 2024/25 consultation, we will continue to engage internationally to develop regulations. Given the breadth of agenda items for WRC-27 related to satellite services, we will prioritise our efforts in order to focus on services that will bring the most benefit to people and businesses in the UK.
- 4.30 We will continue our work to ensure our spectrum authorisation is fit for purpose for direct to device services. The call for input (CFI) that we plan to publish in Q1 will gather evidence on future demand for direct to device and other narrow band services and the associated spectrum requirements and will inform how we engage with the relevant ITU agenda items.
- 4.31 **A number of respondents made comments on satellite access to specific bands. Rivada considered it important to reiterate the request to include the option to make the 28 GHz band available for user communications with satellite systems and said it expects Ofcom to evaluate and subsequently enable the coexistence of gateways and user terminals in the 28 GHz band. GSOA highlighted the need to protect satellite services from harmful interference in the 26 GHz and 40 GHz bands when mobile terrestrial mobile services are authorised and also urged Ofcom to enable ESIM access to a wider range of frequencies following international agreements. Eutelsat also made points on the mmWave, Ku band and Q/V bands.**
- 4.32 In August 2023, we published a [consultation on satellite gateways](#) in the spectrum returned by Arqiva in the 28GHz band and we have recently published a statement and wider consultation on the 28 GHz band and a call for input on making additional spectrum available for satellite gateway use in Q/V and E bands. In our [Space Spectrum Strategy](#), we said we would bring forward proposals to broaden the frequencies available for aero and maritime Earth Stations in Motion (ESIMS) once WRC-23 had concluded.
- 4.33 We will continue our work to make more spectrum available for satellite gateways to support faster satellite broadband services for UK businesses and consumers. In relation to GSOA’s concern about the risk of harmful interference in the 26 GHz and 40 GHz bands, we note that our [September 2023 statement](#) sets out the measures that we have decided to adopt for coordinating spectrum use in those bands.

- 4.34 **Eutelsat recommend that Ofcom wait until CEPT’s current harmonisation work with respect to the 3.8-4.2 GHz band has been completed and finalised before introducing any new technical criteria. The GSOA also raised points relating to the continued importance of the 3.8 - 4.2 GHz band for satellite.**
- 4.35 We are considering the points raised by Eutelsat alongside other responses to our consultation proposals on Shared Access, whilst continuing to engage in discussions at CEPT. We expect to set out final policy proposals in the coming months.

## 5. Postal services

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- 5.1 Various stakeholders provided responses relevant to our postal regulation duties, including: the Consumer Council for Northern Ireland, Consumer Scotland, Evri, Mail Competition Forum, Ofcom's Advisory Committee Northern Ireland, Royal Mail, the Scottish Government and Whistl.

### Future of the Universal Service Obligation

- 5.2 Several points were made in relation to the postal USO. The Mail Competition Forum (MCF) welcomed the opportunity to add to the debate on potential USO reform with knock-on consequences for non-USO traffic. It believes that the USO is no longer fit for purpose. Evri asked that Ofcom ensures any changes to the USO do not impact upon competition in the postal sector, specifically the parcels market. For the 2024/25 workplan, Whistl suggested Ofcom commission some structured, quantitative user needs research in the Bulk Mail sector.
- 5.3 Royal Mail stated that it is critical that Ofcom's Plan of Work provides more transparency and a clearer plan of action on the future development of the postal USO project. It also stated its intention to continue to work collaboratively with Ofcom and its stakeholders to provide an affordable, reliable, and sustainable postal service that meets customer needs.
- 5.4 Ofcom's Advisory Committee for Northern Ireland (ACNI) continues to take a close interest in Ofcom's work on the universal postal service, noting some particular consumer and market circumstances in NI which underscore the importance of reliable and affordable services under the USO. The Consumer Council for Northern Ireland (CCNI) said its research showed that any potential reduction in the frequency of deliveries "would feel like a backward step rather than an evolution to meet consumers' needs". It stated that older people in Northern Ireland also equally felt the same way and strongly believe in uniform pricing for the people of NI.
- 5.5 The Scottish Government said the recent call for input on a range of options for redesigning the universal postal service raises significant concerns, noting that it has consistently said that the USO must be maintained. Its response highlighted the challenges of receiving mail in a timely manner, at a reasonable cost, especially considering communities and businesses in rural and remote areas, and the ageing population in Scotland.
- 5.6 As set out in our [call for input on the future of the USO](#), the evidence we have collected suggests the universal service with respect to letters (not parcels) needs to change to better align with the needs of consumers and to ensure it can continue to be affordable and sustainable in the future. We have also estimated that the net cost of the USO to Royal Mail was £325-£675m in 2021/22 and the evidence suggests this level of net cost is not sustainable in the longer-term.
- 5.7 For parcels, our call for input sets out evidence that the USO is meeting current user needs. We recognise there is intense competition in the parcels market and have not, at this stage, put forward any options for changes to the parcels USO.

- 5.8 We welcome input from all interested parties on our assessment, which recognises that postal services remain important and valued to many users, including those in the nations. At this stage we are not consulting on specific proposals to change the USO but instead are opening up a public debate and inviting views on a range of potential options to help modernise the service for the future. These options we have set out include changes to the speed of letter delivery and a reduction in the minimum number of delivery days for letters – these options all rely on the core principles of the USO (universality, affordability and uniform pricing) being maintained.
- 5.9 We held stakeholder events in each UK Nation during February and March to discuss the evidence and options and our call for input closes on 3 April 2024. We are also expecting Royal Mail to put forward its own proposals for the future of the USO as part of this process. Following this, we will carefully consider all stakeholder input, assess the options and provide an update in the summer. Some of the options require legislative change; others could be made through changes to our regulations and therefore it is not possible at this stage to be precise about what the next steps will be.
- 5.10 We recognise the importance of understanding the needs of bulk mail users and we encourage these users to engage with our call for input. As part of considering our next steps we will review whether additional research on user needs in the bulk mail sector would be beneficial.

## Quality of service (QoS)

- 5.11 **Several respondents, including Consumer Scotland and MCF, raised concerns about Royal Mail's recent poor QoS performance, suggesting that Ofcom open up a review and, if appropriate, consider modification to the regulatory regime around QoS.**
- 5.12 **MCF said price increases and poor QoS are impacting the volume of mail, while Consumer Scotland highlighted the negative impact of Royal Mail failing to meet its Quality of Service targets over the last few years. The Consumer Council for Northern Ireland (CCNI) welcomed our decision to fine Royal mail for poor quality of service.**
- 5.13 We recognise the ongoing issues with Royal Mail's QoS performance and the significant negative impact this is having on mail users, with delays being experienced across the UK. In November 2023, we fined Royal Mail £5.6m for its failure to meet a number of its QoS performance targets for 2022/23. We made clear in our findings that we expect Royal Mail to improve its reliability and resolve any operational issues that contributed to its failure to meet its delivery targets in 2022/23. As noted in our recent post monitoring report, we are very concerned about Royal Mail's continued under-performance. We will continue to hold Royal Mail to account for these issues, taking further enforcement action this year, if appropriate.
- 5.14 As set out in our call for input on the future of the USO, if changes are made to the specification of the USO, we may also need to review our QoS framework to ensure that Royal Mail is sufficiently incentivised to deliver a high-quality and reliable service. We made clear that downgrading delivery targets is not an option for reform and any changes to the USO must improve existing levels of reliability.

## Parcel market

- 5.15 **On the parcels market, Citizens Advice encouraged Ofcom to do more work on sustainability in the parcels market. Consumer Council for Northern Ireland (CCNI) noted Ofcom’s monitoring work will be particularly important in 2024/25 as new parcel arrangements under the Windsor framework are implemented from September 2024 onwards.**
- 5.16 **Evri encouraged Ofcom to reconsider the VAT exemption of parcels and consider whether this is still appropriate in a competitive parcels market, stating that VAT exemption gives Royal Mail competitive advantage over other providers.**
- 5.17 While Ofcom does not have a duty to consider environmental sustainability in connection with the postal sector, we recognise its importance to postal users and the operators meeting their delivery requirements. Our market research includes consumer and SME consideration of environmental factors when choosing postal services and operators. In our recent call for input on the future of the USO, we highlighted the impact that changes in speed and delivery days may have on greenhouse gas (GHG) emissions.
- 5.18 We recognise parcel operators, including Royal Mail and the Post Office, are adapting operations and their customer facing systems to meet the requirements under the Windsor framework, including information sharing obligations. The new requirements take effect from 1 October 2024 and we will continue to monitor the provision of the universal service throughout this transition.
- 5.19 The services Royal Mail is required to provide as universal service provider, including parcel services, are VAT-exempt under the Value Added Tax Act 1999. Any changes to this would be a matter for Government. In our call for input on the future of the USO, we set out that the current parcels USO is meeting user needs and we did not therefore discuss any proposed changes to this.

## Affordability and protecting vulnerable postal users

- 5.20 **CCNI said it was worried about the increase in stamp price affecting vulnerable consumers. CCNI also believes that the existing regulatory price cap mechanism is an essential safeguard for consumers.**
- 5.21 **Citizens Advice recommended that Ofcom specifically includes postal services in its work relating to ‘Supporting vulnerable customers’. It believes that this might allow Ofcom to include postal services in the UK Regulators Network scorecard to bring transparency for postal consumers.**
- 5.22 **Consumer Scotland highlighted the importance of ensuring any changes made are in the best interests of consumers and that any potential negative impact on consumers in Scotland are minimised. The response also encouraged Ofcom to consider users of postal services with no fixed address, noting that there are several groups of consumers and communities who may face adverse outcomes due to a lack of a solution for receiving letters e.g., those experiencing homelessness, fleeing domestic abuse, or those from the Gypsy, Roma and Traveller communities.**
- 5.23 **Scottish Government welcome the work Ofcom is carrying out in the parcel delivery market especially the work around the treatment of disabled consumers.**



- 5.24 As set out in our recent safeguard cap review statement, we have maintained the safeguard cap on Second Class letters to ensure that consumers retain access to affordable postal services. We also noted in our call for input on the future of the USO that the two most important features of postal services for consumers are affordability and reliability. We explained in both these documents that we plan to work with stakeholders to review how our interventions to address any affordability concerns might evolve in future (alongside any potential changes to the USO) to better meet consumers' needs in the future.
- 5.25 We will consider whether additional safeguards are necessary to ensure people's needs are fully met. We also recognise that there are some vulnerable users whose needs may not be being met through the current availability of postal services, including those without safe access to a fixed address. We are seeking views from all stakeholders on how the USO may need to evolve to meet consumer needs and will carefully consider all responses before deciding on next steps.
- 5.26 We will provide an update on our work to monitor the implementation of the new requirement on parcel operators to ensure the fair treatment of disabled customers in our next post monitoring report (which we plan to publish in Q3 2024/25).

## 6. Cross-cutting areas and underpinning work

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### Artificial Intelligence (AI)

- 6.1 **Some stakeholders raised questions around AI and how Ofcom is facing up to the fast-paced development of this sector.**
- 6.2 We support the UK Government's framework for AI regulation as set out in its white paper consultation response. We have published an update on our [strategic approach to AI](#) alongside this Plan of Work, which includes setting out examples of work we have done to identify and explore AI risks and opportunities across our sectors.
- 6.3 Many of the projects set out in our Plan of Work Project Annex will touch on AI, and our AI update provides examples of where this is the case across our remit.

### Research and horizon scanning

- 6.4 **The Ofcom Advisory Committee for Scotland urged Ofcom to commit to regional and national breakdown in whatever research or evidential work it undertakes. Whilst this happens to great effect in certain areas (Connected Nations) it is not always the case. The ability to get to this granular level is key to understanding if/any differences exist across the country and we believe it is particularly important in the new area of online safety. It is critical that both the platforms' transparency reports and Ofcom's own reports provide an analysis of people's online experiences by nation.**
- 6.5 Within Ofcom's research and intelligence work, the vast majority of our research is nationally representative of the UK and its component geographies, designed with robust analysis of the individual UK nations and regions of England in mind. This includes increased sample sizes within the UK nations for all of our regular tracking surveys to allow in-nation analysis for each nation. (Exceptions to this would be research which necessarily targets specific areas of the UK, which in the past has included pilot areas of copper telephony switch off and media mergers in local media providers).
- 6.6 Insight, research and data at UK nation level is published in our flagship reports, including our Media Nations, Online Nation and Adults and Children's Media Literacy publications, and supporting data, including interactive data portals, raw data and summarised data tables of consumer research, some of which are presented in the Communications Market Report publication, provides additional insight at the UK nation and regional England level. Additional research from other areas of Ofcom, including the Connected Nations suite of publications allow interrogation of data collected by Ofcom at the UK nation, local authority, Westminster constituency and devolved constituency level, as well as publishing raw data by postcode unit.

### Monitoring Ofcom's impact

- 6.7 **The response from the Ofcom Scotland Advisory Committee stated that monitoring of all areas of Ofcom's regulation is also important to allow Ofcom to determine whether its approach or intervention is working. We understand that it may be difficult to draw a clear line between cause and effect but some element of measuring/assessment of outcomes would be beneficial to the Plan of Work overall.**

- 6.8 We agree that monitoring the impact of the work we do is an important part of our role. As the Committee stated, it is often difficult to draw a clear line between cause and effects, but we make the effort to do so to varying degrees of sophistication. Our updated impact assessment guidance makes the explicit link between the impact assessment process and future evaluations. We are ensuring that evaluation and monitoring is thought about at the time decisions are being taken, so that we can collect the right information. We are currently committed to performing one or two in-depth ex-post evaluations each year. Two examples from last year include ex-post evaluation of [our mobile switching reforms](#) and on [Auto-Switch](#). We also carry out more general monitoring as part of periodic reports, project work and compliance monitoring.

## Climate change and Adaptation

- 6.9 **An area of increasing significance is climate change resilience (adaptation). The Scottish Government noted it is essential that climate change adaptation strategies are embedded into new infrastructure builds and mitigation measures are implemented at existing high risk infrastructure facilities. The response asked what Ofcom is doing to ensure this.**
- 6.10 Environmental sustainability is an increasingly important issue in the sectors we regulate. In 2023, we helped to convene a telecoms industry working group working with the Digital Connectivity Forum and Accenture, which resulted in many of the biggest providers signing up to a commitment to take action. We are encouraged by similar progress in the broadcasting and postal sectors. Many of our regulated firms have committed to net-zero plans and for the first time we will be summarised this in our Connected Nations report.

## Data requests

- 6.11 **UKCTA asked for clearer and more advance notice of information requests.**
- 6.12 We are aware of stakeholders' views around giving more advanced notice of information requests and we are working to improve our approach to this internally. We have recently carried out a strategic review of the Registry and are in the process of enacting some of the changes and improvements that arose from that. This includes investment in creating a community portal which will provide a one-stop-shop for requests for information and will provide greater visibility for stakeholders on planned requests, as well as streamline our internal processes. We also plan to consult on Ofcom's approach to information gathering this year.

## Ofcom engagement

- 6.13 **The Advisory Committee for Scotland (ACS) urged the Ofcom Scotland Team to consider ways to increase its engagement with stakeholders outside Scotland's central belt as these communities often face unique and compounded communications issues. The ACS suggested Ofcom consider an annual outreach programme to physically meet and hear the lived experiences of these consumers. The ACS noted that "it is likely that one visit to an island community would allow Ofcom to gather feedback on most of the areas that [we] regulate" and that the benefit of this type of approach was particularly evident during the Small Screen: Big Debate work. General points on how Ofcom can improve its visibility with consumers were also included.**

- 6.14 We recognise the benefits of ongoing stakeholder engagement and that having a presence across the UK is of great benefit to our work. With the advances in technology and the increased use of video calls in recent years, it is easier than ever before to maintain contact with rural and remote parts of Scotland. However, we acknowledge that there are strong benefits of witnessing the lived experience of the consumer first-hand.

This year, hosting four dedicated in-person Plan of Work engagement events allowed for valuable engagement with our stakeholders in each nation. We have also introduced annual meetings of the Advisory Committee for Scotland away from the Ofcom office in Edinburgh and we'll look to ensure we visit different locations across Scotland as part of this initiative.

- 6.15 **Citizens Advice Scotland asks for Ofcom to consider analysing the impact of the voluntary guidance issued under the Treating Vulnerable Customers Fairly Guide to establish where providers are successfully implementing policies for vulnerable customers. It also asked Ofcom to continue engagement with consumer bodies that represent vulnerable groups.**
- 6.16 The [Treating Vulnerable Customers Fairly Guide](#) suggests measures providers could adopt to help make sure they treat vulnerable people fairly and give them the help, support and services they need. The guide noted progress made by providers in making sure they treat vulnerable customers fairly, but also recognised there was room to do more. An [update to the guide was published in 2022](#).
- 6.17 Ofcom continues to engage with consumer bodies and those representing vulnerable consumers on a range of topics and we published updated [impact assessment guidance last year](#). This engagement often takes place within specific consultations on policy developments but is also supported through ongoing arrangements including through the Communications Consumer Panel. The Communications Consumer Panel, established by the Communications Act 2003, is a group of independent experts with direct sectoral experience whose role is to ensure the citizen and consumer voice is represented in communications policy development – in particular “people who may be in a more vulnerable position in society”.
- 6.18 In Scotland, we regularly engage with Citizens Advice Scotland (CAS) and Consumer Scotland on a range of consumer policy issues. We are also a member of the Consumer Network for Scotland, and are engaging in work examining the actions required across markets, products and services to minimise the potential detrimental impacts of technology on vulnerable consumers.