

Ofcom Board minutes 17 December 2025

Publication minutes of the three-hundred and thirtieth meeting of the Ofcom Board held on 17 December 2025 at Riverside House, London SE1 9HA and via Microsoft Teams

Present

Michael Grade	Chair
Tamara Ingram	Deputy Chair
Richard Allan	Non-Executive Member
Karen Baxter	Non-Executive Member
Natalie Black	Executive Member and Group Director, Infrastructure & Connectivity
Melanie Dawes	Executive Member and Chief Executive (via Teams)
Angela Dean	Non-Executive Member
Bob Downes	Non-Executive Member
Will Harding	Non-Executive Member
Clive Jones	Non-Executive Member
Ben Verwaayen	Non-Executive Member (via Teams)

In attendance

Martin Ballantyne	General Counsel
Veronica Branton	Corporation Secretary
Sharon Malley	Governance Manager
Jamie Mordue	Governance Manager (via Teams)
Richard Sheath	Independent Audit
Rachael Gardner	Independent Audit
Kate Davies	Group Director Strategy and Research (Item 6)
Melissa Tatton	Group Director Corporate (Item 6)
Paul Schwarz	Head of Risk Management and Insurance (Item 6)
Sarah Murray	Interim Public Policy Director (Item 6)
Camilla Bustani	International Policy Director (Item 6)
Jessica Hill	People, Culture and Workplace Director (Item 7) (via Teams)
Ben Harries	Policy Director (Item 8)
Luisa Affuso	Group Director Economics and Analytics (Item 8)
Lacey Law	Economics Director (Item 8)
Deirdre Gordon	Legal Director (Item 8)
Steve Perry	Technical Advisor (Item 8) (via Teams)

In attendance

James Mackley	Economics Director (Item 8)
Suzanne Cater	Enforcement Director (Item 9)
Ian Strawhorne	Enforcement Director (Item 9)
George Lusty	Enforcement Director (Item 9)
David Willis	Group Director Spectrum (Item 10)

	Action
Item 1: Welcome and declaration of members' interests 1. Clive Jones updated the Board on his interests.	
Item 2: Minutes of the meeting held on 19 November 2025 – 329(25) and matters arising 2. The minutes of the Ofcom Board meeting held on 19 November 2025 were APPROVED as a correct record. 3. A summary of progress against action points was NOTED .	
Item 3: Chair's report 4. The Chair updated the Board on his recent activities. 5. The Board NOTED the report.	
Item 4: Chief Executive's report – Board 116(25) 6. Melanie Dawes presented paper 116(25) on her activities. She said the BBC Charter Review Green Paper had been published and Ofcom's initial thoughts would be circulated to Board members. 7. She had met the Secretary of State for DSIT and discussed mobile pricing, switching and mid-contract price rises. The Board noted that there would be a report in spring on the impact of Ofcom's previous decision on mid-contract price rises and this was likely to demonstrate that the market was working well. There were no current plans for further regulatory interventions in this area and any changes to this would require Board support. International comparisons on mobile pricing and choice were favourable to the UK. 8. The Board discussed Ofcom's relationship with Government stakeholders and recent Government discussions. 9. In online safety, Ofcom's Violence Against Women and Girls strategy and annual progress report had been well received. A major package to support bereaved parents had recently been launched and the team had managed this work, including the involvement of a group of bereaved parents, sensitively and professionally. 10. Natalie Black updated the Board on an altnet based in London with some high profile domestic and commercial users that was in financial difficulties. Ofcom	Corp Sec

was liaising closely with the Government and would seek to ensure vulnerable consumers were protected. 11. The Board discussed the increasing volume of AI-driven content and noted the potential for influencing the outcome of the forthcoming elections. Ofcom's powers on misinformation and disinformation were limited but there may be super-complaints in this area and it would be important they were handled carefully. 12. The Board NOTED the report.	
Item 5: Risk and Audit Committee update 13. Angela Dean updated the Board on the meeting of the Risk and Audit Committee of 26 November 2025. She said the Committee had discussed strategic risks and this would be covered later on the Board agenda. It had discussed an internal audit report on the production of the Connected Nations report, which had received a moderate assurance rating. An update to the Committee on corporate security had outlined the actions being taken to respond to increased external scrutiny of Ofcom and the more sophisticated nature and higher volume of cyber attacks. 14. The Committee had discussed the annual review of data governance and records management and noted that while some progress had been made in this area there was still work to do. There had been an increase in the rate of internal data breaches and there would be a deep dive on this to try to understand the causes. There had also been an increase in the rate of Freedom of Information requests, largely related to online safety duties, and while this was being well managed it did represent a potential resourcing issue for the future. 15. The Committee had noted that the plan for the Annual Report and Accounts aimed for earlier completion than previous years and that progress had been made on the presentation of the quarterly management accounts. 16. The Board NOTED the update.	
Item 6: Strategic risk deep dive: Managing our regulatory environment/trusted regulator – Board 117(25) 17. Kate Davies and Martin Ballantyne presented paper 117(25) on Ofcom's strategic risks of Managing our Regulatory Environment (SR1) and Trusted Regulator (SR2). 18. The strategic risks needed to be refreshed to reflect increased scrutiny of Ofcom and the level of expectations from stakeholders alongside an increasingly prominent international dimension. The risk appetite for SR2 encompassed both ensuring Ofcom did not make avoidable mistakes and also ensuring Ofcom made what it considered to be the right independent decisions on the evidence, notwithstanding external pressure. There was generally a low appetite for errors but a higher appetite for making the right decisions even if that meant resisting external pressure. It was proposed that the SR2 risk appetite might be reduced to reflect these pressures.	

19. The Board noted that it would be helpful to carry out scenario planning as a means of identifying and measuring risks and risk appetites. 20. The Board discussed the proposed changes to the risk appetite for the strategic risks and noted the regulatory environment was now more complicated than when SR1 had been set and there was a higher intrinsic risk that could not be managed down. 21. The Board noted the distinction between being cautious in execution but bold on strategy and it would be helpful if the risks could capture the nuance of this. Having a low risk appetite for decision-making would restrict Ofcom's ability to deliver its functions. Generally, the Board considered that there was no good single rating for either risk, as the appropriate risk appetite in each case could vary depending on the circumstances. 22. The Board APPROVED the moving of SR1 from Minimal to Cautious/Open, including information in the narrative on which approach to take in different circumstances and the leaving of SR2 at Cautious/Open. 23. The Board noted that next steps would involve the review of the current risk ratings and targets for these strategic risks, alongside an assessment of mitigations and controls.	
Item 7: Out of London strategy – Board 118(25) 24. Jessica Hill presented paper 118(25) on the Out of London strategy. She said the target of 30% of total colleague headcount had been almost reached and was currently at 28%, aided by factors including the growth in Ofcom's remit. The target would be maintained at 30% going forward. 25. The Board noted that growth in Manchester and Edinburgh had been helped by the presence of directors in these locations. Colleague survey data showed that colleagues created location-based teams to supplement their work-based teams and this improved their sense of integration into the Ofcom culture. 26. The Board NOTED the paper, including progress against the 2020 objectives and targets and the PMB decision to maintain a target of 30% of total colleague headcount to be based out of London.	
Item 8: Telecoms Access Review 2026-2031 – Board 119(25) 27. Natalie Black presented paper 118(25) the Telecoms Access Review 2026-2031. She said Ofcom was currently halfway through a 10-year strategy and coverage of full fibre had now reached 78% of all residential premises. The basis for the next five years of the strategy was the promotion of sustainable competition. 28. The Board noted the most contentious issues and the competing interests of key stakeholders. It was noted that Ofcom's approach prioritised investment and network competition, while recognising that regulation was just one factor that would determine market outcomes over the next five years.	

29. The Board discussed the potential reactions of stakeholders to the review and noted that the government may receive lobbying from industry in relation to the statement. 30. The Board noted that it was difficult to project ahead for five years and that the market now was very different from how it had been five years ago. It was noted that Ofcom retained flexibility to adapt how some remedies applied over the five-year review period as competition developed, while still providing sufficient certainty to the market. 31. The Board noted that the government was prioritising cost of living issues and while the review was about the wholesale market it would be helpful to be able to show how Ofcom's decisions supported consumers. 32. The Board noted that 22% of residential households did not have access to full fibre and that in some cases such as hard to reach communities in Scotland and Wales other solutions such as satellite could be more appropriate for their connectivity. 33. The Board discussed the need for orderly consolidation among altnets and to ensure altnets were able to compete fairly with Openreach. 34. It was noted that the cost to operators to maintain infrastructure had increased and it would be important for Ofcom to continue to focus on network resilience. 35. The Board NOTED the paper, including the proposed decisions and findings, potential risks and outstanding issues, publication details and process for final approval by Natalie Black, Martin Ballantyne and Luisa Affuso. It was agreed that any material change in approach would require further Board review.	
Item 9: Legal Enforcement team update – Board 120(25) 36. Martin Ballantyne presented paper 119(25) on Ofcom's enforcement work over 2025 and priorities for the coming year. He said enforcement was an important lever to achieve Ofcom's objectives and activity in this area was the subject of considerable external scrutiny by stakeholders. 37. The strategic approach to enforcement had evolved to include targeting individual operators in generally compliant industries and driving systemic industry change in the areas of online safety and network security. Ofcom was seeing direct change resulting from enforcement action, for example the introduction of age verification following enforcement decisions. 38. The Enforcement team took a range of approaches to its work, including collaborating with Supervision colleagues to try to achieve compliance at an early stage. This was yielding positive outcomes. In addition, new tools such as business disruption and assessment notices would be deployed in 2026. 39. The Board noted it would be important to develop a consistent line on the approach to companies who did not pay their fine but did rectify the breach. Options to explore might include a formal suspension of a fine as an incentive for companies to comply and in the case of companies based overseas	

implications for officers who visited the UK. It may also be helpful to develop a policy framework to aid decisions on when to pursue the recovery of fines. 40. The Board NOTED the paper.	
Item 10: Spectrum update, August-November 2025 – Board 121(25) 41. David Willis presented paper 120(25) on activity in the Spectrum Group August to November 2025. He said a significant issue had been the future of the Upper 6 GHz band and that Ofcom’s position was now beginning to move ahead of the rest of Europe. A new consultation on using the band for Wi-Fi immediately and prioritising mobile in 540 MHz of the spectrum in future years would be published in January. 42. The Board discussed the proposals and noted that if they went ahead they would see Wi-Fi availability by the end of 2026. The proposals would be compatible with Europe but may be contentious among mobile stakeholders. There was also some risk that industry would choose not to make product for parts of the band if they considered it to be temporary. 43. Developments in the satellite industry were very promising, with SpaceX innovation leading to lower costs and an expanded service. SpaceX occupied a dominant position so far but Ofcom was engaged with other players who may provide competition. Direct to device satellite was growing quickly and could offer a solution to connectivity in sparse rural areas. The Board noted the importance of seeking to ensure where possible that the UK was not dependent on international entities for satellite services. 44. The Board discussed the need to improve Wi-Fi on trains and the need for clearer accountabilities in order to achieve solutions. Ofcom was considering using its convening ability as part of the Mobile Strategy but this was a difficult area. 45. The Board NOTED the Spectrum Group's progress in delivering against the 2025/26 Plan of Work and the current three-year plan.	
Item 11: Contract expenditure – Board 122(25) 46. The Board discussed a proposal to exercise an option within a contract to extend the contract by two years. The Board noted that it would be helpful to provide per-head ICT expenditure to make it easier to understand trends. 47. The Board APPROVED the increase in provision for spend under the contract. 48. The Board noted that work to refresh the ICT and sourcing strategy had started and would lead to a full re-procurement process for the provision of ICT services.	MT/RH
Item 12: Annual Report – section 128 of the Online Safety Act – Board 123(25) 49. The Board NOTED the report titled “Annual Report 2025 – Notices to deal with terrorism content and/or CSEA content for the year ending 31 December 2025” due to be laid before Parliament on 22 January 2026 and published by Ofcom on 23 January 2026.	

Items 13-16: Standing items 50. The Board NOTED the following information items: • Non-executive member updates – Board 124(25) • Monthly performance update – Board 125(25) • Board work programme – Board 126(25) and publication schedule – Board 127(25) • Minutes of the Advisory Committee for Northern Ireland of 2 October 2025, Communications Consumer Panel/ACOD of 16 October 2025 and Online Information Advisory Committee of 7 November 2025.	
Item 17: Items in the Board reading room 51. The Board noted the Ofcom Risk Appetite Statement and CCP/ACOD quarterly update in the reading room.	
Item 18: Any other business 52. The Chair said that the Scottish Government’s proposed successor for Bob Downes was now with the Secretary of State for consultation. 53. The Chair noted that this would be Bob Downes’ final meeting as an Ofcom Board member and recorded the Board’s sincere thanks to him for his valuable contributions over many years as a member.	
Item 19: Date of the next meeting 54. The next scheduled Board meeting would be held on 4 February 2026. 55. The meeting concluded at 12.15 pm.	

Approved: _____

Chair