

Note of the Ofcom Board held on 17 December 2025

Members were welcomed to the 330th meeting of the Ofcom Board. In addition to Board members, Martin Ballantyne (General Counsel), Veronica Branton (Corporation Secretary), Sharon Malley (Governance Manager) and Jamie Mordue (Governance Manager) attended throughout.

Declaration of members' interests

1. The Board noted a new declaration by Clive Jones.

Minutes of the meeting held on 19 November 2025

2. The minutes of the Ofcom Board meeting held on 19 November 2025 were approved as a correct record and progress against actions was noted.

Chair's report

3. The Chair updated the Board on his activity and the Board noted the report.

Chief Executive's report

4. The Chief Executive updated the Board on her activities, including on Ofcom's recently published consultation on STV's request to change its regional programming commitments, the BBC Charter Review Green Paper and meetings with officials.
5. 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.
6. The Board noted an update on the financial position of an altnet. Ofcom was liaising closely with the Government and would seek to ensure vulnerable consumers were protected.
7. The Board noted the report.

Risk and Audit Committee update

8. 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 and an update on corporate security.
9. 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 issues around internal data management and an increase in the rate of

Freedom of Information requests, and while this was being well managed it did represent a potential resourcing issue for the future.

10. 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.
11. The Board noted the report.

Strategic risk deep dive

12. The Board discussed a paper on Ofcom's strategic risks of Managing our Regulatory Environment (SR1) and Trusted Regulator (SR2).
13. 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 Board noted that it would be helpful to carry out scenario planning as a means of identifying and measuring risks and risk appetites.
14. 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.
15. The Board noted that 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.
16. 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.
17. 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.

Out of London strategy

18. The Board discussed a paper on Ofcom's Out of London strategy. The Board noted that the target of 30% of total colleague headcount being based out of London 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.
19. 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.
20. The Board noted the paper.

Telecoms Access Review 2025-26

21. The Board discussed a paper on the Telecoms Access Review 2026-2031, including the proposed approach to the review, the impact on the market and the likely responses of stakeholders.
22. The Board noted the paper, including the proposed decisions and findings, potential risks and outstanding issues, publication details and process for final approval.

Legal Enforcement team update

23. The Board discussed a paper on Ofcom's enforcement work over 2025 and priorities for the coming year. The Board noted that enforcement was an important lever to achieve Ofcom's objectives and activity in this area was the subject of considerable external scrutiny by stakeholders.
24. It was noted that Ofcom was seeing direct change resulting from enforcement action, for example the introduction of age verification following enforcement decisions. 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.
25. The Board noted the paper.

Spectrum update, August–November 2025

26. The Board discussed a paper on activity in the Spectrum Group August to November 2025. The future of the Upper 6 GHz band and Ofcom's position was discussed. A new consultation on the band would be published in January. The Board discussed the proposals, the possible outcomes and the risks.
27. Developments in the satellite industry were very promising. Direct to device satellite was growing quickly and could offer a solution to connectivity in sparse rural areas.
28. The Board discussed the need to improve Wi-Fi on trains and the need for clearer accountabilities in order to achieve solutions.
29. The Board noted the Spectrum Group's progress in delivering against the 2025/26 Plan of Work and the current three-year plan.

Contract expenditure

30. The Board discussed a proposal to exercise an option within an ICT 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.
31. The Board approved the increase in provision for spend under the Ofcom contract.
32. 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.

Annual Report – section 128 of the Online Safety Act

33. 50. 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.

Standing items

34. The Board noted the following standing items:

- Non-executive member updates
- Monthly performance report
- Board work programme and publications schedule
- 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.

Any other business

35. 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.

Date of the next meeting

36. The next Board meeting would be held on 4 February 2026.