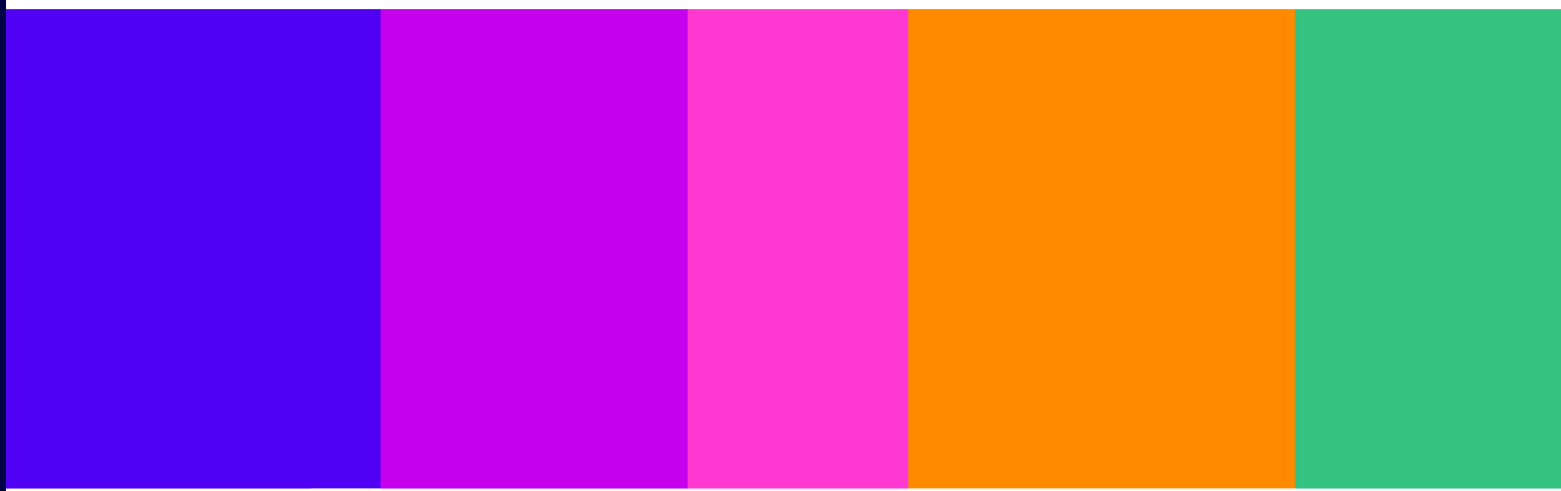


Summary of consultation responses

Plan of Work 2026 / 2027

Published 20 March 2026



Introduction

We consulted on our [proposed Plan of Work 2026/27](#) between 05 December 2025 and 05 February 2026. In total, we received 58 written responses to the consultation. During this time, we also held four consultation events in Belfast, Cardiff, Edinburgh and London, to engage directly with our stakeholders 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 written responses came from a range of regulated stakeholders; including government bodies, consumer organisations, industry bodies and individuals. Where stakeholders have provided permission, we have shared a summary of their response in this document and will publish their feedback on our website. Where stakeholders have requested that their responses remain confidential however, we have not referred to them in this document.

This document provides a **high-level overview** of the main themes emerging from stakeholder responses. It is not exhaustive and does not capture the full detail of individual submissions, and readers should refer to the original responses for the complete versions of stakeholder views. The summaries are grouped into the following areas which reflect the structure of the Plan of Work:

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

As most policy programmes referred to in the Plan of Work are subject to their own consultation process and timelines, our responses refer largely to existing work, ongoing/upcoming consultations and published Ofcom material. In some cases, we have picked up specific points directly with stakeholders.

Summaries

Internet and post we can rely on

Scams and Fraud

Several stakeholders such as Which? and UK Competitive Telecommunications Association (UKCTA) suggest Online Communication Services (OCS) should have equivalent fraud-prevention duties as telecoms providers and that Ofcom should set a timetable for a review of how they are regulated. At the same time, the Comms Council UK, Utility Warehouse, BT and Good Things Foundation raise the pace of progress related to scams and fraud work, with suggestions to accelerate consultations, give timelier regulatory direction, establish permanent engagement mechanisms with Ofcom and make greater use of technical tools, such as traceback. There are calls for industry-led intelligence sharing groups, stronger enforcement and supervision, and digital inclusion by adopting guardrails that build user confidence, shift attitudes, and enable sustained engagement. Infloblox highlight the increasing use of Domain Name System (DNS) in enabling large-scale cybercrime and suggest Protective DNS services could offer wider protection for citizens by blocking access to malicious domains, while the Consumer Council for Northern Ireland (CCNI) and Citizens Advice Scotland (CAS) welcome continued engagement with Ofcom to support scams and fraud work.

Ofcom works to protect users of both number-based mobile messaging and online user-to-user services from criminals seeking to reach potential victims with fraudulent messages and we understand the concerns raised regarding the ability for criminals to migrate between online communications services and telecoms services. While we have different powers and duties in relation to telecoms and online services, in both cases we can require that proportionate protections are applied to protect users. We will continue to build our evidence base to inform work on further action that could be taken.

Ofcom will continue to engage closely with a wide range of stakeholders on our approach to tackling fraudulent calls and mobile messages. We published a [roadmap](#) in 2024 that set out our future work programme, as well as two calls for input on fraudulent mobile messaging and spoofing of UK mobile numbers from abroad. In 2025 we published follow-up consultations on these issues, and we plan to publish our final decisions on them in summer 2026.

We support data-sharing initiatives to combat fraudulent calls and messages and engage closely with industry, Government and law enforcement to help enable data sharing. We want to ensure that regulation supports data sharing that protects people and businesses: for example, in 2025 we published our [proposals on how mobile providers should make use of intelligence on criminals' activities to better protect mobile users](#).

Ofcom continues to meet with signatories to our [Nuisance and Scam Calls \(Technical Measures\) Memorandum of Understanding](#). We're also considering how we may wish to further develop our ongoing engagement with communications providers on how new and existing rules are working. We will also work with industry and Government to help develop traceback processes to identify how criminals' calls are reaching people and businesses in the UK.

Ofcom has powers under the Communications Act 2003 to ensure that telecoms services, such as mobile messaging services, are used efficiently and effectively and are not misused, for example to facilitate fraud or scams. The Online Safety Act (OSA) also requires regulated user-to-user and search services to conduct a risk assessment for illegal harms, which include fraud, and to adopt

proportionate steps to address these harms. Relevant user to user services includes over-the-top messaging services.

Mobile Connectivity

Stakeholders including Good Things Foundation, Cellnex, Citizens Advice Scotland (CAS), AP Wireless, Which? and the Scottish and Welsh Governments support work to improve mobile connectivity and call for more meaningful reporting and data on mobile services. Suggestions include technical metrics beyond consumer-facing tools; independent research on consumer understanding of services; greater data on areas where market provision is limited; and enhancements to Map Your Mobile to reflect real-world performance on reliability, seamlessness, resilience and crowd-sourced experiences.

Good Things Foundation also recommend strengthening Ofcom's work on affordability. The Scottish Government suggest going beyond coverage but into 'useable' coverage, drawing on suggested alternative data sources such as those collected by the Scottish Futures Trust and Glasgow City Council. Alongside this, Cellnex called for greater policy support to improve public outcomes in particular locations such as rail corridors and stations, highlighting the potential for neutral host models to accelerate deployment, reduce costs, and improve consistency across operators, as well as align with investment in Future Railway Mobile Communications System (FRMCS) and passenger connectivity.

Suggestions were also made on market conditions with Cellnex and Federation of Communication Services suggesting Ofcom undertake a review of the wholesale mobile market to ensure that fair access for smaller Communications Providers (CPs), Mobile Service Providers (MSPs) and resellers. They also suggest working with the Department for Science, Innovation and Technology (DSIT) to explore new approaches to Annual Licence Fees. VodafoneThree raised barriers to investment in the mobile ecosystem, including planning restraints and energy costs. They note the absence of an Ofcom report on mobile investment in Q3 2025/26 and suggest reinstating this report and supporting Government in addressing investment barriers.

AP Wireless highlights cases of underutilisation of mobile infrastructure by operators. It recommends an Ofcom formal scrutiny mechanism to identify unjustified site denials and patterns of systemic market failure or exclusionary behaviour.

Finally, a joint response from Amazon, Apple, Broadcom, Cisco Systems, Hewlett Packard Enterprise, Intel Corporations and Meta Platforms suggests seamless, and reliable mobile connectivity should include effective handover between public mobile networks, private 5G, and Wi-Fi networks to help improve high-throughput indoor connectivity.

Ofcom will focus this year on seamless, reliable mobile connectivity for people and businesses on the move, shifting emphasis from headline coverage to the consistency and usability of real-world mobile services. This will be complemented by our work on making the Upper 6 GHz band available for new Wi-Fi and mobile uses.

We will monitor the delivery of improved network quality arising from the VodafoneThree merger and its legally binding Network Commitment. To strengthen competitive incentives, we will help consumers make better informed choices by further developing and promoting our Map Your Mobile tool.

Recognising that market delivery alone will not address all connectivity challenges, we will work to facilitate improvements where barriers persist. We will publish our work programme in Spring 2026 that will focus on four priority areas:

- Urban areas and shared public spaces: supporting local authorities to identify and address capacity constraints and make effective use of local infrastructure. We will develop practical guidance, informed by case studies, to support engagement between councils and industry.
- In building connectivity: working with landlords and estate managers to understand challenges and solutions for improving mobile and Wi Fi connectivity in large, shared public spaces, and to identify where commercial incentives can be better aligned.
- Connectivity on trains: supporting Government initiatives by improving the evidence base through targeted measurement of mobile and Wi Fi performance on key rail routes and considering options for ongoing monitoring.
- Rural connectivity: exploring more radical approaches where commercial incentives are weak, including new models of network sharing. We will develop case studies and work with industry to assess options for addressing persistent gaps. Given our limited direct levers, our role will be to provide suitable data, evidence and practical support to Government, local authorities, landlords and industry, helping to inform decisions and unlock investment that delivers better mobile connectivity outcomes for consumers and the wider economy.

Telecoms Access Review (TAR)

Several stakeholders raise points about broadband services in rural and under-served areas. Good Things Foundation views the March 2026 framework refresh as an opportunity to address the needs of digitally excluded groups and ask for infrastructure design to reflect local geographic and socio-economic realities. The Welsh and Scottish Governments note the importance of the TAR in expanding high-quality broadband access, boosting competition and strengthening resilience. The Welsh Government also called for additional regulatory measures, beyond public funding, including non-fibre solutions.

Concerns about competition are also shared. The Welsh Government and the Independent Networks Cooperative Association (INCA) note the opportunity to review Passive Infrastructure Access pricing in rural areas and highlight that there are pricing imbalances that disadvantage alternative networks to compete and invest. They recommend Ofcom actively monitor and assess broadband competition in newbuilds through its Competition Supervision Programme. BUUK Infrastructure also calls for stronger action on competition in broadband for newbuild housing.

More broadly, stakeholders including Which? and PlatformX Communications (PXC) ask Ofcom to take a clearer medium to longer term view on fixed broadband, addressing the sustainability of full-fibre investment, the role of alternative networks, affordability, take-up, and the consumer impact of provider failure. On network transition, INCA and BUUK Infrastructure (and its wholesale business, Open Fibre Networks Limited) support copper retirement and exchange exit in principle but warn that, without stronger safeguards, Openreach's approach could strand assets and undermine competition.

Internet Services Providers' Association (ISPA) and VodaphoneThree call for a stable, predictable regulatory environment to support investment, alongside better support for industry change management, customer protections in market exit, and regulation that reflects market convergence. Federation of Communications Services (FCS) also notes the growing role of IP-based services and resellers.

We published our [TAR Statement](#) on 17 March. This sets out our approach to promoting investment and network competition in providing broadband services for the next five years. In particular, it puts in place regulation that supports investment by Openreach and alternative networks and provides cost-based access to Openreach's ducts and poles. The regulation in the TAR seeks to promote commercial investment in broadband wherever economically viable and sits alongside public funding schemes in delivering new networks across the UK. The TAR works alongside other Ofcom initiatives to promote the take-up of new higher speed, high quality services – these include

One Touch Switch, End of Contract Notifications and requiring clearer information on broadband services and the technology used to deliver them.

We will monitor progress based on the TAR in our competition supervision programme as outlined below. In addition, as part of the TAR we have considered the potential impact consolidation could have in the future. Ofcom has no formal powers to intervene if a telecoms provider is no longer able to provide services; introducing such an arrangement would be a matter for Government. However, we will continue to monitor the market and work closely with providers and Government where customers may be negatively impacted in the event that network providers struggle financially.

As we set out in more detail in the [TAR Statement](#) (volume 3, section 3), we are supportive of Openreach exiting exchanges to move to a more efficient network, provided this is done in a way that mitigates potential harm to consumers and competition. Exchange exit is a complex operational process that requires significant co-ordination between Openreach and providers, and we consider Openreach and providers are best placed to negotiate a commercial agreement on the terms and practicalities of the exchange exit process. Our existing requirements on no undue discrimination and through 'The Commitments' also help to protect against discriminatory behaviour by Openreach and BT.

The TAR does not consider mobile networks or content and applications providers. Unlike the fixed broadband market, there are three established mobile networks across the UK meaning intervention under the competition framework that underpins the TAR would not be appropriate. Ofcom's regulatory powers do not extend to regulating access to content and applications providers.

Competition Supervision Programme

BUUK Infrastructure and the UKCTA welcome the continuation the Competition Supervision Programme, stressing the importance of supervising Openreach's compliance with the TAR 2026.

UKCTA supports robust monitoring of physical infrastructure access, commercial practices, and copper retirement and exchange exit, given the risks to service continuity, alternative networks, and fair competition. It encourages transparency, timely guidance, and decisive intervention where competition or consumer outcomes are threatened. INCA call for a clear operating model for the Competition Supervision Programme and treatment of copper retirement and exchange exits as competition events. It asks for clarity in terms of how the programme will align with Ofcom's Openreach Monitoring Unit and make suggestions for areas of focus including: development of competition in non-urban locations, new build developments, and BT consumer's exclusive use of Openreach networks. Furthermore, INCA agrees that Ofcom's work on ensuring orderly exchange closures is valuable but warns that Ofcom is not adequately addressing the wider, indirect impacts on alternative networks. INCA urges Ofcom to conduct a full competition impact assessment of exchange closures, introduce safeguards where needed, and ensure Openreach proactively engages with both direct and indirect users.

The Competition Supervision Programme will include monitoring market developments across the markets covered in the TAR and the Call Termination Markets Review. As outlined in the [TAR Statement](#), this supervision will include engagement with industry groups on duct and pole access implementation, as well as monitoring Openreach pricing offers, specifically assessing offers with conditional terms that are required to be notified to Ofcom and considering any requests for consent for geographically targeted pricing. We will also assess Openreach's pricing where we consider, or where industry raises issues to us, that there may be a concern regarding low pricing.

The supervision programme will work closely with the Openreach Monitoring Unit, including where it is necessary for us to consider whether overbuild of alternative networks by Openreach is a cause

for concern, following the approach we set out in the TAR. The programme will also oversee the competition aspects of copper retirement and exchange exit.

Connected Nations

Stakeholders support Ofcom's work on connectivity reporting but call for a more streamlined, strategic approach. Good Things Foundation asks for continued reporting on coverage, usage, take-up and availability, recommending that Indicators of Digital Inclusion (IDIs) be embedded in Connected Nations and, where possible, used by providers in customer-facing settings to identify support needs during service transitions. Cellnex seeks clarity on how enhanced reporting will be used to assess coverage and quality performance, while VodafoneThree supports the review of Connected Nations and Map Your Mobile, offering input on future improvements. AP Wireless calls for greater transparency on rollout and market health, asking Ofcom to develop and consult on a new reporting framework in 2026/27, including indicators such as a national mobile site register, site churn, reliance on temporary infrastructure, and trends in disputed agreements and lease renewals.

We are undertaking a review of Connected Nations to gather views from stakeholders on what information is most valuable to them and to ensure that it remains fit for purpose alongside the range of research Ofcom publishes on issues relating to the communications market. We also plan to work with MNOs to explore how our current coverage reporting approach could evolve as part of enhancements to our Connected Nations reporting. Our research publications for 2026 are detailed in our [statistical release calendar](#).

Migration from legacy services

Many stakeholders note the need to prioritise vulnerable consumers. The Welsh Government emphasises protecting consumers and the need to improve rural 4G/5G coverage as 2G is phased out. The Advisory Committee for Scotland (ACS) and Foundation for Information Policy Research recommends that Ofcom works with stakeholders to develop appropriate safeguards and to introduce the right restrictions to protect consumers. ISPA supports Ofcom's work around identifying and addressing issues with the aim of protecting consumers. It welcomes joined-up engagement between Ofcom, DSIT and providers with a strong focus on outcomes for vulnerable consumers and those reliant on services delivered over analogue lines. It encourages resilience expectations (including during power outages) to remain proportionate and workable across different provider types. Which? encourages a consistent and fair approach to informing and engaging with vulnerable customers, even those not initially responsive while The Comms Council UK seeks clearer commitments on ongoing public awareness, resilience assurance, or cross-sector coordination, potentially through a public campaign. Utility Warehouse welcomes Ofcom leadership in balancing the need for a timely switch off of the Public Switched Telephone Network (PSTN) but also restate the need for migrations to be carried out safely. The Joint Radio Company asks for nationwide availability of BT Openreach replacement solutions. BT calls for clarity on longer term strategy for standalone fixed voice.

Landline phone calls have traditionally been delivered over the PSTN which is part of the legacy copper phone network. In the future, all landline calls will be delivered over a broadband connection using Voice over Internet Protocol (VoIP) technology. This transition is necessary as the existing network is beyond its intended lifespan and is becoming increasingly unreliable.

Ofcom's priority is to ensure that customers, particularly those who are vulnerable, are not subject to unnecessary disruption and are protected from harm during the migration. We are closely monitoring the migration and actively engaging with telecoms providers, consumer groups and DSIT to help ensure that customers are appropriately protected and informed during the transition.

We have been clear with telecoms providers that they must identify, protect and support vulnerable customers, particularly telecare users, during the migration to digital landlines. As we have shown through our recent enforcement action against Virgin Media, we will take action if providers fail to appropriately protect telecare users.

The switch-off of the 2G mobile network will support the roll-out of the 4G and 5G networks which will offer faster and more reliable services for customers. We have set clear expectations for how Mobile Network Operators (MNOs) should approach this, and MNOs have committed to ensuring that they offer a broadly equivalent level of coverage after switch-off. We expect MNOs to undertake detailed coverage analysis ahead of switching off their networks to ensure they meet these commitments and customers do not experience a reduction in coverage.

Shared Rural Network

AP Wireless suggests that Ofcom use its work around Shared Rural Network compliance to examine delivery incentives and infrastructure use to ensure delivery is actually occurring.

The Shared Rural Network programme is delivered by the MNOs, with funding and programme oversight provided by the UK Government. Ofcom's role is to assess compliance with the outcomes which the MNOs have committed to in their licences, which includes an obligation to provide coverage to 89.2% of the UK's landmass, and further commitments for each UK nation. While Ofcom's compliance assessment will focus on delivery of these headline outcomes (rather than how they have been delivered) the obligation also includes commitments to provide a reliable service, and for this service to be provided on an ongoing basis for several years. Were an MNO not to meet its obligations, it may seek to claim a 'proportionate reduction' in certain duly justified cases (for instances where there has been irresolvable planning challenges). In such cases Ofcom will carefully consider evidence provided on any such challenges, including reports made by the Shared Rural Network's Independent Assessor.

Consumer Supervision Programme

Which? and Citizens Advice highlight mid-contract price rises, warning that current pounds and pence increases can exceed inflation and disproportionately affect vulnerable and low-income households. Which? calls for a ban on discretionary in-contract price rises and asks Ofcom to resume quarterly reporting on social tariff uptake, while Citizens Advice highlights the lack of tiered price rises in broadband and calls for robust investigation through Ofcom's review.

Good Things Foundation points to wider data poverty, recommending a combination of interventions including social tariffs, free SIMs, public Wi-Fi and zero-rating. It suggests exploration of a Connected Homes Discount scheme and a space for controlled trials for basic broadband provision. ISPA supports Ofcom's consumer supervision and notes that any changes must be data-driven, proportionate and practical, alongside continued collaboration to improve awareness and uptake of affordable connectivity. Which? raise gaps in focus on customer service, calling for direct collection of complaints data, while the Trust Alliance Group highlights inconsistent Alternative Dispute Resolution outcomes and gives support for a single ombudsman model. Utility Warehouse and UKCTA highlight the Automatic Compensation scheme, citing static Openreach payments and rising provider costs, and UKCTA calls for Ofcom to extend supervision beyond the largest providers.

We want customers to have certainty about their monthly bills so they can plan their household budgets. That is why we banned unpredictable price rises linked to inflation

and instead required providers to tell customers upfront in pounds and pence about any increases in their contract. Following [O2's decision last year](#) to increase mid-contract price rises beyond what customers agreed when they signed up, we wrote to all mobile companies to remind them of their obligations to treat customers fairly and encouraged any customers who wanted to avoid unexpected price increases to exercise their right to exit their contract without penalty.

We also welcome the [Government's Telecoms Consumer Charter](#), and the voluntary commitments which the UK's largest fixed and mobile communications providers have signed up to. These commitments build on our existing protections and include a commitment that where a customer's contract contains a mid-contract price increase, the price they sign up to is the price they will pay

Our recent [Pricing Trends Report](#) highlighted that overall, the prices for most broadband and mobile services are falling. A wide range of choice is available to people looking to buy communications services, and customers who are out-of-contract can usually pay less by switching provider or re-contracting with their current one. The report noted that most providers have introduced flat-rate in-contract price rises following the introduction of our rules. However, as the rules are recent, there is not yet sufficient evidence to draw firm conclusions about the impact of the tariffs introduced by providers to comply with the new rules on overall bills or customer engagement. We will publish a full assessment of the impact of the new rules in 2027.

[Social tariffs/affordability](#)

We will continue to monitor the availability, awareness and take-up of social tariffs, including through our biannual [Communications Affordability Tracker](#), and to report on these in our [Pricing Trends reports](#). We will continue to work with the UK Government and providers in this area and welcome the recent commitments the major providers made in relation to social tariffs in the [Telecoms Consumer Charter](#).

We took the decision to reduce the frequency of the [Communications Affordability Tracker](#) from quarterly to biannually in light of evidence that there have been relatively few significant movements in the communications affordability metrics between waves for an extended period. We believe that collecting data every six months will continue to provide users of these statistics with sufficient evidence to monitor the actions that consumers take to afford communications services.

[Alternative Dispute Resolution](#)

We agree that it is important consumers have easy access to Alternative Dispute Resolution (ADR). There have been two ADR schemes for telecoms since 2003. We keep our approval of the ADR schemes under regular review, which helps ensure consumers are not disadvantaged by their communications provider being a member of one scheme over another. Our [recent review of ADR in the telecoms sector](#) found that both ADR schemes are generally working well for consumers and that consumers are receiving fair and consistent outcomes. We are also introducing new rules on 8 April 2026 which will reduce the timeframe before consumers can access ADR from eight to six weeks, ensuring consumers get prompt access to ADR. We will check provider compliance with these new rules after they have come into effect, to check that they have been implemented.

[Automatic compensation scheme](#)

We recognise this issue that has been raised regarding payments by Openreach not rising in line with automatic compensation payments made to end customers. In the first instance providers should seek to open negotiations with Openreach and may wish to use the OTA2 to do this. We'd expect Openreach to approach any negotiations in line with existing principles and criteria for negotiating Service Level Guarantees which is set out in our [TAR Statement](#).

Small providers

Our enhanced supervisory approach will allow us to take a more forward-looking approach: increasing our intelligence and monitoring of the telecoms sector, developing more structured engagement with telecoms providers and other stakeholders, to build our understanding of their conduct and help pre-empt problems. We plan to increase our engagement with smaller providers and their trade bodies to ensure they understand our expectations, are aware of any upcoming changes to our rules and are compliant so that customers are treated fairly by providers of all sizes.

Consumer impact of AI

Stakeholders like Citizens Advice Scotland (CAS) are supportive of Ofcom's work to understand the consumer impact of AI in telecoms, stressing the need for responsible regulation. It emphasises avoiding consumer harm, while the British Standards Institution points to evidence-based frameworks and standards to reduce AI-related risks. BT suggest converting the ask into a targeted, Ofcom-led information-gathering exercise to limit industry burden. VodafoneThree encourage continued collaboration through the DRCF, including a principles-based Code of Practice and highlight 'regulatory sandbox' environments could be used to develop creative and innovative regulation.

Our work on the consumer impact of AI in telecoms will consider how we can support responsible innovation: for example, we will consider whether any aspects of our current rules could prevent telecoms providers from realising opportunities for innovation and greater efficiency, as well as any gaps in protections for consumers. We will also seek to learn from other sectors' experiences of the deployment of AI and from other regulators' approaches.

We published an invitation to contribute on the consumer impact of AI in telecoms in January 2026 and we welcome direct contributions from stakeholders on the consumer impact of AI in telecoms and how we can support responsible innovation. We plan to draw on our discussions with a range of stakeholders to inform a discussion document that we plan to publish in the second half of 2026.

Broadband Universal Service Obligation

Which? called on Ofcom to review the broadband USO and ensure it is fit for purpose.

In December 2024 we reported that the take-up of broadband services with download speeds of at least 30 Mbit/s reached 75%. This meets a statutory threshold for the UK Government to ask us to review specific aspects of the broadband USO. We will continue to monitor the delivery of the broadband USO by the designated providers (BT and KCOM) and engage with the UK Government on the future approach to the USO, including undertaking a review if directed to do so.

Emergency calls

VodafoneThree and the UKCTA suggest emergency call-handling systems are outdated and place burdens on a few telecoms providers. They call for full system redesign to modernise arrangements, broaden funding responsibilities, increase transparency and clarify responsibilities. Both urge Ofcom to work with Government and industry to deliver a future proof solution.

The primary purpose of the UK's emergency call handling system is to receive calls from the public and ensure they are delivered to the appropriate emergency service without delay or error. Ofcom's regulations with regards to this process are technology and architecturally neutral, and industry has, over time, adopted the processes that exist today so as to maximise reliability and cost efficiency. Industry could explore process improvements and as part of this we strongly encourage early engagement with Government and all organisations involved in the end-to-end emergency call routing, handling and answering chain. Changes in one part of the system can have significant implications elsewhere, and coordinated engagement helps ensure safe and effective implementation.

Online Communication Services

VodafoneThree note messaging and calling apps have overtaken traditional telecoms service whilst not facing any of the regulatory obligations imposed on UK telecoms providers, creating an uneven playing field and disadvantaging regulated operators. It highlights that this regulatory imbalance could undermine competition and consumer protection and calls on Ofcom to develop a coherent approach that aligns obligations across platforms.

We published a discussion document in October 2023 on [Personal Online Communications Services \(OCS\)](#) such as messaging and calling apps. This document looked at the competition and consumer protection issues around Personal OCS. Our assessment found that a number of features of popular OCS at the time, such as no monetary charge to consumers and no set contract period, made consumer harms - from factors such as price rises, unexpected bills and difficulty switching - less of an issue than for traditional communications services. As the document explains, we will continue to monitor the market and relevant regulatory developments both internationally and in the UK.

We have also taken account of OCS in the context of our recent [A2P SMS market review](#) and in our 2026 [Call Termination Markets Review](#), including conducting consumer research into their usage. We will continue to monitor OCS markets and will include updated OCS usage data in the 2026 Communications Market Report.

Number portability and One touch switch

Margrathea Telecommunications highlights the implementation process for business providers to align with One Touch Switch style solutions and suggests a porting key to be the best way to deliver consumer benefits. FCS and Comms Council UK call for more regulatory clarity and ownership around the Number Porting process and switching for business consumers, noting supply chain impacts. Comms Council UK further suggests that Ofcom review the existing porting process and its relationship with switching.

We do not consider that further regulatory intervention is required at this stage, as our existing rules already provide a clear framework for providers to deliver effective switching processes. Our [switching rules](#) require providers to maintain simple and efficient switching processes for customers which are led by the gaining provider, and this includes the porting process where relevant. We did not consider it appropriate to require industry to follow a particular process for fixed business switches since we recognise that business and residential customers may have different needs when switching. However, under these rules providers must cooperate in good faith and take all necessary steps within their control to complete switches in accordance with applicable industry agreed processes. We expect all providers to ensure they are fully compliant with these obligations. We also recognise that a number of providers have already contributed to the development of a business switching [process](#) and [guidance](#) published by the Office of Telecommunications Adjudicator.

We have [welcomed](#) the separate industry initiative to develop an express number porting process to support a simpler and quicker switching process for residential customers. We consider it would also be consistent with our rules for providers to take into account the interactions between switching and porting in the implementation of switching processes for business customers. Industry-led improvement remains essential to ensure that business customers can benefit from streamlined and reliable switching arrangements.

Numbering Plan

Margrathea Telecommunications encourages Ofcom to have a Numbering Plan review based on evolving technology and solutions, while the Comms Council UK suggests a simplification of the UK numbering plan that is more modernised, simpler for consumers, and better fit for the future. The FCS was disappointed to see no mention of the Common Telephone Numbering Database.

We recognise the importance of supporting innovation and meeting emerging demands in telephone numbering. We continually assess capacity within the numbering scheme to ensure that existing resources will be able to meet needs in the future, and we will continue to engage with industry to monitor how numbering demands may develop over the coming years.

We continue to hear feedback about the potential effectiveness of a common numbering database in supporting security, resilience and competition, as well as about the potential costs and challenges. The outcomes of our recent CLI and messaging reforms, and the upcoming Home Office Fraud Strategy will provide important context for any future considerations regarding a common numbering database.

Accessible Communications Services and Quality Standards

National Association of Deafened People (NADP) raises concerns about the accessibility and quality of key communications services, including radio, telephone relay services and internet-based communications. It calls for improvements to Relay UK, greater transparency during the PSTN-to-VoIP transition, and the introduction of clear quality standards for technologies such as Automated Speech Recognition used for captioning.

We do not have any current plans to review our rules on telephone services for deafened people. We recently conducted an ex-post review of our 2021 decision to require emergency video relay (999BSL). The review found that 999BSL is working well and that at least two lives are likely to be saved per year as a result of the service.

We are aware that live captions using automatic speech recognition (ASR) are available on number-independent services such as Zoom, Teams and FaceTime. Ofcom does not regulate these services and is unable to set minimum quality standards. Live captions using ASR have also recently become available on some [Android](#) and [iOS](#) devices. Again, we are not able specify minimum quality standards as we do not regulate mobile handsets or these services.

We worked with NADP to prepare an article for their members' magazine *Network* about migration from PSTN to VoIP and would be happy to answer any further questions NADP may have about migration to IP.

Cyber Security and Resilience Bill

ISPA, Twilio, and the UKTA note the importance of ensuring the upcoming Cyber Security and Resilience Bill and updated NIS Regulations are aligned with international and existing UK standards across regulators, avoid duplication, and take a more targeted, risk-based approach to information gathering to reduce administrative burden.

We fully recognise the importance of ensuring coherence across the regulatory landscape and we are working closely with Government and our fellow regulators to support an approach that avoids duplication, reinforces consistency with established frameworks, and embeds a proportionate, risk-based model for information gathering. Our aim is to help deliver a regime that is clear and that unnecessary burden on industry is taken into account.

Telecoms and Digital Infrastructure Security

Cellnex highlights recent power outages as underscoring the need to strengthen telecoms network resilience. It suggests quantitative resilience targets, prioritisation of resilience improvements at high-impact locations (such as transport corridors and major hubs), and consideration of neutral

host solutions to improve resilience cost-effectively. The Welsh Government also supports resilience improvements, including the role of battery back-up for mobile infrastructure in emergencies. VodafoneThree also notes the importance of power grid resilience and power independence at mobile sites. ISPA supports Ofcom's plans to strengthen supervision of network security and resilience while seeking clearer engagement on Ofcom's expanded cybersecurity role and learnings Telecoms Security Act. VodafoneThree suggest refining Ofcom's supervision approach and establishing a feedback loop between Government, Ofcom, and industry to ensure implementation of the revised.

Ofcom published a report [on power resilience](#) in early 2025 and we continue to work with industry, Government and the energy sector on this important matter.

Ofcom's evolving regulatory approach on resilience will involve tailoring the level of engagement across providers. This approach will create opportunities for providers to offer feedback.

We continue to work with Government on its proposed revisions to the [Telecommunications Security Code of Practice](#) and the importance of changes being proportionate.

Affordability and pricing of postal USO services

CCNI supports Ofcom's objective of a better-connected UK, emphasising the need to reflect regional differences to deliver inclusive and accessible communications. CCNI, Consumer Scotland and the Welsh Government welcome Ofcom's review of postal affordability ahead of the Second-Class price cap expiry in March 2027, highlighting the importance of consumer protection and a financially sustainable Universal Service. Royal Mail supports the review and proposed timeline, noting the need for a Q3 decision, and suggests replacing the Second-Class Safeguard Cap with more targeted affordability support. Citizens Advice highlights the impact of USO changes on bulk and access mail, particularly under alternate-weekday delivery, and encourages Ofcom to monitor mitigations to ensure vulnerable customers remain protected.

Our review of post pricing is ongoing. In November 2025 we published a [Call for input setting out our initial thinking](#) and we are currently reviewing responses to that consultation, alongside taking into account responses to the [Plan of Work](#) on this issue. We will be consulting on proposals later in 2026.

Postal supervision programme

CCNI supports Ofcom's continued monitoring of the postal sector, particularly as USO reforms and new delivery models are introduced, and welcomes Ofcom's focus on parcel operator obligations, including complaints handling and accessibility for disabled customers. Citizens Advice notes sustained underperformance against service targets and limited improvement in parcel consumer outcomes despite monitoring, suggesting that stronger regulatory intervention may be needed if reforms do not deliver better results. Royal Mail supports ongoing monitoring and engagement, emphasising that USO reform is necessary to improve service quality and financial sustainability, and proposes a more structured approach, including regular senior-level engagement with Ofcom, follow-up financial analysis, and a shared report to Government outlining next steps.

Our post monitoring programme of work continues to act as an important safeguard within Ofcom's regulatory framework for post and helps us to understand the changing needs of users, market dynamics and the financial sustainability and efficiency of the universal service. This will include new work to monitor and understand the impact of Royal Mail's implementation of the changes to the USO and access services.

We remain concerned that, in recent years, Royal Mail's performance has been below the level required by our regulation and falls significantly short of what consumers expect. We will continue

to monitor Royal Mail's service performance closely and hold the company to account. This includes regular engagement with Royal Mail on what it is doing to turn things around. Royal Mail must implement a credible plan that delivers significant and continuous improvement that customers rightly expect to see and if this does not happen, enforcement action against service failures is likely to continue.

Our monitoring work also tracks the experiences of parcel users, in particular relating to the handling of complaints and the fair treatment of disabled customers following the introduction of new rules in 2023. While we have seen signs of improvement, there are still a significant number of customers experiencing issues. Therefore, we are undertaking an additional assessment of the steps parcel operators are taking to comply with the necessary regulations. Where our assessment indicates that specific parcel operators are not operating in line with our existing requirements, we will consider whether additional regulation or enforcement action is warranted.

We note Royal Mail's proposed approach to further reform of the USO. Our focus is on monitoring Royal Mail's implementation of the reforms put in place in July 2025. We continue to closely monitor the financial sustainability of the USO and will discuss our approach to this work with Royal Mail as part of our ongoing engagement with the company.

Media we trust and value

Community and Analogue Radio - Spectrum, Small-Scale DAB, and Licensing Reform

Across several community broadcasting stakeholders, including licensees like Leicester Digital Partnership, and community radio stations and representative bodies like Better Media, there is a repeated call for modernisation of radio licensing and spectrum management. This includes moving to on-demand licensing for FM, AM and SSDAB, reviewing FM/AM spectrum (including options for new licences in 2026/27), and delivering licensing processes more predictably. Better Media request a clear implementation plan setting out technical criteria, timelines and decision thresholds.

The public value of community radio is highlighted by multiple community stations, with an ask for Ofcom to continue managing analogue licences, to reopen FM licensing where local provision has been lost, and ensure community stations are considered in future regulation of smart speakers and in-car platforms. Community stations, representative bodies and licensees also call for maintained support for restricted-service licences.

Respondents active in Small-Scale DAB, including multiplex operators, highlight practical issues such as coverage limits, field-strength rules affecting dense urban areas, CDSP restrictions on multi-multiplex carriage, the need for clarity on reserved capacity reviews, more flexible technical variations, and the ability to extend coverage into "white space" areas. Better Media give feedback around application of the 40% capacity rule. Respondents including UK Community Radio Network ask Ofcom to avoid wording that implies analogue services are being deprioritised.

Several stakeholders also propose low-power FM pilots, reassessing specific FM spectrum allocations, and gathering better evidence on audience needs, and resilience to inform future policy.

Ofcom published its consultation on radio licensing priorities on 11 February. This set out our proposals for which areas of radio licensing we would prioritise in the short- to medium- term. It includes our proposed approach in relation to more FM community radio licensing, SSDAB improvements and extensions, the SSDAB 40% rule and other licensing areas. We would encourage stakeholders to engage in this consultation to help inform and set Ofcom's radio licensing priorities for the period beyond the planned rollout of the small-scale DAB programme. We will also review

the licensing summary as articulated on page 12 of the consultation to ensure that analogue community radio services are represented.

Community Media, BBC Local Radio and Spectrum Opportunity Costs

Better Media suggest a review of the public value and market impact of BBC Local Radio, noting that Ofcom is well placed to assess implications for plurality and fair access to spectrum if the BBC reduces local output but retains local frequencies. An individual respondent also suggests reviewing local TV to expand community access to licences for arts and social projects as well as proposing Ofcom commissions research into child-led community media as a healthier alternative to social media for young people.

Under the BBC Charter, Ofcom has in place an [Operating Framework for the BBC](#), covering regulation of the BBC's performance, compliance with content standards and impact on competition. This includes the ability to launch a [BBC competition review \(BCR\)](#) if we have concerns about market impacts in relation to BBC services such as local radio; to date we have not identified any competition concerns which would require such review. In addition, if the BBC wanted to make any material changes to its services, including BBC Local Radio, we would launch a [BBC competition assessment](#). We also considered BBC Local Radio as part of our [modernising the Operating Licence](#) process, and we recently consulted on [changes to the BBC's Operating Licence requirements for Local Radio](#). The BBC has six Operating Licence conditions relating to local radio, including related to the minimum amount of original, locally made programming it must provide, and we report on its performance every year in our [Annual Report on the BBC](#). In addition, in November 2024 we published the findings of our [local media review](#) and we provide our view on the BBC's position in the local news sectors on a yearly basis in our Annual Report on the BBC.

Regarding the BBC retaining frequencies, the BBC has not reduced the number of local radio stations it provides. The recent change to the Operating Licence was related to shared programming on BBC Local Radio; we decided to amend the condition so that shared programming cannot count towards the locally made programming quota if broadcast between 6am and 2pm on weekdays, protecting the most valuable listening hours for local audiences. The overall annual quota for locally made programming and the requirement for local news bulletins remain unchanged.

Regarding the expansion of the local TV sector, Ofcom has only recently completed the renewal process for the existing sector, which required legislative amendments from Government. We do not envisage making further policy changes in the local TV sector within the timeframe for this Plan of Work.

Community Media, Competition and Transmission Markets

Better Media says that small and community radio stations often struggle with transmission costs because prices aren't clear, contracts can be restrictive, and big companies have much more power in negotiations. It suggests this can limit real choice in the radio market, even if licensing is technically open to everyone. It wants Ofcom to look more closely at how this market works, for example, by gathering better information or publishing simple, anonymous summaries of prices and contract conditions - using the powers it already has. At the same time, Better Media supports moving to DAB+ on national and regional multiplexes *only when the evidence supports it*. It suggests the shift shouldn't be treated as just a technical upgrade, but should be planned carefully to protect listeners, support media plurality, and to make sure stations aren't disadvantaged during the transition.

As part of our implementation of the Media Act, Ofcom has recently run a [consultation](#) on information requirements for national and local DAB multiplexes. In the consultation we proposed to require national and local digital multiplexes to publish 'rate cards' for the payments to be made

by radio stations seeking carriage on the multiplex. The aim of this proposal is to give radio stations greater transparency around these costs. We are now reviewing the responses and expect to publish our final statement in the summer. Small-scale DAB multiplex operators are already required, under the terms of their licences, to publish their rate cards for carriage in a clear and transparent manner. In addition, all DAB multiplex licences contain a condition which requires that the licensee must “not enter into or maintain any arrangements, or engage in any practice, which is prejudicial to fair and effective competition.” We believe that the question of whether a digital radio programme service broadcasts using DAB+, or continues to use the original DAB standard, should be a matter for the provider of the programme service, in negotiation with the operator of the multiplex that carries the service. However, we note that the use of the more modern and spectrum-efficient DAB+ standard enables multiplex operators to offer listeners a greater choice of radio stations, while there is no evidence to suggest that significant numbers of listeners have seen a reduction of choice by the migration of numerous radio stations (such as Classic FM and Planet Rock) in recent years from DAB to DAB+.

Ofcom Systems, Open Data, and Democratic Participation

Better Media wants Ofcom to set out a clear plan for updating how it handles radio licensing and publishes information, including making its systems easier to use, linking them to reliable external data, and publishing information in simple, open formats that anyone can understand or reuse.

We currently have lists of the licences in issue, along with the names of the companies who operate them and their contact information and publish details of the transmitters each service is licensed to operate and the spectrum they are permitted to use. Where services have commitments which set out the type of content they are expected to broadcast, Ofcom also publishes these documents. Ofcom currently has no plans to update the information published on the Ofcom website in relation to radio licences

Monitoring of BBC Competition Impacts Local Media/News

News Media Association (NMA) champion fair competition in local media markets with suggestions for greater monitoring in 2026/27 of BBC competition impacts, clearer rules on what “public value” means when assessing BBC services, and closer engagement with commercial publishers, NMA and its members. It encourages the BBC to expand partnership with local newsrooms to strengthen media plurality. NMA asks how Ofcom growth duty obligations are being met in the context of the BBC’s local news services expanding.

We published our Review of Local Media in November 2024, which included an assessment of the impact of BBC’s changes on competition within the local news sector. In this, we said that we will monitor the BBC’s position in local news and the impact of any additional changes to the BBC’s local and regional news services. We also committed to providing an update on the BBC’s position in local news sectors on a yearly basis in our Annual Report on the BBC. Our latest Annual Report on the BBC, covering 2024-2025, provides our most recent data on viewing and listening to local news for the BBC and commercial operators.

In our Review of Local Media in November 2024 we also noted that the BBC could look to promote the Local News Partnership (LNP) and the Local Democracy Reporting Service partnership to the whole sector more effectively so a wider range of news outlets, including appropriately vetted non-news organisations, can take full advantage of what is on offer, amplifying the impact of the scheme and in turn reaching more consumers with public interest news.

We also highlighted the opportunity for the BBC to build on the training it currently offers to local providers and explore whether it could reallocate News Hub resource to other parts of the LNP, such as multimedia reporter.

We also noted that, while future funding of the partnership is for the Government and the BBC to discuss in their negotiations for the next BBC Charter, given the pressures currently facing many local media providers if further funding were to be secured before the start of the next Charter period, some of the potential areas for expansion could be brought forward.

We carefully consider all of our statutory duties in carrying out our functions, including our regulation of the BBC's local news services and the impacts of the BBC on the wider market. We consider the growth duty alongside our other duties and other regulatory requirements on the BBC.

Prominence, Visibility and Media Act Implementation

Multiple stakeholders emphasise the importance of minority-language content visibility and accessibility as well as the need for recognition of unique needs of different audiences based in different parts of the UK. The Welsh Government calls for a greater commitment to Wales in implementing the Media Act, asks for deeper engagement with Ofcom, and better protection for smaller Welsh broadcasters, local news, and radio. The Welsh Language Commissioner similarly highlights the opportunity within the Prominence and Accessibility Code to strengthen visibility and accessibility of Welsh-medium services. It suggests Ofcom should encourage broadcasters and digital platforms to increase the presence and visibility of Welsh language content. The Community Media Association supports RSS measures to ensure community stations remain discoverable. The Scottish Government signals strong interest in Ofcom's Media Act work, particularly upcoming regulation for video-on-demand and new codes.

Ofcom is currently consulting on the draft Code of Practice (CoP) and Guidance in relation to the new prominence regulations introduced by the Media Act. This includes proposals for how designated Connected TV providers can comply with requirements to give an appropriate level of prominence to PSB players and their public service content. If S4C and STV's players becomes designated under the regime, they would then be entitled to receive prominence. Under our proposed Code, this would include both the S4C Clic and STV Player apps being immediately visible on app menus on regionalised user interfaces in the relevant nations, or immediately visible for audiences across the UK on platforms which do not change depending on the location of the user. We are engaging with stakeholders through the consultation process and aim to publish the final Code and Guidance later in 2026.

We recognise that local news and information play an important role in society. They can help to deliver important benefits by supporting local democracy and holding councils and other local institutions to account. Ofcom has recently published its statement on local news and information on local analogue radio. These requirements set out in the statement will secure the regular provision of local news and information on local radio stations ensuring listeners can continue to hear local news on their local radio station.

Ofcom will be consulting on the CoP for Media Act Part 6 later this year and welcome input from stakeholders around that.

We remain committed to complying with our Welsh Language standards, including the policy making standards by assessing the potential impacts of our policies on opportunities for people to use the Welsh language, and to not treat the Welsh language any less favourably than the English language, as noted in the Welsh Language (Wales) Measure 2011.

We acknowledge the Scottish Government's interest in the new requirements for video-on-demand services and would welcome the opportunity to engage. We will shortly be launching a full public consultation on drafts of the new standards and accessibility codes that will apply to Tier 1 Services, as selected by the Secretary of State. We are keen to hear the views of both providers who will be subject to the new requirements and from the public at large. The new standards code will build on our first [review of audience protection measures on streaming services](#) that was published in 2025. This was accompanied by new [Ofcom-commissioned research into audience attitudes towards audience protection measures](#) which included participants from across the UK, including Scotland.

Accessibility of Media Services

NADP comments on issues relating to the accessibility of media services for deafened people. It highlights the importance of captioning across platforms and notes their perceived lack of focus by Ofcom on how people with hearing loss will be supported to access communications services on an equitable basis. NADP also raises concerns about the pace of progress in improving the accessibility of video-on-demand services and the impact of changes to Ofcom's best practice guidelines on live subtitling latency, including on news. In addition, it notes that technological developments may enable captioning of radio services and refer to existing trials (BBC Sounds) as examples of potential initiatives they want to be extended and supported.

Ofcom is actively progressing its work to implement the Media Act requirements for access services (including subtitling) on certain on-demand programme services. While the precise timing of formal requirements is dependent on Government [designation](#) of those services which will be in scope, we have been using this period to prepare for effective and timely implementation. We remain committed to promoting equitable access to media services for all disabled people. Recent changes to our best practice guidelines (including on live subtitling) were informed by extensive research and engagement with disabled audiences, ensuring their experiences and priorities are reflected in our approach. Alongside this, we are continuing to engage with technological developments in accessibility, including radio subtitling technology, so that we are well-placed to respond to innovation.

Discoverability of content

The Welsh Government emphasises that Ofcom's work on news and discoverability must account for the growing overlap between broadcasting and online safety and welcomes planned research into how audiences find PSB news and children's content online, stressing that Welsh demographics and Welsh language needs should be fully reflected through nation level analysis. ACS stressed the importance of research into how Scottish audiences access trusted news and children's content online.

We recognise the importance of all UK audiences being able to easily discover PSB news and children's content. Our research agenda will continue to include nation and region-level analysis wherever possible. Where quantitative research cannot sufficiently capture how Welsh or Welsh-language content is discovered online, we will draw on insights from continued engagement with Welsh stakeholders.

Review of Broadcast Regulation

The Welsh Government supported reforms to the media regulatory framework but stressed the ongoing reliance on more traditional broadcasting needed to be considered. It also called for Wales to be recognised as a distinct nation with programming that safeguards Welsh-language and supports content that reflects Welsh history, culture, sport and social issues while ensuring

investment continues to benefit local creative industries. The Welsh Language Commissioner similarly asked how digital and social media can better support Welsh-language use, particularly among young Welsh speakers. GB News called for a clearer definition of public service media, simpler and fairer licensing, equal access to funding, and more consistent regulation across TV and digital platforms.

Following our [November 2025 call for input on the review of regulation](#), we are considering stakeholder responses on their key priorities for reforming regulation. The Government's decision on the future of TV distribution and the timing of any resulting legislation will also be an important input into this work. Once this has been announced, we will publish an update setting out the parts of the regulatory framework we intend to consider within this work, our initial priorities and indicative timelines. As part of this, it will be important to consider the different needs of audience demographics across the nations and regions of the UK, including for Welsh language speakers.

BBC Charter Review

The Welsh Government welcomed working with Ofcom as it supports the BBC Charter Review to ensure needs in Wales are considered.

The Welsh Language Commissioner encourages Ofcom to consider issues relating to Welsh-medium broadcasting when providing input to this discussion.

The Scottish Government notes its interest in the BBC's role in supporting the UK creative economy. It welcomes Ofcom's commitment to monitoring developments in the BBC charter process and implications for BBC Scotland and MG Alba. The Advisory Committee for Scotland also expect Ofcom's role in BBC Charter renewal to protect plurality and ensure those relying on linear TV in Scotland are not disadvantaged.

Ofcom is working with Government to provide input to its BBC Charter Review process. In December 2025, DCMS published its [Green Paper and public consultation for BBC Charter Review](#). As part of this, it has set out how it is considering the BBC's role in supporting the sustainability of minority language broadcasting and has said that the Charter Review will explore the potential for new regulations or bilateral frameworks that could help support minority language broadcasting across the UK. It is also considering the BBC's spend, activities and decision-making across the nations of the regions of the UK. As set out in our draft Plan of Work, Ofcom will support this review and provide input as appropriate over the course of 2026/27.

Assessing trusted media, including BBC Complaints, Due Impartiality, and Public Confidence

Stakeholders raise a range of views on how Ofcom should assess trusted media, handle complaints and ensure fairness across broadcasters. Better Media highlights the BBC's internal complaints system for being unclear to navigate. It recommends Ofcom creates a clear escalation process, setting out when Ofcom can step in and how "due" editorial impartiality is applied in practice. It supports commissioning independent research into public attitudes to impartiality, trust, and responses to globalised misinformation in the UK media environment. GB News also suggests abolishment of BBC First complaints system and that Ofcom should handle complaints about BBC content.

The Scottish Government suggests UK wide public service news continues to misrepresent or overlook devolved responsibilities leading to inaccurate or misleading coverage of Scotland. It suggests that Ofcom must ensure UK network news meets its obligations to reflect the UK's nations accurately and calls for the Plan of Work to reinforce Ofcom's role in protecting the availability, prominence and sustainability of trusted public service content, especially content that provides strong and accurate Scottish representation

Complaints about the BBC's content and programming must normally be made to the BBC first. This 'BBC First' complaints system, set out by Parliament in the [BBC Charter and Agreement](#), was put in place to allow the BBC to stay close to its audiences and their concerns. Audience research shows that licence fee payers continue to have a strong sense of ownership of the BBC; and that the complaints system gives the BBC an opportunity to maintain this direct relationship with its audiences. In Ofcom's view, it is an important tool for the BBC to build and maintain trust with licence-fee payers.

The escalation process for BBC complaints is set out in the [BBC Complaints Framework](#) and also on Ofcom's [website](#). The full BBC complaints process consists of three stages -Stage 1a, 1b and 2. If complainants are unhappy with the response from the BBC at each of stage 1a and 1b, they can ask the BBC to look at it again. Stage 2 is the final stage, where a complainant can complain to the BBC's Executive Complaints Unit (ECU). The ECU is tasked with considering complaints impartially and independently of the interests of the programme makers/content providers.

If complainants remain dissatisfied with the BBC's final decision, they can refer the matter to Ofcom. We monitor all published BBC ECU upheld decisions to decide whether any further regulatory action is necessary regardless of whether we receive an actual complaint on that case. Under the terms of a revised [BBC Framework Agreement](#), we are also due to commence reviewing a representative sample of BBC complaints that have been resolved by the BBC but have not been referred to Ofcom. Ofcom has the power to step in and intervene at an earlier stage to resolve a complaint about BBC content in exceptional circumstances¹, or to launch an investigation in the absence of a complaint if we think it is appropriate to do so.

In line with the BBC Charter and Agreement, which set out the respective roles and responsibilities of the BBC and Ofcom in relation to the governance and regulation of the BBC, Ofcom has a duty to consider the BBC's overall approach to complaints handling. We publish information on our oversight of the BBC's approach in our [annual reports on the BBC](#).

We have carried out two mystery shopping exercises, in [2022](#) and [2024](#), into the BBC First complaints system since becoming the regulator of the BBC for the full Broadcasting Code in 2017, to assess how it is performing for audiences. Following both reviews, we made recommendations to the BBC to improve its process.

The BBC has made a number of improvements as a result of our reviews, such as restructuring its complaints team; implementing a new internal reporting mechanism; conducting its own reviews of its complaints process on an ongoing basis; introducing and updating a complaints video on the BBC Complaints website; and improving the script its call agents use. Ofcom will continue to engage with the BBC to monitor any further changes they make to improve the complaints process.

Ofcom also commissions independent research from time to time into key issues which aid our enforcement of our Broadcasting Code rules. In 2022, we published research into [Drivers of Perceptions of Due Impartiality on the BBC and the Wider News Landscape](#) which showed that the range of factors shaping audience perceptions of due impartiality present the BBC with complex challenges.

¹ These exceptional circumstances include (but are not limited to) Ofcom having potential concerns about material that: is likely to incite crime; may cause financial or physical harm, or harm to minors; or involves under 18s in a programme or series. More guidance on what constitutes "exceptional circumstances" can be found in our [Procedures for investigating breaches of content standards on BBC broadcasting services and BBC on demand programme services \(PDF, 208.0 KB\)](#). Whether Ofcom decides to intervene at an earlier stage in any such complaint will depend on the relevant facts in each case.

Guidance for Broadcasters following Supreme Court ruling on the interpretation of the Equality Act 2010

Better Media suggest Ofcom updates guidance to broadcasters, linked to relevant Broadcasting Code provisions and Ofcom's complaints handling approach, that explain how Ofcom will assess accuracy, due impartiality, and potential harm where sex based rights and gender identity claims intersect, while remaining within Ofcom's regulatory remit and avoiding unnecessary commentary on wider equality law beyond what is required for broadcast regulation.

The recent Supreme Court Judgment ([For Women Scotland Ltd v The Scottish Ministers \[2025\] UKSC 16](#)) is clearly a significant development in the continuing public and political debate over the appropriate political and societal approach to sex and gender-based rights. This judgment sets out the legal approach to sex-based discrimination for the purpose of the Equality Act 2010. In our view, however, the judgment does not provide wider guiding principles for the purposes of Ofcom's assessment of broadcasters' compliance with the Broadcasting Code.

We remain satisfied with our current approach, namely that Ofcom's assessment of any particular programme is, and must always be, fact-sensitive and contingent on the particular circumstances of each particular case, including all relevant contextual factors. These are all intrinsically fluid and fact-sensitive concepts which, as our [Guidance Notes](#) note, are conditioned by both a programme's context and by "social mores and sensitivities [that] change both over time and in response to events". To this end, we carry out a regular programme of audience research to underpin our understanding of generally accepted standards. Our assessments also take into account the broadcaster's and audience's rights to freedom of expression.

Migration of services

Good Things Foundation welcomes Ofcom's continued coordination with industry and Government to support customers through legacy service transitions and notes migrations (e.g. PSTN) are opportunities to embed digital inclusion. It recommends Ofcom investigate a full transition to Internet Protocol Television through a digital inclusion lens. It highlights need to strengthen support for vulnerable customers through existing initiatives, such as the Government-led Charter commitments.

We welcome the Good Things Foundation's interest in the Future of TV Distribution debate. As we said in our [report to Government](#), the migration from DTT to IPTV will most likely need a planned campaign to support people in getting connected and confident. While this will take careful planning, an inclusive transition will have wider benefits for digital inclusion. We are continuing to work closely with Government, providing evidence where possible, ahead of its decision on the future of terrestrial television.

Ensuring all consumers and businesses are supported through legacy service transitions remains a key priority for Ofcom. Last year, we interviewed 70 people from across the UK, including many who face unique forms of digital disadvantage, to deepen our understanding of the barriers to broadband take-up. Our findings are published in our [Barriers to Household Connectivity](#) report. This report will continue to inform our work on media literacy, user empowerment and our [Inclusive Research Programme](#). We are happy to engage further with the Good Things Foundation on inclusive digital transitions.

VOD accessibility and standards

Good Things Foundation supports Ofcom's consultation on VOD accessibility and standards, recommending that accessibility codes embed media literacy and safety-by-design principles. It

suggests incorporating clear, simple language in privacy policies and adopting a consistent, universal approach to cookie controls to help users navigate services more easily and make informed decisions about their personal data.

We will be consulting on a Tier 1 VOD accessibility code once Government has specified which services will be “Tier 1”, and welcome responses to that consultation. The Media Act sets out Ofcom’s role in publishing the accessibility code and does not address data protection and privacy. However, Ofcom’s media literacy duties do require us to support users to engage critically and confidently with digital services. Our forthcoming Media Literacy Statement of Recommendations (draft published for consultation in September 2025) sets out how a broad range of services, including VOD, can embed media literacy by design principles - including clear, accessible information and meaningful user choice - to help people navigate online environments safely and make informed decisions about their data and their use of services.

Enabling wireless services in the UK economy

Releasing additional spectrum

Respondents broadly welcome plans to release additional spectrum, including 1.4 GHz and upper 6 GHz, as an opportunity to improve capacity and connectivity, while noting that release alone is insufficient without clear safeguards and conditions. Cellnex suggests future licences should include deployment or sharing expectations to prevent spectrum being unused, alongside improved access to street furniture and measures such as RF monitoring to support network densification. BT highlights the need for a consumer-focused approach, including protection for vulnerable users and maintenance of coverage.

There is strong interest in the management of upper 6 GHz. A joint response across major technology firms (Amazon, Apple, Broadcom, Cisco Systems, Hewlett Packard Enterprise, Intel Corporations and Meta Platforms) calls for greater clarity and certainty, including a roadmap for automated frequency control introduction and how decisions on 6 GHz will shape UK position at World Radiocommunication Conference 2027. They query implications for device markets and enterprise Wi-Fi. INCA emphasises that spectrum policy should also support fixed wireless access and point-to-point links, particularly in rural areas, with simple licensing and effective sharing arrangements that work for smaller operators. The Scottish Government highlights the role of spectrum policy in supporting economic growth and the future availability of mobile and satellite services.

This year we will enable AFC providers to begin offering service to higher power uses in the 6 GHz band, thereby facilitating services such as FWA and, where appropriate, protecting incumbent use. We will also consult on proposals of how mobile networks will be able to access the Upper 6 GHz band in future and the implications for Wi-Fi and other users of the band. Our approach in the UK will inform our contributions to international fora, our position at WRC-27 and our engagement with standards bodies and equipment manufacturers.

Across our work, we will consider our duty to ensure efficient use of spectrum when developing authorisations and awards and promote innovation and investment in spectrum use.

Spectrum sharing

The Welsh Government welcomes our plans for spectrum sharing to improve rural connectivity and suggests using coverage obligations or financial incentives in future awards to encourage deployment in underserved areas. The Joint Radio Company emphasises the need to protect incumbent services, particularly lower-frequency bands critical to energy network operations. ISPA and UKCTA highlight the importance of supporting innovation, calling for more predictable and flexible access to spectrum, streamlined and modernised licensing processes, and alternative models for large campus-style sites. The FCS supports spectrum sharing but notes risk around non-compliance with licence conditions and expresses interest in discussions on mobile band defragmentation for business radio users. The Dynamic Spectrum Alliance supports Ofcom's approach to 6 GHz, including enabling AFC-based outdoor Wi-Fi and expanded Low Power Indoor and Very Low Power Wi-Fi use.

We will continue to explore options for spectrum sharing to improve utilisation of spectrum and enable innovation and investment, taking into account incumbent users. Through improved operational process and system upgrades, we endeavour to improve our licensing process, improving turn-around times and offering more flexibility in how we authorise and charge for

spectrum access. Through our work on spectrum assurance and compliance, we will act quickly to investigate and address claims of harmful radio interference.

Spectrum below 1 GHz

Cellnex and the Joint Radio Company welcome Ofcom's review of spectrum below 1 GHz, noting its importance for mobile coverage, utilities and rail. They encourage engagement with Government and Ofgem to support smart grid capability, to confirm clearance plans for utility spectrum and improve the resilience and security of telecoms supporting low-carbon energy systems. The Joint Radio Company also highlights need for dedicated spectrum for mission critical operational telecoms—identifying 700MHz as a means for to support COP2030 and Net Zero goals. Cellnex further notes the importance of 1900 MHz for migration from the existing Global System for Mobile Communications - Railway (GSM-R) to FRMCS. It encourages Ofcom to set out clear plans, timescales, and technical parameters for its use.

We are continuing to collaborate with Government on potential telecoms solutions for the utilities sector, and should new spectrum be required to support a private network, we will consider the appropriate options, building on our [2023 Call for Input](#).

We published our [decision authorising use of 1900–1910 MHz for FRMCS in October 2025](#), providing full details of the licences which will be available to support future connectivity for rail infrastructure.

Signal repeaters for bands above 3.4 GHz

Nextivity suggest Ofcom should now consider extending the UK's licence-exempt rules for mobile signal repeaters for relevant bands for TDD-based 5G service such as 3.4- 3.8 GHz.

We will consider the benefits of extending existing rules for mobile signal repeaters as part of our wider work on improving mobile connectivity. We note that benefits of enabling repeaters for the 3.4-3.8 GHz bands would be limited to those, mostly urban, parts of the UK where the mobile operators have deployed these frequencies.

1.4 GHz auction

The Joint Radio Company notes that energy networks use BGAN services in 1.5 GHz and encourages Ofcom to ensure CNI services are suitably protected from interference as it enables deployment in upper part of 1.4 GHz band.

As set out in our [February 2025 consultation](#), our provisional view was that the overall benefits of making the upper 1.4 GHz block available for IMT outweigh the potential impacts on land terminals, including BGANs. We will set out our final decision by the end of Q1 2026/27.

Spectrum for space

The Joint Radio Company acknowledges growing demand for spectrum for space services and asks Ofcom to balance the protection of Energy Network Operators with expanding spectrum access.

The Welsh Government signals support for satellite direct-to-device for addressing connectivity challenges in remote areas and welcomes commitments to flexible access. Several stakeholders including Plan S, Lacuna Space, and the LoRa Alliance voice their support for satellite IoT for delivering essential, low power, ubiquitous connectivity, both complementing terrestrial networks and providing vital backup during outages, making it central to the UK's digital, economic and

resilience goals. These stakeholders ask Ofcom to enable satellite use of the 862–870 MHz band and adopt ECC Decision (25)02, as other European countries have done so.

Fixed links and satellite gateways have historically shared spectrum bands and there are well-established methods to coordinate these services; we utilise these methods in our systems across a range of frequencies. Given the limited number of gateways expected in the UK and the relatively close sharing that can normally be achieved between fixed links and gateways, we anticipate that sharing between fixed links and satellite gateways will continue to be feasible into the future. Indeed, as fixed links and gateways move to higher frequencies, the propagation characteristics should reduce the risk of interference, and we therefore anticipate more opportunities for sharing between these services.

We have published our [approach on Direct to Device Satellite Services](#) and anticipate UK consumers will be able to access D2D in England and Wales from April 2026.

Regarding IOT or Low Power Device – Satellite (LPD-S) services in 862-870MHz, many of the provisions within ECC Decision (25) 02 relate to Space-to-Earth transmissions, which fall outside the scope of our licence exemption regulations. We note that equipment complying with the technical parameters as set out in Interface Requirement 2030 (IR 2030), and adhering to any other restrictions imposed on its use, is already licence exempt under the Regulations. We nevertheless intend to consult later in 2026 on introducing clarifying text into IR2030 relating to LPD-S in the 862-870 MHz band

Spectrum innovation and growth

The Joint Radio Company stresses the importance of protecting incumbent services when spectrum is shared and urge Ofcom to ensure continued access to the key spectrum bands needed for the safe and secure operation of critical energy network telecommunications. ACS supports innovation in spectrum sharing and 6G readiness but cautions that next-generation projects must not overshadow the ongoing need for basic, reliable connectivity in rural / vulnerable communities.

We are continuing to collaborate with Government on potential telecoms solutions for the utilities sector, and should new spectrum be required to support a private network, we will consider the appropriate options, building on our [2023 Call for Input](#).

Our work on improving mobile connectivity will consider both short term and long-term challenges and opportunities.

PMSE

British Entertainment Industry Radio Group (BEIRG) highlights the vital importance to the creative industries of the 470–694 MHz band for audio PMSE. BEIRG urges Ofcom to continue strong international leadership, particularly in ECC and WRC27 processes, to protect PMSE access as countries explore more flexible use of the band.

We are currently running a [Call for Input](#) which seeks to understand the future needs of the PMSE sector and how they might be met given growing demands and potential changes in the spectrum landscape as wireless technologies and applications continue to evolve (closes 15 April 2026). Responses will inform our review of PMSE spectrum use and we will provide a further update on this later in the year.

Online Safety

General commentary on Online Safety regulation

The Welsh Government suggest Ofcom include CSAM and similar types of illegal content under the section titled ‘More effective removal of illegal content.’

Our plans to address the effective removal of illegal content include ensuring that service providers adopt systems and processes to address illegal content covered by our [Illegal Content Judgement Guidance](#). We’ve specifically called out CSAM and grooming in a separate section in our plan recognising the importance of not only removing but also preventing this type of content and activity online.

The Welsh Language Commissioner encourages Ofcom to consider how Welsh speaking users can be protected from illegal and harmful content online.

The Ofcom Wales team continue to engage regularly with Welsh stakeholders and will keep abreast of future research on the use of Welsh on online platforms. Our 2025 [Illegal Harms Codes of Practice](#) and [Protection of Children Code](#) outline the steps that providers can take to protect all UK users from illegal content and content harmful to children on their services. For example, the Illegal Harms Codes of Practice include recommendations that all user-to-user services have systems and processes in place to adequately assess and remove illegal content, while our Protection of Children Code recommends services likely to be accessed by children to implement clear and accessible ways for users to report harmful content and strong measures to detect it.

Scottish Government – Digital Citizens Division, encouraged Ofcom to embed clearer expectations around how platforms mitigate the risks of misinformation, manipulation, or other harmful content.

Following extensive policy work, technical research, and consultation we published Codes and guidance on preventing [illegal harms](#) in December 2024, and on [protecting children and implementing highly effective age assurance](#) in April 2025. Where content amounts to a relevant offence or a category of content harmful to children defined in the OSA, service providers have duties to take appropriate steps to mitigate risks. Misinformation is not named as a harm in the OSA that providers are required to address, but they have duties where it overlaps with these categories. In the future, providers of Category 1 services will also be required to apply their terms of service consistently, including where they have provisions on misinformation, and we expect to publish our draft proposals on this duty in summer 2026. In our section below on media literacy, we set out some of our work to address misinformation. Our consultation on [‘How to Promote Media Literacy’](#) sets out steps that services of all sizes can take to promote media literacy. Our [ten recommendations](#) are designed to help a broad range of services empower the public with the skills and information they need to engage critically and safely with online content, this includes misinformation. We expect to publish our final guidance this Summer.

Skyscanner asks Ofcom to maintain its commitment to proportionality and only impose additional measures where there is clear evidence of harm. It further suggests Ofcom could do more to reduce the regulatory burden on low-risk firms and thus better align with the growth agenda.

We are committed to proportionate and fair regulation and will continue to monitor and evaluate the impact of OSA implementation. We will also continue to review evidence of risk and harms to inform our future policy work. The measures in our [Codes of Practice](#) are designed so that they are tailored in relation to both size and risk, with the more onerous requirements falling upon the largest services with the highest reach, and/or those services that are particularly high risk.

We recognise that we are responsible for regulating a wide range of highly diverse services, both large and small, including those run by businesses, but also charities, community and voluntary groups, individuals. Ofcom is committed to ensuring the new rules are clearly explained to services

to help reduce the administrative burden of regulation faced by services and have developed materials and tools to support industry. For example, we have developed an [Ofcom Regulation Checker for Online Safety](#), which helps businesses assess whether online safety regulations apply to them.

Foundation for Information Policy Research suggests that Ofcom engage beyond industry to understand the real-world impacts of different technical solutions. It recommends clarifying how “safer online” will be measured, focusing regulation on outcomes rather than specific technologies, and assessing potential effects on privacy, security and access to safe tools. It also shares recommendations for more research, independent audits, and stronger horizon-scanning, particularly on age-assurance methods and harms to children.

Our monitoring and evaluation efforts are focused on two core questions: first, what changes are services making to comply with their duties under the OSA; second, are these changes translating into a safer life online for UK users. Answering these questions is essential for the long-term success of the online safety regime, as it will allow us to adapt our strategic priorities and [Codes of Practice](#) based on what works well and where further action is needed. To help us answer these questions, we are combining Ofcom research with data collected from law enforcement, civil society groups, industry and academia. By evaluating material from a range of sources, we will build a clear picture of online harm based on evidence that is comprehensive, timely, and reflective of real-world experiences.

Advisory Committee for Scotland requests the inclusion of Scottish-specific data in the Safer Life Online for Women and Girls 2027 follow-up report. It also asks for updates on plans for an external individual redress mechanism, noting a current gap for users whose complaints platforms do not resolve.

The follow-up report will be informed by evidence and data from a wide range of stakeholders including service providers, civil society organisations, academia, and expert public bodies. We will engage with these stakeholders during a Call for Evidence, which we intend to hold in Q3 2026/27. We also intend to engage with people from across the UK, including Scotland, to understand how their online experience has changed.

The OSA requires Ofcom to produce a report assessing services measures to comply with their reporting and complaints duties within two years of our guidance on Terms of Service for Categorised services being published. 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. It will be for the Secretary of State to determine whether further regulations are required for a means of individual redress, including alternative dispute resolution.

The link between the Government’s Statement of Strategic Priorities for Online Safety and Ofcom’s Plan of Work and Safety by Design

The Online Safety Act Network (OSAN) suggested ‘safety’ should be more prominent in Ofcom’s approach to good regulation.

The OSAN notes there does not appear to be a link between the Government’s Statement of Strategic Priorities for online safety (SSP) and the draft Plan of Work, pointing out that last year’s Plan of Work referred to the draft statement but did not consider that its final plan would need to be amended to reflect the SSP. It highlights the lack of understanding across teams regarding ‘safety by design’ and the requirements set out in the OSA as well as that the response to the SSP also did not suggest priorities like transparency and accountability, mitigating threats from AI-generated content and activity, and making users aware of and resilient to mis- and disinformation were being met. It expresses the concern that the Plan of Work does not suggest Ofcom has thought further about these priorities since the SSP, noting in particular the delays to the transparency duties and lack of

work to fill the gap, the lack of mention of AI-generated content and proposed work to understand and address the risks that may present, and the lack of reference to misinformation or disinformation. It recommends updating the Plan of Work to include safety by design and any new work Ofcom is undertaking to demonstrate its due regard to the SSP on Online Safety. Finally, it recommends the Plan of Work focus more on outcomes.

The Scottish Government – Digital Citizens Division supports taking a broad view of vulnerability and recognising the diverse factors, including disability, age, poverty, literacy levels, or social marginalisation, all of which impact online risks. It welcomes further emphasis on safety-by-design expectations, especially around automated systems or algorithmic tools.

Our Plan of Work should be read in the broader context of the overview which explains our need to navigate an evolving environment whilst promoting the interests of, and good outcomes for, consumers and citizens.

Ofcom has had regard to the Government’s focus areas for online safety as set out in the SSP in developing our online safety programme for 26/27 and will continue to do so as needs arise to prioritise in-year. Language used in our Plan of Work does not explicitly mirror that used by Government, recognising Ofcom’s role in translating areas of focus into concrete outcomes and actions. As required under the OSA (and noted in our draft Plan of Work, Ofcom will provide a review of our work to date to deliver against the SSP in Ofcom’s Annual Report and Accounts, which will be published in the Summer.

As an example of such, ‘safety by design’ is embedded across our Plan of Work and referenced as one of our long-term goals. There are many definitions of safety by design, but we think it can be broadly described as a proactive approach to integrating safety considerations into the design cycle of products, systems or processes. This includes making iterative improvements to existing systems on longstanding services or features. It also can include retirement (replacing or removing a feature or functionality altogether), as well as ensuring new services or features are designed with safety in mind from the outset.

Promoting strong risk management and governance processes is key to ensuring services have the right systems and processes in place to promote safety by design. We expect that providers should have effective corporate governance in place to oversee the management of all risks identified in their Illegal Harms and Protection of Children risk assessments, including those that are not addressed by measures in the Codes. These risk assessments continue to be a key focus of our compliance work in 2026/27, and we have already seen this area make an impact. As a recent example, Snap Inc has recently undertaken a comprehensive reassessment of the risk levels previously assigned across all harms in response to our engagement under our enforcement programme.

A key objective of the OSA is that online services are designed and operated in way that protects users from harm, including harm caused or amplified by algorithms. It requires online services to assess the risks posed by algorithms and to take or use measures relating to algorithms to achieve specific safety outcomes.

Considering vulnerable users and protected characteristics is important when assessing the risk of illegal content and content harmful to children. All services should take user base demographics into account in their risk assessments. This includes considering how the gender and age of users affect the assessment of risk, as well other protected characteristics such as race and disability. These dynamics are highly complex and context-specific, and evidence is provided in the Register of Risks and Children’s Register of Risk on user base demographics and its impact for each kind of illegal content and content harmful to children.

Protection of Children

The National Association of Head Teachers (NAHT) notes that Ofcom should consider additional actions for social media companies and online providers to protect vulnerable young people such as those without strong family or friendship networks or those with additional needs who may fit age requirements but whose understanding and skills to navigate online communications are minimal. It also notes that the current approach to generative AI is not sufficient to protect children from illegal and harmful content and urges Ofcom to proactively monitor online providers to assess new and emerging threats. It further notes that while the Grok investigation is a positive step, this type of investigation and enforcement should be extended to all online providers and not focus solely on the high-profile ones. The NAHT also expresses support for the progress made on age verification but notes a concern that these approaches can be easily circumvented with the use of VPNs.

The British Standards Institute directed our attention to their work on Age Assurance Standards and how their approach aligns with the regulatory approach to age assurance. It also noted further standards in development for late 2026/early 2027 as well as European standards development in this area that also takes account of data security and cybersecurity.

We share NAHT's concern about the risks that new GenAI tools pose to young people. Many of these have been documented in our policy guidance and discussion papers, including our recent research into [GenAI search services](#). Where GenAI tools (including chatbots) are in scope of the online safety regime, we are taking steps to ensure that providers are complying with their relevant duties. We recently fined the provider of a nudification app for failing to introduce appropriate age checks and have ongoing investigations into an AI companion chatbot provider for a similar suspected compliance breach. We are also supporting Government as it takes steps to address regulatory gaps in the OSA, which would ensure that both children and adults are better protected from the harms posed by GenAI tools in the years to come.

VPNs are not banned in the UK and are in common use here and in many other countries. VPNs can offer privacy and anonymity benefits however, as noted by NAHT, they offer an opportunity to circumvent the protections afforded by the OSA. Platforms must not encourage or direct UK users to circumvent age checks and we continue to monitor whether VPN use is rising amongst children. We are confident that the rules brought in last year are already offering significant protections to children – research shows that most children stumble across pornography by accident rather than seeking it out deliberately.

We are following closely the work of the British Standards Institute (BSI) and other standards bodies to develop technical standards for age assurance and welcome BSI's work. As our [Guidance on Highly Effective Age Assurance](#) sets out using a service certified against a standard or scheme is not an automatic means of compliance, but it may help to evidence that a service has had regard to our criteria to ensure that its age assurance process is highly effective. We remain committed to the work to drive forward the development of technical standards. As such, we will continue to monitor and assess whether these standards are sufficiently aligned to our criteria. If we consider in due course that conformance with such technical standards would help service providers to demonstrate compliance with their duties under the OSA we will update our guidance to reflect this.

Risk Assessments

Skyscanner suggest expanding the list of illegal priority harms creates disproportionate burdens in low-risk services. Skyscanner further suggests that Ofcom should introduce a streamlined risk-assessment process for safe, low-risk firms. It also recommends limiting mandatory review frequency for such services to moments when meaningful product changes occur, helping reduce unnecessary burdens while still ensuring user safety.

Ofcom does not determine which harms to assess; the list of priority illegal harms is set by Government and approved by Parliament. We have issued two Registers of Risks ([Register of Risks](#) and [Children's Register of Risks](#)), [Illegal Content Judgement Guidance](#) and [Guidance on Content Harmful to Children](#) to support providers to understand these harms on user to user and search services.

The OSA requires services to assess all risks of harm; where services consider the risk of specific harms to be negligible, they should justify this in their risk assessment record.

While we have issued two pieces of guidance to support service providers conduct a risk assessment to meet their duties, and to keep oversight of this, providers can decide how to structure and run their internal risk assessments. Services can have streamlined or complex approaches, as suits their business model and operational capabilities as long as they are able to demonstrate how they meet the risk assessment duties in the OSA.

The requirement in the OSA to assess the risk of significant changes to their service reflects the dynamic nature of the sector, including changes in user behaviours and how harms manifest. Ofcom is not able to exempt service providers from this duty.

Fees

Skyscanner suggests that Ofcom's proposed OSA fees regime is unfair because it relies solely on Qualifying Worldwide Revenue, meaning many low risk, responsible businesses would be required to pay fees despite posing minimal regulatory burden. It calls for Ofcom to commit in its Plan of Work to exploring targeted mitigations and exemptions to create a more proportionate fees framework.

We have explained our approach in our [Statement on Online Safety Fees and Penalties](#). In setting our fees policy, we have given strong regard to the Secretary of State's stipulated principles of proportionality, stability and transparency and the direction to minimise impact on small to medium sized enterprises. We have structured the fees regime so that the cost of regulation is spread across industry in the most fair and proportionate way possible.

We have decided that it would not be appropriate or proportionate for Ofcom to take account of risk when setting fees. This is because the drivers of risk and the likely impact of such risks will vary over time and across different types of regulated services. However, we and the Secretary of State for DSIT have committed to a review of the Online Safety Fees regime once we have obtained evidence from the first operational year of the regime. This may include reviewing exemptions for certain sectors which are perceived to be 'lower risk'.

Providers can visit Ofcom's dedicated webpage about Online Safety Fees for relevant timelines and links: [Online safety fees: what the duties are and how to comply with them](#). We encourage providers to contact the team (osfeesregime@ofcom.org.uk) if they would like to discuss any aspects of the process.

Evaluation work

The Welsh Government express an interest in supporting the evaluation of impact and understanding more about the intended evaluation process. It welcomes Ofcom's commitment to continuing international partnerships in this space and emphasised the importance of a collaborative, international approach.

Meanwhile, the Trust Alliance Group supports Ofcom's commitment to shifting from compliance toward real, measurable improvements for users, and to monitoring whether environments are becoming safer. It suggests identifying barriers that organisations encounter when translating regulatory expectations into reality and offer their support. NAHT also asks Ofcom to scrutinise safety features announced by major providers and ensure it materially improves children's safety and experiences.

Skyscanner suggests that Ofcom should support the Government's review of the OSA's scope by ensuring only services posing genuine harm are regulated, using its evidence base to recommend which service categories should be added or removed. It calls for Ofcom to include a periodic scoping exercise in its 2026/27 Plan of Work to enable a more focused, lower burden regime that better aligns regulatory effort with actual risk.

Ofcom maintains its commitment to working with international partners, including through ongoing engagement facilitated by our international team, and notes that we have recently shared learning across our online safety and media literacy work with the Welsh Government.

We intend to work with partners in Government, law enforcement, civil society groups, industry and academia to evaluate the impact of the OSA. This will include gathering evidence from a range of sources to evaluate whether service providers are making changes to their services, and whether this is translating into a safer life online for people across the UK. Where relevant, we will seek to understand why services are not implementing the measures recommended in our codes of practice, and, whether these measures are working as intended.

We will support the Government's review of the regulatory framework provided by the OSA, which must be carried out between two and five years after the last of the Part 3 provisions come into force. As per the OSA, we expect this review will consider whether regulation of services is proportionate, having regard to the level of risk of harm presented by regulated services of different kinds and to the size and capacity of providers. In the meantime, we will publish reports relating to the risk of harm, such as our review and report on content harmful to children.

Categorised services

News Media Association welcomes progress on OSA implementation, with recommendations of how Ofcom can protect both content of democratic importance and 'Recognised News Publishers' (RNPs). Suggestions include publishing clear expectations for Category 1 service providers on their duties for news publisher content, journalistic content, and content of democratic importance, encouraging standardised transparency reporting and broadly being rigorous with enforcement. It says that Ofcom must engage in a meaningful manner with recognised news publishers to understand their experiences of how their content is treated on Category 1 services, how complaints are dealt with, and it must not refrain from naming specific platforms, nor must it hold back on producing a provisional notice of contravention if it suspects non-compliance.

The Scottish Government's Digital Citizen division welcomes our work on categorised services and notes the importance of considering those across various groups who may be vulnerable online.

Which? asks that Ofcom try to ensure implementation of additional measures within the Illegal harms Codes of Practice are not subject to delays and codes are implemented as soon as possible. It also asks Ofcom to expedite the publication of the register of categorised services and final statement on fraudulent advertising duties. Which? further suggests Ofcom explore the merits of introducing specific mitigations for AI-enabled advertising fraud.

We plan to publish the register of categorised services and list of emerging Category 1 services alongside our consultations on the majority of additional duties that apply to categorised services in July 2026. These consultations will cover duties relating to fraudulent advertising, terms of service, user empowerment, ID verification, news publisher content, journalistic content, and content of democratic importance. We will aim to publish our final policy statements as soon as possible, by mid-2027. We are committed to meaningful stakeholder engagement and invite and encourage formal, detailed responses to our consultations when they are published.

We are aware of the presence of AI-enabled fraudulent advertising on services that are expected to fall in scope of the fraudulent advertising duties. However, we are still undertaking policy development in this area, and the fraudulent advertising consultation is expected to be published

around July 2026. The proposals that will be included in our consultation will cover a range of interventions which will seek to disrupt fraudsters activity at both the account and content level. We are considering what can be done, within the legislative framework, to address the challenge of AI, as it makes it easier and cheaper to create fraudulent advertising content.

Learning from international partners

The Trust Alliance Group supports the approach to learning from global developments and identifying opportunities for regulatory alignment. The Online Dating and Discovery Association welcomes Ofcom's commitment to the importance of partnerships, especially at an international level.

Ofcom remains committed to engagement with international partners working on online safety, including through the [Global Online Safety Regulators' Network \(GOSRN\)](#), and our [technical trilateral cooperation group on age assurance](#) with the eSafety Commissioner in Australia and the European Commission.

Implementation

The Online Dating and Discovery Association notes that many implementation dates for 2026 are approximate and subject to change, making it hard for firms to plan effectively. Whilst the Welsh Government support the view that content moderation needs to improve across social media, it welcomes engagement with Ofcom to identify the impact of platforms on communities and promotion of Ofcom's enforcement and implementation efforts.

We note the challenges raised by The Online Dating and Discovery Association and seek to provide as much forward notice of upcoming milestones and new duties coming into effect through our communication channels, including our [Online Safety Roadmap](#) and our [Industry Bulletin](#).

Working with smaller organisations

The Online Dating and Discovery Association requests Ofcom develop a better understanding around the impact of the OSA on smaller firms and specifically innovation.

A key focus for Ofcom as we implement the OSA has been to develop an extensive programme of work dedicated to making the regulations easily understandable. This work is designed to support a smoother journey to compliance, particularly for smaller firms. It has been underpinned by interviews, workshops and research with a diverse range of online services – more than 50 businesses and individuals – to understand the barriers to compliance and ensure the tools and resources we provide meet the needs of different service providers. These resources can be found in our [guide for services](#), a hub for all our guidance and tools. These resources have been developed with individuals and small or medium-sized enterprises (SMEs) in mind and based on their feedback and input. Ofcom is committed to understanding industry needs, particularly those of smaller firms, so that we can continue to iterate and improve the support we offer.

We are also seeking to understand awareness, impact and implementation of the OSA among services, including SMEs, which will inform our wider strategic approach.

Business Disruption Measures

ISPA supports Ofcom's role in enforcing content standards but emphasises that the OSA's Business Disruption Measures could create significant operational and technical impacts for ISPs. It urges Ofcom to engage early with providers, ensure any such measures are proportionate and clearly scoped, and offer clear guidance and realistic timelines.

Ofcom recognises the potential impact on stakeholders arising from a successful application for Business Disruption Measures under the OSA. The decision as to whether it is appropriate to apply for Business Disruption Measures will be based on our assessment of the harm and non-compliance

in each individual case. However, as part of our analysis of the specific form the Business Disruption Measure should take, we will consider the potential impact on the stakeholders that the measure(s) will apply to and where possible, ensure that any requirements are compatible with existing systems and that the burden on the stakeholders is minimised.

Before making any application for Business Disruption Measures, Ofcom would, at a minimum, engage with relevant stakeholders to notify them of the intended application. In some cases, further engagement may also be necessary.

Fraud

The Online Dating and Discovery Association expresses disappointment on how little fraud is mentioned in the Plan and requests Ofcom take a firmer position and wider view on the relationship between online safety and fraud. It requests Ofcom carry out fraud risk assessments on every code, guidance document, or additional measure to understand where and how criminals could exploit vulnerabilities.

Which? suggests there is evidence of recommender scam content on online platforms and Ofcom expand the scope of its proposed recommender system policy to include fraud content. Which? also states Ofcom should maintain an objective component, such as number of users, when determining whether services should have enhanced duties around fraud detection.

The OSA places a range of responsibilities on online service providers in order to protect their users from illegal harms. For example, the OSA requires providers to assess the risks associated with services' functionality, and to mitigate those risks accordingly. The illegal content safety duties, which include fraudulent content, came into effect last year and are currently being enforced.

We recognise that, while the illegal harms duties apply an important baseline, there is more that needs to be done by regulated services to tackle online fraud. With this in mind, in June 2025 we launched a [consultation on a targeted set of additional safety measures](#) designed to strengthen our illegal harms codes.

Our proposals include measures that recommend the expanded use of proactive technologies, such as automated tools to detect harms like fraud. We have also proposed the preparation and application of a user sanctions policy in respect of users who generate, upload or share illegal content that is prohibited on the service (for example fraudulent content). The consultation closed in October 2025, and we are currently expecting to publish our statement by autumn 2026.

Additionally, we are developing our Fraudulent Advertising Codes of Practice and expect to consult on these around Q2 2026/27. These will set out measures that we recommend the largest services (in Category 1 and Category 2A) take for the purpose of complying with the fraudulent advertising duties in the OSA. The fraudulent advertising duties require that these services put in place systems and processes to prevent individuals encountering fraudulent advertisements.

Where services fail to meet their duties under the OSA, we have strong enforcement powers at our disposal.

Nudification apps

The Welsh Government asked what role Ofcom might play in supporting the UK Government's plans to ban nudification apps.

We welcome the steps the UK Government is taking within the Crime and Policing Bill to criminalise the creation and supply of nudification apps. Assuming that the Bill is granted Royal Assent, we are working closely with the Government to consider how this new criminal offence will interact with the OSA.

Media Literacy

The Welsh Government welcomes continued engagement with Ofcom Cymru, particularly around media literacy and digital resilience in Wales. It notes ongoing work on media literacy, including a pilot initiative for adults based on Ofcom's media literacy framework. It urges Ofcom to explicitly prioritise efforts around misinformation and misleading content online. It also asked if Ofcom had plans to consider the impact of AI upon media literacy and ways in which AI can be used to support an increase in media literacy skills.

NAHT continues its support for Ofcom's recommendations around media literacy but maintains these recommendations should be strengthened into Codes of Practice to ensure uptake across all providers. Which? asks Ofcom to set out steps for services of all sizes to promote media literacy and steps to raise awareness around potentially fraudulent content. The British Standards Institute mentioned the potential need for standard focussed on AI literacy to better support users.

Our media literacy strategy has three elements to it – research, evidence and evaluation, engaging platforms and people, and partnerships. We address mis and disinformation in each of these areas over the course of the 3-year strategy. We have detailed below a small selection of community projects that most directly address the above feedback, rather than listing the full breadth of our work on mis- and disinformation across the programme. Our [Making Sense of Media Delivery Plan December 2025-March 2027](#) sets out our progress since October 2024 and upcoming projects.

Untold Stories supports 2,250 people (from primary school age to older adults) to recognise mis and disinformation and better identify professionally produced news in five boroughs in London, four boroughs in Manchester, and in the Highlands of Scotland. In Wales, we are into the second year of a three-year project with Cwmpas, who we have commissioned to run media literacy initiatives in Rhondda Cynon Taf. These projects contribute to the evidence base on what works in delivering media literacy. Ofcom will disseminate findings from these projects so that they can be leveraged by others who are developing media literacy programmes or initiatives about mis and disinformation.

We have recently commissioned a programme called Informed Voices to support first time voters in Wales and Scotland identify mis and dis information in the context of the election.

In addition, we have also been considering the skills needed to engage positively with AI. While there will be new skills and knowledge required, many of the skills needed are about applying media literacy skills in new contexts. To reflect this, we will be updating our media literacy outcomes bank to help support organisations considering media literacy skills relating to AI.

Whilst the OSA requires Codes of Practice in other areas, its media literacy duties are placed upon Ofcom, rather than on platforms. However, many of the measures in the Codes do have media literacy related outcomes. In addition, we recently [consulted on a Statement of Recommendations](#) which sets out what we believe good looks like. Whilst this is not enforceable in the same way as some elements of the OSA – we believe there is merit in setting out this view.

In Autumn of 2025 Ofcom published our consultation on 'How to Promote Media Literacy' that set out steps that services of all sizes can take to promote media literacy; this includes potentially fraudulent content. We expect to publish our final guidance this Summer. Separately, our [Media Literacy by Design Principles](#), published in 2024, now have five major adopters: Google Search, The LEGO Group, Pinterest, Roblox and TikTok.

Ofcom has engaged directly with the British Standards Institute, and we agree that the growth of AI will require both enhanced media literacy skills and thoughtful operating models and governance.

We are updating our bank of outcomes, indicators and survey questions to include a new outcome on AI. While there will be new skills and knowledge required, many of the skills needed are about applying media literacy skills in new contexts.

Cross –cutting themes

Future of TV

Good Things Foundation welcomes Ofcom’s continued involvement in the Government’s consideration of post-2034 TV distribution. It recommends Ofcom examine a full transition to IPTV through a digital inclusion lens, using it as a chance to improve skills, confidence, and access to affordable connectivity and devices. It also highlights the need to compare the costs and benefits of a fully planned IPTV transition - including support schemes - with the alternative of maintaining a hybrid system that may cause disruption both now and later in the 2030s.

The Welsh Government supports the work on the future of TV distribution and maintaining universal PSB access, while stressing that policy decisions must reflect the specific needs and viewing habits of audiences in all nations, including Wales.

We welcome the Good Things Foundation’s interest in the Future of TV Distribution debate. As we said in our [report to Government](#), the migration from DTT to IPTV will most likely need a planned campaign to support people in getting connected and confident. While this will take careful planning, an inclusive transition will have wider benefits for digital inclusion. We are continuing to work closely with Government, providing evidence where possible, ahead of its decision on the future of terrestrial television.

Ensuring all consumers and businesses are supported through legacy service transitions remains a key priority for Ofcom. Last year, we interviewed 70 people from across the UK, including many who face unique forms of digital disadvantage, to deepen our understanding of the barriers to broadband take-up. Our findings are published in our [Barriers to Household Connectivity](#) report. This report will continue to inform our work on media literacy, user empowerment and our [Inclusive Research Programme](#).

Stakeholder Engagement Transparency and Procedural Consistency

Better Media suggest that inconsistent engagement practices weaken trust in Ofcom. It calls on Ofcom to use the Plan of Work to review and strengthen these processes, including publishing a stakeholder engagement transparency framework that sets out who Ofcom meets, the principles guiding access, and how engagement shapes policy. It also proposes a public engagement log for key workstreams and clearer communication of opportunities to smaller, less-resourced organisations to ensure fair and balanced participation.

Ofcom is committed to fair, transparent and inclusive engagement. We follow a clear set of [principles](#) for all public written consultations, which are published on our website, to ensure consistency in how we engage. Responses to our written consultations are also published on our website, unless they are confidential.

We recognise the importance of hearing from a wide range of stakeholders to inform our policy-making. For proposals across our remit, we run public consultations and engage with stakeholders in other appropriate ways, and we seek to publish the evidence used in our decision-making wherever possible. Our engagement is supported by our teams across the UK, including at our Nations offices in Belfast, Cardiff and Edinburgh.

Our Approach to AI in our sectors

Several stakeholders including CAS and NAHT highlight AI developments in Ofcom regulated sectors and reference risks such as the growing risk of AI-enabled scams and the reputational risks for advice organisations when AI misinterprets their content and AI tools recommending harmful content;

chatbots exposing children to explicit content; lack of safeguarding and support, and emerging risks like ‘nudification’.

CAS and NAHT call for Ofcom to continue to understand and monitor the impacts of AI. They also call for stronger regulation, oversight, and enforcement to prevent misuse, ensure proper testing, and protect consumers across the UK-enabled scams and the reputational risks for advice organisations when AI misinterprets their content.

The Welsh Government asked for an update on how Ofcom will regulate AI, while the Foundation for Information Policy Research suggests Ofcom expands its horizon-scanning work related to AI and strengthen collaboration with academic and civil society experts. Twilio voices support for a pro-growth focus on AI that allows businesses to experiment with use cases and deploy AI at scale without risking sensitive data or consumer trust.

We will continue to understand and monitor the impacts of AI across all of our regulated sectors, including around online safety: we will consider AI in our approaches to scams, chatbots exposing children to explicit content, lack of safeguarding and support, and nudification (our responses to these issues are under the relevant themes in this document). Beyond online safety, we will continue to do horizon scanning work, something we conduct extensively, particularly in areas of emerging technology. To assist with our understanding of this fast-moving space we currently engage with academic and civil society experts, and we will continue to do so. Ofcom’s duties have always included encouraging growth and investment to ensure we deliver for tomorrow’s citizens and consumers, as well as today’s – our approach to AI is no different. Our [letter to government](#) covers this in more detail, including our approach to AI.

For the last two years we have published our strategic approach to AI. We will publish the third edition later in the year. This strategy paper will cover our AI plans in more detail.

Business Champions

Margræthea Telecommunications, Comms Council UK and FCS voice support for internal business champions to support economic growth and ensure the business market and its unique value chain are represented during policy discussions.

We don’t currently have plans to introduce internal “business champions”, but we absolutely recognise the importance of reflecting market perspectives in our work, including where this helps us consider the impact of our decisions on economic growth. We currently draw on business input through formal consultations, workshops and roundtables, direct engagement with our policy and economics teams, our Nations Advisory Committees, and regular conversations with trade bodies. Our view is that strengthening these existing channels, rather than creating new internal structures, is the most effective and proportionate way to ensure business voices are reflected in our decisions.

Digital Markets

VodafoneThree raised the substantial market power of Apple and Google over mobile operating systems and suggest Ofcom consider whether this market power is leveraged in ways that negatively affect the UK mobile market.

We will continue to support competition and the best outcomes for customers and businesses when considering the impact of digital markets on communications and media sectors in the UK. We will do so by engaging with a range of stakeholders, including in the mobile sector, and with the Competition and Markets Authority under our [Memorandum of Understanding](#) under Part 1 of the Digital Markets, Competition and Consumer Act.

Performance data

ACS welcomes Ofcom's draft Plan of Work but says it is hard for stakeholders to judge progress against work because performance data is spread across multiple reports. It recommends including clearer performance metrics and a "Nations Snapshot" so each UK nation's experience is visible in one place. The Welsh Government requests a more granular breakdown of research data to enable Wales-specific analysis, and seeks greater involvement in research planning, including ensuring sufficient high-quality data and, where appropriate, Wales-focused research.

We welcome feedback as to how we can best convey the impact of Ofcom's work across our regulatory remit and the UK's Nations. Within our available resource, Ofcom already produce a range of metrics on our annual performance against objectives, alongside summaries of our key work in the Nations, as part of our Annual Report (which is laid before the UK, Scottish and Welsh Parliaments and Northern Ireland Assembly). We also conduct and publish qualitative and quantitative research across regularly – including through our Power BI dashboards and datasets alongside our annual set-piece Connected Nations and Media Nations reports.

When possible, we provide nations specific breakdowns in our research. We recognise the importance of nation-specific research, as reflected in our annual [Media Nations](#) and [Connected Nations](#) reports, and will continue to consider this as part of our research activity.

Strategic Planning and Transparency

Stakeholders raised questions around sequencing of the Plan of Work and how Ofcom explains its work and costs. The FCS asked Ofcom to revisit its Plan of Work once the Government's SSP is published, UKCTA comment call for draft budget publication alongside the Annual Plan of Work, with costs according to work programme. PXC also requested greater transparency on how Ofcom assesses and manages the cumulative impact of overlapping regulatory initiatives.

We have developed our Plan of Work for 2026/27 in the context of the UK Government publishing its updated draft [Statement of Strategic Priorities \(SSP\)](#) for telecommunications, spectrum and postal services. We are actively engaging with Government as the new SSP moves towards designation.² The SSP is designated for the duration of the current Parliament (which is set to end, or dissolve, no later than December 2029). Once designated, Ofcom needs to detail how we will take it into account while undertaking our work and we will obviously have several more Plan of Work cycles under the new SSP (if designated).

Each year, we publish a comprehensive Financial Review as part of our Annual Report and Accounts, setting out our financial performance, operating income, expenditure, and other key information. This report is formally laid before Parliament, reflecting Ofcom's accountability to Parliament for the way we use our funds and carry out our regulatory duties. We also report on crosscutting regulatory work, illustrating how our responsibilities intersect across the communications sector.

Alongside the publication of our final Plan of Work, we also publish tariff tables setting out costs associated with our work programme.

² A draft SSP was laid before Parliament on 11 February 2026. Subject to completion of the procedural steps in section 2C of the Communications Act 2003, it will replace the 2019 SSP once it is designated by the Secretary of State.

Proportionality of Regulation Burdens

UKCTA highlight the administrative fees regime with a suggestion that with the TAR concluding, the funding burden should shift. BT raises the need for proportionate regulation and that there are opportunities to reduce regulatory burdens across the sector.

As well as seeking to promote growth in the rules we set, we also try to ensure that how we regulate doesn't place unnecessary burdens on industry. We do this in two ways: identifying opportunities to deregulate where rules are no longer needed or are outdated; and actively streamlining our regulatory approach, so that businesses interacting with us face fewer costs and receive a more efficient service. We have a bias against intervention, and all our regulations must be proportionate, evidence based and targeted. We are contributing to the Government's commitment to reduce the administrative burden of regulation by 25% over this parliament. We are working closely with DBT and DSIT on the Government's commitments in this area. Internally, we are actively exploring how we can use AI to drive efficiency in our operations and streamline our processes.

Enabling Investment, Innovation & Future Readiness

BT suggest a need for clarity on mobile investment and connectivity improvements, with a suggestion that legislation may need updating to reflect market realities. BSI welcome conversations with Ofcom to strengthen UK capabilities in standards development

Action to deliver further improvements and investment in mobile connectivity requires coordination between Government, local authorities and industry as well as the regulator. We will set out later this year our view on what more can be done, and are committed to providing better data and evidence, which will help decision-makers deliver improved outcomes for consumers.

Environment and Sustainability

The Welsh Government questions why there is little focus on sustainability and climate changing underpinning Ofcom's Plan of Work.

We have an interest in the long-term sustainability of our sectors, but our statutory duties do not currently include attaining any specific environmental (including climate change) objectives.

Accessibility and Representation considerations

NADP highlights the importance of embedding accessibility at an early stage in the development of communications services, noting that late consideration can lead to avoidable delays and additional costs. It calls for the involvement of people with lived experience of hearing loss in research and decision-making processes, including their employment at Ofcom. NADP also comments on Ofcom's diversity and inclusion approach, acknowledging progress to date but suggests that people with hearing loss could be more explicitly recognised, including through representation targets in areas that directly affect them.

Ofcom recognises the importance of inclusive research design and the involvement of people with lived experience in informing policy development. In 2024, we published guidance on [inclusive research design](#), which sets out the importance of embedding inclusivity from the outset of research activities. This work was informed through engagement with stakeholders with expertise in inclusive research practices and was undertaken in partnership with the [Communications Consumer Panel](#). In addition, Ofcom routinely receives advice from the Communications Consumer Panel and the Advisory Committee on Older and Disabled People, which helps inform our understanding of the experiences and needs of different consumer groups, including people with hearing loss.

Ofcom has exceeded its organisation-wide 15% disability representation target, which we remain committed to maintaining. Colleagues with hearing loss are already reflected within this representation and supported through our disability network SOUND, which is an important internal voice championing accessibility and lived-experience insight across our work. As we evolve our Diversity and Inclusion strategy, we will continue to maintain strong visibility and inclusion for colleagues with hearing loss, particularly in areas where their expertise can help shape better outcomes.

Nations and International

The following section builds on the UK-wide priorities set out above and focuses only on material differences or additional considerations raised in the Nations or International context.

Scotland connectivity and depopulation

CAS and Bòrd na Gàidhlig raised concerns around rural and island connectivity in Scotland; and how resilient connectivity must be improved whilst also tackling depopulation and community sustainability.

While there are a range of policy areas involved in tackling rural depopulation and supporting community sustainability, we recognise the key role which enhanced digital connectivity plays. Ofcom plays our part through regulation which supports the continued growth of resilient and affordable connectivity options to all consumers across fixed, mobile and other wireless technologies. Progress is demonstrated by the increases in fixed and mobile coverage in rural and island Scotland as summarised in our recent [Connected Nations](#) reports, but we note that connectivity gaps still remain.

Recognition and support for Gaelic Media

Bòrd na Gàidhlig and the Scottish Government were disappointed by the limited recognition of Gaelic broadcasting, beyond a single mention of MG ALBA in the draft Plan of Work. They urge Ofcom to embed a stronger narrative on the importance, challenges, and missed opportunities for Gaelic media within the BBC Charter renewal work. The Scottish Government ask for clear and substantial commitments to Gaelic broadcasting to match commitments to Welsh broadcasting.

As a UK statutory body, funded by the Scottish Government, the future of MG ALBA is first and foremost a process for Governments and Parliaments to consider. However, we recognise the valuable contribution MG ALBA makes to Scotland's broadcasting landscape and note that options for providing more certainty over its funding will be a feature of the UK Government's BBC Charter Review process. In the year ahead, Ofcom will continue to carry out its duties in appointing Board Members to MG ALBA as a number of Board terms are set to expire.

Scotland media landscape and representation

The Scottish Government highlights the fragility of Scotland's media landscape, particularly where regional news provision is weakened. It raises concerns about UK-wide public service news misrepresentation or overlooked devolved responsibilities leading to inaccurate or misleading coverage of Scotland. The Scottish Government suggests that Ofcom must ensure UK network news meets its obligations to reflect the UK's nations accurately and calls for the 2026/27 Plan of Work to reinforce Ofcom's role in protecting the availability, prominence and sustainability of trusted public service content, especially content that provides strong and accurate Scottish representation. The Scottish Government additionally asks for stronger commitments at a nation level in the Plan of Work to Ofcom's role in supporting regional representation and portrayal, as well as delivering positive outcomes for audiences in Scotland.

The BBC, S4C and Channel 3 licensees are required to provide regional news. The BBC, ITV, STV and S4C also deliver extensive online news articles about the nations and regions and make their regional bulletins available on their Broadcast VoD services. News provided on television and radio

by Ofcom-licensed broadcasters, including the PSBs, is subject to [Ofcom's Broadcasting Code](#) which includes standards to ensure that news is reported with due accuracy and presented with due impartiality. Our work, including Media Act implementation and on news and PSB discoverability will look to support audiences across the UK to access and find public service media, including news.

Informed Voices Project Outcomes

ACS welcome the 'Informed Voices' project supporting young voters in Scotland and Wales but want more detail on delivery and impact measurement.

Parent Zone has been commissioned to deliver this programme for this year's Scottish and Welsh elections, in partnership with Young Scot and ProMo Cymru, respectively. The programme will co-produce with young people an online campaign around mis- and disinformation concerning online content of democratic importance by way of social media content and other online resources, as well as engaging with local stakeholders. The impact will be measured against outcomes in Ofcom's [outcomes bank](#), including 3.1 Better understands mis- and dis-information and 3.2 Better understands the importance of evaluating information. The evaluation will measure reach, and young voters' increased awareness, confidence and knowledge of affirmative action and factchecking of information as a result the programme activities.

Welsh Government Partnership and Engagement

The Welsh Government welcome closer collaboration on how Ofcom's levers can support digital innovation, and values Ofcom Cymru's partnership commitments for Wales, including Welsh-language impact assessments, updates on the Media Act and Public Service Media review, support for broadcasting standards and online safety during and after the Senedd election, convening on digital infrastructure, delivering media literacy with partners, and facilitating the use of Welsh language services. The Welsh Government also suggests a planned early conversation on Ofcom's Plan of Work as agreed to in the updated MOU between the Welsh Government and Ofcom did not take place this year and seek Ofcom's commitment for the years ahead.

Ofcom remains committed to consulting the Welsh Government on our draft plan of work, as set out in the [Memorandum of Understanding](#) between the Welsh Government, Senedd Cymru, UK Government and Ofcom.

Resourcing at Ofcom Wales

The Welsh Government calls for an increase of staff at Ofcom Wales and transparency regarding the number of colleagues working in Ofcom Wales and Ofcom for Wales.

We remain committed to Schedule 1, paragraph 3 of the Communications Act 2003, which requires Ofcom to maintain offices in England, Scotland, Wales and Northern Ireland. The Wales Office ensures the unique communications interests of people in Wales are included in Ofcom's policymaking and that Ofcom's work is understood in Wales.

International engagement and digital sovereignty

Foundation for Information Policy Research note cross jurisdictional issues and recommend that Ofcom develop a strand of exploratory work and a mapping exercise on digital sovereignty. Comms Council UK asks if Ofcom will commit to following the developments of the EU Digital Networks Act which will impact operators, consumers and policies in the UK.

Ofcom's International Team monitors legislative developments around the world that impact the stakeholders and markets that we regulate. As such, we have been monitoring, and will continue to monitor, developments around the EU's Digital Networks Act.

We also note that digital sovereignty is ultimately a matter for the Government. However, we continue to keep relevant developments under review through our ongoing horizon-scanning work and will engage with such developments where appropriate within Ofcom's remit.