

Your response

Question	Your response
<p>Question 1: Do you have any comments on Ofcom's proposed Work Plan for 2026/27?</p>	<p>Confidential? – N</p> <p>The Advisory Committee for Scotland (ACS) advises Ofcom about the interests and opinions, in relation to communications matters, of persons living in Scotland. The response from the ACS to this consultation draws on the knowledge and expertise of ACS members and is informed by our individual experience and through discussion at our meetings. It does not represent the views of Ofcom or its staff.</p> <p>General comments</p> <p>The Advisory Committee for Scotland (ACS) welcomes Ofcom’s proposed Plan of Work 2026/27. The most recent comprehensive data typically available during this consultation is the previous July’s Annual Report. While we recognize that in-year progress is tracked across various themed reports, the absence of a consolidated snapshot makes it difficult for stakeholders to calibrate feedback against current delivery.</p> <p>To assess if the draft Plan is realistic and achievable, it would be helpful if the draft Plan explicitly included current Plan performance metrics. Stakeholders can seek up-to-date performance data across various themed reports or view the previous year’s annual report, but it would be helpful to streamline this information for the draft Plan consultation.</p> <p>We also suggest that future plans incorporate a Nations Snapshot, providing a data-driven baseline of the consumer experience across the four nations. We recognise resource constraints, and suggest the data could be drawn from existing datasets that inform themed reports e.g. Media Nations, Connected Nations, Online Nations etc.</p> <p>Internet and post we can rely on</p> <p>The ACS supports the focus on promoting reliable mobile connectivity and the introduction of the Map Your Mobile tool. For these interventions to be effective in Scotland, we encourage Ofcom to continue building on innovative methodologies for gathering real-world data to ensure reported coverage matches the lived experience of residents in our rural and island communities. Connectivity remains a key priority in Scotland and we suggest that significant nation-level priorities, particularly for those in market-failure areas, should be driven as high-profile delivery projects within the main UK-wide list.</p> <p>We also suggest that the Telecoms Access Review (TAR) evaluate whether geographically differentiated regulatory tools, similar to the Hull Area framework, could be</p>

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	<p>used to support parity and accelerate investment in the most hard-to-reach areas of Scotland.</p> <p>The ACS is interested in how Ofcom will oversee infrastructure resilience as Scotland's data centre sector grows. Large-scale developments imply a substantial shift in energy demand; given the interdependence of digital and power networks, grid instability risks communications outages. We suggest Ofcom may apply its growth duty to coordinate grid resilience, ensuring industrial demand does not compromise reliability for residential consumers.</p> <p>There are references throughout the document about supporting vulnerable consumers. We suggest that treating vulnerability as an embedded theme rather than an explicit project may dilute the development of crisp, measurable actions and outcomes. We also advocate for a specific focus on compound vulnerabilities. to ensure that essential service protections are tailored to those with multiple barriers. As the UK-wide PSTN switch-off date approaches, we expect the Plan to prioritise the protection of vulnerable Scottish consumers.</p> <p>Media we trust and value</p> <p>The ACS supports the priority given to the implementation of the Media Act and the discoverability (prominence) of public service media content on online platforms. As linear TV viewing declines, we are interested in Ofcom's plans to commission research in 2026 into how audiences discover and engage with public service news and children's content online, including a granular analysis of the Scottish context.</p> <p>The BBC Charter renewal process will be a critical driver of the media landscape throughout 2026. We look to Ofcom to ensure its regulatory oversight during this period protects the diversity and plurality of news for Scottish audiences, particularly those who remain reliant on linear services as their primary civic touchpoint.</p> <p>We live a safer life online</p> <p>We support the transition toward driving compliance and taking enforcement action under the Online Safety Act. Recent investigations into generative AI tools highlight the need for regulatory agility.</p> <p>We commend the publication of the finalised guidance on protecting women and girls online. We look forward to the 2027 progress report and would welcome the inclusion of a dedicated Scottish subset of data, given the different policy landscape in Scotland.</p> <p>We also seek an update on the feasibility research for an external individual redress mechanism, as required by the Online Safety Act. While the recent launch of a super-complaints process is a significant milestone, there remains an individual redress gap for consumers whose personal reports are not satisfactorily resolved by platforms.</p>

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	<p>Supporting young people, particularly first-time voters, to understand how to identify accurate information in advance of the elections in Scotland and Wales in 2026 as part of our Informed Voices project.</p> <p>Regarding media literacy, we welcome the Informed Voices project supporting young people and first time voters to understand how to identify accurate information in advance of the 2026 Scottish/Welsh elections. We are interested to hear more about the nature of the project and how impact will be evaluated.</p> <p>Enabling wireless in the UK economy</p> <p>The focus on spectrum sharing is highly relevant to Scotland’s technology and space sectors. We are encouraged by Ofcom’s pioneering approaches to sharing airwaves, such as the upper 6 GHz band. While these advancements are vital for future capacity and 6G readiness, it is essential that the focus on next-generation technologies does not come at the expense of basic connectivity for those in poorly served areas. We suggest that these innovation projects explicitly aim to ensure parity of access for rural and vulnerable consumers.</p>

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