



Written evidence submitted by the British Standards Institution to the Ofcom consultation on Proposed Plan of Work 2026-2027

Introduction

BSI is the UK's National Standards Body, incorporated by Royal Charter and responsible independently for preparing British Standards and for coordinating the input of UK experts to European and international standards committees. BSI has over 115 years of experience in serving the interest of a wide range of stakeholders including government, business and society. BSI has a public function in support of the UK economy and brings together stakeholders to facilitate the development of "what good looks like".

BSI operates in accordance with a Memorandum of Understanding with the UK Government. BSI represents the UK view on standards in Europe via the European Standards Organizations CEN and CENELEC and internationally via ISO and IEC.

BSI is the UK NSO of ETSI (The European Telecommunications Standards Institute) and chairs the NSO Group. In addition, BSI provides support to DSIT and Ofcom as part of the UK government's membership of the ITU (the International Telecommunication Union).

BSI's role as the National Standards Body

As the National Standards Body, BSI has extensive experience in bringing together experts in industry, government, academia and consumer representatives to capture what good looks like. BSI provides the infrastructure for over 13,000 experts, who are the voice of UK economic and social interests, to be influential in the international standards organizations. BSI has a public interest responsibility to develop and maintain the standards infrastructure to support UK emerging industries at home and internationally. BSI's robust standards development process requires open and full consultation with stakeholders to build consensus-based outcomes. This gives standards the legitimacy and degree of market acceptance to be used for public policy purposes. Each standard is kept current through a process of maintenance and review whereby it is updated, revised or withdrawn as necessary. This means that standards can evolve to meet market requirements or industry innovations.

Standards already exist across a number of related areas that can be utilised to deliver Ofcom's objectives. BSI can assist by bringing together stakeholders to map out the standards landscape and help shape necessary standards revisions, gaps and any new standards development to address Ofcom's requirements. Such research and assessment activities would take into account the UK market drivers whilst building upon existing European and international best practice (through BSI's involvement in CEN, CENELEC, ETSI, ISO, IEC, etc.).

BSI can also develop fast-track standards to help support innovation or an urgent market need. These options provide over-arching governance around representation, process, facilitation and content. Which route is appropriate will depend on the stability in the market, the pace of change and innovation anticipated and required, the maturity of best practice, the level of government prescription required, geography, timetables and the extent of stakeholder impact. Options for standards development include:



- BSI PAS: fast track standards development for areas of innovation, allowing a rapid initiation of standards in new areas.
- BSI Flex: flexible standards development for fast moving areas of best practice development – rapid and iterative approach that allows the standard to keep pace with emerging best practice.

These mechanisms work alongside and leverage the activities of our 1200 technical committees developing national, European and International Standards in established areas of standardization. Indeed, many BSI PAS and Flex standards provide the UK with first mover advantage by forming the basis of new ISO work items.

BSI's role in supporting Ofcom in delivering their strategic priorities

Economic Growth

Standards are powerful drivers of innovation and productivity for businesses. They can make organizations more efficient, successful and sustainable. Companies use standards to reduce risk, cut costs, win more business, enter new markets and grow more quickly.

In uncertain economic times, standards help restore confidence by allowing businesses to demonstrate operational performance. They also provide prospective investors, partners, customers and stakeholders with benchmarks of recognized organizational quality.

An independent study by the Centre for Economic and Business Research in 2022 found that 23% of all UK GDP growth and 38% of all productivity growth since 2000 is attributable to standards¹.

Standards have boosted the UK's annual GDP by £161bn since 2000. Standards help UK businesses to thrive on the global stage by being more productive, innovative, resilient and secure. They also help businesses to better serve their customers and to access global markets. Standards can do this for businesses of all sizes including Micro-businesses and SMEs.

In addition, the use of international standards between businesses trading globally can help to reduce production and supply chain costs, build confidence in business services and enhance consumer trust. For this reason, standards are considered to be a 'passport to trade' as they create a common technical language between businesses, consumers and regulators and apply across multiple jurisdictions. Within the UK, the use of standards is associated with £5.4bn of additional exports according to the study by the CEBR.

BSI's policy is to adopt international standards as British Standards to ensure that the collection of national standards reflects the latest international consensus on good practice for a specific product or service. This means that the same national standard will meet the needs of UK companies both on the domestic market as well as in the rest of the world.

The UK standards catalogue today consists of over 85% of international or European regional standards which have been influenced by UK stakeholders including consumers, regulators, trade union representatives and other interested parties as well as business and industry. By ensuring

¹ <https://www.bsigroup.com/globalassets/documents/about-bsi/nsb/cebr/bsi-uk-final-report-1.2-apr22.pdf>



that national standards reflect the latest international consensus, BSI is playing its role in reducing trade friction globally while ensuring that all those in the UK with a stake in a specific international standard have the greatest possible influence over its development.

Supporting regulation

Standards are widely used to underpin and support regulation, or as an alternative to regulation. Voluntary multi-stakeholder standards are already helping to deliver policy objectives across a wide range of areas, including technical product safety, good governance, climate change, energy, fair markets, and public confidence.

BSI is working closely with Ofcom to develop standards that support regulation in areas of online safety. Standards can support outcomes-based regulation by providing information to help target government intervention where it's most needed. For example, to ease pressure of enforcement and drive good practice across businesses.

BSI's national catalogue of standards includes standards developed in the European Standards Development organizations CEN, CENELEC and ETSI that underpin EU regulation. These standards are adopted in the national catalogue in order for UK businesses to have access to the necessary standards to operate and trade in the single market. Through BSI, UK experts provide input into these standards to ensure UK interests are considered in shaping international standards. Examples of current work under way include the EU AI Act harmonized standards and the Radio Equipment Directive (RED) standards.

Supporting digitization and reducing administrative burdens to business

BSI has been striving to reduce administrative burdens on UK businesses by improving access to standards and supporting business to understand how best to utilise standards. Across a number of digitization projects BSI has been exploring a roadmap that includes digital tools to make standards more user-friendly, through AI-driven search, and chat prompt and improved signposting across standards linked to regulatory content, and technical terminology databases.

This includes the rollout of SMART (machine-readable) standards. A joint IEC and ISO digital transformation programme focused on the digitalization of standards that can be machine accessible, readable and transferable to enable better industry adoption and alignment with regulation.

BSI has also been leading on initiatives to help business gain more understanding of the use of standards. The AI Standards Hub, a partnership between BSI, NPL and the Alan Turing Institute and supported by government aims to help stakeholders navigate and understand how standards can support their AI adoption².

² <https://aistandardshub.org/>



Dedicated to knowledge sharing, community and capacity building, and strategic research, the Hub seeks to bring together industry, government, regulators, consumers and civil society, and academia with a view to facilitate the assessment and use of relevant published standards. The Hub acts as a resource for developing knowledge and skills needed to effectively engage with the field of AI standardization. E-learning materials and in-person training events aim to equip stakeholders to actively contribute to the development of standards and to use and interpret standards that have been published. For example, training and webinars on the adoption of the new **AI Management System Standard ISO/IEC 42001**.

BSI has also been working collaboratively with InnovateUK on increasing SME capabilities in adopting AI technologies towards growth. Innovate UK's BridgeAI empowers businesses in high-growth sectors, driving productivity and economic growth through the adoption of Artificial Intelligence. The programme supported by BSI helps to bridge the gap between developers and end-users, fostering user-driven AI technologies. As part of this programme BSI has been working with SMEs to understand the needs and challenges of adopting/developing AI solutions across a number of key sectors. In addition, The BridgeAI Standards Community's mission is to support UK businesses in these sectors with high growth potential to use and adopt standards, helping them harness the power of AI in a responsible, ethical, and trustworthy way. The Community provides insights and guidance on key standards, research and use cases on successful adoption of AI, as well as the opportunity to collaborate through events, workshops, and online discussions³.

By investing in more programmes like these there is potential to empower key sectors to leverage standards, further accelerating trust and confidence in AI and helping them to realize AI's greater potential. This is becoming more important in a world where emerging and convergent technologies have the potential to exponentially change the way society and the working world functions.

Telecoms and Digital Infrastructure Security

International standards play a central role in the UK Government's approach to diversifying telecoms supply chains, as set out by the government's response to the [Telecoms Supply Chain Diversification Advisory Council](#). The report recognizes that standards are strategic instruments that shape market structure, influence competition, and support long-term security and resilience. By defining how telecoms technologies are designed, deployed, and interconnected, standards directly affect the range of suppliers that can participate in the market.

Standards that define common interfaces and protocols enable equipment from different suppliers to work together, lowering barriers to entry for new and smaller vendors and embedding security in the system. This interoperability allows network operators to adopt multi-vendor strategies, increasing flexibility and reducing vendor lock-in. The Government therefore supports continued engagement with industry-led international standards bodies to ensure that future technologies evolve in ways that promote openness and supplier diversity.

³ <https://community.bridgeai.net/>



BSI has been proactively working with DSIT to bring together the telecoms standards ecosystem to explore how we can support telecoms diversification. Given the global nature of telecoms supply chains, the Government places strong emphasis on international cooperation on standards development, and BSI have hosted the Advanced Connectivity Standards Platform to enable sharing of best practice across SDOs. Engagement with international partners and multilateral initiatives is intended to align approaches to openness, security, and interoperability across markets. This alignment helps ensure that diversified suppliers can compete internationally and that UK diversification objectives are reinforced rather than undermined by global market dynamics.

We would welcome conversations with Ofcom to build on these initial steps to strengthen UK capabilities in standards development. Supporting domestic industry and academia to participate actively in international standards bodies is seen as essential to ensuring UK interests are reflected in future standards. Aligning research and development activity with standards processes also helps ensure that innovations developed in the UK are standards-ready, internationally competitive, and able to contribute to a more resilient and diverse global supply chains.

One key area where BSI is leading the way in standardization is in quantum technologies. Recognizing the opportunity for UK to gain first mover advantage across quantum, BSI strived to secure leadership on quantum technologies in a way that provides competitive advantage for UK businesses. Through BSI's role as the UK's National Standards Body, the UK secured the secretariat for a new IEC/ISO Joint Technical Committee (JTC3) to develop global standards on quantum, we have positioned the UK to shape the future of this critical new technology by influencing international standards. This is the first step in delivering on ambitions set out in the UK Government's National Quantum Strategy, for the UK to lead global standards for quantum by 2033.

Building on these capabilities we see in the next phase of infrastructure development and the 6G rollout, consideration should be given to the integration of Quantum Key Distribution (QKD) technology. QKD offers significant potential for safeguarding sensitive data transfers and transactions, including financial services and critical government communications.

QKD leverages fundamental principles of physics and the properties of light to generate quantum-secure random keys for encryption and decryption. While embedding QKD within existing infrastructure may present interoperability challenges, emerging solutions—such as continuous-variable QKD—can often utilize current fibre-optic networks. Addressing these considerations now is essential to prevent vulnerabilities in the next generation of UK telecoms infrastructure that could be exploited by hostile actors.

Establishing appropriate standards in this space will provide the necessary guardrails to foster innovation while ensuring interoperability and mitigating operational risks.

Online Safety

BSI's [research](#) has found that almost half (47%) of UK adolescents wish they were growing up in a world without the internet, while 50% say a social media curfew would improve their lives. At the



same time, 42% had pretended to be a different age to access online content, highlighting the importance of reliable age assurance – the process for determining age of online users.

Despite this, fragmented approaches and ongoing concerns around privacy, security, bias and user acceptability have acted as barriers to effective age assurance. OECD research found just two in 50 online services aimed at children systematically assure age at account creation⁴.

The UK is proud to have initiated the international development of **ISO/IEC 27566-1 Age Assurance Systems – Framework**. Our UK experts have worked closely with international privacy and cybersecurity experts through ISO/IEC JTC1/SC27 to develop a privacy-preserving framework for age assurance. The standard supports online services in meeting child-safety duties under the Online Safety Act (OSA) while enabling innovation, proportionality in information disclosure and regulatory consistency.

This newly published standard provides a structured framework for age verification, age estimation and age inferences which are commonly used within age assurance systems. It is designed to enable age-related eligibility decisions without mandating specific technologies or age thresholds, and takes into account key characteristics such as functionality, performance, privacy, security and acceptability.

ISO/IEC 27566-1 supports the prevention of children's access to harmful content by enabling enhanced protection where children are the likely audience. It allows for risk-based and proportionate approaches such as a layered or step up age checks in alignment with the level of content risk. The standard embeds privacy by design and data minimisation (reducing unnecessary collection of personal data). Furthermore, the approaches allow proof of age or age range without identity disclosure where appropriate. The standard aligns well with the OSA's outcomes-based regulatory approach, by offering common technical and governance benchmarks against which age assurance solutions can be assessed while supporting risk assessments rather than prescriptive rules.

Building on the publication of ISO/IEC 27566-1, the UK continues to lead the development of the remaining parts of the Age Assurance Systems series. ISO/IEC 27566-2, which focuses on technical approaches and guidance for implementation, and ISO/IEC 27566-3, which addresses approaches to analysis and comparison, are currently in development. These standards are expected to progress through public enquiry during 2026, with publication anticipated in late 2026 and early 2027. Together, they will support consistent implementation and regulatory confidence in age assurance approaches used by online services.

In parallel, BSI is engaged in early-stage European standards development on age-appropriate design through CEN/CENELEC JTC 13. This work focuses on establishing processes for the design of digital services that are appropriate for children, taking account of data protection and

⁴ https://www.oecd.org/en/publications/age-assurance-practices-of-50-online-services-used-by-children_a19853ab-en.html



cybersecurity considerations. The activity supports broader international efforts to improve the protection of minors online and complement's outcomes-based regulatory approaches.

BSI are currently involved in several discussions and initiatives around the importance of online safety, including the need for a standard focused on AI literacy. It is critical that all users of AI systems (whether active or passive) are empowered with the knowledge and skills required to utilize them effectively. An AI literacy standard could offer clear guidance on the minimum level of information a user requires to become aware that they are collaborating with AI. Such a standard would also provide a framework for common language, responsibilities, skills development, ongoing communication, and contestability. The Confederation of British Industry (CBI) recently published a report on '[Building an AI Ready Workforce](#)' where they recognize the need for standards to support AI literacy across industry.

BSI has been working closely with Ofcom on Online Safety, Age Assurance and the challenges of human-AI interaction, in particular chatbot safety, and the need for an AI literacy standard to better support users. We would welcome further discussions to build on these engagements to help support Ofcom's plan of work 2026-2027.

Consumer protection

Consumers are key stakeholders in the development of standards. BSI's open, consensus-based standards process ensures that their views are taken into account alongside those of industry and other stakeholders.

The Consumer & Public Interest Network (CPIN) represents the consumer voice in British Standards. Funded by BSI, with additional support from DBT, CPIN members are volunteers with a diverse range of backgrounds, trained as consumer experts. CPIN provides an independent consumer voice in national standards work, as well as in European and international committees, through CPIN Representatives acting as working group experts and as members of UK delegations. The CPIN Chair represents the UK at ANEC, the consumer voice in European standards.

The BSI Consumer Forum brings together key UK consumer protection organizations, surfacing consumer interests and priorities across regions to inform standardization needs and build stakeholder input in BSI. At an international level, the Consumer Forum and CPIN Chairs work with BSI Consumer Policy to ensure a strong UK voice at the International Organization for Standardization's Committee on Consumer Policy (ISO COPOLCO).

There are good practice examples of regulators using standards to improve outcomes for consumers. For example, **BS ISO 22458 Consumer vulnerability – requirements and guidelines for the design and delivery of inclusive service**, which replaced BS 18477 in 2022, is a standard that has promoted inclusivity since 2010. Regulators, particularly in essential services such as water and energy, have advocated for the use of this voluntary international standard. The standard provides guidance for organizations, helping them to design and deliver fair, flexible, and inclusive services, which can reduce risks and improve positive outcomes for consumers in vulnerable situations.



We would also like to draw Ofcom's attention to the upcoming publication of **BS ISO 21800 – Guidance for organizations to increase consumer understanding of online terms and conditions**. The proposal for this international standard was informed by the UK Government guide on consumer understanding of online terms and conditions, and developed by BSI Consumer Policy and consumer group CPIN, with support from BSI.

The standard assists organizations to design terms and conditions in a way that encourages consumers to open and read them, thus protecting consumers from harm and reducing the risk of reputational damage for businesses as a result of poor consumer understanding of terms and conditions. It can be used by regulatory and enforcement agencies to assist in the monitoring of regulatory compliance.

Consumer impact of AI

As AI is rapidly integrated into mainstream society, new innovations promise transformative opportunities, but they also raise concerns about threats and risk of harm. Standards have a strong potential to form part of the consumer protection toolkit.

CPIN has developed an AI position paper on how to build stronger AI standards for consumers. CPIN's paper outlines how evidence-based consumer frameworks can be used to identify and include consumer interests in standards development, and the important role that consumer-focused AI standards can play in complementing legislation and regulation to deliver positive outcomes for society.

Importantly, the paper identifies five priority goals for AI (summarised in annex I), based on a review of research and literature about consumer harms and risks. The CPIN AI Position Paper is available to download for free (as full text and as a summary):

communities.bsigroup.com/consumers/cpin-ai-consumer-standards/.

BSI Consumer Policy will be holding a consumer stakeholder workshop in April to further discuss the opportunities and risks of AI, and to gather feedback from a wide range of consumer protection organizations – including members of the BSI Consumer Forum – on the development of a principled based horizontal standard focused on consumer protection in AI. We would welcome Ofcom participant if of interest.

There are other AI standards in ISO/IEC such as **ISO/IEC 23894 AI Risk Management** which helps organizations systematically identify, assess and mitigate consumer harms associated with AI, including bias, unfair treatment, lack of transparency, privacy intrusion and security risks across the AI lifecycle. Other complementary standards include **ISO/IEC 42005 AI Impact assessment** and **ISO/IEC 38507 on organizational governance of AI use** to support early identification of risks to vulnerable consumers whilst fostering senior-level accountability for AI enabled services. Together with the aforementioned ISO/IEC 42001, these standards translate outcomes-based regulatory expectations into implementable practice that supports human feedback and flexibly shaping organizational processes to meet technical and governance benchmarks while strengthening consumer trust in AI-enabled markets.



Further Information

BSI would be pleased to provide further information or to discuss the content of this submission with Ofcom. For further information please contact:

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Annex I

CPIN AI Position Paper – five priority goals

1. Consumer focus

As more AI products come online, consumers must increasingly use complex and unfamiliar technology. Consumers want their needs to be top of mind in AI development, to know that thorough testing has been done before tools reach the market, and that potential unintended consequences have been addressed.

How standards can contribute: By defining good practice for organizations to identify and minimise the risk of consumer harms in AI systems, reassuring end users that systems are as risk free as possible.

2. Fair and responsible inputs

AI models and systems are trained using large datasets to generate predictions, make decisions or produce outputs. Consumers express concern that datasets that could contain inaccurate or biased information, as these might generate outputs or decisions that perpetuate social biases, discrimination and exclusion. They also worry that sensitive data collected by AI systems might be used against them.

How standards can contribute: By defining good practice for organizations, to give consumers confidence that they have control over when and how their data is collected and used in AI models and systems, and that the datasets are of a high quality and as free from bias as possible.

3. Fair and responsible process

Fair and responsible data processing is about systems that process the datasets behind AI services. If these systems assign disproportionate weight to variables, such as race or location, it can lead to unreliable outputs. Consumers want to trust that all steps have been taken to minimise the likelihood of a biased, inaccurate or discriminatory output, and if one occurs that it can be easily challenged and rectified.

How standards can contribute: By defining good practice for organizations that gives consumers easy access to explanations of how decisions have been made and mechanisms to review and contest them.

4. Fair and responsible use

AI is applied to an increasingly wide range of tasks across all areas of consumer markets. This widespread integration may leave individuals with no choice but to engage with AI systems that could drive them towards decisions that are not in their best interests or exploit their vulnerabilities – intentionally or not. Some of these unfair or irresponsible uses are unlawful. Others may fall into a legal grey area, but they are often a result of organizations putting commercial interests or experimentation over consumer interests.

How standards can contribute: By defining levels of transparency and explainability from systems, to help consumers make sense of their interactions and treatment and judge if they think it is fair and reasonable.

5. Accountability



Trustworthy AI must be backed by strong accountability. Without this, consumers and their representatives cannot challenge, remedy or get redress for problems. This is made more difficult with AI systems that involve a long supply chain, including developers, vendors, data contributors and end users.

How standards can contribute: By defining good accountability practice and processes for organizations so that consumers have clear and easily accessible options for getting problems and harms put right.