

Ofcom Plan of Work 2026/27

CAS Response to Ofcom Consultation, February 2026

The Citizens Advice network in Scotland plays a crucial role in supporting people across the country to realise their rights. We inform people of their rights and responsibilities and provide holistic, person-centred advice – including advice on social security, debt, energy, housing, employment, family and relationships, scams, complaints processes and legal proceedings. We empower people to secure access to justice by supporting them to navigate systems and procedures to resolve their issues, prevent detriment, and pursue recourse when things go wrong.

The network provides advice via multiple channels: in person in over 300 locations across the country, as well as by phone, email, and other channels, and via our freely accessible online advice pages.

Our holistic advice and support changes lives. In 2024/25, we supported nearly 200,000 people, leading to £169.4 million back into the pockets of people who need it most. Many of the people we support are from the most marginalised and intersectionally disadvantaged communities and backgrounds in Scotland. Last year

- almost two thirds of people we supported reported having a disability or long-term health condition,
- more than half were women,
- one third resided in the most deprived areas in Scotland,
- and more than 1 in 10 identified as belonging to a minoritised ethnic group.

More people have been coming through our doors for help each year since the pandemic – and the cost-of-living crisis shows no sign of relenting. Just as the volume of need is increasing, so is the complexity. Across the last five years, we have seen one in seven people accessing our advice across multiple years.

CAS welcomes this opportunity to respond to Ofcom’s proposed plan of work. In the past year CAS has worked closely with colleagues throughout Ofcom and the telecoms industry to assist in the delivery of positive outcomes for consumers of telecommunication services. Overall, CAS welcomes the consumer outcomes prioritised in this workplan, and CAS remains well placed to support Ofcom on delivering these outcomes, through the in-depth consumer evidence and insights generated from across Scotland’s Citizens Advice Network.

CAS comments

Citizens Advice Scotland would like to once again congratulate Ofcom on the delivery of their work undertaken from 2025 to 2026. CAS colleagues have greatly appreciated the support shown by Ofcom colleagues in achieving our shared objectives, whether that be for people in Scotland or within the United Kingdom as a whole. CAS looks forward to another

year of working alongside Ofcom to deliver positive outcomes for people throughout Scotland and the United Kingdom.

We would particularly like to congratulate Ofcom on the following:

- More than 250,000 residences in Scotland can now access Full-Fibre broadband
- More than 1.6 million people throughout the United Kingdom have switched their landline or broadband provider after only one year from Ofcom's launch of the One Touch System.
- Ofcom's active and swift enforcement action when providers have failed to provide customers with clear and simple contract information before signing up to a new deal and when providers have failed to protect vulnerable customers in relation to the migration to digital landlines.

Internet and Post we can rely on

CAS supports Ofcom's proposed work to improve the reliability of internet and connectivity in the UK. CAS notes the importance of reliable infrastructure in supporting digital inclusion, especially in Scotland's rural and island communities where connectivity can be inconsistent and unreliable. CAS has advocated for improvements in this area as evidence from our network highlights the detrimental effects of poor connectivity and therefore we supports Ofcom's work in this area to improve the situation. As part of this, CAS also supports the continued development of Ofcom's Map Your Mobile, which our network has received positively and clients have found beneficial.

CAS also supports Ofcom's proposed work to tackle scam calls and texts. Evidence from our network highlights the range of harms that can be caused by scams, both financially and emotionally. CAS has responded to Ofcom's consultation on this issue and offer our support in this work.

CAS is also in support of Ofcom's intent to further understand the consumer impact of AI in telecoms. Over the past year CAS has worked with Ofcom on this matter when cases have emerged from our network of clients experiencing harms as a direct result of AI usage by their telecoms provider. With the increasing prevalence of AI across multiple industries, it is likely that we will also see increased use of this technology by telecoms companies in the near future, and it is crucial that we ensure this is fit for purpose and does not negatively impact consumers. CAS will continue to engage with Ofcom on this matter and offer our support to Ofcom in their exploration of this issue.

Our Approach to AI in Sectors

CAS supports Ofcom's call to work to better understand the developments in AI and the impact it may have on regulated sectors. CAS has already identified potential issues arising in the telecoms space due to AI usage, with customer harms being driven by use of AI chatbots rather than live call handlers. CAS also notes the potential AI has to increase the

harms caused by scams, with generative AI being utilised to make a scam seem more legitimate which may in turn cause more consumers to be taken in by it.

Furthermore, for advice organisations like our network, AI generated summaries of our advice content can cause a substantial reputational risk if AI misinterprets the information. As a result, CAS supports the continuation of Ofcom's work on online safety as it relates to AI and is in agreement that the risks it poses regarding fraud and the telecoms customer journey need to be considered. CAS is working to understand the impact AI is having on our clients but also on ourselves as an organisation and will support Ofcom's efforts with our evidence base.

With AI evolving at such a rapid pace, CAS would also call for regulation around AI by Ofcom. With the wide range of applications but also risks that AI poses, it is important that AI is a properly regulated and monitored sector. This would reduce the risk of AI misuse or poorly tested AI systems driving consumer harms and would also ensure that appropriate enforcement mechanisms would be in place should it be found that a company has used AI in a way that has caused consumer detriment. CAS feels that with the rapid growth of AI, and no signs of this slowing down, it is crucial that proper regulation of AI is implemented to protect consumers across the UK.

Scotland

CAS welcomes Ofcom's proposed work to deliver positive outcomes for consumers in Scotland. CAS strongly appreciates our engagement with colleagues within the Ofcom Scotland team and look forward to continuing to work with them in 2026/27. We welcome Ofcom's understanding of the unique geography of Scottish communities and the impact this has on the networks they utilise. CAS has raised concerns around connectivity issues in our remote rural and island communities and appreciate Ofcom's commitment to continuing to work to fill the connectivity gap in these areas.