

Question	Your response
<p><b>Question 1:</b> Do you have any comments on Ofcom's proposed Work Plan for 2026/27?</p>	<p><b>OVERVIEW</b></p> <p><u>Good Things Foundation</u> is the UK's leading digital inclusion charity. We run the <u>National Digital Inclusion Network</u> (comprising over 8,000 diverse hyperlocal organisations from libraries, GP surgeries to commercial highstreet stores) providing free digital inclusion support to the communities and customers they serve. This includes:</p> <ul style="list-style-type: none"> <li>• The <u>National Databank</u>, providing free mobile connectivity data;</li> <li>• The <u>National Device Bank</u>, supplying free, refurbished devices to people in need;</li> <li>• <u>Learn My Way</u> and the <u>AI Gateway</u>, our free and interactive basic digital skills and AI literacy platforms, which are supporting thousands of adults online.</li> </ul> <p>Good Things Foundation is also part of the <u>Minimum Digital Living Standard (MDLS)</u> project, which is working to establish a nationally agreed benchmark for what 'good' looks like for households living in the digital age.</p> <p>We work with our Strategic Partners - VodafoneThree, Virgin Media O2, Nominet, and Accenture UK&amp;I - to ensure everyone can participate in a digital society, now and in the future.</p> <p>Given our expertise, we welcome the opportunity to respond to Ofcom's Plan of Work - encouraging the UK regulator to bake in digital inclusion, making communications work for everyone.</p> <p><b>CONSULTATION RESPONSE</b></p> <p><b><u>Internet and post we can rely on</u></b></p> <p>Ofcom's outcomes focus on quality, security and resilient connectivity networks and services, as well as consumer fairness - regardless of individuals' background or circumstance - are encouraging. For consumers and communities across all four corners of the UK, achieving these outcomes will result in a reliable internet. Below are a list of project recommendations whereby digital inclusion can be baked in.</p> <p><b>Key projects and recommendations</b></p> <p><i>Mobile Connectivity:</i> Good Things are glad to see the programme of work promoting improvements in mobile connectivity continuing - especially additional</p>
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cross-sectoral partnership working to deliver in areas where the market are not readily delivering (such as rural and/or remote areas, areas of high deprivation whereby accommodation types create barriers to connectivity for residents, etc.). We recommend -

- Integrating a stronger 'affordability' component into the programme of work, as 1.6 million households with a mobile phone found it difficult to afford their services, resulting in increasing reliance on services like our [National Databank](#) - providing free mobile data in the form of SIMs to digital excluded communities through VodafoneThree and Virgin Media O2.

*Telecoms Access Review Implementation:* March 2026 is an opportunity to be seized for Ofcom's new regulatory framework to ensure the UK's broadband infrastructure is fit for the future. Good Things recommend -

- Targeting digital excluded population groups and ensuring infrastructure is appropriate for their geographical situation, including though not limited to:
  - People living on low/no income, living in temporary accommodation, experiencing homelessness, families experiencing child poverty;
  - People in remote areas - including experiencing compounded rural disadvantage;
  - People relying on digital inclusion support in an emergency such as refugee, asylum seeking, migrant groups with no or low English.<sup>1</sup>

*Tackling scam calls and texts:* Good Things encourage Ofcom's potential refreshed approach to tackling fraud and scams across all communications services considering the volume of fraud and scams that originate online. Risks originate from the design of technology platforms themselves and are being amplified by the availability of AI tools used by 'bad' actors as well as extensions of existing social practices and contexts which result in some population groups (such as those experiencing digital exclusion) being more vulnerable to fraudulent behaviour than others. Appropriate guardrails and enforcement can build confidence, shift attitudes and increase usage, and sustain digital engagement.<sup>2</sup>

*Migration from legacy services:* We are glad to see continued work with industry and the UK Government to ensure that customers are supported and protected through transitions such as PSTN. We recommend -

- Seizing the migration to bake in digital inclusion; enabling the transition to act as a critical change moment for shifting the dial and galvanising around

<sup>1</sup>

See also: UK Government (2025) [Dept. Science, Innovation and Technology's Call for Evidence Summary of Responses](#), q. 2. 2.1. <sup>2</sup>

See: Whelan (2025) [Confidence, Attitudes and Digital Inclusion in the UK - An Exploratory Study](#)

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other key transitions such as the potential shift to Internet Protocol Television.

- Enhancing existing initiatives that support vulnerable customers by holding power to account - such as the [Charter](#) signed by multiple telcos and led by the UK Government to ensure vulnerable communities are considered in the PSTN migration.

*Connected Nations*: A robust evidence-base is vital to deliver communications that work for everyone, and we encourage continued reporting on coverage, take-up, usage, and availability of connectivity networks across the UK. The [Indicators of Digital Inclusion](#) (IDIs) are an increasingly popular mechanism to help understand the need and to allow providers to respond at point of need to their customers.

They can be used in many different ways such as:

- Integrating the IDIs into Connected Nations and other research, supporting a consistent understanding of how digital exclusion impacts consumers and the UK population as a whole.
- Encouraging providers to use the IDIs in customer-facing arenas - such as call centres and front line delivery - to determine the wrap-around support they may need for transitions now and in the future.

#### **Other recommendations**

Beyond the above, our [Data Poverty Lab](#) continues to explore the sustainable innovations that can eradicate data poverty. Our most recent research investigated the scaling of solutions such as free mobile SIMs, social tariffs, free public / place-based WiFi, and zero rating - concluding that a range of innovations (a 'silver buckshot' rather than silver bullet) are necessary to ensure those living on a low/no income can get and stay connected.<sup>3</sup> The report suggests several interventions, including - alongside the UK Government - that the regulator conduct a feasibility study into a 'Connected Homes Discount' voucher (or similar) which eligible households could use with the internet service provider and package of their choice, and/or commission a feasibility study and convene a 'regulatory sandbox' with commercial providers and others to explore pros and cons of mandating a 'basic' broadband contract for any customer (as opposed to a patchwork market of social tariffs).<sup>4</sup>

#### **Media we trust and value**

Outcomes that centre diverse viewing experiences - especially public service media, in turn protecting the UK epistemic security and our threatened information supply

<sup>3</sup>

Good Things Foundation's What Works? Co-Lab (2025) Data Poverty Lab - [Tackling data poverty: Innovation and collaboration](#) <sup>4</sup>

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chain - as well as protecting audiences from harm, are vital for everyone to participate in our digital society.

Below is Good Things' list of project recommendations.

**Key projects and recommendations**

*Video on Demand Regulation:* We welcome a consultation on accessibility and standards codes which will apply to VoD services. We recommend -

- Accessibility codes embed media literacy and safety-by-design principles so VoD services serve their audiences ethically, inclusively, and with their viewing experiences - rather than commercial interests - in mind. For example:
  - Using simple, straightforward language in data management and protection policies, such as Privacy statements and Terms and Conditions, so that audiences are more easily able to navigate their platforms and make informed choices;
  - Using a simple and consistent universal approach to cookie control. A standardised approach would help people recognise the options instantly, build familiarity over time, and make informed choices about the use of their online personal data.

*Future of TV Distribution:* As stakeholders on the Dept. Culture, Media and Sport's Future of TV Distribution Forum, we welcome Ofcom's continued support to the Government as it considers its 2034 decision. We recommend -

- Ofcom investigating a full transition to Internet Protocol Television (IPTV) through a digital inclusion, future-focused lens:
  - A 'critical change moment' for increased skills and confidence, and affordable and available connectivity and kit for digitally excluded audiences - involving cross-departmental government initiative and investment, alongside the TV sector and telecoms industry;
  - The cost of a fully planned, funded, communicated, and supported IPTV transition (with a Help Scheme and targeted internet connectivity etc.) vs. continued hybrid distribution and improved Digital Terrestrial Television, resulting in disruption now and later in the 2030s.

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	<p><b><u>We live a safer life online</u></b></p> <p>We welcome Ofcom's long-term online safety goals, championing safety-by-design principles, increased user choice, and greater transparency in how platforms and services keep users safe.</p> <p>Recommendations for some aspects of Ofcom's programme of work are below.</p> <p><b>Key projects and recommendations</b></p> <p><i>More transparency in how platforms keep users safe:</i> Good Things encourages Ofcom's measures to necessitate categorised services to publish transparency reports, with Category 1 publishing summaries of their risk assessments in due course. Building on this, we recommend -</p> <ul style="list-style-type: none"> <li>• Transparency documentation and requirements are made available for platform and services users to access. Reports and assessments should be written in straightforward, plain English, be made available in other languages, as well as available to users and audiences easily, and accessible. Guidance should also be provided on what each requirement means and how a user/audience member may want to consider their personal risks.</li> </ul> <p><i>Safer experiences for children:</i> The <a href="#">Minimum Digital Living Standard</a> highlights the importance of safety for all households and ensures that households continue to build their skills to keep up to date, and provide holistic support to one another in the home. Building on this we recommend:</p> <ul style="list-style-type: none"> <li>• The skills of parents and carers that ensure appropriate protections are in place are considered as part of the plans, and that children are supported to safely engage with the online world through these 'trustworthy' adults. Building media literacy and confidence are the first steps for both adults and children, yet ensuring these skills can be transferred to everyday life and exhibited in parental and carer roles will ensure that children become well-equipped.</li> </ul>

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	<p><i>Working with civil societies and other partners:</i> It is hopeful that increased engagement with civil society and people with lived experience is critical for Ofcom. We recommend -</p> <ul style="list-style-type: none"> <li>Engaging with the <a href="#">National Digital Inclusion Network</a> regarding online safety and improving online lives. There are over 8,000 hyperlocal digital inclusion hubs that make up the Network, and the model underpins and supports other digital inclusion initiatives - in communities, local authority areas, regions, and nationally. Good Things coordinates the free to join, free to use Network, made up of local charities, community organisations, social enterprises, libraries, and many others. Digital inclusion hubs can reach into the corners of their communities and often deliver free, in person support. Offering opportunities to these ‘trusted faces in local places’ could help shape Ofcom’s work.</li> </ul> <p><i>Evaluating the impact:</i> Robust monitoring and evaluation is crucial for improved communication services that keep users and audiences safe from harm. We recommend -</p> <ul style="list-style-type: none"> <li>The continued approach by Ofcom to deploy consistent evaluation approaches - allowing organisations to more simply monitor their work, and for users and audiences to process the impact results.</li> <li>Monitoring the progress being made against Ofcom’s Plan of Work and holding platforms, providers, and other services to account using this data - helping determine success.</li> <li>Celebrating best practice and highlighting where there is room for development, to drive change across the sector.</li> </ul> <p><b>Other recommendations</b></p> <p>Good Things Foundation knows the indisputable importance of improved media literacy, and continues to engage with Ofcom’s Making Sense of Media initiative and supporting the regulator’s interventions. We recognise that everyone has a role to play in improving UK media literacy - from platform and service designers following safety-by-design and accessibility principles, through to literacy initiatives (such as Good Things’ <a href="#">AI Gateway</a>) that inform and empower users and audiences in the AI-enabled, digital world. We recommend that Ofcom take a more active role in helping wider understanding of media literacy, and the importance of it. Raising awareness of media literacy - through collaborating on campaigns such as Good Things’ annual Get Online Week - would result in effective promotion, stronger engagement across communities, and would ensure that people of all ages and backgrounds are equipped with the skills, confidence, and critical thinking needed to navigate the digital and media landscape safely and effectively.</p>
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**Supporting our mission**

Good Things' National Digital Inclusion Network operates nationwide, and we see firsthand the value and importance of working in each corner of the UK to ensure universal digital inclusion. As a result we welcome Ofcom's continued efforts across the Nations, especially in ensuring media literacy ahead of the Local and Regional Elections in May 2026.

Additionally, as before, our Learn My Way platform launched Ofcom-supported topics on digital wellbeing and safety last year. This impactful collaboration has progressed our media literacy agenda and we welcome continued partnership in this regard.

As we enter into our new strategy period, Good Things are also keeping - more strategically - abreast with emerging technologies and service transformations in the AI-enabled world. We would welcome continued partnerships with Ofcom to make our joint efforts in this regard especially impactful.

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