

Ofcom's Plan of Work 2026/27 – Skyscanner's response

5 February 2026

Introduction

- Skyscanner welcomes the opportunity to comment on Ofcom's Plan of Work 2026/27.
- Our comments will be limited to Ofcom's plans in relation to the implementation of the Online Safety Act (OSA).

About Skyscanner

- Skyscanner is a UK-founded and -headquartered travel metasearch service (referred to as a vertical search service under the OSA). We help consumers to find and compare travel offers from over 1,200 airline, hotel, car rental and online travel agency partners.
- We are in-scope of the OSA as a search service. However, we are an inherently low risk service – we source our travel content from commercial partners, we have incredibly limited search features and functionalities, do not transact with users, and have no user-to-user functionalities.
- Ofcom has acknowledged the 'materially lower level of risk of harm' posed by vertical search services in its Register of Risks, and reflected this in several ways (such as by exempting these services from the categorisation process).

Ofcom's online safety priorities for 2026/27

- We agree with the overarching objective of protecting all users from illegal content online, and children from the most harmful material.
- We also welcome the focus on ensuring compliance with the duties now in force and monitoring their impact. In-scope services have only been required to comply with the Act's risk assessment, illegal content and child protection duties for just over a year, and it is right that the regulator prioritises compliance with these and considers their effectiveness before pursuing further iterations of these duties.
- It is encouraging to see Ofcom planning to focus in particular on social media services, adult sites, and those services that are most used by children. This clear prioritisation of the riskiest services is, in our view, essential for Ofcom to effectively balance its online safety and economic growth duties.

- Ofcom has, for the most part, sought to ensure that duties are proportionate to the level of risk presented by the service, which is to be commended. We would continue to ask Ofcom to ensure that, through the ongoing additional safety measures process and any further iterations, it maintains its commitment to proportionality and only imposes additional safety measures on services where there is clear evidence of harm.
- It is also important that Ofcom and the Government consider the impact of ongoing additions to the list of priority illegal harms. Requiring all in-scope services to assess the risk of an ever-growing list of such harms is disproportionate for inherently low risk firms with a negligible risk of harm from the types of content being regulated.
- For low-risk firms, the risk assessment process is the most time-consuming aspect of compliance. It risks becoming even more of an opportunity cost for low-risk firms if they are potentially required to conduct ever-longer risk assessments every time they wish to introduce a significant new product feature or during their annual reviews.
- That is why we believe Ofcom should prioritise introducing a streamlined risk assessment process for safe and responsible firms (see below).

Ofcom should better reflect the importance of the Growth Duty in its online safety priorities

- The Secretary of State for Science, Innovation and Technology told the Science, Innovation and Technology Committee on 3 December 2025 that her number one priority is growth.
- While we welcome Ofcom's efforts to introduce proportionality into the online safety regime so far, we believe there are areas where the regulator could go further to reduce the regulatory burden of the OSA on low-risk firms and thus better align its approach with the Government's growth agenda.

Fees

- We note that, as per the Plan of Work, Ofcom expects to finalise the implementation of the fees regime this year, including the recouping of Ofcom's costs to date.
- As we have previously outlined, we believe Ofcom's decision on fees is unfair and disproportionate.
- Ofcom's proposed approach of relying purely on Qualifying Worldwide Revenue (QWR) to determine liability to pay, without any consideration of additional

factors such as risk, will lead to many safe and responsible businesses – which were never the intended target of the OSA - having to pay fees.

- This undermines the Government’s drive for economic growth by imposing an additional cost on businesses for operating in the UK market that is completely untethered from any assessment of how much resource Ofcom will have to dedicate to regulating the fee payer.
- It remains unclear why Ofcom believes it would not be possible to introduce risk as a consideration to the fees regime. Indeed, Ofcom has designed the broader OSA regime to impose greater obligations on certain categories of service (or those with certain features and functionalities) that are more closely correlated with greater risk of harm.
- It is disappointing that there is no commitment in the Plan of Work to explore additional mitigations to better target the fees regime, as requested by the Secretary of State for Science, Innovation and Technology.
- Indeed, [the Secretary of State has encouraged Ofcom](#) to prioritise work to consider exemptions for certain sectors, including vertical search services, as part of the implementation of the fees regime. Such an exemption would be in line with Ofcom’s findings elsewhere, including in the Register of Risks, the Illegal Content Codes of Practice, and the categorisation process.
- We would welcome a recognition in the Plan of Work that Ofcom plans to pursue this work as part of its implementation of the fees regime this year, including planned timelines. This would give confidence to firms that a more proportionate approach to fees will be introduced.

Risk assessment process

- As part of its work this year on risk assessments, we believe that Ofcom should introduce a streamlined risk assessment template for low-risk businesses. The Act requires in-scope services to conduct ‘suitable and sufficient’ risk assessments, but what is suitable and sufficient will naturally vary by service type and risk.
- The current risk assessment process is incredibly time consuming and duplicative for those services that pose a ‘negligible’ risk of harm due to the very limited features and functionalities of their service.
- A simplified process for such services would free up resource and allow them to focus on innovating and growing, without undermining user safety (since such services already pose a low risk).

- Similarly, there is no requirement in the Act for all services to review their risk assessments annually. What constitutes ‘appropriate steps’ to keep risk assessments up to date will vary by business. Services whose risk profile is ‘negligible’ or ‘low’ due to their business model, characteristics and features and functionalities, should only be required to review and update their risk assessments when making any changes to their service that would change the factors listed here (as already required separately by the Act).
- We believe these small changes to the risk assessment process would make a big difference to low-risk firms and allow Ofcom to simultaneously support growth and improve online safety, by ensuring that compliance burdens better reflect risk.

Scope

- As the Government undertakes work to review the scope of the OSA, we believe it is important for Ofcom to support that work so that only those services that pose a real risk of harm are regulated under the Act.
- Ofcom should use the wealth of evidence it has amassed regarding online harms to give periodic recommendations to the Government regarding categories of service that should either be added to the scope of the Act or that should be removed, due to their inherently low risk nature and limited functionalities.
- A more focussed regime would better enable Ofcom to meet its online safety objectives while supporting the Government’s ambition to reduce unnecessary regulatory burdens on businesses.
- We would therefore welcome the inclusion of a periodic scoping exercise within Ofcom’s Plan of Work for 2026/27.