

Ofcom's Proposed Plan of Work 2026/27

Introduction to the Trust Alliance Group

Trust Alliance Group (TAG) was established in 2002 and runs a range of discrete national Alternative Dispute Resolution (ADR) schemes across different sectors, including Communications Ombudsman, approved by Ofcom, and the Ofgem-approved Energy Ombudsman. TAG also acquired The Internet Commission in 2022 which promotes ethical business practice, to counter online harms and increase platform accountability.

Online Responsibility Network (ORN), established in 2025, aims to be the leading independent network for companies to collaborate, share and apply best practices in online trust and safety. As part of TAG, it has 24 years of experience with regulators such as Ofcom and Ofgem and can equip members to navigate the evolving digital landscape in line with the Online Safety Act and Digital Services Act.

Communications Ombudsman provides independent dispute resolution services, whilst helping providers understand their consumers and improve their experience. With over 1,400 telecommunications companies signed up to our scheme – and over 24 years' experience in the communications sector – we are one of the ADR schemes approved by Ofcom to impartially and independently handle disputes between consumers and providers. Using our insight, we continue to help providers improve their customer service.

Our Response

Online Safety

Following an intense period of implementing the online safety regime, **Online Responsibility Network (ORN)** welcomes Ofcom's commitment to ensuring that categorised services move beyond initial compliance steps and towards delivering meaningful, measurable improvements for users. We are also pleased to note Ofcom's intention to "monitor whether life is getting safer online", and to draw on insight and intelligence from relevant stakeholders to support this work.

ORN exists to enable its diverse membership to go beyond compliance, adopt principles-based trust and safety frameworks, and collaborate to deliver tangible online safety outcomes for service users. As the network develops, we would welcome the opportunity to share insight, evidence and practitioner perspectives with Ofcom, to support its assessment of what is working well in practice and assess where further clarity, support or action may be needed.

We also believe ORN can assist in identifying barriers that organisations encounter when translating regulatory expectations into operational reality – particularly for small and medium-sized services, which may lack the capacity or capability to respond at pace to evolving regulatory and technological standards.

We welcome Ofcom's plan to finalise the categorisation register ahead of a consultation on additional duties – including those relating to fraudulent advertising, terms of service, user empowerment, ID verification, and content-related protections. The Online Responsibility Network will be happy to contribute supporting evidence and practical insight to these consultations as they are brought forward.

While the UK is, in many ways, a leader in online safety regulation, we support Ofcom's approach to studying and learning from global developments – through collaboration with Australia's eSafety Commissioner, Ireland's Comisiún na Meán, Singapore's IMDA, and the European Commission. ORN enjoys close relationships with many of these agencies and our membership will include a number of commercial organisations who must navigate and comply with regulations across multiple online safety jurisdictions. ORN will be pleased to share our own evidence and perspectives on these issues, to support the development of an even more effective online safety regime and to identify opportunities for regulatory alignment, where it makes sense to pursue this.

Telecommunications

Communications Ombudsman supports the plan of work, as set out – particularly in relation to areas affecting consumers and providers of mobile, broadband, landline or pay TV products and services.

We support Ofcom's commitment to creating and maintaining an efficient sustainable telecoms market that delivers choice, value, high quality services and treats consumers fairly at every stage – regardless of their circumstances. We know that easy access to effective Alternative Dispute Resolution assists in delivering each of these objectives and we remain fully committed to playing our role in supporting consumers with unresolved complaints – while working with telecoms providers to improve their own customer and product service quality.

We welcome Ofcom's commitment to enhancing the Consumer Supervision Programme to ensure consumer protection interventions and initiatives are properly delivered and drive positive outcomes for all. As Ofcom seeks additional intelligence, evidence and insight to inform this, Communications Ombudsman will be happy to support this work in any way that is helpful.

We also welcome Ofcom's decision to review the impact of new requirements obligating providers to set out any in-contract price rises upfront in pounds and pence and the suitability of rules around contract changes. Communications Ombudsman will be pleased to provide supporting evidence to this work, and we look forward to working with Ofcom as it seeks to improve regulation, standards and guidance across an evolving telecoms market.

We think that it is important to ensure consumers have a consistent experience of redress regardless of their supplier. We are concerned that consumers are receiving different levels of redress in the Telecoms sector with the presence of an ombudsman and an ADR provider. We are supporters of a single ombudsman per sector model where there can be a holistic view of sector data, and therefore the ability to provide sector wide insights into detriment which results in improvements to the overall sector. This already exists and works well in Energy. It is interesting to note that the recent review of the water sector is also recommending a single ombudsman for that sector