

Your response

Question	Your response
<p>Question 1: Do you have any comments on Ofcom's proposed Work Plan for 2026/27?</p>	<p>Consultation response: Ofcom's proposed Plan of Work 2026/27</p> <p>Which? response to the Ofcom consultation on the proposed Plan Of Work 2026/27</p> <p>Submission date: 05/02/2026</p> <p>Summary</p> <p>This document is a response to Ofcom's consultation on the 2026/27 work-plan. Our response is focussed on Ofcom's priorities relating to 'internet and post that we can rely on' and 'we live a safer life online'.</p> <p>In relation to the priority area 'internet and post that we can rely on,' we recommend:</p> <ul style="list-style-type: none"> • In-contract price rises: Ofcom should urgently update the general conditions to state that the only permissible reason for providers to apply a discretionary price increase during a customer's minimum term is for changes imposed by law (e.g. changes in VAT). • Customer migration from legacy services: We encourage Ofcom to work with Government and providers to develop a consistent and fair approach to informing and engaging with customers who are unresponsive during service migration processes. • Telecoms Access Review Implementation: As Ofcom prepares to publish the outcome of the TAR 2026-31, it is critical that the response includes robust measures to protect consumers as copper internet services are decommissioned. It is also essential that service continuity is protected for customers in the event that a network provider enters into administration. • Tackling Scam calls and texts: Ofcom should propose duties for Online Communications Services which are similar to those which have been proposed for telecoms providers. RCS providers must have the same obligations in relation to preventing fraud as those that apply to telecoms providers. • Mobile coverage: Ofcom should consider integrating a feature in the 'Map your Mobile' tool to indicate where a coverage prediction has been substantially validated by crowd-sourced data.

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	<ul style="list-style-type: none"> • Customer service: To ensure Ofcom has a comprehensive view of complaints across the sector, the regulator should collect complaints data directly from communications providers. • Digital Inclusion and affordability: Ofcom should resume quarterly updates on social tariff take-up and explore options to enhance reporting transparency in relation to uptake of social tariffs on a per-provider basis. • Review of Broadband Universal Service Obligation: Ofcom must urgently review the broadband USO specification to ensure that it is fit for purpose. <p>In relation to the priority area ‘We live a safer life online,’ we recommend:</p> <ul style="list-style-type: none"> • Additional safety measures: Ofcom should expand the scope of its proposed recommender system policy to include fraud content. Ofcom must maintain an objective component (e.g. number of users) when deciding whether services ought to have enhanced duties. Ofcom must ensure that the implementation of the additional measures within the illegal harms Codes of Practice are not subject to delays. • Duties on categorised services: Ofcom should expedite the publication of the register of categorised services and should expedite the publication of the final statement on fraudulent advertising duties to ensure that the fraudulent advertising duties are in place as soon as possible. • Ongoing OSA implementation: Ofcom must take decisive action in 2026/27 in relation to persistent fraudulent content, as it has done in other areas where it has found compliance failures. • Artificial intelligence: Ofcom should explore the merits of introducing specific mitigations for AI-enabled advertising fraud. • Media literacy: Ofcom should ensure that its recommendations for services to promote media literacy includes action for services to raise awareness of potentially fraudulent content among their users. <p>Priority area: Internet and Post we can rely on.</p> <p>In-contract price rises</p>

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	<p>We welcome that as part of Ofcom’s consumer supervision programme the regulator will: ‘review the impact of the changes to our rules that require providers to set out any in-contract price rises upfront in pounds and pence, and the suitability of rules on contract modifications.’</p> <p>In January 2025 Ofcom introduced rules that required communication providers to set out any in-contract price increases to the customer in pounds and pence before they entered into a contract. We noted in our February 2024 consultation response that Ofcom’s rules on contractual modifications may still allow communication providers to impose unspecified price increases on customers, so long as they allowed for customers to exit their contract, penalty free, within 30 days. Our response called for a regulatory review of these terms and for strengthening the rules on their use. At the time, Ofcom said that these terms were not in scope for review, but it is now evident that action is urgently required.</p> <p>In October 2025, O2 announced a price rise policy that risks undermining the Ofcom rules on price rise transparency. We have expressed our concerns to Ofcom and it is encouraging that Ofcom has committed to specifically review the suitability of rules on contract modifications. The October 2025 price rise by O2 appeared to use a general unilateral variation of contract clause to apply a discretionary price increase. Under Ofcom’s general conditions, condition C1 states that contractual modifications should be to the exclusive benefit of the customer; if they are not then the customer must be given 30 days notice and allowed to leave without incurring any exit charges.</p> <p>It is our view that contractual terms giving providers unlimited discretion to increase in-contract charges at any time, by any amount, represents a significant power imbalance to the detriment of consumers.</p> <p>Following O2’s price rise announcement, Which? was among the organisations advocating for customers to switch to avoid unexpected price rises. Some commentators have also suggested that giving consumers a longer period to switch, or improving the sequencing of the switching period could better help consumers to navigate the impacts of unexpected price hikes. This will not directly address the issues posed by O2’s actions. It is critical that customers have certainty about the price they will pay throughout the duration of a contract so they can accurately compare prices across the market. But a longer switching period may have the unintended consequence of legitimating the future use of unspecified price rises by providers. Providers may reasonably conclude that as long as they comply with an extended switching period they will have free reign to impose unlimited discretionary price rises on their customers at any time and for any reason.</p> <p>For these reasons, a straightforward ban on the use of discretionary price rises in telecoms contracts is the fairest and most effective mechanism to</p>

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	<p>prevent these types of pricing practices going forward. Ofcom should urgently update the general conditions to state that the only permissible reason for providers to apply a discretionary price increase during a customer's minimum term is for changes imposed by law (e.g. changes in VAT).</p> <p>Customer Migration from Legacy services</p> <p>Ofcom identifies the migration of customers from legacy networks as a priority in the 26/27 workplan. Which? remains concerned with the way migration of customers from the Public Switched Telephone Network is being done. In 2025, we highlighted the dangers posed to consumers by the ongoing sale of analogue telecare devices, which are not guaranteed to be functional in an emergency on digital landlines. There are also related needs of landline customers in relation to service resilience and service continuity. We are concerned that some landline customers in areas with poor mobile reception could face significant risks in the event of prolonged power-outages. We are keen to engage with Ofcom to understand their work in this area and the sufficiency of existing arrangements to ensure that consumers are not left without access to emergency services.</p> <p>On the sunsetting of the 2G network. Ofcom must ensure that mobile networks can proactively identify customers with older model handsets who may need support to upgrade their device to one compatible with 4G/5G networks.</p> <p>Across legacy network transitions, we are conscious that there is a specific challenge for networks and communication providers if known vulnerable customers are unresponsive to communications regarding network transitions. In addition, communication providers must have robust processes for identifying vulnerable customers, in line with the DSIT supported journeys framework. We encourage Ofcom to work with Government and providers to develop a consistent and fair approach to informing and engaging with vulnerable customers, even if they are not initially responsive.</p> <p>Telecoms Access Review Implementation</p> <p>We anticipate further detail from Ofcom as it prepares to publish the statement relating to the Telecoms Access Review 2026-31 later this year. Which? responded to the consultation on this topic in May 2025. Our response highlighted specific concerns with respect to ensuring that consumers are protected and supported through the retirement of legacy copper broadband networks. In our response, we suggested that in addition to the approach that Ofcom proposes to identify 'excluded premises' network operators and communication providers should also be required to certify that no known vulnerable consumers are unable to access an FTTP network before pricing charge controls on legacy copper products are removed. Doing so, we argue, would introduce an additional layer of accountability and oversight into the</p>

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	<p>process. We suggested that customers should have stronger rights to be notified and, if necessary, appeal an exclusion designation.</p> <p>Ensuring customer internet service continuity: In our response to the Telecoms Access Review Consultation, we also reflected concern regarding the long-term sustainability of some alt-net providers and the potential impact that network providers entering into administration could have on broadband customers. While suppliers of last resort arrangements exist for customers in energy markets, similar protections do not exist in the telecoms sector. Given the importance of reliable access to broadband networks for customers, it is imperative that Ofcom and the Office for the Telecommunications Adjudicator can provide swift and robust protection for customers in the event that a network provider enters into administration.</p> <p>Tackling scam calls and texts</p> <p>Ofcom’s proposed Plan of Work 2026/27 states that the regulator is continuing its strategy to make it difficult for scammers to use UK telecoms networks to harm consumers. Ofcom has promised to publish a statement in Q2 2026/27 on combatting scam mobile messages and has stated that it is considering how to refresh its approach to tackling fraud and scams across all services that it regulates.</p> <p>Which? welcomes this project from Ofcom. We have responded to Ofcom’s consultation on combatting mobile messaging scams, and have urged the regulator to go further in a number of areas in order to properly tackle mobile messaging scams. In particular, we have argued that Ofcom should introduce a mandatory Sender ID registry to combat fake Sender IDs. We look forward to Ofcom’s refreshed approach to tackling fraud and scams, especially in light of the government’s forthcoming fraud strategy.</p> <p>Which? believes that there must be as consistent and uniform regulation of telecoms and telecoms-adjacent services as possible when it comes to scams. Evidence suggests that Online Communications Services (e.g. WhatsApp, Signal) are responsible for a significant proportion of scam volume and value. However, these services are currently not regulated in the same way as traditional telecoms services when it comes to scams.</p> <p>According to the Payment Systems Regulator, approximately 11,000 automated push payment scams originated on WhatsApp in 2023, five percent of the overall total. These 11,000 scams accounted for £16.2 million in losses, also five percent of the overall total. This figure may grow in future without further intervention. Ofcom speculated in its call for inputs on reducing mobile messaging scams that some scammers might be shifting their tactics towards the use of Online Communications Services. Despite this, Ofcom’s illegal content Codes of Practice for user-to-user services do not contain any specific duties for Online Communications Services in relation to fraud. This stands in contrast to traditional telecoms operators, which have been the</p>

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	<p>subject of numerous Ofcom interventions, including a consultation related to blocking potential scam calls from abroad and the aforementioned consultation on combatting mobile messaging scams.</p> <p>These consultations will create substantial new anti-fraud duties for traditional telecoms operators. Which? believes that, as part of its refreshed approach to tackling fraud, Ofcom should propose duties for Online Communications Services which are similar to those which have been proposed for telecoms providers. These duties include conducting Know Your Customer checks on senders of business-to-consumer communications and conducting Know Your Traffic checks (monitoring sending patterns for unusual spikes in activity) on business-to-consumer communications.</p> <p>There is also currently regulatory uncertainty about which regime - the Online Safety Act 2023 or the Communications Act 2003 - will govern Rich Communications Services (RCS). Ofcom notes in its consultation on combatting mobile messaging scams that whether or not RCS is now, or could in future be, regulated under the Communications Act 2003 will depend on how it is implemented in the UK. RCS may also be considered a user-to-user service under the Online Safety Act. Ofcom also notes in its call for input on reducing mobile messaging scams that it is aware that scammers are using RCS to defraud consumers.</p> <p>Which? believes that the ongoing regulatory uncertainty around RCS is unhelpful. Whether RCS is regulated under the Communications Act, the Online Safety Act, or another piece of legislation entirely, we believe that RCS providers must have the same obligations in relation to preventing fraud that existing telecoms providers have, namely conducting due diligence and traffic checks on those who wish to send business-to-consumer communications.</p> <p>We are broadly supportive of the outcomes that Ofcom identifies for consumers in relation to the priority area 'internet and post we can rely on'. In this section, we respond to the activities and work programmes that Ofcom commits to undertake in this area.</p> <p>Mobile coverage</p> <p>We note that Ofcom plans to make enhancements to the 'Map your Mobile' tool. We support the work that Ofcom has undertaken to improve how this information is presented to consumers. The map your mobile tool uses prediction data from mobile networks to present consumers with information on mobile network coverage and performance. This prediction data is then validated through the use of 'real-world' crowd sourced data. Although the current tool represents an improvement on the previous 'mobile coverage checker', Ofcom acknowledges that location-specific factors may mean there are differences between MNO coverage predictions and the consumer experience of coverage on-the-ground. As such, Ofcom should consider integrating a feature in the 'Map your Mobile' tool to indicate where a coverage</p>

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	<p>prediction has been substantially validated by crowd-sourced data. Doing so would help to communicate the degree of certainty with which a coverage or performance prediction accurately reflects the real-world experience of mobile service.</p> <p>Customer service</p> <p>We note that Ofcom’s 26/27 workplan does not refer to improving customer service in the telecoms sector. Ofcom's 2025 Comparing Customer Service report indicates improved satisfaction with complaints handling in the sector, but this has not led to a reduction in the overall volume of complaints.</p> <p>Which? research finds that the broadband sector is among the worst performing sectors for customer service and that broadband customers were an estimated £94 million worse off due to poor customer service in the period May 2023 to May 2024. This figure represents customers who were £89 million worse off due to giving up speaking to their broadband provider and customers who were £6 million worse off due to not contacting their provider due to a previous bad experience.</p> <p>We believe Ofcom should enhance its public reporting of customer service data. Ofcom reports publicly on telecoms customer complaints each quarter, but these statistics only cover reports made directly to Ofcom, not those made to communication providers or approved alternative dispute resolution schemes. To ensure Ofcom has a comprehensive view of complaints across the sector the regulator should collect complaints data directly from communications providers. In addition, Ofcom's primary metric — a ratio of complaints per 100,000 subscribers — can create a misleading perception of performance, particularly for providers with smaller customer bases where a few complaints can heavily skew the ratio. To present a fairer and more complete picture, Ofcom should explore supplementary reporting methods, such as including the absolute number of complaints or tracking the percentage change over time. Ofcom should also find ways to capture the experiences of customers who don't make it through to the complaints process, for example commissioning research to track how many people give up or avoid contacting their provider altogether. Ofcom should also hold providers accountable for missing resolution opportunities. This should include requiring providers to track and report on 'abandoned' customer contacts (where people drop out before resolution), so the scale of unresolved issues is visible.</p> <p>Digital Inclusion and affordability</p> <p>Ofcom’s 26/27 workplan does not contain any reference to work that the regulator will undertake in relation to digital exclusion. This is despite the draft Statement of Strategic Priorities between the Government and Ofcom stating: “The government would encourage Ofcom to consider how they can best contribute to addressing digital exclusion, including collaboration with other regulators where appropriate.”</p>

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	<p>The work plan does refer to monitoring the affordability of services for vulnerable consumers in the context of its wider consumer supervision programme, but this is the sole reference to communication service affordability within the workplan.</p> <p>At a minimum, Ofcom should consider how it can improve transparency in relation to social tariff uptake. Previously, Ofcom reported on the percentage of eligible consumers who had signed up for a social tariff on a quarterly basis, but in recent years this has reduced to a single, year-end, update. Ofcom should resume quarterly updates and explore options to enhance reporting transparency in relation to social tariffs, such as including uptake data on a per provider basis.</p> <p>Review of broadband Universal Service Obligation</p> <p>In the annex to the 26/27 workplan Ofcom says it will engage with the UK Government on the future approach to the broadband Universal Service Obligation. However, Ofcom initially reported back in 2024 that the threshold for a review of the broadband universal service obligation had been reached. At present, a timetable for this review has yet to be announced. If customers cannot access a ‘decent’ broadband connection, the USO provides an important safeguard. Yet the rate at which the USO has been set – 10mbs download speed and 1mbs upload speed – has long been outdated considering it was last set almost a decade ago. Ofcom must urgently review the broadband USO specification to ensure that it is fit for purpose.</p> <p>Priority area: we live a safer life online</p> <p>Additional safety measures</p> <p>The proposed Plan of Work states that Ofcom intends to publish a statement on additional safety measures to improve the Online Safety Act’s illegal harms codes of practice in Q3 2026/27. Which? welcomes this commitment. Since Ofcom’s consultation on the matter closed in September 2025, we have seen more evidence of scams on online platforms, as well as evidence of poor compliance by regulated services.</p> <p>In the consultation, Ofcom proposed that regulated services would have to prevent their recommender systems from suggesting certain categories of illegal content. Fraud was not included on Ofcom’s original list. Which? argued that fraud ought to be included. Since the closure of the consultation, Which? has seen additional evidence which supports its viewpoint. A Which? investigation published in October 2025 found numerous examples of deepfake investment scams on YouTube. Some of the victims that we spoke to told us that, having been scammed on YouTube before, they are now constantly recommended scam content on YouTube by the service’s algorithm. This raises the concerning prospect of victims being constantly targeted by new scam</p>

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	<p>content and, in our view, strengthens the case for Ofcom to expand the scope of its proposed recommender system policy to include fraud content.</p> <p>Ofcom’s proposals also imposed duties on large services that were both at medium and high risk of fraud to use proactive technology to detect fraud, a proposal that Which? supports. Ofcom’s Online Safety in 2025 report, published in December 2025, found that in a sample of 104 of the largest online services, just nine rated themselves as ‘high risk’ for fraud, while a further 14 rates themselves as ‘medium risk.’ The report adds that many services provided “weak justifications for low or negligible risk level assessments.” Given this reality, Which? believes it vital that Ofcom maintains an objective component (e.g. number of users) when deciding whether services ought to have enhanced duties, since it is possible that some services have underestimated their fraud risk hitherto. If services continue to underestimate their risk, Ofcom should explore the possibility of extending enhanced fraud duties to services based solely on size.</p> <p>As a general point to conclude this section, Ofcom’s implementation of the additional duties for categorised services (more on which below) has been beset by delays. Ofcom must ensure that, to the best of its ability, the implementation of the additional measures within the illegal harms Codes of Practice are not subject to implementation delays and that the codes are implemented as soon as possible.</p> <p>Duties on categorised services</p> <p>Ofcom’s proposed Plan of Work states that the regulator has adjusted its plans in relation to categorised services following the conclusion of a legal challenge to the government’s secondary legislation on service categorisation. Ofcom will now conduct a representations process by Q1 2026/27 to allow potentially categorised services to comment on provisional decisions before finalising the register. Subject to this process, Ofcom aims to publish the final categorisation register and consult on additional duties - including those on fraudulent advertising - in Q2 2026/27, with final statements to be published by Q3 2027/28.</p> <p>Which? has publicly shared its disappointment at the further delays to the implementation of the fraudulent advertising codes of practice. We do not believe that Ofcom has adequately explained the reasons why the implementation process is scheduled to take so long. Ofcom appears to be allocating six months to conduct a representation process before finalising the register of categorised services (assuming representations wrap up in June 2026). By contrast, the European Commission conducted its representations process for the designation of Very Large Online Platforms and Very Large Online Services under the Digital Markets Act and Digital Services Act in two months.</p>

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	<p>Moreover, there continues to be a huge amount of fraudulent adverts on major online platforms. Recent reporting from Reuters has estimated that Meta generates as much as ten percent of its total global revenue - approximately \$16 billion - from fraudulent adverts. This figure is higher in certain markets; Reuters estimated that 19% of Meta's revenue in China - around \$3 billion - comes from ads for scams and other illegal content.</p> <p>Continued delays to the implementation of the fraudulent advertising codes will cause hundreds of millions - if not billions - in further losses and associated economic and social harm. The enactment impact assessment for the Online Safety Act estimates that online fraud causes £18.9 billion in economic and social damage every year. While not all of this is attributable to advertising fraud, it is clear that, in the two year period between now and the likely finalisation of the fraudulent advertising codes, the cost of the delay to the fraudulent advertising codes of practice will be extensive. Which? believes that, in light of this, Ofcom should expedite the publication of the register of categorised services if possible, and should certainly expedite the publication of the final statement on fraudulent advertising duties to ensure that the fraudulent advertising duties are in place as soon as possible.</p> <p>Ongoing OSA implementation</p> <p>In the proposed Plan of Work, Ofcom states that it will progress the third and final phase of the online safety regime's implementation and use all its powers to ensure that services do what is necessary to protect users.</p> <p>Which? welcomes Ofcom's commitment to using its powers to protect users. Since the illegal harms codes of practice became enforceable in March 2025, we have found numerous examples of possible fraud on major online platforms. In August 2025, we reported on the fact that nearly one in ten Booking.com customers surveyed by us said that they had been sent scam messages. In October 2025, we reported on deepfake investment scams on YouTube, which used fake celebrity endorsements to promote crypto scams. In December 2025, we highlighted the fact that scammers are abusing Google to target customers of telecoms and utility brands and trick them into giving away sensitive information. Moreover, Which? is not the only organisation which has spotted possible compliance issues. Ofcom's own report on online safety in 2025 found that some services had shown a disappointing level of engagement with certain fraud duties, particularly those around linking to trusted flaggers.</p> <p>Despite this, we are not aware that any services are being investigated by Ofcom in relation to their compliance with the OSA's fraud duties. This stands in contrast to other areas, such as terrorism and hate, where per Ofcom's aforementioned report, the regulator is investigating compliance issues around one particular provider and will investigate further providers in the forthcoming year. Which? is calling on Ofcom to take decisive action in</p>

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	<p>2026/27 in relation to persistent fraudulent content, as it has done in other areas where it has found compliance failures.</p> <p>Artificial intelligence (AI)</p> <p>Ofcom’s proposed Plan of Work includes a commitment to continue to monitor how AI is affecting the areas for which Ofcom is responsible. Which? has seen numerous instances of AI - especially deepfake technology - being used to perpetrate scams. In July 2025, we reported on the reemergence of a global financial scam called Quantum AI, which uses deepfake technology to impersonate celebrities and organisations to promote a fraudulent investment scheme. In February 2025, the Advertising Standards Authority published its annual scams report, finding that celebrity deepfakes were the most common scam advert reported to the regulator in 2024.</p> <p>Which? welcomes the work that Ofcom has done hitherto on this subject, particularly Ofcom’s paper on attribution tools to tackle deepfakes. As part of its ongoing work on AI, Which? is calling on Ofcom to explore the merits of introducing specific mitigations for AI enabled advertising fraud (such as labelling of synthetic content or requiring platforms to use machine learning classifiers to scan for AI-generated content) as part of its ongoing work on online safety.</p> <p>Ofcom’s proposed Plan of Work states that, in winter 2025, the regulator will publish an invitation to contribute on the impact AI could have on the experience of residential and business broadband, mobile and pay TV customers. Ofcom adds that it will continue this work in 2026/27, including with a further publication that will set out any next steps for its work in this area.</p> <p>Which?’s evidence suggests that AI is being increasingly used in telephone voice scams. We have received reports of automated voice calls, generated using AI, which claim to be a ‘local heating advisor’ or a local ‘energy advisor.’ The aim of these calls is to trick victims into consenting to speak with a human being, a scammer who subsequently attempts to induce the victim to reveal their personal and financial details. This is not an isolated incident: Which?’s roundup of the most widespread scams of 2025 found that AI phone scams were among the most common. Moreover, a January 2025 survey of 12,000 consumers across six countries commissioned by telecoms firm Hiya found that a quarter of UK consumers had received a deepfake phone call in the previous year.</p> <p>Given the evidence of the increasing use of AI to assist with fraudulent telephone calls, Which? welcomes Ofcom’s intention to further explore the impact of AI on telephone customers. We would like to place on record our interest in working further with Ofcom on this topic.</p> <p>Media literacy</p>

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	<p>Ofcom's proposed Plan of Work 2026/27 states that the regulator will continue its media literacy work via the Making Sense of Media programme. Ofcom's current Three Year Media Literacy Strategy is focused on skills to safely flourish online, online harms against women and girls, and mis- and disinformation. These are all important topics, but given the extent to which artificial intelligence is being used to perpetrate scams, Which? believes that Ofcom's media literacy work should focus not only on mis and disinformation but also on scam content. In particular, Ofcom should ensure that its final Statement of Recommendations setting out steps services of all sizes can take to promote media literacy includes steps that services can take to raise awareness of potentially fraudulent content among their users.</p>

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