

# Ofcom Plan of Work 2025/26: Summary of consultation responses

## Introduction

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We consulted on our [proposed Plan of Work 2025/26](#) between 04 December 2024 and 29 January 2025. During this time, we received 120 responses, of which 50 were identical responses from different individuals who expressed the same concerns.

The responses are from a range of stakeholders across the sectors we regulate, government bodies, consumer organisations, industry bodies and individuals. Where stakeholders gave permission, we will publish their responses on our website.

We also held four separate consultation events in Belfast, Cardiff, Edinburgh and London, allowing stakeholders to engage directly with us on our plans for the year ahead. We are grateful to all those who took the time to respond to the consultation and/or join our consultation events.

The purpose of this document is to pull out some key themes from the consultation responses we received and offer our response to them. The summaries are grouped into themes to reflect the structure of the Plan of Work:

1. [Internet and post we can rely on](#)
2. [Media we trust and value](#)
3. [We live a safer life online](#)
4. [Enabling wireless services in the UK economy](#)
5. [Cross-cutting areas and underpinning work](#)

As most policy programmes set out in the Plan of Work are subject to their own consultation process and timelines, our responses refer mostly to existing work, ongoing/upcoming consultations and published Ofcom material. In some cases, we have picked up specific points directly with stakeholders. Where stakeholders have requested that their responses remain confidential, we have not referred to them in this document.

# 1. Internet and post we can rely on

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## Number portability

**Comms Council UK called for a review of number portability and increased support and engagement from Ofcom for business switching. Similar sentiments were expressed by Magrathea Telecommunications stating that number portability is an issue for business providers and not enough consideration has been given to the underlying complexities involved in delivering new switching processes for residential customers and businesses.**

**The Federation of Communication Services suggested that improvements need to be made to the number porting processes for business customers and resellers to enable business switching and greater choice for customers.**

We recognise the importance of industry processes such as number porting in realising better switching outcomes for residential and business customers. In our February 2022 Statement, we said that it is important for industry to take into account the interactions between switching and porting in the implementation of new switching processes. As we further explained in our letter of September 2023, we consider these interactions to be particularly important in view of the requirements set out in our high-level switching rules, including that providers must maintain simple and efficient processes for communications provider migrations. We therefore asked the Office of the Telecommunications Adjudicator to work with industry to develop and implement changes to industry number porting best practice to support better switching and porting experiences. As we explained in our September 2021 statement and consultation however, we do not consider it would be appropriate for us to mandate that industry follow a specific process for business switches in our switching rules.

## Common numbering database

**Magrathea Telecommunications was disappointed to see that Ofcom did not mention a common numbering database since industry, through the NICC, have contributed to efforts to review the benefits of such a database.**

**The Federation of Communication Services also expressed disappointment at the absence of a common numbering database in the proposed Plan of Work.**

We continue to hear feedback about the potential effectiveness of a common numbering database in supporting security, resilience and competition, as well as about the potential costs and challenges. We are considering the matter.

## Including 'Post' in 'Internet and post we can rely on'

**Wight Fibre expressed concern that the fixed telecoms sector has been treated as a maintenance activity and grouped with Post.**

**Independent Networks Co-operative Association asked Ofcom to reconsider combining internet and post into one priority and instead separate telecoms from the postal sector.**

**The Advisory Committee for Scotland expressed that the addition of ‘Post’ in the priority is too late and has resulted in our regulation being mitigation-led rather than positive.**

We have developed our priorities to help set out, in accessible language, the high-level outcomes we want to see across our sectors. They are also helpful in providing a way to group our work, broadly aligned to the duties we have across our remit.

## Broadband coverage and Universal Service Obligation

**The MSP for Highlands and Islands responded that the communities they serve are disadvantaged due to a lack of sufficient communication infrastructure including fibre. They encouraged Ofcom to take firmer regulatory action with providers who do not spend enough on maintaining infrastructure or on new investment. The Consumer Council for Northern Ireland asked Ofcom to consider the availability of high-quality networks and services in Northern Ireland, particularly in rural communities and that Ofcom should consider connectivity and customer service concerns on a regional basis.**

**The Welsh Government encouraged Ofcom to provide more details on regulatory levers available to drive broadband and mobile connectivity in the hardest to reach areas, to avoid widening the digital divide.**

**The Communications Consumer Panel and Advisory Committee for Older and Disabled People (CCP ACOD) highlighted that improvements in connectivity are only beneficial if it is coupled with usability, and that Ofcom should be conscious of those who may be digitally excluded.**

**Which? called on Ofcom to outline the proposals and timelines for a review of the broadband Universal Service Obligation (USO). The Scottish Government argued that there is a case for the minimum service level and funding cap to be increased. Consumer Scotland encouraged Ofcom to work to ensure that a choice of affordable, high quality internet and mobile phone services are available to consumers across the UK, including those in “hard to reach” areas.**

On 20 March 2025, we published a [consultation](#) containing our proposals for the regulation of the fixed line telecoms markets in the UK (excluding in the Hull Area), for the period April 2026 – March 2031. Our proposals seek to promote commercial investment in extending coverage of gigabit-capable networks (including full-fibre networks) and network competition where viable. We would encourage stakeholders to respond to our consultation which closes on 12 June 2025. We intend to take the views of stakeholders into account and to publish our final decisions by the end of March 2026. On 5 December 2024, we reported in [Connected Nations 2024](#) that the take-up of broadband services with download speeds of at least 30 Mbit/s reached 75%. This meets a statutory threshold for the UK Government to ask us to review specific aspects of the broadband USO. We will continue to monitor the delivery of the broadband USO by the designated providers (BT and KCOM) and engage with the UK Government on the future approach to the USO.

## Mobile Coverage

**Citizen’s Advice Scotland showed support for Ofcom’s work on mobile coverage to improve the accuracy and consistency of available coverage and performance, especially in rural areas. However, it asked for improvement on how this information is presented and communicated to consumers.**

**Which? stated that it hopes that Ofcom will continue to improve its methodology used to predict mobile coverage.**

**Cellnex asked Ofcom to expand its focus on improving mobile coverage and performance reporting.**

**BT encouraged Ofcom to ensure that any adjustments to mobile coverage reporting and performance measures be implemented in a way that is of most beneficial use to the consumer, minimises confusion and provides a real-world view whilst minimising the burden on providers.**

**The Scottish Government urged Ofcom to assess the effectiveness and viability of incorporating crowdsourced methods of data, as well as to change the mobile connectivity data available to government bodies to focus on signal quality rather than just coverage.**

**Consumer Scotland conveyed that Ofcom should ensure that affordable, high-quality internet and phone services are available to all consumers across the UK.**

**The Advisory Committee for Scotland suggested that Ofcom should do more to tackle connectivity in Scotland, such as ensuring mobile networks are resilient since consumers often rely on 4G for internet access.**

**The Advisory Committee for Northern Ireland encouraged Ofcom to prioritise mobile coverage for small businesses and rural areas.**

We are improving our coverage and performance reporting. Our current approach to mobile reporting, which is based on existing signal strength predictions from the mobile network operators (MNOs), has limitations. It does not always reflect consumers' lived experience, particularly in the context of trying to determine performance or coverage at a local level, which we provide on our mobile coverage checker.

We will publish our updated mobile checker by the summer. This will include the use of signal thresholds that better represent the expected performance when presenting local coverage predictions. We are also planning to incorporate crowdsource data to build on the coverage predictions. This will provide greater insight into where, and on which MNOs, consumers can expect a good experience.

## **Support for business/industry**

**Some stakeholders expressed dissatisfaction with Ofcom for its interaction with and consideration of businesses and industry. Magrathea Telecommunications said that it feels there is a lack of consideration of businesses in policy-making decisions and that it would be beneficial for Ofcom to have a business champion that represents the community.**

**The Federation of Communication Services similarly urged Ofcom to appoint a business lead responsible for economic growth. It also suggested that Ofcom should focus more on business consumers and expressed disappointment at this lack of focus in the proposed Plan of Work.**

**Comms Council UK was supportive of Ofcom tackling scams but wanted Ofcom to commit to forming an industry engagement group. Comms Council UK also said Ofcom overlooks voice services in favour of internet connectivity and spectrum, and proposed that Ofcom should appoint a business champion to help its policy formation.**

**Cellnex called on Ofcom to hold wider engagement with the wireless telecoms value chain. This was echoed by TechUK which suggested there's a role for independent experts and external auditors to aid Ofcom in its work and maintain the confidence of industry.**

**Openreach also mentioned that although it supports the proactiveness of the Connected Nations team, it finds it challenging to produce the data used for the report.**

Having a deep commercial understanding of the markets we regulate is imperative to carrying out our duties as a regulator. We continue to focus on these capabilities by recruiting colleagues with commercial experience, using secondments, and continuing our programme of commercial and consumer research. We recognise that voice markets are particularly important markets for business, and we expect the Wholesale Voice Review to include consideration of the functioning of these markets for all customers including business customers.

In relation to Cellnex's response, we would note that we engage with a wide range of organisations and are open to engaging with stakeholders across the value chain in relation to our duties.

We do recognise that the collection and submission of data for the Connected Nations programme can involve significant effort in drawing data from across multiple data sources and associated quality control activities. Over the last 12 months we have reviewed and streamlined our data collection activities, now obtaining fibre coverage information twice (opposed to three times) a year. We have also reduced the collection of data regarding legacy technologies to only once a year. These changes will lessen the burden on our stakeholders in supporting the Connected Nations programme in the future.

## Telecoms affordability and protections for vulnerable consumers and customer service

**A range of stakeholders expressed that the affordability of telecoms is a key concern for them.**

**The Consumer Council for Northern Ireland asked that Ofcom consider further telecoms affordability protections for consumers, such as monitoring consumer experience through customer satisfaction and working to understand how useable cheaper broadband and phone packages are. Citizen's Advice Scotland, although supportive of the work being done on affordability, mentioned that it is concerned about the narrow eligibility criteria of the social tariffs in place.**

We will continue to monitor and report on consumers' attitudes and behaviours regarding the affordability of communications services, and how they change through our [Communications Affordability Tracker](#).

Our [2024 Pricing Trends report](#) provided an update on the availability, take-up and consumer awareness of social tariffs. We noted that more people are benefitting from the savings social tariffs offer, with take-up growing by 125,000 (33%) to 506,000 in the nine months to June 2024. However, we recognise that awareness of social tariffs among those eligible remains low. We will continue to help raise awareness of social tariffs, by maintaining our efforts to promote social tariffs, undertaking further engagement with providers and by working with the UK Government and consumer organisations, to help ensure more eligible households are aware of the help they can receive.

While social tariffs are voluntary, and Ofcom does not have the power to introduce regulated social tariffs without being directed to do so by the UK Government, we have secured a set of consistent criteria across the social tariffs listed on our [website](#). This includes people receiving any means tested benefit (such as people on Universal Credit, Pension Credit, Employment and Support Allowance, Jobseeker's Allowance and Income Support), who are eligible to receive this lower cost tariff. If a person is not eligible for a social tariff but is struggling to afford their bill, we encourage them to speak to their provider who may be able to help (as we set out below).

**A few stakeholders were supportive of Ofcom's work on protections for vulnerable consumers, such as The Trust Alliance Group, as well as Citizen's Advice for Scotland who mentioned Ofcom's work with the UK Regulators Network. One proposal put forward by the Consumer Council for Northern Ireland is that Ofcom should encourage providers to support consumers facing financial hardship and put preventative measures in place to minimise detriment.**

We have rules in place that cover how customers are treated when they have not paid their bills. These include obligations to ensure that any measures providers take to effect payment or disconnect services are proportionate and not unduly discriminatory. In addition, we have rules requiring the fair treatment of vulnerable customers. To accompany the latter, we have made a number of good practice suggestions for providers in our [Treating vulnerable customers fairly guide](#), for the fair treatment of customers in financial hardship. It states that disconnection is a serious step that should only be used as a last resort and that providers should take several steps before it is considered. Such good practice steps include proactively and prominently emphasising provider support available for customers in debt and taking account of the customer's circumstances when contacting a customer about their debt. We continue to monitor the implementation of this guide.

**Which? stated that, following Ofcom's ban on inflation-linked in-contract price rises, some providers have introduced contracts containing annual in-contract price rises that will be greater than the value of inflation-linked price rises in 2025. Which? stated that, under these new price rise terms, the cost of cheaper tariffs will increase proportionately more than the cost of more expensive tariffs. It also noted some providers' decisions to introduce contracts containing annual price rises of the same amount.**

We have introduced rules that require telecoms and pay-TV providers, where they include price rises in their contracts, to set these out clearly in pounds and pence, before a customer signs up. This gives consumers clarity and certainty about the price they will pay, helping them choose the best deal for their needs. Telecoms markets are competitive and there are good deals available to customers who shop around. In 2024, we found that that the prices of most landline, broadband, mobile and pay TV deals had remained flat, or fallen year on year in real terms. A wide range of choice is available to people looking to buy communications services, and customers who are out-of-contract can usually pay less by switching provider or re-contracting with their current one.

**Which? asked whether Ofcom is monitoring the ability of out-of-contract customers in vulnerable circumstances to engage with the market and get the best deal for them.**

We have put measures in place to ensure people are notified when their contracts come to an end and receive annual reminders if they do not recontract. We have also made switching easier for mobile customers via Auto-Switch and for landline and fixed broadband customers via One Touch Switch. We also continue to operate a voluntary accreditation scheme for comparison tools which provide a valuable service for people navigating the broad range of telephone, broadband and pay-TV products available today and help customers to shop around with confidence and make informed choices.

**The CCP ACOD raised concerns about communications providers transitioning to completely self-service applications because of the potential of digital exclusion for some consumers.**

We expect providers to consider the needs of different consumers through their interaction and engagement with them. For example, if a customer would like to make a complaint, providers' procedures must be sufficiently accessible, including to customers who may have a vulnerability. Our rules require providers to allow customers to complain through a 'free to call' number, through postal mail and through email or a web page form in addition to any other forms of communication.

We also have a rule requiring providers, upon request, to make available all communications in a reasonably acceptable format and free of charge to any subscriber who requires it because of their disabilities. In addition, in recognition of the fact that some people do not use the internet, our [guide on treating vulnerable customers fairly](#) says that we expect providers to offer information about relevant help, support and services in different formats or through other communication channels. The guide also says we expect providers to offer a range of communication channels to customers, which reflect the needs of their customers, making sure that customers can carry out important account activities using these channels.

**Trust Alliance Group showed support for Ofcom's proposals to reapprove Communications Ombudsman as an alternative dispute resolutions (ADR) provider for mobile, broadband and landline services and to reduce the timeframe consumers must wait to access ADR. Which? noted that maintaining two ADR providers enabled choice for providers, but not for the consumer.**

Ofcom recently consulted on reducing the timeframe consumers must wait to access ADR, from 8 weeks to 6 weeks, and on reapproving both ADR schemes in the telecoms sector. We will consider all responses to the consultation carefully before publishing our final decision in Summer 2025.

**Which? noted that Ofcom play an important transparency role by publishing data on customer complaints but said Ofcom could take a more active role in improving customer service standards across broadband and mobile markets.**

We understand the importance of good customer service and have worked to help customers to get a fair deal for their services. For example, the UK's biggest broadband and pay-TV companies have committed to do this through signing up to the [fairness commitments](#) which aim to help ensure people are always treated fairly by their provider – whether they are signing up to a new deal, trying to fix a problem or switching to a new company.

As part of our work to monitor compliance with consumer protection rules, we will continue to ensure that our consumer protection interventions and voluntary initiatives are being properly implemented and that they have a positive impact on consumers. Our intel gathering work, through the review of multiple data sources including our own complaints database, will continue to allow us to take a targeted approach with providers to understand and resolve compliance concerns before they escalate.

This year, in addition to our quarterly complaints report, we will publish the comparing customer service report which will look at the quality of service provided to residential customers in the telecoms market. We will also undertake an assessment of providers' complaints handling processes, engaging with providers on areas for improvement and more widely sharing best practice across industry.

## PSTN switch-off and 2G/3G switch-off

The Public Switched Telephone Network (PSTN) switch-off (also referred to as the migration to IP) and 2G/3G switch-off were referenced several times in our responses by stakeholders.

Openreach welcomed the inclusion of migration to IP in the Plan of Work as it thought this recognised the importance of this issue. Openreach also called on Ofcom to work more closely with communication providers on the migration. Consumer Scotland expressed concerns about the impact of the migration to VoIP on Scottish consumers and outlined the communications and advocacy work it is undertaking in this area.

Comms Council UK said that there is not enough public awareness of the migration to IP and that an independent communications campaign similar to terrestrial television switch-off would be beneficial. It asked that we recommend this to Government.

Citizens Advice Scotland said that it would welcome any analysis on the impact of the transition away from 2G and 3G on services such as smart meters. It also noted that disabled customers may be particularly reliant on 2G and 3G only devices and encouraged Ofcom to ensure these consumers were supported during the transition.

The Welsh Government highlighted the potential impact of the closure of legacy services on Welsh consumers and asked for more details on Ofcom's plans to ensure users, particularly vulnerable users and the public sector, are supported and protected during the transition.

National Association of Deafened People (NADP) would welcome more transparency of the solutions being offered by the different communication providers in the switchover from PSTN to VoIP so deafened people can be more confident they are receiving a service that meets their needs.

The move from the traditional PSTN to digital Voice over Internet Protocol (VoIP) services (also known as digital landlines) is part of a broader, industry-led initiative to modernise the UK's telecoms infrastructure. This transition is driven by advancements in technology and the fact that existing PSTN is beyond its intended lifespan and is becoming increasingly unreliable. While this is an industry decision, we are closely monitoring this transition – our priority is to ensure that customers, particularly those who are vulnerable, are protected from harm during the migration. We have been clear with communications providers from the outset that they need to ensure they protect their customers when migrating them to digital landlines. We also expect providers to assess their customers' needs and offer help with migration if necessary.

We have an ongoing monitoring programme, working closely with telecoms providers, Governments (including devolved administrations), consumer groups and industry bodies to ensure that customers are migrated with as little disruption as possible and that vulnerable groups such as telecare users, those with disabilities and landline-dependent customers are protected from harm.

We consider that industry is best placed to communicate with their customers about the migration to VoIP and the products they offer and identify those that will need more support, especially as providers are following separate timescales for migrating customers in different locations. Ofcom does have information and advice about the migration on [our website](#) aimed at residential and small business customers, and we periodically promote this on our social media channels. We run a regular engagement programme with stakeholders including consumer groups and have a standing offer to consumer groups and charities to help them draft communications and information



specifically tailored for the concerns of their client groups. We continue to work closely with Government and other stakeholders to ensure key critical national infrastructure sectors are aware of the migration and what they need to do.

All mobile network operators (MNOs) made a commitment to the UK Government to switch off their 2G and 3G networks by 2033 at the latest. This will result in improved network efficiency and enable more spectrum to be used for 4G and 5G services.

In February 2023, we set out several expectations of mobile providers on 3G and 2G switch-off, which are designed to ensure that customers are treated fairly and any disruption to customers is minimised. These include expectations relating to coverage, communicating with and providing support to customers and helping to raise awareness with other services that rely on mobile networks. We regularly engage with MNOs to track progress of their 2G/3G switch off plans and ask MNOs to regularly report on this – including on the proactive steps that are being taken to support vulnerable customers during the switch-off process.

We will continue to closely monitor these transition processes through to completion. We will also continue to meet with a wide range of stakeholders to help raise awareness throughout the legacy mobile network switch offs. This includes engaging with industry bodies which represent sectors that may be affected by the network closures.

The UK Government also has a key role to play in helping to ensure that sectors that rely on 2G/3G connectivity for their services are aware of the changes and prepare accordingly. We can provide technical support, when it is required, to support with this objective.

## Scams

**Ofcom's work on scams was noted by a range of stakeholders and we were encouraged to continue our focus on tackling scams in the Telecoms sector by the likes of the Consumer Council for Northern Ireland. Some stakeholders flagged that collaboration and sharing of information across sectors is essential, and Ofcom could be well placed to facilitate this.**

**A stakeholder urged Ofcom to ensure that Tier 1 aggregators are given the tools they need to address scams. They stated that if Ofcom explores the potential to establish, operate and regulate a UK Sender ID Registry, this would help to combat fraud.**

Our [Call for Input](#) on mobile messaging scams set out available evidence on the scale of scam messages and a range of measures that could be used to protect consumers. Since the Call for Input closed we have been reviewing stakeholder responses and will explore the options further in the year ahead.

**Comms Council would support a commitment to forming an industry engagement group (as noted at 'support for business/industry'). Comms Council encouraged Ofcom to include a review of technical advancements in our plans.**

We will continue to collaborate and share information widely to tackle telecoms scams. This includes working together to identify new tactics being used by criminals and new solutions which could help to disrupt them.

## Network security and resilience

**The Advisory Committee for Northern Ireland stated that it would like to see resilience and security of networks and the 2G/3G mobile services to be considered in a Northern Ireland context.**

**Cellnex suggested that Ofcom should explore how regulatory requirements for network resilience to ensure connectivity can support advanced 5G use cases and also environmental benefit.**

The Telecommunications (Security) Act 2021 has updated the Communications Act 2003 to introduce new duties for providers of Public Electronic Communications Networks and Services, in terms of security and resilience. Ofcom is required to seek to ensure that providers comply with the duties imposed on them. The Communications Act 2003 also requires providers to notify certain security and resilience incidents to Ofcom. We continue to monitor and review network incident reports from across the UK to identify common causes or areas that may require further examination. This includes fixed and mobile networks, including public 2G/3G mobile services, across the UK including those in Northern Ireland. Our recently published [Resilience Guidance](#) provides Communications Providers with guidance on best practices for the design, architecture and operation of Public Electronic Communications Networks and Services. It reflects the changing nature of resilience risks, society's increasing reliance on connectivity, lessons learned from outages beyond the UK and Ofcom's experience of incident reporting and investigation over the past several years.

**The Federation of Communication Services said that battery back-up would benefit from specific focus in the Plan of Work. It also suggested that there should be standardisation across the industry and that infrastructure providers would be best placed to deliver solutions. It highlighted that this would help competition, reduce barriers to entry and help to reduce e-waste.**

In October 2018 [Ofcom set out its position with regard to battery backup in consumers' properties](#). Our expectations relate to compliance of our General Condition GCA3.2 and therefore while industry may choose to contract with infrastructure providers to develop efficient and cost-effective solutions, our guidance necessarily remains targeted at those for whom GC3.2 applies.

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## Telecoms Access Review (TAR)

**A number of stakeholders have expressed views on the TAR. The Scottish Government urged Ofcom to focus on the connectivity needs of rural Scottish communities. The Welsh Government suggest Ofcom uses the TAR amongst other regulatory levers, to drive the reach of both broadband and mobile connectivity further to address the hardest to reach premises which suffer from the lowest broadband speeds.**

**BUUK Infrastructure stated that Ofcom is not adapting to changes in the sector in its approach to the upcoming TAR and has suggested four areas that should be included in its scope: Openreach exchange closure and 'area' classifications, physical infrastructure access and dark fibre, exchange closure and access to required duct space, and BT and Openreach operational independence. It also stated that we should consider that the industry position BT Consumer holds could allow it to discriminate against BT Group competitors. One proposal BUUK Infrastructure put forward was for Ofcom to do a cost-benefit analysis of a full structural separation of the BT group into two entities.**

Liberty Global asked Ofcom to enable and incentivise pro-competitive consolidation and network cooperation, as this will enable the sector to continue to roll out Gigabit networks. It suggested that we consider giving a further steer as to the likely trajectory of the regulatory regime, from 2031-36, so that long-term investment incentives can be maximised. It called on the TAR to provide regulatory certainty, and to provide appropriate regulation of Openreach, preventing it from exclusionary behaviour driving competition from the market before it is able to effectively develop.

BT said that the current regulatory framework is working well due to the take-up of broadband services and 5G availability. It also agreed with Ofcom's focus on mobile coverage and telecoms digital infrastructure security.

Openreach has stated that we need to go further to develop the TAR's framework, giving instances such as our role to support migration away from copper to encourage fibre adoption as copper services are withdrawn. Openreach also noted we should review its quality-of-service measures in light of the falling copper volumes.

It was also recommended by Openreach for Ofcom to see if there are areas suitable for deregulation given the success of the Wholesale Fixed Telecoms Market Review.

Wight Fibre commented that there is a heavy administrative burden from the Physical Infrastructure Access (PIA) product which increases costs and causes delays. Independent Networks Co-operative Association (INCA) also commented on PIA, suggesting that Ofcom introduces a specific work stream to improve the PIA product and reduce differences in how PIA is consumed by CPs, and how Openreach consumes its own network.

INCA Association questioned the meaning of "availability of high-quality networks and services where they are needed" and suggests that this should be clarified. INCA Association also asked that the competition priority be strengthened, putting forward suggestive wording of "Encouraging competition at all levels and across the country to deliver efficient and sustainable markets with choice, value and high-quality services for consumers". It also put forward the inclusion of an objective to reach full-fibre adoption and reduce regulatory hurdles.

Similarly, Wight Fibre asked that Ofcom create a workstream dedicated to fibre take-up and its awareness.

NADP said it is unclear if the Telecoms Access review will include access to the telephone for deafened people through Telephone Relay Services. NADP would welcome an update on the provision of Relay services in the UK.

On 20 March 2025, we published a consultation containing our proposals for the [regulation of the fixed line telecoms markets in the UK](#) (excluding in the Hull Area), for the period April 2026 - March 2031. These proposals will build on our strategy to promote competition and investment in high quality gigabit-capable networks – bringing faster, better broadband to people across the UK. Since May 2021, the number of premises with access to full fibre has increased from 6.9m premises (24%) to 20.7m (69%) in July 2024, while coverage of gigabit-capable networks has increased from 11.6m premises (40%) to 25m premises (83%). We would encourage stakeholders to respond to our consultation which closes on 12 June 2025. We intend to take the views of stakeholders into account and to publish our final decisions by end-March 2026.

There are no current plans for Ofcom to review relay services. The most recent [user satisfaction survey](#) was published in 2024.

In relation to promoting competition, this is one of our core duties as set out in the Communications Act 2003 and we continually seek to further consumer interests in relevant markets, where appropriate by promoting competition across the sectors we regulate.

## Hull Telecoms Access Review

**MS3 suggested that in the last Market Review, Ofcom assumed there would be no material network competition in Hull, but this is no longer the case. It recommended that we perform the Hull TAR process with no preconceptions about what type/level of regulatory interventions will be appropriate. It suggested that any further delays to the Hull TAR would be a cause for serious concern because it is concerned that Ofcom will not have sufficient time to collect and assess all relevant data in time for a Q3 2025/26 publication. It expressed that it would welcome a statement from Ofcom on the scope of the Hull TAR exercise.**

We are required to review markets where we have made market power determinations within five years. We found KCOM to have significant market power (SMP) in wholesale local access and wholesale leased lines access services markets in the Hull Area and imposed regulation to address our competition concerns effective from 1 November 2021. Since then we have been monitoring developments in the Hull Area closely, in particular investment in new rival full fibre networks and competition with KCOM.

We will review telecoms markets in the Hull Area afresh and plan to begin the process of gathering evidence from Q1 2025/2026. We expect to consult on our provisional findings and any proposed remedies by the end of Q4 2025/2026.

## Postal USO, affordability and protecting consumers

**A number of stakeholders had views on the Ofcom's plans to propose reform of the postal USO. The National Federation of SubPostmasters said that financial objectives should not drive USO changes and that the needs of the consumer should be prioritised in the changing regulation. This was supported by the Consumer Council for Northern Ireland which asked that Ofcom consider the financial implications to consumers for any changes to the USO.**

**The Advisory Committee for Northern Ireland noted that there are some circumstances particular to Northern Ireland that should be considered in postal USO reform.**

**The Consumer Council for Northern Ireland and Consumer Scotland stated that Ofcom should consider the impact to rural communities and digitally excluded consumers when considering the reform to the USO. This was emphasised by the National Federation of SubPostmasters, which said that the increased costs and unaffordable pricing to communicate by letter had impacted rural communities.**

**Similarly, CCP ACOD expressed concerns for postal users with specific needs, especially in Northern Ireland and the Highlands/Islands.**

We published a [consultation](#) on 30 January 2025, setting out proposals to reform the USO. This consultation sets out our proposed reforms to support a modernised universal service that should benefit consumers by being better aligned with the needs of people and businesses. In turn, this should support the continuing affordability of services and Royal Mail's ability to provide the

universal postal service in a way that is financially sustainable. The publication includes a user needs assessment and a user needs research report that considered the impact on consumers from each Nation, as well as those in rural communities and those who may be digitally excluded. We will be engaging with the Nations Advisory Committees and consumer bodies during the consultation period to understand their views.

**There were calls for the letter sector to be renationalised by the National Federation of SubPostmasters and for Ofcom to scrutinise Royal Mail’s organisation, with concerns that Royal Mail has not been regulated enough, and that its services have become inefficient and have declined.**

The ownership of Royal Mail is a matter for the UK Government. We do scrutinise Royal Mail, including its efficiency, and each year we publish a [report](#) setting out our assessment.

**The Consumer Council for Northern Ireland called on Ofcom to revisit its decision to not include track and trace on standard USO products.**

We explain in our latest consultation that we are not proposing changes to the USO specification for parcel collections or deliveries as it would risk distorting competition in the provision of parcels. Following consumer research conducted in 2022 and 2023, we remain of the view that parcel needs are being met.

**Royal Mail asked for more specific timelines for Ofcom’s USO reform statement rather than using quarters. As well as calling on Ofcom to be quicker in its reform, it also asked for more detail and information on the reform such as Phase 2 which was omitted from the consultation and which it considers crucial to the work.**

Section 9 of our latest consultation document provides an update on next steps and other work on USO reform. We explain we are continuing to work on areas such as quality of service, affordability and pricing, as well as our ongoing post monitoring programme. It is not possible to be more specific as to the timelines for the statement on USO reform due to the uncertainty as to extent of responses to our consultation.

## Artificial Intelligence (AI)

**Liberty Global have shown support for Ofcom’s continued work concerning AI.**

We are pleased to note Liberty Global's positive response to our Strategic Approach to AI 2024/25. We have continued our work on AI and will publish our updated document later in the year which summarises this year's planned AI work and our approach.

## 2. Media we trust and value

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### BBC impact on competition

**The News Media Association urged Ofcom to place appropriate constraints on the BBC’s news websites in order to ensure sufficient competition in the UK media ecosystem. The News Media**

**Association also suggested that Ofcom does not fully recognise the scale of the impact of the BBC's online news offer and its consequences for competition.**

**Better Media stated that Ofcom's approach must address systemic barriers that prevent smaller, independent media providers from thriving in the competitive environment.**

We recognise the positive contribution that the BBC and local media organisations make to UK society and highlighted this in our recently published [Local Media Review \(LMR\)](#). The BBC is subject to requirements to meet the needs of local audiences, and in doing so will need to adapt as audience habits change. In our review we did not find significant evidence that changes to BBC local online news had affected viewing of commercially provided online local news. Our review set out in detail the challenging circumstances facing local media provision, and we appreciate the potential for BBC services to support or inhibit commercial local news. We outlined that from this year we will provide a yearly update of our view on the BBC's position in the local news sectors in our BBC Annual Report.

In line with our duties under the BBC Charter and Agreement, we will also continue to monitor BBC performance and undertake any relevant competition assessments if the BBC proposes to make any material changes to its local online news services.

Our latest Public Service Media (PSM) Review will also take forward many of the issues related to news that we have identified in the LMR. Further work will also include commissioning research to update our local news audience attitudes survey, first carried out in February 2023.

## Diversity in UK broadcasting

**The Scottish Government expressed concerns over the risk that regional specificity in broadcasting is reducing and is concerned by the changes to the BBC licence regarding its news provision in Scotland.**

**The Scottish Government also suggested that more could be done by the Public Service Broadcasters (PSBs) and Ofcom to support Scottish productions, and Scotland-based screen and broadcasting professionals. It said it would be keen to see that plans for improving diversity of the creative sector in Scotland are clearly set out. Similarly, the Welsh Government suggested that there is an opportunity to address concerns regarding the independent production sector in Wales and the diversity of content being commissioned.**

**The Scottish Government would also welcome much broader reference in the Plan of Work to address the imbalance in the consideration given to Gaelic compared to the Welsh language. Bòrd na Gàidhlig also commented that it was time for Ofcom to review Gaelic-language media.**

**Better Media suggested that the existing diversity monitoring frameworks often overlook the contributions of community media and freelancers. Better Media also suggested that Ofcom's current policies insufficiently address the distinct media needs for devolved regions, risking a one-size-fits-all approach and that media regulation should reflect the unique identities, languages, and priorities of each devolved area.**

To help ensure that we engage effectively and that media regulation reflects the distinct identities, languages, and priorities of each area, we have offices and dedicated teams in each nation. Additionally, we will be advised by the Nations Advisory Committees for each nation and engage with consumer bodies during our consultation periods to understand their views, to ensure that we can effectively reflect regional diversity.

Last August we approved the BBC's request to change the amount of news it provides on the BBC Scotland channel. As well as existing reporting conditions, we set out that the BBC must continue to explain how it is delivering to audiences in Scotland and that we would be monitoring its performance. We expect to report on this in this year's BBC Annual Report.

The BBC's Operating Licence has specific conditions requiring the BBC to serve audiences in Scotland and Wales, including in relation to Welsh and Gaelic language services while S4C as a Welsh language channel is subject to obligations.

As set out in our [Review of Public Service Media \(2019-23\)](#), we have always been clear that a diverse workforce makes for better representation and portrayal on-screen and helps create content that authentically speaks to all audiences. We also noted that the PSBs have shifted more of their production across the UK, and that Scotland's screen sector has grown in recent years. Transparency requirements in the Operating Licence oblige the BBC to publish its planned steps to provide content of interest and relevance to audiences in each of the nations each year. Furthermore, the BBC and Channel 4 have particular obligations to support the development of the creative sector and have made significant commitments to supporting talent and skills both within their own organisations and in production companies across the UK. Part 2 of the PSM review continues to explore what else might be done to secure the continued provision of PSM content that reflects the diversity of the whole of the UK. We will also carry on monitoring the state of the screen sector in each of the nations – which has grown in recent years – as well as the PSBs' ongoing delivery of our regulatory requirements, such as the Made Outside London quotas, which we report on annually.

While we fully acknowledge the contributions of community media and freelancers to a diverse sector, our statutory duties relate to the promotion of equality of opportunity within larger broadcasters' own workforces. We have periodically requested diversity data on a voluntary basis from smaller broadcasters, including community media, and work closely with other organisations such as the Creative Diversity Network whose Diamond system monitors the diversity of freelancers. We are also now requesting diversity data by nation/region, to make sure that we understand and track under-representation across the UK.

## Accessibility

**The National Association of Deafened People (NADP) said it was encouraged to see that Ofcom plans to regulate accessibility of video on-demand (VoD) content. NADP would like to see more work done to ensure that access is available on all platforms and media.**

**NADP also said it believes that technology has advanced sufficiently that radio programmes could be captioned and would welcome a discussion on this with Ofcom and providers.**

**CCP ACOD expressed concerns that Ofcom's work does not cover the regulation of devices.**

The Media Act revisions to the regulatory framework for on-demand services include new requirements for accessibility of certain VoD services. In implementing these requirements, Ofcom is clear that we want to see consistency of experience for disabled audiences across as many platforms as possible. We will be consulting on how the quota requirements for subtitles, signing and audio description will operate. For the BBC we have set out why we have not to date introduced guidance on radio accessibility. We cannot mandate radio subtitles for other broadcasters as this is not within

the scope of the current legislative requirements. This would require new legislation from Parliament.

We have been following technical developments to ensure that we make appropriate recommendations in our 'best practice' guidelines on accessibility and were pleased to see that the BBC has been trialling automatically generated subtitles for radio. We would welcome further discussion in this area, including via our accessibility forum which is attended by user groups, broadcasters, VoD providers, and platform operators.

## Safeguarding Freedom of Expression

**We received 61 responses, of which 50 were identical, expressing that safeguarding freedom of expression should be the top priority of Ofcom for 2025/26. They also stated that new media outlets were being unfairly treated, and that Ofcom should take action to put an end to this.**

Safeguarding freedom of expression is central to Ofcom's role as the UK's regulator of broadcasting standards. Under the Communications Act 2003, Ofcom must set broadcasting standards that appear to it best calculated to secure the various standards objectives set by Parliament and in doing so have regard to the desirability of maintaining the independence of editorial control over programme content. Ofcom's Broadcasting Code is drafted and applied taking into account Article 10 of the European Convention of Human Rights. This provides for the broadcaster's and audience's rights to freedom of expression, which encompass the right to hold opinions and to receive and impart information and ideas without unnecessary interference by public authority. This means Ofcom carefully considers both broadcasters' and audiences' Article 10 rights each and every time it applies the Code to broadcast content, so that any restrictions are only imposed when legitimate, necessary and proportionate.

## Public Service Media Review

**A number of stakeholders commented on the PSM review. The Advisory Committee for Scotland expressed concern over whether the PSM review and PSM landscape is fit for purpose, citing the impact of AI on the sector, production in Scotland and Scottish audiences. It also highlighted the vague wording of challenges faced by Scotland regarding PSB and media literacy and requested more clarity on these issues.**

**The Welsh Government highlighted that the need for prominence and visibility of Welsh content, as well as an understanding of the unique circumstances of Wales, must be considered as the use of on-demand and VoD evolves. It also stated that it would be keen to know how the distinct needs and circumstances of Wales' audiences are being considered regarding mis- and dis-information and the changing context for the provision of news.**

**Better Media stated that Ofcom should consider the threats to the UK's media landscape by international media platforms because of their potential to undermine local media diversity, community engagement and public trust. It suggested that integrating community media into the broader ecosystem offers the opportunity to rebuild trust and foster locally rooted and diverse content creation.**

In December, we published a [review of Public Service Media from 2019-2023](#). This set out that despite the significant challenges the PSBs had faced over the last five years, they were delivering for



UK audiences. We also outlined the future challenges and opportunities for Public Service Media given the substantial changes in audience viewing habits. These included the difficulty in attracting audiences to PSM content online (given the wealth of content available on global platforms and streamers) and in particular reaching certain audience groups (like children and young people) and the potential impact of this on their future sustainability. We also highlighted how hard it is for audiences to find high-quality, accurate news that they trust online – which is particularly important to counter mis- and dis-information (which may be exacerbated by developments in AI). In addition, we were concerned that the financial challenges facing PSBs will persist and noted they are finding it difficult to monetise content online.

We are engaging with a wide range of stakeholders (including in the nations) on these challenges and what the potential remedies might be to address them. We will publish our findings on how to maintain and strengthen the provision of PSM content in Summer 2025. This will include what might be done to secure the continued provision of PSM content that connects with all audiences and reflects the diversity of the whole of the UK. We will also set out our views on how broadcasters can help to counter mis- and dis- information and improve media literacy. As well as our assessment of the opportunities and risks that AI presents to the media sector in general and the provision of trusted and accurate news in particular.

In addition, we are progressing our work to implement the Media Act provisions that will require connected TV platforms to ensure that the PSBs' TV apps and public service content – including S4C's app Clic - are available, prominent, and easily accessible to audiences across the UK. This work will continue during 2025 and 2026.

## Intellectual property

**News Media Association suggested that there needs to be a robust copyright framework in the creative and tech sectors which preserves rightsholders' exclusive rights to control their works and thereby act as a safeguard against misuse.**

We recognise the strength of concerns regarding copyright, in particular with regard to the development of AI. While the specific issue of copyright is outside our remit, we will continue to work closely with other regulators and the UK Government to ensure that the creative sector is well placed to exploit new opportunities and is protected from undue risks.

## Commercial radio regulation

**Better Media suggested that the current broadcast radio spectrum access framework disproportionately favours large-scale providers.**

**The Advisory Committee for Northern Ireland expressed interest in radio deregulation and in particular, what this may mean for local news in Northern Ireland.**

We do not agree that Ofcom has favoured large-scale providers in its radio licensing activity. There have been no new local analogue commercial radio licences since 2016, and the most recent local radio multiplex licences were advertised in 2019. In the eight years since 2016, we have licensed 73 new analogue community radio services and facilitated improved coverage for 187 stations in addition to completing analysis in relation to multiple site moves for community services. In addition, we have so far awarded 129 small-scale radio multiplex licences which have enabled nearly

300 smaller-scale radio stations, including many catering for minority ethnic and ‘grass roots’ communities, to broadcast on DAB.

As part of the Media Act 2024, the UK Parliament made several deregulatory changes to the statutory regime for commercial radio services, reflecting changes in the market since the last major media legislation. One aspect of this is that operators are no longer required to meet programming commitments made at the point of application, often more than twenty years ago. The effect of this is that Ofcom can no longer require licensees to broadcast certain types of speech or music programming, although stations will be required to broadcast regular local news and information. There is also a new requirement that some or all local news is “locally-gathered”. We will be consulting shortly on how we propose to implement this new framework and look forward to receiving views on our proposals from all parts of the UK.

## Small scale DAB

**UK Community Radio Network urged Ofcom to complete small-scale DAB (SSDAB) round 8 before the end of 2025, so that Ofcom could prioritise other work across broadcast radio. It also suggested that there should be a period of reflection on SSDAB and Ofcom should enable the last rounds to launch prior to any work on the further development of SSDAB.**

**Better Media called on Ofcom to allocate additional resources to allow the completion of SSDAB multiplex licensing to be accelerated, while also calling on Ofcom to publish real-time multiplex coverage maps and ensure pricing transparency for small-scale broadcasters.**

Our SSDAB licensing plans were set out in our [Small-scale DAB progress report](#) of October 2024.

## Community radio

**Coast Community Radio highlighted the high costs associated with broadcasting and suggested that these costs may deprive communities from having their own radio station. It suggested that Ofcom is contributing to a lack of local radio in Wales through a discriminatory roll-out of SSDAB rather than analogue licensing, and that Ofcom should include the advertising of community radio licences on FM in the Plan of Work.**

**Community Media Association urged Ofcom to continue advertising new free FM frequencies in under-served communities.**

**Rutland and Stamford Sound asked Ofcom to license new FM services in suitable areas once the SSDAB licensing programme comes to end. It also suggested that radio stations should be able to broadcast on FM, as well as current platforms of online and SSDAB.**

**Banbury FM stated that Ofcom continues to refuse new FM radio entrants and fails to do any research into why there is a decline in FM radio listening. It called on Ofcom to include a commitment to more analogue licensing which would allow Banbury to have its own new licensed FM local radio station. It also suggested that in many areas there is not more than one financially viable local broadcaster in the market, so the extra capacity offered by SSDAB is meaningless.**

**UK Community Radio Network (UKCRN) expressed its wish to continue to lobby for the future development and licensing of Analogue Community Radio along with Better Media (which also**

referenced the possibility of considering an on-demand, transparent licensing process) and a further stakeholder who wished to remain confidential.

UK Community Radio Network also stated that further and more detailed research needs to be conducted into listening habits and preferences for community radio audiences, and suggested the current data for the industry does not fully measure the true picture of radio consumption behaviours.

One local radio organisation for a rural community expressed concern about the lack of radio plurality since the community radio station closed.

The Welsh Government highlighted the importance of Welsh language radio and local radio.

Ofcom recognises the significant benefits afforded to listeners across the UK due to the ongoing presence of community radio services and their delivery of social gain for the communities they serve. The provision of these benefits continues to grow with a range of new services to market being deployed on the SSDAB platform. However, we do recognise there is some demand for more analogue licensing, particularly in unserved and/or rural areas where SSDAB coverage is harder to achieve in a sustainable way. In our [SSDAB progress report](#) published in October 2024, we acknowledged this demand and confirmed that our priorities remain to focus on the final rounds of the SSDAB programme before considering what comes next in line with our duties and functions, as well as market conditions. We will engage stakeholders in this process through a consultation and the timeline for this work will be communicated after we have received the applications for Round 7.

Ofcom has commissioned research focused on creating a framework and toolkit which can be used by the community radio sector to showcase and/or improve the delivery of social gain they provide to their communities. This is intended to support services with future funding applications and attract volunteers to support the ongoing sustainability of individual services. We note the point made by the UKCRN regarding its call for additional research into listening habits of community radio audiences. We will consider this in the future should we decide to commission any further research focused on the community radio sector.

Ofcom recognises the importance of local services in Wales to help support the provision of local information and the continued presence of content delivered in the Welsh language. Of the nine community radio analogue services based in Wales, eight continue to have a commitment to broadcast some of their content in Welsh, with this provision extended through the roll-out of SSDAB.

## Affordability

**Community Media Association suggested that Ofcom should support community radio by ensuring that commercial stakeholders who work with community radio licensees keep their costs low/affordable.**

We note the request for support from the Community Media Association in this matter. We meet regularly with the community radio sector trade bodies and discuss the collective financial wellbeing of the sector.

### 3. We live a safer life online

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#### Ofcom's 'We live a safer life online' priority

**The Online Safety Act Network suggested that the Plan of Work is too process-focused for the online safety regime.**

Ofcom's Plan of Work sets out how we will deliver on our duties for the coming year for the whole of the organisation. It touches on all areas of Ofcom's regulatory remit, including telecoms, spectrum, post, broadcasting and online safety. For specific proposals across our remit we run consultations and we continue to engage with stakeholders in a variety of other ways.

For greater detail on Ofcom's expected outcomes for the 'We live a safer life online' priority, see [Implementing the Online Safety Act: progress update](#).

**Online Dating and Discovery Association expressed its support for Ofcom's desired outcomes for consumers, which it considered would give consumers more confidence while providing greater transparency in the way online services keep people safe online, but would like Ofcom to make sure that regulation is not disproportionate on smaller firms and wanted to see more of a risk-based approach that allows for flexibility in how services address risks.**

Our research indicates that over 100,000 online services are likely to be in scope of the Online Safety Act (OSA), varying from very large to small firms. We know that new regulation can create uncertainty, especially for small organisations which may be run on a part-time or voluntary basis. We have developed some [digital tools](#) to support organisations to navigate the OSA and minimise the burden on smaller firms. We also run events and provide online content to help smaller services understand their obligations under the OSA.

We do expect all in-scope services – no matter their size – to take steps to comply with the OSA. Nevertheless, Ofcom's approach to regulation is based on proportionality, considering the size and risk levels of a service. If a small organisation has carried out a suitable and sufficient risk assessment and determined, with good reason, that the risks it faces are low, most of the measures we have recommended are a direct result of specific requirements in the OSA, over which we have limited discretion. We have imposed very few measures beyond that and the combined costs of the areas where we have discretion is expected to be very low.

#### Government's Draft Statement of Strategic Priorities (SSP) for online safety

**Online Safety Act Network highlighted that Ofcom should incorporate the draft SSP into its Plan of Work and should publish its consultation response to DSIT alongside the final statement.**

**Which? expressed disappointment that the proposed Plan of Work does not reference how Ofcom plans to use the OSA to tackle online fraud, and highlighted that the draft SSP included an ambition for a "material reduction in online fraud within scope services".**

The SSP is not yet formally designated. The consultation closed in January and Government is now finalising the document. Following the consultation, the Secretary of State will then lay the SSP before Parliament.

Once the final SSP is formally designated, we will need to have regard to it when carrying out our online safety functions. Ofcom will confirm how it will take the SSP into account once the Parliamentary process concludes later in the Spring.

## Safety by design

**The Online Safety Act Network suggested adding safety by design into the final Plan of Work.**

**The CCP ACOD highlighted the need to use universal design principles to ensure communications are served fairly to the ‘average consumer’. This includes informed design to support those with neurodiversity needs.**

A core objective of the OSA is to ensure services are safe by design, i.e. that firms embed safety considerations in the very design of their services as they take decisions on new products, features, and commercial strategies. This is seen in the OSA and the draft SSP through:

- the Act’s intent for services to be ‘safe by design’,
- the focus on systems and processes,
- the risk-based approach to regulation,
- references to governance and accountability, and
- the role of the safety duties (via codes measures).

Safety by design is a golden thread running through our approach to regulation and regulatory products – including the risk assessments, codes, info gathering processes and more. How these individual regulatory products work together is how Ofcom can encourage services to embrace safe design.

We expect all in-scope services to be prioritising user safety, tackling risks to users and designating named senior accountable people. This includes services assessing, managing and recording the risk of harm to users.

## Enforcement activities

**Yoti welcomed Ofcom’s ‘shift towards implementing and enforcing’ the online safety regime. However, it also called for more concrete timelines for Ofcom’s actions and use of its enforcement powers and more transparency around Ofcom’s supervision activities with services.**

**TechUK encouraged Ofcom to be open and transparent throughout the enforcement process. It suggested there may be a role for independent experts and external auditors to support Ofcom’s work, for example, when enforcing the fees and penalties regime.**

We set out our approach to enforcing compliance with the new duties as they come into effect over the course of 2025 in [Ofcom’s December 2024 Illegal Harms Statement](#) (see pages 79-80). We have published information on our website to help providers understand [important dates for compliance with the new rules](#). We have also recently launched our [online safety industry bulletin](#) which highlights key things providers need to know and do over the coming months.

Decisions around whether to take enforcement action are made on a case-by-case basis, having regard to our statutory duties and all of the factors that appear to be relevant. We expect to prioritise enforcement in line with our prioritisation framework, as set out in paragraph 3.9 of our

[Online Safety Enforcement Guidance](#). This guidance also sets out further information around our approach to using our enforcement powers under the online safety regime.

In line with our regulatory principles of transparency and accountability, Ofcom publishes information on the enforcement actions we take at various stages of the process. As set out in our Online Safety Enforcement Guidance, this generally includes a case opening announcement at the time we open an investigation and updates at important milestones. Where we find a breach, we will publish a non-confidential version of our confirmation decision, including any remedial steps required, on our website.

We also have a team who “supervise” service providers, i.e. engage more informally to drive change. Supervision (in conjunction with other Ofcom teams) will help ensure that providers have appropriate systems and processes to achieve the key outcomes intended by the OSA to make life safer online for people across the UK. Our duties regarding the disclosure of information about particular businesses, in section 393 of the Communications Act 2003, prohibit us disclosing information about the specific engagement we have with individual regulated services except where a disclosure ‘gateway’ exists.

Whilst there will be reference to the use of external auditors in our forthcoming fees and penalties statement, we expect that this will primarily be addressed through our supervisory and enforcement programmes.

## Publication of evidence

**Yoti asked for more transparency around the evidence used by regulators which underpin key decisions.**

**TechUK would welcome the publication of evidence which Ofcom has used to reach decisions, in order to lead to more informed conversations and increased transparency.**

As an evidence based regulator, we recognise that transparency, and being clear about the decisions we have taken and why, is fundamental to building trust in the online safety regime. This is already embedded in a lot of the work we do – particularly around our consultations and policy decisions. We generally try to publish the evidence we have relied on in our consultations and when making decisions. We redact information where disclosure is not justified under section 393(2) of the Communications Act 2003.

Moving forward we want to continue to build on these efforts in a number of ways, including continuing to share regular monthly updates via our online safety newsletter and using our quarterly industry bulletin to provide key updates to regulated services. We will also publish strategic updates at key points during the year, including our annual online safety update which will set out what we have done, what we have learned and what we are planning on doing. A key part of this will be looking at where the regime is having a positive impact for people across the UK and where we need to look at going further to tackle specific issues.

## Women and girls' online safety

The CCP ACOD recognised that Ofcom must prioritise its efforts in Online Safety on the protection against Women and Girls but would encourage Ofcom to consider other communities at risk of harm such as LGBT+ online users.

**Online Safety Act Network questioned why the proposed guidance on protecting women and girls is now referred to as “best practice guidance”. It highlighted that there is no specific mention of the UK Government's pledge “to halve violence against women and girls in the next decade” and Ofcom's role in relation to that. It also highlighted a lack of any mention of engaging with victims or those with lived experience of online harms.**

The Online Safety Act 2023 requires Ofcom to produce guidance which focuses on ‘content and activity’ in relation to which providers have duties set out in Parts 3 or 4 of the Act and which disproportionately affects women and girls. The guidance may, among other things, “contain advice and examples of best practice” for assessing and reducing risks of harm to women and girls. This [draft Guidance](#), which we published for consultation in February 2025, combines the legal responsibilities service providers now have to protect their users, with innovative good practices to deliver a new and ambitious vision for women and girls’ online safety.

The draft Guidance covers the harmful ways online services are used to control, exploit, monitor, silence, humiliate, abuse, and threaten women and girls because of their gender. We have noted in the draft Guidance that women and girls with multiple protected characteristics, such as LGBTQ+ communities and women from ethnic minority backgrounds, face additional harms. As noted in the Equality Impact Assessment for the draft Guidance (a provisional assessment subject to consultation), “taken together, we expect the foundational and good practice steps to improve online safety for all groups, extending beyond women and girls who are the specific focus of the draft Guidance, to other individuals with protected characteristics, in line with the broader aims of the Act.”. In the draft Guidance, we have noted the UK Government’s commitment to halve violence against women and girls in a decade, as well as government initiatives by the Northern Ireland, Welsh, Scottish Governments.

We engaged with service providers, civil society organisations, researchers, survivors and victims, safety tech organisations, public sector bodies, and other experts about the proposals in the draft Guidance and how to take them further. We also welcomed the DSIT Secretary of State to speak on this topic at a major event that we hosted in November 2024. We hope to continue this engagement through the consultation process as we gather additional insights and highlight emerging issues.

**The Advisory Committee for Scotland highlighted the need for more clarity around the key challenges in the devolved context, in areas like the eradication of violence against women, and when considering new legislative changes, like the Misogyny Bill.**

The Scotland team works closely with stakeholders within Scotland to proactively identify any topics that have greater relevance or interest within Scotland. This includes monitoring legislative changes within Scotland, and the Scotland team are ready to offer advice to stakeholders on the intersection of online safety laws in the devolved context when requested. For example, we are working with the Scottish Government closely on our joint goal of addressing women and girls’ online safety, which is reflected in our plan of work priorities for 2025/26.

## Age Assurance & Age Verification

Yoti and TechUK suggested there should be clear benchmarks for what constitutes “highly effective” and “effective” age assurance, and that these measures should be in line with the ISO Part III standards.

Yoti expressed its view that in addition to age verification for adult content, Ofcom should ensure that effective and privacy-preserving age assurance measures are in place for younger users accessing mainstream online services.

Yoti and TechUK suggested that Ofcom collaborate with the Information Commissioner’s Office (ICO) and Digital Regulation Cooperation Forum (DRCF) to conduct a comprehensive review of age assurance methods for users aged 13 and above.

Yoti also urged Ofcom to use supervisory technology to monitor compliance, detect non-compliance early, and streamline enforcement actions.

Yoti supported Ofcom’s involvement with the Global Online Safety Regulators Network (GOSRN) but noted that GOSRN did not prioritise age assurance in its [“Three Year Strategic Plan Publication 2025”](#).

TechUK thought that it is important for Ofcom to collaborate with the Home Office as it prepares to implement stricter age verification checks for all knife retailers.

In January 2025, we published the [Age Assurance and Children’s Access Statement](#), which set out Ofcom’s final positions on the concept of highly effective age assurance. Stakeholders should consult this statement for Ofcom’s response on assessing and monitoring effectiveness (paragraphs 3.349-3.356); our consideration of international standards (paragraph 3.261); and how we work with the ICO on age assurance (paragraphs 3.286-3.289).

In April 2025, we will publish our Protection of Children Statement, which will set out the full range of Codes measures that providers of user-to-user services that are likely to be accessed by children will be expected to take to protect children from harm online, including age assurance measures. We will consider and address the subject of minimum age and age groups, including effectiveness of age assurance methods for users aged 13 and above, in our Protection of Children Statement in April.

For details of Ofcom’s approach to enforcement, stakeholders should consult the [Online Safety Enforcement Guidance](#).

We note Yoti’s comment about GOSRN’s priorities. We are pleased to chair the network for a second year, having recently published a [three-year strategic plan \(2025-2027\)](#) for the network. This is one of several key international fora where we engage to promote regulatory coherence. We anticipate that across our international engagement in the year ahead, key topics of focus will include risk assessment and mitigation, age assurance and safety by design.

Ofcom actively pursues engagement with a variety of stakeholders, including the Home Office, to maintain an open dialogue, exchange knowledge and achieve alignment on age assurance where appropriate.



## Partnerships

**The Online Safety Act Network asked for further details about Ofcom’s partners and how Ofcom will work with them.**

We take a targeted approach to collaborating and information sharing with our partners, to enable effective delivery and impact of the online safety regime and create a safer life online for UK users.

This means building and optimising relationships at the right time to support our Online Safety priorities, secure information and intelligence sharing to support operational delivery, and evaluating insights and outcomes to measure impact and inform our strategic priorities.

We will continue regular engagement and further formalise our partnerships, both within the UK and internationally. This brings together regulators, law enforcement agencies, government departments, civil society and academia, at varying degrees both bilaterally and through multi-agency groups, to create a robust and resilient ecosystem of organisations better equipped to combat online harms.

Our partnerships have supported Online Safety policy development, but as the codes come into force, we are developing them further to inform operational delivery.

## Engagement plans

**Online Safety Act Network recommended that the final plan includes reference to victims, victims’ representatives and/or lived experience in order to fully deliver Ofcom’s aims to “understand user experiences online”.**

**The CCP ACOD supported Ofcom’s intention to work more closely with academics and how this will inform Ofcom’s future-looking policies.**

We have worked hard to understand the detrimental impact online harms can have on individuals, as well as the wider impact on the families and communities which are subject to online harms. We have a well-established programme of research that helps to provide important insights and evidence to support our work, but we have done less direct engagement with those that have lived experience. This is something we want to change and over the last year we have taken steps to engage directly with those who have lived experiences of online harms to ensure this perspective is incorporated into our wider development policy work. We are also exploring ways to embed these types of engagement practices into our wider work. Engaging with people who have lived experiences of online harms is important because:

- we can provide individuals with avenues to contribute to our policy development work in a meaningful and accessible way;
- we can engage in an ongoing dialogue outside of the formal consultation responses;
- we can develop policy which is informed by the experiences of those who have experienced the relevant harm, meaning it is more likely to benefit the people most greatly impacted.

Engaging with academics, as well as civil society groups and expert bodies, to ensure our work is informed by their expertise is also a critical aspect of our approach to developing regulatory policy. Ofcom works with academics in various ways, giving us opportunities to exchange ideas and help us fulfil our role as an evidence-based regulator. This includes: supporting proposals and projects, running working groups and panels to support the delivery of our work, hosting events and conferences, offering secondments for later career academics, co-sponsoring PhD studentships and

following open data principles to make the data we collect and create available to academics and the wider public.

On 15 April 2024, we published the first research agenda for online safety. By publishing it, we hope to encourage interested academics and researchers to consider how best to achieve our shared research goals.

## Complaints & dispute resolution

**The Trust Alliance Group said it believes that user access to an impartial Digital Dispute Resolution would support the Online Safety regime.**

**The CCP ACOD's work looping into complaints and Alternative Dispute Resolution (ADR) systems highlighted how challenging it is for smaller business to navigate the communications sector and how reporting impacts consumer confidence.**

Individual complaints from users should be directed to the provider itself as it is best placed to resolve issues. We note requests from stakeholders that we should play a role in service providers' complaints procedures, or offer an independent appeals process, but this is beyond the scope of our role as set out by the Act.

The OSA also does not give us powers to include ADR recommendations in the Codes. It would be for the Secretary of State to amend the OSA by regulations to include ADR following consultation with Ofcom (and others).

The OSA does require Ofcom to produce a report assessing providers' measures to comply with their reporting and complaints duties. As part of that report, Ofcom must advise the Secretary of State on whether to make regulations requiring providers to establish ADR procedures. It is for the Secretary of State to decide when the section will be commenced.

## Making Sense of Media (MSOM)

**The Consumer Council for Northern Ireland said that Ofcom should promote understanding of the new online safety regime and engage consumers with its Media Literacy strategy. Better Media suggested that Ofcom should invest in nationwide programmes to empower citizens to critically engage with online content.**

**Online Safety Act Network argued that it is not clear that Ofcom are taking seriously their expanded powers regarding media literacy.**

**Citizen's Advice Scotland welcomed the Media Literacy programme and its initial investment but says more needs to happen to close the digital divide such as further investment from Ofcom and others.**

**TechUK urged Ofcom to continue its MSOM work on digital inclusion and other important educational initiatives, such as partnering with educational institutions and other organisations, including the tech sector, to assist with upskilling workers. Which? suggested that it would be useful to know what further digital inclusion work Ofcom was undertaking.**

**The Welsh Government is particularly supportive of the MSOM work and is keen that this is further supported and developed.**

Our approach to media literacy is outlined in our [three year media literacy strategy](#). The strategy makes explicit reference to the ways we are addressing the media literacy duties outlined in the OSA. We are very clear that Ofcom alone cannot improve the nation’s media literacy skills, but that media literacy needs to be everyone’s business. To ensure the most efficient use of our resources, we intend to build on the existing digital inclusion infrastructure, including by commissioning Good Things Foundation to produce new media literacy content on their Learn My Way programme, and by supporting digital inclusion teams working in local authorities to embed media literacy skills support in their work. We are working specifically with communities in each UK nation to understand “what works” for a place-based approach to media literacy and will be dedicating time to sharing our learning over the next two years.

## 4. Enabling wireless services in the UK economy

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### Spectrum management and mobile service

**Liberty Global suggested that the most important driver for successful spectrum policy should not be focus on maximising (auction) returns, but rather pursuing a set of balanced objectives that focuses on the overall benefits of spectrum allocation.**

**To drive mobile connectivity in unserved and underserved areas, the Welsh Government would like Ofcom to explore coverage obligations in future spectrum auction and other financial incentives such as reducing auction proceedings or Annual Licence Fee (ALF) in return for coverage commitments and the need to monitor such commitments. It also welcomed details from Ofcom on how it will ensure MNOs meet their future Shared Rural Network (SRN) obligations and improve mobile coverage beyond the SRN obligations. Similarly, Cellnex asked Ofcom to consider innovative ALF regimes with DSIT to help achieve better UK mobile service, for example using ALF receipts to fund network densification via a structure involving the whole wireless value chain.**

**Cellnex supported Ofcom's plans to award the mmWave spectrum and notes the significant role of these frequencies to support mobile network densification and fixed wireless access.**

Our duty is to secure optimal use of spectrum for the benefit of UK citizens and consumers. In designing spectrum auctions and in setting annual licence fees, we aim to channel market forces to secure efficient allocation of spectrum. We recognise that further investment to improve mobile connectivity in rural/unserved areas is required. Using coverage obligations in spectrum auctions can be an appropriate tool to help drive such investment but has limitations. For example, we concluded that sharing infrastructure in the Shared Rural Network programme enabled the MNOs to commit to more extended mobile coverage than we could have secured through coverage obligations in the 2018 spectrum auction.

We could consider the future use of licence obligations, such as investment in coverage, instead of or in addition to annual licence fees. However, doing so would mean setting requirements based on policy choices rather than market forces, and this could distort the market and make efficient allocation less likely. We suggest that Government is better placed to decide whether to use public funds to address social objectives such as addressing poor coverage in rural areas.

Following the CMA's December 2025 decision on the Vodafone/Three merger review, we will be monitoring and enforcing the merged entities' network commitment. We consulted in December 2024 on updating our annual licence fees for mobile spectrum, which would reduce costs for operators. We also intend to confirm by the end of 2025 the regulatory framework for satellite connectivity direct to mobile handsets which could extend mobile connectivity in unserved areas. We are working with the UK Government on what additional measures may be necessary to drive further mobile infrastructure investment.

**Viasat recommended Ofcom refrain from auctioning spectrum above 1492 MHz as it considers any use of the band 1492-1518 MHz by terrestrial mobile systems will require the implementation of complex compatibility measures to protect Viasat's current and planned MSS operations in the United Kingdom.**

We recognise Viasat's concerns regarding coexistence of its service with adjacent mobile service in the 1492-1517 MHz block. We consulted in February 2025 on our approach to protection of Viasat's receivers.

**BT asked Ofcom to develop a spectrum roadmap for national mobile networks that is wider than the mmWave and 1.4 GHz band. It suggested this should also include a review into the usage of the 3.8-4.2 GHz band, with a view to ensuring the bottom 300 MHz is predominantly reserved for high power applications by national operators, whilst retaining the top 100 MHz for low and medium power licences, as well as the upper 6 GHz band and potentially the 600 MHz band.**

**BEIRG had concerns about the decisions taken in the near-term regarding potential changes of spectrum use in the 470 – 694 MHz band and the future of TV distribution. It believed that this will have a profound effect on Programme Making and Special Events (PMSE).**

Regarding BT's request for mobile spectrum roadmap, we set out in our [February consultation on the 6 GHz band](#) that we are committed to enable both Wi-Fi and commercial mobile to access the band on a shared basis. It is our intention to make spectrum in the upper 6 GHz available for mobile once the outcome of European harmonisation is clearer. We are advising the UK Government on the future of TV distribution, including the spectrum implications to existing PMSE users. We recognise that a number of future scenarios for TV could potentially enable release of the 600 MHz spectrum and we would consult in due course when decisions on the future of terrestrial TV are taken, having considered the overall costs and benefits to society and the UK economy. We have completed a review of our authorisation approach of the 3.8-4.2 GHz which resulted in increased access to spectrum to support innovation and growth. We will continue to monitor demand for this spectrum, alongside technology and international development, and would consider updating our authorisation framework when appropriate in line with our duties.

**Cellnex emphasised the importance of clarity regarding the allocation of the 1900 MHz band for Future Rail Mobile Communications System (FRMCS), timescales and likely technical parameters to maximise its ability to use existing rail infrastructure investment in Brighton Mainline to support future FRMCS.**

We note Cellnex's comments on the 1900 MHz band and would encourage Cellnex to respond to our [March consultation](#) on the future use of the band.

## Upper 6 GHz band

**A number of respondents raised the Upper 6GHz band.**

**Wi-Fi Alliance suggested that Ofcom should investigate possible Wi-Fi use cases for the 6 GHz band, that could lead to a number of social and economic benefits.**

**IEEE 802 LAN/MAN Standards Committee said it would like Ofcom to make the upper 6 GHz band available for Wi-Fi at earliest opportunity and with a clear timeline to do so. It said that this will create economies of scale, produce a robust equipment market and benefit the UK economy.**

**Hewlett Packard Enterprise (HPE) said it believes that upper 6 GHz is the only suitable spectrum that can satisfy the growing performance requirements of the latest iterations of Wi-Fi (Wi-Fi 6E, Wi-Fi 7, Wi-Fi 8 and beyond) and urged Ofcom to open up the band swiftly.**

**In a joint response from Broadcom, Cisco, HPE, Intel and Meta, they noted they would like Ofcom to urgently enable the upper 6 GHz band for Wi-Fi. They argued that these technologies would not**

interfere with existing services and therefore allow for greater spectrum efficiency. Furthermore, they see demand for 6 GHz growing, for example Wi-Fi 6 and Wi-Fi 7, and think it will allow for a range of innovative use cases for enterprise and consumers, such as AR/VR or robots across a range of sectors. They warned that any delay in the decision for upper 6 GHz risks the UK falling behind other countries and may reduce investment in UK digital infrastructure.

Dynamic Spectrum Alliance requested immediate action for the upper 6 GHz being enabled for licence-exempt Wi-Fi users, especially for Low Power Indoor (LPI) and Very Low Power (VLP) operations. It also suggested that this would align with Ofcom's focus on enabling wireless connectivity.

Cellnex UK asked that, unlike the mmWave auction, Ofcom ensure future authorisation of the upper 6 GHz band for mobile networks guarantees physical deployment to deliver societal and economic benefit.

BT proposed a more open position is taken on hybrid sharing in the upper 6 GHz band given initial indications that managing interference adds disproportionate complexity.

We are currently [consulting](#) on our proposals for the 6 GHz band, including our approach to making the upper 6 GHz band for both Wi-Fi and mobile services. We welcome engagement with industry on our proposals.

## Satellite

The Welsh Government supported satellite connectivity and in particular would like Ofcom to consider how Direct to Device satellite services could be used to extend mobile coverage to underserved areas in Wales. Similarly, the Scottish Government were supportive of satellite services for rural connectivity and welcomed dialogue with Ofcom on this topic. The Advisory Committee for Scotland suggested that Ofcom should do more to tackle connectivity in Scotland, such as raising awareness to consumers about alternative technology like Low Earth Orbit satellites.

Eutelsat Group and Viasat supported Ofcom's objective to update the Procedures for the Management of Satellite Filings and review the non-geostationary orbit (NGSO) licensing framework. Regarding NGSO licensing framework, Viasat considered that it should focus on specific sharing conditions that are needed at the licensing or market access stage to avoid interference, rather than relying on taking action once interference arises. Eutelsat Group also suggested Ofcom should consider separate authorisations for satellite operators and network operators (who sell and manage satellite terminals to particular sectors) in the UK.

Eutelsat Group and Viasat also supported the proposal to review satellite gateway licence fees policy, though both made a number of additional comments:

Eutelsat Group noted that adopting a regulatory framework and licensing conditions that recognise the particularities of satellite systems (both geostationary orbit (GSO) and NGSO) is key for the satellite industry to grow but urged Ofcom to keep regulatory fees low.

Viasat said that the different approaches for calculating fees for NGSO and GSO gateways leads to a competitive advantage for NGSO operators.

We recognise the role the new satellite services can play in helping to connect rural parts of the UK, alongside terrestrial services. We look forward to engaging with the Welsh and Scottish

Governments on our space spectrum work and how this can benefit consumers and businesses in each of our nations.

We are [consulting](#) on proposals on how to authorise satellite Direct to Device in Mobile bands and would welcome engagement with stakeholders.

We will consult on our NGSO licensing framework to streamline the process for satellite operators. Our NGSO licensing process already includes coexistence checks to avoid harmful interference. We currently have no plans to introduce sharing conditions or new authorisations for NGSO network operators but would welcome further engagement with stakeholders.

We will consult on an updated fee policy for NGSO Gateways, which will include consideration of the difference in the approaches currently taken for NGSO and GSO gateways. We will also seek to ensure that any new fee proposals support the efficient use of spectrum and with that continue to facilitate innovation and growth.

### **Earth Station Network licence**

**Rivada Space Networks GmbH supported Ofcom's plans to consult on granting access to Ka band for satellite terminals on ships and planes and believed any newly released spectrum should be fully allocated to FSS and satellite user terminals.**

**Eutelsat Group welcomed expanding access to the Ku and Ka bands for maritime and aeronautical connectivity, implementing World Communication Conference (WRC)-23 decisions. Separately, it requested that Ofcom adopt ECC Decisions to loosen restrictions on satellite terminals within the 14.25-14.50 GHz band. Eutelsat Group also encouraged Ofcom to consider possible revisions of sharing conditions in the frequency band 13.75-14 GHz to allow the use of uplink FSS earth stations with smaller antenna size, in line with the WRC-27 Agenda Item 1.2.**

We will consult on expanding aeronautical and maritime satellite terminals access to the Ku (12.75-13.25 GHz) and Ka band (27.5-30 GHz), subject to terms and conditions to protect terrestrial services, following developments at WRC-19 and WRC-23.

We do not currently plan to review the use of 14.0-14.5 GHz frequencies this year. We are participating in international discussions on WRC-27 Agenda Item 1.2 regarding the use of small antennas in 13.75-14.0 GHz. We do not currently plan to review UK authorisations for these frequencies prior to the 2027 conference.

### **Gateways in Q/V and E band**

**Viasat welcomed expanding spectrum access for satellite gateways but would like Ofcom to address what it considers to be inadequacies in the existing framework for protection of GSO NGSO systems in Q/V bands and create a new technical framework for the same in E band. It noted that issues are at an early stage of study in the ITU and CEPT, and that it has submitted its own studies for consideration.**

**Eutelsat Group welcomed a consultation on feeder links in higher frequencies including E band. It believes that any new approach to licensing gateway earth stations in the Q/V bands should be based on ensuring access to substantial, contiguous spectrum particularly in the uplink direction for operation of commercial satellite services in the UK. It considers that allowing access to NGSO gateways in addition to GSO gateways will improve the efficient use of this spectrum.**

We will decide on our approach, following consultation later this year, to making additional spectrum available for satellite gateway use in Q/V and E bands and the proposed conditions of use.

We are participating in international discussions about the regulatory framework for Fixed Satellite Services operating at these frequencies. We will consider implications of any new international regulations on our domestic authorisations following WRC-27.

## Utilities sector

**The Joint Radio Company (JRC), Cellnex UK and Ericsson all requested that Ofcom add an additional priority area to its 2025/26 plan of work to support the Government's net zero goals for 2030. They considered dedicated spectrum was needed for a 'smart' energy system with enhanced operational control in the UK. JRC and Cellnex UK also highlighted the need for Ofcom to be ready to act as soon as the Government's direction is clear. In addition, JRC referred to recommendation 27 of the National Infrastructure Commission's (NIC's) second infrastructure assessment which suggested that a telecoms strategy is needed to support the energy, water and transport sectors.**

We recognise the importance of connectivity requirements for the utility sector. Following our 2023 Call for Input which identified candidate spectrum bands to support the utilities sector's future operational communications, we continue to work with the UK Government on potential solutions and will consider the Government's response to the NIC's recommendations alongside this work.



## 5. Cross-cutting areas and underpinning work

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### Growth

Several stakeholders mentioned the role Ofcom, and regulators as a whole, could have in facilitating growth within their sectors. One stakeholder said it welcomes Ofcom's recognition of its growth duty and would be eager to see it updated in relation to regulatory plans to drive growth.

Vodafone suggested that whilst the proposed Plan of Work mentions some projects promoting investment, it could go further. In particular, it highlighted self-build and multi-service public service networks in relation to spectrum fees, and Public Electronic Communications Service providers and tech companies in relation to security standards as areas of focus. It also said that Ofcom should be more mindful of its interventions, bring down the cost of compliance and introduce post-implementation audits to see if the desired outcomes were achieved.

Royal Mail noted Ofcom's reference to the Statutory growth duty but asked for clarity on how this will impact the postal sector.

Wight Fibre asked that Ofcom dedicate resource to work with the telecoms industry to understand how the sector can best assist in the creation of economic growth.

BT stated the importance of underpinning growth via pro-innovation by publishing clear, robust compliance guidance in emerging areas, such as telecoms security and resilience, which would provide greater certainty for industry and aid compliance with the TAR.

TechUK stated that it would welcome further information from Ofcom as to how we will work to implement our new growth duty across our workstreams.

We have always had duties to carry out our functions having regard to the desirability of encouraging investment and innovation and promoting competition, and the growth duty fits well within this framework. We believe that good regulation and economic growth go hand in hand and this is particularly true in times of such rapid technological innovation. In our Statement, we have identified important pieces of work for 2025, which will directly support growth and innovation in our sectors. Because good digital connectivity increasingly underpins the economy, they will also benefit growth more widely.

### Climate Change

Consumer Scotland encouraged Ofcom to develop the telecommunications and postal industries' understanding of climate change issues and to support and contribute to the advancement of net zero objectives.

Wi-Fi Alliance suggested that the Plan of Work should account for UK sustainability priorities.

Dynamic Spectrum Alliance suggests that Ofcom's work on advancing wireless technologies should include policies that encourage green practices, such as deploying low-power devices and reducing the environmental footprint of wireless networks.

The Welsh Government stated that it would like Ofcom to work with all sectors (not just the telecommunication sector) to meet net zero target.

We do not have duties to pursue environmental or climate change policy goals. Nonetheless, we have an interest in the long-term sustainability of the telecoms and postal sectors. This includes their preparation for net zero and climate change impacts, as well as improving their sustainability practices to meet the expectations of investors.

We support industry efforts to reduce emissions, notably through our engagement with the Digital Connectivity Forum's Climate and Sustainability Working Group. Since 2023, we have convened two annual telecoms industry sustainability roundtables, serving as a catalyst for further discussions, including on adaptation strategies.

Additionally, we collaborate with other regulators and the UK Government through forums such as the UK Regulators Network (UKRN) Climate Change Network and the UKRN's Net Zero Regulators-Government Forum.

We remain interested in the industry's environmental metrics and have published a summary of leading providers' decarbonisation targets. We will continue to enhance our understanding of the issues stakeholders face in collecting and reporting environmental and sustainability data.

## Ofcom engagement

**Better Media suggested that there is a lack of transparency in Ofcom's current data reporting and that this limits public accountability and prevents stakeholders from effectively engaging with regulatory processes. It also suggested that there are limited opportunities for grassroots and community organisations to influence regulatory decisions, and that this creates a significant barrier to inclusive policymaking, where accessible platforms and frameworks need to be available to enable diverse feedback on regulatory decisions. Better Media also suggest Ofcom conduct comprehensive equality impact assessments for all major decisions to evaluate their effects on underrepresented groups.**

As an evidence-based regulator, we recognise that transparency and clarity about our decisions are fundamental to building trust. This principle is deeply embedded in our work, especially in our consultations and policy decisions and our approach to data reporting can be found on our [website](#). We strive to publish the evidence we rely on during consultations and decision-making processes. You can find our consultation principles [here](#). We redact information only when disclosure is not justified under section 393(2) of the Communications Act 2003.

Our goal is to make the UK's communications systems accessible to everyone. We consistently consider accessibility, diversity, and inclusion in the areas we regulate. Detailed information about our work in this area is available on our website [here](#).

In relation to equality impact assessments, we consulted on and published a [statement](#) related our approach, which considered equality impact assessments, amongst others.

## General

**The Welsh Government highlighted that as Ofcom's remit evolves it is essential the Wales office has the capacity to respond to these changes.**

We have an extensive programme of stakeholder engagement in Wales, Scotland and Northern Ireland, including working with the devolved governments on joint aims, as we implement the new Online Safety regulatory regime. In Wales we have recently recruited an additional member of staff to help support our work in this area.

Colleagues in Wales, Scotland and Northern Ireland continue to contribute to policy development within Ofcom, flagging relevant issues and feeding in insights that we have gained from our stakeholder engagement in the Nations.

**The Advisory Committee for Scotland asked that the Plan of Work focus more on reporting against the previous plan, highlighting what did and did not work. It also encouraged Ofcom to ensure that the research done by Ofcom reflects all nations and regions so that the data can be broken down by nation subset, that we do more qualitative research and that the Scotland team establishes a public engagement strategy.**

We recognise the importance of reporting against the work that we set out in our annual plan of work. We do this in our [annual report and accounts](#) that we publish every year. Additionally for certain projects we run ex-post evaluations to consider the impact that a new or updated policy may have had.

**The Welsh Government said that it would like to see more evidence of Ofcom's horizon-scanning work.**

Our horizon scanning programme builds our understanding of the sectors we regulate as we aim to anticipate future developments through external engagement, research and analysis. Much of this work begins as internal pieces but where appropriate we do externally share our findings on our [website](#). We also collaborate with other regulators through the DRCF and contribute to the [DRCF's horizon scanning work](#).

**Vodafone stated that it would like to see more regulatory consistency within Ofcom, as well as consistency with Government, co-regulators and international partners.**

We do consider how our regulation fits with other obligations on providers, and recognise that there is value in consistency where possible, but in some instances the legislative frameworks or circumstances are different. We will continue to listen to our stakeholders and work with our partners to set regulation.

**NADP notes the number of partnerships that Ofcom has but said that Ofcom does not engage with a group who represents people with hearing loss. It also mentions how Ofcom used to meet with a collective group of charities with a focus on people with hearing loss but these were disrupted by the pandemic. It would welcome a discussion on how these meetings could resume.**

**NADP would like there to be a minimum quality standard of automated captions introduced for video call services.**

We are always happy to meet with organisations representing deaf people. For example, we attended Deaffest in 2024 and are attending Deaf Day at City Lit in 2025, enabling us to meet a larger number of deaf people face to face.

Regarding standards of automated captions on video call services, we do not have the powers to regulate automated captions on video call services (such as Teams and Zoom), so we are unable to set standards for them<sup>1</sup>.

**In addition, while the NADP notes the progress Ofcom has made with diversity and inclusion, it would also like Ofcom to set specific D&I targets for people with hearing loss.**

Ofcom is a Disability Confident Leading employer with a [Diversity and Inclusion Strategy](#) which outlines our commitment to ensuring representation across all protected characteristics. We have an organisation wide disability representation target of 15%. This target includes colleagues with hearing loss. We do not set specific targets for individual conditions.

At Ofcom, we work hard to ensure all disabled colleagues have fair access to opportunity, including ensuring our reasonable adjustments cater for candidates and colleagues with hearing impairments. We use the “social model” approach to disability in work, including workplace adjustments, thus removing barriers to enable all colleagues to undertake their roles and not requiring individual medical evidence or the reporting of any specific condition.

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<sup>1</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/902879/Government\\_response\\_EECC.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/902879/Government_response_EECC.pdf)