

Your response

Question	Your response
<p>Question 1: Do you have any comments on Ofcom's proposed Work Plan for 2025/26?</p>	<p>Confidential? – N</p> <p>The Advisory Committee for Scotland (ACS) advises Ofcom about the interests and opinions, in relation to communications matters, of persons living in Scotland. The response from the ACS to this consultation draws on the knowledge and expertise of ACS members and is informed by our individual experience and through discussion at our meetings. It does not represent the views of Ofcom or its staff.</p> <p>General comments</p> <p>The 'Our sectors' section of the Plan provides important context for the new plan, and we would ideally see here a clearer performance report against the current plan (what worked; what didn't). One of the four priorities in the draft Plan of Work is 'We live a safer life online'. The indicators for this priority are primarily process-focused ('Set up the online safety regime...'), reflecting the introduction of new online safety duties. In future plans we would encourage Ofcom to set out more outcome-focused indicators (e.g. 'Enhanced trust in the online world...').</p> <p>We note the change to one of key priorities and the inclusion of postal responsibility in 'Internet and post we can rely on'. Unfortunately, we feel that this focus on post is perhaps a bit too late and Ofcom will now be in the role of mitigation rather than positive regulation. We would urge the Scottish team to continue to advocate for all Scottish citizens to ensure a fair and equitable outcome for all discussions around the USO. Relationships with key partners including the Scottish Government and Consumer Scotland will be important to strengthen the Scottish voice and representation.</p> <p>Nations Priorities specific comments</p> <p>We note and welcome the commitment to research 'that is nationally representative across all of the</p>

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	<p>UK's nations and regions.' However, we would urge Ofcom to ensure that the research does indeed reflect all of the UK nations and regions and that this data can then be broken down by nation subset, allowing differences between nations to be highlighted and taken into consideration. We would also suggest that Ofcom use more qualitative as well quantitative research. We feel that this would provide a more balanced understanding of real-life experience of consumers who are negatively and disproportionately impacted by a consistently low standard of digital connectivity. This qualitative experience should then flow through to shape all policy thinking and development.</p> <p>Sitting alongside the research planning we would encourage the Scottish team to establish a public engagement strategy, as part of their plan for the year. There are general references throughout the plan to engagement on postal issues, broadcasting, media literacy and more generally connecting with key stakeholders. The ACS would be interested to see what the engagement plan/strategy is within Scotland, to have the comfort that it specifically ensures the voice of Scottish citizens is represented fairly and properly.</p> <p>As Scotland remains the most challenged nation in relation to connectivity, focus must continue on rapidly addressing our not spots as well as improving on the quality of service in those areas considered to have good coverage. Good coverage must mean a consistent high-level service with options on suppliers at an affordable level. We are pleased therefore to see that the Telecoms Access Review considers the above as one of the top priorities for Scotland. Within this, the challenges of affordability and resilience should be paramount. Additionally, and where appropriate, providing consumers with knowledge of alternative technologies is important.</p> <ul style="list-style-type: none"> • Knowledge of alternative technologies - it is presently left to the consumer to research and understand alternative technologies that can offer a substitute to conventional connectivity solutions in poorly served locations (for example, LEO sat comms). Ofcom should consider

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	<p>how best to ensure underserved and non-expert consumers are aware of alternatives and how they can be accessed affordably.</p> <ul style="list-style-type: none"> Resilience of mobile networks - in many rural locations in Scotland, citizens are choosing and often relying exclusively on 4G mobile connectivity for broadband services over slower speed copper-based DSL landline connectivity. Therefore, any disruption of the mobile service potentially has a greater negative impact on rural communities and should be a key metric collected and reported by Ofcom with emphasis towards ensuring disruption is minimised. <p>The PSM review is an important milestone for PSBs and Scottish audiences. We would urge Ofcom to be wide ranging in their approach to this. The landscape is extremely fast moving, and it will need more than a light touch. The question must be asked – is the current set up fit for purpose and if not, what options are there for the future?</p> <p>The rising cost of content, the questions around terrestrial v digital delivery and the adoption of AI are challenges for all the UK but will directly impact Scottish audiences and the fragile Scottish independent sector. This production sector will be increasingly looking to Ofcom for support and answers as they make the connection between regulation and their future business models. The recent public and political discussion around Traitors and Scottish quotas is an example of a sectors growing interest in Ofcom’s role in their future. Over 80% of commissioning for the Scottish sector comes from the BBC and C4 and therefore how they respond to new licence commitments needs to be a focus for the team in Scotland, ensuring audiences and producers get what they need. The sector is small enough for there to be useful collaboration and the Scotland team should consider how they might help foster that.</p>

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	<p>With regard to online safety and media literacy, the Scotland section of the draft Plan of Work references implementing the online safety regime in a devolved context and eradicating violence against women and girls. It also points to maintaining the quality of public service broadcasting and supporting media literacy initiatives. The Plan notes that 'There are unique challenges, but also opportunities for communication services in Scotland, Wales, Northern Ireland and England' but it does not set out what these nation-specific challenges and opportunities are.</p> <p>We suggest providing more clarity on the issues and Ofcom's plan in Scotland. For example, a key challenge in the devolved context is to address the important legislative distinctions, such as the potential Misogyny Bill. There may also be challenges in industry awareness of (and therefore compliance with) new legislation by businesses in Scotland such as gaming companies and organisations self-hosting message boards or other user-to-user services. Concerns around sextortion and sexual abuse of children in Scotland are growing but this is not reflected as a priority for Scotland in the Plan. In previous responses to consultations on Ofcom guidance, this Committee has called for more research into the Scottish digital experience, including online harms, and better data on the issues faced by rural communities (for example). Ofcom provides useful Scottish data across a number of research publications which shows for example that, although the differences are small, Scots spend more time online every day and see more potential harmful content or behaviour online than other nations (1); and more Scots than any other nation use social media for news (2). We would recommend a curated dataset of Scottish indicators of online life, to support the rationale for Ofcom's choice of priorities in Scotland, and to provide a means of tracking impact of regulation.</p> <p>(1) https://www.ofcom.org.uk/siteassets/re-sources/documents/research-and-data/online-re-search/online-nation/2024/online-nation-2024-report.pdf?v=386238</p>

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	<p>(2) https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/tv-radio-and-on-demand-research/tv-research/news/news-consumption-2024/news-consumption-in-the-uk-2024---scotland.pdf?v=379762</p> <p>Beyond these specific issues, we have a concern that Scottish stakeholders do not recognise the relevance in Scotland of UK regulation such as the Online Safety Act and Media Act. Our online experience influences and is influenced by almost every aspect of life. Ofcom plays a pivotal role in building awareness of the relevance of this legislation, online safety and media literacy, with local stakeholders.</p>

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