

# Ofcom's Plan of Work 2025/26 Consultation: techUK Response

The UK tech sector welcomes Ofcom's plan of work for 2025/26, which demonstrates a strong commitment to fostering innovation, ensuring robust and reliable communication infrastructure, and prioritizing online safety, and we appreciate the opportunity to feed into this important process.

2025 will undoubtedly be a crucial year for Ofcom as the Online Safety Act continues to come into force, and we recognise this will create a significant amount of work for both industry and regulator. Cooperation will be crucial in ensuring the success of the Act, and we look forward to continuing to facilitate engagement between Ofcom and the tech industry to meet these goals.

Some work remains to be done to ensure that the UK remains a global leader for technology, and to secure the government's headline ambition of sustained economic growth. Regulators such as Ofcom have a crucial role to play here in ensuring that the UK has a dynamic and thriving online economy, underpinned by vital connectivity infrastructure.

## Online Safety

2025-26 will be crucial years in Ofcom's commitment efforts in implementing and enforcing the Online Safety Act (2023). We appreciate that, in this and other documents, Ofcom has set out clear timelines for the delivery of regulatory milestones and provided clarity for industry and others. In order to collaborate effectively, we would encourage Ofcom to remain as open and transparent as possible throughout the enforcement process. In areas such as enforcing the fees and penalties regime, there may be a role for independent experts and external auditors to aid Ofcom in its work, and maintain the confidence of industry.

In particular, our members would welcome the publication of greater amounts of the evidence Ofcom has used in reaching its decisions. This would help industry to better understand the process behind Ofcom's decision making, enabling industry in turn to better understand the risks and benefits of Ofcom's proposed approaches, hopefully leading to more informed conversations and increased transparency.

## Age assurance

Age assurance remains a cornerstone of online safety. techUK members recommend that Ofcom collaborate with the Information Commissioner's Office (ICO) and the Digital Regulation Cooperation Forum (DRCF) to conduct a comprehensive review of age assurance methods for users aged 13 and above.

## Age verification

Additionally, our members have suggested that they would benefit from further clarity over what Ofcom considers to be “highly effective” or “effective” methods of age verification. Ideally, in alignment with international standards to ensure consistency across markets.

The upcoming announcement on age verification standards presents an opportunity for Ofcom to provide clarity on what constitutes "highly effective" or "effective" methods. This guidance should align with international standards, such as the forthcoming ISO Part III, to ensure consistency and measurable compliance.

Furthermore, it is important for Ofcom to work with other departments such as the Home Office as they develop their work to implement stricter age-verification checks for all knife retailers as announced recently.

## Connectivity

Ofcom's focus on high-quality and secure networks is a vital foundation for the UK's digital economy. Making sure the right regulatory framework is in place to enable the continued rollout of gigabit-capable broadband, whilst ensuring sustainable network competition for the long term is crucial. Our members will be keen to engage in Ofcom's work around the Telecoms Access Review, to ensure these key markets deliver high quality services for both UK consumers and businesses. The same can be said for the Wholesale Voice Markets Review.

We support Ofcom's commitment to addressing connectivity gaps in rural and underserved areas and promoting competition within the sector. The introduction of satellite and drone technologies, as outlined in techUK's [UK Tech Plan](#), can significantly improve accessibility and drive economic inclusion. Additionally, we endorse Ofcom's efforts to promote interoperability and digital infrastructure investment to ensure equitable access across the country. This includes adopting open and interoperable standards to mitigate supply chain risks, which will help ensure network resilience and backhaul stability.

We also recommend, for mobile networks, the successful implementation of the revised ECC - Electronic Communications Code. This code will be pivotal in transforming the economics of mobile networks, with significant work to do to complete the programme of bringing rents in line with intent via lease renewals over the next 5 – 7 years.

To enable advanced wireless technologies, we recommend prioritising the rollout of Standalone 5G (SA) networks and ensuring equitable spectrum access for sectors like healthcare and agriculture. Maintaining regulatory stability is key to attracting private investment, and we believe the impact of Annual Spectrum License Fees should be subject to ongoing evaluations by the relevant parties.

In 2024, Ofcom took initial steps to review the Annual Licence Fees (ALFs) paid by Mobile Network Operators for specific spectrum bands. Coupled with updates to spectrum policy and licensing, Ofcom has launched the framework to reduce costs and deliver further value to stakeholders.

These regulatory innovations will be key in ensuring that the UK is a leader in shaping and implementing 6G technology. With greater responsiveness, capacity, and security, 6G enables precise IoT, autonomous vehicle, and robotics positioning, enhances energy and transport systems through digital twins, and advances VR in communications, education, and healthcare. Enabling these use cases will require a responsive regulatory system that embodies the market transformations to enable the next generation of broadband.

TechUK members, including network operators, service providers and its broad supply chain are committing significant resource and investment into complying with the Telecommunications (Security) Act 2021. They understand the rationale and importance of this legislation to maintaining integrity within the UK's communication infrastructure, which is crucial part of the modern UK economy.

There are however ambiguities within the wording of the Telecommunications Security Code of Practice, which is creating confusion and differing interpretations within industry.

TechUK would welcome further dialogue both with Ofcom and Government on this to support the sector in streamlined delivery. Further guidance or amendments to the Code would support both regulatory and operational uncertainty, enabling firms to invest confidently while maintaining robust security standards.

techUK has over the past few years been committed to bringing together communication and digital infrastructure providers to raise awareness of the digital landline program and ensure that key stakeholders are aware of the roles they need to play to ensure a smooth

and minimally disruptive retirement of the analogue telephone network. We will continue to work with industry and government to support the safe movement of customers, especially society's most vulnerable, from an aging and increasingly unreliable platform and welcome Ofcom's continued support in this area.

It would be equally useful to consider some of the lessons learnt around the PSTN switch-off process, in the context with plans around the 2G and 3G networks.

### Reducing Fraud

In the area of tackling scam calls and texts, techUK support ongoing work by Ofcom in this area. We agree that collaboration, sharing information and coordinating across sectors is necessary to disrupt fraudulent actors effectively. It's important that the channels of communication between Government, the regulator and industry are working effectively here. There are many well intended initiatives taking place that can often be siloed and therefore hinder a truly joined up approach. Ofcom are well placed to support in this area, and we would welcome further dialogue on this matter.

### Digital Inclusion and Skills

The UK faces a critical shortage of digital skills, with millions at risk of under-skilling for future roles leaving both individuals and the wider economy ill-equipped for the challenges of the future.

Ofcom's Making Sense of Media workstream is conducting important work into media literacy with the aim of improving our ability to spot and understand mis and disinformation. We would urge Ofcom to continue this and other important educational initiatives, such as partnering with educational institutions and other organisations, including the tech sector, to assist with upskilling workers.

As techUK identified in the UK Tech Plan, plugging the digital skills gap through measures such as reforming the apprenticeship levy could see a pay increase for UK workers of up to £5.69 billion.

### Growth

Regulatory stability is in everyone's interest, and we would therefore welcome some further information from Ofcom as to how they will work to implement their new growth duty across their workstreams, such as by encouraging investment in the UK.