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29 January 2025

## **Consultation: Ofcom's Proposed Plan of Work 2025/26**

Thank you for the opportunity to comment on the Ofcom proposed Plan of Work 2025/26. In this response we have provided:

**Section 1:** Introduction to the Trust Alliance Group (Including Communications Ombudsman and the Internet Commission).

**Section 2:** Our response to the Proposed Plan of Work 2025/26.

### **Section 1: Introduction to the Trust Alliance Group (Including Communications Ombudsman and the Internet Commission)**

Trust Alliance Group was established in 2002 and runs a range of discrete national Alternative Dispute Resolution (ADR) schemes across different sectors, including Communications Ombudsman, approved by Ofcom, and the Ofgem-approved Energy Ombudsman.

Our purpose is to build, maintain and restore trust and confidence between consumers and businesses and we're developing diverse capabilities and expertise in a range of areas including digital alternative dispute resolution and case management technology.

**Communications Ombudsman** provides independent dispute resolution services, whilst helping providers understand their customers and improve their experience.

With over 1,450 telecommunications companies signed up to our scheme – and over 15 years' experience in the communications sector – we are one of the ADR schemes approved by Ofcom to impartially and independently handle disputes between consumers and providers.

In 2023 we accepted 25,000 disputes about providers in the communications sector and, using our insight, we continue to help providers improve their customer service.

**The Internet Commission** was acquired by the Trust Alliance Group in 2022 and promotes ethical business practice, to counter online harms and increase platform accountability.

The Internet Commission offers:

- Support to organisations who want to achieve high standards in online trust and safety.
- Knowledge exchange where companies can discuss challenges and solutions related to tackling online harms.
- Analysis and reporting on developments in good practice, governance and procedures relating to the moderation of user-generated content online.

## Section 2 – Our response to the proposed Plan of Work 2024/25

We support the proposed plan of work as set out and the four priorities to be built upon in the forthcoming year: ‘Internet and post we can rely on’, ‘Media we trust and value’, ‘We live a safer life online’ and ‘Enabling wireless in the UK economy’.

We welcome Ofcom’s commitment to ensuring consumers have access to fast and reliable communications networks and services, that deliver choice and value. We particularly support Ofcom’s desire to see consumers treated fairly at every stage of the customer journey, regardless of their circumstances and that consumer protection rules are robust, properly implemented and deliver positive outcomes for consumers.

While support is available to consumers, we know that many people can find it difficult to understand and access. We continue work to improve the accessibility of our own services and will undertake work programmes in 2025 to ensure we reach, understand and speak with communities we feel require additional support and adjustments to access our service. We, therefore, support Ofcom’s commitment to monitor and advance outcomes for vulnerable and less engaged consumers – in line with the UK Government’s Statement of Strategic Priorities for telecommunications, management of radio spectrum and postal services.

Related to this, we welcome the publication of Ofcom’s Review of ADR in the Telecoms Sector consultation. We support Ofcom’s proposals to reapprove Communications Ombudsman as an ADR provider for mobile, broadband and landline services and to reduce the timeframe consumers must wait to access ADR. We look forward to sharing our full response as part of the consultation process and would welcome the opportunity to continue to work with Ofcom on how else we can ensure that everyone who could benefit from ADR has the opportunity to do so.

With regard to making ‘living a safer life online’, we welcome the publication of Ofcom’s new codes of practice and the steps towards the categorisation of services – including the risk assessments guidance to assist platforms in properly understanding the risk their platform could pose to service users.

Through our work with industry, regulators and advocacy groups, we are well placed to provide Ofcom with insight on business best practice, user experience and the efficacy of the various techniques employed to protect people online. The Internet Commission will continue to input evidence to forthcoming consultations relating to the implementation of the OSA and we look forward to working with Ofcom on its successful implementation in the months ahead.

We support Ofcom’s commitment to giving users “meaningful control over their online experiences”. We believe that user access to impartial Digital Dispute Resolution would be one way to help establish this and continue to develop our thinking and evidence base in relation to its potential operation, as part of the OSA.

Such a scheme would allow Ofcom to capture real consumer experiences, provide a more complete overview of issues emerging in digital markets and allow users to challenge decisions they feel to be wrong. As in other markets, such a system would produce valuable insight which would assist Ofcom and providers to drive improvements.

We recognise Ofcom's commitment to remaining an evidence-based regulator and we welcome Ofcom's commitment to ensuring "real-world data" is available to allow consumers to make informed choices. In line with this and in recognising Ofcom's commitment to domestic and international partnerships, both Communications Ombudsman and The Internet Commission look forward to providing data, insight and market intelligence to support your work to make well informed decisions that work for consumers, suppliers and platforms.

Please do not hesitate to contact us if you would like further information regarding our response. Our response is **not confidential**.

For more information regarding this response, please contact:

[Redacted contact information]