

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>General feedback</p> <p>We welcome the recent and upcoming publications made by Ofcom of publication that will form the backbone of the Online Safety Regime and its enforcement from 2025 going forward. We welcome the stated 'shift towards implementing and enforcing' the Regime.</p> <p>We urge Ofcom to collaborate closely with the Information Commissioner's Office (ICO) and the Digital Regulation Cooperation Forum (DRCF) to conduct a comprehensive review of age assurance methods suitable for users aged 13 and above. While much focus has been placed on age verification for adult content, there is a pressing need to ensure that effective and privacy-preserving age assurance measures are in place for younger users accessing mainstream online services. This joint review should evaluate both age estimation and verification technologies, with the goal of providing clear, consistent guidance across sectors and addressing gaps in current regulatory frameworks.</p> <p>Following the upcoming announcement on age verification, we anticipate that key details regarding what constitutes "highly effective" or "effective" age verification, including measurable success rates and re-authentication requirements, may remain unclear. To address this, we recommend that Ofcom provides more specific guidance in line with the forthcoming ISO Part III standards. Clear benchmarks for effectiveness, supported by defined percentages for performance and guidance on when and how users should be re-authenticated, will be critical for ensuring consistent implementation across platforms. This clarity will also help service providers understand how to meet compliance expectations effectively.</p>

Question	Your response
	<p>We would want to see concrete timelines for when Ofcom expects to start taking action and to use its enforcement powers. Indeed, the success and swift adoption of rules by providers largely depends on Ofcom being perceived as effectively enforcing the regime.</p> <p>We encourage Ofcom to adopt supervisory technologies that can be seamlessly integrated into its enforcement and case management systems. Leveraging supervisory tech will enhance Ofcom's ability to monitor compliance, detect non-compliance early, and streamline enforcement actions. This approach would create a more efficient, data-driven regulatory framework, enabling Ofcom to manage complex cases more effectively while ensuring that smaller and medium-sized providers are also held to consistent compliance standards. The use of such technology could significantly improve Ofcom's operational capacity, providing a scalable and proactive model for enforcement across the online safety landscape.</p> <p>There are mentions of 'consultations on additional measures to protect users in Spring 2025' in the consultation document. Given recent changes to Ofcom's enforcement plans requested by the Secretary of State, we think it would be opportune for Ofcom to publish an updated roadmap (such as 'Figure 2: Our timetable for implementing the Act' included in Ofcom's 'Implementing the Online Safety Act: progress update'.</p> <p>Where Ofcom states it is 'already working with services that pose particular risks to ensure they meet their new duties and [is] preparing for [its] initial enforcement programmes', we would like to see more detail as a matter of transparency, and signalling to other services that Ofcom is serious about enforcement. In particular, it would be beneficial to understand what those 'initial enforcement programmes' will consist of, who they will target and on what basis.</p> <p>We welcome Ofcom's participation in the Global Online Safety Regulators Network (GOSRN), however we would flag that in its 'Three Year Strategic Plan Publication 2025</p>

Question	Your response
	<p>to 2027', the GOSRN makes no mention of age assurance. The Plan also lacks any reference to global efforts to develop coherence and standards in online safety regulation. We think Ofcom should continue to push for the development of joint guidance on age assurance by collaborating with the DRCF and other digital regulators globally. We would like to see the publication of unified guidance on acceptable age assurance methods across sectors. We would recommend that digital regulators, under the DRCF umbrella and individually, should also engage with various government departments to promote regulatory consistency that supports consumers and growth.</p> <p>Finally, we have previously called for more transparency about the evidence regulators (including Ofcom) use to underpin their decisions. In particular, we think Ofcom should publish the evidence and metrics used for its claims regarding the performance of online safety technologies. We would want to see regular and accessible transparency reports from platforms that include data on the efficacy of the age assurance technologies they implement.</p>

Please complete this form in full and return to planofwork@ofcom.org.uk