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Consultation Response

Which? response to the Department for Science Innovation and Technology's consultation on the Proposed Statement of Strategic Priorities for telecommunications, the management of radio spectrum, and postal services

Submission date: 18/09/2025

Summary

We welcome the opportunity to respond to the Department for Science, Technology and Innovation (DSIT) consultation on [its draft Statement of Strategic Priorities \(SSP\)](#) for telecommunications¹, the management of radio spectrum and postal services for 2025-2030. This response is focussed on the **telecommunications sector**, and in particular **Strategic Priority 1** ('Driving growth through world-class fixed and wireless digital infrastructure') and **Strategic Priority 3** ('Supporting growth through a transparent, competitive, and fair retail market').

The draft SSP's five-year window is a critical period for the deployment of fixed, mobile, and wireless infrastructure. Reliable, accessible and fast connectivity will be critical for consumers in the UK economy. Additionally, the UK Government has recently set out a vision for the [digitisation of Government and public services](#) which will be catalysed through the connective fibres of resilient, high-performance communications networks². But despite the potential for telecoms services to drive transformation and innovation in both public and private spheres, little sense of a vision or a strong strategic position emerges from the draft SSP.

Our main recommendations are:

Strategic Priority 1: Driving growth through world-class fixed and wireless digital infrastructure

- **Network modernisation:** DSIT must urgently communicate and implement a clear plan for managing the transition from legacy networks (copper, PSTN, 2G/3G) to digital networks. This includes ensuring that consumers have the right information and support to migrate to new digital networks. Ofcom must work with communication providers to proactively identify vulnerable consumers and ensure robust and consistent processes are in place to mitigate the risk of disruption and harm to consumers.

¹ DSIT (2025) [Proposed Statement of Strategic Priorities for telecommunications, the management of radio spectrum, and postal services](#)

² DSIT (2025) [A blueprint for modern digital government](#)

- **Infrastructure reliability and accessibility:** DSIT must proactively support infrastructure reliability and accessibility - raising the Universal Service Obligation (USO) threshold; strengthening Ofcom's Broadband Speeds Code of Practice; and imposing quality of service obligations on mobile networks.
- **Fraud and economic growth:** Fraud represents a major threat to the growth and productivity of the telecoms sector and the wider economy. DSIT must drive a proactive approach from the sector to prevent fraud, and be prepared to take action if it finds the existing legislative framework is ineffective.

Strategic Priority 3: Supporting growth through a transparent, competitive, and fair retail market

- **Customer service:** Ofcom must provide better monitoring and enforcement around customer service. [Which? research finds](#) that UK broadband customers were collectively an estimated £94 million worse off between May 2023- May 2024 due to poor customer service.³
- **Pricing and providers:** Ofcom should formally evaluate the impact of recent changes to mid-contract price rises; and mandate that providers give clear, upfront information at the point of sale about the price customers will pay if they do not recontract once their initial term ends. Ofcom should also adopt a more proactive communication strategy to encourage customers to engage with the market and highlight the advantages of the One Touch Switch process.
- **Affordability:** DSIT must develop a strategic long-term plan to support consumers who struggle to afford connectivity. In the short-term, DSIT must ensure the current voluntary system of social tariffs is proactively communicated to customers by communication providers. According to [Ofcom](#) only 9% of eligible consumers have heard about social tariffs from their provider.⁴
- **Smart Data:** DSIT must urgently commit to a smart data scheme in the telecoms sector.

Conclusion

Consumers must be at the heart of the draft SSP vision as the demand for telecoms services is a critical enabler of economic growth. But telecoms consumers are [strikingly disengaged](#)⁵: the [2024 National Centre for Social Research Consumer Detriment Survey](#) finds that 'internet provision' has one of the highest rates of consumer detriment (24%) across all market sectors surveyed⁶. This issue cuts across both Strategic Priority 1 in relation to network quality, and Strategic Priority 3 relating to the effectiveness of the retail market.

We believe it is important that the government communicates a meaningful long-term vision for confident and engaged consumers in the telecoms sector, reflecting the strategic importance of telecoms to the digitisation of economy and society.

³ Which? (2024) [Consumer harm from poor customer service in the energy and broadband sectors](#)

⁴ Ofcom (2023) [Affordability of communications services: April 2023 update](#)

⁵ Which? (2024) [Why are consumers not switching their broadband and mobile providers?](#)

⁶ NCSR (2024) [Consumer Detriment survey 2024](#)

Full response

Strategic Priority 1: Driving growth through world-class fixed and wireless digital infrastructure

Network modernisation

Recommendation: *DSIT must urgently communicate and implement a clear plan for managing the transition from legacy networks (copper, PSTN, 2G) to digital networks. This includes ensuring that consumers have the right information and support to migrate to new digital networks. Ofcom must work with communication providers to proactively identify vulnerable consumers and ensure robust and consistent processes are in place to mitigate the risk of consumer harm.*

Communicating the consumer benefits of new network technologies

We welcome DSIT's ambition to modernise telecoms networks. We emphasize the importance of communicating the features of new technologies in a way that includes the consumer perspective, and that informs consumers of the practical uses of connectivity packages.

For example, there's [a significant gap](#) between the UK's gigabit broadband coverage (86%) and the take up of full-fibre broadband (38%).⁷ We suspect a key reason for this is that many consumers are still unclear on the tangible benefits of upgrading. A core recommendation of the report published by the [GigaTAG group](#)⁸ in 2021 was: 'Ofcom and industry should [develop common terminology](#) to describe broadband services and a core set of use cases and benefits to be used by providers.'⁹ In 2023, [Ofcom set out new conditions](#) to ensure broadband providers use clear and consistent terminology when describing broadband products to customers.¹⁰ Although this is a positive step, less attention has been given to how providers can inform consumers of relevant use cases and the benefits of ultra-fast connections to consumers. DSIT should therefore work with broadband providers and other stakeholders to develop a strategic plan to improve consumer awareness and understanding of gigabit broadband.

Managing the retirement of legacy networks

We also highlight the importance of managing the retirement of legacy networks as new digital networks are rolled out. With respect to the 2G/3G switch-off and copper network retirement, DSIT and Ofcom must take a proactive approach to ensuring that networks and communication providers are embedding consumer protection in their processes at the earliest opportunity. Ofcom should work with mobile network operators to publish detailed timelines for the switch-off of their 2G networks and ensure robust processes are developed to consult with consumers and relevant stakeholders¹¹. A similar process must be adopted in relation to the copper network retirement.

⁷ Ofcom (2025) [Connected Nations Update: Spring 2025](#)

⁸ Which (2020) [About the Gigabit Take-up Advisory Group](#)

⁹ Which (2021) [Gigabit take up advisory group: final report](#)

¹⁰ Ofcom (2023) [Statement: Improving broadband information for consumers](#)

¹¹ Mobile Network Operators have [committed](#) to switch off their 2G networks by 2033. However, at present, no networks have publicly announced an official date by which these networks will cease to be available in the UK.

The PSTN transition demonstrates the importance of Ofcom and DSIT setting out a clear, coordinated vision from the outset. [Which? research in 2023](#) found that 74% of consumers had not heard about the PSTN switch-off¹²; and [Ofcom estimates](#) that over a quarter (27%) of UK residential landline customers, approximately 5.2 million, were still using the PSTN in December 2024.¹³

Identifying and supporting vulnerable consumers during network transitions

We agree with the draft SSP on the need to protect vulnerable consumers during network transitions. While these modernisations are industry-led, it is crucial that both the government and Ofcom take a proactive role in providing oversight of the process to safeguard consumers.

The experience of the PSTN network transition and the upcoming copper network withdrawal shows that network operators and communication providers need to have robust processes for identifying vulnerable users. As such, Ofcom should work to establish a consistent definition of vulnerability across all communication providers to ensure a more unified and effective approach to support customers.

In addition, Ofcom should explore how it can facilitate data sharing between communication providers and relevant entities such as local authorities and healthcare providers to support these efforts. In the energy and water sectors, the [Priority Services Register](#) offers a multi-organisation view of vulnerable consumers, but no equivalent is operational across telecom providers.¹⁴ Given the critical nature of telecoms services, Ofcom should assess whether facilitating communication provider access to the priority services register would aid efforts to improve support for vulnerable consumers. Ofcom must also proactively engage with vulnerable consumers around their safeguarding, and have robust infrastructure in place to support them during the transition.

Infrastructure reliability and accessibility

Recommendation: *DSIT must proactively support infrastructure reliability and accessibility - raising the Universal Service Obligation (USO) threshold; strengthening Ofcom's Broadband Speeds Code of Practice; and imposing quality of service obligations on mobile networks.*

[We consider the reliability of connectivity services](#) is a key attribute for consumers when comparing internet service providers.¹⁵ The shift to remote work, combined with a growing reliance on e-commerce and digital services, has made access to reliable networks essential for economic participation. The lockdowns in 2020 illuminated the essential nature of reliable connectivity and household consumption of data has risen from an average of [315GB per household per month in 2019](#) up to [531GB in 2024](#).¹⁶ In addition, [the Government's ambitions](#) to deliver high quality digital public services makes access to reliable and affordable connectivity essential for both consumers and citizens.¹⁷

¹² Which? (2023) [PSTN - what is the consumer impact of the switch-off?](#)

¹³ Ofcom (2024) [Connected Nations 2024](#)

¹⁴ [The Priority Services Register](#)

¹⁵ [Which? \(2025\) Best and Worst Broadband Providers](#)

¹⁶ Ofcom (2019) [Connected Nations 2019](#); and Ofcom (2024) [Connection Nations 2024](#)

¹⁷ DSIT (2025) [A blueprint for modern digital government](#).

Universal Service Obligation (USO)

It is essential that the broadband Universal Service Obligation evolves from a static benchmark into a responsive, future-proofed standard. The threshold for the USO needs to be raised to reflect changes in consumer demands and expectations of technology. The last time the USO was [reviewed](#) was in 2016¹⁸. Since then the automatic threshold for a new review – 75% take up of superfast broadband – has been reached¹⁹. The current threshold of 10mbps download and 1mbps upload speeds are not suitable for many essential applications. Ofcom indicated a review would occur in December 2024, but there has been no further details on a timeline or process. DSIT should formally trigger a review of the USO before the end of 2025. Following this, Ofcom should launch a public call for evidence at the earliest opportunity.

Broadband Speeds Code of Practice

Consumers face issues with connections that can cause ongoing harm and frustration. This includes slow speeds or latency issues impacting applications like video calls or streaming services. [Which? research finds](#) that 85% of customers have experienced an issue with their connection in the past year with slow download/uploads (28%) and very slow speeds (26%) being the most common issues.²⁰ The [Broadband Speeds](#) Code of practice offers consumers the right to exit their contract penalty-free if speeds aren't fixed within 30 days.²¹ At present, this scheme is voluntary - meaning that while most of the largest providers have signed up, not all communication providers are required to meet these conditions. In light of the increasing digitisation of the economy and society, and government's on ambition for digital public services, we think there are grounds for making these commitments mandatory so Ofcom can ensure that all providers are covered.

Mobile connectivity

On mobile connectivity the UK lags behind major economies in the deployment of 5G infrastructure. The [Social Market Foundations 5G Connectivity index](#) placed the UK at the bottom of a 15 country ranking for overall 5G performance.²² UK consumers have the lowest 5G download speeds – 118Mbps – and access to a 5G connection just 8% of the time. Although the draft SSP identifies a key priority in relation to investment in 5G networks it does not provide much guidance as to how Ofcom could incentivise 5G investment.

Currently, each of the major UK mobile network operators is subject to coverage obligations as a condition of their spectrum licences. However, there are no equivalent obligations relating to the quality of coverage, such as minimum speed, latency, or reliability standards. This stands in contrast to approaches adopted elsewhere in Europe. [In Germany](#)²³ and [in France](#)²⁴ regulators have imposed not only geographic coverage requirements but also quality-of-service obligations to ensure that end-users experience consistent performance rather than just theoretical coverage. If the ambition of the draft SSP is for the UK to have world-class wireless digital infrastructure, then it is essential that obligations on quality of coverage be placed on mobile network operators.

¹⁸ Ofcom (2016) [Achieving decent broadband connectivity for everyone](#)

¹⁹ Ofcom (2024) [Connected Nations 2024](#)

²⁰ Which? (2025) [More than eight in 10 broadband customers hit with connection issues in last year Which? Reveals](#)

²¹ Ofcom (2022) [Codes of Practice](#)

²² Social Market Foundation (2025) [Growing connections: The challenges and opportunities of achieving ubiquitous 5G mobile connectivity in the UK](#)

²³ Bundesnetzagentur (2024) [Consultation on extending mobile spectrum usage rights](#)

²⁴ Arcep (2019) [Draft Decision proposing the procedure for awarding the 3490 - 3800 MHz band in Metropolitan France](#)

Fraud and economic growth

Recommendation: *Fraud represents a major threat to growth and productivity of the telecoms sector and in the wider economy. DSIT must drive a proactive approach by the sector to prevent fraud, and be prepared to act further if it finds the existing legislative framework is insufficient.*

Fraud is a serious and widespread source of acute consumer harm. [UK Finance has estimated](#) that consumers lost £450 million to authorised push payment fraud in 2024 across 185,733 cases. Although case and loss numbers fluctuate year on year, there is a general upward trend: in 2020 £420 million was lost across 154,614 cases.²⁵ This represents a 7% increase in losses and a 20% increase in cases during that period. The telecoms sector plays a consequential role in the wider fraud supply chain. [UK Finance reports](#) that 16% of authorised push payment fraud cases were enabled by telecoms services in 2024, accounting for 36% of fraud losses by value, some £160 million.²⁶ This money often leaks out of the UK economy entirely, to the detriment of productive British firms.

Fraud also causes damage to consumer wellbeing, which can have knock-on effects for productivity. [Which? research from 2023](#) found that being a scam victim is associated with significantly lower levels of life satisfaction, lower levels of happiness, and higher levels of anxiety. We estimate that this lower level of life satisfaction is equivalent to an average impact of £2,509 per victim, when valued using an approach in HM Treasury's guidance on wellbeing analysis. With 3.7 million incidents of fraud experienced in 2019-20, we estimate that the total losses in wellbeing associated with fraud victimisation amount to £9.3 billion per year.²⁷

For telecoms specifically, fraud can have a negative impact on trust in the telecoms sector and on the effectiveness of telephone marketing. [Ofcom research](#) shows that a majority of consumers (62% for landline calls and 68% for mobile calls) do not always answer the phone, even when they could easily do so, with the most common reason cited being 'I don't want to deal with marketing calls/spam/suspicious callers.'²⁸ PXC - part of the TalkTalk Group - wrote in [its evidence submission](#) to Ofcom's consultation on tackling scam calls from abroad that consumers are less likely to answer calls as a consequence of fraud concerns, which ultimately harms the reputation of the telecoms industry.²⁹ Declining trust due to fraud concerns could undermine the effectiveness and efficiency of the telephony system and result in a loss of business when customers do not answer legitimate calls.

It is clear therefore that, while the telecoms sector can be a major driver of growth and productivity, its substantial contribution to the UK's fraud epidemic can also serve as a drag on growth on productivity. In order to address this, the government must drive a proactive approach by the sector to prevent fraud. It should do this by providing the sector with concrete regulatory incentives to prevent fraudsters from using telecoms networks to attack consumers at scale.

²⁵ UK Finance (2025) [Annual Fraud Report 2025](#)

²⁶ UK Finance (2025) [Annual Fraud Report 2025](#)

²⁷ Which? (2023) [Scams and subjective wellbeing](#)

²⁸ Ofcom (2024) [Experiences of suspicious calls, texts and app messages](#)

²⁹ PXC (2024) [Reducing scam calls from abroad which spoof UK mobile numbers: Options for addressing consumer harm](#)

The approach hitherto has been somewhat piecemeal. While Ofcom has introduced requirements for regulated providers to block unverified calls which are spoofing UK landline numbers, no such requirements currently exist for calls spoofing UK mobile numbers. We appreciate that [Ofcom is currently consulting](#) on potential requirements to display such calls as withheld,³⁰ and that there are technical reasons why blocking such calls would not be appropriate, but the difference in the way that spoofed landline calls and spoofed mobile calls are treated will leave a gap that fraudsters will attempt to exploit. The government should therefore work with industry to address ways in which this gap can be addressed, whether that is through consumer awareness campaigns or other kinds of joint industry action.

Moreover, though Ofcom shares a list of numbers that will never be used for outgoing calls with telecoms operators (the 'DNO list') so that operators can block outgoing calls from those numbers, the use of this list is not currently mandatory, meaning industry lacks incentives to proactively address fraud and consumers are facing a protection lottery based on which provider they happen to use. [We have previously called for](#) the use of the DNO list to be mandatory, as enforcing its use would likely make consumers safer from fraud.³¹ The government should work with Ofcom to help make use of this list mandatory, and in the meanwhile it should use its convening power to put pressure on industry players who do not currently use the DNO list to do so.

The government should work with Ofcom to ensure that the regulator's forthcoming statement on preventing mobile messaging scams provides operators with concrete incentives to block fraudulent communications. Possible measures could include standardising network volume limits to prevent large scale scam text campaigns, as well as policies to clamp down on fraudsters spoofing SenderIDs in order to impersonate trusted institutions.

We are also anticipating that the next telecommunications fraud charter will be agreed between the Home Office and telecoms firms in the coming months. Given that the charter will include numerous voluntary initiatives (including intra-industry data sharing) agreed between industry and government to prevent fraudsters from using telecoms networks to target consumers, it is strange that there is no mention of it in the draft SSP, nor of the government's forthcoming fraud strategy. The government must ensure that there is coordination between the work being done to combat fraud within the Home Office, and broader telecoms work being undertaken within DSIT. As we have argued above, combating telecoms fraud will positively contribute to both growth and productivity within the sector and the draft SSP should acknowledge this.

Finally, the current draft SSP places the onus on Ofcom to identify and address the vulnerabilities in telecoms networks, and makes no mention of the possibility of emerging threats or of the potential need to review the existing regulatory framework. While we agree that there is more that Ofcom can do (which we have outlined above), there is also a role for the government to play in horizon scanning for new threats and conducting an assessment of whether the existing regulatory regime is fit for purpose. Fraud represents a major threat to both economic growth and productivity in the telecoms sector and the government should be prepared to act further if it becomes clear that the existing framework is not sufficient to tackle the full scale of the problem.

³⁰ Ofcom (2025) [Consultation: Tackling scam calls from abroad](#)

³¹ Which (2023) [Ofcom's approach on Calling Line Identification and the prevention of spoofed numbers - Which? response](#)

Strategic Priority 3: Supporting growth through a transparent, competitive, and fair retail market

Customer service

Recommendation: *Ofcom must provide better monitoring and enforcement around customer service, particularly in relation to broadband services.*

The draft SSP raises customer service as an important area for Ofcom to focus on. Ofcom's [2025 Comparing Customer Service report](#) indicates improved satisfaction with complaints handling in the sector, but this has not led to a reduction in the overall volume of complaints.³² It is crucial to address the persistently high volume of complaints, in addition to maintaining and improving satisfaction with how complaints are handled.

There is a consistent body of evidence that highlights issues with customer complaints, particularly in relation to broadband services. [Ofcom complaints data](#) from Q1 2025 shows an average of 10 complaints per 100k subscribers in broadband compared to only 2 complaints per 100k subscribers for pay-monthly mobile.³³

Which? has highlighted issues with specific broadband providers, including [through its 'Shoddies' awards](#) which highlighted Virgin Media's poor performance on customer service three years in a row.³⁴ [Our research finds](#) that the broadband sector is among the worst performing sectors for customer service³⁵. [Research also found](#) that broadband customers are an estimated £94 million worse off due to poor customer service in the period May 2023 to May 2024.³⁶ This figure represents customers who were £89 million worse off due to giving up speaking to their broadband provider and customers who were £6 million worse off due to not contacting their provider due to a previous bad experience.

Data from other sources supports these findings: [Citizens Advice \(2025\) reported](#) assisting double the number of customers with mobile and broadband issues in 2024 compared to 2020.³⁷ The [2024 National Centre for Social Research Consumer Detriment Survey](#) indicates that 'internet provision' has one of the highest rates of consumer detriment (24%) across all market sectors surveyed.³⁸ The [Communications Ombudsman \(2024\) experienced](#) a 54% increase in complaints during the first half of 2024 compared to the same period in the previous year³⁹. Collectively, the evidence points to an underlying problem concerning questionable practices by some providers and high levels of customer complaints. It is urgent to take action before it deteriorates further by 2030.

³² Ofcom (2025) [Comparing Customer Service](#)

³³ Ofcom (2025) [Report: Complaints about broadband, landline, mobile and pay-TV services](#)

³⁴ Which? (2025) [The Which? Shoddies 2025](#)

³⁵ Which? (2025) [Broadband companies' customer service: Who is failing consumers?](#)

³⁶ Which? (2024) [Consumer harm from poor customer service](#)

³⁷ Citizens Advice (2025) [Troubleshooting the broadband and mobile phone markets: insights from the Citizens Advice frontline](#)

³⁸ NCSR (2024) [Consumer Detriment survey 2024](#)

³⁹ Communications Ombudsman (2024) [Communications Ombudsman releases updated complaints data for 2024](#)

To address these issues, we believe Ofcom should enhance its public reporting of customer service data. [Ofcom reports publicly](#) on telecoms customer complaints each quarter, but these statistics only cover reports made directly to Ofcom, not those made by customers to their provider or to approved ADR (alternative dispute resolution) schemes.⁴⁰ To ensure Ofcom has a comprehensive picture of complaints across the sector the regulator should collect this data directly from communications providers.

Ofcom's primary metric — a ratio of complaints per 100,000 subscribers — can create a misleading perception of performance, particularly for providers with smaller customer bases where a few complaints can heavily skew the ratio. To present a fairer and more complete picture, Ofcom should explore supplementary reporting methods, such as including the absolute number of complaints or tracking the percentage change over time.

In addition, Ofcom should find ways to capture the experiences of customers who don't make it through to the complaints process, for example commissioning research to track how many people give up or avoid contacting their provider altogether. Ofcom should also hold providers accountable for missing resolution opportunities. This should include requiring providers to track and report on 'abandoned' customer contacts (where people drop out before resolution), so the scale of unresolved issues is visible.

Further issues with assessing complaints resolution in broadband are demonstrated by the indicators that providers measure, such as how quickly they pick up the phone, rather than how long it actually takes to resolve the complaint end-to-end. For many customers, resolution can take days or weeks, involving long waits, being passed from person to person, lack of resolution, or even being supplied with incorrect information. Collecting provider-level data on how quickly (end-to-end) and effectively complaints are genuinely resolved would give a much clearer picture of performance.

Affordability

Recommendation: *DSIT must develop a strategic long-term plan to support consumers who struggle to afford connectivity. In the short-term, DSIT must ensure the current voluntary system of social tariffs is proactively communicated to customers by communication providers. [Ofcom finds](#) that only 9% of eligible consumers have heard about social tariffs from their broadband provider.⁴¹*

Under the draft SSP's Strategic Priority 1, 'Driving growth through world-class fixed and wireless digital infrastructure', we highlighted the importance of reliable connectivity services in the digitisation of economy, society and public services. It is vital that low income consumers are not excluded from the digital economy, digital society, and digital public services because they cannot afford connectivity.

But the draft SSP's recommendations on affordability lack any sense of ambition. The draft refers to Ofcom's responsibility to monitor affordability within the market, but it does not provide substantive detail on the steps the regulator could take to ensure the market remains affordable for consumers. This is vital for achieving the [government's broader digital inclusion agenda](#).⁴²

⁴⁰ Ofcom (2025) [Telecoms and Pay-TV Complaints Background and Methodology](#)

⁴¹ Ofcom (2023) [Affordability of communications services: April 2023 update](#)

⁴² DSIT (2025) [Call for Evidence Outcome: Digital Inclusion Action Plan](#)

Significantly, the draft SSP offers no clear suggestions to assist consumers unable to afford connectivity. The draft asks the regulator to consider how it can tackle digital exclusion but does not provide detail on what this might look like.

A renewed effort is required from communication providers (CPs), Ofcom and the Government to actively promote social tariffs. CPs have an important responsibility to increase consumers' awareness, yet [only 9% of eligible consumers report](#) hearing about social tariffs from their provider⁴³. Closing this awareness gap is important as [a Which survey found](#) that a significant minority, 45% were previously unaware of these cheaper deals⁴⁴. When consumers were informed, 51% reported they were likely to make the switch.

At a minimum, we believe that additional measures should be explored to ensure that providers communicate relevant information to eligible customers. This may include enhancing the existing voluntary arrangements, for example through a charter or pledge agreement with CPs. However, voluntary measures must be underpinned by robust and transparent governance and clear accountability measures.

Transparency must also extend to public information about the uptake of social tariffs. Previously, [Ofcom reported this](#) on a quarterly basis, but the last public update was in December 2024.⁴⁵ Ofcom should resume quarterly data releases and explore options to enhance transparency reporting, such as including uptake data on a per provider basis.

[Which? research finds](#) that other barriers to signing up to social tariffs include concerns about speeds and quality⁴⁶. However, consumers who articulate these concerns are likely influenced by preconceptions about whether a social tariff will meet their needs. [Qualitative research with consumers](#) found that although some participants had concerns about speeds prior to signing up, once they had done so they were 'pleasantly surprised' by the overall service quality.⁴⁷ This suggests that beyond raising awareness, consumer information needs to highlight the benefits and address potential concerns with social tariffs, particularly in relation to speed and quality.

If the voluntary system of social tariffs is not sufficient for [strengthening digital inclusion](#) for consumers who struggle to afford connectivity⁴⁸, then the government must also develop a longer-term strategic plan.

Pricing and providers

Recommendation: *Ofcom should formally evaluate the impact of recent changes to mid-contract price rises; and mandate that providers give clear, upfront information at the point of sale about the full price customers will pay after their initial contract ends. Ofcom should also adopt a more proactive communication strategy to encourage customers to engage with the market and highlight the advantages of the One Touch Switch process.*

⁴³ Ofcom (2023) [Affordability of communications services: April 2023 update](#)

⁴⁴ Which? (2023) '[Broadband social tariffs research](#)'.

⁴⁵ Ofcom (2024) [Connected Nations 2024](#)

⁴⁶ Which? (2023) '[Broadband social tariffs research](#)'.

⁴⁷ Which? (2023) '[Are social tariffs in connectivity up to scratch?](#)'

⁴⁸ Which? (2025) [Which response to DSIT Digital Inclusion Action Plan](#).

Mid-contract price rises

Which? [strongly advocated](#) for the introduction of new rules requiring providers to set out the value of in-contract price increases in pounds and pence⁴⁹. And so we welcome the decision by Ofcom to [ban inflation linked mid-contract price rises](#).⁵⁰

But it is disappointing that in some instances providers have used them as an opportunity to impose even steeper price rises on customers. We are also concerned if price rises disproportionately impact customers on cheaper tariffs relative to more expensive packages. This is especially salient as [customers on the lowest incomes](#) will spend nearly four times more of their disposable income on fixed broadband compared to an average household.⁵¹

Which? analysis of broadband packages found that an equal absolute increase across tariffs resulted in notable variation in the relative level of price rises. Analysis undertaken in September 2025 finds that Vodafone has among the highest relative increases when comparing the cheapest tariff ⁵² (£23) and the most expensive (£60). An increase of £3 to the core subscription price represents a 13% increase for the cheapest package but a 5% increase for the most expensive package.

We also see the same trend across mobile. A £1.80 increase with O2 on a 24 month, sim-only, 6GB Classic tariff (£16) represents an 11% increase whereas the same price rise applied to the Unlimited data, Ultimate tariff (£42.49) represents a smaller 4% increase.⁵³

Ofcom should continue to monitor pricing practices and be prepared to act if there is persistent evidence that the impact of these new rules have a disproportionate effect on consumers on cheaper tariffs. We note that price rises applied in this way appear to be in tension with Ofcom's [fairness for customers commitments](#)⁵⁴, in particular that 'Customers get a fair deal, which is right for their needs. Providers offer customers packages that fit their needs and have a fair approach to pricing.' In light of this, we recommend that Ofcom should formally evaluate the impact of recent changes to mid-contract price rises.

Pricing

We agree that Ofcom should monitor differences in gigabit pricing between geographies and localities. We have been concerned that some gigabit/FTTP providers are using introductory offers to attract customers to sign up, only to increase prices substantially once a customer's initial contract term has ended. We have found examples where providers initially offer large discounts, but increase prices by up to 100% once the minimum contract term ends⁵⁵. This is particularly concerning in circumstances where a household can only access a single gigabit-capable provider. Such a steep increase is difficult to justify and creates a 'downgrade trap,' forcing customers to either accept a disproportionate price hike or switch back to a lower-quality, copper-based service. To prevent this, and in line with Ofcom's [fairness commitment](#) that 'Prices are clear and easy to understand'⁵⁶ Ofcom should mandate that providers give clear, upfront information at the point of sale about the full price customers will pay after their initial contract ends.

⁴⁹ Which? (2023) [The Right to Connect](#)

⁵⁰ Ofcom (2024) [Ofcom bans mid-contract price rises linked to inflation](#)

⁵¹ Ofcom (2024) [Affordability of communications services](#)

⁵² Not including social tariffs

⁵³ Prices accessed via provider websites on 17th September 2025

⁵⁴ Ofcom (2023), [Fairness for Customers commitments](#)

⁵⁵ Which? (2025) [New broadband price rises: How much will your provider hike prices in 2025?](#)

⁵⁶ Ofcom (2023), [Fairness for Customers commitments](#)

We also note that in the broadband market, several providers coalesced around the same level of price increase, despite their different price points within the market. Vodafone, Plusnet and Talk Talk customers have all seen £3 increases to their monthly bills – the same level as market leader BT.⁵⁷ The similarity in price rises across competing providers raises questions about the effectiveness of competition in the market. We would welcome clarity from Ofcom on how it views this practice [considering the outcome to deliver](#) 'efficient and sustainable markets where competition delivers choice, value and high quality services.'⁵⁸

Supporting consumer trust in new providers

We agree that fostering consumer trust in emerging providers is a valuable objective. Our [Best of Broadband](#)⁵⁹ and [Best of Mobile](#)⁶⁰ surveys consistently show that newer challenger brands frequently provide high-quality services and customer support. However, as there is often a degree of inertia among some consumers, Ofcom should adopt a more proactive communication strategy to encourage customers to engage with the market and highlight the advantages of the One Touch Switch process.

Smart data

Recommendation: *DSIT must urgently commit to smart data in the telecoms sector*

We are disappointed that the draft SSP questions the desirability or feasibility of a Smart Data scheme for the telecoms market. We [strongly support](#) a proposed smart data scheme for the telecoms sector.⁶¹ Greater productivity and competition benefits enabled by personal data mobility across the UK economy was estimated in 2018 to [increase UK GDP by £27.8bn](#).⁶² [Which?'s 2024 paper 'Consumer Policy for Economic Growth'](#) noted that by improving access to high-quality data and enabling secure data sharing, such schemes can stimulate innovation, open up new market opportunities, and improve competitiveness across sectors.⁶³ For consumers, [Which? has found](#) that smart data schemes could have a positive effect on many important markets - providing consumers with easier access to their data and the ability to share it with third parties could significantly reduce the costs of making informed decisions, and in this way improve competition and innovation. The Competition & Markets Authority [has recently identified](#) how price transparency schemes, as a subset of smart data schemes, may be particularly beneficial to consumers.⁶⁴

The experience of Open Banking shows how measures initially designed for a narrow purpose, such as bank switching, can unlock much broader value, enabling fintech firms to develop entirely new products and services, attract significant private investment and create thousands of skilled jobs. [Which? also found](#) that for small and micro businesses, greater data mobility can level the playing field, allowing them to compete alongside larger incumbents, enter new markets, and collaborate across sectors.

⁵⁷ In July 2025, BT announced they are increasing their prices to £4 for broadband contracts. We will be monitoring other providers to assess how they respond in relation to their own pricing practices.

⁵⁸ Ofcom (2025) '[Consultation Plan of Work 2025/26](#)'

⁵⁹ Which? (2025) [Best and worst broadband providers 2025](#)

⁶⁰ Which? (2025) [Best and worst mobile networks 2025](#)

⁶¹ Which? (2023) '[Which? response to DSIT consultation 'Open Communications: a Smart Data scheme for the UK telecoms market](#)

⁶² DCMS, Ctrl-Shift (2018), '[Data Mobility](#)'

⁶³ Which? (2024), '[Consumer Policy for Economic Growth](#)

⁶⁴ Competition and Markets Authority (2025) [Smart data and price transparency schemes](#)

Streamlined data access can also improve operational efficiency, reducing administrative burdens and freeing resources for growth.⁶⁵ The public sector stands to benefit too, with data sharing already helping to make services such as tax collection faster, more accurate, and more cost-effective.

In 2020 Ofcom consulted on introducing Open Comms (the telecoms sector smart data scheme) and [announced its next steps in 2021](#).⁶⁶ At that time, Ofcom committed to trying to achieve progress in the telecoms sector around enabling people to engage with the market more easily (for example through end-of-contract notifications helping customers get better deals) before relevant legislation for smart data was introduced.⁶⁷ But there is little indication this progress has been achieved effectively. An [ex post evaluation](#) of the impact of mobile annual best tariff notifications and end-of-contract notifications (ECNs) found that ECNs had a small and mixed impact on recontracting and a slightly negative impact on switching overall⁶⁸. This signals the necessity of implementing the new Data (Use and Access) Act for smart data in the telecoms sector.

The promotion of greater levels of engagement in telecoms is important given lower levels of switching in these markets. [Which? analysis \(Feb 2024\)](#) shows that switching rates for telecoms are low at 10% in broadband and 15% in mobile.⁶⁹ Since September 2024 a new One Touch Switching process has been in operation to encourage easier consumer switching between broadband providers. In September 2025, [Ofcom](#) and the [One Touch Switching Company](#) reported that 1.6 million switches had been processed through the OTS platform. However, it remains uncertain how many of these switches can be attributed directly to the new process itself or how migration activity is distributed across providers⁷⁰. As such, [it remains uncertain](#) how significant an impact the OTS process has had and will continue to have on consumer engagement with the broadband market.

With respect to Smart Data, it is important to recognise that delays and setbacks in implementing a scheme within the telecoms sector will diminish the potential impact and benefits of smart data across the economy and society. Many of the opportunities around data mobility to improve competition, innovation, efficiency and quality across the economy depend on data being shared across sectors, and not only within a sector. Consequently, the absence of well-functioning smart data schemes in such a large and strategic sector as telecoms will limit the ambition of smart data for the UK as a whole.

Conclusion

Consumers must be at the heart of the draft SSP vision as the demand for telecoms services is a critical enabler of economic growth. But telecoms consumers are [strikingly](#)

⁶⁵ Which? (2024) '[Consumer Policy for Economic Growth](#)'

⁶⁶ Ofcom (2021) [Update on Open Communications: Enabling people to share data with innovative services](#)

⁶⁷ Ofcom (2021) [Update on Open Communications: Enabling people to share data with innovative services](#)

⁶⁸ Ofcom (2024) [An ex-post evaluation of mobile annual best tariff notifications and end-of-contract notifications](#)

⁶⁹ Which? (2024) [Why are consumers not switching their broadband and mobile providers?](#)

⁷⁰ ISP Review (2025) [Ofcom Celebrate as 1.6 Million UK People Switch Broadband or Phone via OTS UPDATE](#)

[disengaged](#)⁷¹: the [2024 National Centre for Social Research Consumer Detriment Survey](#) finds that 'internet provision' has one of the highest rates of consumer detriment (24%) across all market sectors surveyed⁷². This issue cuts across both Strategic Priority 1 in relation to network quality, and Strategic Priority 3 relating to the effectiveness of the retail market.

We believe it is important that the government communicates a meaningful long-term vision for confident and engaged consumers in the telecoms sector, reflecting the strategic importance of telecoms to the digitisation of the economy and society.

About Which?

Which? is the UK's consumer champion, here to make life simpler, fairer and safer for everyone. Our research gets to the heart of consumer issues, our advice is impartial, and our rigorous product tests lead to expert recommendations. We're the independent consumer voice that works with politicians and lawmakers, investigates, holds businesses to account and makes change happen. As an organisation we're not for profit and all for making consumers more powerful.

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⁷¹ Which? (2024) [Why are consumers not switching their broadband and mobile providers?](#)

⁷² NCSR (2024) [Consumer Detriment survey 2024](#)