

# 2025/26 Workplan

April 2025



Digital Regulation Cooperation Forum



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## Chair's foreword

AI and revolutionary technologies have the potential to profoundly impact our society and economy. We are already seeing how AI can revolutionise the operation of business and government - unlocking productive capacity, allowing people to focus on more impactful work, and saving taxpayer money. Leaps in quantum computing continue to expand the supercomputing frontier with potentially seismic opportunities in supporting healthcare, drug discovery, and the future of advanced AI. And the progress of Smart Data offers consumers and businesses the prospect of greater control over their information, enabling more informed choices with ease and convenience and access to innovative products across sectors like finance, energy, and telecoms.



Seizing these opportunities, and the benefits they can yield for the UK, requires a clear and proportionate regulatory environment – one where businesses have the confidence to invest and innovate, and consumers have the confidence to adopt and engage with new technology. All regulators are currently considering how they can contribute to this environment, while upholding the interests of UK citizens. The challenge is particularly acute in the digital space, where technologies transcend traditional boundaries and remits, increasing complexity and uncertainty. This is where the Digital Regulation Cooperation Forum (DRCF) must come in.

DRCF can support businesses and consumers by coordinating and collaborating to deliver clear, proportionate digital regulation geared toward supporting innovation and growth while maintaining the trust of consumers. Our three-year vision sets out how we intend to achieve this mission; in particular, helping the UK stand out as an attractive place to innovate which is the theme of my tenure as chair.

Digital regulation continues to evolve at pace. Since our 2024/25 Workplan, online safety regulations have come into force, the first Strategic Market Status investigations have been launched under the new digital-markets competition regime, and the Data (Use and Access) (DUA) Bill has begun its progress through Parliament. Against this backdrop, the government has made clear its mission to drive growth across the UK through both a modern Industrial Strategy and an AI Opportunities Action Plan. Both rightly emphasise the core role for digital and advanced technologies.

The DRCF recognises that co-ordination of the complex regulatory landscape is an ever more critical factor in the UK achieving these goals. We are committed to working together across our remits to collaborate, innovate, and provide the requisite clarity and certainty to businesses and investors.

We will use our combined expertise and experience to support the government in delivering its policy objectives, particularly leveraging AI and industrial strategy to unlock digital innovation, productivity and economic growth. We will continue our pioneering international approach to regulatory coordination, navigating the evolving global landscape by sharing best practice and taking lessons from our overseas counterparts. And - because engagement and listening are vital - DRCF will build on its strong track record of outreach and engagement with industry, government, Parliament and civil society.

As incoming Chair of the DRCF, I am proud to present the DRCF's 2025/26 Workplan, which provides more detail on our plans for the coming year. This includes exciting work in areas including digital identity, the data economy and Smart Data, research on digital and economic growth, and continued proactive support for innovation leveraging the AI and Digital Hub. I am confident members of the DRCF will continue to work closely and productively together to achieve our mission of a digital regulation ecosystem that effectively supports innovation and economic growth.

Sarah Cardell  
CEO CMA and DRCF Chair

# Introduction

The DRCF brings together four UK regulators - the Competition and Markets Authority (CMA), the Office of Communications (Ofcom), the Information Commissioner's Office (ICO), and the Financial Conduct Authority (FCA) - to coordinate their approach to digital regulation for the benefit of both people and businesses online. As a non-statutory forum, we enable member regulators to collaborate on overlapping and shared digital regulation issues. The DRCF's primary goals are to enhance regulatory coherence, foster collaboration on shared challenges, and build collective expertise for effective regulation.

Alongside this, last year we set out our three-year vision which comprises five key elements:

- Protecting & empowering people online
- Unlocking digital innovation & economic growth
- Supporting regulator effectiveness
- Leading domestic & international discussions
- Anticipating future developments

Regulatory cooperation continues to be an important catalyst for the UK's critical focus on growth and innovation in the digital sector. Each regulator has set out its individual approach to promoting growth with references to past and ongoing DRCF activities.<sup>1</sup> The regulators highlighted how they are providing meaningful business support including for innovation, unlocking markets, identifying opportunities for growth, and actively reducing the costs of regulation for firms.

In January 2025, the Department for Science, Innovation and Technology (DSIT)'s AI Opportunities Action Plan set out a vision for AI adoption which includes driving economic expansion, creating future-proof jobs, and transforming everyday life. The DUA Bill, introduced in October 2024, is unlocking new avenues for innovation through Smart Data legislation and secure digital identity services, ensuring trust and data protection remain at the core. Meanwhile, the digital markets competition regime, which came into force on 1 January 2025, opens up opportunities for the CMA to safeguard consumer interests and promote innovation and investment in the UK technology ecosystem. The implementation of the Online Safety Act, which makes companies operating online services legally responsible for keeping users safe, and the FCA's duties and activities regarding digital financial markets, are positioning the UK as a global leader in digital innovation.

The DRCF will play a key role in explaining how these regulations interact, simplifying compliance to reduce burdens on business and promoting a fair, competitive environment for digital firms across the economy. This document first sets out how we will continue to achieve our three-year vision, then details how we gathered input on where the DRCF should focus its work for the year, before outlining our projects and activities for 2025/26.

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<sup>1</sup> [Ofcom](#), [ICO](#), [FCA](#) and [CMA](#)

# Continuing to achieve our three-year vision 2024-2027



This year, our Workplan activities will support our longer-term vision by ensuring the protection and empowerment of people online through fraud prevention, online safety initiatives, and promoting the responsible development and deployment of AI.

We will foster digital innovation and economic growth through further support for the development of innovative products and services as well as by convening on digital identity.

Regulator effectiveness will be strengthened by supporting the development of regulators' AI skills and capabilities, and aligning on issues related to online safety, data protection, and competition in digital markets.

The DRCF will continue to collaborate with domestic and international regulators, to foster global regulatory cooperation and further contribute to thought leadership on digital issues.

Finally, DRCF regulators will stay ahead of future digital developments and ensure we have the insights to adapt to an evolving technological landscape through horizon scanning, innovation trends and emerging technology research - including into the future of cybersecurity, agentic AI and Smart Data.

## Preparing this Year's Workplan

In October 2024, we published a [Call for Input \(CFI\)](#) to gather views on where the DRCF should focus its work for 2025/26. We received 47 responses from varying sectors and industries.<sup>2</sup> Respondents consistently emphasised the value of the DRCF and highlighted areas for potential focus - including AI, growth, fraud and scams, digital identity and online choice architecture.

We took these views into consideration when developing our plan of work, and throughout this document set out where we have taken forward CFI suggestions and why. All CFI suggestions, whether included in this Workplan or not, will also be considered as part of next year's work planning process (2026/27).

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<sup>2</sup> Responses came from across sectors in the following split: Industry (51%), Civil Society and Academia (41%), Regulators (6%) and Government (2%)

# 2025/26 Workplan

Below are topics on which the DRCF will undertake work in 2025/26. Additionally, DRCF member regulators are actively engaged in bilateral activities (activities involving two of the member regulators) on various aspects of digital regulation, with some key examples included in this document.





Building on last year's work, as set out in our Annual Report, we will continue focusing on areas where the DRCF has had the most impact. These include:

- ensuring coherence in the implementation of new digital legislation and in promoting the responsible development and deployment of AI;
- collaborating to support innovative businesses and organisations;
- conducting horizon scanning in emerging technologies, including agentic AI (systems);
- increasing regulatory skills and capabilities;
- promoting competition; and
- improving safety for users of digital services and enabling users to take informed choices, through delivering joint work in areas such as online choice architecture and fraud.

We have categorized our projects and activities based on their primary driving force in our vision. In all our activities, the DRCF remains committed to fostering beneficial innovation for UK consumers and the public, supporting economic progress in a manner that is safe, fair, and responsible.

# Unlocking innovation and economic growth

## Innovation

Regulatory innovation services can help business bring innovations to markets more efficiently by providing guidance, support, and safe testing environments to develop new products and services. Cross-regulatory innovation services streamline this support, simplifying engagement with the regulatory landscape and encouraging cohesive oversight of emerging technologies.

To this end, DRCF member regulators collaborated last year to pilot the AI and Digital Hub, a service offering informal advice to innovators. Following completion of the pilot in February, we will complete its evaluation and publish final case studies, enabling access to regulator insights for a wider audience of innovators. A key focus this year is building on the learnings from the Hub pilot, ensuring the DRCF and member regulators can best support innovators to deliver new products and services responsibly and with confidence.

In addition, the ICO will collaborate with the FCA in its AI Lab this year. The Lab was launched in early 2025 with the aim of contributing to positioning the UK as a leader in AI adoption in financial markets. The ICO will encourage the adoption of data protection by design principles as AI becomes more prevalent in financial services. This will make it easier for firms to understand how to meet their data protection requirements while increasing consumer trust - and therefore take-up of innovative products and services.

## AI

As a group of regulators, we are keen to realise the benefits AI has to offer, aligned to the government's AI Opportunities Action Plan. We know clarity and consistency of how existing regulation might apply to AI across the various sectors is important to industry confidence and perceptions of the UK as a place to start and grow an AI business - and there is a clear role for DRCF in supporting this.

Each year, CFI respondents ask the DRCF to continue work on AI, which now cuts across many of our activities - including horizon scanning, regulatory and supervisory technologies, fraud and scams, each detailed within later sections. For 2025/26, CFI respondents requested a focus on regulatory consistency in AI and AI assurance, encouraging us to work with a wider group of regulators to ensure coherence. We have taken account of these proposals in shaping our AI project activities.

We will:

- Establish dedicated fora to exchange insights on new AI applications and solutions including synthetic media and deepfakes, agentic systems and assurance, publishing periodic updates.

- Develop our collective understanding of how one another’s regulatory regimes might apply to AI; and work to identify and resolve any points of conflict.
- Build on our research into the third-party auditing market by continuing to share knowledge and insight between regulators on AI auditing through our internal Skill Share group. We will identify opportunities to draw on the knowledge of external experts in this workstream.
- Hold a roundtable with financial services industry leaders to further develop our understanding of how firms perceive regulatory uncertainty and challenge in respect of AI adoption and wider innovation, and how the ICO and FCA can work together with industry to provide greater regulatory certainty and support growth.

## Digital identity

Safe and secure digital identity could help people to access services more efficiently and help bridge the digital divide. Various CFI respondents raised digital identity as an area of interest, highlighting the importance of collaboration between DRCF member regulators and other entities including the Office for Digital Identities and Attributes (OfDIA).

Building on previous work in [digital identity](#), and discussions initiated at the DRCF Digital Horizon event which took place in March 2025, the DRCF will convene a symposium with industry, regulators, government and broader stakeholders to continue discussions around trust, interoperability, accessibility and competition. We will also collaborate to highlight opportunities for wider adoption whilst ensuring that identity services are implemented safely and responsibly. We will maintain a watching brief in areas such as digital wallets and age assurance, and will continue sharing our knowledge and insights to support regulatory coherence.

## Smart Data

Smart Data (the secure sharing of customer and business data with authorised third-party providers) has huge potential for promoting cross-sector competition, unlocking new products and services for consumers, and stimulating growth.

Smart Data is likely to involve all four DRCF member regulators. It is anticipated that Smart Data will enable the creation of a long-term regulatory framework for open banking in the UK and will pave the way for smart data schemes in other sectors of the economy. Ofcom [consulted](#) on open communications in 2023. The ICO will have a significant part to play in ensuring Smart Data schemes protect people’s information rights, promoting trust and transparency.

Smart Data-related bilateral activities between member regulators will continue in 2025/26. This includes the FCA and ICO jointly exploring open finance through a horizon scanning lens, building on research commissioned by the FCA on potential models. In addition, the FCA and ICO will continue engagement on the protection and use of consumer data - both to maximise adoption of open banking and to work towards regulatory initiatives and advice to support the development of open finance.

In parallel with bilateral activities, the DRCF will conduct a review of the future of a data-led economy and the opportunities this could herald, partnering with a wider group of regulators where applicable. This will contribute to regulators' preparations for the implementation of Smart Data.

## Horizon scanning

The DRCF's horizon scanning project, which anticipates developments in technology and their regulatory implications, helps regulators proactively adapt to the changing technological landscape and gives industry early awareness of regulatory implications that may be relevant to design and adoption of their innovations. This year, the project will focus on three areas featured frequently in CFI responses: agentic AI (systems), Smart Data and cybersecurity.

### Agentic AI

AI applications will continue to evolve over the next year, leading to new opportunities and risks for DRCF members' regulated industries. Among the innovations on the horizon are agentic systems that can execute complex tasks autonomously. Several CFI respondents asked us to explore agentic AI and the potential impact of regulation on its development and adoption. This year, the DRCF will therefore examine the potential future ecosystem of agentic AI to understand how it may develop and the regulatory implications for regulators and industry, producing an external output in 2026.

### Cybersecurity

All digital services rely on secure networks, and cybersecurity is increasingly important as societies and economies become more interconnected. The July 2024 King's Speech announced the introduction of a Cybersecurity and Resilience Bill in 2025 to improve UK cyber defences and protect our essential public services. This will bring cybersecurity to the forefront of discussions around security online, building on Ofcom's work on network security issues. Due to this, the DRCF will convene and engage externally to facilitate industry-wide discussions on cybersecurity during October 2025 (Cybersecurity Awareness Month).

## Data protection and competition

### Online Advertising

The ICO and CMA will continue to cooperate on online advertising issues. They will explore how to provide further clarity to support competition, privacy-friendly outcomes and growth in this important sector, taking account of market developments<sup>3</sup> and innovations since their joint statement<sup>4</sup> in 2021. This work will build on collaboration in relation to Google’s Privacy Sandbox, and engagement as the ICO develops its guidance for organisations considering ‘consent or pay’ models.

### Foundation models

The CMA and ICO will continue to engage with one another, and other organisations, on AI foundation models. This follows the March 2025 publication on open and closed access models, providing clarity on the interplay between data protection, competition and consumer law to support businesses considering the development and deployment of this technology.

### Cloud

The ICO and CMA will discuss any relevant issues on activities regarding cloud markets and services. This includes matters relevant to the CMA’s Cloud Services Market Investigation and the ICO’s update to its Cloud Computing Guidance.

## Collaboration under the digital markets competition regime

The DRCF regulators will continue to collaborate on issues which impact digital markets in the UK. Collaboration on digital markets is underpinned by the DMCC Act, which has established a new ‘digital markets competition regime’ for the CMA to promote competition in fast-moving digital markets, while protecting UK consumers and businesses from unfair or harmful practices. The regime is carefully designed to enable the CMA to take a highly tailored, bespoke approach to identifying and addressing specific harms, working in a participative way with relevant firms and the broader digital ecosystem. In January, the CMA began investigating whether to designate Google as having strategic market status (SMS) in respect of its provision of general search and search advertising services, and Apple and Google as having SMS in respect of the provision of their mobile ecosystems (the “mobile ecosystems investigations”).

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3 For example the ICO is reviewing the Privacy and Electronic Communications Regulations (PECR) consent requirements to enable a shift towards privacy-preserving online advertising models. This will support growth in the advertising sector whilst making privacy enhancing online advertising viable in the market. The ICO will also invite organisations to trial innovative data-driven solutions within a controlled regulatory environment in its extended regulatory sandbox.

4 Our 24/25 DRCF workplan proposal to update the 2021 joint statement was not taken forward due to the changed timings of data protection legislative changes. We will continue to collaborate across our different workstreams on digital markets, to review and prioritise where further clarity may be required.

The DMCC Act includes provisions to enable further coordination between the CMA and other digital regulators. The CMA has published Memorandums of Understanding with FCA, ICO and Ofcom (as well as with the Bank of England and Prudential Regulatory Authority (PRA)) which set out how it is putting into effect the regulatory coordination provisions of the DMCC Act.

Coordination is already taking place between the CMA and other DRCF regulators under these new arrangements. The CMA, FCA, ICO, and Ofcom have established regular pipeline meetings to review issues related to digital markets for consideration by the CMA as it progresses implementation of the new regime. Engagement is also taking place on specific issues of shared interest within the first investigations launched by the CMA. This includes ongoing collaboration between the CMA and Ofcom on issues related to digital markets and the news industry as part of the CMA's Google search investigation; and collaboration between the CMA and FCA (and PRA) on issues related to digital wallets as part of the CMA's investigations as to whether to designate Apple and Google as having strategic market status (SMS) in respect of mobile ecosystems. The CMA and ICO will also cooperate as appropriate where investigations under the CMA's Digital Markets Competition Regime - concerning general search, search advertising and mobile ecosystems - could touch on issues at the intersection of regulatory regimes, such as data portability, data access, consumer choice and design practices.

# Protecting people online

## Online choice architecture

Online choice architecture (OCA) and harmful design remain key areas of focus for DRCF member regulators. The ICO and CMA have previously published a [joint paper](#) on harmful design in digital markets and continue to work together to ensure industry good practice. In September 2024, Ofcom published their report [Understanding Online Choices, Preferences, and Welfare](#), which explored the effectiveness of a range of ‘user empowerment tools’ designed to help individuals make online choices better aligned with their preferences by encouraging more considered decision-making. The report emphasises the considerable value of regulators coordinating on their approaches to consumer empowerment interventions.

By pursuing further collaboration on OCA, DRCF member regulators will work together to protect people from dark patterns and unfair practices online. CFI respondents this year asked the DRCF to pay closer attention to OCA, by drawing out each regulator’s expectations of safety by design, collaborating with one another and ensuring consumer messaging meets regulatory standards. Building on our existing internal knowledge sharing, the DRCF will review key intersections between regulation for OCA; work towards greater consistency in OCA definitions and industry expectations; and explore the potential for joint design and deployment of user empowerment tools.

## Fraud and scams

As technology continues to develop, member regulators wish to see consumers protected from fraud and scams, with access to appropriate redress if problems occur. Tackling fraud and scams is critical to building consumer confidence and trust in online services and new technologies. This is a priority issue for CFI respondents.

The DRCF will complement existing regulator engagement with government agencies, other regulators and international bodies where appropriate. One cross-cutting clarification that industry ask for is the circumstances in which sharing of personal data is permissible in order to tackle fraud. In November, the ICO [published practical advice](#) to provide clarity on how organisations can share data responsibly to tackle fraud and scams, whilst in July Ofcom [published a paper](#) looking at measures firms can take to mitigate the harms of deceptive deepfakes. The FCA has [launched targeted action](#) against ‘finfluencers’. Engagement will continue between DRCF members, other regulators and government to share insights that facilitate effective fraud mitigation efforts.

Alongside this, the FCA and Ofcom will continue to work closely together on their shared objective of reducing consumers’ exposure to fraud online.

This year, they will focus on ensuring the FCA's expertise in illegal financial promotions informs the development of Ofcom's future work, including the development of the [Fraudulent Advertising Code of Practice](#), due to be developed under the Online Safety Act.

## Online safety and data protection

The Ofcom and ICO project on online safety and data protection will continue to deliver on our commitment to ensure coherence and promote compliance with both regimes. Building on the existing statement of cooperation, activities for 2025/26 include:

- Publishing a third joint statement in Autumn 2025, providing clarity to services on compliance with online safety and data protection legislation in managing risks to children.
- Building on our knowledge of cross-cutting online safety and data protection issues and coordinating our engagement with companies of mutual interest.
- Engaging on Ofcom's Online Safety Codes of Practice and guidance.
- Collaborating on the ICO's data protection and safety technologies guidance.

This collaboration aims to increase the confidence of users of online services that their safety and privacy will be protected. In addition, as outlined in Ofcom's [Digital Markets Strategic Update](#), the CMA and Ofcom collaborate to manage interactions between online safety and the pro-competition digital markets regime.

## Financial services and data protection regulation

The FCA and ICO understand the importance of clarity for businesses to navigate the requirements of their regimes. They are collaborating to support firms in upholding their Consumer Duty and data protection law obligations when communicating to savings, retail investments and pensions customers.<sup>5</sup>

Joint work will continue with a roundtable with industry leaders on 9 May. It will focus on areas of regulatory uncertainty for industry regarding AI adoption and wider innovation, how the ICO and FCA can work together with industry to provide greater regulatory certainty, and will identify where greater regulatory support is needed within data protection and financial regulation.

The FCA will also continue to engage on the Consumer Duty as work on the Advice Guidance Boundary Review<sup>6</sup> develops and may intersect.

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5 [Joint letter from the ICO and FCA to UK Finance and Building Societies Association | ICO](#) ; [Joint statement from the FCA, ICO and TPR for retail investment firms and pension providers | ICO](#)

6 [CP24/27: Advice Guidance Boundary Review – proposed targeted support reforms for pensions](#)



# Regulator capability building

## Regulatory AI and digital solutions

The government's AI Opportunities Action Plan highlighted the importance of improving regulator capabilities, and we received proposals in the CFI that the DRCF should coordinate how member regulators are adopting AI. All our member regulators are keen to improve operational efficiency through use of technology, as well as to limit the cost and complexity of regulatory compliance.

As each of our member regulators makes advances in the adoption of regulatory and supervisory technologies, our DRCF regulatory solutions workstream is supporting them by sharing learnings and best practice on these technologies.

As there are significant commonalities between the tools each regulator is building, testing and adopting, sharing lessons learned can make a critical difference to enabling the rapid adoption of new tools at scale, while saving costs.

## Skills and capabilities

One of the core goals of the DRCF, and a key element of our three-year vision, is to support member regulators in upskilling staff to implement digital regulation effectively. We do this by providing upskilling sessions, facilitating secondments between member regulators and wider organisations, and supporting regulator graduate schemes. In 2025/26, the DRCF will continue to hold AI and digital skills webinars for staff with a series of internal and external speakers.

This year, the DRCF, in collaboration with the UK Regulators' Network (UKRN), will facilitate cross-regulator learnings via a newly launched digital skills mentoring programme, to upskill colleagues in digital regulation and strengthen networks between staff working on digital matters at all levels of the DRCF member regulators. In addition, two British Academy Research Fellows will join the DRCF for a year to strengthen the DRCF's research capabilities.

## Information sharing

Sharing information is key to ensuring regulators are leveraging collective expertise. It increases regulatory efficiency and can reduce the compliance burden on firms by limiting duplication. As part of our 2025/26 programme of work, we plan to review both legislative gateways and regulator practice on information and data sharing, to ensure regulators can share information and data sets where efficient to do so, while protecting appropriate legal and practical confidentiality requirements.

## Engagement

More than ever, we are aware that effective digital regulation requires conversation between all those affected: government and regulators, industry and trade bodies, consumer representatives and civil society, academics and others. The international nature of digital and AI markets means that international dialogue is also vitally important.

The DRCF is keen to continue to be as transparent and accountable as possible in its own work while also listening to a broad range of views. Consequently, we will maintain our high momentum of engagement and communications activity in 2025/26, both showcasing our own work and offering a platform for discussing our members' digital regulation activities. Our experience has demonstrated the value DRCF can provide as a convenor of discussions spanning regulatory and compliance remits - we are keen to maintain and build on that convening role in the coming year.

## Regulators

We plan to work more extensively with non-member regulators this year, partnering with them to deliver on areas of common interest. We host a quarterly regulator roundtable, bringing together 13 non-member regulatory bodies to share expertise and best practice.

## UK industry and civil society

The DRCF will continue to both lead and participate in discussions on digital regulation. We will do this through regular events, bespoke roundtables and individual conversations - collaborating with a wide range of industry and civil society organisations across the UK to enhance understanding, gather insights, and maximise our impact.

## International engagement

International collaboration is not just beneficial but essential for effective digital regulation to address the global nature of digital markets, technologies and risks. By engaging with our international counterparts, DRCF member regulators can share insights, work towards harmonising standards and consider cross-border issues such as data privacy, online harms, competition and AI. This framework also promotes innovation by providing greater clarity for firms operating internationally, bridging cross-border regulatory divergence where possible, and reinforcing consumer trust through greater coherence.

We will continue to engage with international regulators to promote the benefits of cross-regulatory cooperation and discuss substantive cross-regulatory issues through our work with the International Network for Digital Regulation Cooperation (INDRC). Additional areas of focus will include engaging with the International Competition Network and data protection authorities at the G7.

We are keen to hear from you about the impact of the DRCF's work:  
please contact [drcf@ofcom.org.uk](mailto:drcf@ofcom.org.uk)

We're also eager to keep stakeholders informed of our ongoing work. We now publish a DRCF bi-monthly newsletter: please contact the above email address to be added to the distribution list.

You are welcome to follow our [LinkedIn page](#), and you can [visit our website here](#).

