Online Dating &
Discovery Association

To: Ofcom (via email)

4th February 2026

RE: RESPONSE TO CONSULTATION ON OFCOM'S PLAN OF WORK 2026/27:

The Online Dating and Discovery Association (ODDA) is the recognised trade body for the sector with a mission to create safe, responsible and enjoyable experiences for everyone. Representing nearly 500 brands world-wide, we would like to thank Ofcom for the opportunity to respond to the consultation on the proposed Plan of Work for 2026/7.

As a sector that is fully committed to ensuring the safety and security of its users, we welcome the inclusion of online safety as one of the four priorities in the Plan. We are therefore pleased to see an ongoing commitment to the list of long-term goals that we believe are entirely consistent with the approach that our members are taking in the UK and beyond.

As we have made reference to in previous consultation responses, we strongly support an outcome-focused approach to regulation that gives greater flexibility to in-scope services to determine how they meet their legal duties under the Online Safety Act (OSA) and are pleased to see this reflected in the Plan of Work.

In terms of specific comments, our response is below:

- We welcome reference in the Plan of Work to the growing use of Artificial Intelligence (AI) and note the regulatory gaps that currently exist in relation to AI chatbots. With chatbots becoming increasingly popular, Ofcom may be interested in a PhD research project the ODDA is supporting through the School of Arts, Languages and Cultures at the University of Manchester, which seeks to provide a deeper insight into the opportunities and challenges posed by AI-driven dating bots. The goal of the research is to explore and steer the future visions of AI chatbots in online dating to guide their ethical development.

- The ODDA is pleased to see references to the importance of partnerships throughout the document. This is particularly relevant at an international level, where consistency among regulators in how they approach online safety is absolutely crucial for services in the digital economy who operate across geographical boundaries. The ODDA welcomes the work of the Global Online Safety Regulators Network (GOSRN) which we hope will reduce the administrative impact of compliance on businesses.

We do however, have some concerns in relation to specific sections of the Plan where we believe further clarity is required. For example:

- While Ofcom have been incredibly proactive in communicating key milestones for the implementation of the OSA as well as updating their Roadmap frequently, we note that the majority of the implementation dates for 2026 are still approximate and subject to change. Although we recognise that it can be difficult to provide definitive dates due to factors outside the control of Ofcom (such as Parliament), we believe that the lack of clarity makes it harder for firms to plan effectively – especially where there is a need to reallocate resources to ensure compliance. We therefore encourage Ofcom to explore ways in which it can provide more certainty around the implementation dates of future codes and guidance.

- We also think it's important for Ofcom to develop a better understanding of the impact of the OSA on smaller firms and specifically, its effect on innovation. As Ofcom are aware, the OSA is one of a number of legislative requirements that firms will have to get to grips with this year. 2026 will also see a new subscription contracts regime come into effect under the Digital Markets, Competition and Consumers Act (DMCCA) and potentially, further changes to the UKs data protection regime.

- We are perhaps most disappointed however, to see fraud given such little mention in the Plan. While there are references to additional duties in relation to fraud that apply to categorised services, we strongly believe that Ofcom needs to take a much firmer position and wider view on the relationship between fraud and online safety. We have written previously to Ofcom on this matter, providing examples of where criminals have targeted users of online services following the implementation of age assurance. To address this issue, we would like to see Ofcom carry out a fraud risk assessment on every code, guidance document or additional measure to understand where and how criminals could exploit potential vulnerabilities. If not, there is a real risk that the public will lose trust and confidence in the effectiveness of the OSA. Given that the topic of fraud featured so prominently at the recent workshops, we hope that Ofcom will reconsider the lack of fraud references in the Plan.

Finally, we would like to thank Ofcom for their continued proactive engagement with the ODDA and its members as we make the UK the safest place to be online.

Yours sincerely,

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