



## GCRA WORK PLAN

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2026

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## FOREWORD

The Guernsey Competition and Regulatory Authority (“GCRA”) is pleased to present its Work Plan for the period April to December 2026.

Over the past 25 years, the GCRA has focused on promoting fair competition, protecting consumer interests, and ensuring that regulated markets operate transparently and efficiently for the benefit of Islanders and the wider Bailiwick economy. As an independent statutory authority, we remain committed to these core objectives while continuing to respond to evolving market dynamics and the policy priorities of the States of Guernsey.

The GCRA is providing this Work Plan for 2026 at a time of significant and extended uncertainty. Since July 2024, the Committee for Economic Development (“**the Committee**”), as the Committee through which the GCRA reports and is accountable to the States Assembly, has been undertaking a review of the competition legislation and regulatory framework in Guernsey, as well as the role, objectives, and resources required by the GCRA. While it was previously indicated that this would be an expedited process intended to provide strategic direction to the GCRA by the end of 2024, the review remains ongoing.

This continuing review presents two uncertainty challenges for the GCRA. The first concerns the funding available to support the discharge of many of its competition law functions, and the second relates to the GCRA’s strategic framework.

Competition law work is generally funded through the GCRA’s competition law grant, which is provided by the Committee. Due to pressure on public expenditure, and as communicated by the Committee toward the end of 2025, the competition grant for 2026 has been set at a level which will require the GCRA to scale back its competition work significantly in 2026. Regrettably this has meant the GCRA is not in a position to carry out its competition functions other than in specific areas where there are alternative sources of funding.

In 2024 the GCRA circulated a draft strategic and operational priorities document to the Committee. In response the Committee indicated that the above-mentioned review needed to be completed before it would comment on the strategic and operational priorities document. This has made it more challenging for the GCRA to set a medium to long term forward-looking plan that fully reflects the needs of consumers, licensed operators, and the States of Guernsey.

Notwithstanding the above, the GCRA considers it necessary to publish a Work Plan for 2026. The GCRA's Work Plan provides stakeholders, including Licensees, with important and timely clarity regarding the GCRA's priorities for the remainder of the year, establishes a framework through which the GCRA can organise and prioritise its resources, and appropriately explains the uncertainty and funding constraints currently faced by the GCRA.

It is anticipated that the Committee's review will be completed during the second half of 2026. Following its conclusion, the GCRA will re-consider its Work Plan taking account of any decisions of the Committee.

Notwithstanding this context, the GCRA will continue to advance principles that ensure regulated businesses operate fairly and consumers are empowered, confident, and able to exercise informed choices.

Engagement with stakeholders, including businesses, consumer groups, and government, will remain a central feature of our approach. Through transparent consultation and robust analysis, we aim to ensure that our decisions are well informed, proportionate, and supportive of economic growth and consumer welfare. As markets and technology continue to evolve, so too will our methods and priorities, ensuring that the GCRA remains an effective and adaptive regulator.

The GCRA is grateful for the constructive engagement of stakeholders across the Bailiwick and looks forward to continuing to work collaboratively to achieve positive outcomes for Islanders and businesses in 2026 and beyond.

## ABOUT THE GCRA

The GCRA is an independent statutory body that works to ensure markets in Guernsey are fair, efficient and operate in the interests of consumers and the wider economy.

The GCRA was established by the States of Guernsey in 2001 as the Office of Utility Regulation and is responsible for the economic regulation of electricity, postal services and telecommunications. In 2012, its remit was expanded when it was designated as the Bailiwick's competition authority, with responsibility for enforcing competition law across the Bailiwick.

The GCRA operates within a legislative framework that defines its duties, functions and powers. This framework includes Telecommunications (Bailiwick of Guernsey) Law, 2001<sup>1</sup>, the Regulation of Utilities (Bailiwick of Guernsey) Law, 2001<sup>2</sup>, the Post Office (Bailiwick of Guernsey) Law, 2001<sup>3</sup>, the Electricity (Guernsey) Law, 2001<sup>4</sup>, and the Competition (Guernsey) Ordinance, 2012<sup>5</sup>. Together, these laws establish the GCRA's role and provide the statutory basis for its independence as a regulator.

As the Bailiwick's competition authority, the GCRA is tasked with conducting merger reviews, market studies and investigations, and enforces prohibitions against anti-competitive conduct. It also provides advice to the States of Guernsey to support informed policy development that takes proper account of the benefits of competition. In carrying out these functions, the GCRA regulates its own proceedings and acts impartially and objectively.

In its role as economic regulator of telecommunications, post and electricity, the GCRA has established licensing and supervisory frameworks that require operators to meet defined standards. These frameworks look to promote effective competition, protect consumers and help ensure that essential services are reliable, efficient and delivered on fair terms throughout the Bailiwick.

The organisation's executive functions are led by the Chief Executive, who also serves as a Member of the GCRA. The Chief Executive is supported by a team of permanent staff responsible for delivering the GCRA's

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<sup>1</sup> [Telecommunications \(Bailiwick of Guernsey\) Law, 2001](#)

<sup>2</sup> [Regulation of Utilities \(Bailiwick of Guernsey\) Law, 2001](#)

<sup>3</sup> [Post Office \(Bailiwick of Guernsey\) Law, 2001](#)

<sup>4</sup> [Electricity \(Guernsey\) Law, 2001](#)

<sup>5</sup> [Competition \(Guernsey\) Ordinance, 2012](#)

regulatory and competition work. Where specialist expertise is required, external advisers and contractors are engaged to provide additional technical or professional support.

Decisions of the GCRA are taken by its Board Members, who are appointed by the Committee for Economic Development of the States of Guernsey. The Chairperson is appointed by the States of Deliberation on the recommendation of the Committee.

The GCRA is independent in its decision making but accountable to the States of Guernsey. Its relationship with the Committee for Economic Development is governed by an agreement under which the GCRA reports every six months on progress against its work programme and on the use of public funding. The States, acting through the Committee, may issue written guidance on matters of corporate governance and may give strategic or general directions. The GCRA is required to exercise its functions consistently with such directions, to have regard to government policy and to follow the statutory principles of regulation set out in law.

## PURPOSE, VISION, PRIORITIES, AND VALUES

The GCRA exists to support well-functioning markets that benefit the island's economy and community. Our functions and duties are set out in statute and inform the GCRA's purpose, vision, priorities, and values. In practical terms, this means ensuring competition works properly, market power is not abused, consumers have good information to make decisions, and regulated infrastructure is reliable, resilient, and efficient.

Well-functioning markets matter because they help generate wealth, encourage entrepreneurship, attract business investment, and place natural constraints on unfair practices that can increase the cost of living. They can also enable economic diversity by supporting new and innovative activities.

Within this broader vision, the GCRA's purpose is centred on four key objectives:

- Promoting value and choice for Guernsey consumers;
- Protecting consumers who cannot easily make their voices heard;
- Supporting the delivery of Government policy in regulated sectors; and
- Monitoring markets to identify emerging risks or consumer harm.

The GCRA prioritises activities that strengthen trust in markets and deliver meaningful benefits to consumers and the economy. Trust arises when rules are applied fairly, consumer perceptions of value are positive, and the regulatory framework is transparent, proportionate, and adaptable. To achieve this, the GCRA focuses on:

- Identifying market failures and responding where intervention is justified;
- Investigating anti-competitive behaviour supported by evidence;
- Enforcing regulatory licences proportionately; and
- Working with Government to identify areas for policy or regulatory action.

Importantly, the GCRA recognises the distinctive characteristics of a small island economy. This shapes regulatory decisions, as solutions must be realistic and proportionate to Guernsey's scale and market conditions.

The GCRA is guided by three key prioritisation principles<sup>6</sup>:

- **Actionable** – acting only where it has legal powers to address issues effectively
- **Realistic** – ensuring interventions are practical and achievable in a small jurisdiction
- **Meaningful** – focusing on actions that deliver a net positive benefit to markets and consumers

These prioritisation principles enable the GCRA to deploy its limited resources effectively in order to achieve the best possible outcomes for Guernsey.

When undertaking its work, the GCRA abides by its values and principles of **openness, integrity, and accountability**.

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<sup>6</sup> [Prioritisation Principles | GCRA. The GCRA weighs up matters before it](#)

## 2026 PLAN: TELECOMMUNICATIONS

Project Details	Milestones
<p><b>T3 Guernsey Numbering Scheme:</b> In Q1 2025, the Telecommunications (Bailiwick of Guernsey) Law 2001 was amended to permit the GCRA to delegate the establishment and management of a Guernsey numbering scheme to Ofcom. The GCRA and Ofcom are working closely to establish an arrangement which will permit Ofcom to allocate numbers to Licensed Operators. It is envisaged that this will be achieved via a memorandum of understanding (MOU) between the GCRA and Ofcom, which shall be signed in March/April 2026. To facilitate for this MOU arrangement and the establishment of the Guernsey Numbering Scheme, the GCRA will additionally need to make certain changes to Licensed Operators' licences, which will be consulted on in Q3/Q4 2026.</p>	<p><b>Q1 2026 – GCRA/Ofcom MOU signed</b></p> <p><b>Q3 2026 – Proposed Decision</b></p> <p><b>Q4 2026 – Final Decision</b></p>
<p><b>T3 Global Titles:</b> In 2025, the GCRA consulted on its proposal to prohibit Global Title leasing in Guernsey so that bad actors are prevented from accessing the global mobile signalling network. This proposal followed decisions in the United Kingdom and Jersey to similarly prohibit Global Title leasing. The GCRA intends to resume this work in 2026. After receiving feedback from stakeholders throughout H1 2025, the GCRA expects to publish a Proposed Decision in Q2 2026 and then, subject to responses, publish a Final Decision in either Q2 or Q3 2026.</p>	<p><b>Q2 2026 – Proposed Decision</b></p> <p><b>Q2/Q3 2026 – Final Decision</b></p>
<p><b>T2 Fixed Number Portability:</b> Industry and customer engagement in 2025 has indicated strong demand for fixed number portability (FNP) in Guernsey. The GCRA has agreed to work jointly with the JCRA to assess the technical and commercial feasibility of implementing FNP across the Channel Islands (Phase 1). This assessment will take place between March and September 2026. Where, following engagement with Licensed Operators and third-party experts, both the GCRA and JCRA agree it is feasible to do so, both authorities will work jointly with Licensed Operators to implement FNP in 2027 (Phase 2).</p>	<p><b>Q3 2026 – Phase 1</b></p> <p><b>2027 – Phase 2</b></p>
<p><b>T4 Regulatory Accounting Guidelines:</b> In December 2025, the GCRA published its draft Regulatory Accounting Guidelines for consultation. The Draft Guidelines set out a separated-accounts framework that is proportionate, reasonable and fit for current regulatory needs. The consultation period for the Draft Guidelines closed on 30th January 2026, and the GCRA will now consider responses and produce a Final Decision. Once published, the GCRA</p>	<p><b>Q2 2026 – Final Decision</b></p> <p><b>2026/2027 - Implementation</b></p>

<p>will work collaboratively with all stakeholders to ensure that the separated-accounts framework is implemented in a timely manner.</p>	
<p><b>T1 Retail Market Reviews:</b> In Q2 2025, the GCRA initiated reviews of the retail broadband and retail leased lines market in Guernsey. The purpose of the reviews was to identify whether any Licensed Operator(s) hold a dominant position within those markets, and if so, to introduce remedies to prevent that dominant position from being exploited. A Proposed Decision has been published for the retail broadband market and is currently open for consultation. The GCRA will engage with relevant stakeholders to obtain feedback on its proposals before publishing a Final Decision later in 2026. The GCRA continues to assess the retail leased line market.</p>	<p><b>Q1 2026 – Proposed Decision</b> <b>Q3 2026 – Final Decision</b></p>
<p><b>T4 Annual Market Statistics:</b> The GCRA will continue to work jointly with the Jersey Competition &amp; Regulatory Authority (JCRA) and 4insight Limited to produce annual market statistics.</p>	<p><b>Q2 2026 - Publication</b></p>
<p><b>T1 Consumer Contracts:</b> In Q3 2026, the GCRA will publish a consultation about making consumer contracts more accessible and informative. Research about residential broadband customers undertaken in Q2 2025 has suggested that consumers can be unsure about what products and services they pay for, and when contracts for those products and services come to an end. The GCRA will review the contractual information provided to residential customers in Guernsey and, where improvements can be made, propose new consumer contract measures. The GCRA will also investigate the introduction of measures to alert customers that their contracts are ending.</p>	<p><b>Q3 2026 – Consultation</b> <b>Q4 2026 – Proposed Decision</b></p>
<p><b>T1 Broadband product information:</b> In Q2 2025, the GCRA undertook consumer research about residential broadband customers. This research indicated that many broadband customers find it difficult to compare options and select the broadband product which is right for them. The GCRA will review the information which is available to broadband customers and the extent to which it enables customers to understand, compare and switch broadband products. Where there are barriers to making informed decisions or switch broadband products, the GCRA will seek to introduce new measures which make it easier for customers to make informed decisions about their broadband.</p>	<p><b>Q2 2026 - Consultation</b></p>
<p><b>T1 Mid-contract price increases:</b> The GCRA’s consumer research indicates that mid-contract price increases could represent a barrier</p>	<p><b>Q4 2026 - Consultation</b></p>

<p>to switching because it negates the cost savings which could be achieved via switching. Furthermore, the GCRA has observed that some Licensed Operators have applied inflation-linked price increases, which are designed to offset Operators' increased costs, when input costs have significantly decreased. The GCRA is therefore concerned that inflation-linked price increases are being imposed unfairly and inappropriately. The GCRA is launching a review of these practices in 2026 and will act where there is evidence to suggest that these price increases are unfair or inappropriately dissuade switching.</p>	
<p><b>T4 Mast Audit:</b> The GCRA conducts annual audits to ensure the emissions from mobile masts on the island are within International Commission for Non-Ionising Radiation Protection (ICNIRP) guidelines, making the results publicly accessible. These audits verify adherence to licensing obligations related to radio emissions, ensuring public and staff safety near masts.</p>	<p style="text-align: center;"><b>Q3 2026 – Audit</b> <b>Q4 2026 –Report Publication</b></p>
<p><b>T3 Wholesale Access Framework:</b> The GCRA will be launching a review of the products and services required by Licensed Operators to offer fixed and mobile services in Guernsey. This will include wholesale access products such as those provided by Sure for voice, broadband and leased lines, and those provided by all Licensed Operators, such as interconnection, mobile number portability, and data centres. The purpose of the review is to understand and identify aspects of these wholesale access products, and which could be improved to make access to retail markets more efficient and timelier.</p>	<p style="text-align: center;"><b>Q4 2026 - Consultation</b></p>
<p><b>T4 Telecommunications Security Standards:</b> Before the GCRA can consider whether it is appropriate to introduce telecommunications security standards in Guernsey, and the nature of those standards, the States of Guernsey must first give the GCRA the appropriate mandate and statutory powers, as has been the case in other jurisdictions. It is currently envisaged that such a mandate and statutory powers will be afforded to the GCRA by issuing a policy letter and making changes to the Telecommunications (Bailiwick of Guernsey) Law, 2001. The GCRA will continue to advise and participate in the development of this policy letter and updated statutory framework.</p>	<p style="text-align: center;"><b>Ongoing</b></p>
<p><b>T5 Spectrum:</b> In Q3 2025, the GCRA published its Spectrum Award Framework. This framework allows for fair, efficient, technology-led, and future-proof allocation of radio spectrum in Guernsey. The GCRA</p>	<p style="text-align: center;"><b>Ongoing</b></p>

<p>will continue to respond to demand for radio spectrum through its Spectrum Award Framework, ensuring that allocations of scarce radio spectrum are in the interests of the public, contribute to innovative and competitive markets, and are used quickly and efficiently.</p>	
<p><b>T6 Complaints, Market Failures, and Enforcement:</b> The GCRA has a duty to consider all complaints and disputes about the conduct of licensees. Accordingly, the GCRA will carefully consider all complaints and disputes raised and do so in accordance with its Investigation Procedures and Regulatory Enforcement Guidelines. Where appropriate, the GCRA may take enforcement action to ensure compliance with the law, and to protect consumers and markets.</p>	<p><b>Ongoing</b></p>
<p><b>T6 Compliance Monitoring:</b> In Q4 2024, Sure (Guernsey) Limited (“Sure”) acquired Guernsey Airtel Limited, and in doing so made certain post-merger undertakings, which can be found in Sure’s telecommunications licences. The GCRA will monitor Sure’s compliance with these undertakings.</p> <p>In Q1 2024, the GCRA introduced charge controls in the Wholesale Broadband Access and Wholesale Leased Line Access markets. These charge controls determine the price that Sure can charge for wholesale broadband and leased line products and services. Similarly, in Q3 2020, the GCRA introduced charge controls for mobile termination. The GCRA will continue to monitor Sure’s compliance with those charge controls.</p> <p>The GCRA will monitor Licensed Operators’ compliance with licence conditions, and in particular consumer protection conditions, and where appropriate use its statutory information gathering powers to undertake this monitoring.</p>	<p><b>Ongoing</b></p>

## 2026 PLAN: COMPETITION

As explained in the foreword, the GCRA’s competition work is primarily funded through the Committee’s competition law grant. However, due to public expenditure pressures, the 2026 grant has been reduced, requiring a significant scaling back of competition activities. As a result, the GCRA will only undertake competition work in limited areas where alternative funding is available.

Project Details	Milestones
<p><b>C10 Mergers:</b> The GCRA will continue to receive and review merger transactions which require approval. Where we receive applications for approval of mergers, the GCRA has a statutory obligation to consider whether the merger will substantially lessen competition within any market(s) and whether it would be to the prejudice of consumers, the economic development and well-being of the Bailiwick of Guernsey, or the public interest.</p>	<p><b>Ongoing</b></p>

**2026 PLAN: ELECTRICITY**

Project Details	Milestones
<p><b>E7 States Energy Policy:</b> In 2020, the States of Guernsey adopted a long-term energy policy for the Bailiwick. The policy, which was developed by the Committee for Environment and Infrastructure, sets out the Bailiwick’s planned transition from current energy systems towards low carbon sources of energy. The policy has set a target for the Bailiwick of Guernsey to achieve net zero carbon emissions by 2050 at the latest. The GCRA will continue to advise and participate in the achievement of this policy within the scope and remit of our current powers.</p>	<p><b>Ongoing</b></p>
<p><b>E7 Licensing:</b> The GCRA will continue to fulfil its duties and functions under the Electricity (Guernsey) Law, 2001. This includes issuing licences for the generation, conveyance, and supply of electricity on the island of Guernsey.</p>	<p><b>Ongoing</b></p>