

## **Consultation Response**

### **Review of signing arrangements for relevant TV channels (Ofcom)**

**22 September 2014**

#### **About us**

Action on Hearing Loss is the new name for RNID. We're the charity working for a world where hearing loss doesn't limit or label people, where tinnitus is silenced – and where people value and look after their hearing.

Our response will focus on key issues that relate to people with hearing loss. Throughout this response we use the term 'people with hearing loss' to refer to people with all levels of hearing loss, including people who are profoundly deaf. We are happy for the details of this response to be made public.

#### **Comments**

Action on Hearing Loss welcomes the opportunity to comment on Ofcom's consultation regarding their review of signing arrangements for relevant TV channels.

A recent survey undertaken by Action on Hearing Loss, with Sense and RNIB, found that of those who watch programmes with sign language, over two fifths of respondents watch the programmes live, two fifths record the programmes to watch at a more convenient time and over a quarter watch sign interpreted or presented programmes on catch up services. It is therefore important for BSL users to continue to have a choice about how they watch sign presented, sign interpreted and subtitled programmes.

- 1. Do you agree that it would be appropriate to increase the minimum contributions to alternative signing arrangements to bring them back to the 2007 level in real terms, and to make annual adjustments for inflation thereafter? If not, why not?*

We agree that it is appropriate to increase the minimum contributions to alternative signing arrangements to take inflation into account. The amount and/or quality of sign presented programmes will have

decreased as a result of the 20% reduction in real terms of contributions by broadcasters. This is therefore a backwards step in terms of access service provision for deaf people.

British Sign Language (BSL) presented and interpreted programmes are a vital way to engage Deaf people in their own language. We therefore absolutely agree that the contributions must be increased in line with inflation, and to continue to do so over the coming years.

2. *Do you agree that it would not be appropriate to base adjustments to the minimum level of contributions to alternative arrangements on comparisons with the costs of existing sign-presented programmes, or with general TV production costs? If not, why not?*

No comment.

3. *Do you agree that it would be appropriate to make annual adjustments to the minimum contributions to alternative arrangements in line with the Consumer Price Index, and to make consequential change to the Guidance, as set out in Annex 4? If not, why not?*

No comment.

4. *Do you consider that minimum signing requirements for relevant channels should remain fixed at 30 minutes a month or should rise progressively over a ten year period to 75 minutes a month? If the latter, do you agree that consequential changes should be made to the Code, as set out in Annex 4? Please explain the reasons for your preference.*

We believe that the minimum signing requirements should rise progressively. This would bring it in line with the requirements for subtitles and audio description as well as the requirements for signing on channels with an audience share of greater than 1%. It would also help to ensure that broadcasters do not see this option as the way to spend less money, particularly if the required contributions to the BSLBT increase over time. We agree that these changes should be reflected in an updated Code.

We also urge Ofcom to review these requirements again before the end of the 10 year period to ensure that television services continue

to be increasingly accessible to BSL users. Developments in technology may require this review to be undertaken sooner.

5. *Do you consider that the transitional arrangements set out in Figure 4 would be appropriate if relevant channels are made subject to rising obligations? If so, do you agree that consequential changes should be made to the Code, as set out in Annex 4?*

We agree that it would be reasonable for the established channels to have rising obligations to ensure that they are able to plan to meet the required level. These changes should be reflected in the code.

6. *Do you consider that minimum contributions by relevant channels to alternative requirements should remain fixed at £20,000 a year (adjusted for inflation) or should rise progressively over a ten year period to £50,000 a year (also adjusted for inflation)? Please explain the reasons for your preference.*

We believe the minimum contributions should rise progressively over a ten year period. It is important for deaf people who use BSL to be able to access programmes in their own language. As a society which values accessibility and promotes equality we believe that increasing accessibility should be a key aim of the broadcasting industry.

We would also ask Ofcom to consider reviewing the BSL arrangements for higher audience channels. With increasing channel revenues on low audience channels, this may also be true of higher audience channels and therefore it may be a good time to consider also increasing the BSL requirements for these channels to ensure improved TV accessibility for deaf people.

## **Conclusion**

We support Ofcom's proposals to increase the contribution requirements for broadcasters to the BSLBT as well as increasing the amount of hours required for BSL interpretation on low audience channels. We also support the introduction of a link to inflation to ensure that broadcasters spend on signing services does not decrease in real terms.

Action on Hearing Loss believes that all deaf people should be able to access television programmes. It is therefore important that

increasing numbers of programmes are available with BSL presentation and interpretation. We therefore urge Ofcom to ensure there is another review of the requirements before the end of the 10 year period, to ensure that the amount of signed programming on TV continues to increase. It is important that deaf people continue to have a range of options for watching television, including sign interpreted programmes, sign presented programmes, as well as subtitles.

Finally, we ask Ofcom to also review the arrangements for BSL on large audience channels.

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