



becomingvisible
at the heart of the Deaf community

Becoming Visible

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Becoming Visible's Response to OFCOM's consultation

Background to Becoming Visible

Becoming Visible is a Deaf led organisation based in the North East of England. We have been in existence for 12 years. Originally an umbrella organisation, we evolved into a Deaf organisation and service provider. The main areas of work we do are the following: a) provision of British Sign Language/ English Interpreting b) Training c) Translation d) Consultation work with and for the Deaf Community e) Media Projects

What we have done in response to the OFCOM consultation

We have consulted with a group of Deaf people aged 16 – 73 who are consumers, staff and volunteers at Becoming Visible and asked them your questions. Below is a summary of their responses and comments.

We are delighted that OFCOM is carrying out this consultation exercise and we look forward to positive developments and improved TV programming for Deaf people. We feel that the proposal that is being suggested by OFCOM is a good starting point but we ask how often will OFCOM consult with Deaf people and how often will reviews take place and whether there will be implementation of proposals?

QUESTION 1:

Should the subscription that channels pay to BSLBT be increased by inflation, backdated to 2007? That would mean an increase from £20,000 to £24,100 in 2015. Then every year after that the subscription would rise by inflation.

- The general consensus from our group was that the answer should be Yes
- We believe that there was an increase in the broadcaster's revenues so therefore this should be reflected in the increase of money for Deaf TV programming
- This means that broadcasters have saved a lot of money, in paying to BSLBT, so they should reinvest their savings into higher subscription levels
- The subscription level of £20,000 was low to start with. This needs to be higher. Could OFCOM change this to a higher amount so that we have more money for good quality BSL programming?

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QUESTION 2:

Do you agree that it would not be appropriate to base the 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?

- Without knowing how much it costs to produce Deaf programmes, vs. interpreted programmes, we feel that we cannot answer this question but however the general feeling is that we prefer BSL TV programmes made by Deaf people rather than interpreted programmes
- We do feel that £20,000 is too little a starting point considering the requirements of making BSL TV programmes which we imagine to be more than mainstream programmes

QUESTION 3:

Do you agree that it would be appropriate to make annual adjustments to the minimum contributions 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?

- We are not familiar with Consumer Price Index so we are unable to answer this question. However;
- We do feel that the starting point of £20,000 needs to be much higher

QUESTION 4:

Do you consider that minimum signing requirements for relevant channels should remain fixed at 30 minutes a month or should they 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.

- Yes, the minimum signing requirements for relevant channels should rise. It is baffling why Deaf people should have restrictions placed on them for TV viewing and access
- We have worked out that the current provision is equivalent to 30 minutes a month, or about 7.5 minutes per week which is really too low
- We have waited too long for increases so perhaps it should be increased to 150hrs per month to start off with (as per inflation?)
- We are not familiar with the Access Code

QUESTION 5:

Do you consider that 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?

- No we should have no further delays. There should be immediate increase from 2015.



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QUESTION 6:

Do you consider that minimum contributions by relevant channels to alternative arrangements 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 reasons for your preference.

- Yes, contributions should rise progressively but we feel that 10 years is too long
- We feel that from 2015, the basic figure should be **double the current figure of £20,000** as the current figure of £20,000 is too low
- We ask that there be fewer repeats. There are far too many repeats of sign interpreted programmes and we ask that there be more money in the pot for allowing Deaf people to develop and make BSL TV programmes of varying genres

Additional comments from Deaf people

- 96% of the group did not watch sign-interpreted programmes. The reasons being are;
- the quality of interpretation is poor (especially produced by Signpost at ITV. Despite complaints sent to Signpost, nothing has been improved)
- No choice or say in the selection of programmes being interpreted
- Inappropriate viewing times
- BBC News – only has 2 good Interpreters (Chris Stone & Rob Skinner) that the audience can understand. Group stressed the need for emergency access during important news and using qualified Deaf Interpreters to work on TV
- We feel that BSLBT is a good space where BSL TV programming can be explored, developed, and made by Deaf people for Deaf people (still needs to develop)
- Currently, too many external pressures on Deaf people to make programmes to please hearing people – we feel that the purpose of BSLBT is to explore culture, identity and language – please allow Deaf people to achieve this in our own way.
- We wish to see more mentoring and support by Deaf TV professionals for up and coming talent and this should be the role of the BSLBT and they need extra resources for this
- The quality of BSL programmes via BSLBT is 'satisfactory' however there needs to be monitoring of the BSL content. The quality of BSL varies in each production company. There needs to be qualified Deaf BSL Linguists to monitor BSL content in the same way as Producers monitor programming content and quality.
- There was concern that the same Deaf and hearing production companies were getting the work from BSLBT. It seems that BSLBT felt that they had to prove themselves as an organisation and give the work to companies that they had a history with. However we feel that BSLBT needs to invest heavily in regions and develop a better network and develop further opportunities for other freelance and smaller organisations.

Dawn Marshall
For Becoming Visible, September 2014



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Cover sheet for response to an Ofcom consultationBASIC DETAILS

Consultation title: Review of signing arrangements for relevant TV channels

To (Ofcom contact): Jacopo Genovese

Name of respondent: Dawn Marshall

Representing (self or organisation/s): Becoming Visible

Address (if not received by email): director@becomingvisible.co.uk

CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing

☒

Name/contact details/job title

☐

Whole response

☐

Organisation

☐

Part of the response

☐

If there is no separate annex, which parts?

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

☒

Name Dawn Marshall

Signed (if hard copy)



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