

Channel 4 response to Ofcom review of signing arrangements for relevant TV channels

Introduction

1. Channel 4 is a publicly-owned, commercially-funded public service broadcaster, with a statutory remit to be innovative, experimental and distinctive. Channel 4 was set up as a publisher-broadcaster, commissioning all of its content from the independent production sector rather than from an in-house base. Our not-for-profit model means that we work to maximise investment into remit, and in particular, high-quality, original UK content. In addition to the main Channel 4 service, Channel 4's portfolio includes E4, More4, Film4 and 4Music, as well as an ever-growing range of online activities that includes channel4.com, Channel 4's bespoke video-on-demand service 4oD and standalone digital projects.
2. Channel 4 is a public service broadcaster with a specific remit to cater to diverse groups within society. This has led to a powerful track record in representing disabled people on-screen – with programmes such as *The Undateables*, *The Last Leg*, *Bedlam* and the Bafta-winning *Paralympics* seeking to challenge social prejudices about disability. It has also ensured we committed to making our programming as accessible to as wide a group of individuals as reasonably possible. Channel 4 actively seeks to make its content accessible to those with sensory impairments – in 2013 providing the highest proportion of programmes with subtitling and audio description of all the public service broadcasters for the second year running as well as providing valuable slots for specially commissioned programmes for the Deaf Community.

Channel 4 and access services

3. Since 2011 Channel 4 has voluntarily been making 100% of its programmes on all our channels available with subtitles and audio-describing at least 20% of programmes (above the quota of 10%). Even these voluntary AD quotas of 20% have been exceeded – for example audio description was provided on 47% of all programmes on E4 in 2013 and 30.8% of all programmes on Channel 4. These figures were the highest figure recorded by Ofcom for any channel, and the highest of any PSB channel respectively. Channel 4 is also one of the few providers of subtitling and audio description on video on demand services via its 4oD service on Channel4.com.

4. Channel 4 also makes a significant contribution to the provision of signed content. In 2013 both Channel 4 and E4 exceeded their signing quotas (achieving 5.1% vs a quota of 5% and 5.2% vs a quota of 4% respectively). This included sign-interpretation of popular programmes such as *Hollyoaks*. More4 made a financial contribution to the British Sign Language Broadcasting Trust (BSLBT), and since 2010 the Film4 channel has provided a valued slot for the broadcast of specially commissioned programmes by the BSLBT – increasing the presence of BSLBT commissioned content on the Freeview platform and enhancing its audience reach and profile.
5. This provision demonstrates Channel 4's continued commitment to ensuring that sensory-impaired viewers are able to access and enjoy television content.

Support for the BSL community

6. Channel 4 is aware from previous research undertaken by Ofcom (2007 consultation on signing on television) as well as its own engagement with representatives from the Deaf community that many people in the Deaf Community prefer to view programming starring Deaf actors and presenters using their own language, rather than sign-interpreted programmes that were originally produced without signing. However, for broadcasters the costs of producing their own sign-presented programming are significantly greater than sign-interpreted programming, as well as being potentially alienating to the wider viewing audience who do not use BSL. The alternative arrangements whereby broadcasters are able to provide funding for independently produced programmes commissioned by the BSLBT, thereby ensuring BSL viewers have access to compelling quality content in their own language without disproportionate impact on broadcasters, has been an important and proportionate solution both for broadcasters and the BSL community that Channel 4 believes should be preserved.
7. Channel 4 believes that it is appropriate for broadcaster contributions to the BSLBT to increase in line with inflation (in line with the Consumer Price Index), rather than remaining flat at their current rate, to ensure it can continue to serve the needs of its audience. In terms of increasing costs beyond inflation – we believe that these should continue to be mindful of both the needs of BSL users and the impact on broadcasters. In particular, it is important that the costs of these alternative arrangements do not rise to such an extent that it is more cost-effective for broadcasters to replace sign-presented programming with sign-interpreted programming. This would have the unintended consequence of undermining

support for the BSLBT and potentially reducing the volume of programming created exclusively for the BSL community.

8. If Ofcom were minded to significantly increase the costs of these contributions, Channel 4 agrees that these should be introduced through a phased approach over time, to ensure that broadcasters are able to plan and budget accordingly.
9. Channel 4 hopes this submission is useful to Ofcom, and would be happy to discuss this and any other related issues if necessary.

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