

Title:

Forename:

Surname:

Representing:

Organisation

Organisation (if applicable):

Heart of Deafness

What additional details do you want to keep confidential?:

Keep name confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

Heart of Deafness comments on Ofcom Consultation on signing arrangements for relevant TV channels.

British Sign Language (BSL) is the main sign language used in the United Kingdom (UK) and is first or preferred language of some deaf people in the UK. Also, many thousands of people who are not deaf also use BSL, as hearing relatives of deaf people, sign language interpreters or as a result of other contact with the British deaf community.

Heart of Deafness (HoD) believes that BSL is underrepresented on mainstream television programmes. With Ofcom asking 6 questions; including whether the amount that broadcasters pay towards the production of BSL television programmes should increase and also whether the current requirement for the small TV channels to provide 30 minutes of BSL interpretation a month should increase, HoD is obliged to comment on these.

We believe that it is really important to increase the amount of programmes produced in BSL. Simply providing BSL interpretation is not sufficient to expose and further increase the popularity of this diverse language. Increasing the amount of programmes produced in BSL will further develop the rich quality of BSL as a language first. Also, increasing the quantity of BSL usage on television will help with the very important aspect of raising the profile of

Deaf people who use BSL and the exposure of BSL users on television is one core aspect to convey the beauty of the British Sign Language and the culture of Deaf people who use BSL.

HoD believes that in terms of the increase in contributions that TV companies should make to insure BSL interpretations, the quantity of BSL on television should be increased and as this increase will impact on costs, funding for production of BSL programmes should also be increased.

HoD believes that in terms of increasing percentage of programmes with BSL users/interpretation, this must be in parallel with numbers of programmes produced from a Deaf perspective BSL first - otherwise this increase becomes rather empty quotas exercise and would not impact changing the mindsets of the wider population.

It is very important to have BSL users on television programmes as this will further break down barriers, increases opportunities for full participation of Deaf people in employment, education and socially. This needs to be done to ensure an embedded approach from Educators - to have material available - i.e. programmes from a Deaf perspective.

We hope that the above will encourage Ofcom to act positively in its decision making process that will support and increase the exposures of BSL on television programmes.

Heart of Deafness, is a start-up social enterprise developing Deaf people to lead, influence and effect change alongside offering training, advice and support to a range of organisations to improve their capacity to meet the needs of Deaf people. Our aims to improve knowledge and understanding of how best to ensure and embed full access for Deaf people sit parallel to supporting young Deaf people to lead and influence, advocate and educate public sector bodies and services .

BSL is very important in the education sector in terms of profile, messaging and presence of Deaf people and role models and culture. Television is an accessible visual tool that BSL user can benefit from in developing their education and identifying role models and expanding Deaf Culture

Question 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?:

Not sure

Question 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?:

Not sure

Question 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?:

Yes. Making annual adjustments to the minimum contributions to alternative arrangements in line with the Consumer Price Index will enable the provisions of variety of programmes that can be accessed by BSL users.

Question 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. :

No. Deaf people are relying more on television now as opposed to the past. With the increasing number of deaf clubs closing, access to television programmes via BSL becomes more paramount. 30 mins a month should be raised rapidly over time.

Question 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?:

It appears that the transitional arrangements set out in Fig 4 would be appropriate, however, it is felt that 75 minutes of signed programmes a month is not sufficient in the light of 24hrs availability to daily mainstream tv programmes. 75 minutes a month is really small.

Question 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.:

No. It should not remain fixed at £20,000 a year as inflation changes so should the minimum contributions by relevant channels change. It should rise progressively in line with inflation.