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Forename:

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Name and title under which you would like this response to appear:

Chair

Representing:

Organisation

Organisation (if applicable):

British Deaf Association

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What do you want Ofcom to keep confidential?:

Keep nothing 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

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Question 1: Do consultees agree that these are appropriate policy objectives for Ofcom in considering possible alternative arrangements for signing on television?:

BDA is delighted that the present status quo of the BSL programme is recognised as not being in the best interest of the intended recipients, the sign language users, and support the policy objectives in where alternative arrangements are to be secured to better meet the needs of sign language users. Likewise, BDA supported the position that that amount of subtitling should not be impacted by any alternative arrangements. BDA accepts that the subtitling is a popular form of access for a majority of deaf people (all forms of deafness) but Sign Language users is our main area of interest and desire to see far more tangible progress than is currently evident.

BDA support the proposal to form a BSL Trust as an appropriate body in having the necessary knowledge and expertise with regards to ensuring that the sign language users are better represented and served, what we are questioning is that alternative arrangements only should be applied to the low-audience channels. Though would be happy to accept this as the first step of an ongoing commitment to better serve sign language users and that OFCOM would be advised by the BSL Trust who would be applying the litmus test of where sign language users are continually being sufficiently and appropriately served for all the channel providers.

Question 2: Do consultees agree that Ofcom has identified appropriate options?:

The three options (3.17) all focused around the low-audience channels, BDA within this set a range of options clearly prefers the third option in where alternative arrangements are to be found to enable sign presented programme/sign zone on a community channel. There is a need to sufficiently recognise the variety of issues with regards to the quality production of BSL programmes as presented in Becoming Visible's excellent document on the need for involvement and employing of Deaf people in editorial, production and technical aspects. As the scope for any alternative arrangements would be limited without factoring in the underlying issues, in which if not properly tackled, will limit the success of the quality of BSL-presented programmes being fully appreciated by sign language users.

Question 3: Do consultees agree with Ofcom's reasons for rejecting the ideas described in paragraph 3.18?:

Absolutely, we fully support the opposition to the signing requirement in programmes from Broadcasters to be dropped, as the Government recognised BSL as a natural language in its own right, and this move would be a serious regression of the government's commitment as well as of a great disservice to sign language users. BDA would be willing to consider any change to the requirement only if this will result in the tangible increase and quality production of sign presented programme as reported in the Ofcom document.

Question 4: Do consultees agree with the proposals outlined in paragraph 3.32?:

As this question, being the main content of the Becoming Visible's document which had the involvement and inputs from experienced professionals including a producer for Deaf programmes over a significant period of time, that there is need to reconsider the exclusion of Public Service channels and other Channels with 1% or more from the proposal. BDA support this position and relevant to the other answers provided, that the current arrangement in its entirety does not best serve sign language users, with rare exceptions such as See Hear. We are concerned that See Hear on a public service channel is reducing the viewing time for an important landmark programme of the Deaf Community, does show the need to maintain wider perspective. We do appreciate the thinking for possible exclusion of the film channel as it is not a suitable vehicle for sign translation and be considered along with the excluded low audience channels. Though a lot of programmes such as soap operas for example from 1 percent or more channel are also unsuitable in same token as the films.

Question 5: Do consultees agree that the aim should be to put any new arrangements in place from the start of 2008?:

BDA agree with the aims for the new arrangements to be put in place for the start of 2008, but as referred to in BDA's answer to Qu2 regarding the underlying issue of editorial, production and technical being properly grounded and accepted that the BSL Trust would largely be a suitable body in tackling this matter and would hope for the trust to be given sufficient time and leeway in carrying out their important remit.

Question 6: Do consultees have any comments on the impact assessment? Where possible, it would be useful for arguments about the cost of different options to be supported by relevant data.:

BDA would stress the importance of having a clear distinction between sign language users and the wider variety of deafness, throughout the assessment and any considerations in relation to subtitling and sign language programmes. This extends to the consultation period of OFCOM in where the reports are not presented in sign language, as it stands there is a question if sign language users are a proportionate majority of respondents in relation to important questions aimed at them? A number of sign language users do use BSL as first or sole language and it is important for this to be recognised.

However BDA is recognised widely as a leading national body in representing the Deaf Community and Sign Language users, and taking the stance that it is very important to bring to balance the question of costs and impacts, to properly include the socio-economical cost to the Deaf Community in exclusion from the full participation in programme production and viewing. Furthermore BDA would want to have a inputs from experienced professionals in producing quality Deaf/BSL programmes in gauging whether the budget/costs involved is sufficient.

Question 7: Do consultees consider that the proposed revisions to the Code are sufficiently clear?..:

Having presented our views with regards to having sufficiently considered the scope of inclusion of channel providers in the alternative arrangement, whilst accepting that the proposed change as a first step and a resolution to the current non desirable arrangement is preferred. The code as presented does seem to be clear to us as a non-broadcasting body and understand that this is only a voluntary arrangement for alternative arrangement but would wish for such arrangement to be monitored and BSL users be sufficiently involved. The BSL Trust would be a great move and BDA fully support this initiative.

Comments:

BDA is now more committed to ensure that the Deaf Community and BSL users will be at forefront of our work and will fully support the proposal for the BSL Trust to be set up and would hope that BDA can be actively involved in that and make our contributions best felt. The previous researches including in which BDA and DBC was involved is regarding the access to programmes for the Deaf Community is still very valid and we do not believe that any further delays or data would be needed to clarify the concerns felt by the Deaf Community. This is the time for action and BDA will be happy to support the work needed to move forward to best serve the Deaf Community in the 21st Century.