

**Ofcom  
Signing on Television – Proposed Changes**

**Response to consultation**

**July 2007**

**UK Film Council**

## Background

1. The UK Film Council is the Government-backed agency for film in the UK ensuring that the economic, cultural and educational aspects of British film are represented effectively at home and abroad.
2. The UK Film Council's role is to, "help make the UK a global hub for film in the digital age, with the world's most imaginative, diverse and vibrant film culture, underpinned by a flourishing, competitive film industry."
3. One of our policy priorities is "to help achieve a more diverse and inclusive workforce and film culture" and this priority informs our interest in the present consultation.

## Consultation questions

*Q1. Do consultees agree that these are appropriate policy objectives for Ofcom in considering possible alternative arrangements for signing on television?*

We accept that, on the evidence presented, it is appropriate "to exclude low audience channels from the current requirements under the Communications Act on the basis of the statutory criteria, and to identify and secure alternative arrangements that better meet the needs of sign language users, and do not impose disproportionate burdens on broadcasters." [para 3.5]

However, we note that "sign language users have said that signing does not work well with films" (footnote 11). For this reason we strongly support Ofcom's position that any new arrangements should not result in a "significant reduction in the amount of subtitling." [para 3.6].

Ofcom should not replace current regulation with any system which fails to guarantee a minimum level of signed programming output.

*Q2. Do consultees agree that Ofcom has identified appropriate options?*

Given that the options were informed, in part, by work of a sign language users working group, we believe that the options are appropriate.

*Q3. Do consultees agree with Ofcom's reasons for rejecting the ideas described in paragraph 3.18?*

Yes. As noted in this paragraph, the Communications Act does not permit the requirement for signing to be dropped in its entirety for all broadcasters, although specific exclusions may be made on the basis of the specified statutory criteria.

Public service broadcasters, in particular, have a leadership role to play in ensuring that their services are accessible to all the people of the UK. Ofcom is right to reject any idea that some or all of them should be excluded from their statutory obligations.

*Q4. Do consultees agree with the proposals outlined in paragraph 3.32?*

Yes. In particular we agree with the proposal in footnote 16 which states that "For example, given that sign language users have said that signing does not work well with films, we might decide to exclude a film channel with an audience share just above 1% from the current arrangements."

*Q5. Do consultees agree that the aim should be to put any new arrangements in place from the start of 2008?*

Looking at how the needs of the sign community are best met is sensible – but the timescale set by Ofcom risks poor decisions based on inadequate research.

Ofcom should consider changes to sign regulations in 2009, not 2008. That will ensure that all those with an interest – particularly deaf children – can have their views taken into account.

*Q6. 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.*

We have no comment on the impact assessment.

*Q7. Do consultees consider that the proposed revisions to the Code are sufficiently clear?*

Yes, we believe they are sufficiently clear.