



Communications Consumer Panel and ACOD's response to Ofcom's consultation on mandating emergency video relay

About us

The Communications Consumer Panel, established by the Communications Act 2003, is a group of independent experts with direct sectoral experience. We ensure the citizen and consumer voice is represented in communications policy development.

The Panel's job is to ensure that the sector works for consumers, citizens and micro businesses - and in particular people who may be in a more vulnerable position in society. We carry out research, provide advice and encourage Ofcom, governments, the EU, industry and others to look at issues through the eyes of consumers, citizens and micro businesses.

The Panel pays particular attention to the needs of older people and people with disabilities, the needs of people in rural areas and people on low incomes, and the needs of micro businesses, which have many of the same problems as individual consumers.

Four members of the Panel also represent the interests of consumers in England, Northern Ireland, Scotland and Wales respectively. They liaise with the key stakeholders in the Nations to understand the perspectives of consumers in all parts of the UK and input these perspectives to the Panel's consideration of issues. Following the alignment of ACOD (the Advisory Committee for Older and Disabled people) with the Panel, the Panel is more alert than ever to the interests of older and disabled consumers and citizens.

Our response

The Panel strongly supports mandating protections for British Sign Language (BSL) users, by adding to its General Conditions the requirement to provide video relay for 999 calls and zero rating the cost of the data required to make these calls.

We have urged that these protections were put in place for some time. Ofcom is required to ensure that communications providers provide equivalent services for 'end users with disabilities' and as stated in Ofcom's original consultation on this topic, for people whose first language is BSL rather than English, there is currently no equivalent access to emergency services.

Requiring BSL users to use text relay or emergency SMS is not a fair substitute. As Ofcom has illustrated in signed video case studies published in its website, the consequences for BSL users in emergency situations who have no way to contact the emergency services can be devastating.



We make no judgment as to whether communications providers provide the emergency video relay service themselves, or contract with a relay supplier or wholesaler that is qualified to handle emergency BSL calls. Debating further on this point would delay implementation and risk lives.

Zero rating data for emergency video relay calls

Having engaged recently and regularly with charities representing the needs and requirements of Deaf consumers and citizens, via the Panel's National Stakeholder Hubs, we strongly support Ofcom's proposal that data used for emergency video relay be zero-rated.

We understand that some Deaf consumers may already be paying a premium to ensure that they receive reliable and fast enough speeds for video calls - which has been particularly necessary during the pandemic, given that audio calls are not an option to them and arranging socially distanced meetings, including a BSL interpreter may not be possible.

BSL users should not have to risk harm - or their lives - because they can't afford to make an emergency call. We believe that zero-rating these calls is the equivalent of waiving the cost of 999 calls by hearing consumers; and it is simply the right thing to do.

We note that the debate around mandating emergency video relay calls has been ongoing for a number of years and technology has advanced during that time, so other ways of delivering equivalence may now be available. However, we believe that BSL users should not have to wait any longer for the protection that can be provided through emergency video relay.