



Communications Consumer Panel and ACOD's response to Ofcom's consultation on the future of public service media

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, including their representation and portrayal in public service media and the accessibility and usability of these media.

Response

The Panel welcomes the opportunity to respond to this consultation, in our capacity as ACOD members and members representing consumers and citizens in all of the Nations and Regions of the UK.

The Panel advocates that consumers, citizens and micro-businesses should have access to affordable, reliable communications services that suit their needs. The principle that no one should be 'left behind' is one of the Panel's core drivers, particularly in the context of the pandemic. As previously mentioned, connectivity not only encompasses access to infrastructure but also a consumer's skills and confidence to access services, engage online and take advantage of the benefits available.

Fairness

In response to Ofcom's recent consultation on its Plan of Work for the year ahead, we strongly supported its commitment to Fairness for Customers. We believe that in terms of public service media, audience members across the UK are customers and should be treated fairly. We highlight in this response our main areas of consideration by Ofcom to ensure that public service media is fair to all in the UK who want to access it:

Infrastructure and skills: Governments and Ofcom must make sure that services remain accessible to consumers across the UK, regardless of how they access them (traditionally through a TV or via the internet).

We also agree that it is vital that *‘Vulnerable groups, as well as those who don’t have access to the internet, are able to enjoy a broad range of information and entertainment, through public service broadcasting.’*

The impacts of the Covid-19 pandemic have proven how communications services including broadcasting have become integral to the everyday lives of consumers and citizens whether they need to stay in contact with family and friends, work from home, learn (or educate their children) remotely, watch a television series, or access news, public services information and/or healthcare.

The pandemic has propelled us into a digital world and polarised the digital divide, leaving some feeling ‘left behind’.

Reflecting the needs of consumers and citizens who don’t have access to the internet, or don’t have the skills and confidence to use it safely and benefit from it, stakeholders at the Panel’s [National Hubs](#) have warned that digital skills and literacy was an area of focus that Ofcom and UK governments needed to take seriously. They chose that topic as an area of special focus at the Hubs, where they shared research and formed collaborative links with other stakeholders.

Participants in more than one of our soon to be published research projects have told us of the digital connectivity challenges they have faced during the pandemic, which some seek to mitigate, while others are dissuaded from continuing to use digital services. We believe public service broadcasting services should continue to cater for those who cannot - or choose not to - access the internet and those who are unable to download apps.

Affordability

We welcome Ofcom’s continued attention to ensuring well-resourced and high quality public service broadcasting channels to serve the 1.5 million homes in the UK that do not have access to pay-TV, subscription streaming services, home broadband or smartphone.

Nations and Regions

We agree that it is vital that *‘Public service broadcasting reflects the UK’s diversity across its nations and regions’*.

We remain concerned that consumers living in remote communities are particularly vulnerable to becoming isolated and disconnected from the outside world where there is a poor connectivity and more rely on services such as their TV and radio to keep them connected with news, information, and social contact.

Portrayal and representation on and off-screen

Consumers and citizens living in all parts of the UK, including consumers who are older, and disabled consumers, should be able to find characters and situations featured on public service media that reflect authentically the way they live, work or study, without tokenism. We believe this requires clear leadership, with diversity and inclusion targets set in the objectives of senior executives and disabled, older and culturally diverse potential employees having access to opportunities to input into the creation of UK public service media.

Accessibility and usability

Public service media must be accessible to all members of the public. Providers of these services must comply with equality legislation. We believe they should go beyond this and ask audiences what they require - then accommodating those requirements by designing inclusive services.

We have responded to Ofcom's previous consultations on making on-demand services accessible

We agree with Ofcom's assertion that "public service broadcasting brings people together by creating shared national experiences [...] connecting generations and society as a whole through coverage of events and programmes watched by many millions" and we believe that everyone should feel included in those experiences, should they choose to be, regardless of their ability to hear or see those events. Access services should be provided for all and should be easy to use.

Early on in the pandemic, our stakeholders at our previously-mentioned National Hubs fed back their concerns about the lack of consistency of signing on UK news updates compared to the signing provision offered in specific nations and regions of the UK, in relation to public safety during the pandemic. We fed this back to Ofcom and governments.

As Ofcom is aware, approximately one in six members of the UK population is affected by [hearing loss](#), and almost 2 million living with [sight loss](#) both of which increase with age.

Quotes from participants in our independently-commissioned research 'Time to Catch Up' (2017) illustrate the benefits to individuals behind those numbers, of providing access services for the inclusion and integration of people with sensory loss:

"Subtitles do make a big difference, because you are able to keep up with everything that's going on. Even watching films, you can share with your friends, you can talk about it. Without subtitles, you can feel completely shut out."

Paula, 43, hearing impaired, London



“[Audio description is a] huge benefit because it’s like somebody reading you a story, and you’ve ...seen the story unfold and [can keep] up with it...”

Claire, 65, visually impaired, Scotland

For audience members whose first language is British or Irish Sign Language, signing is a better way of keeping up with programmes than trying to follow subtitles. Statistics recently published by the British Deaf Association for [Sign Language Week](#) also show that there are “approximately 151,000 BSL users and that 87,000 of these are Deaf”.

While they list 3,000 BSL users in Northern Ireland, they say there are also 1,500 Deaf users of Irish sign language in NI. The current access services rules make no provision for users of Irish sign language. We have recently been made aware of the impacts on this audience group by stakeholders in Northern Ireland and would encourage Ofcom to look at a more inclusive approach towards British and Irish sign language users.

In a convergent communications market, we also view the lines between services as more blurred than they once were. In the telecoms sector, we continue to push for providers to develop a consistent approach to identifying and recording data that will help them to understand the additional requirements of consumers who - on a permanent or temporary basis - fall under Ofcom’s definition of ‘vulnerable consumers’. We believe that this practice should form part of a service design approach across the communications sector that allows inclusivity to be ‘baked in’ and all consumers to have fair and equal access to the services they should expect.