

Church of Ireland Broadcasting Committee

Response to the Ofcom Revised Disability Action Plan

Due: 28 February 2010

The Broadcasting Committee of the Church of Ireland strongly welcomes the Revised Disability Action Plan produced by Ofcom for consultation in November 2009. The Committee also commends Ofcom for its participative consultation process and noted that the form of consultation followed was much more satisfactory than many other consultation processes in which the Committee has participated. The Committee particularly appreciated the opportunity to talk with Ofcom directly about some of the issues. This was informative for the Committee as a participant and we also felt that our comments were truly heard.

The Committee felt that Ofcom's Revised Disability Plan delivered across the 11 objectives identified, however the Committee particularly wished to make comments on certain of these objectives.

In particular, the Committee endorses the objectives around the promotion of positive attitudes towards disabled people and their participation in public life. The Committee felt that Ofcom is right to focus not only on the representation of disability in content, but also in the employment structure of communications organisations and, in the consideration given to the accessibility and usability of new technologies and the products based on them.

These issues apply equally to older people, and to many suffering the degenerative diseases of old age including arthritis, who can find themselves excluded from modern communications simply through inability to manipulate ever smaller devices and controls and from modern consciousness by their invisibility in content and mainstream employment.

A practical point that the Committee wanted to make is the difficulty that disabled and older people experience in accessing satisfactory service backup when the systems associated with new communications technology fail. This is true of broadband-based products and services across the range and often is complicated by a degree of consumer confusion between the product and the platform on which it relies.

One difficulty lies in identifying the right person or provider to contact and the extent to which they support the service provided. A further difficulty frequently experienced in respect of broadband services occurs when the service simply drops away. Sometimes the service reappears by itself. On other occasions something has gone wrong with the technology. The first dilemma is in respect of knowing when it is necessary to seek further assistance or simply sit and wait. The second issue that will confront the disabled and elderly is the nature of service support. Upon calling for assistance, the caller will frequently be asked to dismantle broadband connections in wall sockets so that the service provider can apply tests to establish whether the problem is on 'their' side of the wall or 'yours'. This is extremely difficult for anyone with mobility or dexterity issues, and in many cases, people who do not understand the technology will probably be concerned that they risk electrocution. Can this be made simpler?

A further issue relating to the tendency of broadband connections to go down unexpectedly, is concern that certain services for the elderly that support them in their own homes and are currently based around land line connections, may not provide the same level of reliability when

broadband replaces land line services. This has obvious implications for every family that relies on an emergency button, or monitoring equipment that helps maintain the safety of an elderly or disabled family member in their own home.

Therefore, the Committee wishes to make several points. If digital and broadband services are to become the norm, they need to be consistent in quality and availability in all parts of the country and easy to use and to maintain. Some means of prioritising support to the disabled and elderly is necessary, particularly where these people are dependent on daily support systems that use these platforms. Greater simplicity of delivery and service backup would be welcome. More attention is needed in respect of the design of connections and products to increase the ease of use by all of the population.

Media literacy is very important among older people and the pace of innovation in technology and products need to be matched by opportunities to learn at all ages. Greater emphasis needs to be placed on media literacy as a public service objective. While we know there is a national media literacy initiative in the UK, it does not have a high public profile. The Committee strongly commends Ofcom for emphasising media literacy as an objective.

Another major area of concern which the Committee was glad to see addressed in the Ofcom Plan is that of accessibility of media. In general, disabled and elderly are more likely to live on lower incomes than the average in the population. As commercial communications expands its range of services and products, so costs of participating have risen. The Committee urges Ofcom to push its objectives in respect of income-accessibility of goods and services.

One suggestion the Committee would make regarding these objectives is the possibility that Ofcom would challenge industry players to acknowledge excellence in respect of some of these objectives themselves. In the same way that the company 'Media Smart' is funded by the advertising industry to promote media literacy in certain respects, could a similar concept assist the communications industry to contribute to developing media literacy among disabled and older sections of the population? And could such a body acknowledge those companies and providers who develop products and services that deliver benefit to these (and perhaps other) groups?