Question	Your response
Question 1: Do you agree that a new regulatory framework for Public Service Media (PSM) delivery should support a more flexible 'service neutral' delivery approach that is more outcomes focused?	RNID (formerly the Action on Hearing Loss) is the largest charity in the UK representing people with hearing loss. We help people confronting deafness, tinnitus and hearing loss to live the life they choose, enabling them to take control of their lives and removing the barriers in their way. We provide information, advice and support for people with hearing loss, we campaign for equality and better services, and we support research efforts to find new treatments and improve the management of hearing loss. We are responding to this consultation as part of our on-going work on the Subtitle It! Campaign, which aims to improve access to TV for people with hearing loss 'whenever we watch it, however we watch it' and also on behalf of the Deaf community who rely on services delivered in British Sign Language (BSL). Within our response we focus on the provision of sign language and subtitles, though also acknowledge the importance of audio-description for people with visual impairments, including people with multi-sensory loss (such as people who are deafblind). Throughout this response we use the term 'people with hearing loss' to refer to people with all levels of hearing loss, including people who are profoundly deaf. Public service media (PSM) plays an important role in society, providing trusted news, creating shared national experiences and reflecting the UK's diversity. In this spirit we argue that is hugely important that access continues to be increased for people with hearing loss by expanding the provision of subtitles and sign content. By failing to deliver accessible content on Public Service Broadcasters (PSBs) we risk excluding people from important news items and the national conversation. You have said in your document that the universal reach and relevance of PSM are essential to deliver the benefits of the service, and as part of this accessibility for people with hearing loss is imperative. PSBs should lead the way for accessible content and should be models of best practice. We have stated our support for enhanced requirements

for PSBs in the previous Ofcom Consultation "How Should On-Demand Programme Services be Made Accessible" in 2020, we stated that PSBs could have a requirement to achieve close to 100% subtitled content in a shorter time frame to ensure that PSBs lead by example.[i] They could also use their prominent position in the media landscape in contract and distribution negotiates to ensure that accessibility is carried over onto external platforms.

We believe that obligations on providing accessible services should not be exclusive to certain services, and instead should apply across platforms. Greater choice over how to achieve accessibility targets may undermine the opportunity to expand the choice of content that people with hearing loss can watch with subtitles or signing. For instance, the failure to include signing on mainstream channels during covid-19 briefings meant that is was much harder for BSL users to understand the fast—changing developments during the pandemic and we have been repeatedly contacted by our community about this. Even though a signed version of the briefings was available on alternative channels and online, people struggled to access the information they needed.

Question 2: Do you agree with our proposals for a clear accountability framework?	We believe that PSBs should continue to fulfil their subtitle and sign language requirements as they are obligated to do under Ofcom's Code on Television Access Services. Any accountability framework should complement this and any further obligations resulting from the Digital Economy Act 2017, which extended Ofcom's regulatory power over subtitle obligations to on-demand content but is yet to be clarified but recommendations are expected soon.
	We also believe that PSBs should support innovation and development to improve and lower the cost of access services. It would be beneficial for them to report to Ofcom on their use of public money to research and develop better services, including for sign language, such as closed signing which viewers can switch on and off as they do with subtitle display options. This would be with the view that these solutions would benefit other providers and people with sensory loss.[ii]

Question 3: What do you think should be included in the PSM 'offer'?	
Question 4: What options do you think we should consider on the terms of PSM availability?	
Question 5: What are the options for future funding of PSM and are there lessons we can learn from other countries' approaches?	
Question 6: What do you think about the opportunities for collaboration we have referred to? Are there other opportunities or barriers we haven't identified?	We ask that opportunities for collaboration include building relationships between public service broadcasters and external platforms to ensure that public service broadcasting is accessible regardless of what platform you view it on. Currently we are aware that adding subtitles to content is a sticking point between broadcasters and platforms, and it would be beneficial for people with hearing loss if public service broadcasters could use their position to ensure that subtitles are available to the widest possible audience.[iii]
Question 7: What are your views on the opportunities for new providers of PSM?	Confidential? – Y / N

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[i] RNID, *ODPS Accessibility Consultation*, September 2020, available at https://rnid.org.uk/wp-content/uploads/2020/05/ODPS-Accessibility-Consultation-2018-AoHL-PUBLIC.pdf

[ii] RNID, *ODPS Accessibility Consultation*, September 2020, available at https://rnid.org.uk/wp-content/uploads/2020/05/ODPS-Accessibility-Consultation-2018-AoHL-PUBLIC.pdf

[iii] RNID, *ODPS Accessibility Consultation*, September 2020, available at https://rnid.org.uk/wp-content/uploads/2020/05/ODPS-Accessibility-Consultation-2018-AoHL-PUBLIC.pdf