



The Communications Consumer Panel and Advisory Committee for Older and Disabled People's response to DCMS' consultation on a change of ownership for Channel 4

Background

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.

Response

We welcome the opportunity to respond to DCMS' consultation, as a representative of audiences of public service broadcasting whose voices may traditionally be less heard in broadcasting policy.

We respond in line with our remit to support equivalent access to broadcast and on-demand content by audience members who require access services; and by consumers across the full diversity of Nations and Regions of the UK (while we also recognise that S4C is not within scope of this consultation).

DCMS wants to hear from respondents on what the economic, social and cultural costs and benefits might be to moving Channel 4 out of public ownership. We see no example of potential benefits in the consultation document. We are concerned that there will be social and cultural costs in terms of cultural awareness and social empathy and urge the government to ensure that Channel 4's focus on diversity and inclusion is maintained under any new arrangement.

Channel 4 plays a different role to other public service broadcasters, enabling it to spotlight issues, offer a fresh perspective and break down stereotypes, encouraging open debate. In

the introduction to this consultation, DCMS states that Channel 4 *“has successfully delivered on its remit, aims and objectives since it began broadcasting almost 40 years ago”*. We are keen to see this success safeguarded and maintained and therefore make the following points in response.

Plurality of audience voices for cultural awareness and social empathy

Nations and regions

We believe that whatever future model is chosen for the running of Channel 4, it must protect the plurality of audience voices across the UK. We recommend a safeguarded target of at least 9% spend in the Nations, as a published commitment by which the entity can be held accountable. Four members of the Communications Consumer Panel are nominated as statutory ‘National’ Members, representing each of the four UK Nations, and the diversity of regions within; our National Members are keen to ensure that Channel 4 continues to represent the people and businesses of the whole of the UK, both on-screen and behind the camera.

Portrayal of disabled people/persons with disabilities

We welcome the work Channel 4 has put into improving the portrayal of disability and representation of disability, in recent years:

Audio Description awareness campaigns with the RNIB have enabled visually impaired audience members to engage with a range of programmes that they would not have been able to experience with this access service - the latest campaign has, we hope highlighted recent improvements in the quality of audio description so that users who may have found earlier versions less than satisfactory can enjoy TV again;

Channel 4’s ‘Year of Disability’ in 2016 raised the bar, with a focus on casting disabled people in roles based on character, rather than simply a story about their physical impairment, aiming to smash the stereotypical on-screen portrayals of ‘tragic victims’ and ‘awe-inspiring superheroes’, by enabling disability to be depicted on-screen as a fact of everyday life; and

Channel 4’s coverage of the 2012 Paralympics broke new ground, and this has continued through to the 2020 event (held in 2021). The Channel 4 Paralympics coverage has celebrated the successes of many athletes who would not previously have had any TV coverage and has the recent campaign has struck a balance between showing the human stories of the competitors and the superhuman athletic feats they have achieved, with record medal numbers won. It is vital that the cultural step change that has taken place in disability portrayal recent years, in which Channel 4 has played a key role, is not eroded by a focus on finance.

Access services - subtitling, audio description and signing

As referred to above, access services perform a vitally inclusive role, enabling equivalent access to broadcast and on-demand content.

The Panel's 2017 research and recommendations in its report '[Access to broadcast and on-demand content: Time to Catch Up!](http://www.communicationsconsumerpanel.org.uk)' (www.communicationsconsumerpanel.org.uk) highlighted the need for on-demand programme services to be brought in line with the access services requirements placed upon traditional broadcasting. We urged that broadcasters work with content providers and distributors, and all others with a role in the delivery chain between script and audience, to ensure audience members with sensory impairments were able to access the same programme services as their peers. We have been pleased to see action taken by the Government to give Ofcom powers to implement an Access Services Code for On-Demand Programme Services.

We believe that the targeted number of viewing hours with access services that currently apply for Channel 4 should remain, because we believe that it cannot be taken for granted that a change of ownership will lead to a continuation of inclusive and proactive culture; a loss of corporate memory for the good practice that Channel 4 has taken part in to this point could be harmful for many members of Channel 4's audience.

We believe it is important to UK society as a whole that disabled people are not excluded from everyday interaction, information and learning, by inadequate access services provision. The significance of maintaining high standards of access service provision are explained by two of our research participants:

"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 loss, 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

Channel 4's published commitments on diversity of workforce

The Panel has a dual role with Ofcom's Advisory Committee for Older and Disabled people and as such can advise Ofcom on diversity and inclusion matters regarding age and disability. We have encouraged Ofcom to set testing targets for its own workforce breakdown, to ensure representation of older and disabled people in its workforce.

We note that Channel 4 has stated publicly that its ambition is that, by 2023, its workforce is composed of no fewer than 12% disabled colleagues, with 9% on-screen representation.

We would like to see any new owner at least meet these targets, if not exceed them and for any new owner to design their external and internal processes and policies in a way that attracts and develops talented disabled people. A quote from the mother of a 4-year old child with cerebral palsy, on allowing her daughter to take part in a Channel 4 programme

eludes to the significance of on-screen representation for the youngest generation and their parents:

“I do hope it will raise awareness for disabled children and it will also raise awareness for parents not to hold their children back from anything. That it doesn’t matter what your child looks like or how tall they are or whether they have a disability or not, they have a right to be a child and that’s that. Don’t hold them back.”

<https://www.channel4.com/media/documents/corporate/YearOfDisabilityBooklet.PDF>

Encouraging diverse and inclusive participation in this consultation exercise

We trust that DCMS has engaged widely with stakeholders across the UK via a range of accessible channels, including social media and has not made the assumption that all consumers, citizens, businesses, charities and others with an interest in Channel 4 will automatically be aware of the consultation and able to locate it online. If they have not done so already, we would urge DCMS to ensure that all who may be affected by a change of ownership have a chance to comment.