Dear Ofcom,

Thank you for inviting us to respond to the consultation in your email.

I am writing to propose a significant enhancement to your Access Services Code and associated best practice guidelines, with the objective of fostering inclusivity and accessibility for individuals with sensory impairments, specifically those with Autism, learning disabilities, or complex communication challenges. Our mission is to ensure that disabled individuals can comprehend and appreciate television and on-demand programs on an equal footing with the wider audience.

Currently, broadcasters are legally obligated to furnish access services for a specific portion of their programming. The Access Services Code delineates the requirements for broadcasters, while the best practice guidelines provide counsel on ensuring the quality and user-friendliness of these services. However, there exists a noticeable gap in serving the needs of the 1.5 million-plus community of people with Autism, learning disabilities, or other complex communication challenges.

Makaton, a versatile and widely recognised communication tool, plays an indispensable role in bridging this gap. It is essential to acknowledge that while Makaton serves a different audience than British Sign Language (BSL), both communities - the deaf community and those with Autism, learning disabilities, or communication difficulties - deserve equal access to broadcast content. The distinction between these two communication tools is paramount, as they cater to distinct needs.

Currently, over 100,000 children and adults rely on Makaton symbols and signs, either as their primary mode of communication or as a supplementary tool to support speech. Moreover, Makaton is increasingly being used by educators, healthcare professionals, friends, public service bodies, and the public to facilitate communication. Its versatility extends to individuals who struggle with understanding concepts, possess poor literacy skills, including grammatical knowledge, or have English as an Additional Language. Makaton empowers individuals of all ages to actively engage in various aspects of life, as communication and language are fundamental to human interaction and learning.

Unfortunately, serving people with learning disabilities to access broadcasts does not appear to be a top priority in the current landscape. To rectify this oversight, we propose the following initiatives:

Diversification of Accessible Programming: Encourage broadcasters to produce a more extensive range of accessible programmes targeted at individuals of all age groups. Currently, there is a notable lack of accessible content for older children and adults with complex communication needs, aside from CBeebies' "Something Special," which primarily caters to preschool-age viewers.

Accessible Technology Development: Collaborate with industry stakeholders to develop and promote accessible technology solutions that support individuals with communication needs in their viewing experiences. This expansion will ensure that accessibility considerations are integrated across all content platforms, with a primary focus on enhancing outcomes for audiences. Our approach involves harnessing a variety of technologies, and we are currently partnering with SKY to pioneer services that:

Serve People with Cognitive and Neurodevelopmental Disabilities: Develop content and services tailored to the unique needs of individuals with cognitive and neurodevelopmental disabilities.

Customization, Options, and Choice: Provide viewers with customisation options to enhance their viewing experiences.

In conclusion, Makaton holds the potential to be a transformative force in rendering television and on-demand programming accessible to individuals with Autism, learning disabilities, and communication difficulties. By incorporating Makaton into your Access Services Code and best practice guidelines, you can take a significant step towards ensuring that every member of our society, regardless of their communication needs, enjoys equal access to the world of television and on-demand content.

We are eager to collaborate with Ofcom in this endeavour, leveraging the power of Makaton to break down communication barriers and foster a more inclusive media landscape. Together, we can make a profound difference in the lives of countless individuals who have long been marginalized in their access to broadcast content.

Thank you for your time and consideration. We look forward to the opportunity to discuss this proposal further and work collaboratively to enhance the accessibility of television and on-demand programming for all.

Sincerely,



Zanna Finnerty

Director of the Makaton Language Programme