



British Broadcasting Corporation

Disability Equality Scheme

Foreword by the Acting Chairman of the BBC

Disability Equality Scheme

The publication of the BBC's first 'Disability Equality Scheme' in December 2006 was an important milestone as is this, the second issue of the Scheme, published in April 2007.

On 1 January 2007, the BBC's Board of Governors was replaced by the BBC Trust. This was much more than a name change: the Trust is responsible for representing the interests of **all** licence fee payers and is mindful that disability creates a wide range of (special) circumstances. The Trust must ensure that disabled people are heard and we must engage with disabled audiences in ways that suit them best. In May 2007, we will be consulting with the public on how we should engage with audiences and we will make every effort to ensure that disabled people and their carers are included in that consultation. In the meantime, the Trust's initial plans under the Scheme are set out in this document.

The BBC Executive has an established track record in this area. A number of activities have been agreed through its participation in the Broadcasting and Creative Industries Disability Networks, details of which are included in this document.

The Trust has a duty to report to the public and explain all of our decisions to **all** of our audiences. The BBC is committed to the principle of 'disability equality' in relation to its public functions, and the Trust will continue to consult the public in order to maintain and review the Scheme as described in this document.

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I. Introduction

I.1 The BBC

The British Broadcasting Corporation (BBC) is established as a corporation by Royal Charter. The first Royal Charter was granted on 20 December 1926 and the BBC has subsequently been continued by further Royal Charters, the most recent of which was granted on 19 September 2006; this continues the Corporation for a period of 10 years from 1 January 2007.

The Royal Charter essentially defines the powers of the BBC and its constitutional arrangements, and states that the BBC is to be independent in all matters concerning the content of its output, the times and manner in which this is supplied and in the management of its affairs.

The most recent Charter was granted after a lengthy and detailed process of public consultation spanning several years. The process included publication of a Green Paper and a subsequent White Paper by the Department for Culture, Media and Sport.

In addition to the Royal Charter, the BBC has entered into a Framework Agreement with the Secretary of State for Culture, Media and Sport. This Agreement deals with a number of important matters, including the following:

- A statement of the services which the BBC is to provide at the commencement date of the Charter
- The process which is to be followed for subsequent additions or changes to the BBC's public services, including the use of the Public Value Test under which the public value of the BBC's services is to be compared with any potential market impact which a new or varied service may have
- The obligations on the BBC in relation to the achievement of digital switchover
- The regulatory obligations which apply to the BBC UK public services
- The arrangements relating to the provision of the World Service
- Fair trading and competitive impact provisions
- The BBC's commercial services
- Complaints
- The BBC's relationship with Ofcom, and

- A number of other miscellaneous and general matters

The BBC is mainly funded by the television licence fee, the collection of which by the BBC is authorized by section 365 of the Communications Act 2003; after collection the BBC is obliged to pay the sums received to the Government. Under the terms of the BBC Agreement, sums equal to the amounts collected by the BBC are paid to the BBC, after deduction of the Government's administration costs. The World Service is funded separately by the provision of grant-in-aid from the Foreign & Commonwealth Office. There are also separate divisions and companies which operate at arm's length from the BBC. These carry out a number of commercial activities (for example, the sale of magazines, books, DVDs and CDs); the profits arising from these activities are returned to the BBC and used in support of licence fee-funded services.

1.2 The New BBC Charter and Agreement

The BBC was, we believe, unique amongst the public authorities to which the Disability Equality Duty applies, because it is in the position of having to introduce this Scheme at the same time as introducing an entirely new constitutional and governance arrangement under the terms of its new Charter and Agreement. In particular, the replacement of the BBC Governors by the new BBC Trust has resulted in the introduction of a large number of new functions, many of which are public functions which have not been exercised previously. There are also additional functions for the BBC as a whole, for example relating to digital switchover.

For this reason the Action Plan contained within this Scheme sets out a series of actions that the BBC believes are appropriate in respect of its public functions, which will be addressed during the three years of its operation. These actions will be updated and amended annually as necessary, having regard to ongoing feedback from involvement with disabled people.

2. The Disability Equality Duty

2.1 The Disability Discrimination Act 1995 (as amended) (the "DDA")

The DDA was amended in 2005 so as to require public authorities to fulfil a Disability Equality Duty. This duty encompasses requirements:

- To promote equality of opportunity between disabled persons and other persons
- To eliminate discrimination that is unlawful under the Act
- To eliminate harassment of disabled persons that is related to their disabilities
- To promote positive attitudes towards disabled persons
- To encourage participation by disabled persons in public life, and
- To take steps to take account of disabled persons' disabilities, even where that involves treating disabled persons more favourably than other persons

The Disability Equality Duty applies to most public authorities in respect of all of their functions. However, in the case of the BBC, it only applies “**in respect of its public functions**”. This means that not all functions of the BBC are subject to the requirement to fulfil the Disability Equality Duty.

The BBC believes that the correct approach to defining its public functions is to look at the nature of the function involved rather than the nature of the body carrying out the function or the nature of its funding. For this reason, regulatory functions are likely to be public functions, whereas the BBC’s output-related activities (eg newsgathering and programme making) are not.

The application of general principles of this type to specific situations involves detailed analysis, which it would not be appropriate to set out in this document. However, the result of the analysis that has been carried out, ie a definition of those functions of the BBC which are considered to be public functions, is set out in the Annex to this Scheme.

Section 3 of this Scheme sets out what the BBC intends to do in order to fulfil the Disability Equality Duty in respect of each of these functions.

In addition, section 8 of this Scheme sets out the BBC’s broader approach to promoting disability equality. Various specific actions and targeted initiatives are detailed as well as examples of more long-standing and routine good practice across the BBC. Although these are not requirements under the Disability Equality Duty, which relates only to public functions, they do nevertheless demonstrate the BBC’s positive and inclusive approach towards disabled people as employees, audiences and TV licence fee payers, as well as its clear intention to fully meet additional specific duties relating to equal opportunities, which are placed on it by the BBC Charter and Agreement (ref. Charter Article 44: (1) a & b and (2) b and Agreement Clause 83).

3. The BBC’s Disability Equality Scheme

The BBC’s Disability Equality Scheme forms a part of the BBC’s overall commitment to equality and diversity. The scheme outlines a framework for how the BBC will develop, implement, monitor and review its work towards achieving equality for disabled people (and their carers), in relation to its relevant public functions. The Scheme is a tool to help promote disability equality at the centre of the BBC’s work and specifically across relevant areas such as TV licensing, digital switchover and the BBC Trust’s operations.

The BBC’s Disability Equality Scheme aims to build on a strong foundation of existing good practice and expertise. The BBC has always sought to address any identified gaps and barriers to delivering fair, accessible and appropriate services. It has also sought to protect the rights of disabled people both at work and in the wider community and to engage with them in order to understand their concerns and meet their needs wherever possible. This Scheme, therefore,

aims not only to ensure full compliance with the general duty with regard to the BBC's public functions, but also to provide some information relating to the BBC's previous and current efforts to ensure equality of opportunity and access for disabled people (albeit that this does not technically form part of the Scheme).

4. Key Elements of the BBC's Disability Equality Scheme

The Disability Rights Commission has set out five key elements or principles on which the Disability Equality Scheme should be based. Under each element there is a list of ways by which the BBC will work to deliver its commitment to disability equality. The five key elements are:

- 4.1 Involvement
- 4.2 Action Plan
- 4.3 Performance Monitoring
- 4.4 Assessment
- 4.5 Review

4.1 **INVOLVEMENT** – A statement of how disabled people have been involved in developing the Scheme

All Disability Equality Schemes are required to be updated in the light of experience and ongoing involvement with disabled stakeholders; this will particularly be the case in relation to the BBC's Scheme. The BBC is committed to continually reviewing and developing its Scheme so as to maximise its relevance to the delivery of real benefits for disabled people in relation to the performance of the BBC's public functions.

The first draft of this Scheme was developed during the autumn of 2006, against a constitutional background which was being clarified and finalised at the same time. An expected outcome of this process was that there would be a substantially different analysis as to the nature of the BBC's public functions (as set out in the new constitutional arrangements of the BBC's new Charter and Agreement). For this reason any meaningful involvement of disabled stakeholders during the Scheme's very initial development was necessarily limited during that period.

4.1.1 Previous and Recent Involvement of Disabled People

The BBC had, however, previously involved and consulted disabled people in a number of ways with regard to the performance of the public functions which are now covered by the Scheme. These initiatives are listed below:

- BBC Trust
- Charter review consultation
- Television licensing
- Digital switchover and Digital UK
- Consulting disabled BBC staff

(See also section 4.3 for details of the BBC's involvement and information gathering activities.)

The outcomes of this previous involvement and consultation have informed the Scheme and in particular the Action Plan.

4.1.2 Disabled People's Involvement with the Development of the Disability Equality Scheme

This newly reviewed Scheme (February 2007) is informed by the outcomes of planned involvement activity with disabled people, which was carried out as part of the Scheme's development. The activity was conducted through questionnaires and focus group meetings during the course of November 2006 and was launched following the final settlement of the BBC's new constitutional arrangements by means of the grant of the new BBC Charter. The outcomes of this planned involvement activity have now been considered by relevant sections of the BBC. Details of the involvement activity and the headline findings are reported below and reflected within the Action Plan as appropriate.

Involvement Process

The BBC retained the services of specialist consultants Churchill, Minty & Friend to help with the design and implementation of an involvement strategy.

The first phase of this, which was implemented during October and November 2006, involved a questionnaire which was made available via post, in accessible formats (on request) and via the BBC Ouch! website. The survey canvassed the views of disabled people about each of the areas identified as public functions. In addition, four focus groups were held in London, Manchester, Edinburgh, and Cardiff (a specific focus group was held in Cardiff for people with learning difficulties/disabilities).

To promote participation and enable some disabled people who were unable to attend the focus groups to have their views heard, an advertisement was placed in Disability Now magazine, which reaches a number of disabled people nationally. Respondents were offered the chance to win a pair of tickets to visit the BBC studios. The questionnaire was also promoted via an electronic contact list held by Churchill, Minty & Friend. Provision was made to offer

support via telephone for those who wanted assistance to complete the questionnaire, along with an invitation to attend a focus group for those who find questionnaires inaccessible.

A number of known disabled individuals and organisations were contacted and invited to attend the focus groups. This sample had a diverse makeup with people representative of a range of impairments, access needs and specific knowledge within a given disability arena. Significantly, these stakeholders represented a number of national and local disability organisations. Efforts were made where possible within a disability equality context to explore the diversity of the disabled community to reflect the different access needs experienced by certain impairments groups.

The focus groups were designed to explore concerns, barriers and the experiences of disabled people with respect to the BBC public functions included in the Scheme. The BBC made the necessary arrangements to ensure that the focus groups were accessible, eg by providing induction loops, speech to text and BSL interpretation, as well as funding transport costs. All disabled participants were given a small token payment for their assistance with this project, in line with DRC good practice guidance.

Involvement Findings and Further Action

The various BBC teams which manage the public functions involved have considered the outcomes of this work carefully and agreed priority actions, which are now included within this updated Disability Equality Scheme.

The findings reflect disability within the context of perceptions and experiences of engagement with the BBC in relation to three specific areas of focus:

- TV licensing (a public function)
- Digital switchover (a public function)
- Involvement (disabled people's perception of the BBC and involvement with the Trust in particular)

Some overarching themes emerged in relation to all three areas, including:

- **Communications** – for example, issues were raised about the benefits of digital broadcasting to enable audio description; whilst BSL interpretation and subtitling and the provision of written information formats were identified as presenting access issues across all three areas.
- **Representation and involvement** – of Deaf/disabled people.
- **Publicity** – about BBC activities by the relevant public functions, with specific regard to disabled people and how the needs of this section of the BBC audience are met.

- **Information resources** – are they appropriate/accessible enough to encourage disabled people to make informed decisions when engaging with services and/or changing digital equipment?

Television Licensing – Summary of Key Issues

Access

- Most people found it accessible to purchase their TV licence.
- Barriers identified included some PayPoint outlets and whether people have access to bank accounts, etc.

(NB: The latter issue will be helped by the Regulations change on 1 April 2007, when cash payment schemes become available to all, not just to those on income-related state benefits.)

Equity/Fairness

- Some confusion existed in relation to the Blind concession.
- There was debate about whether charging was fair for people who are visually impaired and/or Deaf.

(NB: Concessions are defined through legislation but the debate may highlight a communications issue.)

Contact with Customer Services

- The TV Licensing team does not have the means to support communication with people who use British Sign Language (BSL).
- There is a perceived lack of awareness of diverse additional needs.
- Some examples of positive experiences were highlighted.
- Improvements suggested including training/developing preventative programmes to educate some groups who may fail to pay their licence fee, such as people with learning difficulties.

Digital Switchover – Summary of Key Issues

Awareness

- Most people were aware that changes were taking place.
- There were some concerns about lack of awareness in other sections of the disabled community, for example elderly parent carers and/or elderly disabled people.
- Targeted information provision could address information/knowledge gaps (for example clarification over the radio changes; Teletext; greater promotion of suitable, affordable equipment which meets specific needs such as digital boxes which enable subtitling and audio description).
- Concerns included identifying difficulties in setting up equipment and ensuring services are compatible with environmental controls.
- Cost was another area of concern.

Information

- This needs to be provided in suitable formats and must address the (often more specific) questions of this target audience.

Involvement – Summary of Key Issues

Approachability / Access

Quantitative data suggests that disabled people in the sample feel the BBC is approachable. However, barriers include determining how disabled people can approach the BBC, for example:

- Telecommunications – difficulties not just in gaining access to a textphone number but also the customer service team not being able to respond to an incoming textphone call.
- Complaints – general dissatisfaction with BBC responses to complaints made and perception that the organisation does not recognise, acknowledge and represent lifestyles and/or issues of disabled people.
- Engagement events/initiatives – involvement with consultation events and panels was limited and perceived as tokenistic.
- Perception that there was never any feedback from consultation undertaken.

General Perceptions – A Summary

Overall, disabled people who engaged in the study felt:

- The BBC was a very good organisation, but it fails to recognise disability equality sufficiently.
- There were a number of good things identified about what the BBC is currently doing but little is communicated.
- Improved communication, regular involvement and published feedback is needed.
- Sustainable involvement should be a process of long-term engagement.
- Sustainable involvement should also be a shared learning experience between key disabled representatives and the BBC.
- All interaction and/or engagement points should be reviewed in terms of encouraging accessible communication, including the promotion of opportunities.
- The BBC should aim to disseminate information to this section of the BBC audience.
- Many of those who participated in this study expressed an interest in engaging in such an involvement process.

4.2 THE ACTION PLAN

The BBC Action Plan in respect of its public functions consists of three main sections. These are television licensing functions, certain functions of the BBC Trust and certain functions of the BBC under the BBC Agreement.

4.2.1 Action Planning and Review

The Action Plan is based on the outcomes of involvement and consultation with disabled people and staff and on the outcomes of disability Equality Impact Assessments. The key areas that emerged, which were found to be of most importance or concern to disabled people, varied depending on the public function under discussion (see 4.1 above for more detail). The Action Plan sets out the steps which the BBC intends to take during the first year of the Scheme, to address these key areas and work towards ensuring disability equality in relation to its public functions (see pages 29–62 for Action Plan).

The Scheme runs for three years from 4 December 2006 to 3 December 2009, and all objectives contained within it should be met by the end of the third year. The Scheme and its Action Plan in particular will be subject to regular updates and formal annual reviews.

The BBC will continue to consult with and involve disabled people in order to monitor its operation and assess the impact of actions implemented. Feedback will inform the annual review process and help the BBC to update or set new actions to meet its disability equality objectives over the Scheme's three-year period. (Details of the way in which disabled people will be involved are set out in section 4.4.) The BBC will review and, if necessary, update and amend the manner of involvement based on an evaluation of how successful these processes have been.

During the third year of operation of the Scheme, the BBC will conduct a more detailed review of the steps taken over the entire period to decide what actions are appropriate in respect of the BBC's public functions thereafter. These actions will then be incorporated into a new Scheme.

4.2.2 Ownership and Implementation

The BBC Trust is responsible for overview and scrutiny of the Disability Equality Scheme (DES). The three-part Action Plan embedded within the Scheme is the responsibility of the Director-General and other members of the BBC Executive Board within the BBC Divisions; of and the Trust Unit. The pan BBC Diversity Centre is responsible for liaising with relevant divisions, disseminating best practice and providing guidance, and monitoring progress of the Disability Equality Scheme Action Plan at corporate level.

Each relevant Divisional Director is responsible for implementing the DES and the specific local actions, which have been identified as a result of consultation and equality impact assessments at divisional level. These will be monitored within each division and progress will be reported at the Diversity Board and Executive Board. Implementation of the DES is scrutinised by the BBC Trust.

4.2.3 Structure and Content

The Action Plan is divided into the three public function areas of the BBC's activity:

- Television licensing functions
- Certain functions of the BBC Trust
- Certain functions of the BBC under the BBC Agreement, eg digital switchover

Within each section, key objectives have been set which aim to achieve the positive outcomes that disabled people and their carers have identified as most important to achieving disability equality. Specific actions support one or more of the Scheme's key objectives, which are all underpinned by core BBC values relating to diversity. Actions have been informed directly by disabled people and/or arise out of recommendations made following a range of engagement and consultation initiatives plus various initial reviews of current activities.

Background information on each of the relevant function areas and examples of how the BBC carries out, or intends to carry out, each of the public functions covered by the Scheme has been provided as part of the introduction to each section of the Action Plan.

4.3 PERFORMANCE MONITORING – Arrangements for gathering information about performance of the BBC on disability equality

This section provides examples of how the BBC gathers information on its own performance through examining its current activities and function processes and by investigating the specific needs and/or barriers to access, which may be identified through the outcomes of involvement with disabled people and other relevant research.

Information and evidence gathered will now be used to:

- Inform Disability Equality Scheme review processes and any additional work areas which fall outside its scope
- Benchmark against other broadcast industry providers and allow for broad comparison against a range of other public bodies where appropriate
- Systematically identify barriers and gaps, which may impact negatively on disabled people
- Understand and wherever possible respond appropriately to diverse and constantly changing needs
- Examine and assess outcomes
- Inform future planning processes target setting, where appropriate

Previous and Current Information Gathering

4.3.1 Television Licensing

“TV Licensing” is a trading name used by companies contracted by the BBC to administer the collection of television licence fees and enforcement of the television licensing system¹.

¹ The majority of the administration of TV Licensing is contracted to Capita Business Services Ltd (which undertakes the majority of the TV licensing system), with the administration of cash-related payment schemes contracted to Revenue Management Services Ltd (RMS). PayPoint Collections Limited are contracted to provide over-the-counter services. The marketing and public relations activities are contracted to the AMV Consortium. The consortium is made up of the following four companies: Abbott Mead Vickers BBDO Ltd, Fishburn Hedges Boys Williams Limited, PHD Media Limited and Proximity London Ltd. The BBC is a public authority in respect of its television licensing functions and retains overall responsibility.

Regular and Targeted Involvement

The BBC and TV Licensing (TVL) have been working with a number of key stakeholders to both gather and share information. In particular there is a regular dialogue with the Royal National Institute for the Blind (RNIB), Age Concern, Help the Aged and Citizens Advice. (Age Concern, Help the Aged and Citizens Advice all liaise with organisations which represent disabled people.)

Information is gathered and planned changes in TV licensing processes are discussed so that the views and needs of disabled people help to shape developments. These processes have resulted in, for example:

Actions:

- The Over 75s licence is now produced on different coloured paper to make it easier to read, and information about the licence is provided in a larger print, following liaison with RNIB and Help the Aged.
- During the transition to new PayPoint-delivered TV licensing services, plans to require the use of a PIN number with the savings card were discarded as it was clear that it would be more difficult for some customers to use.

TV Licensing also liaises with housebound customers to gather information about their specific needs or the sorts of barriers they may face in order to find the most appropriate way for them to make payments, even if Direct Debit or other payment methods are not available to them.

4.3.2 BBC Trust

The new BBC Trust is supported by the BBC Trust Unit which in January 2007 took over from the Governance Unit, which had supported the BBC Governors previously.

Specific Consultation on the New Governance Framework Embedded in the Charter and Agreement

The Government carried out extensive public consultation connected with the transition to the Trust. The BBC's Governance Unit also offered disabled licence fee payers the opportunity to meet with Governors and tell them first hand what they thought of the BBC's programmes and services. This resulted in the following:

Actions:

- The new Trust's proposed actions (see Action Plan part 2) reflect the information gathered and seek to address the issues raised.
- The Trust is required to develop and consult upon a "protocol" on engagement with audiences. The issue of accessibility for a diverse range of disabled people will be integrated into the document, which will itself go out for public consultation.
- The Trust will ensure that the involvement of and accessibility for disabled people in the BBC's Audience Councils will be a fundamental feature of the operation to be set out in the relevant BBC Trust protocol.

4.3.3 Digital Switchover and Digital UK

In September 2005, the Government announced that digital switchover will take place between 2008 and 2012. Digital switchover is the process of changing the television broadcasting network to digital. It will involve converting the current analogue television network, as well as encouraging the public to convert or upgrade their TV and recording equipment so they can receive digital television.

A Ministerial Group on Digital Switchover has been set up to manage digital switchover. The Ministerial Group meets around four times a year and is co-chaired by the Department of Trade and Industry (DTI) and the Department for Culture, Media and Sport (DCMS). The Ministerial Group also includes representatives from Digital UK, Ofcom, DTI, DCMS, public service broadcasters (BBC, ITV, Channel 4, Five, S4C and Teletext), non-terrestrial platform operators, consumer bodies, retailers, manufacturers and the consumer bodies, retailers and manufacturers.

Digital UK is the independent, non-profit organisation set up at the request of the Government to manage all communications with the public regarding digital switchover. Digital UK provides impartial information on what people need to do to prepare for the move to digital television. Digital UK is owned by the UK's public service broadcasters and transmission companies SDN and National Grid Wireless.

Digital switchover is a public function for the BBC and the BBC is a key stakeholder in many elements of the digital switchover programme being managed by the Ministerial Group. Digital switchover communications are part of the public function of the BBC and, as mentioned above, this work is being managed and implemented by Digital UK.

As well as managing the communications for digital switchover, Digital UK is also working with digital TV platform operators, equipment manufacturers, installers, retailers, rental companies and consumer groups to coordinate the technical rollout of digital television across the UK.

Digital UK is consulting with a number of groups of disabled consumers and audiences in different areas of the UK as part of its communication planning for the regional rollout of digital switchover. It is gathering regional information from consumers and audiences through its Regional Managers and via its Consumer Experts Group (CEG), which includes representation from the RNIB, Help the Aged, Age Concern, RNID, VLV, CAB, SENSE, NCC, OCP, ACRE, TAG, Wireless for the Bedridden, and the Ofcom Advisory Committee on Older and Disabled People. The CEG meets regularly to discuss the planning, implementation and management of digital switchover.

To ensure that everyone can switch easily to digital TV, the Government has announced that there will be a Help Scheme for people who need it most. The Help Scheme is focused on providing *practical assistance and support* for people aged 75 years and over, and people with significant disabilities. This Scheme is still being developed and is expected to be implemented in Whitehaven later in 2007.

The DCMS and DTI have consulted with a number of groups of disabled consumers and audiences on digital switchover and the Digital Switchover Help Scheme (see www.digitaltelevision.gov.uk/consultations/consultation_home.html). In 2005/06, DTI and DCMS ran a trial in Bolton which forms the basis of the Help Scheme (the full report from the Bolton Trial is available at www.digitaltelevision.gov.uk/technical_trials/ttrials_home.html).

Ofcom and Digital UK are also tracking and recording the perceptions and opinions of disabled people (those who describe themselves as disabled based on the Disability Discrimination Act – Amended 2005 definition and those in receipt of Disability Living Allowance or Attendance Allowance) regarding the digital switchover process, as part of its regular tracking survey. In the most recent report of the Ofcom/Digital UK tracker (Q3 2006), 366 of the 1,963 total respondents identified themselves as disabled.

Digital UK and the Ofcom Advisory Committee on Older and Disabled (ACOD) are commissioning qualitative research in early 2007. This includes focus groups and in-depth interviews with:

- Those with cognitive impairment (early stage dementia, learning difficulty)
- Blind and partially sighted
- Those with hearing impairments
- Those with mobility/dexterity impairment
- Carers of the above
- Informal family and friends
- Local voluntary supporter networks
- Social services.

Results will be published on completion and used to further inform this Scheme as appropriate.

Information on needs and barriers is also collected via a Usability Action Plan which has been established by the DTI. Manufacturers and consumers meet regularly to discuss digital switchover and specifically digital TV receiver equipment.

In addition, ‘mystery shopping’ surveys at commercial outlets include a quota of older and disabled store assessors who gauge the accessibility and appropriateness of service and advice given.

ACOD and a variety of other organisations contributed to a report entitled ‘Digital Switchover – An Audit of Viewers’ Priorities’, which was produced by Ofcom in July 2006. This research into the needs and potential barriers to accessing digital services helps to inform future planning around specific needs.

These information-gathering mechanisms and sources of information have resulted in the following:

Actions:

- Ministerial Group established to manage digital switchover programme.
- Digital UK in place to coordinate the digital switchover programme and to act as a single point of focus for digital switchover communications.
- Digital UK contact centre live agents are provided as an alternative to automated information through a main menu option and can action requests for generic information leaflets in alternative formats (Braille, large print and audio formats). Text service is provided for those with hearing impairments.
- A Digital Switchover Help Scheme is being developed to help those most in need.
- The industry is currently exploring 'easy-to-use' remote controls to make digital TV services more accessible.

4.3.4 Consulting Disabled BBC Staff

The BBC convened a group of disabled staff during 2006 to discuss the feasibility of launching a Disability Forum and to consult them about what the organisation needs to do now to become more disability aware and inclusive. Prior to this there has been a small internal mailing list for BBC disabled staff, but no formal representative mechanism to consult them about BBC plans which affect them. The Forum has been consulted on the reviewed Disability Equality Scheme and, although employment falls outside the scope of the Scheme, their views and formal response to it will help to inform broader BBC strategy review in this area. The Forum's remit goes beyond that of this Scheme, but nonetheless its work is important in relation to disability and the BBC's public functions. Information gathered has resulted in the following:

Actions:

- Invitation issued to all disabled BBC staff and interested colleagues to participate.
- Agreement reached to press ahead with plans for the Forum.
- The core group of the new Disability Forum met with the Director-General (DG), Mark Thompson, to brief him about the issues and their views on what the BBC should be doing.
- Progress on disability, including this Scheme, is now formally monitored by the BBC's Diversity Board, which consists of the DG and the Divisional Directors.

4.4 ASSESSMENT – Arrangements for assessing the impact of the activities of the BBC on disability equality and improving these when necessary

The methodology which the BBC will use to assess the impact of its public functions (or the policies and practices relating to the performance of those functions) with regard to disability equality is likely to vary according to the nature of the public function concerned. Assessment timetables relating to each function will also vary because many of the public functions to which this Scheme applies were introduced by the BBC's new Charter and Agreement, which only came fully into force on 1 January 2007. Nevertheless, preliminary assessments of activities which were scheduled or likely to take place in pursuance of these functions were made by the relevant parts of the BBC during the initial development of this Scheme, and the Action Plan for 2007 reflects this preliminary assessment.

With regard to existing public functions such as TV licensing, involvement and consultation with disabled stakeholders had been ongoing for a considerable period. This has been recognised as a valuable method for assessing the impact of TV licensing activities or planned activities (see section 4.3 and introduction to TVL Action Plan for more detail).

4.4.1 Equality Impact Assessments

To ensure a systematic and consistent approach to assessing existing or potential differential impact and to identifying specific needs requirements, the BBC will formalise equality impact assessment processes across all relevant public functions. The BBC will do this in line with recommended good practice and in order to meet the specific disability equality duties as they apply to the BBC's public functions, Equality Impact Assessments (EIAs) will help the BBC to:

- Identify any adverse impacts in carrying out the relevant public functions (or implementing policies and practices related to those functions).
- Identify unmet needs which may become apparent when carrying out the relevant public functions (or implementing policies and practices related to those functions).
- Ensure action is taken to address identified areas above.
- Inform future (disability) equality action planning and review of the Disability Equality Scheme.

4.4.2 Retrospective EIAs

The BBC will identify and prioritise a series of planned (disability) Equality Impact Assessments where relevant, and these will be conducted during 2007 (see individual Action Plans). The outcomes of these assessments and related consultation will be used to inform policy and planning processes, with specific actions being included in the relevant Action Plans during the three-year period.

4.4.3 Predictive EIAs

Any new policy or practice relating to a BBC public function (or any new function which is identified as public by the BBC) will be considered for an impact assessment as a matter of course, and the outcomes of those assessments conducted will be used to inform future review of the Scheme.

4.4.4 Consultation/Involvement

Where a full equality impact assessment is identified as relevant and proportionate to the duty to promote disability equality, the following consultation mechanisms will be considered:

- Consultation with and involvement of disabled colleagues from within the BBC and other broadcasting industry groups.
- Consultation and involvement with a range of organisations of and for disabled people in different locations across the UK.
- Questionnaires, surveys and other forms of information gathering published in appropriate media including print, broadcast and online, particularly those which are addressed to disabled stakeholder group audiences.
- Focus groups held in suitably diverse locations which meet appropriate accessibility requirements.

The above activities may also be carried out at appropriate intervals as part of other wider consultation activities and relevant information or evidence will be used to assess impact, inform action and influence the three-yearly review of this Scheme.

4.5 REVIEW – Details of how the BBC uses information gathered in particular in reviewing the effectiveness of its Action Plans and preparing subsequent Schemes

All of the information gathering, analysis and usage processes detailed above will be used as part of an ongoing review process.

Disability Equality Scheme outcomes will be evaluated on a regular basis in consultation with disabled people. The Scheme will be reviewed annually with a major review after three years.

In addition to reviewing disability equality performance with regard to the public functions covered by the Scheme, the BBC will always seek to move beyond mere compliance and consider the effectiveness of its policies and procedures through engaging disabled people on a variety of other matters.

5. Implementing the Disability Equality Scheme

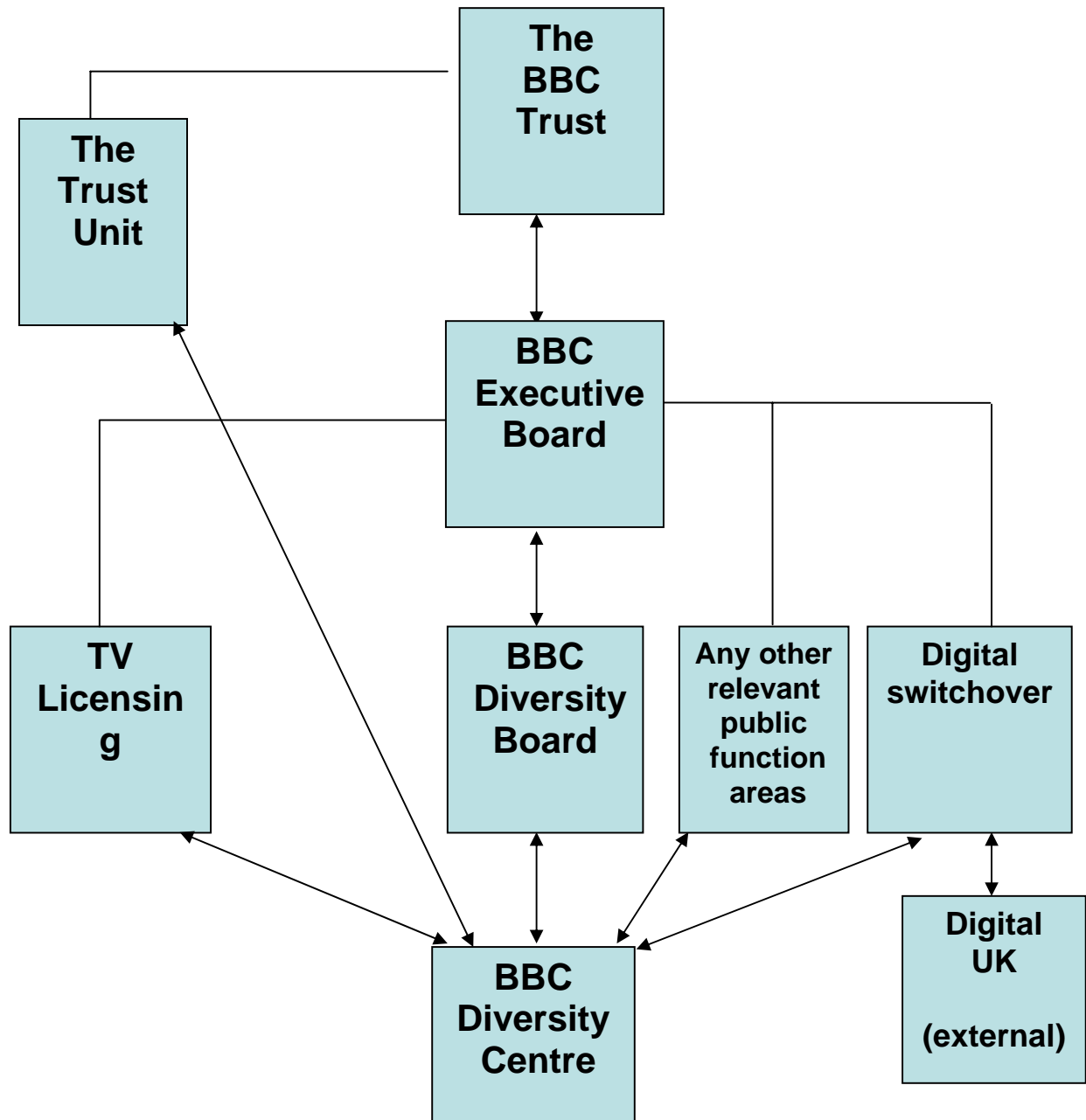
The implementation of the Disability Equality Scheme will be driven by the BBC Trust Unit insofar as it relates to the Trust, and otherwise by the BBC Executive Board and carried out at relevant Divisional level.

The Scheme runs for three years from 4 December 2006 to 3 December 2009, but will be subject to regular updates as well as formal annual reviews. The objectives contained within the Scheme should all be met by the end of this three-year period, though further objectives will be developed over time to ensure the BBC continues to implement disability equality relevant to its public functions and achieves the specific priority outcomes identified by disabled people (see also section 4.2 for more detail).

6. Monitoring and Evaluation

Progress on the Disability Equality Scheme Action Plan will be monitored and evaluated by the Trust Unit and management teams responsible for each relevant public function. Each management team reports to the Executive Board, which is accountable to the BBC Trust. In 2006 the BBC also set up a Diversity Board, led by the Director-General, Mark Thompson.

This body agrees and drives forward the BBC's wider diversity agenda. The structure chart below shows formal reporting lines (arrow lines also indicate advice and information flow).



Each Disability Equality Scheme Action Plan section has an in-built monitoring system in place (see pages 30–64), which will be used to measure progress and its effectiveness in achieving intended outcomes.

Throughout the three-year period, the BBC will continue to consult with and involve disabled people to monitor implementation and assess the impact of actions, in order to maintain a continual cycle of improvement.

This is the second draft of the BBC's first Disability Equality Scheme, which has been updated, amended and reshaped following:

- Dialogue with the Disability Rights Commission
- Analysis of feedback from the November 2006 core involvement activity

7. Feedback and Update

The BBC promotes its broad commitment to respecting, valuing and celebrating diversity, via the BBC Diversity website, bbc.co.uk/info/policies/diversity.shtml, where the Disability Equality Scheme will be published. It will also be published on the BBC Policies website, bbc.co.uk/info/policies, and on the following individual sites.

These are: bbc.co.uk/info/licencefee
 bbc.co.uk/bbctrust

Updates will be added at regular intervals. Alternative formats will be available on request and will be provided within a set maximum time limit.

In addition the Trust will report annually on the performance of the BBC Executive with regard to disability equality (see also Action Plan 2 [2.2]).

8. The BBC's Broader Approach to Promoting Disability Equality

NB: This section does not form part of the Disability Equality Scheme, which the BBC is required to publish under the Disability Discrimination Act (Public Authorities) (Statutory Duties) Regulations 2005, but should be read in conjunction with the Scheme as it provides additional information about the BBC's diversity commitments.

Although this Scheme is required to focus on the way in which the BBC will fulfil the Disability Equality Duty in relation to its public functions, the BBC undertakes a much broader approach than is needed to comply with the Disability Equality Duty as it relates to its public functions.

The BBC aims to promote disability equality generally through seeking to understand and meet the specific and diverse requirements of disabled people and by ensuring that they are fully involved in working together towards achieving fair and equal outcomes for themselves and their carers. This approach is based on the BBC's commitment to a broader diversity agenda and is underpinned by its core values: 'Audiences', 'Respect' and 'Working Together'. It is also driven – in part – by the specific duties relating to equal opportunities, which are placed on the BBC by the BBC Charter and Agreement (ref. Charter Article 44: (1) a & b and (2) b and Agreement Clause 83).

The following section sets out a number of additional steps which the BBC takes or has taken to promote the interests of disabled people. These are not required to be taken for the implementation of the Disability Equality Scheme, which relates only to the BBC's public functions, but are undertaken under other legal obligations, or completely voluntarily in accordance with good practice, to meet the needs of disabled people generally including, of course, disabled licence fee payers.

In October 2006, the BBC's Executive Board hosted a consultation event with other BBC Directors to understand the views and perceptions of the wider disabled community about the BBC's services. A number of national and local organisations working within the disability arena participated in the seminar, including the British Council of Disabled People, People First, TAG, MIND and Mencap. A BBC Governor attended this event. Information gathered at this event has resulted in the following.

Actions arising include:

- A review of the guidelines for visually impaired audiences.
- A commitment to work with disabled people inside and outside the BBC to raise awareness of the issues.
- A review of the processes in place to support disabled people working across the broadcasting industry.

The BBC is a member of the Broadcasting and Creative Industries Disability Network. As such, the BBC aims:

- 8.1 To increase the presence of disabled people on air and on screen
- 8.2 To increase the number of disabled people in all areas of the workforce
- 8.3 To increase access to services, on and off air
- 8.4 To ensure access to its buildings

8.1. The BBC aims to increase the presence of disabled people on air and on screen

What has been done already:

Television

The BBC introduced on-screen disability portrayal targets, most of which have been met.

- At least one regular disabled character in a returning drama series on BBC One (Paul Henshall in *Holby City*).
- Three factual and leisure shows on BBC One and BBC Two to feature at least one disabled contributor per series (*Beyond Boundaries*, BBC Two – 11 disabled contributors; Ade Adepitan (previously from *Xchange*, BBC One and CBBC) now contributes to *Sportsround*, BBC One, *Grandstand*, BBC One, and covered the new wheelchair doubles event at Wimbledon).
- Three key entertainment series on BBC One and BBC Two to feature a minimum of one disabled contestant in 50 (*Weakest Link* and *Jet Set* on BBC One, *Mastermind* on BBC Two).
- BBC Three to broadcast one drama or entertainment series with a regular disabled character – this has been more than met by *I'm with Stupid* which began on BBC Three on 10 September 2006 and features a number of disabled characters in addition to the lead role played by Paul Henshall.
- BBC Four to broadcast a minimum of two profiles of people of achievement per year, with an ambition to develop new on-screen talent in its factual output (for example profiles of Ray Charles and Muhammad Ali).

In addition to the above, there are many other examples of the BBC's increasing commitment to the inclusion and portrayal of disabled people in television output:

- *Ready Steady Cook* on BBC One
- *Something Special* on CBeebies
- *Soundproof*, *A Thing Called Love*, *Top Gear* and *Junior Mastermind* on BBC Two

- *House of Tiny Tearaways* on BBC Three.
- BBC News correspondent Frank Gardiner, who was left disabled as a result of being shot, has been featured in various reports
- *Desperados*, a children's drama about a disabled basketball team on CBBC
- Series two of *Beyond Boundaries* on BBC Two and series three currently in production
- *New Street Law* on BBC One
- Extensive coverage of the Paralympics in 2004

Radio

- *In Touch* and *You & Yours* on Radio 4, presented by Peter White, regularly feature items of interest and relevance to disabled people, likewise *Woman's Hour* and *Sound Advice*, presented by Gyles Brandreth.
- *The Archers* on Radio 4 has blind actor Ryan Kelly playing the regular character Jazzer.
- *Sound Barriers*, a Radio 4 drama featured deaf actor Steve Day.
- *The Lights*, a Radio 4 drama, featured wheelchair user actor Luke Hamill playing a wheelchair-user character.
- *My MS and Me*, another Radio 4 drama written by Jim Sweeney who has MS.
- *Peeling*, on Radio 3, written by visually impaired writer Kaite O'Reilly.
- *Watch the Spider*, also on Radio 3, written and performed by Andy McLay, a paraplegic, about his experiences.
- *Rean's Girls*, a Radio 4 afternoon play, written by Kaite O'Reilly who is visually impaired.
- *Daybreak*, a Radio 4 *Afternoon Play* written by disabled writer Tom Ray and a commission for an *Afternoon Play* written by Sue Townsend who is now blind.

Other Developments

- The BBC commissioned the first ever comprehensive, in-depth research into Learning Disabled Audiences (LDA), covering what they watched, how well they thought their needs were catered for and what specific programmes they would like to see on television in the future.
- A key finding of the LDA research was the importance of television soaps to Learning Disabled people, providing them with a window to the world, helping them to understand everything from relationships to what goes on in a pub. This led to the overwhelming desire to see themselves represented in these programmes above all others, particularly significant in the light of the current *EastEnders* storyline about Billy and Honey's baby having Down's syndrome.
- The BBC – in conjunction with Channel 4 and the Actors Centre – ran the Talent Fund for Disabled Actors, a training and development scheme for 25 disabled actors, selected

through nationwide open auditions. The aim was to increase the pool of disabled acting talent available to casting directors.

- BBC Children's has worked closely with the National Deaf Children's Society to produce a guide for programme makers on how to ensure that their programmes are inclusive of and accessible to deaf children.
- Post of Editorial Executive – Diversity, created during 2006. The postholder liaises with Corporate Diversity Centre and works closely with service controllers, commissioners, and in-house and independent production companies to improve on-screen portrayal and diversity. This includes providing advice to programme makers during the course of the development and production of programmes. New Disability Portrayal targets are currently being set.

What we will be doing going forward:

- The Production Handbook – a guide for programme makers on the Disability Discrimination Act – is currently being updated and will be relaunched.
- A recent audit of a range of BBC programmes has been carried out to assess provision for studio audiences and contributors under the DDA (part iii). Follow-up meetings with production teams will be held to ensure that the recommendations arising from the audit are carried out so that programmes are compliant with the DDA obligations which apply to the provision of services.
- A Portrayal Monitoring survey of BBC TV peak-time output has recently been commissioned; results will be available at the end of the year. The survey will be presented to the Vision Editorial Group and will be used to inform policy on inclusion and portrayal going forward.
- Increase the number of disabled people working in production for the BBC, either in house or through independent commissions.
- Continue to actively encourage the inclusion of disabled people in mainstream programming as well as targeted programming that works in the mainstream, such as *Beyond Boundaries* and *I'm With Stupid*.
- Begin the search for a Learning Disabled presenter for Children's on-air presentation.
- In radio we are investigating ways to ensure that programmes featuring items of interest to the disabled audience are flagged up to that audience. BBC Radio Factual is also considering introducing a regular Disability Newsletter.

8.2. The BBC aims to increase the number of disabled people in all areas of the workforce including production

The BBC continues to:

- Review recruitment practices so that job opportunities are accessible to disabled people (eg advertising, selection and assessment procedures).
- Make reasonable adjustments for employees who are or become disabled during employment.
- Provide a reasonable level of support to its disabled staff by including appropriate provisions into the outsourcing contract with Capita (now responsible for recruitment and reasonable adjustments).

In addition the BBC is committed to the following:

- Assessing the current level of disabled employees, and it has set a Disability Employment Target of 4% to be met by December 2007 after which it will be reviewed. We are currently the only broadcaster to have a publicly announced target.
- Consulting with and involving disabled staff in creating an inclusive and disability-aware workforce.
- Monitoring progress regularly at the Diversity Board: Mark Thompson chairs this board, and members are all the Divisional Directors.
- Continuing to monitor our disabled workforce.
- Continuing to run EXTEND (the BBC's work placement scheme specifically for disabled people), maintaining its more recent, successful focus on placements in production areas and reviewing the feasibility of increasing the number of Extendees taken on annually.
- The pan-BBC Access Unit has now been in operation for five years, offering a variety of services to disabled staff ranging from access assessments for new starters or newly disabled existing members of staff, arranging reasonable adjustments, and offering trained facilitators who can undertake some production roles, through to general support and advice. In addition the Access Unit is now also advising production teams working with disabled contributors on technical and production-related issues, for example *Desperados*.
- Continue to have a dedicated Assistive Technology manager.

8.3. The BBC aims to increase access to services, on and off air

Service provision commitments and current achievements:

- The BBC is committed to subtitling 100% of programming on BBC One, BBC Two, BBC News24, BBC Three, BBC Four, CBBC and CBeebies by 2008.
- The target for 2006/07 is for at least 95% of programmes on BBC One and BBC Two and 80% on the remaining channels to be subtitled.
- The BBC is committed to signing 5% of non-excluded programming on all of the above channels by 2008/09.
- The target for 2006/07 is at least 4% of each channel output to be signed.
- The BBC is committed to audio describing 10% of non-excluded programming on BBC One, BBC Two, BBC Three, BBC Four, CBBC and CBeebies by 2008/09.
- The target for 2006/07 is for at least 8% of these channels to be audio described.

The BBC is currently exceeding its targets on access services and is also on track to meet the targets set for 2008.

The BBC Information Directory is available free. In addition to the standard version there is also a Simple English version and a Large Print version.

Website Accessibility

The BBC has continued in its commitment to making its content as accessible to as wide an audience as possible. This has been reflected in the establishment of two accessibility teams in 2005 and 2006, the first with a brief to deliver accessible educational content for BBC iJam (the BBC's online educational service suspended by the BBC Trust on 20 March 2007 – see page 29) and the second focusing on the delivery of accessible future services starting with BBC iPlayer.

- The first prototypes of bbc.co.uk's future subtitling service were seen in 2005/06 in both the Click Online and iMP (Interactive Media Player) Trials in 2005/06. The learning from these prototypes has enabled bbc.co.uk to develop the necessary technologies to deliver subtitling for its future content. This will culminate in the launch of the first subtitles service for online AV content as part of BBC iPlayer in 2007.
- The BBC launched My Web, My Way (bbc.co.uk/accessibility) in 2005. The website aims to equip anyone using a computer with the tools and understanding to enable them to make the most of the internet, whatever their ability or disability, and regardless of the operating system (Windows, Mac or Linux) they use. The site provides advice and help to all those people who would benefit from making changes to their browser, operating system, or computer by giving advice on a wide range of specialist hardware such as alternative keyboards and mouse units, plus software such as voice recognition, screen reading and word prediction.

- CBeebies has worked closely with young children with motor disorders such as Cerebral Palsy to design a dozen fun and inclusive games for children 6 years old and under. The CBeebies team has proved that designing and adapting games to be controlled by switches rather than pointing devices is 'child's play'.

BBC iPlayer Accessibility

Note: BBC iPlayer has been given provisional approval by the BBC Trust and is now out to public consultation. It remains subject to final approval by the BBC Trust.

The BBC is committed to making its broadcast and online products and services as accessible as possible. The BBC iPlayer proposal for an online television catch-up service is no exception, bringing best practice in accessible website design and television access services together in one service.

The interface has been built with the consultation of the BBC New Media Access Team and various accessibility consultants. This ongoing consultation has fed into every stage of the BBC iPlayer design, which has enabled the development team to build a platform from which accessible interfaces with additional accessibility features such as the Display Settings options can be built.

This BBC iPlayer will also feature television-style access services (subtitles, audio description and British Sign Language). Each solution has been designed to maintain the high standards of the BBC's linear television services and will match the BBC's TV access services commitments by 2008.

With accessibility as one of its key objectives, the BBC iPlayer will set the standards for accessibility for all future BBC digital services.

8.4. To Ensure Access to its Buildings

BBC Workplace – Project Background

- In 2001 the BBC initiated a long-term process aimed at establishing improved access for disabled staff, visitors and artists across the BBC estate. The BBC initially carried out a programme of site audits across the entire estate and this produced a substantial list of potential improvements for consideration and action.
- Items identified ranged from minor works to more significant building improvements. BBC Workplace subsequently initiated a specific project to put in place a rolling programme of works which has so far led to a financial commitment in excess of £3million of improvements and upgrades across the estate.

Detailed Improvements

The works so far carried out typically cover:

- External building approach and car parking provision
- New and improved ramping
- Reception works
- Toilet works (both new and upgrades)
- New doors, some door automation, and improved vision panelling
- Better signage
- Provision of deaf alerters and hearing induction loops
- Lift car improvement works
- A new lift for BBC Belfast
- Lighting and colour contrast improvements for the visually impaired
- Renewal of and improvements to handrails
- Access improvements to studios and audience areas
- Better dressing-room provision
- Projects to assist some disabled staff in their workspace

New Buildings and Refurbishments

- In addition to the above, the BBC has also included access improvements in all of its major site developments, most notably at White City and Broadcasting House in London and at Pacific Quay in Glasgow.
- When the BBC carries out any significant upgrades or refurbishments to existing buildings, consideration is routinely given to the potential for additional access improvements.
- A full DDA audit is conducted prior to any proposed site moves and the audit report informs any decisions which the BBC makes regarding suitable access arrangements.

Ongoing Commitment

- All of the above outlines the BBC's commitment to making necessary and appropriate improvements. However, the process is not yet complete and there are still a number of access challenges to be overcome, particularly in some of the BBC's larger and older buildings.
- Nevertheless, the BBC's strategic vision is clear and remains fully committed to the process of improving accessibility across the BBC estate wherever this is possible.
- BBC jam, the BBC's broadband learning service for 5 to 16 year olds launched in 2006. The BBC Trust suspended the online education service on 20 March 2007 following complaints from the commercial sector about the parameters of its activities. The Trust

has requested BBC management to prepare fresh proposals for how the BBC should deliver the Charter obligations to promote formal education and learning, meeting the online needs of school-age children. Once complete, the Trust will subject BBC management's proposals to a full Public Value Test, including a market impact assessment by Ofcom. The Trust's decision follows extensive discussion with the Government and the European Commission about how to address allegations from some in the industry that BBC jam is damaging their interests. BBC jam was a combination of curriculum-based activities, video games, audio and animation, putting learners at its heart. The support needs of children with visual, hearing or motor impairments as well as those with learning difficulties were considered during the development of all BBC jam content, and the continued support for these children included an expert review of proposed content to ensure it best supports their needs. The BBC remains committed to ensuring that the needs of disabled children are represented in the new proposals.

9. Action Plan: Parts 1, 2 and 3 (sections i and ii)

ACTION PLAN I: TELEVISION LICENSING FUNCTION

Television Licensing (TVL) - Introduction

What is TVL?

“TV Licensing” (TVL) is a trading name used by companies contracted by the BBC to administer the collection of television licence fees and enforcement of the television licensing system. The majority of the administration of TV Licensing is contracted to Capita Business Services Ltd (which undertakes the majority of the TV licensing system), with the administration of cash-related payment schemes contracted to Revenue Management Services Ltd (RMS). PayPoint Collections Limited are contracted to provide over-the-counter services. The marketing and public relations activities are contracted to the AMV Consortium. The consortium is made up of the following four companies: Abbott Mead Vickers BBDO Ltd, Fishburn Hedges Boys Williams Limited, PHD Media Limited and Proximity London Ltd. The BBC is a public authority in respect of its television licensing functions and retains overall responsibility.

What help is already available to consumers who need it?

TV Licensing currently offers a number of ways to enable people with disabilities to access its services and information. These include the following:

- Textphone service
- Braille letters and publications
- Large print letters and publications
- Audio tapes of TV Licensing information
- Special email forms (ie some forms can be sent in electronic format enabling manipulation to make them accessible)
- Type Talk for deaf or speech-impaired people
- Account security numbers to enable carers/support workers to discuss customers' accounts, and
- Liaising with housebound customers to find an appropriate way for them to make payments, even if Direct Debit or other payment methods are not available to them

TV Licensing also has a small number of customers with specific needs, which are taken into account when conducting transactions or communicating with them.

The TV Licensing website (www.tvlicensing.co.uk) is compliant with the recognised WC3 access guidelines (currently compliant with levels, 1, 2 and parts of level 3).

Concessionary licences are also available for people who are registered blind (who receive a 50% discount). For those who live in applicable accommodation such as residential care, where one qualifying factor is that the individual is disabled, a £7.50 licence is available from 1 April 2007.

To offer peace of mind to all customers, but particularly those who are vulnerable, a password system is available to enable people to confirm the authenticity of TV Licensing visiting officers.

The BBC has ensured that there are provisions in the BBC's contracts with suppliers to ensure that they must comply with legal requirements and related policies, including the Disability Discrimination Act and this Disability Equality Scheme. This is monitored by the BBC TV Licensing Management Team.

How are the public consulted and/or informed about TVL?

The BBC and TVL engage in regular consultation with a number of key stakeholders to both gather and share information in relation to meeting the needs of disabled people. There is regular dialogue with the Royal National Institute for the Blind (RNIB), Age Concern, Help the Aged and Citizens Advice.

These relationships also relate to consulting on and seeking input on proposed changes in TV licensing processes (see section 4.3.1 for information on involvement and the mechanisms used to gather information related to disability and TVL).

TV Licensing's community relations campaign, which gained international recognition as winner of the 2004 International Public Relations Association Golden World award for community relations, is designed to target hard-to-reach community groups, such as those on low incomes and vulnerable people. By working with national and local stakeholders, the campaign targets groups including disabled people and their carers, who may struggle to pay for their licence for financial reasons or who are unaware of the legal requirement to buy a television licence. The objective of the campaign is to raise awareness of the need to have a television licence and the many easy ways to pay.

ACTION PLAN AIMS - That disabled people and their carers experience/receive appropriate and accessible Television Licensing information, advice and targeted support services

This Action Plan section shows how current TVL activities which are relevant to the Disability Equality Duty will be maintained and progress monitored. It also details a series of planned actions, which have been identified as necessary following an audit of current activity and through consultation and involvement with disabled people. A formal programme of equality impact assessments and continual involvement with disabled people will inform ongoing review (see above and also sections 4.3 / 4.4).

(Objectives not in priority order)

Objective	Action	Due Date	Lead	Evidence/Outcomes	Driver/Informed by	Status
I.To communicate with disabled people, wherever practicable, in a way that is accessible and appropriate to facilitate a clear understanding of television licensing obligations	i. An Equality Impact Assessment (EIA) will be conducted on a representative sample of TVL communications (mailings, information leaflets and publications), to examine how accessible and appropriate they are in style/content/format/ dissemination) and the EIA outcome will inform any further action necessary.	By end 2007	Marketing	i. TVL communications assessed and recommendations made to improve/amend where necessary.	DDA 2005 BBC Values: - Audiences - Respect BBC public functions: - Promotion of licensing requirements to the general public - Promotion of licensing requirements to stakeholders - Feedback following involvement with disabled stakeholders (ref. Churchill, Minty & Friend report) (CM&F)	
	ii. TVL will continue to make our communications available in Braille, large print, audio and electronic formats.	Ongoing	Marketing, Customer Relations	ii. Standard communications will be accessible to a range of disabled people.		
	iii. TVL will explore options for use of SMS/videophone in addition to existing textphone service.	By end 2007	Operations	iii. Options for introducing additional alternative modes of communications assessed.		

Objective	Action	Due Date	Lead	Evidence/Outcomes	Driver/Informed by	Status
	iv. TVL will review all television trails and publications to examine how best to represent disabled people.	By end 2007	Marketing	iv. A systematic review conducted and appropriate recommendations made.		
	v. TVL will explore options for introducing use of subtitling/BSL translation/audio description as appropriate in television trails.	By end 2007	Marketing	v. Options for introducing additional assisted methods of communication assessed.		
	vi. TVL will involve disabled people in an audit of website usability to assess accessibility and provide a positive customer experience for all. The use of pictures and easy-to-read will be explored.	By end 2007	Web Programme Manager	vi. A range of disabled people and carers involved in assessing usability of website.		
	vii. TVL will work with organisations such as Mencap so that information can be cascaded to members on TVL.	By end 2007 and then ongoing	Communications	vii. Disabled people within the wider community will have access to information via representative groups.		
	viii. Relationships will be continued/developed with a range of bodies, which represent, and/or consist of disabled people such as RADAR, the RNIB, the RNID and Mencap to develop a dialogue on licensing requirements.	Ongoing	Communications	viii. Partnership working and involvement with disabled people enhanced and new mutually beneficial relationships will be developed where possible.		

Objective	Action	Due Date	Lead	Evidence/Outcomes	Driver/Informed by	Status
2. To ensure that all BBC TVL staff and contractors fully understand their duty to promote disability equality and are active in implementing actions identified	i. Existing and new staff who deal with customers' queries/ complaints will receive disability equality training and will be expected to put learning into practice when dealing with customers.	By end 2008	Policy, Customer Relations	i. Those staff who have direct contact with disabled people are better equipped to understand additional needs and relevant staff will understand the use of specialist equipment.	DDA 2005 BBC Values: - Audiences - Respect - Working Together	
	ii. Visiting officers will receive disability equality training and their code of conduct will cover the BBC's expectations of their treatment of disabled people.	By end 2008	Field Operations	ii. Visiting officers are aware of the duty and will be better able to support and understand the diverse and complex needs of disabled people and carers.	BBC public function: - Customer relations - Feedback following involvement with disabled stakeholders (ref. CM&F report)	
	iii. The password system and visual identification will continue to be used so that people due to receive a visit are able to verify the authenticity of TV Licensing visiting officers.	Ongoing	Field Operations	iii. Disabled, older and vulnerable people feel safe and secure during home visits.		
	iv. Systems will be put into place to record and analyse information on complaints/comments which are related to disability needs/issues and ensure that all complaint monitoring is monitored for diversity (including disability).	By end 2008	Customer Relations	iv. Information and data collection relating to disability issues/needs are used by staff to improve services and better understand needs.		

Objective	Action	Due Date	Lead	Evidence/Outcomes	Driver/Informed by	Status
	<p>v. Systems will be put into place to formally record requests from disabled people and their carers.</p> <p>vi. Information from TVL's customer satisfaction survey will be analysed to determine whether disabled people's perception of TV Licensing's service is lower than that of non-disabled people.</p>	<p>By end 2009</p> <p>By mid 2008</p>	<p>Operations</p> <p>Customer Relations</p>	<p>v. Formal systems in place and data used to avoid unnecessary duplications, etc.</p> <p>vi. Information analysed and used where possible to improve services.</p>		
3. To continually review and wherever possible improve or develop service supports (including technology) to provide maximum access to support /advice services for all disabled people	<p>i. This Action Plan will be reviewed as necessary, in the light of outcomes from the analysis in action above.</p> <p>ii. An Equality Impact Assessment (EIA) will be conducted on the automated voice recognition systems to assess how well it meets the diverse needs of disabled people.</p> <p>iii. TV Licensing will examine possible options for disabled people to be able to speak to a customer services officer during business hours.</p>	<p>By end 2007</p> <p>By end 2007</p>	<p>Policy</p> <p>Operations</p> <p>Operations</p>	<p>i. Regular reviews of Action Plan carried out.</p> <p>ii. Assessment made and outcomes considered.</p> <p>iii. Options noted and assessed.</p>	<p>DDA 2005</p> <p>BBC Values: - Audiences - Respect - Working Together</p> <p>BBC public function: - Operations - Feedback following involvement with disabled stakeholders (ref. CM&F report)</p>	

Objective	Action	Due Date	Lead	Evidence/Outcomes	Driver/Informed by	Status
	<p>iv. Outcome of EIA will be used to inform further action.</p> <p>v. TVL will explore options for introducing a dedicated telephone payment line for disabled people.</p>	By mid 2008	<p>Policy</p> <p>Operations</p>	<p>iv. Regular reviews of Action Plan informed by Equality Impact Assessment outcomes.</p> <p>v. TVL automated voice recognition systems will meet the differing needs of disabled people wherever practicable.</p>		
4. To develop and maintain a strategic and systematic approach to integrating disability equality into all TVL activities	<p>i. All policies which are being developed/reviewed (BBC policies and the relevant contractors' policies) will be assessed for relevance to the Disability Equality Duty. EIAs will be carried out where it is considered relevant and proportionate to meeting the duty.</p> <p>ii. Existing BBC (and contractors') policies/functions which are relevant to the duty will be prioritised for a programme of equality impact assessments over three years.</p>	By end 2009	<p>Policy</p> <p>Policy</p>	<p>i. A systematic process will be in place, to ensure that future policies and related practices will be screened at the development stage to determine potential negative (or positive) impacts on disabled people.</p> <p>ii. A systematic process will be in place, for ensuring that existing policies and related practices are screened to determine whether they impact negatively (or positively) on disabled people.</p>	<p>DDA 2005</p> <p>BBC Values: - Audiences - Respect - Working Together</p> <p>BBC public function: - Operations: Policy Development</p>	

Objective	Action	Due Date	Lead	Evidence/Outcomes	Driver/Informed by	Status
	<p>iii. All senior managers will be briefed on the Disability Equality Duty to ensure that they pay due regard to the needs of disabled people when developing policy and practice and reviewing TVL' s overall performance.</p> <p>iv. A TVL Equalities Working Group will be set up to monitor compliance and review future Schemes and Action Plans.</p>	By end 2007	<p>Policy</p> <p>Policy</p>	<p>iii. A consistent level of knowledge and awareness among senior managers who are responsible for policy decisions which may impact on disabled people.</p> <p>iv. Greater clarity around who is responsible for implementing actions and a mechanism aimed at ensuring consistent monitoring and systematic reviews.</p>		
5. To maximise the potential for data and Information management systems to enhance and promote disability equality	<p>i. Any review and/or subsequent changes to information management (database) systems will be compliant with the Disability Equality Duty (<u>as well as the Data Protection Act</u>).</p> <p>ii. TVL will seek to utilise relevant information sources to inform further reviews of this action plan (<u>subject to necessary compliance with the Data Protection Act</u>).</p>	<p>Ongoing</p> <p>Ongoing</p>	<p>Data Management</p> <p>Policy</p>	<p>i. Data and systems will not impact adversely on disabled people and opportunities to use information to deliver improvements will be maximised.</p> <p>ii. Updates to Action Plan are informed by relevant information/data sets.</p>	<p>DDA 2005</p> <p>BBC Values: - Audiences - Respect - Working Together</p> <p>BBC public function: - Operations: Policy Development</p>	

Objective	Action	Due Date	Lead	Evidence/Outcomes	Driver/Informed by	Status
6. To develop and maintain strategic leadership and commitment to the broad implementation of the DES and the (TVL) action plan	i. A three-year timetable of Equality Impact Assessments (EIA) will be developed, to assess the impact of current payment methods/processes on disabled people.	By end 2009	Policy	i. Potential adverse impacts will be identified at an early stage and/or actions taken where practicable to mitigate.	DDA 2005 BBC Values: - Audiences - Respect	
	ii. An EIA will be conducted on new (or reviewed) payment policies as part of the development process and EIA outcomes will inform further action.	As necessary	Policy	ii. A systematic process will be in place, to ensure that future policies and related practices will be screened at development stage to determine potential negative (or positive) impacts on disabled people.	BBC public function: - Operations: Data base management	
7. To ensure that all payment methods/processes are accessible and appropriate for a range of needs	i. TVL will evaluate the usability of the online purchase facility on TVL website.	By end 2007	Web Programme Manager	i. Access to a wide range of payments options is available.	DDA 2005 BBC Values: - Audiences - Respect	
	ii. The Cash Easy Entry – payment will be extended to all.	From 1 April 2007	Operations	ii. Those who experience more barriers in receiving/ accessing information such as those with visual impairments and those using BSL are likely to benefit.	BBC public function: - Operations – Payment Processing	
	iii. TVL will liaise with representative groups/ organisations to examine how to provide more information on PayPoint accessibility.	By end 2007	Operations	iii. Disabled people involved in exploring options with BBC.	Feedback following involvement with disabled stakeholders (ref. CM&F report)	

Objective	Action	Due Date	Lead	Evidence/Outcomes	Driver/Informed by	Status
	iv. TVL will work with disabled people to explore possible alternative ways of contacting customer services (see I.1).	By end 2007	Operations	iv. TVL working with and involving disabled people where appropriate.		
8. To ensure a strategic approach to integrating disability equality into all TVL procurement activities	i. TVL will continue to impose a contractual obligation on contractors to comply with legal obligations including the Disability Equality Duty and this Scheme.	Ongoing	Operations	i. Clear and explicit specifications (and contracts) regarding the duty to promote disability equality, which will allow for consistent, robust monitoring of contractors by the BBC.	DDA 2005 BBC Values: - Audiences - Respect - Working together	
	ii. TVL will aim to ensure that clear and explicit reference to disability equality issues/ implications is contained within specifications (where permitted under the Public Contracts Regulations 2006).	From April 2007 onwards	Operations	ii. Potential contractors will be clear about the BBC's duties and general approach to disability and will be expected to take these into account when delivering services.		
	iii. At Invitation to Tender (ITT) stage / preferred bidder stages all bidders will be briefed on the Disability Equality Duty and the BBC's expectations related to the Disability Equality Duty.	From April 2007 onwards	Operations	iii. The BBC will be able to screen bidders at an early stage, to ensure a positive approach to disability in planned service delivery.		

Objective	Action	Due Date	Lead	Evidence/Outcomes	Driver/Informed by	Status
	<p>iv. TVL will clarify to bidders what impact the duty is likely to have on how they intend to deliver their services – if their bid is successful.</p> <p>v. TVL will continue to require all bidders to complete a corporate social responsibility questionnaire which includes matters relevant to the Disability Equality Duty.</p> <p>vi. TVL will monitor contractors' compliance with the BBC's imposed contractual obligation in relation to the disability (and other) equality duties and this Scheme as part of TVL's standard business practice.</p>	<p>As necessary</p> <p>Ongoing</p> <p>From now on</p>	<p>Operations</p> <p>Operations</p> <p>Policy</p>	<p>iv. Raised level of awareness amongst potential bidders.</p> <p>v. Increased understanding of how to mitigate potential adverse impacts for disabled.</p> <p>vi . The BBC will be able to identify where a contractor may not be complying with duties or expected standards and take action to address.</p>		

ACTION PLAN 2: THE BBC TRUST IN RELATION TO CERTAIN FUNCTIONS UNDER THE BBC CHARTER AND AGREEMENT (Relating to Involvement)

The BBC Trust – Introduction

What is the BBC Trust?

The new BBC Trust is supported by a BBC Trust Unit which in January 2007 took over from the Governance Unit, which had supported the BBC Governors previously.

How are the public consulted and/or informed about The Trust's activities/ role?

The Government previously carried out extensive public consultation connected with the transition to The Trust. The BBC's Governance Unit also ensured that disabled licence fee payers were given the opportunity to meet with Governors and tell them first hand what they thought of the BBC's programmes and services (see also section 4.3 for information on involvement and a range of mechanisms already in place which aim to gather information related to disability and the Trust).

ACTION PLAN AIMS: That disabled people are afforded fair and equal access and maximum opportunity to participate in all relevant BBC public functions and related activities, through their increased involvement and representation in the new BBC Trust

This Action Plan details a series of planned actions which have been identified as necessary following an audit of current activity in relevant areas and through consultation and involvement with disabled people. Equality impact assessments, where appropriate, and the continual involvement with disabled people will inform ongoing review (see above and also sections 4.3 / 4.4). Because of the significant consultation exercise which is to be carried out by the Trust Unit in April 2007, the Trust will monitor the actions identified below in February 2008.

Each action is cross-referenced with the relevant Charter Article or Agreement Clause, where relevant to the Disability Equality Duty (see page 4 and Annex for more detail).

Objectives	Actions	Due Date	Lead	Evidence/Outcomes	Driver/ Informed by	Status
<p>I. To ensure all of the Trust's communications (internal or external) including involvement activities, are fully accessible and meet the specific needs of all groups.</p>	<p>i. The Trust's 'Audience Engagement' consultation will encourage and facilitate the full and meaningful involvement of disabled people and carers, in order to learn how disabled people and carers want to be involved in the Trust consultation/involvement activities, and how to facilitate this (ref. Charter Article 26).</p> <p>ii. Specific recommendations arising out of 'Audience Engagement' consultation will be agreed by the Trust to ensure appropriate support is given to continual involvement of disabled people in the Trust's decision making (ref. Charter Article 26).</p> <p>iii. The Trust will provide Braille and audio versions of all publicly available documents on request (within a published maximum time limit) and will seek to meet other specific communications needs by providing accessible online documents and alternative</p>	<p>May– August 2007</p> <p>Sep 2007</p> <p>Already operational</p>	<p>The Trust Unit (Audiences team)</p> <p>The Trust Unit (Audiences team)</p> <p>The Trust Unit</p>	<p>i. A fair, equal and transparent consultation which produces a list of recommendations about how the Trust should involve and facilitate disabled people and carers.</p> <p>ii. Audience Engagement Protocol published and any other associated documents that include recommendations arising out of the consultation exercise with disabled people and carers.</p> <p>iii. When requested, the prompt provision of audio and Braille documents so that disabled persons and carers are facilitated to participate or engage in the Trust's activities.</p>	<p>DDA 2005</p> <p>BBC Values: - Audiences - Respect - Working Together</p> <p>Recommendations following involvement with disabled stakeholders (ref. Churchill, Minty & Friend report) (CM&F)</p>	

Objectives	Actions	Due Date	Lead	Evidence/Outcomes	Driver/ Informed by	Status
	<p>formats such as easy-read or pictorial wherever possible. (Applicable to all public functions – see Annex.)</p> <p>iv. The Trust will seek to ascertain specific needs in advance of all meetings (internal and external) and appropriate adjustments will be made to facilitate the involvement of all disabled people and carers, whether members of the Trust, BBC employees or members of the public/audience. (Applicable to all public functions – see Annex.)</p> <p>v. All other communications (which are made as part of the discharge of a public function) will also be provided on request in Braille and audio (within a published maximum time limit). The Trust will also seek to meet other specific communications needs by providing accessible online documents and alternative formats such as easy-read or pictorial versions, wherever possible. (Applicable to all public functions – see Annex.)</p>	<p>Already operational</p> <p>Already operational</p>	<p>The Trust Unit (Audiences team)</p> <p>The Trust Unit</p>	<p>iv. The Trust’s meetings will be held in venues which are accessible to disabled persons. Public meetings will be supported by a sign language interpreter and if requested a palantypist and/or any other specialist services identified prior to the date.</p> <p>v. Evidence of prompt provision of audio and Braille documents (when requested) to facilitate disabled persons’ and carers’ participation or engagement in the Trust’s activities.</p>		

Objectives	Actions	Due Date	Lead	Evidence/Outcomes	Driver/ Informed by	Status
2. To monitor and assess the BBC's strategic approach to disability equality in order to review and continually improve outcomes for disabled people	i. The Trust will put into place mechanisms to assess the performance of the Executive Board in promoting disability equality in carrying out the public functions of the BBC and will hold it to account (ref. Charter Article 24).	July 2007 (expected publication of the Annual report)	The Trust Unit (Audiences team)	i. BBC Executive Board's performance reported by the Trust in an annual report.	DDA 2005 BBC Values: - Audiences - Respect	
3. To ensure that all disabled people have equal and fair access to the Trust's complaints processes	i. The Trust will set and publish a framework for dealing with complaints. This will comply with access actions set out in 1.i above (ref: Charter Article 24/25 and Agreement Clause 89-90). ii. When handling appeals, the Trust will ensure that the Complaints Manager identifies and provides the necessary advice and support required for those persons who are unable to submit their appeal in writing (ref. Charter Article 24).	Autumn 2007 Already operational	The Trust Unit (Editorial Standards team) The Trust Unit (Editorial Standards team)	i. Complaints framework published which has fair involvement of disabled people and carers. ii. Disabled persons are able to submit a complaint in a timely way and with the necessary support, so that they are not deterred or prevented from participating in the BBC complaints process.	DDA 2005 BBC Values: - Audiences - Respect - Working Together	

Objectives	Actions	Due Date	Lead	Evidence/Outcomes	Driver/ Informed by	Status
	<p>iii. In relation to hearings, information on specific needs will be sought in advance and the appropriate adjustments will be made, to facilitate the full participation of any disabled person (ref: Charter Article 24)</p> <p>iv. In setting and publishing a framework/s for dealing with complaints, the Trust will identify alternative accessible methods for making a complaint and ensure these are publicised (ref. Charter Article 24 and 25).</p>	<p>Already operational</p> <p>Autumn 2007</p>	<p>The Trust Unit (Editorial Standards team)</p> <p>The Trust Unit (Editorial Standards team)</p>	<p>iii. When requested or identified, additional adjustments will be made to facilitate the participation of disabled people and carers.</p> <p>iv. When consulting on the complaints framework the Trust will ensure the involvement of disabled people and carers so that alternative accessible methods for making a complaint are identified.</p>		
<p>4. To monitor and assess equality of access, information and service provision with regard to TV L and DSO functions (see also TVL & DSO action plans for detail)</p>	<p>i. The Trust will monitor the steps which the BBC has taken to fulfil the Disability Equality Duty in respect of its TV Licensing public functions in the BBC's Annual Report & Accounts (ref. Charter Article 24).</p> <p>ii. In reporting to the Secretary of State, the Trust will comment on the compliance by the BBC with its disability equality obligations in relation to digital switchover (ref. Agreement Clause 4 I).</p>	<p>Publication of the Annual Report – expected July 2007</p> <p>Publication of the Annual Report – expected July 2007</p>	<p>The Trust Unit (Finance, Economics and Strategy team)</p> <p>The Trust Unit (Finance, Economics and Strategy team)</p>	<p>i. Effective mechanisms for monitoring activities are in place (as part of this Action Plan).</p> <p>ii. Annual report to the Secretary of State published and including relevant disability related information.</p>	<p>DDA 2005</p> <p>BBC Charter & Agreement</p> <p>BBC Values: - Audiences - Respect</p>	

Objectives	Actions	Due Date	Lead	Evidence/Outcomes	Driver/ Informed by	Status
<p>6. To ensure specific public reports and information is fully accessible and appropriate (in style, format and content) for all disabled people</p>	<p>i. The Trust will ensure that Braille and audio versions of the Annual Report & Accounts will be provided on request (within a maximum set time limit) and will explore what other formats might be necessary to meet other specific needs.</p> <p>ii. The Trust's commentary on the Annual Report & Accounts will include the Trust's statement on how it views the BBC is meeting the needs of disabled people (ref. Charter Article 45).</p> <p>iii. The Trust will ensure compliance with the BBC's commitments for access services in relation to party political broadcasts and referendum campaigns (ref. Agreement clause 48).</p>	<p>Already operational</p> <p>July 2007</p> <p>Already operational</p>	<p>The Trust Unit (Finance, Economics and Strategy team)</p> <p>The Trust Unit (Audiences team)</p> <p>The Trust Unit (Editorial Standards team)</p>	<p>i. Evidence of prompt provision of audio and Braille documents (when requested) to facilitate disabled persons' and carers' participation or engagement in the Trust's activities.</p> <p>ii. Annual reports publicly available from the Trust, which show the performance of the BBC Executive Board in fulfilling its Disability Equality Duty.</p> <p>iii. The Trust will approve a policy by the Executive Board on party political and referendum campaign broadcasts. The Trust will expect the Executive Board to review the policy from time to time, and not less than every five years.</p>	<p>DDA 2005</p> <p>BBC Values: - Audiences - Respect - Working Together</p>	

Objectives	Actions	Due Date	Lead	Evidence/Outcomes	Driver/ Informed by	Status
	iv. Through revising the relevant code of practice for the Executive Board, the Trust will ensure that independent producers are required to comply with applicable requirements under the DDA when supplying output for the BBC (ref. Agreement clause 61).	Already operational	The Trust Unit (Performance team)	iv. The BBC Executive Board's performance reported by the Trust in an annual report.		

NB:

CHARTER (Articles 22–23): No specific actions, but will be addressed through actions against the more detailed public functions of the Trust

AGREEMENT (Clause 18): This provision has been assessed by the BBC and found to be a public function not relevant to the general duty

ACTION PLAN 3: THE BBC IN RELATION TO CERTAIN FUNCTIONS UNDER THE BBC AGREEMENT

SECTION i: The BBC's obligations in relation to Digital Switchover. (Agreement – Clauses 34–41)

Digital Switchover – Introduction

What is digital switchover?

Starting in 2008 and ending in 2012, TV services in the UK will go completely digital. This switchover process will take place region by region. The UK's analogue television broadcast signal will be switched off and digital terrestrial TV coverage will increase to 98.5% across the UK.

Digital switchover involves major technological changes across the UK television broadcast infrastructure, which needs to be carried out not only by the BBC but also by all other terrestrial broadcasters including ITV, Channel 4, Channel Five, S4C, SDN and National Grid Wireless. Digital switchover is also about ensuring that people have adapted or upgraded their televisions and recording equipment to receive digital TV.

What help will be available to consumers who need it?

The Government has announced that there will be a Digital Switchover Help Scheme (DSHS) to assist the most vulnerable beneficiaries to make the switchover to digital TV. On confirming the timetable for digital switchover in the UK, the Secretary of State for Culture, Media and Sport made it clear that the transition to digital-only broadcasting needed to be an inclusive process and gave a commitment that people who would find the change to digital TV most challenging would be supported through a comprehensive help scheme. The DCMS is expected to finalise arrangements for the DSHS in early 2007. For more information on the DSHS please visit www.digitaltelevision.gov.uk/sscheme/sscheme_home.html.

In September 2005 the Government announced a Help Scheme to make sure that no one will be left behind in the switch to digital TV. The Help Scheme is focused on providing practical assistance and support to those individuals who need it most. It is aimed at people aged over 75 and over, people with significant disabilities and people who are registered blind or registered partially sighted. People with significant disabilities are those who receive Attendance Allowance or Disability Living Allowance.

The assistance and support provided by the Scheme will include:

- providing equipment to convert one TV set
- help with installation
- follow-up support

This provision will be free to the poorest eligible households, ie those on Income Support, Job Seeker's Allowance or Pension Credit. Other eligible households will need to pay a one-off £40 fee.

How are the public being consulted on/ informed about digital switchover?

Digital UK is the independent, not-for-profit organisation leading the process of digital TV switchover in the UK. Digital UK provides impartial information on what people need to do to prepare for the move to digital, and when they need to do it.

Digital UK was set up at the request of the Government to manage all communications with the public regarding digital switchover. Digital UK works closely with the Department for Culture, Media and Sport (DCMS) and the Department of Trade and Industry (DTI), as well as the regulator Ofcom, to prepare the UK for the changes.

Digital UK is owned by the UK's public service broadcasters (BBC, ITV, Channel 4, Five, S4C and Teletext), and transmission companies SDN and National Grid Wireless. Digital UK works with digital TV platform operators, equipment manufacturers, installers, retailers, rental companies and consumer groups to coordinate the technical rollout of digital television across the UK. (See also section 4.3.3 for information on involvement and a range of mechanisms already in place which aim to gathering information related to disability and digital switchover.)

NB: Due to the collaborative nature of the digital switchover project, involving Digital UK, the DCMS, DTI and Ofcom, the BBC does not have control over all of the actions in its Action Plan. Where this is the case, the BBC will meet its commitment by working closely with the relevant organisation and will use its best endeavours to ensure the actions are achieved.

ACTION PLAN AIMS – That disabled (and older) people experience or receive appropriate and accessible digital switchover information, advice and targeted support throughout the entire transition period

This Action Plan (section i) shows in detail how current digital switchover activities which are relevant to the Disability Equality Duty will be maintained and progress monitored. It also details a series of planned actions which have been identified through consultation and involvement with disabled people. Equality Impact Assessments, where appropriate, and continual involvement with disabled people will inform ongoing review (see also above and also sections 4.3. / 4.4).

In particular, the action plan sets out how the BBC and Digital UK will work together (see also page 15) and will specify:

- The ways in which disabled people have been involved in development of digital switchover (DSO) communications and activities.
- Methods for assessing the impact of DSO policies and practices or proposed policies and practices on disabled people.
- The steps which Digital UK is taking towards the fulfilment of the Disability Equality Duty in respect of equal access to information and support through the DSO programme.
- Arrangements for gathering information on the effect of DSO policies and practices on disabled people and the arrangements for information usage to assist the BBC in complying with the Disability Equality Duty.
- How Digital UK and the BBC will work together to ensure that the BBC has sufficient information to comply with the Disability Equality Duty.
- How policies which aim to ensure that disabled organisations and individuals are actively engaged with DSO have been shared with the BBC and will be forwarded and shared as they are developed.

Note: this Action Plan reflects future activity only and does not reference where activities are well established and ongoing.

Objective	Action	Due Date	Lead	Evidence/ Outcomes	Driver/ Informed by:	Status
I. To assist the 'most vulnerable beneficiaries' (older and disabled people) to make the switchover to digital TV	i. The BBC to continue to work with DCMS, DTI and Digital UK on the Digital Switchover Help Scheme. This Action Plan will be reviewed when the details of the Scheme and how it will be governed have been agreed.	2007 onwards	BBC Chief Operating Officer and BBC Director of Marketing, Communications & Audiences working alongside Digital UK and other industry partners	i. Older and disabled people entitled to assistance benefit from the DSHS. Measured by Intelligent Client and contractual Service Level Agreements.	DDA 2005 Government White Paper BBC Values including Audiences and Respect Recommendations following involvement with disabled stakeholders (ref. CM&F report)	
	ii. BBC Digital UK board members monitor and influence Digital UK activities and ensure the needs of disabled, carers (and older people) are being addressed.	May 2007 onwards	As above	ii. Digital UK information includes options for receiving digital TV.	As above	
	iii. BBC representatives will attend Digital UK's quarterly Finance & Marketing Committee (F&MC) meetings to drive forward a strategy aimed at ensuring a consistent and systematic approach to assisting disabled people	May 2007 onwards	As above	iii. F&CC operates as formal arena to ensure a consistent approach to assisting disabled people.	As above	
	iv. The BBC to advise on minimum standards for ensuring accessibility and inclusiveness for most vulnerable groups	June 2007 onwards	As above	iv. Policy on agreed minimum standards in place BBC to forward accessibility communications policy.	As above	

Objective	Action	Due Date	Lead	Evidence/ Outcomes	Driver/ Informed by:	Status
	v. BBC and Digital UK develop a strategy and policies aimed at minimising risks to vulnerable people by use of a digital tick certification mark.	Complete	As above	v. Digital 'tick' certification mark to indicate goods which will work post DSO and related services actively promoted to consumers in place. Further policies being developed.	As above	
	vi. The BBC will attend DTI Usability Group meetings and use these to encourage the digital television supply chain to give full technological consideration to providing a solution for those dependent on environmental controls and to ensure relevant information is promoted appropriately to disabled audiences.	2007 onwards	As above	vi. BBC regularly attending Usability Group meetings and contributing advice regarding needs of disabled users.	As above	
	vii. Ongoing engagement of Digital UK Regional Managers with disability relevant organisations including consumer groups, charities (including disabled groups), volunteer groups and social services departments within local authorities.	Region-specific start dates according to regional rollout of DSO: 2007 onwards	As above	vii. Outcomes included in Digital UK's current reporting procedures.	As above	

Objective	Action	Due Date	Lead	Evidence/ Outcomes	Driver/ Informed by:	Status
2. To ensure that the transition to digital-only broadcasting is a fully inclusive process	i. Through attending its quarterly F&MC meetings, the BBC will monitor Digital UK's general and specific marketing for inclusiveness and accessibility and request improvements as and when necessary, eg following evaluation of Project Whitehaven communications.	May 2007 onwards	As above	i. Digital UK consistently produces inclusive and accessible communications on switchover (copies supplied to BBC). Ofcom/Digital UK Tracker results. lessons learned from Project Whitehaven.	As above	
3. To ensure that all digital switchover related information and modes of communication are appropriate for target audience and are fully accessible	i. Digital UK actively engages with relevant disabled organisations and disabled people through its ongoing work with a number of groups such as: Consumer Expert Group, RNIB, RNID, TAG, Wireless for the Bedridden, SENSE, Age Concern, Help the Aged, Ofcom Consumer Panel, Ofcom Advisory Committee on Older and Disabled People. This work may involve research from time to time and any findings will be used to inform further review of this Action Plan.	2007 onwards	As above	i. Ofcom/Digital UK Tracker results, and Churchill Minty & Friend report feedback	As above	

Objective	Action	Due Date	Lead	Evidence/ Outcomes	Driver/ Informed by:	Status
	ii. At F&MC quarterly meetings, the BBC and Digital UK will monitor the spectrum of digital switchover communications to check for appropriate style and format plus relevant content.	May 2007 onwards	As above	ii. People can contact Digital UK in various ways, for example by telephone, textphone, white mail, email, through local roadshows and digital clinics. Information on specialist resources for disabled people is provided.	As above	
	iii. The BBC will work with Digital UK to assure basic minimum standards of accessible communications which are appropriate to different media platforms, as some standard routes may present barriers to some groups for example sub titling and audio description	June 2007 onwards	As above	iii. Policy on standards in place	As above	
	iv. The BBC will work with Digital UK to provide, wherever practicable, specific forms of communication which are relevant and appropriate for relevant audiences, for example those with sensory impairments or learning difficulties.	June 2007 onwards	As above	iv. Identified target groups receiving information in specific formats, where practicable.	As above	

Objective	Action	Due Date	Lead	Evidence/ Outcomes	Driver/ Informed by:	Status
	v. The BBC will attend DTI Usability Group and encourage the development of a platform neutral information resource, which signposts people to specialist equipment /functions such as compatibility with audio description, subtitling.	2007 onwards	As above	v. Specialist information is available in Digital UK communications to advise on access functions and services e.g. audio description.. Digital UK provides signposts to relevant information on website such as 'Ricability' consumer reports.	As above	
4. To involve disabled people in the planning and rollout of digital switchover	i. Consumer Expert Group (CEG) meetings occur regularly to advise DCMS and Digital UK on the DSO programme.	May 2007 onwards	As above	i. CEG meetings and Digital UK CEG feedback.	As above	
	ii. Regular meetings of the Usability Action Plan group will take place led by DTI.	May 2007 onwards	As above	ii. DTI Usability Action Plan Group Meetings.	As above	
	iii. The BBC will ensure findings of the Churchill, Minty & Friend consultation report are shared with Digital UK.	Complete	As above	iii. Digital UK have Churchill Minty & Friend consultation report.	As above	

Objective	Action	Due Date	Lead	Evidence/ Outcomes	Driver/ Informed by:	Status
	iv. Digital UK / Ofcom monthly research into disabled people's attitudes, awareness and understanding of digital switchover will be used to assess the impact of the Digital UK communications strategy.	May 2007 onwards	As above	iv. Ofcom/Digital UK Tracker results. Digital UK communications evolve during the digital switchover programme.	As above	
	v. Digital UK regional managers to meet with local charity and volunteer organisations and local authorities.	From May 2007 onwards	As above	v. Digital UK regional manager meetings with local charity and volunteer organisations and local authorities taking place.	As above	
5. To gather and use information effectively in order to monitor and assess the impact of current and planned DSO policies and practices with	i. Digital UK will use this research to review which groups may need more targeted digital switchover communications.	2007 onwards	As above	i. Ofcom and Digital UK publish consultation reports on their websites.	As above	
	ii. Digital UK and Ofcom Advisory Committee on Older and Disabled People (ACOD) will carry out digital switchover qualitative research and focus groups with disabled people.	August 2007	As above	iii. Publication of the Ofcom/Digital UK Tracker reports are published quarterly and available on both organisations websites.	As above	

Objective	Action	Due Date	Lead	Evidence/ Outcomes	Driver/ Informed by:	Status
regard to disability equality	iii. Analyse and evaluate findings from Project Whitehaven to capture learning and report back to Diversity Board, BBC Executive Board and BBC Trust.	Analysis of project Whithaven findings by end Q2 2008	As above	iii. Recommendations from Project Whitehaven demonstrably incorporated into future digital switchover communications.	As above	
	iv. The BBC will work with Digital UK to identify all key DSO policies/functions/ project elements and prioritise for (disability) Equality Impact Assessments.	By Sep 2007	As above	iv. Prioritised timetable in place for Equality Impact Assessments.	As above	
	v. The BBC will work with Digital UK to conduct (disability) Equality Impact Assessments according to prioritised timetable.	From Sep 2007 and as timetabled	As above	v. Records of Equality Impact Assessments available.	As above	
6. To ensure effective internal monitoring and DES outcomes	i. The BBC will monitor and update this Action Plan and review as necessary, for example following, Project Whitehaven evaluation	May 2007 onwards	As above	i. Action Plan is regularly reviewed and updated	As above	

Objective	Action	Due Date	Lead	Evidence/ Outcomes	Driver/ Informed by:	Status
evaluation	ii. The BBC and Digital UK DSO team will conduct Action Plan annual reviews and the three-yearly formal Scheme review will go to the BBC Executive Board and the BBC Trust for approval.	April 2008 onwards	As above	ii. Formal reviews approved by responsible team and reports available to the BBC and Digital UK.	As above	
	iii. The BBC will set up internal mechanisms for progress monitoring and reporting to the Diversity Board, BBC Executive Board and BBC Trust.	May 2007 onwards	As above	iii. Clear roles and responsibilities are documented for internal team.	As above	

NB: Agreement Clauses 40 & 41: These provisions have been assessed by the BBC and have been found to be public functions not relevant to the general duty .

ACTION PLAN 3: THE BBC IN RELATION TO CERTAIN FUNCTIONS UNDER THE BBC AGREEMENT

SECTION ii: Other functions of the BBC in relation to certain functions under the BBC Agreement other BBC (Agreement Clauses 12, 59-60 74, 81)

What is the BBC Agreement?

In addition to the Royal Charter, the BBC has entered into a Framework Agreement with the Secretary of State for Culture, Media and Sport. This Agreement deals with a number of important matters (see page 4 and Annex for more detail).

How are the public consulted and/or informed about the BBC Agreement?

During recent extensive public consultation connected with the transition from the BBC Governors to the BBC Trust arrangement, disabled licence fee payers were given the opportunity to meet with Governors and tell them first hand what they thought about the proposed Charter and Agreement (see also 4.3/ 4.4).

ACTION PLAN AIMS: That disabled people/audiences are afforded fair and equal access and maximum opportunity to participate in all relevant BBC public functions and related activities, through ensuring full access to all public information and involvement activities.

This Action Plan (section ii) details a series of planned actions which have been identified as necessary following an audit of current activity in relevant areas and through consultation and involvement with disabled people. Equality Impact Assessments, where appropriate, and continual involvement with disabled people will inform ongoing review (see above and also 4.3). Each action is cross-referenced with the relevant Agreement Clause, where relevant to the Disability Equality Duty.

Objective	Action	Due Date	Lead	Evidence/Outcomes	Driver/ Informed by	Status
<p>I. To anticipate and wherever practicable meet the diverse needs of disabled people who access or seek to access UK public services</p>	<p>i. The BBC will continue to extend and monitor the provision of access services in order to meet its targets for Television:</p> <ul style="list-style-type: none"> - 100% subtitling April 2008 - 10% audio November 2007 - 5% signing November 2007 	Ongoing	Wilf White	i. BBC Access service target met (TV).	DDA 2005	
	<p>ii. The BBC will continue to develop and publish Online services that meet the accessibility requirements of our users.</p>	Ongoing	Tony Ageh	ii. Digital accessibility is a fundamental objective of the BBC's digital service strategy. All new access services will meet the accessibility requirements of its users through compliance with the BBC's Digital Accessibility Standards and Guidelines and involvement of users with disability when developing and testing its innovative services.	<p>BBC Values:</p> <ul style="list-style-type: none"> - Audiences - Respect - Working Together <p>Recommendations following involvement with disabled stakeholders (ref. Churchill, Minty & Friend report)</p>	
	<p>iii. The BBC will continue to monitor the provision of access services for Radio including:</p> <ul style="list-style-type: none"> - availability of majority of programmes online for seven days after transmission via Radio Player 	Ongoing	Head of Business Unit, Audio & Music	iii. BBC Access services commitments met via Radio Player facility.		

Objective	Action	Due Date	Lead	Evidence/Outcomes	Driver/ Informed by	Status
	<p>- provision of transcripts, where proportionate and reasonable, eg high demand anticipated for popular transmissions and/or specific requests – where practicable</p> <p>iii. The BBC will consult groups which are representative of those with sensory impairments, regarding the most appropriate range of access services and in evaluating their effectiveness (ref. Agreement Clause 12).</p>	Ongoing	Wilf White	iii. Documentary evidence of consultation/engagement with a range of relevant groups.		

Objective	Action	Due Date	Lead	Evidence/Outcomes	Driver/ Informed by	Status
2. To anticipate and meet communication needs of those with sensory impairments in order to ensure their access to UK services and to related information/consultation activities (as required by Ofcom's code)	i. The BBC will ensure compliance with the Ofcom code (relating to provision for the deaf and visually impaired) as it is set out in the BBC Charter (ref. Agreement Clauses 59–60).	Ongoing	Wilf White	i. Compliance monitoring report available.	DDA 2005 BBC Values: - Audiences - Respect - Working Together	
	ii. The BBC will ensure that any public documents <u>relating to the Ofcom code and the BBC's implementation of that code</u> will be made available in accessible Braille and audio tape on request (within a maximum time limit) (ref. Agreement Clauses 59–60).	May 2007 and ongoing	Wilf White	ii. Mechanisms in place for those with sensory impairments to request relevant accessible documents.	Ofcom code Recommendations following involvement with disabled stakeholders (ref. CM&F report)	
	iii. The BBC will seek to identify in advance of meetings or consultations <u>related to the BBC's implementation of the Ofcom code</u> any specific requirements and/or support needs and will make appropriate adjustments in order to facilitate full participation by disabled people – whether members of the BBC staff, members of Ofcom's staff or representative persons (ref. Agreement Clauses 59–60).	May 2007 and ongoing	Wilf White	iii. Relevant meetings are held in fully accessible venues, meetings are supported by a sign language interpreter and if requested a palantypist and/or any other specialist services identified prior to the date.		

Objective	Action	Due Date	Lead	Evidence/Outcomes	Driver/ Informed by	Status
3. To ensure specific financial information is fully accessible, through meeting the various communication needs of all disabled people	i. The BBC will ensure that copies of the Annual Report & Accounts will be provided on request, to disabled persons in Braille or audio versions (within a maximum time limit) (ref. Agreement Clause 74).			i. Evidence of prompt provision of audio and Braille versions of the Annual Report & Accounts (when requested) and additional alternative formats (as applicable), to facilitate full and equal access to such public documents for disabled persons and carers.	DDA 2005 BBC Values: - Audiences - Respect - Recommendations following involvement with disabled stakeholders (ref CM&F report)	
4. To ensure all disabled people have equal access to specific public information announcements	i. The BBC will seek to ensure that all access service commitments are fully met when broadcasting or otherwise distributing announcements concerning defence and emergency arrangements (ref. Agreement Clause 81).		Wilf White (Television) Tony Ageh (Online)	i. Broadcast distribution announcements concerning defence and emergency arrangements are fully accessible and clearly understood by all groups.	DDA 2005 BBC Values: - Audiences - Respect - Working Together	

NB: Agreement clauses 87 and 88 have been defined as not relevant to the Disability Equality Duty.

Annex

The BBC's Public Functions

A. TV Licensing

1. Promotion of licensing requirements: Communication with general public
2. Promotion of licensing requirements: External stakeholder management
3. Customer relations
4. Operations: General
5. Operations: Policy development (which covers new and existing policies)
6. Operations: Database management
7. Operations: Payment processing
8. Operations: Issuing licences
9. Enforcement: Visiting and prosecution
10. Procurement.

B. The BBC Trust in relation to certain functions under the BBC Charter and Agreement

The following functions of the BBC Trust are public functions for the purpose of this Scheme:

Charter

Article 22

The Trust has responsibility for:

- BBC stewardship of the licence fee revenue and its other resources.
- upholding the public interest within the BBC particularly the interest of licence fee payers.

Article 23

General duties of the Trust.

Article 24

- Assessing the performance of the Executive Board and holding it to account.
- Issuing service licences for BBC services.
- Discharging the regulatory functions accorded to the Trust and holding the Executive Board to account for the BBC's compliance with programme standards, quotas and the law.
- Setting the framework within which the BBC should handle complaints.
- Conducting investigations into any activity of the BBC which it suspects does not comply with the requirements supervised by the Trust.
- Commissioning Value For Money investigations into specific areas of BBC activity.
- Setting the BBC's fair trading policy and holding the Executive Board to account for compliance with it.

- Setting an approvals framework within which the Trust will assess proposals from the Executive Board for new services, significant changes to existing services, commercial services and other activities.
- Ensuring arrangements for collection of the licence fee are efficient, appropriate and proportionate.
- **Article 25**
The Trust must adopt and publish Protocols setting out a detailed framework within which the Trust will discharge its functions.
- **Article 26**
Protocols must require the Trust to seek the views of and engage with licence fee payers and set out how it will do so. The Trust must consult publicly before adopting any protocol under Article 27.
- **Article 27**
Protocols on openness and transparency.
- **Article 39 (7) and (8)**
The Trust shall set out in a Protocol details of how Audience Councils are to be set up, run and recruited. The Trust may make whatever arrangements it considers appropriate for supporting the work of the Audience Councils.
- **Article 45**
 - The Trust must consider the Annual Report and Statement of Accounts prepared by the Executive Board and prepare a commentary.
 - The Trust must transmit the Report of accounts and its commentary to the Secretary of State.

Agreement

- **Clause 5** – The Trust shall prepare purpose remits for each of the six public purposes. The Trust shall consult publicly about these. The Trust must keep these under review and may amend them.

- **Clause 11(6)** – The Trust may approve the launch of new UK public services, or termination or material change to the nature of existing services.
- **Clause 15**
In performing its functions in relation to the UK public television services, the Trust shall have regard to the purposes of public service television broadcasting set out in section 264(4) of the Communications Act 2003.
- **Clause 18**
The activities which need a service licence.
- **Clause 19**
Before issuing a service licence, the Trust must have consulted publicly.
- **Clause 20**
The Trust must review service licences periodically and at least once every five years. The Trust must publish information on its intended programme of reviews. In reviewing a service licence, the Trust must consult publicly.
- **Clause 21**
(In relation to the BBC's Statements of Programme Policy)
(5) The Trust must monitor the BBC's performance in carrying out the proposals. Each Annual Report presented by the BBC shall contain a report on the performance of the BBC in this area.
- **Clause 22(3)**
It is the Trust's responsibility to ensure that the principles which underlie the treatment of services are, where relevant, applied to non-service activities in a way which the Trust considers appropriate to the circumstances.
- **Clause 25(2)**
The Trust must judge when the Public Value Test must be applied before a decision is taken to make any significant changes to the UK public services.

- **Clause 26(4), (5) and (6)**

The Trust must consider the outcome of the Public Value Assessment and the Market Impact Assessment and reach provisional conclusions regarding the proposed change.

The assessments must be published. The Trust must consult about its provisional conclusions.

- **Clause 41**

The Trust must provide the Secretary of State with an Annual Report.

- **Clause 42**

The Trust shall secure the efficient use of the radio spectrum available for use by the BBC or its contractors.

- **Clauses 43–46 – CODES etc**

Duties of the Trust in relation to programme codes, etc.

- **Clause 48**

The BBC must include party political broadcasts and referendum campaign broadcasts. The Trust must determine which of the UK public broadcasting services are to include these and the basis on which and the terms and conditions subject to which such broadcasts are to be included.

- **Clause 50**

The Trust must impose on the Executive Board the requirements it considers appropriate in relation to programming for the nations and regions. The Trust must consult Ofcom on these proposals and must not make certain changes without the agreement of Ofcom.

- **Clause 58**

The Trust must impose the requirements on the Executive Board in relation to the production of radio programmes and material for online services.

- **Clause 61**

The Trust shall require the Executive Board to draw up and from time to time revise a code of practice in relation to the commissioning of independent productions.

- **Clause 65**
The Trust must after a public consultation adopt and publish a statement of policy on fair trading. The Trust must keep the policy under review and conduct a comprehensive review at least every three years.
- **Clause 66**
The Trust must publish a statement of its duty to have regard to the competitive impact of the BBC's activities on the wider market. The Trust must adopt and publish codes dealing with those aspects of the operation of the UK public services that in their view could raise significant issues regarding the competitive impact to the BBC's activities.
- **Clause 85(2)**
(In relation to the Executive Board's report on equal opportunities and training arrangements)
The Trust must publish its observations on the report.
- **Clauses 89 and 90 – Complaints**
The Trust must set and publish one or more frameworks for dealing with complaints. This must include the handling and resolution of complaints about the observation of the relevant programme standards.

C. The BBC in relation to certain functions under the BBC Agreement

The following functions of the BBC are public functions for the purpose of this Scheme:

Agreement

- **Clause 12**
Making the UK public services widely available.
- **Clauses 34–41**
The BBC's obligations in relation to digital switchover.
- **Clauses 59–60**
Code relating to provision for the deaf and visually impaired and power to modify targets.

- **Clause 74**
Reports and accounts about the commercial services.
- **Clause 81**
The BBC may be requested to broadcast or distribute announcements in relation to defence and emergency arrangements.
- **Clause 87**
The BBC may be directed to monitor and record specified media output. In complying with such direction the BBC is to be regarded as an agent of the Crown and to be acting in the public interest.
- **Clause 88**
Monitoring activities under the direction of a Government Minister.