

Response by the National Association of Deafened People (Registered Charity no 294922) to Ofcom Consultation: Changes to the digital television and digital radio technical codes.

The National Association of Deafened People (“NADP”) is a nationwide charity run by its members who are deafened. Our members have experienced hearing loss to varying degrees during their lifetimes. Some have had a hearing loss since birth or early childhood, others may have become deafened suddenly during adulthood . Many share a gradually deteriorating hearing loss with age. Our members have a wide ranging experience dealing with their hearing loss, many use hearing aids while others have been fitted with Cochlear Implants. Our membership includes people of working age and those who have experienced deafness during their working lifetime. NADP welcomes the opportunity to respond to this consultation.

Consultation Question 1. Do you agree with our proposals for adding requirements to the Television Technical Code and Digital Radio Technical Code relating to resilience of broadcast networks and access services?

We have been encouraged by how Ofcom and the Commercial Public Service Broadcasters responded to the incident at Broadcast Centre and particularly how those affected have reviewed their processes and disaster recovery facilities to minimise the risk that such an event reoccurs. We agree that it is essential that the systems are regularly tested and adequate numbers of trained staff are available to ensure the service remains fully functional. This should also cover how and when those members of the public affected will be communicated with in a timely and informed manner so as to reassure them that their needs are being addressed, along with appropriate remedies in the short and longer term.

NADP welcomes Ofcom’s proposal to include a requirement on the Commercial Public Service Broadcasters to cement the importance of access services alongside vision and sound for those programmes that are scheduled to carry them. We have long advocated that subtitles should be treated with the same priority as audio, in particular, in all broadcasts to ensure that everyone can enjoy this content in the same way as their peers regardless of their level of hearing. We are optimistic that this proposal will encourage all involved in the preparation, production and distribution of broadcast content to consider subtitles at each stage and ensure they are offered alongside audio and video as the content moves along the chain. Ultimately, we are hopeful that this proposal will encourage a change in the mindset of all involved in the content production and distribution chain such that accessibility is seen as a necessity rather than an afterthought as has otherwise been the case historically.

In addition, we would want to see that the quality of subtitles is at the same level as offered for audio, and video, in that as far as realistically possible it is synchronised completely. This would mean that people who rely on lip reading can switch seamlessly between subtitles and lip reading, and that people who hear some audio can switch between audio and subtitles as their hearing dictates. Furthermore, the positioning of subtitles should be such that they do not obscure any areas where a viewer needs further information that would otherwise be enjoyed by other viewers such as scores or peoples faces, for example. We trust that Ofcom will include these necessities in their requirements.

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