

Your response

Question	Your response
Question 1: Do you have any comments on our proposed approach to making these changes?	<p><i>Is this response confidential? – Y N (delete as appropriate)</i></p> <p>We are pleased to see that Video on Demand (VoD) services will also be considered in these Best Practice Guidelines. We know that there can be a varying levels of quality across different services and platforms which can impact how people with hearing loss and who are deaf watch video programming. Until the proposed obligations to provide access services on VoD comes into effect, we agree that VoD service providers should ensure that they are delivering high quality subtitles and signing that meet the best practice standards set by Ofcom.</p> <p>We also believe that it is positive to expand the Guidelines to consider further conditions that might impact how you watch TV, and that challenging more broadcasters to think of these groups will be beneficial to people with hearing loss and people who are deaf who may also be neurodivergent or have cognitive conditions. We would encourage these conditions to not be considered in isolation, and for Ofcom, broadcasters and VoD services to take an intersectional approach to ensure that the needs of people with multiple conditions are not forgotten.</p> <p>We also support an outcomes-based approach that enables flexibility and personalisation, especially in the context of developing technology and increased on-demand viewing. We know from our own research that audiences with hearing loss and who are deaf want to be able to change the size and position of subtitles. This was particularly important for people who watch programmes on their phone or tablet, as our research found that 70% of respondents who watch on these devices thought it was an important feature to have.¹ There may be situations where a more prescriptive approach is still useful, for example the choice of font in order to ensure that subtitles remain clear and readable for people who may have hearing loss and sight loss. We encourage Ofcom to consider this in their final draft.</p>

¹ RNID, Subtitle It Report, May 2023 <https://rnid.org.uk/wp-content/uploads/2023/06/RNID-Subtitle-It-Report-new-1.pdf>

Question 2: Do you have any comments on our proposed additions to the TV Access Services Code?

Is this response confidential? – ~~Y~~ N (delete as appropriate)

Proposed addition: access services must be of sufficient quality to contribute to fulfilling quotas

We highly support the proposed addition to make access service quotas fulfilment dependent on the quality of access services provided. We know that for people with hearing loss and people who are deaf that low quality subtitles (where the accuracy of the subtitles is poor, or the latency is very out of sync with the speech) can find the subtitles unreadable and confusing- rendering the service useless. Sign language users rely on signers being visible and sufficiently qualified when translating content into British Sign Language- otherwise they too cannot follow the speech of a TV show.

Some service providers may be tempted to seek out cheaper access service solutions, such as automatically generated subtitles which may not yet accurately capture what is being said and lack clarity of punctuation. It is positive that Ofcom will strengthen its expectations to deter providers from avoiding their duties to customers with hearing loss and who are deaf and make it clear that there will be consequences if they do not meet quality standards. Additionally, we hope that it will lead to further investment in improving the quality of live subtitles, where the latency or accuracy of subtitles is lower than on pre-recorded content.

Proposed addition: clarified expectations around communication with audiences about access service availability

We support clarified expectations around communication with audiences about access service availability as we know during the Broadcast Centre incident in September 2021 where several television services were taken off air and access to subtitles, audio description and signing was severely disrupted. On Channel 4 normal subtitle revision was not resumed until November 2021.² Many channels were slow to provide accessible information to audiences with hearing loss and who were deaf to explain why they can't access subtitles and where they can find accessible content. In some cases, our supporters told us that they thought their TVs were broken as they were not aware that something had gone wrong for the broadcasters rather than in their own homes, and many people were keen to understand why it was taking so long to be resolved on Channel 4. A lack of accessible information prevented this from happening. For information to be accessible it should be available in sign language and written in plain English, it should be highlighted on main pages, social media and, where possible, during broadcasts.

Service providers should ensure that if content is available elsewhere with access services that viewers should be directed towards it. For instance, if it is available in BSL on a second channel, or on VoD with subtitles, then that should be flagged at the beginning of the broadcast to help viewers find accessible content.

² Ofcom, Broadcast Centre Incident Review, 20th June 2022, https://www.ofcom.org.uk/_data/as-sets/pdf_file/0032/238964/incident-review-red-bee-media.pdf

	<p><i>Proposed addition: clarified application of quotas across different platforms</i></p> <p>RNID supports clarified application of quotas across different platforms to make it clear that broadcasters and service providers have to meet the quotas individually on each platform rather than as an average. Although we understand that technical barriers can be responsible for creating variation in access service provision across platforms for the same service, we hope that this addition would incentivise greater investment in resolving these pain points with particular platforms. This is especially the case where people have paid for satellite TV or extra services expecting them to be accessible but have found out that they may not be able to take advantage of every aspect the service has to offer.</p> <p>In addition to this, updating the code to remind broadcasters that any emergency announcement should be provided in an accessible format is very important. For people with hearing loss, this would include clear text on the screen. For deaf BSL users, there would need to be a BSL interpreter on the screen translating the emergency announcement.</p> <p><i>Proposed addition: clarification that subtitling is primarily for people with hearing loss</i></p> <p>We support the updating of language to move away from the use of terms such as hearing impairment and sight impairment, which can be seen as outdated or offensive towards people with sensory loss as it suggests there is something intrinsically wrong with them. We'd like to see the use of the terms 'people with hearing loss and people who are deaf'. We believe that this language would be more representative of the audiences who would benefit from this service. Not everyone who is deaf has experienced hearing loss and may have been born deaf and identify as Deaf, whereby they are sign language users and see themselves as members of the Deaf community.</p>
<p>Question 3: Do you have any comments on any of the following proposed changes/additions? Please provide any additional evidence you think we should take into account.</p> <ul style="list-style-type: none"> • Understanding audiences • Developing strategies • Programme selection and scheduling 	<p><i>Is this response confidential? – Y N (delete as appropriate)</i></p> <ul style="list-style-type: none"> • Understanding audiences <ul style="list-style-type: none"> ○ <i>Proposed addition: Providers should make their programming more accessible to people with other disabilities (beyond people with sight and/or hearing loss)</i> ○ <i>Proposed addition: Providers should offer customisation options and choice for viewers where practical, while also ensuring these services are easy to use</i> ○ <i>Proposed addition: Providers should bear in mind the broader benefits of access services for all viewers</i> <p>We support the expansion of the Guidelines to acknowledge the needs of people with other disabilities. People with hearing loss can have other conditions which may affect their ability to watch TV, such as sight loss or neurological differences, and we think it is positive that Ofcom is encouraging broadcasters and VoD service providers to consider more needs. We think that an intersectional approach that also considers how</p>

- National emergencies and important on-screen information
- Promoting awareness
- Accessibility and diversity in production
- Training
- Monitoring of quality

people with multiple conditions might experience TV would be of the greatest value.

We believe that it is important that the best practice guidelines keep up with technological advance and trends within access services in order to remain fit for purpose in the future- we see customisation as a key part of this going forward and should be reflected in the guidelines. The RNID Subtitle It survey found that 67% of respondents believed that it was important to change the size of subtitles on their TV. Only 50% of respondents were aware that on some platforms you can change the appearance of subtitles, but a majority of those that were aware had used the customisation function. We also found that in specific contexts, such as sports matches, the positioning of subtitles could disrupt the viewing experience and make it harder to follow the gameplay or scores. By providing more customisation viewers are able to improve their TV watching experience. We also found that 72% of BSL users felt that it was important to be able to change the size of their interpreter on their TV or mobile. This is because superimposed interpreters can obscure parts of the TV shows and viewers feel like they are missing out. Increasingly, people are using alternative methods of watching TV- such as through their laptops, tablets and phones. We found that over 70% of respondents that watched programmes on their phone or tablet through that it was important to be able to change the size and position of subtitling.³

We know that research has shown that increasingly people without hearing loss have been using subtitles. In 2023, YouGov found that 61% of people aged 18-25 surveyed prefer having subtitles turned on when watching TV or films.⁴ Therefore, the access services do clearly provide a broader benefit for all viewers. Additionally, we would like to highlight that many people with moderate hearing loss might not identify as disabled or needing hearing aids yet, but still benefit from having subtitles to follow the speech in a TV show. By making sure that subtitles are seen as a broader service to society, our audiences will benefit- but we want to ensure that broadcasters understand that for people with hearing loss and who are deaf, subtitles are not a preference but a vital way of accessing video content.

Additionally, increasing availability of signing services will raise awareness of the needs of deaf BSL users among people who may not come into contact with any members of the Deaf community in their day to day lives. In this sense, signing can also be seen as an educational tool.

- Developing strategies
 - *Proposed addition: Providers should increase access service provision as far as possible, while considering how best to balance their investment between quality and quantity of accessible programming.*

³ RNID, Subtitle It Report, May 2023 <https://rnid.org.uk/wp-content/uploads/2023/06/RNID-Subtitle-It-Report-new-1.pdf>

⁴ YouGov, 24th February 2023, 'When watching TV shows or movies in your native language, do you generally prefer to have the subtitles on or off?', <https://yougov.co.uk/topics/media/survey-reports/daily/2023/02/24/9a34f/3>

- *Proposed addition: Encourage providers and content suppliers to include access service files as part of acquiring/ selling content.*
- *Proposed addition: providers should ensure that the use of new technologies enhances the quality of access services*
- Proposed addition: Encourage providers to consider additional means of improving the accessibility of their programming (such as using Makaton/ improving dialogue audibility etc)
- Proposed addition: Guidance on developing accessibility action plans

We strongly support any proposed action that recommends the increased provision of access services beyond any quota broadcasters or VoD services face. Many people with hearing loss or who are deaf expect subtitles to be available on what they are watching wherever they are watching, and we know many public service broadcasters already exceed their annual quotas for subtitling on linear channels.⁵ Although there is also a trend of broadcasters over-achieving their signing quotas, this is to a much smaller degree and encouraging greater provision would be a benefit to BSL users who currently do not have a large selection of content to choose from to watch in their first language. We also agree with Ofcom that increased provision should not be at the expense of the quality of access services.

Similarly, we support Ofcom's encouragement to ensure that access services are shared as part of a content acquisition deal between services. In our speaking with broadcasters we know that there have been barriers to creating sign-interpreted shows due to the acquisition agreements not permitting multiple versions of a show being hosted on an VoD platform, and we believe it would also be of value for the advice to acknowledge that acquisition agreements should also allow for signed versions to be created.

On the topic of new technologies, we are happy to see Ofcom highlighting the benefits of new technology to improve provision. In areas such as live broadcasting there is hope that automated subtitles can increase the speed of the delivery of the service. Improved latency would make subtitles more readable for people with hearing loss. However, as acknowledged by Ofcom, this cannot be at the expense of the accuracy of subtitles. For live broadcasts, such as news or significant public events such as Government speeches, ensuring that subtitles are representative of what is being said is very important as there may be consequences for the audience if they miss out on vital information. For example, during the Government briefings throughout the Covid-19 pandemic, people with hearing loss had to rely on subtitles in order to understand what social distancing measures were being implemented. Additionally, people with sensory loss are more likely to lack the digital skills to be able to access news online, with the Lloyds Consumer Digital Index report finding in 2022 that only 55% of those with sensory loss (vision or hearing) have 'foundation level' digital skills compared with 87% of people with no impairment.⁶ Additionally, 70% of UK adults use broadcast TV as their news source, and older audiences, who are

⁵ Ofcom, Television and on-demand programme services: Access services report – January to December 2022

⁶ Lloyds Bank, 2022 Consumer Digital Index, November 2022, https://www.lloydsbank.com/assets/media/pdfs/banking_with_us/whats-happening/221103-lloyds-consumer-digital-index-2022-report.pdf

more likely to have a hearing loss, are more likely to use broadcast TV. This makes it all the more necessary for live linear TV to be accessible- especially for news and significant Government announcements. For signing, we know that AI and avatars are being explored as solutions to increase the provision of signing across different sectors. We are not confident that these will be appropriate in the short term as a method to provide BSL on TV but know that in the future they may be viable. As acknowledged by Ofcom, the current best practice in subtitle development still requires human intervention to ensure that any automated subtitles are accurate and have appropriate punctuation.

We are also pleased to see the inclusion of encouraging providers to consider improving dialogue audibility as an additional access service. Enhanced dialogue audibility would provide more consumer choice for people with moderate hearing loss, and counter some of the difficulties that home speakers can have in processing sound that has been mixed for cinemas.⁷ In the future we would hope that this technology would be available to all consumers.

For the action on developing accessibility action plans, we strongly support the suggestion that people with lived experience of sensory loss are involved in their development and agree that senior management involvement is necessary to ensure that these plans have the support they need to be implemented as a priority.

- Programme selection and scheduling
 - Proposed addition: Providers should prioritise making occasions of national importance accessible with subtitling, signing and spoken descriptions.
 - Proposed addition: Providers should make every effort to add access services to VoD programming as soon as it is made available
 - Proposed addition: VoD providers should consider the popularity and usability of given platforms and consult with audiences and/or disability groups in choosing which to prioritise

RNID are particularly happy to see the inclusion of our suggestion that occasions of national importance, such as the Coronation or General Election coverage, be made accessible for deaf audiences. Currently many are available with live subtitles but signing should also be offered to be access for deaf BSL users. In defining what 'moments of national importance' should include, events that bring the nation together, such as major sporting events (such as the Women's World Cup final), consequential Government announces (such as the resignation of a Prime Minister), or large-scale cultural events (such as Eurovision) should all be covered. For Sports, potentially Ofcom could use the events listed in the Code on Sport, which sets out which sporting events are of national interest

⁷ Katie Cunningham, "Mumbling actors, bad speakers or lazy listeners? Why everyone is watching TV with subtitles on", 27th January 2023, *The Guardian* <https://www.theguardian.com/tv-and-radio/2023/jan/28/mumbling-actors-bad-speakers-or-lazy-listeners-why-everyone-is-watching-tv-with-subtitles-on#:~:text=First%2C%20look%20for%20the%20speaker,sit%20down%20to%20watch%20television>

as a guide for what sports events should be made accessible.⁸ The Where's the Interpreter Campaign showed the widespread anger from the Deaf community when they were unable to access consequential covid announcements, which caused much anxiety and led to greater risk of individuals falling for misinformation.⁹ Having interpreters available for moments of national importance goes further than just providing accessibility, it also provides important representation for the Deaf community on screen and makes it clear that they are part of the moment as well.

We strongly support the inclusion of advice for TV content to be made accessible with subtitles or signing as soon as it is available on VoD services. It is unfair for deaf and audience members with hearing loss to have to wait longer to watch content than hearing people.

For the proposed action on prioritising which platforms should have access services, any advice should also direct VoD service providers to make it clear to consumers where their content is available with access services.

- National emergencies and important on-screen information
 - Proposed addition: Providers should ensure that broadcast information about national and local emergencies is subtitled, signed and spoken
 - Proposed addition: In accessible programmes, important on-screen information should also be accessible.

We support the proposed actions on National emergency broadcasting being made accessible. The guidance should make it clear that signing should be provided in British Sign Language (BSL) and that subtitles need to be of the highest standard possible to ensure that the information is accurate and there is little confusion.

- Promoting awareness
 - Proposed addition: Extended advice on communicating with relevant audiences and raising awareness
 - Proposed addition: Awareness guidance applied to VoD providers
 - Proposed addition: Encourage provision of pre-sale information on accessibility

RNID are pleased that further guidance could be made to broadcasters and VoD services on how best to communicate with audiences that use access services. It is positive to include the lessons learnt from resolving the last major outage of subtitles in 2021, whereby audiences had to wait for updates to find out when access services would be restored. It is important that this guidance emphasises the importance of information being communicated in clear, plain English and BSL. We also hope that this information is available during linear broadcasts and clearly on VoD platforms so that viewers will be able to find out what has happened.

⁸ Ofcom, 1 Code on Sports and Other Listed and Designated Events, 30th April 2010
https://www.ofcom.org.uk/data/assets/pdf_file/0029/35948/ofcom_code_on_sport.pdf

⁹ About, <https://wheretheinterpreter.com/> last accessed 21st September 2023.

We also agree that it is important that VoD providers engage with audiences, particularly around the availability of BSL versions of shows in their catalogues as often it can be harder to find content in BSL on platforms where the mainstream version is highlighted on the homepage, but the signed version hidden away. Having a dedicated section of an VoD service with the signed content may be a good starting point to highlight accessible versions.

We strongly support the proposed addition for paid VoD services, including subscription VoD services, to include information about the availability of subtitles before people make their purchase. RNID found that 90% of people who took our Subtitle It Survey in 2023 believed that paid VoD services should have to tell audiences how many of their programmes have subtitles before they pay. This is because over 85% of people told us that they used a subscription service in the last year and found that there were no subtitles available for what they wanted to watch. This means despite paying the same as hearing customers, people with hearing loss and who are deaf have a more limited selection of content that they can watch. Being informed about the provision of subtitles and signing on a service before paying will help consumers make more informed decisions and hopefully also encourage services to provide better provision so they can show consumers how accessible their content is.

- Accessibility and diversity in production
 - Proposed addition: Providers and content makers should consider accessibility issues early on in the commissioning and production process.
 - Proposed addition: Teams involved in making accessible programming, including audio describers and signers, should reflect the diversity of their audiences

It is really positive to encourage the awareness of access services while commissioning and producing TV shows.

For members of the Deaf community, representation on mainstream TV is meaningful but often the shows are not available with BSL interpretation and therefore the whole show is not accessible to them. It should be a priority to sign shows which have deaf characters. Additionally, while deaf BSL characters or presenters are signing in a mainstream show, the camera may cut away from them or zoom into their face so that their hands and upper body are no longer visible. It is important that production companies are aware of BSL and how as a language it relies on hand shapes and movements, shoulder movements, facial expressions, and lip patterns; all of which need to be visible to viewers.

We also support Ofcom's recommendation to encourage the TV industry to become more diverse to raise awareness of the needs of people with hearing loss and who are deaf.

- Training
 - Proposed addition: People making access services (including subtitles, audio description and signing) should be appropriately trained.

We support making it clear that people producing subtitles should be trained appropriately, we understand that these guidelines need to be future proofed and as technology and techniques for subtitling evolve it would be better to have flexibility regarding what is considered 'appropriate'. However, we would find it helpful for Ofcom to offer some clear examples of what would be considered appropriate training so that people producing subtitles have an understanding of the audiences they are serving.

For BSL interpreted content, it is important that it is made clear that only qualified interpreters and translators should be used. For sign-presented, this is less necessary as it is an opportunity for deaf BSL users to tell stories in their own language and they may not have advanced sign language qualifications. However, if the sign-presented content is being broadcast with captions in English, a qualified translator should be used to ensure that what BSL user is signing is being accurately represented.

- Monitoring of quality
 - Proposed addition: Providers should consider using quantitative tools to assess the quality of their access services
 - Proposed addition: Feedback/complaints routes should be accessible at all points in the process, from providing a variety of complaints routes to responding in plain language
 - Proposed addition: Providers should seek feedback proactively, rather than relying only on complaints.

RNID agrees that it would be good for providers to use more quantitative tools to measure the quality of their subtitling latency and accuracy. We hope that they would also measure their progress and share their results so that they can be held accountable.

We know audiences can sometimes feel like they do not get enough acknowledgement from broadcasters or on-demand providers about why they can't access subtitles on certain platforms or on certain shows. Additionally, if methods to make complaints are not accessible then people will be less likely to flag what is not working well for them. BSL users may want to share their thoughts with services in their own language, and RNID believe that services and broadcasters should consider providing a VRS service whereby BSL users can contact them instead on written forms or phone numbers. Furthermore, we know that digital stores with on-demand films and shows available to purchase can be particularly hard to communicate with and as a charity we can also struggle to follow up on behalf of supporters.

It is also sensible to seek feedback proactively, especially from BSL users who often find the format for surveys harder to use as their first language is BSL instead of English. We would recommend user interviews and focus groups with interpreters provided to gather insight on a regular basis to find out what sort of shows BSL users would like to be available in BSL.

<p>Question 4: Do you have any views on how developments in technology may inform the production of access services in the coming years?</p>	<p><i>Is this response confidential? – Y/ N (delete as appropriate)</i></p> <p>RNID is really excited about the potential of object media to improve the provision of access services.</p> <p>We think that enhanced dialogue audio will also be a service we'd like to see encouraged more.</p>
<p>Question 5: What do you think about the proposed list of external sources/ guidelines in Annex 3? Are there any additional sources which Ofcom should refer to?</p>	<p><i>Is this response confidential? – Y/ N (delete as appropriate)</i></p> <p>We are pleased that Ofcom have sign posted RNID for information on facts and figures on hearing loss and tinnitus, we also have statistics, information and resources on BSL too which we would like broadcasters and on-demand service providers to be aware of. Additionally, it might be helpful to make clear that our 2023 Subtitle It report represents the perspective of people with hearing loss and who are deaf and use subtitles and signing.¹⁰</p>
<p>Question 6: Do you have any comments on the following suggested changes relating to subtitling? Please provide any additional evidence that you think we should take into account.</p> <ul style="list-style-type: none"> • Subtitling speeds • Live programming • Subtitling presentation • Sound and music descriptions • Language of subtitling 	<p><i>Is this response confidential? – Y/ N (delete as appropriate)</i></p> <p>RNID support the notion that more accurate subtitles should be prioritised over fulfilling a prescribed speed, within reason. We know that where speech is paced differently to the subtitles, making lip reading harder and also being harder to follow who is speaking at a given time. However, the speed should not be at the expense of readability, and Ofcom should make it clear that there will be some contexts where synchronicity may have to be compromised to ensure that people can read the subtitles. We also hope that the Guidelines encourage broadcasters to continue to listen to audience feedback on how they are finding the subtitle speeds to ensure access to the information is as inclusive as possible.</p> <p>We hope that for live subtitles the latency does not get worse with the removal of three second maximum latency recommendation. As technology improves, the hope is that balance of accuracy and latency would be reduced, and viewers would see less of a difference between live and pre-recorded subtitles. Additionally, there may be some genres of shows where accuracy is more important than latency. For example, news programmes or broadcast Government announcements where important information is shared with the public. We would also echo the recommendation that shows with pre-recorded segments, such as news programmes or game shows, should do their best to prepare the subtitles in advance so that the latency and accuracy is less of an issue.</p> <p>We believe that there may be some contexts where it is necessary to provide more detailed guidance on the appearance of subtitles, such as the font. For people who may use subtitles but also have some degree of sight</p>

¹⁰ RNID, Subtitle It Report, May 2023 <https://rnid.org.uk/wp-content/uploads/2023/06/RNID-Subtitle-It-Report-new-1.pdf>

	<p>loss, having a clear, readable font is very important and potentially outweighs the need to have choice. Consistency of symbols is also important to ensure that people can understand what they mean and not get confused.</p> <p>Our research found that 47% of people thought it was important to be able to change the colour of subtitles. Furthermore, 50% of respondents thought it was important to have labels to denote who was speaking at a given time. This suggests there is no clear consensus on if colour or labels is better, and we agree it should be clearly identified in the subtitles in whichever method is most appropriate. For example, where a new character enters a scene but is not yet on camera, it would be sensible for subtitles to use a label to show who is speaking if the hearing audience would be able to recognise their voice.</p> <p>Customisation is increasingly available on on-demand platforms, and we think it is a positive step allowing people greater access to subtitles. Our research found that being able to change the size of subtitles was particularly important for people who watched video content on tablets and smartphones as the smaller screen size meant it could either be hard to read small font sizes or bigger font sizes could obscure the video. Over of respondents that watch 70% programmes on their phone or tablet think it is important to be able to change the size and position of subtitling. Even on televisions, 67% told us that they felt that changing the size of subtitles would be an important feature. We agree that not all features are equally important to be able to customise and our research showed that position and size where the most features to customise.</p> <p>We support more detailed descriptions of music to create a better understanding of how the music is contributing to the mood of the show. We agree that audiences have positively received more creative subtitles in shows such as Stranger Things, and that encouraging further specific descriptions will enhance the experience of people with hearing loss and people who are deaf.</p> <p>We support subtitles being available in the language of the intended show. In cases where characters switch between languages, it should be made clear to the audience what language they have switched to.</p>
<p>Question 7: Do you have any comments about the other proposed changes to the subtitling guidelines, as summarised in Table 1 (Annex 1)?</p>	<p><i>Is this response confidential? – Y / N (delete as appropriate)</i></p> <p>We support many proposed changes laid out in Annex 1. We'd especially like to highlight that broadcasters need to bear in mind their targeted audiences and that subtitle users have varying needs. This is particularly true for informative shows such as news or Government broadcasts where the accessibility of the information providing is of particular importance.</p> <p>Additionally, we welcome the proposed change of content of particular interest to the deaf community being prioritised, as shows with Deaf representation or characters experiencing hearing loss should be made accessible to audiences who would resonate with those stories. We do want to highlight that in the same way the public has very diverse taste in TV content, the people with hearing loss and people who are deaf also have</p>

	<p>lots of different opinions about what they want to watch, and it is important that a wide range of shows are made accessible through subtitles.</p> <p>Additionally, we support the advice to not censor subtitles. Deaf people and people with hearing loss can find it infantilising to have swear words censored where they are spoken but not censored in the audio of a show. Deaf people do not want to be protected from swear words and it can also disrupt their experience of following along.</p> <p>Additionally, the point about BSL users having slower reading speeds is due to failures in the education system and not due to their deafness. Some studies have found that the reading age of Deaf school leavers at 16 on average is just 9 years old.¹¹ It is important to raise awareness that written English is not always a reasonable adjustment for deaf BSL users; however, we know 9/10 BSL users who took Ofcom’s Survey on TV Viewing Among BSL users said that they watch subtitled content and only 1/10 said they couldn’t follow using subtitles only. The guidance could benefit from directing broadcasters to this research to help them understand BSL preferences better.</p> <p>We would finally like to just highlight that it may still be useful to some older audiences to have the word ‘subtitles’ if they are used to using it.</p>
<p>Question 8: Is there anything additional that you think should be added to the revised guidelines on subtitling?</p>	<p><i>Is this response confidential? – Y / N (delete as appropriate)</i></p>
<p>Question 9: Do you have any comments on the following suggested changes relating to audio description? Please provide any additional evidence that you think we should take into account.</p> <ul style="list-style-type: none"> • Approaches to/ styles of audio description 	<p><i>Is this response confidential? – Y / N (delete as appropriate)</i></p>

¹¹Dr Kate Rowley, ‘Reading Development in Deaf children’ published in the *BDA’s Audiology Seminar (Northern Ireland)*, March 2019 <https://bda.org.uk/wp-content/uploads/2019/07/Audiology-Seminar-Report-2019.pdf>

<ul style="list-style-type: none"> • Describing visual features • Describing information about diversity characteristics • Additional audio accessibility features 	
<p>Question 10: Do you have any comments about the other proposed changes to the audio description guidelines, as summarised in Table 2 (Annex 1)?</p>	<p><i>Is this response confidential? – Y / N (delete as appropriate)</i></p>
<p>Question 11: Is there anything additional that you think should be added to the revised guidelines on audio description?</p>	<p><i>Is this response confidential? – Y / N (delete as appropriate)</i></p>
<p>Question 12: Do you have any comments on the following suggested changes relating to signing?</p> <ul style="list-style-type: none"> • Meeting the signing requirements • Selection/ scheduling of signed programmes • Use and preferences for different types of signed programmes among d/Deaf children 	<p><i>Is this response confidential? – Y / N (delete as appropriate)</i></p> <p>We support that BSL should be the default language for meeting signing quotas, as we agree that including Sign Support English or Makaton may lead to more people conflating BSL with these communication tools instead of understanding that it is a language in its own right with its own syntax and grammar. We also support that Irish Sign Language be used to meet the statutory target for audiences in Northern Ireland; however, we hope that Ofcom makes it clear that BSL and Irish Sign Language are both used in Northern Ireland and provision of both languages should be considered in commissioning signed content.</p> <p>We support the suggestion that providers should consult their audiences when determining what they should provide in sign language. Much like the wider public, deaf people have different tastes in TV shows and different preferences in what they think should either be interpreted or sign-presented. It has been great to see some broadcasters, such as BT Sport, commission their own sign-presented programming and invest in training</p>

- Ensuring the quality of sign-interpretation
- Size of sign interpreter image

deaf sports commentators.¹² On-demand libraries of content also allow for a wider choice of signed content to be available to viewers and ODSPs should be encouraged to keep signed content available on their services for as long as possible. We also support the suggestion that news and current affairs programming are particularly important when it comes to signing as BSL users should have access to news to make informed decisions.

Broadcasters should also consult Deaf audiences on when signed content should be broadcast, at the moment they tend to only be shown during less prime-time slots where people may be working or busy. Additionally, where mainstream versions of shows are available at peak times and a signed version is broadcast at a later date outside of peak viewing hours, broadcasters should be advised to signpost viewers to the signed version or on-demand services. Additionally, BSL users should not have to wait for the signed version to be available on linear, and instead should be able to access the signed version on-demand at the same time as the original version. Sign-presented shows may also be of benefit to wider audiences for helping educate the public on issues impacting the Deaf community and broadcasters should be encouraged to not just consider sign-presented content as exclusively for BSL users.

We also support the proposed change to encourage providers to have more representation of BSL within their programming. We know that many producers have not worked with deaf BSL users before, but charities and deaf consultants can play a role in providing advice on how to make shows more accessible for deaf people.

Sign-interpretation on for linear and on-demand content should be performed by qualified interpreters in order to ensure that the translation is accurate and understandable. BSL has a different vocabulary, syntax and grammatical structure to English and therefore the translation may not be completely identical to what is being said, but that is understood by BSL users. There is also regional variation in BSL signs used across the UK and it should be recommended that this is taken into consideration by the interpreter.

In our Subtitle It survey this year we asked deaf BSL users if they would like the option to be able to change the size of the interpreter on screen and 72% told us it was important to be able to adjust the size of interpreter on their smartphone screen or television, 69% on their laptop or computer and 67% on their tablet. Therefore on-demand service providers should explore the possibility of customisable interpreter sizes.¹³

Finally, we support the addition that where sign language is used in programmes it should be clearly in-shot regardless of whether it is for a sign-presented programme or mainstream programme. The front of the upper body of the signer and their face should be visible at all times while they are signing and should be well lit so that their movements and facial

¹² BT Sport, 'BT Sport Launches 'Sign Up' to spotlight the deaf community and enhance accessibility' 22nd December 2022 <https://www.bt.com/sport/bt-sport-united/bt-sport-launches-sign-up>

¹³ RNID, Subtitle It Report, May 2023 <https://rnid.org.uk/wp-content/uploads/2023/06/RNID-Subtitle-It-Report-new-1.pdf>

	<p>expressions are clear. BSL is a combination of hand shapes and movements, lip patterns, facial expressions, and shoulder movements. All these elements need to be visible for deaf BSL users to get the whole benefit of having representation of BSL in a show.</p>
<p>Question 13: Do you have any comments about the other proposed changes to the signing guidelines, as summarised in Table 3 (Annex 1)?</p>	<p><i>Is this response confidential? – Y N (delete as appropriate)</i></p> <p>RNID support recognition of regional variations of BSL signs, but it is worth making it clear that while Irish sign language is a separate language to BSL, the regional variations of BSL are still the same language. The differences include where different signs have been used to represent different things, for instance in Wales there are slightly different signs used for numbers compared to the Southeast of England.</p> <p>On the proposed changes to advice on qualifications, deaf BSL users may not have advanced qualifications in BSL but should still be able to use BSL when appearing on shows if they want to. The current guidance’s caveat that some latitude should be allowed for interviewees and guests should be retained if possible for this situation.</p> <p>On the action on the clothes of interpreters, it might be worth including in the guidance that distracting patterns that do not appear well on screen should also be avoided. Additionally, there may be some occasions where more formal attire is deemed necessary, such as for the Queen’s funeral, which could potentially also be nodded to in the best practice guidelines.</p> <p>We support the clarity around subtitling not being a substitute for BSL. On-demand service providers and linear broadcasters should be aware that deaf BSL users use BSL as their first language and that not all BSL users are able to read subtitles. We hope that this will encourage more programme services to see what they can do to increase their signed content provision on their channels and services.</p> <p>On the topic of audiences, we believe it would be worth adding that people who would like to learn sign language would also benefit from wider provision of signed BSL content.</p>
<p>Question 14: Is there anything additional that you think should be added to the revised guidelines on signing?</p>	<p><i>Is this response confidential? – Y N (delete as appropriate)</i></p> <p>RNID thinks that there should be encouragement to on-demand services to look into the possibility of allowing BSL users to set the size of the interpreter while they watch the TV. This sort of technological adaptation would make watching sign-interpreted content on different devices better, and therefore improve access for BSL users.</p>

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