

Consultation Response

Public Service Content in a Connected Society (Ofcom) 26 February 2015

About us

Action on Hearing Loss is the new name for RNID. We're the charity working for a world where hearing loss doesn't limit or label people, where tinnitus is silenced – and where people value and look after their hearing.

Our response will focus on key issues that relate to people with hearing loss. Throughout this response we use the term 'people with hearing loss' to refer to people with all levels of hearing loss, including people who are profoundly deaf. We are happy for the details of this response to be made public.

Comments

Action on Hearing Loss welcomes the opportunity to comment on Ofcom's consultation regarding public service content in a connected society.

1. Benefits of Public Service Broadcasting

Firstly, we want to highlight the leading role that the Public Service Broadcasters (PSB) have played in making their services increasingly accessible to people with hearing loss through the provision of subtitles and signing. This includes their video on demand (VOD) content where there is currently no legal requirement to provide access services. The BBC provides subtitles for nearly 100% of content on the iPlayer, and according to the regulator, the Authority for Television on Demand, ITV and Channel 5 both subtitle over 70% and Channel 4 subtitles 99% of content through their branded websites¹.

We believe this leadership role in terms of accessibility should be recognised as an achievement of the PSBs. By showing what is possible and raising the expectations of the customer, they encourage other broadcasters and industry to improve the

¹ ATVOD (2014) Provision of video on demand access services

accessibility of their service. The BBC has also played a role in advising other broadcasters and VOD providers how to resolve technical issues, including through the regulator's technical working group². Action on Hearing Loss welcomes this collaborative approach and hopes that the PSBs continue to work together to improve access to television for people with hearing loss.

2. Introducing flexibility for PSBs?

People are using a greater range of devices and platforms than ever before to watch TV and this is also true for people with hearing loss. We conducted a survey in 2014 to establish the viewing preferences of people with hearing loss when watching TV and VOD. Of 670 respondents, 38% said they watch TV on a computer or laptop and a quarter watch on a tablet device, often or sometimes. However, people with hearing loss are restricted in terms of what VOD content they can watch due to a lack of subtitles on most devices and platforms. The BBC provides subtitles across a wide range of devices and platforms, however, ITV and Channel 4 currently only provide subtitles through their branded website. Choice of ways to watch VOD is therefore hugely restricted for people with hearing loss.

There are advantages of VOD services for people with hearing loss such as having all signed programming in one location, such as the BBC Sign Zone. This makes it easier for deaf British Sign Language users to access the content, which traditionally has only been broadcast late at night on linear television. Catch up TV may also provide people who rely on subtitles the chance to watch a live programme at a later date with good quality subtitles.

However, we do have concerns that if PSBs are allowed to show their content through any means, this may mean that deaf and hard of hearing people miss out due to a lack of subtitles and signing requirements. Therefore, whilst we are not fundamentally against the idea of allowing PSBs flexibility as to where their content is shown, we do believe that this would need some regulation to ensure that VOD services are at least as accessible as linear TV.

Conclusion

We believe the PSBs play a leading role in providing accessible TV content for people with hearing loss and help to drive improvements across the industry. However, we believe regulation would be

² The ATVOD Working Group on Access Services

required if PSBs are given increased flexibility to ensure that people with hearing loss are able to access this.

Contact details

Laura Matthews

Senior Research and Policy Officer

19-23 Featherstone Street, London, EC1Y 8SL

laura.matthews@hearingloss.org.uk