

The National Association of Deafened People's response to Ofcom's Prominence and Accessibility on Connected TV Platforms : Consultation on our draft Code of Practice and draft Guidance on the Agreement Objectives dated January 2026.

The National Association of Deafened People ("NADP") is a nationwide charity run by its members who are deafened. Our members have experienced varying degrees of hearing loss during their lifetimes. Some have had a hearing loss since birth or early childhood, while others may have become deafened suddenly during adulthood. Many share gradually deteriorating hearing with age. Our members have a wide range of experiences 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. Most commonly our members rely on English as their first or preferred language and are typically reliant on subtitles or captions to assist their communication. NADP welcomes the opportunity to comment on Ofcom's Consultation on Accessibility on Connected TV Platforms.

In general, we agree with the provisions suggested in Section 4 - Code of Practice: Accessibility of the consultation, where they relate to people with hearing loss. However, we would like to take the opportunity to make a few suggestions in response to question 13.

Consultation question 13:

Do you have any views or evidence on the effectiveness or impact of any other actions in relation to making use of the RTSS and finding/making use of accessible programming?

Please provide your reasoning, and if possible, any supporting evidence.

Filtering via search or disaggregated content areas

For some time NADP has advocated that EPGs should offer the opportunity for the user to be able to filter content according to whether or not it has subtitles. This would make it considerably easier to identify quickly what content is subtitled and therefore enable a viewer to enjoy viewing. Currently the user has to look at the detail of each programme to see whether or not it has subtitles. This can be extremely time consuming particularly given the increasing number of programmes available.

We were encouraged that Ofcom had considered the possibility of filtering for accessibility services but dismayed that it had only considered AD and BSL. It was also disappointing to read the conclusion of this investigation as being dismissed primarily on the basis of AD and BSL metadata availability. It would be helpful to understand why filtering content by subtitle availability was not considered by Ofcom as part of this consultation.

We recognise that subtitled content far exceeds that of AD and BSL but it still falls short of 100% for most channels and until all content is subtitled there will still be a significant amount of content that cannot be viewed by people who rely on subtitles.

We do not believe that there would be a disproportionate cost associated with ensuring subtitled content can be filtered by an RTSS particularly if AI could be used.

Two way feedback on subtitle quality

In this consultation Ofcom has variously mentioned quality subtitles yet there is no measure of what quality means in relation to subtitles; the only metric that Ofcom measures is that of quantity. The consultation also referred to RNID's Subtitle It! Research reporting that 85% of viewers do not watch a programme if it doesn't have subtitles. Our members would argue that metric should also include live programmes where the quality of subtitles is so poor or the latency so long that it is impossible to enjoy the programme content. Most commonly this relates to news broadcasts as provided by PSBs which people with hearing loss should be able to access. NADP have advocated for many years that spontaneous feedback avenues should be available to report live experiences with subtitles both as a way of reporting live issues and as a reporting mechanism. Ofcom has supported the potential development of this reporting mechanism in the past.

With the increasing adoption of Smart TVs it is clear that TV manufacturers are utilising the feedback received from these TVs to adapt the viewing experience. As such RTSS providers are now able to obtain feedback directly from viewers. We believe that there is an opportunity for RTSS providers to utilise this technology to enable a two way feedback on subtitle quality and would ask that Ofcom facilitates a discussion to investigate the possibility of this initiative.

Speech to Text engines

The consultation report mentions Text to Speech availability by RTSS providers to enhance the experience for people with sight loss. We believe there would be a similar advantage for people with hearing loss for the reverse technology (Speech to Text) to be made available by RTSS providers. This could allow items that are not subtitled by the content provider to be subtitled automatically for the user, for example announcements between programmes, lyrics to songs played at the end of a movie, public announcements.

Subtitles for Radio Programmes

Many RTSS providers also offer radio channels which may be inaccessible to people with hearing loss. Some channels however do offer lyrics but rarely are these shown as subtitled programmes. For the programmes that are not subtitled a Speech to Text engine would offer the opportunity for people with hearing loss to continue to enjoy music particularly if they have become deafened during their lifetime. We are aware

that BBC Sounds has been trialling subtitles for a limited number of programmes and would support this initiative to become more mainstream and available through RTSS.

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