

National Association of Deafened People (NADP)

NADP is a charity that supports individuals who have lost all or most of their natural hearing and ultimately experience hearing loss.

Here are the key points in our response:

1. **Inclusion and Accessibility:** NADP emphasises the need for Ofcom to ensure that accessibility is considered from the outset in the development of communication services. We highlight past instances where accessibility was an afterthought, leading to delays and additional costs to providers which could be avoided if people with lived experience are included in early discussion into areas to which they would benefit. Ofcom is in a unique position to facilitate these discussions and bring together all interested and relevant parties for a common purpose of inclusion.
2. **Equitable Access:** our response stresses the importance of equitable access to media for deafened people, particularly through the provision of captions on all platforms. NADP points out the lack of focus on how Ofcom plans to ensure that people with hearing loss are treated fairly and provided with equal access to communication.
3. **Representation and Involvement:** NADP calls for the involvement of people with lived experience of hearing loss in Ofcom's research and decision-making processes, including their employment at Ofcom. We believe that this will lead to more effective and inclusive technology developments.
4. **Diversity and Inclusion Strategy:** NADP acknowledges Ofcom's progress in diversity and inclusion but suggests that people with hearing loss should be targeted separately. We advocate for setting a representative target for people with hearing loss within Ofcom, particularly in areas that affect them directly.
5. **Accessibility of TV Services:** NADP expresses frustration over the slow progress in regulating the accessibility of VoD content and urges Ofcom to ensure that all content is accurately captioned. We remain disappointed at the decision to relax the latency measure of live subtitles from a maximum latency of 3 seconds to

an average latency of 6 seconds. This decision has been detrimental to the enjoyment of live programs including, essentially, national and regional news by many people with hearing loss.

6. **Radio Broadcasts:** NADP suggests that advancements in technology now make it possible to caption radio programs, which would allow deafened people to enjoy these programs as they did before their hearing deteriorated. We note that the BBC has trialed providing caption on BBC Sounds and would like this initiative to be extended and supported.

7. **Telephone Relay Services:** NADP highlights the inadequacies of the current Relay UK service and calls for Ofcom to review and improve the range, quality and conversation speed of telephone services for deafened people. We would welcome further discussions on how a Captioned Telephony Relay Service could be introduced in the UK.

8. **Internet-based Communications:** NADP requests more transparency from Ofcom regarding the solutions offered by communication providers during the switchover from PSTN to VOIP telephony.

9. **Automated Speech Recognition:** NADP points out the need for a minimum quality standard for ASR-produced captions, similar to those for Relay UK, to ensure consistent and accurate service, particularly for web based communication platforms such as Zoom, Teams and FaceTime.

We would welcome the opportunity to meet with the relevant people within Ofcom to discuss the needs of deafened people in the forthcoming year.