

Audiovisual Media Services Directive Consultation

Response from Action on Hearing Loss

About Us

Action on Hearing Loss is the charity formerly known as RNID. Our vision is of a world where deafness, hearing loss and tinnitus do not limit or label people and where people value and look after their hearing. We help people confronting deafness, tinnitus and hearing loss to live the life they choose. We enable them to take control of their lives and remove the barriers in their way. We give people support and care, develop technology and treatments, and campaign for equality.

Our response will focus on key issues that relate to people with hearing loss and deafness. We use the term 'people with hearing loss or deafness' 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.

Our response

Question 10. The government's preferred approach is to consider the recommendations set out in Ofcom's report on accessibility for on-demand regarding the design and implementation of accessibility for on-demand; in the event that time-scales do not align with the implementation deadline of 19 September 2020 that copy-out is used to update the wording s368BC for video-on-demand of the Communications Act 2003. Do you agree with this approach?

Yes, we agree with this approach. Action on Hearing Loss supports the recommendations set out in Ofcom's report. These offer people with sensory loss better provision of access services than the provisions of the Directive and so we call on the Department to ensure that the time scales of the implementation of the Digital Economy Act align with the Directive's 19 September 2020 deadline.

Question 11. Do you agree with the government's preferred approach to ensure that the accessibility of emergency communications is made through existing provisions in Section 336 of the Communications Act?

Yes, we agree with this approach. In order for emergency communications to be accessible for people with hearing loss or deafness, they should always be subtitled and translated into British Sign Language. Further, communication via these means should be accurate. People have told us that they have missed key bits of important information through the lack of quality subtitles.

"News or weather items are important but are not always available. And sometimes the subtitles are poor or incorrect and make the information difficult to understand." Action on Hearing Loss Survey respondent

If, in exceptional circumstances, it is not possible to make the emergency communication accessible, people should be clearly signposted to where they will be able to get this information in an accessible format. We urge the government to ensure, through the legislation, that emergency communications are always accessible for people with hearing loss or deafness.