

**Review of the Statutory Requirements for the  
Provision of Subtitling, Sign Language and Audio  
Description Services on Digital Terrestrial  
Television**

**A Response by the British Deaf Association**

## **Introduction**

The British Deaf Association (BDA) welcomes the opportunity to respond to the government consultation over its Review of the Statutory Requirements for the Provision of Subtitling, Sign Language and Audio Description Services on Digital Terrestrial Television.

The BDA exists to ensure that Deaf<sup>1</sup> people who use sign language have the same rights and entitlements as any other citizens. Our vision is of a society where Deaf people have full and unrestricted access to all walks of life, contributing and participating freely. The BDA is the largest national charity run *by* Deaf people *for* Deaf people.

The BDA believes that increased provision of both subtitles and sign language on television is essential.

The BDA estimates that there are approximately 70,000 Deaf people in the UK whose first or preferred language is British Sign Language (BSL). Members of the Deaf community have different degrees of access to written English. For Deaf people whose first or preferred language is BSL, English subtitles may not be fully accessible, since English is only their second or even third language. Deaf people who are bilingual in English/BSL, may choose to access some programmes through subtitles, and other programmes through sign/spoken language interpretation.

Deaf viewers, like members of other linguistic minorities, also appreciate programmes presented directly in the language of their community. The BDA therefore believes that there is a need for more programmes presented in BSL. Deaf people signing on television are positive role models for deaf children and their parents, fostering confidence in their potential for linguistic development and achievement.

## **Background to this Response**

The BDA has, for many years, actively campaigned for signing and subtitling of programmes on television. The Association views the provisions relating to signing and subtitling in the Broadcasting Act 1996 and the associated Statutory Order as a major step forward in improving access to television broadcasting for d/Deaf and hard-of-hearing people.

The Association was actively involved in the consultation process over the *ITC Code on Subtitling, Sign Language and Audio Description* on digital terrestrial television, and continues to consult regularly with our own members, with the digital terrestrial licensees and with the ITC, over way in which broadcasters are now meeting their new statutory obligations.

This response confines itself to comment on the targets for sign language.

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<sup>1</sup> This document follows the convention of using deaf (lower-case “d”) to indicate the audiological condition of not hearing, and Deaf (upper-case “D”) to indicate those deaf people who identify culturally and linguistically as members of the sign language-using Deaf community.

## **Review of the Statutory Targets for DTT**

The comments below correspond to the numbered paragraphs in the DCMS paper.

13. *Should the targets be changed or are they about right?*

The BDA understands that, in the long-term, sign language services are likely to be increasingly delivered in a closed format. However, given the current absence of technology to transmit closed signing of an acceptable quality, the BDA takes the view that open signing is necessary to ensure even limited access to DTT for Deaf viewers. The Association would not accept a lowering of the current, modest target of 5% of programmes to be signed by the tenth anniversary of the launch of the DTT service. The Association believes that the interim targets set by the ITC are realistic and achievable, balancing the right of Deaf viewers to enjoy access to at least some programmes with the cost to broadcasters of developing and delivering these services.

*If the targets remain unchanged should there be a further review and, if so, when?*

The BDA notes that the current government review is taking place only four months after the launch of the first signing services, following the ITC's agreement that broadcasters could delay by six months the introduction of sign language services initially scheduled for November 1999. In these circumstances, it has been difficult to acquire significant consumer feedback on the new services and so to recommend any change to the current targets. The BDA believes that a further review of the targets would be useful, perhaps in November 2001, when services will have been operating for 18 months and when take-up among Deaf viewers will be more widespread.

14. The BDA is not in a position to reliably assess the current take-up of DTT services by Deaf people. However, there is no apparent reason why digital services should not eventually be taken up by the overwhelming majority of the 70,000-strong Deaf community, especially if access continues to improve.

## **Other Issues Relating to the Provision of Subtitling, Signing and Audio Description on Television**

18. *Should there be different targets for different broadcasters perhaps based on audience share of channels?*

The BDA does not believe that the current modest target of 5% of programmes signed by 2008 places an unduly heavy burden on broadcasters. We believe that the principle of access requires that all channels offer a minimum number of accessible programmes for BSL-users. In these circumstances we see no case for varying targets at present. We would be prepared to review this issue in the future, and in the light of further consumer feedback.

*Should new channels be exempt from targets or have lower targets at first?*

We do not believe that new channels should be exempt or have lower targets: this would represent a backward step from the current minimum requirements placed on all DTT programme services. Given the rapidly changing nature of broadcasting, we would be prepared to review this issue at a later date and in the light of more substantial consumer feedback.

*Which programmes or channels should be priority for subtitling, signing and audio description?*

This can only really be assessed in the light of more consumer feedback from Deaf viewers. In previous consultations, some Deaf people have indicated that they feel more strongly that news, current affairs and documentaries should be signed. However, this may be because they are already more familiar with signing on such programmes. Initial, admittedly only scant, feedback from Deaf children indicates that they are enjoying signing of cartoons (the first time such programmes have been signed). The BDA's view is that as wide a range of programmes should be signed as possible and that no programmes or channels should be exempt from the statutory requirements. Deaf people are interested in the same mix and range of programmes as hearing people. Further consultation by d/Deaf organisations and broadcasters is necessary to establish more precisely the views of Deaf viewers on the range of programmes they wish to see signed. The BDA believes that this question would be better addressed in the next review of targets for sign language on DTT services.

20. *How should equipment costs to the consumer best be met?*

The BDA recognises that there may, in the future, be some additional costs to Deaf viewers who wish to receive closed signing services - as there is for those who receive teletext subtitles. However, given the current low targets for signing, we feel that any significant costs on Deaf viewers to receive closed signing services would result in Deaf people not purchasing additional equipment, and so not benefiting from the statutory signing services. In addition, if such costs were introduced for closed signing services as a replacement for open signing, the Deaf community would rightly feel that they were being asked to start paying to receive services that they had previously received without additional cost. The BDA hopes that the necessary technology for receiving closed signing will increasingly be incorporated into digital television equipment as standard, and the government will encourage manufacturers along this route.

22. *Should cable and satellite channels be required to provide these services?*

The BDA believes that the same statutory targets for sign language services should apply to cable and satellite channels. The current situation is anomalous. Deaf people should have the right to access at least some programming on all kinds of services.

23. *Is there a need to train more subtitlers, signers and audio describers in the future; will technological developments help to combat the skills shortage?*

There is currently a chronic shortage of qualified spoken/sign language interpreters of all kinds in the UK at present. However, there are many thousands of Deaf people with excellent signing skills who could be trained to fulfil the role of signing on television. The BDA has been especially pleased by the decision of some companies specialising in the provision of sign-language services to broadcasters, to employ Deaf signers. We would encourage more companies to do the same, and believe that this route offers the best chance of addressing the current skills-shortage while also increasing employment opportunities for Deaf people. Given appropriate investment by the government in sign/spoken language interpreter training more broadly (an issue which the DfEE is addressing), the current interim targets set by the ITC should be achievable without any impact on the quality of signing. The BDA believes strongly that there must be no decline in the quality of sign language on television.

Technological developments, for example in the use of “virtual signers”, are not such that virtual signing could replace human signing in the foreseeable future. The standard of virtual signing is inadequate for complex sign language production. Virtual signing technology would only ameliorate the shortage of human signers if it were able to replace human beings in producing sign language. However, the technology for translating English to British Sign Language is unlikely to be available for many, many years (if ever) - not least because there is insufficient detailed research available on the linguistics of BSL to be able to make such translation possible - even if the technology allowed. This is a view shared by BSL linguists.

24. The BDA believes that increasing levels of access to digital services at a minimal additional cost to the viewer, is the only sure way of encouraging further take-up of such services by members of the Deaf community. In addition, Deaf people would appreciate a variety of signed programmes to be shown at different times in the schedule and not simply confined to late-night slots. Better on- and off-screen promotion of current services would be extremely welcome, and this is an issue we are addressing with broadcasters and listings publications in concert with other d/Deaf organisations.

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