

Response to the BBC consultation on Age-Related TV Licence Policy by the National Association of Deafened People

The National Association of Deafened People (NADP) is a nationwide charity run by its members who are deafened. Our members have experienced hearing loss to varying degrees during their lifetimes. Some have had a hearing loss since birth or early childhood, others may have become deafened suddenly during adulthood. Many share a gradually deteriorating hearing loss with age and have become increasingly reliant on using subtitles when viewing television broadcasts as their hearing has deteriorated. Many of our members either use hearing aids to enhance their limited hearing or have a Cochlear Implant which means they are likely to use both audio and subtitles to enjoy viewing TV. It is of no surprise that deafened people feel they should be able to enjoy content in the same manner as the hearing population but continue to feel that the quality of subtitles means that they are often unable to enjoy the same content in the same way as their hearing peers.

Hearing Loss is predominately age related. There is a greater percentage of people over 75 who have a hearing loss than other age groups. Not only does Hearing loss impact on the ability to enjoy TV but it will also impact on ability to enjoy theatre, cinema, arts in addition to social inclusion. Deafened people become more isolated as they age and as a result become more reliant on their TV to continue to enjoy quality of life and social involvement. This is evidenced by the higher proportion of TV viewed by older people.

NADP welcomes the opportunity to respond to the consultation of the Age-Related TV Licence Policy. Unfortunately, it was not clear from the consultation and background research how the needs of deafened people are being considered and as a result we felt unable to respond in the format requested in the consultation. We hope that that our response can be considered in this light and that the position of deafened people and people with a hearing loss are fully considered in any decisions made.

Statistics from Action on Hearing Loss suggests that the over 75 population are more likely to have a hearing loss than the general population. As such they are more likely to be relying on subtitles and clear audio to enjoy television programs than the general population. Currently, whilst the BBC has made significant progress to improve the quantity of subtitles, the quality remains lacking and we receive a number of complaints from our members particularly with regards the quality of live subtitles predominantly in relation to timing, accuracy and latency. Unfortunately we believe that reduced expenditure on accessibility is partly to blame and we are mindful that any further cuts in costs by the BBC could reduce further the enjoyment of TV by deafened people.

Similarly, we have had further reports of the quality of audio deteriorating such that people are finding it more difficult to comprehend what is said, particularly in entertainment programming. As such more people are becoming reliant on subtitles to better enjoy TV.

Ultimately the experience of our members suggests that deafened people are unable to enjoy TV in the same way and to the same extent as the hearing population. They therefore quite rightly question why they should pay the same licence fee. To some degree deafened people over 75 see the free TV licence as a proxy for a reduced licence fee from when they first became deafened and could no longer enjoy TV to the same extent as when they had full hearing.

However, that said NADP would not support a reduced licence fee as it believes that in paying the full fee deafened people have the right to full access. However, we believe if a reduced TV licence was available to registered deaf people then the government should compensate the BBC for this

reduction. We believe that this contribution by the government and the reduced licence fee should be ring-fenced to improve accessibility for deaf people.

Having canvassed our membership, the majority supported a means tested approach to the Age-Related Licence Policy. This would be consistent with the primary focus on poverty as the original reason to offer the free licence. Many of our members have said they personally would be prepared to pay for their licence fee. Some have indicated that it is too easy to get a free TV licence and suggested perhaps that people should opt in to receiving a free TV licence rather than opt out. Evidence of this concept to save money could be drawn from the government's Behavioural Insight Team and its experience with auto enrolment of private pension schemes, albeit the reverse mechanism.

Referring back to the questions of the consultation, firstly, we do not believe the BBC should be put in a position to be responsible for the future of the Age-Related TV Licence Policy. We recognise the extent to which the BBC has become leaner in recent years but remain concerned that vulnerable people such as deafened people will lose out if further cuts are made. We recognise the arguments made from a financial perspective for reducing the population that accesses a free licence but feel that these fail to address the needs of some of that population. We firmly believe that offering full accessibility to all content on TV would increase the audience size and effectiveness of expenditure on programming and this should have a higher focus in the improvements to the current service.

Consistent with the original aim of the current Age-Related TV Licence Policy to address poverty, NADP would support a means tested approach, although we believe the government should continue to subsidise the BBC for this political tool. However, we believe the increased revenue from over 75s should be directed towards improving accessibility of TV to help justify the payment of the full Licence Fee for the deafened population and ensure equality of access to the services funded by their TV licence.

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