

**Blind Citizens Australia**

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**Content and access:  
The future of program standards and  
captioning requirements on digital  
television multi-channels**

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## **About Blind Citizens Australia**

Blind Citizens Australia is the peak national representative organisation of and for people who are blind or vision impaired. Our mission is to achieve equity and equality by our empowerment, by promoting positive community attitudes, and by striving for high quality and accessible services which meet our needs. As the national peak body we have over 3100 individual members, 16 branches nationwide; in metropolitan, regional and rural locations and 13 affiliate organisations that represent the interests of Australians who are blind or vision impaired.

As such, it is important for Blind Citizens Australia to advocate for equality in areas of community participation and social inclusion for all Australians who are blind or vision impaired.

Blind Citizens Australia is funded by the Department of Families, Housing, Community Services and Indigenous Affairs (FaHCSIA) to provide policy advice to the Australian Government and other agencies relating to people who are blind or vision impaired.

## **Introduction**

Blind Citizens Australia finds it unacceptable that Australia's national and commercial television broadcasters continue to provide programming that does not include audio description, leaving the increasing number of Australian television viewers who are blind or vision impaired without access to one of the primary mediums for news, education, and recreation.

Audio description provides a narrative of important visual information to television viewers who are blind or vision impaired. Audio description is used to provide important information such as scenery, costuming and action in addition to reading on-screen printed information out loud.

As the number of Australians with vision impairment is predicted to double, reaching an estimated 800,000 by the year 2020, Blind Citizens Australia contends that it is unacceptable that there has been no provision for incorporating audio description services in the move to digital multi-channel broadcasting.

This ongoing exclusion of people who are blind or vision impaired is exemplified in the discussion paper, which recognises that with the move to a digital multi-channel broadcast environment "many viewers are enjoying an unprecedented level of choice when it comes to deciding what to watch on free-to-air". Unfortunately, this unprecedented level of choice does not extend to viewers who are blind or vision impaired, as currently no programming is provided with audio description.

## **Recommendations**

Blind Citizens Australia makes the following recommendations to the Department of Broadcasting, Communications and the Digital Economy, as being the minimum provision in order to provide social inclusion and equitable access for Australian television viewers who are blind or vision impaired:

- Audio description be included in the Broadcasting Services Act 1992 to the same level and extent as captioning is provided,
- all publicly funded Australian programming be fully audio described,
- all digital multi-channel broadcasters BE REQUIRED to meet their obligations under the Disability Discrimination Act 1992 before being granted additional licences to broadcast new channels and
- accessible digital set-top boxes, such as those available in the UK are made available at no extra cost, and when necessary, be government subsidised to the same extent for vulnerable persons who are blind or vision impaired.

## **Discussion**

With the proposed phase-in of the digital switchover only months away, it is imperative that both national and commercial television broadcasters be required to provide the same access to television programming for viewers who are blind or vision impaired as is provided to the rest of the population. In order to meet their obligations under the Commonwealth Disability Discrimination Act 1992, all free-to-air and subscription television broadcasters need to provide equity of access to Australians with disability to all broadcast television channels.

As the regulatory arm of the Federal government, it is unacceptable that the Australian Communications and Media Authority (ACMA) continues to allow television broadcasters to ignore the equal rights of Australians who are blind or vision impaired. The Commonwealth Disability Discrimination Act 1992 has been in effect for 17 years as a mechanism to promote and protect the rights of Australians with disability; however there has been no movement to promote or protect equity in the area of accessible television programming for Australians who are blind or vision impaired. Blind Citizens Australia believes that with the soon to be phased in switchover to digital broadcasting this inequality must end.

With all multi-channel broadcasts being required to follow programming guidelines of the Broadcasting Services Act 1992 upon the completion of the digital switchover, the Department of Broadcasting, Communications and the Digital Economy and ACMA must ensure that audio description is included in all television broadcasting in order to ameliorate this area of discrimination. Blind Citizens Australia believes that it is incumbent on the government to ensure full compliance with all Commonwealth legislation before granting licenses to broadcast organisations to rollout new business ventures that provide digital broadcast television channels.

This is particularly relevant in light of the governments recent ratification of the United Nations Convention on the rights of People with Disability (UNCPRD) and its optional protocol, as is stated in the discussion paper "...one of the key objects of the Act, which is to promote the role of broadcasting services in developing and reflecting a sense of Australian identity and character and cultural diversity". This can only be accomplished if the Broadcasting Services Act 1992 is expanded to protect and include the rights of all Australians.

In the UK audio description on all television broadcast channels is increasing. In the *Television Access Services: Third Quarter Report for 2009* from the UK Office of Communication (Ofcom), it is reported that there has been a strong use of audio description across all channels with quotas, reaching almost double the required level on average. The Uk Communications Act requires an annual increase in the amount of audio described programming from 2 percent in the first year of digital broadcast, to 10 percent or more after 5 years of digital broadcast.

While there continues to be no audio description on Australian television, Australian produced television shows, such as *Neighbours*, are routinely broadcast in the UK with audio description and captioning services.

In addition to the absence of audio described television programming, one of the major concerns Blind Citizens Australia

has in regard to the proposed digital switchover is the inaccessibility of digital televisions and the set-top boxes that will be used to convert analogue televisions to digital receivers.

Presently there are no fully accessible digital television sets on sale in Australia and the digital set-top boxes that are available are not audio enabled, which makes them inaccessible for users who are blind or vision impaired. Digital televisions and digital set-top boxes are operated via an on-screen menu. When these devices do not have accompanying audio directions, viewers who are blind, vision impaired or unable to read onscreen printed menus cannot navigate the menu independently. This is particularly egregious in light of the fact that the government is proposing a publicly funded subsidy for vulnerable communities.

Without audio enabled fully accessible digital televisions and set-top boxes, viewers who are blind or vision impaired will be unable to access television broadcasts independently when analogue broadcasts are turned off at the completion of each region's digital switchover.

## **Conclusion**

Blind Citizens Australia has made submissions to the Media Access Review 2008, the FreeTV Code of Practice 2009 and will be making a submission to the Media Access Review Access to Electronic Media for the Hearing and Vision Impaired', 2010.

Whilst we understand that change takes time, we argue that the government's proposed review of captioning and audio description in 2013 is too long to wait - and to use our accessible cinema slogan 'Its Our Turn Now' - for full and equitable access to all media. It is not acceptable that the rights of Australians who are blind or vision impaired continue to be ignored in the area of accessible free-to-air television.

We strongly believe it is necessary for the Department of Broadcasting, Communications and the Digital Economy to embrace and implement the principles of social inclusion and

immediately make provisions to the proposed digital switchover of television broadcasting so that audio description is included before the process is complete and not afterward. History tells us that it is cheaper and easier to implement full accessibility in the preparation rather than to retro-fit an already existing model.