

European Federation of Hard of Hearing People

State of subtitling access
in EU

2015 Report

Dear Reader,

Articles 11 and 14 of the EU Charter of Fundamental Rights confirm access to information and education as basic human rights. The EU has also adopted the UN Convention on the Rights of Persons with Disabilities (UNCPRD). The Convention states that its purpose is to ***promote, protect and ensure the enjoyment of all human rights*** by persons with disabilities. For those who have a hearing loss, this means promoting, protecting and ensuring access to the same information and entertainment as those who do not have a hearing loss. For this, there must be access to quality subtitling on television, 'on demand' and in the cinema.

Our vision is the full inclusion of people with hearing loss in society, which can only be achieved by providing full access to media and information. This is a ***right***. We believe that 100% of programmes broadcast on public TV channels should be subtitled by 2020.

A few years ago, we at the European Federation of Hard of Hearing People produced a report on the state of subtitling across the EU in 2011. This report brought together information on the state of subtitling across EU nations and how access to subtitling could be improved, and sought to disprove many of the myths surrounding the issue of subtitling. The 2011 report provided much needed empirical data on the considerable variability of access to subtitling between EU member states. There are stories of success. However, our research shows that many member states still have a great deal of progress to make if they are to meet the standards that are rightly demanded by the many millions of hard of hearing Europeans that continue to be denied their fundamental rights.

Three years on and it is once again our pleasure to pass on to you what we know about the state of subtitling across the European Union, and how we think it can be further improved, as undoubtedly it can. The 2011 report taught us some valuable lessons so we hope that this 2014 report will be even stronger and more useful than its predecessor. For example, this report includes vital information about the ***user experience*** of subtitling across various media, as well as the official statistics reported by national broadcasting regulators. With this information it is possible to paint a much fuller picture of the day-to-day experiences of those with a hearing loss across the EU.

With this updated report we have also tried to update the discourse surrounding subtitling so as to keep it in line with current trends in audiovisual media. This means ensuring that progress is made not only within public broadcasting on television, but also with private broadcasters and, crucially for the increasingly computer-literate societies of the European Union, popular internet-based 'on demand' services. Those Europeans that have a hearing loss must have ***access to the same goods and services*** as everyone else if the EU is to claim that it promotes, protects and ensures the enjoyment of all human rights by persons with disabilities. Article 30 of UNCPRD recognises the right of persons with disabilities to have ***equal access to participation in cultural life, recreation, leisure*** and sport.

As ever the stories of success and reasons for celebration are matched by areas of concern and the enduring frustration of the many millions of Europeans who continue to be unjustly excluded from society. For example, there are significant gaps between the service available by different 'on demand' providers. Netflix has good coverage, whilst Amazon Instant offers

no subtitling with its online content. The same is true for EU member states. Some continue to make strides in the right direction, whilst others still lag behind, marginalising the ever-growing populations of people who have a hearing loss within their countries. These discrepancies are *unacceptable* and we hope that the information available in this report can help national organisations to intensify the pressure on broadcasting and media organisations to come in to line with what is rightly demanded of them under human rights law.

EFHOH is keen to work together with organisations across the EU in order to guarantee the fundamentally important human right that is access to information and participation in the cultural life of society.

Ed Spragg | Policy Officer | European Federation of Hard of Hearing People

Who are we?

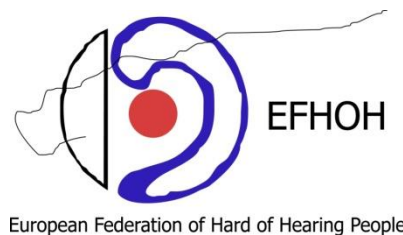
EFHOH – European Federation of Hard of Hearing People

The European Federation of Hard of Hearing People exists to represent the rights of people who have a hearing loss at the European level, within European politics, the institutions of the European Union, in dialogue with the member states of the European Parliament, and any other European authorities.

We campaign for equal rights for people with a hearing loss, and our vision is the full inclusion of those who experience hearing loss in society. This vision has always included the issue of subtitling. However, with the growing range of media available today, the importance of subtitling is greater than ever.

The board members of EFHOH carry out their work on a purely voluntary basis and our membership consists of many groups who experience hearing loss, including their friends and families. These include:

- The hard of hearing
- Deafened people
- People with hearing implants (CI)
- Meniere's sufferers
- Tinnitus sufferers



European Federation of Hard of Hearing People

All use speech, lipreading, and the written word as their main forms of communication.

If you would like to know more about our work, please visit our website:

www.efhoh.org

What does “hard of hearing” mean?

There are 51 million people in the European Union to whom the term “hard of hearing” applies.

The term is used as a definition for all people who experience hearing loss, ranging from light hearing loss to adult, profoundly deafened people. Unlike pre-lingual deaf people, hard of hearing people develop and use the spoken language (with or without supportive sign).

Hard of hearing people and late-deafened people rely on visual text to ensure that they are able to access the ever increasing range of information available in the world on an equal basis with their hearing peers.

The most commonly used visual text is, of course, subtitles.

The Information Society

An information society is any society in which the creation, distribution, use, integration and manipulation of information is a significant economic, political, and cultural activity.

It is fair to say, with the widespread proliferation of the internet, that this statement would be true of most countries in the world. Yet it is most certainly true of states within the European Union. As such, access to things like television, online broadcasting, films and the like cannot be considered an issue of



luxury and choice; access to these economic, political, and cultural media is a right.

In 2003, Viviane Reding, the EU Commissioner for Justice, Fundamental Rights and Citizenship, made these comments on the central societal role of broadcasting:

“Information, democratic dialogue and cultural and social values. These words reveal the importance of broadcasting in our societies. It is not simply an industry like any other”

Today, our Information Societies rely on broadcasting not only for entertainment, but for our culture, our politics. We would go so far as to say that in our Information Societies broadcasting is even a central pillar in our democracy.



Subtitling: Our Door To The Information Society

What are subtitles?

How do they help us?

How do they help others?

Subtitling is the process of displaying text on a television, video screen or other visual display to provide additional or interpretive information to individuals who wish to access it. Closed captions typically show a transcription of the audio portion of a program as it occurs (either verbatim or in edited form), sometimes including non-speech elements.

Subtitles can be open (imposed on screen for everyone to see), or closed (hidden, available on demand by the viewer). Subtitles are used on TV, online, on DVD, in cinemas and the theatre.

Good quality subtitling has the power to:

- Benefit everyone with hearing loss including elderly people
- Improve reading levels in children
- Help deaf children to access spoken language
- Improve language understanding for those learning and speaking foreign languages
- Benefit bilingual sign and spoken language users
- Remove social barriers

Although same-language subtitling is generally produced for the benefit of the hard of hearing community, many people who are not hard of hearing choose to use them anyway.

This is often done because the use of closed captioning or subtitles ensures that not a single word of dialogue is missed.

Additionally, captions and subtitles can reveal information that would be otherwise difficult to pick up. This may apply to picking up song lyrics, softly spoken dialogue or dialogue spoken by those with unfamiliar accents, or supportive minor dialogue from background characters.

Myths About Subtitling

Let's debunk some of the worst myths about subtitling:

Subtitling is expensive

The Myth: Getting accurate subtitles simply raises the cost of production too high to be universally justifiable.

The Reality: This is a common misconception with absolutely no grounding in fact! The reality is that subtitles cost less than 1% of the overall production cost of programming. This is partly due to the fact that there are no copyright obligations involved.

Subtitling is difficult in practice

The Myth: So it may not be expensive. But it is still a slow and laborious process, right?

The Reality: Software is improving all the time and current developments in “respeaking” technology allows for accurate subtitling to be achieved through voice recognition. This process is much quicker and easier than typing. Simply, the technology is there to make subtitling easy, but importantly fast and accurate at the same time.

It is cheaper to dub than subtitle



The Myth: Why subtitle a foreign movie when it is infinitely cheaper to have the whole thing dubbed over?

The Reality: This myth results in many foreign films or programmes that could be subtitled being dubbed instead. Not only does it destroy the original fluency of the film or TV show but it is also a false economy. Unlike subtitles, dubbing is subject to copyright laws, on top of the fees that studios must pay out for voice actors.

It's not worth it

The Myth: Even if all of the above is true, why bother subtitling if not that many people really use it?

The Reality: Beyond issues of rights and legislation it simply makes economic sense for broadcasters to subtitle their programming. In Netherlands, 5.4 million people out of a population of 17 million state that they rely on subtitling. 67% of these people would change channel when there is no subtitling. From a business standpoint it would be foolish to ignore such a weighty statistic.

Our Vision

By 2020, we want to see subtitling on 100% of programmes broadcast on public channels across the EU, with simple technical standards and consumer-friendly rules.

We expect the same rules to apply to popular 'On Demand' services so that hard of hearing people are not continually denied access to these services.

We want to see more subtitling in cinemas and in the theatre.

From Vision to Realisation

In our mission to open up access to the whole range of visual media available in our societies we have a number of vital tools at our disposal. These include:

- United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)
- Audio-Visual Media Services Directive (AVMSD)
- European Disability Strategy 2010 – 2020

What we are asking for European Institutions to ensure the realisation of rights and recommendations that are contained within these documents.

The UNCRPD requires that states promote, protect and ensure the full enjoyment of human rights by persons with disabilities and ensure that they enjoy full equality under the law. Amongst its guiding principles are full and effective participation and inclusion in society, equality of opportunity, and accessibility.

The AVMSD is an internal market instrument that covers the right to provide audiovisual services, the right to freedom of expression and information, and the protection public interest, including non-discrimination. It covers traditional analogue and digital television as well as more recent on-demand services. Non-discrimination must include equal access to services.

The European Disability Strategy states that European Institutions must ensure accessibility to goods, services, including public services and assistance devices for people with disabilities. It also stresses that they must optimise use of EU funding instruments for accessibility and non-discrimination and increase visibility of disability-relevant funding possibilities in post-2013 programmes.

In respect to specific need of deaf and hard of hearing people for more subtitling, this would in practice mean:

- Ensuring availability of EU funding for public broadcasters to facilitate acquiring technical equipment necessary to introduce subtitling and training their staff.
- Introducing EU-wide standards based on recent research published by DTV4ALL and good practice of countries which already achieved very high standards.
- Assessing the possibility of reviewing AVMSD in order to introduce a legally binding obligation for member states to set up targets for subtitling of a certain proportion of their programmes, with ultimate target being subtitling of 100% programs in public TV.
- Alternatively, promote a stakeholders dialogue on this issue

Subtitling on TV

Hard of hearing and deafened people are able to access the television via remote control by choosing the teletext page or in case of digital TV by choosing “*subtitles*” option.

This form of access is simple and inexpensive. All Media providers should ensure that people who are hard of hearing and those who provide television in public places have clear instruction on how subtitling should be accessed.

In our societies television is an incredibly important media outlet. We watch TV for entertainment, to relax, to socialise with our friends and families. However, broadcast television is today much more than simply a source of leisure; it is a source of information. Broadcast television provides us with a wealth of social, cultural, educational, and political information that informs the interactions we have and the decisions that we make in our daily lives.



This is why the accessibility of television, through subtitling and closed captions, must be of the highest priority when considering the rights hard of hearing people. It is essential for the fulfilment of individual rights but also for the fulfilment of the duties of any democratic state. How can we expect voters to make equally well-informed

political decisions if they do not have equal access to the political information available?

Subtitling is also beneficial for people who are not hard of hearing.

General Trends

The overall trend since our last report in 2011 is a positive one. Most countries for which we have data for 2011 and 2013 have demonstrably improved their subtitling provision across this time period. However, as will be seen throughout this report, some countries are clearly leading the way, whilst others have a great deal of room for improvement.

A more worrying general trend is that it is clear that much more needs to be done in terms of data collection. As can be seen in the graphs later in the paper, there are significant gaps in the data available to us. This makes general statements more difficult to make. Nevertheless, consider some of the relative success stories, and those countries that need to make some fast and effective changes,

The Good

Countries such as the **UK, Netherlands, Sweden, Belgium (Flanders) and France** all report amongst the highest levels of subtitling provision, particularly for publically funded channels. Netherlands, Sweden and France have made significant progress since the last report whilst the UK and Belgium (Flanders) have maintained and improved upon what were already very high levels back in 2011.

It must be emphasised that the job is not finished for the countries. They must look to the future to ensure that the rights of those with hearing loss are met fully and consistently.

Improving

Czech Republic, Austria, Slovenia, Finland, Denmark, Spain – all of these countries have made some progress since 2011 when it comes to subtitling provision. However on average these countries fall well below the levels being achieved in the forerunners mentioned above. In Denmark the accuracy of live subtitling is often poor. In Finland, as will be discussed further, subtitling obligations are only met with the inclusion of on demand services.

These countries should be commended for the improvements they have made but must not now rest of their laurels. The ultimate goal should be reaching the 100% mark.

The Bad

Countries such as **Germany, Slovakia, and Poland** all report some level of subtitling but nowhere near enough. We are particularly disappointed in the case of Germany. Considering the position of Germany within the European Union it should certainly be doing a better job at protecting the rights of its hard of hearing citizens.

Of course there are many countries that are not specifically mentioned here. This is because, in many cases, we were unable to obtain data for them prior to this report. It is possible that some of the countries may have improved on subtitling a great deal, but if we do not hear about it then we cannot report it.

The Public – Private Gap

It is important to mention that across most member states where data was available for both public and privately funded broadcasters, that private broadcasters provision of subtitling was significantly lower than public broadcasters.

It is also important to note that the countries in which this was not the case were the countries that also have the most clear and effective regulations and guidance. This is an area, it seems, that requires further investigation and probably legislation.

Subtitling "On Demand"

The world of visual entertainment is no longer dominated by traditional broadcast television. Increasingly today we find ourselves spending more time watching television



shows and movies online, through “On Demand” services. Netflix, Amazon Instant Video, LoveFilm – all are taking an ever larger share of the broadcasting market, but this begs the question of whether these services are making themselves accessible to the hard of hearing population.

Getting an answer to this question is not entirely simple, and there are certain hurdles to producing an accurate picture of the current state of “On Demand” subtitling. First of all there, is a lack of any clear regulations guaranteeing the accessibility of these services. As such data is much less readily available than it would be if the field was properly regulated. One reason for this is that “On Demand” is a very recent trend in media consumption and it is taking regulators time to catch-up with the speed at which it is expanding. As is fairly common with the issue of subtitling, some countries and organisations are much better at reporting on their behaviour than others so, again, it must be stressed that the data available for this report is not as complete as it ideally would be.

However, with the above comments in mind, consider what information we do have.

The Good

A lack of clear and specific regulations could have left broadcasters and service providers making no provision at all for those who require subtitles. Thankfully this has not been the case. Here are some of the success stories.

BBC iPlayer: This online catch-up service provides subtitling for 98% of all of its available programming. It is important to note that this has been undertaken voluntarily, without the presence of specific directives guiding the provision of subtitling.

Uitzending Gemist: The Dutch national online catch-up provider delivers subtitling on 97% of its online broadcasts.

Of course ultimately we would want all broadcasters to provide 100% subtitling coverage for their online services, but we, and our members are very pleased with the figures reported by these service providers.

Should do better

A number of providers have done some good work with regards to online subtitling but still have a considerable way to go if there are to fully appreciate the rights of the hard of hearing community.

Netflix: Netflix makes very good provision of subtitles, but unfortunately only for certain languages. We would like Netflix to ensure that they do not exclude people from their services on the basis of nationality as well as hearing loss.

Finland: Finland reports a very good overall level of subtitling, however the figure is measured across traditional broadcast and on demand services. When these two categories are separated the individual numbers become much lower, around the 50% mark. Although the overall subtitling coverage in Finland across broadcast and on-demand is around 86%, these figures should be counted separately so as to ensure equality of access to both of these media.

Dr.Dk: In Denmark, some new internal legislative agreements have led to an increase in online subtitling provision from the main national broadcaster. However, significant progress still needs to be made.

Sweden: It has been reported by our members that on-demand services are subtitled in “a lot, but not all” cases. Unfortunately there is not specific data being collected that can provide a more accurate picture of the state of online subtitling in Sweden. We would urge Swedish regulators to gather such data.

The Bad

Other providers seem to be making no effort whatsoever to recognise the demands of those who require subtitles to enjoy the same programming as their peers. This is unacceptable and proper legislation and regulation is required so that these providers are not allowed to continue to lag behind.

Sky: It is reported that 96% of Sky’s online content is without subtitles in the UK. For such a large, wealthy, and popular service provider this is clearly unacceptable.

Amazon Instant Video: In 2013 Amazon provided no subtitling for its Instant Video service. Once again, we must stress that this is completely unacceptable, and contrary to the rights of hard of hearing consumers. We understand Amazon will be introducing subtitling in 2015.

Everyone else: This leaves everyone else. If the rights of those with a hearing loss are to be met then all but a select few providers have a lot of progress to make when it comes to the provision of subtitling with on-demand services.

Subtitling in the Cinema

We made it clear in our previous report that the rights of hard of hearing people should equally be upheld when it comes to watching films or other events in the cinema. For non-native language films this is broadly the case, as these are routinely subtitled anyway. However, hard of hearing people have the right to be able to access the same goods, services, and leisure activities as their hearing peers but, when it comes to the cinema, this has not historically been the case. By and large, native films are not given the same subtitling treatment as non-native cinema.



At the time of our last report the information that we had pointed towards a highly limited provision of subtitles in cinemas, with being restricted to specific times and days in the week when they can attend accessible screenings of the latest blockbusters and other releases. We of course found this to be unacceptable.

Disappointingly, the initial signs for 2014 are that little progress has been made in this area. Hearing loss-accessible screenings often remain limited to early weekend mornings or weekday afternoons, excluding much of the employed hard of hearing population. This is currently the situation in France, one of the leading countries when it comes to the provision of televised subtitles.

There are also frequently significant delays between the general release of a new film and the same film being available for viewing with the country-specific subtitles. This is the case, for example, in Denmark.



Unfortunately these far from satisfactory reports do not represent the worst states of affairs when it comes to subtitling in cinemas. Many of our members are reporting very low levels of subtitling, if not no subtitling at all, especially when it comes to subtitling in the native language or of native language productions. The Netherlands reports that a resounding 0% of cinema is available with subtitles. This is also the case for Finland. Slovenia reports that no

native films are available with subtitling. In Poland we are told that subtitling “*happens, but is very rare*”. In France, although it is routine for foreign films to be subtitled, “*very few*” French language films are accessible to the hard of hearing.

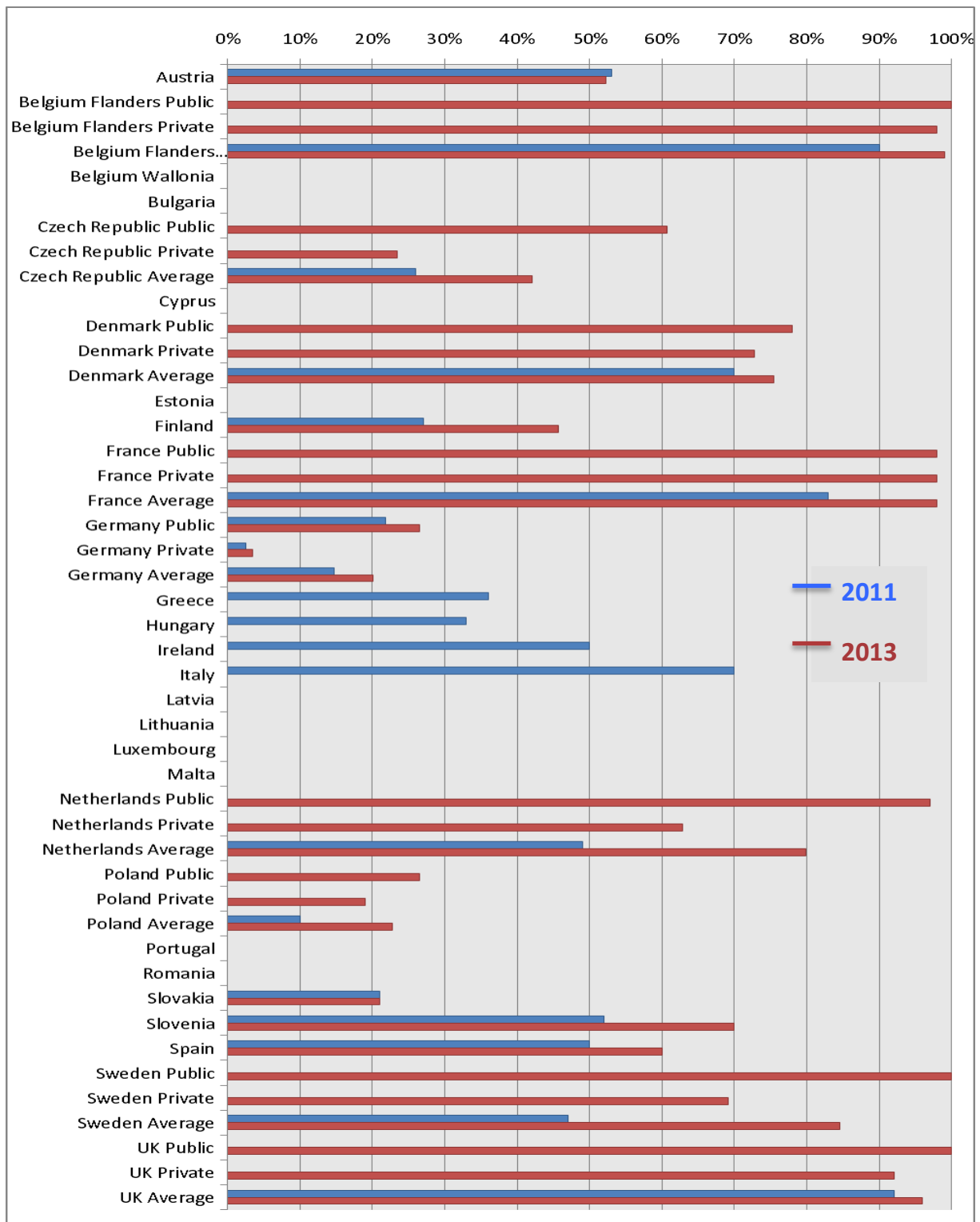


There are countries, such as the UK and Sweden, in which subtitling in the cinema is becoming increasingly frequent, available at broadly accessible times, and available for the newest releases. However, these countries are certainly the exception and not the norm.

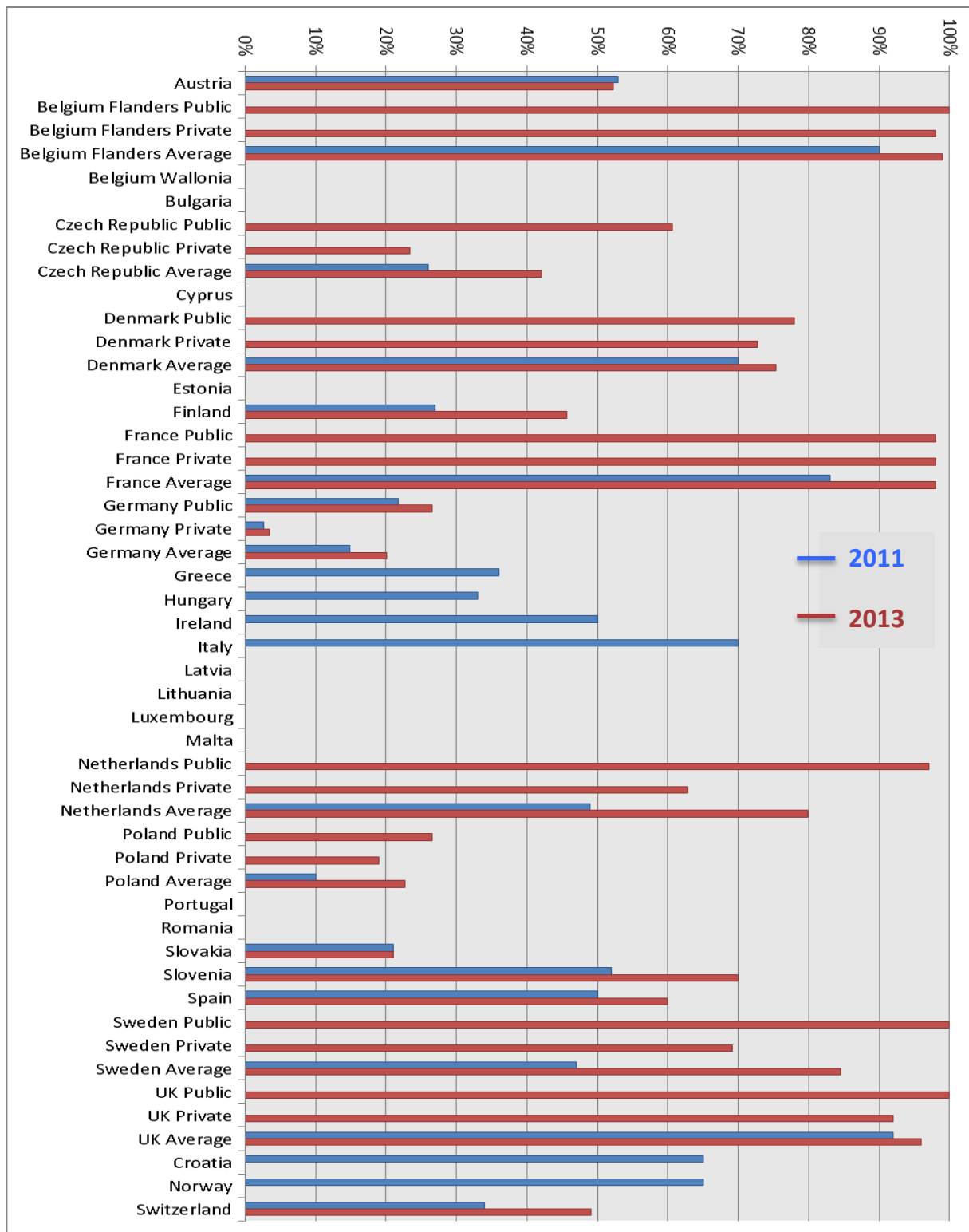
We cannot stress strongly enough the need for cinemas, film organisations and state legislators to follow the example of these few countries and make cinemas accessible to those in society with a hearing loss. This equal accessibility is a right, not simply a want.

The Data

Below you will find the data that was made available to us regarding subtitling provision for broadcast television. In **blue** you will see data from 2011 and in **red** you will see the level of subtitling provision that was reached by 2013. Where possible the data has been divided between public and private broadcasters, with a national average provided alongside. Please note that percentages are for illustration purposes only



Our primary focus for this report is subtitling in the EU, however we do have some data available for non-EU member states. Below is the data comparison for all states for which we have data, including those not currently members of the EU. Once again, in **blue** you will see data from 2011 and in **red** you will see the level of subtitling provision that was reached by 2013. Where possible the data has been divided between public and private broadcasters, with a national average provided alongside.



How we Collected Data

Many TV companies provide data openly, making data very easy to find. Data on some broadcasters is gathered by official regulators, such as OFCOM that covers the UK and some broadcasters from other countries, or the EUB (European Union of Broadcasters) that covers much of Europe. However, when neither of these two arrangements is in place data can be quite difficult to gather. As can be seen in the graph above, not all Member States were able to provide data on subtitling provision in their countries. This is due in some cases to a lack of appropriate mechanisms, or simply because no subtitling provision is made at all.

Methods

Our data has been gathered from a mix of broadcasters, official regulators, and from deaf and hard of hearing stakeholder organisations. There is no universal standard for gathering subtitling information. Below are some examples of how methods differ.

Countries like **the UK** and **Netherlands** provide information based on a 24-hour period of broadcasting. This means that, for example, if the UK reported 100% subtitling then this would translate to full 24 hour subtitling coverage.

Other broadcasters do not use a 24 hour time period when calculating percentage of subtitling coverage. For example, **Hungary, Poland and Ireland** operate with an 18 or 19 hour time period between 6am – 12/1am.

In **Finland** national quotas for subtitling can consist of 33% on-demand programming. This means that whilst the Finnish Broadcasting Company (YLE) reports 86% subtitling coverage, only 57.3% of its broadcast television is subtitled. The rest is constituted by on-demand subtitling coverage.

In **Slovenia** calculations are made including all foreign language as well as native language programming. Slovenia is able to report 70% subtitling provision on its two primary public channels, but it has been reported by stakeholder organisations that only 20% of actual Slovenian language programming is subtitled.

Limitations

These differences in method make comparisons more complicated. Of course if Hungary was to report 100% subtitling provision, this would translate to only 18 hours compared to the 24 hours available in the UK.

Furthermore, differences in what makes up calculations of subtitling coverage mean that the reality for the deaf or hard of hearing viewer does not necessarily reflect the statistics presented by the broadcasters.

What we Need in the Future

We believe that the reason for such discrepancies in method of data collection and in overall provision of subtitling across the EU is a lack of Communication Acts that incorporate obligations regarding access to subtitling. We have found that countries with good laws and effective enforcement are also the countries that have the highest levels of subtitling provision, and make the most progress in terms of extending this provision further.

Good Practice

OFCOM and the UK offer one of the best examples of good practice that we suggest should be replicated in other member states.

1. Calculations are made based on 24 hour broadcasting period i.e. the actual broadcasting time frame
2. Any broadcaster with an audience share over 0.05% is regulated
3. The affordability of subtitling is based on a 1% of annual turnover
4. Subtitling targets are continually raised, even when these targets are already achieved in advance
5. There are clear guidelines and guidance on what should be counted, and how this should be done.

This good practice contrasts starkly with what we would consider to be poor practice in other member states. A Media Directive in effect from July 2011 in Poland simply requires a minimum of 10% accessibility for sign language, audio-description and subtitles. There is no separation of the requirements or guidance on what should be counted or how this should be done.

Czech Republic directives do separate between subtitling (70%), sign language (2%), and audio-description (10%) but, as with Poland, there is no clear guidance on what should be counted and how this should be done. This lack of guidance has resulted in Czech broadcasters reporting the display of the score and time of a football match along with the provision of subtitles. Clearly this is unacceptable.



Accessibility

Subtitling is in essence all about accessibility, so it is crucial that when they are being provided that subtitles themselves are accessible to those who rely on them.

The accessibility of subtitles is dependent on a number of factors. The primary factor is that of quality. It is all well and good having subtitles, but if they are not accurate then they are of little or no use to the consumer. This is a particular problem with regards to live subtitling. Despite being ahead of the rest of the field in many ways, our members are reporting that in the UK quantity of subtitles is sometimes being put above quality. We know that this is also the case in many other member states. It is essential that quality is maintained alongside increasing quantity; otherwise the purpose of subtitling is lost.

One way to ensure quality is maintained is to invest in the training of live subtitling translators and speech-to-text interpreters. Such investment will only increase the accessibility of subtitling.

Another crucial factor is the time at which subtitles are available on programming. Even though some member states are making progress with regards to the percentage of broadcast hours covered by subtitles, often these subtitles are only available on programmes late at night or at generally unsociable times. Providing subtitles in this way undermines the purpose of subtitles in the first place; to make audiovisual media equally accessible to all, regardless of hearing loss.

Effective Legislation

It is also essential that effective legislation be produced at both the EU and national levels that ensures access to subtitling as a fundamental feature of broadcasting. The AVMSD should be reviewed and revised so as to introduce legally binding targets on broadcasters to provide subtitling on a certain proportion of their programming.

It is clear from our research and the evidence available to us that those countries with the most direct legislation and effective guidance are also the countries that consistently exhibit the best practices with regards to subtitling.

The UK communications regulator OFCOM took the decision to extend the directives of the AVMSD to all of those broadcasters, both domestic and international, that fall under its remit. As such OFCOM has been able to gather data and exert pressure on a much wider range of broadcasters, ultimately leading to increased subtitling provision.

Although it is beyond the immediate scope of this report, American communications regulator, the FCC, introduced a clear guide, including specific deadlines for service providers, as to how online video content should be subtitled. This included clear guidelines

as to what should be counted as subtitles, as well as a simple process through which consumers could file complaints about the service they received.

More EU member states should follow the examples set by these regulators

Independent Development

However, legislation should ideally be a last resort. There is nothing holding broadcasters back from exercising corporate responsibility when it comes to subtitling. Indeed, it would be commercially very valuable for them to do so. At least 1 in 10 EU citizens has a hearing loss and as such will likely rely on subtitling at one time or another. This is a significant market.

UK public broadcaster the BBC did not wait for legislation to proliferate subtitles in its broadcasting, both on television and online. The BBC took it upon itself to lead the way with online subtitling provision, as well as being exemplary with regards to televised subtitles. This was undertaken above and beyond the requirements of any legislation.

In order to realise the rights of the growing number of hard of hearing people across the European Union broadcasters should follow the examples of good practice and learn from the mistakes of poor practice that have been outlined in this paper. We must not wait. Action must be taken now.