

CfID's Submission into ACMA's draft
*Broadcasting Services (Television
Captioning) Standard 2023*

January 2024

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About Centre for Inclusive Design

Centre for Inclusive Design is a centre of excellence for inclusive design in Australia. Our network of industry experts and global partners brings innovation and global best practice ID so everyone has the opportunity to connect and be a part of our society. CfID delivers innovation and insight, events and partnerships and a practice that helps people reach you. We build inclusive platforms to create more value for industry, government and most importantly meaningful connection for and with the people who are marginalised.

Centre for Inclusive Design, formerly Media Access Australia (MAA), has a rich history in the traditional disability sector both advocating and providing solutions for over 35 years. MAA was formed out of the Australian Caption Centre (ACC), a not-for-profit organisation founded in 1982. The ACC aimed to promote and produce captioning for deaf or hearing impaired Australians. In 2005, the ACC sold its commercial operations including the captioning services, and formed Media Access Australia.

As MAA, the focus broadened to those disadvantaged in access to media. In the digital age, the role of media and communication grew to include accessibility across digital communication as well as traditional communication. MAA focused strongly on advocating and providing digital accessibility for Australia in websites, documents and videos. As the role of technology in our lives has grown, MAA realised they needed to tackle design issues in the conception stage and thus created the Centre for Inclusive Design.

CfID Feedback on ACMA's new draft captioning guidelines

The issue of caption quality, how to define it, and the setting of clear standards which broadcasters (and their caption suppliers) are expected to meet has been a matter of discussion since closed captioning began on Australian television in the early 1980s. Viewers who rely on captions to access TV programs are entitled to expect that they are of the highest quality, accurately conveying speech and other elements such as music and sound effects.

Caption quality became a more pressing and contentious issue with the introduction of captioning on news bulletins and other live or near-live programs. The captions for these programs are created by captioners as they go to air, using a number of

different methods. Live captions inevitably involve a degree of latency (i.e. their appearance on the screen lags behind the audio), and are much more liable to include spelling mistakes, mishearings and other errors.

The Broadcasting Services Act's Captioning Standard requires captions to be readable, accurate and comprehensible. Exactly how these requirements are to be measured will always be a matter for discussion, and the seriousness of any particular error can vary greatly.

However, we believe that the ACMA's draft *Broadcasting Services (Television Captioning) Standard 2023 – Captioning quality guidelines* provides a very good explanation of how the ACMA determines whether captions meet these requirements. The detailed examples it gives of how specific complaints have been dealt with, and the reasoning behind finding whether the captions have been in breach of the Standard or not, should help consumers understand how the ACMA makes decisions in these cases.

In summary, CfID finds these guidelines to be clearly written and useful, and we have no hesitation in endorsing them.