



# **Access to Internet for Persons with Disabilities and Specific Needs**

For ITU – WCG (Resolution 1344)

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## EXECUTIVE SUMMARY

For deaf and hard of hearing people, captioning is equal to the audio component. This is an aspiration and work must be done to realise that aspiration, as captioning is central to deaf and hard of hearing people's access to media content – in the same way as sound is for non-deaf people.

Despite the best intention of the providers, captions on websites are often an afterthought and deaf and hard of hearing individuals will have to contend with either substandard captions or no captions at all.

For deaf and hard of hearing people, our capacity to gain information from wide ranging public resources is extremely limited and it is imperative that our capacity to access information is adequate and of high standard.

Deaf and hard of hearing people, at times, are forced to make complaints through Disability Discrimination Act (Commonwealth, 1991) for providers to caption their content. However these complaints often are dismissed because of existing processes adopted by the governmental and non-governmental organisations and their adoption/ compliance to WCAG 2.0.

In addition to the Act, the providers may be exempted from providing accessible services if they can demonstrate financial hardship, which means that information will be not accessible for deaf and hard of hearing people.

Australian Government created a 'whole-of-government' agency – Digital Transformation Office ([www.dto.gov.au](http://www.dto.gov.au)) that is responsible for whole-government web advice and its accessibility.

Access to information is not an unreasonable accommodation and providers need an explicitly clear direction and standard in best practice in delivery of website accessibility.

For purpose of this submission, we will focus on specific references from WCAG 2.0.

- 1.2.2 (A) Captions are provided for all pre-recorded audio content in synchronised media, except when the media is a media alternative for text and is clearly labelled as such.
- 1.2.4 (AA) Captions are provided for all live audio content in synchronised media.
- 1.2.6 (AAA) Sign language interpretation is provided for all pre-recorded audio content in synchronised media.

Reference: <http://www.w3.org/WAI/WCAG20/quickref/> (accessed – 5 January 2016).

## Caption (WCAG 2.0 A and AA)

Many videos on websites may be accessible and there are many more that are not.

### Video Protocols:

There are primarily two types of video protocols: **Open sourced** and **close sourced**. Open sourced are commonly available on website, such as YouTube, Vimeo and others. Close sourced are purchased or privately developed film/ editing tools commonly used by media or communication industry and are not shared openly.

Open sourced video protocol such as YouTube or Vimeo are widely used and are publicly accessible to everyone.

Close sourced videos are only available to subscribers, such as Fairfax Media (a major media outlet in Australia).

Netflix (using their own close sourced protocol) have **all** their videos captioned as a result of a lawsuit from the National Association of the Deaf under the American with Discrimination Act (ADA). Same cannot be said from other providers (Stan, Presto and etc). These providers are commonly known as 'Video on Demand'.

### Types of Videos:

There are two types of videos: **Official** videos and **non-official** videos.

Official videos are produced for purpose of education, information and/ or promotion.

Non-official videos are produced where community-at-large just simply take unscheduled and unplanned videos and upload onto social media network and are often unedited.

For purpose of this submission, we will focus on **Official videos**.

Official videos are produced in advance are scheduled, planned and edited. However, these videos are often not captioned in advance and rely on open sourced protocol to enable its content to be captioned.

Open sourced protocol uses 'voice to text' capability using voice recognition tool to translate spoken words in text. The voice recognition tool is not optimised and the captions on these videos are incorrectly translated and grammatically incorrect. This leads to confusion as to what the speaker or the video is presenting, and at times, videos are horribly translated and make no sense at all.

News outlets upload their videos in YouTube. Many of these videos were broadcasted on TV with closed captions (as required by the Australian Broadcasting Service Act), however the captions are not uploaded with the video. Instead, it relies on the voice recognition system provided by the video protocol.

Examples of News Grabs:

- <https://www.youtube.com/watch?v=5WfCz0Vx4z8>
- <https://www.youtube.com/watch?v=Vo62Ai7aVzk>
- <https://www.youtube.com/watch?v=haWEUArEdKY>
- <https://www.youtube.com/watch?v=oGd168gv4hE>

The majority of the privately sourced protocols are not caption enabled or have voice recognition tools to generate captions.

These videos would have to be captioned manually and is available for everyone (see <https://youtu.be/0AsZ6DbOmlo> as an example).

The quality of captioning varies between both protocols and commitment by providers to ensure their content is appropriately captioned. The WCAG 2.0 does not specify how captions must be accurate, timely and are grammatically correct, and an excuse often used by providers is to say that 'Our videos are in YouTube (or in other protocol) and you should click on the 'caption' button to see captions'.

When arguing that captions are not correct, they simply refer to WCAG 2.0 and said they have conformed to that standard.

Furthermore, open sourced video protocols are designed, developed and maintained in other country and therefore is outside Australia's jurisdiction.

Unfortunately, the standards (WCAG 2.0) have no reference to quality of captions for both protocol and types of videos.

**Recommendations:**

1. That WCAG 2.0 to develop minimum captioning standards for purpose of using videos on websites, the minimum captioning standards must be explicitly clear on accuracy and time-coded (for example, for pre-recorded videos, it is expected that captions to be 100% accurate and is grammatically correct).
2. That WCAG 2.0 have clear distinction between official and non-official videos;
3. That WCAG 2.0 (A) be removed as minimum standards by 2020 and (AA) as absolute minimum;
4. That Governments and NGOs that upload official videos are uploaded with better quality video protocol that is distinct from mainstreamed open-sourced protocols, or alternatively;
5. That providers caption their videos in the editing process so that their videos are fully accessible when uploaded.

### **Sign language interpretation (WCAG 2.0 – AAA):**

Sign language interpretation requires a high level skill to enable appropriate translation of spoken language into sign language (or vice versa).

When creating these videos, we find that these videos undertake additional processes in developing the videos such as planning, filming and editing.

However, under the current interpretation of WCAG 2.0 (AAA), there is no reference to best practice in delivering this standard in terms of accessibility.

Many organisations (both government and NGOs) have developed videos for sign language users to ensure they are meeting their goals in achieving accessible content on their websites. Despite their best intentions, many of these videos are poorly translated and /or video contains sign language only (e.g. directly translating written scripts). The signer/s may not be a suitably qualified interpreter or does not possess sufficient knowledge and skills as a translator.

Sign language is a language in its own right. Like any spoken languages, sign language has own grammatical structure, syntax, hand shapes and locations. Sign language also relies on visual cues such as body language, facial expressions and placement of signs (similar to use of vocal tones when speaking).

For these reasons, Deaf Australia has developed Auslan Translation Endorsement System that recognise translation providers to translate spoken language to sign language in an official capacity.

DeafConnectED undertook a project 2013 to develop a practical guide for Sign Language Translation on websites, titled *'What Standards? The need for evident-based Auslan Translation standards and production guidelines'* ([http://accan.org.au/files/Grants/ACCAN\\_AuslanTranslationProject\\_FullReport-web.pdf](http://accan.org.au/files/Grants/ACCAN_AuslanTranslationProject_FullReport-web.pdf)). This guide addresses the needs for appropriate level of skills and qualifications to ensure high quality sign language interpretation or translation on websites.

Our challenge is that many of the producers do not see the need for this 'endorsement' system and many sign language providers do not see the need to have their services as authorised providers as there are no such requirements in the WCAG.

It would be necessary to include in the guidelines to ensure that contents are translated in the best interest of sign language users. In addition, the UN Convention on the Rights of Persons with Disability includes the use of sign language (Articles 9 (e), 21 (b) and 30.4).

#### **Recommendations:**

6. That WCAG 2.0 to adopt practical guide for sign language interpretation/ translation developed by DeafConnectED as a minimum standard, and;
7. That consumer-based organisations (eg, National Disabled People Organisation) are authorised endorsers of translator services, so;
8. That endorsed sign language translation services can undertake tasks that will meet the requirements of WCAG 2.0 (AAA) standards.