

Ensuring the quality of TV and on-demand access services

Consultation on proposed modifications to the TV Access Services Code and updates to Ofcom's best practice guidelines on access services

CONSULTATION:

Publication date: 13 July 2023

Closing date for responses: 21 September 2023

Contents

Section

1. Overview	1
2. Background and our proposed approach	4
3. Changes to the TV Access Services Code	8
4. Overarching guidelines	10
5. Subtitling guidelines	223
6. Audio Description Guidelines	28
7. Signing Guidelines	32

Annex

A1: Summary of proposed changes to the subtitling, audio description and signing guidelines	37
A2. Equality Impact Assessment	55
A3. Proposed list of external sources	57
A4. Responding to this consultation	58
A5. Ofcom's consultation principles	62
A6. Consultation coversheet	63
A7. Consultation questions	64

1. Overview

Ofcom believes that TV and video-on-demand programming should provide an equally fulfilling experience for all audiences, regardless of disability. This relies not only on widening availability of access services (including subtitling, audio description and signing), but also on improving their quality and usability.

Developments in the video-on-demand industry (such as increased customisation options) and growth of new technologies (including automatic subtitling and synthetic voices for audio description) have brought about a greater range of approaches to accessibility features. So, we want to hear your views on what really matters in ensuring the quality of these services.

Background

Ofcom's TV access services code sets out how broadcasters should meet their legal obligations to provide access services (subtitling, AD and signing) on a proportion of their programming. Separately, we provide best practice guidelines which give advice to broadcasters on ensuring the quality and usability of their access services.

Proposed changes to the TV access services code – in brief

We are proposing some changes to our TV access services code, including to clarify that access services need to be sufficiently high-quality to count towards the enforceable targets.

Proposed changes to the best practice guidelines – in brief:

We are also proposing changes to our best practice guidelines, expanding them to include advice for providers of video-on-demand ("VoD") services and account for different ways of watching programmes (e.g. via mobile or web-based platforms). Alongside this consultation, we are carrying out research among disabled audiences to further inform our final decisions on the guidance.

We are proposing to expand our overarching guidance on making programmes accessible to include additional advice on:

- serving people with cognitive and neurodevelopmental disabilities
- alternative means of making programmes accessible (e.g. improving dialogue audibility)
- customisation options and choice for viewers
- making emergency information accessible
- timely provision of access services for VoD content
- monitoring for quality, including seeking feedback
- considering accessibility issues early in the content production process

We are also proposing changes to the specific guidance in relation to different access services including for:

Subtitling:

- replace specific guidance on the way subtitles should be presented (e.g. specific fonts/ colours) with a description of key outcomes for audiences, including subtitles being easy to read, clearly visible against the background and clearly identifying speakers
- update the guidance on maximum delays in live subtitling to a more achievable figure (4.5 seconds average delay) to incentivise progress
- replace the existing guidance on maximum subtitling speeds with a principle that subtitling should generally be synchronised with the audio

Audio description (AD)

- acknowledge different approaches to AD styles

- support descriptions of visual features beyond those directly relevant to the plot, including diversity characteristics
- promote accessibility for programme types which are less suited to traditional AD, such as news

Signing

- add guidance for VoD providers, including to consult BSL users when prioritising different types of signed content
- add that providers should take account of different ways of accessing content (e.g. mobile apps) when determining the size of the signer
- remove the suggestion that Makaton and sign-supported English may contribute to the sign-language requirements (but retain encouragement to provide these services additionally).

2. Background and our proposed approach

Background

- 2.1 Broadcasters are required by law to provide subtitling, audio description and signing (“access services”) on a proportion of their programming. Subtitling and signing primarily helps those with hearing loss to access television, while audio description primarily helps those with sight loss. The requirements are set out in Ofcom’s [Code on Television Access Services](#) (the “TV access services code” or “the Code”).
- 2.2 There are currently no statutory requirements for access services on regulated on-demand programme services (“VoD services”)¹. However, the Digital Economy Act 2017 first paved the way for a requirement (in the form of statutory regulations) that VoD services are made more accessible. Following recommendations from Ofcom to Government on the form of the regulations in [2018](#) and [2021](#), the government has now proposed to include accessibility requirements in the [draft Media Bill](#) instead.²
- 2.3 In recent years, we’ve seen significant progress in the amount of subtitled, audio described and signed programming on television along with modest improvements in the accessibility of regulated VoD services.³ The growth of global streaming services has also brought about a much greater diversity in approach to accessibility (e.g. with increased options for customisation). This widening availability has corresponded with an increased focus on the **quality** of access services. Consumer groups and people complaining to Ofcom tell us that disabled people still face numerous challenges with the quality and usability of accessibility features: from inaccuracies and delays in live subtitling, to challenges with finding accessible programming on VoD services.
- 2.4 We have seen the development of new technologies to support accessibility, such as automatic subtitling and synthetic voices for audio description. While such technologies may enable production of more access services via cost/ time efficiencies, we want to ensure that their use does not unduly impact on the quality of provision. So, the question of what constitutes good quality access services is now key to ensuring that such developments enhance the experience of disabled consumers.

Regulating for quality

- 2.5 Ofcom has a duty to provide guidance on how broadcasters should promote disabled people’s understanding and enjoyment of television, including on meeting the statutory quotas. This guidance is set out in the TV access services code. Broadcasters subject to quotas need to ensure that their access services are of sufficiently high quality so as to be

¹ See Ofcom’s [Guidance notes on who needs to notify an on-demand service](#). A list of ODPS currently notified to Ofcom can be found [here](#).

² See Sections 368HL – 368HP of the [draft Media Bill](#).

³ For example, see our latest [TV and on-demand access services data report](#).

effective in contributing to the required amounts of subtitling, audio description and signing.

- 2.6 Our best practice guidelines are set out in a separate document. However, we expect broadcasters to have regard to [these guidelines](#) for further guidance on how they can ensure the quality and usability of their access services.
- 2.7 Ofcom has a duty to encourage both broadcasters and VoD providers to develop accessibility action plans with a view to continuously and progressively making their services more accessible to disabled people.⁴ We encourage providers to have regard to our guidelines to support the development of their plans.

Our proposed approach

- 2.8 Currently, our best practice guidelines include specific advice for broadcasters on how access services should be presented, some of which is based on outdated television standards.
- 2.9 Although we recognise the importance of consistency to audiences (and will explore this in our research – see 2.15), we think that very specific guidance on the format and presentation of access services (e.g. the size and font of subtitles) is no longer appropriate. As we discuss above, programming is now delivered in a variety of ways, across different services (e.g. catchup players, global subscription VoD services (“SVODs”)), platforms and devices (e.g. smart TVs, mobile phones). New technologies are enabling increased customisation and new ways to provide accessibility at scale (for example via automatic speech recognition for subtitles, or synthetic audio description using text-to-speech software). As a result, a ‘one size fits all’ approach is no longer viable. We think the guidelines will provide more constructive advice and are more likely to have an impact in practice, if we focus on key outcomes for audiences rather than the specific means by which these outcomes are achieved (for example, the principle of clearly differentiating speakers in subtitling, rather than specific guidance that colours should be used to do this).
- 2.10 We are proposing to expand the guidelines to provide advice for providers of VoD services, along with broadcasters.
- 2.11 We also want to broaden the scope of the guidelines to include people with disabilities other than sight/ hearing loss (see 4.2-4.4) and other means of making programmes accessible beyond the traditional access services (see 4.15-4.16).
- 2.12 We are also proposing to make some changes to the TV Access Services Code, including to set out more explicitly that we expect certain standards of quality for programming meeting the statutory quotas (see 3.2).
- 2.13 More broadly, and beyond this review of the guidelines and Code, we plan to continue to push for progress in access services quality by:

⁴ See our [TV Access Services Code](#) (2.3 and 7.2) and s368C(2) of the [Communications Act 2003](#).

- Keeping the guidelines and the accessibility section of our website under regular review, linking through to new research and approaches in accessibility.
- Creating a new working group on access services quality which convenes charities, broadcasters and VoD providers. The group would meet at least biannually to monitor progress against the guidelines and share best practice, including on the implications of new technologies
- Incentivising a greater number of broadcasters and VoD providers to develop and report to us on their accessibility action plans⁵ (e.g. via the working group and information requests). This information should help us to track progress across the industry.

Sources informing this review

2.14 There are a number of sources informing this consultation including:

- A series of roundtable and one-to-one meetings with broadcasters, VoD providers, charities, and researchers. We have not specifically attributed many of the points raised in these meetings, but they are reflected in the discussion below and proposed changes to the guidelines.
- A call-for-inputs to a limited number of larger broadcasters and VoD providers on specific areas, including their subtitling usage data and quality control measures. We received seven responses on subtitling usage levels and six responses to the other areas including quality control measures.
- Analysis of complaints to Ofcom on access service quality
- A desk review of existing research on audience preferences for access services and an [online survey carried out among BSL users](#) in 2021.

2.15 The desk review identified a number of studies in specific areas, but a lack of large-scale research covering expectations among different disability groups and across different services⁶ and delivery platforms⁷. Therefore, we commissioned a qualitative research study looking at the expectations and preferences of audiences for accessible programming across TV and VoD services. This research focuses on experiences of both finding and watching subtitled, audio described and signed programmes. The research is primarily covering people with sight and hearing loss, including BSL users, but also includes people with cognitive disabilities. The research is currently ongoing, and the findings will be published in due course.

2.16 Alongside consultation responses, the results from this research will feed into our statement on the guidelines, helping to ensure they are focused on key outcomes for audiences.

⁵ Broadcasters and VoD providers have a legal duty to provide Ofcom with a copy of any accessibility action plan they draw up. See s.303(1A) and s.368D(3)(zza) of the [Communications Act 2003](#)

⁶ E.g. live TV services/ catch-up service/ subscription on-demand service

⁷ E.g. TV/ mobile/ desktop

Note on terminology

- 2.17 We are very conscious that different people use and prefer different language to describe issues around disability. Throughout the Code, guidelines, and this consultation, we have attempted to use consistent terminology which reflects our conversations with disabled people and representative charities as above. To the extent that any terminology we use differs from terminology in the legislation, we have ensured that the terminology we have used has the same meaning. Generally we try to use language which reflects the [social model of disability](#) – so for example referring to ‘disabled people’ rather than ‘people with disabilities’. We also refer to ‘sight and hearing loss’ rather than ‘sight and hearing impairment’. But this will sometimes vary depending on context (for example referring to people with cognitive disabilities).

Impact assessment and Equality Impact Assessment

- 2.18 This document as a whole constitutes an impact assessment as defined in section 7 of the Communications Act 2003 (the “Act”). Impact assessments provide a valuable way of assessing different options for regulation and showing why the preferred option was chosen. They form part of best practice policy-making.⁸
- 2.19 We have assessed the impact of our decisions on specified equality groups in an ‘Equality Impact Assessment’ in Annex 2.

Consultation question

1: Do you have any comments on our proposed approach to making these changes?

⁸ For further information about Ofcom’s approach to impact assessments see our guidelines, [Better policy-making:Ofcom's approach to impact assessment](#)

3. Changes to the TV Access Services Code

- 3.1 Alongside the updated guidelines, we are consulting on some updates to the TV Access Services Code, to clarify the requirements in certain areas. The proposed updated Code can be found in [Annex 8](#): proposed additions are set out in underlined red text and highlighted (e.g. [example](#)), and deletions are marked in strike-through and highlighted (e.g. [example](#)).

Quality Standards

Proposed addition: access services must be of sufficient quality to contribute to fulfilling quotas

- 3.2 The Code sets out guidance and numerical quotas in relation to subtitling, audio description, and sign language on relevant television channels. As we have discussed elsewhere in this document, it is vital that access services are of high quality. Low quality access services can result in a poor experience for audiences that rely on them and, at worst, may result in programmes being entirely inaccessible. So we have now clarified in the Code that in order to contribute towards numerical quotas, access services must be of sufficient quality, and we outline a number of factors that we'll take into account in this regard (Code paras 4.7). We refer providers to the best practice guidelines for further guidance on promoting the understanding and enjoyment of their programmes by disabled people.

Promoting Awareness

Proposed addition: clarified expectations around communication with audiences about access service availability

- 3.3 In 2021 an incident at a broadcast playout centre resulted in disruption to several broadcast and VoD services, including an extended access services outage on Channel 4 for which Ofcom [found the broadcaster in breach](#) of its broadcast licence. One key factor in this decision was a failure to communicate effectively with affected audiences. We are proposing to clarify and strengthen the Code guidance in this area, for example including reference to timely on-air information for those audiences who may not follow online communications (Code paras 6.1-6.3).

Other changes

Proposed addition: clarified application of quotas across different platforms

- 3.4 Also following the 2021 access services outage, we are proposing to clarify the application of statutory targets across different platforms. Following the approach outlined in our [Channel 4 breach decision](#), this amendment would make it clear that percentage targets should be met by the service on each delivery platform where it is regulated, not calculated as an average across all delivery platforms (Code para 4.4).

- 3.5 Ofcom may be required by Government to give a direction to specified licensed broadcasters to include emergency announcements in their services. We propose updating the Code to remind broadcasters that any such information should be provided in a manner that is accessible to disabled people. (Code para 7.2) We also propose to refer broadcasters to further advice on making emergency announcements accessible in our best practice guidelines (Code para 7.3).

Proposed addition: clarification that subtitling is primarily for people with hearing loss

- 3.6 We are proposing to update our definition of subtitling in the Code to clarify that this service is primarily for people with hearing loss. This is to emphasise that in line with the legal framework⁹, subtitling contributing to the statutory quotas should be aimed at disabled people, particularly those with hearing loss, rather than translation subtitles for hearing audiences. We give further guidance in our best practice guidelines on making subtitles for people with hearing loss, including on indicating non-speech information (see 5.15) and making subtitles in the language used by the programme's intended audience for the spoken language (usually the same language as the programme's main spoken language (see 5.20).
- 3.7 We are also proposing to replace the references in the Code to people with hearing or visual impairments with people with sight/ hearing loss in line with our approach to terminology (see note on terminology).
- 3.8 In the Code section on 'action plans' we propose to refer broadcasters to further advice in the Best Practice guidance (Code para 7.5).
- 3.9 Finally, we are removing references to the transitional arrangements for financial contributions to alternative arrangements for signing (Annex 2) which were applied to longer running domestic channels when minimum contribution levels were increased from 2016. These arrangements ended in 2022 and all channels are now subject to the same contribution levels. We are also reinstating a short paragraph clarifying the application of exemption thresholds for signing. This paragraph was removed in error from a previous version of the Code (Code para 5.7),

Consultation question

2: Do you have any comments on our proposed additions to the TV Access Services Code?

⁹ Section 303 (1) of the Communications Act sets out that Ofcom's Code should give guidance as to the extent to which broadcasters should promote the understanding and enjoyment of disabled people, in particular people with sight and/ or hearing loss (referred to in the legislation as 'persons who are blind or partially-sighted' and 'persons who are deaf or hard of hearing').

4. Overarching guidelines

- 4.1 The best practice guidelines include both general guidance on making programmes accessible and guidance in relation to specific access services (subtitling, AD and signing). This section explains our proposals to expand the general guidance. The new proposed guidance can be found in [Annex 9](#).

Understanding audiences

Disabled audiences

Proposed addition: Providers should make their programming more accessible to people with other disabilities (beyond people with sight and/or hearing loss)

- 4.2 The description of audience groups in our existing guidelines focuses on people with sight and/ or hearing loss. However, the 2020 Audiovisual Media Services regulations made changes to our regulatory duties so that Ofcom now has a duty to provide guidance on how to promote the understanding and enjoyment of television by disabled people as a whole and *in particular* by people with sight and/ or hearing loss.¹⁰ The regulations also introduced duties on Ofcom to encourage broadcasters and VoD providers to develop accessibility action plans with a view to making their services progressively more accessible to disabled people (not only those with sight and/ or hearing loss).¹¹
- 4.3 We have identified a limited amount of existing research on how people with cognitive, neurodevelopmental and complex disabilities can benefit from the provision of access services. For example, Garman (2011) found that people with autism can find subtitles and audio description helpful to reinforce what is going on visually/ being said, along with indicative evidence that people with ADHD might find AD helpful and subtitles may be useful for those with dyslexia to improve spelling.¹² More recent research has explored how AD might support children with developmental disabilities including autism.¹³
- 4.4 We intend to explore further the benefits and use of access services by people with cognitive and neurodevelopmental disabilities in our qualitative research.

¹⁰ See the [Audiovisual Media Services Regulations 2020](#) and [Section 303 \(1\) of the Communications Act 2003](#)

¹¹ See our [TV Access Services Code](#) (2.3 and 7.2) and s368C(2) of the [Communications Act 2003](#).

¹² See Garman (2011), [Autistic spectrum, captions and audio description](#)

¹³ For example, research by Zabrocka (2022) has explored how AD might support the speech-language and social communicative skills of children with developmental disorders. See Zabrocka, Monika. (2022). The value of audio description for the therapy of speech-communicative disorders. [Revista de Investigación en Logopedia](#). 12. e75584. 10.5209/rlog.75584. In addition, research with autistic children by Braun and Staff (2021) also found that AD has the potential to assist audiences requiring help with interpreting emotional cues. See Starr K and Braun S, *Audio description 2.0: Re-versioning audiovisual accessibility to assist emotion recognition* in Braun, S. and Starr, K. (Eds) (2021). *Innovation in audio description research*. Abingdon, Oxon; New York, Ny: Routledge.

Choice and customisation

Proposed addition: Providers should offer customisation options and choice for viewers where practical, while also ensuring these services are easy to use

- 4.5 Consumer groups tell us that choice in ways of accessing content is important in helping to address differing audience needs. For example, while subtitling will help people with hearing loss to access foreign-language content, dubbing is more likely to help people with sight loss and people who find subtitles difficult to follow. Or some people with cognitive impairments might prefer slower, easy language subtitling, while some people with hearing loss prefer largely verbatim subtitles to provide an equivalent experience.
- 4.6 We recognise that providers do not have unlimited resources to make multiple versions of accessible content, and we understand that they will often need to focus on providing access services which best serve the largest proportion of disabled audiences. Our guidelines aim to support providers in making choices on how best to serve audiences, but we also want to encourage them to offer choice for viewers and customisation options where possible.
- 4.7 Developments in “object-based” media (whereby media content is produced, distributed and/ or consumed using separate digital media assets) are expanding the possibilities of customisation in aspects of access service provision.¹⁴ Global SVOD providers (including Amazon Prime Video, Netflix and Disney +) and BBC iPlayer now offer customisation options in subtitling presentation (e.g. for size/ colour/ font). Although personalisation options are becoming more common on web-based platforms, we understand that the possibilities for offering such options on traditional broadcast television are limited.¹⁵
- 4.8 We know that disabled people watch television with others who may not need or want to use access services. As and when technology develops, we hope that in offering choice and customisation, providers will include options for delivering access services separately to individuals (e.g. soundtracks with AD that can be delivered via headphones).
- 4.9 We are also aware that customisation options can bring additional complexity to the user interface and may cause usability issues for some audiences, e.g. those with sight loss. The use of default or automatic settings (where accessibility requirements are remembered) may support the ease of using such features.¹⁶

¹⁴ For more information on developments in technology relating to customisation, see Macroblock Ltd. and the School of Digital Arts’ report for Ofcom on [object-based broadcasting](#)

¹⁵ For example, see Macroblock Ltd. and the School of Digital Arts’ report for Ofcom on [object-based broadcasting](#), p.5-6

¹⁶ This is discussed in Macroblock Ltd. and the School of Digital Arts’ report for Ofcom on [object-based broadcasting](#), p.58.

Wider usage

Proposed addition: Providers should bear in mind the broader benefits of access services for all viewers

- 4.10 Access services can have broader benefits for all viewers; for example, subtitles can be used to support comprehension of the dialogue when watching in noisy or public environments. Some research (as [brought together by the Turn on the Subtitles campaign](#)) also suggests that subtitles may help to improve literacy levels for children.
- 4.11 To inform this consultation, we requested information from providers on subtitling usage levels (see 2.14). The information provided indicated that use of subtitles on different services ranged from roughly 5% to 20% of viewing (rounding to the nearest 5 percentage points)¹⁷ and that viewing of content with subtitles is more prominent among younger viewers. For example, where we had data on subtitle enabled viewing by age, the proportion of time spent viewing content with subtitles enabled was higher for those younger than 24 than the older age groups [almost one-fifth of total time spent viewing for the 13-15s and 16-24s was with subtitles enabled for one broadcaster]. Across other broadcasters there was higher subtitle enabled viewing for genres with younger age profiles and content targeted at younger viewers¹⁸. This is supported by findings from a [2023 YouGov survey](#) in which three fifths of 18-24s expressed a preference for watching content with subtitles on.¹⁹
- 4.12 We think that our guidelines can play a role in drawing attention to the broader use of access services, which may incentivise providers to view access services as a feature which attracts a range of audiences. However, disabled people need to remain the primary focus of access service provision.

Developing Strategies

Amounts of accessible programming

Proposed addition: Providers should increase access service provision as far as possible, while considering how best to balance their investment between quality and quantity of accessible programming.

- 4.13 Available research and stakeholder consultation suggests to us, unsurprisingly, that audiences would like to see a greater availability of accessible programming on TV,

¹⁷ This is a rough estimate: information from different providers was based on differing definitions of what constituted a view, for example, visits/ streams/ time spent with subtitles switched on.

¹⁸ In addition, one broadcaster was able to provide data at the platform level, which showed a far higher proportion of subtitle enabled views via the Amazon Fire platform and through PS4 consoles for this provider. Ofcom's Technology Tracker 2022 shows that viewing of TV content through a streaming stick to be more likely among the 16-34s, and ownership of a games console is more likely among the 16-24s, suggesting it is likely that this viewing came from younger viewers.

¹⁹ YouGov surveyed members of their panel in February 2023, asking the question "when watching TV shows or movies in your native language, do you generally prefer to have the subtitles on or off?". Three fifths of 18-24s expressed a preference for watching content with subtitles on.

particularly of audio description and signing. For example, our [survey on TV viewing among BSL users](#) showed that only two in ten respondents were satisfied with the availability of sign-interpreted programmes on TV with fewer than two in ten respondents satisfied with the availability of sign-presented programmes.²⁰ However, charities have also suggested to us that increasing the quantity of accessibility provision should not come at the expense of the quality of those services.

Proposed addition: Encourage providers and content suppliers to include access service files as part of acquiring/ selling content.

- 4.14 We understand that access services are not always shared as part of content acquisition deals between services. This can lead to duplication of work with providers' creating access services twice for the same programme, or the same programme being accessible on one service but not another. We propose to encourage providers and content suppliers to include access service files as part of acquiring/ selling content.

New Technologies:

Proposed addition: providers should ensure that the use of new technologies enhances the quality of access services

- 4.15 New technologies offer opportunities to enhance the experience of disabled audiences; for example, developments in object-based media²¹ are expanding possibilities for customisation and growth in automated technologies (e.g. automatic subtitling or synthetic AD) may enable production of more access services. However, the use of such technologies should not detract from the quality of provision.
- 4.16 Developing technologies are already being adopted to some extent; for example, our understanding is that nearly all broadcasters now use automatic speech recognition (ASR) to support the production of subtitles, in combination with human-input. However, while broadcasters are keeping track of developments in this area, ASR on its own is currently not generally considered sufficient to serve deaf and hard of hearing audiences (e.g. in relation to indicating speakers/ punctuation and the technology's limitations regarding cross-talk).
- 4.17 As set out at 2.9, we aim to future-proof our guidelines by focusing on key outcomes for audiences, while allowing for the use of different technologies to achieve them. We propose to make clear that providers should assess new technologies against these outcomes, together with seeking audience feedback, to help determine the potential impact on quality. We also plan to refer broadcasters to the TV access services code which sets out the factors that Ofcom will take into account in assessing whether access services

²⁰ Sign-interpreted is where a signer on the corner of the screen translates the dialogue into sign language and sign-presented programming is where all the characters and presenters use sign language.

²¹ For more information on object-based media, see Macroblock Ltd. and the School of Digital Arts' report for Ofcom on [object-based broadcasting](#)

are of sufficient quality to meet the statutory targets, regardless of the technologies used (see 4.6-4.7 of the draft Code).

- 4.18 We welcome views on how developments in new technologies may inform production of access services in the coming years.

Types of Accessible Programming

Proposed addition: Encourage providers to consider additional means of improving the accessibility of their programming (such as using Makaton/ improving dialogue audibility etc)

- 4.19 Subtitling, audio description and signing are not the only means of making programmes accessible to disabled people. For example, some people with learning or communication difficulties may benefit from programmes made in Makaton. The BBC series [Something Special](#) uses Makaton to help young children learn how to communicate and develop their language skills. While very few programmes are currently made in Makaton in the UK, Makaton is used by over 100,000 children and adults of all ages with learning or communication difficulties.²²
- 4.20 We have also seen developments in alternative ways of making programmes accessible to people with sight/ hearing loss. For example, it is now possible to adjust the sound balance on some TVs²³ and developments in object-based media are bringing about further possibilities to adjust sound levels, including enhancing dialogue audibility for people with hearing loss.²⁴ Additional means of making programmes accessible to people with sight loss are also discussed in Section 7 on audio description.

Accessibility Action Plans

Proposed addition: Guidance on developing accessibility action plans

- 4.21 Providers do not have unlimited resources, so need to plan carefully how to progressively improve the accessibility of their services. In line with our duty in this area (see 4.2) we propose to introduce guidance to providers on developing accessibility action plans. Our suggested advice includes to consider both quantity and quality of access services; consult with disabled audiences; involve senior management; and integrate plans with broader strategies (see 3.1-3.3 of the proposed guidelines for more detail). This guidance aims to ensure that action plans reflect audience priorities, while being embedded from the start of wider product development strategies.

²² See The Makaton Charity's [website](#).

²³ For example, see [Freeview's article on Improve your TVs Sound](#)

²⁴ The use of object-based media to improve dialogue audibility is discussed in Macroblock Ltd. and the School of Digital Arts' report for Ofcom on [object-based broadcasting](#)

Prioritising Programmes and Promoting Awareness

Programme selection and scheduling

- 4.22 Our existing guidelines provide advice for broadcasters on selecting and scheduling programmes, including: to avoid meeting the statutory targets through scheduling multiple repeats, to seek advice from disability groups and, when a programme series begins with access services, to ensure that all programmes in that given series are made accessible.

Proposed addition: Providers should prioritise making occasions of national importance accessible with subtitling, signing and spoken descriptions.

- 4.23 The Royal National Institute for Deaf People (“RNID”) have suggested that we expand our guidance on programme selection to advise that occasions of national importance should be made accessible, in particular with BSL signing. They mentioned the signed coverage of the funeral of Her Majesty Queen Elizabeth II on BBC Two as a positive example of this. However, some providers have raised concerns that ‘moments of national importance’ lacks clarity and would need to be more narrowly defined.
- 4.24 We agree with the RNID that disabled audiences should be able to access key cultural, political and societal events. However, it would not be practicable to define an exhaustive list of such events, which are likely to evolve over time. We are aiming to set out high-level goals and think providers should consult their audiences to help determine which events are considered to be of ‘national importance’.

Proposed addition: Providers should make every effort to add access services to on-demand programming as soon as it is made available

- 4.25 While the existing guidelines focus on broadcast television, there are some distinct considerations in relation to programme selection/scheduling for access services on on-demand programming. Rather than following a linear schedule, VoD providers often release whole series of programmes at one time on their services. As a result, providers have told us that they do not always have sufficient time to create access services between receiving the given series from content providers and the content release date.
- 4.26 The RNID suggests that access services being delivered late for popular on-demand programming is a key frustration for relevant audiences. Similarly, the Royal National Institute of Blind People (“RNIB”) highlights that even when a boxset is made available online in one go the audio description is often only added after an episode has been broadcast on television, which again is a key frustration for AD users. We agree that disabled audiences should be able to enjoy popular shows at the same time as everyone else. So, we want to encourage providers to build in time for creating access services as an integral part of negotiating content rights windows and scheduling content release dates. If this is not possible despite best efforts, we think providers should make clear if, and when, access services will be added to the programme, to reduce uncertainty for viewers.

- 4.27 VoD providers may keep content on their services for varying periods of time. The amount of new content that is added to different services may also vary dramatically. To ensure that a mix of archive and new content is made accessible, we think VoD providers should refresh provision of their access services at least at the same rate as they refresh content on their service more generally.

Proposed addition: VoD providers should consider the popularity and usability of given platforms and consult with audiences and/or disability groups in choosing which to prioritise

- 4.28 Providers also face additional development work (and in some cases technical challenges) to make their on-demand programmes accessible on the various different platforms²⁵ that are used to view their service. While on-demand regulations are not yet in place (see 2.2), we expect providers to continue to build up their provision. Therefore, we are proposing to introduce some guidance to providers on prioritising platforms, including consulting with audiences/ disability groups and considering the platforms' popularity and usability (i.e. the usability features for disabled people offered by the platform).

National emergencies and other information

Proposed addition: Providers should ensure that broadcast information about national and local emergencies is subtitled, signed and spoken

- 4.29 During the COVID-19 pandemic, the lack of sign-interpretation on certain televised briefings by the UK Government, together with the 'where is the interpreter campaign', shone a light on the importance of making information about national emergencies accessible. Our existing guidelines state that broadcast information, including relevant telephone numbers, should be subtitled (preferably in open captions) in case of national and local emergencies. However, we propose to update this to clarify that we consider broadcast information, including relevant telephone numbers *and links to further information*, should be subtitled, *signed and spoken*.
- 4.30 We also now remind broadcasters that, as set out in the TV access services Code, they must make accessible any emergency announcement which Ofcom has directed them to make at the request of Government.

Proposed addition: In accessible programmes, important on-screen information should also be accessible.

- 4.31 The existing guidelines say that where product placement is signalled on screen, any audio description should convey this information. We propose to extend this to a broader principle that, where a programme is accessible, providers should make every effort to

²⁵ By platform, we mean the interface in relation to which the on-demand provider has to put in substantive development work to establish access service capability. For example, this could include different mobile operating systems (e.g., iOS/ Android) and different connected TV platforms (e.g Samsung/ Apple).

ensure that important on-screen information (for example flashing image warnings) is accessible too.

Promoting Awareness

Proposed addition: Extended advice on communicating with relevant audiences and raising awareness

- 4.32 As described in section 3 we are proposing changes to the TV access services Code to clarify our expectations in relation to communicating with audiences about accessibility. Broadcasters have a statutory duty to promote awareness of availability of their access services to potential users.
- 4.33 We also propose to extend the associated advice in our best practice guidelines, covering awareness of access services both as a general feature and in relation to availability on specific services, platforms and programmes. We also cover communication with audiences when something goes wrong with access services provision. Instead of specifying the need to apologise to audiences, as in the existing guidelines, we have emphasised the need to communicate with relevant audiences, giving updates using a range of effective means, including on-air announcements and information on-line and via social media.

Proposed addition: Awareness guidance applied to VoD providers

- 4.34 The proposed amendments are also intended to apply to VoD providers with the aim of encouraging these providers similarly to engage effectively with audiences to increase awareness of their access services. We also ask VoD providers to consider features such as filtering and content categories which make accessible programmes easy to find.

Proposed addition: Encourage provision of pre-sale information on accessibility

- 4.35 We understand that it is particularly frustrating for people to purchase paid-for services only to discover that they do not carry the access services needed. In the revised guidelines we want to encourage all providers to make information available (before point of sale) about the extent to which their services are accessible on different platforms and devices.

Accessibility and Diversity in Production

Accessibility

Proposed addition: Providers and content makers should consider accessibility issues early on in the commissioning and production process.

- 4.36 Access services are generally created by access service providers²⁶ or by providers' in-house teams after programmes have been made. However, researchers have explored

²⁶ Specialist companies which make access services

various ways in which considering accessibility issues earlier on in the content production process, and collaboration between content production teams and media accessibility experts, may enhance the experience of disabled audiences. For example, Romero-Fresco and Fryer's [accessible film making guide](#) funded by the British Film Institute looks at integrating considerations for multiple access services, including subtitling, AD and signing, into the production process.²⁷ Broadcasters are also starting to explore collaboration with content production teams; an example of this is ITV's character descriptions for people with sight loss for *Trigger Point* and *Love Island* where the programmes' actors voiced their own introductions.

- 4.37 Consumer groups also advocate for earlier consideration of accessibility issues; for example, we understand that some people with milder sight loss (who do not use AD) can have difficulties reading on-screen text of key relevance to the programme's plot (e.g. text on characters' mobile phones). Considering such issues at production stage (for example, by ensuring text included in shots is clearly visible with high-contrast colours) may help to ensure that programmes can be enjoyed more easily by a greater number of viewers. Such changes rely on people in production teams being aware of how to make their content more accessible. We encourage providers to discuss with content makers at commissioning stage how to support this awareness of accessibility issues (for example by including content accessibility experts in productions).

Diversity

Proposed addition: Teams involved in making accessible programming, including audio describers and signers, should reflect the diversity of their audiences

- 4.38 We know that disabled people are significantly under-represented in the TV industry.²⁸ More specifically, some stakeholders have told us that there is a lack of diversity among audio describers and signers. We have also heard calls for disabled people to form an integral part of the wider teams making access services (e.g. for someone with sight loss to review audio described programmes before they are broadcast).
- 4.39 Ofcom carries out ongoing work to improve diversity in the broadcasting industry (for more information see our [Diversity in Broadcasting Hub](#)). We believe that the inclusion of people from all backgrounds, at all stages of programme making, is crucial for connecting with audiences and the production of access services is no exception to this. Teams involved in making access services should reflect the diversity of their disabled audiences to better meet their needs/ preferences.

²⁷ Romero-Fresco, P. and Fryer, L. (2018) *Accessible Filmmaking Guide*, London: British Film Institute

²⁸ For example, see our 2021-22 report on [diversity in the UK broadcasting industry](#)

Training

Proposed addition: People making access services (including subtitles, audio description and signing) should be appropriately trained.

4.40 Our current guidelines do not include any advice on the training of access service professionals. However, we recognise that creating access services is a specialist skill, requiring considerable expertise and informed judgements on a case-by-case basis. We therefore plan to make clear that people making access services should be trained appropriately.

Quality Assessment

Monitoring

Proposed addition: Providers should consider using quantitative tools to assess the quality of their access services

4.41 Our existing guidelines set out that broadcasters should both regularly check that scheduled access services are being played out correctly and monitor the quality of their access services. In response to our request for information (see 2.14), several broadcasters told us that they use quantitative tools to measure subtitling quality, including versions of the NER model²⁹ (which is used to calculate the % accuracy of subtitled programming), and their own methodologies (including to look at subtitle placement/ punctuation). While two providers said they did not have any specific software to measure latency (the delay between speech and subtitling in live programming), another two said that they measured the latency of subtitling on their programming every month. One respondent said that they review a selection of their content against their own guidelines.

4.42 Several providers also told us that feedback from viewers informs their assessments of quality. Feedback is gathered in a variety of ways: audience panels (including asking viewers to provide feedback on specific programmes); assessing submitted complaints/ feedback; audience surveys; and seeking input from charities.

4.43 Taking account of these responses, we plan to expand our guidance to encourage providers to consider using quantitative models (in addition to viewer feedback) to help to assess the quality of their access services. We also propose to add that quality assessments should include monitoring against specific goals included in accessibility action plans (see 4.21) to ensure that providers continue to track progress against these plans.

4.44 We also propose to refer in this section to Ofcom's [Television Technical Performance Code](#) which was recently updated to require Channel 3, Channel 4 and Channel 5 to ensure that

²⁹ The NER model was developed by Pablo Romero-Fresco and Juan Martinez. A description of the NER model can be found [here](#).

the presence and reliability of scheduled access services is given the same priority as the programmes' vision and sound components.

Seeking Feedback

Proposed addition: Feedback/complaints routes should be accessible at all points in the process, from providing a variety of complaints routes to responding in plain language

- 4.45 Our existing guidance on seeking feedback includes that broadcasters should consult with disability groups and provide contact details on their website (including email address and telephone and textphone numbers). However, charities point out that disabled people can face additional barriers to providing feedback and that broadcasters should do more than this to make their complaints routes accessible.
- 4.46 We plan to strengthen our existing guidance to clarify that feedback and complaint routes should be accessible *at all points in the process*. To achieve this, providers should provide a variety of complaint/ feedback routes, ensure that complaint routes are easy to find on websites, and respond to complaints in a timely manner and in plain language (for more detail of our guidance here, see 6.4-6.6 of the proposed guidelines).

Proposed addition: Providers should seek feedback proactively, rather than relying only on complaints.

- 4.47 Taking account of responses on existing feedback routes (see 4.42) we plan to set out that providers should seek views *proactively* rather than relying only on complaints routes. This could be achieved in a variety of ways (e.g. consulting with charities/ setting up advisory panels/ conducting research).

External Sources

- 4.48 We are planning to retain the existing guidance that broadcasters should have regard to equal opportunities legislation. We also propose to add links in the guidelines to our [broadcasting code rules](#) and [VOD editorial rules](#). Access services are part of the editorial content so should comply with these rules.
- 4.49 Our existing guidelines also provide links to various external sources/ guidelines on accessibility best practice. We are planning to replace this section of the guidance with a new page on our website which will be regularly updated. This page will provide links to external sources, including guidelines and examples of innovation/ good practice. For example, we plan to link to the UK Digital Television Group's [Usability and Accessibility Guidelines](#) ("U-Book") which include detailed guidelines on ensuring the accessibility of products used to access digital TV, including guidance for device manufacturers and platform providers.
- 4.50 We asked a limited number of providers about what external guidelines they use to inform their provision. Several providers mentioned the BBC's [subtitle guidelines](#) as a key

resource. Also mentioned were the W3C's [Web Content Accessibility Guidelines](#), the [W3C Media Accessibility User Requirements](#), and the [BBC Mobile Accessibility Guidelines](#).

4.51 We've proposed an initial list of external sources to refer to on our website in Annex 3.

Consultation questions on overarching best practice guidelines:

3: Do you have any comments on any of the following proposed changes/additions? Please provide any additional evidence you think we should take into account.

- Understanding audiences
- Developing strategies
- Programme selection and scheduling
- National emergencies and important on-screen information
- Promoting awareness
- Accessibility and diversity in production
- Training
- Monitoring of quality

4: Do you have any views on how developments in technology may inform the production of access services in the coming years?

5: What do you think about the proposed list of external sources/ guidelines in Annex 3? Are there any additional sources which Ofcom should refer to?

5. Subtitling guidelines

- 5.1 This section sets out key issues for consideration and our main proposed changes to the subtitling section in the best practice guidelines. Annex 1 sets out a comprehensive summary of all proposed changes.

Issues for consideration

Synchronicity, speed and accuracy:

Proposed change: Replace reference to specific subtitling speeds with principle that subtitling should generally be synchronised with the audio as closely as possible, with proviso that providers should bear in mind the intended and/or likely audience for their programmes.

- 5.2 When determining the rate of subtitles, there are potential trade-offs to be struck between reflecting the content verbatim³⁰ and ensuring the readability of the subtitles. Broadcasters might provide more heavily edited, slower subtitles, or faster, verbatim subtitles. When we first introduced our guidelines in 2006, we set out recommended maximum subtitling rates (160-180 words per minute (WPM) on pre-recorded programmes and 200 WPM on live programmes) based on research indicating that faster speeds were more difficult to follow.³¹
- 5.3 Since then, a significant number of studies have looked at subtitling rates, but conclusions vary. For example, results from the EU-funded project DTV4ALL (Romero-Fresco, 2015) suggest that fast subtitles (200WPM) may result in viewers spending the majority of their time reading the subtitles with on average 20% of the time to look at the image³². Romero-Fresco (2022) suggests that this can have implications for the viewing experience, such as important on-screen elements (not placed in the central elements of the shot) being missed by viewers.³³ While Kruger et al. (2022) have suggested that comprehension of subtitles declines at faster speeds,³⁴ Szarkowska and Geber-Morón (2018) suggest that most viewers can read the subtitles and view the images even with fast subtitle speeds.³⁵ Sandford's BBC research (2015) also found 'no problems associated with the rate of subtitles when they matched natural speech, regardless of the rate in words per minute'.³⁶

³⁰ Reflecting the spoken language with word-for-word accuracy in the subtitles

³¹ See Ofcom's 2006 [review of television access services](#).

³² Cited in Romero-Fresco, P. 2022. "Subtitling" @ *ENTI (Encyclopaedia of translation and interpreting)*. AIETI. p.12. <https://doi.org/10.5281/zenodo.6370769>

³³ Romero-Fresco, P. 2022. "Subtitling" @ *ENTI (Encyclopaedia of translation and interpreting)*. AIETI. pp. 18-19. <https://doi.org/10.5281/zenodo.6370769>

³⁴ Kruger, J., Wisniewska, N., & Liao, S. (2022). Why subtitle speed matters: Evidence from word skipping and rereading. *Applied Psycholinguistics*, 43(1), 211-236. doi:10.1017/S0142716421000503

³⁵ Szarkowska A, Gerber-Morón O (2018). Viewers can keep up with fast subtitles: Evidence from eye movements. *PLoS ONE* 13(6): e0199331. <https://doi.org/10.1371/journal.pone.0199331>

³⁶ Sandford, J. (2015). The Impact of Subtitle Display Rate on Enjoyment Under Normal Television Viewing Conditions. Accessed at: <https://www.bbc.co.uk/rd/publications/whitepaper306>, p.7

- 5.4 Rather than aiming for specific speeds, charities representing people with hearing loss tell us that subtitles should reflect the content verbatim by matching the speed of the speech: this is important for providing an equivalent experience of the content and can also help with lip-reading. Most complaints we receive from consumers about subtitling quality focus on subtitles being out of sync with the audio and/or not accurately reflecting the content, rather than being too fast/ slow. In general, we understand that broadcasters aim to provide verbatim, synchronous subtitles, while editing out some filler words (umms/errs) where they do not convey meaning³⁷.
- 5.5 Subtitle users are not a homogenous group and needs/ preferences may vary depending on disability or age. For example, Kantar’s 2017 research for the Communications Consumer Panel³⁸ found that subtitling speed was an issue for older and deafblind participants (participants with both sight and hearing loss), with subtitles sometimes changing too quickly making them difficult to read.³⁹ We also know that some sign-language users have lower fluency in English⁴⁰, and can find it difficult to follow subtitles easily⁴¹. Some people with reading difficulties and/ or cognitive disabilities might find non-verbatim subtitles more accessible; EASiT (an Erasmus + funded project) is currently looking at how easy reading⁴² might merge with other existing access services including subtitling.⁴³ We plan to explore perceptions of subtitling speed in our audience research (see 2.15), which, along with stakeholder responses, will further inform the revised guidelines.
- 5.6 Our current guidelines state that slower, more heavily edited subtitles may be appropriate for children. However, while young children are likely to read more slowly than adults we are aware that the need for editing may depend on the speed of speech⁴⁴. We also understand that accurate, verbatim subtitles may support children in developing literacy skills.

³⁷ For example, see 14.1 of the BBC’s [subtitle guidelines](#)

³⁸ See [About us - Communications Consumer Panel](#)

³⁹ See the Communications Consumer Panel’s [Access to Broadcast and On-Demand Content report](#).

⁴⁰ The 2021 Census for England and Wales showed that out of the 21, 632 people who said they use BSL as a main language, 39% cannot speak English, 29% cannot speak English well and the remaining 32% able to speak English very well or well.

⁴¹ For example, [Ofcom’s 2021 online survey](#) among BSL users (Question 5) found that, when asked about whether they could follow TV programmes with subtitles only and no sign-interpretation, one in ten said they were unable to follow TV programmes with subtitles only. More than four in ten said they could follow programmes with subtitles only but with some difficulty and a similar proportion said they could follow programmes easily with subtitles only.

⁴² An access service that adapts texts so they are easier to read and understand

⁴³ Matamala, A and Orero, P (2018), *EASiT: Easy Access for Social Inclusion Training* [accessed at https://www.academia.edu/71155927/EASiT_Easy_Access_for_Social_Inclusion_Training]

⁴⁴ This is recognised in the BBC’s subtitling guidelines which state: “subtitles for children should follow the speed of speech. However, there may be occasions when matching the speed of speech will lead to subtitle rate that is not appropriate for the age group.” See the [BBC’s subtitling guidelines](#), section 20.2

Subtitles on live programming⁴⁵

Proposed change: Replace the recommended 3 second maximum latency for live subtitling with an average latency of 4.5 seconds, retaining our guidance to broadcasters on reducing latency.

- 5.7 The quality of live subtitling is a particular area of concern for viewers⁴⁶; there are significantly more inaccuracies and less synchronisation in comparison with pre-prepared subtitling on pre-recorded programming. Responses to our request for information on subtitling usage (see 2.14) also indicated that viewing to genres usually viewed live (News, Sport) was less likely to take place with subtitles on, which could potentially relate to the lower quality of live subtitling.
- 5.8 While there are different methods to produce live subtitles including respeaking⁴⁷, stenography⁴⁸ and automated subtitling⁴⁹, some level of delay between the speech and subtitles (“latency”) is currently unavoidable. Our existing guidelines recommend a maximum latency of three seconds, but broadcasters tell us that this is unrealistic.
- 5.9 Based on information from five broadcasters in response to our voluntary request (see 2.14), we consider that an average (mean) latency of 4.5 seconds across live programming is in line with the best achieved latencies for individual broadcasters. A 4.5 second delay is also broadly in line with the best achieved latencies for individual broadcasters measured in samples of broadcast programming as part of our 2014-2015 live subtitling review.⁵⁰ We think that our recommended latency needs to be realistically achievable in order to incentivise improvement.
- 5.10 We recognise that latency in live subtitling can vary depending on a number of factors, including the programme genre, the availability of pre-recorded subtitles that are ‘cued out’ live, and the production method (e.g. respeaking v stenography). Therefore, we are suggesting an average (rather than maximum) latency across live programming taken together, while recognising that this may be more challenging on certain programme types (e.g. some sports and fast-paced chat shows).
- 5.11 We also plan to retain our encouragement for broadcasters to reduce delays and inaccuracies in their live programming, including by obtaining scripted material and preparing special vocabulary. Drawing on the findings from our 2014-15 live subtitling review, we also propose to encourage broadcasters to maximise the use of pre-prepared

⁴⁵ E.g. News, sports, live entertainment shows.

⁴⁶ The RNID tell us that the majority of complaints they receive on linear TV subtitling focus on inaccuracies and delays in live programming.

⁴⁷ Respeaking is when the subtitler repeats what they hear on the live programme into voice recognition software, which then generates the subtitles

⁴⁸ Stenography is when the subtitler types what they hear on stenotype machines (which have keys that match phonetic sounds) to generate the subtitles.

⁴⁹ We understand that some broadcasters now use automated speech recognition, in some cases combined with human input, to produce live subtitling.

⁵⁰ See our [2014-2015 review of live subtitling](#)

block⁵¹ subtitles in sections of live programmes and, where possible, make use of a technique to reduce latency known as ‘switchable delays’.⁵²

Subtitle presentation

Proposed change: Replace specific guidance with principle that subtitles need to be easy to read, clearly visible against the background and positioned to avoid obscuring the speaker’s mouth/ other vital information (taking into account varying screen sizes).

- 5.12 Our existing guidelines contain specific guidance on subtitle presentation, some of which is based on outdated television standards (e.g. subtitling should use the Tiresias Screen Font/ take up 20 television lines). However, such guidance does not account for developments in consumer equipment and the variety of devices through which people now watch content, for example on larger TVs and smaller mobile phone screens. Moreover, the growth of global streaming services has brought about a much greater range of stylistic approaches to accessibility features. For example, while UK broadcasters tend to use colours to indicate multiple speakers on their programmes (as recommended in our existing guidelines), SVoD providers tend to use hyphens/ positioning. Or, while UK broadcasters tend to use the # symbol to indicate music, SVoD services often use a musical note symbol.
- 5.13 Broadly, we aim to make the guidelines more principle-based and focused on key outcomes for audiences (see 2.9). For example, our initial view is to replace our advice on particular fonts with guidance that providers should bear in mind that some audiences might find subtitles more difficult to read (e.g. deafblind people or dyslexic people) and choose their fonts accordingly (e.g. with simple shapes and characters which are not easily confused)⁵³. We intend for our proposed changes to be applicable across different delivery platforms and flexible enough to account for customisation.

Proposed change: Replace specific guidance on speaker and sound identification with principle that speakers should be clearly identified and sound/music effects clearly described.

- 5.14 Our current guidelines specify that multiple speakers should be indicated through the use of different colours. We propose an approach based on the general principle that speakers need to be clearly identified (e.g. via colours, punctuation/ positioning)
- 5.15 Similarly, our current guidelines specify how non-speech information should be indicated – for example, music by using the # sign and louder speech/ shouting by using capitals. Our proposed change focuses on clearly indicating to audiences where words are e.g. sung or shouted (which could mean using a musical note symbol, for example).

⁵¹ Subtitles that appear on-screen as one block of text, rather than word-by-word

⁵² i.e. allowing subtitles - but not audio or video- to shortcut delays inherent in the coding, multiplexing and playout processes

⁵³ For example, for more information on accessible fonts see this article by [Scope](#).

Proposed change: Providers should consider customisation options in subtitle presentation.

- 5.16 Offering customisation in subtitling presentation can help address different needs, for different audience groups (e.g. deafblind viewers who might prefer larger subtitles) or different viewing circumstances (e.g. presentation on different size screens).
- 5.17 Customisation is not always compatible with specific guidance on the means of achieving particular effects. For example, the current approach of UK broadcasters to indicate multiple speakers with specific colours may not be compatible with offering viewers a choice of colours. This is another reason why we have moved away from some specifics towards guidance around the end results for audiences.
- 5.18 We do acknowledge however that consistency in subtitle presentation might help some viewers to follow subtitles more easily. In our audience research (see 2.15), we intend to explore views on customisation options and consistency in subtitling presentation.

Sound and music descriptions

Proposed change: Sound and music descriptions should be specific rather than generic, to describe the sounds as clearly as possible

- 5.19 Description of non-speech information, such as sound effects, music and tone of speech, is a key feature of subtitles for people with hearing loss. Providers suggest that description of sound effects should be specific rather generic to reflect the sounds as clearly as possible (e.g. describing the tone of music rather than just indicating ‘music’). For example, Netflix uses descriptive sound effects in line with its subtitling style guide⁵⁴ which appears to have been positively received by audiences⁵⁵. In the proposed new guidelines we say that subtitlers should be encouraged to use their creativity to capture the essence of sound effects. We intend to explore views on description of non-speech information in our audience research.

Subtitling language

Proposed addition: Providers should make subtitles in the same language as that used by the programme’s intended audience for the spoken language

- 5.20 Unlike translation subtitles, we think that subtitles for people with hearing loss should be in same language as used by the intended audience for its spoken language (usually the same language as the main spoken language of the programme) – for example, we would expect Welsh language programming to be subtitled in Welsh. This is important for providing disabled viewers with equivalent access to the content as the broader intended audience. Viewers who rely on lip reading also need subtitles that reflect the speech.

⁵⁴ See the speaker ID/ sound effects section of Netflix’ English [Timed Text style guide](#)

⁵⁵ For example, see this [Vulture article](#).

Additional changes

- 5.21 Along with the changes outlined in the key discussion areas above, we are proposing some additional changes across the different areas of the subtitling guidance. Table 1 in Annex 1 sets out a summary of all the changes we are proposing, including additional changes not described above, with brief explanations. Our full existing guidelines can be found [here](#) and proposed guidelines are included in [Annex 9](#).

Consultation questions on subtitles:

6: Do you have any comments on the following suggested changes relating to subtitling?

Please provide any additional evidence that you think we should take into account.

- Subtitling speeds
- Live programming
- Subtitling presentation
- Sound and music descriptions
- Language of subtitling

7: Do you have any comments about the other proposed changes to the subtitling guidelines, as summarised in Table 1 (Annex 1)?

8: Is there anything additional that you think should be added to the revised guidelines on subtitling?

6. Audio Description Guidelines

- 6.1 This section sets out key issues for consideration and our main proposed changes to the audio description section in our best practice guidelines. Annex 1 sets out a comprehensive summary of all proposed changes.

Styles of audio description

Proposed change: Replace reference to using an ‘impersonal style’ with encouragement to consider different approaches to audio description styles, taking account of audiences’ preferences/ the programme genre.

- 6.2 Our current guidance suggests that AD delivery should be ‘unobtrusive and impersonal’, while also matching the programme genre and adding ‘emotion and lightness of touch’ where appropriate. However, researchers have increasingly questioned the idea that audio description should be impersonal/ objective and suggested that audiences can respond positively to more creative styles of audio description. For example, Fryer and Walczak’s 2017 study with Polish adults with sight loss showed that clips of creative descriptions (including elements of film terminology and subjective descriptions of the main elements of AD) were assessed more favourably than standard AD, with participants experiencing a greater sense of immersion.⁵⁶
- 6.3 Moving away from ‘impersonal’ descriptions, the [enhancing audio description](#) project has developed an immersive form of audio description which includes the use of first-person narratives, spatial audio and additional sound effects. Research for the project showed that enhanced AD was ‘successful in gaining acceptance from both visually impaired and sighted audiences’ but that there was a diversity of views and preferences in relation to traditional and enhanced AD.⁵⁷ López, Kearney and Hofstadter therefore argue that enhanced audio description should be offered alongside standard AD in order to cater for different aesthetic preferences.
- 6.4 Our proposed guidelines encourage providers to consider different approaches to AD and tailor provision to their given audience’s needs and the genre/ programme type. However, we intend to explore audience preferences for the style and tone of audio description further in our audience research.

⁵⁶ Walczak, A., & Fryer, L. (2017). Creative description: The impact of audio description style on presence in visually impaired audiences. *British Journal of Visual Impairment*, 35(1), 6-17. <https://doi.org/10.1177/0264619616661603>

⁵⁷López, M., Kearney, G., & Hofstadter, K. (2021). Enhancing Audio Description: Inclusive Cinematic Experiences Through Sound Design. *Journal of Audiovisual Translation*, 4(1), 157–182. <https://doi.org/10.47476/jat.v4i1.2021.154>

Describing beyond the plot

Proposed change: Add that AD should be sensitive to other visual features beyond those directly relevant to the plot, including diversity characteristics, which may be of interest and relevance to audiences (without assuming default characteristics).

- 6.5 Our current guidelines focus on describing visual information where it is relevant to the plot. However, this traditional view has been challenged and revised by researchers and broadcasters, particularly in relation to description of diversity characteristics (such as race, disability, gender). For example, ITV [introduced guidance](#) on describing diversity characteristics even where not directly relevant to the plot, following consultation including with AD users and inspired in part by research on [describing diversity in theatre AD](#) run by VocalEyes and Royal Holloway, University of London. ITV concluded from its consultation process that ‘information about diversity should be described wherever possible, because it is likely to be of interest to at least some of the audience’. Similarly, Netflix’ [audio description style guide](#) encourages descriptions beyond only what is relevant to the narrative, stating that ‘when considering whom to describe and in what detail, consider both the needs of the plot and the importance of representation’.
- 6.6 The broadcasting industry has made efforts to improve representation of people from under-represented groups on television⁵⁸, and we do not think that people with sight loss from under-represented groups should be excluded from increased opportunities to see people like them represented on-screen. However, some stakeholders have raised concerns to us around describing additional diversity information, for example around the challenges of not assuming a default (e.g. by only describing characters from under-represented backgrounds) while also fitting descriptions (along with other information that needs describing) within the limited gaps in the main soundtrack. Given the limited space available within programmes, ITV have explored the use of audio introductions as a place to provide additional diversity information (e.g. see their [Trigger Point character introductions](#)).
- 6.7 We are planning to explore audience perceptions of descriptions of diversity information further in our research (see 2.15), which along with consultation responses, will inform our final decision on the revised guidance.

Additional audio accessibility features

Proposed addition: Point to the potential use of audio introductions and extended AD

- 6.8 Our existing guidelines recognise that audio description is better suited to certain genres than others; some dialogue-driven programmes offer little space in the soundtrack to add descriptions. However, since we first introduced the guidelines, we have seen developments in alternative ways of making programmes accessible to people with sight

⁵⁸ See for example the Creative Diversity Network’s report [The Fifth Cut: Diamond at 5](#)

loss. This includes the use of audio introductions⁵⁹ and extended audio descriptions⁶⁰ as means of providing additional detail that there is not space to provide within the gaps in the programme dialogue.

Proposed addition: Encourage the use of integrated descriptions for certain types of programming including news

- 6.9 Small changes during production can make a significant difference to the accessibility of some programmes to people with sight loss. The RNIB point to “integrated descriptions” in dialogue-driven programmes— for example by presenters reading out on-screen text in quiz shows. While traditional AD may not always be conducive to shared viewing experiences, integrated descriptions may help people with sight loss to enjoy programmes with their friends and family. Where the idea of integrated descriptions is taken even further it may offer an alternative approach to an additional audio description soundtrack – for example see the use of integrated descriptions by the [Canadian media company AML](#).
- 6.10 The inaccessibility of on-screen text in news programmes (such as subtitled foreign language segments) is a key concern for audiences with sight loss⁶¹. More broadly, our research has previously found ‘*trusted and accurate UK news*’ to be one of the most important attributes of Public Service Broadcasters to audiences⁶². So our proposed guidelines place a particular emphasis on making on-screen text in news programmes accessible, for example via dubbing foreign language speech or presenters reading out on-screen text.
- 6.11 While the alternative features described in this section are not commonly used by UK providers, we encourage providers to consider these options for certain types of programming.

Additional changes

- 6.12 Along with the changes outlined in the key discussion areas above, we are proposing some additional changes across the different areas of the audio description guidance. Table 2 in Annex 1 sets out a summary of the changes we are proposing including additional changes not described above with brief explanations/ relevant context. Our full existing guidelines can be found [here](#) and proposed guidelines are included in [Annex 9](#).

⁵⁹ ITV have explored the use of audio introductions as a place to provide additional diversity information (see their [Trigger Point character introductions](#)).

⁶⁰ *Extended AD* involves pausing the video and main audio track to include additional description before the programme is resumed. For example, see the Valuable 500’s [The Story so Far](#) film.

⁶¹ See RNIB’s [response](#) to our further on-demand accessibility consultation, page 4.

⁶² [Ofcom Public Service Media Tracker 2021](#). When respondents were asked to consider what are the most important elements of PSB to society, trusted and accurate UK news was chosen as the most important (15%). Our methodology used a MaxDiff approach, whereby consumers were asked to indicate the ‘most important’ and ‘least important’ options in each of a series of 16 randomly generated sets of five options. By using a ‘trade-off’ approach, we can determine relative importance scores for each attribute, adding up to 100 overall. This question was asked of all respondents who completed the survey online, excluding those who completed over the telephone.

Consultation questions on audio description:

9: Do you have any comments on the following suggested changes relating to audio description? Please provide any additional evidence that you think we should take into account.

- Approaches to/ styles of audio description
- Describing visual features
- Describing information about diversity characteristics
- Additional audio accessibility features

10: Do you have any comments about the other proposed changes to the audio description guidelines, as summarised in Table 2 (Annex 1)?

11: Is there anything additional that you think should be added to the revised guidelines on audio description?

7. Signing Guidelines

- 7.1 This section sets out key issues for consideration and our main proposed changes to the signing section in the best practice guidelines. Annex 1 sets out a comprehensive summary of all proposed changes.

Meeting the signing requirements

Proposed change: Emphasise that BSL should be default language to meet the signing targets, removing reference to Makaton and sign-supported English as alternatives, but clarifying that Irish Sign Language may be used for relevant audiences.

- 7.2 Currently, our guidelines state that BSL should be the default language for meeting the broadcast signing quotas⁶³. However, we also state that broadcasters may use Makaton or Sign-supported English if disability groups support this.
- 7.3 While we are not aware of any broadcasters using Makaton or Sign-supported English to meet the targets, our more recent information and conversations suggest this would not be appropriate. Charities point out that Makaton is a communication tool for people with learning or communication difficulties, rather than a *sign-language* for d/Deaf people. More generally, the British Deaf Association has raised concerns about hearing people's confusion between, and conflation of, sign-supported systems and BSL.⁶⁴
- 7.4 The legal framework sets out the broadcasters need to provide sign-language on a certain proportion of their programming.⁶⁵ While BSL is a distinct language with its own grammatical structure recognised by the UK Government⁶⁶, both sign-supported English and Makaton are sign-systems designed to support English speech.⁶⁷ Therefore, while we plan to encourage broadcasters to consider using such systems voluntarily e.g. for programmes aimed at those with communication difficulties or those who have become deaf later in life (see 3.6 of the proposed guidelines), we do not consider that they should contribute to the sign-language targets.
- 7.5 BSL has been recognised in law as a minority language in England, Wales and Scotland, and both BSL and Irish-Sign-Language have been formally recognised as minority languages in Northern Ireland. While BSL is used by the majority of deaf people in Northern Ireland (approximately 3,500), Irish-Sign-Language is also used by 1,500 deaf people⁶⁸. Therefore, we consider that Irish Sign-Language may also be used to meet the statutory targets for audiences in Northern Ireland.

⁶³ See the [TV Access Services Code](#) for more detail on the signing requirements

⁶⁴ For example, see the British Deaf Association's [statement on 'sign systems' and the oppression of BSL](#)

⁶⁵ See Section 303(5) of [the Communications Act](#)

⁶⁶ See the [2022 British Sign Language Act](#).

⁶⁷ For more information on sign-systems, see the National Deaf Children's society's website page [What is a sign system](#)

⁶⁸ See the [Department of Communities Northern Ireland website page](#)

Selection and scheduling of programming

Key proposed change: Specify that providers should consult their audiences when determining whether, and on which programmes, to provide sign-interpretation or sign-presentation. We also note that sign-interpretation may be particularly important on news and current affairs programming.

- 7.6 Under the broadcast accessibility requirements, television broadcasters with the largest audiences currently have to provide 5% of their content with sign-interpretation⁶⁹, while other non-exempted broadcasters with smaller audiences have the option instead to provide sign-presented content⁷⁰ or contribute to alternative arrangements (e.g. funding the British Sign Language Broadcasting Trust⁷¹). However, in our 2021 [recommendations](#) to Government on the form of on-demand regulations, we said that VoD providers should have a choice of providing sign-interpretation, sign-presentation or funding an approved provider of sign-presented programming, taking account of our best practice guidelines. Once the regulations are confirmed (2.2) we expect to consult on an on-demand accessibility code setting out how the signing arrangements will work in practice.
- 7.7 We understand that there are audience benefits to both sign-interpreted and sign-presented programming. Sign-interpretation allows people to enjoy popular programming made in other languages including English, while sign-presentation allows Deaf people to see their culture and community reflected on-screen. In 2021, we carried out an [online survey](#) among BSL users on their preferences for signing on TV and on-demand services. While the results from this survey are indicative only⁷², we found that sign-presentation was preferred to sign-interpretation across all genres, although this was less pronounced for news and current affairs. We intend to explore preferences for signing across different genres further in our qualitative research.
- 7.8 We do not think our guidelines should specify whether VoD providers should offer sign-interpretation or sign-presentation, given that audience preferences can differ and vary by service. At this stage, we propose that providers should consult their audiences when deciding which option to provide and on which programmes, but that sign-interpretation may be particularly important for news and current affairs programming or programmes on catch up services which have carried sign-interpretation when broadcast.

Proposed retention: Encouragement to provide sign-presented children's programming

- 7.9 Our current guidelines state that young deaf children who are learning sign language find it easier to understand and enjoy programmes presented in sign language, than those

⁶⁹ Sign-interpretation is when a signer visible on one side of the screen translates a programme into sign-language (e.g. on national news).

⁷⁰ Sign-presentation is when programmes are presented entirely in sign-language (i.e. all the presenters or characters on screen use sign-language).

⁷¹ The BSLBT commissions and distributes programmes made in British Sign Language (both on its website and through three weekly hour-long slots on Film 4 and Together TV)

⁷² The sample size is limited and not representative of BSL users in the UK. See our [Survey on TV viewing among BSL users](#), page 1 for more detail.

interpreted into sign language. We have not received any feedback suggesting this guidance is no longer appropriate, so our initial view is to retain it. However, we welcome views/ evidence on use and preferences for different types of signed programming among d/Deaf children.

Proposed change: Providers should schedule relevant programming for when sign-language users are likely to be watching, avoiding the early hours of the morning as far as possible.

7.10 We know that there are some concerns about BSL content being broadcast in the early hours of the morning, which can be particularly frustrating for BSL users without access to on-demand services. In our [TV Access services code](#), we acknowledge that signed television programmes meeting the targets may need to be shown outside peak viewing hours given that signing is generally only provided in open format (i.e. it cannot currently be turned on or off by the user). Nevertheless, we think broadcasters should do what they can to avoid scheduling programmes at times when sign-language users are unlikely to be watching as this detracts from the benefits of providing such programming.

Proposed change: Encourage providers to include representation of BSL within programmes with a broader audience.

7.11 Charities have also said that providers should consider how they can integrate BSL-using people within programming reaching a broader audience, citing Rose Ayling-Ellis' appearance on *Strictly Come Dancing* as a positive example of this. While such programming would not contribute to the statutory targets, we agree that it is important for the Deaf community to see their language represented in popular programming.

Quality of signed programmes

7.12 There is very little existing research on the views of BSL users on the quality of signed programmes.⁷³ While the findings are indicative only, our [survey on signing among BSL users](#) found that respondents felt there was room for improvement in the quality of both sign-interpreted and sign-presented programmes on TV (just over 6 in 10 were satisfied with the quality of sign-interpretation and half with the quality of sign-presentation). In our qualitative research, we plan to explore perceptions of quality, and what may be the drivers behind these views. We also welcome further views/ evidence from consultation respondents.

Proposed addition: Make clear that sign-interpretation should be accurate, easy to understand and emotionally reflect the content by portraying the speaker's intonations.

7.13 In relation to sign-interpreted programmes, the existing guidance states that signing should be synchronised with the speech as far as possible, and the signer should use appropriate techniques to indicate whose speech is being interpreted and draw attention to significant sound effects. Following stakeholder feedback, we propose to add that the

⁷³ Traverse's [report to the British Sign Language Broadcasting Trust in 2019](#) found that there is limited recent and robust research on Deaf people's views on television broadcasting.

sign-interpreter should also ensure their translations are accurate and easy to understand and emotionally reflect the content by portraying the speaker's intonations.

Proposed addition: When determining the size of the signer, providers should also take account of the various platforms on which the content will be played out.

- 7.14 In determining what size the signer is shown onscreen, there is a potential trade-off between ensuring that the signer is large enough so that their hands and facial expressions are clearly seen, while also not obscuring important visuals in the main picture. Our current guidance states that the signer should appear on the right-hand side of the screen and take up at least 1/6 of the area of a television screen. This recommendation was supported when we last consulted on the guidelines and we have not received any evidence to suggest that this size is too large/ small. However, we welcome views on whether this guidance remains appropriate for television screens.
- 7.15 We recognise that the ideal size of the signer may vary according to the screen through which the programme is viewed (e.g. as with subtitles, a proportionally larger signer might be preferable on a smaller mobile phone screen). Therefore, we plan to advise providers to take account of the various platforms on which content will be played out when determining the size/position of the signer.

Proposed addition: People using sign-language in programmes should be clearly in shot, including when sign-language users appear in programmes made primarily in English/ other languages.

- 7.16 We have heard concerns that sign-language users are not always clearly in shot when they are using sign-language in programmes made primarily in English (and when any sign-interpreter may have paused their interpretation). Therefore, we plan to make clear in our guidance that people using sign-language in programmes should be clearly in view.

Additional changes

- 7.17 Along with the changes outlined in the key discussion areas above, we are proposing some additional changes across the different areas of the signing guidance. Table 3 in Annex 1 sets out a summary of the changes we are proposing, including additional changes not described above with brief explanations/ relevant context. Our existing guidelines can be found [here](#) and our proposed guidelines are included in [Annex 9](#).

Consultation questions on signing:

12: Do you have any comments on the following suggested changes relating to signing?

- Meeting the signing requirements
- Selection/ scheduling of signed programmes
- Use and preferences for different types of signed programmes among d/Deaf children
- Ensuring the quality of sign-interpretation
- Size of sign interpreter image

13: Do you have any comments about the other proposed changes to the signing guidelines, as summarised in Table 3 (Annex 1)?

14: Is there anything additional that you think should be added to the revised guidelines on signing?

A1: Summary of proposed changes to the subtitling, audio description and signing guidelines

- A1.1 These tables set out a summary of proposed changes to the guidance on subtitling, audio description and signing in the best practice guidelines, including changes not described in the sections above. Where a change is discussed above, we give a paragraph reference in the final column. Where there is no such reference this is an additional change not discussed above.
- A1.2 These tables provide a summary of changes, rather than describing every change in wording and advice. For example, ‘retaining’ existing guidance means that we suggest keeping the substantive intent of the existing guidance, rather than the precise wording.

Table 1: Summary of proposed changes to subtitling guidelines, including additional changes not described in Section 5.

Topic	Current Guidance	Proposed Changes	Explanation/ Context
Audiences	<ul style="list-style-type: none"> People using subtitling have varying degrees of hearing loss. Some people whose first language is BSL are less fluent in English People are likely to lip read to a degree 	<ul style="list-style-type: none"> Retain 	<ul style="list-style-type: none"> Audiences have different experiences/needs, e.g. Ofcom’s 2021 survey among BSL users suggests that some deaf people find it difficult to follow subtitles.⁷⁴ We intend to explore the use of subtitling by people with cognitive impairments in our research
	<ul style="list-style-type: none"> Subtitle users have varying needs, but these guidelines reflect generally accepted practice 	<ul style="list-style-type: none"> Add that broadcasters need to bear in mind the target audience 	<ul style="list-style-type: none"> The guidelines are not prescriptive rules: broadcasters may wish to tailor provision

⁷⁴ See Question 5 of [Ofcom’s 2021 online survey among BSL users](#) which found that, when asked about whether they could follow TV programmes with subtitles only and no sign-interpretation, one in ten said they were unable to follow TV programmes with subtitles only. More than four in ten said they could follow programmes with subtitles only but with some difficulty and a similar proportion said they could follow programmes easily with subtitles only.

Topic	Current Guidance	Proposed Changes	Explanation/ Context
			to particular audience groups (e.g. with lower literacy levels)
Programme Selection/ Scheduling	<ul style="list-style-type: none"> Broadcasters with limited quotas should prioritise the most popular programmes while those with higher quotas should subtitle a range of programmes. 	<ul style="list-style-type: none"> Remove references to quotas Retain that providers should subtitle a range of programming including popular programming. Add that this should include programming of particular interest to the Deaf community 	<ul style="list-style-type: none"> Most broadcasters subject to quotas now have 80% or higher targets⁷⁵ Charities have suggested that broadcasters should ensure that programming of particular interest to the Deaf community is subtitled.
Accuracy	<ul style="list-style-type: none"> Subtitles should be as accurate as possible, including for children developing literacy skills 	<ul style="list-style-type: none"> Add that subtitlers should not unnecessarily censor the content (e.g. removing swear words), but it may be appropriate to remove some filler words (e.g. umms/errs) which do not carry meaning. 	<ul style="list-style-type: none"> See 5.4
	<ul style="list-style-type: none"> Broadcasters should ensure that subtitles for pre-recorded programmes are reviewed for accuracy before transmission 	<ul style="list-style-type: none"> Remove 	<ul style="list-style-type: none"> The proposed guidelines already include guidance on monitoring for quality (see 6.1-6.3)

⁷⁵ See our latest [access services data report](#).

Topic	Current Guidance	Proposed Changes	Explanation/ Context
Speed/ Synchronicity	<ul style="list-style-type: none"> Subtitles should not normally exceed 160-180 words per minute (wpm) on pre-recorded programmes and subtitles faster than 200 wpm are difficult to follow on live subtitles. 	<ul style="list-style-type: none"> Replace with guidance that subtitles should be synchronized with the audio as closely as possible. 	<ul style="list-style-type: none"> See 5.2-5.4
	<ul style="list-style-type: none"> Subtitle appearance should coincide with speech onset and disappearance should coincide roughly with the end of the speech segment – subtitles should not over run shot changes. 	<ul style="list-style-type: none"> Remove 	<ul style="list-style-type: none"> Covered by guidance that subtitles should be synchronized with the speech
	<ul style="list-style-type: none"> Slower, non-verbatim subtitling may be appropriate for young children 	<ul style="list-style-type: none"> Replace with guidance that broadcasters should bear in mind the intended audiences and that some people have lower reading speeds (i.e. some children, Deaf people and people with cognitive impairments) 	<ul style="list-style-type: none"> See 5.5-5.6
Accuracy and synchronicity in live subtitles	<ul style="list-style-type: none"> Maximum latency⁷⁶ in live subtitling should be three seconds. 	<ul style="list-style-type: none"> Replace with aim for average (mean) live subtitling latency to be no more than 4.5 seconds. 	<ul style="list-style-type: none"> See 5.7-5.10

⁷⁶ Delay between the subtitles and the speech

Topic	Current Guidance	Proposed Changes	Explanation/ Context
	<ul style="list-style-type: none"> For live subtitling, scripted material should be obtained and special vocabulary prepared. 	<ul style="list-style-type: none"> Add that providers should maximise use of pre-prepared block subtitles in live programmes and where possible make use of switchable delays.⁷⁷ 	<ul style="list-style-type: none"> See 5.11
	<ul style="list-style-type: none"> Live subtitles should flow continuously and smoothly 	<ul style="list-style-type: none"> Remove 	<ul style="list-style-type: none"> To focus on key principle that subtitles should be synchronised with the audio as far as possible.
	<ul style="list-style-type: none"> Subtitling for repeated programmes first broadcast live should be reviewed and edited if necessary. 	<ul style="list-style-type: none"> Retain 	<ul style="list-style-type: none"> We understand that subtitle users are frustrated with unedited subtitling on catch-up versions of live programming.
Sound effects and music	<ul style="list-style-type: none"> Subtitles should clearly describe non-speech information, such as the mood of music and words of songs (using the # sign to precede and conclude music), louder speech (using capital letters), inaudible mutters, incoherent shouts and long speechless pauses in programmes. 	<ul style="list-style-type: none"> Retain that relevant sound effects should be described, but remove specific guidance on how to indicate (e.g. the # sign for music/ capital letters for louder speech) Add that descriptions should be specific, with subtitlers encouraged to use their creativity. 	<ul style="list-style-type: none"> See 5.15 and 5.19

⁷⁷ i.e. allowing subtitles (but not audio or video) to shortcut delays inherent in the coding, multiplexing and playout processes).

Topic	Current Guidance	Proposed Changes	Explanation/ Context
	<ul style="list-style-type: none"> Italics or punctuation marks may be used to indicate emphasis. Subtitles should be displayed horizontally in the direction of any sound effects 	<ul style="list-style-type: none"> Remove 	<ul style="list-style-type: none"> Reflects our aim to take a principles-based approach
Indicating speakers	<ul style="list-style-type: none"> Different colours should be used to indicate different speakers. 	<ul style="list-style-type: none"> Replace with guidance that speakers should be clearly identified (e.g. by colours/ punctuation/ positioning) 	<ul style="list-style-type: none"> See 5.14
	<ul style="list-style-type: none"> Subtitles should identify the source of speech where not apparent 	<ul style="list-style-type: none"> Retain 	<ul style="list-style-type: none"> Important for ensuring the source of speech is clearly identified where it would be known to a hearing audience.
Presentation	<ul style="list-style-type: none"> Subtitling should use the Tiresias Screen Font and subtitles on standard definition DTT services should be no less than 20 television lines for the capital 'V'. Subtitles should be placed within the 'safe caption' area of a 14:9 display and normally occupy the bottom of the screen Recommended colours are white, yellow, cyan and green against a solid black background. 	<ul style="list-style-type: none"> Replace with guidance that subtitles should be easy to read, clearly visible against the background and positioned to avoid obscuring the speaker's mouth/ other vital information. When determining the size/ position, providers should take account of the various platforms on which the content will be played out Add that we encourage providers to consider customisation options in subtitle presentation. 	<ul style="list-style-type: none"> See 5.12-5.13 and 5.16-5.18

Topic	Current Guidance	Proposed Changes	Explanation/ Context
	<ul style="list-style-type: none"> Encourage use of antialiasing techniques 	<ul style="list-style-type: none"> Retain 	<ul style="list-style-type: none"> We understand that antialiasing techniques are commonly used to make the appearance of subtitles clearer.
	<ul style="list-style-type: none"> Pre-recorded block subtitles should be used for pre-recorded programmes. 	<ul style="list-style-type: none"> Add that block subtitles should also be used in live subtitling where possible 	<ul style="list-style-type: none"> Research suggests that people find block subtitles easier to read.⁷⁸
	<ul style="list-style-type: none"> Subtitles should normally comprise a single sentence (no more than two lines unless three will not obscure the picture) and, if necessary, sentences should be broken/ reformed into more than one sentence at natural linguistic breaks. Where breaks occur, it should be clear there is more to come (e.g. by using a conjunction/ colon/ semi-colon or run of dots) and line breaks within a word should be avoided 	<ul style="list-style-type: none"> Replace with guidance that subtitles/ subtitle lines should be segmented at logical linguistic breaks. Footnote Section 3 of the BBC's subtitle guidelines for more detailed advice on subtitle line breaks. 	<ul style="list-style-type: none"> Reflects our aim to focus on key principles, while signposting to external sources.

⁷⁸ See for example paragraphs 3.30 – 3.33 of our [2014 statement on the quality of live subtitling](#).

Topic	Current Guidance	Proposed Changes	Explanation/ Context
Publicity	<ul style="list-style-type: none"> The word 'Subtitles' should be displayed on the screen at the start of the programme. 	<ul style="list-style-type: none"> Remove guidance 	<ul style="list-style-type: none"> Subtitled programming is already indicated through the EPG guide⁷⁹ or on-demand provider websites.
Language of subtitling		<ul style="list-style-type: none"> Add that subtitles should be made in the same language as the intended audience of the main spoken language of the programme 	<ul style="list-style-type: none"> See 5.20
Other features		<ul style="list-style-type: none"> Add that we encourage providers to consider enhancing dialogue audibility and/or providing options to customise sound levels in programmes where possible 	<ul style="list-style-type: none"> See 4.15-4.16

⁷⁹ See Section 6 of the [TV Access Services Code](#)

Table 2: Summary of proposed changes to the audio description guidelines including additional changes not described in Section 6

Topic	Current Guidance	Proposed Changes	Explanation/ Context
Audiences	<ul style="list-style-type: none"> The majority of people with visual impairments experience the loss of some or all of their vision later in life Therefore, the majority of AD users will have some sight or had sight at some stage in their lives 	<ul style="list-style-type: none"> Add that people with cognitive impairments may use AD, for example it may help people with autism to identify emotions or support language acquisition 	<ul style="list-style-type: none"> Audience needs and preferences may vary depending on their level of impairment⁸⁰ See 4.3-4.4
Selection and scheduling of programming	<ul style="list-style-type: none"> Not all programmes suit audio description as some are too fast moving, offer little opportunity to insert description or may not be significantly enhanced by AD (e.g. quiz shows) 	<ul style="list-style-type: none"> Add that integrated description⁸¹ may be more appropriate for certain types of programming and should be considered as part of the commissioning and production process. Add that on-screen text in news programmes can be made more accessible, e.g. via dubbing or presenters reading out on-screen text 	<ul style="list-style-type: none"> See 6.8-6.11

⁸⁰ Research has indicated that there is a great diversity of opinions and preferences among AD users, which can vary according to factors such as age and degree of sight loss. A survey conducted for the enhancing audio description project found that 78% of AD users consider that AD should consider differences in audiences and preferences. Lopez, M., Kearney, G., & Hofstädter, K. (2018). Audio Description in the UK: What works, what doesn't, and understanding the need for personalising access. *British Journal of Visual Impairment*, 36(3), 274–291. <https://doi.org/10.1177/0264619618794750>

⁸¹ Small changes made to the main soundtrack to make it accessible e.g. reading out on-screen text in quiz shows.

Topic	Current Guidance	Proposed Changes	Explanation/ Context
Aims	<ul style="list-style-type: none"> AD should aim to enhance rather than distract from enjoyment of the programme. 	<ul style="list-style-type: none"> Add that AD should aim to offer an equivalent experience of the programme, in terms of both informing and entertaining audiences. 	<ul style="list-style-type: none"> To focus the guidelines on key outcomes for audiences, making clear that AD is not only about the provision of information, but about ensuring audiences’ enjoyment of the programme.
What to describe	<ul style="list-style-type: none"> AD should describe various aspects relevant to the plot e.g. characters, locations, time and circumstances, any sounds that are not readily identifiable, on-screen action, and on-screen information (plus more – see existing guidelines) 	<ul style="list-style-type: none"> Retain existing guidance on describing visual information relevant to the plot, with examples of what might be described rather than saying what ‘<i>should</i> be described’. Add that AD should also be sensitive to other visual features beyond those directly relevant to the plot, including diversity characteristics, but should avoid assuming default characteristics 	<ul style="list-style-type: none"> See 6.5-6.7
	<ul style="list-style-type: none"> AD should generally avoid describing over the main soundtrack or revealing plot details in advance 	<ul style="list-style-type: none"> Retain principles of avoiding describing over the main soundtrack or revealing plot details in advance 	<ul style="list-style-type: none"> Research has suggested that masking elements of the soundtrack is a main source of dislike for AD users.⁸²

⁸² See López, M., Kearney, G., & Hofstädter, K. (2018). Audio Description in the UK: What works, what doesn’t, and understanding the need for personalising access. *British Journal of Visual Impairment*, 36(3), 274–291. <https://doi.org/10.1177/0264619618794750>

Topic	Current Guidance	Proposed Changes	Explanation/ Context
	<ul style="list-style-type: none"> AD should not censor what is on screen. It should not generally be necessary to use offensive language 	<ul style="list-style-type: none"> Retain guidance that AD should not censor information Remove guidance on avoiding offensive language 	<ul style="list-style-type: none"> The AD should provide an equivalent experience – we have no evidence to suggest that AD users should be excluded from engaging with more ‘sensitive’ topics such as violence or sexual content.
Language of the AD		<ul style="list-style-type: none"> Add that AD should be in the language used by the programme’s intended audience for its spoken language 	<ul style="list-style-type: none"> This is important for providing disabled audiences with equivalent access to the content as the broader intended audience
Use of Language	<ul style="list-style-type: none"> AD should use different forms of the present tense and a variety of verbs. Adverbs should not be subjective ‘Filming’ terms such as camera angles should not be used 	<ul style="list-style-type: none"> Remove 	<ul style="list-style-type: none"> We aim to avoid overly specific guidance on language – research suggests that some people with sight loss respond positively to the use of cinematic language.⁸³
Audio introductions and extended AD		<ul style="list-style-type: none"> Add that audio introductions and extended AD⁸⁴ can enable additional description to be provided when there is limited space available in the main soundtrack 	<ul style="list-style-type: none"> See 6.6

⁸³ Louise Fryer & Jonathan Freeman (2013) Cinematic language and the description of film: keeping AD users in the frame, Perspectives, 21:3, 412-426, DOI: 10.1080/0907676X.2012.693108

⁸⁴ Extended AD involves pausing the video and main audio track to include additional description before the programme is resumed

Topic	Current Guidance	Proposed Changes	Explanation/ Context
		<ul style="list-style-type: none"> • Add encouragement to clearly signpost the availability of audio introductions or extended AD 	
<p>Clarity and audibility of AD</p>	<ul style="list-style-type: none"> • Descriptions should be accurate and easy to understand 	<ul style="list-style-type: none"> • Add that it should be easy to hear both the AD and main soundtrack, and that customisation options may allow audiences to adjust the sound levels to match their preferences • Add that AD should be accessible through the same audio systems as the main soundtrack e.g. surround sound 	<ul style="list-style-type: none"> • The RNIB has told us that audiences have reported issues with the sound quality and balance between the AD and main soundtrack. • Developments in object-based audio⁸⁵ may allow for the development of customisation options for example with audio description sound levels.
<p>Style of AD</p>	<ul style="list-style-type: none"> • Delivery should be impersonal in style, while also matching the programme genre. 	<ul style="list-style-type: none"> • Retain that providers should adapt AD for the given genre/ audience (taking account of feedback) but remove guidance on using an impersonal style. 	<ul style="list-style-type: none"> • See 6.2-6.4
	<ul style="list-style-type: none"> • Language and pace of delivery for children’s TV need particular care, having regard to the age and background of the target audience, as well as feedback from children and their parents. A more intimate style may be appropriate. 	<ul style="list-style-type: none"> • Retain that language and style for children’s programming should be engaging and age appropriate, but remove reference to feedback 	<ul style="list-style-type: none"> • Importance of seeking feedback is already emphasized more generally in relation to style of AD

⁸⁵ For more information on developments in technology relating to customisation, see Macroblock Ltd. and the School of Digital Arts’ report for Ofcom on [object-based broadcasting](#)

Topic	Current Guidance	Proposed Changes	Explanation/ Context
Describers	<ul style="list-style-type: none"> • Describers should be chosen to fit the genre, the nature of the programme and the intended audience • Ideally, the same describers should describe a full series of programmes 	<ul style="list-style-type: none"> • Retain existing guidance 	<ul style="list-style-type: none"> • While providers tell us it is not always practical for the same describer(s) to voice all episodes of a series, we understand that AD users consider this important in providing continuity of experience. So we encourage providers to use the same describer as far as practical.
Product placement	<ul style="list-style-type: none"> • Where a programme is signalled on screen as containing product placement, the audio description should say “this programme contains product placement”. However, this information should not intrude in the normal audio description; it is paramount that the audio description first and foremost fulfils its primary function of making the programme itself accessible. 	<ul style="list-style-type: none"> • Replace with a broader principle, that where a programme is accessible, providers should make every effort to ensure that important on-screen information is accessible 	<ul style="list-style-type: none"> • See 4.31

Table 3: Summary of proposed changes to the signing guidelines including additional changes not described in Section 7

Topic	Current Guidance	Proposed Changes	Explanation/ Context
What is sign-language	<ul style="list-style-type: none"> • Sign-language uses hand gestures, body language and facial expressions to convey meaning. BSL is the most common form of sign-language in the UK and is a distinct language recognised by the UK Government. • Sign Supported English and Makaton are also used in the UK 	<ul style="list-style-type: none"> • Add that there are many regional dialects of BSL and that Irish Sign Language is used by some in Northern Ireland. • Remove references to sign-supported English and Makaton as sign-languages. 	<ul style="list-style-type: none"> • See 7.2-7.5
Meeting the signing targets	<ul style="list-style-type: none"> • BSL should be the default language to meet the signing targets, but Makaton or Sign-supported English may also be used 	<ul style="list-style-type: none"> • Remove references to Makaton or sign-supported English but state that Irish Sign Language may be used 	<ul style="list-style-type: none"> • See 7.2-7.5
Audiences	<ul style="list-style-type: none"> • Some people who are deaf or have significant hearing impairments use BSL as their preferred form of communication. • Young deaf children, in particular, may not yet be 	<ul style="list-style-type: none"> • Add that subtitling is not a substitute for sign-language: for many Deaf people BSL is their first language and Deaf people have varying levels of fluency in English. 	<ul style="list-style-type: none"> • Our 2021 survey among BSL users found that around eight in ten respondents rely on sign-interpretation to some degree to follow TV programmes

Topic	Current Guidance	Proposed Changes	Explanation/ Context
	<p>literate in English and may rely on sign-language to understand and enjoy children’s programming.</p>	<ul style="list-style-type: none"> • Add that sign-language is also used more widely, including by family members of deaf people and professional BSL users. 	
<p>Selection and scheduling of programming</p>	<ul style="list-style-type: none"> • Sign language users particularly appreciate sign-presented programmes 	<ul style="list-style-type: none"> • Replace with guidance that providers should consult their audiences when deciding whether to provide sign-interpretation, sign-presentation or a mix of both. • Add that sign-interpretation may be particularly important for news and current affairs programmes or catchup programmes that have been signed on TV • Add that providers should integrate representation of BSL-using people in programming made primarily in other languages including English • Add that providers should schedule relevant programming for when sign-language users are likely to be watching 	<ul style="list-style-type: none"> • See 7.6-7.11

Topic	Current Guidance	Proposed Changes	Explanation/ Context
	<ul style="list-style-type: none"> Young deaf children who are learning sign language find it easier to understand and enjoy programmes presented in sign language than those interpreted into sign language. 	<ul style="list-style-type: none"> Retain 	<ul style="list-style-type: none"> We welcome stakeholder views on whether to retain this – see 7.9
Synchronicity of sign-interpretation	<ul style="list-style-type: none"> Sign-interpretation, and voice overs of signed programmes, should be synchronised as far as possible with the original speech/ sign-language. 	<ul style="list-style-type: none"> Retain 	<ul style="list-style-type: none"> See 7.13
Accuracy of sign-interpretation	<ul style="list-style-type: none"> Signers should use appropriate techniques to indicate whose speech he or she is interpreting, and to draw attention to significant sound effects. 	<ul style="list-style-type: none"> Add that sign-interpretation should be accurate and easy to understand and that interpreters should emotionally reflect the content by portraying the speaker’s intonations. 	<ul style="list-style-type: none"> See 7.13-7.14
Subtitling	<ul style="list-style-type: none"> Signed programmes should be subtitled. 	<ul style="list-style-type: none"> Retain 	<ul style="list-style-type: none"> To support people using both signing and subtitling
Qualifications	<ul style="list-style-type: none"> Sign language presenters, reporters and interpreters should be appropriately 	<ul style="list-style-type: none"> Reduce to sign-language interpreters and presenters should be appropriately qualified, both to use sign 	<ul style="list-style-type: none"> To focus on key principles, avoiding overly specific guidance

Topic	Current Guidance	Proposed Changes	Explanation/ Context
	<p>qualified, both to use sign language of native competency and to communicate effectively through television. Some latitude is allowed for guests and interviewees though broadcasters should ensure that they are understandable.</p>	<p>language of native competency and to communicate effectively through television.</p>	
<p>Visibility of the signer</p>	<ul style="list-style-type: none"> The signer should use a style of clothing that is appropriate to the style of the programme: e.g. business-like clothing for news and current affairs and informal/ colourful clothing for children’s programmes. The signers’ clothing should allow them to be seen distinctly. 	<ul style="list-style-type: none"> Replace specific instructions on clothing with guidance that providers should be clearly visible against the background screen, for example by wearing clothing of contrasting colour. 	<ul style="list-style-type: none"> To focus on key principles, avoiding overly specific guidance.
	<ul style="list-style-type: none"> The signer should generally appear on the right-hand side of the screen and occupy a space no smaller than one sixth of the picture. 	<ul style="list-style-type: none"> Add that interpreters should be large enough for their facial expressions and hand gestures to be easy to understand, while not obscuring key information on screen. 	<ul style="list-style-type: none"> See 7.13-7.15

Topic	Current Guidance	Proposed Changes	Explanation/ Context
		<ul style="list-style-type: none"> • Add that providers should take account of the various platforms on which content will be played out when determining the size/ position of the signer 	
		<ul style="list-style-type: none"> • Add that people using sign-language in programmes should be clearly in shot, including when sign-language users appear in programmes made primarily in English/ other languages 	<ul style="list-style-type: none"> • See 7.16
Delivery	<ul style="list-style-type: none"> • Different delivery methods are permissible provided that signing is available to all viewers without the need to purchase special equipment. For example, broadcasters should not use IPTV to provide signed programmes, unless viewers had the necessary equipment or were provided with it free-of-charge. 	<ul style="list-style-type: none"> • Remove 	<ul style="list-style-type: none"> • The targets apply across all means of delivery which is set out in the TV access services code (see 4.4 of the draft TV access services code)

A2. Equality Impact Assessment

- A2.1 We have given careful consideration to whether our suggested changes to the Code and guidelines will have a particular impact on persons sharing protected characteristics (broadly including race, age, disability, sex, sexual orientation, gender reassignment, pregnancy and maternity, marriage and civil partnership and religion or belief in the UK and also dependents and political opinion in Northern Ireland), and in particular whether they may discriminate against such persons or impact on equality of opportunity or good relations. This assessment helps us comply with our duties under the Equality Act 2010 and the Northern Ireland Act 1998. (Further detail is set out in section 149 of the Equality Act 2010 and section 75 of the Northern Ireland Act 1998).
- A2.2 We do not look specifically at our duties under the Welsh Language (Wales) Measure 2011 in this assessment as we consider that the exception for broadcasting (including access services) applies.⁸⁶ However, we note our proposals to state that subtitling and AD should be in the language used by the programme's intended audience for its spoken language (e.g. Welsh language programming should be subtitled in Welsh).
- A2.3 We have not identified any likely adverse impacts on people with any of the protected characteristics.
- A2.4 Our overarching aim in making these changes is to increase the usefulness of access services to disabled audiences.
- A2.5 Therefore we consider that our proposals may have greater (and positive) implications for the following equality groups:
- a) people with disabilities
 - b) people whose age-related conditions may make them more vulnerable (who we consider under the protected characteristic of 'age')
 - c) people belonging to these or other equality groups to the extent that those people use access services for reasons other than sight or hearing impairment.
- A2.6 There are a number of ways in which we believe that our proposed changes to the guidelines are likely to be beneficial to the above equality groups. Some examples of these are detailed below.
- A2.7 We have expanded our guidelines to better include people with cognitive disabilities, and encourage providers to consider the benefit and use of access services by these groups in their programming.
- A2.8 Whilst our current guidelines give advice to broadcasters, we also strengthen our messaging that our proposed guidelines should not be used in isolation and that providers

⁸⁶ See Exception for Broadcasting in the Welsh Language (Wales) Measure 2011, Part 4, Chapter 9 (67).

also need to consult with their audiences/charities representing audiences in order to ensure that they effectively deliver for them.

- A2.9 There has been a clear increase in the popularity of on-demand services in recent years⁸⁷. Therefore, we expect the expansion of our best practice guidelines on TV access services to include advice for providers of video on-demand services on ensuring the quality and usability of their access services to result in increased fulfilment and inclusion in society by the aforementioned equality groups.
- A2.10 We believe that the shift in our guidelines from focusing on means of delivering key outcomes, to encouraging broadcasters and service providers to focus on a range of key outcomes for audiences, will result in more creative and impactful accessible content. Our proposals take account of initial conversations with charities and findings from existing research. In addition, we have commissioned qualitative research with audiences to ensure that our guidelines take into account their expectations and preferences.

⁸⁷ Average minutes of viewing by all individuals (aged 4+) to subscription VoD and broadcaster VoD services has increased from 27 minutes per day in 2017 to 73 minutes per day in 2021. Ofcom estimates of total audio-video viewing. Modelled from BARB, Comscore and TouchPoints data. See [Ofcom's Media Nations: UK report 2022](#), Figure 27 (page 50).

A3. Proposed list of external sources

A3.1 As set out at 4.49- 4.51, we are proposing to refer to external sources in relation to accessibility best practice on our website. We set out below an initial list for comment.

- Ability Net's [website](#)
- The [ADLAB](#) project, including [publications](#) page
- The [Audio Description Association](#)
- BBC's [Accessibility for Products](#) section of its website
- BBC's [Mobile Accessibility Guidelines](#)
- BBC's Research and Development section of its website: [Accessibility topic](#)
- BBC's [Subtitle Guidelines](#)
- British Deaf Association's [website](#), including [Help and Resources](#) on sign-language.
- [British Sign Language Broadcasting Trust](#) including [research](#) pages
- Committee of Advertising Practice (CAP) [statement](#) on accessibility of advertisements and [guidance on use of superimposed text in television advertising](#)
- Communications Consumer Panel's [website](#), including its [access to Broadcast and On-Demand Content report](#) (2017) and think piece on [Making Communications Services Inclusive and Accessible](#) (2021)
- EASIT project [website](#)
- [Galician Observatory for Media Accessibility](#), including information on the [NER Model](#)
- Enhancing Audio Description Project [website](#)
- European Blind Union's Part One of the Handbook for High Quality Audio Description on Screen, available on the [Access to Art and Culture](#) section of their website
- Macroblock Ltd. and the School of Digital Arts' report for Ofcom on [object-based broadcasting](#)
- Netflix' [Audio Description Style Guide v2.5](#)
- Netflix' [English Timed Text style guide](#)
- Ofcom's [Diversity in Broadcasting Hub](#)
- Ofcom's [survey on TV viewing among BSL users](#) (2021)
- Penny's article on [Strategy and Language to tackle diversity in ITV's audio description](#)
- Romero-Fresco and Fryer's [Accessible film making guide](#)
- Royal National Institute of Blind People's [website](#), including [Key statistics about sight loss](#)

- Royal National Institute for Deaf People's [website](#), including [Facts and figures on hearing loss and tinnitus](#)
- Royal National Institute for Deaf People's [Subtitle It report](#) (2023)
- Scope's [website](#), including its article on [Accessible fonts and readability: the basics](#)
- Scope's [The Big Hack Survey on video-on-demand streaming and accessibility \(2020\)](#)
- Sense's [website](#), including [deafblindness statistics in the UK](#).
- The Makaton Charity's [website](#), including [About Makaton](#)
- Turn on the Subtitles' [website](#), including [summary of research](#) about subtitling and literacy
- UK Digital Television Group's [Usability and Accessibility Guidelines](#) ("U-Book")
- W3C's [Web Content Accessibility Guidelines](#)
- W3C's [Media Accessibility User Requirements](#)

A4. Responding to this consultation

How to respond

- A4.1 Ofcom would like to receive views and comments on the issues raised in this document, by 5pm on 21 September 2023.
- A4.2 You can download a response form from <https://www.ofcom.org.uk/consultations-and-statements/category-1/ensuring-the-quality-of-tv-and-on-demand-access-services>. You can return this by email or post to the address provided in the response form.
- A4.3 If your response is a large file, or has supporting charts, tables or other data, please email it to accessibility@ofcom.org.uk, as an attachment in Microsoft Word format, together with the cover sheet.
- A4.4 Responses may alternatively be posted to the address below, marked with the title of the consultation:
- Accessibility Team, Content Policy
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA
- A4.5 We welcome responses in formats other than print, for example an audio recording or a British Sign Language video. To respond in BSL:
- send us a recording of you signing your response. This should be no longer than 5 minutes. Suitable file formats are DVDs, wmv or QuickTime files; or
 - upload a video of you signing your response directly to YouTube (or another hosting site) and send us the link.
- A4.6 We will publish a transcript of any audio or video responses we receive (unless your response is confidential)
- A4.7 We do not need a paper copy of your response as well as an electronic version. We will acknowledge receipt of a response submitted to us by email.
- A4.8 You do not have to answer all the questions in the consultation if you do not have a view; a short response on just one point is fine. We also welcome joint responses.
- A4.9 It would be helpful if your response could include direct answers to the questions asked in the consultation document. The questions are listed at Annex 8. It would also help if you could explain why you hold your views, and what you think the effect of Ofcom's proposals would be.

A4.10 If you want to discuss the issues and questions raised in this consultation, please contact accessibility@ofcom.org.uk

Confidentiality

- A4.11 Consultations are more effective if we publish the responses before the consultation period closes. In particular, this can help people and organisations with limited resources or familiarity with the issues to respond in a more informed way. So, in the interests of transparency and good regulatory practice, and because we believe it is important that everyone who is interested in an issue can see other respondents' views, we usually publish responses on the Ofcom website at regular intervals during and after the consultation period.
- A4.12 If you think your response should be kept confidential, please specify which part(s) this applies to, and explain why. Please send any confidential sections as a separate annex. If you want your name, address, other contact details or job title to remain confidential, please provide them only in the cover sheet, so that we don't have to edit your response.
- A4.13 If someone asks us to keep part or all of a response confidential, we will treat this request seriously and try to respect it. But sometimes we will need to publish all responses, including those that are marked as confidential, in order to meet legal obligations.
- A4.14 To fulfil our pre-disclosure duty, we may share a copy of your response with the relevant government department before we publish it on our website. This is the Department for Business, Energy and Industrial Strategy (BEIS) for postal matters, and the Department for Culture, Media and Sport (DCMS) for all other matters.
- A4.15 Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Ofcom's intellectual property rights are explained further in our Terms of Use.

Next steps

- A4.16 Following this consultation period, Ofcom plans to publish a statement by early 2024.
- A4.17 If you wish, you can register to receive mail updates alerting you to new Ofcom publications.

Ofcom's consultation processes

- A4.18 Ofcom aims to make responding to a consultation as easy as possible. For more information, please see our consultation principles in Annex 6.
- A4.19 If you have any comments or suggestions on how we manage our consultations, please email us at consult@ofcom.org.uk. We particularly welcome ideas on how Ofcom could more effectively seek the views of groups or individuals, such as small businesses and residential consumers, who are less likely to give their opinions through a formal consultation.

A4.20 If you would like to discuss these issues, or Ofcom's consultation processes more generally, please contact the corporation secretary:

Corporation Secretary

Ofcom

Riverside House

2a Southwark Bridge Road

London SE1 9HA

Email: corporationsecretary@ofcom.org.uk

A5. Ofcom's consultation principles

Ofcom has seven principles that it follows for every public written consultation:

Before the consultation

- A5.1 Wherever possible, we will hold informal talks with people and organisations before announcing a big consultation, to find out whether we are thinking along the right lines. If we do not have enough time to do this, we will hold an open meeting to explain our proposals, shortly after announcing the consultation.

During the consultation

- A5.2 We will be clear about whom we are consulting, why, on what questions and for how long.
- A5.3 We will make the consultation document as short and simple as possible, with an overview of no more than two pages. We will try to make it as easy as possible for people to give us a written response.
- A5.4 We will consult for up to ten weeks, depending on the potential impact of our proposals.
- A5.5 A person within Ofcom will be in charge of making sure we follow our own guidelines and aim to reach the largest possible number of people and organisations who may be interested in the outcome of our decisions. Ofcom's Consultation Champion is the main person to contact if you have views on the way we run our consultations.
- A5.6 If we are not able to follow any of these seven principles, we will explain why.

After the consultation

- A5.7 We think it is important that everyone who is interested in an issue can see other people's views, so we usually publish the responses on our website at regular intervals during and after the consultation period. After the consultation we will make our decisions and publish a statement explaining what we are going to do, and why, showing how respondents' views helped to shape these decisions.

A6. Consultation coversheet

BASIC DETAILS

Consultation title:

To (Ofcom contact):

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing

Name/contact details/job title

Whole response

Organisation

Part of the response

If there is no separate annex, which parts? _____

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom aims to publish responses at regular intervals during and after the consultation period. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Signed (if hard copy)

A7. Consultation questions

A7.1 We welcome views and evidence on the questions below. It is not necessary to answer every question – please answer those on which you have a view.

Proposed approach and additions to Code

1: Do you have any comments on our proposed approach to making these changes?

2: Do you have any comments on our proposed additions to the TV Access Services Code?

Overarching best practice guidelines

3: Do you have any comments on any of the following proposed changes/additions? Please provide any additional evidence you think we should take into account.

- Understanding audiences
- Developing strategies
- Programme selection and scheduling
- National emergencies and important on-screen information
- Promoting awareness
- Accessibility and diversity in production
- Training
- Monitoring of quality

4: Do you have any views on how developments in technology may inform the production of access services in the coming years?

5: What do you think about the proposed list of external sources/ guidelines in Annex 3? Are there any additional sources which Ofcom should refer to?

Subtitles

6: Do you have any comments on the following suggested changes relating to subtitling? Please provide any additional evidence that you think we should take into account.

- Subtitling speeds
- Live programming
- Subtitling presentation
- Sound and music descriptions
- Language of subtitling

7: Do you have any comments about the other proposed changes to the subtitling guidelines, as summarised in Table 1 (Annex 1)?

8: Is there anything additional that you think should be added to the revised guidelines on subtitling?

Audio description

9: Do you have any comments on the following suggested changes relating to audio description? Please provide any additional evidence that you think we should take into account.

- Approaches to/ styles of audio description
- Describing visual features
- Describing information about diversity characteristics
- Additional audio accessibility features

10: Do you have any comments about the other proposed changes to the audio description guidelines, as summarised in Table 2 (Annex 1)?

11: Is there anything additional that you think should be added to the revised guidelines on audio description?

Signing

12: Do you have any comments on the following suggested changes relating to signing?

- Meeting the signing requirements
- Selection/ scheduling of signed programmes
- Use and preferences for different types of signed programmes among d/Deaf children
- Ensuring the quality of sign-interpretation
- Size of sign interpreter image

13: Do you have any comments about the other proposed changes to the signing guidelines, as summarised in Table 3 (Annex 1)?

14: Is there anything additional that you think should be added to the revised guidelines on signing?

The overview section in this document is a simplified high-level summary only. The proposals we are consulting on and our reasoning are set out in the full document.