
Ofcom's proposed Guidelines on Providing Television and On-Demand Access Services

Draft for consultation

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1. Introduction

- 1.1 Ofcom believes that TV and on-demand programming should provide an equally fulfilling experience for all audiences, regardless of disability. To this end, these guidelines set out recommendations for broadcasters and video-on-demand providers (collectively “providers”) on ensuring the quality of their access services (including subtitling, audio description and signing). These guidelines generally focus on key outcomes for audiences, rather than the precise means by which they are achieved, and so allow for the use of a range of different technologies (current and future).
- 1.2 We encourage all broadcasters and providers of video-on-demand services (“VoD providers”)¹ regulated by Ofcom to take account of these guidelines.
- 1.3 Broadcasters need to make sure their access services are of sufficient quality in order to meet the statutory targets (see 4.6-4.8 of the [\[draft\] TV access services code](#) for more detail).
- 1.4 These guidelines are not intended to be exhaustive or used in isolation. Audience preferences may differ by service and are likely to continue to evolve. Therefore, providers should regularly consult their audiences and/or groups representing disabled people to inform their provision. Links to further resources can also be found on our website.
- 1.5 This guidance is applicable to both broadcasters and VoD providers unless otherwise stated. Guidance relevant only to broadcast or VoD services is indicated in boxes.

¹ We have made available a list of notified [video on demand programme services](#).

2. Understanding Audiences

Audience groups

- 2.1 Access to television and VoD services is crucial for enabling full participation in social and cultural life, also playing a role in helping to combat loneliness.² People with sight and/ or hearing loss often rely on subtitles, audio description and/or signing to be able to enjoy TV and on-demand content. People including those who are deafblind (with sight and hearing loss) may benefit from more than one access service on a programme. The incidence of hearing and sight loss increases with age and so older people may be more likely to rely on access services.³
- 2.2 People with sight and hearing loss should be the primary focus in providing television access services to meet the statutory quotas.⁴ However, we also encourage broadcasters and VoD providers to make their programming more accessible to people with other disabilities.⁵ For example, people with cognitive, neurodevelopmental and complex disabilities⁶ may benefit from the provision of access services.
- 2.3 Providers also may wish to bear in mind the broader benefits for all viewers. For example, subtitles can be used to support comprehension of the dialogue when watching in noisy or public environments. A significant proportion of people without hearing loss use subtitles, particularly younger viewers.⁷ Some research also suggests that subtitles may help to improve literacy levels for children.⁸

Choice and customisation

- 2.4 The needs and preferences of disabled individuals are likely to differ, depending in part on the degree and nature of their disability. Therefore, where practical, we encourage providers to provide customisation options (for example in relation to the size and presentation of subtitles⁹) and choice for viewers (for example, by providing optional introductions to audio described programmes¹⁰). It is also generally preferable to offer 'closed' access services which can be turned on or off by the viewer depending on their needs.
- 2.5 Customisation options may add complexity to the user interface and so we encourage providers to ensure such services are easy to use by disabled audiences. The use of default

² For more information, see WaveLength's [About Loneliness](#)

³ For more information about sight and hearing loss, RNID's [Facts and figures on hearing loss and tinnitus](#), RNIB's [Key statistics about sight loss](#) and Sense's [Deafblindness statistics in the UK](#). For more information about the use of BSL by Deaf people, see the BDA's [Help and Resources](#) on sign-language.

⁴ See our [TV Access Services Code](#)

⁵ See Accessibility Action Plans section.

⁶ For more information on complex disabilities, see Sense's [statistics on complex disabilities in the UK](#).

⁷ For example this [YouGov survey](#) showed that 61% of 18-24s prefer to have the subtitles switched on.

⁸ See this [summary of research about subtitling and literacy by Turn on the Subtitles](#).

⁹ See subtitling section.

¹⁰ See audio introductions section.

or automatic settings (where accessibility requirements are remembered) may help with this.

3. Developing Strategies

Accessibility Action Plans

- 3.1 Ofcom encourages broadcasters and VoD providers to develop accessibility action plans with a view to continuously and progressively making their services more accessible to disabled people.¹¹ We remind providers that they are required to notify any such plans to Ofcom.¹²
- 3.2 The action plans should set out how providers intend to deliver progress in both the availability of accessibility features (such as subtitles, audio description and signing) and in their quality and usability for disabled people. Providers should engage with relevant audiences in identifying priorities for improvement and developing their plans.
- 3.3 The plans should include clearly defined and measurable goals against which providers can regularly track progress. We recommend senior management be involved in developing and agreeing the action plans and receive regular updates on progress (for example, through committees or steering groups where providers have these). Senior management should ensure that the plans are integrated with broader product development strategies so that accessibility considerations can be embedded from the start.

Amounts and types of access services

- 3.4 The statutory targets on required levels of subtitling, audio description and signing (set out in the TV Access Services Code) should be considered as minimum standards only. Ofcom encourages all broadcasters and VoD providers to increase their provision as far as is practicable. However, low quality access services can cause significant frustration to audiences, so providers should consider how best to balance their investment between quality and quantity of accessible programming.
- 3.5 We encourage both providers and content suppliers to include access service files as part of acquiring or selling content. This may help to reduce duplication of work across industry and increase the availability of accessible content for viewers.
- 3.6 Beyond provision of the required access services, we encourage providers to consider more broadly how they can improve the accessibility of their programming to disabled people. This can include interventions at all stages of programme making; from making changes at production stage to providing additional accessibility features. For example, we encourage providers to consider:

¹¹ This is in line with our statutory duties: see our [TV Access Services Code](#) (2.3) and s368C(2) of the [Communications Act 2003](#).

¹² See our [TV Access Services Code](#) (7.2) and s368D(3)(zza) of the [Communications Act 2003](#).

- Making programmes in Makaton (a language programme using symbols, signs and speech) for people with learning or communication difficulties.¹³
- Making programmes using sign-supported English, for example for people who have become deaf later in life.
- Providing a range of options to access foreign-language programming, including subtitling and dubbing.
- Enhancing the dialogue audibility of programmes for people with hearing loss, and/ or providing options to customise sound levels (see Subtitles section for more information).
- Adopting additional means of making programming more accessible to people with sight loss, such as use of integrated descriptions, audio introductions and audio subtitles (see Audio Description section for more information).

New Technologies

- 3.7 While Ofcom is open to the use of different technologies to make access services, providers should ensure that the adoption of new technologies enhances the quality of their access services, rather than detracting from it. Providers should assess new technologies against the principles in these guidelines and seek audience feedback to help determine their likely impact on quality.
- 3.8 Regardless of the technologies used, we remind broadcasters that we expect access services to be high quality in order to contribute towards the statutory quotas. Our [\[draft\] TV access services code](#) (4.6-4.8) sets out the factors we will take into account in assessing whether access services are of sufficient quality to meet the statutory targets.

¹³ For more information, see the Makaton Charity's [What is Makaton](#).

4. Prioritising Programmes and Promoting Awareness

Programme selection and scheduling

- 4.1 Broadcasters should not fulfil the statutory targets by scheduling multiple repeats of programmes, as this will detract from the benefits of meeting the targets. VoD providers should refresh their access services at least at the same rate at which they refresh content on their service more generally.
- 4.2 Providers should seek advice from disability groups about how best to maximise the benefits to disabled people when selecting and scheduling accessible programmes. In addition, providers should take account of the following recommendations:
- Prioritise making occasions of national importance accessible with subtitling, signing and spoken descriptions, enabling full participation in social and cultural life.
 - When a programme series begins with access services, make every effort to ensure that all programmes in the given series are made accessible

Guidance for VoD providers only:

Providers should make every effort to ensure that planned access services are added to on-demand programming as soon as it is made available, particularly for popular programming including boxsets. To help achieve this, VoD providers should build in time for creating access services as an integral part of negotiating content rights windows and scheduling release dates. If this is not possible despite best efforts, providers should inform viewers of if, and when, access services will be added to the programme.

VoD providers should build up access service provision across all their platforms¹⁴ as far as possible. However, in choosing which platforms to prioritise, we recommend that providers consider the popularity and usability of given platforms and consult with audiences and/or disability groups.

Accessible information including national emergencies

- 4.3 Where a programme is accessible to disabled people, providers should make every effort to ensure that important on-screen programme information is also made accessible. This

¹⁴ 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).

might include, for example, spoken warnings about potentially harmful flashing images, or audible signaling of product placement and sponsorship.

Guidance for broadcasters only

In order that disabled audiences are kept informed about national and local emergencies, it is important that broadcast information, including relevant telephone numbers and links to further information, is subtitled, signed and spoken. The subtitled information should preferably be in open format¹⁵ and leave sufficient time to write the details down.

We also remind broadcasters that the Government may require Ofcom to give a direction to specified licensed broadcasters to include a specified emergency announcement in their services, including in relation to a natural disaster. The direction must require the information given in the announcement to be provided in a manner which is accessible to disabled people.¹⁶

Promoting awareness

- 4.4 Providers should ensure that their audiences are aware of access services both as a general feature and in relation to availability on specific services, platforms and programmes.
- 4.5 Awareness should be promoted through a range of effective means, taking into account the full range of disabled audiences. This might include periodic on-air announcements (in the case of broadcast channels), information online and via social media, and in publications aimed at people likely to benefit from access services.
- 4.6 Communicating with viewers about availability is particularly important where there are changes to regular scheduling, interruptions in the provision of access services (for example during moments of national importance) or service outages. Providers should therefore ensure that they have prepared clear communication plans ready to implement in case of interruptions to service, and that these take into account the affected audiences and their needs.
- 4.7 Where there is expected to be a protracted outage, viewers should be informed quickly on the cause of the outage, steps being taken to remedy it, and the estimated time for full restoration of service. Also, viewers should be promptly informed when services have been restored.
- 4.8 Where broadcast or VoD services are available across multiple platforms, providers should offer information on the extent to which their programmes are accessible on each platform. For paid services (e.g. subscription), this information should be available before purchase.

¹⁵ Open captions are permanently visible on screen and cannot be turned on or off by the user

¹⁶ See [Section 336 \(1-3\) of the Act](#) and 7.2 of the [\[draft\] TV Access Services Code](#)

Guidance for broadcasters only

Broadcasters have a statutory duty to promote awareness of the availability of their access services to potential users, as outlined in the [TV Access Services Code \[6.1-6.3 of the \[draft\] code\]](#). This includes general awareness and specific requirements to ensure that programmes which carry access services are clearly indicated both in their own programme listings and by providing information to electronic programme guide (EPG) operators listing their services. They should use the standard upper-case acronyms for subtitling (S), audio description (AD) and signing (SL). Ofcom has imposed corresponding obligations on EPG providers, along with other usability requirements, in [the EPG Code](#).

Where practicable, broadcasters should make use of their own TV channels (and not just social media) to communicate with viewers in the event of disruption to services. Information provided should be accurate – for example EPG data on the availability of access services should be kept up to date if any services have been lost.

Guidance for VoD providers only

VoD providers should indicate which programmes are accessible on their own websites and apps and provide appropriate metadata to third-party platforms. They should also ensure that accessible content is easy to find, for example by offering filtering options for content with access services or clearly categorising accessible programmes. Such categories or filtering options should be prominent on the service and easy to use. Providers should also ensure that access services are easy to turn on/ off, for example by using clearly visible symbols or where appropriate audible signals.

5. Accessibility in production

Accessibility

- 5.1 We encourage providers and content makers to consider accessibility issues early on in the production process, including at commissioning stage. Small changes can make a significant difference to the accessibility of content, for example, making audible references to important information (e.g. scores in sports programmes) or ensuring that key on-screen text in programmes is clearly visible can make a significant difference for people with sight loss¹⁷.
- 5.2 Collaboration between accessibility experts and content production teams may help to maximise the benefits to relevant audiences. Involving content accessibility experts in production teams can aid consideration of relevant issues at an early stage, while access service providers may wish to engage with production teams to help them to reflect the creative intent of content.

Diversity

- 5.3 People are not defined by a single characteristic and disabled audiences reflect the full diversity of UK society. Audiences should be able to see/hear themselves authentically represented on-screen, including by audio describers and signers. Teams involved in making accessible programming should also reflect the diversity of their audiences to fully understand and effectively meet their needs and preferences. You can read more about Ofcom's role in promoting diversity in broadcasting, including our guidance for broadcasters on promoting equality of opportunity, at our [EDI Hub](#).

Training

- 5.4 While these guidelines give general principles of best practice, the production of high-quality access services involves considerable expertise and informed judgements on a case-by-case basis. Therefore, people making access services (including subtitles, audio description and signing) should be appropriately trained.

¹⁷ See audio description section.

6. Quality assessment

Monitoring

- 6.1 Providers should regularly monitor the quality of their access services, including against the specific goals included in their accessibility action plans. Providers should consider using quantitative models to help to assess the quality of their access services, for example in relation to specific aspects of subtitling quality such as accuracy and latency. Viewer feedback should also form an integral part of quality monitoring as discussed below.
- 6.2 Providers should monitor their output to ensure that scheduled access services are being provided correctly. The failure of access services is just as disruptive for those who rely upon them as a break in transmission would be for others. For more guidance on communicating with audiences in the event of a problem see promoting awareness section.
- 6.3 We remind Channel 3, Channel 4 and Channel 5 that they are required by Ofcom's [Television Technical Performance Code](#) to ensure that, where programmes are scheduled to carry access services, the presence and reliability of those access services is given the same priority as ensuring the presence and reliability of those programmes' vision and sound components.

Seeking feedback

- 6.4 Understanding audience needs and preferences is key to delivering high-quality accessibility features. However, disabled people can face additional barriers to providing feedback and not all are able to access online complaint routes easily.
- 6.5 Providers should ensure that their feedback and complaint routes are accessible at all points in the process. This should include:
- providing a variety of complaints routes, including, where appropriate, telephone (with information on accessing via text relay), email addresses, online forms, post, and video relay.
 - ensuring that complaints routes are easy to find on their websites and accessible to disabled people, for example by ensuring they are readable by screen reader software.
 - responding to feedback and complaints in a timely manner and in plain language. Providers should set out details on their websites on how to request responses in alternative formats.
- 6.6 Providers should also seek audience views proactively, rather than solely relying on feedback/ complaints routes. This should include gathering regular feedback on the quality and usability of access services and the selection/ scheduling of programmes. There are a variety of ways to achieve this, including:
- consulting with disability charities;

- setting up audience feedback sessions/ advisory panels;
- conducting audience research;
- and proactively seeking feedback via social media (e.g. with polls).

7. Other considerations

Editorial rules

- Accessibility features are part of the editorial content and so should comply with Ofcom's [broadcasting code rules](#) and [VOD editorial rules](#).

Equal opportunities legislation

- 7.1 Broadcasters will need to have regard to their obligations under equal opportunities legislation and should seek their own advice on this.

8. Subtitling and related accessibility features

What is subtitling?

- 8.1 Subtitling is text on screen representing speech and sound effects, synchronised as closely as possible with the sound.

Audiences:

- 8.2 People with hearing loss and d/Deaf people range from those who have lost their hearing in later life, to those who have been profoundly deaf since birth. For the deaf, and those with severe hearing loss, subtitles are likely to be the most important source of information. Viewers with a mild to moderate hearing loss are likely to rely on subtitles to aid their hearing rather than as a substitute. Most are likely to lip read to a degree. Subtitle users have differing proficiencies in English; for example, people with BSL as their first language may be less fluent in English.
- 8.3 The varying needs of subtitle users make it difficult to provide subtitling that suits everybody - the guidelines below aim to reflect generally accepted practice, but broadcasters should also bear in mind the target audience of given programmes.

Selection and scheduling of programming

- 8.4 Providers should aim to subtitle a broad variety of programming to appeal to the widest possible audiences, including popular programming and programming of particular interest to the Deaf community (for example programming which represents the Deaf community on-screen).

Ensuring quality:

Subtitles should be as accurate as possible

- 8.5 It is important that subtitles are as accurate as possible, so that viewers do not have their understanding or enjoyment of a programme impacted by inaccuracies.
- 8.6 Subtitling should reflect the speech verbatim as far as possible. It may be appropriate to remove some filler words (e.g. umms/ errs) where they do not carry meaning (e.g. conveying a character's hesitation). While the programme needs to comply with Ofcom's editorial rules¹⁸, the subtitles should not unnecessarily censor offensive language included in the dialogue.

¹⁸ See editorial rules section

Subtitles should be synchronised with the audio as closely as possible

- 8.7 This can help audiences who use subtitling in conjunction with audio and visual cues, including by lip reading. However, providers should also bear in mind the intended and/ or likely audience for their programmes; some people are likely to have slower reading rates and/or reading difficulties, for example some people for whom BSL is their first language or who have cognitive disabilities.
- 8.8 Young children may also read more slowly than adults, although the need for editing may depend on the speed of speech. Subtitles which accurately reflect the speech may also support children in developing literacy skills.

Live subtitles should have an average delay of no more than 4.5 seconds

- 8.9 We recognise that this may be more challenging on certain types of programming, such as fast-paced chat shows or sports programming. However, providers should aim for a mean latency¹⁹ of no more than 4.5 seconds across their live programming taken together.
- 8.10 Ofcom acknowledges that there can be trade-offs between prioritising accuracy and synchronicity in live subtitling, where some delay is inevitable and more conservative editing may be necessary. However, providers should make every effort to reduce delays and inaccuracies as far as possible, by:
- obtaining scripted material and preparing special vocabulary in advance.
 - maximizing use of pre-prepared block subtitles in sections of live programmes (i.e. where subtitles can be prepared in advance and then 'keyed out' live).
 - where possible, making use of "switchable delays" (i.e. allowing subtitles - but not audio or video- to shortcut delays inherent in the coding, multiplexing and playout processes).
 - reviewing and where necessary editing subtitling for repeated programmes first broadcast live

Sound effects and music should be clearly described

- 8.11 Unlike translation subtitles, subtitles for people with hearing loss should clearly describe relevant non-speech information, such as sound effects, the mood of music and tone of speech. Song lyrics should also be subtitled where possible and unexpected pauses or inaudible dialogue should be explained. Punctuation, italics or capitals may be used to indicate emphasis or emotion.
- 8.12 Music and sound descriptions should be specific rather than generic to describe the sounds as clearly as possible. Subtitlers should be encouraged to use their creativity to capture the essence of sound effects.

¹⁹ By latency, we mean the time delay between the speech and live subtitles.

- 8.13 Different speakers should be clearly identified. This can be achieved in a variety of ways, including using colours, punctuation, or positioning of subtitles. Where the source of speech is not immediately apparent, the first subtitle should have a caption to label the source and subtitles should also be used to identify the source of off-screen/off-camera speech where this is not obvious from the visible context.

Subtitles should be easy to read, without distracting from the main picture

- 8.14 Providers should use pre-prepared block²⁰ subtitles to support readability, where possible in live programming and always in pre-recorded programmes.
- 8.15 Subtitle fonts, colours and sizes should be easy to read and clearly visible against the background. Providers should bear in mind that some disabled audiences (e.g. deafblind or dyslexic viewers) may have particular need for accessible fonts (e.g. those which use simple shapes and characters that are not easily confused). Providers are encouraged to use antialiasing techniques to help make the appearance of subtitles clearer.
- 8.16 Subtitles are generally positioned at the bottom of the screen but should be moved when necessary to avoid obscuring the speaker's mouth or other vital information or activity. It is particularly important to avoid obscuring the face, as this conveys emotions and tone of voice, as well as being necessary for lip-reading. Subtitles and subtitle lines should be segmented at logical linguistic breaks.²¹
- 8.17 When determining the size and position of subtitles, providers should take account of the various platforms on which the content will be played out. Providers should consider customisation options in the presentation of subtitles to help address different needs and preferences.

Subtitles should be in the language used by the programme's intended audience for its spoken language

- 8.18 This is 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.

Other features

- 8.19 Audiences may have different levels of hearing loss and can be assisted by other features either instead or as well as subtitles. For example, enhancing dialogue audibility and/or providing options to customise sound levels in programmes (e.g. relative volume of background noise) where possible.²² We encourage providers to consider these features as they become feasible.

²⁰ Subtitles that appear as one block of text rather than word-by-word

²¹ See Section 3 of the BBC's [subtitle guidelines](#) include more detailed advice on subtitle line breaks.

²² 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](#)

9. Audio description and related accessibility features

What is audio description?

9.1 Audio description (AD) is an additional audio commentary developed primarily to enable people who are blind or partially sighted to access audiovisual content. AD is generally in the present tense and describes action in real time as it occurs. It includes descriptions of relevant visual elements of the content, such as body language, facial expressions and settings. This section also covers additional audio accessibility features such as integrated description²³ and audio introductions. Although these do not contribute to the broadcast AD quotas, we encourage providers to consider these additional ways of making content accessible.

Audiences:

- 9.2 While people with sight loss are drawn from all age ranges, a majority will have experienced loss of some or all of their vision later in life, for example, as a result of macular degeneration. Accordingly, audio describers should take account of the fact that most potential users of AD will have some level of sight or will have had sight at some stage.²⁴
- 9.3 AD may also benefit people with cognitive impairments, for example, people with autism may use it to help them to identify emotions or AD could be used to support language acquisition.
- 9.4 Preferences for audio description are likely to vary and so, while the guidelines below aim to reflect generally accepted principles, providers should tailor their provision to their given audience's needs and preferences.

Selection and scheduling of programming

- 9.5 People with sight loss like to watch the same sorts of programmes as everybody else, however not all programmes lend themselves to AD as well as others. Some programmes are too fast-moving, offer little opportunity to insert AD or may not be significantly enhanced by the addition of AD (e.g. news).
- 9.6 Some types of programming may better suit integrated description, which is where smaller changes are made to the original soundtrack to make it accessible to visually impaired

²³ Where small changes are made to the original soundtrack to make it accessible to visually impaired audiences (e.g. reading out on-screen text in quiz shows).

²⁴ [Key statistics about sight loss](#), RNIB 2021.

audiences (e.g. reading out on-screen text in quiz shows). Considering accessibility as part of the commissioning and production process can help to achieve this.

- 9.7 Providers should aim to reduce barriers to accessing content in news programmes such as on-screen text or foreign language segments translated through subtitles. These might be made accessible through presenters reading out on-screen text or the use of dubbing.

Ensuring quality:

AD should aim to offer an equivalent experience of the programme, in terms of both informing and entertaining audiences

- 9.8 AD should be in the language used by the programme's intended audience for its spoken language. AD should describe key visual information which is relevant to the plot, such as characters (including body language and expressions), location, colours, time, on-screen information, sounds that are not easily identifiable, scene changes and/or unexplained pauses in dialogue. It may also be appropriate to provide qualitative judgements to convey meaning or humour (e.g. describing a shirt as ugly if this is key to a joke).
- 9.9 Key visual character features should be described as soon as practical. However, AD should avoid revealing details in advance (e.g. character names) when the plot requires that they are withheld.
- 9.10 Beyond information which is directly relevant to the plot, AD should be sensitive to other visual features including diversity characteristics which may be of interest and relevance to audiences. Describing factors such as ethnicity or disability can help to convey levels of on-screen diversity to audiences and provide representation for people with sight loss from a range of backgrounds. Providers may wish to consider how best to avoid assuming default characteristics, for example by avoiding only describing skin colour for characters from minority ethnic backgrounds.
- 9.11 AD should not unnecessarily censor information that may be considered sensitive such as sexual acts and violence (while bearing in mind that the programme as a whole needs to comply with Ofcom's editorial rules).
- 9.12 Descriptions should be clear, accurate and easy to understand, taking care that the level of detail does not overburden audiences or distract from the enjoyment of the programme. AD should generally avoid describing over the main soundtrack unless really necessary to convey relevant information or to read subtitles/on-screen text. This means describers should make judgements about what information is the most important to include.

Audio introductions or extended audio description may be useful for providing additional detail

- 9.13 Given there is limited space available in the main soundtrack providers may wish to consider offering *audio introductions* or *extended audio description* on their online services to provide additional detail, such as information about diversity characteristics.

- *Audio introductions* are an additional AD track designed for audiences to listen to in advance of the main programming. They can be used to set the scene, for example by describing the physical appearance of characters and/or the setting where the action will take place.
- *Extended AD* involves pausing the video and main audio track to include additional description before the programme is resumed. Extended AD can be useful to enable extra details to be provided at the points where they are most relevant. Providers may wish to consider offering extended AD as an optional feature that can be turned on and off to facilitate choice.

9.14 We encourage providers to ensure that the availability of audio introductions or extended AD is clearly signposted to audiences.

AD should be easy to hear and understand

9.15 Providers should create an appropriate balance in sound levels to ensure the audibility of both the AD and main soundtrack. Providers may also wish to consider customisation options to enable audiences to adjust the sound levels of the AD and main soundtrack to match their preferences.

9.16 Providers should also ensure that the AD can be played through the same audio systems as the main soundtrack, for example through any surround sound systems.

The style of AD should be appropriate for the genre/type of programming

9.17 Providers should take account of the programme genre/type when developing the language and tone of AD and picking out details for description (e.g. describing clothing may be particularly important in fashion-based shows).

9.18 Providers may wish to explore different approaches to AD styles, taking account of audience preferences and feedback along with the programme type. This could include adopting a more neutral or unobtrusive style or a more informal or subjective style, for example by incorporating humour that reflects the nature of the content. Audience preferences for styles of AD vary and so providers may wish to offer different styles for different programmes.

9.19 Providers should ensure that the language and style of AD for children's programming is engaging and age appropriate.

Describers should be appropriate for the genre

9.20 Describers' voices should be chosen to suit the genre, the nature of the programming and the intended audience.

9.21 As far as possible, providers should also ensure that the same describer(s) voice the AD for each episode in a series. This is key to creating a sense of continuity for audiences and is especially important for series where audiences are likely to watch multiple episodes back-to-back.

10. Signing

What is sign language?

- 10.1 Sign languages are languages where people use hand gestures and movements, body language and facial expressions to communicate.
- 10.2 British Sign Language (BSL) is the most common form of sign language in the UK and is a distinct language (recognised as such by the Government²⁵), with different syntax and vocabulary from English. There are many regional dialects of BSL and different forms of sign language in other countries (including Irish Sign Language which is used by some in Northern Ireland).
- 10.3 There are different forms of signed programming:
- Sign-interpretation is when a programme in a different language (e.g. English) is translated into sign-language by a signer, usually in the corner of the screen.
 - Sign-presentation is when all the participants in a programme (e.g. presenters, actors) use sign-language.

Audiences:

- 10.4 Some people who are deaf or who have hearing loss (usually those who are profoundly deaf, often from birth or early in life) use BSL as their primary form of communication.
- 10.5 While some d/Deaf people are bilingual in both English and BSL, subtitling should not be seen as a substitute for sign-language: for many Deaf people BSL is their first language and Deaf people have varying levels of fluency in English. Young d/Deaf children, in particular, may not yet be literate in English and may rely on sign-language to understand and enjoy children's programming.
- 10.6 Sign language is also used more widely, including by family members of d/Deaf people and professional BSL users.

Selection and scheduling of programming

- 10.7 Both sign-interpreted and sign-presented programming can be enjoyed by audiences:
- Sign-interpretation allows people to enjoy popular programming made in other languages including English. It may be particularly important for news and current affairs programmes or programming on catch-up series which has been signed on broadcast TV.
 - Sign-presented programming allows Deaf people to watch programmes in their first language without translation and to see their culture and community reflected on-screen. Young deaf children who are learning sign language find it easier to understand

²⁵ See the [2022 British Sign Language Act](#).

and enjoy programmes presented in sign language, than those interpreted into sign language

- 10.8 VoD providers should consult their audiences when deciding whether, and on which programmes, to provide sign-interpretation, sign-presentation or a mix of both.
- 10.9 We also encourage providers to integrate representation of BSL-using people within programmes made primarily in other languages including English.
- 10.10 Broadcasters should schedule relevant programming for when sign-language users are likely to be watching. As far as possible, they should avoid scheduling programming in the early hours of the morning.

Ensuring quality

BSL should be the default language for signed programmes.

- 10.11 Broadcasters should use BSL as default to meet the signing requirements²⁶. However, broadcasters may also wish to use Irish Sign-Language for some audiences in Northern Ireland

Sign-interpretation should be synchronised as far as possible with the speech.

- 10.12 Sign-interpretation should be synchronised with speech / dialogue and voice-over on the main soundtrack to the extent that is possible when translating between languages.
- 10.13 Signed programmes, whether presented or interpreted in sign language, should be subtitled, to make it easier for people using both signing and subtitling to understand and enjoy them.

Sign-interpretation should accurately reflect the speaker's words and intonations.

- 10.14 Sign-interpretation should be accurate and easy to understand. Interpreters should emotionally reflect the content by portraying the speaker's intonations. Interpreters should also identify non-speech information, such as indicating who is speaking and key sound effects.
- 10.15 Sign-language interpreters and presenters should be appropriately qualified, both to use sign language of native competency and to communicate effectively through television.

Signers should be clearly visible.

- 10.16 Sign-interpreters should be clearly visible against the background screen, for example by wearing clothing of contrasting colour.

²⁶ See the [TV Access Services Code](#) for more information on the signing targets.

- 10.17 Interpreters should be large enough for their facial expressions and hand gestures to be easy to understand, while not obscuring key information on screen. We expect the sign-interpreter to generally appear on the right-hand side of the screen and take up at least 1/6 of the area of a television screen. When determining the size and position of the signer, providers should also take account of the various platforms on which the content will be played out.
- 10.18 Sign-language presenters, actors, or guests should be clearly in shot when communicating in sign-language in programmes. This includes when sign-language users appear in programmes made primarily in other languages including English.