



Access to broadcast and on-demand content: Time to catch up!

October 2017

Table of Contents

Executive summary	3
Background and research approach	6
Research findings: the context	7
Research: key findings	10
Time to catch up - key dichotomies in the provision of access services	15
Recommendations	18
Glossary	21

"Subtitles do make a big difference, because you are able to keep up with everything that's going on. Even watching films, you can share with your friends, you can talk about it. Without subtitles, you can feel completely shut out."

Paula, 43, hearing impaired, London

"[Audio description is a] huge benefit because it's like somebody reading you a story, and you've ...seen the story unfold and [can keep] up with it..."

Claire, 65, visually impaired, Scotland

Executive summary

People's television viewing has been revolutionised over the past ten years. No longer limited to traditional 'broadcast' TV, people are now able to exercise much greater choice over what they watch, and when they watch it.

But these new opportunities are not equally available to all. Even without the distinction between paid for TV and subscription services and those that are freely available, a disappointing number of on-demand services exclude proportions of their would-be audiences by a paucity of provision of access services: subtitles, audio description or signing.

Good access services can make a significant difference to people's interaction with television content. The objective is to enable people with sensory impairments to enjoy films and programmes independently, in an equivalent way to people without sensory impairments. Access services help people to engage with content and avoid marginalisation. They're used by a wide range of people, as Ofcom has previously noted: *"People using access services do not fall neatly into homogenous groups"*¹.

On-demand and catch-up services have much lower usage among those with visual impairments or hearing loss, and this applies across free and paid-for services. In our research 44% of all UK adults said they watched a free on-demand or catch-up service, compared to 28% of people with a visual or hearing impairment. Similarly, 41% of all UK

¹ https://www.ofcom.org.uk/__data/assets/pdf_file/0023/19391/guidelines.pdf

adults said they watched a paid for on-demand or catch-up service, compared to 19% of people with a visual or hearing impairment. This is not because there is less desire to watch on-demand programming amongst this group - as our research reveals, there are significant issues around availability and awareness.

There are statutory requirements to provide access services - defined as subtitling, sign language and audio description - for linear television services in the UK. And the recent Digital Economy Act will enable a requirement to ensure that on-demand programme services are accessible to people with hearing or sight loss.

We are very alert to the fact that Ofcom states that *"Broadcasters should also regularly monitor the quality of their access services. Focus groups and feedback from individual viewers can be a helpful indicator of quality"*². Against this background, we wanted to understand both the awareness and the usage of access services among the general UK public; and to gauge the satisfaction with usage of access services from members of the public with hearing/sight impairments.

Our research highlights an appetite for greater provision of access services across the media landscape. Our qualitative research strongly suggests there is a need for more awareness of what there is, greater knowledge on how to use it, and improvements to the quality of output.

Participants in the qualitative research reported that the availability of access services varies widely across different channels, platforms and service providers. This was in part related to inconsistencies in sign-posting of services and knowledge of how to access services. Simply finding access services enabled content is a challenge and this presents a barrier to engagement.

Amongst those with hearing or visual impairments, less than a quarter (23%) have used any access services - most which is driven by subtitle usage (21%). Just under three in ten (29%) of people with hearing impairments use subtitles, rising to 47% of people with a severe impairment. Usage of both audio description and signing is low.

Whilst our quantitative research suggests a broad level of satisfaction with access services, for example, 68% of those with impairments and using subtitles were satisfied with them, our qualitative research gave a different perspective. Here it became evident that there are a number of concerns about quality; subtitle accuracy (not accurately

² https://www.ofcom.org.uk/__data/assets/pdf_file/0009/40311/tv-access-services-2013.pdf

reflecting the film or programme content), spelling accuracy, latency, speed, colour, location and size.

The qualitative research also indicates that users of audio description find the quality variable; with issues around emphasising the wrong aspects, having too little detail, providing unnecessary detail, and inaudibility.

Better provision and quality, combined with promoting these services and educating people on how to use them, will help to improve accessibility and realise the ambition of deeper and broader engagement. It would also underscore the commitment and capacity of broadcasters - both linear and on-demand - to promote equality. One participant in our research commented on the normalising of sign language within the young children's television programme, 'Mr Tumble': it gave her hope that her son's deafness would not result in the same barriers that she experienced as a child, because the show gives visibility to both hearing and deaf children.

From our research three areas emerge where there are dichotomies at play in access services; stark contrasts between the intention and the outcome:

- Provision of access between linear versus non-linear 'catch-up'
- Availability versus awareness: viewers and listeners would be able to access more content, if only they knew the services were there and how to use them
- Objective versus outcome: access services should foster inclusion, but poor quality provision can instead amplify feelings of separation

At the end of this report, based on the findings of our research, we make several recommendations of next steps for the regulator, industry and stakeholders. They fall into five categories:

- Availability
- Awareness
- Quality
- Technology
- Complaints and feedback

We hope that this research will be valuable both to broadcasters and platform providers, as well as charities and groups working with people with sensory loss. We also hope that broadcasters will work with - and encourage high standards from - device manufacturers.

Background and research approach

Under the Communications Act 2003³, a legal requirement was set for broadcasters to provide access services, regulated by Ofcom. The statutory targets for broadcasters, as set out in Ofcom's Code, are 80% for subtitling, which for ITV and Channel 4 rises to 90%, and 100% for the BBC. Consequently, there have been major improvements in the accessibility of these services by many international and domestic channels for linear TV.

The requirements for signing and audio description, however, are far lower, with signing at 5% and audio description at 10%. The BBC, ITV, Channel 4 and BSkyB have committed to providing audio description on at least 20% of their content on most channels, but there is still a great discrepancy between provision of audio description and signing⁴ versus subtitling.

While the provision of subtitles on real-time linear TV services is encouraging, and has been spurred on by statutory requirements and the efforts of Ofcom, the provision of subtitles on non-linear services such as video on demand (VOD) lags behind. Research carried out by Ofcom in 2017⁵ showed that between April 2015 and March 2016, 68% of on-demand programming did not offer *any* accessibility provision.

There are requirements to provide access services to television programme services licensed in accordance with the Communications Act 2003, the Broadcasting Act 1996, or the Broadcasting Act 1990. However, this does not apply to catch-up programming or streaming services, known as 'on-demand programme services'. The Digital Economy Act 2017 included provisions to ensure that on-demand programme services are accessible to people with hearing or sight loss. It is hoped that a consultation will take place soon on the development of regulations that will require increased provision of access services for on-demand TV.

The Panel's objective in commissioning this research was to ascertain the availability, awareness and the usage of access services among the general UK public, but also to gauge the satisfaction with access services from members of the public with hearing and/or sight impairments.

³https://www.ofcom.org.uk/__data/assets/pdf_file/0021/81228/channels_required_to_provide_television_access_services_in_2016e.pdf

⁴ <http://www.legislation.gov.uk/ukpga/2003/21/contents>

⁵ https://www.ofcom.org.uk/__data/assets/pdf_file/0010/100225/accessibility-on-demand-programme-services-report.pdf

Many people using audio description have visual impairments, but some have been able to see at some earlier point in their lives, and by no means all are completely blind.

Likewise, the spectrum of people using subtitles can range from those with full hearing at one end - who use subtitles so that the television sound can be turned down - through those with minor hearing loss, to those who are profoundly deaf. In addition, there are some people, such as people who are deafblind, who may use more than one access service.

There were three key elements to the research: desk research; quantitative face-to-face fieldwork; and qualitative filmed in-home ethnographic interviews.

Research was conducted by Kantar, who for the quantitative element interviewed a nationally representative sample of 2000 adults aged 16 plus each week. Additional work was done to boost interviews among those with a hearing and/or visual impairment.

The qualitative research looked at the attitudes and experiences of access service users and encompassed 23 interviews lasting between 2-2.5 hours. Interviewees were people with hearing and/or sight impairments across England, Scotland, Wales (including a native Welsh speaker) and Northern Ireland. The interview sessions were conducted at the home of the main participant, with support present if needed. An informal ethnographic aspect involved observing participants' usage experience and recreating experiences.

Research findings: the context

Profiles of access service audience

Amongst the population as a whole, 8% of people have used any access service and by far the most common service used is subtitling (7%). Among those with hearing or visual impairments, less than a quarter (23%) have used any access services - the majority of which is driven by subtitle usage (21%). There is very low take up of audio description and signing services, even among those with related impairments. Our research indicates this may well be because of the significant issues around availability and awareness.

Those using access services span all age ranges, but a significant proportion of viewers using access services are older people, as the incidence of hearing and sight loss increases with age.⁶ In a nationally representative sample of the UK population, 19% of people are

⁶ https://www.ofcom.org.uk/__data/assets/pdf_file/0020/97040/Access-service-code-Jan-2017.pdf

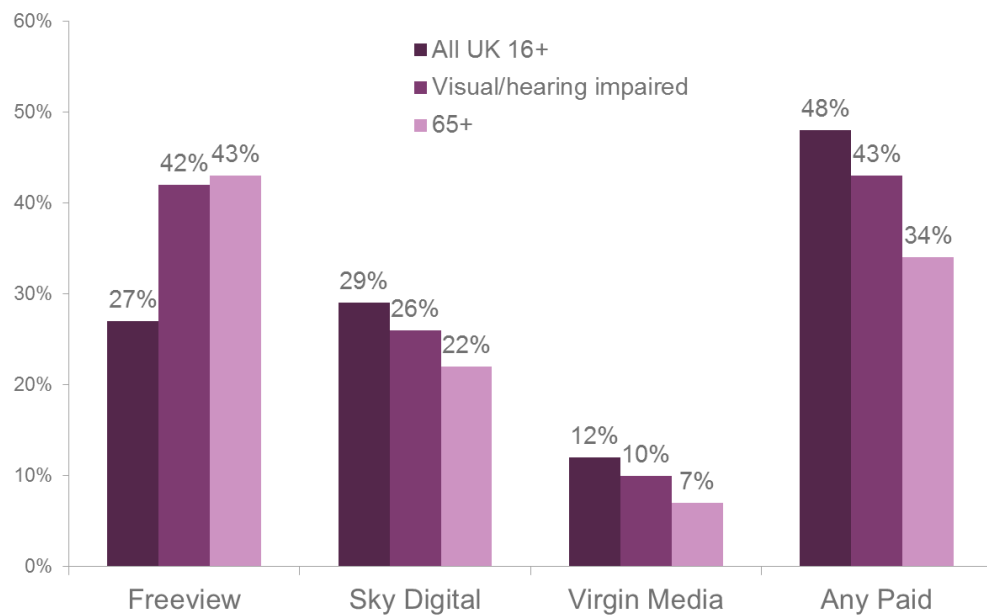
age 65 or over. Our quantitative survey found almost two-thirds of those people with visual or hearing impairments are age 65 plus, nearly three-fifths (57%) of participants with a visual impairment are age 65 or over and 72% of our participants with a hearing impairment are age 65 or over.

Two-thirds of those with visual or hearing impairments are also in the lower social demographics (59% C2DE). These compare with a nationally representative population figure of 49% classified as C2DE.

People with visual or hearing impairments are more likely to use Freeview as their primary source of television. Among those with a hearing and/or visual impairment 42% watch with Freeview, followed by Sky (26%) and Virgin Media (10%).

In the general UK population, 27% of people say that Freeview is the main service they use for live TV. This difference to a large degree can be explained by the age profile of those with a hearing and/or sight impairment: the main TV service that the general population aged over 65 use is Freeview (43%).

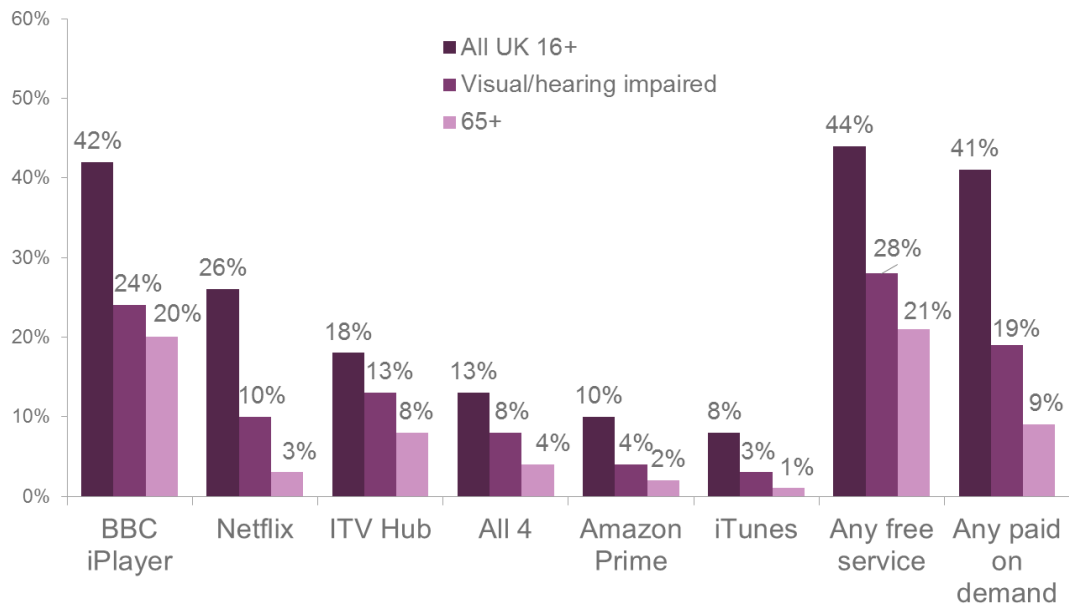
Figure 1: Main TV service personally used at home for linear TV



Unweighted base: Nationally representative sample (n=2302), All with hearing/visual impairment (n=893), All aged 65+ from the nationally representative sample (n=622)

On-demand programmes have much lower usage among those with visual impairments or hearing loss, and this applies across free and paid for services.

Figure 2: Services personally used nowadays for non-linear TV, among all aged 16+ Unweighted base:



Nationally representative sample (n=2302), All with hearing/visual impairment (n=893), All aged 65+ from the nationally representative sample (n=622)

Benefits of access services

As noted above, the objective of access services is to enable people with hearing or sight impairments to enjoy television independently, in an equivalent way to people without impairments. Our research found that good quality access services also enable people to enjoy television with other people without intruding too much on the viewing experience of others. By potentially reducing their reliance on family and friends to repeat dialogue, explain plotlines, describe pictures or provide a running commentary on content, access services offer sensory impaired people the freedom to view content modified to their own requirements, be it alone, or with other people.

For families, following a favourite soap, sitting down for a family film night, or laughing together at a comedy show, can be an important opportunity to bond and enjoy some down time together. Our participants made clear that when access services can facilitate this, they are highly welcome.

And for all people with sensory impairments, the ability to share a cultural experience, to keep up-to-date with the latest popular show or news event, can be crucial to their sense of belonging.

“It was excellent; I didn't feel left out. I could join in with work conversations about watching things.” Laura, 49, hearing impaired participant, Northern Ireland

And as one participant in our research commented on the normalising of sign language within young children's television programmes; shows such as 'Mr Tumble' give visibility and language skills to hearing and deaf children equally. This was echoed by another participant's comment:

“There is one programme, Mr Tumble, which is always on TV. He signs himself. It's not in the corner.”

Emily, 24, hearing impaired participant, Northern England

Secondary benefits and audiences

Many of our research participants in the qualitative study also highlighted secondary benefits derived from access services, such as English language and reading skills; access to educational resources; learning BSL (British Sign Language); and simply keeping the mind active - especially for older people.

Subtitles can be very valuable for those people for whom English is not their first language. Describing her experience of using subtitles for the first time, age 16, one participant explained how they had helped her learn English spelling and aided her learning:

“(Subtitles) helped me to catch up with English. It helped me to spell, helped me to learn and gave me a lot more confidence.”

Sian, 32, hearing impaired participant, Wales

One participant who was deaf commented that she thinks her two children read very well due to their viewing of TV with subtitles.

Research: key findings

Access services are extremely important to people with sensory impairments - enabling them to access and fully engage with media content.

Television is vital to participation and inclusion in social and cultural life, and people with sensory impairments have the same right to enjoy broadcast content as sighted and hearing people do. However, for many with hearing and/or visual impairments, that participation and enjoyment relies on programmes carrying subtitles, audio description, or signing.

When access services work well, they can have a strong positive impact; fostering feelings of inclusion, participation and value, and enabling users of access services to connect on a

cultural and interpersonal level with others. Participants within the qualitative study discussed how access services enable them to relax and enjoy television without relying on others to explain elements of the storyline; resulting in a sense of greater independence. Access services also help people engage with educational content and build language skills.

“[Audio description is a] huge benefit because it's like somebody reading you a story, and you've ...seen the story unfold and [can keep] up with it...”

Claire, 65, visually impaired participant, Scotland

When access services are not available or less than satisfactory, people with sensory impairments may feel marginalised and isolated

A lack of access services, or poor quality or inconsistent provision, impacts on people's lives negatively, resulting in negative feelings; disappointment, frustration, isolation and marginalisation, at home and in wider society.

“I'd like it audio described as well [as subtitles] so I can actually follow what is going on. Sometimes they do translate audibly, but when they don't I feel left out.”

Anna, 22, visually and hearing impaired participant, Midlands

The qualitative interviews also highlighted that core users tend to feel that access services are a low priority for platform and content providers. This perception is directly related to the difficulty of finding and navigating towards services, the quality of the services themselves and the barriers faced when using them.

More awareness of access services is needed

Our research indicates that at a national level, awareness of services is surprisingly low and there is a clear need for this to improve. Unsurprisingly, subtitles are the most well-known service, having been in place for longer and enjoying wider availability.

Less than half (42%) of our UK quantitative sample said that they were aware of any access services. Of even greater concern: only 54% of our respondents who have hearing or visual impairments, said they were aware of any access service. Just over half (54%) of our respondents with a hearing impairment were aware of subtitles and 30% aware of signing. Just over a quarter (26%) of people with visual impairments were aware of audio description.

One of our research participants discovered audio description purely by chance:

“...My husband actually discovered it by accident, he was trying to get whatever it was and there was this box came up and it said Audio and he put it on.”

Claire, 65, visually impaired participant, Scotland

Older people in our sample were also less likely to be aware of access services. Among people age 65 plus, with a hearing or visual impairment, 48% were aware of access services compared to 70% of people aged 16-34. Given that the age profile of those with sight and hearing impairments is older (the quantitative survey indicates 63% of people with hearing and/or visual impairments are age 65 plus), it is a concern that the results indicate that awareness levels are lowest among the core target user group.

Levels of awareness are significantly lower in Freeview-only homes which is likely to be age-related as Freeview homes tend to have an older age profile. Use of subtitles does appear to be higher among those with hearing impairments in households that have pay-TV and use on-demand programme services. Regarding online providers, such as Netflix and Amazon Prime, while some digitally confident people were aware of when subtitles were available other, less digitally confident people assumed that these platforms would not have access services. It was also felt by some that it was difficult to find out whether access services were provided and to what standard, without trying the service, which would usually involve a financial outlay.

Interestingly, the newcomers to the market fared well in the eyes of participants. Netflix was referenced positively several times. The speed at which YouTube provides high quality subtitles, for some types of content, was cited as being impressive and well received, as it enables users to enjoy new and trending content.

There is potential for much greater usage of access services

Just under one in ten (8%) of the UK population claim to use any access service with subtitles being the most commonly used service (7%). Around three-in-ten (29%) of people with hearing impairments claim to use subtitles, rising to just under half (47%) among those with severe impairments. Usage of audio description (AD) services is lower measuring 3% among the visually impaired, rising to 16% among those with a severe visual impairment. Low availability and quality emerged as particular issues. Usage of signing services was also low.

There are reasonable levels of satisfaction with the availability of subtitles on scheduled TV but there are issues with provision on catch-up

The quantitative research indicates reasonable levels of satisfaction with the availability of subtitles on scheduled TV programmes. Fifty percent of those aware of subtitles claimed to be satisfied with their availability, rising to 66% among users. However, the data also indicates some level of ambivalence with 38% of those aware and 23% of users neither satisfied nor dissatisfied, while absolute levels of dissatisfaction were low (11%).

On catch-up, there is a different story; 38% of those aware of subtitles claimed to be satisfied with their availability, rising to 46% among users - 20 percentage points less satisfaction with availability of on-demand subtitle provision compared to linear, as voiced by another frustrated customer, Daniella:

“I got my partner to phone up Sky about it...I thought I should get a discount on my TV because I can't watch the box sets, I can't watch catch-up.”

Daniella, 46, hearing impaired participant, South East England

The qualitative research also confirmed low levels of usage among visually impaired people - and although poor quality was an inhibitor to use, it was primarily related to low availability. One frustrated user described it as “*pot luck*” as to whether audio description would be available or not. The BBC was felt to be the best at providing audio description, whilst subscription services, despite having the most content, were felt to be the worst.

Across the qualitative research, signing was the worst performer out of the three forms of access services in terms of availability. Because signed programming is not widely available, and when it is available it may only be scheduled late at night or early in the morning, this impacts on how some participants who are deaf or hearing impaired believe that service and content providers view them.

Quality is an issue in both subtitling and audio description

In relation to the quality of subtitles, 68% of users were satisfied with the quality (40% very satisfied). Only 10% said they were not satisfied.

Issues with subtitle accuracy that were cited included: not accurately reflecting content; spelling errors; synchronisation (‘latency’) issues; speed; colour (for those with a visual impairment also); screen location; and size. The freedom to personalise text, as offered with subtitles on streaming services such as Netflix, YouTube and Amazon Prime Video would clearly assist viewers. Though this may not be possible on linear TV we hope to see it on more catch-up platforms soon.

The quality of audio description was also an issue, with qualitative research participants often describing it as having too little detail. An interesting example was the increasing prevalence of text messages as a plot device but not being read out in the audio description, which was cited as an issue. But it was also claimed that audio description can sometimes provide unnecessary detail e.g. a description of the detailed mechanisms of a weapon used by a character in an action scene. Other quality issues included emphasising the wrong aspects of a scene and being inaudible.

People claimed that some genres of programmes, for example nature documentaries, can have poorer quality audio description when compared with, for example, sport.

Inconsistency in provision and difficulties of navigation act as barriers to usage

Participants in the qualitative research reported that the availability of access services varies widely across different channels, platforms and service providers. This was in part related to inconsistencies in sign-posting of services/knowledge on how to access services. Simply finding access services enabled content is a challenge. There is a lack of clarity or consistency on signposting within menus across Electronic Programme Guide (EPG) providers. Many participants rely on printed guides to plan what they view. These issues represent barriers to engagement.

Many participants already found it physically challenging to use equipment such as TVs, set top boxes and remotes, and to find and navigate access services on them. But these physical barriers are even more challenging due to the inconsistent design, and the lack of signposting, accessible buttons etc. This was particularly important for blind and visually impaired people using EPGs.

“If you go to the Blue Filters [on the EPG] you get Entertainment, HD, Sports, but you don’t have [accessibility], it’s a logical thing to have. I often go to films and it will show me all the film channels but why not show the audio describing and subtitled channels?”

Nikki, 45, hearing impaired participant, London

“The [EPG] can only come as one size on the television... to be able to enlarge the text so I can read it...would be useful.”

Kelly, 42, visually impaired participant, Greater London

Many participants complained about the lack of programmes with access services on catch-up, but there were also complaints about the consistency of programming. When a series commences with access services, every effort should be made to ensure that all

programmes in the series are accompanied by the relevant access services. If unforeseen problems prevent this an announcement and/or an apology should be made in an appropriate format, i.e. audio or subtitles.

Time to catch up – key dichotomies in the provision of access services

Linear v non-linear ‘catch-up’: the provision of access services

Rather than watching traditional, linear, TV more and more people are watching programming via 'catch-up' - also known as on-demand programme services - be it via the traditional broadcasters' platforms, such as ITV Hub, My5 or BBC iPlayer, or through streaming subscription services e.g. Amazon Prime Video, Freeview Play and Now TV, and pay-as-you-go channels such as TalkTalk TV and Google Play. However, conversely, this increase in choice has resulted in proportionally less accessible programmes for those with a sensory impairment such as hearing or sight loss: access service provision on catch-up services has not kept pace, nor is there the same statutory obligation to provide these services as there is on linear TV.

People appear to have a clearer sense of what to expect from linear broadcasting platforms, but there is a limited understanding of access service provision on 'on-demand' platforms. However, those who have the confidence to use services such as BBC iPlayer, More4, Netflix and others, appear to be finding provision of a high standard. Amongst the general population, especially the 16-24s, on-demand viewing is increasing apace.

Availability v awareness: viewers and listeners would be able to access more content, if they knew the services were there and how to use them

Our research revealed a second factor impacting the usage of access services - a huge variance between what is actually available and what people know about; a dichotomy between reality and perception. Only 54% of our respondents who have hearing or visual impairments said they were aware of access services and our results indicate that awareness levels are lowest among those age 65 years plus, who are more likely to have sight and hearing impairments.

But issues can also be caused by simply not knowing *how* to activate subtitles or audio description; a problem which is exacerbated by the plethora of platforms and hardware, all using different interfaces and applications.

Objective v outcome: access services should foster inclusion, but poor quality provision can amplify feelings of separation

Thirdly, and perhaps this presents a rather bigger challenge, is the clash between the objective of these services and the actual outcome. Access services should serve to foster inclusion. The media plays an important role in our shared culture, and television is a path to participation and inclusion in that social and cultural life. For those of us with hearing and/or visual impairments, that participation is reliant on programmes carrying subtitles and/or signing, and audio description. For example, one of our younger participants, in her early twenties, spoke of her Netflix viewing and how the platform's subtitles enable her to keep up-to-date with programmes, and, vitally, to discuss these with her social group.

Being unable to participate in the social aspect of television viewing or the pursuant social commentary underlines difference and this can contribute to feelings of isolation and even lead to marginalisation from social circles, as Paula, one of our participants explained:

"Subtitles do make a big difference, because you are able to keep up with everything that's going on. Even watching films, you can share with your friends, you can talk about it. Without subtitles, you can feel completely shut out."

Paula, 43, hearing impaired participant, London

It is not just the ability to keep up with entertainment though; access services also enable people to keep abreast of and engage with news and current affairs - fostering civic engagement and participation. One participant, who is deaf and a full-time mum, spoke of how important it was to her to be able to discuss current affairs with her partner: access services enabled her to keep up to date with the news and to therefore engage in this important part of their relationship and to maintain that part of her identity.

Indeed, our research showed that there was a direct correlation between having a positive experience of access services and feeling recognised or valued by society. Participants viewed access services that worked, and worked for their situation, as recognition of people with sensory impairments.

Yet, too often, access services do not work well. And it is then that they negatively impact on people's enjoyment of media and the wider world. Low quality or disparate provision of access services can amplify feelings of separation and difference, and conversely to their purpose, actually serve to isolate those with sensory impairments from society and culture. For example, a number of our participants felt that they had to view

programmes alone as the experience of access services was not compatible with shared viewing.

“If I am sitting watching stuff with the family I don't tend to use audio description because it ruins their experience... having this dull voiceover telling them what's going on... I just don't think it's a kids' thing.”

Ben, 42, visually impaired participant, Scotland

The perception of access services as not being conducive to shared viewing can be due to experiences such as low quality provision - latency on live subtitling, subtitles blocking the action in a sports programme, or inadequate audio description - or because of issues with technology. For example, audio description is particularly seen as an impediment to other people's enjoyment if viewing television together. One of our participants, Ben, voiced the view that it would be very useful to have headphones which allow the user to receive audio description independently of the programme sound:

“I'd be wanting something that if I wanted to use audio description on a programme, that I could use it and it wouldn't affect anyone else's viewing. It would be one ear piece to listen to the audio description and I'd still have the ... all the conversation that's going on the telly, but also being able to be part of the family.”

Ben, 42, visually impaired participant, Scotland

Currently, participants compensate for low provision and quality of services by developing various coping mechanisms to browse and select content and can often 'make do' with a poor user experience: something we have seen in our previous research⁷.

The reliance on using different tools to hearing and sighted people can reinforce the feeling of loss felt by some people when their senses deteriorate - this is particularly true of those who lose their senses later in life. People who developed unexpected sensory impairments can also be slower to adopt coping mechanisms. This significant life change requires a huge adjustment and may cause distress or depression among people. Rather than utilising access services as a way of engaging with media, some people can withdraw, using access services on their own - for example, waiting until the rest of the family are in bed, or watching in a separate room. One person described having to stand very close to

⁷ <http://www.communicationsconsumerpanel.org.uk/research-and-reports/we-re-not-all-the-same-inclusive-communications>

the screen and adjust the lighting to watch programmes, and this led him to secluding himself in his study to watch. Another participant who has a hearing impairment described his car as a cocoon - a place where he can listen to his music as loud as he wanted, and without distraction or interfering noise.

Recommendations

Based on the research, the Panel make the following recommendations, which fall into five categories:

- Availability
- Awareness
- Quality
- Technology
- Complaints and feedback

Availability

- On-demand programme service providers should be required to have an equivalently high percentage of subtitling as their associated scheduled TV channels, or be given equivalent targets to broadcasters providing similar content on scheduled TV, if a standalone channel;
- All paid-for services should disclose at or before the point of sale the percentage of programming that has: a) signing; b) subtitling; and, c) audio description;
- Consideration should be given to increasing the requirement on audio description and signed content;
- Broadcasters and providers should make clear to consumers their criteria for providing access services, when and on what platforms they are available, to assist users in understanding availability and making viewing decisions; and
- If for any reason audio description or subtitling is not available when previously advertised or in a continuous series, broadcasters should explain why and apologise clearly, and in an appropriate format.

Awareness

- All stakeholders, including Ofcom, communications providers, broadcasters, retailers, platform providers and charities should work together to promote access services and adaptive technology to the general public, not just to those with

visual or hearing impairment; and all stakeholders should work together to make guidance and support available for users in how to activate and use on-screen and voice menus and access services across devices;

- When subscribing to a service or registering on a platform providers should ask about any sensory impairment requirements during the registration process and supply help guides and advice as appropriate - and enable users to update their information;
- Broadcasters and platform providers should promote the personalisation options of EPGs, where available;
- Providers should better promote access services available for programmes online, through programme guides and at the start of transmissions;
- Retailers should train staff regarding the access service options of hardware they sell; and
- Broadcasters should consider the development of independent audio description streams, similar to that available in cinemas.

Quality

- Broadcasters and Ofcom should give top priority to providing a technical solution to the problem of latency in live subtitling as soon as possible;
- Broadcasters and programme makers should improve the accuracy of subtitles; and
- Providers should focus on greater pre-transmission review of subtitles, to ensure they don't obscure important information, and consider the placement of on-screen captions and graphics to lessen the need for subtitles to be raised and lowered around them.

Technology

- Ofcom should pursue the Panel's previous recommendations⁸ on improvements to EPGs;
- Industry should design technology that allows access services to work on all platforms;
- Providers should add an 'accessibility' filtering option on EPGs;

⁸ <http://www.communicationsconsumerpanel.org.uk/downloads/epg-code-amendments-oct-2015-final.pdf>

- Hardware providers should work together with broadcasters to agree standardised locations and designs for access service tools such as buttons on remotes, menus on screen, speech capability and compatibility with screen readers; and
- Broadcasters should consider developing imagery to represent sounds to avoid lengthy subtitles; for example, an icon for 'phone ringing' or 'the sound of footsteps'. Broadcasters should continue to develop technology so that viewers can personalise the way subtitles and audio description appear, especially online or with on-demand services and work to standardise this technology.

Complaints/feedback:

- Broadcasters should make clear to viewers how to report any errors in access service provision; and
- Broadcasters should proactively seek the views of sensory-impaired audience members on quality and regularly review feedback, utilising the feedback to ensure they meet audience needs.

Glossary

Access services: subtitling, sign language and audio description of programme services.

Audio description: audio description is a voice-over that explains what is happening on screen - including non-verbal communication, the action, location and aspects of the setting, in order to aid understanding and enjoyment of the programme for blind or visually impaired viewers.

Catch-up: a form of on-demand programming that makes programmes available on-demand for a specified period after the real-time broadcast (e.g. 7-day catch-up TV).

EPG - 'Electronic programme guide': menu-based systems that provide users of television, with on-screen TV guides and the ability to access the programme service(s) listed.

Hearing impaired: people with partial hearing loss, and those who are completely deaf.

Latency: delays between speech and the corresponding subtitle appearing on screen.

On-demand - or 'video-on-demand': is any programme that is downloaded or watched but not as live television; it includes catch-up TV and online only programming such as films or archived content. On-demand programmes can be accessed via a website, an app on a smart TV service, digital box or any other device.

On-demand programme services (ODPS) - 'On-demand services subject to Ofcom regulation.

Sign language: sign language comprises the use of manual gestures, facial expression and body language to convey meaning. British Sign Language (BSL) is the most popular sign language in the United Kingdom. This is a distinct language (recognised as such by the Government) with different syntax and vocabulary from English. In addition to different forms of sign language in other countries, Sign Supported English (which tends to follow the syntax and vocabulary of English) and Makaton (a simplified form of sign language sometimes used with deaf children) are also used in the UK⁹.

Speaking EPGs: electronic programme guides that use text to speech technology to read the information aloud.

⁹ https://www.ofcom.org.uk/__data/assets/pdf_file/0016/40273/tv-access-services-2015.pdf

Subtitles/subtitling: subtitling is defined by Ofcom as “text on screen representing speech and sound effects that may not be audible to people with hearing impairments, synchronised as closely as possible to the sound”¹⁰.

Video-on-demand - see 'On-demand'

Visually impaired: people with partial sight loss, and those who are completely blind.

¹⁰ https://www.ofcom.org.uk/__data/assets/pdf_file/0016/40273/tv-access-services-2015.pdf