

The logo for The Authority for Television On Demand (ATVOD) consists of the letters 'ATVOD' in a bold, white, sans-serif font, centered within a solid black rectangular background.

**ATVOD**

THE AUTHORITY FOR TELEVISION **ON DEMAND**

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# **Video On Demand Access Services**

## **Best practice guidelines for service providers**

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## Background

The Authority for Television On Demand (“ATVOD”) was designated by Ofcom on 18 March 2010 as the appropriate regulatory authority for editorial content made available in On-Demand Programme Services.

The duties of the appropriate regulatory authority for On Demand Programme Services are set out in Section 368C of the Communications Act 2003 and include the following duty with respect to access services:

*“The appropriate regulatory authority must encourage providers of on-demand programme services to ensure that their services are progressively made more accessible to people with disabilities affecting their sight or hearing or both.”*

Therefore these guidelines are for providers of on demand services that fall within the statutory definition of On Demand Programme Services (“ODPS”). For more information on what constitutes an ODPS please see ATVOD’s ‘Guidance on who needs to notify’, available on its website [www.atvod.co.uk](http://www.atvod.co.uk).

For the avoidance of confusion, ‘service provider’ here refers to providers of On Demand Programme Services. References to providers of access services will be identified as such where appropriate.

## Access Services

In the UK one in seven of the population, or nearly 9 million people, have a hearing loss. Approximately 2 million people have some degree of sight loss. With an ageing population, these numbers are very likely to increase. Access to TV-like programmes is a central part of the common cultural life of many people in the UK, and the ability to enjoy TV-like programmes is as important to people with disabilities relating to sight or hearing as it is to those without such disabilities.

ATVOD therefore encourages all providers of ODPS to ensure that their services are progressively made more accessible to people with disabilities affecting their sight or hearing or both. This can be achieved through providing increasing numbers of programmes with access services such as subtitles, audio description and signing.

ATVOD believes that the provision of on-demand programming offers new opportunities for making content accessible, as the lack of a schedule means that programmes with access services can be found and viewed at any time.

## General Guidance

These guidelines provide information on best practice in order to deliver an acceptable user experience. They seek to indicate user requirements in relation to effective subtitling, signing and audio description. For more information on accessibility and usability of access services, and on technical implementation, please see the section 'Reference material' (page 12).

For those service providers in the United Kingdom that are providing video on demand access services (subtitling, signing and audio description), ATVOD encourages them to have regard to these Guidelines, whether creating new access services or using existing access services.

As a first step to increasing accessibility, ATVOD encourages service providers to source existing access services from content providers. Service providers are urged to make content available with any available access services, albeit non-compliant with these Guidelines, in preference to no access services (for example repurposing existing non-UK subtitles).

These Guidelines will be subject to annual review in the light of technological and other developments. ATVOD recognises that implementation of any new recommendations will usually take time.

## Users of Access Services

People using access services do not fall neatly into homogenous groups. For example, many people using audio description have visual impairments, but by no means all are completely blind, and most have had some vision at some time. By the same token, those using subtitles can range from those with normal hearing (using subtitles so that the television sound can be turned down), through those with relatively minor hearing loss, to those who are profoundly deaf. Some people (particularly those with dual sensory impairment) may benefit from more than one access service. People of all ages can have a combined sight and hearing loss. They do not have to be completely deaf and blind - in fact, most people have some useful vision and hearing. Those using access services range from the very young to older people, but a significant proportion of viewers using access services are older people, as the incidence of hearing and sight loss increases with age.

## Selection and organisation of programmes

Providing access services is of limited use if users do not know that they are there. It is therefore recommended that service providers make efforts to publicise the presence of particular access services on their VOD services, for example by liaising with user organisations.

More specifically, service providers are encouraged to signal that access services are available for a particular programme, giving this information before the point at which the programme is chosen by the user for viewing.

As a minimum standard, ATVOD recommends an indication at the end of a programme description that it contains specific access services (Eg. via the commonly used abbreviations such as S for subtitles). Ideally, information on the presence of access services would also be contained within the programme file / data stream, allowing the user to sort content on the basis of available access services.

Where a sequence of programmes relies on continuity for understanding and/or enjoyment (for example episodic drama, news and sports coverage) every effort should be made to ensure that *all* programmes in the series are accompanied by the relevant access services. If the first programme in a series has access services but subsequent programmes do not, this should be clearly communicated to the user of the service.

The usability and accessibility of access services is key in light of the fact that the major stakeholder groups for these services have disabilities affecting their sight or hearing or both. Access services should be simple to enable and disable, through means which are appropriate for users of such services, for example using single button features which are identifiable by tactile markings and which give maximum audible feedback. Methods used for navigation and control of access services should be consistent across all interfaces.

### *Monitoring for consistency and quality*

Service providers should monitor playout at regular intervals to ensure that 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 (for example) streaming would be for others. Where practicable, service providers should communicate an apology by appropriate means, as soon as a problem has been identified, with a brief explanation of the cause.

Service providers should also regularly monitor the quality of their access services. Focus groups and feedback from individual viewers can be helpful indicators of quality.

### *Consultation and feedback*

Service providers should ensure that they consult periodically with groups representing access services users on issues such as the quality of access services and the selection of programmes. To facilitate feedback from access service users, service providers should also provide contact details on their websites, including e-mail addresses and telephone and textphone numbers. Service providers should monitor and respond to this feedback.

## Subtitling

### *What is subtitling?*

Subtitling is 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.

### *Users*

People using subtitling range from those who have become hard of hearing in later life, to those who have been profoundly deaf since birth. Many people with good hearing also use subtitles so that they can watch video on demand programmes with the sound muted (e.g. so that they can simultaneously talk on the telephone), or learn English, but they are not the target audience. For deaf people, and those suffering severe hearing loss, subtitles are likely to be the most important source of audio information. Viewers with a mild to moderate hearing loss are likely to rely on subtitles to aid their hearing rather than as a substitute. But all are likely, consciously or subconsciously, to lip read to a degree. Subtitle users reflect the full range of proficiency in English; some profoundly deaf people regard BSL as their first language, and are less fluent in English. While the varying needs of subtitling users make it difficult to provide subtitling that suits everybody, the guidelines below reflect generally accepted practice.

### *Selection and organisation of programmes*

Service providers should give priority to the most popular programmes, as subtitling on these is likely to benefit most people. Service providers should also bear in mind subtitling programmes likely to be of more interest to older people, as these account for a large proportion of subtitle users. As provision of access services grows, the emphasis of programme selection should shift towards subtitling a broader range of programmes appealing to different types of viewer.

### *Best practice*

**Presentation:** subtitles should be readable by the user on the device they are using to access the service. Subtitling should use a highly legible screen font (such as Tiresias), appropriate to the particular delivery device. For services accessed through a television monitor, subtitles should be no less than 20 television lines for the capital 'V', to include those lines at the top and bottom of each character containing pixels that are at least 50% illuminated. Services accessed through other devices should adhere to the same standards, as far as is practicable. Service providers should bear in mind that larger fonts may be appropriate where the standard size is unreadable. Factors such as font choice, resolution of the video, size of the screen and likely proximity of the user to the screen can affect legibility of subtitles. Service providers are encouraged to use antialiasing techniques to help make the appearance of subtitles clearer. Subtitles should be placed within the 'safe caption area' of a 14:9 display and should normally occupy the bottom of the screen, except where they would obscure the speaker's mouth or other vital information or activity. It is particularly

important to avoid obscuring the face, as this convey emotions and tone of voice, as well as being necessary for lip-reading.

For subtitles to be readable they need to be high contrast. Pre-prepared block subtitles are the best approach to providing accurate, easily legible and well-synchronised subtitles. Recommended colours are white, yellow, cyan and green against a solid black background as these provide the best contrast. Where necessary and appropriate service providers should use other methods to achieve contrast, for example characters with a contrast outline.

Users value the ability to easily turn subtitling on and off, and to change its appearance. Therefore subtitling should be closed rather than open, ideally in formats where the visual characteristics of the subtitle text can be altered.

Lay-out: subtitles should normally comprise a single sentence occupying no more than two lines, unless three lines will not obscure the picture. If necessary, sentences should be broken or reformed into more than one sentence at natural linguistic breaks so that each subtitle forms an understandable segment. Where breaks occur, the split should be made in a way that makes clear that there is more to come. This can be achieved by ending the first subtitle with a conjunction, a colon or semi-colon as appropriate, or even a short run of dots. Line breaks within a word must be avoided. Subtitles should not obscure sign language interpreters, and vice versa.

Non-speech information: in addition to speech, subtitles should clearly describe relevant non-speech information, such as the mood of any music playing and the words of songs if possible (using the # sign to precede and conclude music), louder speech (using capital letters), inaudible mutterings or incoherent shouts etc. (which should be explained as such). Subtitles should be displayed horizontally in the direction of any sound effects, and where the source of speech is not immediately apparent the first subtitle should have a caption to label the source. Italics or punctuation marks may be used to indicate emphasis. Where long speechless pauses in programmes occur, an explanatory caption should be inserted. Different colours should be used to denote different speakers. Subtitles should be used to identify the source of off-screen/off-camera speech where this is not obvious from the visible context.

Synchronisation of speech and subtitling: the aim should be to synchronise speech and subtitling as closely as possible. Subtitle appearance should coincide with speech onset and disappearance should coincide roughly with the end of the corresponding speech segment. If necessary, subtitling may be edited conservatively if this is necessary to avoid long delays between speech and subtitling. If possible, subtitles should not inappropriately over-run shot changes and should commence on a shot change when synchronous with the start of speech.

Speed of subtitling: the speed should not normally exceed 160 to 180 words per minute. Commissioning editors and producers should be aware that dialogue which would require subtitles faster than 200 wpm would be difficult for many viewers to follow. Consideration may be given to displaying three lines of subtitling rather than two, to allow longer for the subtitles to be read, provided that this does not obscure important parts of the picture.

Slower speed and more heavily edited subtitles are appropriate for young children, though care should be taken to ensure that these are accurate and grammatical, as children and parents use subtitles in developing literacy skills.

Accuracy: subtitle users need to be able both to watch what is going on, and to read the subtitles, so it is important that these are as accurate as possible, so that viewers do not need to guess what is meant by an inaccurate subtitle. Service providers should ensure that subtitles are reviewed for accuracy before a programme is made available. The subtitling for programmes previously broadcast live should be reviewed and edited if necessary.

Publicity: the word 'Subtitles' should be displayed legibly on the screen at the start of the programme.

## Audio description

### *What is audio description?*

Audio description is a service primarily aimed at blind or visually-impaired people. It comprises a commentary woven around the soundtrack, exploiting pauses to explain on screen action, describe characters, locations, costumes, body language and facial expressions to enhance meaning and enjoyment for blind or visually-impaired viewers.

### *Users*

While people with visual impairments are drawn from all age ranges, a majority will experience 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 audio description will have some sight, or will have had sight at some stage.

### *Selection and organisation of programmes*

Although visually-impaired people like to watch the same sorts of programmes as everybody else, not all programmes lend themselves to audio description. Some programmes are too fast-moving, or offer little opportunity to insert audio description (e.g. news), or may not be significantly enhanced by the provision of audio description (e.g. quiz programmes).

### *Best practice*

What to describe: to the extent relevant to the storyline, audio description should describe characters, locations, time and circumstances, any sounds that are not readily identifiable, on-screen action, and on-screen information.

Characters: identifying and describing characters is vital to effective audio description. Key features should be identified as soon as practicable, to help identify the person in the listener's mind's eye and avoid the need for long-winded and confusing descriptions, e.g.

'the tall man', 'district attorney Lopez'. But do not give the name away if the plot requires the character's identity to be revealed at a later date. When describing characters, aspects such as dress, physical characteristics, facial expression, body language, ethnicity and age may be significant. Don't shy away from using colours or describing a character as pretty, or handsome, where relevant to the story. Generally names (rather than 'he' or 'she') are used more often than in normal speech, so as to avoid confusing the audience, particularly when there are several people taking part in a dialogue.

On-screen action: wherever possible try to describe at the same time as the action occurs. This is particularly important with regard to comic situations, where the audience, sighted and visually impaired, should be able to laugh at the same time. Where relevant, key back-references can be included. It may be necessary to set up the next scene during the current description.

Settings: when describing locations, try to cover scene changes where possible. the locations (including scene changes wherever possible); the time of day/season/date setting where appropriate; any sounds that are not readily identifiable; and on-screen information (e.g. signs, hieroglyphics, open subtitles for foreign languages, captions, and opening and closing credits). The description should not censor what is on screen. However, it should not be necessary to use offensive language, unless (for example) when referring to content that is integral to understanding the programme, such as graffiti scrawled on a wall.

What not to describe: the description should only provide information about what can be seen on the screen. Information unavailable to the sighted viewer should not be added though discretion is always necessary. 'A turreted bridge over a city river' would fall short if the sighted audience sees London's Tower Bridge, even without an identifying caption. Generally, 'filmic' terms such as camera angles should not be used.

When to describe: audio description should not encroach on dialogue, important or complementary sound effects, or critical sound effects unless really necessary. Even then, audio description should only be used to impart relevant information when the dialogue or other sound is inconsequential, or to read subtitles or on-screen captions. To differentiate between subtitles and description the describer should do this by either the use of their voice (e.g. stating the obvious, 'He says in Russian...' or 'A caption reads...') or a second voice. During opening titles and end credits, care should be taken to avoid clumsy overlaps with song lyrics. During songs, audio description should ideally fall where there is a reprise of the lyrics and where the lyrics are not relevant to the storyline. Language: audio description provides a real-time commentary, so should generally be in the present tense (he sits), the continuous present (he is sitting) or the present participle ('Standing at the window, he lets out a deep sigh'), as appropriate. Variety is important, particularly with verbs. 'She scuttles into the room' rather than the simple fact 'She enters the room' creates a clearer image for the viewer (a Thesaurus is always useful). Adverbs are a useful shorthand to describing emotions and actions, but should not be subjective. Vocabulary should be matched to the genre of the programme, and should be accurate, easily understood, and succinct.

Delivery: delivery should be steady, unobtrusive and impersonal in style (but not monotonous), so that the personality and views of the describer do not colour the programme. Avoid the term 'we see'. However, it can be important to add emotion,

excitement, lightness of touch at different points in different programmes to suit the mood and the plot development – the style should be matched to the genre of the programme. Diction should be clear, and not hurried – every word should be clear, audible and timed carefully so that it does not overrun subsequent dialogue. The aim should be to enhance the enjoyment of a programme not to distract from it.

Balance: judgement is needed in striking an appropriate balance between the amount of detail that is conveyed, and the risk of overburdening the audience with detail and detracting from the enjoyment of the programme. Too much description, even where there is a lot of space for description, can make it difficult for viewers to absorb information. The programme should be allowed ‘to breathe’. On the other hand, long gaps in the dialogue may need to be explained if the viewer is not to be left confused, e.g. ‘the cowboy rides across the prairie into the distance’. If a slot available for audio description is short, it is better to focus on key moments and dynamics rather to rush the description or fill every available moment. For example, it may be distracting in dance or fight scenes to describe every piece of action. A consistent approach is important: if a description starts out as detailed, it should not suddenly become scant.

Describers: describers should be chosen to fit the genre, the nature of the programme and the intended audience. Ideally, the same people should be used to describe a series of programmes, both to ensure a consistent style (e.g. in terms of level of detail) and because the description forms a part of the programme for users.

Children’s programmes: Language and pace of delivery for children’s programmes 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 than would be the case for programmes aimed at adults.

Publicity: information should be provided about programmes with audio description.

Product placement: 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.

Functionality: the DTG U-Book (see references) contains a detailed chapter on the functional aspects of delivering Audio Description.

## Signing

### *What is 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) is also used in the UK.

### *Users*

Some people who are deaf or have significant hearing impairments (usually those who are profoundly deaf, often from birth or early in life) use BSL as their preferred form of communication. Young deaf children who are not yet literate in English rely particularly on sign language to understand and enjoy children's programmes.

### *Selection and organisation of programmes*

ATVOD recommends that, in selecting and organising signed programmes, service providers consult the available research (see 'Reference material') and should seek advice from disability groups about how best to maximise the benefits to sign language users.

### *Best practice*

Language: BSL should be the default language for signed programmes. However, service providers may also use other forms of signed communication (e.g. Sign Supported English for programmes aimed primarily at people who have gone deaf in later life) where consultation with disability groups has indicated that this would be acceptable. So far as possible, interpretation and voice-overs of signed programmes should be synchronised with the original speech / sign language.

Presentation: Signed programmes may be presented or interpreted into sign language. Sign language users particularly appreciate programmes presented in sign language; 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. 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.

Signers: sign language presenters, reporters, translators and interpreters should be appropriately qualified, both to use sign language of native competency, and to communicate effectively through the medium of video. The translator should be bilingual in BSL and English; ideally they should have a Level 6 Diploma in Sign Language Translation. Interpreters should be registered with the National Registers of Communication Professionals working with Deaf and Deafblind people.

Some latitude is allowed for guests and interviewees, though service providers should ensure that they are understandable. The signer should use a style of interpretation and wear clothing that is appropriate to the style of the programme. For example, sober and business-like clothing should be worn for news and current affairs programming, while a more colourful and informal style of dress would be appropriate for children's programmes. It is important that signers' clothing allows them to be seen distinctly against the picture.

Size of image: the image of the signer superimposed upon the original programme should generally appear on the right hand of the screen and occupy a space no smaller than one sixth of the picture.

Techniques: the signer should use appropriate techniques to indicate whose speech he or she is interpreting, and to draw attention to significant sound effects.

Delivery: different methods of delivery are permissible, provided that the provision of sign language complies with the Guidelines, and that it is available in a form that is accessible to all viewers who want it, without the need to purchase special equipment or services. Service providers who wish to use new forms of delivery should consult ATVOD and disability groups first.

## Reference material

While ATVOD is not responsible for the content of external websites, video on demand providers and access service providers may find it helpful to consult the following:

### General

- **Ofcom's 2006 Research on the provision of Access Services**  
<http://stakeholders.ofcom.org.uk/binaries/consultations/accessservs/annexes/provision.pdf>  
Information on the size of the market using access services at that time, and the needs and preferences of users and potential users.
- **UK Digital TV Usability and Accessibility Guidelines (“U-Book”)**  
<http://www.dtg.org.uk/publications/books.html>  
Detailed usability and accessibility guidelines in relation to Digital TV.
- **W3C guides to web accessibility and standards**  
<http://www.w3.org/WAI/intro/accessibility.php>  
Information, standards, and technical guidance, including principles of good web design practice
- **BBC Standards and Guidelines on accessibility**  
<http://www.bbc.co.uk/guidelines/futuremedia/accessibility/>
- **BBC Paper “Access Services For Digital Television: Matching The Means To The Requirement For Audio Description And Signing”**  
<http://downloads.bbc.co.uk/rd/pubs/papers/pdffiles/ibc00net.pdf>

### Visual impairment

- **RNIB’s guidance on improving accessibility**  
[http://www.rnib.org.uk/professionals/solutionsforbusiness/tvradiofilm/broadcasters/Pages/broadcast\\_professional.aspx](http://www.rnib.org.uk/professionals/solutionsforbusiness/tvradiofilm/broadcasters/Pages/broadcast_professional.aspx)  
Includes guidance on audio description in children’s programmes
- **BBC’s Guidelines for visually-impaired television audiences**  
<http://www.bbc.co.uk/guidelines/editorialguidelines/assets/advice/guidelinesforvisuallyimpairedtelevisionaudiences.doc>
- **BBC Audio Description White Paper**  
<http://www.bbc.co.uk/rd/pubs/whp/whp051.shtml>
- **Former ITC Audio Description guidelines**  
<http://is.gd/vcs630>  
Provide detailed guidance

- **RNIB Policy Paper: Audio description on television: past, present and future**  
[http://www.rnib.org.uk/professionals/solutionsforbusiness/tvradiofilm/Pages/tv\\_film.aspx#H2Heading7](http://www.rnib.org.uk/professionals/solutionsforbusiness/tvradiofilm/Pages/tv_film.aspx#H2Heading7)

### *Hearing impairment*

- **Action on Hearing Loss Policy Statement - “Access to television for people with hearing loss”**  
<http://www.actiononhearingloss.org.uk/supporting-you/policy-research-and-influencing/policy/policy-statements/access-to-services.aspx>
- **Action on Hearing Loss “Buyers Guide to BSL Translation on the Internet”**  
<http://www.actiononhearingloss.org.uk/supporting-you/accreditations-assessments-and-training-for-businesses/a-buyers-guide-to-bsl-translation-for-the-internet.aspx>
- **National Registers of Communication Professionals working with Deaf and Deafblind people**  
[www.nrcpd.org.uk](http://www.nrcpd.org.uk)
- **BBC Online Subtitle Guidelines and subtitle editorial guidelines**  
<http://www.bbc.co.uk/guidelines/futuremedia/accessibility/subtitling.shtml>  
[http://www.bbc.co.uk/guidelines/futuremedia/accessibility/subtitling\\_guides/online\\_subtitle\\_editorial\\_guidelines\\_vs1\\_1.pdf](http://www.bbc.co.uk/guidelines/futuremedia/accessibility/subtitling_guides/online_subtitle_editorial_guidelines_vs1_1.pdf)
- **Tiresias: “A new font for digital television subtitles”**  
[http://www.tiresias.org/fonts/design\\_report\\_sf.htm](http://www.tiresias.org/fonts/design_report_sf.htm)
- **Mencap’s FSMe font**  
<http://www.mencap.org.uk/about-us/our-brand>  
<http://www.fontsmith.com/fonts/>
- **BBC White Paper on Speech Intelligibility In Broadcasting**  
<http://www.bbc.co.uk/rd/publications/whitepaper190.shtml>
- **Deaf children and television, National Deaf Children’s Society**  
<http://www.ndcs.org.uk/document.rm?id=3192>  
[http://www.ndcs.org.uk/about\\_us/campaign\\_with\\_us/england/campaigns\\_archive/tv\\_accessibility/index.html](http://www.ndcs.org.uk/about_us/campaign_with_us/england/campaigns_archive/tv_accessibility/index.html)  
[http://www.ndcs.org.uk/about\\_us/position\\_statements/access\\_to\\_tv\\_film.html](http://www.ndcs.org.uk/about_us/position_statements/access_to_tv_film.html)

## Legal Context

The following links provide legal background on matters related to accessibility

- **AVMS Directive 2010/13/EU**  
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:095:0001:0024:EN:PDF>  
Article 7 states: “Member States shall encourage media service providers under their jurisdiction to ensure that their services are gradually made accessible to people with a visual or hearing disability.”
- **Equality Act 2010**  
<http://www.legislation.gov.uk/ukpga/2010/15/contents>  
While the relevant provisions pertaining to accessibility do not apply to content services, they may apply to the wider activities of service providers.
- **United Nations Convention on the Rights of People with Disabilities (UN CRPD)**  
<http://www.un.org/disabilities/convention/conventionfull.shtml>  
Formulates a general accessibility duty and makes specific reference to television access services in Article 30(1) (“*States Parties recognize the right of persons with disabilities to take part on an equal basis with others in cultural life, and shall take all appropriate measures to ensure that persons with disabilities: [...] b. Enjoy access to television programmes, films, theatre and other cultural activities, in accessible formats*”).)