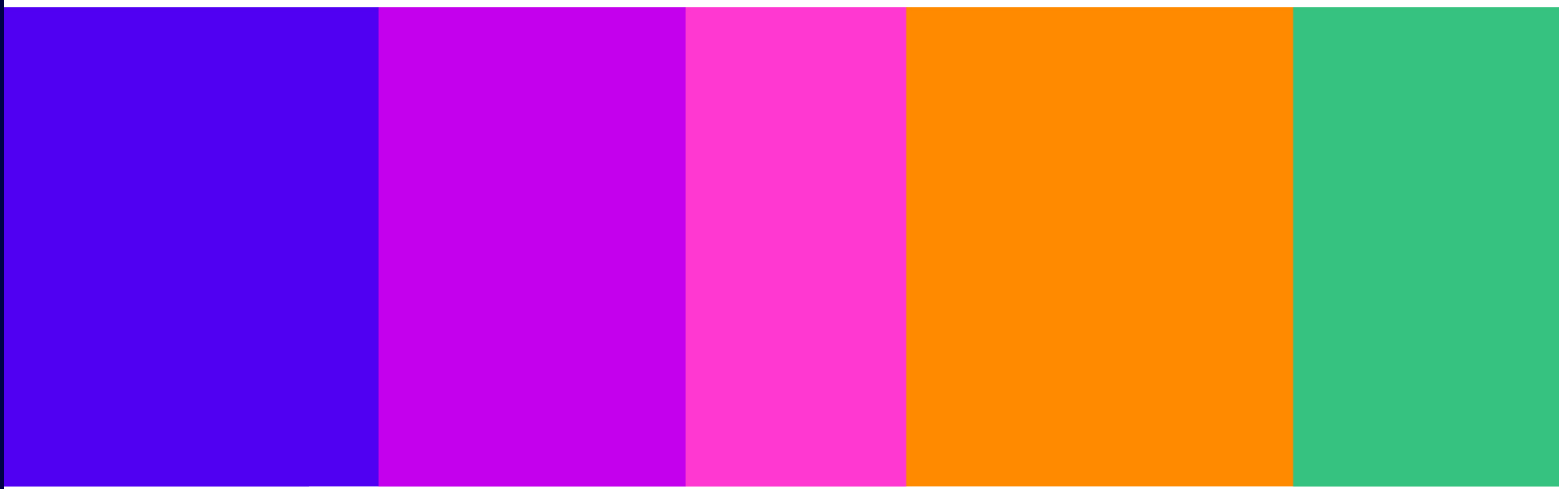


# Annex 3 – Ofcom’s Guidelines on Providing Television and On- Demand Access Services – Final changes

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This is a marked-up version. Additions we have made since consultation are highlighted in yellow (example), and omissions have been crossed out (example).



# Contents

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# 1. Introduction

- 1.1 Ofcom believes that TV and on-demand programmes 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<sup>1</sup>). These guidelines generally focus on the important 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’)<sup>2</sup> 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 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.

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<sup>1</sup> By ‘signing’ we mean when programmes are translated into or presented in sign-language. BSL is the most popular sign language in the United Kingdom.

<sup>2</sup> We have made available a list of notified [video on demand programme services](#).

## 2. General Guidance

### Understanding Audiences

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#### Audience Groups

- 2.1 Access to television and VoD services is crucial for enabling full participation in social and cultural life, and also plays a role in helping to combat loneliness<sup>3</sup>. ~~People with sight and/or hearing loss~~ **People with hearing loss and d/Deaf people, and people with sight loss and blind people,** 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<sup>4</sup>.
- 2.2 **People with hearing loss and d/Deaf people, and people with sight loss and blind people,** should be the primary focus in providing television access services to meet the statutory quotas<sup>5</sup>. However, we also encourage broadcasters and VoD providers to make their programmes more accessible to people with other disabilities<sup>6</sup>. For example, people with cognitive **and/or** neurodevelopmental **conditions** **and** **or** complex disabilities<sup>7</sup> may also benefit from the provision of access services<sup>8</sup>.
- 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<sup>9</sup>. Some research also suggests that subtitles may help to improve literacy levels for children **and those learning a new language**<sup>10</sup>.

#### 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 subtitles<sup>11</sup> **or signers**<sup>12</sup>) and choice for viewers (for example, by providing optional

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<sup>3</sup> For more information, see WaveLength's [About Loneliness](#) information campaign.

<sup>4</sup> For more information about sight and hearing loss see 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.

<sup>5</sup> See our [TV Access Services Code](#).

<sup>6</sup> See Accessibility Action Plans section of these Guidelines.

<sup>7</sup> For more information on complex disabilities, see Sense's [statistics on complex disabilities in the UK](#).

<sup>8</sup> **For more information on how access services benefit those with cognitive conditions, see RIDC's research report on Audience expectations of access services across TV and Video-on-Demand services.**

<sup>9</sup> For example, this [YouGov survey](#) from 2023, showed that 61% of 18-24 year olds prefer to have the subtitles switched on.

<sup>10</sup> See this [summary of research about subtitling and literacy by Turn on the Subtitles](#) **and this research discussion article** on the role of subtitling in foreign language learning.

<sup>11</sup> See the Subtitling section of these Guidelines.

<sup>12</sup> **See the Signing section of these Guidelines.**

introductions to audio described programmes<sup>13</sup>). 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 or automatic settings (where accessibility requirements are remembered) may help with this. Where data is collected in relation to a user's accessibility requirements, providers should be aware of their obligations under data protection legislation<sup>14</sup>.
- 2.6 Providers should aim to allow viewers to use multiple access services at the same time on a given programme.

## Developing Strategies

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### Accessibility Action Plans

- 2.7 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<sup>15</sup>. We remind providers that they are required to notify Ofcom of any such plans<sup>16</sup>.
- 2.8 The action plans should set out how providers intend to bring about progress in both the availability of accessibility features and in their quality and usability for disabled people. Providers should engage with relevant audiences in identifying priorities for improvement and in developing their plans.
- 2.9 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

- 2.10 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 the quality and quantity of accessible programming.
- 2.11 When acquiring or selling content, we encourage both providers and content suppliers to include access service files as part of acquiring or selling content. This may where it may help

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<sup>13</sup> See the Audio Introductions section of these Guidelines.

<sup>14</sup> The Information Commissioner's Office (ICO) is responsible for enforcing data protection legislation and providers should have regard to its guidance in this area. More information about the requirements of data protection legislation can be found on the ICO's [website](#).

<sup>15</sup> This is in line with our statutory duties: see our [TV Access Services Code](#) (2.3) and s368C(2) of the [Communications Act 2003](#).

<sup>16</sup> See our [TV Access Services Code](#) (7.2) and s368D(3)(zza) of the [Communications Act 2003](#).

to reduce duplication of work across industry and increase the availability of accessible content for viewers. Providers may need to edit some acquired files to ensure compatibility with their service and that quality standards are met. Including scripts and timings as part of access service files can help to reduce the amount of duplicated work.

- 2.12 Where access service files are not available with content, we still encourage providers to consider accessibility needs when negotiating deals, for example, by looking at whether additional signed versions of programmes can be created for broadcast or VoD platforms.
- 2.13 Beyond provision of the required access services, we encourage providers to consider more broadly how they can improve the accessibility of their programmes to disabled people. This can include interventions at all stages of programme-making; from making changes at production stage to providing additional accessibility features post-production. For example, we encourage providers to consider:
- Making programmes in Makaton (a language communication programme using symbols, signs and speech) for people of all ages with learning or communication difficulties<sup>17</sup>.
  - 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 programmes, including subtitling and dubbing.
  - Enhancing the dialogue audibility of programmes for people with hearing loss, and/ or providing options to customise sound levels (see the Subtitles section for more information).
  - Adopting additional means of making programmes more accessible to people with sight loss and blind people, such as use of integrated descriptions, audio introductions and audio/spoken subtitles (see the Audio Description section for more information).
  - Supporting advertisers to provide access services on adverts<sup>18</sup>.

## New Technologies

- 2.14 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 does not result in lower quality access services. Providers should assess new technologies against the principles in these guidelines and seek audience feedback to help determine their likely impact on quality.
- 2.15 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 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.

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<sup>17</sup> For more information, see the Makaton Charity's What is Makaton. Makaton is not to be confused with British Sign Language (BSL) which is a recognised language – see the Signing section of these Guidelines.

<sup>18</sup> For more information on accessible advertising, see ISBA's [Accessible Advertising Guide](#).

## Prioritising Programmes and Promoting Awareness

### Programme selection and scheduling

- 2.16 Broadcasters should not fulfil the statutory targets by scheduling multiple repeats of accessible programmes, as this will detract from the benefits of meeting the targets. Likewise we encourage VoD providers to ~~should~~ refresh their access services at least at the same rate at which they refresh content on their service more generally.
- 2.17 Providers should seek advice from disability groups/**experts and take account of audience preferences** 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 **programmes that are part of a series have** ~~a programme series begins with~~ access services, make every effort to ensure that all programmes in the given series are made accessible, **regardless of whether they appear on broadcast and/or on VoD services.**
  - **Make every effort to provide access services for programmes which include actors/participants with accessibility requirements.**

#### Guidance for VoD providers only:

Providers should make every effort to ensure that planned access services are added to on-demand programmes as soon as it is made available, particularly for popular programmes including boxsets. **For signed programmes, this means making a signed version of an on-demand programme available at the same time as the non-signed programme.** 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 platforms<sup>19</sup> 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

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<sup>19</sup> 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).

- 2.18 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 might include, for example, spoken warnings about potentially harmful flashing images, or audible signalling 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 in full. The subtitled information should preferably be in an open format<sup>20</sup> 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<sup>21</sup>

## Promoting awareness

- 2.19 Providers should ensure that their audiences are aware of access services, both as a general feature, and in relation to their availability on specific services, platforms and programmes. Providers should also support understanding of how to find programmes with access services (for example, via navigational tools and identifying symbols), along with information on how to use available customisation or personalisation features. Information should be easily discoverable for relevant audiences.
- 2.20 Providers should aim to promote awareness of any alternative accessible versions of a programme. For example, when an accessible version of a given programme is broadcast at a later time/date or uploaded to a VoD service.
- 2.21 Awareness should be promoted through a range of effective means, taking into account the full range of disabled audiences (for example, by including communications in sign-language or plain English).
- 2.22 This Means of communication might include:
- Periodic On-air announcements and on-screen text (in the case of broadcast channels)
  - promotional videos
  - information online and on social media (such as video tutorials)
  - information in emails to subscribers/ users or in publications aimed at people likely to benefit from access services.
- 2.23 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 that are ready to be

<sup>20</sup> Open captions are permanently visible on screen and cannot be turned on or off by the user.

<sup>21</sup> See [Section 336 \(1-3\) of the Act](#) and [7.2 of the TV Access Services Code](#).



implemented in case of interruptions to service, and that these take into account the affected audiences and their needs.

- 2.24 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. **Communication should take into account the audiences most likely to be affected, for example, when there is an outage of a signing service, communications should be made available in sign language.**
- 2.25 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 (for example subscription services), this information should be available before purchase.

## 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 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, **well-recognised** symbols or where appropriate, audible signals.

## Accessibility in production

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### Accessibility

- 2.26 We encourage providers and content makers to consider accessibility needs 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 such as scores in sports programmes, or ensuring that important on-

screen text in programmes is clearly visible, can make a significant difference for people with sight loss and blind people<sup>22</sup>.

- 2.27 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

- 2.28 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 at all stages in the making and distributing of programmes 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

- 2.29 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.

## Quality assessment

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### Monitoring

- 2.30 Providers should regularly monitor the quality of their access services, including against the specific goals included in their accessibility action plans. This should involve providers ensuring that processes are in place to review access service quality for pre-recorded content before transmission along with regular reviews after transmission. 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.
- 2.31 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 the Promoting Awareness section.
- 2.32 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.

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<sup>22</sup> See Audio Description section of these Guidelines.

## Seeking feedback

2.33 Understanding audience needs and preferences is important to offering 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. 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 the complaints process 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 and translated into sign-language.
- 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.

2.34 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;
- proactively seeking feedback via social media (for example, with polls);
- and user testing of features (for example, font types/ user interfaces).

2.35 Regardless of the method used, providers should ensure that their communications are made accessible so all relevant audiences can contribute their views (for example, by use of sign-language interpreters or alternative formats as appropriate).

## Other considerations

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### Compatibility with Assistive Technology

- 2.36 Providers should aim to make their programmes accessible to audiences who may be using assistive technologies such as screen readers and braille displays. This should include providing subtitles as timed text files rather than burnt into the video image. When on-screen text is read out (see paragraph 4.6), we encourage providers to subtitle it so that it can be accessed using assistive technologies. Where possible, providers should also consider making timed text scripts of the audio description available to the user as an alternative way to consume it.
- 2.37 More broadly, providers should consider how to make their user interfaces (e.g. websites and apps) accessible to those using assistive technologies.

### Editorial rules

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

### Equal opportunities legislation

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

# 3. Subtitling and related accessibility features

## What is subtitling?

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

## Audiences:

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- 3.2 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 ~~d/Deaf people~~, and those with severe hearing loss, subtitles are likely to be the most important source of information. Viewers with 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.
- 3.3 The varying needs of subtitle users make it difficult to provide subtitling that suits everybody – the guidelines below aim to reflect generally accepted best practice, but broadcasters should also bear in mind the target audience of given programmes.

## Selection and scheduling of programmes

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

## Ensuring quality:

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### Subtitles should be as accurate as possible

- 3.5 It is important that subtitles are as accurate as possible, so that viewers do not have their understanding or enjoyment of a programme harmed by inaccuracies. While the programme needs to comply with Ofcom's editorial rules<sup>23</sup>, the subtitles should not unnecessarily censor offensive language included in the dialogue.

**In general**, subtitles should be synchronised with the audio, and reflect the speech verbatim, as closely as possible

- 3.6 This can help audiences who use subtitling in conjunction with audio and visual cues, including by lip reading. **However, subtitles should also be readable and so some**

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<sup>23</sup> See [Ofcom's Broadcast Code](#).

paraphrasing may be appropriate in limited circumstances (for example, when the dialogue is very fast). It may also be appropriate to remove some filler words (for example, umms/ errs) where they do not carry meaning (for example, conveying a character's hesitation). Subtitles should not appear before key information is relayed; this is particularly important for punchline delivery, for example, in comedy programmes or quiz/ game shows. Subtitles should remain on-screen long enough to be read, while not hanging on-screen for so long that they are distracting or overrun shot changes, where avoidable<sup>24</sup>.

- 3.7 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<sup>conditions</sup>.
- 3.8 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

- 3.9 We recognise that this may be more challenging on certain types of programmes, such as fast-paced chat shows or sports programmes. However, providers should aim for a mean latency<sup>25</sup> of no more than 4.5 seconds across their live programming taken together.
- 3.10 As far as possible, subtitles should flow smoothly on the screen. 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. For certain programmes, where particularly important information is being relayed to audiences (such as emergency announcements or news), it may be appropriate to prioritise subtitling accuracy even if latency is higher. However, in general, 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 and making use of 'switchable delays' (i.e. allowing subtitles to shortcut delays inherent for audio and video during the coding, multiplexing and playout processes).
  - Reviewing, and where necessary editing, subtitling for repeated programmes first broadcast live.
  - Recognising that different subtitling methods (for example, respeaking, STTR<sup>26</sup> etc) may be better suited to different programme types depending on the speed of the dialogue and impact of the method on accuracy/ latency.

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<sup>24</sup> However, subtitles may need to over-run shot changes in some circumstances, e.g. when the dialogue overruns the shot change.

<sup>25</sup> By latency, we mean the time delay between the speech and live subtitles.

<sup>26</sup> Speech-To-Text-Reporters (STTRs) help people who are d/Deaf to access audio information by typing what is being said and the information appears on screen in real time for users to read.

## Sound effects and music should be clearly described

- 3.11 Unlike translation subtitles, subtitles for people with hearing loss and d/Deaf people should clearly describe relevant non-speech information, such as sound effects, the presence and mood of music, and tone of speech. Song lyrics should also be subtitled where possible and using the song title and artist's name can be a way of introducing songs. Unexpected pauses or inaudible dialogue should be indicated. Punctuation, italics or capitals may be commonly used to indicate emphasis or emotion, and symbols such as # or a musical note (♪) can indicate music.
- 3.12 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.
- 3.13 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 and direction of off-screen/off-camera speech where this is indicated by the audio but not obvious from the visible context.

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

- 3.14 Providers should use pre-prepared block<sup>27</sup> subtitles to support readability where possible in live programming and always in pre-recorded programmes.
- 3.15 Subtitle fonts, colours and sizes should be easy to read and clearly visible against the background<sup>28</sup>. Providers are encouraged to use antialiasing techniques to help make the appearance of subtitles clearer. Providers should make sure they use accessible fonts (such as Tiresias and Helvetica) which use simple shapes and characters that are not easily confused, including for similar characters (for example, capital i and lower case l) and letter characters that mirror each other (for example lower case b and d). Accessible fonts can be particularly important for some disabled audiences (for example, deafblind or dyslexic viewers). 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).
- 3.16 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 speaker's 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<sup>29</sup>.
- 3.17 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 (for example, larger font sizes are particularly important for deafblind people).

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<sup>27</sup> Subtitles that appear as one block of text rather than word-by-word.

<sup>28</sup> For more guidance on ensuring that subtitle colours have sufficient contrast to the background, see the [Web Content Accessibility Guidelines](#), including their colour contrast requirements.

<sup>29</sup> See Section 3 of the BBC's [subtitle guidelines](#) which includes more detailed advice on subtitle line breaks.

## Subtitles should be in the language used and preferred expected by the programme's intended audience for its spoken language in the UK

- 3.18 This is usually the same language as the main spoken language of the programme, ~~for example, we would expect Welsh language programmes to be subtitled in Welsh~~ where that language is used by the intended audience, but need not be the case where consultation with disabled users suggests a preference for a different language used by the UK audience (for example with some spoken Welsh programming where English subtitles may be preferred).
- 3.19 Foreign language programmes which would in any case be translated should be subtitled for a UK disabled audience (noting that subtitles for people who are d/Deaf or have hearing loss contain more information than translation subtitles).
- 3.20 The subtitles should aim to provide an equivalent experience by making clear when characters switch between languages in programmes and speak in foreign language which would otherwise not be translated.

## Other features

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- 3.21 Audiences may have different levels of hearing loss and can be assisted by features ~~either instead or as well as~~ other than subtitles. For example, enhancing dialogue audibility and/or providing options to customise sound levels in programmes (for example, relative volume of background noise) where possible<sup>30</sup>. We encourage providers to consider these features as they become feasible.
- 3.22 As outlined above, some audience groups may have a preference for slower subtitle speeds to aid with reading comprehension. VoD providers should consider offering play-back speed customisation to enable these audiences to slow down the pace of the programme and subtitles.

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<sup>30</sup> 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](#).



# 4. Audio description and related accessibility features

## What is audio description?

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- 4.1 Audio description (AD) is an additional audio commentary developed primarily to enable people who are blind **or have sight loss** ~~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 description<sup>31</sup> 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

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- 4.2 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<sup>32</sup>.
- 4.3 AD may also benefit people with cognitive ~~impairments~~ **conditions**, for example, people with autism may use it to help them to identify emotions or AD could be used to support language acquisition.
- 4.4 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 programmes

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- 4.5 People with sight loss **and blind people** 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 (for example, **dialogue-heavy news bulletins**).
- 4.6 Some types of programmes may better suit integrated description, which is where smaller changes are made to the original soundtrack to make it accessible to people with sight loss and blind people (for example, reading out on-screen text in quiz shows). Considering accessibility as part of the commissioning and production process can help to achieve this.

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<sup>31</sup> Where small changes are made to the original soundtrack to make it accessible to **people with sight loss and blind people** visually impaired audiences (e.g. reading out on-screen text in quiz shows).

<sup>32</sup> [Key statistics about sight loss](#), RNIB 2021.

- 4.7 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:

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

- 4.8 AD should be in the language used **expected** by the programme's intended audience ~~for its spoken language~~ **in the UK**. AD should describe the important 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 (for example, describing a shirt as ugly if this is key to a joke). **However, AD should avoid describing information that is clear from the dialogue and sound effects, such as door slams or gun shots.**
- 4.9 Key visual character features should be described as soon as practical. However, AD should avoid revealing details in advance (for example, character names) when the plot requires that they are withheld.
- 4.10 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 **and blind people** 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.
- 4.11 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).
- 4.12 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~~ **prioritise preserving** the main ~~soundtrack~~ **dialogue** followed by sound effects related to the plot, then other sound effects, background music and incidental speech (such as crowd chatter). **We note that there are some cases where the dialogue may need to be overlapped: for example** to read **translation** subtitles/ on-screen text, or if ~~really~~ necessary to convey relevant information **that may be of greater interest to audiences than the dialogue.** 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

- 4.13 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 online in advance of the main programme. They can be used to set the scene and describe relevant contextual information that cannot be picked up from listening to the programme, for example by describing in more detail the physical appearance of characters and/or the setting where the action will take place. Audio introductions may be most useful for specific genres of programmes with recurring characters such as TV series, dramas, and soaps.
  - *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.
- 4.14 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

- 4.15 Providers should create an appropriate balance in sound levels to ensure the audibility of both the AD and main soundtrack. Where possible, 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.
- 4.16 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

- 4.17 Providers should take account of the programme genre/type when developing the language and tone of AD and picking out details for description (for example, describing clothing may be particularly important in fashion-based shows).
- 4.18 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.
- 4.19 Providers should ensure that the language and style of AD for children's programmes are engaging and age appropriate.

## Describers should be appropriate for the genre

- 4.20 Describers' voices should be chosen to suit the genre, the nature of the programmes and the intended audience.
- 4.21 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.

# 5. Signing

## What is sign language?

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- 5.1 Sign languages are languages where people use hand gestures and movements, body language and facial expressions to communicate.
- 5.2 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 Government<sup>33</sup>), 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).
- 5.3 There are different forms of signed programmes:
- Sign-interpretation is when a programme in a different language (for example, 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 (for example, presenters, actors) use sign-language.

## Audiences:

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- 5.4 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.
- 5.5 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.
- 5.6 Sign language is also used more widely, including by family members of d/Deaf people and professional BSL users. Signed programmes may also help people who are learning the language.

## Selection and scheduling of programmes

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- 5.7 Both sign-interpreted and sign-presented programmes can be enjoyed by audiences:
- Sign-interpretation allows people to enjoy popular programmes made in other languages including English. It may be particularly important for news and current affairs programmes or programmes on catch-up series which have been signed on broadcast TV.
  - Sign-presented programmes allow 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

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<sup>33</sup> See the [2022 British Sign Language Act](#).

understand and enjoy programmes presented in sign language than those interpreted into sign language.

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

## Ensuring quality

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### BSL should be the default language for signed programmes.

- 5.11 Broadcasters should use BSL as default to meet the signing requirements<sup>34</sup>. However, broadcasters may consider using BSL or Irish Sign-Language for audiences in Northern Ireland

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

- 5.12 Sign-interpretation should be synchronised with the spoken language to the extent that is possible when translating between languages.
- 5.13 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.

- 5.14 Sign-interpretation should be accurate and easy to understand. Accuracy may be particularly important when important information is being conveyed (for example in news programmes) even if this means increased delays. 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. Interpreters should take account of regional variations in BSL.
- 5.15 Sign-language interpreters and presenters should be appropriately qualified, both to use sign language of native competency and to communicate effectively through television.
- 5.16 As far as possible, providers should keep the same signer(s) on each episode in a series. This is key to creating a sense of continuity for audiences when they are likely to watch multiple episodes back-to-back.

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<sup>34</sup> See the [TV Access Services Code](#) for more information on the signing targets.

## Signers should be clearly visible.

- 5.17 Sign-interpreters should be clearly visible against the background screen, for example by wearing plain (non-patterned) clothing of contrasting colour, and/or positioning the sign-interpreter outside of the programme's picture frame.
- 5.18 Interpreters should be large enough for their facial expressions, hand gestures and upper body to be easy to see and understand, while not obscuring key information on screen. We expect the sign-interpreter generally to Sign-interpreters generally appear on the right-hand side of the screen, and should 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 and the genre of the programme (including the amount/type of on-screen activity). We encourage providers to consider customisation tools to change the size of the signer where possible.
- 5.19 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.