Channel 4 submission – Ofcom consultation – 'Ensuring the quality of TV and on-demand access services

Introduction and Summary

Channel 4 has a strong commitment to access services and has consistently pushed the boundaries and driven change - both at Channel 4 and across the wider sector - to ensure that TV content is as accessible and inclusive as possible. We have routinely exceeded our requirements on linear, and we have continued to voluntarily increase our provision of access services on our on-demand services.

We support the objectives set out by Ofcom to make access services more widely available, particularly through on-demand platforms and welcome the opportunity to respond to this consultation.

Our key points for this submission are:

- We welcome Ofcom's focus on the quality as well as the quantity of access services but note the complexities involved. We greatly support the implementation of a biennial working group on access services quality and would be delighted to contribute to this workstream.

- We strongly support a move to focus on key audience outcomes, and Ofcom's recognition that a one size fits all approach to the format and presentation of access services is no longer appropriate, with a more nuanced approach required.

- We suggest further analysis and audience research is needed in some areas, including how additional reporting measures on the availability of access services to linear distribution chains can be adopted sustainably and how new suggestions such as more creative sound labelling in subtitles can be refined based on the needs and preferences of those services' target audiences in the UK.

- We greatly support the proposed changes concerning describing beyond the plot in audio description and would like to reinforce that meaningful progress in this area is contingent upon greater diversity among the teams doing the describing.

Question 1

C4C agrees that a 'one size fits all' approach to guidance on the format and presentation of access services is no longer viable (2.9). C4C also supports the move to focus on key outcomes for audiences.

C4C has some concerns about broadening the scope of the guidelines to include disabled people beyond those who are Deaf or have hearing loss or a visual impairment (2.11). Though supportive of the intention, we suggest broadcasters look to the guidelines for detailed advice on the core, regulated, "traditional" access services. They may not be the place for broader best-practice accessibility guidelines, which might be more appropriate in resources aimed at commissioners and production companies, rather than at the traditional post-production access services. Linking to our response to question four, point 4.29, it could also be appropriate for this resource to include specific guidance for programme makers to ensure all programmes and live events can be conceived with an inclusive design mindset and accessibility at heart. This, however, would be separate from guidelines around how to represent or portray the lived experience of disability, which remains an editorial choice. They might cover, for example, standardised best practice guides for how to film and edit performers or contributors who are using BSL. Or, how to write inclusive voice over scripts

As with the traditional access services best practice guidelines, these resources would need to be standardised, industry-wide guidelines created in collaboration with broadcasters and streamers, disabled audiences, disabled creatives and disability-led interest groups and relevant stakeholder charities. They would need to be supported by industry-wide comms and training, to ensure commissioners and producers were equipped and resourced to apply the guidelines, particularly when working with and for broadcasters and streamers who do not have in-house creative diversity resource to support them. We would suggest Ofcom consult with the TV Access Project, an alliance of ten broadcasters and streamers working primarily towards better disability inclusion behind the camera, which is where much of the centralised activity around disability inclusion in the broadcast industry is currently taking place.

C4C supports the expectation of a certain standard of quality for access services programming to qualify under the statutory quota, though it has some concerns about how practical this will be to implement and assess (2.12). Moreover, C4C greatly supports the implementation of a biennial working group on access services quality and would be delighted to contribute to this workstream.

Question 2

C4C agrees on the importance of access services being of sufficiently high quality but suggests that this level of sufficient quality is far easier to define when dealing with subtitles: audio description, sign interpretation, and sign presentation are far more subjective (3.2). There needs to be scope to explore greater creativity of delivery in ways that could enhance the user experience, innovating beyond the traditional modes of delivering AD and signing. In addition, there is a risk that a greater focus on quality risks diminishing any gains made in providers sharing access services files with each other and with production companies selling their content elsewhere. As discussed further on in response to 4.14, passing acquired access services files on to viewers, rather than those created by a provider for a known audience, while beneficial for volumes and broader accessibility, does come with a risk of diluting quality by taking on the responsibility for the quality of files that are of potentially unknown provenance.

C4C agrees on the importance of communicating effectively with affected audiences in the event of a disruption to access services availability (3.3). Building on the foundations laid out in our response to Ofcom's investigation in relation to the September 2021 outage of Channel 4 (set out in Ofcom's Decision dated 20th June 2022), C4C is currently exploring additional measures to address on-air provision of such information, including, for example, pre-recorded messages that can be played out around signed content in the event of a disruption to our transmission of pre-recorded and live sign-interpreted programmes.

C4C understands the reasoning for the clarification in 3.4, but nonetheless think the implementation might be problematic to roll out across the board. Changing the regular linear reporting of access services to be distributor-specific would significantly increase logging and reporting. C4C suggests further analysis is needed on whether and how this aim could be implemented and sustainably adopted by broadcasters and other providers.

Finally, C4C supports the clarifications in 3.6 and 3.7.

Question 3

C4C firmly believes in making programming accessible to as wide an audience as possible and so welcomes the clarifications around the benefits of access services to people beyond the core beneficiaries (4.2). However, it is important to keep in mind the principal audiences the services are being created for. This has particular relevance when considering other areas this consultation seeks to explore, for example, measuring quality (because high quality for a Deaf viewer might differ from what is high quality for a neurodivergent viewer).

On customisation, C4C would go further than saying that the possibilities for offering customisation options on traditional broadcast television are "limited" (4.7): C4C suggests this is something that would be out of the hand of broadcasters and providers and would instead need to be explored in conjunction with device

manufacturers. While C4C is interested in the limited examples of object-based media being used as a proof of concept, such as enabling viewers to create their own audio mix on one bespoke episode, we are not yet aware of these solutions being employed sustainably across large catalogues of content and suggest that, for the time being, the costs involved in creating and processing the additional audio streams might be a barrier to their wider adoption. C4C is familiar with some examples of separating out access services, such as audio description, and finds this an interesting proposition to be explored further in the future (4.8). C4C already retains accessibility settings on a user's local device and continues to explore how to best deliver account-level preferences (4.9). However, it could be worth exploring whether Ofcom can extend these recommendations to device manufacturers to ensure that preferences are retained across different services on the same device, ensuring a seamless user experience. Finally, C4C is pleased to see the inclusion of data on wider usage and hopes that this will encourage all broadcasters to continue to consider the importance of subtitles when looking at all content types and not just television and on-demand programming (4.11).

While C4C welcomes the encouragement to include access services in content acquisition deals (4.14), it is worth pointing out that there are some inherent practical challenges here that might temper the ambition. First, there remains a wide disparity in file formats across different broadcasters and service providers, both within the UK and when widening the scope to include content originated in other countries. Second, the picture is complicated further when considering that the new or "acquiring" platform would be responsible for the quality of the access service files sourced from elsewhere, both from an editorial perspective and when considering matters of compliance with UK guidelines. The costs and lengthy processes that might be required to conform technically and editorially correct pre-existing files can often approach those of creating new access service files from scratch (with the knowledge that the new files have been created exactly to the acquiring platform's own specification). C4C agrees with the points made in 4.15 to 4.18. The Makaton example in 4.19 is interesting; however, C4C feels it might cause confusion: it is vital to be consistent in terms of what contributes to sign-language targets, particularly in light of the information in 7.2 to 7.5, on removing confusion between BSL and sign-supported communication systems. C4C welcomes the addition of guidance on developing accessibility action plans (4.21).

Although C4C agrees with the RNID that "moments of national importance" could lack clarity, we feel this could be made clearer by expanding the definition to moments or events that are of major brand importance to the provider. This would presumably cover the example of a nationally important event (the funeral of Her Majesty Queen Elizabeth II), but also mean that providers are encouraged to think more broadly than a single and possibly narrow definition of what national importance is, instead seeking to make each arm of its programming accessible, whether that be in high-profile shows that define its brand purpose or in specially curated collections of programmes that are centred around specific events (such as Black History Month), ensuring that any definition is representative of the genre interests of different age groups and diverse audiences. From a user's perspective, such a shift in guidance would mean that each of the diverse providers in the UK would be making accessible their own iterations of what they view as nationally important, thus offering a broader spectrum of accessible programming to viewers. C4C welcomes the encouragement in 4.25 to 4.27 and in the last year has made great strides in delivering access services in line with the release of on-demand content, across all programme types, including box set release of linear titles and the acquisition of full series destined for on-demand release. C4C welcomes the guidance of Ofcom, and user groups such as RNID and RNIB, to help prioritise the roll-out of access services and accessibility measures on on-demand platforms (4.28).

C4C supports the ambition to ensure that broadcast information about national emergencies is accessible (4.29), however suggests that some of the guidance, particularly around ensuring such emergency announcements are accessible to blind and visually impaired audiences, might be better woven into the creation of the announcement content itself, rather than that content being given audio description created by a service provider or broadcaster. An important emergency announcement is unlikely to be designed with sufficient space to convey any unspoken onscreen information via audio description, and equally, depending on the nature of the emergency, it might be impractical to produce an audio description file in time (as opportunities for broadcasting live audio description are limited).

C4C welcomes the additions in 4.32 to 4.34 and is exploring how best to engage in continued and meaningful dialogue with its relevant access service audiences. Recently, this has included implementing specific BSL messaging via prerecorded idents during out BSL zone in the late-night schedule. In reference to 4.34, C4C is committed to ensuring content is discoverable through search and filtering options, including accessible programming. There are ongoing efforts to improve and extend this to as wide an audience as possible.

C4C supports the additions in 4.36 to 4.37 and would go further, suggesting that this collaboration can extend to the scheduling decisions taken around audio described and sign-interpreted programmes, where those programmes might have specific relevance to the audiences those services are aimed at, for example ensuring that the experience of the Deaf BSL-using audience is thought about adequately and to the fore, where a high-profile programme features a prominent Deaf BSL-using contributor. C4C firmly supports the call for greater diversity among the teams creating access services and has been working with its access service provider on this area (4.38 to 4.39).

C4C supports the additions outlined in 4.41 to 4.43 and regularly carries out both proactive monitoring of access services quality and reactive checking and issue resolution following feedback from linear and on-demand viewers. On the addition of 4.44, C4C notes the requirement in the Television Technical Performance Code to ensure that the presence and reliability of access services is given the same priority as the vision and sound components of programmes.

In terms of 4.45 to 4.46, this year C4C has implemented a route for viewers to contact us using BSL, and continues to monitor its feedback and complaint routes to ensure they are accessible at all points in the process. As previously stated, C4C is exploring how best to engage with service users directly to seek qualitative feedback on access service output and on wider matters (4.47).

Question 4

C4C believes that the continuing improvement of Automatic Speech Recognition (ASR) means that, in time, more providers could create and deliver subtitles using automated methods. This may allow additional online services to be delivered in an accessible way with greater agility and flexibility, and potentially reduced latency for live programming. C4C continues to explore the quality limitations and other practical issues around automated subtitling, with a view to how this technology could benefit its operation in the future.

C4C has some limited experience of working with automated voicing to deliver lower-cost audio description and feels that, as this technology improves (both the voices themselves and how effectively they can integrate into existing team and workflow setups), this could be a way of more efficiently scaling up AD volumes. Although it is worth adding the caveat that often the potential savings of not using a human voicer can be offset by the additional checking of the automated voice's output to correct pronunciation, for example. Something that is also likely to be used more in the future is using existing information from a programme's soundtrack or subtitle file to "direct" an audio description scripter towards gaps in the dialogue where descriptions might be placed, to speed up the description process on very light content. Technological development and innovation in this area is key in being able to enhance the experience of AD users, particularly around large-volume content deals on non-linear platforms.

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Question 5

C4C welcomes the inclusion of a wide range of external sources in Annex 3, including good reprIssue when esentation from the areas of industry, research, and user groups.

Question 6

C4C supports the proposed changes on subtitling speeds (5.2 to 5.6) and on live programming (5.7 to 5.11).

Similarly, C4C supports the proposed replacements on subtitle presentation covered in 5.12 to 5.15. Subtitle customisation (5.16 to 5.18) is a potential improvement to our future player experience, with investigations ongoing on how best to achieve and deliver this.

C4C applauds the positive coverage achieved by the Netflix example used in 5.19, but cautions that further research is needed among UK audiences and specifically with Deaf and hearing impaired respondents before changing the guidance to make sound labels more descriptive and creative.

C4C agrees with the proposed addition of 5.20.

Question 7

C4C has no further comments about the other proposed changes to the subtitling guidelines.

Question 8

C4C does not think anything additional should be added to the revised guidelines on subtitling.

Question 9

C4C welcomes the expansion of Ofcom's audio description style direction (6.2) and supports the call for greater research among the UK's audio description audiences (6.4). A balance needs to be struck between what international test subjects reported when viewing different content types in lab conditions and what kind of audio description UK audiences are expecting when relaxing and consuming content in their own homes. There is an added complication in that trying to make audio description creative and immersive sometimes fails as a result of being largely created one step removed from the programme's production process: thus, it might be more impactful to encourage programme makers to consider ways of enhancing the audio description at the commission and production stage (as outlined at 4.36). With 6.3, C4C suggests that not many providers are likely in practical terms to commit resource to making multiple different forms of audio description available for the same content, when that resource could be put towards making more programmes available with audio description. It is also vital to consider if these new and experimental forms of audio description can contribute to volume quotas. In practice, some of these initiatives might be better suited to small-scale artistic ventures rather than large content providers and broadcasters.

C4C has in-house first-hand experience of the recent conversations and industry developments around describing beyond the plot (6.5 to 6.6) and greatly supports these proposed changes. C4C has supported its access service provider in developing training for new and existing describer staff on these aspects of describing visual information that might have been ignored in the past and would like to reinforce that meaningful progress in this area is contingent upon greater diversity among the teams doing the describing (as at 4.38 to 4.39).

C4C supports the proposed addition concerning integrated descriptions (6.9 to 6.11) and has begun exploring the RNIB's research on how this can apply to sports programming. It is worth pointing out that foreign-language segments in news programmes comes with additional challenges both in terms of production turnaround of news packages in the fast-paced world of live news and in terms of sourcing adequate and authentic voice talent for those contributors being dubbed, particularly where vocal representation is concerned. Nonetheless, C4C continues to explore this area.

Question 10

C4C would point out that it is important to clarify whether programmes with some integrated description, such as news or other genres, as outlined at 6.8 to 6.11, would be eligible to count towards audio description quotas if they were deemed to be accessible to the intended audiences.

On customisation options allowing audiences to adjust the balance between the AD and the main soundtrack, C4C understands the importance of flexibility of sound levels to AD audiences and plans to investigate how viable this level of customisation would be on its large AD library. However, given that many platforms present the AD as a second premixed track rather than overlaying an AD-only track, it is suggested that this could be a complex project for many providers.

Question 11

C4C does not think anything additional should be added to the revised guidelines on audio description.

Question 12

C4C supports the proposed change outlined in 7.2 to 7.5.

With 7.6 to 7.8, C4C wishes to reiterate the points made earlier around scheduling sign-interpreted programming based on curating a selection of signed content that is reflective of the provider's broader brand and cultural direction, as well as ensuring this takes into account continuity with onscreen contributors who are Deaf and particularly where they are BSL users. In terms of 7.10, C4C supports greater experimentation in this regard and has recently begun scheduling signed content in some 11pm slots and also in pre-9am slots on weekdays and Saturdays. C4C will continue to engage with audiences and internal stakeholders to inform future scheduling decisions.

C4C is firmly committed to greater onscreen disability representation across the board, including representation of BSL (7.11) and believes in the value of these opportunities in demonstrating good and joined-up approaches to access services scheduling and other on-air support. We regularly feature contributors and performers who use BSL giving prominent representation of the Deaf community, including in the 2023 series of Channel 4's flagship show, *The Great British Bake Off*, which features a Deaf contestant who uses BSL.

C4C continues to engage with our access services supplier and with programme makers and commissioners around the points raised in 7.12 to 7.16 and supports these proposed additions.

Question 13

C4C has no further comments about the other proposed changes to the signing guidelines.

Question 14

C4C does not think anything additional should be added to the revised guidelines on signing.