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# Ofcom's Guidelines on the Provision of Television Access Services

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# Guidelines on the provision of television access services

## General

- 1.1 Broadcasters licensed in the United Kingdom that are providing television access services (subtitling, signing and audio description) should have regard to these Guidelines, whether or not they are subject to the Code on Television Access Services. All broadcasters are requested to have regard to paragraph 1.9.

## Users

- 1.2 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 the deafblind) may benefit from more than one access service – certain conditions that lead to the loss of one sense may also impair another<sup>1</sup>. 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 scheduling of programmes

- 1.3 In selecting and scheduling programmes, broadcasters should seek advice from disability groups about how best to maximise the benefits to those with hearing and/or sight impairments.
- 1.4 When a series of programmes commences with access services, every effort should be made to ensure that all programmes in the series are accompanied by the relevant access services. If unforeseen problems prevent this, and a repeat is scheduled in the near future, a continuity announcement should be made (and subtitled) explaining when the repeat can be seen with the appropriate access services. An on-air apology should also be broadcast, preferably both before and after the programme. If this is not possible, because a technical fault does not come to light until after the programme has been broadcast, an apology should be broadcast at the beginning of the next programme in the series.

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<sup>1</sup> People with Usher syndrome are born deaf or hard of hearing then start to have problems with their sight in adolescence, typically developing tunnel vision. However, many people with Usher have reasonably good central vision.

- 1.5 Ofcom encourages broadcasters not to seek to fulfil their obligations by scheduling multiple repeats of programmes with access services, as this will detract from the benefit of providing access services to users.

## Monitoring for consistency and quality

- 1.6 Broadcasters should monitor playout at regular intervals 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. Where practicable, broadcasters should insert an apology (either spoken or subtitled, as appropriate) as soon as a problem has been identified, with a brief explanation of the cause.
- 1.7 Broadcasters should also regularly monitor the quality of their access services. Focus groups and feedback from individual viewers can be a helpful indicators of quality.

## Consultation and feedback

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

## National emergencies

- 1.9 In order that access service users are kept informed about national and local emergencies, it is important that broadcast information, including relevant telephone numbers, is subtitled (preferably in open captions) leaving sufficient time to write the details down and spoken.

## Reference material

- 1.10 While Ofcom is not responsible for the content of external websites, broadcasters and access service providers may find it helpful to consult the following reference material:
- the [former ITC guidelines](#), which provide examples of both good and bad practice the RNIB's [guidance on improving accessibility to programming for visually-impaired people](#), including audio description for children's programmes
  - the BBC's Guidelines for [visually-impaired television audiences](#);
  - [Incidental music and effects – a note for broadcasters](#), Hearing Concern;
  - A [new font for digital television subtitles](#) –Janet Silver, John Gill, Christopher Sharville, James Slater and Michael Martin; and
  - [Deaf children and television](#), National Deaf Children's Society

## Equal Opportunities Legislation

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

## Subtitling

### What is subtitling?

- 1.12 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

- 1.13 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 television 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 the deaf, and those suffering severe hearing loss, subtitles are likely to be the most important source of audio information. Viewers with a mild hearing loss 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 scheduling of programmes

- 1.14 Broadcasters with limited quotas (e.g. 10%) should give priority to the most popular programmes, as subtitling on these is likely to benefit most people. Broadcasters 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, many of whom watch television a lot. As quotas grow, the emphasis of programme selection and scheduling should shift towards subtitling a broader range of programmes appealing to different types of viewer.

### Best practice

- 1.15 Presentation: subtitling should use the Tiresias Screenfont for all subtitles. Subtitles on standard definition DTT services 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. Although Ofcom does not regulate equipment used to render subtitles in cable and satellite services, Ofcom also recommends that cable and satellite platform providers adhere to the same standards. Broadcasters 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 conveys emotions and tone of voice, as well as being necessary for lip-reading.

- 1.16 Pre-recorded and live subtitles: pre-prepared block subtitles are the best approach to providing accurate, easily legible and well-synchronised subtitles and should be used for pre-recorded programmes. Recommended colours are white, yellow, cyan and green against a solid black background as these provide the best contrast. When scrolling subtitles need to be used, any scripted material should be used for advance preparation. In addition to achieving the highest possible levels of accuracy and synchronisation, live subtitles should flow continuously and smoothly.
- 1.17 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.
- 1.18 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.
- 1.19 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. In live programmes, the aim should be to keep the inevitable delay in subtitle presentation to the minimum (no more than 3 seconds) consistent with accurate presentation of what is being said. If possible, subtitles should not over run shot changes and should commence on a shot change when synchronous with the start of speech.
- 1.20 Speed of subtitling: the speed should not normally exceed 160 to 180 words per minutes for pre-recorded programmes. Although it may not be practicable to restrict the speed of subtitles for all live programmes, 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.

- 1.21 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. Broadcasters should ensure that subtitles for pre-recorded programmes are reviewed for accuracy before transmission. Where live subtitling is to be provided, advance preparation is vital – where possible, any scripted material should be obtained, and special vocabulary should be prepared. The subtitling for repeated programmes first broadcast live should be reviewed and edited if necessary.
- 1.22 Publicity: the word ‘Subtitles’ should be displayed legibly on the screen at the start of the programme.

## Audio description

### What is audio description?

- 1.23 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

- 1.24 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 generation. 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 scheduling of programmes

- 1.25 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

- 1.26 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.
- 1.27 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.
- 1.28 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.
- 1.29 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.
- 1.30 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.
- 1.31 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 where there is a reprise of the lyrics and where the lyrics are not relevant to the storyline.

- 1.32 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.
- 1.33 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.
- 1.34 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.
- 1.35 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.
- 1.36 Children's programmes: Language and pace of delivery for children's TV 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.
- 1.37 Publicity: periodic announcements should be made about programmes with audio description.
- 1.38 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.

## Signing

### What is sign language?

- 1.39 Sign language comprises the use of manual gestures, facial expression and body language to convey meaning. British Sign Language (BSL) is the most popular sign language in the United Kingdom. This is a distinct language (recognised as such by the Government) with different syntax and vocabulary from English. In addition to different forms of sign language in other countries, Sign Supported English (which tends to follow the syntax and vocabulary of English) and Makaton (a language programme using elements of BSL as well as symbols and speech) are also used in the UK.

### Users

- 1.40 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 programming.

### Best practice

- 1.41 Language: BSL should be the default language for signed programmes. However, broadcasters may also use other forms of sign language (e.g. Makaton for children's programmes, or 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.
- 1.42 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.
- 1.43 Signers: sign language presenters, reporters and interpreters should be appropriately qualified, both to use sign language of native competency, and to communicate effectively through television. Some latitude is allowed for guests and interviewees, though broadcasters should ensure that 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.

- 1.44 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.
- 1.45 Techniques: the signer should use appropriate techniques to indicate whose speech he or she is interpreting, and to draw attention to significant sound effects.
- 1.46 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. For example, broadcasters may choose to use interactive services to provide a signed version of a programme simultaneously with an unsigned version, provided the interactive option is publicised at the beginning of the programme, is full-screen and complies with the standards set out in these guidelines. Broadcasters may also use 'closed' signing should this become feasible. However, the requirement for accessibility would preclude the use of IPTV to provide signed programmes, unless viewers had the necessary equipment or were provided with it free-of-charge. In any case, broadcasters who wish to use new forms of delivery should consult Ofcom and disability groups first.