Defining progress for Access Services on Video on Demand (VOD)

April 2015
Defining Progress

Access Services on VOD

Introduction

The technology used to view television is changing, but the availability of access services such as subtitles, signing and audio description is not keeping up. Sensory loss charities Action on Hearing Loss, Sense and RNIB are calling on the Department for Culture, Media and Sport (DCMS) to adopt specific measures to ensure the accessibility of Video on Demand (VOD) services when they come to review progress in this area in 2016. This document sets out these progress measures aimed at the whole of the VOD industry. Ultimately, access services must be an integral part of VOD content, rather than something to be added on. It is essential that VOD services are as accessible as traditional (or linear) television services.

Definitions of key terms are available at the end of this document.

Digital exclusion for people with sensory loss

People with sensory impairments are reliant on access services such as audio description, subtitles and signing to understand and enjoy a television programme. As the choice of how and where we watch television increases, consumers expect to be able to access content to suit their viewing preferences. People with hearing, sight and dual sensory loss are being largely excluded from these new ways of watching TV. Access hasn’t kept up with technological developments, and while broadcasters are required to meet quotas for subtitles, audio description and signing on their traditional television channels, no such quotas exist for VOD services.

A survey carried out by sensory loss charities found that many people with hearing and/or sight loss watch VOD content from their TV. However, a report by the regulator, the Authority for Television on Demand (ATVOD), revealed that very little accessible VOD content is currently available through the major television platforms such as Virgin or Sky. Only 3.5% of Sky VOD content is subtitled and 0.4% has audio description and other VOD platforms such as BT Vision and Virgin don’t provide any access services. Content providers such as Discovery and Disney don’t provide any access services and many more, such as Demand Five and UKTV, provide no audio description.

Watching on other devices such as computers, smartphones, tablets and games consoles is becoming popular, but again, this content is broadly inaccessible. And yet, according to a report published by ATVOD, ‘For on-demand content there are no insuperable barriers to providing subtitles for hard of hearing people or audio description for blind and partially sighted users’.

Progress measures

In July 2013 DCMS announced that they would work with ATVOD to increase the levels of access services for on-demand content and that they would monitor progress through the ATVOD annual survey. They stated that “if it is clear that progress isn’t being made in three years’ time – a reasonable timeframe in our view – we will consider legislation”.

This document aims to support DCMS in defining what progress should look like by July 2016. It is hoped that DCMS will work with the co-regulators, ATVOD and Ofcom, as well as the VOD industry to communicate and gather evidence against the indicators outlined below, and actively press for progress. These measures have been developed following engagement with people with sensory impairment.

1 Provision of video on demand access services – 2014 Report (ATVOD 2014)
2 ibid
3 ATVOD working group on access services (Tanton 2014)
4 Some organisations provide more than one service, for example, Sky is both a content provider and a platform operator.
Progress measures for the whole VOD industry

It is recognised that there is a complex supply chain for VOD services in delivering a seamless experience for viewers. Content providers (e.g. ITV and Channel 4), platform operators (e.g. Sky and Virgin), device manufacturers (e.g. Apple and Samsung), and major movie on demand providers (e.g. Netflix and Amazon) - not all of whom are based in the UK - all play an important part in ensuring that access services are available to the viewer. ATVOD has identified a number of key target services in this area and progress with these will have a significant impact on many viewers. The progress measures below are therefore aimed at the whole of the VOD industry.

**Strategy and approach**

- By the end of 2015 all to produce a publically available statement on plans for ensuring access services are being made available, including timetabled milestones.
- Continue to co-operate and engage with other industry organisations and wider stakeholders on access services, including through the ATVOD Working Group on Access Services, the ATVOD annual survey and its wider work.

**Practice and standards**

- Demonstrate a commitment to good practice guidelines across their services, including ATVOD best practice guidelines by July 2016.
- Ensure all content with access services is clearly and correctly advertised to viewers and is easily searchable.
- Develop and adopt industry standards for access services to ensure that files can be easily shared, such as those recommended by the ATVOD Working Group on Access Services, in particular:
  - By July 2016, adopt EBU-TT format for subtitling or
  - demonstrate how any alternative approach is able to deliver subtitles across platforms
  - By September 2015, ensure pre-existing access service assets for content are catalogued and free at the point of content exchange
  - During 2015, work to develop cross industry standards for audio description and then start the delivery of audio described services

**Innovation in the user experience**

It is important that the industry continues to innovate and to find creative solutions to improve accessibility for people with sensory impairments. In particular, we are keen to see the developments build on what we already know is possible, with personalised display options for subtitles as well as the provision of access services for short form video clips on websites (such as those on news websites).

Progress measures for Video on Demand Service Providers

**Subtitles**

*Broadcasters subject to Ofcom quotas for subtitling on linear television*

- By July 2016, broadcasters should deliver 100% of their linear quota on their VOD services through their own brand website
- By July 2016, broadcasters should deliver 70% of their linear quota on the third party platforms and devices where most viewers are accessing their VOD services

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5 ATVOD working group on access services (Tanton 2014)
6 EBU-TT stands for European Broadcasting Union Timed Text - a subtitle file format
7 ATVOD’s Provision of Video on Demand Access Services 2014 report shows that access to subtitles on own brand websites is already rapidly improving, with 4OD, Demand 5 and ITV Player respectively offering 65%, 72% and 74% of their total programme hours with subtitles
8 This should be based on each broadcaster’s own information about where most of their VOD content is being viewed, for example on Sky, Virgin or You View.
Defining Progress

VOD services not covered by Ofcom quotas for subtitling
• By July 2016, other VOD services (as listed by ATVOD⁹), should ensure 50% of content has subtitles. This relates to both when content is viewed via their own brand website/platform and via the third party platforms and devices where most viewers are accessing their services.

Audio description
• Catch up services provided by TV broadcasters subject to Ofcom quotas should deliver 50% of the current level of AD they provide on linear TV on their VOD services by July 2016, through their own brand websites, as well as on their services on the most popular devices and platforms. All other VOD services should be achieving similar levels to the above services by January 2017.

Signing
• Catch up services provided by TV broadcasters subject to Ofcom quotas should deliver this quota for signing on their VOD services by July 2016; with other services making an appropriate contribution to the British Sign Language Broadcasting Trust.

Progress measures for VOD Platform Operators (including Sky, Virgin and YouView) and device manufacturers
• Ensure platforms and devices can support industry standard access service assets by July 2016 and make this known to their VOD clients.

DCMS
If the Government’s strategy is to be successful then the developing VOD industry will need support, encouragement and at times cajoling to ensure progress in the provision of access services. The co-regulators have a continued role to play to ensure access services remain a priority. However there is also a need for DCMS to provide leadership and support. In particular we believe DCMS should:

• Set the expectation to industry that the actions in this document need to be achieved and monitor progress.
• Build an evidence base of the value of access services to consumers and industry.
• Draft legislation requiring access services on VOD content during 2016, setting measures taking us beyond July 2016, resulting in ultimate parity of access for people with sensory loss.
• Seek opportunities to ensure progress and developments to increase the availability of access services in the UK are matched at a pan European level, for instance through the revision of EU legislation.

Find out more
Please contact us for further information and advice on improving access to Video on Demand.

Action on Hearing Loss campaigns@hearingloss.org.uk
RNIB broadcasting@rnib.org.uk
Sense info@sense.org.uk

⁹ ATVOD list their target VOD services in a December 2014 news release. These are Amazon Instant Video, Blinkbox, Channel 4, Channel 5, Comedy Central, Discovery, Disney, FilmFlex, Fox, ITV, MTV, Nickelodeon, Picturebox, Sainsbury’s Entertainment, Sky, UKTV and Universal, as well as the platforms Sky, Virgin and YouView.
Definition of key terms

**Audio description**
Commentary that describes body language, expressions and movements, making the programme clear for people with sight loss.

**Catch Up TV**
This is VOD in which TV shows are available for a period of days after the original broadcast. (e.g. ITV Player and 4oD)

**Linear TV**
The viewer has to watch a scheduled TV programme at a particular time and on a particular channel (e.g. BBC 1 and ITV). It includes terrestrial broadcasts, satellite or cable.

**Ofcom quotas**
The Communications Act requires linear channels to provide access services on their content. They have 10 years to reach 80% subtitling, 10% audio description and 5% signing from the time specified in the act or from the time they start broadcasting. The regulator, Ofcom, can grant exemptions to certain channels in relation to one or more of the access services. These quotas apply only to linear TV, not VOD.

**Platform**
BT Vision and Sky are both examples of a platform. They are a means of aggregating, hosting and delivering VOD services.

**Video on Demand (VOD)**
This is any video content where users can access it at any time of their own choosing. This does not include time-shifted programmes, such as those recorded and watched at a later date.