

Your response

Question	Your response
<p>Question 1: Do you have any comments on our proposed approach to making these changes?</p>	<p><i>Is this response confidential? – N</i></p> <p>We welcome the move towards principles and outcomes. We also welcome the opportunity to participate in the proposed working group on access services. We look forward to seeing the results of the qualitative research study.</p> <p>We also feel it is important that the guidelines remain flexible to allow for the evolution of technology and changes in audience expectations.</p> <p>ITV appreciates that the quality and nature of access services impact the perception and enjoyment of TV shows by all audiences. In this respect, broadcasters and on-demand service providers are best placed to understand the needs of all their audiences and to ensure output meets expectations. Ofcom's guidelines should, by design, not detract from the ability of providers to evolve and innovate to enable the best possible viewing experiences for all audiences.</p>
<p>Question 2: Do you have any comments on our proposed additions to the TV Access Services Code?</p>	<p><i>Is this response confidential? – N</i></p> <p>We are supportive of the proposed additions.</p>
<p>Question 3: Do you have any comments on any of the following proposed changes/additions? Please provide any additional evidence you think we should take into account.</p> <ul style="list-style-type: none"> • Understanding audiences • Developing strategies • Programme selection and scheduling • National emergencies and important on-screen information • Promoting awareness • Accessibility and diversity in production 	<p><i>Is this response confidential? – N</i></p> <p>On “Proposed addition: Providers should make their programming more accessible to people with other disabilities (beyond people with sight and/or hearing loss)”, we think this question should be taken forward with the working group to understand the intended approach and to ensure proportionality and consistency of audience experience.</p> <p>On “Proposed addition: Providers should offer customisation options and choice for viewers</p>

- Training
- Monitoring of quality

where practical, while also ensuring these services are easy to use”, we support the idea that customisation of font size should be offered where practical and where the underlying platforms and middleware support it.

On “Proposed addition: Providers should increase access service provision as far as possible, while considering how best to balance their investment between quality and quantity of accessible programming”, we believe the provision quantity levels are already clearly set out in the Code on Television Access Services. ITV bases its investment decisions on what is best for our audiences. We will continue to prioritise our investment into the development of accessibility and access services where it is likely to have the most positive audience impact for the cost involved.

On “Proposed addition: providers should ensure that the use of new technologies enhances the quality of access services”, we believe this should be amended to “ensure that new technologies that are adopted continue to deliver an appropriate level of quality of access services” or similar. Some new technology adoption may not be directly linked to quality and we do not think it would be helpful to place any restrictions on innovation through a need to “enhance” quality beyond levels already prescribed.

On Proposed addition: Providers should prioritise making occasions of national importance accessible with subtitling, signing and spoken descriptions”, ITV does not currently have a permanent capability for live BSL translation. However, where possible we use best endeavours to make such events accessible at the earliest opportunity. In deciding how to prioritise providing access services for events of national importance, we take account of whether coverage of the event is made available with subtitles, signing and/or audio description via other providers such as the BBC, and therefore, whether provision by ITV would replicate or be additive to audiences’ experience. For these reasons, we think this should be left slightly more open – “prioritise making occasions of national importance accessible”.

	<p>On “<i>Proposed addition: Providers should make every effort to add access services to on-demand programming as soon as it is made available</i>”, we suggest “Providers should, wherever possible, add access services...”. We would note that, on occasion, there can be a very short delay with access services on Late and Live content, where the turnaround times are very tight. We endeavour to keep any such delay to an absolute minimum, without delaying the actual publication of the content to the whole audience.</p> <p>On “<i>Proposed addition: Providers should ensure that broadcast information about national and local emergencies is subtitled, signed and spoken</i>”, we would note that we do not currently have a permanent capability to provide live BSL translation, especially at short notice. We believe this could be made slightly more flexible – “should ensure that broadcast information....is made accessible to all audiences”.</p> <p>On “<i>Proposed addition: Teams involved in making accessible programming, including audio describers and signers, should reflect the diversity of their audiences</i>”, we don’t agree with this addition, as it does not appear to be directly linked to the accessible outcomes. ITV is absolutely committed to equity, diversity and inclusion in all of our activities, especially in recruitment of colleagues and in our editorial practices, but this is not directly linked to our provision of and best practice around accessibility and access services.</p>
<p>Question 4: Do you have any views on how developments in technology may inform the production of access services in the coming years?</p>	<p><i>Is this response confidential?</i> – N</p> <p>It is clear that Artificial Intelligence will play an increasing role in the creation of access services, and the modification of access services assets for subsequent re-presentation. ITV sees this as a positive opportunity which could result in greater efficiency and higher quality. However, the technology must be of suitable accuracy and reliability, and there is likely to be a role for human quality control for the foreseeable future. In particular, AI would need to get demonstrably better before it will be an adequate substitute for some types of content (e.g lively debates, football half-time analyses) where the expertise</p>

	<p>of a human will be needed to assist in the disambiguation of the original content. Machines tend to be too literal to assist in these cases.</p> <p>The creation processes for audio description and sign language translation are considerably more complex than subtitling. Avatars will progress for the presentation of BSL - but aspects such as finger spelling and the accurate presentation of mood / tone are still challenging for any technology solution.</p>
<p>Question 5: What do you think about the proposed list of external sources/ guidelines in Annex 3? Are there any additional sources which Ofcom should refer to?</p>	<p><i>Is this response confidential? – N</i></p> <p>The list provides useful supplementary sources of information to help guide best practice. We do not have any additional sources to propose.</p>
<p>Question 6: Do you have any comments on the following suggested changes relating to subtitling? Please provide any additional evidence that you think we should take into account.</p> <ul style="list-style-type: none"> • Subtitling speeds • Live programming • Subtitling presentation • Sound and music descriptions • Language of subtitling 	<p><i>Is this response confidential? – N</i></p> <p>In terms of customisation, we agree that this should be offered where the underlying platforms and middleware support it, but, if it were to be mandated in future, a minimum requirement would need to be defined and platforms / middleware providers would need to be directed to support it.</p>
<p>Question 7: Do you have any comments about the other proposed changes to the subtitling guidelines, as summarised in Table 1 (Annex 1)?</p>	<p><i>Is this response confidential? – N</i></p> <p>One suggested amendment for clarity – where you say “<i>block subtitles should also be used in live subtitling where possible</i>”, we think this should either read “<i>prepared block subtitles</i>”, or add “<i>where this does not increase subtitle latency</i>”.</p>
<p>Question 8: Is there anything additional that you think should be added to the revised guidelines on subtitling?</p>	<p><i>Is this response confidential? – N</i></p> <p>No.</p>

<p>Question 9: Do you have any comments on the following suggested changes relating to audio description? Please provide any additional evidence that you think we should take into account.</p> <ul style="list-style-type: none"> • Approaches to/ styles of audio description • Describing visual features • Describing information about diversity characteristics • Additional audio accessibility features 	<p><i>Is this response confidential? – N</i> No.</p>
<p>Question 10: Do you have any comments about the other proposed changes to the audio description guidelines, as summarised in Table 2 (Annex 1)?</p>	<p><i>Is this response confidential? – N</i> No.</p>
<p>Question 11: Is there anything additional that you think should be added to the revised guidelines on audio description?</p>	<p><i>Is this response confidential? – N</i> No.</p>
<p>Question 12: Do you have any comments on the following suggested changes relating to signing?</p> <ul style="list-style-type: none"> • Meeting the signing requirements • Selection/ scheduling of signed programmes • Use and preferences for different types of signed programmes among d/Deaf children • Ensuring the quality of sign-interpretation • Size of sign interpreter image 	<p><i>Is this response confidential? – N</i></p> <p><i>On Proposed change: Providers should schedule relevant programming for when sign-language users are likely to be watching, avoiding the early hours of the morning as far as possible, ITV prioritises its investment in access services where it is likely to benefit audiences the most. In recent years we have seen a significant increase in BSL audiences accessing content on demand and a concurrent decrease in viewing figures for content broadcast live - although this has been low for a considerable time. As a result, we have focused our efforts on providing a great viewing experience for BSL audiences on-demand on ITVX. This includes making more BSL content available for longer and we have also launched a dedicated BSL FAST channel. As a result, the scheduling of content on ITV's broadcast channels is not as crucial as it would have been in the past. Broadcast airtime, unlike VOD capacity, is limited and ITV must make scheduling decisions that take into account the needs of <i>all</i> audiences. We are therefore likely to continue the</i></p>

	<p>practice of scheduling some BSL content overnight and prioritising other parts of the schedule to more mainstream content, while ensuring BSL audiences have access to the wealth of VOD content on ITVX. We look forward to working with the Working Group and industry stakeholders more broadly to facilitate the take-up of on-demand services by audiences.</p>
<p>Question 13: Do you have any comments about the other proposed changes to the signing guidelines, as summarised in Table 3 (Annex 1)?</p>	<p><i>Is this response confidential? – N</i> No.</p>
<p>Question 14: Is there anything additional that you think should be added to the revised guidelines on signing?</p>	<p><i>Is this response confidential? – N</i> No.</p>

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