

Your response

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| <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 fact that Ofcom is proposing some much needed changes to the Access Services Code and best practice guidelines in relation to TV and on-demand services. This is a fast-moving industry and viewing trends are changing, therefore the guidelines need to keep up and stay relevant to make sure that content is accessible for all.</p> <p>As digital services continue to grow in popularity and usage, it is important that providers adapt to ensure that the provision of access services on digital content matches that on linear services. It is good to see that the Code now takes on-demand services into consideration as well as linear services.</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>Whilst we welcome the idea of making content as accessible as possible to as wide an audience as possible, we feel that the cost implications of introducing new areas of technology and new additional services should be considered.</p> <p>The cost of producing access services is possibly reducing for some broadcasters. Technology is able to take over more and more of the work of creating same-language subtitles in majority languages, however we are yet to see such savings being possible for S4C as such technology is incompatible with minority languages.</p> <p>We do however welcome the proposal to expand the best practice guidelines to include all video-on-demand providers.</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.

- Understanding audiences
- Developing strategies
- Programme selection and scheduling
- National emergencies and important on-screen information
- Promoting awareness
- Accessibility and diversity in production
- Training
- Monitoring of quality

Is this response confidential? – N

S4C have always taken the approach that access services can be beneficial to more sections of the audience than just people with sight and / or hearing loss, therefore we welcome the section on understanding audiences. We have always been aware as well that a proportion of our audience are Welsh learners. In addition, recently we have been increasing the amount of Welsh subtitles available on children’s services in order to support the TOTS campaign (turnonthesubtitles.org).

We agree that the amount of accessible programming should be increased, especially with more and more viewers using access services, however this of course has cost implications.

We agree that ‘moments of national importance’ should be accessible for all, however there needs to be more clarity around this. Some such ‘moments’ which are important to the audience of one broadcaster might not hold such importance with the audience of another.

Question 4: Do you have any views on how developments in technology may inform the production of access services in the coming years?

Is this response confidential? – N

Although there have been significant developments with ASR and AI over recent years, there are significant delays in getting AI to work with the Welsh language. As all of S4C’s programmes are in Welsh, we are currently a long way off from being able to take advantage of such technological advancements.

Looking at the production of access services in general, ASR and AI are certainly a significant advantage when it comes to subtitling programmes but we feel that there should always be human intervention when they are used to create access services.

Question 5: What do you think about the proposed list of external sources/ guidelines

Is this response confidential? – N

The list of external sources and guidelines in Annex 3 is extensive and informative.

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| <p>in Annex 3? Are there any additional sources which Ofcom should refer to?</p> | <p>S4C also have our own specific subtitling guidelines which specifically concentrate on creating Welsh and English subtitles for Welsh content.</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>✂</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>We agree with the vast majority of the proposed changes.</p> <p>We would question the need to remove the guidance under ‘Publicity’ which notes that the word ‘Subtitles’ should be displayed on screen at the start of a programme. We believe that the audience finds this helpful and we will continue to show this graphic at the start of every subtitled programme.</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></p> <p>We agree that different styles of AD should be encouraged. In the past, S4C have stuck to an ‘impersonal style’ of audio describing but would be curious to try out other styles, especially as we have recently been including more children and young adults programmes in our AD schedules.</p> |

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| | <p>We also agree that describing visual features would be beneficial to AD users, diversity characteristics included, and would welcome more guidance around this.</p> <p>Audio introductions can certainly help with this and we have already had some very early talks about introducing such videos to coincide with future dramas, following ITV's Trigger Point character introductions.</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></p> <p>S4C has always believed that AD should offer an equivalent experience of the programme therefore we welcome this addition. The AD should always be informative but it's important to keep in mind that following a programme should be a pleasurable experience for the user, and should not feel like hard work.</p> <p>We agree that the guidance on use of language should be removed – this give the script writers more flexibility in terms of adapting the style of AD to match the programme genre.</p> <p>We should not assume that technical filming terms are beyond the understanding of the users, and that they will be put off by language describing sensitive subjects such as violence or sexual content - the language should be appropriate for the intended audience.</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></p> <p>No</p> |

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| <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>Whilst S4C have been allowed to include a children’s series with Makaton to meet quotas in the past, there has not been such a series commissioned in years therefore we now only include BSL signed programmes in our figures.</p> <p>We are happy to respect the views of disability groups who do not believe that broadcasters should be able to use Makaton or SSE for meeting quotas.</p> <p>Whilst agreeing that it’s important that news and current affairs programmes are signed, this is particularly challenging for S4C as all our signers rely on the English subtitles – signers who can sign from Welsh to BSL are incredibly rare.</p> <p>We strongly agree that providers should schedule relevant programming for when sign-language users are likely to be watching. As well as being available to watch on Clic, S4C’s on-demand service, S4C signed programmes are broadcast every lunchtime Monday to Friday and on Saturday afternoons. We will also be signing a post-9 series over the next few month so will trial a later slot.</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></p> <p>We are happy to see that there is a proposed change included to add a reference to regional dialects of BSL. We have always strived to use Welsh regional dialects within our signing service.</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></p> <p>No</p> |

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