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egta Snapshot

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A PRACTICAL GUIDE TO ACCESS SERVICES IN TV ADVERTISING

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INTRODUCTION

The question of media accessibility has become an important one in recent years, especially within the context of the growing recognition for the need for greater diversity and inclusion in the media industry. When it comes to TV, many broadcasters have already led the way in widening access to TV content for the deaf and hard of hearing and blind and visually impaired through access services like subtitles (ST), closed captions (CC), sign language (SL) and audio description (AD).

TV advertising, however, has so far lagged behind. Today, less than 10% of ads are accessible. With the exception of some awareness-raising campaigns and one-off initiatives, the vast majority of TV commercials tend to be delivered without any access services in place.

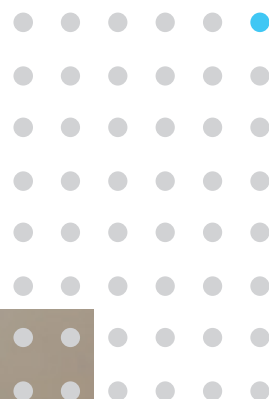
However, advertisers are beginning to make accessibility and inclusion key principles of their advertising campaigns and are committing to widening access to campaign messaging through the provision of access services - a P&G-initiated industry move that has been welcomed already by several large global advertisers. With [386 million of the world's working-age people living with some sort of disability](#), and potentially relying on certain access services to consume media, advertisers are beginning to realise that current practices are excluding significant portions of the population from their campaign messaging.

“The advertising and media industry have the power and the obligation to let all people access content, including the advertising that shapes their choices – it is time we join forces for growth and for good.”



--- **Taide Guajardo**
Chief Brand Officer Europe,
P&G

With the demand from advertisers set to increase and possible legal requirements due to come into force in the near future, the conversation around accessible advertising is only set to pick up pace. The question of accessibility must, therefore, also become a priority for egta, its members and the wider TV industry.



egta's role

As a trade body, egta aims to raise awareness amongst its members around advertisers' new accessibility objectives and to make sure that members are ready to take on the associated challenges. egta aims to facilitate the exchange of knowledge and best practices around the implementation of access services on TV by sharing insights from those who have made significant progress in this area already. The goal is to create a reference point to inspire and guide TV companies as they establish access services for their own TV advertising inventory.

egta launched a survey in March 2022 and conducted interviews with those members who are already able to deliver access services. The aim was to better understand the steps taken and challenges faced when deciding to put these features in place, not just for TV content and programming but for TV advertising too. This report brings together the findings from the survey and interviews and aims to serve as a guide for TV companies wishing to develop their own access services.



The TF1 Group has long promoted and worked towards greater access to its content for all audiences. Thanks to the knowledge and the capacity we acquired from broadcasting content with audio description, we were able to provide audio description on advertising too. Accessibility is a priority for TF1 Pub and we aim to continue working with industry partners to ensure greater accessibility on TV advertising. As President of egta, I would like to encourage all partners in the industry, and in particular all TV colleagues, to embark on this journey. Everyone wins if our content and commercial messages are made accessible to all.



--- **Laurent Bliaut**

President, **egta**

Deputy Director General, **TF1 Pub**

PART 01:

WHAT ARE ACCESS SERVICES ON TV?

TV access services (also known as accessibility features) are additional facilities supplied by broadcasters that are designed to allow hearing and visually impaired consumers, amongst others, to gain access to TV content.

Access services for the deaf and hard of hearing:

SL = Sign Language

Sign language involves an on-screen person or avatar that translates the spoken language into a non-verbal language using visual gestures and signs. Sign language is included for the benefit of deaf and hard of hearing individuals and is oftentimes preferable or more accessible than text-based translations such as subtitles.

ST = Subtitles / CC = Closed Captions

Subtitles are text captions displayed at the bottom of the screen that transcribe the on-screen dialogue. They can be used to widen access to deaf and hard of hearing individuals but are often also enjoyed by many other users to facilitate comprehension.

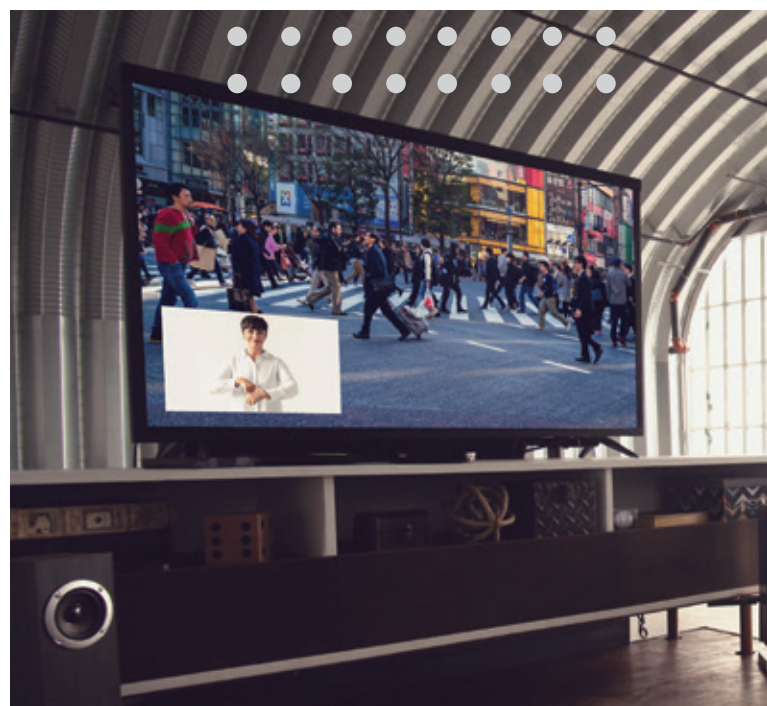
Subtitles are sometimes referred to as closed captions. Often closed captions not only transcribe the dialogue but they can also provide additional information about the soundtrack and other audio elements (such as tone of voice, music or background noises, e.g. **the radio turns off as the phone rings** or **the door slams shut**). They are often included for the benefit of deaf and hard of hearing individuals to give additional information beyond dialogue alone. Descriptive closed-captions may also be helpful to people with learning disabilities.

Access services for the blind and visually-impaired:

AD = Audio Description

Audio description (also known as described video or video description) is a form of voice-over narration, played in parallel to the video's primary audio track, to provide additional information about key visual elements of the on-screen action, e.g. *"Inside the dark house, the man walks down the corridor with a flashlight"*. Audio description is included for the benefit of blind and visually impaired individuals.

For more information on audio description and how it is used, please see the [overview video from the RNIB](#) (Royal National Institute of Blind People, UK).

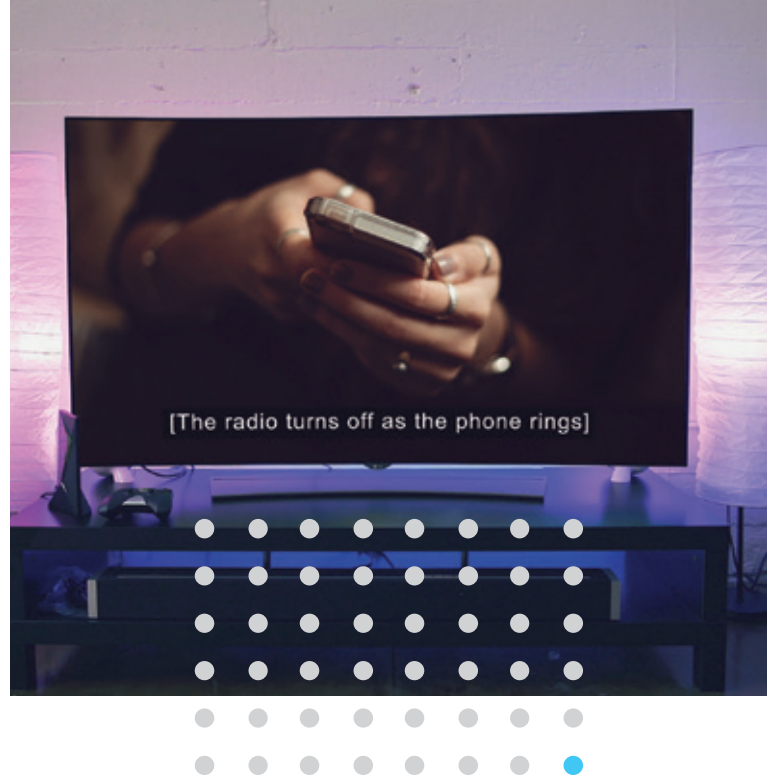


PART 02:

WHY ACCESSIBLE ADVERTISING?

TV is not only a mass-reach medium with broad appeal, it is a well-loved and trusted medium that reflects our societies and brings people together. It should, therefore, simply make sense for broadcasters to ensure that TV is as accessible as possible to the widest amount of people possible, including those that have traditionally been excluded, such as the deaf and hard of hearing, blind and visually impaired, or those with other disability or learning impairments. The question of media accessibility ultimately comes down to making sure that TV is for everyone. Before taking a closer look at how we can remove barriers to TV content through the use of access services, here are just five reasons why TV companies need to prioritise media accessibility:

1. Greater accessibility means greater potential campaign reach – by widening access to campaign messaging, advertisers are able to include even more people in their audiences. Huge proportions of the population depend on access services to enjoy audio-visual media. The European Blind Union estimates that [there are around 30 million blind and partially-sighted people living in geographical Europe](#), with an average of 1 in 30 Europeans experiencing some form of sight loss. According to the World Health Organisation, almost 200 million people in the European region experience some degree of hearing loss, with [just under 50 million adults living with disabling hearing loss](#). These people are currently being excluded from a significant amount of TV advertising content.
2. Access services are enjoyed by many different users (not just the deaf and hard of hearing or blind and visually impaired), for example, those with dyslexia or other learning impairments or by foreign-language speakers. Ofcom in the UK found that [18% of the UK population \(7.5 million people\) use closed captions \(CC\) while only 1.5 million of those people are deaf or hard of hearing](#).



80% of television viewers, therefore, are using closed captions for reasons other than a hearing disability. TV content is now available anywhere, anytime and on any device, for example, on mobiles or tablets. These changes in viewing behaviour mean that more users are choosing to enable subtitles or closed captions on their TV content, on the way to work, on the bus or metro, often in crowded and noisy environments. Users' expectations have also evolved in part due to the rise in on-demand streaming platforms, most of which offer subtitles and other access services as standard. Interestingly, [young people today are almost four times more likely than older viewers to watch TV shows with subtitles](#), despite having fewer hearing problems.

3. Advertisers are increasingly opting for access services for their campaigns. Global FMCG giants, such as P&G and Unilever, have recently reached out to egta to discuss the issue of accessible advertising for the visually impaired and hard of hearing. It has become an absolute priority for P&G, for example, who aim to make 100% of their TV advertising messaging accessible by 2025, through the use of audio description and closed-captioning. Many other advertisers are beginning to make increased commitments to greater diversity and inclusion –

accessibility must, therefore, be a key consideration.

4. Ensuring greater media accessibility may soon become a requirement in many markets. While legal obligations for access services on advertising are virtually non-existent, this may change in the near future as European countries [introduce the EU's 2018 Audiovisual Media Services \(AVMS\) Directive](#). At the time of writing, 22 out of 27 European markets have already transposed the Directive¹, which includes aims to ensure wider accessibility on all audio-visual media services, including commercial communications. This may well include video advertising depending on how the Directive is implemented in each European Member State.
5. Making TV advertising more accessible is easier than one may think. Based on the research egta conducted, the infrastructure required to deliver access services on TV advertising, in most cases, already exists and is currently in place for TV programming. From a TV sales house perspective, very little investment is required, therefore, to enable these access services during the commercial breaks. egta members that are already delivering more accessible advertising indicate that while the implementation of audio description is not without its challenges, subtitles and closed captions remain on the whole relatively easy to achieve.



I am totally blind but watching programmes either on TV or online is something I've always enjoyed doing. However, I find myself confronted with the reality that visual content is prioritised to pass on information. In most cases, you have videos made with music, sound and voiceover all supported by images and fast-moving visual content but, because I can't see, most of that visual content just doesn't make much sense to me. At best, I could understand the overall theme if there were voiceovers, but that would be about it.

In a TV ad, for example, while I could understand whether it was presenting a product or a service, I would probably not get the name of that product nor the brand that produces it. It is incredibly frustrating to know that information is given and that the content could be of interest to me, but because of the lack of accessibility I have no idea.

The only way for people with sight impairments to have access to this information and fully understand the video, would be to have it described. That's why audio description is so helpful and so important. By describing the visual content and the action taking place, it gives context to the message that is given – only then will sight impaired people have access to the same information as everyone else."



--- **Thibault Trancart**
Brand Manager, **P&G Europe**

¹ At the time of publication, Czech Republic, Ireland, Romania, Spain and Slovakia are still in the process of transposing the Directive.

PART 03:

TV ACCESS SERVICE OBLIGATIONS

The question of providing access services on TV is not a new one and legal obligations have already been in place for TV broadcasters in many markets for the last decade. Requirements introduced by European and national law, overseen by national regulatory bodies, such as Arcom (Regulatory Authority for Audio-visual and Digital Communication) in France or Ofcom in the UK, oblige TV broadcasters to make a minimum amount of content available with access services in place, such as subtitles (ST) and sign-language (SL) for the deaf and hard of hearing, or audio description (AD) for the blind and visually impaired. In some markets, ST obligations only apply to TV content that is not available in the national language(s).

The highest minimum threshold typically applies to ST, which can be as high as 90-100% of pre-recorded content for some broadcasters. This is likely due to the ease with which they can be produced and their general suitability to a range of content types. While exceptions are sometimes in place for live footage, such as news or sports commentaries, the increased availability of automated speech-to-text technology (also known as [ARC – Automatic Real-time Captioning](#)) has made the provision of ST on live or unscripted content less challenging. Live subtitling is often used to widen access to sport events like the Olympic and Paralympics Games, for example. Some exceptions to ST obligations remain for content such as teleshopping in order to avoid the further overloading of viewers with on-screen text and information.

The minimum requirements for content made available with AD tends to be much lower, at around 10% of content. In some markets, a minimum number of shows must be made available with AD. As an example, in France, this stands at 100 shows per year and must include at least 55 new programmes. The lower threshold for content with AD is in part due to the unique challenges that AD presents. Audio describing certain kinds of content may be either unnecessary, e.g. for interviews or news footage, or unsuitable, e.g. live music or artistic performances.

Similarly, requirements for content with sign language (SL) remain relatively low, at no more than 10% of broadcaster content and tend to apply to specific kinds of content, such as news programming.

Some broadcasters have exceeded the minimum proposed requirements. Channel 4 in the UK, for example, has put inclusion and accessibility at the heart of what they do, supporting ST and AD across all their linear assets and [setting out commitments that exceed those set out by Ofcom](#). In Germany, [ARD broadcasts 40% of primetime shows with AD](#) and, since 2016, produces all new pre-primetime series with AD in place.

While some progress has been made to widen access to TV programming, regulation, until recently, has not extended to TV advertising. This is, however, changing as markets in Europe transpose the Audiovisual Media Services (AVMS) Directive. The EU Directive aims to ensure that accessibility requirements for all audio-visual media services, including commercial communications, are met continuously and progressively. This may mean that accessibility requirements are extended to TV advertising, both in the linear and non-linear space, depending on how individual Member States implement the legal requirements. The Directive is the minimum baseline, so Member States may well introduce higher restrictions – greater divergence from market to market will, therefore, be expected. Complementing the AVMS Directive, EU legislators adopted an Accessibility Act in 2019, which Member States should implement in summer 2022, extending the accessibility requirements to online interfaces, including websites and online apps.

PART 04:

ACCESS SERVICES FOR LINEAR TV ADVERTISING

Today, relatively few TV companies offer access services on their linear TV advertising inventory. Some sales houses, however, have already made significant progress in this space. By 2021, TF1 in France were able to broadcast more than 15% of their TV spots with ST and around 20 campaigns with audio description (AD). Similarly, M6 were able to deliver around 13-14% of TV spots with ST in 2021.

Admittedly, the number of spots aired with ST still makes up just a small fraction of total TV advertising – with even fewer spots aired with AD. Some efforts have been made by sales houses to raise awareness of the importance of access features for advertising, both among users and advertisers, and have launched initiatives to showcase their ability and willingness to widen access to commercial breaks.

As early as 2016, M6 launched an ad-break takeover whereby all the ads in a given commercial break were aired with ST. The subtitling costs were covered by the sales house in an effort to encourage participation from advertisers and highlight the importance of ST availability. Furthermore, French TV trade body, SNPTV, also produced a [best-practice charter to facilitate the subtitling of TV commercials](#) (see [here](#) for an English language translation).

4 Sales, the sales house of Channel 4 in the UK, [ran a similar initiative in 2021](#), in partnership with the RNIB (Royal National Institute of Blind People). An audio-described ad-break takeover was launched during the Paralympic Games to raise awareness of the importance of AD and to demonstrate the possibility of access services in TV advertising. Clients included Airbnb, BT Broadband, Experian, Virgin Media, and P&G brands Gillette and Oral B. The level of enthusiasm and willingness to participate from clients meant that 4 Sales were able to air two full ad breaks with AD.

While the number of spots 4 Sales receives with AD is still less than 2% of total spots, advertisers are increasingly aware of the feasibility of accessible ads. [4 Sales even produced a guide](#), in collaboration with various disability associations, aimed at inspiring clients and informing them about how AD can be included in their campaigns. In France, the ARPP, the French advertising self-regulatory organisation, [published guidelines on audio-describing TV commercials](#) with contributions from SNPTV and French sales houses (see [here](#) for an English language translation of the press release).

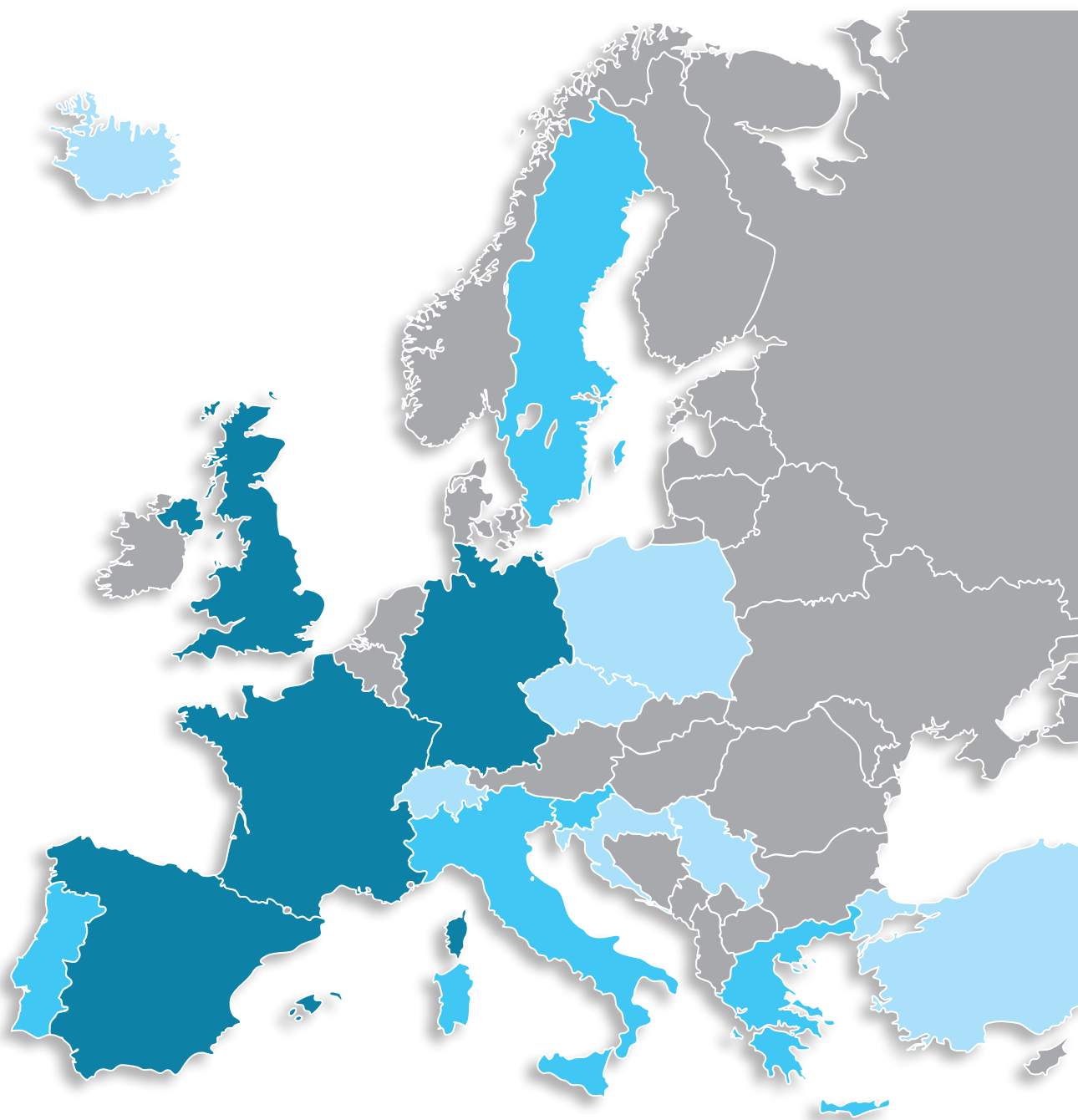


Availability of access services for TV advertising

Based on [egta survey](#) launched in March 2022 (access to full results available for egta members only)

Markets in which egta members report being able to:

- Some access services for programming
- Some access services for programming and advertising
- Full access services for programming and advertising
- No contribution to egta survey





PART 05:

TECHNICAL SOLUTIONS FOR ACCESS SERVICES ON LINEAR TV

In most countries, TV companies have had to adapt to requirements for access services on the programming side of their business and have, therefore, already had to make the investments in the necessary technical solutions on the channel side. In theory, many sales houses, therefore, already have access to the experience, knowhow and technical infrastructure to be able to deliver access services on the advertising side. In practice, however, even if solutions are already in place for content, delivering access services on advertising presents its own set of challenges and obstacles.

In most cases, the financial investment required to make access services available is made by the broadcaster. egta members indicate that there are no, or relatively few, additional costs incurred by the sale house. With the technical infrastructure in place content side, enabling the same access services for ads, through the same technical solutions, is relatively straightforward. The actual implementation does, however, require some intervention from technical teams and a certain degree of fine-tuning, which can take several weeks to finalise, as reported by one member.

When asked about the cost of implementing a technical solution from scratch, in the scenario that a broadcaster does not already have the infrastructure in place, one member estimated the cost to be around 250,000 euros.

Sign language (SL)

Sign language (SL) is made available to widen access to deaf and hard-of-hearing users and is often easier for users to follow than text-based services like subtitles.

TV advertisements with SL require no additional technical intervention from the TV company as usually the additional visual element (e.g. the person or avatar communicating in sign language) is not overlaid on top of the video as a separate video asset, rather it is embedded within the video itself. Airing a spot with SL is, therefore, as simple as airing a non-SL spot providing that the production and provision of the SL version of the spot has been taken care of. This option does, of course, mean the SL services appear on-screen for all users.

Subtitles (ST) and Closed-Captions (CC)

A simple solution for subtitles (ST) is to embed the text directly into the video - this is sometimes referred to as 'open captions' whereby the text is 'burnt' into the video itself. This allows the TV company to broadcast

the subtitled video as easily as they would with any other non-subtitled TV spot, with no need for any additional tracks or files. It does, however, mean that the ST appear for all users and cannot be switched off.

Another option is to overlay the ST on top of the video file. This is not particularly costly or overly complicated but it does depend on the appropriate technical solution being in place from the TV programming side. This method requires an additional text file to be provided in a format agreed-upon with the sales house. The most common format appears to be STL ([EBU Subtitle Data Exchange format](#) - a legacy standard widely adopted in the broadcast industry). The text file is then encoded within the advertising asset in advance so that the ST can be enabled upon broadcast. This may differ from the way ST are activated on the programming side, where the ST track is delivered separately and stitched to the video asset upon broadcast itself. Some human intervention from the sales house is required up stream in order to ensure that the ST:

- are correct and correspond to the right advertisement
- match and are in sync with the dialogue / speech
- are clearly visible / legible and not in conflict with any other visual on-screen elements
- appear and disappear with enough time for viewers to read them comfortably

Audio-Description (AD)

Making advertising available with audio description (AD) is typically achieved by delivering an additional audio track featuring a voice over describing the on-screen action and giving information about key visual elements in the video. There are several ways of implementing AD.

As a basic requirement, broadcasters must have a multi-channel audio system with at least 4 audio tracks. Tracks 1 and 2 are typically used for the standard left and right stereo sound tracks. The AD file with voice over narration is then introduced into track 3, which plays over the top of the video's standard audio. It is important to ensure that the AD audio track is not in competition with the video's standard audio on tracks 1 and 2. In other words, the AD track should not be competing with the primary audio elements in the video. Track 4 is, therefore, used as an 'audio description control' which ensures the various audio elements are well mixed and working in harmony with each other.

It is still possible to deliver AD when only three audio tracks are available. However, the absence of a control track means that audio components may 'talk over' each other, leading to a less than optimal AD experience for users, unless the sales house intervenes manually ahead of time to ensure sound levels are adjusted. Those using this method indicate that investment in a



fourth additional free audio track would be considered if there was a significant need for it, e.g. if there was a greater demand for AD from advertisers and agencies.

The provision of AD perhaps creates the most additional work for sales houses as it may require a manual intervention whereby the additional audio tracks are inserted, verified and activated before a TV spot is broadcast. It is possible to automate this process so that TV spots with AD tracks are automatically activated, however, human checks are still often required upstream in order to ensure that:

- the AD is correct and corresponds to the right advertisement
- the AD accurately describes the on-screen action and visual elements
- the voice over is not in conflict with any other audio elements
- the voice over comes in at the right moment

Manual interventions and additional checks to ensure access services run smoothly are, at present, time consuming but manageable due to the small number of advertisers currently delivering spots with AD tracks. This intervention becomes even more time consuming when subtitles (ST) are added. Concerns have been raised by some sales houses that if the number of spots with such access services increases, current work flows will become unsustainable and other solutions will need to be considered, including greater automation. On the whole, communication to advertisers and agencies around TV companies' capability to offer access services remains rather limited, partly due to the aforementioned concerns about a potential increase in demand and the additional challenges that this could present.

At present, there is typically no on-screen symbol that appears during advertising breaks (unlike for



An innovative AD solution by SevenOne

When looking into the feasibility of providing AD services on their content, SevenOne Media in Germany encountered a technical challenge – there were no free audio tracks available to add an additional voice over file for AD. For SevenOne, out of a total of eight audio tracks, two are used for left and right audio and the remaining six are used to enable surround sound.

A solution was found in Austrian company, [AUDIO2](#), specialists in ST and AD services, who created a [mobile app which allows blind and visually-impaired users to access AD services on TV content through their own mobile device](#). SevenOne worked with AUDIO2 to create an app, available on iOS and Android, that is compatible with SevenOne's own channels and programming. An app of this kind reportedly costs between 40,000 – 50,000 euros and takes approximately 4 weeks to produce, depending on the technical specifications at hand.

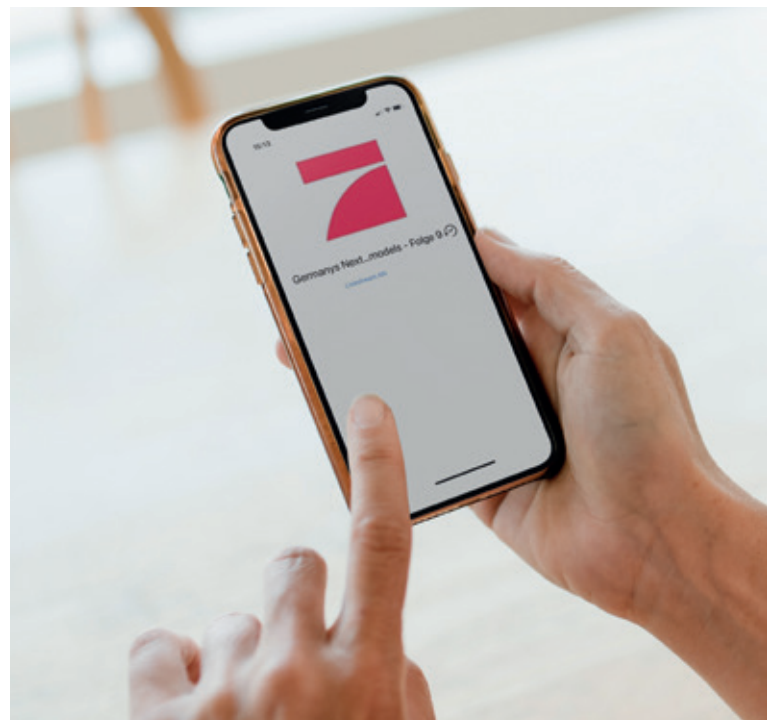
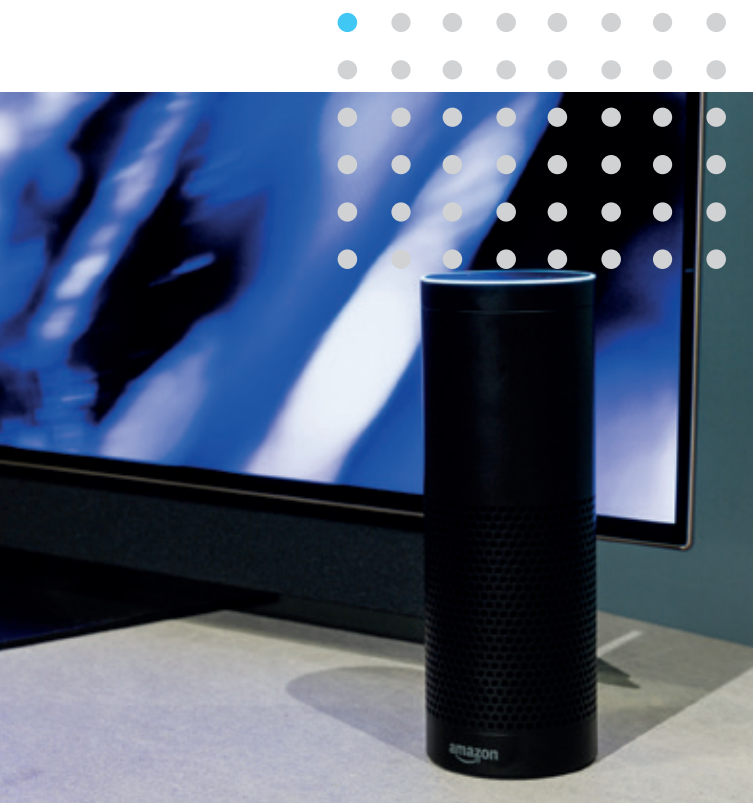
Whenever AD is available, an on-screen logo appears allowing users to activate the service on their mobile device. At present, this innovative AD service is available for over 100 shows, including *Germany's Next Top Model* and *The Masked Singer*, and was recently enabled for the *2022 Academy Awards 'Oscars' Ceremony* and the TV premier of *Star Wars: The Rise of Skywalker*. The AD service is also compatible with Amazon's Alexa – if AD is not available, users can ask Alexa to be automatically reminded when the next show with AD starts.

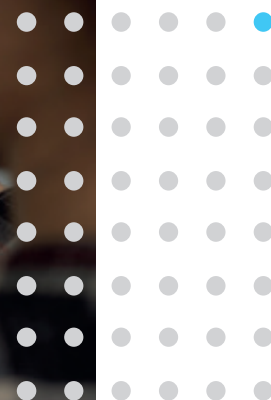
Currently, this tool is used only to enable AD on SevenOne's programming. However, the service is ready to be used for advertising content also, should the demand arise.

programming) to let users know that access services are available. Users wishing to benefit from ST or AD on advertising will need to have these features already activated on their TV, set-top box or device. The activation of some access services relies on the compatibility of the TV, set-top box or device used by users. However, the penetration of compatible devices nowadays is high enough to allow most users to access these services when available and activated.



It is worth noting that HbbTV technology (in markets where HbbTV is enabled) can also be used to deliver access services. The EBU organised an online talk in 2021 – [Leave No One Behind](#) – which looks at the technical aspects of using HbbTV to enable a range of access services on TV.





PART 06:

ACCESS SERVICES ON VOD

While many broadcasters are subject to regulation that requires them to provide access services on linear TV, there is currently little in place that obliges TV companies to have access services in the online video and VOD space. This is, however, an increasingly important priority particularly for those TV companies with a digital-first strategy that want to offer access services across all platforms. Users today also expect subtitle (ST) features when consuming online video, in part due to the rise in on-demand streaming platforms where such features are available as standard.

While adapting the digital video player of a given BVOD service may be relatively straightforward and easily achieved, the challenge lies in the fact that TV companies have many different versions of their BVOD platform depending on the delivery device, e.g. mobile phone or tablet app, smart-TV/ connected-TV, set top box, web browsers etc. Each device uses a different video player, which consequently requires a slightly different technical solution to allow for access services. In the UK, ITV's current BVOD platform, ITV Hub, for example, is available on more than 30 different platforms and device types – ST is available on more than half whereas AD is available on mobile only. ITV's aim, with the launch of ITVX in 2022, is to have ST

available across all screens and devices and to have extended access to AD services.

According to ITV, for ST to work on advertising on their BVOD platform, the ST would need to be embedded into the advertising asset as an [STL file](#) and then extracted and converted into an XML file to ensure compatibility with the video player.

Solutions for enabling ST or AD in the advertising space on VOD or digital platforms are still in their infancy. However, ad tech providers, such as Freewheel, are currently in talks with VOD teams at UK TV companies to discuss the feasibility of enabling access services in the advertising space on BVOD platforms.

Solutions will likely emerge from a global or international tech player, rather than any individual TV company and any solution that materialises for a BVOD player in one market is likely to be replicated internationally and used by publishers in several markets.

PART 07:

PRODUCING ACCESSIBLE ADVERTISING

Demand for access services from advertisers and agencies remains, on the whole, rather low. This appears to be changing, however, with global advertisers, such as P&G and Unilever amongst others, making increased commitments to inclusion and accessibility, and some advertisers creating ad campaigns with disabled people in mind. Take, for example, Mastercard's Spotlight TV ad for their 'Touch Card' product, aimed at the blind and partially sighted – a wonderfully creative ad that quite literally shines the spotlight on AD.

For those advertisers and agencies wishing to run accessible TV advertisements, there are, of course, additional costs involved in producing the materials for the desired access services, e.g. the transcription and adaptation of the dialogue for subtitles (ST) or the production of a voice-over audio track for audio description (AD). These costs are always carried by the advertiser or agency and not by the TV company or sales house. As the access services that accompany a given advertising campaign need to be uniform across all publishers, the material is rarely produced by an individual sales house (even if TV companies are sometimes able to produce access services in-house for their own programming). Rather, the production of materials is handled by specialist third-party providers at the request of the creative agency or advertiser. Examples of providers are listed on the next page.

The World Federation of Advertisers (WFA) is exploring the development of resources and best practice so that, once broadcasters are equipped, accessible advertising can be produced accordingly.

Sales houses capable of running accessible TV advertising require all advertising assets to be provided with all of the materials for the desired access services (ST text files, AD audio files) already prepared, approved by the relevant authorities (if applicable – for example by Clearcast in the UK) and ready to broadcast. Sales houses do not currently charge any additional fees for

“It's the responsibility of marketers and media to leverage the power of their networks to promote inclusivity at scale... By innovating with access and ease in mind, we strive to provide equal opportunity for all to benefit in our digital world.”



--- **Raja Rajamannar**
Chief Marketing &
Communications Officer,
Mastercard

“Advertising must not only represent but also reach all consumers – including the one billion people worldwide who have disabilities. It's not only the right thing to do - there is a clear business case too. The economics of inclusion is indisputable. The spending power of people with disabilities is estimated to be \$8 trillion USD. It's therefore paramount that all media channels enable access services for advertising content.”



--- **Conny Braams**
Chief Digital and Commercial
Officer, **Unilever**

broadcasting advertising assets with access features in place, despite the associated verification and manual interventions required to make sure the accessible spots air smoothly (see section 5).

The production of access services needs to be a key consideration as early as possible during the creation of a campaign's creative in order to limit potential challenges downstream. This is especially true for global advertising campaigns where the specific and unique accessibility needs of each market (e.g. literacy rates) need to be taken into account. In many cases, accessibility is only considered in the very final stages of the workflow, often as an afterthought or last-minute addition. The challenge, therefore, for providers of materials is to assess how feasible it is to create access service for the given creative assets. A campaign with a lot of on-screen text and no dialogue would not allow for ST, for example. Whereas, producing effective AD can be particularly challenging in an advertisement with lots of dialogue and action, as there needs to be sufficient space within the audio to allow for a voice over narration to provide the required additional information. The production of access services, therefore, must be considered from the beginning as an integral part of the creative process. This is especially true for AD, which requires much more than a simple narration of the action. Effective AD must also incorporate and convey elements of the visual assets, such as atmosphere, humour and emotion and often require skilled voice actors.

An additional challenge when producing AD is the mandatory superimposed texts (also known as 'supers'). Certain types of advertisements, for financial products, alcohol brands or cars, for example, are obliged to carry certain additional on-screen messages (e.g. small print or terms and conditions), which advertisers are obliged to include in any AD adaptation. These special mentions must be read out aloud so that blind or visually-impaired users are also made aware of them. This can eat into a significant amount of the already-limited airtime available for AD voice over and may overload users with additional information.



Examples of access service providers:

- [Zoo Digital](#) - International
- [Eclair](#) (Versioning & Accessibility) - International
- [AUDIO2](#) - Austria
- [Nice Fellow](#) - Belgium
- [ST-501](#) - France
- [ILUNION Accesibilidad](#) - Spain
- [Red BEE](#) - UK
- [Ad Text](#) - UK

These companies typically offer a range of access services for audio-visual content and aim to help advertisers and agencies create socially-inclusive advertising, fulfil diversity and inclusion commitments, and expand the reach of their campaigns.

Taking the UK as an example market, a typical package for the production of subtitles for a standard 30-second TV spot can range anywhere from 200 - 700 euros, depending on the complexity of the work required.

Most clients opt for packages that includes both audio description and subtitles or closed captions, which can be as much as 1000 euro for a 30-second spot, depending on the nature of the project.



The role of Clearcast in the UK

Clearcast is the UK clearance body in position to ensure that advertising isn't misleading, harmful or offensive and that it conforms to the UK Codes of Advertising. Clearcast is owned by UK commercial broadcasters, ITV, Channel 4, Sky and Warner Media.

Advertisers in the UK, face additional requirements when considering audio description (AD). The AD voice over is, in fact, recognised as an integral part of the advertising campaign and is, therefore, subject to approval from Clearcast to ensure assets conform to advertising standards. After submitting a draft version (or 'rough-cut') to Clearcast, if no amendments are required, advertisers can submit a final version (or 'clocked version') of their ad with AD for approval. Each step can take up to 3 days. An advertiser may submit the final 'clocked' version with AD directly to Clearcast, however, they run the risk of having to go back to make amendments to the final version.

Subtitles (ST), however, are not subject to approval from Clearcast. Yet, advertisers or agencies will still often delay the production of ST for their campaign until Clearcast approval for the ad is achieved, to avoid needing to re-adapt the ST if the ad is not cleared and amendments are required. The production of ST

is, therefore, often done at the last minute to avoid additional costs. The time and financial constraints partly explain the low uptake of ST and AD.

Clearcast are set to launch a solution in the second half of 2022 with the aim to centralise ST production, gaining an overview of the number of subtitled ads delivered in the UK and closing the gap between the approval and the delivery of subtitled ads. Clearcast will not only approve the ads, but will be able to offer an optional delivery service too, effectively streamlining the process and eliminating any potential errors between approval and airing. As a part of the solution, Clearcast will offer an integrated ST service to those who also chose them to do their delivery. If an ad for which ST are requested is not approved, any required amendments to the ST will be done at no additional cost to the advertiser or agency. Users will be able to choose from a number of different ST providers and price options, including Clearcast's own in-house subtitling service.



The WFA is committed to advance Diversity, Equality and Inclusion across our industry and across society more broadly. That's why we welcome this initiative by EGTA to highlight best practice in making advertising as accessible as possible. It is our responsibility as an industry to ensure our content is representative of everyone in society, but we also need to make it accessible to everyone, irrespective of their different abilities. Nobody should be left out."



--- **Stephan Loerke**
CEO, **WFA (World Federation of Advertisers)**



IDENTIFYING NEXT STEPS

This report aims to inspire and guide TV companies as they move towards greater media accessibility. Listed below are questions that TV companies can ask in order to determine what the next steps are on the journey towards making TV advertising more inclusive and accessible to everyone.

Understand the need for greater advertising accessibility

- Should TV content be made accessible to as many people as possible? If so, why do we currently allow large numbers of people to be excluded from both the content and the advertising on my company's channels?
- If accessibility is a growing priority for both consumers and advertisers alike, is my company currently doing enough on this issue?

Identify legal obligations in my market

- Are there any current or future regulations (through the AVMS Directive or other) due to come into effect in my market that may make access services for TV advertising a requirement?

Assess technical capacity

- What access services are available for programming and how are they delivered? Could the same technical solutions also be used to deliver access services for advertising?
- Is my TV company able to offer subtitles (ST) or closed captions (CC) on advertising? If so, how can we ensure that subtitling practices for TV ads are harmonised?
- What technical solutions are possible for audio description (AD)? Can the process of activating AD be streamlined or automated if demand rises?
- Are other solutions possible for AD, such as HbbTV or the use of a mobile app or smart speaker?
- How are users with visual or hearing impairments made aware of the availability of access services and how easy is it to activate them?

Consider opportunities in the non-linear space

- What technical solutions are possible for delivering access services for online video and video on demand (VOD)? Is it possible to deliver access services across all screens and devices?
- To what extent does accessibility play a part in my TV company's VOD and digital strategies?



Communicate with advertisers and agencies

- Could offering greater accessibility to content and advertising set the medium of TV apart as a force for good?
- How can my TV company make advertisers and agencies more aware of the availability and advantages of access services for TV advertising?
- How can my TV company make it easier for clients to run accessible campaigns on our channels and platforms?

Prepare for the future

- How prepared is my TV company to face the growing demand for media accessibility, whether due to legal obligations, user expectations or demand from clients?
- How does accessibility play a part in my company's wider strategy for transformation and diversification?

CONCLUSION

While there are many compelling reasons as to why widening access to TV content and advertising makes good business sense, the most convincing reason is that it is simply the right thing to do - ensuring that TV is accessible and enjoyed by everybody. TV has long been a medium that both reflects and shapes society and has a huge potential as a force for good and for positive change.

With this in mind, TV companies have not only a responsibility but also a unique opportunity to create a society in which more people are able to enjoy everything TV has to offer. If the TV industry wishes to remain in tune with the important questions of today, TV companies must continue to face up to the growing calls for greater diversity, inclusion and accessibility from consumers, clients and wider society.

Significant progress has already been made to widen access to TV programming – the focus must now be on advertising. While access services for the deaf and hard of hearing – subtitles (ST) or closed captions (CC) – on linear TV advertising are already technically possible for many TV companies, providing access services for the blind and visually impaired – audio description (AD) – presents more significant challenges. Yet, as AD has the best potential to reach more people, it may be a good place to start when defining innovation strategies. We are already beginning to see technical capacity and innovative solutions being developed in this area, however, there is still progress to be made.

There are also other challenges worth considering, such as delivering access services for video on demand (VOD) and online video, and ensuring that accessibility is incorporated into digital strategies, especially as TV continues to become a medium that is consumed anywhere, at any time and on any device.

As a trade association, egta aims to play a part in facilitating this positive change by opening the conversation with all stakeholders and assisting egta members as they navigate these new challenges and opportunities.

“TV has the power to shape society for the better. TV broadcasters have a unique opportunity to include those audiences that have traditionally been excluded. By widening access to not only content but advertising too, we can make sure that TV continues to be a medium that is truly for everybody. As a trade body, egta will play its part in facilitating this positive change by supporting TV companies as they embark on this journey towards a more inclusive and more accessible media industry.”



--- **Katty Roberfroid**
Director General, **egta**



ABOUT EGTA

egta is the global trade body for marketers of advertising solutions across multiple screens and audio platforms. The association aims to help its members transform, grow and diversify their business, i.e. the monetisation of TV and radio content across their linear and online portfolios.

Currently, egta network counts 160+ members in 40+ markets in Europe and beyond.

Together, egta's TV members represent 75%+ of the European television advertising market, whilst egta radio members collect 50% of radio advertising revenues in countries where they are active.

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