

**RN  
I.D**

Supporting people  
who are deaf, have  
hearing loss or tinnitus

**SUBTITLE IT!**

# RNID SUBTITLE IT REPORT



# INTRODUCTION

**Without access to services such as subtitles and signing, TV is unwatchable for deaf people and people with hearing loss.**

In April 2023, RNID ran a survey to find out more about people's experiences accessing subtitles and British Sign Language interpretation and audience preferences for these features.

This report outlines the findings from that survey. It shows that people continue to face significant barriers accessing TV through on-demand platforms due to a lack of subtitles and signing. It also sets out what on-demand service providers, platforms and the Government need to do to improve access.



# METHODOLOGY

Breakdown of respondent's answers to the question: which of these statements apply to you? Please tick all that apply.

Answer choices	Number of participants
I'm deaf	471
I have hearing loss	975
I'm deafblind	10
I have tinnitus	552
None of the above	166
Prefer not to say	12
Prefer another term	42



We carried out an online survey between the 22nd March and April 24th 2023, asking our communities to share their experiences of using subtitles and BSL interpretation to watch TV.

**1616** people participated in the survey, **1370** of which identified as having hearing loss, or being deaf or deafblind. This figure includes **129** respondents who were deaf BSL users.

# BACKGROUND OF SUBTITLE IT! CAMPAIGN



RNID has been campaigning since June 2015 for the Government to introduce legally binding quotas for access services for on-demand TV. In 2017, the Government passed the Digital Economy Act, which included a clause to give the TV regulator, Ofcom, the power to set quotas for on-demand services.

Since 2017, Ofcom has run two consultations on what the quotas should be and how they should be implemented. However, the Government has been slow to bring the necessary secondary legislation forward to enforce the quotas.

In April 2023, the Government published a Draft Media Bill which laid out that they would be adopting the recommendations made by Ofcom following their consultations.

**RNID are calling on the Government to introduce the Media Bill to Parliament as soon as possible to ensure that there are no more significant delays to the legislation.**

This included binding targets of **80%** for subtitles, **10%** for audio description and **5%** signing for 'Tier 1' services, 4 years after the necessary legislation is passed.

## What is an 'on-demand programme service' (ODPS)?

An on-demand programme service refers to a library of programmes that are watchable anytime, instead of being shown as scheduled live TV. Services can often be accessed through a variety of platforms including websites, apps, or smart TV services.

## What is a Tier 1 Service?

The Draft Media Bill introduces the concept of 'Tier 1' services, which would apply to the major on-demand services and will be defined further in secondary legislation.

# ACCESS TO SUBTITLES

Over **75%** of respondents told us that they usually or always use subtitles, a figure which rose to **90%** for those with hearing loss and people who are deaf, when watching either live programmes or on-demand TV.

Despite the clear need for subtitles to be available for people with hearing loss and who are deaf, access to this service is not guaranteed.

Our survey found that **97%** of respondents had tried to watch a programme in the last year and found there were no subtitles.

This is despite the threat of legislation since the Digital Economy Act in 2017. In 2015, our Progress on Pause survey found that **87%** of respondents with hearing loss had started to watch a programme on-demand and found it had no subtitles.

**85%** of people with hearing loss and who were deaf told us that the lack of subtitles stopped them from watching the programme. Speech and sound are an important part of video content and without subtitles, people with hearing loss or are who are deaf do not have equal access to television and on-demand programme services.

**9/10**  
of respondents with hearing loss and who were deaf usually or always use subtitles when watching TV.

**97%**  
of respondents told us they tried to watch a programme and found there were no subtitles.

**85%**  
of people with hearing loss and who were deaf told us that the lack of subtitles stopped them from watching the programme



This had particularly negative effects on deaf respondents and respondents with hearing loss, including:





**29%** of people being excluded from watching a programme with their family.

**17%** missing out on a conversation at work or with friends because they had missed an episode.

**20%** said that they avoid watching programmes on that on-demand service anymore because of the bad experience.

**Broadcasters and on-demand programme service providers should prioritise making their programmes available with subtitles whenever and wherever audiences can find them.**

The emotions that people with hearing loss felt when they couldn't access shows included:

-  **frustration (79%)**
-  **disappointment (68%)**
-  **excluded (59%)**
-  **angry (30%)**



## ACCESS TO BROADCAST VIDEO ON-DEMAND SERVICES (BVoD) VARIES SIGNIFICANTLY DEPENDING ON THE PLATFORM YOU ARE WATCHING IT THROUGH.

Broadcast video on-demand (BVoD) services are services offered by traditional TV broadcasters which provide access to their on-demand content. You don't need a subscription to watch content, unlike services such as Netflix, which would be considered a subscription video-on-demand (SVoD) service.

Our survey found that audiences had found that content on all the major BVoD services, including BBC iPlayer, ITVX and All4, had programmes on their platforms without subtitles.

40% of respondents told us that they had tried to watch a programme on BBC iPlayer and found there were no subtitles available. This was only marginally higher than ITVX and All4 (38% each) but there does seem to be a connection between the prominence

of the service and the rate of respondents reporting they have faced problems accessing content. Ampere Analysis found that BBC iPlayer, ITV Hub and All 4 were within the top 5 for most-used online services for watching videos each month.

The Ofcom Access Services Report also shows how the provision of subtitles on BVoD services can vary widely depending on which platform audiences access it through. For example, in 2021 Channel 4's provision of subtitles varied from 99% on Britbox to 0% on Sky Go. Where BVoD services have control of the platform, the provision of access services is better, but third-party platforms perform much worse.

**All of the major BVoD services had programmes on their platforms without subtitles.**

**BVoD services must do more to push for platforms to provide better provision of subtitles on their programming, and direct audiences to where accessible content is available.**

# SUBSCRIPTION VIDEO ON-DEMAND SERVICES (SVOD)

Subscription video-on-demand services are services where people pay a monthly fee to access a library of programmes. Popular examples include Netflix or Disney+. 69% of respondents told us they had used a subscription service in the last year.

The most commonly used SVoD was

Netflix	Amazon Prime	Disney Plus
92%	72%	39%

Over 85% of respondents that used a subscription service in the last year and found that subtitles were not always available for the programmes they wanted to watch.

90% of respondents told us they believe that paid on-demand services should have to tell you how many of their programmes have subtitles before you pay. People with hearing loss or who are deaf who rely on subtitles to access content pay the same fees as other customers but get access to less programming.

In some cases, deaf people may take out a subscription for a particular programme only to find that it doesn't have subtitles available, or that there is a delay between the episode being released and subtitles being added. Despite paying the same as other customers, people who are deaf or have hearing loss have to wait longer to see the programmes they want to watch.

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of respondents told us they believe that paid on-demand services should have to tell you how many of their programmes have subtitles before you pay.

Over **85%**  
of respondents that used a subscription services in the last year found that subtitles weren't available for a programme they wanted to watch.

**SVoD services should inform customers what their provision of subtitled content is before they purchase a subscription.**

# ON-DEMAND FILMS OR TV BOXSETS

Only 7% of respondents told us they always found that the films or box sets they purchased had subtitles.

This means that many people will purchase these programmes or films and not realise that what they have bought is inaccessible.

Additionally, the customer service for a lot of on-demand programme stores are very hard to reach and often does not adequately address the issues faced when they purchase inaccessible videos.

SVoD services should ensure that subtitles are available for on-demand programmes at the same time that the programmes are released.

**7%**  
of respondents told us they always found that films or box sets they purchased had subtitles.

On-demand programme stores should ensure that their box sets and films that are available to purchase are available with subtitles.



I'm one of over 20,000 people calling on the Government for accessible on-demand TV!

**RN I.D.**  
Making life inclusive for deaf people and those with hearing loss or hearing aid

## SUBTITLES ON ADVERTS

Subtitle quotas on linear broadcasting currently cover programming, but there are no regulations on whether adverts on TV should provide subtitles or not. **69%** of respondents said that adverts should have subtitles. With 12 million people in the UK with hearing loss, companies are potentially missing a large audience with their message.

Our survey found that over half of respondents with hearing loss or who were deaf felt that they were missing out on information because an advert didn't have subtitles. This could include information about what products or promotions are available or important details.

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of people said that adverts should have subtitles.

**Companies should ensure that their video adverts on linear TV and on-demand programme services have subtitles.**



## BRITISH SIGN LANGUAGE INTERPRETATION



BSL is a language in its own right, with its own syntax, grammar and vocabulary. There are two types of BSL programming: BSL-presented programmes, where BSL is the main language in the show; and BSL interpreted TV where interpreters translate the speech from English to BSL.

Currently on linear TV, channels are expected to sign up to **5%** of their content either by making sign-presented programmes or by broadcasting sign-interpreted programmes. For smaller channels there are alternate requirements where they can choose between a monthly quota of up to 75 minutes of sign-presented shows or they can make a financial contribution towards the British Sign Language Broadcasting Trust (BSLBT) which commissions programming in BSL for deaf BSL users, it also runs the BSL Zone Player which hosts the programmes made by BSLBT.

A similar recommendation made for signed content in the Draft Media Bill, with a proposed **5%** target, but there is currently no explanation of potential alternative arrangements. In 2021, Ofcom reported that only S4C and BSL Zone Player achieved the proposed **5%** target.

**On-demand services should do more to meet and exceed the proposed 5% signing target before it comes into force.**

**Broadcasters should aim to exceed the 5% target for BSL content on linear TV.**



Signed content is an important access service for deaf BSL users as it allows them to watch TV in their first language. It can also be an important educational tool, helping people learn BSL and raise deaf awareness. It can also be an important form of representation for the Deaf community, with sign-presented content such as BBC's See Hear platforming shared experiences of the Deaf community.

Deaf BSL users may use both interpretation and subtitles to watch live English programmes. When asked what their preferred access service was to watch live English TV, 8% of BSL users said they preferred BSL interpretation, 39% said they preferred live subtitles, but 44% said they preferred to have both BSL interpretation and subtitles available.

We also found that the quality of subtitles and the BSL interpretation influences which access service deaf BSL users use to watch live TV.

60% of deaf BSL users told us they needed an interpreter to access live broadcasts of government announcements. During Covid 19, deaf BSL users missed out on crucial public health information when the Government consistently held briefings without an interpreter. Furthermore, the quality of subtitling is often much lower on live broadcasts, with either the timing so delayed that it can be hard to tell who is speaking, or having poor accuracy of subtitles, making it unclear what is said.

**52%**

of deaf BSL users prefer to watch live English TV with just BSL interpretation or BSL and live subtitles.

**The Government should ensure that they have a BSL interpreter present at any live announcements they make.**

## PERSONALISING ACCESSIBILITY FEATURES

Less than 50% of survey respondents were aware that you can change the appearance of subtitles on some on-demand services. However, over 65% of respondents who were aware of the features had used them.

More platforms are offering audiences the opportunity to personalise the appearance of subtitles, by changing the size, position, or colour, allowing people to choose formats which suit their needs best.

We found that people felt that the most important device to have personalisation features on was the television. This was also the most common form of device that people used to watch programmes. Older audiences are more likely to watch programmes on a television, but also more likely to have other conditions that may affect their eyesight and ability to read subtitles on screen.

Being able to change the size of subtitles, for example, means that people can access services in a way that is accessible to them. Indeed, 67% of respondents said that being able to change the size of subtitles on their television is important.

Less than  
**50%**

of survey respondents said that they were aware that you can change the appearance of subtitles on some on-demand services.

**Television manufacturers should consider integrating personalisation features into their devices. Then ensure that if those features are available that consumers know this.**



The feature that respondents would most like to be able to control is the position of subtitles. We found that 76% of respondents thought it was important to be able to change the position of subtitles on a television screen.

Currently, Ofcom recommends that 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 important to avoid obscuring the face as this conveys emotions and tone of voice, and is necessary for lip-reading.”

However, there may be contexts, such as during sports games, where people want to be able to follow the gameplay without subtitles covering the bottom of the screen and would prefer to position them higher. Giving people the flexibility to position subtitles themselves improves their TV watching experience.

We also asked whether people thought it was important to be able to change the colour of subtitles or have labels to show who is speaking. 47% of respondents said they thought it was important to be able to change the colour of subtitles on a television. 50% told us they thought it was important to have labels to denote who is speaking when watching on a television.

Over  
**70%**  
of respondents that watch programmes on their phone or tablet think it is important to be able to change the size and position of subtitling.

**On-demand services should ensure any applications they have allow people to watch programmes through their phone or tablet should include features to alter the size and position of subtitles.**

As more people watch on the go TV on their phone or tablet, some subtitle personalisation features may be more important than others. For example, we found that for respondents who watch TV on their phone, changing the size (72%) and the position (70%) was an important or very important feature that respondents wanted to see when watching TV on their phone. This was also found for tablets, where position (72%) and size (71%) were seen as important or very important features.

Finally, 72% of deaf BSL users felt that it was important to be able to change the size of the interpreter on their TV or mobile phone as having interpreters superimposed on a programme can obscure audiences from being able to see everything going on in the camera shot.

Less than  
**50%**  
of survey respondents said that they were aware that you can change the appearance of subtitles on some on-demand services.

**Ofcom should update its best practice guidance to encourage more platforms and devices to offer more personalisation features.**





# SUMMARY OF RECOMMENDATIONS

## For the Government

- To introduce the Media Bill to Parliament as soon as possible to ensure that there are no more significant delays to the legislation.
- To ensure that BSL interpreters are present at any live announcements.

## For Ofcom

- To update its best practice guidance to encourage more platforms and devices to offer more personalisation features.

## For On-demand Service Providers

- To prioritise ensuring that their programmes are available with subtitles whenever and wherever audiences want to access them.
- To do more to meet and exceed the proposed 5% signing target before it comes into force.
- To ensure any applications that allow people to watch programmes through their phone or tablet include features to alter the size and position of subtitles.

## For Broadcast Video on Demand

- To do more to push for platforms to provide better provision of subtitles on their programming, and better direct audiences to where accessible content is available.

## For Subscription Video on Demand

- To inform customers what their provision of subtitled content is before they purchase a subscription.
- To ensure that subtitles are available for on-demand programmes as soon as they are released.

## For On-demand Programme Stores

- To ensure that all box-sets and films that are available to purchase are available with subtitles and that it is made clear when they are not available.

## For Linear Broadcasters

- To ensure that any live sign-interpreted content also has subtitles available.
- To aim to exceed the 5% target for BSL content on linear TV.

## For Television manufacturers

- To consider integrating personalisation features into their devices and ensure that customers are aware of the availability of these features on their television.

## For Advertisers

- To ensure that their video adverts on linear TV and on-demand services have subtitles.

