

Accessible Advertising for All

Industry attitudes to making TV and VoD advertising accessible

A report by Sue Gray
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About the author

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About the commissioning organisation

Clearcast has over 50 years experience of clearing ads in the UK. Their mission is to enable advertising and help make getting an ad to air as smooth and stress-free as possible.
www.clearcast.co.uk

Accessible Ads for All

Research rationale

There are 12 million people in the UK who are deaf, have hearing loss or tinnitus (RNID) and over 2 million people in the UK living with sight loss (RNIB).

Under the Communications Act 2003, broadcast tv channels are required to make a certain proportion of their programmes accessible via subtitling, audio description or sign-presented programming. These commitments are tracked, monitored, and regulated by Ofcom.

However, despite the various technologies that exist to make broadcast and streamed programmes accessible to those with hearing and sight loss, there is currently no UK legislation to mandate that TV advertising should likewise be made accessible.

Whilst some companies and organisations do voluntarily include accessible features in their advertising, there is currently no industry tracking of the volume of accessible TV advertising broadcast or streamed on-demand.

Accessible advertising is an unknown quantity.

In March 2023, Clearcast, the UK's advertising clearance company, launched an 'Accessible Ads for All' campaign to raise awareness about this topic. Part of the campaign was a short industry-wide survey which aimed to: establish industry opinion about the perceived importance of TV advertising accessibility; to gain insight into current accessibility processes; and to get feedback regarding the barriers which prevent more TV advertising being made accessible.

Executive summary

The Clearcast survey was completed by a small and highly motivated sample of respondents who held a firm belief in the importance of making advertising accessible.

The companies and job-roles of respondents were highly relevant to the survey's exploration of how the industry might increase the volume of accessible advertising.

Whilst the sample itself is not representative of the TV advertising industry, it can offer well-informed insights into the perceptions of, and barriers to, making TV and VoD advertising accessible.

98% of survey respondents believed that accessible TV advertising is important and 77% of this motivated sample's companies had done some accessible advertising in the past 12 months. This was driven by their use of subtitling with the use of audio description (AD) and British Sign Language (BSL)/ signing at a much lower level.

The main barriers cited by respondents that prevented accessible advertising were lack of knowledge, perceived cost, timing issues and, to a lesser extent, creative considerations.

Barrier one: 4/10 said lack of knowledge regarding standards and process is a barrier:

"If there was clear guidance and standards on accessibility, I think accessibility would be included by default on all ads" (Production Company)

Barrier two: 4/10 said cost is a barrier but others believed costs were much reduced:

"Client budgets are very tight, we can't afford to include it as standard and they often can't or won't pay extra for it." (Creative Agency)

"AD and subtitles are much cheaper and easier now so there's no excuse not to include them for a client for free." (Creative Agency)

Barrier three: 1/3 said timing is a barrier:

"Most agencies aren't given the time to include audio description/BSL in their production schedules." (Traffic Agency)

Barrier four: 1/5 said creative considerations are a barrier:

"Making accessible creative doesn't mean it has to be boring. Why aren't there more examples of entertaining creative that take into account accessibility?" (Creative Agency)

Lack of industry data tracking the volume of accessible advertising was not mentioned spontaneously as a problem by respondents. However, when informed that industry tracking is not in place, respondents clearly grasped the role for improved data at an industry level to help drive change.

"Measure everything please! Accessibility needs all the help it can get to make a business case and draw attention." (Creative Agency)

Given the group of respondents were committed to accessibility, the barriers they mention are likely to be even more of a hurdle within the wider TV advertising community.

Recommendations

Considering each barrier in turn, alongside the verbatim comments made, it is possible to identify five industry enablers that should lead to a growth of accessible advertising:

1. Produce and promote industry-wide guidance and standards.
 - 6/10 survey respondents were interested in joining an industry working group to further understand and improve accessibility.
2. Clarify costs for the different features of accessibility.
3. Establish creative implementation training.
 - 9/10 respondents were interested in expert-led/Clearcast training.
4. Establish the industry tracking data required to drive change.
 - 9/10 support Clearcast's proposal to track the volume of subtitled advertising for the industry via their central Library system.
 - Identify industry tracking solutions for audio description and BSL /signing.
5. Include accessibility in the creative brief from the start.

Many of the barriers that prevent accessible advertising may be avoided simply by considering accessibility earlier in the advertising process. A mutual responsibility for creative agencies and advertisers was acknowledged to bring accessibility considerations into the briefing stage, thereby including costs from the start and avoiding last-minute timing problems.

"It is still not something that is thought of upfront when a campaign gets briefed in. More needs to be done to encourage clients to think of accessibility from the start so that production can factor this into budgets and timings etc."
(Creative Agency)

Research methodology

Clearcast compiled a short industry survey with the support of their shareholder broadcasters and the industry bodies Thinkbox, the Advertising Association, ISBA, the IPA and the British Arrows.

The aim of the survey was to gather anonymous opinions from across the industry about the perceived importance of TV advertising accessibility, to gain insight into current accessibility processes and, in particular, to get feedback regarding any barriers to making more TV advertising accessible.

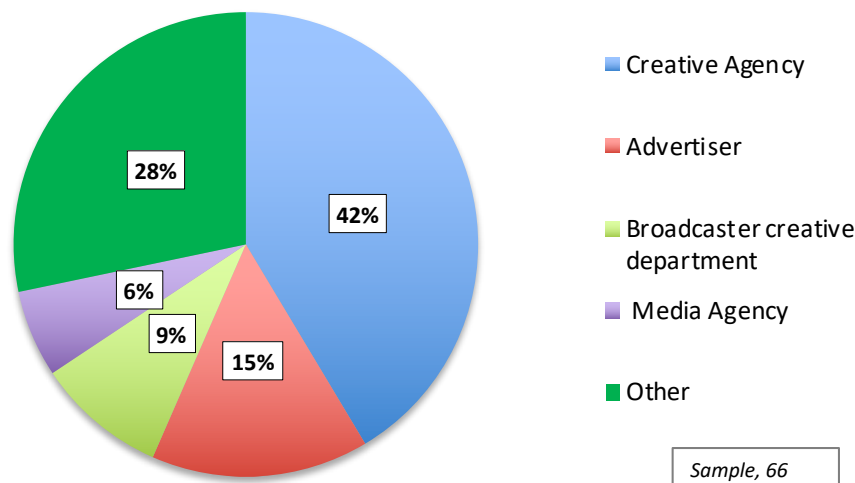
The survey was launched on 3rd March 2023 and closed on Tuesday 18th April 2023. It was distributed via email as part of Clearcast's newsletter and via Clearcast's social accounts. Following launch, and throughout March and April it was also distributed via the email newsletters and social accounts of Sky, Channel 4 and the industry bodies mentioned above.

By closing date, the number of respondents who had submitted a completed survey was 66.

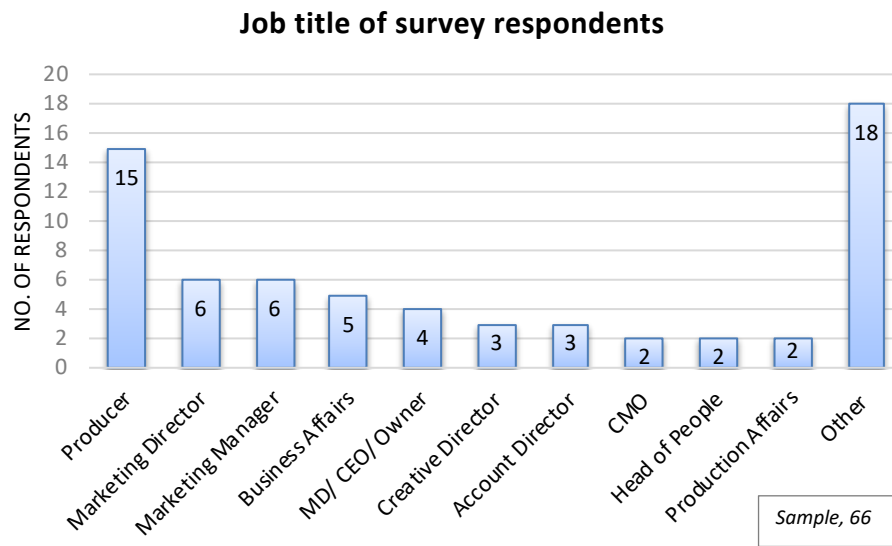
Results

Whilst the sample was small, the survey was completed by highly relevant people, with over half of respondents coming from either creative agencies or advertisers.

What type of organisation do you work in?



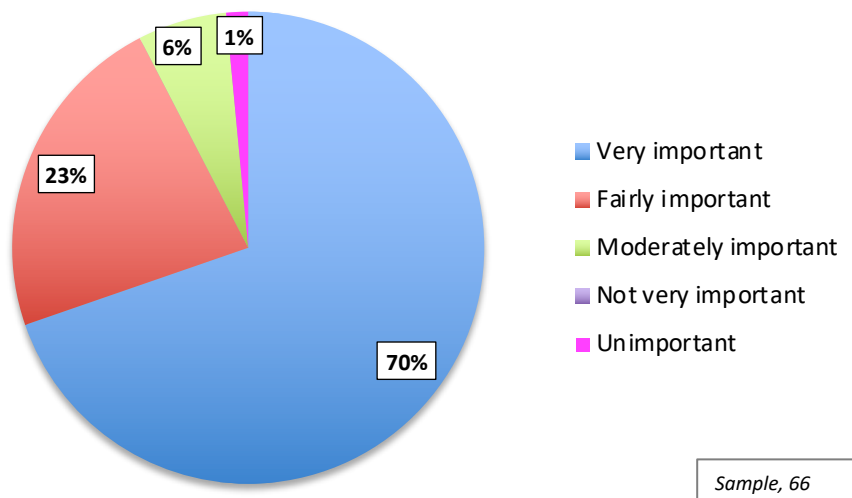
Survey respondents spanned a wide range of roles with the most common job title of respondents being *Producer* followed by *Marketing Director* and *Marketing Manager*.



Importance of accessible TV advertising

Amongst respondents, there was an overwhelming belief that TV advertising should be accessible with 98% respondents rating it is important and seven in ten saying it was *very important*.

How important is it to you that TV ads are accessible?



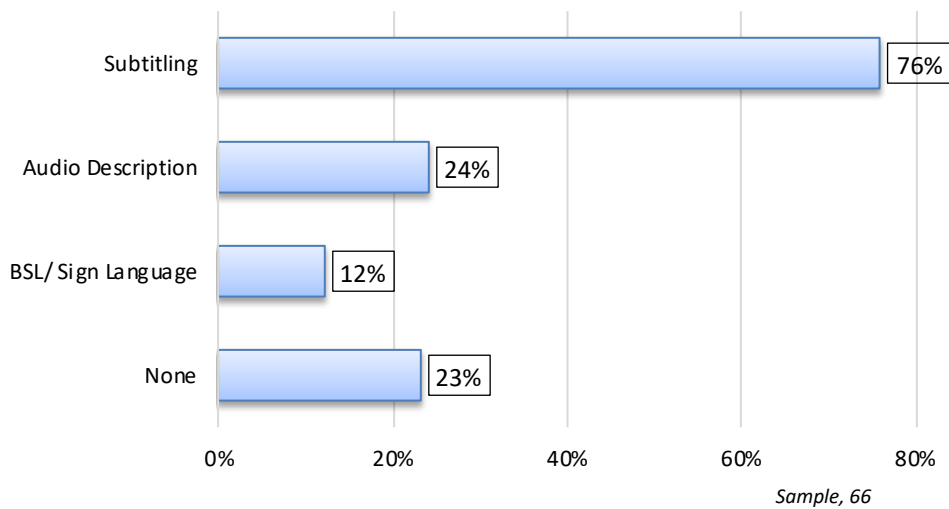
Given the self-selecting nature of the sample, this level of positivity was perhaps to be expected. However, the reasons they give for this importance yield some interesting insight, spanning a fundamental belief in equality, diversity, and inclusion to a more business-focussed rationale of maximising audience reach for advertiser products.

“Everybody should be able to experience television to its best. Love them or hate them, commercials are a part of the television experience and can in and of themselves be talked about as much as the programmes they are in. Those with visual or audio impairments should not be excluded from such discourse, or indeed the intention of the commercial to advertise a products or service they might, need or want.” (Broadcaster, creative department)

Accessible features used in the past 12 months:

- Subtitling was the most used feature of accessibility by respondents’ companies: three quarters claimed that their organisation had used subtitling in the past 12 months for TV and VoD advertising.
- Audio description had been much less used: one quarter had used audio description in their TV and VOD advertising in the past 12 months.
- The use of BSL /signing in this timeframe was lower still: used by just one in ten respondent organisations.

Which accessibility features has your organisation used in their TV and VoD advertising in the last 12 months?

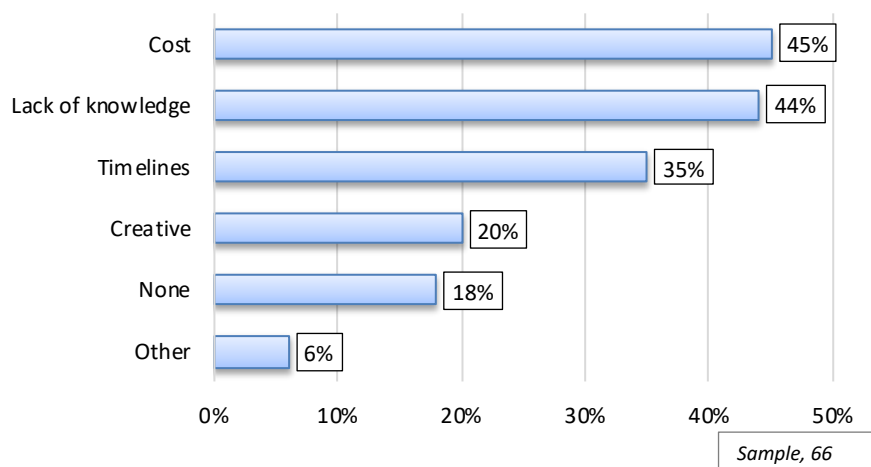


Barriers to making accessible TV advertising

A quarter of respondents said that their organisation had not used any aspect of accessibility in their TV or VoD advertising in the past 12 months.

The broad issues that prevent organisations from making their advertising accessible are spread across a range of reasons: **cost** and **lack of knowledge** were the two main blockers, followed by **timelines** and **creative considerations**.

Which issues prevent your organisation from making ads accessible?



When probed for more detail regarding barriers to making accessible TV advertising, some more nuanced points emerged:

"It would be great to have best practice guidance on how best to subtitle or audio describe and what considerations should be on taken on board in the pre-production stages."

"Making accessible creative doesn't mean it has to be boring. Why aren't there more examples of entertaining creative that take into account accessibility?" (Creative Agency)

The importance of tracking, industry collaboration and training

When prompted, respondents clearly grasped the role for improved data at the industry level to help drive change:

"Measure everything please! Accessibility needs all the help it can get to make a business case and draw attention." (Creative Agency)

In the absence of industry data, the majority (9 in 10) supported the suggestion that Clearcast collect and aggregate the volume of subtitled TV advertisements:

“Being able to demonstrate such data would be extremely useful to encourage clients to do the same and make it feel the norm / best practise.” (Creative Agency)

A very small minority expressed negativity about Clearcast extending into this space.

There was also a high level of willingness to get involved, with six in ten saying that they were willing to join an industry working group to help the industry progress towards increased accessibility.

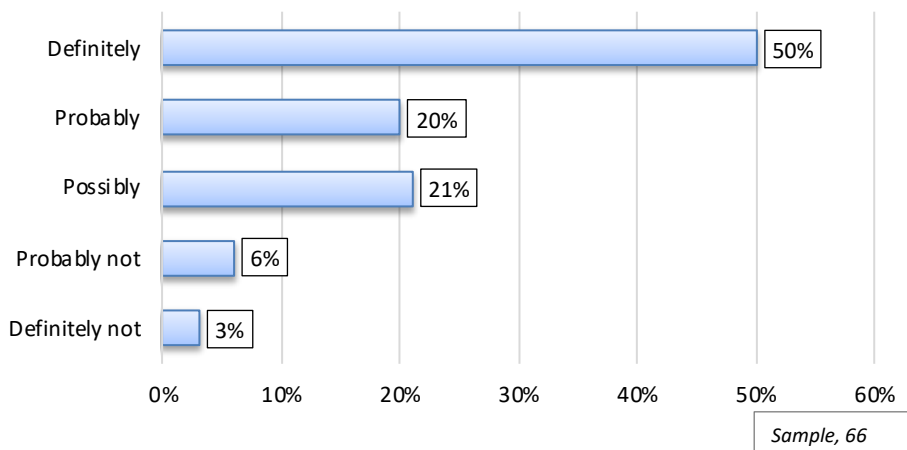
Those interested believe that if such a group created clear guidance and standards that this would drive change:

“There is a desire to do more but a lack of knowledge and understanding of the processes and resources that are needed to drive change.” (Broadcaster, creative department)

“If there was clear guidance and standards on accessibility, I think it would be included by default on all ads.” (Production Company)

A strong interest in training regarding creative considerations when making accessible advertising was also expressed: five in ten expressed definite interest in expert-led / Clearcast training, with nine in ten interested to some extent.

Creative considerations for accessibility: would you be interested in expert led / Clearcast training?



“Subtitling is easily implemented whereas AD requires more intensive planning and coordination pre going on air. AD is ideally built in at the storyboard stage.” (Advertiser)

Conclusion

The survey captured the opinions of professionals who are committed to making advertising accessible. As such, it offers well-informed insights into the perceptions of, and barriers to, making TV and VoD advertising accessible.

Given this group of respondents are committed to accessibility, the barriers they mention are likely to be even more of a hurdle within the wider TV advertising community.

Perceived costs, lack of knowledge about the process and timing pressures are the overt primary barriers preventing more accessible advertising being made.

Amongst this motivated group, there was a strong appetite for actions to drive change such as training in creative implementation and industry tracking to monitor the volume of accessible TV/ VoD advertising. There was also high willingness to get involved in the creation of industry guidance and standards. A willing professional cohort exists ready to collaborate for change.

In summary, the five key enablers of increased volumes of accessible advertising are:

1. Produce and promote industry-wide guidance and standards.
2. Clarify costs for the different features of accessibility.
3. Establish creative implementation training.
4. Establish the industry tracking data required to drive change.
5. Include accessibility in the creative brief from the start.