



**UGANDA  
COMMUNICATIONS  
COMMISSION**

**GUIDELINES FOR ENABLING TELEVISION ACCESS FOR  
PERSONS WITH DISABILITIES IN UGANDA.**

## **TABLE OF CONTENTS**

1.0 INTRODUCTION.....	1
2.0 SCOPE AND JURISDICTION.....	2
3.0 SETTING TARGETS AND TIMEFRAMES .....	2
4.0 DEFINITIONS.....	4
5.0 GENERAL GUIDELINES APPLYING TO ALL ACCESS PROVISION.....	6
6.0 GUIDELINE FOR SUBTITLING (CAPTIONING) .....	8
7.0 GUIDELINES FOR AUDIO DESCRIPTION .....	11
8.0 GUIDELINES FOR SIGNING AND SIGN LANGUAGE.....	14
9.0 COMPLYING WITH THESE GUIDELINES.....	17

## 1.0 INTRODUCTION

**Article 35 of the Constitution of the Republic of Uganda** provides that “persons with disabilities have a right to respect and human dignity, and the State and Society shall take appropriate measures to ensure that they realize their full mental and physical potential and that Parliament shall enact laws appropriate for the protection of persons with disabilities”. Consequently, the Parliament enacted the Persons with Disabilities Act, 2019 that provides for the respect and promotion of the fundamental and other human rights and freedoms of persons with disabilities.

Section 12 of the Persons with Disabilities Act 2019 provides for Nondiscrimination in the provision of services on a commercial basis.

**Section 12(1)** provides that **“A person who provides services to the public on a commercial basis shall make the services available and accessible to persons with disabilities.”**

**Section 12(4)** further provides that **“An owner or a person in charge of a television station shall, provide or cause to be provided sign language insets in all newscasts.”**

**Section 12(6)** mandates the Minister responsible for communication, in consultation with the Council, to make regulations defining the standards for access to information by persons with disabilities.

The Uganda Communications Commission directed all licensed Television operators in Uganda to comply with the Persons with Disabilities Act 2019. However, during the implementation of this directive, the Commission has noted some lack of consistency in the application of sign language. These range from lack of uniformity on the size of insets which is a result of the lack of a standard format prescribed in the application of sign language.

The Commission has also received written complaints from the Uganda National Association of the deaf (UNADS) regarding the poor quality of interpretation services and very small TV insets. Other complainants have shared that most televisions don't cover sign interpreters at press conferences even when the services are available, since they cut them out of the screen when covering such press conferences.

The Commission has therefore developed guidelines to enable television access for Persons with Disabilities. The guidelines set out the requirements for television access services that include subtitling or captioning, sign language and audio description that will apply to television services licensed in Uganda.

## **2.0 SCOPE AND JURISDICTION**

Television broadcasters based within the jurisdiction of the Republic of Uganda must comply with the provisions of the guidelines for enabling television access for persons with disabilities

The Guidelines shall not apply to non-broadcast content, including content provided via on-demand players provided by broadcasters and which are available online. Notwithstanding this, the Commission recognises that broadcasters provide accessible programming via on-demand players and welcomes the continuation or further introduction of such provision online.

## **3.0 SETTING TARGETS AND TIMEFRAMES**

In setting targets and timeframes for the implementation of the guidelines for television access for persons with disabilities in Uganda, the Commission will do so with reference to the following principles:

### **(i) Access**

A guiding principle for the Commission is that those citizens for whom the guidelines are designed should have the fullest possible access to the broadcast media and to its capacity to educate, inform and entertain. This principle is evident in the guidelines in that all licensed broadcasters come under the jurisdiction of the rules.

### **(ii) Excellence**

This principle recognises the fact that the guidelines are not only concerned with the provision of subtitling, audio description and Sign Language but also with the standards and consistency which must be used and attained in their delivery, including best practice guidelines in both audio and visual presentation. To this end, the Commission will develop a set of standards and guidelines that broadcasters must attain to ensure a quality access service.

### **(iii) Incremental progression**

This principle acknowledges that the level of subtitling, audio description and Sign Language will develop incrementally over a period. This will facilitate broadcasters to further develop their capacity and expertise to deliver this service. The Commission proposes the use of a five-year timeframe based on the principle of increasing access provision in incremental stages, allowing the broadcaster to plan for the development and delivery of quality access provision. It acknowledges that there are several issues other than funding which need to be addressed to increase access provision.

#### **(iv) Responsiveness**

This principle aims to ensure that the development of access provision (subtitling, Sign Language, and audio description) should be in response to the needs and priorities as expressed by the user groups as well as standards laid down by the Commission, in consultation with the broadcast provider. Despite the above principles, it is important to note that Section 12 of the Persons with Disabilities Act 2019 provides for Nondiscrimination in the provision of services on a commercial basis.

**Section 12(1)** provides that ***“A person who provides services to the public on a commercial basis shall make the services available and accessible to persons with disabilities.”***

**Section 12(4)** further provides that ***“An owner or a person in charge of a television station shall, provide or cause to be provided sign language insets in all newscasts.”***

The above provisions mean the Commission will provide policy advice to the Minister and hope that as mandated in Section 12(6), the Minister responsible for communication, in consultation with the Council, will make regulations defining the standards for access to information by persons with disabilities.

In implementing the Commission will consider the following influencing factors to determine the specific access targets and the specific timeframes associated with those targets, in a manner which reflects the individuality of each service under consideration:

- i. **Differentiation between broadcast services:** The Commission will differentiate between broadcasters based on several factors like the nature of the broadcast provider, the stage of development of the broadcast provider, the level of current provision, the type of programming schedule, the technical and human resource cost, technical capacity
- ii. **Funding:** The Commission has had regard to the likely financial impact of any requirement to comply with targets and timeframes likely to be set for the provision of access services. In particular, the Commission has examined the type of programming across various schedules, including the number of repeat programmes as this has a bearing on the costs. The Commission also had regard to the nature of the broadcaster, whether it is a private commercial or publicly funded entity. However, it should be noted that it is difficult to arrive at definitive costs, as in many instances the cost will depend on the scheduling decisions made by broadcasters, the type of programming and the decisions made about what programming they are going to prioritize for access provision.

## **4.0 DEFINITIONS**

### **Subtitling/Captioning**

Subtitling or Captioning is on screen text that represents what is being said on the television screen. Subtitling (Captioning) can be open and closed.

Open subtitling is subtitling that always remains on the screen. Closed subtitling can be added to the picture or taken away as viewers may wish.

### **Sign Language**

Sign Language is the visual, spatial language with its own syntax and complex grammatical structure. Signing must be presented on a television screen through the use of a signer as part of the programme content, or the use of a signer (either a real person or a virtual person generated by a computer) acting as an interpreter in a box super imposed in the corner of the screen.

### **Audio Description**

Audio description is a commentary that gives a viewer with a visual impairment a verbal description of what is happening on the screen at any moment as an aid to the understanding and enjoyment of the programme. The technique uses a second soundtrack that gives a description of the scene and on-screen action.

### **Users**

It is important to note that People using television access services do not fall neatly into homogenous groups. For example, many people that might require audio description have visual impairments, but by no means all are completely blind, and most have had some vision at some time. By the same token, those that might need to use subtitles (Captions) can range from those with normal hearing (using subtitles so that the television sound can be turned down), through those with relatively minor hearing loss, to those who are profoundly deaf. Some people (particularly the deafblind) may benefit from more than one access service – certain conditions that lead to the loss of one sense may also impair another. Those using access services range from very young to older people, but a significant proportion of viewers using access services are older people, as the incidence of hearing and sight loss increases with age.

### **Selection and scheduling of programmes**

In selecting and scheduling programmes, broadcasters should seek advice from disability groups about how best to maximise the benefits to those with hearing and/or sight impairments. When a series of programmes commences with access services, every effort should be made to ensure that all programmes in the series are accompanied by the relevant access services. If unforeseen problems prevent this, and a repeat is scheduled shortly, a continuity announcement should be made (and subtitled) explaining when the repeat can be seen with the appropriate access services. An on-air apology

should also be broadcast, preferably both before and after the programme. If this is not possible, because a technical fault does not come to light until after the programme has been broadcast, an apology should be broadcast at the beginning of the next programme in the series.

### **Monitoring for consistency and quality**

Broadcasters should monitor playout at regular intervals to ensure that scheduled access services are being provided correctly. The failure to access services is just as disruptive for those who rely upon them as a break in transmission would be for others. Where practicable, broadcasters should insert an apology (either spoken or subtitled, as appropriate) as soon as a problem has been identified, with a brief explanation of the cause.

Broadcasters should also regularly monitor the quality of their access services. Focus groups and feedback from individual viewers can be a helpful indicator of quality.

### **Consultation and feedback**

There should be consultations periodically with groups representing access services users on issue such as the quality of access services, and the selection and scheduling of programmes. To facilitate feedback from access service users, broadcasters should also provide contact details on their websites, including e-mail addresses and telephone and textphone numbers. Broadcasters should monitor and respond to this feedback.

### **National emergencies**

In order that television access service users are kept informed about national and local emergencies, it is important that broadcast information, including relevant telephone numbers, is subtitled (preferably in open captions) leaving sufficient time to write the details down and spoken.

## **5.0 GENERAL GUIDELINES APPLYING TO ALL ACCESS PROVISION**

### **Quality Standards:**

The objective of these guidelines is to promote the understanding and enjoyment of television programmes. This is achieved via the provision of subtitling, Sign Language, and audio description. In this context, the Commission has developed standards that will apply to the provision of access services.

Maintaining quality access provision is essential for ensuring that audiences using these services benefit from them. Broadcasters shall take steps to monitor content at the point of transmission to ensure quality standards are met. These guidelines acknowledge that broadcasters cannot always control the quality of access services received by audiences using different television platforms e.g., cable, free-to-air, satellite etc. However, broadcasters shall engage with platform providers with a view to resolving any issues that may arise from time to time.

### **National Events and Programmes:**

To ensure that audience members requiring access services are kept informed about national events, broadcasters shall ensure that any key information provided by government on-air, including relevant telephone numbers etc., is subtitled (preferably in an open format) and spoken, leaving sufficient time for the audience to take note of and/or write the details down. Unless impracticable, it should also be provided via Sign Language.

Broadcasters shall also ensure that, in coverage of public events, Sign Language interpreters in attendance shall be clearly visible and understandable to audiences throughout the entirety of the broadcast.

### **Promotion of Access Provision:**

In all promotions of programme featuring access services and at the beginning of the broadcast of any such programme, broadcasters shall make use of a standard symbol indicating that the programme is accessible.

Broadcasters shall ensure that any listings created and featured in print, broadcast or online (including via social media) indicate those programmes for which access provision is available and the type of provision, except where it is not possible to do so and where this can be clearly demonstrated.

Broadcasters shall regularly promote on their television services the existence and usage of the form(s) of access provision available on their services.

### **Obligation to Consult with the Users:**

Broadcasters shall consult periodically, with groups representing a range of different access user groups, to seek their opinions as to their viewing preferences, the performance of the broadcaster against the guideline and other related matters.



**Access Liaison Officer:**

Broadcasters shall nominate an individual(s) to deal with queries from audiences in respect of the application of these guidelines on their service(s).

Contact details for the Access Liaison Officer shall be publicly available, for example, via the website of the broadcaster. Contact information shall be provided in an accessible manner.

## **6.0 GUIDELINE FOR SUBTITLING (CAPTIONING)**

Subtitling is text on screen representing speech and sound effects that may not be audible to people with hearing impairments, synchronised as closely as possible to the sound.

### **Users**

People using subtitling range from those who have become hard of hearing in later life, to those who have been profoundly deaf since birth. Many people with good hearing also use subtitles so that they can watch television with the sound muted (e.g. so that they can simultaneously talk on the telephone), or learn English, but they are not the target audience. For the deaf, and those suffering severe hearing loss, subtitles are likely to be the most important source of audio information. Viewers with a mild hearing loss to moderate hearing loss are likely to rely on subtitles to aid their hearing rather than as a substitute. But all are likely, consciously or subconsciously, to lip read to a degree. Subtitle users reflect the full range of proficiency in English. While the varying needs of subtitling users make it difficult to provide subtitling that suits everybody, the guidelines below reflect generally accepted practice.

### **Selection and scheduling of programmes**

Broadcasters should give priority to all newscasts throughout the day and live telecasts of national events as subtitling on these is likely to benefit most people. Broadcasters should also bear in mind subtitling programmes likely to be of more interest to older people, as these account for a large proportion of subtitle users, many of whom watch television a lot.

### **Presentation:**

Broadcasters are encouraged to use antialiasing techniques to help make the appearance of subtitles clearer. 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 particularly important to avoid obscuring the face, as this conveys emotions and tone of voice, as well as being necessary for lip-reading.

### **Pre-recorded and live subtitles:**

Pre-prepared block subtitles are the best approach to providing accurate, easily legible and well-synchronised subtitles and should be used for pre-recorded programmes. Recommended colours are white, yellow, cyan and green against a solid black background as these provide the best contrast. When scrolling subtitles need to be used, any scripted material should be used for advance preparation. In addition to achieving the highest possible levels of accuracy and synchronisation, live subtitles should flow continuously and smoothly.

**Lay-out:**

Subtitles should normally comprise a single sentence occupying no more than two lines, unless three lines will not obscure the picture. If necessary, sentences should be broken or reformed into more than one sentence at natural linguistic breaks so that each subtitle forms an understandable segment. Where breaks occur, the split should be made in a way that makes clear that there is more to come. This can be achieved by ending the first subtitle with a conjunction, a colon or semi-colon as appropriate, or even a short run of dots. Line breaks within a word must be avoided.

**Non-speech information:**

In addition to speech, subtitles should clearly describe relevant non-speech information, such as the mood of any music playing and the words of songs if possible (using the # sign to precede and conclude music), louder speech (using capital letters), inaudible mutterings or incoherent shouts etc. (which should be explained as such). Subtitles should be displayed horizontally in the direction of any sound effects, and where the source of speech is not immediately apparent the first subtitle should have a caption to label the source. Italics or punctuation marks may be used to indicate emphasis. Where long speechless pauses in programmes occur, an explanatory caption should be inserted. Different colours should be used to denote different speakers. Subtitles should be used to identify the source of off-screen/off-camera speech where this is not obvious from the visible context.

**Synchronization of speech and subtitling:**

The aim should be to synchronise speech and subtitling as closely as possible. Subtitle appearance should coincide with speech onset and disappearance should coincide roughly with the end of the corresponding speech segment. If necessary, subtitling may be edited conservatively if this is necessary to avoid long delays between speech and subtitling. In live programmes, the aim should be to keep the inevitable delay in subtitle presentation to the minimum (no more than 3 seconds) consistent with accurate presentation of what is being said. If possible, subtitles should not over run shot changes and should commence on a shot change when synchronous with the start of speech.

**Speed of subtitling:**

The speed should not normally exceed 160 to 180 words per minute for pre-recorded programmes. Although it may not be practicable to restrict the speed of subtitles for all live programmes, commissioning editors and producers should be aware that dialogue which would require subtitles faster than 200 words per minute would be difficult for many viewers to follow. Consideration may be given to displaying three lines of subtitling rather than two, to allow longer for the subtitles to be read, provided that this does not obscure important parts of the picture. Slower speed and more heavily edited subtitles are appropriate for young children, though care should be taken to ensure

that these are accurate and grammatical, as children and parents use subtitles in developing literacy skills.

**Accuracy:**

Subtitle users need to be able both to watch what is going on, and to read the subtitles, so it is important that these are as accurate as possible, so that viewers do not need to guess what is meant by an inaccurate subtitle. Broadcasters should ensure that subtitles for pre-recorded programmes are reviewed for accuracy before transmission. Where live subtitling is to be provided, advance preparation is vital – where possible, any scripted material should be obtained, and special vocabulary should be prepared. The subtitling for repeated programmes first broadcast live should be reviewed and edited if necessary.

**Publicity:**

The word ‘Subtitles’ should be displayed legibly on the screen at the start of the programme.

## **7.0 GUIDELINES FOR AUDIO DESCRIPTION**

Audio description is a service primarily aimed at blind or visually impaired people. It comprises a commentary woven around the soundtrack, exploiting pauses to explain on screen action, describe characters, locations, costumes, body language and facial expressions to enhance meaning and enjoyment for blind or visually impaired viewers.

### **Users**

While people with visual impairments are drawn from all age ranges, a majority will experience loss of some or all of their vision later in life, for example, as a result of macular generation. Accordingly, audio describers should take account of the fact that most potential users of audio description will have some sight or will have had sight at some stage.

### **Selection and scheduling of programmes**

Although visually impaired people like to watch the same sorts of programmes as everybody else, not all programmes lend themselves to audio description. Some programmes are too fast-moving, or offer little opportunity to insert audio description (e.g. news), or may not be significantly enhanced by the provision of audio description (e.g. quiz programmes).

### **What to describe:**

to the extent relevant to the storyline, audio description should describe characters, locations, time and circumstances, any sounds that are not readily identifiable, on-screen action, and on-screen information.

### **Characters:**

Identifying and describing characters is vital to effective audio description. Key features should be identified as soon as practicable, to help identify the person in the listener's mind's eye and avoid the need for long-winded and confusing description. But do not give the name away if the plot requires the character's identity to be revealed at a later date. When describing characters, aspects such as dress, physical characteristics, facial expression, body language, ethnicity and age may be significant. Don't shy away from using colours or describing a character as pretty, or handsome, where relevant to the story. Generally, names (rather than 'he' or 'she') are used more often than in normal speech, so as to avoid confusing the audience, particularly when there are several people taking part in a dialogue.

### **On-screen action:**

Wherever possible try to describe at the same time as the action occurs. This is particularly important with regard to comic situations, where the audience, sighted and visually impaired, should be able to laugh at the same time. Where relevant, key backreferences can be included. It may be necessary to set up the next scene during the current description.

**Settings:**

When describing locations, try to cover scene changes where possible. the locations (including scene changes wherever possible); the time of day/season/date setting where appropriate; any sounds that are not readily identifiable; and on-screen information. The description should not censor what is on screen. However, it should not be necessary to use offensive language, unless (for example) when referring to content that is integral to understanding the programme, such as graffiti scrawled on a wall.

**What not to describe:**

The description should only provide information about what can be seen on the screen. Information unavailable to the sighted viewer should not be added though discretion is always necessary. Generally, 'filmic' terms such as camera angles should not be used.

**When to describe:**

Audio description should not encroach on dialogue, important or complementary sound effects, or critical sound effects unless really necessary. Even then, audio description should only be used to impart relevant information when the dialogue or other sound is inconsequential, or to read subtitles or on-screen captions. To differentiate between subtitles and description the describer should do this by either the use of their voice (e.g. stating the obvious, 'He says in Russian...' or 'A caption reads...') or a second voice. During opening titles and end credits, care should be taken to avoid clumsy overlaps with song lyrics. During songs, audio description should ideally where there is a reprise of the lyrics and where the lyrics are not relevant to the storyline.

**Language:**

Audio description provides a real-time commentary, so should generally be in the present tense (he sits), the continuous present (he is sitting) or the present participle ('Standing at the window, he lets out a deep sigh'), as appropriate. Variety is important, particularly with verbs. 'She scuttles into the room' rather than the simple fact 'She enters the room' creates a clearer image for the viewer (a Thesaurus is always useful). Adverbs are a useful shorthand to describing emotions and actions, but should not be subjective. Vocabulary should be matched to the genre of the programme, and should be accurate, easily understood, and succinct.

**Delivery:**

Delivery should be steady, unobtrusive and impersonal in style (but not monotonous), so that the personality and views of the describer do not colour the programme. Avoid the term 'we see'. However, it can be important to add emotion, excitement, lightness of touch at different points in different programmes to suit the mood and the plot development – the style should be

matched to the genre of the programme. Diction should be clear, and not hurried – every word should be clear, audible and timed carefully so that it does not overrun subsequent dialogue. The aim should be to enhance the enjoyment of a programme not to distract from it.

### **Balance:**

Judgement is needed in striking an appropriate balance between the amount of detail that is conveyed, and the risk of overburdening the audience with detail and detracting from the enjoyment of the programme. Too much description, even where there is a lot of space for description, can make it difficult for viewers to absorb information. The programme should be allowed ‘to breathe’. On the other hand, long gaps in the dialogue may need to be explained if the viewer is not to be left confused. If a slot available for audio description is short, it is better to focus on key moments and dynamics rather than to rush the description or fill every available moment. For example, it may be distracting in dance or fight scenes to describe every piece of action. A consistent approach is important: if a description starts out as detailed, it should not suddenly become scant.

### **Describers:**

Describers should be chosen to fit the genre, the nature of the programme and the intended audience. Ideally, the same people should be used to describe a series of programmes, both to ensure a consistent style (e.g. in terms of level of detail) and because the description forms a part of the programme for users.

### **Children’s programmes:**

Language and pace of delivery for children’s TV need particular care, having regard to the age and background of the target audience, as well as feedback from children and their parents. A more intimate style may be appropriate than would be the case for programmes aimed at adults.

### **Publicity:**

Periodic announcements should be made about programmes with audio description.

### **Product placement:**

Where a programme is signalled on screen as containing product placement, the audio description should say "this programme contains product placement". However, this information should not intrude in the normal audio description; it is paramount that the audio description first and foremost fulfils its primary function of making the programme itself accessible.

## 8.0 GUIDELINES FOR SIGNING AND SIGN LANGUAGE

Sign language comprises the use of manual gestures, facial expression, and body language to convey meaning. This is a distinct language with different syntax and vocabulary from English.

### **Format**

There are two ways of providing sign language access to programmes:

- (i) Interpretation:** A person interprets, and signs live or recorded programmes or programme segments. The image of such an interpreter is usually superimposed on a programme. This is referred to later in this document as an overlay insert.
- (ii) Presentation:** A sign language presenter, narrator or reporter provides the main language in the programme or programme segment. The signs are then interpreted into a 'voice over', with the addition of subtitles or captions as appropriate.

Signed programmes may be presented or interpreted into sign language. Sign language users particularly appreciate programmes presented in sign language; young deaf children who are learning sign language find it easier to understand and enjoy programmes presented in sign language, than those interpreted into sign language. Signed programmes, whether presented or interpreted in sign language, may be subtitled, to make it easier for people using both signing and subtitling to understand and enjoy them.

### **Users**

Some people who are deaf or have significant hearing impairments (usually those who are profoundly deaf, often from birth or early in life) use Sign Language as their preferred form of communication. Young deaf children who are not yet literate in English rely particularly on sign language to understand and enjoy children's programming.

### **Signing competence**

Broadcasters should ensure that sign language interpreters have a level of competence and fluency in Sign Language. Broadcasters should only employ qualified interpreters that have obtained training/accreditation from a recognized Institution

Sign language presenters, reporters and interpreters should be appropriately qualified, both to use sign language of native competency, and to communicate effectively through television. Some latitude is allowed for guests and interviewees, though broadcasters should ensure that are understandable.



## **Dress Code**

The signer should use a style of interpretation and wear clothing that is appropriate to the style of the programme. For example, sober and business-like clothing should be worn for news and current affairs programming, while a more colourful and informal style of dress would be appropriate for children's programmes. It is important that signers' clothing allows them to be seen distinctly against the picture.

## **Size and shape of overlaid inserts**

The size of the overlay must ensure that the body and facial expressions referred to above are easily discernible from normal viewing distances. Where practicable a signer's image, when at rest, that is notionally framed to occupy at least one sixth (1/6) of the picture area would normally be sufficient to ensure this condition is met.

For programmes primarily aimed at deaf people and in the "open" format a useful technique, can be to reduce the visual image by, for example, 25 per cent and use the subsequent blank area to place the interpreter. The image of the signer superimposed upon the original programme should generally appear on the right hand of the screen and occupy a space no smaller than one sixth (1/6) of the picture.

## **Techniques and off-screen sounds:**

The signer should use appropriate techniques to indicate whose speech he or she is interpreting, and to draw attention to significant sound effects. The sign language interpreter or presenter should indicate the presence of off-screen sounds (e.g. a ringing telephone, the knocking of a door or a gunshot) where these are important to the understanding of the programme.

## **Speaker identification**

This can be achieved by the signer using such techniques as referencing to a person by shifts in the eye gaze and body positioning or giving the speaker's name and reflecting his or her manner. (This technique is known as characterization).

## **Delivery:**

Different methods of delivery are permissible, provided that the provision of sign language complies with the guidelines, and that it is available in a form that is accessible to all viewers who want it, without the need to purchase special equipment or services. For example, broadcasters may choose to use interactive services to provide a signed version of a programme simultaneously with an unsigned version, provided the interactive option is publicised at the beginning of the programme, is full-screen and complies with the standards set out in these guidelines. Broadcasters may also use 'closed' signing should this become feasible.

## **Synchronising**

Sign language interpretation should start at the same time as speech. This may not always be practical during the interpretation of live programmes. The use of autocues has been found to be a useful aid to deaf interpreters and can help towards synchronism. The timing of signed sentences should be as close to speech as possible. Equally with sign language presentation, a “voice over” sentence should also be as close to the sign language as possible.

## **Monitoring**

Broadcasters should monitor the effectiveness of the service through instituting mechanisms for receiving audience feedback from deaf people and their representatives.

## **Apology for loss of service**

Where practical, a visual caption or subtitle should be displayed when there is a breakdown in the service.

## **Quality of display**

The presentation of the signer on the display screen should be of sufficient size and resolution to show all movements of the full upper trunk together with arms, hands and fingers, shoulder, neck and all relevant facial movements and expressions. All-important gestures that convey meaning through sign language must be easily and accurately recognised.

## **Choice of dress and background colours**

It is important that the person signing is clearly distinguished, for example by means of contrasting grey and red colours with sufficient lighting. The visual appearance of the interpreter (e.g., choice of clothing and dress accessories) should not cause undue distraction to the viewer.

## **Employment and Remuneration of Sign Language Interpreters**

- The Sign Language Interpreters should be full time employees and not part time employees.
- Broadcasters should employ a minimum of 2 Sign Language Interpreters.

## **Inclusion of Sign Language Interpretation on all programmes of national importance**

Sign Language should not only be in the news broadcasts but also in other programmes of national importance.

## **Subtitles**

Subtitles must be in a size and font that is readable. 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.

## **9.0 COMPLYING WITH THESE GUIDELINES**

In evaluating and measuring performance against these guidelines, the Commission may undertake some or all of the following activities: -

- i. Request reports from broadcasters every six months in respect of the programmes that have been broadcast with accessible content.
- ii. Assess programme content for compliance with the guidelines for television access for the provision of subtitling, Sign Language and audio description and to cross-check broadcaster reports provided against output.
- iii. Seek feedback from the Users and other stakeholders.
- iv. Meet with broadcasters on a regular basis to discuss performance against the guidelines having had regard to reports provided and the outcomes of monitoring.
- v. Produce a report annually detailing compliance by broadcasters with the guidelines.
- vi. Take Compliance and Enforcement actions in instances of apparent non-compliance with the guidelines.

In addition to the above, the Commission reserves the right to review and amend this approach or apply other appropriate mechanisms in assessing performance as required. Audience members who are unhappy with compliance by broadcasters with the guidelines should address their concerns in the first instance to the relevant broadcaster if they are dissatisfied with the way a broadcaster is complying with the guidelines. If audience members are not satisfied with the response provided by the broadcaster, then they may refer the matter to the Commission.