



**Subtitle it!**

Whatever we watch  
However we watch it

**Progress on pause**

**Spelling out the  
case for subtitles on  
on-demand services**



**ACTION ON  
HEARING  
LOSS**

# Introduction

The way we watch TV has changed dramatically over recent years. We no longer need to rush home to watch our favourite programme on TV because we can catch-up on a range of services through a whole host of devices — whether that's on our mobile phone during our commute, in bed with our tablet or on our smart 'connected' TV.

'On-demand' TV and film services are more popular than ever before. According to Ofcom, the number of UK households subscribing to the top subscription video-on-demand services increased from 4.2 million to six million in the 12 months to March 2015<sup>1</sup>. Forecasts predict that revenue from video streaming subscriptions will reach more than £1.1bn within the next five years — more than double the revenue generated in 2014<sup>2</sup>.

But, despite there being 7.5m subtitle users in the UK<sup>3</sup>, unlike on traditional (linear) TV, there's nothing obliging broadcasters or TV platforms to offer subtitles on these on-demand services — and most don't.

We wanted to understand the needs of people who rely on subtitles and their experiences of using on-demand services. During summer 2015, 3,751 people with hearing loss completed an online survey to help us find out how much they watch on-demand content and what the barriers are, (if any), that stop them from watching.

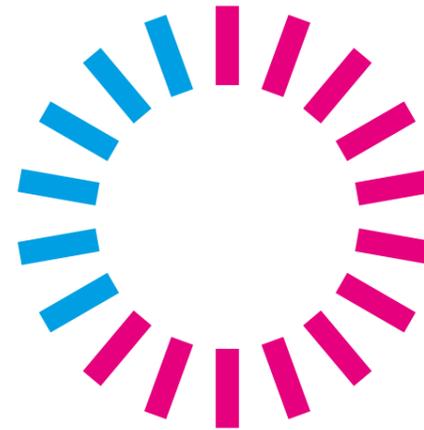
## What is on-demand?

On-demand is video content such as a TV programme, series or film that you can access at any time of your choosing. It's also referred to as video on demand or VOD. On-demand includes catch up TV, where a TV show is available for a period of days after the original broadcast (for example, on ITV Player or the BBC iPlayer). You can watch on-demand content through a variety of services, such as through a set top box (for example, Sky, Virgin, Apple TV), online (for example, BBC iPlayer, Netflix, Amazon), through your mobile phone or games console. On-demand does not include programmes recorded from live TV and watched at a later date, or those on +1 channels.

## The key findings

Based on the 3,751 people who completed our survey, a huge proportion of people with hearing loss rely on subtitles to watch TV — and they face a dramatic level of exclusion when they attempt to use on-demand television and film services.

**89% of people with hearing loss rely on subtitles to watch TV at least some of the time.**



## Nearly two thirds

of respondents (63%) watch on-demand content at least once a week.

**87% of people with hearing loss have started to watch a programme on-demand and found that it had no subtitles.**

Customers with hearing loss place a high level of importance on accessibility when it comes to making decisions about subscribing to services.

**More than two thirds (69%) of those who pay for subscriptions agreed that they would switch TV service providers if they knew they could have access to more subtitled content.**

People with hearing loss are tired of waiting for providers to open up their content and want the government to act now to ensure that they are not digitally excluded.

**Nine out of ten people with hearing loss think that the government should regulate to ensure that subtitles are available for on-demand services.**

## Our recommendations

A lack of subtitles on on-demand services is leading to the digital exclusion of people with hearing loss living in the UK, and the government and broadcasters need to take urgent action.

1. The government should legislate to ensure that on-demand service providers are compelled to provide minimum levels of access services on their content, in line with existing regulation around linear TV.
2. Providers of on-demand services should invest to increase the provision of access services across different platforms.

## What are access services?

TV access services are additional facilities supplied by broadcasters that are designed to allow consumers with hearing and sight loss to gain access to TV content.

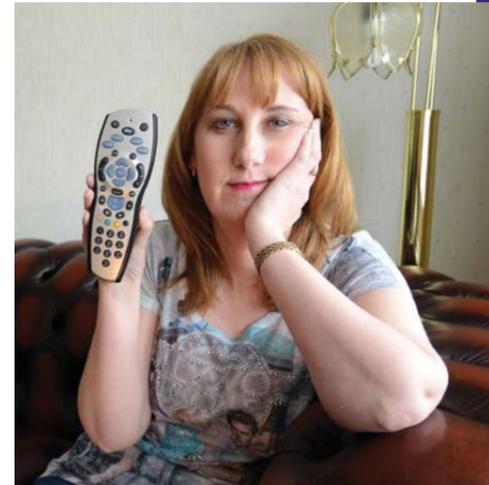
The three access services are subtitling, audio description and signing.

# On-demand subtitles — what's the problem?

The 2003 Communications Act provides a legal framework for the provision of subtitles on traditional, or linear, television. There is no such legal requirement for subtitles for on-demand content. This means that many services don't offer subtitles, or provide very few. The regulator for on-demand services, ATVOD, recently found 80% of the UK on-demand services that it regulates have no subtitles<sup>4</sup>. In addition, ATVOD found:

- 85% don't offer subtitles on website apps
- 93% don't provide subtitles on mobile or tablet apps
- Only 3% of providers offer subtitles for VOD on other devices, such as connected TVs or games consoles

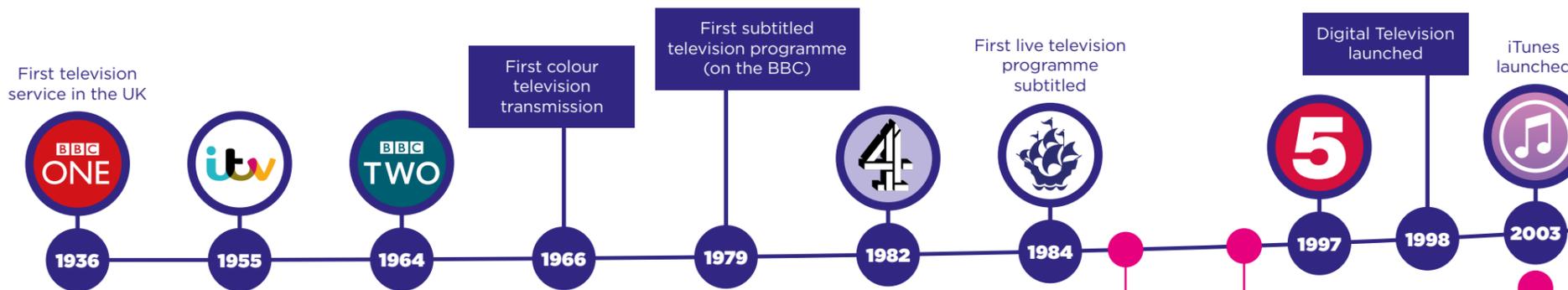
The last time legislation was passed relating to subtitles was in 2003 — and the world has moved on. It's now time for legislation to catch up.



“When I was 10, our first Teletext TV opened up a whole new world to me! Progress was slow but I remember the excitement that came with the first subtitled Grange Hill, Blue Peter, Neighbours, Coronation Street, Wimbledon, World Cup football, Olympics and more! Now, thanks to legislation our five previously terrestrial channels are just about 100% subtitled.

“But the way that we view TV is changing. More and more companies are expanding into the on-demand market; and if the current trend for no subtitles continues, there's a danger that deaf people will be left behind.”

**Michelle, Northumberland**



**Broadcasting Acts 1990, 1996**  
**Communications Act 2003**  
 These Acts brought in a legal requirement for UK broadcasters to provide subtitles for the first time. An increasing number of channels were brought under the legislation, as well as a requirement to provide signing and audio description.



**Audiovisual Media Services Regulations 2009**  
 The regulator, the Authority for Television on Demand (ATVOD), was given responsibility to encourage, but not to demand or require, providers of on-demand programme services to ensure that their services are progressively made more accessible to people with hearing and sight loss.

# Subtitle it! survey findings

This report draws on the findings of the Subtitle it! survey carried out between June and July 2015 across the whole of the UK. The aim of the survey was to find out the views and experiences of people with hearing loss when watching programmes on-demand. Overall, 3,751 people with hearing loss took part in the survey.

## Who took the survey?

Respondents are older than the general population, with more than two thirds aged 55 and above. This is not surprising, given that the prevalence of hearing loss in the UK increases with age, with more than 40% of people aged 50 and over having some level of hearing loss, rising to 70% of people aged 70 and over<sup>5</sup>.



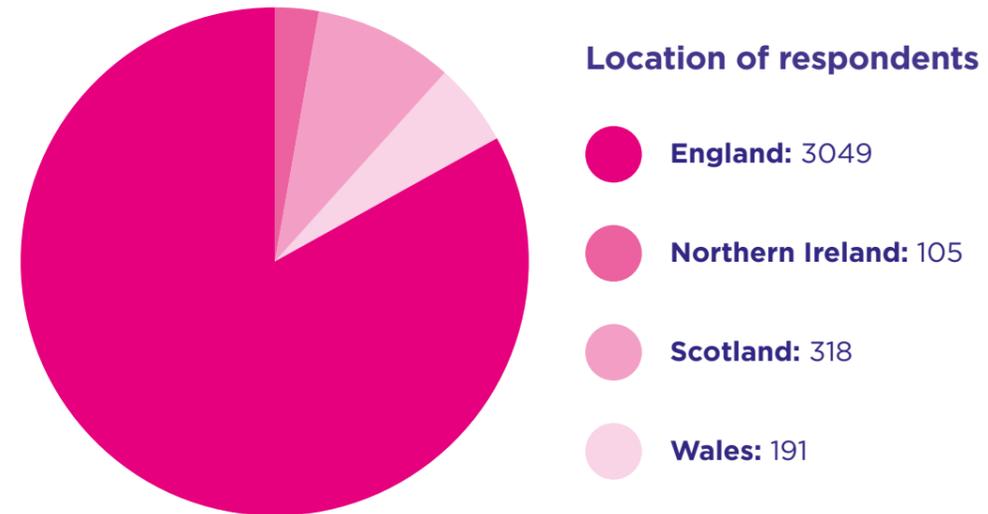
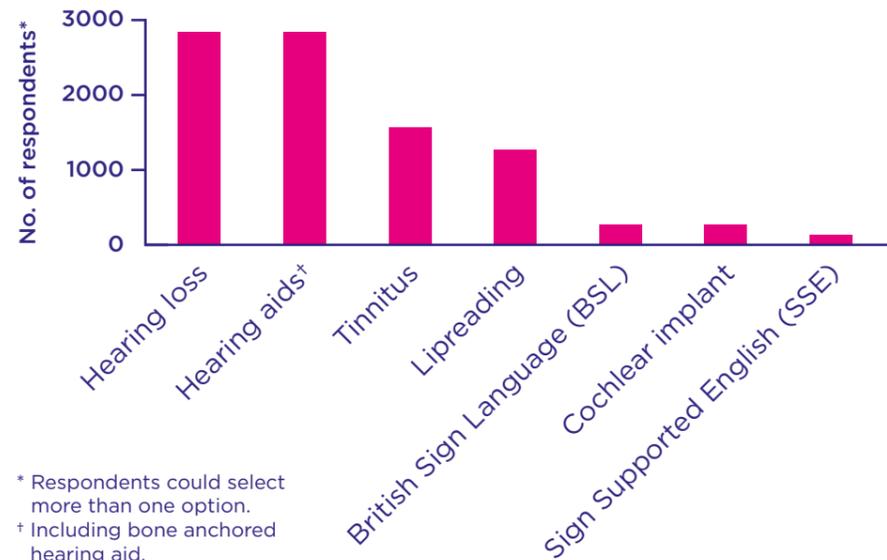
“I like to watch things on people’s recommendation, so on-demand is perfect for me. But I’m really restricted by the lack of subtitles. I downloaded the 4OD app to my Android tablet but I haven’t found anything I want to watch that has subtitles — and I really love their programmes.

“I’m always a little embarrassed when I’m round someone else’s house and there’s a big fuff about subtitles and having to chop and change what we watch around me. Also, when travelling, my boyfriend can download anything he wants and watch it. I have absolutely no way of doing that.

I feel as though access should be automatic. Why shouldn’t I have the same access to shows that everyone else has? Why is it tacked on to the end of a process as a ‘might do this in the future’? This really upsets and annoys me.”

**Helen, Manchester**

## Hearing loss and communication needs of respondents



## Who took the survey?

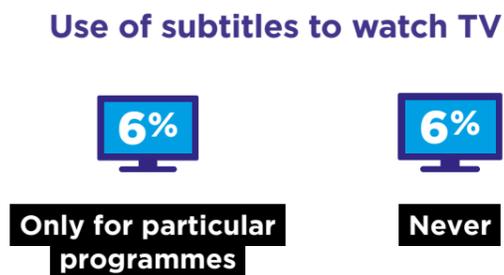
# Why are on-demand subtitles important to viewers?

Our survey found that more than 89% of people with hearing loss rely on subtitles to watch TV at least some of the time. Subtitles offer more than a technical solution to a practical problem; they connect people, too – to their friends, to their family, and to the world of film and TV.

Without subtitles, trying to enjoy a simple night in with family or friends to watch the latest box set or film release can be isolating. And having a conversation about the latest show that everyone else is talking about becomes impossible.

**With the prediction that, by 2019, video will make up 80% of all internet traffic<sup>6</sup>, subtitles have never been more important.**

- 89% of people with hearing loss rely on subtitles to watch TV at least some of the time.
- The majority of respondents, nearly four fifths (78%), feel subtitles are important to them and their family.
- Of those who said they never watch on-demand content, nearly two fifths (38%) said this was because subtitles are not available.
- Over two thirds of respondents (68%), watch TV with at least one other person.
- 71% of people with hearing loss said they feel they've missed out on, or been left out of, conversations with their friends or family because of a lack of subtitles on on-demand services.



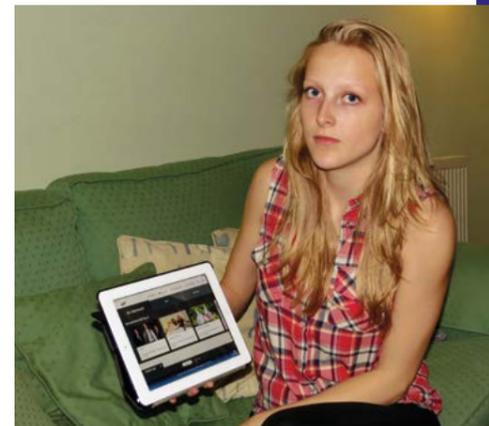
3643 respondents



“I was at my dad’s just last weekend and my little brothers wanted to watch a movie that was on NOW TV.

“I braced myself for no subtitles, as I knew there wouldn’t be any, and I was right. My dad was getting annoyed because he couldn’t work out why, and my little brothers didn’t know what was going on. So we continued to watch the film and I just played on my iPad and didn’t watch the movie. This meant I missed out on having fun with my two little brothers and it was quite upsetting.”

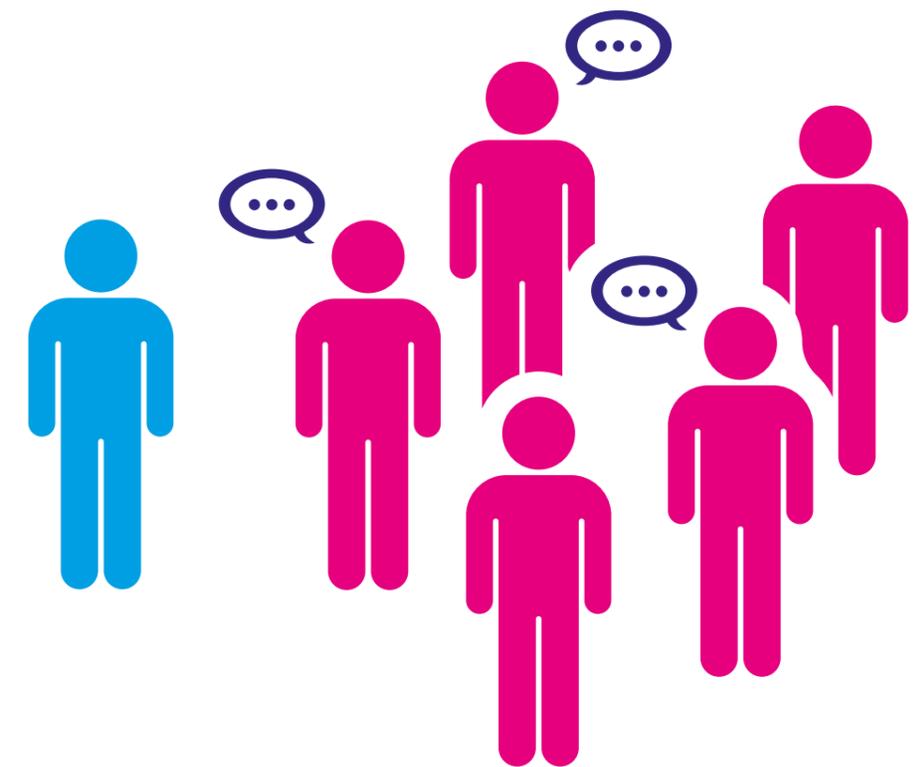
**Jamie, Newcastle-Upon-Tyne**



“TV is a good way to relax after school work, but I can’t understand it without subtitles. The lack of subtitles on on-demand programmes means I can’t catch up on things I missed when they were on TV. This makes me feel like the odd one out, especially when my friends say, ‘Did you watch such and such film?’, and I have to say, ‘No, I didn’t.’”

**Ellen, Norfolk**

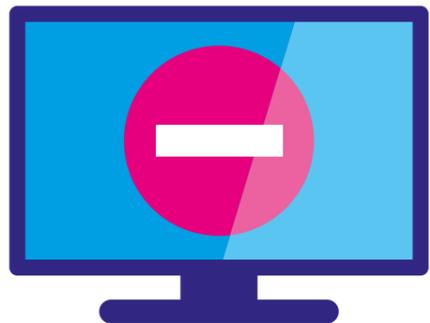
**71%** of people with hearing loss feel they have missed out on, or have been left out of, conversations with friends or family because of a lack of subtitles.



# Why subtitles should matter to on-demand providers



**87%** of people with hearing loss have started to watch a programme on-demand and found that it had no subtitles.



**83%** have missed out on a programme, film or series altogether, due to a lack of subtitles.

Our survey tells us that 87% of people with hearing loss have started to watch a programme on-demand and found that it had no subtitles. Simply put, without subtitles, people with hearing loss can't watch or engage with content — whether that's via their smart TV, a tablet or a mobile app.

With 10m people with hearing loss in the UK, providers who don't offer subtitles on their on-demand services risk excluding — not to mention angering — one in six of the population.

Research shows that subtitles are very much in demand by customers — the BBC has revealed that every single day more than 500,000 programmes are viewed on iPlayer with the subtitles switched on<sup>7</sup>.

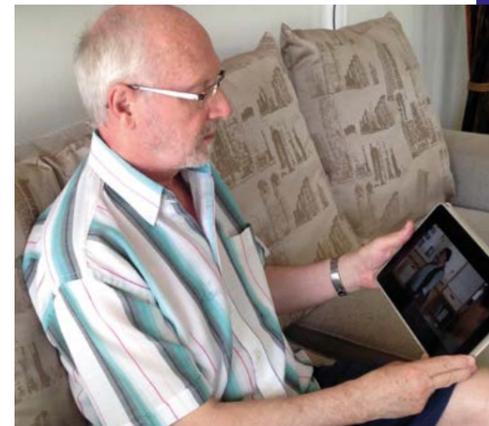
- 87% of people with hearing loss have started to watch a programme on-demand and found that it had no subtitles.
- 83% have missed out on an on-demand programme, film or series altogether, due to a lack of subtitles.
- Of those who said they don't watch on-demand content, more than a third (38%), said this was because subtitles are not available.
- 71% of respondents don't think subtitles are available for all of the on-demand content they want to watch.
- The most popular programmes to watch on-demand are drama programmes, selected by 78% of respondents, followed by films (58%). Also popular were factual programmes (55%), entertainment (51%), comedy (38%) and news and current affairs (36%).



“When I subscribed to BT, I was looking forward to watching films with subtitles. But I later discovered that on-demand films don't have any subtitles when watched through BT's YouView.

So, despite subscribing to BT, I still have to rent DVDs by post — because it's the only way I can watch films!”

**Graham, London**



“I downloaded an episode from the 2015 series of ITV's Vera to watch on iTunes. This was subtitled when it was originally on TV, but the iTunes version had no subtitles.

I find this really strange, as the hard work in subtitling has surely already been done?”

**Roger, Leeds**



“BBC iPlayer usually has good subtitles, but UK Netflix has very few subtitles.

In fact, I've had to change my IP address to access US Netflix because they have more subtitles and you can search by subtitles.”

**Sarah, Waltham Abbey**

# A business case for subtitles

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10m people in the UK<sup>8</sup>, and 360m people worldwide<sup>9</sup>, have hearing loss. More than 42% are over 50<sup>10</sup>, an age group which, in 2014, accounted for more than three quarters of the nation's wealth<sup>11</sup>.

In an increasingly crowded on-demand marketplace, differentiating your service on the basis of accessibility makes good business sense.

Our survey found that more than half of consumers with hearing loss, not currently paying for any on-demand subscription service, would consider signing up if they knew the service had subtitles.

- Of those who do not pay a subscription, more than half (54%), would consider paying for a subscription if they knew the on-demand service had subtitles.
- More than two thirds (69%) of those who pay for subscriptions agreed that they would switch TV service providers if they knew they could have access to more on-demand content with subtitles.

## Levels of satisfaction with services are low due to a lack of subtitled content.

- Just under three quarters (73%) of those who pay for subscriptions agreed that they're paying for a service that they can't take full advantage of because of their hearing loss.
- 72% of those who pay for subscriptions have paid for on-demand content that they haven't been able to watch due to a lack of subtitles.
- 64% of those who pay for subscriptions feel they're being overcharged by their subscription service due to a lack of subtitles.
- Less than a quarter (23%) of those who pay for subscriptions agreed they receive good value for money from their on-demand supplier.

## More than two thirds

of those who pay for subscriptions (69%) agreed that they would switch TV service providers if they knew they could have access to more subtitled content.

## 54%

of those who do not currently pay a subscription would consider paying for a service if they knew subtitles were available.

Amazon began rolling out subtitles in December 2014 and now has subtitles on nearly 70% of its streamed content, with 100% of the top 200 titles subtitled. The company aims to achieve 100% subtitles on all its content in the near future.

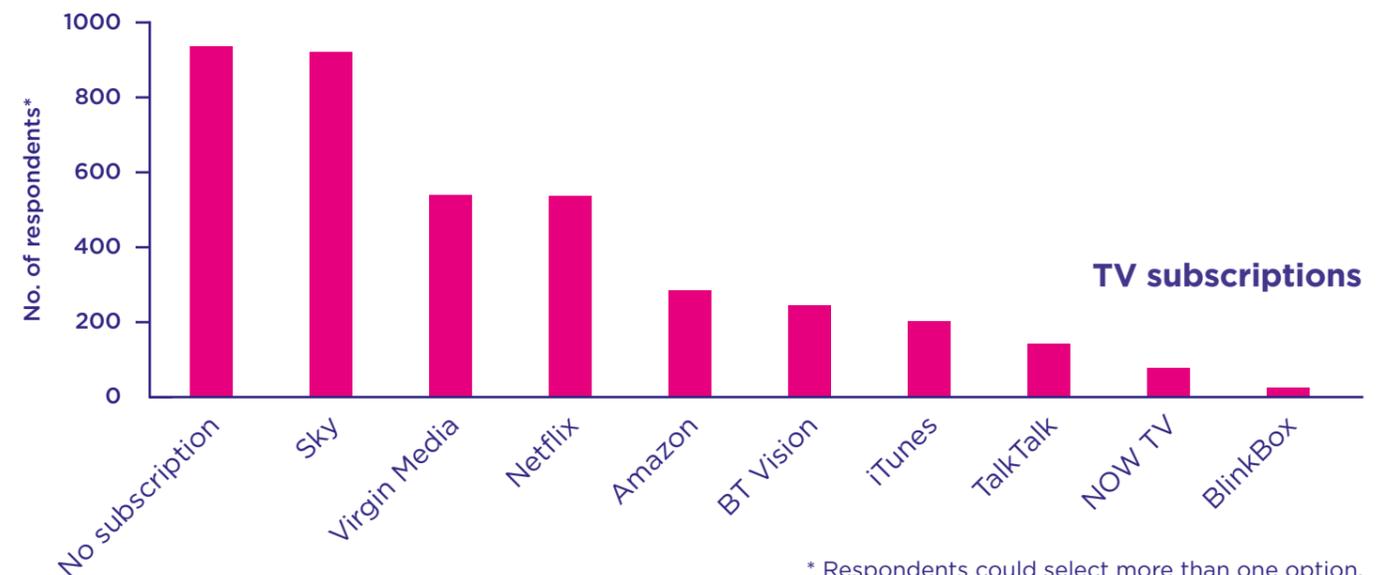
Amazon customer, Stephanie McDermid, is delighted by this development and said, **"I know it seems a pretty minor thing in the scheme of things, but I can't explain how lovely it is to be able to sit and watch a movie on Amazon."**



**"Recently, I tried to watch the film, *Birdman*, with my wife, through Virgin Tivo on-demand films. Some of my friends told me that they'd seen it at the cinema and it was a brilliant film. So I ordered it from Virgin on-demand and paid for it in advance. There was no information when I ordered that it would not have subtitles.**

**My wife and I were really looking forward to watching it but, when the film started, immediately we noticed that there were no subtitles. I felt really frustrated and disappointed that I couldn't watch this film with my wife."**

**Richard, Essex**



\* Respondents could select more than one option.

# Why do we need new legislation?

The way we watch television content has been transformed in ways in which Parliament couldn't foresee when it passed the 2003 Communications Act.

The Communications Act set clear guidelines for the provision of subtitles on traditional TV and has led to huge improvements in the provision of access services.

However, the legislation is 12 years old and regulates the technology that existed at the time: it still retains references to Teletext, which was switched off in 2009. It could not foresee the development of TV and, therefore, makes no reference to streaming, on-demand or catch-up services.

**Technology has outgrown the legislation. Parliament gave people with hearing loss access to television services; but this has now been taken away.**

In 2009, the then government introduced the 'The Audiovisual Media Services Regulations 2009', which gave ATVOD (the Authority for Television on Demand) the remit to "encourage" on-demand providers to make their services more accessible.

These regulations, however, give ATVOD no power to compel broadcasters and other on-demand providers to provide access services. This self-regulation has been in place for six years — a reasonable timeframe to have expected the industry to make progress voluntarily.

We know that the technology can be made to work and that subtitles can be compatible across providers, platforms and devices. The BBC has 98% accessibility across over 1500 devices, proving that it can be done if providers have the will.

However, as outlined earlier, people with hearing loss are still being largely excluded from new ways of watching TV. Therefore, the current approach of allowing the industry to self-regulate access services for on-demand has failed, and legislation is now required.

We're calling for legislation that replicates the model used by OFCOM for linear TV; meaning that legislation is unlikely to place onerous obligations on small, or new, entrants to the market. Under the code for linear television, the amount of content required to be subtitled depends on a combination of market share and the length of time the broadcaster has operated.

## Our recommendations

1. The government should legislate to ensure that on-demand service providers are compelled to provide minimum levels of access services on their content, in line with existing regulation around linear TV.
2. Providers of on-demand services should invest to increase the provision of access services across different platforms.



**Four out of five** people (82%) with hearing loss agreed that they feel discriminated against due to a lack of subtitles on video-on-demand.



**Nine out of ten** respondents (91%) agreed that the government needs to regulate to ensure that subtitles are available for on-demand services.



**For more information about the Subtitle it! campaign, please contact us:**

[www.actiononhearingloss.org.uk/SubtitleIt](http://www.actiononhearingloss.org.uk/SubtitleIt)  
[campaigns@hearingloss.org.uk](mailto:campaigns@hearingloss.org.uk)

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**We're the charity taking action on hearing loss since 1911.  
We can't do this without your help.**

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**For help, support and advice on age related hearing loss go to [hearingcheck.org.uk](http://hearingcheck.org.uk)**

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Textphone 0808 808 9000  
Email [information@hearingloss.org.uk](mailto:information@hearingloss.org.uk)**

**ACTION ON  
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