

Accessibility

Standards Policy

V1.1



Executive Summary

We have established this policy to define the level of accessibility we will provide for our consumers and colleagues.

Our technology and facilities must work for everyone. The principles of inclusive design will guide us. Inclusive design supports the widest possible range of situations. It does not need adaptation for accessibility.

We will make no assumptions about our **consumers**. Where they provide clarity, we will adopt international standards. We will follow the Web Content Accessibility Guidelines (WCAG) 2.1 standard. Our lowest level of conformance will be AA. We will aspire to AAA conformance wherever it is viable.

Our content-based services must meet all Ofcom or similar access services regulations. Where possible, we will aim higher. We will always seek to reflect best practice in these markets.

We will give our **colleagues** easy access to the information, systems and infrastructure they need to do their work. We will ensure there are no barriers to employing people with specific accessibility needs. We will take positive action to comply with all legal accessibility regulations and standards. Products and services for our colleagues will meet the same standards as those intended for our consumers.

Where we cannot meet our policy, we will require dispensations or remediation plans. We will track these exceptions. We will expect continuous improvement, even where it is challenging.

Introduction

ITV is for everyone, regardless of their background, race, disability, sexuality, gender identity or expression.

We will:-

- Embed the principles of inclusive design
 - into the way we build and develop products and services and
 - into how we make changes that affect our viewers and colleagues.We'll do this through training and standards.
- Influence our suppliers. We only want to work with organisations that share our commitment to inclusion. This will ensure we can make an impact.
- Listen to our viewers, our colleagues and other relevant stakeholders to find out how we can improve what we do. They will tell us what else we can do to make our products and services more accessible and easy to use.

From 2020 we will design for difference; we will design for everyone. We will develop a suite of accessible products and services for all of our viewers.

We will not seek solely to meet the needs of disabled viewers and customers. We know that everyone benefits from new ideas and inclusive designs.

ITV will seek to ensure that its programmes are as accessible as possible for all viewers. As always, ITV will seek to meet all its access service commitments to provide subtitling, signing and audio description.

All user interfaces and content created by ITV or procured by ITV from an external agency should follow this policy. This will ensure information is as accessible and inclusive as possible.

Digital content created according to this policy will be compatible with assistive technology. As a result, users with a disability will have the best chance to access the information they need.

It will also meet the needs of those with disabilities who do not use assistive technology. These users also need content presented with their specific needs in mind.

If you have any questions or comments on this policy, please contact us at accessibility@itv.com.

Accessibility policy fundamentals

About disability

Disability happens at the points of interaction between a person and society. The **social model of disability** has been developed by disabled people, and states that people are disabled by barriers in society rather than their impairment or difference. These barriers can be physical, like buildings not having accessible toilets. Or they can be caused by people's attitudes to difference, like assuming disabled people can't do certain things.

Barriers can be permanent, but they can also be temporary (a short term injury) or situational (commuting, driving). Most of us experience situational disability every day of our lives. At least 20% of the UK's population can be categorised as permanently disabled.

Physical, cognitive, and social exclusion are the results of barriers that are not addressed by accessible solutions.

Ensuring products, services and sites are accessible redresses this mismatch. **Inclusive Design** is an approach that enables and draws on the full range of human diversity. Inclusive Design helps us to deliver accessibility so that everyone is included. Auxiliary aids and services such as subtitling, sign language translation and audio description also contribute to our accessibility.

Policy scope

This document sets out ITV's policy on inclusive design and accessibility provisions. This policy will ensure that ITV provides an equal experience for customers and colleagues alike. It does not seek to provide detailed guidance for programme production. It does contain guidance for creating accessible internal content.

Standards adherence

We will take positive action to comply with all legal accessibility regulations and standards. ITV will follow Ofcom and other relevant legal regulations. Where feasible, ITV will aspire to reflect the best of industry practice. ITV will look to achieve:-

- 100% Subtitling on all linear TV channels and Video On Demand (VOD) services.
- 20% Audio description on all linear TV channels and VOD services.
- 5% Sign Language Translation on all linear TV channels and VOD services.

ITV will follow the [Web Content Accessibility Guidelines \(WCAG\), version 2.1](#). Our lowest level of conformance will be **AA**. We will aspire to **AAA** conformance wherever it is viable. There will be certain domain-relevant exceptions. Exceptions outside this will require a dispensation or remediation plan.

Our technology and facilities must work for everyone. New technology and facilities will be delivered according to the Accessible Procurement Policy. Facilities will be accessible to the broadest range of users possible.

We will give our colleagues easy access to the information and infrastructure they need to do their work. Technology will enable all colleagues to perform their work to the best of their abilities. We will ensure there are no barriers to employing people with specific access needs.

Implementation, dispensation, remediation, feedback and review

Those most affected by this policy must be engaged in its **implementation**. We will consult with internal and external stakeholders, such as the ITV Able network and relevant charities. We will engage with these groups for feedback and guidance.

We understand that ITV has a considerable legacy technology platform and many facilities. It will not be viable, or desirable, to enforce policy compliance consistently.

- Where we agree that change is not viable or desirable, we will grant a **dispensation**. We will track and review these dispensations annually.
- Where we cannot deliver change swiftly, we will agree a **remediation** plan. We will track and review these plans annually.

Consumers and colleagues can contact or give **feedback** to the Accessibility Team via accessibility@itv.com. They can escalate a lack of compliance, make a suggestion or raise a query about the policy itself. The team will respond within 5 working days.

We will **review** this policy document annually.

ITV Persona Spectrum

We have developed the ITV Persona Spectrum to bring the Accessibility stakeholders to life.

We expect colleagues to utilise these personae within the development or procurement of user interfaces.

Our testing and quality control processes will reflect the needs of these personae within user journeys or equivalents.

Impairment	Situational	Temporary	Permanent	ITV Personas
Touch	Commuter	Arm injury	One arm	Commuter Arthritic Person
Sight	Cooking in kitchen	Cataract	Blind Partially Sighted Colourblind	Blind Person Partially Sighted Person Colourblind Person
Hearing	Exercising at the Gym	Ear infection	Deaf	Hard of hearing Person BSL Native User
Speech	Heavy accent	Sore throat	Non-verbal Second Language	First generation immigrant
Mental / cognitive	Multitasking	Migraine	Autism / Aspergers Dyslexia Poor reading skills	Dyslexic Person

Appendix A - Interface Accessibility

- **All our interfaces shall aim to meet WCAG 2.1 AAA standards¹**, utilising testing procedures as agreed with the Accessibility team. Features that cannot reach this standard **must meet at least AA standard**. We will require such features to have a dispensation and preferably a remediation plan. Key exceptions are noted below.
 - Regarding Success Criteria (SC) 1.2 - Time-based Media
 - SCs 1.2.3, 1.2.4, 1.2.5, 1.2.6 - Time based Media, where Subtitling, Audio Description and Sign Language Translation are mandated for all content in the AAA standard. We have modified these requirements by the volumes quoted below.
 - SC 1.2.7 - (Extended Audio Description); this will not be a requirement.
 - SC 1.2.8 - (Media Alternative); this will not be a requirement.
 - Regarding SC 1.4.7 - (Background Audio); this will not be a requirement.
 - Regarding SC 3.1 - (Readable content) some level of deviation may be permitted, particularly SCs 3.1.3 (Unusual words), 3.1.4 (Abbreviations) and 3.1.6 (Pronunciation), but ideally we should explain abbreviations and unusual words at least once in every document or article.
 - Regarding SC 3.3.5 (Context sensitive help) - this will not be a full requirement. Some form of help section should be accessible from all pages / states, but need not be context-sensitive.
 - Media created to assist users in the operation of interfaces will be subtitled. Where longevity of content and a wide user base can be expected, we will produce sign language translated versions. The media should be produced so as not to need Audio Description.
- All text created for our interfaces shall be produced with an assumed reading age of 14 or UK academic year 10².
- All our interfaces shall use Plain English. A detailed definition can be found at [How to write plain English](#); a relevant summary is presented here:-
 - Keep sentences short - no more than 15-20 words.
 - Prefer active verbs - aim to make at least 80% of verbs active rather than passive.
 - Use 'you' and 'we'.
 - Use words that are appropriate for the reader. Avoid jargon and explain specialist terms or abbreviations at least once.
 - Don't be afraid to give instructions; it makes content punchy and easy to understand.

¹ <https://www.w3.org/TR/WCAG21/>

² Testing can be performed using the [Hemingway App](#), aiming for a Grade 9 score. This approach will ensure you write succinctly and avoid confusing your readers.

- Our interfaces shall have, from point of launch
 - A logical structure and reading order, navigable via assistive technology.
 - Fonts and font sizes that assist visually impaired users, and support user configuration.
 - High levels of contrast between all areas of text and their backgrounds.
 - Alternative text labels for any imagery used. Backgrounds should be marked such that screen readers ignore them.
 - Meaningful text describing any links (avoid 'click here'); indicate content of link - e.g. 'our accessibility guidelines').

Appendix B - Content Accessibility

Linear broadcast television

Subtitling

- **We will provide subtitling for 100% of programmes on all broadcast channels.**
- We will aim to subtitle all prime-time promotions and pre-recorded interstitial materials.
- We will ensure all commercial spots for broadcast during prime-time are supplied with subtitles. Spots not supplied with subtitling will be subtitled by ITV's Access Services team at the advertiser's expense.
- We will provide live subtitling with a minimum accuracy of 98% using the NER model and a maximum delay of 8 seconds. We will focus on improving accuracy and latency of live subtitling where feasible. We will achieve this with the engagement of the relevant production teams.
- Pre-recorded subtitling will be provided with a minimum time between errors of 20 minutes.
- We will ensure late-delivered programmes are not subtitled live. We will work to find a reliable, rapid pre-recorded alternative.

Audio Description

- We will provide Audio Description on those programmes of most benefit to the blind and sight impaired.
- We will take advice from the stakeholder agencies to guide programme selection.
- We will provide **Audio Description** for
 - **20%** of programmes on **ITV1 and ITVBe,**
 - **40%** of programmes on **ITV2, ITV3 and ITV4,**
 - **30%** of programmes on **CITV.**
- We will aim to describe or make accessible via audio-only all promotions and interstitials for transmission in prime-time. Ideally, we will ensure they are created in a naturally accessible form.
- Our Production and Access Services teams will co-operate and ensure that programmes are described on first broadcast.
- We will develop companion on demand Description services. These will broaden the appeal and comprehension of content for those with vision impairment.
- We will develop live Description services for major broadcast events.

Sign Language Translation

- We will show a broad range of Sign Language Translated programmes in consistent time slots.

- We will take advice from the stakeholder agencies to guide programme selection.
- **We will provide Sign Language Translation for at least 5% of programmes on all broadcast channels.**

External Video On Demand services

Includes all platforms containing video.

We will ensure that all pre-recorded programmes that have been transmitted with subtitles or audio description will carry these services online.

Subtitling

- **We will subtitle 100% of content.** This includes both live and pre-recorded material. Short duration short-form content may be given a dispensation under certain circumstances.
- We will require the introduction of Subtitling capability on all platforms by the end of 2021. This will include both live simulcast and VOD assets. We will deliver this by a gradual rollout between Q4 2020 and Q4 2021.
- We will introduce a Subtitling capability on all new platforms launched. We will deliver this at time of launch.
- We will set Subtitling accuracy targets that mirror those for Linear broadcast.

Audio Description

- We will provide Audio Description on programmes and content of most benefit to the blind and sight impaired.
- Where necessary, we will take advice from the stakeholder agencies to guide selection.
- We will take advice from the stakeholder agencies to guide programme selection.
- **We will provide Audio Description for 30% of pre-recorded long-form content.**
- We will require the introduction of Audio Description capability on all platforms by the end of 2022. This will include live simulcast and VOD assets. We will deliver this by a gradual rollout between Q4 2020 and Q4 2022.
- We will introduce an Audio Description capability on all new platforms launched. We will deliver this at time of launch.

Sign Language Translation

- We will show a broad range of Sign Language Translated programmes.
- Where necessary, we will take advice from the stakeholder agencies to guide programme selection.
- **We will provide Sign Language Translation for 5% of pre-recorded long-form content.**
- We will require a Sign Language Translation capability be present on all new platforms launched. We will deliver this at time of launch.

Internal Video on Demand / Audio-visual assets

- **We will provide Subtitling for all internal assets prior to publication.**
- We will set a target of **Audio Describing** or voicing all internal assets within 24 hours of publication, provided the following are true:-
 - The content contains significant quantities of text-based data,
 - The content contains image-intensive material with significant meaning.
- We will provide **Sign Language Translated** versions of certain major announcements. We expect this will be provided within 3 days of publication.
- We will provide alternative transcriptions where platforms support the functionality.

Communications documents (including email newsletters)

- **All our documents or interfaces shall aim to meet WCAG 2.1 AAA standards³**, utilising testing procedures as agreed with the Accessibility team. Features that cannot reach this standard must at least meet AA standard. We will require them to have a dispensation and preferably a remediation plan.
- All our documents shall be produced with an assumed reading age of 14. Testing can be performed using the [Hemingway App](#). This approach will ensure you write succinctly and avoid confusing your readers.
- All our documents shall use Plain English. A detailed definition can be found at [How to write plain English](#); a summary is presented below:-
 - Keep sentences short - no more than 15-20 words.
 - Prefer active verbs - aim to make at least 80% of verbs active rather than passive.
 - Use 'you' and 'we'.
 - Use words that are appropriate for the reader; avoid jargon and explain specialist terms. This is very important if you are creating content that's read widely across ITV.
 - Don't be afraid to give instructions; it makes content punchy and easy to understand.
 - Avoid nominalizations - they are formed from verbs (e.g. completion from complete), and can make writing very dull and heavy-going.
 - Use simple lists where appropriate.
- Our documents shall have, from point of publication
 - A logical structure and reading order, navigable via assistive technology.
 - Fonts and font sizes that assist visually impaired users, and support user configuration.
 - High levels of contrast between all areas of text and their backgrounds.
 - Alternative text labels for any imagery used. Backgrounds should be marked such that screen readers ignore them.
 - Meaningful text describing any links (avoid '[click here](#)'; indicate content of link - e.g. '[our accessibility guidelines](#)').
- We will provide narrated versions where this can assist our colleagues.

³ <https://www.w3.org/TR/WCAG21/>

Further Reading

Style Guides and Design Systems

Readability guidelines - <https://readabilityguidelines.co.uk/>

BBC Web Style Guide - <https://www.bbc.co.uk/gel>

Gov.UK Style Guide - <https://design-system.service.gov.uk/styles/>

Gov.uk service standards - <https://www.gov.uk/service-manual/service-standard>

Gov.uk accessibility standard - <https://www.gov.uk/service-manual/service-standard/point-5-make-sure-everyone-can-use-the-service>

NHS Design System - <https://service-manual.nhs.uk/design-system>

International Standards

WCAG 2.1 - <https://www.w3.org/TR/WCAG21/>

WCAG Table guidance - <https://www.w3.org/WAI/tutorials/tables/>

Useful Tools

Web Accessibility Initiative - W3C's Accessibility resource centre <https://www.w3.org/WAI/>

WebAIM WAVE (automated testing tool) - <https://wave.webaim.org/extension/>

NoCoffee Vision simulator -

<https://chrome.google.com/webstore/detail/nocoffee/jjeeggmbnhckmgdhmgdckeigabjfbddl>

HighContrast contrast simulator - <https://chrome.google.com/webstore/detail/high-contrast/djcfdncoelnbljdjfhinnjldjlikmph>

NVDA Screenreader tool - <https://www.nvaccess.org/>

Chromevox Screenreader tool - <https://chrome.google.com/webstore/detail/chromevox-classic-extensi/kgejglhpjiefppelpmljglcjbhoiplfn>

Hemingway App - text analysis tool - <http://www.hemingwayapp.com/>