

Accessible content for all: Accessibility in Australian Screen Media

White Paper

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About Attitude Foundation

The Reason

“The biggest challenge for Australia is to provide an environment for change which allows for a cultural shift across all parts of our society. Active participation of those with disability in society generally can only occur with a change in attitude. This is something that can't be legislated; people need to see the reason why change is important.” - Disability Expectations: Investing in a better life, a stronger Australia, PWC, November 2011

Community attitudes can slow change. We believe that media is a powerful tool for changing attitudes. Attitude Foundation explores how people with disability are portrayed in the media and is working to ensure that there are more realistic inclusions of people with disability across all forms of media.

We want to improve Australia's understanding of disability and we strive to challenge three common misconceptions:

- That people with disability are only objects of inspiration, pity or tragedy.
- That an individual's diagnosis or impairment is the barrier to their participation in society and instead promote the Social Model of Disability which recognises that everyone is different, and that society needs to be modified to ensure all people can participate equally.
- That all impairments have obvious physical characteristics when in fact; the majority of impairments are invisible e.g. psychosocial or mental health conditions, intellectual or sensory impairments and hearing and vision impairments.

The Vision

To live in an Australia in which people with disability are welcomed and fully included on an equal basis in every aspect of life.

Problem Statement

Australians' access to affordable screen media content, particularly film and television, has seen a rapid increase throughout the last decade. The popularity of traditional broadcast media has been usurped by streamable, accessible and convenient content that requires little more than a stable internet connection and a compatible digital device. In 2015, ad-supported video-on-demand platforms (AVoD) and broadcaster video-on-demand (BVoD) services in Australia were accompanied by subscription video-on-demand (SVoD) services, and since that time the Australian media landscape has been permanently and fundamentally transformed.

AVoD, BVoD and SVoD services have seen significant increases in viewing hours and subscribers over the past five years. Among the major factors affecting the uptake of video-on-demand (VoD) services is the affordability, quality of content and convenience. In particular, the flexibility in accessing and viewing on-demand content, when, where, and on whichever screen. The viewing technology within Australian homes is a key aspect of the overwhelming increase in the uptake of these services. In 2019, the average number of screens within an Australian home was 6.6. The penetration rate of various screens types at the conclusion of 2019 included; high definition television 98%; internet capable television 54%; smartphones 87%; tablets 60% and internet connectivity 89% (ThinkTV 2019).

A key question that will be raised within this White Paper is the accessibility of screen media content in the current media landscape for Australians with disabilities, in particular the VoD services which are still in a state of growth. These services are marketed as *flexible* and *accessible* across multiple screens, but this is not true for all Australians. Almost all of the SVoD services currently available in Australia were 'launched without an accessibility policy' (Ellis et al. 2018, p. 101). The accessibility of VoD services and a defined accessibility policy remain critical unresolved issues that see Australians with disabilities facing significant barriers in accessing VoD services and content available in Australia. While AvoD services, such as YouTube, are recognised as a significant delivery model of screen media content, this paper focuses primarily on the provision of accessible services by BVoD and SVoD services.

As discussed in this paper, the lack of a flexible and inclusive viewing experience for all Australians is an issue that must be addressed to allow equal media access for the almost 20% of the Australian population that identify as experiencing disability.

This paper will breakdown the various factors associated with accessibility, disability and screen media content in Australia. Some of the key discussion areas within the paper will include:

- Provide an overview of the past and current state of the Australian media landscape
- Define and explain the social model of disability in terms of access to media content
- Outline the current state of media accessibility, and interrogate what 'accessible' media looks like
- Provide a comparative analysis of current SVoD and BVoD accessibility practices
- Suggest solutions to the barriers to accessibility faced by Australians living with disability

As evident within this paper, the Australian (and global) media landscape has reached a critical juncture. This is the perfect opportunity to consider all aspects of the media, including how to create and distributed screen media that can be enjoyed by all Australians. We believe the following should be considered:

- Screen media services (Television, SVoD, BVoD, AVoD etc.) need to be more transparent of the accessibility features their services provides and list this publicly on their website.
- Content creators should be more proactive in the production of screen media that that is easily accessible to all Australians.
- A need for stakeholders in the production and distribution of media content to be aware of the accessibility of the media they produce, and the accessibility of the platforms used to distribute their content.
- A regularly updated chart of all screen media services (Television, SVoD, BVoD, AVoD etc.) available to the Australian public which clearly details to media producers, distributors and the audience the accessibility tools available on each service and the percentage of content available using these tools.

Background

Australia's Everchanging Media Landscape: Past and Present

The internet and digitisation of media content has significantly disrupted the models of legacy media, broadcast, distribution and consumption. Prior to digitised media, the different forms of mass media (radio, motion pictures and television) each had their own 'distinct capacities and constraints' (Hodkinson 2010, p. 33). Motion pictures were viewed at a cinema, radio listened to on a radio receiver and television viewed on a television screen. Digitisation has allowed for 'text images, music speech and video all to be converted into a universal system' (Hodkinson 2010, p. 33). With the incorporation of almost universal uptake of the internet and digital media technologies, media of any form can now be accessed on demand through multiple devices, platforms and screens.

The impact of the changes in media distribution and consumption in the context of Australian media landscape has seen video-on-demand (VoD) services significantly outpace traditional screen media formats such as broadcast television, DVD and cinema. By 2014, over 50% of Australians were consuming professionally produced film and television video content via the internet (Screen Australia 2014). Aside from ad-supported video-on-demand (AVoD) services such as YouTube, broadcaster video-on-demand (BVoD) services provided some of the first free streamable video content to Australian audiences, with the launch of ABC iView in 2008 and 7PLUS and SBS OnDemand in 2011. The notable introduction of subscription video-on-demand (SVoD) services in Australia came a few years later in 2015, when the Australian media landscape fundamentally changed and continues to do so.

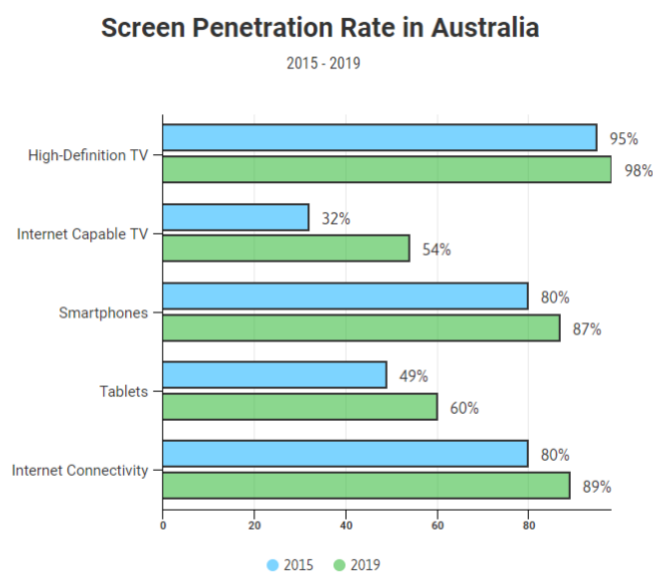
Several SVoD services were launched in 2015, including the global giant Netflix. This was the start of what was later referred to as the 'streaming wars' (Christensen 2016). As both local and international streaming giants began battling it out for the lion's share of the Australian subscription media consumer market. At that time, Christensen had been optimistic that the streaming wars would ultimately prove beneficial for consumers, making available 'more content, at a cheaper price, across more platforms' (ibid).

Since that time, the market has exploded with a wide range of SVoD services catering to all audiences and demographics. At the time of writing this paper, Australian audiences had access to more than ten SVoD services including Amazon Prime Video, Apple TV+, Binge, Disney+, Hayu, Foxtel Now, Netflix, Stan, 10 All Access, and YouTube Premium. This does not include the BVoD services provided by the five Australian free-to-air (FTA) television broadcasters; ABC iView, SBS

OnDemand, 7Plus, 9Now and 10Play. Since their respective launches, these BVoD services have seen a steady increase in viewership. Between 2018 and 2019 alone there was a 36% increase in the consumption of BVoD content, with Drama, Children's, and Reality television rounding out the top three genres consumed via these services (ThinkTVb 2019).

As the number of SVoD services available continues to rise, so too does the number of Australians consuming them, with a considerable number of Australian homes subscribing to multiple services. In March 2020 Netflix had the greatest uptake with almost half of the Australian population (12.5 million) holding active subscriptions. This was followed by Stan with 3.7 million, Disney Plus with 2 million, Amazon Prime with 1.6 million and YouTube Premium with 1.4 million. To put this into context, Foxtel Australia's PayTV service was reported to have 4.8 million at this time, but this figure did include its sports service, Kayo Sports (Roy Morgan 2020). This growth is projected to continue not only in Australia but globally, with subscriptions for SVoD services expected to surge by 519 million between 2019 and 2025; an increase of 81% (Murray 2020, p. 2).

Australians now have greater content choice than ever before and are able to view content when, where, and on whichever screen they wish. Both SVoD and BVoD services are promoted to allow for a flexible viewing experience in comparison to traditional television viewing, which is arguably a key part of their attraction. The explosive popularity of SVoD and BVoD services has been assisted by the growing number of screens within Australian homes, which in 2019 was 6.6. The penetration rate of various screens types has also significantly increased over the past 5 years. At the conclusion of 2019 the penetration rate of high definition television was 98%, compared to 95% in 2015. The increased uptake of other screen technologies included; internet capable television 54% (2019) compared to 32 % (2015); smartphones 87% (2019) compared to 80% (2015); tablets 60% compared to 49% (2015); internet connectivity 89% compared to 80% (2015) (ThinkTV 2019, p. 3 & RegionalTAM, OzTAM, Nielsen 2016, p. 4). It is this increased uptake of portable and contemporary screen technologies that will continue to fuel the changes in media distribution and consumption.



The increased uptake of SVoD and BVoD services and the growing dependence on screen-based technologies for media distribution and consumption raises concerns as to whether this change will provide the same flexible and accessible content for all Australians, particularly Australians with disability. In this paper, we argue that the accessibility issues already associated with broadcast television, and the increasingly blurred lines between traditional television and VoD services, has created the circumstances necessary to discuss solutions for true accessibility for all Australians, across all media platforms.

Nearly one fifth (17.7%) of the Australian population identify as people with disability, according to 2018 Australian Bureau of Statistics (ABS) figures (ABS 2019). The percentage increases with age; 11.6% of people under 64 years of age identifying as experiencing disability, in comparison to 49.6% of those aged 65 years and over (ABS 2019). Based on the data of the uptake by Australians of SVoD services and the recent ABS data, it is clear that many Australians with disability are watching BVoD content and subscribing to SVoD services. However, the question remains as to the extent to which BVoD providers, SVoD services and all associated stakeholders are providing content that is accessible for all audiences, including people with disability.

Disability

Defining Disability

The way we see, speak, and think about disability – in real life, and in fictionalised representations of real life in the arts, the media, and popular entertainment – defines disabled identities, which in turn defines disabled people's access to agency, authority, and power in society. (Hadley & McDonald 2019, p. 1)

As with other disability studies focused on arts, culture, and media, this paper is written through the social model lens. The social model of disability, considers disability to be imposed on individuals with impairments by way of a lack of consideration for diversity (Haegele and Hodge, 2016). The social model posits that as society contributes to the disability of people with impairments, it is society that is responsible for ensuring that those living with impairments are able to engage unhindered in social and cultural participation (Shakespeare, 2006). People with Disability Australia (PWDA) define the social model as;

... the result of the interaction between people living with impairments and an environment filled with physical, attitudinal, communication and social barriers. It therefore carries the implication that the physical, attitudinal, communication and social environment must change to enable people living with impairments to participate in society on an equal basis with others. (PWDA n.d)

Such a perspective places the responsibility for inclusion on society, rather than the individual. This model sees people with disability being 'recognized as human beings who are situated within particular social and cultural structures, knowledge and policies that enable but also disable their subjectivities' (Garrisi & Johanssen 2020, p.2).

The way in which disability is defined is important, because the language people use to describe individuals with disabilities influences societies' expectations and interactions with them (Barton 2009). Conceptualisations of disability are influenced by professional organisations and individuals who have the power or authority to establish definitions in society and are in command over the knowledge within a field (Haegele and Hodge, 2016, p. 193). Due to the immense reach of media, it has a significant role to play 'in how disability is imagined and how it might be reimagined' (Ellis et al. 2018, p. 95). The point raised by Ellis et al. (2018) should be considered by media organisations and associated stakeholders in both the representation of disability on-screen, and in relation to accessibility of content off-screen; the key focus of this paper.

In terms of VoD services, the social model of disability provides a conceptual basis from which SVoD and BVoD services, and associated stakeholders, can be encouraged to adapt their services and content. To ensure all Australians, including people with disability, are able to access content across all screens. Another element of this, as mentioned previously, is screen

technologies. Due to the fast-paced nature of technological progress, the development of assistive technologies has often been reactive by design and by the time adaptations for people with disabilities are developed, technology has often moved on and once again lacks diverse accessibility options. This process of having to adapt technology for people with disabilities, rather than create equally accessible technology, is in fact part of the problem.

“Equal Access is Required by Law”, But is it?

Equally accessible technology should be central to the design and development of screen media technologies, and not simply tacked on as an afterthought. The human rights framework states that ‘people with disabilities have the same rights as everyone else’ (Ellis et al. 2018, p. 95). During the 2006 United Nations Convention on the Rights of Persons with Disabilities (CRPD), mass media, including services via the internet, were encouraged to ‘make their services accessible to persons with disabilities’ (as cited in Ellis et al. 2018, p. 95). But as Wentz, et al. (2013) notes, ‘there is nothing about technology that makes it inherently accessible or inaccessible’. Rather it is ‘the choices made by those developing and implementing technology’ that will determine its accessibility. As discussed within this paper, there is a clear failure by media companies and associated stakeholders in developing services that allow inclusion and equal access for those people with disabilities. The United Nations Convention on the Rights of Persons with Disabilities (CRPD) came almost five years prior to many of the BVoD services launching in Australia, and almost ten years prior to many of the SVoD services.

In the context of traditional ‘television’, as Looms (2012, p. 4) argues, disability and accessibility are not a simple discussion, nor are there simple solutions. Looms uses the interaction map of Keates (2007) as a starting reference, which consists of three key elements; the *product*, a *user* and the *task*. The *user’s* ability to complete various tasks associated with the *product* are dependent upon the *product’s* demands and environmental factors. In the case of television content, Looms argues, the *product* is not a singular entity. Instead, it consists of three components;

- the content (television channel, programmes and information about content),
- access services (subtitles, audio description or visual signing to accompany the content);
- the platform (television set and a remote control)

If we are to expand upon Looms (2012) argument, to be more reflective of the screen media landscape of today, then this further complicates the issue as we would need to include further items to each of the three *product* components:

- the content (SVOD, BVoD, other streaming services, social media),
- access services (subtitles, audio description or visual signing to accompany the content);
- the platform (tablet, smartphone, smart TV, web interface, internet access and the list could go on)

Adding these additional items expands the number of stakeholders relevant to the content accessibility debate, and further emphasises the complexity in delivering accessible content to an audience in the current multi-screen, multi-platform and multi-service media landscape.

The current media landscape also creates confusion in relation to the old (television & film) and new services (BVoD & SVoD) in a policy framework context. For example, in the US in 2012 Netflix was forced to commit to captioning to its content under the *Americans with Disabilities Act (ADA)*. The confusion came when the federal appeals court overrode the decision. The court stated that Netflix did not have to comply ADA as it was not connected to an ‘actual physical place’ (Hattem as cited in Ellis & Kent 2015). The question of the internet as a ‘physical place’ raises concerns for the implementation of local policies – in terms of both content and accessibility – upon global streaming services that exist solely online and may not have a physical location within that region.

Further, the significance of television and screen media in social life is often understated. Access to screen media content offers consumers insight and information into political, social and cultural happenings both locally and abroad. In fact, it is a significant provider of the information necessary for individuals to be able to participate in democratic processes by providing access to debates, alerts and advertisements. Access to such information and online services is covered in the *Australian Disability Discrimination Act (DDA)*, which states that ‘equal access for people with a disability in this area is required by the DDA’ (Australian Human Rights Commission 2012).

...all appropriate measures to ensure that persons with disabilities can exercise the right to freedom of expression and opinion, including the freedom to seek, receive and impart information and ideas on an equal basis with others and through all forms of communication of their choice (Australian Human Rights Commission 2012).

The inaccessibility of screen media for a portion of the Australian population is considered to be ‘a significant form of social exclusion’ (Ellis et al. 2018, p.3) and has the potential to ‘segregate people with disabilities as the permanent second-class citizens of the information age’ (Wentz et al. 2013).

Accessibility

Accessibility of Screen Media

As a society, we are very diverse and have different needs when it comes to accessibility. Even though 'accessibility' is most commonly associated with physical barriers that prevent people with physical impairments from entering buildings, the term refers to many areas of life, one of which is access to audiovisual media (Jankowska 2019: 231).

Despite the 'sizeable legacy of scholarship' that can now be drawn upon relating to disability in the areas of arts, culture, and media studies, the practical applications of this scholarship is far less evolved. This is arguably due to the fact that 'misleading assumptions about people with disabilities are deep seated within our culture and endlessly replicated through the media (Barnes, as cited in Garrisi & Johanssen 2020, p.5). As evidenced within this paper, the practicality and incorporation of solutions that would allow easily accessible screen media content for a person with disability is insufficient.

A lack of research cannot be used to excuse this, but rather a lack of institutional acknowledgment. Whilst we note that not all content is intended for all Australians, we would argue as Looms has, that 'the whole population should be free to access any given [television] programme' (2012 p. 10). Yet the question remains how to achieve this when television is now accessible across multiple screens and multiple platforms. More broadly, screen media content is now accessible via online methods, which has a number of its own accessibility concerns.

The Internet: Central to Accessibility of Screen Media Content

This paper is focused on the accessibility of screen media content, but this cannot be discussed without first understanding the role played by the internet in its accessibility. Tim Berners-Lee, W3C Director and inventor of the world wide web, stated in 1997 that the power of the web was in its *universality*. He noted that an essential aspect of the web was that it would allow for 'access by everyone regardless of disability' (as cited in WAI 2019). Berners-Lee's optimism for the web 1.0 did not come to fruition and unfortunately its shortcomings in accessibility for everyone flowed through to web 2.0. As Ellis and Kent (2011, p. 2) argue, 'web 2.0 has been developed in and by the same social world that routinely disables people with disability'. Screen media content, distributed via online methods, has replicated the limitations of usability and accessibility of web 2.0 to further exclude people with disability. In the instances of VoD services, it has arguably compounded content accessibility issues for people with disability, due to 'cumulative effect of reduced usability, increased barriers to access, and a lack of accessibility features' (Ellis, Kent, Locke & Clocherty 2017).

It is not only online and web interfaces that must be considered when analysing the changes in screen media content viewing and distribution, in terms of the impact on people with disability. As the internet continues to be accepted a viable distribution platform for screen media content, by both the Australian public and media institutions alike, its success and uptake requires greater internet access and speed. In 2019, more than 86% of the Australian public had internet access (Internet World Stats 2019). What's surprising is that as of May 2020, Australia was ranked 8th in the world for mobile speed at 67.58 Mbps. Yet for fixed broadband, the Australian ranking plummeted to 63rd position, with an average speed of 45.92 Mbps (SpeedTest Intelligence 2019), despite the continued rollout of the National Broadband Network across Australia. These speed tests are challenged by NBN Co, the company that was established 'to design, build and operate Australia's wholesale broadband access network' (NBN Co. 2020). A report commissioned by NBN Co. argues that, 'there is no global, standardised way to assess consumers' broadband speeds' (AlphaBeta 2019, p. 8). The same NBN Co. report, states that 'Australia ranks 22nd using representative broadband user data' and rises to 17th when 'using data more representative of entire population' (AlphaBeta 2019, pp. 16-7).

A key consideration of media companies using the internet as a distribution method is the consistency of legislation and policy:

- Should a television broadcaster, broadcasting content and streaming the same content via their BVoD service, follow policy and legislation across both platforms that relates only to *broadcasting*?
- The same could be asked of a SVoD services; should they follow the same policy and legislative restriction of television broadcasters in the region the SVoD provider is servicing?

These questions are still unanswered and can make it difficult to enforce standards, particularly around accessibility features for those with disability; which can be seen by media companies as an additional expense. As the speed of change in the industry shows no sign of slowing down, it is vital that regulators are able to form meaningful policy that meets the current media landscape and market demand for accessible SVoD and BVoD content for all Australians, including those living with disability.

Accessibility Features

Within the Australian media landscape, accessibility features and inclusive design are relatively hit and miss and, in some cases, fail to meet current global standards. Accessibility features refer to inclusive design choices and elements of hardware and software, that enable people with disabilities to utilise technology in a meaningful and straightforward way. In terms of screen media, Carmichael, Rice and Sloan (2006, p. 65-66) note that, the tools ‘commonly recognised by broadcasters and regulators’, include subtitles, captions, audio description and signing. However, there are also less visible tools, like audio-enabled electronic programming guides (EPG), screen readers, and accessible remote controls that are designed with inclusivity and access in mind (Carmichael, Rice and Sloan 2006, p. 66). As an in-depth look at every accessibility feature currently available is beyond the scope of this paper, we have chosen to focus on what we believe are the two most significant accessibility features available to consumers of screen media; closed captioning and audio description.



Universal Closed Captioning symbol

One of the most widely recognised and utilised screen media accessibility features is closed captioning. In the world of screen media, captioning refers to the textual depiction of speech and other sounds in order to provide supplementary or interpretive information to the viewer. Captions are often displayed along the bottom of the video screen, but can also be displayed on additional screens or in more dynamic ways that indicate where certain sounds are coming from. While captioning is particularly useful for people who are deaf or suffer from hearing loss, all Australians can benefit from closed captioned content. For instance, the ubiquity of smartphones has seen people consume greater amounts of media content in noisy, public environments, relying on captions to fully engage with the content. Captions are also used commonly on televisions within public waiting rooms such as doctor’s surgeries and airports.

There are two types of television captions; closed captions and open captions. Open captions are ‘burned’ into the original print recording, and therefore are always visible. Closed captions require technology that can access the closed captioning, such as a digital set-top box or a capable television, which allow this feature to be toggled on and off. In today’s media landscape,

closed captioning is far more common than open captioning due to the near universal use of capable technologies.

In Australia, the regulation of captioning for television programming is monitored by the Australian Communications and Media Authority (ACMA). The Authority ensures that available captions comply with legislative requirements, industry codes of practice and the Television Captioning Quality Standard. However, this regulation is only applicable to select programming produced by commercial and public FTA broadcasters. While captions have been available on Australian television since the early 1980's (Varley 2008), it was not until 2012 that amendments to the Australian Broadcasting Act were made. The amendment required Australian broadcasters to caption all television programs aired on their primary channel between 6am and midnight by 2015; the same year Netflix launched in Australia.

Currently, the ACMA regulations state that both commercial and public FTA broadcasters must show captions:

- From 6 am until midnight on all programs
- On news and current affairs programs at all times

However, these regulations do not extend to the multi-channels offered by FTA broadcasters. Programs broadcast on a FTA multi-channel only require captions, if the program has already been broadcast with captions on the main channel. Most significantly, ACMA's regulations do not extend to the provision of SVoD or BVoD services, regardless of if a program has previously been broadcast with captions.



Universal Audio Description symbol

The other accessibility feature commonly discussed is audio description (AD). This is a track that is 'narration included between the lines of dialogue which describes important visual elements' (Ellis et al. 2018, p. vi). AD is delivered as an accompaniment to screen media content through the provision of a separate audio track and uses relatively simple technology that can enhance the viewing experience for all viewers. However, it is particularly important as an access tool for individuals who are blind or have low vision. Programming best suited for AD accessibility includes dramas, documentaries and narrative, as AD requires enough gaps in dialogue to accommodate

the insertion of audio descriptions. Yet not all content can be successfully incorporate AD, and it can be difficult to provide AD accessibility for news, sports and current affairs programming due to the limited gaps between dialogue.

AD has been shown to increase the knowledge retention and comprehension of screen media for those with visual impairments (Schmeidler & Kirchner 2001) and is a central part of providing inclusive cultural engagement for all members of society (Snyder 2005). The expansion of screen media industries, paired with the increased prioritisation of inclusivity and access to media products, has seen AD technologies become increasingly available across the world. As of 2017, AD had been made available on broadcast television in the US, New Zealand, Korea, Thailand and many countries across Europe. Despite this, the provision of AD in Australia continues to lag behind in this global standard and the availability of this service remains extremely limited even though AD content already exists in the country (Ellis et al. 2018).

The continued efforts for AD content to be made available to Australian audiences culminated in the *Broadcasting Services Amendment (Audio Description) Bill* being introduced to the federal senate on 12 February 2019. It is the intention of the bill to enforce a minimum number of hours of AD programming per week on Australian broadcast television networks. In late 2019 the Federal Government announced that it would contribute \$4 million to assist the ABC and SBS in introducing AD content to their television programming (Vision Australia 2019). As of June 2020, both ABC and SBS are now providing up to 14 hours per week of AD programming on their television channels, yet little to no movement has been made in extending this availability to the broadcasters' online video-on-demand services.

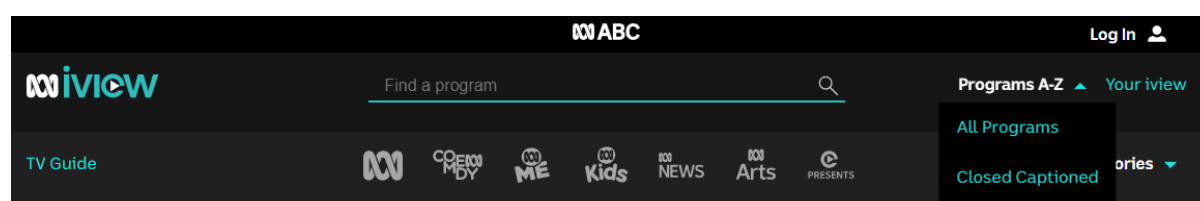
Accessibility Practices in Australia

Comparative Analysis of SVoD and BVoD Accessibility

Some may argue that many, if not all, of those features discussed previously by Carmichael, Rice and Sloan (2006, p. 66), should be available when content is distributed across a BVoD and SVoD service, allowing a more *universal* and *flexible* viewing experience for all. As will be shown in the following section, many of these features are not available via BVoD and SVoD services, even when the programming has previously been broadcast with accessibility features. This is not an issue only isolated within Australia, but a global issue. As more streaming companies begin to expand globally, it is imperative that accessibility options for all subscribers, viewers, customers (however you wish to describe them) be further analysed and policies put in place.

Public Broadcaster Video on Demand: ABC's iView

To date, ABC's iView is considered the 'most accessible catch-up provider in Australia', due to the fact that it applies most of the same principles for both its broadcast and online content (Ellis et al. 2017). As such, closed captions are available on much of ABC iView's programming. At the time of writing, ABC iView had a total of 915 programs available on the platform, and 620 of these had closed captioning available. In addition to its wide range of closed-captioned content, iView also makes clear and accessible the content available with closed captions, via a dedicated program menu.



To date, ABC has trialled AD programming several times on both its broadcast and VoD outlets. In April of 2015, iView launched its second, more robust trial of audio described (AD) programming. The 15-month trial was intended to develop the ABC's understanding of implementing AD in a digital environment, including the best practice, systems management, costs and demand associated with AD content. The trial saw over 158,000 plays of AD programming, indicating that a significant portion of the population would directly benefit from the accessibility of AD content. Participants who used the service during the trial 'found it a valuable enhancement to their media engagement and their social interactions' (Britt 2019).

In the *Final Report to the Department of Communications and the Arts on the Trial of Audio Description on ABC iView*, the trial was described as ‘successful, with limited technical impediments’ (ABC 2016). The report outlined the valuable enhancement to media engagement and social interaction experienced by those who utilised the AD service during the trial. However, it also raised a number of concerns regarding the widespread implementation of AD in the Australian television broadcaster and BVoD landscape. In particular, the report outlines the budgetary implications for broadcasters and broader legislative consequences that may arise as a result of introducing AD programming on a more universal scale. The report suggests;

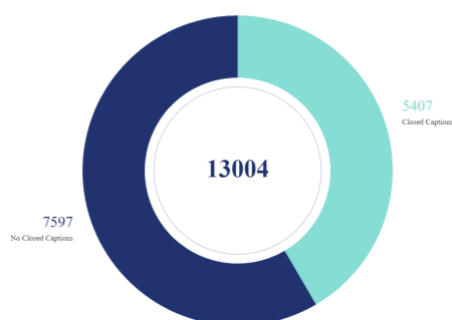
...should the Government seek to introduce AD it must do so only after full consideration of these matters and after proper consultation with the broadcast industry, advocacy groups and the relevant audiences. (ABC, 2016)

Currently, the ABC is making up to 14 hours of AD programming per week available on its broadcast channels. This programming is available across a range of genres, including drama, documentary, lifestyle and children’s content. However, according to the ABC Help Centre website, AD content ‘is not currently available on ABC iView, however there are plans to introduce audio description at a later date’ (ABC, 2020).

Commercial Broadcaster Video on Demand – 7PLUS

The Seven Network’s BVoD service *7Plus* (at the time was known as PLUS7) became the first commercial BVoD service in Australia to provide closed captioning upon its launch in April of 2014. As of July 2020, 7Plus hosts a catalogue of 13,004 programs, with closed captioned available for more than a third (5,407).

Closed Captioning on 7Plus



Although 7Plus does provide closed-captioned content, the information available for consumers regarding what programs are captioned is limited to a single statement: ‘subtitles and captions are not available for all content’¹. The 7Plus website does not facilitate a filtering option for closed-captioned content as shown in the ABC iView example. Instead viewers are required to select individual programs to access information relating to accessibility options. This lack of clear communication of accessible content remains a consistent criticism of VoD services and indicates a relative disregard for the provision of accessible screen media content for all Australians.

Australia remains the only English-speaking nation in the OECD that does not offer AD content on broadcast television. It goes without saying that this trend extends to Australia’s commercial broadcaster BVoD services, with 7PLUS being no exception. Throughout the years, commercial stations have been steadfast in their silence regarding plans for future AD programming on their channels. The limited amount of information regarding accessibility practices on the 7Plus website makes no mention of AD programming,

Subscription Video on Demand – Netflix

Netflix remains a leader in the provision of accessible screen media content on a global scale. Described by one commentator as ‘a deaf person’s utopia’ (adefinty2, 2015), Netflix has provided closed captioning on 100% of its programming since 2014. Indeed, upon its launch in Australia in 2015, it was possible to watch every available program on Netflix with closed captioning. Furthermore, it is now possible to change the appearance of closed captions and subtitles, including adjust font, text size, shadow and background colour².

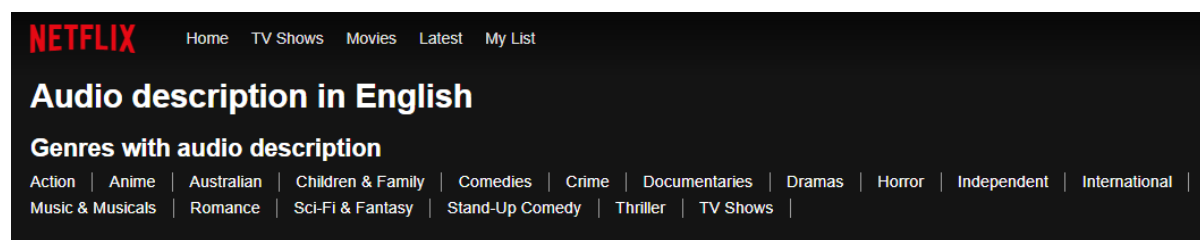
However, the provision of this accessibility was not the result of benevolent corporate sentiment, but a lawsuit filed against Netflix by the National Association for the Deaf in America (Wooten, 2012). The 2012 court ruling deemed Netflix and other streaming services to be ‘places of public accommodation’ and as a result, required that they provide accessible content to all Americans. This made mandatory closed captioning on 100% of Netflix’s programming by 2014. Netflix’s accessibility model is the result of court decisions and suggests that there is little incentive for the provision of accessible media.

The Netflix Post-Partner Program (NP3) is the collaborative body of Netflix Inc. that works with post-production companies around the world to deliver, among other services, audio description.

¹ <https://support.7plus.com.au/terms/>

² <https://help.netflix.com/en/node/100267>

In Australia, AD was made available to customers of Netflix one month after the service launched locally, marking the first time Australian audiences had access to a reliable and consistent AD service (Ellis et al., 2018). The Netflix website makes it relatively straightforward to navigate to AD content. A link is provided at the bottom of the main page directing users to a large catalogue of AD programming, which allows further filtering for genre categories.



Paired with the compatibility to accessibility devices such as screen readers, voice-command software and assisted listening systems (Netflix, n.d.), Netflix's accessibility model far outweighs other SVoD, BVoD and AVoD services currently available in Australia.

Accessible Content for All: Is it a possibility?

As has been discussed within this paper, there are a number of issues that face the progression of a media landscape that will impact upon accessible content for all. Currently, Australian television broadcast legislation does not extend to BVoD and SVoD services and is not reflective of the current, nor the future, Australian media landscape. There are four key groups that can lead the progression of greater accessibility of screen media content in Australia; media distributors, broadcasters and content creators; the government (state and federal); disability community and advocacy groups; and Australians with disability.

The media distributors, broadcaster and creators need to be more proactive in the delivery of content with accessibility features, regardless of the platform. Across the various platforms, broadcast, BVoD and SVoD, media organisations must be more transparent in the content that has accessibility features, this should be clear within menus and/or on the organisation's website. To assist with the increased accessibility of content, content creators can consider accessibility within the early production stages, as providing accessible content directly to the media distributors could assist in the progress of expand the amount of content with accessible features, across all media platforms in Australia.

Whilst the preference is for media distributors, broadcasters and creators to be proactive in the creation and distribution of accessible content. Unfortunately, as discussed within this paper and prior research, VoD services are not necessarily inclined to prioritise accessibility features unless it is required by legislation. As has been discussed, legislation associated with the accessibility of media in Australia is limited and is not representative of the current, nor the future, media landscape. Developing appropriate legislation requires the government to work with all stakeholders to develop strategies that recognise key accessibility features.

The accessibility features discussed within this paper ought to comprise a central part of the production, broadcast and distribution processes of screen media content, rather than operating as an aftermarket addition and a further expense. Although both the Australian Government and broadcast industry have stated previously that offering accessible features like AD are too technically complicated and financially prohibitive to be widely available on Australian broadcast television. In addition to legislative requirements, screen content funding and incentives could include requirements related to accessibility features being part of the production and distribution of screen media content to broadcast and other VoD services in Australia.

The other two key stakeholders, disability community and advocacy groups, and Australians with disability should be the central stakeholders, in the implementation of accessible screen media content. It is these two groups that can assist other stakeholders in creating content, legislation, funding and information that will allow Australians with disability to be able to access screen media content across various platforms. Unfortunately, people living with disability are also disproportionately affected by unemployment and poverty, and as such, are unlikely to have the disposable income available to access media through paid SVoD services. This must also be considered in the discussions associated with accessible screen media content for those with disability.

As discussed at the beginning of this paper, the Australian (and global) media landscape has reached a critical juncture. This is the perfect opportunity to consider all aspects of the media, including how to create and distributed screen media that can be enjoyed by all Australians. We believe the following should be considered:

- Screen media services (Television, SVoD, BVoD, AVoD etc.) need to be more transparent of the accessibility features their services provides and list this publicly on their website.
- Content creators should be more proactive in the production of screen media that that is easily accessible to all Australians.
- A need for stakeholders in the production and distribution of media content to be aware of the accessibility of the media they produce, and the accessibility of the platforms used to distribute their content.
- A regularly updated chart of all screen media services (Television, SVoD, BVoD, AVoD etc.) available to the Australian public which clearly details to media producers, distributors and the audience the accessibility tools available on each service and the percentage of content available using these tools.

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