

Superimposed Text – Legibility & Understanding

A review of the regulation of superimposed text



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Executive summary

This paper sets out the findings from the Advertising Standards Authority's (ASA) review of the use, presentation and comprehension of superimposed text (supers) in TV ads. Supers are used to inform viewers about limitations or qualifications relating to a headline claim presented in an ad.

The Broadcast Committee of Advertising Practice (BCAP) requires supers to be presented clearly and provides guidance to support those involved in the production, clearance and broadcast of TV ads. This guidance is also used by the ASA to inform its decision-making in response to complaints about supers in ads.

This ASA review of supers has involved an analysis of existing literature, a public call for evidence, and the commissioning of qualitative research with TV viewers.

The findings from this project point to various factors that make it difficult for viewers to read or understand the text in supers. The presence of these factors in a range of TV ads suggests that viewers may be unable to fully read or comprehend the supers in a significant proportion of broadcast ads.

To address this situation, we propose that:

- the ASA takes a stricter approach to ensure qualifications are presented clearly, in line with Rule 3.11 of the UK Code of Broadcast Advertising (BCAP Code);
- the BCAP guidance is strengthened to reflect the findings of this review; and
- the ASA and BCAP work together to design a programme of implementation for the new guidance, to include plans for publication and enforcement.

Refreshed guidance, which reflects viewers' actual engagement with supers, will help to provide further clarity to regulatory partners on the methods of supers' presentation that consumers are likely to understand. It will be accompanied by a programme of stakeholder engagement and knowledge sharing, which will allow time for advertisers and their agencies to accommodate the changes into their creative and ad planning processes.

The combination of a tougher stance on enforcement and stricter guidance will reinforce confidence for consumers in the advertising they see and enable the ASA to do more to ensure TV ads are clear so that consumers are not misled.

The new approach to considering complaints about supers will be implemented via a two-stage transitional period. From 1 March 2019, the ASA will seek to resolve cases informally, issuing advice based on the guidance to advertisers on how to improve potentially problematic supers. From 1 September 2019, the ASA Council will begin to make formal assessments of supers in TV ads using the refreshed guidance.

Introduction

Television ads very often include superimposed text ('supers') to inform viewers about limitations or qualifications to a headline claim presented in the ad. The ASA requires that 'Qualifications must be presented clearly', in line with Rule 3.11 of the BCAP Code and associated BCAP guidance.

This paper sets out the findings from the ASA's review of the use, presentation and comprehension of supers.

To inform this review, we considered the BCAP guidance, which is intended to support the ASA, and all those involved in the production, clearance and broadcast of TV ads, in making sure that supers are easy to read and understand. The guidance covers a range of factors, including the technical aspects of layout and style, colour formats, and the length of time that supers are on screen.

Further, we carried out a review of the available literature and invited responses to a public call for evidence. We also commissioned consumer research to establish how viewers engage with supers and to gain a better understanding of the factors that affect whether they are able to read and understand supers while watching TV in their own homes. The findings from these strands of work suggest that there are areas of the existing guidance that could usefully be updated.

This paper outlines the findings from each stage of the project. It then sets out the key actions arising from this review and explains how these will be implemented.

Background

The BCAP Code requires that ads must not mislead viewers. Information necessary to qualify claims in ads must be presented clearly, with guidance available from BCAP on how advertisers should achieve this. Supers are an important means to convey qualifying information to viewers. They are overlaid onto the ad and usually appear at the bottom of the television screen.

The existing guidance on supers covers factors relating to:

- the size of the super – encompassing the vertical height of the text
- the typeface of the super
- spacing between words and letters
- the contrast between text and background and colour combinations
- edging and shadowing around the text
- position and orientation of the text
- the avoidance of unnecessary text
- words to avoid – including unfamiliar words, jargon, and legalistic words
- the length of sentences
- competition with other messages in the main ad creative
- numbers and calculation – to avoid multiple pieces of numerical information
- appropriate duration of time

The findings from this review reinforce the key areas set out in the current guidance, while identifying ways in which these may be updated in order to improve legibility and comprehension for the benefit of TV viewers.

Project design and findings

We conducted a literature review, a public call for evidence, and commissioned in-depth qualitative research with TV viewers. The approach to, and key findings from, each of these stages are set out below.

Literature review

The current guidance is underpinned by a report published by the Independent Television Commission (ITC), *Presenting supers in television advertisements: factors influencing their perception and comprehension* (1991)¹. This report reviewed relevant evidence on supers, examining both intrinsic factors (the nature of the text itself) and extrinsic factors (the relationship between the text and structure of the advertisement in which it is displayed).

The report noted that little research had been conducted addressing viewers' interactions with supers in conditions similar to those in which they were presented in TV advertising. However, on the basis of the existing body of evidence, it made recommendations for the presentation of supers relating to typeface characteristics, text size and arrangement, background contrast, duration of presentation, and contextualisation of supers within the ad overall. The report also recommended further testing of certain factors².

In 1996, the ITC published *Superimposed text in television advertising: an investigation of factors affecting its readability and comprehension*³. This presented the conclusions of a number of experiments assessing the legibility of supers. The report found that longer duration of hold (the amount of time the super is on-screen) led to better recognition, comprehension and recall of information in supers, recommending that they should be presented on screen for at least six seconds to allow for good processing and comprehension⁴.

TV formats and the public's viewing habits have altered greatly since this research was conducted. We therefore carried out a literature review, with the objective of identifying recent research into the legibility and comprehension of supers specifically in TV advertising. This was carried out using Google Scholar with search term combinations including "legibility", "readability", "comprehension", "superimposed text", "small print", "on screen text", "advertising".

We located a reasonable amount of literature assessing how people read printed text, including print ads, text on websites, small print in legal documents, as well as subtitles and other types of on screen text in TV programming. However, we did not find research on the comprehension of supers in advertising, or any context in which text was presented in an analogous format – that is, for a relatively short duration and in conjunction with other factors competing on screen for the viewer's attention.

¹ Black, Alison. *Presenting supers in television advertisements: factors influencing their perception and comprehension*. Independent Television Commission (1991) p. 57-63

² Black, Alison. *Presenting supers in television advertisements: factors influencing their perception and comprehension*. Independent Television Commission (1991) p. 57-63

³ Clifford, B. R., & Furnham, A. *Superimposed text in television advertising: an investigation of factors affecting its readability and comprehension*. Independent Television Commission (1996) p. 212

⁴ Clifford, B. R., & Furnham, A. *Superimposed text in television advertising: an investigation of factors affecting its readability and comprehension*. Independent Television Commission (1996) p. 212

We also searched for sources on the presentation of supers to particular groups, such as those with lower visual acuity and the elderly. BBC editorial guidelines recommend using colours with a strong contrast between foreground and background, use of large, clear fonts, and avoiding graphic sequences which are out of step with simultaneous verbal information⁵. UK government advice on designing for accessibility similarly stresses the importance of good colour contrast and font size, as well as linear, logical formatting⁶. It should be noted that these recommendations are not intended to apply specifically to supers, however they provide relevant insight into important factors affecting legibility and comprehension for these groups.

Call for evidence

We contacted a wide range of stakeholders including advertisers and trade bodies representing different industry sectors, other regulators, academics, non-profit organisations and consumer groups.

The Financial Conduct Authority's (FCA) guidance on prominence, which applies to all media, cites small font size, unclear type styles and coloured or patterned backgrounds as elements which could lessen, diminish or impede the communication of important information⁷. The FCA referred to a 2017 Occasional Paper⁸ which included research on advertising and consumer behaviour and also a 2016 Smarter Communications Paper⁹. The Occasional Paper and Smarter Communications paper identified a number of elements that could detract from or enhance viewer understanding. These included:

- sufficient contrast (not limited to specific colours or shapes, but the degree of difference between the foreground and background)
- the minimisation of distracting or competing images
- pictures and graphics often attract more attention than text
- text held on screen long enough to read it
- greater clarity
- larger text size
- presenting text on screen at the same time it was spoken in voiceover
- dispersing messages throughout the ad
- keeping messages succinct¹⁰

In the FCA's view, the main factors that impact on legibility of superimposed text are:

- the presence of multiple competing factors (reading can be inhibited where there are three things to do at once, such as watching, listening and reading); and
- the placement of words against a picture or moving image.

In addition, clarity can be further reduced by the size and compression of the font, the length of hold, and the size of the screen. The FCA noted that contrast could improve legibility – for example where text was shown against an 80% shaded block of colour contrasting sharply with that of the letters. In other instances, shading just the letter did

⁵ <https://www.bbc.co.uk/editorialguidelines/guidance/visually-impaired-audiences/guidance-full>

⁶ <https://accessibility.blog.gov.uk/2016/09/02/dos-and-donts-on-designing-for-accessibility/>

⁷ https://www.fca.org.uk/publication/guidance-consultation/gc11_15.pdf

⁸ <https://www.fca.org.uk/publications/occasional-papers/no-26-behavioural-insights-advertising-financial-products>

⁹ <https://www.fca.org.uk/publication/feedback/fs16-10.pdf>

¹⁰ <https://www.fca.org.uk/publications/occasional-papers/no-26-behavioural-insights-advertising-financial-products>

not sufficiently enhance legibility. To enhance comprehension, the FCA consider the information needs to be clear and concise (over-use of complex financial or legal language could also impact on consumer comprehension); provided in simple language; and presented in ways that interest and engage consumers.

Jaguar Land Rover stated that vehicle TV ads required a considerable volume of content to be shown within a restricted period of time. This could be seen to compromise the appearance and effect of the ad, so advertisers were inclined to use the minimum time recommended. They envisioned that demands for more content, larger text or longer duration of hold could become impractical and undermine the message of the ad. Changing TV viewing technology meant that consumers were increasingly able to watch online, “live pause” broadcast TV, and watch shows on catch up. They recognised that supers played an important role in communicating minimum and essential messaging, but suggested the use of alternative approaches, such as providing a link to further information online that could be viewed in the consumer’s own time.

Macmillan Cancer Support said that supers were essential to their TV advertising. Voiceover alone did not drive the same engagement with campaigns, and people needed to both hear and see a call to action for maximum effectiveness.

The Proprietary Association of Great Britain (PAGB) said that there were certain statutory requirements for information to be included in ads for over-the-counter medicines. Where it was not stated in the main ad, it was common to use supers to communicate this information. In 1990, they conducted a study to evaluate the effect of including full labelling information in TV ads, which indicated that including too much information, or increasing the prominence of essential information, could overshadow the key message of the ad without adding to consumer understanding. They were not aware of complaints relating to the use of supers for their members’ products and believed this suggested that the current system was adequate.

QMU Consumer Dispute Resolution Centre stated that decisions about engagement with supers happened early in the consumer’s information processing¹¹. Legibility was linked to perceptions of the reliability of the information provided¹². Elements that had a particular effect on legibility were duration of hold, typeface used, spacing, colour, size and presentation rate¹³. Recall, retention and comprehension of the content of supers tended to be poor¹⁴. However, understanding was increased where information was presented in voiceover in addition to text¹⁵. Some consumers viewed supers as manipulative, suggesting that they could lead to more negative perceptions of the product and ad. However, the presence of prominent supers could build consumer trust and perceptions of social responsibility, where their inclusion was seen as voluntary¹⁶.

¹¹ Bettman in Morgan, F. and Stoltman, J. 2002. Television advertising disclosures: an empirical assessment. *Journal of Business and Psychology*. Vol. 16. No. 4. p. 515-535

¹² Rennekamp, K. 2012. Processing fluency and investors’ reaction to disclosure readability. *Journal of Accounting Research*. Vol. 50. No. 5. p. 1319-1354

¹³ Murray, N., Manrai, L and Manrai, A. 1998. How super and video supers? A test of communication efficacy. *Journal of Public Policy and Marketing*. Spring 1998. 17. 1.p. 24-34.

¹⁴ Morgan, F. and Stoltman, J. 2002. Television advertising disclosures: an empirical assessment. *Journal of Business and Psychology*. Vol. 16. No. 4. p. 515-535.

¹⁵ Murray, N., Manrai, L and Manrai, A. 1998. How super and video supers? A test of communication efficacy. *Journal of Public Policy and Marketing*. Spring 1998. 17. 1.p. 24-34.

¹⁶ Thomas, V.L., Fowler, K. and Grimm, P., 2013. Conceptualization and Exploration of Attitude toward Advertising Disclosures and Its Impact on Perceptions of Manipulative Intent. *The Journal of Consumer Affairs*, 47(3), pp. 564

Radiocentre provided research they had conducted on the comprehension of terms and conditions in financial advertising on the radio. While the results related to a medium without visual messaging, they provided useful general insights indicating that the presence of complex information loses consumer attention. Participants felt that such information was mainly included to protect the advertiser, with little benefit to the consumer. Recall of key figures and messages was improved when terms and conditions were conveyed in a simpler and more focused way, without too many competing pieces of information.

Vodafone suggested that marketers should endeavour to include essential requirements in body copy of ads and small print could provide a link to further information. Vodafone also suggested that the predominant value of supers in TV advertising was to legitimise what was being claimed. It had no direct communication value as it was unlikely to be read. They said that Clearcast's time requirements meant that supers were not necessarily presented directly alongside the point in the narrative they applied to, which could take them out of context and make them less effective. Vodafone believed that the primary impact of supers on consumers was to create doubt in the main claims, and they accordingly acknowledged that claims should be written with a view to reducing the amount of legal copy required.

Consumer research

The ASA commissioned the research agency, Define, to conduct qualitative research with TV viewers. This section sets out Define's approach to the research and then examines the findings in relation to viewers' perceptions of, and engagement with, supers and the key factors associated with legibility and comprehension.

The research aims were to:

- understand how viewers use supers in TV ads;
- look at the extent to which viewers are able to read supers in TV ads in a 'real-life setting';
- look at the extent to which viewers can understand the content of supers; and
- draw out insights that may help to improve the legibility of supers in the event that the research shows that viewers are not able to read the text in a real-life setting.

The research took place over two stages. The first stage consisted of 90 minute interviews in people's homes. These interviews provided insights into how viewers use supers, with some consideration of legibility and comprehension. In total, 58 people took part in stage one – with 20 one-on-one interviews and 19 paired interviews (two people in the household taking part in the interview together). 13 ads were shown to them.

The second stage of the research consisted of 60 minute interviews in participants' homes. These interviews focused in more depth on the range of issues that impact on the legibility and comprehension of supers. In total, 80 people took part in stage two – with 26 one-on-one interviews and 27 paired interviews. 19 ads were shown to them.¹⁷

¹⁷ In total, 32 ads were included in the research. The ASA had received complaints about 24 of these ads. For 12 of these ads, the complaint was about the legibility or comprehension of the supers. Complaints against two of these ads were upheld.

Terminology and perceptions

The majority of participants assumed that supers are used in ads to show caveats and exceptions, referring to them as 'the small print' or 'the terms and conditions'. For this reason, they were often viewed with some scepticism and assumed to comprise, '*The things they don't want you to see*'. [m, York]

While most respondents believed that supers should be both legible and comprehensible, a majority across both stages reported finding them difficult to read and expressed the view that such illegibility was a common part of advertising.

Most respondents felt that supers were most important in relation to products or services that required a substantial or ongoing financial outlay. Any super providing additional information that substantially altered the perceived details of an ad was also seen as important – and many argued that such information should be made clear in the main body of the ad.

Engagement with supers

To assess how much attention participants paid to supers, respondents in stage one were first asked to watch a series of TV ads and asked what they recalled. Only a handful of respondents noticed or referred to the supers. When questioned about this, participants typically said that they did not often pay active attention to supers unless an ad had engaged their interest.

However, some difference in audience engagement with supers did emerge during the research. These were mostly driven by age, although poor eyesight was also a factor. Older respondents had the strongest interest in the information contained in supers. This group were, however, the least able to read and quickly comprehend supers, and therefore had the greatest need for them to be legible and understandable.

Legibility of supers - overview

The research identified various factors that make supers easier or more difficult to read. Define used the findings to assess the relative impact of these factors, whilst noting that a factor listed as having 'moderate impact' could still render the super illegible depending on how it was used in the context of an individual ad. They also found that the impact of the individual factors could be cumulative, meaning that legibility was likely to worsen when ads included more than one example of poor practice.

Broadly, the factors can be grouped as those relating to the contrast between the super and the background; those relating to the text (size, whether distorted, spacing of letters and words); those relating to timing (duration of super, amount of text); and what else is on the screen at the same time.

The research also found that the factors that made it difficult for participants to read or understand supers are related: a super that is hard to understand is harder to read and a super that is hard to read is also harder to understand.

Contrast and background

- **Contrast (highest impact).** The contrast between the text of the super and the background was a key legibility factor and was mentioned frequently by respondents. Participants found the supers easier to read when there was a strong contrast between the text and the background - which could be achieved through the use of bold text and a clear colour contrast. Black text on a white background was the strongest contrast in the ads shown.

'It's easy; the font and contrasting colours, and it's bold.' [m, York]

Ads using white or pale text on a light-coloured background were particularly difficult to read. While many of these ads used shadowing (such as a drop shadow) around the letters, this did not appear to improve legibility.

'The next bit you can't read at all because it's white on white.' [m, Brighton]

- **A moving background (moderate impact).** Another factor that affected legibility was whether the background to the super was static or moving. A static background typically utilised a block of colour at the bottom of the screen on which the super was overlaid. A moving background overlaid the super on the ad itself, meaning that as the ad progressed, the background changed underneath the super.

'That's less easy. The background's moving.' [pair, York]

However, a moving background did not necessarily make a super particularly difficult to read in and of itself. It was the presence of other issues – such as poor contrast or compressed text – that meant the moving background became problematic. When the text used for a super was large and had a good contrast, participants found it easy to read even when it appeared over a moving background. Conversely, text on a static block could be difficult to read – for example if the text was grey on a black background.

Quality of the text

- **Positioning of the text (moderate impact).** Participants expected supers to be placed at, or near, the bottom of the screen. When the super was placed elsewhere, it was often missed entirely. This was particularly the case when it was near the top of the screen or on the far left or right hand side and when there was additional text, such as a website link, placed where viewers would normally expect to see the super.

'It should be on the bottom... that's where you're used to seeing these things. Your eye is automatically drawn to the website at the bottom.' [f, Birmingham]

Given that respondents in the research failed to notice a super when it was not at the bottom of the screen – even when specifically directed to look at and read the super - it can reasonably be assumed that such supers are even less likely to be noticed and read when TV is watched in a natural setting

- **Size of text (moderate impact).** Larger text was easier to read than small text. Participants commented positively about ads that had larger-than-average text in the

supers. Larger size text (and sometimes text in a bold font) suggested to participants that the advertiser 'had nothing to hide'.

'If they have any interest in people actually reading their small print, they would do it like that. Nice and clear, simple information, easy to read, useful and informative.' [pair, Birmingham]

The size of the text was often raised as a minor improvement that could be made to certain sets of supers, as opposed to a factor that made supers illegible. The size of the text was more likely to affect legibility for respondents with poor eyesight and exacerbated when those respondents were also elderly.

- **Distorting text (moderate impact).** When considering text, respondents agreed that the most legible text was that which looked 'normal' e.g. it looked similar to fonts laid out in publications. Many respondents noted that some adverts appeared to compress the text – they used terms such as 'tall', 'thin', 'skinny' or 'squashed' – and to use smaller than usual spaces between words. Both of these made supers more difficult to read.

'The text is too squashed. It's not clear at all... I hate these adverts – they trick people.' [f, Brighton]

'Squashy text is hard to read, it's uncomfortable really, it's far easier not to even bother trying. So if they want us to be able to read the text, just make it nice and big and clear like Boots do.' [pair, Birmingham]

Shadowing (mentioned on p11) was raised by respondents as a 'text issue' rather than a contrast issue. They perceived that the text itself had been altered in a way that made it harder to read, rather than any issues to do with how the text stood out against the background.

Timing

- **Duration of hold (high impact).** The supers shown during the research had a range of durations - from very short to very long. As would be expected, the longer a super was on screen the easier it was to read, and vice-versa. There did come a point where the duration was too short for a super to be read, at which point it effectively became illegible:

'It wasn't up on the screen long enough.' [m, Belfast]

Appropriate duration was dependent on the number of words in the super but also the reading speed of individuals. Respondents thought advertisers should ensure that supers are displayed for a sufficient duration. This was to allow viewers (including those with poor eyesight and slower reading speeds) time to comfortably consume the full message.

- **Amount of information (moderate impact).** In general, the more text on screen at once, the harder the super was to read. Excessive amounts of text could be seen as an attempt to distract or confuse, particularly when some of the information was seen as irrelevant to the product or service.

The presentation of the text on screen also impacted on legibility –

- Supers that comprised a single, long line of text were generally considered more difficult to read than when the same amount of text was split over two lines and centred on the screen.

“You would have a job on your hands trying to read all that and actually take it in.” [pair, Birmingham]

- However, once a super was split into three or more lines, it was also considered more difficult to read, even if centred on the screen.
- The above effects were exacerbated when the information in the super referenced multiple facts, as this felt harder to read and understand than a single fact, even if both used the same number of words.
- Respondents did not have any issues reading information that was presented over multiple supers if the information was presented in short chunks, with few words in each super, and used Plain English. This style of presentation could be easier to read than presenting the same amount of information in a single super, even though it mean a shorter duration for each of the supers.

Other content on screen

- **Competing text within an ad (moderate impact).** Additional text displayed in an ad while a super was on screen was highly distracting for participants. Such text was typically more prominent than the super (e.g. bolder typeface, larger text, better contrast with the background), which made it more noticeable and easier to read and made the text within the super more recessive and harder to concentrate on.
- **Creative elements that distract (moderate impact).** The research noted that ads that have a variety of non-text creative elements could effectively distract viewers from noticing supers. Such competing elements included ‘flashes and bangs’, engaging action sequences or a catchy soundtrack. This was compounded when the super was displayed at the exact point where attention was diverted, such as not displaying a super until a key action sequence.

Comprehension of supers

Most respondents were able to understand most of the language used in supers. The exceptions that occurred typically cut across audiences, with the older audiences generally reporting more difficulties with comprehension.

The factors that had an impact on comprehension are not presented in any particular order – as different respondents found that different factors had more or less impact. They are -

- **Use of unfamiliar terminology in supers.** The use of terminology that was specific to the particular type of product or service being sold could confuse those who were unfamiliar with the product area. Ads that could cause confusion with terminology

included vehicle finance (e.g. 'personal operating lease'), loans (e.g. 'trading style'), an equity release scheme (e.g. 'accrued interest' and 'equity release') and some broadband ads (e.g. 'no caps' and 'super router').

The most obvious and consistent examples occurred in online gambling ads with terms such as 'cashing out', 'withdraw from bonus', 'fixed wagering target'. Those who had gambled online were not confused by these terms, provided that the type of gambling being advertised was one that matched their personal experience.

Over-use of unfamiliar language could reduce respondents' willingness to engage with the text. However, participants did not seem overly concerned about this, as they assumed that if they were interested in the product or service, they would be able to investigate further.

- **Inadequate explanation of terms, conditions and offers.** This could have a negative impact on the comprehension of supers. For example, referencing a 'discount card' without explaining how to acquire one or how it related to the ad.

I understand all the words so it's not that, but there's no context for it. What's this discount card and why are they writing about it at the bottom of the screen? [pair, Leicester]

- **Use of acronyms in supers.** This could make comprehension of a super more difficult – either because:
 - there were multiple acronyms within a single super. In general, the more that were used, the more challenging the overall super was to comprehend; or
 - they were ones that were not well-understood in context.

However, commonly-used acronyms such as 'APR' were well-understood and caused no comprehension issues.

- **Use of numbers, particularly complex numbers.** Large amounts of numerical information made it challenging for several respondents to fully understand the information they were seeing, particularly given the limited time within which they had to read and understand it as they watched in on screen. Even when given a print-out of the super, some found the numerical information difficult to understand.

The use of multiple numbers in a single super could confuse respondents, particularly when each of the numbers represented a different factor and used different units of measurement – such as £ per month, £ up-front cost, £ delivery fee, number of months. When numbers were presented sequentially over multiple supers, respondents found it easier to comprehend and digest the information.

Numbers could also confuse participants when presented in a way that required additional calculation – for example when presented as percentages.

Project outcomes

The findings from this review suggest that, for a variety of reasons, viewers are finding it difficult to read and/or comprehend supers in a significant proportion of TV ads. This is important because it means viewers, particularly those engaged by a headline claim, have the potential to be misled by inadequate supers.

To address this situation, we propose that:

- the ASA takes a stricter approach to ensure qualifications are presented clearly, in line with Rule 3.11 of the BCAP Code;
- the BCAP guidance is strengthened to reflect the findings of this review; and
- the ASA and BCAP work together to design a programme of implementation for the new guidance, to include plans for publication and enforcement.

Refreshed guidance, which reflects viewers' actual engagement with supers, will help to provide further clarity to regulatory partners on the methods of supers' presentation that consumers are likely to understand. More information on this is set out below.

Tougher ASA enforcement

As noted, the ASA has regard to BCAP's guidance when considering complaints about misleading advertising involving supers. BCAP's guidance includes a principle that affords the ASA considerable discretion in deciding whether supers are likely to be appropriately legible for viewers. We will use the findings of this review, working alongside the updated BCAP guidance, to inform our decision-making.

At the same time, we acknowledge that in an environment as diverse as TV advertising it is likely that approaches to supers not considered by the guidance or this review will arise. We will remain vigilant to such developments and will work with BCAP to ensure that anything detrimental to legibility and comprehension is addressed appropriately, including by issuing updated guidance.

Revised BCAP guidance

BCAP's regulatory statement is published alongside this document. Readers should consult BCAP's statement for a more detailed commentary on the various changes to its guidance.

These changes include:

- Particularly significant qualifying information should be given sufficient emphasis.
- A stricter approach to contrast between the supers and background should be taken.
- Use of shadowing and edging effects to improve legibility will be further discouraged owing to its potential to blur text.

- Greater care should be taken over the choice of typeface to avoid the use of ‘stretched’, elongated text.
- Supers should be placed at the bottom of the screen and centred.
- Shorter, centred supers are preferable to the use of full-line supers.
- Marketers must take care to avoid any detrimental impact to viewers when their attention is drawn to other ad content, including imagery or written messaging, at the same time as a super.
- Where numbers are presented in a super, viewers should not be expected to make additional calculations in order to have full understanding of an ad’s message.
- Viewers should be allowed sufficient time to read supers. The amended guidance includes an ‘additional recognition period’ on the time previously applied, to allow viewers extra time to read information that warrants greater emphasis.

Implementation

The guidance will come into effect on 1 March 2019, as part of a two-stage transitional period that recognises the potentially significant impact on the advertising industry. From that date and for a period of six months, the ASA will resolve cases informally, issuing advice to advertisers on how to improve potentially problematic supers. From 1 September 2019, the ASA will begin to make formal assessments of ads that, through complaints or the ASA’s proactive project work, are brought to their attention.

BCAP will shortly begin a programme of engagement with the advertising industry to assist their implementation of the new approach to using supers. This will allow ample time for advertisers and practitioners to accommodate the new guidance into the creative and ad planning processes.

Review

The ASA will work closely with BCAP to review the new regulatory framework for supers after 12 months of full implementation.

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