

Regulatory statement: superimposed text

Annex B – comparison table of revised versus existing guidance



Comparison table

The following table maps the revised superimposed text guidance document to the relevant provisions of the existing BCAP guidance. It is intended as a tool to illustrate how BCAP has developed and revised the guidance through its review process. As outlined in BCAP’s regulatory statement, there have been significant changes to the structure and the introductory sections that outline the guidance’s purpose and scope. In the technical part of the revised guidance (from section 5 onward), there are also several new provisions.

BCAP’s revised guidance	Existing guidance text
<p>Technical guidance on the use of superimposed text in television advertising</p> <p>Advertising Guidance</p> <p>(Broadcast)</p>	<p>Advertising Guidance Note no. 1 Broadcast Committee of Advertising Practice (BCAP)</p> <p>On-screen text and subtitling in television advertisements</p>
	<p>UK Code of Broadcast Advertising rule 3.11</p>
<p>1 Purpose</p>	<p>1 Applicability of Guidelines</p>
<p>1.1 This guidance concerns the use of superimposed text – often referred to using the term “supers” – in TV advertising. Supers provide viewers with additional information usually because it is required for legal or regulatory purposes.</p>	<p>1a The principal target of these Guidelines is ‘supers’. This is a term of art strictly applying to text superimposed onto advertisements to provide additional information, usually because it is required to be there for legal or regulatory purposes (the ‘small print’).</p> <p>Typically, the prominence of such text is minimised because it forms no part of what the advertiser wants most to say.</p>
<p>1.2 Section 319 of the Communications Act 2003 requires “(h) that the inclusion of advertising which may be misleading, harmful or offensive in television and radio services is prevented”. This function is contracted out to BCAP and the ASA by Ofcom. Alongside the primary focus on preventing misleading advertising detailed below, the guidance may also be relevant to supers included for the purposes of preventing harm (e.g. product safety warnings).</p>	
<p>1.3 The guidance assists advertisers and practitioners in ensuring that advertisements using superimposed text are compliant with BCAP Code rules on misleading advertising. In particular, rule 3.11 requires that “qualifications must be presented clearly”; it also directs Code users to this guidance.</p> <p>Practitioners should prepare ads responsibly ensuring that viewers can read all the information presented.</p>	
<p>1.4 Compliance with rule 3.11 and other relevant misleading advertising provisions depends on both the content of the supers and their presentation in the context of the wider advertisement. This guidance focuses primarily on the technical aspects of presenting supers providing a set of technical guidelines that BCAP considers sufficient to ensure that viewers have a reasonable opportunity to read the information contained.</p>	

1.5	<p>Ultimately, it is for the ASA, as the body that enforces the BCAP Code, to decide whether an ad complies with the BCAP Code based on relevant information – including this guidance – and an assessment of the advertisement’s likely impact on viewers. As such, compliance with the guidelines set out below alone does not ensure compliance with the misleading advertising provisions of the Code.</p> <p>The General Principles section below outlines BCAP’s view on how, in general, practitioners should approach the use of supers with appropriate diligence. Subsequent sections deal with different technical issues involved.</p>	
2	Scope	
2.1	<p>Where is the guidance relevant?</p> <p>This guidance applies to advertisements appearing in Ofcom-licensed TV services, including live television and time-shifted channels. The guidance does not apply to:</p> <ul style="list-style-type: none"> • interactive text services; • videotext services; or • other TV-like services, such as video-on-demand, which are not regulated under the BCAP Code. <p>With the exception of the provisions of section 11 below, subtitling access services are also outside scope. Technical standards on the provision of access services are regulated by Ofcom.</p>	<p>1b These Guidelines apply to all text on-screen, which states significant limitations, qualifications or other information that is likely to affect a viewer’s transactional decision. For the purposes of these Guidelines, text includes numbers.</p> <p>1c These Guidelines do not apply to text or videotext services or, with the exception of section 10 (below), to subtitling.</p>
2.2	<p>Types of text appearing on screen</p> <p>TV advertising includes or is broadcast with various types of text; the guidance does not apply to all text appearing on screen during an ad.</p> <p>The main types are:</p> <ol style="list-style-type: none"> a) text superimposed onto an advertisement (usually, at the bottom of the creative); b) text or graphics containing text within the creative of an advertisement itself; and c) subtitling added to the broadcast content as part of an access service. <p>This guidance applies to (a), where supers are added for the purposes of complying with the misleading advertising provisions of the BCAP Code. See section 2.4 below for details of where parts of the guidance apply or are relevant to text included for other purposes.</p>	
2.3	<p>Relevance of other text appearing in a TV advertisement</p> <p>Text or graphics containing text that are included in the main creative of an advertisement are not subject to these guidelines. However, such text is relevant in relation to certain provisions, such as those on calculation of the duration of hold for the supers themselves (see section 8 below). They must also comply more generally with the BCAP Code’s rules on misleading advertising.</p>	

<p>2.4 Superimposed text required by other bodies</p> <p>Statements or other information that the law, statutory regulators and other bodies require in TV ads are not controlled by BCAP rules on misleading advertising. The guidance does not apply to supers added, for example, to make statements about copyright or information included as part of voluntary responsible messaging schemes.</p> <p>Relevant parts of the guidance – mainly, the technical sections 5-10 that seek to ensure legibility of supers – do apply to supers included for the purposes of satisfying the requirements of other statutory frameworks. For example:</p> <ul style="list-style-type: none"> • financial services advertising is regulated under BCAP Code section 14, which includes several mandatory information requirements mirroring provisions of financial services legislation controlled by the Financial Conduct Authority; and • medicines advertising is regulated under BCAP Code section 12, which includes mandatory information requirements mirroring medicines legislation controlled by the Medicines and Healthcare product Regulatory Agency. <p>As with text appearing in the main ad creative, these forms of text are counted for the purposes of duration of hold calculations described in section 8 below.</p>	<p>1d These Guidelines do not apply to statements about copyright or other statements included to assert intellectual property rights.</p>
<p>3 The guidance, the legal framework and ASA decision-making</p>	<p>1 Applicability of Guidelines</p>
<p>3.1 The ASA's interpretation of section 3 (Misleading advertising) of the BCAP Code takes into account the Consumer Protection from Unfair Trading Regulations 2008 (the CPRs).</p> <p>The CPRs require that advertising must not contain misleading claims, or omit material information, to the extent that the advertisements are likely to affect consumers' transactional decisions about products or services adversely.</p> <p>The effect on consumers is considered from the point of view of the average consumer. The average consumer is assumed to be reasonably well-informed, reasonably observant and circumspect. If an advertisement is targeted at a particular group of people, it is considered from the point of view of the average member of that group.</p>	
<p>3.2 The ASA will have regard to this Advertising Guidance in cases involving superimposed text when considering whether a TV advertisement is likely to breach BCAP's misleading advertising rules.</p>	
<p>3.3 Practitioners are cautioned that the guidance is only one consideration in the ASA's decision-making on relevant cases. The ASA will consider both the content of supers and their visual presentation within the context of the wider advertisement. This guidance focuses primarily on the technical aspects of presentation such as text size and duration of hold. It provides a set of guidelines that BCAP considers sufficient to ensure that viewers have a reasonable opportunity to read the information presented. However, it does not cover the substance of what information must be included to satisfy the requirements of the BCAP Code. As such, presentation of supers in line with this guidance might still breach the Code, if their content is likely to mislead, either of itself or in the context of its presentation as part of the ad as a whole.</p>	
<p>3.4 The guidance may be revised as a result of ASA rulings and changes in the industry.</p>	

3.5	<p>This Advertising Guidance recommends an approach to presenting information through superimposed text that BCAP considers likely to be acceptable. For the avoidance of doubt, it does not proscribe other approaches, nor is it intended to stifle innovation.</p> <p>If complaints are received about a TV ad in which advertiser has chosen to depart from the approach recommended, the ASA will expect the advertiser to justify why an advertisement does not mislead as a result.</p>	
4.	General principles	2 General principles
4.1	<p>BCAP Code rule 3.11 requires that qualifying information “must be presented clearly” and refers TV broadcasters to this guidance to assist them in ensuring that superimposed text complies with the Code.</p> <p>The aim is to achieve a level of legibility that will enable an interested viewer, who makes some positive effort, to read all the information contained in the supers. The general principles in this section are intended to complement the more specific, technical guidance in the sections that follow in order to achieve this aim.</p>	2c Rule 3.11 of the UK Code of Broadcast Advertising requires that qualifying information “must be presented clearly” and refers TV broadcasters to this guidance to help them to ensure the superimposed text complies with the rule. The aim is to achieve a standard of legibility that will enable an interested viewer, who makes some positive effort, to read all text messages. Sections 4-8 (below) indicate the minimum standards with which relevant text must comply.
		3 Amount and communicability of text
4.2	<p>TV advertising is inherently limited by time and space. Viewers can only reasonably be expected to absorb information if it is conveyed clearly. The use of superimposed text should therefore be kept to a minimum.</p>	3a In the interests of clarity of communication to viewers, text in conventional television advertising should be kept to a minimum [...]
4.3	<p>Long or otherwise complex superimposed text – even if it follows many of the guidelines laid out in the sections below – is likely to be more difficult for viewers to understand, heightening the risk of them being unable to read it. In such cases, the ASA may conclude that the advertisement, taken as a whole, does not comply with the Code.</p>	3a [...] Where messages are long, complicated or obscurely expressed it will be unrealistic to expect viewers to be able to absorb them, even if the text does otherwise meet the technical requirements in these guidelines. In such cases the ASA may still conclude that the advertisement, taken as a whole, does not comply with the Code
4.4	<p>Where appropriate, superimposed text may be used to:</p> <ul style="list-style-type: none"> • expand or clarify a claim; • make qualifications; • resolve minor ambiguities; or • state necessary terms and conditions. <p>Examples of these uses include:</p> <ul style="list-style-type: none"> • clarifications (e.g. “car model X with feature Y shown”); • qualifications of a product characteristic or depiction (e.g. “sequence shortened”); • promotional terms (e.g. “closing date 31 August”); or • conditions of an offer (e.g. “excludes NI stores”). <p>Where a qualification is particularly significant – because it is very important to viewers’ understanding of a claim in the main creative – other measures should be taken to place emphasis on it. For instance, by:</p> <ul style="list-style-type: none"> • amending the main claim to make it easier to understand; • including the relevant qualifier in the main ad creative; • using the voice-over to further draw viewers’ attention to it; and/or • using a longer recognition period when calculating the duration of hold. <p>BCAP acknowledges that there are a variety of different approaches to achieving this and that these will vary dependent on the information being conveyed and the wider context of the ad. Practitioners should nevertheless expect that, at a minimum, the ASA is likely to expect them to demonstrate that they have taken steps, such as those listed immediately above, to bring particularly significant qualifying information to viewers’ attention.</p>	2b Superimposed text may be used to expand or clarify an offer or to make minor qualifications. It may also be used to resolve minor ambiguities. Superimposed text that flatly contradicts a claim made elsewhere in the advertisement is not acceptable.

	Qualifications that go so far as to contradict a claim made elsewhere in a way that is likely to mislead are not acceptable.	
		<p>2a The principal offer and any important qualifications to it should not normally appear only in the form of superimposed text.</p> <p><i>Note: This does not preclude the use of text as the only or the primary vehicle for the selling message. However, where for creative reasons an advertiser chooses to use text in this way it must comply with the minimum standards contained in these guidelines.</i></p>
4.5	<p>Broadcasters and Clearcast, which acts on their behalf to pre-clear TV advertising, should seek to identify and challenge any proposed superimposed text that appears excessively long or complex. They should seek appropriate improvements, for instance:</p> <ul style="list-style-type: none"> • modification of the headline claim to reduce the need for qualification through superimposed text; • removal or modification of words or phrases that are not simple and direct; • breaking messages down into shorter, more viewer-friendly phrases or sentences; and • removal of words, phrases or sentences that serve no essential purpose but might detract from more important information in the superimposed text or ad creative more generally. <p>Additional guidelines on viewer understanding and the complexity of text are included in section 7 below.</p>	<p>3b Broadcasters should accordingly use their judgement to identify and challenge any proposed text that appears excessively long, obscure or complex. They should seek appropriate improvements e.g. modification of basic copy to reduce the need for qualifications in text, breaking messages down to shorter, more reader-friendly chunks, and the elimination of language that is not simple and direct or material which serves no essential purpose but might detract from more important text. For additional guidance on complexity of text, see section 9 II (below).</p>
Technical guidance		
5.	Size of text	4 Size of text
5.1	<p>Principle</p> <p>Supers should be of sufficient size to be legible to viewers.</p>	
5.2	<p>Measurement</p> <p>The size of supers is the vertical height of the text measured in terms of the number of television lines it occupies. In checking text size pre-transmission, allowance must therefore be made for any picture compression effects.</p> <p>Appendix 2 below provides a detailed outline of the method.</p>	<p>(4) Text size is the vertical height of the text measured in terms of the number of television lines it occupies. There is at present no generally accepted standard for measuring character size on character generators and where monitoring is necessary the TV lines must therefore be physically counted (see Appendix 2).</p> <p><i>Note: Regulatory judgements on text size will be made as far as possible on the advertisement as transmitted and thus as seen by the viewer. In checking text size pre-transmission, allowance must therefore be made for any picture compression effects arising from wide screen formats. In practice this means that, where transmission is likely to be in the 'letterbox' format, tapes of commercials where text height is to be measured should be pre-letterboxed.</i></p>
5.3	<p>Treatment of upper and lower-case letters</p> <p>Line height of upper or lower-case letters is measured where possible using flat-topped letters (e.g. 'v', 'w' or 'x'). In letters with risers (e.g. a lower case 'd') or descenders (e.g. a lower case 'p') the risers and descenders do not count for the purposes of measuring line height. Letters curved at top and bottom (e.g. 'c', 'e' or 'o') should not be used when measuring line height.</p>	<p>4d Line height of upper or lower case letters is measured where possible using flat-topped letters such as 'v', 'w' or 'x'. In letters with risers or descenders (e.g. lower case 'd' or 'p') the risers and descenders do not count for the purposes of measuring line height. Letters curved at top and bottom (e.g. 'c', 'e' or 'o') should not be used as the measure of line height.</p>

<p>5.4 Full-strength lines</p> <p>In measuring line height, only full-strength lines are counted. For aesthetic reasons, some text is given what may be described as 'bevelled' edges where the individual letters tail off rather than have a sharply defined edge. There is also a technical device applied to some material that seeks to minimise the flicker that is a feature of the television system (known as 'anti-aliasing'). Round-topped letters such as 'o' can often give a similar effect.</p> <p>In all these cases, the effect is to produce television lines at the top and/or bottom of letters that are noticeably weaker and less distinct than the rest of the letter. These lower amplitude lines are disregarded for the purposes of calculating line height.</p>		<p>4e In measuring line height only the full strength lines are counted.</p> <p><i>Note: For the purposes of 4(e), note that some text is for aesthetic reasons given what may be described as a 'bevelled' edge where the individual letters tail off rather than have a sharply defined edge. There is also a technical device applied to some material that seeks to minimise the flicker that is a feature of the television system (known as 'anti-aliasing'). Round-topped letters such as 'o' can often give a similar effect. In all these cases the effect is to produce television lines at the top and/or bottom of letters that are noticeably weaker and less distinct than the rest of the letter (they are shown at 'lower amplitude'). For the purposes of calculating line height these lower amplitude lines are disregarded.</i></p>
<p>5.5 Line heights</p> <p>The preferred minimum heights for supers in TV advertisements are given in the following table.</p> <p>[See full version for table graphic]</p>		<p>4b The preferred minimum heights of on-screen text in TV advertisements made in different formats are given in the following table.</p> <p>[See full version for table graphic]</p>
<p>5.6 SD to HD conversion</p> <p>30 HDTV lines are proportionally equivalent to 16 SDTV lines, based on the calculation $(16 \div 576) \times 1080 = 30$. 26 HDTV lines are proportionally equivalent to 14 SDTV lines, based on the calculation $(14 \div 576) \times 1080 = 26.25$, rounded down to 26.</p> <p>Those calculations are based on viewing an HDTV set with 1080 horizontal lines; regardless of the HDTV format in which an advertisement is made, character heights should reflect the heights quoted in the table when the picture is scaled to 1080 lines.</p>		<p>4b [1] 30 HDTV lines are proportionally equivalent to 16 SDTV lines, based on the calculation $(16 \div 576) \times 1080 = 30$. 26 HDTV lines are proportionally equivalent to 14 SDTV lines, based on the calculation $(14 \div 576) \times 1080 = 26.25$, rounded down to 26. Those calculations are based on viewing an HDTV set with 1080 horizontal lines; regardless of the HDTV format in which an advertisement is made, character heights should reflect the heights quoted in the table when the picture is scaled to 1080 lines.</p>
<p>5.7 Non-European scripts</p> <p>The standard set out in this section is predicated on the use of European script where word recognition is to a significant extent influenced by the recognition of exterior word and letter shapes. Some foreign language channels may use pictographic and ideographic scripts. These often contain more information within the individual characters. In BCAP's view the size of text for such languages should be greater. However, in the absence of research in this area, no firm guidance on the amount by which size should be increased can be offered.</p> <p>A rule of thumb judgement, based on looking at dual language texts in print, suggests that an increase of two SDTV lines (for a standard of 18 lines and a minimum of 16 lines) and an increase of four HDTV lines (for a standard of 34 lines and a minimum of 30 lines) is likely to suffice.</p>		<p>(4) General Note: The standard set out in this section is predicated on the use of European text where word recognition is to a significant extent influenced by the recognition of exterior word and letter shapes.</p> <p>BCAP is aware that in pictographic and ideographic languages some information is contained within the individual characters. This suggests that for such languages text size should probably be greater. However, in the absence of any knowledge of research in this area no firm guidance on the amount by which size should be increased can be offered.</p> <p>A rule of thumb judgement, based on looking at dual language texts in print, suggests that an increase of two SDTV lines (for a standard of 16 lines and a minimum of 14 for 4:3 SDTV format and a standard of 18 lines and a minimum of 16 lines for 16:9 SDTV format) and an increase of four HDTV lines (for a standard of 34 lines and a minimum of 30 lines) would suffice.</p>
<p>5.8 Commercial breaks appearing in split screens</p> <p>Broadcasters can 'split' the screen to include a commercial break alongside programming content. For example, some sports programming includes updates on live events that appear around the commercials and thereby reduce the size of the screen. In such instances, broadcasters should use their judgement when scheduling advertising to avoid instances where significant use of supers that would otherwise comply with this guidance and the Code might cause problems for viewers.</p>		

6	Format and legibility of text	9I	Legibility
6.1	<p>Principle</p> <p>The text used in supers should be legible to viewers both in terms of how it is presented and how it interacts with the visual content of the main ad creative.</p>	(9I)	<p>The following points are also important for achieving clearly legible and comprehensible text. Departure from these principles will not automatically make an advertisement unacceptable but may be taken into account if there is doubt about the standard achieved.</p>
6.2	<p>Typeface</p> <p>Supers should be presented in a way that is easily familiar to viewers, adhering to the following:</p> <ul style="list-style-type: none"> Supers should use a plain typeface. Text that has a compressed or vertically 'stretched' appearance making it difficult for viewers to read should be avoided. Ornate, heavily serified, italic typefaces and the like should be avoided. Text should be in lower-case with upper-case used only where normal for punctuation and in words or abbreviations that are commonly capitalised. Unconventional use of upper-case text is acceptable in circumstances, for instance, where it is specifically required by legislation or to comply with other requirements of regulatory bodies like the financial services regulator. 	9I d	<p>Ornate, heavily serified, italic typefaces and the like should be avoided.</p>
		4a	<p>Text must be in lower-case with upper-case used only where normal for punctuation and in words or abbreviations commonly capitalised.</p> <p><i>Note: Guideline 4(a) does not apply where text is required to be in some other specified form. These circumstances are likely to be limited to either a legal requirement (e.g. by reason of a statutory regulation) or to comply with the rules of a self-regulatory body (e.g. a financial services regulator).</i></p>
6.3	<p>Spacing</p> <p>The visible space between words should be greater than the visible space between letters and the visible space between lines should be greater than the visible space between words. Fully justified and proportional text should be avoided.</p>	9I e	<p>The visible space between words should be greater than the visible space between letters and the visible space between lines should be greater than the visible space between words. For this reason fully justified and proportional text should not be used.</p>
6.4	<p>Background</p> <p>The visual interaction of supers with the main ad creative can cause them to become unclear. Broadcasters should ensure that appropriate steps are taken to avoid this, such as:</p> <ul style="list-style-type: none"> The contrast between supers and the background, whether in terms of colour contrast or relative brightness, must be sufficient to permit the text to be clearly legible. Certain colour combinations are unlikely to produce readable text and should be avoided. Appendix 3 includes lists of combinations likely to be acceptable and those that should be avoided. As a rule of thumb, 'light-on-light' combinations (e.g. whites and greys) are unlikely to be acceptable. Where the background ad creative distorts the text or might otherwise be distracting for viewers (for example, when it is moving or cuts from one view to another or where it results in more than one colour contrast between the supers and the background) creative approaches should be adopted to create an appropriate level of contrast, for example: <ul style="list-style-type: none"> using bold text in the supers; and/or changing the contrast of the part of the ad creative behind the supers. If an effective creative approach-based solution cannot be found, the supers should be placed on an opaque single-coloured block or band at the bottom of the screen (the lower portion of a letterbox). Supers presented in a block or band should have a clear margin in relation to the main ad creative (all around a block or above a band at the bottom of the screen). Anything less than 6 lines above and below the super is unlikely to be adequate. A sensible approximation of 6 vertical lines must be used horizontally at the ends of the block. 	9I a	<p>The contrast between text and its background, whether in terms of colour contrast or relative brightness, must be sufficient to permit the text to be clearly legible.</p>
		9I c	<p>Certain colour combinations are unlikely to produce readable text and should be avoided (see Appendix 3 below). Note also that the PAL television system tends to give coloured text a 'fuzzy' edge and that the use of coloured text, particularly against certain other coloured backgrounds, needs to be treated with care.</p>
		9I b	<p>Where the background to text may be distracting (e.g. when it is moving or cuts from one view to another) it will normally be necessary to place the text on an opaque single-coloured block.</p>
		4c	<p>Where the typeface, letter spacing, line spacing, background or other element of presentation, including interaction with the background, renders the text blurred or otherwise indistinct, it must be placed on an opaque single-coloured block with a clear margin all round the text, or otherwise amended (see also Guideline 9 I(b) below).</p> <p>Notes:</p> <p>i) To achieve the 'clear margin' referred to in Guidelines 4(b) and 4(c) it is unlikely that anything less than 6 lines above and below the text will be adequate. A sensible approximation of 6 vertical lines must be shown horizontally at the ends of the block.</p> <p>ii) Shading or edging of individual letters or words is not an acceptable alternative to the use of blocks (see Guideline 9 I(h) below).</p>

6.5	Edging and shadowing	9I h	Individual letters are sometimes 'edged' to make them stand out from the background. However, applying edging to small text can have the opposite effect and result in blurring. A similar problem can occur when applying shadow effects to type. These effects should be used sparingly and with care. Edging or shadow effects are not acceptable as substitutes for background blocks as required under 4(c) above.
<p>Individual letters are sometimes 'edged' to make them stand out from the background. However, applying edging to small text can have the opposite effect and result in blurring. A similar problem can occur when applying shadow effects.</p> <p>In improving the contrast between supers and their background in the main ad creative, practitioners are cautioned that these effects should be used sparingly and with care; edging or shadowing effects are not acceptable as substitutes for background blocks or bands as described under 6.4 above.</p>			
6.6	Fading	9I f	Fading text in and out of vision should be used sparingly. The text will by definition be at less than optimum visibility and brightness or contrast for a part of its time on screen and in marginal cases only the time when it is at optimum will be counted.
<p>Fading supers in and out of vision should be avoided. Such text will inherently be at less than optimum visibility for a part of its time on screen. If it is used, only the time when it is at optimum visibility will be counted for the purposes of duration of hold calculations.</p>			
6.7	Position and orientation	9I g	Text shown sideways, at an angle or distorted in any way, such as by being wrapped round a real or virtual object in the commercial, should be avoided.
<p>The optimal position for supers is centred at the bottom of the creative. Viewers are less likely to anticipate supers appearing in other parts of the screen making them harder to read. Text shown sideways, at an angle or distorted in any way, such as by being wrapped round a real or virtual object in the commercial, should be avoided.</p>			
		8	Position of text on the screen
6.8	Screen parameters	(8)	<p>Text positioned so that it is likely to be wholly or partially obscured or distorted at any edge of the picture area of 16:9 television display is unacceptable.</p> <p>There is now only one caption safe area defined for 16:9 commercial material for UK transmission (see EBU R95-1 for further details). All essential action should take place inside the 16:9 action safe area and all graphics and text should be framed within the 16:9 caption safe area.</p> <p>The graphic below is an illustration of the action safe area and caption safe area in the HD environment.</p> <p><i>[See diagram in full version]</i></p> <p>There is now only one caption safe area defined for 16:9 commercial material for UK transmission (see EBU R95-1). All essential action should take place inside the 16:9 action safe area and all graphics and text should be framed within the 16:9 caption safe area.</p> <p><i>[See diagram in full version]</i></p> <p>The graphic above is an illustration of the action safe area and caption safe area in the HD environment.</p>
7.		Viewer understanding	
7.1	Principle	(9II)	<p>Complexity is a significant bar to the understanding of on-screen text.</p> <p>Complexity is a significant bar to understanding superimposed text. Advertisers and practitioners, along with broadcasters and Clearcast when clearing ads for broadcast, should take all steps to ensure that supers are kept to a minimum and are as straightforward and simple as possible.</p> <p>There are two kinds of complexity, that of the offer itself and the way the offer is presented. The two elements are closely related but these guidelines are targeted primarily at the second, the communication of the message.</p> <p>The following guidelines indicate the kinds of things Ofcom licensees should consider when assessing text in advertisements submitted for approval.</p>

7.2	<p>Unnecessary text</p> <p>Broadcasters and Clearcast should not accept an advertiser's assertion that specific text is required for legal or other reasons. In BCAP's experience, this is not always the case; advertisers' legal advisors may sometimes be excessively cautious.</p> <p>Broadcasters and Clearcast should use their judgement to identify circumstances where advertisers should be asked to provide an appropriate justification of the inclusion of a piece of text in supers.</p>	911 a	<p>Licenses should not accept without further question any advertiser's assertion that specific text is legally required. In BCAP's experience this is by no means always the case and advertisers' legal advisors may sometimes be excessively cautious.</p>
7.3	<p>Words to avoid</p> <p>Some types of word to be avoided as far as possible because they are not quickly recognisable and are therefore processed slowly by viewers. For example:</p> <ul style="list-style-type: none"> • unfamiliar words; • jargon words; • legalistic words; • long words; • less common abbreviations; and • proper nouns. 	911 b	<p>Some types of word to be avoided as far as possible because they are not quickly recognisable and are therefore processed slowly are:</p> <p>unfamiliar words; jargon words; 'legal' words; long words; abbreviations; and proper nouns.</p>
7.4	<p>Sentence structure</p> <p>Sentences should be:</p> <ul style="list-style-type: none"> • short, contained on one line; and • simple, containing one key idea, with no subordinate phrases or clauses. 	911 c	<p>Sentence structure is another key element. Sentences should be:</p> <p>i) short – contained on one line; and ii) simple – containing one key idea, with no subordinate phrases or clauses and no jargon or legalistic phrases.</p>
7.5	<p>Length of text</p> <p>As a general principle, the longer supers are, the greater the burden on viewers in reading them. This is likely to increase the risk of supers either being in breach or contributing to a breach of the misleading advertising rules of the BCAP Code.</p> <p>The following points should be considered:</p> <ul style="list-style-type: none"> • Practitioners should take all reasonable steps to ensure the length of text is kept to a minimum. • Large blocks of text are likely to deter a viewer from even attempting to read the contents. • Supers that take up a full line length tend to be harder to read for viewers than the same information presented in two shorter lines. • Supers that take up more than two full length lines are likely to necessitate higher requirements for both size of text and duration of hold: <ul style="list-style-type: none"> ○ a minimum size of at least 16 lines; and ○ a hold duration of at least 4 words per second in addition to the recognition period. • In reducing the amount of text, whole phrases or sentences should be considered for removal before individual words. The removal of individual words can often make supers more difficult to read because they become fragmented. A longer text that is a proper sentence with all the words in place can sometimes communicate better and more quickly than a shorter one with words removed. 	911 d	<p>Length of text is the third key element.</p> <p>i) Large blocks of text are likely to deter a viewer from even attempting to read the contents. As a rule of thumb any text that takes up more than three full-length lines is likely to require higher than the minimum standards for both size and duration of hold. In such cases, the ASA and BCAP may require a minimum size of at least 16 lines and a hold duration of at least 4 words per second in addition to the recognition period. Placing the text on a mono-coloured block might be an alternative or additional remedy in cases where the type of background did not already indicate this.</p> <p>ii) In reducing the amount of text whole sections should be considered for removal before individual words. The removal of individual words can often make text difficult to read because it becomes fragmented. Thus a longer text that is a proper sentence with all the words in place can sometimes communicate better and more quickly than a shorter text with words removed.</p>

7.6	Layout of text	9II e	<p>The layout of text is a fourth key element. Where large amounts of text are unavoidable, the way it is presented on screen can help viewers to read it.</p> <p>i) Within blocks of text, line endings should coincide with the ends of sentences or phrases. ii) Separate captions should be placed as close as practicable to that part of the advertisement to which they refer.</p> <p>Where a qualifying text is divorced from the claim it qualifies (e.g. where the super is at the beginning and the claim at the end of the advertisement) the ASA may consider this as a material factor in determining the acceptability of the advertising.</p>
<p>Supers should be arranged so as to maximise the opportunity for viewers to understand the information contained in them.</p> <p>Where qualifying information is divorced from the claim it qualifies (e.g. where the super is at the beginning and the claim qualified at the end of an advertisement), the ASA may consider it material factor in determining the acceptability of the advertising.</p> <p>Where large amounts of text are mandated (for instance, because of statutory requirements), the way it is presented can help viewers to read it, for example:</p> <ul style="list-style-type: none"> • Within blocks of text, line endings should coincide with the ends of sentences or phrases. • Separate supers should be placed as close as practicable to that part of the advertisement to which they refer. 			
7.7	Competition with other ad messages		
<p>In many instances, viewers are less likely to be able to read and understand information contained within supers when it is competing with other information – in particular, other text – presented in the main ad creative. This is likely to be mitigated by the information presented in the super being closely related to the messages of the main ad creative.</p> <p>Practitioners should ensure as far as possible that supers relate closely to the information and messages of the main creative to maximise viewers' opportunity to read and understand them.</p>			
7.8	Numbers and calculation		
<p>Large amounts of numerical information can frustrate viewer understanding. Practitioners should avoid supers with multiple pieces of complex numerical information (e.g. information on a monthly price, contract length, delivery charges and activation fees for a service). Spreading such information over a number of supers is more likely to be acceptable.</p> <p>Ordinarily, supers that require viewers to make additional calculations are unlikely to be acceptable. This is unlikely to apply to commonly understood information (e.g. price indications) such as stating only the monthly price of a 12-month contract.</p>			
8.	Duration of hold	5	Duration of hold
8.1	Viewers must be given an appropriate length of time to read superimposed text. This part of the guidance outlines a method for establishing the duration of hold in the context of a particular ad.		
8.2	In general, supers should be held for a duration calculated at the rate of 5 words per second (i.e. 0.2 seconds per word or 300 words per minute).	5a	Text must be held for a duration calculated at the rate of 5 words per second (i.e. 0.2 seconds per word).
8.3	<p>An additional 'recognition period' should be added to the duration of hold calculated. Where the supers concerned contain:</p> <ul style="list-style-type: none"> • 9 words or fewer, the recognition period is 2 seconds; and • 10 words or more, the recognition period is 3 seconds. <p>Additionally, in conjunction with section 4.4 above, where qualifying information in a super is particularly significant practitioners should use a longer than recognition period than those above (at least an additional 2 seconds) to create a greater window for viewers to absorb the information presented.</p> <p>See Appendix 1 for a table of hold durations.</p>	5b	<p>Additionally: Where the text concerned contains 10 words or more, an additional 'recognition period' of 3 seconds must be added, or 2 seconds if the text contains 9 words or less (see Appendix 1 for a table of hold durations and also Guideline 9II (d) below).</p>

9. Combined effects	
9.1	<p>The factors influencing readability of supers outlined in section 4-8 above can work in combination to frustrate viewers' attempts to read and understand them. Practitioners are cautioned that the ASA will consider the factors individually and cumulatively when investigating complaints.</p> <p>One action that BCAP recommends to mitigate this risk is to ensure that supers are presented with appropriate contrast from the background creative as per section 6 above.</p>
10. Short ads or shortened versions	
10.1	<p>Advertisers sometime create deliberately short commercials or shortened versions of longer commercials. These inherently limit the available time and space for supers to be displayed. Advertisers should exercise caution in such circumstances to ensure their ads still conform to the approach outlined above.</p>
11. Subtitling	10 Subtitles
11.1	<p>The following additional points should be borne in mind when advertisements are to be subtitled in the form of text for the hearing impaired.</p>
11.2	<p>When positioning subtitling on the screen care must be taken to avoid obscuring any visual, including other forms of text, that is material to the offer.</p>
11.3	<p>Care should be taken in paraphrasing the audio for text transmission that no essential consumer protection or information material is lost or any misleading impression given relating to the offer.</p> <p>Note: Further guidance on the use of subtitling is available from the Ofcom Television Licensing and Planning Group.</p>
	<p>(10) The following additional points should be borne in mind when advertisements are to be subtitled in the form of text for the hard of hearing accessed through page 888 on the public teletext service.</p>
	<p>10a When positioning subtitling on the screen care must be taken to avoid obscuring any visual, including other forms of text, that is material to the offer.</p>
	<p>10b Care should be taken in paraphrasing the audio for text transmission that no essential consumer protection or information material is lost or any misleading impression given relating to the offer.</p> <p>Note: Further guidance on the use of subtitling is available from the Ofcom Television Licensing and Planning Group.</p>
	<p>[See full version for the Annexes]</p>
	<p>[See full version for the Annexes]</p>

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