

Captioning Policy Statement and Associated Guidance (July 2024)

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1. Introduction

This document sets out the legal requirements for the presentation of pre-recorded video to end-users, based on the 2018 Digital Accessibility Regulations¹. It then draws on advice from the University's Legal Services team in setting out an institutional policy on captioning for staff to follow. It is important to note that the captioning policy focuses on pre-recorded media created by staff. It does not address captioning requirements for scheduled ('opt out') automated lecture recordings supported by the Replay service, which are tackled in a separate guidance document on [captioning lecture-capture recordings and 'live' teaching](#).

The guidance in this document applies to all staff who publish pre-recorded video to end-users online, and covers conventional teaching activities, as well as staff development, CPD delivery and general web communication activity, which are all subject to the 2018 Digital Accessibility Regulations.

Module leaders or the lead person responsible for the delivery of the VLE site are accountable for all pre-recorded video content and must ensure that this content meets the legal requirements set out in the policy document.

¹ This is also now being referred to as the Public Sector Bodies Accessibility Regulations.

2. Legal context to the Captioning Policy

What do the 2018 Digital Accessibility Regulations say about our obligations to end-users in the presentation of pre-recorded video to end-users?

2.1 The Digital Accessibility Regulations

As a public sector body, the University is subject to the [2018 digital accessibility regulations](#)[1]. Intranet content (including pre-recorded video) published on or after 23rd September 2019 already had to comply with the digital accessibility regulations. Recorded videos, such as lecture capture recordings published from 23rd September 2020 also now need to comply with the regulations - i.e. to [WCAG 2.2 level AA](#) from October 2024[2]. (Source: Gov.UK. Central Digital and Data Office. [Guidance: Understanding accessibility requirements for public sector bodies](#))

Government guidance on how video should meet WCAG 2.2AA standards is available in a range of ways - e.g.:

- [WCAG 2.2 Guidelines](#) have been published for content authors to follow: Captions are provided for all pre-recorded audio content in synchronised media, except when the media is a media alternative for text and is clearly labelled as such. (Success Criterion 1.2.2)
- specific [GOV.UK guidance on publishing video](#) also states that: 'To make sure videos are accessible, **add closed captions and transcripts so that users accessing the video without audio can read all of the content**'. The combination of captions and a transcript reflects 'best practice'.

2.2 Legal requirements for pre-recorded video content

The legal requirements for the accessible presentation of pre-recorded video are set out in the Gov.uk Service Manual:

[Accessibility and assisted digital: Understanding WCAG 2.2](#)

Video content like instructional videos, promotions and interviews, must have captions that are synchronised with the audio content of the video. This ensures that the information communicated by the audio part of the video is available to people who cannot hear it.

Requirements / What to do?

- All video content has captions that are synchronised with the audio content of the video;
- Captions include all the spoken dialogue and important sound effects from the audio part of the video.

Common mistakes

- The video does not have synchronised captions;

- The video has captions but they do not include all the spoken dialogue and important sound effects from the audio content of the video;
- The video has captions but they are not synchronised with the audio content of the video.

2.3. Legal interpretation of WCAG 2.2 item 1.2.2 (captions for pre-recorded video)

The University's Legal Services team has provided the following interpretation of our legal obligations under item 1.2.2. of the WCAG 2.2AA standards:

- 1.2.2 requires that captions are provided for all pre-recorded audio content in synchronised media (i.e. a resource combining a number of different outputs that are integrated together) such as video. This ensures that the information communicated by the audio part of the video is available to people who cannot hear it;
- providing automated captions immediately when a recording is uploaded is reasonable given that lectures can be considered "time sensitive" in terms of the importance for students as they progress through a module;
- the ability for students to request a 'bespoke' correction service is also reasonable although this does delay full accessibility for hearing impaired students;
- there is no legal requirement for a transcript to be provided in addition to closed captioning; WCAG 2.2AA refers to this as 'best practice' rather than a minimum requirement that all public bodies should meet.

3. Captioning policy for Pre-Recorded Video at the University of York

Drawing on the legal context and guidance that we have received from the University's Legal Services team, we present here the following captioning policy for pre-recorded video.

3.1 Introduction to the Policy

It is a legal requirement for all pre-recorded video to meet the requirements of the [2018 Digital Accessibility Regulations](#). This policy sets out the requirements that all staff should address in their handling of video to comply with the regulations.

The policy relates to the following forms of video:

- Pre-recorded video resources created by a member of staff;
- Video content (e.g. a promotional video) which has been commissioned by a member of staff to be produced by an external organisation;

- Recordings of meetings / teaching encounters which are subsequently made available to staff and students². These include:
 - videos recorded from web conferencing software, such as Class Collaborate (formerly Blackboard Collaborate), Zoom and Google Meet;
 - 'Opt-in' lecture recording bookings for non-lecture activity;
 - recordings generated in on-campus teaching spaces to be used as learning and teaching materials;
 - Links to scheduled Replay recordings from previous academic years, where it is absolutely necessary to reuse legacy scheduled recordings as opposed to creating new recordings of video content under controlled conditions.

This policy statement does not apply to:

- Automated, mass-produced 'opt out' lecture recordings, generated by the Replay lecture recording service. Please note that automated lecture recordings are subject to WCAG 2.2AA regulations and require closed captioning to be in place, but are addressed in a separate guidance document on [captioning lecture-capture recordings and 'live' teaching](#).
- Third-party content/intellectual property (hosted externally - such as on services such as YouTube). There is a clash in terms of intellectual property considerations and accessibility regulations for third-party content and it is unclear how staff could provide closed captions for third-party content without infringing intellectual property rights for external content. We advise that staff avoid linking to external video content which is not compliant with WCAG 2.2AA standards. If it is absolutely necessary to do so, a written summary of the content should be provided as a complement to the video resource.

3.2 Captioning requirements for pre-recorded video

3.2.1: All staff who are engaged in the creation of pre-recorded video content must ensure that accurate closed captions are included as part of that resource. Pre-recorded video may not be published to end-users without closed captioning in place.

3.2.2: Staff are required to review the captions for the pre-recorded video to check that they provide an accurate reflection of the audio content (e.g. presenting technical and discipline-specific language correctly). Checks should be made for offensive or derogatory language appearing in the closed captions, which should be also corrected. Staff are required to respond to requests for corrections to captions from end-users, if errors come to light after the publication of the video resource. Requests for captioning corrections to be

² Please note that the University does not require staff to record meetings, seminars etc., but if a recording is made and released to students then it will be subject to the accessibility regulations and therefore require closed captioning.

made may be communicated to staff directly or through the reporting channel that a teaching department has established and highlighted through its accessibility statement to students.

3.2.3: Videos hosted within Panopto (the University's centrally supported service for delivering video for teaching and learning applications) will automatically receive system-generated closed captions - but these will need to be reviewed by the content author to ensure that they are accurate/intelligible and do not include offensive or derogatory language.

- There are several methods to do this:
 - One is to edit the captions 'in-line' within the Panopto Video Editor
 - Another method is to download the '.srt' subtitle file, edit this wholesale, and re-import it into Panopto
 - Alternatively, staff could use third-party systems such as YouTube or social media platforms to generate captions and then upload them to Panopto. Guidance on how to use third-party systems is available in a [dedicated guide](#) provided by the Marketing Team

The Digital Education Team has provided a dedicated guide for staff on how to correct captions addressing use of the Panopto video editor and this is available in: [Embedding / Editing Captions](#)[5].

Staff are advised to use a headset and microphone within a quiet space under controlled conditions to pre-record video to ensure the best quality audio for the video recording. This will help to generate more accurate closed captioning for the pre-recorded video.

3.2.4: Staff are not required to provide transcripts for pre-recorded video resources, but are encouraged to do so as a supplement to the video resource. This is deemed to reflect good practice.

However, a transcript may be required in circumstances in which the audio capture and captioning do not sufficiently address key information presented in a video (e.g. visual information in a figure or graph which is essential to the understanding of the recording, but not explained by the lecturer in the audio feed), which would not be available to a sight-impaired end-user.

Document control

- Last reviewed - 18 July 2024

[1] Understanding accessibility requirements for public sector bodies:
<https://www.gov.uk/guidance/accessibility-requirements-for-public-sector-websites-and-apps>

[2] Accessibility and assisted digital. Understanding WCAG 2.2:

<https://www.gov.uk/service-manual/helping-people-to-use-your-service/understanding-wcag>

[3] Policy Connect Report:

https://www.policyconnect.org.uk/appgat/sites/site_appgat/files/report/436/fieldreportdownload/appgatreport09-18finalweb.pdf

[4] WCAG 2.2 A – checklist item 1.2.2 captions pre-recorded):

<https://www.w3.org/TR/WCAG22/#captions-prerecorded>

[5] Replay Guide: Embedding / Editing Captions:

<https://docs.google.com/document/d/1eX5K4zg-yl13uYuK6SsMUa-qgiQzG5w5c2zh4rEGKj4/edit>