University of Reading
Captioning and Transcription of Recorded Sessions Policy

Executive summary

1. This document contains **UoR's draft Policy** (still to be approved by DELT and UBTLSE) re use of captioning/transcription in teaching and learning materials to help meet our legal obligations (see Annex 1), and to support students.

2. As of September 2020, all pre-recorded audio/video teaching and learning materials **must** be accompanied by either **auto-captions or transcripts** to meet relevant legal accessibility requirements.

3. Recordings of **'Live' teaching and support events** will be deemed to be 'pre-recorded teaching resources' if they are likely to be/are made available for more than 14 days.

4. For pre-recorded audio/video teaching and learning materials (such as screencasts) staff must only up-load and publish to **University-approved platforms** which provide captions. This is currently **MS Stream**. (See Section 3.2 below.) Do all pre-recording of T&L materials in MS Stream/Teams, where possible.

5. If you are **recording outside of MS Stream or Teams** you must upload the recording to MS Stream, which means it is automatically captioned.

6. In most case, the law does **not require 100% accurate** or human-corrected captions.

7. **Staff are, therefore, not normally required to edit captions** (but see 9. here and 3. 8 below for DAS Reasonable Adjustment exceptions). However, staff are encouraged to check their captions for obvious errors/major inaccuracies and to edit those where found (see Annex 2 for advice on this.)

8. **Student should be advised**, in Programme Handbooks, on Blackboard/ Canvas and in introductory slides/accompanying documentation, **that audio-captioning may not be 100% accurate**. Captions should, therefore, be used in conjunction with other teaching and learning materials. Suggested wording for this is given in Annex 3.

9. In some cases the University's Disability Advisory Service (**DAS**) will have been made aware of **a specific disability**, carried out an assessment and **identified human-corrected captions (or transcripts)** as the necessary **reasonable adjustment** (or one of range of reasonable adjustments) for the University to meet its legal obligations. Where this is the case, and DAS has identified human-corrected captions (or transcripts) as a necessary reasonable adjustment in a student's Individual Learning Profile (**ILP**), staff **must** edit/human-correct automatically generated captions (or transcripts) before publication.

10. Staff are not normally required to provide **transcripts** for pre-recorded audio-visual teaching and learning materials if auto-captions have been provided via MS Stream (subject to the circumstances set out in Section 3.8).

1. Introduction

The University is committed to inclusivity and providing accessible learning to all. This means:
- developing accessible learning tools/materials using appropriate platforms to enable access;
- supporting colleagues in the production of accessible learning materials;
- complying with relevant legal requirements relating to the accessibility of these tools and materials.

This document refers to both Accessibility and Inclusivity:
- **Accessibility** involves creating tools, materials, or resources which are designed to enable users with disabilities to interact with them. A disability might affect vision, hearing, manual dexterity, cognition or reading. A disability may be permanent, temporary or situational.
- **Inclusivity** involves creating equal opportunities for participation for all users wherever possible.

This document has yet to be approved by DELT and UBTLSE, but is being shared now to inform staff practices. Please follow this document in preparing recorded sessions.

2. Purpose and Scope

2.1 This policy sets out the University's approach to Accessibility and Inclusivity and to meeting its legal obligations, specifically in relation to the captioning and transcription of recorded teaching session.

2.2 Accessibility legislation requires that all pre-recorded time-based media made available by public sector bodies on websites (and via mobile apps) need to be made accessible. For more information on the legal context see Annex 1.

2.3 The focus of this policy is on captioning and transcription of pre-recorded audio-visual teaching and learning resources to support their accessibility. Recordings of 'Live' teaching and support events will also be deemed to be 'pre-recorded teaching resources' if they are likely to be/are made available for more than 14 days. The accessibility legislation also applies to other types of pre-recorded audio-visual materials such as public lectures, and to other types of digital tools and materials, but these are not considered within the scope of this Policy.

2.4 This policy does not form part of any employee's contract of employment or any student's contract with the University and it may be amended at any time.

2.5 For the purposes of this policy:
Automated captions are a way for people with a variety of accessibility requirements (such as those with hearing impairments or neurodivergence) to be able to experience

the material. With auto captions all of the dialogue and important sounds are embedded as text in the video track. They do not need to be turned on by users as they are automatically generated. Captions should not be confused with subtitles. Subtitles provide text of only the dialogue and do not typically include important sounds.

Transcripts are a text version of the speech and non-speech audio information needed to understand the content

3. What are the University's Requirements?

3.1 All pre-recorded audio/video teaching and learning materials **must** be accompanied by either auto-captions or transcripts to meet relevant accessibility requirements. This is why staff **must** only upload and publish to University-approved platforms which provide these. As at the start date of this policy, the only University- approved platform for these purposes is Microsoft (**MS**) Stream.

3.2 We advise colleagues to do all pre-recording in MS Stream or Teams, where auto-captioning is automatically produced to the standard required. Once you've uploaded the recording to MS Stream you must actively select a language to ensure captions are then automatically generated.

3.3 Other recording tools may not generate auto-captions, or may not generate auto-captions that meet the requirements of the accessibility legislation (such as requiring captions to synchronise with the audio).

3.4 If you are creating a recording outside of MS Stream or Teams you **must** upload the recording to MS Stream. This will mean that it is auto-captioned.

3.5 In most cases, the law does not require captions to be 100% accurate or human-corrected (subject to the circumstances described in Section 3.8).

3.6 Therefore, staff are not generally required to edit captions, but are encouraged to check their captions for any obvious errors or major inaccuracies and to edit those where found. It is recommended that staff consider the factors set out in Annex 2 in their assessment of the feasibility and proportionality of checking and editing captions.

3.7 Students should be advised that auto-captioning may not be 100% accurate and should be used alongside other teaching and learning materials. See Annex 3 for wording that should be included in Programme Handbooks and on Blackboard/Canvas, and where practicable also within any slides or documentation issued alongside the auto-captioned teaching materials.

3.8 . In some cases the University's Disability Advisory Service (**DAS**) will have been made aware of a specific disability, carried out an assessment and identified human-corrected

captions (or transcripts) as the necessary reasonable adjustment (or one of range of reasonable adjustments) for the University to meet its legal obligations. Where this is the case, and DAS has identified human-corrected captions (or transcripts) as a necessary reasonable adjustment in a student's Individual Learning Profile (**ILP**), staff **must** edit/human-correct automatically generated captions (or transcripts) before publication.

3.9 Staff are not normally required to provide transcripts for pre-recorded audio-visual teaching and learning materials if auto-captions have been provided via MS Stream (subject to the circumstances set out in Section 3.8).

3.10   If a document or other materials appear within a recording but the audio capture and/or auto-captions do not sufficiently capture or address information from those materials then an alternative accessible format may be required. There may be other circumstances where the auto-captions provided don't address a specific accessibility requirement. Following a request from a student, staff **must** provide accessible alternatives for content that doesn't meet a student's accessibility requirements, within a reasonable period of time. For queries about this, staff are encouraged to contact the [University's Disability Advisory Service](#) for information about the student's needs and to contact TEL for information on technology-based solutions.

3.11   If students notify module convenors of errors in captions that materially affect the meaning and understanding of the relevant subject, and have not been reflected correctly in other course materials, relevant teaching staff **must** correct those errors and upload and publish a corrected version of the pre-recorded materials. It would be good practice to ask a colleague to review if in doubt before you publish.

3.12   Pre-recorded audio-visual teaching and learning materials also include podcasts (digital audio files, usually available as a series). These can be created in a range of media apps. Any podcasts created **must** be made available along with a transcript.

4. Additional information and resources
- Staff can access practical guidance here on [captioning and transcription](#).

UoR Teaching and Learning Development Group (drafted by Clare Furneaux)
27 September 2021

Annex 1
Regulatory context

As a public sector body, the University is subject to The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 (**PSBAR**). The University is also bound by a statutory anticipatory duty (under the Equality Act 2010) to ensure that teaching and learning materials are inclusive ('by reasonable means'), and a duty to make reasonable adjustments where a disability is disclosed.

The PSBAR requirements can be met by complying with the WCAG2.1 AA standards (see below for what this means in practice). The Equality Act duty can be met by meeting PSBAR requirements AND by considering/making specific reasonable adjustments for those with disabilities where we have been made aware of their disability and related requirements. The PSBAR also require that, where it is requested, we provide accessible alternatives for content that doesn't meet the PSBAR requirements, within a reasonable period of time.

The Web Content Accessibility Guidelines (known as WCAG 2.1) are an internationally recognised set of recommendations for improving web accessibility.

They explain how to make a digital services, websites, and apps (and the content thereon) accessible to everyone, including users with impairments to their:
- vision - like severely sight impaired (blind), sight impaired (partially sighted) or colour-blind people
- hearing - like people who are deaf or hard of hearing
- mobility - like those who find it difficult to find a mouse or keyboard
- thinking and understanding - like people with dyslexia, autism, or learning difficulties

Pursuant to PSBAR, all pre-recorded time-based media need to be made accessible by making them 'perceivable, operable, understandable and robust'.

Time-based media is defined as "media of one or more of the following types: audio-only, video-only, audio-video, audio and/or video combined with interaction."

The PSBAR do not apply to pre-recorded time-based media produced before 23 September 2020, or to live time-based media. However, any recordings of live time-based media that are likely to be made available for more than 14 days will be deemed to be relevant 'pre-recorded' content and the PSBAR requirements will apply.

WCAG 2.1 is based on four design principles; web content should be:

- perceivable
- operable
- understandable
- robust

The WCAG 2.1 AA standards explain how you can implement these.

This Policy covers captions and transcripts. These tools are one of the ways in which the University can meet WCAG 2.1 Principle 1: Perceivable making sure users can recognise and use your services with the senses that are available to them

Annex 2

We recommend that staff assess the need for human-corrected, higher-accuracy transcripts and/or captions with the following considerations in mind:

- Whether the content is already available in accurate written format e.g.,
  o written notes to support the resource
  o copy of slides available alongside the recording.
- Whether students will be able to use their wider reading of the subject (and/or a recording that includes the audio content) to understand where automated captions/transcripts may have produced errors.
- Where possible, technical terms should be included in text form e.g. in the PowerPoint slides. This will be particularly important for subjects that involve another language (such as Latin), and/or subjects involving specific technical language that may not be recognised by auto-captioning software.
- The impact accurate transcripts and or captions will have on student learning.
- The time and resources available to edit automated transcripts and/or captions.
- The length of the recording.

Please note: you can edit the caption of a screencast you have made in MS Steam any time.

Annex 3

Guidance for students re use of captions

Video captions accompanying pre-recorded videos for online teaching and learning are automatically generated and provided for accessibility purposes. As with any automated speech recognition system, there may be some errors in the speech-to-text conversion process; the captions may not be 100% accurate. Because they are automatically generated, they may not have been checked or edited before being provided to you. You should not, therefore, rely on captions as a sole source of information.

Captions can be used to supplement your learning, but you should cross-reference captions against other sources, such as your course notes, slides from the session, suggested reading lists etc, and contact the lecturer concerned if you have any queries. We recommend that, if one is available, you use a subject-specific dictionary which should help you identify key terms. These are likely to be required in some subjects more than others. Examples include subjects (such as maths and pharmacology) which use specific and technical terminology.

If you believe that captions related to your course include errors that materially affect the meaning and understanding of the relevant subject, and have not been reflected correctly in other course materials, please contact your lecturer and request a corrected version.

VERSION /KEEPER/ REVIEWED /APPROVING AUTHORITY /APPROVAL DATE /START DATE /NEXT REVIEW [TBD]

Version	Keeper	Reviewed	Approved by	Approval date	Effective from
1	AGS	Every year	UBTLSE	3 November 2021	2020/21 academic session