

Accessibility

Subtitling in Finland 2021

Sami Virtanen

Advisor on Accessibility and Digital Services

Finnish Federation of Hard of Hearing

Finnish legislation on subtitling

Umbrella legislation:

The Act on Electronic Communications Services

- Based on EU Audiovisual Media Service Directive.
- **The FIRST** subtitle law came into force in 2011.
- Has been forced from 2011, in 2011 – 2016 there was transition time.
- In 2011 – 2016 public broadcaster percentage was 20 % → 100 % .
Commercial broadcasters` percentages 15 % → 50%

NOW

- Based on EU Audiovisual Media Service Directive.
- Directive was revisioned and approved at EU level in 2018.
- New regulatory and nationality reform on audiovisual media services due to new EU Audiovisual Media Service Directive.
- Finnish Ministry of Communication and Transportation started national regulation progress at the beginning of 2019.

- Now: According to former the Act on Electronic Communications Services
 - Public broadcaster (YLE) is obliged provide subtitle with **100%**
 - Commercial broadcasters (MTV and Channel Four) with **75%**.
- Regulation isn't concerned live sport programmers and live music performances. Video-on-demand subtitle service was on recommendation level.
- **Main challenge:** Channel Four provided automatic subtitles since 2018 autumn. There wasn't any editors who can be checked contents. Quality was poor. FFHOH received number of feedbacks on poor quality.

The Act on Electronic Communications Services NOW!

-
- Ministry coordinated round table talks on its`audiovisual media regulatory proposals and needs of additions with stakeholders.
- These regulates have set up relating to subtitle:
 1. Subtitle quality is recommended.
 2. Video on demand subtitles are more regulatory obliged.
 3. Communication authorities have more obligations to follow up accessibility rules. Authorities have more power and ask for activity and accessibilty development reports from broadcasters.

The Act on Electronic Communications Services NOW!

NEW Demands:

1. Subtitles quality is regulated. Subtitle should be understandable and clear for viewers.
2. Video on demand subtitles are more regulatory obliged. Video-on-demand subtitle services are now regulated, **at least 30 %** of programs should be subtitled each one media broadcasters' platforms.
3. Communication authorities have more obligations to follow up accessibility rules in among with media broadcasters. Finnish Communication authorities have more duties due to stronger legislation. Media broadcasters have to report annually implementend accessibilty actions and what are future plans.

CHALLENGES NEXT TIME PERIOD:

- Regulation does not concern live sport programmers and live music performances. This will be next goal in next time period when technology is advanced.
- Speech to text automatic technology possibilities will increase in Finnish language

Live subtitles - Decree on audiovisual services, including subtitles

Decree by 2021:

- Decree defined live broadcasting with subtitles can be implemented in within 24 hours re-broadcasting programs whether have been broadcasted the first time in live without subtitles.
- Concerning only public broadcaster (YLE), commercial broadcasters don't provide live subtitles.

Decree since 2022:

- LIVE subtitling will be obligatory **in 2022 (next year) and will cover 100 %**.
- This year 2021 will be transition time. This year public broadcaster (YLE) is capable provide live subtitling about 40-50 % of all live programs.
- According to decree, concerning only public broadcaster (YLE). Commercial broadcasters don't provide live subtitles because of lack of knowledges and resources.

Further information:

Sami.virtanen@kuuloliitto.fi