

Regulatory statement: superimposed text

Review of BCAP's guidance on the use of superimposed text in TV advertising

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The UK Advertising Codes are the responsibility of two industry Committees – the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) and are independently administered by the Advertising Standards Authority (ASA).

The Codes require advertisements across media to be legal, decent, honest and truthful, promoting consumer trust in advertising and maintaining fair competition between businesses. The Codes also include additional, sector-specific rules, such as those for alcohol, food and gambling, to ensure responsible advertising and the protection of vulnerable groups in certain sectors.

1. Introduction

Executive summary

Today, the [Broadcast Committee of Advertising Practice](#) (BCAP) is publishing revised guidance on the use of superimposed text.

The use of superimposed text (or “supers”) is a common technique in TV advertising. Supers provide viewers with additional information usually because it is required for legal or regulatory purposes. It is therefore important that the information presented in them is legible and comprehensible to viewers.

The revised guidance responds to the findings of the Advertising Standards Authority (ASA)’s review of the evidence around supers, including new consumer research into viewer use of such text, which is also published today. The ASA’s findings suggest that more needs to be done to ensure that viewers are able to read supers. There are likely to be ads in circulation at the moment that include potentially problematic techniques. Two particular areas of concern are text with poor background contrast and using letters that appear ‘stretched’ or elongated, both of which make supers harder for viewers to read.

The role of BCAP’s guidance is to provide a series of technical recommendations and principles for advertisers to follow. They are intended to maximise the opportunity for viewers to read the information contained in supers.

Revisions to the guidance will set a higher bar in the following areas:

- Particularly significant qualifying information should be given sufficient emphasis; this may include holding certain information on screen for longer.
- 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 a detrimental impact on 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 the information presented.

Supers present a complex enforcement challenge. Legibility and comprehension rely on interplay between a variety of technical factors (e.g. background contrast and size of text) and wider principles (keeping supers to a minimum). Consequently, alongside BCAP’s guidance, the ASA has announced that it will take a correspondingly stricter line when enforcing rule 3.11 of the UK Code of Broadcast Advertising (the BCAP Code).

The changes have a potentially significant impact on advertisers and practitioners across virtually all sectors that advertise on TV. Mindful of this, BCAP and the ASA commit to working together to engage with industry from an early stage to help it implement the changes.

There will also be a two-stage transitional period. The revised guidance will come into effect on 1 March 2019. Initially, the ASA will seek to resolve cases informally, issuing advice based on the guidance to advertisers on how to improve potentially problematic supers. It will start to consider cases formally from 1 September 2019.

2. Background and process

2.1. Broadcast Committee of Advertising Practice

BCAP is the regulatory body responsible for maintaining the UK Code of Broadcast Advertising (the BCAP Code) under agreement with the Office of Communications (Ofcom). Ofcom has a statutory duty, under the Communications Act 2003, to maintain standards in TV and radio advertisements. In 2004, Ofcom entrusted BCAP and the broadcast arm of the ASA with the regulation of broadcast advertisements in recognition of CAP and the ASA's successful regulation of non-broadcast marketing for over 40 years, and in line with better regulation principles.

The BCAP Code regulates all advertisements on television channels and radio stations licensed by Ofcom and all advertisements on Sianel Pedwar Cymru (S4C) and S4C digital, including teleshopping channels and any additional television service (including television text services and interactive television services). The BCAP Code is enforced against Ofcom-licensed broadcasters, S4C and S4C digital. Broadcasters are required by the terms of their Ofcom licence, and, for S4C, by statute, to adhere to the standards set out in the BCAP Code.

BCAP members include broadcasters and trade associations representing advertisers, broadcasters and agencies. BCAP must seek advice on proposed Code changes from an expert consumer panel, the Advertising Advisory Committee (AAC). Under Section 324 of the Communications Act 2003, BCAP must consult on proposed Code changes. BCAP strives to ensure that its rule-making is transparent, accountable, proportionate, consistent and targeted where action is needed, in accordance with the Communications Act 2003. Ofcom must approve Code changes before BCAP implements them. Further information about BCAP and the AAC is available at www.asa.org.uk.

2.2. Advertising Standards Authority

The ASA is the independent body responsible for administering the CAP and BCAP Codes and ensuring that the self-regulatory system works in the public interest. The Codes require that all advertising is legal, decent, honest and truthful.

The ASA assesses complaints from the public and industry. Decisions on investigated complaints are taken by the independent ASA Council. The ASA Council's rulings are published on the ASA's website and made available to the media. If the ASA Council upholds a complaint about an ad, it must be withdrawn or amended.

An Independent Review Procedure exists for interested parties who are dissatisfied with the outcome of a case. CAP conducts compliance, monitoring and research to help enforce the ASA Council's decisions. Information about the ASA is available at www.asa.org.uk.

2.3. Regulatory framework of the BCAP Code

The [Communications Act 2003](#) (the Act) sets out provisions for the regulation of broadcasting and television and radio services, including provisions aimed at securing standards for broadcast advertisements. The most relevant standards objective to the subject of this regulatory statement is:

[319\(2\)\(h\)](#) that the inclusion of advertising which may be misleading, harmful or offensive in television and radio services is prevented.

The Act requires Ofcom to set and, from time to time, review and revise, a Code containing standards for the content of broadcast advertisements carried by TV and radio services licensed under the Broadcasting Acts 1990 and 1996.

Ofcom has contracted out the setting of advertising standards to BCAP under the [Contracting Out \(Functions Relating to Broadcast Advertising\) and Specification of Relevant Functions Order 2004](#). That function is exercised in consultation with and agreement of Ofcom.

2.4. Misleading advertising and superimposed text

Section 3 (Misleading advertising) of the BCAP Code requires that ads must not materially mislead or be likely to do so. Additionally, rule 3.10 requires that “ads must state significant limitations and qualifications” to a headline claim, and rule 3.11 requires that “qualifications must be presented clearly”.

The ASA’s interpretation of these rules takes into account the [Consumer Protection from Unfair Trading Regulations 2008](#) (CPRs). The CPRs require that advertising must not contain misleading claims, or omit material information, to the extent that the advertisements are likely to affect adversely consumers’ transactional decisions about products. 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.

The use of superimposed text – often referred to as “supers” – is a common technique in TV advertising. Supers provide viewers with additional information, usually because it is required for legal or regulatory purposes, for example, to clarify limitations to and qualifications of a headline claim. Although supers are only one part of a wider ad creative, they can be important in ensuring that consumers have the necessary information to avoid being misled by claims, whether visual or spoken, in the main creative of the ad.

2.5. Regulating supers

BCAP Code rule 3.11 also directs readers to BCAP’s existing guidance, [Guidance on on-screen text and subtitling in TV advertisements](#). It sets out various principles and recommended technical standards to assist advertisers and practitioners in complying with the rules on misleading advertising. It plays an important part in such decisions, but, ultimately, it is for the ASA to decide whether supers are of themselves misleading or contribute to the wider ad being misleading. The guidance does not seek to provide an all-encompassing guide to the substance of information required for a given ad.

The guidance was developed by the Independent Television Commission (ITC), the regulator of TV advertising from 1991 to 2003. The ITC commissioned a dedicated review of the evidence upon which the guidance was developed. Black (1991), *Presenting supers in television advertisements: factors influencing their perception and comprehension* 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). It 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 body of evidence identified, 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 ASA considers complaints about TV ads involving supers periodically. In assessing compliance with the BCAP Code, it has regard to BCAP's guidance. There are relatively few cases where complainants specifically cite concerns about the supers themselves. However, information contained in the supers is often relevant to the interpretation of claims in the main ad creative. Although complaint levels have not been significant, the ASA has published rulings on such matters on a reasonably frequent basis. Over the past five years, the ASA has taken action involving supers in 80 cases.

It is the responsibility of advertisers and agencies or other practitioners acting on their behalf to create ads that comply with the BCAP Code. The guidance is an important tool and reference point for such practitioners. Much of the work to check supers' conformity with the Code and BCAP's guidance is carried out by [Clearcast](#), the body that works on behalf of the broadcasters to pre-clear nearly all TV advertising before it is broadcast.

2.6. BCAP guidance review and ASA research commission

In late 2016, BCAP published a minor technical update to the guidance to reflect changes in broadcast technology. During this piece of work, BCAP identified several areas of concern over how the guidance was being interpreted by practitioners, Clearcast and the ASA. Potentially problematic techniques from a legibility perspective, such as the use of elongated or compressed text, were present in some TV advertising. At the same time, the ASA committed to developing research on the way qualifying information is presented in TV ads having identified similar areas of concern through casework.

Early in 2018, BCAP and the ASA agreed that it was time to undertake a wider review of the legibility and comprehensibility of supers in TV ads and to obtain new perspectives on how the TV audience use supers.

The ASA issued a [call for evidence](#) and commissioned [Define Research & Insight](#) to carry out research. Define's final report is published by the ASA alongside BCAP's revised guidance and this regulatory statement. The aims of the research were:

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

2.7. Reviewing and revising BCAP's guidance

The process of reviewing and revising the guidance involved two phases:

- a technical update to better reflect the requirements of the underlying legal framework embodied in the CPRs and to respond to technical developments in the broadcast industry that have rendered parts of the existing guidance outdated (such as changes in international broadcasting standards); and
- an assessment of the findings of the ASA review, including the consumer research, to develop new guidance to ensure that supers are presented in a manner better likely to satisfy the requirements of the BCAP Code on misleading advertising.

During the review, BCAP sought advice from broadcasters, Clearcast, as the clearance body for TV, and creative agencies represented through the Institute of Practitioners in Advertising. BCAP also obtained specialist technical advice from the [Digital Production Partnership](#), a not-for-profit body that represents all major commercial and non-commercial broadcasters and seeks to establish common technical specifications for broadcast content across the broadcast chain, including in advertising.

2.8. ASA review and research outcomes

The ASA has published the outcome of its review alongside the research. The ASA regulatory statement includes a summary of its wider findings. In particular, section 4 of Define's report details the issues identified with legibility and comprehension.

3. Regulatory implications of the ASA review

3.1. Case for regulatory action

Overall, the findings suggest that there are likely to be potential regulatory issues with supers in at least a significant minority of TV ads currently being broadcast. The ads tested by Define were not just those found to have breached the Code by the ASA. They were selected to test a variety of factors likely to impact legibility and understanding; in general, the majority of respondents reported difficulties in reading the supers they were presented with. Some of the problems identified relate to factors not covered adequately, by the existing guidance, and on which the ASA has not ruled.

Text that appears ‘stretched’ or elongated is a good example of a problem area identified. The existing guidance does not specify a minimum character width or maximum number of words per line. Perhaps as a consequence, and to respond to the challenge of media space constrained by time and space, some ads use a compressed typeface to fit more words into each line of supers. This gives the text a ‘stretched’ or elongated appearance as the text must still accord with the minimum recommended line height in the guidance. The result makes the super harder for viewers to read as the normal spacing between letters is lost and the shape of letters and words is distorted. As many legibility problems are caused by combinations of presentational factors, the effect can be compounded.

3.2. Responding proportionately

BCAP considers that a proportionate response is to strengthen guidance provisions in response to insights from the ASA review and Define research. Supers present a complex enforcement challenge. Legibility and comprehension rely on interplay between a variety of technical factors (e.g. background contrast and size of text) and wider principles (keeping supers to a minimum). It is therefore important that the ASA has made a commitment to take a correspondingly stricter enforcement stance to complement the revised guidance and help protect viewers from misleading advertising.

BCAP is also satisfied that the findings of the ASA review do not undermine general policy toward the use of supers, including the basic premises of the guidance. The guidance continues to have a solid foundation, having taken into account important findings from the ITC review that continue to be relevant for TV audiences today; for instance, the guidance covers virtually all the factors identified in the ASA research as affecting the legibility and understanding of supers (e.g. size, contrast, hold and complexity). Although there are a variety of findings in the research that suggest the audience’s engagement with supers is often limited, they do notice supers and they can generally read and understand them when they are presented clearly.

3.3. Setting the bar for protections: the “interested viewer”

One of the central premises of the BCAP guidance on supers is the concept of the “interested viewer, who makes some positive effort, to read all the information contained in the supers” (see guidance section 4.1). Although developed long before the CPRs were introduced (see section 2.4 above), it accords with the average consumer concept that forms an important part of the test of whether an ad is misleading.

The research includes several real-world findings that present challenges to BCAP and the ASA's use of the CPRs' test. The research suggests (see section 3.2) that only a small proportion of respondents spontaneously recalled having seen supers. This and similar findings must be balanced with other findings, however. Viewers tend to watch ads passively only becoming more active when something prompts attention (e.g. an ad for something they are interested in). The research also suggests (section 2.3, in particular) that viewers generally understand what supers are for and that the information contained in them is likely to be important. Moreover, the prompted phases of the research show strongly that viewers can read supers (provided they are legible), if they want to.

BCAP therefore considers that "interested viewer" concept, as well as being in line with the underlying legislative framework, is supported by the evidence of real-world viewer behaviour.

3.4. Audience sub-groups

Another challenge is how the guidance addresses the needs of different audience groups viewing a medium that is viewed by a large number of people.

Define report sections 3.3.1 and 3.4 suggest that some mainly younger viewers do not regard qualifying information for lower-value purchases as important so they do not pay attention to it. The ad is likely to serve as a simple prompt to purchase. This contrasts with older viewers and 'higher-investment' products (e.g. 'big ticket' purchases and financial services) where greater likely interest translates into more attention being paid. To a large extent, this is covered by the aim of making supers reasonably available for the interested viewer to read; the CPRs hold that the average consumer is reasonably observant. There is therefore an onus on viewers to have regard to information presented reasonably in ads. BCAP has nevertheless taken steps in revising the guidance to require more emphasis to be placed on particularly significant qualifying information (see guidance section 4.4).

The Define report found that older viewers and those with poorer eyesight (there was significant overlap between these groups) had more difficulties in reading supers; see report sections 3.3.3 and 3.3.4 respectively. This poses a conceptual challenge over groups with particular vulnerabilities. TV audiences are not sufficiently segmented to make it practical to allow for a developed policy of different approaches in ads for different audience groups. BCAP has therefore had due regard to the likely needs of these groups in setting its overall bar through the "interested viewer" concept including the various changes outlined in section 4 of this document below. Indeed, the findings add to the general case for action and the steps being taken to improve supers will benefit them.

3.5. Support for existing principles

Alongside the findings that support the need for change to improve the presentation of supers, it is important to note the ASA review and research outputs provide considerable support for many existing principles or approaches in the guidance. For example:

- supers should be kept to a minimum as there is only so much information viewers can absorb;
- length and complexity are barriers to legibility and understanding;
- there needs to be basic standards for size and duration of hold of supers; and
- the subject matter is highly complex due to the relationships between different factors for a given ad necessitating significant discretion for the ASA in making decisions (including ruling against ads that are technically compliant).

Such findings provide important support for BCAP's decision to adopt a measured approach revising and strengthening the existing framework and focusing on particular problem areas.

4. Outcome – revisions to BCAP’s guidance

4.1. Revisions to the guidance

The following table summarises significant changes to the guidance and BCAP’s rationale for each significant revision.

The overall structure has been revised quite significantly and several minor amendments made to clarify and improve the wording of many provisions that have been retained. To aid readers’ understanding of the changes, a mapping document is included in Annex B showing the revised guidance alongside the equivalent provisions of the existing guidance.

Guidance Section	Revisions	Rationale for change
Sections 2 & 3	New introductory sections have been added to better explain the scope of the guidance, its place in ASA decision-making and its relationship with the statutory framework set out in the CPRs.	<ul style="list-style-type: none">• Greater clarity has been added on the application of the guidance to different types of service/media platform (see 2.1) and types of text found in advertising (see 2.2). In particular, references to “on-screen text” have been amended to make clear the focus on text added – “superimposed” – onto a creative to provide qualifying information for viewers.• Section 2.4 makes clearer the primary purpose of the guidance – to help advertisers to comply with BCAP’s rules on misleading advertising – and information not covered by the guidance, such as supers added to assert intellectual property rights.• The introductory sections also make clearer the relationship to the underlying legal framework of the CPRs. Importantly, they explain that the guidance represents one way for advertisers to present supers. The CPRs requires case-by-case assessment of ads by the ASA.• Section 3.3 makes another important limitation to the guidance clearer. Owing to the sheer complexity of differing qualification requirements for different ads, it does not address the substance of what supers should or should not contain in different circumstances. The ASA will make the final decision on each ad in its full context.
Section 4.4	An existing provision has been expanded significantly to provide more guidance on the need to afford particularly significant qualifying information greater emphasis.	<ul style="list-style-type: none">• The Define report did not specifically explore the kinds of information that should be included in supers appearing in a given ad. There were several findings of relevance, however. Principally, viewers think that supers are likely to contain important information relevant to the main creative and they do not think such text should be cluttered with superfluous information.• This expanded section provides a framework for practitioners to follow in deciding on the broad types of information to include and the emphasis they should be afforded. For instance, the reference to “terms and conditions” has been added to make clear the distinction between something that qualifies the meaning of a claim and a contractual term that relates to the wider product, service or offering.• Additionally, the existing provision allowing supers only for the purposes of “minor qualifications” has been removed as its inclusion is too much of a constraint for the purposes of CPRs, which require a case-by-case assessment. It is reasonable in some scenarios for supers to include quite significant qualifying information.

		<ul style="list-style-type: none"> • However, BCAP has retained the principle that qualifications that contradict – rather than qualify – a claim made in the ad are unlikely to be acceptable. It will be for the ASA to continue to interpret this in individual ads.
Section 6.2	The provision on typeface has been expanded to explicitly limit the use of 'stretched' or elongated text.	<ul style="list-style-type: none"> • The ITC report warned of the danger of 'bleed' between characters but set this against the need to ensure that words form coherent units to aid swift recognition. The original guidance did not respond with a specific provision. • Section 4.2.9 of the Define report provides strong support for the proposed strengthening of the provision to ensure that typefaces are appropriately proportioned to maximise viewers' opportunity to read them.
Section 6.4	The provision on contrast has been expanded and revised to make clearer the importance of having effective contrast between the supers and background creative.	<ul style="list-style-type: none"> • This is one of the key problems with supers; different factors combine to reduce background contrast and with it, legibility for viewers. • The Define report provides strong support for taking further action (see section 4.2.2, in particular). The report has several useful insights: 'light-on-light' combinations are highly problematic and changing backgrounds or backgrounds with multiple contrasts are likewise problematic. However, section 4.2.4 suggests that moving backgrounds are not inherently problematic, so there is scope to use creative effects short of opaque boxes or letterboxing; remedies for background contrast issues in the present guidance that involve a part of the creative being covered with a single-coloured opaque block on which the supers are placed. • The newly revised provision therefore seeks to provide more of a framework for practitioners to work within. Boxing and letterboxing might be necessary in some scenarios. • Define report section 4.2.9 suggests that there are problems with simply using shadowing and edging effects as remedies to contrast issues. The previous version of the guidance cautioned against this (see also 6.5 below), but the practice has become very common. There is a clear case for allowing techniques short of boxing/letterboxing, but being firmer in cautioning against the use of shadowing/edging. • The research did suggest other remedies; it found that presenting text in bold resulted in improvements to legibility. Amendments here and to guidance section 6.5 (see below) have been made accordingly.
Section 6.5	The provision on use of shadowing and edging effects to improve legibility has been strengthened.	<ul style="list-style-type: none"> • This change supports the revisions included in the new guidance section 6.4 (see above).
Section 6.7	The provision on screen position has been revised to discourage the positioning of supers in parts of the screen other than bottom centre.	<ul style="list-style-type: none"> • The Define report found that unexpected placement of supers – i.e. in positions other than bottom centre of the screen – was a particular problem (see section 4.2.7) for viewers. • In response, BCAP has added cautionary point that supers not bottom-centred should be avoided.

Section 7.5	The provision on length of text has been tightened to encourage use of shorter, centred lines over full line length supers and discourage excessively long supers.	<ul style="list-style-type: none"> • Define report section 4.2.10 found that full line-length supers are more difficult to understand, especially if they contain more than one concept. Breaking a line-length super into two, shorter, centred lines was found to improve legibility. The report also suggests that three or more lines reduces legibility and comprehension. • BCAP therefore considers that there is a case to discourage the use of more than two full lines of supers at any given point in an ad. The requirement for an additional recognition period and larger text height has therefore been amended. It will now be triggered for supers of three or more full line lengths, down from four. • Additionally, a new part of this provision has been added bearing out the research finding that shorter, centred lines are often easier for viewers to read.
Section 7.7	A new provision has been added cautioning against the detrimental impact of supers being in competition with other ad content for viewer attention.	<ul style="list-style-type: none"> • Define report section 4.2.6 discussed the impact on viewers when text in the creative is acting 'in competition' with supers in the ad. It was found to be quite distracting for the viewers. In addition, report section 4.2.5 reveals several insights about other competing content. • The new provision seeks to caution practitioners about this problem and emphasises that having information in the supers appear in context with the claims or images it relates to in the main creative is likely to improve understanding.
Section 7.8	A new provision has been added cautioning against the use of numbers in supers that require viewers to make calculations.	<ul style="list-style-type: none"> • The Define report includes significant findings on the use of numbers and how some approaches frustrate understanding (see Define report section 4.2.3). • BCAP has added a new provision to discourage such approaches unless the claim is likely to be commonly understood (e.g. a stated monthly fee for a 12-month contract).
Section 8.3	The provision on recognition times now includes an additional recognition time period for qualifiers that are particularly significant.	<ul style="list-style-type: none"> • BCAP has decided to retain the overall duration of hold provisions for supers (see below). BCAP nevertheless considers that a response to the findings on duration of hold (see Define report section 4.2.3) is necessary as many respondents questioned whether supers were displayed for a sufficient time. • Alongside the changes to guidance section 4.4 above, an additional recognition period should be used where the information in a super is particularly significant in order to add emphasis and make it more readily available to viewers.
Section 9.1	A new provision has been added cautioning over the impact of supers acting 'in competition' with other ad messages.	<ul style="list-style-type: none"> • The Define report (see 4.1) supports suggests that many negative impacts on legibility and understanding were due to a combination of factors rather than individual ones. • BCAP considers that it could point to the importance of ensuring appropriate contrast between the supers and the background as a means of managing the risk. The new provision makes clear, however, that the ASA is the final arbiter examining ads on a case-by-case basis.

4.2. Technical updates amendments

BCAP has also made several technical amendments to the guidance to reflect changes in broadcast technology and the industry in general. Several instances of legacy terminology have been amended or removed. The following significant changes have been made:

- **Aspect ratios** – Section 5.5 of the revised guidance gives primary prominence to 16:9 aspect ratio reflecting changes in the industry following the digital switch-over. Owing to the possibility that some content may still be broadcast in other aspect ratios, for example 4:3, the guidance continues to reference the 4:3 requirements in a footnote.
- **Screen parameters** – Section 6.8 of the revised guidance includes an updated diagram detailing the caption safe area in which supers must be placed. It is drawn from [European Broadcast Union](#) standards.
- **Split-screen programming** – Section 5.8 has been added to clarify BCAP's position on programming that includes commercial breaks that appear in only part of the original screen area as programming content continues to be shown in the remainder. Clearcast already has a process in place to identify ads that are not suitable for inclusion around such programming owing to potential legibility issues with supers.

Shortened ads – BCAP has included a cautionary point (see revised guidance section 10) to address the practice of advertisers often creating several edits of an ad of varying lengths. Supers in shortened versions of ads will be assessed on their own merits.

4.3. Areas of continuity

There are two important areas where BCAP considers that there is an insufficient basis to make changes to the guidance: line height and duration of hold.

The size of text was an issue for some groups, particularly older viewers and viewers with eyesight impairment (see section 4.2.8). However, it is very difficult to isolate for the effect. The stimuli used in the research often suffered from multiple problems affecting legibility and comprehension. The Define research was broad and exploratory in its approach; it tested real ads in a real-life, in-home setting. This meant participants were able to report on whether they could read the supers and what they believed made legibility easier or more difficult. These insights identified what factors impact on legibility and how these factors relate to each other. As the research noted, however, this approach was not able to make detailed recommendations about text size. Had the Define report identified text size as being an area of high concern, a further, more controlled approach could have been used to investigate in more detail. However, such an approach would have to consider text size in isolation, without the other variables affecting real life ad viewing to consider whether a new minimum size should be recommended.

BCAP is satisfied that the present line heights have a good basis in the evidence. At the same time, viewer experience has undoubtedly been improved with developments in TV technology. The ITC's line height figures were based on average TV sizes as they were at that time: 21" in the early 1990s. Technology has now moved on in terms of both size (most

TVs sold are now 40" or more) and significant improvements in resolution. If anything, this has led to a natural improvement as newer devices have become widespread.

On duration of hold, the five words-per-second standard derives from the average adult reading speed of 300/wpm. The ITC report did not make a recommendation on this, although it did cite research that found 200wpm was the average speed for careful reading. The approach seems reasonable when considered against the fact that the guidance followed the ITC report recommendation for additional recognition times. Moreover, supers are quite short pieces of text. The ITC report noted studies that suggested, for example, that people comprehend 'chunks' of text rather than individual words.

The ASA research adds to that; section 4.2.3 of the report highlighted duration as a significant concern for respondents. However, there are problems in trying to draw conclusions about the effect of the existing duration of hold approach from the report. The influence of different factors affecting legibility was found to be strongly co-dependent. The findings therefore present challenges but are not enough, in BCAP's view, to undermine the guidance on preferred duration of hold in all circumstances. The appropriate balance is to maintain the general five words-per-second requirement, but to enhance the recognition period requirement for supers that contain particularly significant qualifying information (see guidance section 4.4). Moreover, guidance section 7.5 includes a revised provision to require an additional duration of hold for supers comprising three full-length lines of text; previously this was triggered by four lines.

4.4. Next steps

The guidance will come into effect on 1 March 2019. For a period of six months, the ASA will seek to resolve cases informally issuing advice to advertisers on how to improve potentially problematic supers. From 1 September 2019, the guidance will come fully into effect when the ASA will enforce through formal rulings.

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

BCAP also commits to a review of the new regulatory framework for supers after 12 months of full implementation.

Committee of Advertising Practice
Mid City Place, 71 High Holborn
London WC1V 6QT

Telephone: 020 7492 2200
Textphone: 020 7242 8159
Email: enquiries@cap.org.uk

 Follow us: [@CAP_UK](https://twitter.com/CAP_UK)