REFRAMING: ACCESSIBLE ADVERTISING

The start of your journey to delivering personalised accessible experiences

flock. x ISBA





[Image Description: Strips of colourful paint swatches hanging down]

Why Are We Writing This?

Our ambition for the industry is for all advertisers to consider accessibility when briefing to drive towards an Accessible AV advertising ecosystem by June 2024. To support this objective Flock Associates in association with ISBA have produced this guidance to share learnings, ideas and initiatives from other brands that have already started their accessibility journey.

Our previous two guides (Representation of a Nation & Evolution of Representation) have been pivotal in supporting successful Brands to drive the necessary changes to embrace and embed authentic representation across the advertising industry. They both provide practical and actionable guidance on how to start the journey to become more diverse & inclusive in an authentic way (not tick boxing). Whilst there has been a positive focus onto Diversity, Equality & Inclusion over the last few years in media it has not gone far enough. Although many brands now portray more representation in their advertising, to date,

very little has been done to ensure that all adverts are accessible to every audience. It is important for advertisers to have front of mind that it is not possible to be inclusive until **everyone** is included.

What is Accessible Advertising?



[Image Description: Three figures in front of a large projector screen]

Accessible Marketing is the use of inclusive design practices that make it possible for users of all abilities to fully experience the brand, receive and understand communication, and take advantage of opportunities to engage with the brand, services, or products.

Accessibility in Advertising addresses the campaigns' ability to be experienced by those with a form of impairment. This may involve breaking down multiple barriers across sight and sound including – colour, brightness, subtitles, sign language, sound, volume, and language.

What are the types of accessibility impairments people face?



[Image Description: Four Logos representing a type of accessibility – icon 1: an eye with the word 'visual' underneath, icon 2: an ear with the word 'auditory underneath', icon 3: a brain with the word 'cognitive' underneath, icon 4: a pair of hands with the word 'motor' underneath']

- Visual such as sight loss and colour blindness
- Auditory such as deafness of impaired hearing
- Cognitive such as the various forms of cognitive impairments and learning difficulties like ADHD and Dyslexia
- Motor those with motor-skill impairments

In simple terms, this means making content available to as wide a group as possible by integrating their needs and requirements to a campaign.

What are some of the considerations for accessibility?

- Auditory Accessibility, for example:
 - SUBTITLES: Providing subtitles/closed captions, so adverts/content can be understood without relying on the audio
 - o **SIGNING:** Using signing in adverts, ensuring signers are using closed captioning
 - CONTRAST: Ensuring the colours used meet a certain contrast radio, to allow text to be easily read
- Visual Accessibility, for example:
 - o AUDIO DESCRIPTION: Having a descriptive track narration overlaid on an advert
 - DIALOGUE: Using more descriptive dialogue, so content can be followed without the use of visual aid
- Cognitive Accessibility, for example:
 - o **READABILITY:** Having appropriate readability (clarity of language) when text is displayed
 - o **FONTS:** Using dyslexia-friendly fonts
 - o IMAGES: Avoiding flashing and fast-moving images
- Motor Accessibility:
 - o **DESIGN:** Simplifying your design and navigation
 - o INTERACTIVITY: Having interactive elements that are easily clickable/tappable
 - o NAVIGATION: The use of keyboard navigation on websites

What Will We Be Covering?



[Image description: a person holds up a pair of glasses in front of a street that is out of focus]

This guide will focus on the importance of integrating accessibility throughout your campaign development process, and how you can do so starting today using subtitles and audio description. We highlight some key, practical actions you can take to make TVC & Cinema advertising more accessible to people who have a form of hearing or visual impairment using our **ACT** (Accountability, Collaboration & Trading) framework.

Other important topics and audiences to be considered as part of this topic include cognitive and motor accessibility, but we won't be covering this in our guide. Furthermore, this guide does not cover digital accessibility nor cover the end-to-end customer experience. Some great guidance has already been produced in this area. Useful resources can be found at the end of the guide.

We are collaborators (not experts) and have leveraged the opinions, voice, and experiences of others to share learnings, inform, inspire and signpost to helpful resources and tools to start a conversation and action with advertisers and agencies.

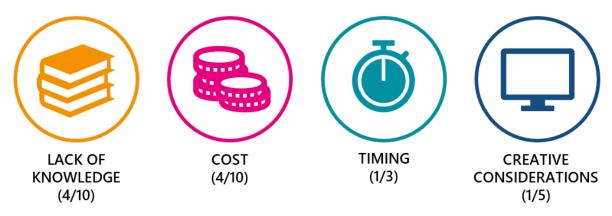
Why Action Now?

There are 12 million people in the UK who are deaf, have hearing loss or tinnitus - That's nearly 18% of the population who are currently not able to easily access or understand adverts. In addition, there are two million people living with sight loss in the UK. Globally these figures get even larger, it is estimated there are 1.3 billion experiencing significant disability, 16% of the world's population (World Health Organisation, Global Report on Health equity for persons with disabilities)

It's not just people who suffer from sight or hearing loss that expect or need media to be accessible. We have an aging population, people with learning difficulties and reportedly four out of five (Stagetext/Sapio Research) 18–25-year-olds choose to use accessible features such as subtitles all or part of the time. Research has also shown that children have better reading skills at an early age if subtitles are switched on at home (https://turnonthesubtitles.org/)

Aside from the fact that it is morally right to ensure all audiences can access media whether that be programmes or advertising, it is critical to a brand's purpose and capital with audiences to build an accessible experience for all their customers.

Brands that leverage accessibility, such as P&G, Unilever, Mastercard and Diageo, have started and progressed their journey in expanding their reach to potential customers, growing their businesses, and having a positive impact on their audience and in their markets. In a recent study conducted by Clearcast (Accessible Ads For All), 98% of respondents said that accessible TV advertising is important. However, many cited the following barriers as impacting their ability to produce accessible adverts:



[Image Description: Four Logos representing the following – icon 1: a pile of books with the words 'Lack of Knowledge (4/10)' underneath, icon 2: a pile of coins with the words 'cost (4/10) underneath, icon 3: a pocket watch with the words 'timing (1/3)' underneath, icon 4: a TV screen with the words 'creative considerations (1/5)' underneath']

Even with the huge strides that have been made with technology over recent years, advertising still often misses the mark for accessibility and inclusivity. Certain demographics are often misrepresented (or not

represented at all), and some ads can't be enjoyed or understood by the audiences that were intended to see them.

Organisations such as the RNID & RNIB who champion deaf and blind audiences have been campaigning for years on this topic and legislation is soon to be in place that will help to drive better accessibility:

- <u>UK Media Bill (2023)</u> audiences will be able to access and enjoy high quality, British originated content more easily.
- <u>European Accessibility act</u> (2025) will be rolled out across all EU countries to make products and services more accessible. Whilst we are no longer in the EU, it is expected that the UK Government will follow suit.

Making advertising accessible to everyone benefits us all. Accessibility is large spectrum and includes a variety of individuals from someone being born with a visual or hearing impairment to someone who later in life may experience sight or hearing loss due to an accident, illness or aging. At some point, it is highly likely that we (or know someone close) will have the need for accessible products and services or have the need for accessibility throughout our day to day lives.

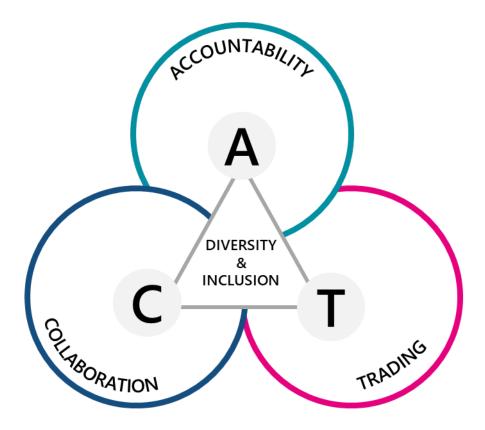
Example one: Example two: Example three: Joe has grown up with tinnitus, After a sight loss diagnosis in her May has just turned 65 and has which is a persistent ringing or 20s, Isla is now adjusting to life always been an avid TV watcher. buzzing in the ears. The sound with a visual impairment. She recently developed cataracts which have affected her vision varies in severity, but at times, and ability to watch TV. when the ringing sound Isla was a big fan of cinema and becomes too intense, Joe has now relies on screenings that are trouble concentrating She now uses Audio Description and to provide audio listening to sounds. In these description so she can continue to watch TV but has noticed not instances, he prefers to visually to experience her favourite films. all adverts have this option. consume content, and will watch TV with subtitles on.

- ITV https://youtu.be/66aRAK3KXmg
- RNIB 1 https://youtu.be/vR8kj5qS15Q
- RNIB 2 https://youtu.be/_gVJJkjsJxY
- RNIB 3 https://youtu.be/l14Dk1j5agg

Time to ACT

To recap on the principles, we believe that Marketing is simply one individual communicating to another and so to be as authentic and inclusive as possible, advertisers and agencies need to ACT:

- Be Accountable by increasing your circle of diversity
- Be Collaborative by surrounding yourself with companies and people that promote diverse values
- Trade with diverse organisations and media channels



Ultimately, organisations need to be open to growing, learning, and evolving their processes and teams to address the needs of a wide and diverse audience whether that be sexuality, race, gender, or accessibility.

Addressing accessibility is not necessarily about getting it right first time. Even the smallest steps can make a big difference in speaking to and including as wide an audience as possible. However, we appreciate that change is hard, that it takes time, budget, and a companywide shift in behaviours. Many of the individuals we have spoken to have said that initially accessibility in advertising felt like an overwhelming topic, that they didn't know what to do or say. We've taken their learnings, advice and recommendations and consolidated them into immediate and long-term actions to help guide your accessibility strategy. Of course, this is not an exhaustive list, more of a helpful starter for ten. There will be many more steps that you can take along your journey to becoming more accessible.

Ultimately, all brands and agencies need to be thinking about accessibility from the start. REFRAMING it not as a problem that might impact creativity but as an opportunity to build a strong brand and grow your audience

Our Reframe Toolkit

Immediate Actions

Accountability:

Increase your awareness of Accessibility in Marketing & Advertising

Find out first-hand what it means to have a hearing or sight impairment and what a lack of accessibility means, how it can impact your team members, friends & family, and customers. Becoming and remaining inclusive is a continuous process, not a one-time event (see useful resources for additional guidance and sources of information).

All brands and agencies to 'Opt-in' on Subtitles

We propose that the industry works towards instructing their delivery partner to always 'Opt-in' rather to 'Opt-out' for subtitling. Initially as instructed by agency and/or brand but driving towards a wholesale change. This means that advertisers will have to choose to remove this functionality from their adverts. We hope that this will help to start a positive movement but also an important change in mindset. This is a simple, quick fix and takes only a couple of hours to implement. Rates vary by volume and advertiser but are generally a few hundred pounds per advert.

For Cinema, subtitles can also be simple to implement. The key is to inform your agency early enough so that files are supplied with caption copy and so that the CAA (Cinema Advertising Association) have enough time to approve captions (this takes approximately 24 hours). Contact the DCM (see useful resources) for further information on their process.

Review your 2024 strategy & plan for the next 2 years

Take the time to review your strategy with your partners against the guidance available and consider how you might need to adjust:

- Budget to include sufficient allocation for subtitles, audio description and where possible signing.
- o Timings ensure campaign phasing allocates enough time for the integration of accessible advertising elements e.g., audio description
- Media targeting reviewing budget implications
- Measurement & KPIs to include accessibility metrics

Collaboration:

Engage with specialists to review your work

To truly be accountable, organisations will need to collaborate with specialists or end users. The RNIB and RNID provide fantastic support (see useful resources) and guidance around the topic of accessibility. They currently work with major brands such as P&G and Unilever providing consultancy on accessibility workstreams and are happy to engage with brands to review your current work and provide feedback to inform any future plans or campaigns that you might have planned.

Campaign planning and execution process

Look to integrate some of the following elements in upcoming campaigns:

- Add in check points to your process. Encourage your team to question the work at each stage to determine if the brand and message can be understood by as many audience members as possible through:
 - Conveying the message through subtitles and / or signing
 - Audio description ensuring there are enough audio cues and space for the brand to be identifiable and the key messages understood
- o Include accessibility as part of your creative briefing. Engage your creative agency as early as possible in the campaign process, ensuring that accessibility is an integral part of creative development and ideation.
- Allow enough time to collaborate with industry experts (industry bodies, ISBA, focus groups
 etc.). Ask for their advice at brief stage, when developing scripts, concept creation, ideation
 or conducting research. It will help to gain a fresh perspective and avoid costly and timely
 rework later down the line.
- Allocate time and budget allocate a percentage of your budget for accessibility and ensure that this cannot be cut at any point in the process. As mentioned previously, subtitle rates vary by volume and advertiser but are generally a few hundred pounds per advert. However, signing and audio description costs can vary. Also look to incorporate enough time to implement accessibility features:
 - Subtitles allow 2+ hours
 - Signing allow 1 week, please note that signing specialists are in short supply so this will need to be booked in advance
 - Audio description ideally this should be incorporated into any script or planning from the beginning, however if applied in post-production, allow 3-4 days for any changes and approval process

Trading:

Look to work with audio description partners for your next advert

Whilst opting-in for audio description is a positive step, often audio requires a more considered approach and planning. It's important to give those using audio description the space and cues needed to fully understand and experience the brand. This should be considered at script stage but advertisers could also benefit from engaging with audio specialists to ensure that the end to end experience for a visually impaired audience member is a comprehensive one.

Long term

Accountability:

Invest in people, training and skills

Beyond conducting your own research and reaching out to industry experts, it's important to prioritise next level training for your team. This can include anything from the basics such as terminology to how to integrate, manage and cater for varying needs e.g., designing with contrasting colours, copywriting for visually impaired audiences to understanding changing trends and legal requirements in the industry. The industry is changing at such a speed that skills and capabilities in this area will need to be regularly assessed to address any gaps in your team.

Build your own accessibility immersion center

Whilst engaging with end users and specialists is a critical first step towards integrating accessibility into your campaigns, creating your own immersion center can be a useful tool to experience your adverts from a different viewpoint (see useful resources, Google Accessibility Center).

Leverage the use of Technology

Familiarise yourself with the range of accessible technologies out there and find ways to integrate these into your processes. For example, using Auto Image Captioning tools to generate image descriptions, or contrast colour checking tools to see how accessible designs are.

Hold both brand and agency teams accountable

Make sure both your team and the agencies you are working with are held accountable for delivering on your agreed accessibility strategy. Internally this could be through including accessibility-based objectives within personal development plans or this could be through including accessibility focused questions through annual 360 appraisals.

Collaboration:

Review and update end to end process & ways of working

Another way to embed sustainable change is through evolving your process and ways of working. We believe any efforts to be more inclusive drive creativity, innovation and ultimately result in better work. Some points to be reviewed / considered include:

Creative briefing process

Adjusting templates to involve accessibility from the start. Ideally, this should also include an option for opting out for subtitles and audio description to support these elements being integrated for every campaign. Where possible, conduct briefing sessions with an immersion element to encourage a different perspective / viewpoint.

Reviews and feedback

Adjusting templates to include accessibility, reviewing creative from an accessibility standpoint i.e., with no sound, audio only etc. testing ads with diverse audiences

Production

Adding in suitable timings for richer descriptive audio, subtitles and sign language as standard.

Start to ensure that two track audio is included as part of any campaign development. What do we mean by two-track audio? This is the process of creating an accessible version of an audio track at the same time as the 'default' track is produced. The secondary, accessible track features a far richer descriptive audio that can be listened to without much use of visual aid (think of a radio advert), allowing audiences with visual impairments to select the appropriate track and giving them the means to access and understand the advert.

Measurement & KPIs

Adjust short and long-term metrics to focus on Return on Inclusion and ensuring that all content is 100% accessible to all audiences.

End of project wash ups

Reviewing and applying learnings around accessibility for future work

o Partnership manifesto

Create (or adjust if already exists) clear principles and guidance of how to integrate accessibility with your agency partners.

Quarterly innovation sessions

Bringing together agency partners from across your ecosystem and invite accessible audiences / experts to think develop accessible ideas and initiatives.

Specialists

Identify and integrate the use of accessibility advisors throughout your campaign development process.

Trading:

Review and update your supplier contracts

Work with your procurement team to understand when your contracts are up for renewal, this is a great opportunity to reset expectations and pave a new path for how you work together around the topic of diversity and inclusion.

If you decide to go to pitch, set clear expectations around how you expect the team to operate, the level of their skills and understanding around the topic of accessibility and your objectives for producing accessible work. This can be laid out as early as RFI stage so that you can properly interrogate their DEI policy, but also be included at RFP / brief stage to ensure that this is woven into their offering.

Incorporate accessible trading into your media planning and buying

Major broadcasters such as ITV and Channel 4 provide accessible services for their audiences, although this is not consistent across all broadcasters. We know it's a journey and requires tech development but with advertiser and consumer demand we endeavour to see this number grow.

Case Studies

The needs and requirements of every facet of society vary and can be complex, however we believe that by following the principles of ACT, testing, and learning from initiatives and sharing these experiences with others, in the future, all brands should be able to consistently offer personalised, accessible experiences across all advertising, platforms and at every stage of the customer journey.

- P&G https://youtu.be/IAE8tnRKXVE
- T&P https://youtu.be/LLNkOEbBgCw , https://youtu.be/dlDMoO6WhAQ
- Unilever https://youtu.be/bC8TME1GLHM

Useful Resources

Now that you have a framework in place to guide you on your journey to delivering accessible advertising, we have pulled together several sources and specialist companies who may be available to help you on your accessibility journey (including those referenced throughout this guide).

1. RNIB – www.rnib.org.uk

The Royal National Institute of Blind People (RNIB) is a UK charity offering information, support and advice to almost two million people in the UK with sight loss. They are experts in consulting on how to make advertising accessible for those with sight loss.

o Contact them here for their guidance on short form content

2. RNID - www.rnid.org.uk

The Royal National Institute for Deaf People (RNID) is a charitable organization working on behalf of the UK's 9 million people who are deaf or have hearing loss. They are experts in consulting on how to make advertising accessible for those with hearing loss.

3. Flock – www.flock-associates.com

Flock are marketing transformation consultants that work with advertisers to optimise processes, people, procurement, and partner relationships. Flock is a team of independent experts who have worked both client and agency side so we know the critical elements that drive successful change and ways of working. Whether you are looking to completely revise your process, adjust your contracts or revamp your templates, Flock will provide future-facing, unbiased consultancy that will deliver better outputs by putting authentic representation at the forefront of your strategy and campaign planning.

4. ISBA – www.isba.org.uk

The Incorporated Society of British Advertisers (ISBA) brings together a powerful network of marketers with common interests and gives a single voice to advocacy for the improvement of the industry. ISBA are continuously making huge strides to provide an inclusive and sustainable advertising environment for marketers.

5. AdText - https://www.adtext.tv/

Adtext has been supplying subtitles to the advertising industry for over 15 years. Adtext offers a dedicated service and subtitles around 95% of commercials. Adtext offers training or information free of charge to any advertiser or agency if requested.

6. Clearcast – www.clearcast.co.uk

Clearcast provides subtitling as a part of their ad delivery services. You can order subtitles before your advert has been cleared for broadcast, making the process quicker. They also support accessibility by providing an RNIB & RNID-approved ad accessibility training course. Please follow this link for more details https://clearcast.co.uk/book-training-courses/ad-accessibility-training/

7. WCAG - www.w3.org/TR/WCAG21/

The Web Content Accessibility Guidelines are part of a series of web accessibility guidelines published by the Web Accessibility Initiative of the World Wide Web Consortium, the main international standards organization for the Internet.

8. Google Accessibility Center - https://blog.google/around-the-globe/google-europe/united-kingdom/the-accessibility-discovery-centre-is-open-for-collaboration/

The Google Accessibility Center is a dedicated R&D hub focused on showcasing innovative accessibility in technologies.

9. EGTA Knowledge Hub - https://www.egtaknowledgehub.com/ad-accessibility/

EGTA's (European Group of Television Advertising) Knowledge Hub has curated resources and business insights tailored to empower media and advertising professionals. Including a large library of content focused on accessibility.

10. DCM Digital Cinema Media - https://www.dcm.co.uk/

DCM are the leaders in cinema advertising in the UK. They are strong advocates of accessible cinema advertising, and can work with you to ensure cinema adverts are accessed by all movie-going audiences.

11. Ad accessibility alliance network

A collective advocating for Accessible Advertising globally, contact ISBA for more information.

12. Meta

Meta's vision is to make ads accessible to everyone. To achieve this, their teams have been hard at work developing ads accessibility tools for people with hearing and visual impairments, including Video Captions, Alt Text, and Audio Descriptions.

13. IPA - www.ipa.co.uk

The Institute of Practitioners in Advertising are an organisation that brings together a network of agency practitioners, providing valuable support, empowerment and resources.

- 14. Links to referenced legislation
- UK Media Bill (2023)
- European Accessibility Act 2025
 - 15. Great work referenced by interviewees –
- P&G / L'oreal: Pantene Pro-V with Lucy Edwards
- RNIB X The & Partnership: #SeeThePerson
- RNIB X The & Partnership: Design For Everyone
- MasterCard: Spotlight
- ITV Silent Ad Break
- Cadbury Dairy Milk Fingers: Sign with Fingers Big & Small
- Unexpected Guest (Audio Described): John Lewis & Partners | Christmas Ad 2021
- Aldi: Christmas launch advert audio described edition
- Channel 4 Launches Audio Described Ad-Break Takeover

Useful links

- Using the correct language: https://www.gov.uk/government/publications/inclusive-communication/inclusive-language-words-to-use-and-avoid-when-writing-about-disability
- Understanding Integrated Described Video: https://www.ami.ca/idv

Summary – Key Takeaways

Addressing accessibility in advertising is long overdue. By producing advertising that is inaccessible to sections of society, advertisers are not only missing opportunities to engage with a wider audience, but they are also not being an inclusive brand. Brands cannot authentically portray themselves as diverse and inclusive until everyone is included.

Legislation is changing and many brands such as Diageo, P&G, Mastercard and Unilever are already starting to lead the way in accessibility. However, becoming a truly inclusive brand does not happen overnight. There are actions that can be taken immediately and longer-term goals that can be worked towards. You might not get everything right the first time but if as an industry we work together, sharing our learnings and experiences we can build experiences that are accessible to everyone.

The change we are encouraging everyone to take immediately is to Opt-in for subtitles. This simple step is quick and simple to implement during either post-production, ad delivery or clearance. This immediately includes a larger proportion of the deaf or hard of hearing community in addition to Gen Z and beyond.

Additional and longer-term areas for advertisers consider addressing include:

PEOPLE

Teams are properly trained and understand how to engage with communities who have special needs.

Include specialists in your campaign processes!

PARTNERS

Process and ways of working are reviewed and updated to include accessibility from the beginning with new templates, checkpoints and ways of immersing teams in accessibility requirements e.g. brand immersion centres, innovation days etc.

PROCESS

Talk to your agency partners to review your future strategy and plans to ensure there is ample budget and time so that accessibility is part of the creative development process!

PROCUREMENT

Seek to work with media owners who provide accessible adverts and programmes

If you are conducting a pitch, include accessibility in your RFI & RFP process, make it clear from the beginning that accessibility needs to be integrated into everything you do

Review contracts and update to reflect DEI principles that encompass accessibility.

As mentioned in the beginning of this guide, there are many facets to accessibility. Many different needs and requirements across multiple channels that we have not been able to cover. However, we hope that the information shared around accessibility in advertising for the visually impaired and hard of hearing communities will help start to prompt conversation, spark ideas and drive action towards creating accessible, personalised brand experiences for all.

About Us & Acknowledgements

A message from the authors:

Driving authentic representation is a journey for all advertisers and agencies. Whilst we have seen some

positive progression regarding DEI topics following the launch of our previous guidance (Representation

of a Nation & Evolution of Representation), significant gaps remain for the important area of accessibility.

When speaking with industry stakeholders who do not yet include accessibility as part of their advertising,

we received the same feedback - that they weren't sure where to start as there has been limited, joined-

up guidance that provides clear signposting on the resources available and the steps they need to take.

Hence the need to create our third DEI led guide, to support advertisers who are beginning to embark on

the next phase of their DEI strategy, accessibility.

As individuals do not have accessible needs and are not experts in this area, we're really thankful for the

enthusiasm and time that all of our contributors gave us. They provided access to resources and

introductions to subject matter experts that made the creation of this guide possible. This includes: RNIB,

RNID, Channel 4, Digital Cinema Media, Meta, Clearcast, Adtext, ITV, IPA, Google, The & Partnership,

Diageo, P&G and Unilever. Their views, opinions and recommendations have been invaluable for creating

this guide.

We hope you find value in the information we have shared and look forward to seeing more accessibility

in advertising.

Flock Employees: Aysha Haynes, Halima Kalim, Katie Elsey

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Flock is The Marketing Transformation Company. Marketing transformation is the process of reinventing an organisational marketing ecosystem, making it fit for the future. We focus on the operational aspects of marketing, improving marketing effectiveness & efficiency. We are "compulsive fixers"; fixing marketing strategies, skills & structures, marketing processes, marketing technology resources and agency rosters and supporting clients in developing sustainable business strategies to include diversity and inclusion practices.



ISBA is the only body that represents **brand owners advertising** in the UK. We empower them to **understand the industry and shape its future** because we bring together a powerful community of marketers with common interests; **lead decision-making** with knowledge and insight; and give a **single voice to advocacy** for the improvement of the industry.

References:

- World Health Organisation, Global Report on Health equity for persons with disabilities)
 https://www.who.int/teams/noncommunicable-diseases/sensory-functions-disability-and-rehabilitation/global-report-on-health-equity-for-persons-with-disabilities#:~:text=An%20estimated%201.3%20billion%20people,health%20as%20those%20with out%20disabilities.
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- Clearcast Accessible Ads for All https://clearcast.co.uk/news-and-blog/accessible-ads-for-all-survey/