



Managing access services in Nordic public service broadcasting companies

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<p>Abstract:</p> <p>Many of us take for granted the ability to easily consume news, movies, children's programmes and content on the Internet. But for persons with disabilities, such as a hearing or visual impairment, it is not as self-evident. How do you watch the news, if you cannot hear what the news anchor is saying? How can a blind child consume children's programmes on TV or on different streaming services? Media in a global environment plays such a huge role in everyone's lives today, that having access to it ought to be possible for all citizens, disabled or not. A human right, in other words.</p> <p>Making the content accessible for everyone is arguably in the core of public service media. The aim of my thesis is to analyze how the Nordic public service broadcasting companies access services are organized and managed. More specifically, whether a more centralized or decentralized management model seems to work better.</p> <p>I hope that my research will give valuable insight for the Nordic public service broadcasters to use in their development efforts. My broader goal however is, in the end, to help make Yle's content more accessible for all Finns.</p>	
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1 INTRODUCTION

This thesis is a research in how access services are organized and managed in the Nordic public service broadcasting companies. My main goal is to locate differences between the companies' access services management, and to evaluate the strengths and weaknesses of the different models, specifically in regard to how centralized or decentralized the management and decision-making processes are. The companies included in my research are SVT (Sweden), NRK (Norway), DR (Denmark) and my own employer, the Finnish Broadcasting Company, Yle.

Although I, of course, also recognize the Icelandic public service company RUV as one of the Nordic public service media companies (hereafter PSM's), I have chosen to exclude RUV from my research because of their significant difference in size compared to the other Nordic PSM's.

1.1 Scope

Access services generally refer to a variety of aids provided for users with disabilities. My research will focus on the access services provided by the previously mentioned PSM's, with an underlying objective of finding out what the best possible model could be for Yle.

The disabilities referred to in my thesis are mainly visual or hearing impairments, although also senior citizens, persons with cognitive difficulties as well as foreign language speakers among others, tend to benefit from access services. Access services currently provided by Yle are limited to subtitles, spoken subtitles, audio descriptions and programmes in (or interpreted into) sign language. The general accessibility of web services is also discussed, although web and app accessibility per se does not play a significant role in my thesis.

1.2 Research questions

As mentioned, the main goal of my thesis is to find answers to what might be the best way to manage access services in Nordic PSM:s, and more specifically what might be the best model for my employer, Yle. I want to know what factors affect the decision-making process, where within the organization decisions should be made; if it is better to have a centralized management, i.e. concentrating all accessibility responsibilities to one instance within the company, or if a decentralized model where responsibility and power is scattered throughout the company is to prefer. Based on these goals, I have stated the following research questions:

RQ1: Are there clear patterns to be seen in what leads to successful access services management in Nordic PSM's?

RQ2: What are the advantages and disadvantages of centralized vs. decentralized access service management in PSM's?

RQ3: Is there an optimal way to organize access services in Nordic PSM's?

1.3 Background

During the past few centuries, human rights have been one of the most influential concepts and are an essential part of most modern states and societies (Greco, 2016). Some scholars have however begun to argue that media accessibility has been neglected among the human rights activists and experts (Greco, 2016). Greco (2016) argues that human rights experts tend to limit the connection of media accessibility, such as subtitles and audio description to users with disabilities, instead of thinking of media accessibility as a human right. Greco (2016) calls this the 'Accessibility as a Human Right Divide' Problem (AHRD Problem). The AHRD Problem highlights the divide between accessibility as a human right per se versus accessibility as an instrument for the fulfilment of human rights (Greco 2016).

Media accessibility and access services are becoming increasingly important for many companies and public broadcasters in particular. This change derives from a higher level of awareness and hence also increasing demands from the end users. The increase in awareness and demand is inevitably also leading to more legal demands, with the EU Accessibility Act, which became effective by the end of June 2019 as a recent example. At the time of writing my thesis, the Finnish Government was working on new legislation that would have a direct impact on Yle (Valtioneuvosto 2020).

Rapid change and an almost exponential increase in demand for service puts high demands on management, co-operation over organizational silos as well as strategic planning. Therefore, I believe my research will be of value to my employer Yle, as well as the other Nordic PSM's.

Media accessibility is an important topic for me personally, having worked as the Head of Yle's translation and accessibility services for nearly ten years, after more recently moving on to other responsibilities within Yle. During my time as Head of Yle's translation and accessibility services, I worked in close co-operation with the interest groups i.e. (among others) the Finnish hearing and visually impaired association, the other Nordic PSM access services experts, the Finnish legislators and international networks such as the European Broadcasting Union EBU's Access Services Experts group. Through my work I have also identified some of the challenges that Yle faces in regards to managing and developing their access services. Perhaps the most important challenge being the lack of basic accessibility awareness among a large majority of the employees. Media accessibility has not yet been woven into the company's organizational culture in the way I believe it should be, at least in the best of worlds. Yle employs more than 3000 people, and it is therefore understandable that not everyone has a deep understanding of accessibility issues. Nevertheless, for reasons I will clarify later in my thesis, a good general awareness amongst the employees is vital for a positive development and overall outcome.

There are an estimated 800.000 hearing impaired and 55.000 visually impaired citizens in Finland (Kuuloliitto 2022 & Näkövammaisten liitto 2022). When you add to this people with other types of impairments, one can conclude that nearly a fifth of the Finnish population profits from different types of access services. Nevertheless, as Greco (2016)

points out, media accessibility shouldn't be seen as benefiting only people with impairments. Good accessibility should be viewed as a basic human right and something that benefits the public as a whole (Greco 2016). However, good accessibility is of course vital for the aforementioned groups as well as for persons with cognitive challenges, senior citizens and foreign language speakers to mention the most obvious groups.

My personal perception is that despite Yle's top executives' positive attitude towards minority needs and the actions needed to develop the company's overall accessibility, Yle still falls behind in comparison to other Nordic PSM:s when it comes to understanding the importance of great accessibility to the company's content. Ahead of conducting my research, I had the presumption that one reason for this might be that the other Nordic countries have a longer tradition of producing access services than we do in Finland. Sweden's SVT, Norway's NRK and Denmark's DR all produce larger volumes and a greater overall variety of access services than Yle (Cimino F., Rossignol-Farjon A. 2019). However, in many other ways both the companies as well as their respective customers have many similarities. That is why I find it fascinating to compare the management of access services in the aforementioned PSM's, in order to find out what role the different models of management and organizational structures might play.

Yle's current range of access services consist of television subtitles, spoken subtitles, content in (or interpreted into) sign language, as well as audio description. Increasing emphasis is also placed on making the web and mobile content accessible for the visually impaired.

The demands from the users as well as steadily increasing legal demands for access services also make my research an interesting subject at this point of time. Adding to the equation several more or less disruptive technological innovations such as machine translations, automatic speech recognition and the power of artificial intelligence makes this a highly interesting environment to study.

My research is based on a theoretical framework and interviews with key persons who work with accessibility services in the aforementioned companies as well as key persons from the Finnish hearing and visually impaired association. The theoretic framework is built on management theories and on previous studies in the field of accessibility.

1.4 Definitions

Some of the definitions used in my thesis might not be very common to the reader. In this chapter I will try to clarify especially ones that are used mostly by people working in the field of media accessibility.

1.4.1 Accessibility

Accessibility generally refers to making content, services, products, devices and other environments usable for people with disabilities. Web accessibility means coding web pages in such a manner that people with visual impairments are able to use the pages by using aides such as automatic screen readers.

In this thesis accessibility, or more precisely media accessibility, refers to making video, audio and textual content as well as digital applications more usable for people with disabilities.

1.4.2 Access services

The term Access Services is generally used by the European Broadcasting Union to explain “responsibilities covering subtitling, signed programmes, audio description and audio subtitling which enable sensory challenged people but also persons with intellectual disabilities, dyslexia or language difficulties to access public broadcasters all over Europe.” (EBU 2020). I will be using this term frequently in my thesis, as I have found it to be a good way to differentiate the services in question from general accessibility.

According to Vorozheykina (2019), people with different types of disabilities i.e., people who benefit from access services make up to 20% of the world population.

1.4.3 Public Service Media

Public Service Media (PSM) is broadcasting, and other forms of media made, financed and controlled by the public, for the public. It is non-commercial, free from political interference and pressure from commercial forces (Yle 2020).

2 METHOD

My research is a qualitative study of the aforementioned Nordic PSM's access services management and organization. The focus is on how the four companies manage their access services and what challenges they have faced and see themselves facing in the future. My emphasis is on how and where within the organizations decisions and strategies are made, and from where access services are managed.

2.1 Theoretical framework

The theoretical framework for my thesis is based on theories involving organizational behaviour and the idea of centralization / decentralization, business management and company hierarchies. There is a vast body of literature exploring these subjects, such as Nahavandi et. al., 2015, Downes J. 2019 and Mullins, Laurie J. 2013 to name just a few. I find these theories relevant for my research, because I believe organizational structures play a significant role in the successful implementation of effective access services models in a PSM's company structure.

But before diving into organizational structures, I will open up some of the major changes that the media business and specifically public service media has gone through during the past few decades.

2.2 Interviews

To gather sufficient insight into the companies current access services management, I have interviewed key persons in charge of access services (or parts thereof) in the respective companies. I chose to interview these people, because I believe they have the best knowledge of how the access services are operated and the challenges related to day-to-day management and planning. They were also able to give me the best insight into things such as e.g., their expectations towards their executives.

Since having known most of my interviewees for several years, I had no issues getting them to participate in the interviews. At the same time, I realize that interviewing people whom I have known and worked with before, might imply objectivity issues. I found this to be important to take into account especially in one case where the interviewee was my former subordinate. I put special emphasis on keeping the interviews as neutral

and objective as possible and to also be as objective as possible myself, i.e. not to make leading questions.

The interviews for this thesis were performed in a semi-structured fashion in order to give me the benefit of a structured interview while still leaving room for spontaneous discussion as well. In some cases, I also ended up asking unplanned questions, in order to dig deeper into subjects I found interesting. I wanted to leave room for discussion, as I suspected the discussions would flow freely with the persons I know well.

In addition to the Nordic PSM access services managers, I also interviewed specialists from the Fin-nish Fe-de-ra-tion of the Vi-sual-ly Im-pai-red (NKL) and the Finnish National Hearing society (Kuuloliitto). I wanted to interview these people because both organizations are in regular contact with Yle, as well as with many visually and hearing-impaired citizens who consume Yle's content. My presumption was that they would likely have their own, valuable perspective on Yle's access services and how the services are managed. I was interested specifically in their opinions on Yle's current, decentralized type of management of the services.

Lastly, I considered interviewing someone at the Finnish Ministry of Transport and Communications. However, in the end I decided not to, as that would have been beyond the scope of my research.

2.3 Interview questions

As said, my interviews were semi-structured and varied to some extent from person to person, as I wanted to leave room for open discussion. The set of questions functioned as a base, but I did not follow them precisely.

I divided my interviewees into two groups:

1. key persons working with access services in a Nordic PSM
2. Yle's access services stakeholders (or rather representatives thereof)

Questions for group 1.:

1. What is your role at xx (person's employer) and what are your responsibilities?
2. How many subordinates (if any) do you have?
3. Describe what your department / team etc. does?

4. Where would you place yourself in your company's official hierarchy (middle management etc.)?
5. Describe your relationship to the directors of your company?
 - a. How would you describe your company's directors' understanding and involvement in access services?
 - b. How about the rest of your personnel?
6. How would you describe your relationship to the rest of the company and which departments do you work with the most?
7. Does your company have a specific strategy for access services and if so, can you explain it to me?
 - a. Who is responsible for making your access services strategy?
 - b. How do you go about implementing the access services strategy?
8. How would you describe the decision-making process in regards to access services in your company?
 - a. What factors affect the decisions that are made (legislations, company values etc.)?
9. Would you say that you have a centralized or decentralized access services management?
 - a. I.e., is the management of your access services spread over different departments or focused to one department?
 - b. Is one person responsible for all accessibility, or is the responsibility spread between several persons?
 - c. If decentralized, how well would you say the communication between different instances works?
10. What would you say are the greatest current challenges in regards to managing access services at your company?
11. Are there any significant structural changes you would like to make?
12. Is there something you would like to point out that works exceptionally well?
13. What do you think are the major challenges your company might face in the future (in regard to access services or accessibility in general)?

Questions for group 2.:

1. Describe your role in regards to Yle's access services

2. Who are you usually in contact with, when dealing with Yle's access services responsibilities?
 - a. Do you usually find it easy to locate the correct contact within Yle?
 - b. Are the persons you contact usually able to give you the information you need directly?
3. Do you know how Yle's access service responsibilities are organized within the company?
4. From your personal point of view, is it better to organize a PSM's access services in a centralized or decentralized manner?
5. If you could change one thing in regard to how Yle's access services are organized, what would it be?

I conducted the interviews in Finnish, Swedish and English, as this gave my interviewees the option of speaking their mother tongues or a second-best option. The interviews with my Danish and Norwegian subjects were conducted in English for the sake of clarity.

I started by interviewing my closest colleague, Minna Pöntys, who had worked as an accessibility expert at Yle since September 2019. She was also my substitute during my study-leave and an important inspiration for my thesis. Before deciding on the subject and scope of my thesis, I had several discussions with Pöntys. She had gathered a comprehensive insight into what parts of the current access services management at Yle functioned well and where there was room for improvement.

After having interviewed all the Nordic accessibility experts, I proceeded to interview Yle's most significant access services stakeholders. I was careful to underline my role as foremost a researcher and not an employee at Yle. I believe both Sami Virtanen from the Finnish National Hearing Society (Kuuloliitto) and Markku Möttönen from the Finnish Federation of the Visually Impaired (Näkövammaisten liitto) were as objective and truthful as possible in the way they answered my questions.

2.4 Limitations

When I started working on my research, there were strict travel restrictions in all Nordic countries, due to the ongoing Covid 19 pandemic. Therefore, traveling to the respective Nordic countries to do the interviews in person was out of the question. The next best

option was to conduct the interviews via video conference calls. This actually ended up working very well for me. I also believe my interviewees were happy with the virtual interviews, and everyone seemed to have gotten used to the technicalities during the so-called Corona Spring of 2020, when practically everyone worked remotely.

I realize having worked with access services at Yle might lead to confirmation bias on my own part. As the reader might have already gathered, I not only have expertise in the field, but also opinions and presumptions. While I will try to be honest and open about what I have learned while working with accessibility issues, I will do my best to clarify when something is indeed only my subjective opinion and when I can back something up with research findings. I will also do my best to keep my opinions and presumptions aside from the objective conclusions that can be made through my research.

Before receiving the position as Yle's access services expert, Minna Pöntys worked for several years as the team leader for Yle's subtitling team. I had been working closely with her during those years as her superior. Having worked as Minna's superior, I realized the possibility of bias while interviewing her. We had an open and honest discussion about this before the interview, and in hindsight I do not think our professional relationship affected her answers in any significant matter.

3 LITERATURE REVIEW

As mentioned before, the theoretical framework for my thesis is based on theories involving organizational behaviour and the idea of centralization / decentralization, business management and company hierarchies. But I will start by setting the scene for the current state of public service media.

3.1 Public service media in change

Since they were founded in the early 20th century, public service broadcasting, especially in Europe, had been provided by legacy public service organizations that usually had what many would have called a monopoly status (Lowe et.al., 2017). This status was stable for many decades. But by the mid-1990s, things began to change, as digitalization started to drive strong global conglomerates and audiences started to become more fragmented (Lowe et.al., 2017). This led to the evolution of public service broadcasting (PSB) towards public service media (PSM), as public service companies started taking on more

and more online services (Lowe et.al., 2017). Gone were the days when public service broadcasting was seen as a strictly one-way service; from one to many.

The Nordic countries have a history of strong public service media (Carlsson, 2013). The region also has a tradition of co-producing content and collaborating between the PSM:s (Carlsson, 2013). There is a strong belief that knowledge and access to free speech and unbiased media is truly essential when it comes to maintaining a strong democracy (Carlsson, 2013). Thus, also sharing knowledge in the area of access services comes naturally.

After losing monopoly status, Nordic PSM:s have also lost market shares and their market dominance (Carlsson, 2013). The introduction of other types of media broadcasters led to PSM:s shifting their programme policies towards new genres in order to be able to compete for market shares (Carlsson, 2013). Competition has taught, or perhaps even forced public media companies to adapt to demands and needs of the same public that funds them (Carlsson, 2013). This increasingly complex media environment puts new demands also on the regulation of PSM. While regulation gives Nordic PSM:s a set of rules under which the companies must abide by, it is generally appreciated and accepted that a certain distance between political authorities and the day-to-day operations must be obtained (Carlsson, 2013).

3.2 Organizational structures

The structure of a company answers to questions such as who reports to whom and how information flows across the organization (Nahavandi et. al., 2015). Structure is essential in order to make possible the effective performance of the most important activities, and to give necessary support to the staff of a company (Mullins 2013).

There is a close relationship between a company's strategy and organizational structure (Mullins 2013). Structure enables the chosen method of management. Also, structure does not only affect the performance of an organization, but also the morale and overall satisfaction of its employees (Mullins 2013). Therefore, structure arguably plays an essential role in a company's overall success.

Even though there is no obvious right or wrong answer to what structure a company should choose in order to succeed, it is obvious that a poorly designed structure can have a number of negative effects, argues Mullins (2013).

During more recent years, one of the perhaps most visible trends in leadership and business management has been the increasingly popular efforts to eliminate traditional management layers and give more responsibility - and accountability - to the experts and teams themselves (Downes 2019). Self-management skills, taking personal initiative and a Lean/Agile mindset have been shaping most workplaces for quite some time now. Many successful businesses have minimized their management layers and unnecessary bureaucracy in an effort to empower and give more freedom to their experts (Downes 2019).

Nevertheless, however trimmed, lean and agile our organizations might be, hierarchies still exist and play a significant role in how we work and how well the company performs.

3.3 Centralization vs. decentralization

Large and even medium sized companies have to decide on what degree of centralization or decentralization they want to implement into their organizational structures (Mullins 2013). As Mullins (2013) explains, at least some extent of decentralization is needed due to features such as increased size and geographical separation. The main outcome of decentralization is the possibility to delegate decision making and responsibilities within the company, so that sub-units or groups can enjoy a measure of autonomy or independence (Mullins 2013). On the other hand, a more centralized approach is often claimed to have economic and administrative advantages (Mullins 2013). These advantages, however, are often not fully realized and don't lead to actual improvement in service. There is criticism that decentralization leads to longer command chains and a more mechanical structure. The positive sides of decentralization tend to relate more to behavioural considerations (Mullins 2013).

Advantages of centralization	Advantages of decentralization
<ul style="list-style-type: none"> ● easier implementation of a common policy for the organization as a whole ● providing a consistent strategy across the organization ● preventing sub-units from becoming too independent ● making for easier coordination and management control ● improved economies of scale and a reduction in overhead costs ● greater use of specialization, including better facilities and equipment ● improved decision-making which might otherwise be slower and a result of compromise because of diffused authority 	<ul style="list-style-type: none"> ● enables decisions to be made closer to the operational level of work ● increased responsiveness to local circumstances ● improved level of personal customer service ● more in keeping with developments in flatter and more flexible structures ● support services, such as administration, are more likely to be effective if provided as close as possible to the activities they are intended to serve ● provides opportunities for training and development in management ● usually has an encouraging effect on the motivation and morale of staff

Figure 1: Advantages of centralization and decentralization (Mullins 2013, p.518)

Access services management in PSM’s can in other words be considered to be either centralized or decentralized and as Williams (2019) argues, both options have their pros and cons.

According to Williams (2019, p.2), a decentralized approach works well “...when grassroots roles, such as developers or designers, care deeply and are well-trained around the topic of accessibility.” On the other hand, Williams (2019) has found that “it can be difficult to consistently test and measure for accessibility across multiple business units or teams. He also states that it is important to have a clearly defined accessibility program: “Building an accessibility program is key for maintaining a culture of accessibility in the workplace” (Williams 2019, p.2).

Williams (2019) concludes that the most important factors that should influence the decision of whether to go with a centralized or decentralized accessibility program should be your organization’s size, need for rapid product change, or governing policy around accessibility.

3.4 Bureaucracy vs. agility

In today's organizations, independent decision making, and personal responsibility is often highlighted in the leadership and along the production chain. The so-called professionalism ideal is, according to Rose et al. (2015) focused on providing an independent, robust and consistent administration, governed by a rule system based on law, resulting in the public record that is the basis of accountability (Rose et al., 2015).

Having established that access services are an important part of Nordic PSM's mission in terms of serving and inclusion of all citizens, it can be concluded that it is important that the access services themselves are managed and organized in an efficient way.

Efficient management is arguably also key in these contemporary times of rapid change led by disruptive technological innovations such as automatic speech recognition and AI.

“Managerial success factors for e-Government include the importance of management support (Pardo & Scholl, 2002; Altameem et al., 2006; Borman & Janssen, 2013), leadership (Kumar & Best, 2006; Altameem et al., 2006), clarity of vision (Altameem et al., 2006; Garson, 2006; Luk, 2009) and the development of shared common objectives (Lam, 2005; Gauld, 2007).” “It is suggested that IT implementation is made more complex in the public sector by relatively complex decision-making and accountability systems, together with a plurality of stakeholders with many differing objectives (Almarabeh & AbuAli, 2010).”

With the word management, we usually think of the administration of an organization, which can be e.g. a business or government body. This includes the activities of setting strategies of an organization and coordinating the efforts of its employees to accomplish its objectives through the application of available resources, such as financial, natural, technological, and human resources. During the recent few decades, we have been living in a world characterized by a more and more accelerated shift of change (Fillon, G. et al. 2015). Lapointe (1998, p.2) argued more than twenty years ago that *"our environments are more and more complex, more and more interdependent, more and more fleeting, more and more unstable, and more and more unforeseeable. In addition, this shift of change of growing complexity is continually accelerating. Thus, this new context continually requires greater capabilities of adaptation, relegating to us the responsibility*

of our learning, and it is asking for the creation of a culture of continuous change and learning."

In my view, the growing expectations on accessibility and demands for equal possibilities for all genders, races and people of different capabilities and backgrounds is a natural consequence of our quickly evolving societies. In the Nordic countries of highly developed welfare, wealth and superior technological innovation, there are no longer any real attributes to justify why minorities should be worse off than others, in terms of e.g., access to quality media content.

The constantly accelerating demand for change puts obvious demands on administrations in large organizations such as Nordic PSM's. I agree with Senge (1990), that these demands call for learning organizations, where knowledge is generated and actively shared across the organization. Senge's view of building learning organizations is focused around five fundamental disciplines: systems thinking, personal mastery, mental models, shared vision, and team learning (Senge 1990).

4 COMPARING NORDIC PSM:S ACCESS SERVICES

Generally speaking, PSM's way of managing their access services can be categorized as either centralized or decentralized. In other words, the decision making process as well as implementation can be either focused to one place in the organization or, taken to the other extreme, split over several divisions and departments which all execute their own strategies and decisions. Based on the findings of e.g. Mullins (2013) and Williams (2019) it is of significance where within the organization accessibility strategies and decisions are made. Depending on the degree of knowledge and engagement of the personnel in different parts of the organization, it can make a difference in terms of how well the services in question are actually performed.

As became evident in my thesis interviews, Yle's access services were managed in a decentralized fashion, i.e., decisions were made independently from each other, in different departments spread over three of the company's four divisions. At the time of writing this thesis, the company had no overall accessibility strategy. All services were

however produced at Yle's headquarters in Helsinki (Yle has offices in several locations around Finland).

My experience from working with access services at Yle is that awareness and knowledge about accessibility is imperative for a decentralized model to be effective in such a big company and Williams (2019) verifies my hypothesis. If, for example, the web developers do not have enough knowledge and interest in accessibility issues, it is likely that they will not take the visually impaired users into account in their work. This will many times lead to a long and unnecessary circle of complaints from the customers to the leadership to the web developers and coders to fixing code that should and more easily could have been done right in the first place.

The Nordic PSM's all share many similarities. They are all state funded and operated in compliance by state regulated laws or contracts. As far as video content goes, all companies have traditional tv-channels as well as increasingly significant streaming and other online services and mobile applications. All companies also provide extensive content in text format online, although some PSM's are facing more strict regulations on the quantity and quality of their online text content than others.

In order to research how the decision-making processes and organizations differ in the Nordic Public Service Broadcasters, I interviewed the main persons in charge of accessibility services in each company. Unsurprisingly, there were many similarities, especially between Norwegian NRK and Denmark's DR, but the comparison also underlined how Yle, in some respects, differs from the other companies. The most obvious difference lies in Yle's shorter history of working with accessibility questions and perhaps therefore also lack of structure, when it comes to how the access services are managed and executed. I will point out some of the most interesting observations and issues in the following chapters.

Since the Nordic PSM's, their tasks and even their audience sizes can be considered relatively similar to each other, it is interesting to compare the structures of the companies and the services that they provide. I will however only discuss the amounts and qualities of the services on a general level, as extensive research on this topic has already been done (e.g., the EBU's PSM Access Services Survey 2019).

4.1 Access services in the Nordic PSM's

As mentioned in the introduction, the awareness of accessibility and access services has increased during the recent years. This is due to many things, but it is obvious that the Internet, digitalization, and technological inventions certainly have had a significant impact. As stated by Díaz-Cintas et al. (2007 p.11):

That our world has become an information society is one of the results of technological advances worldwide and an idea we have become accustomed to, one that we now actually take for granted.

I agree with Diaz-Cintas et al., that being able to access information anywhere, anytime, is something most of us take for granted nowadays. However, I would nevertheless argue that it is a prerogative for many citizens, but not all. People with disabilities such as hearing, visual or cognitive impairments are more dependent on assisting technological inventions and advances than perhaps the majority of people. Technology is sometimes referred to as a curse, but for many, it is a blessing (Díaz-Cintas et al. 2007).

Rantalainen (2019) argues that the Internet revolutionized the lives of blind people in the 1990:s, as they were suddenly able to use computers equipped with screen readers and other assistive technologies. But a downside to the quickly evolving information consumer society is that many might feel left behind, as not all people adapt to new things as swiftly as others (Díaz-Cintas et al. 2007). I know through my work at Yle, having met many hearing and visually impaired people, that feeling like an outcast can have an enormous impact on peoples' lives. "Access to information is crucial for participation in the benefits derived from globalization and economic as well as cultural growth" (Díaz-Cintas et al. 2007 p.12).

Innovations like the Internet, digital television, automatic speech recognition and more recently, AI-based solutions have all contributed a great deal to the accessibility of media. Without these solutions, many people would be - at least partially - hindered from consuming the same news, movies, series, children's programmes and other content that is available for the majority (Díaz-Cintas et al. 2007).

One can therefore perhaps argue that it is self-evident that accessibility should be at the core of PSM's strategies. In modern welfare states, people with disabilities should have equal opportunities to consume essential media content. As Sparkle (n.d. p.1) puts it:

Services like live captioning, closed captions, and audio description allow millions of viewers who are Deaf, hard-of-hearing, blind or have low vision to experience and enjoy content.

Sparkle (n.d) continues that "One major benefit of accessible content is a broader reachable audience". Without services for disabled audiences, media companies miss the opportunity of reaching up to 15 million people worldwide (Sparkle n.d.). This should be seen as a significant number of potential customers. My thesis focuses on Nordic PSM's, and Yle in particular, but it is clear that commercial broadcasters and other media companies miss out on a large audience if they do not make an effort to make their content accessible to all.

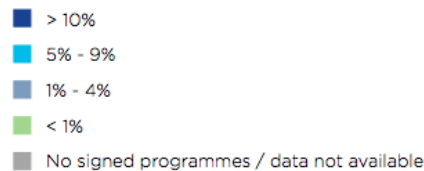
Yle is obliged by the Act on Yleisradio Oy, according to which the company must provide "comprehensive television and radio programming with the related additional and extra services for all citizens under equal conditions" (Act on Yleisradio 1993. Chapter 3, Section 7). Furthermore, it stated in Yle's strategy that the company will "provide diverse services to special groups" (Yle's Strategy. 2020. p.8).

Fulfilling the duties stated in the Act on Yleisradio Oy and the company's own strategy cannot be done without making their content accessible to e.g. the 750 000 hearing impaired (Pekkarinen, Rouhiainen 2014) and 55 000 visually impaired (Näkövammaisten liitto 2019) citizens in Finland. However, according to a recent survey by the European Broadcasting Union, EBU, one might conclude that there is room for improvement in how Yle fulfills the mentioned task (EBU Media Intelligence Service & Media 2019).

ON AVERAGE

6% OF PSM BROADCAST CONTENT IS SIGNED

74% OF PSM ORGANIZATIONS PRODUCING SIGNED PROGRAMMES COVER LESS THAN 5% OF ALL CONTENT



Map 10. Percentage of signed programmes (2019)

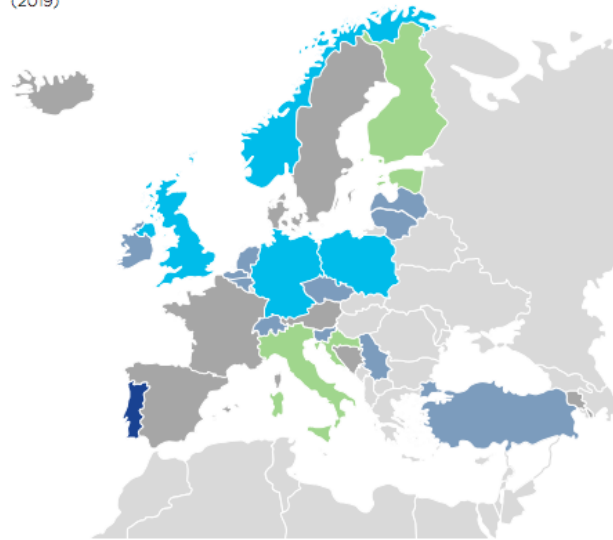
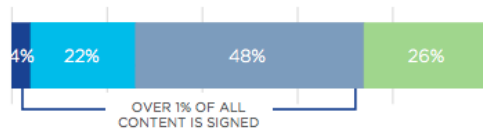


Chart 41. Organizations by percentage of signed programmes (2019, % of organizations)



Based on 23 organizations with available data.

Based on 28 markets, presenting the top percentage in each market.

EBU

OPERATING EUROVISION AND EUROARADIO

EBU Media Intelligence Service & Media - PSM Access Services Survey 2019

Figure 2. Percentage of signed programmes in European PSM's content (EBU Media Intelligence Service & Media, 2020).

The outtake from EBU:s survey (Figure 1.) shows that Yle delivers less than 1% signed programming, whereas the average in Europe is 6%

4.2 Location of the access services

In order to find out if there are any clear advantages or disadvantages of centralized or decentralized access services management in PSM:s, we need to start by researching how access services are organized within the Nordic PSM's. We can then find similarities, differences, strengths and weaknesses in the different models. To some extent, the structures of the other Nordic PSM's were familiar to me through my previous work at Yle, but I had never before had the opportunity to dig into the structures on a deeper level. In this chapter I will attempt to point out the most significant traits to how access services are organized in the companies.

To maintain or not to maintain strong hierarchies, or perhaps better, structures, seems to be a two-folded issue when it comes to managing access services. The reason I make this conclusion is that my interviews showed that in order to reach a high level general mentality of accessibility, the company will initially benefit from strong structures and in some regards even hierarchies. As previously pointed out, there is a lack of accessibility

awareness in essential parts of PSM's that needs to be dealt with. Furthermore, as seen e.g. in DR and NRK, it has taken several years of persistent top-down "lecturing" to reach a point where accessibility can be seen as a part of the company DNA.

Vorozheykina (2019) states that there are professions that struggle more than others to adapt to accessibility requirements and expectations. Her research has found that "the tech community has been less than welcoming to people with disabilities."

My interviews with the Nordic PSM access services managers showed that it may make a difference where within the company hierarchy the access services managers themselves are located.

All of the access service managers that I interviewed considered themselves to be located in the middle management. Everyone reported to one level under the unit director (i.e. unit director minus one). According to Siri Antonsen at NRK, one might still sometimes feel one is "a little bit too low to get people to take you seriously". This goes to show that hierarchical thinking still exists and affects how we perceive decision making and "who has authority".

Having a role close to the company directors might in some cases make it easier for the managers to execute change. For example, as several of the Nordic access services managers testified, when bigger changes need to be made due to e.g., new legal demands, the changes are always presented to the directors, who then decide on the structural and economic changes to be made. These changes can sometimes be very significant and may affect large production chains and big portions of the company. Having a good working relationship between the directors affected and the access services manager may therefore be essential for a smooth decision-making process.

Nevertheless, and perhaps self-evidently, even more important than the title or hierarchical position, was the mandate given to the manager.

My interviewees suggest that the location of the person(s) in charge of the company's accessibility strategy might make a difference in terms of what (quality) services the end user receives. Heidi Sivebæk, Editor of DR:s accessibility and diversity, made the point that placing the role of head of the subtitled department together with the overall head of access services could make one's perspective different than if the access services manager is separated from the production itself. Sivebæk explains:

“Last year Anna [Zettersten] told me about their new way to make subtitles, where they had decided to make subtitles that are best for the ones who cannot hear. That’s not my strategic thinking. The way we think is we try to choose ways that are good solutions for everyone. So I think of people on the Metro who want to watch a video etc. and people who have babies sleeping, and deaf and hard of hearing and so on. But it’s very different ways of thinking and different strategies and it’s funny to see that because I think some of the answers to why we have such different strategies have to do with where we are placed in the organization.”

SVT has an organizational structure that perhaps mostly resembles that of Yle’s. Both SVT and Yle have combined the roles of head of the subtitling department and overall accessibility. However, in August 2020 Yle founded a new accessibility expert position, placed in the Strategy department. More precisely, Yle’s access services expert was placed in the Audience Insight and Customer Experience team (figure 3).

Yle’s aim with this placement was to combine accessibility thinking into product and content planning throughout the whole company.



Figure 3. Placement of Yle’s access services expert (Yle 2020)

The most significant difference between SVT and Yle is the difference in size of the organizations and the services they provide. SVT produces a manyfold amount of access services related content compared to Yle (EBU Media Intelligence Service & Media

2019). Also the personnel working with access services is roughly twice as large at SVT as in Yle. Here, again, I will not present exact numbers of personnel, because they are not comparable on a precise level due to several factors which are not within the scope of my research, but facts about the personnel numbers were obtained during my interviews.

Where Yle has spread their access services between two of the company's four divisions, the other Nordic PSM's have aimed at joining their accessibility related services under one organization. Yle's HoH subtitles, most translations, audio descriptions and spoken subtitles are managed and produced in their Media department, but the news translations and sign language content is managed by the News organization.

From the second half of 2020, all companies except SVT have access services managers that are located within the strategy department. SVT, as mentioned before, is the only company with a combined role, where Zettersten manages both the access services department (personnel and budget) as well as SVT's overall accessibility strategy.

Since Yle has dedicated a specific person to the role as access services expert in 2020, this person has been located in the Audience Insight and Customer Experience team within the Strategy and Insight unit (Figure 3). Hierarchically, Yle's access services expert is located on a level that is unit executive minus two.

Both NRK:s and DR:s access services managers operate from within the Strategy departments. From there, they develop accessibility related strategies, although NRK does not have a specific strategy for their accessibility. Instead, the access services manager at NRK strives to implement accessibility into all of the different company strategies. As an example, NRK strategic head of accessibility, Siri Antonsen mentioned currently working on the company's tech strategy and that *"it is important that they consider our goals and the laws that we have to deliver on when it comes to accessibility"*.



Teknologi-, produkt- og produksjonsdivisjonen

- Digital tilgjengelighetsekspert (Kristoffer Lium)
- Prosesseier for undertekst og tilgjengelighetstjenester (Paul Egell-Johnsen)

Figure 4. Placement of NRK:s access services (NRK 2020)

SVT:s (as well as Yle's) model of managing access services differs from NRK:s and DR:s in that SVT has combined the role of access services manager and translation & subtitling manager. In other words Anna Zettersten, SVT:s head of languages and accessibility carries both the administrative responsibility of the translation and accessibility department, as well as the strategic planning of all of SVT:s access services. The decision-making process is therefore largely concentrated to Zettersten.

Zettersten's versatile department of ~85 employees consist of translators, subtitlers, audio describers, sign language interpreters and product owners, among others. It is Zettersten's responsibility to draw the strategic guidelines (together with the technical managers) for SVT:s access services three years ahead, but as she puts it, in practice this means making sure that the company meets the requirements stated in their broadcasting license.

Zettersten explains that SVT is divided into four divisions; the News division, Programme division, Lead Units (Ledningsenheterna) and Production and Technique (Figure 5).

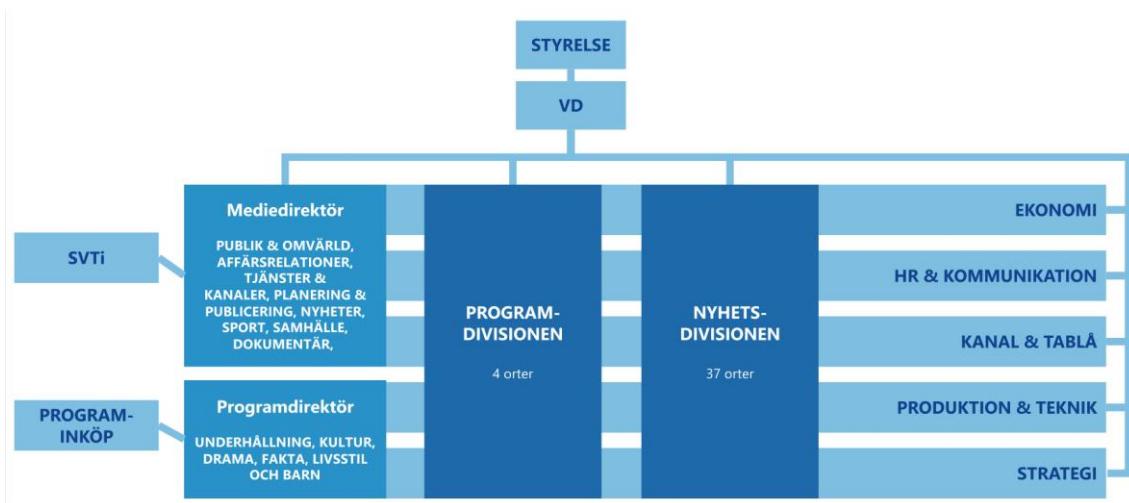


Figure 5. Overhead view of SVT:s divisions (SVT 2020).

The Languages and Accessibility department is situated in the Production and Technique division and the head of the department reports to the Head of Production, which in turn reports to the Technical Director (Figures 5 & 7).

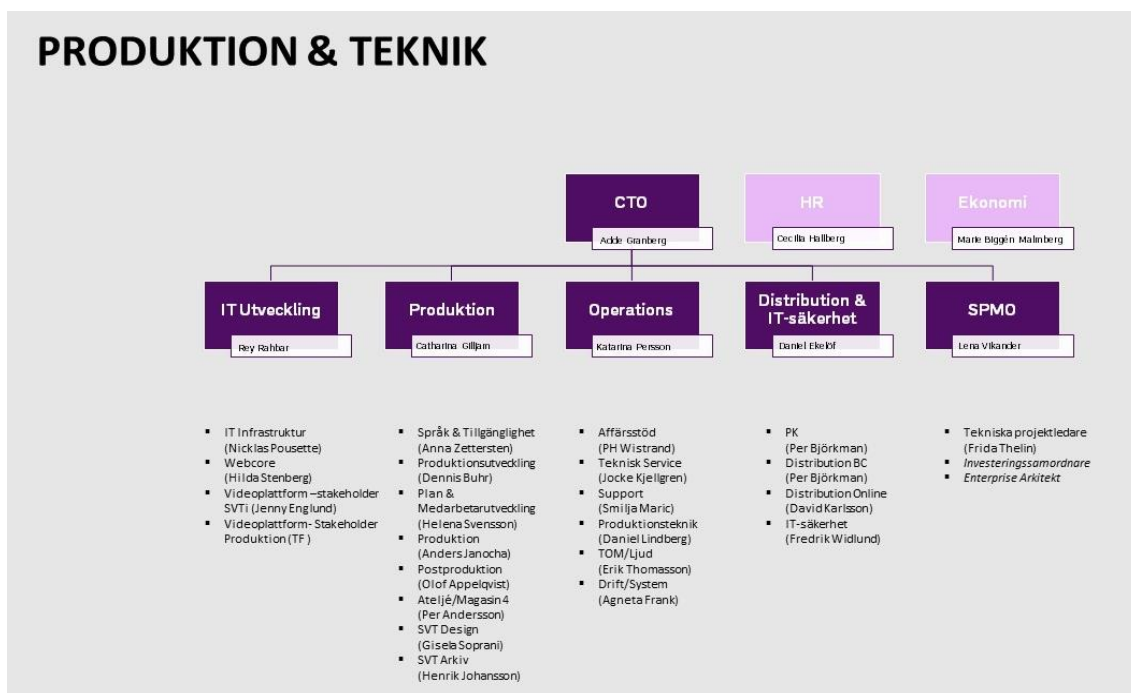


Figure 6. Overhead view of SVT:s Produktion & Teknik division (SVT 2020).

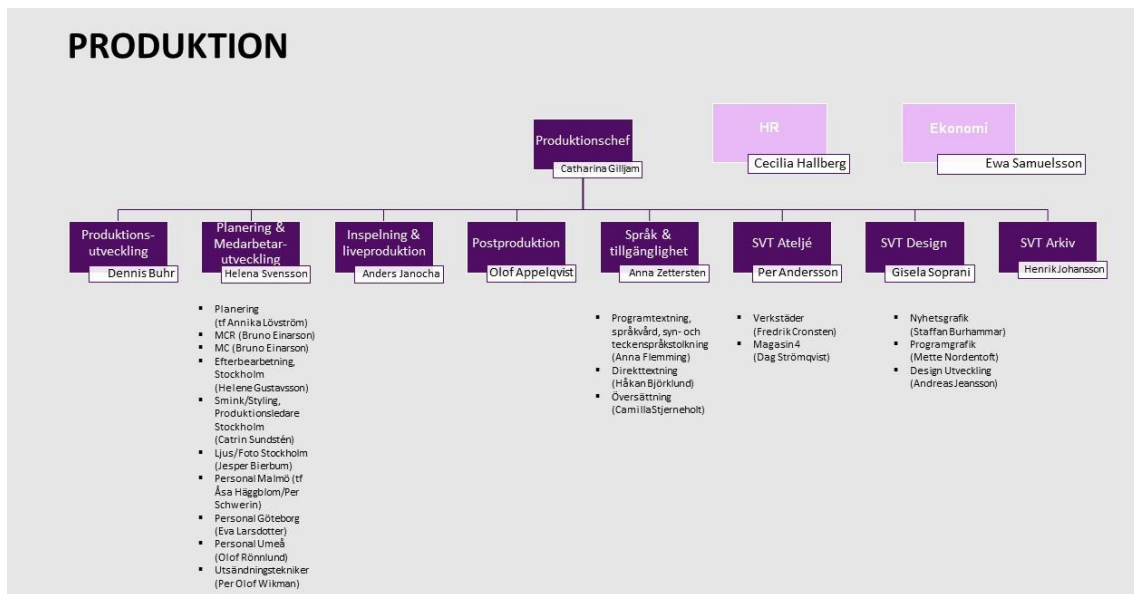


Figure 7. Overhead view of SVT:s Production department (SVT 2020).

4.3 The access services manager

All the Nordic PSM’s access services managers have similar responsibilities. Arguably the most important responsibility of the access service manager, is to ensure that the accessibility tasks stated in the public service contract or legislation are fulfilled. However, perhaps a more visible responsibility is the so called footwork that the access services managers do. A large portion of the manager’s time is spent talking to people, educating and reminding them about accessibility issues.

Something that came up several times in my interviews was the fact that the access services manager cannot and should not have to carry the PSM’s accessibility responsibilities alone. Yle’s attempt to address this issue was to form an internal accessibility network of people either involved in producing access services or otherwise in positions where they can enhance accessibility matters. Building a network of experts is a good way to join forces and get a wider spread over the company, but it also has its risks. If the persons involved in the network do not have their own budgets for implementing accessibility related work, it may easily become a forum of people who agree on matters but cannot take them into action.

According to Zettersten, the current placement and decision-making process at SVT works quite well. She finds that it might sometimes be easy to “slip into the details”,

i.e., get involved in duties that could perhaps better be performed by others in the organization. But her job is essentially to draw the big lines and be the driving force behind SVT's accessibility strategy.

SVT seems to have a rather proactive approach when it comes to implementing their accessibility duties stated in their broadcasting license. As an example, Zettersten mentioned that SVT hasn't waited for demands to provide subtitles for their online content. Instead, they have provided subtitles online since 2012. They have also had the ability to provide live subtitles online since 2017, even though there is no demand for this in the broadcasting license. The strategic decisions that Zettersten has made together with SVT's directors have led to these results, and she said that the guidelines that the top corporate management have laid out have been very clear. Zettersten mentioned a constant cooperation between herself, the line managers, strategy department and the programme management. Even though she felt everyone in the top management including the CEO are well aware of accessibility issues, there were still recurring discussions about e.g., "why we cannot use machine generated translations", especially regarding newly recruited persons.

In 2016, SVT made the strategic statement that "online is as important as broadcast". This immediately led to the decision to start subtitling online content. Zettersten concludes that SVT's company strategy nowadays feels easy to turn into concrete action.

Zettersten seemed very content with the way that the current top management is both interested in, as well as on the other hand also aware of accessibility issues. She found that this is in part thanks to an organizational change that they had made few years earlier, where her department was moved from the news division to Production and Technique. According to Zettersten, one significant improvement was the realization in the top management that her department is one of SVT's content producing departments (as opposed to being merely a supporting function? Editor's note).

Simultaneously with the previously mentioned organizational change, SVT's audio descriptions and sign language interpretations were also combined with Zettersten's department. She now sees this change as having been a new spark of sorts for her own department. Joining forces can often be an excellent way to increase so-called cross-pollination, awareness, learning and general employee morale (Normand 2018).

Zettersten also mentioned that extreme events in the world, such as the Covid19 pandemic tend to raise the internal interest in access services, which concur with my own observations as head of Yle's access services department.

According to Zettersten, a turning point in the content producing personnel's accessibility awareness and the needs of the translators and subtitlers in particular, happened in 2014 when SVT was required to subtitle 100% of their tv-content. Today Zettersten finds that it is self-evident for most people that all content has to be subtitled.

When it comes to SVT's web development, Zettersten finds that accessibility awareness is lagging by 7-8 years compared to the rest of the company, but that the situation is slowly improving. Her testimony verifies the point made earlier in this thesis, that there seems to be a gap in web developer's knowledge and interest in accessibility issues.

She does mention one exception though - a developer who took web-related accessibility matters upon himself and now guides the development teams in accessibility matters. Zettersten concludes that having this type of "virtual" person (not belonging to any specific team) has been a good model for SVT.

4.4 Challenges

Public service media companies and the media industry in general are arguably in the midst of a disruptive era. With multinational streamers taking large market shares and many countries struggling with their economies, many are questioning the purpose of traditional media and PSM's in particular. Many things from income structures to technical inventions have also changed and are changing the markets in ways that force traditional media companies to react quickly.

When asked what the access services Zettersten sees as the greatest access services related challenges, she immediately answered machine learning, artificial intelligence and demands that the news organization puts on automatic transcribing. Finding the balance between the quality issues related to completely automatically generated subtitles and the need for manual input is difficult. On the one hand you have speed and cost benefits, and on the other quality issues. Antonsen, however, seemed to have an opposite view, whereas she felt that machine learning and other new technological inventions more as opportunities rather than challenges. She did, nevertheless, think that

the aforementioned tech inventions were likely going to have a significant impact on workflows.

As another challenge Antonsen named “getting it [accessibility] into the DNA of the people from the top to the floor”. By this she meant that getting to a point where programme producers who are in the studio are actually conscious about making the programme accessible for radio as well. “Then we don’t have to put money on making audio descriptions for people who cannot see. So the challenge is making a cultural change happen, and that takes time.”

For DR, Sivebaek mentioned the question of moving users from flow (traditional broadcast) TV to online services and streaming. Demands are high to increase accessibility on both platforms, while the budget’s for doing so are not increasing. At the same time Sivebaek felt that DR could provide much better service for their customers online, if only they had efficient ways of teaching the customers to take the necessary technological leap.

4.5 Yle in comparison to their commercial competitors

While it is obvious that Yle, given its public service nature, has broader accessibility obligations, it might nevertheless be interesting to take a brief look at how the company compares to its commercial competitors. A valuable resource for such a comparison is Annanpura’s (2019) analysis that the company published in September 2019.

Annapura is a company that provides consulting services in accessibility issues for state officials and other organisations in Finland.

Annapura analysed the accessibility of Yle’s and the Finnish commercial tv channels’s online services, at the request of the Finnish Transport and Communications Agency, Traficom (Annapura 2019). The report gives a comprehensive overview of the current state of Yle’s and other Finnish broadcaster’s streaming services accessibility functionalities. It is a summary of tests made on the accessibility of streaming services for hearing and visually impaired users and other users with special needs (Annapura 2019).

Although Yle has superior accessibility functions on their streaming services compared to its commercial rivals, the report nevertheless found some severe problems in their

services. Going into the details of the errors is not within the scope of my research. However, I will conclude that the report clearly shows what was stated earlier in Vorozheykina's (2019), namely that there are obvious indications of issues with the tech developers not commemorating people with disabilities thoroughly enough. Annanpura's report findings are another indication of the importance of my research. Looking into the differences in PSM's and commercial media companies' access services would be an interesting topic for further research.

5 CONCLUSIONS

Regardless of one's personal background, preferences or physical abilities, I believe most people would agree that making the content produced and distributed by PSM's accessible for all, is at the core of what public service is all about. Taking the necessary steps and measures to implement the access services into the appropriate strategic planning, production lines and workflows should therefore be a top priority for any PSM management.

Having to constantly convince employees who are less aware of accessibility issues and how access services are produced in general, can be an exhausting job, not to mention an ineffective way to manage a service. As all of the Nordic PSM access services managers have testified, it has taken years of hard work to implement accessibility into the planning, workflows and general mindset of PSM's organization culture. My research shows that finding the correct location within the organization location from where access services are managed, plays an essential role in how successfully the services are produced.

While many PSM employees have a good general understanding of accessibility services and the significance of them, it seems that web designers and other types of technical developers sometimes lack awareness of the matters. This needs to be taken into consideration in the strategic planning and implementing of the services, but maybe more importantly when planning the continuing education for the company's employees.

Since there are differences in how the Nordic PSM's are organized and managed, there is most likely not just one right answer to where access services should be managed and produced. My research does, however, point to the fact that an organizational location in close proximity to the programme planning and production teams seems vital. If a

company has a specific access services expert role, this should be strongly connected to the department planning the overall company strategy. Access services should not be thought of as an appendage to the rest of a PSM company's products, something that is remembered right before a programme or service is published. The better access services are integrated into the overall company strategy and the earlier in the planning stage access services are taken into account, the better the end result will be.

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APPENDICES

Appendix A – interview with MP May 19th 2020

CF: Miten kuvailisit nykyistä tehtävääsi ja vastuita Ylessä?

MP: Tällä hetkellä ajattelen että Ylen sisällä tärkeä työtehtävä on pitää saavutettavuutta ja tämän merkitystä ja tärkeyttä esillä. Kertoa eri instansseille mitä hyötyä siitä on Ylelle ja sen tuottamille palveluille. Auttaa Yleläisiä tekemään työtään saavutettavasti. En voi Yleläisten puolesta tehdä duuneja, En voi tehdä yksinäni koko Yleä saavutettavaksi, mutta voin olla sparraajana ja auttaa heitä. Käyn myös esim. Webinaareissa puhumassa. Yle tuottaa jo palveluita ja meillä on pitkä historia ja osaaminen, ollaan yhteiskunnassa arvostettu saavutettavuustoimija. Mun tehtävä on myös tuoda tätä työtä esille ja olla PR henkilönä Ylestä ulospäin. Linkkinä Ylen ja asiakkaiden välillä.

CF: Onko sinulla suoria alaisia?

MP: Ei. Ylessä on myös saavutettavuusverkosto, joka on puoliaktiivinen toimija. Voisi olla aktiivisempikin. Saavutettavuuteen nimetty joukko joka toimii saavutettavuuden edistäjänä esim. siinä , että miten viestinnässä kerrotaan joka kk jotain saavutettavuudesta talosta ulospäin. Tai jos jotain pitää järjestää, niin kuka pystyy järjestämään. Toistaiseksi verkostolla ei ole päätäntävaltaa tai resurssointia. Tärkeimpiä verkoston töitä tänä vuonna on ollut muokata Ylen strategiaa ja miten sitä konkreettisesti mitataan. Verkosto ei tee esim. Konkreettisia päätöksiä esim. Kuvailutulkkauksista, vaan tekee ainoastaan suosituksia.

CF: Kuvaile uutta organisaatiota, jossa tulet työskentelemään, eli mihin sijoitut yhtiön sisällä

MP: En tiedä siitä oikeastaan mitään vielä tässä vaiheessa. Sijoitun uuteen Strategia ja asiakkuus organisaatioon. Siellä Asiakkuus ja asiakaskokemus -alaosastoon. Uusi organisaatio on yksikkö jolla on tosi vahva tekemistä ohjaava rooli. Tulee toimimaan tarkasti sisältöä tuottavien yksikköjen rinnalla ja kanssa, jotta asiakkuuskokemus olisi ikään kuin yksikkörajat ylittävä. Saavutettavuusvastaavan toimen tulisi tällöin olla sellaisessa yksikössä joka tekee yhteistyötä kaikkien sisältöä tekevien yksikköjen kanssa. Saavutettavuus ei ole vain yhdessä paikassa tehtyä työtä, vaan pitäisi läpäistä koko yhtiö kaikkineen. Asiakaskokemus on se yksikkö jossa saavutettavuusvastaava on, on hieno lähtökohta jo sellaisenaan.

CF: Mihin sijoittaisit itsesi yhtiön sisäisessä hierarkiassa; keskijohto jne.? Minkälaiset välit sinulla on ylimpään johtoon?

MP: En tule raportoimaan suoraan xx:lle. Mun kohdalla uudessa organisaatiossa näyttää olevan joku joka on asiakaskokemuksen... Mun paikka on eri kuin yleisöasiamiehen esim. On välissä joku mun ja johtajan välissä.

Erityispalveluista vastaava johtaja on edelleen Ismo Silvo. Ismoon on ihan suorat välit. Jos on joku asia mikä pitää hoitaa suoraan, sitten hoidetaan. En tee sellaista työtä joka olisi suoraan johdon kanssa, en esim. Raportoi suoraan johdolle. Kiinnostavaa nähdä muuttuuko tämä kuvio jotenkin uuden organisaation myötä. Itse ehkä toivoisin muuttuvan niin että olisi selvemmat sävelet mitä multa odottaa ja toivotaan. Mitä yhtiön johto olisi valmis budjetorisesti satsaamaan. Tällöin mun olisi helpompi viedä projekteja eteenpäin. Olisi ehkä vähän johdetumpaa. Tällä hetkellä se mikä tulee eteen se hoidetaan. Tai jos huomaan että jotain pitää hoitaa. Olisi hyvä jos myös johto sitoutuisi tiettyyn kehityskaareen, tällöin myös raportointivastuu olisi toisenlainen.

Koska yhtiössä on päätetty että on yksi saavutettavuudesta vastaava johtaja, niin siksi toimin hänen kanssa. En ole esim. Missään tekemisissä Merjan kanssa.

Mitä mieltä siitä että olet eri organisaatiossa kuin Ismo? : Mielenkiintoinen kuvio, kun Ismolla ei enää omaa organisaatiota. En osaa sanoa toisiko se mitään lisää. En pelkää esim. raja-aitoja. En näe miksi pitäisi olla samassa yksikössä. Ehkä enemmän toivon sitä organisaatiomuutoksesta, että jos Ylessä tavoitellaan rajat ylittävää asiakaskokemusta, niin silloin saavutettavuuden pitää olla siellä missä tätä pohditaan, jotta se olisi verrannollinen muuhun asiakaskokemukseen. Henkilökohtaisesti toivon myös että opin tästä uudesta kollegiaalisuudesta. Organisaatio ei ole koskaan ollut este, mutta toivon saavani uutta osaamista.

Johto on hyvin perillä siitä, mikä arvo saavutettavuudella on ja miksi meidän pitäisi sitä tehdä. Ei pelkästään Ylen hallitus, vaan Ylen strategiassa olevat vastuullisuustavoitteet joihin saavutettavuus otettiin omaksi tavoitteeksi, jossa Yle pyrkii saavutettavuuden edelläkävijäksi oli saanut sellaista intoa ja iloa että eihän Yle voi yhtään vähempää tavoitella. Johdolla on todella vahva aatteellinen ja ymmärrys merkityksestä ja saavutettavuuden onnistumisen arvosta. Mutta se että jos mietitään konkreettisesti muistaako kaikki mikä on kuvailutulkkauksia tai äänitextitys, niin ei välttämättä. Mutta se on mun duuni sparrata myös johtoa. Mun tehtävä olla näistä kartalla. Johdolta tarvitaan hyväksyntä ja kannustus ja hengen luominen että tää on hyvä asia ja tätä tulee edistää.

CF: Onko muu johto samoilla linjoilla?

MP: XX:llä on hyvin vahva ajatus saavutettavuudesta. On ollut selvää että joudumme satsaamaan asioihin jotka eivät tuo määrällisesti valtavasti asiakkaita mutta on palveluna tärkeitä. Ymmärtääkseni myös XX ymmärtää saavutettavuuden päälle. En ole johdolta enkä keneltäkään muultakaan kuullut että saavutettavuus olisi negatiivinen asia. Kukaan ei sano että ei tollasta. Ongelma tulee ehkä siinä miten asiat etenee käytännössä.

CF: Entä muuhun taloon, ketkä koet olevan tärkeimpiä sidosryhmiä talon sisällä?

MP: Saavutettavuusverkosto on tärkein. Verkostossa on laaja näkemys yleistä ja tavoista tehdä. Toimii mulle sparraajana. Toinen on viestintä ja asiakaspalvelu. Tulee paljon kysymyksiä esim. Tekstityksistä ja aspa kysyy multa tosi herkästi. Annan vastuksia tai ohjaan eteenpäin. Puhutaan tästä roolista talosta ulospäin, en tietenkään tee tätä yksin. Tiivis yhteistyötaho tällä hetkellä on myös EA:n kanssa koska kehitetään kovaa vauhtia kuvailutulkkauksia. Myös lakiosasto tärkeä. Tukitoimintojen kanssa ja sisällöntuotannon kanssa mitä asia milloinkin koskee. Sekä tietenkin Ismo johdosta.

CF: Onko Ylellä saavutettavuusstrategiaa ja jos on, niin miten kuvailisit sitä?

MP: Strategia ottaa kantaa saavutettavuusasioihin paremmin kuin aikaisemmin. Eli meillä on vastuullisuustavoitteet jotka on hyväksytty tammikuussa ja vasta eilen ollut strategia ylempien portaiden käsittelyssä. Eli meidän pitää parantaa joka vuosi palveluita. (ks. Minnan jakama tiedosto johon voi viitata). Saavutettavuus mainittu kahdessakin kohdassa strategiaa. Pitää myös lisätä monimuotoisuutta, jossa mainittu esim. Saavutettavuus nr. Viitosena. Yle pyrkii saavutettavuuden edelläkävijäksi Suomessa. Yleläisten pitää lisätä omaa tietoisuuttaan saavutettavuudesta.

Monimuotoisuus on jo tänä vuonna painopiste.

CF: Kuka tai ketkä osallistuu saavutettavuusstrategian luomiseen ja minkäläisen työskentelyn kautta se luodaan?

MP: Vetäjänä I T-J. Vuosi 2020 on pohjavuosi josta lähdetään liikkeelle. Minä, XX Radiomanista, MK viittomakielisistä, Ansku viestinnästä, sellaiset tahot jotka on keskeisiä jonkun palvelun tuottajia Ylessä. Ohjelmatekstitysten mittaaminen on helppoa. Pohdittu erilaisia mittareita paljon. Radio on hankala kaiken kaikkiaan. (Minna esittelee strategista työtä)

CF: Miten strategia jalkautetaan?

MP: Hyvä kysymys, koska siihen ei ole mitään "strategiaa". Tää on ollut vasta eilen hallituksen hyväksyttävänä. Yhtiötason tekemisen puitteissa ollaan tosi lähtökuopissa. Mun tärkein tehtävä on kiertää ylessä ja tehdä tätä tutuksi. Kyllä sit kun ihmiset tietää ja ymmärtää alkaa tulla tuloksia. En esim. Odota suuria mullistuksia vielä tänä tai ehkä ensikään vuonna. Kierrän kaikkien yksikköjen joryt. Kerron mitä hyvää nyt jo on tehty saavutettavuuden eteen. Pakko tehdä pohjatyötä ensin. Hienoa että Koronasta huolimatta pystynyt tapaamaan esim. Webinaareissa kun ei voi kiertää fyysisesti tapaamassa ihmisiä.

CF: Miten kuvailisit saavutettavuustehtäviin liittyvää päätöksentekoprosessia Ylessä? Mihin päätökset perustuvat? Lakiin, arvoihin jne.

MP: Linjapäätökset tehdään johdossa. Esim. LanguagePlay, joka maksaa XX€/v. Oli I:n ja J:n päätös. Mitä tapahtuu prosessissa sen jälkeen, voi olla että olen POna projektissa mutta en pysty tekemään päätöksiä esim. Tekniikan puolesta, vaan esimiehet päättävät kuka tekee mitään ja millä tavalla. Päätökset tehdään niissä yksiköissä mitkä tuottavat substanssia palveluun.

Päätökset perustuu velvollisuuden tunteeseen... Ja arvoihin. Jos on laki, se päätökset perustuu siihen että lakia on noudatettava. Jos on johdossa linjattu että jotain edistetään se päätöksenteko perustuu siihen että on jotain olemassa... Sitten on esim. Ruotsinkieliset kuvailutulkaukset joista en edes tiennyt että niitä on. Niihin liittyvä päätös on nimenomaan Ylen arvot. Tämä oli yhden ihmisen intressin varassa. Yritetään

miettiä miten tällainen saataisiin arkipäiväksi. On siis myös henk kohtaiseen intressiin perustuvaa, mutta se on pienemmissä määrin. Pääosin menee velvollisuuteen... Itse käytän velvollisuuden tunnetta omana tukenani. Meillä velvoittaa Yle-lakia, oma strategia, palvelulla yleisöä.

CF: Kuinka hyvin ylin johto on mielestäsi perillä talon saavutettavuusasioista ja kuinka kiinnostuneita johtajat ovat?

MP: Johto on siten hyvin perillä, että tietää mikä arvo saavutettavuudella on.

CF: Entä yhtiön muu henkilöstö?

MP: Kaikki sanoo että tosi hyvä ja tärkeä juttu, mutta sitten kun pitäisi oikeasti toimia asiat siirretään toiselle. Kukaan ei ota palloa. Yle on hajanainen talo, mikä voi vaikuttaa. Esim. koodarit on iso osa verkon saavutettavuutta. Koodareille ollaan harkittu saavutettavuuskoulutusta, jotta voisivat hoitaa hommansa paremmin ja moni on sanonut että joo tosi mieluusti, mutta en osaa. Ihmisten tavoittaminen on tosi vaikeata koska he ovat tosi moniaalla pitkin Yleä, ja mä en pysty heitä kaikkia tavoittamaan eikä ole ketään sellaista tyyppiä joka sanoisi että joo mä voin ottaa tästä pallon että mä operoin näiden kaikkien kanssa. Monet saavutettavuuteen liittyvät asiat on aika isoja ja hähmäsii, ja vaatii selvittelyä ja kyselyä. Ne ei ole sellaisia että mä teen ton ja ton vaan vaatii selvittelyä ja rahoja. Siksi mun työpöydälle kaatuu paljon operatiivisia asioita ja oon miettinyt että olisi hienoa jos olisi joku joka osaisi sitä substanssia ja pystyisi viemään asiaa eteenpäin. Vähän samaan tapaan kun on KäVe jossa operoidaan tekstitysasian kanssa, jossa tsiljoona pikkuasiaa. Eli on joku taho joka pystyy kantamaan vastuun siitä puolesta. Ja sama on monessa muussa asiassa, eli tarvittais joku joka on niin kiinni ja sitoutunut jonkun asian saavutettavaksi tekemiseen.

K: Miten ton vois ratkaista? V: Ei varmaan organisatorinen ongelma vaan enemmänkin esim. Saavutettavuusvastaavan kykyyn löytää osaajat ja delegoida asiaa. Tällä hetkellä eteen tulevat asiat hoidetaan, mutta toivon että kun tulee uusi organisaatorakenne ja aletaan viedä asioita yhtiöyhtenäisesti niin sieltä ehkä saa jotain työkaluja joiden avulla voi viedä asiaa eri yksiköihin. Tarvittaisiin siis henkilö jolla on natsat delegoida sekä ymmärrys siitä että se on "minun tehtäväni hoitaa". Tarvitaan myös esim mittareita joilla mitataan tavoitteiden toteutumista, esim. Verkkosaavutettavuuden osalta. Esim. automaatio jolla näkee minkälaisia pojoja sun tekemä verkkosivu saa. Toinen on vuosittaiset manuaaliset tarkistukset joita ostettaisiin talolle. Pitäisi olla pohja johon verrata. Pitäisi saada saavutettavuusevaluointi. Nyt on ekaa kertaa (XX) taho joka on tarttunut palloon ja sanonut että mä maksan evaluoinnin koska tää on asiakaspalvelu. Positiivinen merkki, tietoisuuden lisäämistä. Saavutettavuudelle tulee arvoa myös ihmisten mielissä ja sellaista työtä vielä vaaditaan talossa lisää.

CF: Kuinka keskitettyä päätöksenteko isoista linjauksista saavutettavuusasioista on? Tehdäänkö palveluihin liittyviä päätöksiä monella puolella yhtiötä, itsenäisesti eri osastoilla? Onko näiden osastojen välinen yhteydenpito tiivistä?

MP: Ei ole ollenkaan keskitettyä enkä tiedä minkä asian pitäisi ollakaan keskitettyä tai ei-keskitettyä. Esim. tekstitys joka on lakivelvoitteinen ja pitää varmistaa että kaikki on tekstitettyä ja Areena-live saadaan tekstitettyä. Silloin on tosi tärkeää että päätöksenteko ja visiointi on jollain tavalla keskitettyä. Se ei voi jakaantua kaikkien sisältöä tekevien

harteille. Tämä on erityisen vahvasti säädelty saavutettavuustoimi ja silloin tärkeää että on osasto ja tiimi joka tekee sekä johto jolla on budjetti ja päätösvaltaa. Et se kaipaa sellaista... Mutta onko vaikkapa kuvailutulkkaus... Budjetti ehkä joo. Haaveilen että saataisiin sopimukseen mitkä kuvailutulkataan ja jalkauttaa tuontantoihin. Mut en tiedä tarviiko olla keskitettyä johtoon asti vai voiko olla tuotannoissa.

CF: Mitkä ovat mielestäsi suurimmat haasteet Ylen tavassa hallinnoida saavutettavuuspalveluja?

MP: Koen. Riippuu just toiminnoista. Verkkosisältöjen saavutettavuus on just tollaista. Sitä tehdään Lusissa, UAssa, Svenskassa, missä kaikkialla. Koodareita on pilvin pimein ja niillä varmaan kaikilla päällikkö tai johtaja jota ehkä jotenkin saa kiinni.. Mutta se on tosi hajanaista. Voin sanoa että esim. Huomisesta asti kaikki verkkopalvelut pitää olla WCAG21.0:n mukaisia. Mut tiedän et se ei ole hedelmällistä, koska ihmisten pitäisi itse sitoutua asiaan. Siksi ajattelen että mun pitää kertoa heille saavutettavuudesta.

Jos meillä on UX-porukka niin heillä pitää olla natsat sanoa esim. Koodariporukalle että heillä pitää olla näistä osaamista.

Mutta vaikka olisi kiva tehdä keskitettyjä päätöksiä se on tosi vaikeaa, koska ihmiset tekee niin erilaista työtä ja on erilaiset tavat tehdä. Pirstaleinen historiakin näkyy. On paljon sellaista mitä en tiedä koska en ole näiden asioiden osaaja.

CF: Mikä on erityisesti Ylen tavassa toimia haasteellista?

MP: Saatan sanoa että sanon jotain mikä ei olekaan Ylen tapa toimia. Koska en tarkalleen tiedä mikä on Ylen tapa toimia. Mut ehkä pirstaleisuus ja hajanaisuus. Samaa duunia voi tehdä monessa eri paikassa ja se toimii koska hommia tehdään omilla tavoillaan, mutta jos kaikkia näitä tahoja pitäisi halkaista joku asia kuten saavutettavuus se voi olla hankalaa. Se voi myös muuttua ja toivon että siihen kehittyy joku malli jolla voidaan viedä laajoja asioita läpi. Myös saavutettavuuden merkitys ymmärretään että se koskee myös mun duunia. En tiedä onko erityisesti Ylen asia että kaikki ymmärtäis että koskee myös mun duunia.

Voi olla että on siiloja jotka estää asian edistämistä, mutta en ole varma onko näin. Saavutettavuutta ei ole koskaan aikaisemmin yritetty edistää näin laajalla tavalla. Uusi organisaatorakenne pyrkii ainakin vähentämään esteitä ja tuomaan saavutettavuuden sellaiselle tasolle että jos työtä osais tehdä hyvin niin mahdollisuudet kyl varmaan olis ihan mis vaan...

CF: Entä mikä toimii mielestäsi erityisen hyvin?

MP: Näen siinä potentiaalia verkostotekemisessä. Musta tuntuu että saavutettavuusverkostossa on paljon osaamista. Se ei ole sellainen työkalu jolla voidaan tehdä kaikki asiat, mutta se on sellanen sparraaja... Verkostomainen tekeminen on musta ollut tosi kiva ja mun työtä helpottava ja ilahduttava. On porukka joka keskittyy tietyin välein saavutettavuusasioihin ja pitää niitä tärkeinä. Verkostoa pitäis vielä kehittää niin että siinä olis mukana myös sellaista väkeä jolla on enemmän sananvaltaa. Tai verkoston roolia pitäis vahvistaa. Että vaikkei ole johtajatason väkeä ne tietää asioista ja voisi sanoa että nyt tätä pitää edistää jne. Välillä tuntuu että painoarvo ja halu

tehdä päätöksiä vois olla kovempi.

CF: Mitkä yleisesti ottaen ovat Ylen suurimmat tulevaisuuden haasteet saavutettavuuden osalta?

MP: Alustat. Kaikki erilaiset alustat. Se minkä kanssa Yle taistelee muutenkin että miten Yle tavoittaa kaikki ne katsojat jotka pitää tavoittaa. Miten siinä uudessa aina on mukana saavutettavuus. Verkon seuraava palvelu tulee olemaan Yle Live ja oon tavannut tätä porukkaa ja kysynyt miten he ottaa mukaan saavutettavuuden ja miten uusissa palveluissa ymmärretään että saavutettavuus on monta asiaa. Saavutettavuus ei saa himmailla mitään kehitystä.. Mutta se on haaste että yhtiönä tavoitellaan niin vaikeassa maailmassa katsojia. Koko ajan tulee jotakin uutta. Sama pätee melkein kaikkiin saavutettavuusaspekteihin että miten saadaan kaikki palvelut toimimaan hyvin myös uusissa tilanteissa.

Appendix B – Interview with AZ May 19th 2020

CF: Hur skulle du beskriva ditt jobb och ansvarsområde inom SVT

AZ: Avdelningschef / huvudtjänstägare för språk och tillgänglighet. Omfattar översättning av språk främst från, men även i viss mån till andra språk. Textning, förproducerat, nyhetstextning och direkttextning, syntolkning och teckenspråkstolkning. I rollen ingår personalansvar för gruppchefer (3, ska bli 4) men även annan administrativ personal: planerare och produktägare, verksamhetsanalytiker. Producerande personalen har egna gruppchefer. Arbetsmiljöansvar och personalansvar ingår. Budgetansvar för helheten. Gruppcheferna har ansvar för sina egna kostnadsställen.

Strategiskt ansvar för att dra ut riktlinjerna för ca. 3 år framåt. Men i praktiken blir ju att se till att vi har siffrorna till sändningstillståndet. Om man vill kan man ju tänka lite längre fram än så.

CF: Hur många underlydande har du?

AZ: Ca. 85 pers på avdelningen. Direkt rapportering till Anna, ca. 10-15 pers. Avtal med 7 olika firmor av vilka flera arbetar i SVT.s utrymmen, så i praktiken runt 100 pers. Inga direkt anställda frilansare. Men i praktiken blir det så att de frilansare som kommer på uppdrag till huset är samma personer så cheferna och ansvariga personer får ett anställningsliknande förhållande.

CF: Beskriv organisationen du leder och hur ni är placerade inom bolaget?

AZ: Fyra enheter: Nyhetsdiv. Programdiv. Ledningsenheterna och Prod och teknik. Vi ligger under Prod och teknik, under prod och teknik direktören. Sen förgrenas vi ut till ett antal chefer som har chefer under sig. Anna rapporterar till produktionschefen, som rapporterar till teknik direktören som rapporterar till VD:n.

CF: Var skulle du placera dig i den interna hierarkin - mellanchefer?

AZ: Ja

CF: Hur skulle du beskriva ditt samarbete med högsta ledningen?

AZ: Normalt försöker vi "hålla linjen". Men just för språk och tillgänglighet har man en "lina" med programledningen, som programbeställare och programchefer. Det finns en i programledningen som är programchef och programbeställare för nyheter och samhälle, som har ett ansvar för tillgänglighetsjänster inberäknande översättning. Vi har väldigt mycket att göra med varandra, som inte linjen lägger sig i s.a.s. Vi t.ex. Väljer ut 2 ggr i året vad som ska teckenspråkstolkas och syntolkas, tillsammans med andra roller. Strategiavdelningen har vi också ett samarbete med. De ansvarar för dialogen med

intresseorganisationerna; hörsselförbundet, synskadade och döva och så. Under coronaepidemin har det kommit beställningar på produktion direkt från företagsledningen. Bl.a. versionering av en 5min nyhetssändning varje dag till engelska och arabiska. Egentligen är ju meningen att man ska hållas i linjen av tjänster, men ibland går det utanför det.

CF: Hur skulle du beskriva ditt samarbete med resten av bolaget, vilka avdelningar samarbetar du mest med?

AZ: Lätt att halka ner i detaljerna. Men jag ska egentligen prata i stora drag. Det hjälper att vi har en tjänsteorganisation där alla har sina specifika uppgifter. Konkreta behov, information etc. Spelar inte så stor roll hierarkiskt var man då sitter i linjen. Då får man direkt svar av den som kan göra nånting åt frågan. Förut skulle man upp hela vägen i divisionsnivå. Vi är på väg mot nånting riktigt bra faktiskt!

Annars har man kontakt med programproducenter. De andra som ingår inom produktion, där efterbearbetning, inspelning och live jätte viktiga områden för Annas verksamhet.

CF: Har SVT en specifik tillgänglighetsstrategi och hur skulle du isåfall beskriva den?

AZ: Jag driver arbetet kring tillgänglighetsstrategin. Sändningstillståndet: vad ställer den yttersta uppdragsgivaren för krav och hur ska vi svara upp mot det. Tidigare fanns det t.ex. Inga krav på live. I slutet av detta år ska det komma krav på live, men då har SVT inte väntat på att de nya kraven, utan arbetat på online redan i många år. Sedan 2012 är allt som är textat i tv även textat online. Sedan 2015 finns också online exklusiva textningar. Sedan 2017 kan SVT direkttexta online (inte bara streama det som går i broadcast). Strategiska beslut som A med sin ledningsgrupp fattat för att de sett att det är ditåt det går. Det finns en tydlighet i riktlinjerna från företagsledningen. De har blivit allt bättre med åren, framförallt de som kom för tre år sedan. Färre riktlinjer än det varit förut, som nu går ganska lätt att bryta ner så det funkar för egen verksamhet. Har blivit ett bra arbete i företagsledningen med hur man ska applicera de strategiska riktlinjerna. Men det är ett ständigt samarbete med linjecheferna, strategiska projektkontoret, strategiavdelningen, och med programledningen.

Det som påverkar är företagets strategiska riktlinjerna. "Online är lika viktigt som broadcast" 2016 t.ex. Ledde till att de började texta online. SVT vill också vara närmare publiken, vilket lett till att A jobbat för att ha en mer aktiv publikdialog. Inte bara vara reaktiva mot publiken, utan också vara proaktiva. Fokusgrupper etc.

Sen är det också i tjänsteorganisationen har de också en rad portföljer som syftar till olika förbättringar. En heter effektiva medieflöden som är kopplad till leveransproceccerna ska se ut. På sätt och vis är det fler inblandade då man ska fatta beslut nu, än det var då A började för 15 år sedan och cheferna skulle fatta alla beslut själva.

CF: Vill du säga nånting om själva implementeringen av de strategiska besluten?

AZ: Jag har pengarna och resurserna, så det blir en intern affär. Flöden, personal etc. är under min kontroll, men väldigt snabbt berör det ju även andra. Allt hänger mycket ihop men det övriga.

CF: Hur väl tycker du bolagets högsta ledning känner till och är intresserad av tillgänglighetsfrågorna?

AZ: Dialogen är bra. Den ledning som är nu vet och intresserar sig definitivt bäst i tillgänglighetsfrågor (bättre än de tidigare). Det är jätte mycket tack vare att han som nu är chef för prod och teknik bestämde för 3 år sedan (då A:s avdelning flyttades från nyhetsdivisionen) att "det här är en av våra utbudslevererande avdelningar". Har även satsats mycket på att utveckla verktygen. Samtidigt utökades uppdraget att leverera teckenspråkstolkningar och syntolkningar. Då började det märkas i tablåna och utbudet på ett annat sätt. Det var en nytändning för oss. Nu under Covid19 är det jätte stor fokus på framförallt teckenspråkstolkning, men även textning och översättning. Såfort det blir ett extremt läge blir tillgänglighetstjänsterna mer intressanta, för då blir organisationerna också mer alerta.

Både VD:n och de olika direktörerna intresserar sig för och kan en hel del om tillgänglighet. Ändå måste man hålla på och tugga om det här med t.ex. "Varför använder vi inte automatisk översättning?" för nya personer.

CF: Hur är det med den övriga personalen?

AZ: Väldigt blandat. Bland de de program producerande skedde en stor skillnad sedan vi fick 100% kravet 2014. Nu är det helt självklart att allt ska textas. Översättning har alltid varit känt. Sen finns det delar som vår utvecklingsavdelning SVTi där många inte alls har koll på de här frågorna. Även vissa administrativa delar vet inte riktigt... Så inte fullständigt glasklart för alla. Webbutvecklarna: Där finns enstaka individer som har koll. Har blivit bättre sedan nästa för ett år sedan. SVTi har en skitbra person. Och då är det ju tillgänglighet i bredare bemärkelse än vi menar och det som står i sändningstillståndet. Hur funkar t.ex. Den här appen att använda för dem som inte ser etc. Det är jättebra för han kan på ett naturligt sätt prata om tillgänglighet med alla team och produktchefer där. De har även gjort flera beställningar som lett till bra grejer för oss.

Så det blir bättre men är fortfarande lite som det var på övriga bolaget för 7-8 år sen. Då nånting blev bra gjort blev det så för att nån hade ett specialintresse och själv tog På sig frågorna. Där har det varit bra att en av cheferna utsatt en person som lead för tillgänglighet. Han har inget eget team utan är liksom virtuell. Det är en bra modell.

CF: Hur koncentrerat är beslutsfattandet kring SVT:s tillgänglighetsfrågor? Görs det linjedragning på många olika ställen i bolaget, eller är det mer koncentrerat till vissa personer eller team?

AZ: Ja det är jag tillsammans med program beställaren i programledningen och strategi för den tekniska delen. Hon och teknikcheferna.

CF: Vad anser du vara de största utmaningarna med SVT:s sätt att organisera och leda tillgänglighetsservice?

AZ: Just nu då vi jobbar med automatisering och transkribering som vi försöker få in i mycket högre utstretchning både i systemen och arbetssätten. Då är det en utmaning att medarbetarna ska se vinsten i att de får hjälp av automation. Både i systemen, för att slippa gå in och hämta information och filer, men också att kunna dra nytta av att det redan finns en text t.ex. I manus och transkribering. Att bibehålla tron på att medarbetarnas expertis kommer att behövas även när vi har väldigt mycket mer maskiner s.a.s. Det är en jättestor utmaning. Men också att den tekniska utvecklingen inte i bolaget och omvärlden går i takt med juridik, inköp och ekonomi. De ska vrida och vända tillsammans med inköp i flera månader och då har vi redan missat nånting.. Hur ska man få en sence of urgency även i andra delar av företaget som jobbar i ett annat tempo. När det trycks på uppifrån att "det här borde ni kunna genomföra, kom igen nu snabbare takt!" Att kunna ta det lugnt utan att man verkar vara en nay-sayer. Att vi har en plan som vi följer och vi har tänkt på detta mycket längre än ni. Att bygga tilliten att vi kommer dit ni vill, men det kanske inte blir i juli utan januari... En väldigt balansgång i rollerna - att hålla alla välinformerade utan att man håller på och tjarar sönder dem i långa mail.

CF: Tycker du det skulle behövas några större strukturella förändringar? Vad fungerar exceptionellt bra?

AZ: Uppdelningen mellan verksamheten (vi som utför själva uppdraget), strategiavdelningen som pratar mot organisationerna och samhället utanför och produktion och teknik ledningen som jobbar med att få fram bättre flöden, verktyg och system, och programledningen och beställningen -- har på de senaste åren utkristalliserats tydligare vart jag ska vända mig för vad. "Den här frågan tar jag till dig nu" och nånting annat frågar jag nån annan, och med hjälp av de olika svaren jag får kan jag binda uppfattningen att ok då gör vi såhär. Det funkar jätte bra. Ex: då redaktionen t.ex. Kommer med önskemål om att översätta nånting till engelska d.v.s. avvika från SVT:s praxis så kan A ifrågasätta ifall man verkligen vill avvika från praxis - då brukar svaret nästan alltid vara att nej vi vill inte avvika. Men om de trots allt vill göra det så får redaktionen stå för arbetet själva. Tar 5 minuter istf 3 dagar av tjafs som det gjorde tidigare. A: JAG säger att detta är SVT:s praxis och då litar programbeställaren eller redaktionen på att hon vet vad hon pratar om för hon ansvar för det här. Ansvaret och anseendet har blivit starkare på senaste år.

CF: Vad tror du SVT:s största framtida utmaningar inom tillgänglighet kommer att vara?

AZ: ML AI och transkribering. Vi har börjat ge helt automatiska textningar på lokala nyheter. Varje dag 9:05 sändningen. 21st. Som är textade helt med automation. De har aldrig varit textade förut. Både publiken och inhouse finns stor tolerans för att det blir mycket fel. Speciellt dialekter ger fel. Vi har också kommunicerat det på det sättet (att det ska finnas tolerans). "Detta är vårt sätt att få textningar på lokala nyheter".

Utmaningen kommer då vi senare ska börja implementera transkript även på andra produktionstyper. Nånstans går gränsen för att kvaliteten blir mkt sämre, när ska vi använda handpåläggning (manuell rättning), när är det inte alls värt. Allt måste provas i realtid. Kommer ta mkt tid, svåra kvalitetsdiskussionsfrågor. För FL kommer det vara intressant om textning av stora volymer kommer att kunna göras mycket billigare och då kanske FL vill sänka kvalitetsnivån mycket före "vi" skulle vilja göra det. Det är den svåraste utmaningen. Och översättningen såklart som kommer sedan i nästa steg.

Appendix C – Interview with SA May 20th 2020

CF: How would you describe your professional role and responsibilities at NRK?

SA: Strategic head of access. I work with the strategic processes to ensure that accessibility and inclusive design is included in other strategies as well. Now we're developing the tech strategy and it's important that they consider our goals and the laws that we have to deliver on when it comes to accessibility.

CF: How many subordinates (if any) do you have?

SA: No people, no budget, just me. I'm also the person who is in contact with the user groups. We have a user council that meets 3-4 times / year. Consists of 9 different organisations for disabled people and pensioners. It's very much a negative feeling when you talk about accessibility with people. It's expensive, its for the few, and what we see in the larger picture is that it's not for the few. A lot of the things we do benefit a lot of people in the long run. A lot of my work also includes both internally and externally to tell them about this and show examples of the benefits. I also have a responsibility for the audibility. So I'm working on getting someone working with sound to take over this responsibility.

CF: Describe what your department / team etc. does and where in your company you are situated

SA: There are two of our divisions that work closely with accessibility: Strategic and Media division. I'm located in the strategic unit. We're 6 persons in that unit. Then we have a unit called PKT: programme mottag, klargöring, tillgänglighet. That's the unit that produces subtitles, translations, sign language interpreting, AD and spoken subs. We're both organised in the Strategic and Media Division. Then we have the tech division, called production, product and teh division. We have several people there working with accessibility. We have a digital accessibility expert. He's very good at universal design when it comes to apps web pages and so on and the player. Then we have the owner of work processes for subtitling and accessibility services. Those people are very important to us

CF: Where would you place yourself in your company's hierarchy (middle management etc.)?

SA: I have one person between me and the director. For this strategic unit there is a leader for this unit and he is my boss and his boss is the director. It means nothing to me "what to put on the card" (titels) but comes to making things happen, that's the most important thing. If I'm in the lower management or the top I don't care. Sometimes you might feel you're a little bit too low to get people to take you seriously.

CF: Describe your relationship to the directors of your company?

SA: Good communication, definitely. I don't communicate with them very often. Just now the Norwegian government decided to implement the EAA into the law. These kind of things I inform the directors. NRK doesn't have to relate to many laws but actually during the recent years But from my area there have been several laws that NRK has to conform to and then I'm in dialogue with the directors.

CF: How would you describe your relationship to the rest of the company, which departments do you work with the most?

SA: NRK's main strategy is to "gather and engage all people that live in Norway". I've told them about how many hard of hearing etc. there are in Norway. When I started working the first thing I did was tell them about these numbers. NRK has been wanting to do these kinds of things for many years, even before there were laws requiring it. We have been doing a lot of these things anyway because there is a genuine wish from the top to reach everyone. So I think we're on the same page, but when things cost money there's always a question of prioritising and that's where the laws come in. You have to use your heart and your head, and my heart is sometimes a little bit stronger than my head. When inside the NRK I'm the voice of the audience, but when outside, I'm the voice of NRK and it's top management.

CF: Does NRK have a specific access service strategy and if so, can you explain it to me?

SA: No we have been using the long time firm strategy, because it's the best way to implement your thoughts because everyone knows them. We want to gather all people. I think it's very very important to not have a separate strategy that's "special, for these special people". So we don't have a separate accessibility strategy. However, NRK will have discussions during the fall whether or not they want to develop a separate accessibility strategy. But I'm not sure if we will do that.

CF: How involved are you in the strategic work?

SA: We re-organized last september so now I'm part of the strategic division. And my boss has been working closely with the top directors when it comes to developing a long term strategy. And we have 3 strategies: long time, audience strategy and organisation strategy. Long term is the main strategy. Audience strategy looks at how to meet the audience and the company strategy is for what kind of people we need to have working within NRK. I have been working towards the audience strategy. Since my boss is so included in strategies all around NRK (news, sports, Tech,) he is a doorway for me and knows when to put me into the strategy work. So far I can say it's definitely been a good thing for me. Not sure if it's good enough, but definitely much better than one year ago. But every organisation is different and it very often depends on the people.

It's such a new area with universal design, especially when it comes to the technology division. They are honest and say this is so new that they didn't learn about this during their education. We are so lucky to have Kristoffer Lium. He's probably the one of the best in the world and he's really gold for us. We've been working together for 3 years

now, spreading consciousness in the technology department. But there's still holes and these holes can ruin the work that others have done. Some leaders in certain positions don't see how important this is and what I've been working on for the past 6 months is explaining to them that we have a law that says we have to do this. This is not something nice to have, fun to have etc. We have to have it. There will be an audit and we will be rated and it's not good for us if we deliver poorly. On the other hand if we're the best in Norway, people will say: that's why we pay for the NRK. So we're really working hard on all levels to reach everyone that works in technology because it's not enough that 20-30 are conscious, we need 100%. At the same time we have to be conscious about this being something new and not being critical. But now we're at the tipping point of saying please can you do this to.. We're switching from working with the heart, to the head because all the people we can reach with the heart, we have already reached. The last ones we need to turn around, we need their heads. And the head is the law, so I'm saying ok now the gloves are off.. That's maybe sharing too much..

Some of the things we want and need in regards to accessibility do have quite large consequences. Adding a new service to the player has other implications etc... So it's complicated. So when I want several subtitle tracks in the player. Sounds easy, but to make this work on 25 different platforms is a big work etc.. So I understand that it takes time. But then there's the new EAA law that says that the smart tv etc have to be standardised after 2025. This might simplify things for us.

When it comes to journalist etc. There are more than 3000 people at NRK. Most of them are making content. To make all of them aware of subtitles etc. is probably now... Most of them probably know. But most also understand that you get more views and clicks if you subtitle.

All programmes that go live on tv are subtitled through Reiduns.. They pick up in the system all the programmes that are planned and subtitle them. But when e.g. News make a 3min video for social media, they dont like the tv-subs. They dont want it to look like a tv-programme and the font is too small. Then the journalist makes the subs.

CF: Process behind making the strategy, who makes the decisions? How do you go about implementing the access services strategy? How would you describe the decision making process in regards to access services at NRK?

SA: If we get new laws, we... In significant decisions we go to the "top leader group": This is what they demand, this is what we're lacking" costs, time, technology etc. They have to be informed. It's not automatic that we get the funding. The division has to find the money to do it. Make prioritisations. When it comes to content we have to discuss internally in the Media Division where to get the money from. Should we do it in bokmål, nynorsk, samisk, or sign language...? Let's do it in sign language! I would like us to take that kind of view on it and not this "special...".

I think involving the users and the target groups in the planning is very very important. (NRK has a new deaf sign language interpreter starting to work soon). Also for the services. We try to remember to work with the end users as well when it comes to the strategic process as well.

CF: How centralised or decentralised would you say the decision making in regards to access services are? Do you think there are decisions made elsewhere that you aren't involved in?

SA: No... Of course there are decisions made that exclude accessibility, and I'm not aware of it. That's why I perhaps want to be a part of the technology department, at one of their meetings. Not because they don't want to think about accessibility, but no one has the responsibility of accessibility at a higher level. We re-organised 11 months ago so we're still trying to get everything to work. Finding the holes. There are definitely decisions made where I should have been. Our ambition is to make accessibility a part of NRK's DNA. This takes time and reminding. I'll give our organisation a little more time before I call it a problem. A lot of the stuff we would like to and the law requires from us has large implications if we don't find some suitable areas to work on.

CF: What do you find to be the greatest challenges in regards to managing access services at NRK?

SA: For me there's the services and then you have audibility, readability, cognitive reception etc. It's a very large question. Usability of web pages etc. That blind people can use our players etc. All these things are also accessibility, but also usability. I'm lucky that my boss understands that these aren't services just for the blind and deaf people, it's something that every user can gain from. So we're calling our user councils the "canary birds" (mines etc.). If our user panel can use the service, then everyone can use it. Think of it that way instead of making our services and content usable for small groups. That's why I say I don't really want an accessibility strategy.

I don't see ML AI etc. as challenges, but opportunities. Some of the stuff does have large consequences for workflows.

We've been pulling up technology for free speech. A couple of weeks ago one of our tech experts posted on our internal web that look at this stuff: he had his son's fire engine car in the background and turned on this new software that just completely "turned the sound off". New technology that if we could implement this into our player, people could click the audio button and choose "pure speech", but then you would lose all the background content like birds singing etc. That's really interesting and fun. But it's not easy to implement.

CF: What do you think are the major challenges NRK might face in the future?

SA: Many of the things that we do are done by people close to the end result. It looks like we will have a law that requires audio description for everything that is on demand. So if we have a unit making programmes for young people and if they make a short video and post it on their web page, then the law will probably require that we have audio description on that video. So either we will have to have a workflow that always puts the content through PKT (so they will subtitle, sign language, audio describe etc) and then get it back, or they do it themselves. But they want to post things fast... That means that we have to teach 3000 people not just the software, but what subtitling is.

So the challenge will be getting it into the DNA of the people from the top to the floor. When the programme leaders are in the studio to be more conscious about.. "Think that

you're making the programme for radio as well". Then we don't have to put money on making audio descriptions as well. So the challenge is making a cultural change happen, and that takes time. This is what I would like to work on more, than an accessibility strategy.

Appendix D – Interview with HS June 3rd 2020

CF: How would you describe your role and responsibilities at DR?

HS: I'm a part of our Media Strategic area. That's different to lots of countries, because in many other countries you rule this thing from the production. We don't do that. My role is write the strategy that we can run from to fulfill what we are ordered to do in the public service contract... The background is the legislation we have in DR. We have a public service contract.

Then I have to coordinate with the rest of DR. I'm also responsible for the communication in this area. To make sure that we have the contact to the disabled organisations, that we have some press when we release bigger things. We also run a facebook group etc.

I'm also responsible for diversity. And when talking to the board, diversity is nowadays much bigger than accessibility. Today accessibility is common sense. There's more talk to do with diversity. With accessibility we now know what to do and we know how to do it. We see new platforms and new ways to go, but it's not that difficult anymore. It was more difficult 10 years ago.

The first year I worked in this area I had to convince everybody that this is something we should do, not just because we were told to do it, but because it is logical. It's about inclusion and making sure that everyone can use our product. And that's mainly accepted today.

Having this role was my own idea. Instead of being alone with accessibility I said I want to keep accessibility and have an extra person with me. I thought that these two things were more connected than they really are. They are two very different areas. When I work with diversity it's more political, more strategic, workshopping, developing. Accessibility is business as usual. But it makes sense to have both in my own day, because it is very concrete to work with accessibility whereas diversity can be very abstract. So that's why it is a good combination. And of course you can combine them and they are connected. You can say that diversity is making sure that everyone can see themselves in what we are doing, I can be wiser on who I am and who others are. It's a very democratic thing. Accessibility is making sure that everyone is capable to view and listen to what we are doing - it's also democracy if you put it up to that level.

CF: How many subordinates (if any) do you have?

HS: None.

CF: Describe what your department / team etc. does and where in your company you are situated

HS: We have internal and external services. The internal services are organised in Media Production area. The subtitles for example have their own leaders. My role is to

tell them what we have to do. Not how, but what to do. How many programmes do they have to make sure that they subtitle. We have an external company that delivers sign language and it's the same thing that I have to describe what we should do.

I report to the vice director of the Media Strategy.

CF: Where would you place yourself in your company's hierarchy (middle management etc.)?

HS: In the middle management.

CF: Describe your relationship to the directors of your company?

HS: I come once a year to tell the directors that this is how we work right now and this is the plan for coming year. That's it. I have been the editor of accessibility since 2011 and in the first years I had to do much more talking. It's not necessary today. Now we have only few problems with this area.

CF: How would you describe your relationship to the rest of the company, which departments do you work with the most?

HS: Accessibility: technicians, subtitlers, practical people. Also IT developers. Very little with the journalists and programme makers. Diversity: just the opposite. 5-7 years ago DR also had to educate journalists in accessibility, but it's not necessary any more. Important that they make sure that sound and picture are important and that they communicate in a clear way. They also have to know that they must deliver the programme so that we can get it subtitled and share what they are doing with the live subtitlers and live audio describers. But it's not a problem any more. It was a few years ago. Today, everyone knows me. They e.g. know to come to me and ask if it's possible to air this programme that we cannot get subtitled for some reason. They have to get permission from me to do that, and everyone knows it. They didn't know that 6 years ago and it took a lot of work. But it's not a big deal anymore. It's easy because I've been in this position for so very very long.

CF: Does DR have a specific access service strategy and if so, can you explain it to me?

HS: Yes we do. When we get the public service contract we make the strategy. It's more a plan of how to fulfill the contract. We are told what to do in many details. The process is to analyze how we can fulfill what they ask us to do and then I write the plan, what the difficulties are, what it will cost, what we will do and how. That's the plan. Some years ago I wrote some strategic guidelines we are running after, but now they are part of the contract. So now we are writing the contract to each other. There are two parts in the contract. 2 years ago we decided to go into the contract with our strategic guidelines. The guidelines are that (1) we should do what can help "most people". We also have to do things for small groups too. Another guideline (2) is digital first. So when we innovate something for accessibility we go for the digital platforms more than we do for flow tv. But there's always a BUT: we cannot forget flow tv, because we have so many seniors. (3) Quality first. Quality is always more important than quantity. E.g. it's not

good enough to deliver subtitles if they're not useful to anyone. The last one I can't remember... I thought it would be good for the people in the field to have these guidelines when making decisions.

In the end it's decided in our board. Then I have to send out to everyone relevant in DR that this is how we run no. We have the contract for 5 years so halfway through I go back and look at it and evaluate where we are now, because 5 years is too long a distance to run. Everything changes so much in 5 years.

CF: How would you describe the decision making process in regards to access services at DR?

HS: I call the shots in co-operation with the technicians. So I don't do it alone - I write it alone - but of course I listen to experts.

Sometimes, not so often but sometimes we disagree. E.g. I want to have subtitles on everything, but to make it easier for the editorial teams we have decided that subtitles on e.g. fb-clips, the journalists are allowed to write the subtitles themselves. They have some learning on how to do this, but our subtitlers find it so so so wrong to decide that. But it is accepted that this is how we run. No revolutions...

CF: What factors affect the decisions that are made? Legislations, values etc..

HS: Yes, the values and organisation strategies have influenced. Also what influences is that we have developed new apps and what is possible - what can be done and what cannot. Words are cheap, but it's not always cheap to make them reality. So it is important to know where we are in the development of apps etc..

CF: How centralised or decentralised would you say the decision making in regards to access services are?

HS: The services are kind of decentralised. They have been more decentralised before. I see me and my team as an umbrella. We have to look into all the services and every part of them to be able to choose what's important. Should we spend the money on subtitlers, or should we spend them on the sign language etc. So we are the strategic umbrella. We also buy subtitles from 2 external companies. We also buy sign language. A few years ago we bought the audio description to be inhouse. But everything in the digital area is another part of the organisation. It's only the strategy and communication and responsibility of fulfilling the contract that is centralised. And it has been centralised since 2011 when I was asked to take this job. That part (strategic responsibility) was also decentralised until then. And of course I think it's a good idea. NRK copied our model. Siri's job is almost the same as mine and she's placed in the same place in the organisation. Sweden is completely different, because Anna is part of the subtitling department until she was also head of accessibility. And I think you can see it in how our strategic thinking and which solutions we find to be correct. Last year Anna told about the new way to make subtitles, where they had decided to make subtitles that are best for the ones who cannot hear. And that's not my strategic

thinking. The way we think is we try to choose ways to go that are good solutions for everyone. So I think of people on the Metro who want to watch a video etc. and people who have babies sleeping, and deaf and hard of hearing and so on. But it's very different ways of thinking and different strategies and it's funny to see that because I think some of the answers to why we have such different strategies are do to where we are placed in the organisation.

CF: What do you find to be the greatest challenges in regards to managing access services at DR? Are there any significant structural changes you would like to make?

CF: Until I got Marie I really had problems covering everything. But Marie is now responsible for the contact to our developers on apps and websites. Se's also responsible for which programs we audio describe. Then I can concentrate on being the umbrella. Its fantastic that we could be divided and I could focus on being the editor and not being so practical. I got that when I got the diversity responsibility. It's very nice to not have to look into every area.

My background is that I don't know anything of these jobs at all. I'm a journalist. Anna knows everything about subtitling and Siri knows everything about sign language. I guess when you use it in the correct way there could be benefits from this.

CF: What do you think are the major challenges DR might face in the future?

HS: The main challenges is how to get our users into the digital room instead of flow tv. How do we teach the older people do use the digital room. We don't have the many we had a few years ago and our budget isn't getting bigger. It's getting smaller. We could give them so much more if we could move them from the tv to digital. It has very much to do with accessibility. Many have the "kit" at home but they don't dare to use it.

There are some big decisions to make this year. When we are implementing soon a new tv-app for example and do we want to personalise it. So you could set up your DR tv to always find e.g. the spoken subtitles, or is that making everything harder for those to need the services. I think it's a very hard way to go, because if you figure out how to personalise an app, you will have a much easier life. But if you never get to that step it will be very very difficult. We have many of these decisions to make. Internally we fight with that very few developers even have a flow tv at home. So we talk about target groups whose needs many of us don't know because we live on another planet. There's no correct answer to this question. The organisation, how we make the strategies is significant. For me the discussion with Anna made it clear to me that we will go different ways depending on how we are organised.