

## Regulating the quantity and scheduling of television advertising on public service channels

### About us

RNIB is the largest organisation of blind and partially sighted people in the UK and welcomes this opportunity to respond to the consultation. With blind and partially sighted people at the heart of everything we do, our community of over 33,000 people brings together anyone affected by sight loss. More than three quarters of our Board of Trustees are blind or partially sighted. We support, empower and involve thousands of people affected by sight loss to improve lives and challenge inequalities. We engage with a wide range of politicians, organisations and professionals to achieve full inclusion through improvements to services, incomes, rights and opportunities.

We campaign for the rights of blind and partially sighted people in each of the UK's countries. Our priorities are to:

1. Be there for people losing their sight.
2. Support independent living for blind and partially sighted people.
3. Create a society that is inclusive of blind and partially sighted people's interests and needs.
4. Stop people losing their sight unnecessarily.

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### RNIB's Response

Adverts often carry the same cultural touchpoints as other programming. Catchphrases and memes from adverts pervade popular culture. References to delivering bread to the tune of Dvorak's New World Symphony or being good enough to play for "Accrington Stanley" will instantly bring particular brands to mind and have been echoed and lampooned many times over the years.

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Every year on the run up to Christmas viewers look forward to the Christmas adverts created by large brands and every year RNIB advocates with the largest brands to make their adverts accessible. Some corporations have audio described their Christmas adverts, notably John Lewis and Tesco. This has transformed the experience of our members who watch TV and as a result were able to join in the discussions with sighted peers. To misquote another famous advert however, “Accessibility is for life, not just for Christmas.”

When adverts are inaccessible, viewers not only miss out on the message of the advert and any social links that it could have provided but are also left in limbo until the scheduled programming restarts. This is linked to the length of the advert break and longer breaks will negatively affect blind and partially sighted people unless the adverts are accessible.

Audio description is one way to make audio-visual content accessible but it is a remedial action used to retroactively fix an inaccessible script. An accessibly written script which audibly communicates any important information doesn't need audio description or the ability for the broadcast stream to carry two audio tracks. If the script is not accessible already then audio description can fix this.

PSB channels currently have a lower ratio of adverts and a higher percentage of content with audio description which is something that is welcomed by audio description users. Any move to increase the ratio of adverts to content needs to take blind and partially sighted people into account. Broadcasters need to encourage brands to make their adverts accessible either through universal design (writing scripts to be accessible by default) or with audio description. Advert breaks in primetime timeslots, in must-watch content or shows with audio description should prioritise accessible adverts. Ideally accessibility should be a prerequisite for adverts in must-watch content.

Adverts are a much larger part of popular culture than they usually get credit for and it's time that blind and partially sighted people were able to participate fully. After all, “Every little helps”.

John Paton

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Technology Officer  
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