

Ofcom consultation on Channel 4 licence renewal

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.

RNIB welcomes the opportunity to respond to this consultation.

Consultation Response

Question 1: Do you agree with our assessment of the potential impact on specific groups of persons?

The consultation document states that:

“Our proposals may have an adverse impact on audiences who prefer to use, or who are more reliant on, traditional broadcast services; this may include older people and people from lower socio-economic groups who may not have access to the internet.”

This is also true for people who are forced to access Channel 4 services through traditional broadcast services because of a lack of accessibility

in its digital offerings. As noted in the consultation document [i] Ofcom must have to the need to “...advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it...” This means that any adverse impact on blind and partially sighted people must be minimised especially if there is a known solution such as requiring accessibility.

RNIB welcome a digital first strategy as long as it is accessible. Computers, smartphones and even smart TVs are able to read out text. Even if an app developer has trouble using the built-in speech or the device doesn't support it companies such as Sky and Freeview have demonstrated the use of cloud-based TTS (text to speech) to deliver speech. Speech can be generated in real-time by software in the receiving device, in real-time by cloud-based TTS services or, considering the relatively static nature of the text to be read out, can be generated ahead of time when content schedules are created. There is no excuse for a lack of TTS in apps in the modern technology landscape.

Channel 4's VOD services will be included in the media bill and so will soon be subject to access service quotas. These quotas are, however, far lower than the current level of access services delivered by Channel 4 on traditional broadcast television. Ofcom's duty to “...advance equality of opportunity...” between people with sight loss and their sighted peers means flexibility in moving towards a digital first strategy must not include the flexibility to deny access to blind and partially sighted people through a lack of accessibility. Provision of access services on Channel 4's digital platforms must match those currently available on traditional broadcasts and those digital platforms must be accessible to blind and partially sighted audiences using common tools such as magnification and screenreaders. Until that is the case Ofcom must discourage any movement away from traditional broadcasting in order to retain equality of opportunity for blind and partially sighted people against their sighted peers.

If Channel 4 is to be “digital first” its digital offering must first be accessible.



Question 3: Do you agree with our proposed approach to setting the new Channel 4 licence?

The consultation document states:

“...our approach to setting a new licence for the Channel 4 service aims to strike a balance between allowing C4C greater flexibility in the future to develop its content and distribution strategy in support of its digital transformation, while continuing to safeguard its investment in distinctive UK content and protect the delivery of the core elements of its linear output.”

We would prefer this wording to say “...the delivery of the core elements of its linear output to all UK audiences”. Despite Channel 4 claiming to be concentrating on digital outputs there is a lack of access services on Channel 4’s digital offerings. This means Channel 4’s digital services are not yet ready to fulfil their PSB obligations.

Question 4: Do you agree with our proposal to retain the condition requiring not less than 208 hours of news programmes in peak viewing time to be included in the Channel 4 service in each calendar year of the licensing period?

We agree that news is an important element of public service broadcasting and that all UK audiences should be able to benefit from trusted news from PSB channels. Channel 4’s broadcast and digital news offerings must be accessible and this should be explicitly required in the Channel 4 license.



i Section 2.16 references section 149 of the Equality Act

