

RNIB response to Ofcom's proposed plan of work 2023/24

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 Responses

In the past year RNIB has been disappointed in the lack of progress towards securing access service quotas for on-demand program services. We understand that Ofcom is waiting for DCMS to make this possible so it is encouraging to see that Ofcom has room in its yearly plan to pick this up when government allows.

The consultation document refers to the investment in online virtual worlds:

“New consumer experiences are being developed alongside traditional communications, with significant investment in online, virtual worlds such as the metaverse and augmented reality.”

However these are not mentioned in regards to the plan to develop Ofcom's understanding of emerging and disruptive technologies which instead seems to focus on wireless networking technologies.

Virtual Reality experiences have already been used to broadcast content. Travis Scott and Arianna Grande have performed virtual concerts in Fortnite, Soccer Mommy and David Guetta have performed concerts in Roblox, Foo Fighters and Young Thug have performed in VR on Horizon Venues and Justin Bieber has performed on Wave. This makes any of these platforms comparable to on-demand program services and, as a new form of content streaming, Ofcom needs to understand potential accessibility barriers they may raise and have a plan to mitigate these barriers. Content streaming through VR applications could bypass any scrutiny Ofcom is placing on on-demand program services in terms of access services. With the apparent lead time for introducing legislation being so lengthy Ofcom need to start assessing the accessibility now and considering measures that require content and platform owners to make their services accessible.

In RNIB's response to Ofcom's Plan of Work 2021/2022 we highlighted the size of the UK gaming market and the lack of accessibility of videogames. We recommended that Ofcom perform research into videogames in order to extend the UK's reputation for accessibility into this market. We are not aware of any research Ofcom has done on this but we worked with i2 media research, Goldsmiths, University of London and Moray House School of Education, University of Edinburgh to conduct our own research. The RNIB Accessible Gaming Report 2022[i] found that blind and partially sighted people found videogames to be inaccessible but were still motivated to try to play them. Games developers demonstrated a clear interest in making games accessible but reported a lack of knowledge around how to do this. When asked about economic factors that would encourage them to make games accessible 16 out of the 46 developers who answered said "Government Policy / Legislation". There will always be leaders in accessibility and those who will not act voluntarily. In the broadcasting industry legislation has helped to level the burden of accessibility to ensure that companies less willing to consider access services cannot avoid doing so. It may be that legislation is not possible or impractical in the gaming market but

Ofcom has demonstrated a proficiency at wielding subtler tools. The broadcast industry has benefited from forums and roundtables that Ofcom have chaired and best practice advice they have published. We feel it would be timely for Ofcom to perform its own research into the accessibility of the gaming industry and what encouragements could bring about better accessibility in gaming.

The work on affordability of communication services needs to take into account people with disabilities such as sight loss. Blind and partially sighted people are less likely to be in paid employment [ii], more likely to have to rely on taxis if they want to get around (than cheaper options such as public transport) and often have expenses linked to their sight loss such as the high cost of assistive technology. This means they are more likely to be living in poverty and RNIB understands that people with other disabilities are in a similar situation. Blind and partially sighted people have benefitted from the rise in remote working and videoconferencing that the pandemic brought about but this makes affordable broadband and communications packages even more important. As mentioned, blind and partially sighted people are less likely to be in paid employment and also find it harder to get out of the house so affordable and reliable communication services are also essential for social connection and, as a result, mental health.

RNIB look forward to another year working with Ofcom to improve the communications market for blind and partially sighted people.

John Paton
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i <https://rnib-mediaandculture.github.io/AccessibleGamingReport/>

ii In 2019 only 1 in 4 registered blind and partially sighted people of working age were in employment according to research carried out by RNIB