

RNIB response to Consultation on the BBC's request to change its Operating Licence

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. Blind and partially sighted people have expressed a great deal of interest in IoT technology and its potential benefits for them.

Consultation Response

RNIB welcomes the opportunity to respond to this consultation. The BBC and Ofcom have a duty to regard the needs of blind and partially sighted audiences[i] including children so it is important that these changes do not disadvantage children with sight loss.

A well-structured website can normally be considered accessible if it works with screenreaders on major web browsers including Voiceover and TalkBack on iOS and Android respectively. A screenreader presents

the two-dimensional layout of text and images as a navigable stream of speech which can make a webpage accessible as long as non-textual elements are given meaningful labels in-line with standards and guidelines. Accessing a website through a screenreader however is a more complex interaction than doing so via visual means. In moving content online the BBC may be disadvantaging children with sight loss by requiring them to access it through a screenreader. This should be taken into account and mechanisms should be explored to simplify interaction with content such as autoplaying of series or designing layouts to be easy to navigate via a screenreader. Alternatively, the BBC has an opportunity to incentivise screenreader use by providing engaging content which can be accessed once screenreader skills are acquired. Through the use of linked tutorials and gamification the BBC may even be able to help children acquire these skills faster.

As part of the monitoring requirements placed on the BBC by Ofcom attention should be paid to the mechanisms the BBC has used to simplify access of iPlayer via screenreader and whether the move has positively or negatively affected blind and partially sighted children.

Question 1: Do you agree with Ofcom's provisional assessment and its proposed changes to the Operating Licence for Children's news on CBBC? If not, please explain why, providing appropriate supporting evidence where possible.

RNIB has some concerns. Content shown online is often less accessible than that on terrestrial TV and although news is exempt from audio description quotas as it often follows a dialogue-led format which can be understood without sight. Section 3.41 of the consultation document talks about providing daily news and information for children "...through content in a range of different formats...". If these formats diverge from the standard audio led format for news broadcasts then care needs to be taken to ensure that these new formats are just as accessible.

Question 2: Do you agree with Ofcom's provisional assessment and our proposed changes to the definition of a first-run UK origination in respect of children's content and additional condition to safeguard the provision of some first-run UK originated children's

content on the linear services? If not, please explain why, providing appropriate supporting evidence where possible.

The BBC has made a voluntary commitment to audio describe 20% of its content and in 2018 the Cbeebies and CBBC channels had 30.6% and 36.1% audio description respectively. If this content is broadcast initially or exclusively online then it needs to have the same level of accessibility. This means the same proportion of content should be audio described and it should be audio described from the point that it is made available regardless of whether this is done online or by linear broadcast.

i <http://www.legislation.gov.uk/ukpga/2010/15/section/149> last checked 02/12/2019