

Review of Ofcom's Code on Television Access Services and Guidance on BBC Accessibility - RNIB's response

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 Responses

Question 1: Do you agree with our proposal to continue to apply guidance to BBC UK Public Television services, and not to introduce guidance for the BBC's radio programme services for the foreseeable future?

RNIB agree.

Question 2: Do you agree with our proposal to consider relevant guidance in relation to the BBC's UK ODPS separately?

RNIB agree that it makes sense to consider accessibility of the BBC's ODPS alongside ODPS from other broadcasters at a later date.

Question 3: Do you agree with our approach to maintain the existing targets and guidance for the BBC's UK Public Television Services?

Section 4.6 of the consultation document states "... the BBC is subject to a 10% target but has voluntarily committed to audio describe 20% of its programming, which it has done without regulatory intervention. Moreover, the BBC has consistently exceeded this target since 2014. ... On this evidence, Ofcom is confident that the BBC will continue to meet its voluntary commitment, including in relation to any future services. ...we will continue to monitor the BBC's provision and are able to reconsider the target levels in future if needed."

RNIB welcomes Ofcom's recognition of the 20% voluntary commitment and that the BBC consistently exceeds this. We agree that the BBC can be relied upon to continue to exceed their targets and lead other broadcasters in this area.

RNIB also welcomes Ofcom's willingness to consider raising targets if deemed necessary at a later date but feel that any such review should cover all broadcasters taking into consideration the current maturity of audio description in the UK.

Question 4: Do you agree with the proposed modifications of the TV Access Code set out in Annex 3 to ensure it applies to BBC UK Public Television Services under the 2016 Agreement?

RNIB agree.

Question 5: Do you have any other comments regarding our proposals in relation to how the BBC should make its UK Public Services accessible under the 2016 Agreement?

RNIB have no other comments.

Question 6: Do you have any comments on our proposed changes to Ofcom's Code on Television Access Services?

RNIB have no other comments.

Question 7: Do you have any comments on our proposed amendments to the guidance in relation to the dates by which broadcasters should apply to Ofcom for alternative signing arrangements, and request exemptions on technical grounds?

RNIB have no other comments.