

See differently

Small Screen: Big Debate The Future of Public Service Media

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

The consultation document is focused on the content created by the current PSB (Public Sector Broadcaster) model. Public sector broadcasting offers more than just a range of content however. It also funds research into new production methods, better accessibility and audience behavioural insights. Notable examples are the Audio Definition Model (ADM) and EAR production suite[i], Project Orpheus[ii], early pioneering work on subtitles and audio description, and innovative sound-mixes on Dr Who and Casualty demonstrating binaural audio[iii] and the use of audio objects to create a more accessible audio mix[iv].

ITV has worked with RNIB to trial different scripting styles for audio description on reality TV and Channel 4 have explored spoken subtitles on foreign language content. PSBs have a greater interest in advancing accessibility and there is a higher expectation of accessibility with PSB content. These are things that shape and define UK broadcasting and must not be lost.

The consultation document states that PSB content must be available to audiences but for blind and partially sighted people this means it must be accessible. If you rely on a screenreader to navigate an interface but the service does not support this then the content on that service is not available to you.

The UK has a quota for 10% of broadcast content in the UK to be audio described but the BBC, ITV, Channel 4 and Sky have signed up to a voluntary commitment to audio describe 20% of their content and sometimes describe up to double this amount. Blind and partially sighted viewers have a higher expectation of broadcast content from PSBs having audio description. The shift to a public sector media model described in the consultation document would move more of that content online. There is currently no quota for online content and no guarantee that the work currently ongoing with Ofcom and DCMS will set an equivalent quota. The process of releasing whole series of a show as a boxset without fully audio describing it is already weakening that accessibility. Audio description is being added to content as the content is broadcast meaning that sighted users can watch ahead but audio description users have to wait for the show to be aired. Moving more content online could create a reduction in the accessibility of PSM content unless the new rules adopt the 20% quota that is currently in effect.

Public sector broadcasting drives the accessibility of UK broadcasting in terms of both provision and technology. When considering a shift from a PSB model to a PSM (Public Sector Media) model care needs to be taken to ensure that this is preserved.

1: Do you agree that a new regulatory framework for PSM delivery should support a more flexible ‘service neutral’ delivery approach that is more outcomes focused?

RNIB is agnostic as to the framework used but content created under a PSB or PSM model must be available with any access services created for it on an accessible player. If the service that is commissioning or buying the content (the receiver) is not accessible or does not support AD then the content should also be made available on a PSB VOD service that supports accessible navigation and AD. It needs to be clear to a user where that content is available in an accessible form which could mean a notice telling users which PSB VOD player they can access it on or a clearly recognisable and audible brand ident at the start of the content.

2: Do you agree with our proposals for a clear accountability framework?

RNIB do agree there is a need for a clear accountability framework. We also agree that Ofcom would be best placed to monitor this. Ofcom is bound by the Public Sector Equality Duty to “advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it”[v]. This means they will need to take into account the availability of accessibility on PSM content.

3: What do you think should be included in the PSM ‘offer’?

Public Sector media needs to meet minimum accessibility requirements. If the PSM offer is in the form of a body of content then there must be an audio description quota on this body and that should be in line with the 20% voluntary commitment rather than the 10% legal one.

If the offer is in the form of a player then it needs to be accessible, it should make use of accessibility features built into the platform such as TTS, and magnification where possible and should have a high contrast interface.

5: What are the options for future funding of PSM and are there lessons we can learn from other countries' approaches?

As an advocacy body RNIB has no opinion on which funding model is used except to note that it must lead to content being accessible and must support the research and development of accessibility services.

The commercial director of a multinational media company is quoted in the consultation document as saying “The licence fee funding enables the BBC to make decisions that are tougher to make if you’re a purely commercial organisation...” RNIB believes that this includes research into accessibility.

Whichever PSB funding mechanism is decided on must support research into new technologies and production techniques for improving accessibility. The fruits of such research must then be made available to the broadcasting sector in the same way that the BBC R&D webpages share the fruits of BBC’s research.

6: What do you think about the opportunities for collaboration we have referred to? Are there other opportunities or barriers we haven’t identified?

A media expert is quoted in the consultation document as suggesting a single BVoD (Broadcaster Video on Demand) service would make sense but warned that “This might undermine the PSBs’ different remits and purposes and also presents challenges if the PSBs do not complement each other.”

RNIB notes that the Disney+ video on demand service includes content organised within six fairly diverse sub-brands (Disney, Pixar, Marvel, Star Wars, National Geographic and Star). Content can either be searched by sub-brand or by genres such as comedy and action. By enabling searching by sub brand a UK PSB BVOD app could support PSB differentiation whilst offering a significant competitor to other video on demand apps.

This would be especially true if both free on demand and paid-for archive content were available on the same service. This would be similar to the Amazon Prime Video service which includes content included in the

Amazon Prime subscription alongside content available with add-on subscriptions to other services (such as Starzplay, hayu, Shudder, ITV+, Pokemon and MTV) and content which can be bought or rented for an additional one-off payment.

As noted above PSM content must be available in an accessible service so any multi-PSB VOD service would have to be as accessible as is possible on the platforms it is available on. If such a service was not accessible then this may invite legal action from advocacy bodies.

7: What are your views on the opportunities for new providers of PSM?

With the transition from PSB to PSM RNIB see opportunities for new entrants to be wholly focused on content that meets the PSM remit or for existing companies to create sub-categories that meet it. Netflix and Amazon both use “Originals” to signal that a piece of content was created by them. An equivalent tag could be used to signal that a piece of content fulfils a list of requirements for PSM content and Ofcom could consider how to incentivise and reward such content creation. Whether created by a new entrant or an existing media company however such content would need to meet accessibility requirements such as being available on an accessible platform and meeting a higher requirement for audio description.

Any PSM model must also retain the ability to fund R&D focused on accessibility and the fruits of such research must be made freely available to the UK broadcasting industry.

i <https://www.bbc.co.uk/rd/blog/2020-10-ear-next-generation-audio-software-tools> last checked 15/03/2021

ii <https://www.bbc.co.uk/rd/projects/orpheus> last checked 15/03/2021

iii <https://www.bbc.co.uk/rd/blog/2017-05-doctor-who-in-binaural-sound> last checked 15/03/2021

iv <https://www.bbc.co.uk/rd/blog/2019-08-casualty-tv-drama-audio-mix-speech-hearing> last checked 15/03/2021

v <https://www.legislation.gov.uk/ukpga/2010/15/section/149> last checked
15/03/2021