

Prominence and Accessibility on Connected TV Platforms

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.

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Consultation Responses

In September 2025 RNIB brought together stakeholders from across media and broadcasting for the Media Accessibility Symposium [i]. The symposium highlighted that the presence of audio description was only one part of the accessibility puzzle and users were also held back from full access by issues such as poor accessibility labelling and bad or inconsistent user interfaces.

Users at the Symposium identified that some series labelled as having audio description didn't have it on all episodes. The suggestion from the event was to have different labels for series that were fully described (all episodes), partially described (some episodes) or were accessible without the need for AD. AD users didn't want to get part the way through

a series and find that the rest of the episodes weren't described or find that a long running programme with multiple series only had AD on some of those series.

It was also highlighted that when services didn't have AD categories it could be hard to find content that had description. The suggestion was to require all services to have an AD category or to allow users to filter for AD. This could also include categories or filters for content that is accessible without description. Some of the biggest service providers have added a lot of audio description but until the majority of content is accessible without sight it can be disheartening to look for content you would want to watch only to find out after you've selected it that you can't access it because it hasn't been made accessible.

Users with accessibility needs have those same needs regardless of the service or device they are using but often need to reselect accessibility features for each new service or device. The accessibility features don't always persist within a service or device so may need to be reselected each time. The settings to activate the appropriate features can be in different menus or activated in different ways across devices and services so users identified that accessibility profiles would help them. Any accessibility profiles need to consider data privacy and data sovereignty as information about the access services people use would constitute personal data and could be sensitive. One user at the MAS spoke about how sight loss is stigmatised in their culture so they needed to hide it even from their wider family. This highlights the need for profiles to be private and within full control of users.

Accessibility often fails "at the point of use" because interfaces and controls are fragmented and inconsistent. If users have to learn a new method for turning on access features for each device or service then this will become needlessly confusing. RTSS and DIPS providers should be encouraged to standardise on common access pathways (the steps a user takes to do something) to ensure users do not have to keep relearning how to access accessibility features. This wouldn't require identical sets of interactions across all interfaces as long as there is at least one access pathway that is common to all interfaces for any accessibility focused user interaction.

Q7: Do you agree with our proposal on alternatives to visual information, and our assessment of its associated impacts? Please provide your reasoning, and if possible, any supporting evidence.

We agree that “Where visual information is needed to make use of the RTSS... users should be able to access this information in a non-visual format.”

The advice makes it clear this includes, but is not limited to, navigating the user interface and perceiving information about assistance for disabled people. Whilst this naturally covers finding and playing content it neglects the setup of the device. The highest priority of making devices accessible is everyday use but if text-to-speech is available on menus then it should be enabled by default in the setup process and should require users who don't need it to turn it off. This would barely inconvenience users who don't need it but would enable people with sight loss or print disability to set up their device independently. It would also advertise the feature to users who would not consider themselves the target audience but may benefit from it.

This was highlighted in RNIB's Media Accessibility Symposium by users and industry participants alongside a requirement for accessible controls to remain available long enough for screen readers to read them. It was also pointed out that accessibility often fails at the point of use because interfaces and controls are fragmented and inconsistent. As much as possible, devices should be built with a consistent design language and should be mindful of user interface patterns that exist in other devices to provide an intuitive interface for users.

All accessibility tasks and all core user journeys such as first-use setup, home/menu navigation, searching for content, navigating programme pages, and playback controls need to be considered and designed for. There should be consistent user interface patterns to make behaviour predictable and any timeouts need to be considered in terms of the speed of accessing information via speech which often takes longer than navigating interfaces visually. When designing for an audience it is important to test with that target audience so the expectation needs to be

that accessibility features will be tested by the disabled users who need them.

Q8: Do you agree with our proposal on text and image enlargement, and our assessment of its associated impacts? Please provide your reasoning, and if possible, any supporting evidence.

We agree.

Partially sighted users need to be able to enlarge text and other UI elements without any loss of function. This needs to work across all parts of the user interface including menus, programme pages, search results and any other visual elements required to operate the device. The amount of magnification required can change greatly from user to user so people living in shared households are likely to benefit from accessibility profiles that remember this and any other settings.

When testing these features it is important to test that magnification and text-to-speech can work on the device at the same time. These features can be used side by side so it is important that they don't clash with each other.

Q9: Do you agree with our proposal on distinguishable text and images, and our assessment of its associated impacts? Please provide your reasoning, and if possible, any supporting evidence.

RNIB agree.

Having text and UI elements that stand out against their background is essential for many partially sighted people. Ideally the default interface should have clear distinction between foreground and background elements but there must be at least one option that makes elements stand out in this way. This should work across all information presented to the user regardless of which other accessibility settings are turned on.

Q10: Do you agree with our proposal on information on accessibility features, and our assessment of its associated

impacts? Please provide your reasoning, and if possible, any supporting evidence.

RNIB agree.

Users need to know what accessibility features are available and how to turn them on. Without this, users may not even realise that the features are available. Having the accessibility menu at the top level of the settings menu is a good example of making information findable. Because users are looking in the same place on any interface this becomes intuitive but this idea could be extended further. By agreeing on common terminology and access pathways RTSS and DIPS providers could make the interface more intuitive. This wouldn't require identical sets of interactions across all interfaces as long as there is at least one access pathway that is common to all interfaces for any accessibility focused user interaction.

Another way of reducing user interface friction is with accessibility profiles. Once a user has identified themselves to an RTSS or IPS their accessibility preferences can be loaded and used. This removes the need to turn on access services such as audio description for each new service or device although, as noted, data privacy and data sovereignty need to be considered.

Q11: Do you agree with our proposal on labelling of accessible content, and our assessment of its associated impacts? Please provide your reasoning, and if possible, any supporting evidence.

RNIB agree but labelling is only useful if it is clear and trusted by users.

Users at the MAS identified that some series labelled as having audio description didn't have it on all episodes. The suggestion from the event was to have different labels for series that were fully described (all episodes), partially described (some episodes) or were accessible without the need for AD. AD users didn't want to get part the way through a series and find that the rest of the episodes weren't described or find that a programme with multiple series only had description for some of those series.

It was also highlighted that when services didn't have AD categories it could be hard to find content that had AD. The suggestion was to require all services to have an AD category or to allow users to filter for content with AD.

At the MAS, broadcasters acknowledged that communication is sometimes inconsistent and audiences often don't know when or where accessible content is available. One of the recommendations from the breakout sessions was to improve direct communication between broadcasters and end users using standardised access service pages and feedback mechanisms. For DIPS providers these pages could map out which access services are available on which content on which platforms and alert users to any work being done to provide better coverage and consistency across platforms. Work is currently being done by Sensor Media [ii] to create this resource which also includes open forums for end users to provide feedback for broadcasters and service providers.

Q12: Do you agree with our proposal on enabling use of the available accessibility features, and our assessment of its associated impacts? Please provide your reasoning, and if possible, any supporting evidence.

We agree that access services and other assistance available from a DIPS must be supported by any RTSS.

Ofcom should be encouraging greater coordination, however, especially between RTSS and DIPS. Where RTSS use TTS (text-to-speech) for accessibility of menus and services they should be required to work with DIPS to enable DIPS to make use of the speech engine to provide accessibility. Apps running on a device can find it hard to integrate speech engines within the constraints of running on RTSS hardware and using cloud-based TTS can create unacceptable amounts of lag. The best option is for apps running on an RTSS to be able to make use of the TTS on that platform but many report difficulties in working with the APIs for these when they are available. Other integrations such as passing

signals to apps when an AD button is pressed on a remote would also provide a better and more intuitive user interface.

Q13: Do you have any views or evidence on the effectiveness or impact of any other actions in relation to making use of the RTSS and finding/making use of accessible programming? Please provide your reasoning, and if possible, any supporting evidence.

Audio description that has been available on one service is often not available when the content is broadcast on other services. This may be due to the content being recut but is often because different services require different file formats. RTSS and DIPS providers need to work together to agree on common file formats and if no agreement is reached naturally than Ofcom needs to step in to identify a must-carry file format that access services must be made available in if requested. This would reduce the amount of work that goes into repurposing access services and may free up resources to provide audio description on more content.

Ofcom's Codes and Guidance should also collate best practice in accessibility features around navigation, playback controls, content labelling and accessible content discovery in order to help create default accessibility patterns and advise smaller providers.

One of the best ways to ensure interfaces work for users is to create direct and robust feedback mechanisms so they can highlight accessibility issues directly with platform and service providers. By requiring a simple, standardised, publicly visible mechanism for reporting accessibility issues Ofcom could encourage service providers to maintain accessibility.

Q16: Do you agree that 12 months is a reasonable period for all providers to bring themselves into compliance? Please provide your reasoning, and if possible, any supporting evidence.

12 months can work but only if it is paired with clear priorities and measurable milestones.

The Media Accessibility Symposium identified quite a few gaps in provision and issues that needed to be addressed so compliance will not be a quick fix. Providers of both RTSS and DIPS need to publish their plans early and prioritise providing information to users and creating robust feedback mechanisms so that users can help identify issues that still need addressing. In the mid-term, providers should be looking at ensuring all main parts of the interface are accessible through screenreaders, high contrast interfaces and magnification or zoom. Long-term work should include industry cooperation on access service file formats, common access pathways and investigating accessibility profiles. By providing a plan and feedback mechanisms providers can demonstrate commitment and ensure transparency.

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- i <https://www.rnib.org.uk/news/rnib-media-accessibility-symposium-2025-what-we-heard-and-what-happens-next/>
 - ii <https://insideaccess.live/>