

## **Assessing the impact of proposed changes to the BBC's public service activities: 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.

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### **Consultation Responses**

The Equality Impact Assessment in the consultation document outlines Ofcom's duties under the Equality act to "...have due regard to the need to advance equality of opportunity..." and then goes on to state:

"We have not identified any potential negative impacts on any groups sharing protected characteristics that are directly linked or relevant to our specific proposals. ...The nature of any real-world impacts on audiences therefore depends on the specific changes that the BBC may propose, and how our framework is applied to those changes..."

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This is not a judgement that there is no impact on equality but rather that any impact cannot be seen from this level of abstraction. As such the equality impact assessment needs to be made when the nature of any change is known. When assessing whether a Public Interest Test carried out by the BBC is adequate Ofcom needs to assess whether an Equality Impact Assessment has been done and whether it is sufficiently robust.

**Question 1: Do you agree with our proposals to add guidance on how we will consider the BBC's engagement with stakeholder as a factor in determining whether a competition is required?**

We agree that it is helpful for the guidance to explain how Ofcom will review the BBC's stakeholder engagement efforts when deciding whether a competition assessment is required. We would like to see BBC's engagement include consumer organisations and audiences who may be disproportionately affected by changes to services, particularly online. A light-touch reference to engagement (both in who is reached, and how consultation materials are provided) would strengthen confidence in the process without adding undue burden.

**Question 5: Do you agree with our proposal to set out, in light of our new option to not undertake a competition assessment, when we will invite third party comment on our determination?**

We agree with the proposal to invite third-party comment on Ofcom's determination in the circumstances set out in the guidance. Clear visibility of these opportunities will matter, especially where a determination is made without a separate competition assessment. We would welcome a simple expectation that these opportunities are communicated in a way that is easy for a wide range of stakeholders to find and respond to.