



The General Optical Council (GOC), the College of Optometrists, the Association of Optometrists (AOP), the Association of British Dispensing Opticians (ABDO) and the Federation of Ophthalmic and Dispensing Opticians (FODO) would like to submit a joint response to this consultation.

Together ABDO, AOP, the College and FODO represent over 12,000 optometrists, over 5,600 dispensing opticians and optical businesses in the UK who provide high quality and accessible eye care services to the whole population. The GOC is the regulator for the optical professions in the UK. Its purpose is to protect the public by promoting high standards of education, performance and conduct amongst opticians.

The College hosts the secretariat for the All-Party Parliamentary Group (APPG) on Eye Health and Visual Impairment, which, the optical bodies are key stakeholders in. After listening to speakers at the 3 November meeting which looked at digital inclusion for people with sight loss, we wish to offer the following comments:

*Q1. Which of the three options do consultees favour, and why?*

We would like to see option 2 implemented to increase the amount of available audio described content required by all channels to 20%. The audio described content that is already available makes a significant difference to the quality of life for people with visual impairment.

Speakers at the APPG strongly impressed the effects to which people with sight loss can feel socially excluded by not being able to access popular entertainment content. Audio description provides the visually impaired with access to such content and is invaluable in order to follow complex plots and plays in film and television. We are keen to highlight the importance of social inclusion one feels in being able to discuss film and television with others; audio description enables those with sight loss to retain a quality of life, closer to how it was before losing their sight. A recent study by the Thomas Pocklington Trust noted that many people who suffer sight loss suffer depression, with a reduction in social functioning being one of the leading causes.

*Q2. Do consultees have any further suggestions for future access service provision? If so please provide the rationale for these suggestions*

It was noted at the APPG that channels often use repeated content to reach the 10% figure of audio content currently required. This means that channels are actually making less than 10% of their unique content available to people with sight loss. For example, a soap opera may be shown with audio description in its original showing, its repeat and its omnibus edition. This means that people with sight loss are excluded from over 90% of a channel's content; changing the rules to make defined percentages of unique content audio described, signed and subtitled would lessen this problem and make television more accessible for people with sight and hearing loss.

We would also like to see Ofcom enforce further access provision by ensuring that not only is audio description required but also other services such as channel readouts, audio programme guides and audio set up menus on such systems as SKY, Virgin or Freeview must be offered. These services are also hugely important to those with visual impairment wishing to access television services.