

## Your response

| Question                                                                                                                                                                                                  | Your response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| <p><b>Question 1:</b> Do you agree with our proposed methods for determining whether the IPS makes, or is capable of making, a significant contribution to the PSB's individual public service remit?</p> | <p>Confidential? N</p> <p>We agree with Ofcom's proposed methods and suggest that the assessment of whether an IPS contributes to the PSB's public service remit should also consider the frequency and consistency of content that reflects the lives and experiences of people with disabilities. As public service broadcasters have a unique role in representing diverse communities, including people with disabilities, ensuring that these topics are regularly featured within the remit will make a significant contribution to the PSB's obligations.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <p><b>Question 2:</b> Do you agree with our proposed methods for determining whether public service remit content included in the IPS is readily discoverable and promoted by the service?</p>            | <p>Confidential? N</p> <p>We agree with the proposed methods, and we would suggest that Ofcom consider the promotion of disability-related content within high-traffic areas of the IPS, including the homepage and main navigation. For example, PSBs could regularly feature on their platforms news, current affairs segments, and promotional content for programmes that feature or focus on characters with disabilities, making it easier for users to find this content. This approach would not only provide greater visibility for disability-related programming but also help to normalise the presence of disability in society. Regularly updating the homepage with content related to accessibility, inclusion, and disability advocacy would ensure the information is both discoverable and relevant to a wider audience. Any highlights of popular programming should also carry tags to indicate that the programming has access features, such as subtitles, audio description, and/ or sign language.</p> <p>A measure of whether content is discoverable must also be underpinned by whether the service is accessible. If the platform is not screenreader friendly then the content will not be discoverable by screenreader users.</p> |

| Question                                                                                                                        | Your response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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|                                                                                                                                 | <p>The high traffic areas suggested in the consultation document including the ‘hero banner’, themed rails on the homepage, recommendations within search functions and auto-playing programmes. These interface patterns are not always easy to make accessible to screenreader users. Hero Banners and autoplaying content can sometimes drag focus away from, or talk over, the content being read by a screenreader. The titles of themed rails are not always read out and recommendations in search functions may be hard to present via a screenreader if they are suggested while the user is entering search terms. Whilst these are good ways to nudge users towards content they may not otherwise discover it is important that service providers perform user testing to ensure that they are accessible or at least do not damage the accessibility of the service.</p> |
| <p><b>Question 3:</b> Do you agree with our proposed methods for determining whether it is appropriate to designate an IPS?</p> | <p>Confidential? – N</p> <p>RNIB largely agree although the judgement of whether an IPS meets the needs of an audience should include whether it meets the needs of blind and partially sighted people through suitable accessibility features. This also applies in regard to identifying the audience for second and further IPS in that a subset of any specified intended audience must be assumed to have sight loss. Explicitly excluding people with sight loss would be prohibited under the Equality Act 2010 since it does not constitute an editorial decision and Ofcom is barred from allowing the exclusion of people with sight loss by the Public Sector Equality Duty outlined by section 149 of the Act.</p>                                                                                                                                                        |
| <p><b>Question 4:</b> Do you agree with our proposed process for IPS providers to apply for designation of an IPS?</p>          | <p>Confidential? – N</p> <p>We would add a requirement for providers to commit to accessibility in IPS. Where accessibility shortfalls exist providers must present a proactive plan to address this, backed up by specific, measurable targets and review dates. If targets are not met and Ofcom considers this due to a lack of</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

| Question                                                                                                  | Your response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|                                                                                                           | <p>commitment then this should trigger a review of the appropriateness of the IPS for designation.</p> <p>A commitment to accessibility would also encompass the adoption of new accessibility features where these become sufficiently mainstream in the market. If a feature is considered sufficiently mainstream then Ofcom should work with the industry to plan adoption of the feature ensuring that the plans are proactive but not overburdensome.</p> <p>This is in-line with the requirement of PSBs to “...satisfy the needs and interests of as many different audiences as possible...” as outlined in the appropriateness measure in the consultation document and Ofcom’s Public Sector Equality Duty to advance equality of opportunity between people who share a relevant protected characteristic and people who do not.</p> |
| <p><b>Question 5:</b> Do you agree with our proposed methods for revocation of designation of an IPS?</p> | <p>Confidential? –N</p> <p>As outlined in our answer to Question 4, RNIB would recommend that if a lack of progress on improving accessibility is judged to be caused by a lack of commitment to accessibility then this should trigger a review of the appropriateness of the IPS for designation. This could, if not remedied, result in revocation of designation of the IPS.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

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