

Revised Guidance for Public Service Broadcasters on Commissioning Codes of Practice: RNIB 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.

RNIB welcomes the opportunity to respond to this consultation.

Consultation Response

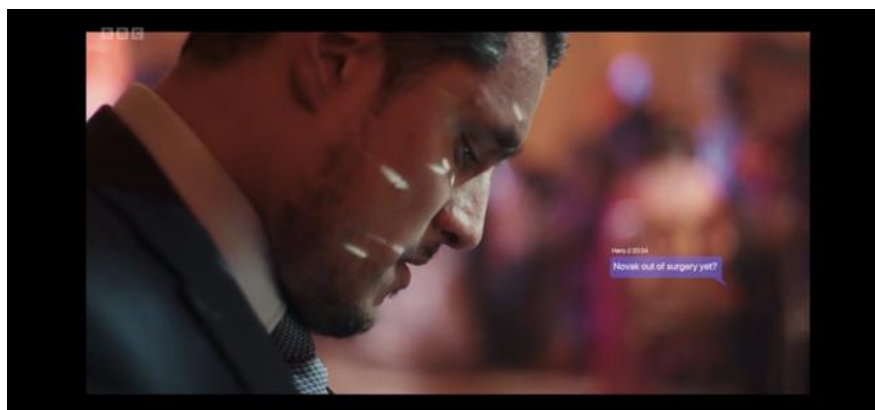
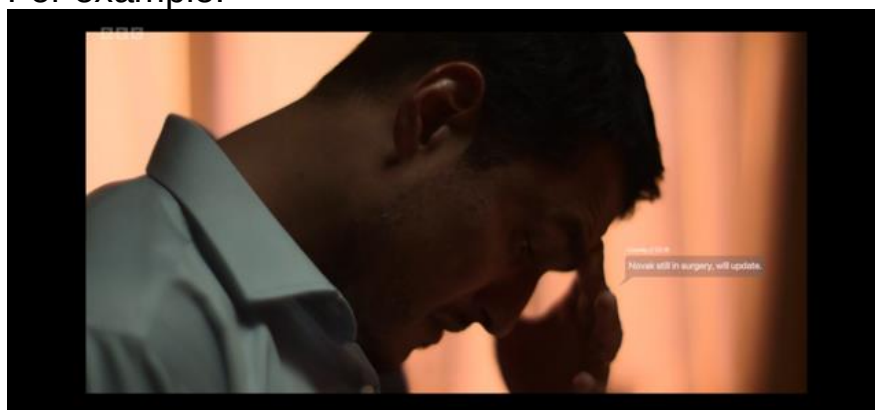
Question 1: Do you have any comments on our approach and proposed draft Guidance?

We are happy to see that Ofcom mention accessibility in relation to the commissioning guidelines themselves but not requiring the guidelines to call for accessibility is a missed opportunity. Two areas where these guidelines could be used to improve accessibility are onscreen text and audio led content.

On-screen text

We have highlighted in other consultation responses that onscreen text, especially in relation to SMS messages in dramas, and subtitles for foreign language content are often low contrast and hard to read.

For example:



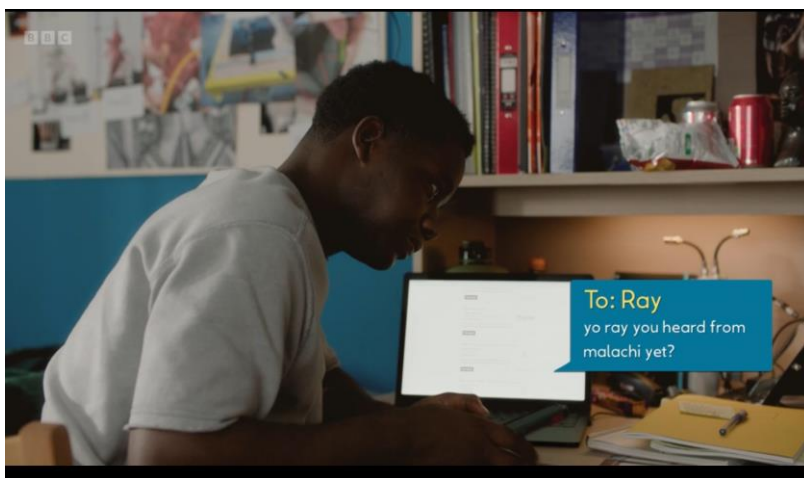
These screenshots are from the BBC drama Virdee.

As you can see from the screenshots:

- The text used is very small.
- The contrast is poor (especially in screenshot 1).

Although not visible in the screenshots, it was also reported that the information was displayed for far too brief a period in the programme.

In contrast, here is a good example of how text could be displayed on screen:



These screenshots are from the BBC drama Boarders.

The use of commissioning guidelines gives broadcasters control over these aspects of content. Broadcasters could mandate that any on-screen text intended to be read complies with minimum contrast ratios or employs an alternative method of accessibility. In this way creative freedom is protected as long as it does not exclude audiences.

Often programmes that need little or no audio description contain text at the end to provide an update on things that have happened after the programme has finished filming. This is not read out which creates a problem for our members and lets down a programme that was largely

accessible without audio description with an inaccessible ending. Commissioning guidelines could state that this must be read out or could require a timed-text file, such as those used for subtitles, to be delivered with the content to enable an expedited workflow in creating an audio description file.

Audio-led programming

Audio description is well established and well received in the UK, being an essential viewing companion for people with sight loss. Many programmes, however, would not need audio description if accessibility had been considered at the production stage. By adjusting scripts to make content audio led it could be accessible by default. This creates a more inclusive viewing experience as people with sight loss can watch alongside friends and family without having to turn on AD. It also means the money that would have been spent on creating an AD track for that piece of content can be spent on describing something else, increasing the accessible output of a broadcaster.

The consultation document states that PSBs have a regulatory obligation to create “visual content which meets the needs and satisfies the interests of as many different audiences as possible”. A failure to stipulate accessibility standards in commissioning guidelines is a failure to meet the needs of audiences who would benefit.

We understand that Ofcom cannot specify particular terms to be included in the commissioning guidelines but Ofcom is subject to the Public Sector Equality Duty and must “have due regard to the need to... advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it”. Specifying that commissioning guidelines must include accessibility measures to ensure commissioned works do not create unnecessary unremedied accessibility barriers would help to advance equality of opportunity without prescribing how broadcasters go about this. Alternatively, as we have argued in the past Ofcom could set a quota for the amount of content that is accessible which would include content that is accessible with audio description and content that is accessible without it. This would be higher than the current quota for audio description but would be

a better measure of the accessibility of broadcast content and would encourage accessible content to be more inclusive.

Considering accessibility earlier generally makes it cheaper and easier to implement and can make it better integrated and more inclusive. Not using commissioning guidelines to enforce or encourage this is a huge missed opportunity.

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