

RNIB response to Ofcom's Review of proposed increased amount of archive content on BBC iPlayer

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 Response

Question 2: Do you agree with Ofcom's initial assessment that the Proposal is not material? If you disagree, please provide any evidence supporting your reasoning.

RNIB agree.

The BBC has been a British institution since its launch one hundred years ago. Over this time it has created many shows which have become almost synonymous with British culture and creativity. The BBC should have flexibility to make this content available to the viewing public to whom it belongs. This will give the British public access to some of the best loved moments of British TV history.

Every effort should also be made, however, to ensure that these great moments of British TV are accessible to blind and partially sighted people.

If a legacy show is added to iPlayer because it was popular when first broadcast then it should carry audio description if it is not naturally accessible. If someone with sight loss has a popular show recommended to them by a friend or family member then they should be confident that it will be accessible.

Content that was audio described when broadcast must be audio described when presented on iPlayer. If later seasons of a show are audio described then any previous seasons of that show must also carry audio description regardless of whether they were originally broadcast with it. Otherwise, any audio description user will not be able to watch from the beginning.

Section 5 of the BBC charter states that:

“The Mission of the BBC is to act in the public interest, serving all audiences through the provision of impartial, high-quality and distinctive output and services which inform, educate and entertain.”

iPlayer can only “...serve all audiences...” if the content is as accessible as possible. This not only covers the content itself but also the way it is delivered. This means the player is accessible without sight on as many platforms as possible.

rnib.org.uk

RNIB would like to remind the BBC of their legal duties both under the Public Sector Equality Duty to “advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it” and under the BBC Charter to “...serve all audiences...”. Blind and partially sighted people are part of the BBC’s audience and deserve to be able to share in any increased offering the BBC makes available.

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