

Ofcom review of public service television broadcasting

RNIB's response

1. Introduction

The Royal National Institute of the Blind (RNIB) is the leading organisation representing the needs and interests of the two million people in the UK with a sight problem. We provide a wide range of services and campaign for social inclusion and equality of access. RNIB works directly and indirectly with blind and partially sighted people, representative organisations, visual impairment professionals, national and local government, the broadcasting and entertainment sector, and a range of public and private organisations.

Since its Needs Survey* in 1991 showed that 94% of blind and partially sighted people watch television RNIB has taken an active role in highlighting access issues. We have worked to try to ensure access to programmes, services and equipment, both by direct work with broadcasters and manufacturers and by influencing legislation.

The broadcast media plays an important role in the lives of blind and partially sighted people by providing access to news, information and entertainment. This is particularly valuable for people who are housebound or isolated, often those who are elderly or with additional disabilities. This role has become particularly important since the introduction of digital television, which provides considerable opportunities with the availability of more channels and services, and better picture and sound quality. However, for the majority of blind and partially sighted people these advantages are offset by the problems in accessing services and equipment and the limited availability of audio description.

2. Comments on the PSB principles

RNIB welcomes the opportunity to contribute to the debate on the future of public service broadcasting, which plays an important role in the provision of high quality television programmes in the UK covering a breath of output ranging from popular to minority interest programmes.

RNIB has specific comments on the PSB principles as set out by Ofcom in the consultation document.

2.1. PSBs need to contribute to resolving technical access issues

The proposed PSB principles state that PSB programmes should be “widely available – if content is publicly funded, a large majority of citizens need to be given the chance to watch it”.

As PSB content is publicly funded, disabled citizens need to be given the chance to receive it just like their sighted peers, also when new technologies and distribution systems are being used. Therefore a requirement for PSBs to contribute to solving technical access issues needs to be enshrined in the PSB principles.

Public Service Broadcasters have already played a major role in developing and providing access services for people with a sight problem, but a range of digital access problems remain unresolved. It is essential that the contribution of public service broadcasting to resolving these does not only continue, but that public service broadcasting is better equipped and strengthened in order to deal with outstanding access problems and new access problems as they emerge.

2.2. PSBs need to contribute to a tolerant and inclusive society

We think that proposed principle stating that the purpose of PSBs is to “make us aware of different cultures and alternative viewpoints, through programmes that reflect the lives of other people and other communities, both within the UK and elsewhere” should be strengthened to ensure that PSBs in the digital era continue making a significant contribution to a tolerant and inclusive society. Such a clause will ensure that PSBs continue and increase their efforts to raise awareness of disability, combat disability discrimination and provide opportunities for disabled people. These efforts should also be monitored and benchmarked across PSBs.

PSBs should be explicitly required to ensure that disability is portrayed as an everyday occurrence in its mainstream programming by ensuring that actors and presenters with disability

feature in a range of programmes, not only those aimed at disabled audiences.

In addition, PSBs should be required to ensure that specialist programmes on particular issues relating to disability feature in its programming because mainstreaming disability in general programmes does not reduce the need for these programmes, especially as the incidence of disability in society, for example the incidence of sight loss, is on the increase with the ageing of the population.

Finally, Ofcom should consider the best way of giving disabled programme makers the opportunity to broadcast their programmes via digital platforms, e.g. by allocating open access channels for use by new and existing disability stations.

3. Responses to Ofcom's specific consultation questions

Question 1: Do you agree with our analysis that the existing PSB system will not survive the move to the digital age, and may decline before then?

RNIB agrees with this analysis and is very concerned about this development as PSBs have to continue to make a strong contribution to access to television for blind and partially sighted people.

Question 2: Do you accept that public funding for PSB continues to be justified as we approach switchover, and should remain broadly at a similar level to that provided today?

Public funding remains justified and essential, because market forces will not deliver the quality and diversity of broadcasting that people currently enjoy. The funding arrangements for PSB have to ensure that more funding becomes available to allow PSBs to continue to provide access services such as quality audio description of a range of programmes and to increase the provision of audio description to 50% of programmes.

In addition, extra funding should be made available for PSBs to increase their contribution to providing technical access solutions for blind and partially sighted people. This is important for existing

access problems in the area of electronic programme guides, digital interactive services and digital teletext as well as other access problems that might emerge when digital TV branches out to new technologies and distribution systems.

We welcome the idea of a Public Service Publisher, providing that this service is required to make a substantial contribution to achieving affordable access for disabled people.

Question 3: Is plurality vital to the future of PSB?

Plurality of PSB providers is essential to ensure that disability awareness, tolerance and inclusiveness are promoted in UK broadcasting and that solutions for disability access issues are being developed.

Question 4: Will PSB need to take a new form, across new technologies, in future? If so, which technologies should PSB embrace in the digital world?

We welcome the approach that PSB would distribute content over a wide range of digital platforms, using a variety of techniques to reach households and distributing programmes on other digital systems such as broadband and mobile networks.

RNIB strongly urges OFCOM to ensure that the PSP has a duty to ensure that affordable access solutions to these platforms are researched and developed. The PSP should be asked to make a substantial contribution to the development of a technical solution to issues such as audio description on digital cable TV, reception of audio description on mobile networks, access to digital interactive services for people with sight problems.

Otherwise, disabled people such as blind and partially sighted people will be excluded from benefiting from the PSP and the contribution the PSP makes to informing and increasing understanding, stimulating interest and knowledge, strengthening cultural identity, raising awareness of different cultures and alternative viewpoints. Blind and partially sighted people have the same rights as their sighted peers to benefit from the contribution made by the PSP on all digital systems.

Question 5: Do you agree that the BBC should remain the cornerstone of PSB, but that there ought to be mid-Charter review and a clarification of the roles of governance and regulation?

We welcome the emphasis on the role of the BBC in producing public service broadcasts, but agree that the BBC should not be the only organisation providing public service broadcasting.

RNIB believes that the Charter review should ensure that the BBC in the future continues to play a lead role in making digital broadcasting accessible and beneficial for blind and partially sighted people by

- Identifying access problems (e.g. problems in accessing electronic navigation tools such as electronic programme guides; problems in accessing digital teletext services or interactive and on-demand services for people with sight problems).
- Carrying out research and user testing in these problem areas to achieve affordable open standard solutions that can be implemented across the industry.
- Increasing the amount of audio description on all BBC channels, encouraging other broadcasters to do the same. RNIB would recommend that ideally 50% of programmes should be audio described.
- Promoting audio description as a benefit of switching to digital TV e.g. by providing open audio description on analogue television to ensure greater general public awareness.
- Using the BBC's technical experience to encourage more manufacturers to produce audio description capable Freeview receivers. Develop partnerships to ensure that accessible digital receivers are available in the market.
- Ensuring continuing high quality programmes are provided on digital television, as an incentive to move to digital, but also on analogue in order not to penalise late adopters.
- Playing a leading role in promoting both digital television and audio description to blind and partially sighted people. This involves ensuring that all communications about these services are available in accessible formats and that on-air promotional material contains sufficient verbal information to make it fully comprehensible for viewers with sight problems.

- Providing information that makes it easy to understand how to access digital television and radio services and equipment.
- Working with others to achieve a long-term free-to-view, cost effective, digital satellite service, particularly to enable viewers to receive digital services prior to switch-over.

Question 6: Do you agree with our proposals on the future funding of the BBC?

RNIB agrees that the BBC should continue to be funded by the licence fee and would like to emphasise that the concessions for blind viewers and older people should be maintained. The allocation of the licence fee funding should go hand in hand with stringent disability access conditions as outlined in our response to question 6 and question 14.

Question 7: Do you think we have judged ITV1's PSB role correctly, both in the short term and the longer term?

ITV should continue to fulfil an important PSB role and should continue to contribute to access to television for disabled people.

Question 8: Do you agree with our proposals for the role of Channel 4, and are we right to ask Channel 4 to look to self-help and joint ventures to fund PSB for the foreseeable future? Question 9: Should other means of support for Channel 4's remit be considered in the longer term? If so, what form should they take?

We agree with the analysis that Channel 4, because of its not for profit status, has made a unique contribution to public service broadcasting.

Channel 4 contributes to the range and quality of accessible programmes for blind and partially sighted people. It is therefore important that we have a strong and healthy Channel 4 and that the options to make this happen are being considered at an early stage and not when switchover is well under way.

Question 10: Are we right to take a more flexible approach to the regulation of PSB on Five? Question 11: Do you support this long-term vision of programming for the nations and regions?

Irrespective of what approach is taken, Five should continue to make a significant contribution to meeting the needs of disabled viewers, including blind and partially sighted viewers.

Question 12: Do you support our specific proposals for the future of regional programming on ITV1? Question 13: What do you think a sustainable model for PSB in the nations would be? Question 13: Do you think this is the right approach? What issues should we take into account in judging whether further action is needed in 12 months' time?

The future of regional programming should not lead to a reduction in regional programming by PSBs across the board. Regional programming is a main source of information for blind and partially sighted people who do not have the same level of access to other sources of information such as print media as their sighted peers. If more production happens outside London, this should be done in such a way that increased employment and training opportunities arise for disabled people. When independent producers are involved, they should be made fully aware of disability issues and should be trained on disability awareness in the same way as the permanent staff of any of the PSB broadcasters would be.

Question 14: Do you agree with our assessment and preference for a system which introduces competition for the provision of PSB?

Competition for the provision of PSB seems a good way forward, providing that all PSBs (including a PSP) are required:

- To ensure that their content is accessible to blind and partially sighted people by providing audio description, preferably at a 50% of programs level
- To contribute to solving technical access solutions for all platforms it is intending to use for distribution of programming
- To deliver specialist disability programming
- To deliver mainstream programming that is reflective and inclusive of disability issues
- To provide training and employment opportunities for disabled people
- To have disabled people or their representative organisations on their governing structure.
- To have mechanisms in place to monitor the above

- To publish a report about their performance on these criteria on a regular basis

Question 15: is the idea of a public service publisher one worth pursuing? If so, what form should the new service take? How should a PSP be awarded?

The above mentioned access requirements and disability related criteria (see question 14) need to be included as essential criteria that have to be met by any bidders.

In addition, Ofcom needs to consider what is the best way of giving disabled programme makers the opportunity to broadcast their programmes via digital platforms, e.g. by allocating open access channels for getting new and existing disability stations.