

# **RNIB's response to the BBC's editorial guidelines consultation**

## **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. Blind and partially sighted people have expressed a great deal of interest in IoT technology and its potential benefits for them.

## **Consultation response**

The RNIB welcomes the BBC's review of its editorial guidelines and strongly emphasises the importance of embedding accessibility considerations throughout the core guidelines. While the BBC maintains a separate document for policy and editorial requirements specific to visually impaired audiences, integrating accessibility directly into the main editorial guidelines is crucial. This mainstream approach ensures that accessibility is not treated as an afterthought but becomes a foundational principle, enabling blind and partially sighted audiences to engage fully with BBC content.

“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.” – BBC Charter

The Charter continues to outline the Public Purposes of the BBC:

- To provide impartial news and information to help people understand and engage with the world around them,
- To support learning for people of all ages,
- To show the most creative, highest quality and distinctive output and services,
- To reflect, represent and serve the diverse communities of all of the United Kingdom's nations and regions and, in doing so, support the creative economy across the United Kingdom, and
- To reflect the United Kingdom, its culture and values to the world.

These need to be considered in the context of "...serving all audiences..." which includes blind and partially sighted people. If people with sight loss are not informed by the BBC because the news output is not accessible, if their learning is not supported because educational content is not accessible, if they miss out on creative, distinctive and high quality content because the content is not accessible or if they do not see themselves in the BBC's output because depiction of people with disabilities is missing or stereotypical then the BBC is not serving all audiences and has failed in its public purposes.

In order to help steer the BBC's work towards serving all audiences RNIB's response highlights the need for accessibility to be addressed comprehensively in areas such as partnerships, technological innovation, interactive content, and legal compliance. Specific recommendations include:

- Requiring accessibility features (e.g., audio description or enhanced commentary, subtitling, and screen reader compatibility) in all partnerships and content agreements.
- Ensuring emerging formats like VR, AI-driven content, and immersive experiences are accessible from the outset.
- Embedding accessibility standards into voting systems, competitions, and interactive features to promote inclusivity.
- Establishing accountability through transparent reporting on accessibility performance in external relationships and partnerships.

By aligning its editorial guidelines with accessibility best practices, the BBC can lead the way in creating inclusive content that reflects its commitment to serving all audiences equally.

## **Section 1**

### **Section 1.7: Complaints**

The Broadcasting Agreement notes that “...making a complaint must be straightforward and accessible”. [1] The BBC Charter also notes that the BBC’s complaints framework must “...provide transparent, accessible, effective, timely and proportionate methods of securing that the BBC complies with its obligations”. [2]

While the current web-based system for logging complaints on the BBC website is technically accessible, significant usability issues persist. This has led many people with sight loss to contact RNIB for assistance in completing the form. We strongly urge the BBC to reconsider its complaints process to make it more user-friendly, ensuring all audiences can easily reach the public broadcaster. Additionally, the telephone complaints system often falls short, as call handlers frequently lack the knowledge to address accessibility-related issues, particularly those concerning screen readers and audio description. This results in callers getting in touch with RNIB for support. At present, RNIB often assists end users by completing the complaint form on their behalf and relaying the BBC’s responses. This is an unsustainable workaround, and we recommend the BBC improve its complaints handling process to better meet the needs of blind and partially sighted audiences. Without an accessible, usable and robust complaints procedure the BBC risks being unaware of accessibility problems and risks damaging their reputation with blind and partially sighted people.

### **Section 1.8: Accessibility**

RNIB welcomes the inclusion of accessibility as a core value in the BBC’s Editorial Guidelines. However, we recommend further strengthening this section by emphasising proactive consideration of accessibility during all stages of production. For example:

- Ensure that audio description (AD), subtitles, and screen-reader-friendly user interfaces are consistently implemented across all platforms, including emerging formats such as augmented reality and virtual reality.
- Require all content—including interactive games and immersive experiences—to meet accessibility standards, providing equal access to blind and partially sighted audiences.
- Commit to regular audits and consultations with accessibility experts and user groups like RNIB to ensure compliance and effectiveness.

The section on Accessibility in the guidelines covers just over 100 words and makes no concrete recommendations. Whereas other sections provide specific URLs to external resources for clarification the accessibility section gives no URL for further guidance and expects the reader to search for it themselves. The document says, “Producers must take account of the requirement that, as far as reasonably practicable, BBC content is accessible to those audiences.” But this is undermined by the lack of signposting to a concrete resource for guidance.

The BBC does have dedicated guidelines on accessibility for visual impairment and hearing impairment [3] with a set of key points for both. This document should be explicitly linked to from the editorial guidelines. The key points are generally high level enough to be future proof if repeated in the editorial guidelines and if copied verbatim would only add 660 words to a document that is around 90,000 words long. They would increase the length of the document by under 1% but would convey a commitment to accessibility which is not otherwise apparent.

Some of the points that we raise elsewhere in this response are covered in the BBC’s guidelines online. The fact that they are not adhered to in practice suggests that those guidelines are not being read by content producers. This may be rectified by incorporating them more directly in these editorial guidelines. A version of the key points for accessibility for people with sight and hearing loss should be included in these editorial guidelines as well as a URL pointing to the guidance in full.

By addressing accessibility needs during production rather than as a retrospective adjustment, the BBC can lead the way in ensuring no audience is excluded.

## **Section 3: Accuracy**

### **Section 3.4: Accuracy, reporting statistics, and content clarity**

While accuracy is paramount, RNIB recommends that the BBC also considers accessibility in how information is presented visually and aurally. Specifically:

- When reporting statistics or displaying data on screen, ensure that charts, graphs, and text overlays are described or accompanied by alternative formats accessible to blind and partially sighted viewers. For example, integrate descriptions of on-screen data into voice overs/ commentaries.

- Avoid practices that lead to inaccessible content such as onscreen text without audio narration or foreign language soundbites without dubbing in programmes that do not carry audio description (e.g., news and current affairs).
- Create guidelines for accessible presentation formats, particularly in areas where complex data is visualised, to ensure that all audiences, including those relying on screen readers or audio narration can fully engage with the content.
- Social media posts and user-generated content from the BBC should include accessible elements, such as alt text for images, captions for videos, and audio narration/ voiceover for multimedia content. Accessibility should be part of the quality standards applied to all BBC platforms, including social media.

## **Section 5: Harm and offence**

### **Inaccessible content design**

Ensure that content meant to be informative, such as public service announcements or sensitive stories, does not exclude blind and partially sighted people due to inaccessible design elements (e.g., important onscreen text or graphics without audio narration).

### **Trigger warnings and viewer sensitivity**

Ensure that any warnings about sensitive or potentially distressing content (e.g., for scenes involving violence or discrimination) are provided in audio format, not just visually. This practice will ensure that blind and partially sighted audiences have equal opportunity to make informed decisions about viewing.

### **Content balance and stereotypes**

Avoid harmful stereotypes or offensive portrayals of blind and partially sighted people in programming. Actively consult with disability advocacy groups, including RNIB, to review content for fair and accurate representation.

## **Section 9: Children and young people as contributors**

### **Inclusion of blind and partially sighted contributors**

Explicitly include guidance to ensure that blind and partially sighted children are adequately supported when contributing to content. This

includes providing reasonable adjustments, such as accessible formats for scripts, interview questions, or schedules. Ensure that these contributors are represented authentically and avoid perpetuating stereotypes. Blind and partially sighted children should not be presented solely through a lens of vulnerability or as figures of inspiration without proper context.

## **Parental consent**

When securing parental consent, ensure the accessibility of consent forms and associated materials. These should be available in alternative formats, including braille, large print, or digital versions compatible with screen readers, so that parents or guardians who are blind or partially sighted can engage equally in the process. Sighted children may have parents or guardians with sight loss so accessible forms should be available in all situations.

## **Representation beyond stereotypes**

Content should reflect the diverse experiences of children and young people with sight loss, showcasing their capabilities and ambitions rather than focusing solely on their disability.

## **Section 10: Politics and public policy**

### **Accessible presentation of political content**

Mandate that all visual elements, including graphs, charts, and statistics presented during political programming, are made accessible. This could include ensuring visual data is accompanied by voiceover/ commentary. Subtitles and audio description should be included as standard for any video segments used in political discussions unless they are audio-led.

### **Representation in political reporting**

Actively include perspectives from people with disabilities, particularly blind and partially sighted people, when reporting on policies affecting these communities. This ensures that their experiences and needs are accurately represented in policy discussions. Avoid tokenistic representation by engaging with experts or lived experience advocates who can offer nuanced insights.

### **Coverage of accessibility in policy**

Encourage programming to cover accessibility as a mainstream public policy issue, focusing on areas such as transport, employment, and

digital inclusion. Highlight how legislation and government decisions impact people with disabilities, particularly blind and partially sighted people.

### **Debates and vox pops**

Ensure debates and vox pops involving the public are accessible, allowing participation from blind and partially sighted people. For instance, ensure live forums or phone-ins offer accessible options for engagement, such as screen-reader-compatible digital platforms.

### **Accessible election coverage**

Political coverage during elections must include accessible voting information and address issues affecting blind and partially sighted voters. This could involve showcasing the accessibility of ballot formats, polling stations, or online voting systems.

### **Compliance with accessibility standards**

Ensure all election-related materials, including polls and surveys, are presented in formats accessible to screen readers, magnification software, and other assistive technologies.

## **Section 11: Statistics, data, polls and survey**

### **Accessible presentation of statistics and data**

Ensure that all statistical information, charts, graphs, and data visualisations are described verbally during programming to make them accessible to blind and partially sighted viewers. Descriptions should include key takeaways rather than an exhaustive account of the data. Provide accessible alternatives, such as downloadable text-based summaries compatible with screen readers, to supplement visual data presented on-screen.

### **Surveys and polls**

When surveys or polls are presented, results must be summarised clearly and audibly to ensure those who cannot see on-screen graphics can still access the information.

## **Transparency in polling**

Accessibility considerations should be a criterion when selecting polling organisations to ensure their methods do not exclude disabled participants.

## **Simplifying complex data**

Commit to presenting complex data, such as economic or scientific statistics, in simplified terms to enhance understanding for all audiences, including those with disabilities. This could involve providing plain-language explanations and avoiding over-reliance on technical jargon.

## **Accessible academic research**

When referencing academic work, ensure the findings are summarised in accessible formats for wider public consumption. Include plain-text summaries alongside visual elements to remove barriers for screen-reader users.

## **Use of generative AI in data presentation**

Acknowledge the growing role of generative AI in creating visual content, such as infographics. Establish safeguards to ensure AI-generated content meets accessibility standards and does not inadvertently exclude audiences with disabilities.

## **Section 12: War, terror and extreme violence, disaster and disorder**

### **Use of foreign language soundbites and untranslated material**

In coverage of international conflicts, ensure that foreign language soundbites are translated and described. Many foreign language segments in news reports are provided only with subtitles and not a dubbed track, leaving blind and partially sighted audiences without the necessary context. It is essential that these segments be accessible through either a dubbed track or comprehensive audio description.

### **In disaster or emergency reporting**

the BBC's public service role becomes even more significant. Ensuring accessibility of critical updates to all audiences, including those with sight loss, is essential. This should include accessible live coverage, with sufficiently descriptive voiceovers or commentaries for visual content,

and ensuring key information such as evacuation notices, updates, and instructions are accessible to all.

## **Section 13: Use of BBC content after publication or broadcast**

The guidelines for re-use, reversioning, and the permanent availability of BBC content are an important consideration for ensuring that the BBC's output remains accessible long after its initial broadcast. For RNIB, ensuring accessibility is maintained in all instances of content reuse is critical, especially in online environments where accessibility features like subtitles, audio description, and access services metadata are sometimes overlooked.

### **Accessibility in reused and archived content**

When BBC content is reused, reversioned, or made available on platforms like iPlayer or Sounds, it is essential that accessibility features (e.g., audio description, subtitles, transcripts and sign language) are not removed. In some instances, content that originally aired with audio description or other accessibility features may lose these features when made available online. RNIB recommends that the BBC ensures these features are preserved across all platforms, regardless of the content's re-use.

### **Accessible metadata and search features**

For content available in the BBC archives or on streaming platforms, it is vital that accessible metadata is used to help blind and partially sighted users find content more easily. This includes ensuring audio description availability is clearly marked, and metadata is updated to reflect this. When users are searching for content, they should be able to filter results by accessibility features, including audio description and subtitles.

### **AI and content accessibility**

As the BBC explores AI technologies for reversioning content or providing new formats (e.g., interactive elements), RNIB encourages the BBC to ensure that any AI-generated content also complies with accessibility standards. AI could play a key role in improving content accessibility, but we must ensure that automation does not compromise the quality or availability of accessibility features. In particular, AI should be used to help enhance accessibility, such as by automatically flagging

where additional voiceover or description may be needed, especially for archived content.

## **Protection of accessibility standards in partnerships**

When partnering with third-party organisations or distributing content externally, the BBC should ensure that accessibility standards are upheld. Any external distribution, whether through streaming services or licensing deals, should mandate that accessible versions of content (with audio description, subtitles, etc.) are included in the deal. The BBC should hold external distributors to account for making content accessible, especially when it involves programming that already includes accessibility features. Public Service Broadcasters, and especially the BBC, have a reputation for accessibility so the BBC logo should be an assurance of basic accessibility features such as audio description.

## **Accessible updates for archived content**

Over time, content that was not originally accessible (e.g., lacking audio description or subtitles) should be revisited and updated to include these features. The BBC's archived material is an invaluable resource for the public, and it is important that this content reflects the BBC's public service remit to serve all audiences, including those with sight loss.

## **A focus on educational and public service content**

The BBC should ensure that all archived material remains accessible. Content used in educational settings, such as documentaries, teaching materials, or historical archives, must be fully accessible so that blind and partially sighted students can engage with these resources. This should be a key consideration when determining which archived content is reversioned for new purposes.

## **Section 15: Independence from commercial and other external interests**

### **External relationships with accessibility consideration**

When entering partnerships with external organisations or commercial entities, RNIB encourages the BBC to integrate accessibility considerations into the partnership agreements. For example, when collaborating with tech companies, media producers, or content distributors, the BBC should require that accessibility features—such as audio description or audio-led enhanced commentaries, subtitling, and

screen reader compatibility—are included from the start. This will ensure that blind and partially sighted users can access all content across platforms, regardless of external commercial arrangements.

## **Use of technology in commercial partnerships**

With the rise of emerging content formats and external partners, including those involved in AI, VR, or immersive content, RNIB emphasises the importance of these technologies being accessible from the outset. Any technology used in partnership with commercial entities should be evaluated for its compatibility with assistive technologies such as screen readers and magnification tools. This is especially important for interactive content and new formats, where accessibility often needs to be embedded early in the development process.

## **Section 16: External relationships, including commercial relationships, and financing**

### **Partnerships and accessibility inclusion**

As the BBC enters partnerships with external organisations, especially those in the technology sector (e.g., AI or VR companies), it is critical that accessibility is a foundational requirement. We recommend that accessibility features, such as audio description, subtitling, and screen reader compatibility, be embedded into all content from the outset of these partnerships. This ensures that blind and partially sighted people are not excluded from new technological innovations and immersive formats. Partnerships should also be assessed for their inclusivity, with specific attention to whether the content developed or distributed through these relationships meets the BBC's accessibility standards.

### **Funding and financing considerations for accessible content**

When considering external funding or financing for content, it is vital that funding bodies and external partners are aware of the BBC's commitment to accessibility and that this commitment is reflected in all funded projects, particularly in emerging media formats like gaming, VR, and interactive experiences. RNIB provides toolkits for making content, such as gaming and immersive formats, accessible, offering valuable guidance to producers unfamiliar with accessibility and user requirements.

## **Use of external technology for accessibility**

As external technologies (such as AI, machine learning, and automation) become more prominent in content production and distribution, RNIB urges the BBC to ensure that any third-party technologies used in production are tested for accessibility. For example, AI-powered tools used for content creation or curation should be evaluated for their compatibility with screen readers, magnification tools, and other assistive technologies. AI often learns stereotypes from training data. It then repeats, and in doing so, reinforces those stereotypes. Any use of AI for content creation or curation should be mindful of the requirement to avoid stereotyping blind and partially sighted people. In partnerships where external technology is involved, the BBC must ensure these technologies support the needs of blind and partially sighted users to maintain inclusive access to content.

## **Transparency and accessibility reporting in external relationships**

Transparency should be maintained regarding the accessibility impact of commercial and external partnerships. RNIB recommends that the BBC publishes regular reports on how its external relationships, sponsorships, and partnerships are addressing accessibility. These reports should highlight successes, challenges, and areas for improvement in making content accessible across all platforms. Publicly available updates will help ensure that accessibility remains a priority and that external relationships do not result in unintended exclusions.

## **Section 17: Competitions, votes and interactivity**

### **Accessibility in interactive competitions and voting systems**

Interactive competitions and voting systems, particularly those that engage large audiences, should be fully accessible to people with sight loss. This includes ensuring that all voting interfaces, whether through mobile apps, websites, or SMS, are compatible with screen readers and magnification tools. RNIB encourages the BBC to make all interactive elements in competitions, quizzes, and votes fully accessible, ensuring blind and partially sighted people can participate.

### **Clear and accessible instructions for participation**

For competitions, voting, and interactive content, RNIB recommends providing clear, concise, and accessible instructions for participation.

This should include alternative formats for audio and text, so participants who use screen readers, braille, or other assistive technologies can easily understand how to engage.

## **Accessible technology for virtual and augmented reality (VR/AR)**

As new technologies such as VR and AR are increasingly used in interactive content, RNIB urges the BBC to consider accessibility in these immersive experiences. VR/AR interactive events should be designed with accessibility in mind, ensuring compatibility with assistive technologies such as screen readers and magnifiers, as well as the ability to customise the user interface for blind and partially sighted users. Accessibility should be tested early in the design process to avoid barriers in participation. Significant research, including studies conducted by the BBC, has been carried out over the years to understand how immersive formats can be made accessible while maintaining their immersive quality.

## **Consideration for audio description or enhanced commentary in interactive broadcasts**

Where interactive content is broadcast, it is important that an enhanced commentary or audio description is made available for any visual elements, including in competitions, live events, and audience participation segments. If a competition or interactive segment is visual in nature, additional audio should be provided to ensure that blind and partially sighted people can fully understand the content. This is particularly important when participants are required to view and interact with visual information, such as images, videos, or on-screen graphics.

## **Accessible feedback and results**

Once a competition or interactive event concludes, RNIB recommends that results and feedback be made accessible. This includes ensuring that winners are announced via accessible means, such as audio or screen-readable text, so that blind and partially sighted people are not excluded from knowing the outcome of events in which they have participated. Accessible formats should also be provided for any post-event content, such as summaries or recaps, to ensure that all viewers have access to the information shared.

## **Proactive engagement with accessibility experts**

As interactive content and competitions evolve, RNIB suggests that the BBC proactively engage with accessibility experts, including blind and partially sighted people, to ensure these features remain inclusive. This could include forming a dedicated accessibility advisory group for competitions and interactive media, providing ongoing feedback and insights on how to improve access for users with sight loss.

## **Section 18: The Law**

RNIB welcomes the BBC's commitment to adhering to legal standards and ensuring the responsible use of its content, especially in relation to privacy, consent, and the safeguarding of individuals. As the BBC navigates these areas, it is essential that accessibility remains a priority in compliance with the law, as this is crucial for ensuring all viewers, including blind and partially sighted people, have equal access to content and are not inadvertently excluded due to inaccessible practices. Below are the areas where RNIB recommends that accessibility considerations be integrated into the legal guidelines:

### **Content licensing and accessibility**

RNIB suggests that when the BBC licenses content or collaborates with third-party content providers, the BBC should ensure that accessibility requirements are outlined in any contractual arrangements. This should include specific commitments for audio description, subtitling, and other accessible formats, as well as accessibility testing for third-party platforms and devices that distribute BBC content. Such measures would ensure that accessibility is considered in the licensing process, and all third-party content made available on BBC platforms meets accessibility standards.

### **Enforcement of accessibility standards in content creation**

In alignment with the BBC's editorial guidelines, RNIB recommends that the BBC enforce accessibility standards for both internal content creation and external production partners. Legal requirements related to accessibility should be included in any production contracts, and compliance should be monitored to ensure that no content falls below the minimum accessibility thresholds. This is particularly important for content that will NOT be audio described. For example, any graphics or text on screen are voiced, any foreign language soundbites are dubbed. This will ensure that accessibility is embedded in every stage of content

creation, from pre-production through to broadcast and on-demand distribution.

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3 <https://www.bbc.com/editorialguidelines/guidance/visually-and-hearing-impaired-audiences>