

Delivering Digital Britain: The Interim Report

Comments from the Royal National Institute of Blind People (RNIB)

RNIB welcomes the Digital Britain Interim Report and the emphasis the government is putting on the digital information and communications sector.

Digital Inclusion is not just a vital sector for the economy, but also for the inclusion of disabled people and indeed all people in society. RNIB is therefore taking this opportunity to comment on the Report in the interests of helping to ensure that the Digital Britain initiative serves blind and partially sighted people as well as their sighted peers.

Blind and partially sighted people rely on and want to use the digital world as much as, and in some cases more, than their sighted peers. What is more, technology can be empowering for blind people. Whereas a few short years ago a blind person would have relied on somebody else to read their correspondence, text-to-speech screen readers provide a speedy and autonomous alternative. Internet shopping can enable a blind person -who finds it hard to travel to a shop- to purchase the goods they need without leaving their house.

We recently responded to “Delivering Digital Inclusion: An Action Plan for Consultation”. We will not repeat the content of that response here, but we append our response at the end of this document for ease of reference. However, we wish to recall that:

- Using information and communication technology (ICT) and mobile phones has become a key skill for everyday living, enabling access to services, products and leisure opportunities as well as education and employment. These technologies have the potential to be very empowering, further improving independence.

- Blind and partially sighted people face particularly severe obstacles due to the inaccessibility of equipment and services and this restricts their use and enjoyment of digital technologies.
- RNIB believes government leadership is absolutely vital at this time, and we made several recommendations to the DCLG in our comments on digital inclusion

We believe it is vital that the Digital Britain initiative take fully into account the inclusion of blind and partially sighted people. RNIB is pleased therefore that one of the five objectives in the Digital Britain report covers “fairness and access for all”. We are concerned however that neither people with sight problems nor disabled people in general are specifically mentioned at any point in the interim “Delivering Digital Britain” report.

RNIB Comments on specific proposed actions

We concentrate our comments below specifically on the proposed actions in the Digital Britain report, focusing on those of most relevance to blind and partially sighted people.

“ACTION 7

We will consider at what point and at what cost the standard offer provided by the Digital Television Switchover Help Scheme could have a return path capability, and we will ensure that such capability is available as an option.”

RNIB was a chief driver behind the Help Scheme, and we welcome the report’s acknowledgement of the use of the Help Scheme and its possible relevance to the roll-out of broadband. A return path could enable access for many people who would otherwise be at risk of exclusion from digital services. As such RNIB welcomes this work. Furthermore, we believe that early work should be undertaken to ensure that any “return path” capability that is devised is made accessible to blind and partially sighted people so they are not excluded from this option. This would have to be done through inclusion of text-to-speech solutions that read out information on the screen, similar to computer screen reading technology.

However, RNIB is also concerned that the roll-out of broadband through the help scheme should not be done to the detriment of first and foremost resolving the inaccessibility of digital TV equipment for blind and partially sighted people. RNIB therefore suggests that money within the digital switchover Help Scheme should above all earmarked to enable voice

output for digital TV menus and EPGs before other developments such as return paths are incorporated.

RNIB also believes that the obligations regarding equipment accessibility (section 10 Communications Act) need to be strengthened, as the current duty on Ofcom to encourage manufacturers is not leading to significant tangible improvements.

ACTION 8

“We will examine how the marketing and communications activity around Digital Switchover could be enhanced to use the region-by-region programme of publicly funded information and advice on one form of digital transition to provide impartial information on wider opportunities of digital beyond digital broadcast television.”

RNIB welcomes this approach, but urges the government to ensure that messages about digital TV switchover are not confused with messages about other digital opportunities. We therefore suggest that the marketing and communications activity around digital switchover remains narrowly focused on TV until a region has gone digital, but that other digital transmissions can be promoted soon after a region as switched. In addition, communications on other digital transmissions such as digital radio and broadband, should be suitably adjusted to ensure that blind and partially sighted people and other disabled people are well informed to choose equipment and services that are most accessible and usable for them.

ACTION 9

“We will take action to support DAB digital radio in seven areas:

- a. We are making a clear statement of Government and policy commitment to enabling DAB to be a primary distribution network for radio;
- b. We will create a plan for digital migration of radio, which the Government intends to put in place once the following criteria have been met:
 - When 50% of radio listening is digital;
 - When national DAB coverage is comparable to FM coverage, and local DAB reaches 90% of population and all major roads.

- c. We will create a Digital Radio Delivery Group which includes the retailers, the Transmission Networks, the BBC, the Commercial Radio Companies, the Car Manufacturers, consumer representatives and the device manufacturers whose role would be to increase the attractiveness, availability and affordability of DAB and to advise on the Digital Migration Plan.”

RNIB welcomes the recognition that more work is needed on Digital Radio as outlined under action point 9. However we consider that the interim report fails to recognize the level of consumer resistance to a switch to digital radio. It also omits some specific consumer needs that must be addressed and a requirement for the same level of consumer involvement as that which is currently taking place in the switch to digital television. We ask the team to take more account of the report of the consumer impact group of the DRWG into the switch to digital radio.¹ RNIB as well as other organizations representing the more vulnerable consumers contributed to this report and its recommendations should not be ignored. In particular, RNIB wants to re-iterate:

1. The proposed migration criteria of 50% of all listening through digitally enabled devices is too low, and disproportionately affects disadvantaged groups who are less likely to be represented in the first 50% to take up digital radio. We would therefore like to see the 50% figure analysed in more detail and a stronger case made for it.
2. A help scheme will be essential to assist those where the cost of migration is significantly greater than the benefit.
3. The current consumer uses and preferences in radio receivers are not fully understood, particularly among the most vulnerable groups who are also those most dependant on radio. Before a switch to digital can begin research should be undertaken to examine the extent of ownership and usage of analogue and digital radio, particularly amongst disabled people, older people, people whose first language is not English and consumers from low income households.
4. We note that part of the role of the delivery group will be to *increase the attractiveness, availability and affordability of DAB*. This misses the concerns of expert consumer organisations such as RNIB who commissioned research into the design of sets. This research highlights

¹ http://www.culture.gov.uk/images/publications/Consumer_Impact_Group_Report_to_DRWG.pdf.

the needs of blind and partially sighted and the gaps in usability of equipment overall.²

5. We are concerned that consumers should have clear and impartial information on all equipment and a kite mark scheme that indicates usability as well as essential technical reliability should be provided.

“ACTION 17

We will develop plans for a digital Universal Service Commitment to be effective by 2012, delivered by a mixture of fixed and mobile, wired and wireless means. Subject to further study of the costs and benefits, we will set out our plans for the level of service which we believe should be universal. We anticipate this consideration will include options up to 2Mb/s.”

RNIB supports such a move. A universal service obligation for broadband and mobile is something RNIB has long called for. It is crucial that those furthest from these services are able to access them. By “access”, we do not just mean physically being able to get to a computer. For blind and partially sighted people, access to ICT requires that the hardware, network and accompanying information are all designed or adapted for people with sight loss. Websites must be navigable for people using text-to-speech screen readers, for instance. Help with setting up computers, and helplines for problem solving are also necessary to ensure that blind and partially sighted people have full access to ICT. It is also very important that the affordability of services is taken into account when trying to ensure their accessibility. Unless a service is affordable, it cannot be deemed accessible. Affordability is a particular concern for blind and partially sighted people, many of whom are among the poorest of the UK’s citizens.

“ACTION 19

We will encourage the development of public service champions of universal take-up. The Digital Inclusion Action Plan recommended the appointment of a Digital Inclusion Champion and expert taskforce to drive the Government’s work on digital inclusion. Clearly, the work of the Champion will be important in encouraging take-up.”

² Freeman, J., Lessiter, J. & Ferrari, E. (2009, February) Research report: [Are you really listening? The equipment needs of blind and partially sighted consumers for accessible and usable digital radio](#)

As mentioned above, RNIB has submitted comments to “Delivering Digital Inclusion: An Action Plan for Consultation”. (See annex below).

We welcome the fact that the Digital Britain Report says

“The Digital Britain team will work together with the Digital Inclusion team in Government and, when appointed, with the external Digital Champion to ensure that the Digital Britain project and the Digital Inclusion programme continue to be closely aligned.”

We urge the government to ensure that disabled peoples’ organisations will be an intrinsic part of this work.

In our response to “Delivering Digital Inclusion: An Action Plan for Consultation”, we questioned whether the envisaged role of the Digital Champion would be ambitious enough given the scale of the challenge ahead. We maintain that the powers and influence of the Digital Champion certainly need to extend further than those enjoyed by the former e-Envoy.

We accepted that a Digital Inclusion Champion and a Charter for Digital Inclusion are good ideas, but said that for blind and partially sighted people progress depends on the UK Government taking action which will ensure that the digital environment in the UK is fully accessible to blind and partially sighted people. This means that the issue of equipment accessibility has to be tackled. Too often inaccessible equipment, that assumes that the user can read on-screen information without providing a voiced alternative is the main barrier to uptake of services by blind and partially sighted people. For example, recent research by i2 media research, looked at how accessible the functional and design features of digital radios are for blind and partially sighted people, people with dexterity problems or dyslexia. The results show that 90 percent of blind and partially sighted people using a digital radio without voice output need help the first time they use their radios. 70 percent continue to need support for subsequent use, whereas this figure is less than 20 percent in the general population and voice output gives blind and partially sighted people a level playing field!³

RNIB believes a Digital Inclusion Champion can play an effective role in championing improved public procurement processes, working with the Office for Government Commerce, BERR, the Government Equalities Office and other relevant agencies to produce revised guidance

³ Freeman, J., Lessiter, J. & Ferrari, E. (2009, February) Research report: [Are you really listening? The equipment needs of blind and partially sighted consumers for accessible and usable digital radio](#)

applicable across the public sector. For instance one of the most effective things they could do would be to promote the recognition of social criteria in public procurement processes.

We believe that the Digital Inclusion Champion should have an advisory panel that they can regularly refer to, and have a role in demystifying digital technologies and facilitating dialogue between users (and potential users) of technologies and service providers.

“ACTION 21

A Public Service Delivery plan: we commit to ensure that public services online are designed for ease of use by the widest range of citizens taking advantage of the widespread uptake of broadband to offer an improved customer experience and encourage the shift to online channels in delivery and service support.”

This is extremely important for blind and partially sighted people. More and more services are being delivered online, which makes access to websites more vital than ever for all citizens. Many disabled people rely even more on public services than their non-disabled peers, for a variety of reasons. A blind person might well have greater difficulty in visiting their council, for instance, and would therefore benefit greatly from being able to access the council’s website. However, a recent EU wide survey found that only some 5% of public websites are accessible. RNIB therefore urges the government to take urgent action to improve the accessibility of public websites.

The Digital Britain Report says that Action 21

“will include working with industry to develop affordable, reliable and easy-to-use IPTV boxes”

RNIB urges the government to work with organisations such as RNIB on such initiatives, so that accessibility can be ensured from the projects’ inception. We would also like to see the statutory requirement to provide audio description extended to delivery of TV over the internet, given that this technology will in all probability gradually become a more prevalent means of viewing TV over the coming years, and that people with sight problems need audio description whichever platform they use to watch TV.

ACTION 22

“The current statutory and specific remit on media literacy is contained

within s.11 of the Communications Act 2003. As this report makes clear, since 2003 there have been significant market changes in the availability of digital technologies and how they are used. We will ask Ofcom to make an assessment of its current responsibilities in relation to media literacy and, working with the BBC and others, to recommend a new definition and ambition for a National Media Literacy Plan.”

RNIB believes Ofcom’s obligations regarding media literacy need to be strengthened to ensure that blind and partially sighted people are able to consume and create content like anyone else.

About RNIB

We are a membership organisation with over 10,000 members who are blind, partially sighted or the friends and family of people with sight loss. 80 per cent of our Trustees and Assembly Members are blind or partially sighted. We encourage members to be involved in our work and regularly consult with them on government policy and their ideas for change.

We provide expert knowledge to business and the public sector through consultancy on improving the accessibility of the built environment, technology, products and services.

Dan Pescod

RNIB March 2009

ANNEX

Delivering Digital Inclusion: An Action Plan for Consultation (Department for Communities and Local Government)

Response from Royal National Institute of Blind People (RNIB)

1. Introduction

1.1 The Royal National Institute of Blind People (RNIB) welcomes this opportunity to comment on an extremely important set of issues. Our submission is based on one fundamental point, which is that blind and partially sighted people experience shocking levels of digital exclusion. Our submission should be read alongside the response produced by Share the Vision (STV) the UK network which brings together the voluntary and public sectors to improve library services for blind and partially sighted people.

1.2 With the advent of new information and communication technology (ICT), the potential to access information is unparalleled. Regrettably a number of significant barriers to accessing these technologies remain. Blind and partially sighted people face particularly severe obstacles, impacting on their use and enjoyment of digital technologies.

1.3 Addressing the e-accessibility 'deficit' that currently exists across Europe:

- Only a very small proportion of key government websites in European Union Member States meet the accepted minimum international standards on accessibility (only 5.3% pass automatic and manual examination).
- The share of key commercial sectoral web sites (e.g. railways, TV, newspapers, retail banking) providing this minimum level of accessibility is even lower (only 3.9% passed automated testing while not a single site passed both automatic and manual testing).
- On average only 8% of all ATMs that have been installed by the two main retail banks in the EU Member States provide 'talking output', which enables self-service for customers with visual impairment. The bulk of this is provided in just a few countries.

1.4 These examples only just hint at the levels of digital exclusion blind and partially sighted people currently experience. The quantity and range of goods, services and information provided by digital means have rapidly increased over the last few years. This digital revolution is growing, meaning that ever-greater aspects of everyday life require access to ICT.

1.5 The rapid pace of technological development means that both hardware and software change very quickly. It is important to distinguish between specialist technologies designed specifically to aid blind and partially sighted people, and general technological developments designed for use by everyone. Invariably technologies require some form of modification or special access software to be purchased in order that blind and partially sighted people can use them meaningfully. With digital devices and applications becoming ever more complex and in some cases more costly, the risk of a digital "deficit" opening up only increases.

2. Digital exclusion of blind and partially sighted people

2.1 Using information and communication technology (ICT), digital TV, digital radio and mobile phones has become a key skill for everyday living, enabling access to services, products and leisure opportunities as well as education and employment. These technologies have the

potential to be very empowering, further improving independence, but this depends on both every sector taking the right steps to tackle digital exclusion.

2.2 In theory blind and partially sighted people should achieve similar levels of access to websites and email to that enjoyed by everyone else thanks to screen reader and magnification software aids. In reality large numbers of blind and partially sighted people are unable to benefit from accessing these and other digital technologies. Many are unable to access mainstream technologies or afford the substantial extra costs of special access technology. Another key issue affecting blind and partially sighted people's access to ICT and mobile technologies is the confidence, skills or training they can rely on to use these services in a different way to their sighted family, friends and neighbours.

2.3 Information on new technologies needs to be provided in a comprehensible and timely fashion. Blind and partially sighted people need to know what is available; they need to be able to get sufficient information to assess its suitability to their situation and they need to know where to get it. But all too often blind and partially sighted people have low levels of awareness of the technologies available to people with sight loss.

2.4 Recent studies provide us with clear insights on blind and partially sighted individuals' use of personal computers and mobile phones⁴. 44% of people surveyed by Guide Dogs report using a personal computer, but there is a clear demand for further use. 55% use a mobile phone, but for non-users a key limiting barrier is the numbers on the keys or information presented on the screen. In many cases blind and partially sighted individuals are unaware that adaptations are available that make both these things more accessible.

2.5 For ICT to be accessible to blind and partially sighted people, they must be affordable. A mobile phone, for instance, which has voice output

⁴ See 'Functionality and the Needs of Blind and Partially Sighted Adults in the UK: A Survey'. Guide Dogs (2007), Chapter 8. Also useful is 'Network 1000. Opinions and circumstances of visually impaired people in Great Britain: report based on over 1000 interviews'. VICTAR (August 2006).

but which costs three times more than its equivalent without such functionality, cannot be said to be "accessible". If a user cannot afford to use a product or service, it is not accessible to them. At present community equipment budgets provided through local authorities fail to cover the costs of purchasing special access technologies.

2.6 RNIB believes government leadership is absolutely vital at this time. Our key recommendations as DCLG comes to finalise Government's Action Plan are as follows:

The public sector should play a much more positive role, using its significant purchasing powers to procure accessible technologies.

Accessibility provisions must be built in to new public sector IT projects such as the NHS Connecting for Health and Jobcentre Plus Job Point kiosks from the outset.

Government should provide grant funding so that community and other voluntary sector organisations can work with excluded groups to instil confidence and provide accessible training in the use of digital technologies.

Government should consider the development of quality standards on accessible technologies in the public sector. In this way the Digital Inclusion Champion can play an effective role securing cross-governmental support for improvements envisaged by Articles 9 and 21 in the UN Convention on the Rights of Persons with Disabilities.

The Digital Inclusion Champion can play an effective role in championing improved public procurement processes, prioritising recognition of social criteria.

3. The case for prioritising digital inclusion

3.1 The European Commission-sponsored study 'Measuring the Progress of e-Accessibility in Europe' (November 2007) shows that there is only limited progress towards e-accessibility. The e-Accessibility 'deficit' means people with disabilities continue to be confronted with significant barriers to usage of everyday ICT products and services that

are now considered "essential elements of social and economic life"⁵. The e-Accessibility 'gap' suggests urgent collective action needs to be taken across European Union member-states. Comparative studies highlight that e-Accessibility policy compares very unfavourably with policy in Australia, Canada and the United States.

3.2 There are quantifiable benefits for the broader economy simply from getting individuals to be digitally engaged. RNIB is pleased the consultation document references the UK Online Centres report, which estimates that UK Gross Domestic Product (GDP) could increase by 1.14 to 1.54 per cent between 2008-2010 due to public spending on e-government and digital literacy programmes. Providing information electronically can have a significant impact on efficiency, as UK Online Centres' report suggests. However, we must emphasise that for cost savings to be realised, information that is provided electronically must be fully accessible, otherwise planned savings in the form of fewer face-to-face consultations and complaints procedures won't prove realistic.

3.3 A radical improvement in the accessibility of the digital world to disabled people is also required in order to meet the EU's I2010 Strategy. This strategy calls for, among other things, attention to be paid to "eAccessibility". It should be remembered that the overarching aim of the 2010 Strategy is to improve the competitiveness of the EU's economy. There could surely be no better time for working on that objective.

3.4 Designing technologies and then delivering services inclusively should benefit manufacturers and service providers. Research carried out by Microsoft and Forrester Research in 2003 suggested that up to 60 per cent of the working age population would be likely to benefit from accessible technologies because of minor disabilities or other usability difficulties.⁶

⁵ 'Status of e-Accessibility in Europe' (European Commission webpage, posted November 15th 2007). http://ec.europa.eu/information_society/newsroom/cf/itemdetail.cfm?item_id=4280

⁶ Microsoft/Forrester Research, Inc. (2003) 'The Market for Accessible Technology—The Wide Range of Abilities and Its Impact on Computer Use' available at <http://www.microsoft.com/enable/research/phase1.aspx>

3.5 The Digital Inclusion Action Plan needs to be informed by the July 2008 Ofcom research report, 'People with visual impairments and communications services'. Ofcom provide a number of useful insights explaining that a wide range of factors influence blind and partially sighted people's experience and attitudes to communication services. The research points out blind and partially sighted consumers tend to have low expectations of service providers and that difficulties in accessing specialist technologies are compounded by the fact that large numbers live on a low income. Age is another significant factor influencing expectations of access to communication services, but there is clearly great potential for older individuals to embrace digital technologies.

3.6 The Demos report, 'Web I'm 64' is another useful source of evidence⁷. Taking the Internet as its focus, the think tank argued that its expansion had distributed itself unevenly across the generations. It references research undertaken by the Digital Inclusion Panel projecting only a modest reduction in the proportion of adults who are digitally excluded between 2005 and 2015. Even if full digital engagement isn't quite the goal Government aspires to, there is clearly a long way to go if digital take-up is to increase in line with expectations. For blind and partially sighted people, the issue of take-up is complex since disengagement is so multi-faceted.

4. Tackling barriers to engaging in digital technologies

4.1 The main barrier preventing blind and partially sighted people from engaging in digital technologies is inaccessible design and poorly conceived user interface. A lot of the web remains inaccessible, especially a new generation of interactive and social networking websites. PDF documents are often poorly "tagged" and digital TV electronic programme guides are inaccessible because no system currently provides voice output.

⁷ 'Web I'm 64. Ageing, the internet and digital inclusion'. Demos (2007). <http://www.demos.co.uk/projects/webim64/overview>

4.2 E-books have the potential to bring a far wider range of titles to blind and partially sighted people. Blind and partially sighted people read these books using text-to-speech synthetic voice output. However research carried out in 2004 shows that only 5% of books are available in accessible formats, such as an e-book. Even where books are available in alternative formats difficulties in accessing these can arise as a result of problems experienced with websites, software and hardware and digital rights management.

4.3 In fact RNIB's view is that the other barriers set out in Chapter 3 of the consultation document, including individual lack of confidence and fear of using new technologies, tend to arise as a result of so-called "design inequalities". As a category "lack of skills" doesn't adequately capture the full range of problems that blind and partially sighted individuals experience, since it is not always skills they are lacking in, but a meaningful choice of accessible and reasonably priced technologies.

4.4 A lack of skills can be a problem, however. Generic training courses are often reliant on graphical user interfaces. Trainers on these courses are unfamiliar with access technology systems and are therefore unable to offer adequate support to a person with sight loss. This is especially true of the majority of courses provided in colleges and public libraries, with most staff having little if no experience of assistive technologies.

4.5 RNIB Cymru's Accessible Technologies in Communities (ATIC) Project has provided us with some insights on the barriers that prevent individuals with sight loss from experiencing the benefits of computers. Blind and partially sighted people are often unaware of the benefits computers can offer assuming that no suitable technology will be available to them. Where individuals with sight loss do wish to improve their skills access to appropriate training becomes an issue. So it is not always realistic to expect individuals to attend group-taught classes in colleges or training centres. An Ofcom Report has also identified that many people are more comfortable learning about new technology in less formal settings, often with the support of family and friends and in their community for example.

4.6 The Accessible Training in Communities (ATIC) project was designed with these precise considerations in mind. The idea was to help build up individuals' confidence in the use of ICT in an environment that was comfortable and known to them. It is this same thinking which helped inspire the Department for Children, School and Families' Home Access Project and the Gateway project in public libraries. The Gateway project is focused on opening up access to books, reading and libraries for anyone with sight loss. Public libraries provide a Helpdesk - a single contact point for visually impaired people and staff who support them - for enquiries about the whole range of library services, reading materials and useful technology. Notwithstanding this, RNIB believes good practice still remains concentrated in too few pockets. The lead the Welsh Assembly has taken in funding ATIC is an example other administrations, including the UK Government, can learn from.

Qualitative evidence

4.7 Below we set out the problems blind and partially sighted people encounter by looking at qualitative evidence collected as part of Guide Dogs' functionality and needs' survey.⁸ This research reveals that for many blind and partially sighted people, the key barriers preventing engagement in digital technologies are poor design and prohibitive cost:

'There needs to be more accessibility for the Internet as many web pages are not accessible for the blind' (48-year old man from England registered blind for 6 years).

'The cost of technologies for blind people is crazy, they are all too expensive. If a person could afford those things it would be great because of all the independence it would give you' (62-year old man from Scotland registered blind for 62 years).

4.8 Awareness of technologies that are available, perceptions about their relevance to a blind or partially sighted individual's life and levels of

⁸ 'Functionality and the Needs of Blind and Partially Sighted Adults in the UK: A Survey'. Guide Dogs (2007), Chapter 8.

knowledge about adaptations that can readily be made all have an effect on potential use of digital technologies:

'I've never used one (a computer) since losing sight. If people are blind how do they see the screen? Would the keys be raised or Braille labels on the letters?' (67-year old woman from England registered blind for 14 years).

'What I really need is advice on what's out there. I don't know if the things I think I need exist and I don't know what to ask for' (77-year old woman from England registered blind within the last year).

4.9 However, a number of respondents to Guide Dogs' survey indicate blind and partially sighted individuals would happily engage with digital technologies if only greater support and training were available:

'Computers open up another world for the blind and partially-sighted, they are great... as long as we can be taught how to use them' (63-year old woman from Wales who has had an eye condition since birth).

'Until I had training I didn't know that on regular computers you could alter the colour contrast, speed and icon size – now mine are set to four times the size' (52 year old woman from England registered partially-sighted for 2 years).

4.10 Indeed, many blind and partially sighted individuals are eager to learn more about digital technologies:

'I'd like to build my own website, a review site for visually disabled people to rate aspects of accommodation for the blind' (57-year old woman from England registered partially-sighted for 5 years).

Digital Television

4.11 Inaccessible digital TV equipment and the limited provision of audio description inhibit the media literacy of blind and partially sighted people. Ofcom's website says: "a media literate person should be able to, for instance, use an electronic programme guide (EPG) to find the programme they want to watch. They may interact with the programme using interactive features or by telephone."

4.12 Blind and partially sighted people have long been frustrated at the inaccessibility of digital television where the interface requires the user to be able to see menus and programme information on the television screen. RNIB's research found that the best solution is to provide voice output of on-screen menus and EPGs. RNIB is aware of the initiatives Ofcom has taken in the area of media literacy. However these have not led to the mainstream market delivering products with voice output for menus or EPGs. RNIB has responded to this failure by the market by committing to develop accessible equipment itself. Clearly we do not wish this to be available as a specialist niche market product only and have asked Ofcom to promote the technology to both manufacturers and retailers to ensure it gets implemented by the digital TV market at large.

4.13 Blind and partially sighted people are often unable to fully follow a programme when it is not audio described. Audio Description (AD) is like a narrator telling a story, an additional commentary describing body language, expressions and movements, making the story clear through sound. It describes what a blind or partially sighted person might otherwise miss and is only available on digital television.

4.14 Ofcom's own research found that "nearly all users of audio description (AD) feel that using the service improves their understanding and enjoyment of TV programmes". We therefore believe that Ofcom can and should deliver on its duty to promote media literacy by recommending that the Government increase the target of programmes available with audio description from 10 to 20 per cent.

5. Public Sector

5.1 RNIB and other voluntary organisations will always have a role to play in developing "exemplar" technologies and services, designed for specific groups of individuals. In this way we are committed to projects such as ATIC. But in the main blind and partially sighted people use technologies purchased and delivered by the public and private sectors, and all too often these remain inaccessible. That is why Government leadership is so vital if the existing divide is not to widen further still. The public sector should play a much more positive role, using its significant purchasing powers to procure accessible technologies.

5.2 RNIB is concerned that a number of high-profile public sector IT projects have appeared to treat accessibility as an 'after-thought' or secondary matter, behind considerations related to cost and efficiency. It is crucial that accessibility gets "designed-in" whenever new policies and products are first conceived.

5.3 Jobcentre Plus is just one example of a public authority providing services which blind and partially sighted customers cannot use or access. The current Jobpoint kiosks intended to assist with customer job search are not fully compliant with the Disability Discrimination Act. Due to the lack of a keyboard and other input capabilities its accessibility and usability cannot be improved. This is disappointing since Government welfare policy no longer exempts blind and partially sighted from the requirement to seek work. On a positive note the Department for Work and Pensions' first equality scheme action plan included a commitment to:

“undertake a stock take and assessment of flexibility for all our computer systems that interface with customers, for example Jobpoints that provide an interactive vacancy search facility which may not be fully accessible to customers with visual impairments”.

Jobcentre Plus is currently in the process of procuring a new set of Jobpoint kiosks. RNIB has been in dialogue with DWP officials on the accessibility requirements of blind and partially sighted customers for six years. We are impressing upon them that these need to be taken into

account in any decision-making process on the next generation of computer terminals established in Jobcentre Plus locations. However, the Disability Equality Duty has been in place since 2006 and in 2009 we remain concerned that DWP fully understands its obligations under the law.

5.4 In recent months RNIB has strongly advocated that accessibility provisions must be built in to the new NHS Care Record Service from the outset. In fact we have called on the Department of Health to guarantee that its National Programme for IT (or 'Connecting for Health') will deliver full equality of access to information for blind and partially sighted people, in line with its obligations under Disability Discrimination law. For all the advantages that NHS Choices and an electronic 'Touch and Book' system may bring, blind and partially sighted people remain unlikely to benefit from these innovations as long as public information remains inaccessible. Unless carefully managed, the implementation of new informatics can all too easily create new barriers of access to blind and partially sighted patients. In the case of technologies rolled out for use in the NHS it makes it difficult or impossible for them to manage their own health. Ultimately this may impact on the achievement of certain Government objectives such as reducing health inequalities.

5.5 Our experience of the NHS Care Record Service so far is that the design of new ICT contains no guarantees that it will be usable to many blind and partially sighted users, and in fact it could fail to meet their information needs. For example, we have learnt that the provisions to enable blind and partially sighted people to negotiate the critical log in process in order to gain access to HealthSpace on the new NHS Choices website appears to be inadequate despite the service being actively piloted in parts of England.

5.6 RNIB also notes with concern the rapid rollout of "touch screen" public information terminals, especially in major railway stations. Self-service terminals are also increasingly common in public libraries. Although a large number of factors help to drive digital exclusion, it is easy to overlook the causal relationship between the design limitations of any given technology and its potential exploitation by disabled people. "Touch screen" technologies have quickly superseded other forms of digital technology, and the apparent lack of universal standards

governing their design can make it even more difficult for blind and partially sighted people to carry out everyday tasks like paying for rail tickets.

5.7 The consultation document discusses the need to remove barriers so that "all individuals can exercise an empowered choice about their use of digital technologies". What this rather overlooks is that to make an empowered choice individuals at the very least need to be able to access any digital technologies on offer. If the only technologies public and private sector service providers make available are based on current "touch screen" technology, its disabling user interface will mean certain individuals are disempowered from making any choice at all.

6. Risk factors and benefits associated with next generation access

6.1 The same barriers identified in Section 4 above will need to be removed if blind and partially sighted people are to engage with next generation access technologies. Service providers will need to remain outcome-focused when procuring and encouraging the development of new technologies. If blind and partially sighted people are failing to engage with digital technologies now, there is a danger they will find it even more difficult to take up technologies when digitised content increasingly appears on converged devices.

6.2 This is not to overlook the potential benefits associated with next generation access. The rollout of digital television by 2012 should mean increased educational opportunities, RFID tags could mean quicker payment options for certain services and smartphones could conceivably lead to advances in public transport ticketing and arrangement of GP appointments. But as the benefit to the general population of these new services and systems increase, so the disenfranchisement of those who are unable to access them increases too. A concerted and wide-ranging effort is therefore required to ensure that blind, partially sighted and other disabled people can access these services.

7. Government's role

7.1 The Government has a very significant role to play in delivering digital inclusion. It can make a number of interventions, not least through providing grant funding so that community and other voluntary sector organisations can work with excluded groups to instil confidence in the use of digital technologies. Without Government and the public sector taking the lead it falls to voluntary sector organisations to tackle the "digital divide" but there is only so much they can achieve on their own.

7.2 A Digital Inclusion Champion and a Charter for Digital Inclusion are good ideas, but for blind and partially sighted people progress depends on the UK Government taking action which will ensure that the digital environment in the UK is fully accessible to blind and partially sighted people. This might well mean developing quality standards on accessible technologies for use in the public sector. This is clearly no small objective but there is the danger that unless they tackle some of the major challenges around digital exclusion a new Champion will come to be seen as tokenistic. Although the list of responsibilities outlined in the consultation document is impressive, RNIB questions whether the envisaged role is ambitious enough given the scale of the challenge ahead. Their powers and influence certainly need to extend further than those enjoyed by the former e-Envoy.

7.3 RNIB considers Articles 9 and 21 in the UN Convention on the Rights of Persons with Disabilities a useful framework that could drive forward future Government action on improving access to ICT. Long-term legislation affecting UK citizens' access to electronic and information technology procured by the Government should be based on accessibility standards similar to those in Section 508 of the United States' Rehabilitation Act.

7.4 RNIB believes a Digital Inclusion Champion can play an effective role in championing improved public procurement processes, working with the Office for Government Commerce, BERR, the Government Equalities Office and other relevant agencies to produce revised guidance

applicable across the public sector. For instance one of the most effective things they could do would be to promote the recognition of social criteria in public procurement processes.

7.5 As well as working with an expert taskforce and research team the Digital Inclusion Champion should have an advisory panel that they can regularly refer to. At the very least the expert taskforce should be widely representative and include disabled consumers of digital technologies. Ideally an advisory panel would provide Government with a set of "experts by experience" who can advise on policies and measures that help foster digital inclusion and break down barriers to accessing new technologies.

7.6 Finally the Digital Inclusion Champion should have a role in demystifying digital technologies and facilitating dialogue between users (and potential users) of technologies and service providers.

January 2009