DigitalUK

2020 EPG Accessibility Statement

2nd December 2020

1. Introduction

About Digital UK

1.1   Digital UK leads development of Freeview, the nation's most widely used television platform. Our goal is to create the best free TV service, both live and on-demand.

1.2   We are responsible for day-to-day operational management, including the Freeview electronic programme guide, and lead on developing platform strategy, working with our broadcast partners and industry.

1.3   In September 2015 Digital UK and Freeview launched 'Freeview Play', the new connected TV service which seamlessly delivers on-demand content alongside linear broadcast channels.

1.4   Digital UK holds two Ofcom EPG provider licences: a DTAS licence which covers service information (EPG data) that is broadcast via DTT, and a complementary TLCS licence for the enhanced service information delivered over IP for Freeview Play receivers.

1.5   Digital UK is owned by the BBC, ITV, Channel 4 and Arqiva.

Background to Statement

1.6   Freeview is a universally available service offering a range of more than a hundred free-to-air TV, radio and text-based services. It can be found in over 17.5 million homes and is the primary broadcast television service in more than 10 million homes.

1.7   As such, Freeview aims to cater for the widest possible range of audience requirements, and Digital UK and Freeview are committed to delivering improvements in the accessibility of Freeview products and services every year. This is done in collaboration with our partners. These include manufacturers of Freeview receivers, content providers who make their channels and services available to our audiences, and increasingly third-party operating system (OS) providers to whom manufacturers may choose to outsource UI design.

1.8   Digital UK and Freeview operate within a horizontal market. We define product operating rules for Freeview and Freeview Play devices; however, we do not have direct control of receivers. Manufacturers of Freeview Play devices own the development of their native UIs, including EPGs, with Digital UK aiming to drive improvements through careful cooperation and engagement with our partners.

2. Executive Summary

2.1 Digital UK and Freeview firmly believe in the need to provide UK viewers with fit-for-purpose, accessible TV. We welcomed Ofcom's amendments to the EPG Code in 2018 and have been committed to delivering these in a way that offers maximum benefit to the viewer, as we set out in our 2019 report.

2.2 Following a short pause in development at the start of the Coronavirus pandemic, we have continued to develop the Accessible TV Guide (ATVG) solution outlined in our 2019 statement. We are pleased to have successfully launched it on 50% of Freeview Play devices on 28th October 2020.

2.3 We aim to roll-out to remaining devices over the next 8 months and currently expect the service to be available on more than 13.5 million of the Freeview Play TVs and set-top boxes that will have been sold by the end of Q2 2021. We anticipate c.5 million of these will be already connected and have immediate access to the ATVG. The full list of compatible devices at time of launch can be found in Annex A, and a live list at www.freeview.co.uk/help/accessible-tv-guide.

2.4 The Accessible TV Guide can be found at channel number 555. It is a separate, additional guide to the standard linear EPG and has been developed with accessibility needs in mind from the outset.

2.5 The ATVG fully complies with all four priority accessibility requirements outlined in the EPG code (magnification, filtering, high contrast and text-to-speech), and we have worked in close collaboration with accessibility user groups such as RNIB, DAC and AbilityNet throughout development to ensure it is effective in each of these areas.

2.6 Once roll-out is complete, we will look to further enhance the ATVG service through the inclusion of on-demand content, and to refine accessibility options based on user feedback.

2.7 Separately, we have continued to encourage our device partners to include accessibility features in the native user-interface (UI) of devices via our product requirements document. However, as we explained in our 2019 statement, we do not own the native UIs of Freeview Play devices. As a result, we cannot guarantee that these features will be implemented, and have found that the impact of this approach has been limited.

2.8 Looking ahead, we therefore believe the ATVG is a suitable alternative measure to the approach described in paragraph 2.7, offering equally effective outcomes. Not only that, but we believe it is the best way for Digital UK to provide accessible EPG services to our viewers going forward. It provides an improved user experience and increased reach; it allows us the control to make incremental and immediate improvements; it also mitigates the impact of over-reliance on third parties at a time with significant economic and global pressures.

2.9 We will therefore focus our resource primarily on supporting and enhancing the ATVG service as the means of fulfilling our commitment to deliver accessible EPG services to viewers.

2.10 In addition to this, we will continue to support accessibility across all our customer touchpoints and have accessibility support built into our web, mobile and customer support channels.

3. Accessible TV Guide Overview

What is the Accessible TV Guide?

3.1   In response to Ofcom's amendments to the EPG code, Digital UK have developed an accessible EPG solution that we call the "Accessible TV Guide" (ATVG); a separate, additional guide to the standard linear EPG, designed in collaboration with accessibility groups specifically for those with accessibility needs.

3.2   The ATVG is an application built using HbbTV technology, but to viewers with a connected Freeview Play TV or set top box, it will appear simply as an additional channel, accessed via keying 555 on a remote control.

3.3   Following a public consultation, channel number 555 was chosen due to there often being a raised node on the number 5 button of remote controls, further increasing accessibility for those with visual impairment. It is also simple to remember and promote, and is an existing button on all remote controls, therefore ensuring the solution also works on compatible legacy devices.

Launch & Roll-out

3.4   The coronavirus pandemic placed resourcing constraints on our business due to a need to prioritise platform stability. Despite this, and the significant impact of a sudden change to remote working, the Accessible TV Guide was successfully launched on Wednesday 28th October 2020 across 50% of the Freeview Play device base (see Annex A for complete list of models).

3.5   We aim to roll-out the ATVG to the remaining Freeview Play devices over the next 8 months. These will be prioritised based on technical feasibility and market share. At roll-out completion, it will be available on the 13.5 million Freeview Play TVs and set-top boxes in the market by the end of Q2 2021; c.5 million we estimate will be already connected to the internet and will have immediate access to the ATVG.

3.6   Consumers who do not currently have a Freeview Play device, but wish to benefit from the ATVG service, can find devices available from £80 (See Annex A for full list of compatible devices). These can be easily identified across different brand names by looking for the Freeview Play logo.

Accessible TV Guide Feature Detail

3.7   The ATVG provides the four accessibility features identified in the EPG code in the following ways (see Annex B for visuals):

   i.   **Magnification**

   - The ATVG displays text content 2 times the size of normal text presentation. This can be up to 48pt font size on a normal HD (720p) resolution TV, and 33% larger than this on Full HD models (1080p). Therefore, if viewers wish to magnify text on the traditional EPG listing, they can switch to the EPG on Channel 555 to see the text enlarged.

   ii. **High Contrast Display**

   - As per the guidance set out in Ofcom's statement on EPG Accessibility, the ATVG has a 7:1 contrast ratio as a minimum, with many areas displaying an even higher contrast following engagement and feedback with users during the design review stage.

- It also has a simple UI which avoids elements with aesthetic value only, to allow for easier navigation using the arrow buttons on a remote control.

   iii. **Highlighting and Filtering**

- On first use of the ATVG, users are invited to set their accessibility preferences. This includes setting up Text-to-Speech and options to only show programmes with audio description, subtitles and/or sign language.

- The ATVG will remember these settings when returning to the guide, and users are able to easily access "Settings" to change their accessibility preferences at any time.

   iv. **Text-to-Speech (TTS)**

- The ATVG TTS system is designed to provide natural and contextual aural cues as users navigate the service. Rather than reading everything on screen as many TTS implementations do, it reads specific elements to aid the navigation and discovery of programmes consistently through the User Interface (UI).

- On first use of the ATVG, TTS will automatically be active on the accessibility preferences page to allow users to easily turn the feature on for future use. For those who do not want this feature, TTS will automatically stop after this step unless the user actively chooses to turn it on.

- The TTS experience can be further adapted to suit a user's needs by changing the gender of voice or speed; the latter allowing for varying levels of experience using TTS software.

User Engagement and Feedback

3.8   We strongly believe that user engagement in the design, development and launch of a service such as the Accessible TV Guide is essential to its success. As such, we have engaged with a number of agencies and advocacy groups throughout the ATVG's development process:

   i. **AbilityNet** supported a round of user testing at the end of 2019 leading to several developments such as higher contrast UI in certain areas, better TTS functionality, and an introductory YouTube video for users looking for support when setting up.

   ii. The **Digital Accessibility Centre (DAC)** provided feedback on the initial concept and designs, the TTS engine, the effectiveness of the support video and have been a close partner throughout the development period.

   iii. **RNIB** received multiple demos throughout development and provided useful feedback on core features such as the addition of TTS increased speed settings for more experienced TTS users.

   iv. **Scope, RNID** and Ofcom's **Communications Consumer Panel** received demos of the ATVG and an opportunity to feedback on the overall experience and key features.

3.9   Response to the ATVG from these groups has been overwhelmingly positive and many have provided public testimonials to this effect.

3.10   We are committed to continuing the high level of user group engagement as we complete roll-out of the service, and as we incorporate additional features in the future.

3.11   We have also opened a feedback loop with consumers at home, who can go to www.freeview.co.uk/555feedback to leave their comments.

Future Developments

3.12   Following roll-out completion of the linear accessible EPG, we will look to enhance the ATVG services to also include On-Demand content via menus for "Recommended" and "Recent".

3.13   We will also work to refine core features such as TTS following further user feedback and explore incorporating additional accessibility features such as audio feedback enhancements and different colour modes / stylesheets to reflect the needs of varying visual impairments.

4. EPG Accessibility on Freeview Native Device UIs (Traditional EPG)

Manufacturer Compliance Update

4.1   As highlighted in our prior submissions, a number of manufacturer partners already deliver some accessibility features on existing Freeview Play device models. However, conformance varies across manufacturers.

4.2   Digital UK continues to include accessibility requirements in its requirements document for Freeview Play (in the Product Overview Document or POD) and is encouraging manufacturer partners to adhere to these guidelines wherever possible.

4.3   However, as we do not own the native UIs of FVP devices, we cannot guarantee the implementation of these features and the impact of the new POD requirements has been limited.

Benefits of the ATVG as an Alternative Measure

4.4   We believe the ATVG to not only be a suitable alternative measure to native UI developments, offering equally effective outcomes, but the best way for Digital UK to provide accessible EPG services to our viewers. This is due to the following:

    i.   **Improved user experience** through the provision of a separate guide designed specifically for those with accessibility needs from the outset.

- By designing something new, it has allowed us to focus on not just the *provision* of accessibility features to comply with the EPG code, but to ensure the experience and usability of these features is the best it can be.

- Overlaying new features on existing systems can create an unsatisfactory user experience as the guidelines for the core design are already in place and complex to alter. Our manufacturer partners have voiced these concerns and recognise the benefits of directing users to a guide which is purpose built for their needs.

    ii.   **Increased reach** as it will be available on legacy connected Freeview Play devices, not just new ones.

- As the ATVG will be an application delivered via online connectivity, the functionality will be available regardless of the age of Freeview Play device. Native UI implementations will in most cases be specific to new

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       models, therefore requiring a new device to benefit from additional features. This will unfairly disadvantage those unable to purchase a new device.

iii.   It allows Digital UK **full control to make incremental, and immediately available, improvements** to the experience on both existing and new devices

- Ongoing refinements will be made to the ATVG post launch to ensure the service remains fit-for-purpose and valuable to our viewers. As updates will also be immediately available to those with connected Freeview Play devices, this provides us with the flexibility to make incremental improvements where required.

iv.   It **mitigates the impact of over-reliance on third parties** such as manufacturer partners, whose UIs we have only limited influence over and who may be subject to broader global and economic pressures.

- As highlighted, although we define product operating rules for Freeview Play devices, we do not have direct control of receivers and cannot guarantee the implementation of features in third party devices. As many of these organisations are global, UK specific customisations are particularly difficult to negotiate.

- Operating separately to third parties allows us freedom from the fixed software and hardware update cycles of manufacturers and allows for the incremental improvements outlined above.

- The ATVG also allows us to offer a consistent service and experience to all viewers with a connected Freeview Play device, irrespective of business negotiations.

4.5   These benefits make the ATVG the preferred solution for viewers on devices connected to the internet. Native UI improvements then offer only additional value on unconnected devices. However, TTS features are complex to implement and generally not supported if a device is not connected to the internet. The exception is high-end devices; but these are more likely to be purchased by someone already connected to the internet. Therefore, the benefit of native UI improvements on unconnected devices is limited.

4.6   As a result of these factors, and following the successful launch of the Accessible TV Guide, we will now focus our resource primarily on supporting and enhancing the ATVG service as the primary means of fulfilling our commitment to deliver accessible EPG services to our viewers.

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5. Additional Commitments to Accessibility

Content Provider Engagement

5.1   The success of the ATVG, and / or any other method of delivering the highlighting or filtering feature specifically, depends on accessible content, and its associated metadata, being made available by content providers.

5.2   We have therefore worked closely with content provider partners to raise awareness of this throughout development and launch and will continue to identify gaps in access service metadata as the service rolls out.

Accessibility across all Customer Touchpoints

5.3   We aim to provide our viewers with accessible services across all Freeview customer touchpoints, regardless of how they choose to engage with us or watch TV:

     i.   Our website takes best practice web accessibility guidelines into account, including the Web Content Accessibility Guidelines 2.1 standard. It also features an online EPG which offers the user a choice of accessible, list, and regular grid views. Our accessibility statement outlines details of the steps we take to ensure our website is available to all users.

     ii.   The Freeview mobile app is fully compatible with Apple and Android in-built accessibility functionality including magnification, high contrast display and "dark mode" (an alternative UI style recognised as a better experience for those with visual impairments). Freeview app specific icons and user experience are in-line with Apple accessibility guidelines, and the mobile TV guide can become a talking EPG if the user switches on iOS Voice Over or Android TalkBack.

     iii.   Our support services function across multiple channels depending on user preference or need: Freeview Advice line over the phone, webchat on the new website, and FAQs / how to videos for those who prefer to self-help. Our contact centre staff have received disability awareness training to better support those with accessibility requirements and have been fully trained to support the ATVG via the advice line, social media and email channels.

5.4   Additionally, as our linear TV guide is also available on mobile and web, the provision of accessibility features within these services means viewers have an alternative way of discovering content if unable to access features via their TV's native UI.

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Annex A: Device Models with Accessible TV Guide (Correct as of 2nd December 2020*)

Manufacturer	Range
Blaupunkt	2020 TVs
Bush	2019, 2020 TVs
Digihome	2019 TVs
Electriq	2019 TVs
Emotion	2020 TVs
Eternity	2020 TVs
Finlux	2019 TVs
Hisense	2016, 2019 and 2020 TVs
Hitachi	2019 TVs
Humax	4000T/5000T Freeview Play Recorder
JVC	2019 TVs
LG	All 2016-2019 Freeview Play TVs
Logik	2019 TVs
Luxor	2019 TVs
M&B	2019 TVs
Marlin	2019 TVs
Medion	2019 TVs
Mitchell & Brown	2019 TVs
Nordmende	2019 TVs
Panasonic	2015, 2016, 2017, 2018, 2019, 2020 TVs
Polaroid	2019, 2020 TVs
Sharp	2020 TVs
Solas	2019 TVs
TCL	2018 and 2019 TVs
Technika	2020 TVs
Techwood	2019 TVs
Toshiba	2019 TVs
UMC	2020 TVs
Walker	2019 TVs

*Live list of compatible models can be found at www.freeview.co.uk/help/accessible-tv-guide

Annex B: Accessible TV Guide Visuals
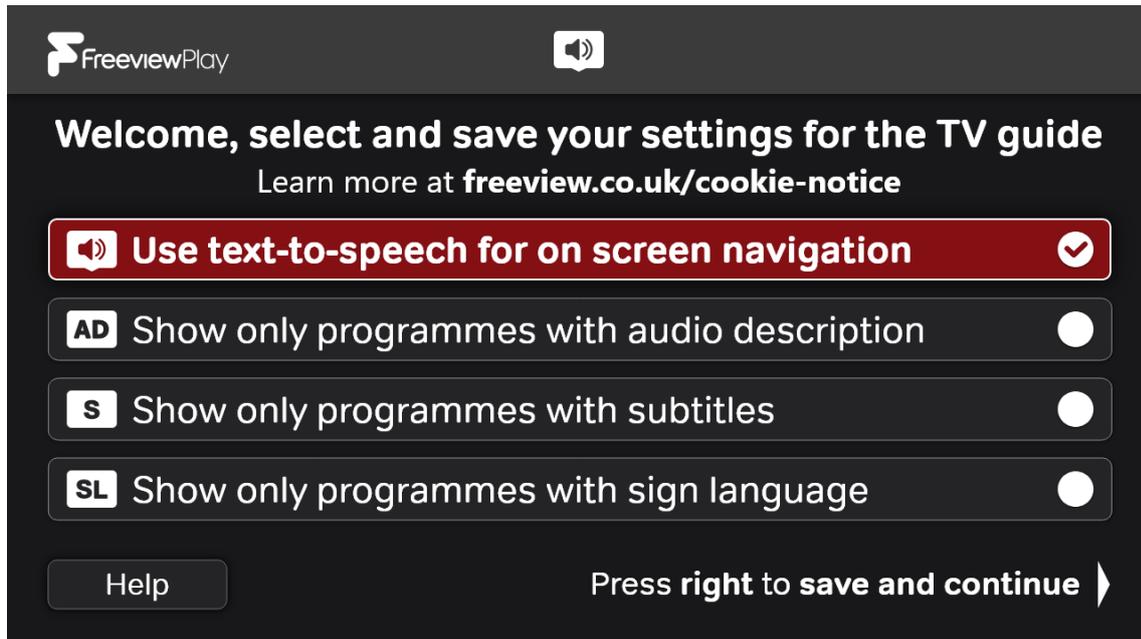
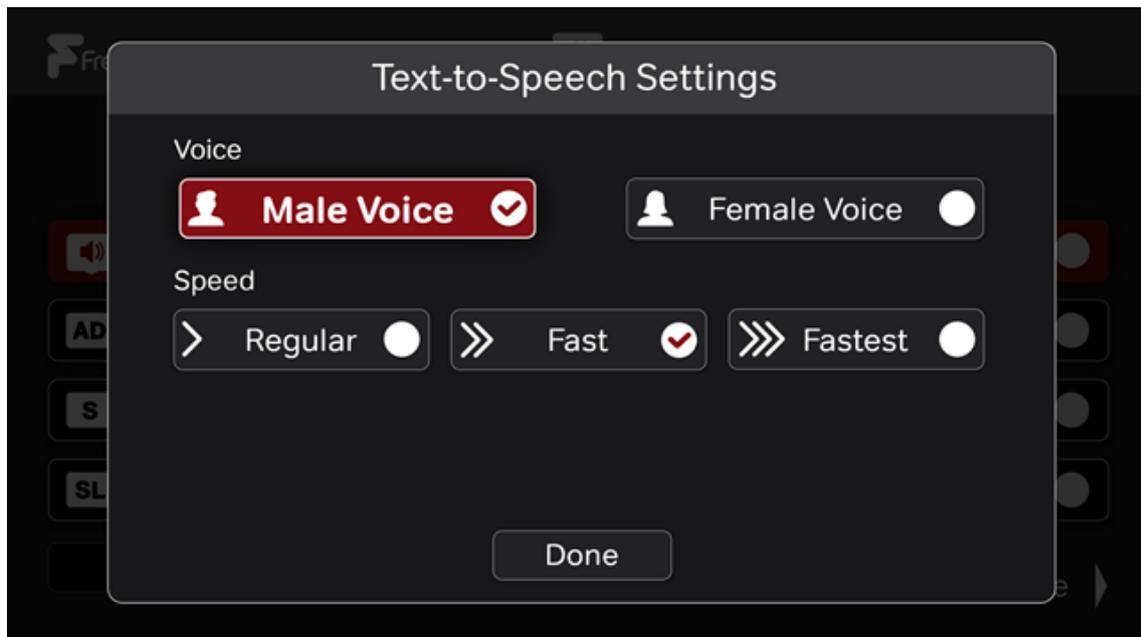Fig 1: Accessibility Preferences Screen

Fig 2: Text-to-Speech Settings

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Fig 3: EPG Screen