
EPG Accessibility

Annual report on improvements for people with visual impairments

[EPG Accessibility report](#) – Welsh Overview

Contents

Section

| | |
|---------------------------------------|---|
| 1. Overview | 3 |
| 2. Background | 5 |
| 3. Annual report on EPG accessibility | 9 |

Annex

| | |
|-----------------------------------|----|
| A1. Relevant EPG Code provisions | 20 |
| A2. Summary of available features | 21 |

1. Overview

- 1.1 People with visual impairments watch as much TV as other people but are confronted with particular difficulties when using TV programme guides (known as electronic programme guides or 'EPGs') to choose what they watch. As a result, their viewing choices can be unnecessarily restricted, and they could miss out on finding and viewing programmes.
- 1.2 [The EPG code](#) (drawn up under subsection [310\(3\) of Communications Act 2003](#)) sets out the practices to be followed by EPG providers so that EPGs can be used by people with disabilities.
- 1.3 In June 2018 following [consultation](#), we made [amendments to the EPG Code](#) to secure that people with visual impairments are able to use EPGs in the same way that people without such disabilities use them (see Annex 1). EPG providers now have to use reasonable endeavours, where practicable, to provide specific features (magnification, high-contrast displays, filtering/highlighting of accessible programmes, and 'text to speech' functionality).

The report in brief

This is our third annual report since the amendments to the EPG Code in 2018. We have previously acknowledged that it takes time to implement the changes required and that development cycles for hardware can take several years. While this remains the case, we now expect EPG providers to have either implemented the required features or to have clear plans in place to do so, where this has been practicable.

This year, rather than looking broadly at the features highlighted within the EPG code, our report focusses on each provider and the progress that has been made over the last year. We know that the COVID-19 pandemic has affected product development, but we are pleased to see that some providers have made progress despite this, although others have fallen further behind. Annex 2 provides a summary of the features currently available for each EPG.

We are grateful to RNIB for establishing a focus group which has allowed us to engage with users of these features and better understand how they are working for consumers in practice across a range of devices used to access the EPG (e.g. connected TVs or set-top boxes).

In summary:

- High-contrast displays and magnification are now available in some form on all EPGs, except for magnification on Virgin Media which is in development.
- Filtering and highlighting of content with audio description (and signing) is not as widely available, and our understanding from the RNIB focus group is that this relatively straightforward adjustment can be hugely valuable to users with sight impairment seeking audio-described programmes.
- Text to speech ('TTS') remains the most difficult feature to implement as an 'in-built' feature of the device used to access the EPG. Virgin is taking steps towards making TTS available in this way, though the details of Virgin's plans are not clear. In this reporting period, Sky completed development of its TTS solution, and has since successfully rolled out TTS across all Sky Q boxes. Digital UK has developed an innovative solution using a separate EPG accessed via Channel 555 on an increasing number of Freeview devices and offering all four accessibility features. Other providers generally use the separate functionality of mobile operating systems (STV), some smart TVs (Freesat) or integration with digital assistants such as Amazon Alexa (BT, YouView). These digital assistants do not currently offer functionality equivalent to TTS and our focus group participants noted that further development would be needed for it to be comparable.

2. Background

Ofcom's Powers

2.1 Paragraph 10 of the EPG Code reads in full:

EPG providers are required to produce an annual statement, by 30 November each year, of the steps they have taken and plan to take to facilitate the use of their EPGs by disabled people, specifying which steps they have taken to comply with paragraph 8 above (see section A1). If an EPG provider has been unable to secure all or any of the objectives set out in paragraph 8 on the grounds of practicability, this annual statement should outline the alternative steps they have taken to increase the accessibility of their EPGs. Ofcom will assess the adequacy of these statements in the light of the particular circumstances of each EPG.

2.2 EPG providers are required to produce an annual statement of the steps they have taken and plan to take to facilitate the use of their EPGs by disabled people. Ofcom produces annual reports on the providers' progress and compliance. Our reports also serve as a guide to consumers on where they can find accessible EPGs.

People with visual impairments

2.3 There are over two million people who experience sight loss in the UK today and this is expected to increase dramatically in the future. As people get older, they are increasingly likely to experience sight loss, and the UK population is ageing. In addition, sight loss is strongly linked with certain medical conditions such as diabetes and lifestyle factors including obesity - the rates of which are both going up. The number of people with sight loss is estimated to rise to 2.7 million by 2030. By 2050, the current figure will double to over four million.¹

2.4 Those affected by sight loss are more likely to be elderly, or financially vulnerable.² As well as a rise in number due to an ageing population, 39% of visually impaired people of working age say they have difficulty in making ends meet.³

2.5 Many programmes can be understood and enjoyed without perfect vision. Some television programmes (e.g. news, documentaries) rely heavily on speech, and others are accompanied by audio description. Most people with visual impairments will have watched television regularly before their sight was impaired and will not want to give up a familiar and enjoyable activity.

2.6 Television is also seen to help people to cope with social isolation, to which older people are particularly prone. The Covid-19 outbreak and subsequent lockdown has once again

¹ RNIB, 2015. [Key information and statistics](#).

² RNIB, 2015. [My Voice' report](#).

³ RNIB, 2015. [My Voice' report](#).

highlighted the importance that television can play in people's lives and especially the need for it to be accessible to all.

Electronic Programme Guides ('EPGs')

- 2.7 EPGs contain the listing and promotion of television programmes, as well as features that enable the user to access programmes. Access to programmes listed and promoted within the EPG is dependent on the data transmitted as a broadcast signal.
- 2.8 EPGs are licensed by Ofcom as television services and their providers must comply with the EPG Code (see below). The current EPG providers are: Sky, Virgin, YouView, Freesat, Digital UK for Freeview, and BT.
- 2.9 The EPG Code sets out the practices that EPG providers should follow in relation to assistance for people with hearing and/or visual disabilities, as well as practices to be followed in relation to the prominence of public service channels and the securing of fair and effective competition.
- 2.10 As well as reporting annually on EPG accessibility, Ofcom has a duty to regularly examine the sections of the EPG Code relating to [prominence](#). This includes amendments to ensure the main five PSB channels remain easy to find at a time when viewers increasingly watch TV online. In November 2020 we also reviewed the requirements to support fair and effective competition, and this [statement](#) set out our decision to retain competition rules on electronic programme guide (EPG) providers. Accessibility of the EPG will always be considered throughout these changes and any further work Ofcom undertakes in this area.⁴
- 2.11 In June 2018, following a consultation⁵, we amended the EPG Code⁶ so that visually impaired⁷ people can benefit from additional accessibility features. Our amendments were designed to ensure that in future, they should be able to use EPGs in the same way that people without such disabilities use them.
- 2.12 These amendments required EPG providers to use reasonable endeavours, so far as practicable, to include facilities for users to do all or as many as possible of the following:
- a) render text needed for EPG navigation and the provision of information on channels and programmes included in the EPG as speech ('text to speech' functionality or 'TTS');
 - b) highlight or list separately programmes with audio description, and with signing ('filtering or highlighting' functionality);
 - c) adjust the display of EPG information so that it can be magnified, or the text enlarged ('magnification' functionality); and

⁴ The [Digital Economy Act 2017](#) requires Ofcom to review the EPG Code.

⁵ Ofcom, 2018. [Review of rules for prominence of public service broadcasters and local TV](#).

⁶ Ofcom, 2019. [Review of prominence for public service broadcasting](#).

⁷ In this document, we use the term 'visually impaired' to refer both to those with partial sight loss, and those who are completely blind.

d) switch between the default and 'high-contrast' displays ('high-contrast displays' as referenced in section A1 of this report).

2.13 Providers are able to use 'equally effective' measures to provide these features within their EPGs. This was to enable providers to use innovative methods and provide flexibility for developments to take place within the market based on developing consumer preferences. We made clear in our 2018 statement that in determining what measures are 'equally effective' we would look at factors including whether they provide the same functionality and do not involve significant additional complexity or cost to consumers.

The four key accessibility features

- **Text to speech ("TTS")** Paragraph 8 (a) of the EPG Code defines this as the facility to "render text needed for EPG navigation and the provision of information on channels and programmes included in the EPG as speech". TTS is a key accessibility feature for those with more serious sight impairment. Full TTS capability is currently not provided in any of the EPG providers' set-top boxes.
- **Highlighting and filtering** Paragraph 8 (b) of the EPG Code defines this as the facility to "highlight or list separately programmes with audio description, and with signing".
- **Magnification** Paragraph 8 (c) of the EPG Code defines this as the facility to "adjust the display of EPG information so that it can be magnified, or the text enlarged". Magnification is a feature which is widely offered by the providers.
- **High-contrast displays** Paragraph 8 (d) of the EPG Code defines this as the facility to "select a 'high-contrast' display". A television's contrast ratio refers to the difference in light between the brightest whites and the darkest blacks that a display can produce.

Market Context

2.14 The current EPG licensees have varying levels of control over the elements needed to deliver accessibility features, including the software and hardware in TV receivers, both of which are essential to the delivery of the EPG. Nonetheless, we note that EPG licensees do normally have some degree of influence over the specification of many TV receivers which are either provided by EPG licensees to their subscribers or marketed by TV receiver manufacturers which have been granted a trademark licence by EPG licensees.

2.15 The nature and extent of this influence may vary. For example, our understanding is that Sky and Virgin have effective control of the features of set-top boxes made for them by contract manufacturers. By contrast, TalkTalk and BT, which use YouView-based boxes, might have to negotiate with other YouView consortium members (BBC, ITV, Channel 4, Channel 5, Arqiva) to secure agreement on a common specification and the sharing of development costs.

2.16 YouView, Freeview and Freesat all have limited control over the end products which use their standard. Each offer trademark licences to manufacturers of televisions and set-top

boxes and devise core common specifications for those products, requiring manufacturers to commit to those specifications. Some accessibility features are mandated within these providers' core specifications, but not all of them.

- 2.17 While YouView, Freeview, and Freesat could in principle mandate all the key accessibility features mentioned above within their core specifications, we understand that the less detailed the requirements and the more scope given to manufacturers to differentiate their products, the more likely it is that they will take out trademark licences. This in turn helps the licensors achieve their primary objective, which is to compete successfully for market share with pay TV operators.
- 2.18 We note that manufacturers of TVs as distinct from set-top boxes may only use basic EPG data from Freeview, and so Freeview's ability to influence them may be limited. However, some smart TV manufacturers already offer some of the proposed accessibility features in their TV sets, including TTS.
- 2.19 Over time, we would expect the cost of providing the accessibility features to fall due to the economies of scale, and the use of the necessary components in TV receivers to become more widespread. When the changes to the EPG Code were made in 2018, we noted that they would apply to the next generation of all TV receivers, including integrated TV sets. This recognised that the rollout of new hardware will also be constrained by product development cycles. We encouraged providers to work with manufacturers to incorporate accessibility features into hardware currently under development. In addition, where some of the changes simply required a software update, we expected EPG licensees to use their commercial influence to get the new accessibility features included in TV receivers that have already been supplied to consumers.
- 2.20 Over time, we would expect the cost of providing the accessibility features to fall due to the economies of scale, and the use of the necessary components in TV receivers to become more widespread.

3. Annual report on EPG accessibility

Summary

- 3.1 This is our third annual report since we amended the EPG Code in 2018, covering the second full year of reporting.
- 3.2 Our hope was that as two full reporting years had passed, providers would be able to offer more information on practical steps they have taken this year to improve the accessibility of their EPGs. While we acknowledge the adverse circumstances presented by the COVID-19 pandemic, some providers have made good progress despite this, and others have fallen further behind.
- 3.3 This year, rather than looking broadly at the features highlighted in the EPG code, our focus is on the providers and the individual progress that has been made. Providers' non-confidential submissions are published in full alongside this report. A summary of the providers' progress with implementing the features can be found in Annex 2, and a consumer-focused summary can be found in Annex 3. The providers full responses can be found on our [website](#).

Royal National Institute of Blind People Focus Group

- 3.4 Earlier this year, we engaged with the Royal National Institute of Blind People ("RNIB") on the current status of EPG accessibility. They organised a focus group in early April to give us some insight into the key concerns of blind and partially sighted people. The focus group included 5 people with sight loss including participants with some usable vision and participants with little or no usable vision. . This wasn't a representative group, but provided important understanding of the value of the various EPG features to the people who need and use them in practice.⁸
- 3.5 The key themes raised by the focus group around EPG accessibility are summarised below:
- a) "Built in" text to speech functionality that integrates well with other TV/set-top box features and apps is preferable to more complex alternatives (e.g. use of mobile phone companion apps). Innovative use of other devices such as digital assistants and voice search could use further development to ensure they provide comparable information and usability to speaking EPGs.
 - b) Being able to find content with audio description is very important. Highlighting such content, for example with an audible 'beep' when it is selected, is valuable but being able to aggregate or filter content that has audio description makes finding such content considerably easier.

⁸ Participants in the group used a range of EPGs and devices, some of which may not be the latest models, and others of which may have been released since the end of the period considered in this report.

- c) EPG providers should consider the user’s full experience of watching TV when developing accessibility features. Nowadays, many different devices and applications often come together to form a singular journey for audiences, making consistency and compatibility highly important.

3.6 We have considered these points and others raised by RNIB and their focus group participants throughout the document.

Progress report on EPG providers



Main features

- 3.7 BT does not currently offer TTS on its set-top boxes and did not indicate whether it had any plans to do so. TTS is a key accessibility feature for those with more serious sight impairment.
- 3.8 BT has however made progress this year by introducing dedicated areas within its genre-based aggregated areas for the lesser available access services (signing and audio description) to help users find content with these accessibility services. BT already provides magnification in the form of a zoom functionality on the user interface (UI) and offers a high-contrast display EPG, providing the 7:1 contrast ratio requirement⁹ as a minimum on its set-top boxes. BT has met this requirement every year since our first report.

Additional areas

- 3.9 BT has taken additional steps to improve EPG accessibility, for example having the option to remove channel logos and to remove transparency, so users can choose a solid EPG background. Amazon Alexa devices can also be used to search for programmes on BT TV boxes.
- 3.10 BT did not report any engagement with user-groups or charities in the development of its EPG’s.

Ofcom response

- 3.11 Overall, BT has three of the four key accessibility features across all available devices. BT has made real progress this year with the introduction of dedicated areas for less available services (signing and audio description) meaning BT offers three of the four key accessibility features.

⁹ The EPG Code defines a ‘high-contrast’ display as one with a contrast ration of no less than 7:1.

- 3.12 We are encouraged by the integration of Amazon Alexa devices and BT TV boxes, however our engagement with RNIB suggests that further development of this feature for people with sight loss would be needed to provide greater control and information.
- 3.13 We are disappointed that BT has not taken any steps towards introducing built-in TTS, one of the most important accessibility features for users with severe sight-impairment. We hope BT will engage with charities and consumer groups in the future to gain a better understanding of the benefits of TTS, and we will continue to engage with BT over this issue.

DigitalUK

Main features

- 3.14 This year, Digital UK has implemented its Accessible TV Guide (ATVG), a separate EPG accessed through channel 555 on an increasing number of Freeview Play devices. This offers all four accessibility features using an innovative solution to get around some of the challenges presented by the hardware.
- 3.15 We are pleased to see Digital UK has successfully launched its accessible TV Guide (ATVG) on 50% of compatible devices (Freeview Play TVs and set-top boxes) and aims to roll out to the remaining 50% of compatible devices over the next 5 months. Digital UK provide a live list of device models that are compatible with the ATVG on its [website](#).
- 3.16 Digital UK has informed Ofcom that the ATVG provides TTS and the ability to filter and highlight accessible content. The ATVG allows the user to select its accessibility preferences upon first use, and these choices will be saved and used to select what is shown on the guide from that point forward. In last year's report, Digital UK confirmed highlighting and filtering is available as a function on some compatible smart TVs through which the Digital UK EPG is available.¹⁰
- 3.17 The ATVG displays text content two 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). 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. In [last year's report](#), Digital UK confirmed that whilst Freeview had no magnification features of its own, it is compatible with the zoom functionality on specific smart TVs.
- 3.18 The ATVG has a display with a minimum of 7:1 contrast ratio, with some areas providing higher contrast than this. In [last year's report](#), Digital UK confirmed that high-contrast displays are available on Freeview as the default setting on some TVs.

¹⁰ Ofcom, 2020. [EPG Accessibility Report](#).

Additional areas

- 3.19 Digital UK has taken additional steps to improve EPG accessibility, for example providing an online EPG¹¹ which has accessible view capabilities, and the Freeview mobile app TV Guide can become a talking initial EPG if the user switches on iOS Voice Over or Android TalkBack.
- 3.20 Digital UK reported that it has worked closely with accessibility groups and ensured the feedback was taken on board at each stage of development of the new accessible TV guide.
- 3.21 It has worked with the Digital Accessibility Centre¹² during the design phase to receive feedback on the concept and designs, and AbilityNet¹³ supported the user testing of key features on the ATVG. DigitalUK has also held meetings with RNIB, RNID¹⁴, Scope¹⁵ and Ofcom's Communications Consumer Panel, to receive feedback on demos of key features. The Accessible TV Guide won Gold at this year's Connected TV Awards for 'Advancing the User Experience'.¹⁶

Ofcom response

- 3.22 Digital UK has made good progress as its new ATVG has been successfully launched on half of compatible devices, and the remaining half should be rolled out in the next 5 months. It is important that visually impaired consumers have access to information about what accessibility features are available for them. Therefore, we welcome the timeframes that Digital UK has given us regarding the roll out of the ATVG to the remaining 50% of compatible devices, as this means we can include the most up to-date and accurate information in our report.
- 3.23 We are particularly encouraged by the efforts that Digital UK has made in developing a separate EPG designed specifically for accessible users which can be accessed through channel 555.¹⁷ We consider this an important example of how 'alternative measures' can be taken in consultation with users to innovate in the provision of accessible EPGs. Similarly, Digital UK has thoroughly engaged with user-groups and charities to inform decisions for the ATVG and receive feedback on its key accessible features.

¹¹ [Freeview TV Guide](#).

¹² Digital Accessibility Centre (DAC) is a non-profit social enterprise and one of the leading providers of web accessibility services.

¹³ AbilityNet is a company and charity to support people of any age, living with any disability or impairment to use technology to achieve their goals at home, at work and in education.

¹⁴ The Royal National Institute for Deaf People, known as Action on Hearing Loss from 2011 to 2020, is a charitable organization working on behalf of the UK's 9 million people who are deaf or have hearing loss.

¹⁵ Scope is a national disability charity that campaigns to challenge and change negative attitudes about disability and provides direct services.

¹⁶ Videonet, 2020. [Videonet Connected TV Awards](#).

¹⁷ For further detail regarding Freeview's HbbTV based accessible programme guide (Channel 555) see Freeview's response [here](#).



Main features

- 3.24 TTS is not available on Freesat's set-top boxes, however it is available as a function on some compatible smart TVs through which the Freesat EPGs are available. Similarly, Freesat has no magnification features of its own, but is compatible with the zoom functionality on some smart TVs.
- 3.25 This year Freesat has introduced high-contrast displays on its new generation of 4K set-top boxes, with a display contrast ratio of at least 7:1, and a dedicated high-contrast user interface (UI) with a contrast ratio of at least 18:1. Some Freesat-enabled smart TV's also have high-contrast displays.¹⁸ Freesat also provides an audio beep feature that indicates when audio description is available for the highlighted or selected programme on the EPG.

Additional areas

- 3.26 Freesat has taken additional steps to improve EPG accessibility, for example providing dedicated subtitle and audio description remote control buttons.
- 3.27 Freesat did not report any engagement with user-groups or charities in the development of its EPGs.
- 3.28 It has been recently announced¹⁹ that DigitalUK is to combine the operations of Freeview with those of the satellite platform Freesat.²⁰ Freesat has said the integration will help ensure viewers continue to have access to a range of free-to-view TV services in the UK, as well as benefit from technological innovations and developments across the two services.

Ofcom response

- 3.29 While we are encouraged to see that all four accessibility features are available in some locations, we are disappointed not to be able to report on timelines for the full implementation of the features across all Freesat-enabled TV's or across Freesat set-top boxes. We are encouraged that Freesat has introduced high-contrast displays on its new generation of set-top boxes, however TTS and magnification are still not supported.
- 3.30 We recommend that Freesat engage with charities and consumer groups in the future to gain insight into the benefits of improving the availability of accessible EPG features universally across its devices. We will continue to engage with Freesat over this issue.

¹⁸ For the Freesat 4K range of set-top boxes, the high-contrast feature displays all of the UI in high-contrast (black/white). For the relevant smart TVs, the TV manufacturers determine where and how this is implemented.

¹⁹ Freesat, 2021. [Freesat press release](#).

²⁰ Digital UK, which is owned jointly by the BBC, ITV and Channel 4, facilitates the Freeview TV platform, while Freesat is a subscription free satellite platform operated on behalf of the BBC and ITV.

- 3.31 We hope that the integration of Digital UK and Freesat will bring the current and future accessibility features offered on Freeview to Freesat.



Main features

- 3.32 In our previous report, we outlined Sky’s plans to include TTS by the end of 2020 in the latest Sky Q box and the plan to roll it out on older Sky Q set-top boxes. Sky also planned to make this feature available on other devices (e.g. iOS and Android). In the reporting period of this year, Sky completed development of its TTS solution and began the roll-out on Sky Q set-top box models. Sky has since confirmed that it has successfully rolled out its TTS solution on all Sky Q set-top box models as of the end of April 2021.²¹ The TTS solution will also be available to any third parties on Sky’s platform should they wish to offer TTS in their applications.
- 3.33 Sky currently provides highlighting of subtitled and audio described content on its set-top boxes, however it does not yet provide the same for signed content. Sky has stated that this is a priority for them and hope to release this feature by Autumn 2021 across all Sky Q set-top box models. Across all Sky set-top boxes there is facility to enable a ‘beep’ to be heard if audio description is present when scrolling from one channel to another. Sky boxes do not facilitate the filtering of accessible content.
- 3.34 Although Sky does not offer magnification across all its set-top box models, the font can be made larger or bolder on the Sky+ HD set-top boxes. Sky has stated that research is ongoing with regard to text magnification across all its set-top box models.
- 3.35 All Sky’s set-top boxes provide the 7:1 high-contrast ratio requirement as a minimum, which Sky developed based on insight from RNIB. Sky has met this requirement every year since our first report.

Additional areas

- 3.36 Sky has taken additional steps to improve EPG accessibility, for example providing accessible remotes to customers free of charge, and the Sky Q remote has voice capability which Sky continually improves to allow users to conduct increasingly complicated and rich searches through voice commands. The older models of Sky Q and the new Sky Q 1TB UHD boxes offer a high-end user interface with artwork and imagery.

²¹ On all Sky Q set-top box models in the UK and Ireland.

- 3.37 Sky did not report any recent engagement with user-groups or charities, but in previous years has brought together its technology and design teams and RNIB in order to discuss how magnification could be best implemented on the EPG.

Ofcom response

- 3.38 We are pleased to see that Sky has prioritised work on TTS over the reporting period, and that it has been successfully rolled out since then. It is particularly encouraging to see that the TTS functionality is not limited to just the linear/broadcast elements of the EPG (the Code requirement) but also other aspects such as on-demand content. The value of TTS is emphasised by charities and user-groups.
- 3.39 Sky's accessible remote is a good step and demonstrates commitment to make its devices more accessible. One issue raised about this remote in the RNIB focus group was its unfortunate lack of voice search at this time, compared to the standard Sky Q remote.
- 3.40 We would like to see concrete timelines and proposals for the introduction of magnification and filtering of accessible content across all of its set-top boxes in the future. The RNIB focus group demonstrated the importance of filtering accessible content, particularly content with audio-description, as opposed to only highlighting or flagging this content on the EPG.



Main features

- 3.41 Virgin Media has confirmed it aims to deliver the accessibility features specified in the EPG Code in the next generation 'Horizon' platform. Virgin told Ofcom it is confident it will be able to deliver all four features on the 'Horizon' platform.
- 3.42 Virgin informed Ofcom that it will not have the accessibility features in place for the platform's launch. Once the 'Horizon' platform is available to all customers, Virgin aims to enable all four features on devices.
- 3.43 Virgin confirmed that high-contrast EPG displays are available on the V6 platform, across the Guide, Channel Bar and Mini Guide of the Tivo platform, and across the whole UI of the 360 platform.

Additional areas

- 3.44 Virgin has not reported any additional steps taken to improve EPG accessibility across its set-top boxes, and Virgin has confirmed it is not currently working to develop alternative steps for the four required features given its plans for the Horizon platform.
- 3.45 Virgin has not reported any recent engagement with user-groups or charities, but in 2018, the DAC reviewed Virgin Media's plans for the new Horizon platform, and Virgin Media has

confirmed that it plans to work with them throughout the continued development of the platform.

Ofcom response

- 3.46 As this is Ofcom's second full reporting year to pass since 2018, we are disappointed that Virgin Media's response is not more forthcoming in the details on how it will implement the key accessibility features on the 'Horizon' set-top boxes. We encourage Virgin to provide more detail on developments in its reporting.
- 3.47 We are however encouraged that Virgin is confident that the 'Horizon' platform will provide all four key accessibility features to its users, and that the features are on track to be rolled out. Our engagement with RNIB highlighted the difficulty people with sight loss have using current Virgin Media devices due to the lack of accessibility features and we hope that the 'Horizon' platform will turn this around.
- 3.48 Virgin has not reported any specific recent engagement with user-groups or charities, but it has stated it intends to continue to work closely with DAC to gain their support now that the product has launched and carry out further testing to ensure that the platform remains accessible.



Main features

- 3.49 YouView do not currently provide TTS capability on its set-top boxes, but since last year it has launched an integration with Amazon's digital assistant on newer set-top boxes that allow users to search on the box using speech.
- 3.50 YouView offers filtering and highlighting of some subtitled and audio described on-demand content in a separate user interface (which does not form part of the standard EPG) on newer set-top boxes, but do not yet provide it for broadcast content on the EPG. YouView repeated last year's statement that it will aim to make efforts to incorporate this feature on future set-top boxes.
- 3.51 YouView offers magnification within its set-top boxes through a zoom function and provides the 7:1 contrast ratio requirement as a minimum across all generations of YouView set-top boxes.

Additional areas

- 3.52 YouView highlighted the work it has done in the past with user-groups and charities but did not comment on any recent developments or collaboration. In 2016 YouView presented its high-contrast displays and magnification capabilities to RNIB, the DTG Accessibility Group and they were tested by the DAC.

Ofcom response

- 3.53 YouView provides two of the four key accessibility features 'built-in' across its set-top boxes, the second most of the providers. We are pleased that YouView has confirmed that it will make reasonable endeavours to make filtering and highlighting of linear content and TTS available. However, we are disappointed YouView are not more forthcoming on the detail of how and when it will meet the requirements.
- 3.54 Our engagement with RNIB leads us to believe that while digital assistants can be a valuable tool, their value can be limited if restricted to voice search. Further development to provide greater information and features through these assistants should be considered.



Main features

- 3.55 STV's TV Guide can be accessed in various locations by its audience on the STV Player; it can be accessed through stv.tv or through the STV Player apps for Android and iOS.
- 3.56 Voiceover support for the TV Guide is available on its [browser](#) and through the STV Player mobile apps
- 3.57 Filtering and highlighting of accessible content are not currently available on the TV Guide.
- 3.58 The TV Guide page can be magnified and STV provides the 7:1 contrast ratio requirement as a minimum on its browser, but it is not yet available on the STV Player apps.²²

Additional areas

- 3.59 STV did not report any engagement with user-groups or charities in the development of its EPGs. STV did mention that the presentation of information on the STV player is still being user-researched and improved upon.

Ofcom response

- 3.60 This is STV's first year of reporting as an EPG provider, and it has made a promising start, already supporting TTS in some locations and magnification across all devices and high-contrast displays in some areas. We hope to see STV make endeavours to implement high-contrast displays more widely and introduce filtering and highlighting.

²² For more information on STV's TV Guide and its Channels page, please see STV's response [here](#).

Ofcom general comments / next steps

- 3.61 We understand that implementing the new Code requirements takes time given the product development cycles of EPG providers and equipment manufacturers which can vary and last several years. This report marks the second full reporting period since the amendments to the EPG Code in June 2018, giving providers 30 months to implement the four key accessibility features or appropriate alternative steps.
- 3.62 Last year, most providers focused on reporting their detailed plans for implementation of these accessibility features and we set out our expectation that these plans would be put into practice by this year, so that these features would be available for audiences.
- 3.63 We are encouraged by the progress that has been made and the innovative approaches taken by some EPG providers, such as Digital UK's separate EPG designed specifically for users with accessibility needs and the new Sky Q features. However, there is still work to do as many EPG providers do not offer the full list of accessibility features or suitable alternatives, or only offer them on a subset of their devices.
- 3.64 Some providers, such as Digital UK and Sky, have clear plans in place to bring additional features to existing devices. Virgin has stated that the full set of features will be available on the upcoming 'Horizon' product, though a clear timeline has not been given. Others have not offered timelines for the implementation of certain features, such as BT and Freesat's delivery of text to speech.
- 3.65 The magnification and high-contrast display features are the most widely available across the EPG providers. Highlighting and filtering are available on some EPGs and are planned for others. We would like to underline the importance of both sides of this feature, namely highlighting audio-described content and being able to list it all in one place. The ability to clearly identify content with audio description continues to be raised as a key issue by RNIB.
- 3.66 Text to speech is the least adopted key accessibility feature and the use of digital assistants has been offered by several providers as an alternative. We have been informed by RNIB that such assistants can be valuable accessibility tools, but that their functionality is often limited and further improvements for their use by people with visual impairments are needed. For them to be an appropriate alternative to text to speech, providers should consider how digital assistants can be used to supply information to audiences comparable to that which would be provided by a speaking EPG.
- 3.67 In our previous report, we encouraged providers to consider the level of detail they provide in their annual reports regarding the timelines for feature delivery and the effectiveness of alternative measures, in addition to limiting the confidential elements of their reports to the minimum necessary to protect commercial sensitivities. While we have seen some improvement, we need to restate these expectations this year and will highlight them in our information requests to the providers in the future. We will also be asking on a voluntary basis for information on additional measures taken by the providers to improve

ease of access more generally for those with visual impairments beyond the four key accessibility features.

- 3.68 During a time of such quickly evolving audience habits and technological developments, it is of utmost importance that EPG providers engage with user-groups, charities and trade bodies that represent people with disabilities or impairments. This is particularly important when considering alternate or additional steps that can supplement the four key accessibility features. We encourage EPG providers to engage with such groups regularly to test their plans.
- 3.69 Our recent engagement with RNIB highlighted the importance of consistency in the features of TV receivers and how they interact with other devices in the user's experience, such as third-party apps. We encourage EPG providers to carefully consider the full user journey for someone with sight loss and how their products fit into a wider experience. Over the next year we will look to facilitate greater engagement between EPG providers and user groups.
- 3.70 Ofcom's requirements in this area represent a baseline to ensure that television services can be enjoyed by all audiences. However, it is the experience of these audiences that should be the primary motivator and focal point when developing accessibility features.

A1. Relevant EPG Code provisions

A1.1 The [EPG Code](#) sets out the following in relation to assistance to people with hearing and/or visual disabilities:

- a) general principles with which EPG providers must comply. Amongst these is a required practice to make such adjustments to their EPGs as are practicable to secure that they can be used by people with disabilities affecting their sight or hearing for all the same purposes as they are used by other people (paragraph 6(a));
- b) an expectation that the needs of people with disabilities affecting their sight or hearing should be an integral part of planning for the future development of EPGs. To this end, Ofcom expects EPG providers to consult disability groups about the way they meet their obligations under the code, and to work with disability groups, broadcasters and set-top box manufacturers on ways of improving usability (paragraph 7);
- c) that EPG providers should use 'reasonable endeavors so far as practicable' to secure accessibility features or 'equally effective measures' including text to speech, highlighting or listing, display adjustments for magnification or text enlargement and high-contrast displays (paragraph 8);
- d) an expectation that EPG providers work with manufacturers of TV receivers to make the accessibility features listed in paragraph 8 available in new models and any subsequent models, unless the associated estimated costs show that the adoption of any specific accessibility feature would be unduly burdensome; (paragraph 9)
- e) a practice for EPG providers to produce annual statements of the steps they have taken and plan to take to facilitate the use of their EPGs by disabled people, specifying which steps they have taken to comply with paragraph 8 (paragraph 10);
- f) a reminder of the obligations EPG providers have under the Equality Act 2010 to make reasonable adjustments in the provision of facilities and the delivery of services so as to make these accessible to disabled people (paragraph 11);
- g) a practice for EPG providers to ensure that programme information denotes whether access services are provided, using standard acronyms: S (subtitling), SL (sign language) and AD (audio description) (paragraph 12);
- h) a practice for EPG providers to provide information for people with disabilities about assistance in relation to programmes (e.g. how to use the EPG) (paragraph 13); and
- i) a practice for EPG providers to work with broadcasters, platform providers and disability groups to publicise the information and facilities available on EPGs to assist disabled people (paragraph 14).

A2. Summary of available features

| KEY |
|--|
| + Full feature available across all relevant devices |
| < Available on some devices or through alternative solutions |
| * Not available on any device or through alternative solutions |

| EPG Provider | Text to Speech | Filtering / Highlighting | Magnification | High contrast displays |
|-----------------------------|--|---|---|---|
| BT | Yes < Can search through Amazon Alexa devices | Yes + | Yes + | Yes + |
| DigitalUK (Freeview) | Yes < Currently available on 50% of compatible devices, additional 15% over next 5 months ²³ | Yes < Currently available on 50% of compatible devices, remaining devices over next 5 months | Yes < Currently available on 50% of compatible devices, remaining devices over next 5 months | Yes < Currently available on 50% of compatible devices, remaining devices over next 5 months |
| Freesat | Yes < Available through some smart TV's | Yes < Available through some smart TV's | Yes < Available through some smart TV's | Yes < Available on Freesat 4K range of boxes and on some smart TV's |
| Sky | Yes + TTS is available on all Sky Q set-top box models ²⁴ | Yes < Available for subtitles/AD, SL highlighting available by Autumn 2021 on Sky Q | Yes < Available on Sky+ and Sky+ HD set-top boxes | Yes + |
| Virgin Media | No * Currently unavailable. Will | No * Currently unavailable. Will | No * Currently unavailable. Will | Yes + Available on TiVo, T6, and 360 platforms. Will be |

²³ Further roll-out dates dependent on ongoing investigations into technical complexity with partners.

²⁴ In this year's reporting period, Sky completed development of TTS and has since rolled out the feature to Sky Q boxes.

| | be enabled on 'Horizon' | be enabled on 'Horizon' | be enabled on 'Horizon' | enabled on 'Horizon' |
|----------------|--|---|----------------------------|-------------------------------|
| YouView | Yes < Amazon digital assistant available on newer devices | Yes < Available for some on-demand content | Yes + | Yes + |
| STV | Yes < Voiceover support in some locations | No * Currently unavailable | Yes + | Yes < Available on browser |