



**PROVISION OF ELECTRONIC PROGRAMME GUIDES (“EPGS”) UNDER TELEVISION LICENSABLE  
CONTENT SERVICE LICENCE NUMBER: TLCS000243BA**

**STEPS TAKEN BY SKY UK LIMITED IN RELATION TO EPG ACCESSIBILITY**

SECTION 1 – INTRODUCTION

- 1.1 This is Sky’s response to Ofcom’s request to provide an annual statement about the steps we have taken, and plan to take, to facilitate the use of our EPG by disabled people.
- 1.2 Paragraph 10 of Ofcom’s Code of Practice on Electronic Programme Guides (the ‘Code’) states that *“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”*.
- 1.3 The Code states that Ofcom will assess the adequacy of these statements in the light of the particular circumstances of each EPG and that EPG providers are expected to consult with disability groups about the way they meet the obligations under the Code.
- 1.4 This statement sets out the steps taken by Sky to ensure accessibility of its EPG.
- 1.5 The Code also calls for EPG providers to use reasonable endeavours to secure so far as practicable the following features (or their equivalents) on EPGs accessed on new models of TV receiver beginning development after 27 July 2018 and subsequent models (“New TV Receivers”):
  - (a) text-to-speech (TTS);
  - (b) the ability to filter/highlight audio description and signing;
  - (c) text magnification;
  - (d) high contrast displays (together, the “Specified Features”).
- 1.6 Sky currently has one model of Set-top-box (STB) which qualifies as a New TV Receiver and is therefore in scope of the requirements of the Code. This is the 1TB UHD model of our Sky Q STB. This sits alongside the previous model of Sky Q STB and our Sky+ STB, both of which pre-date the above requirements. Separately in 2021 Sky launched the Sky Glass streaming television, and this year we launched Sky Stream which is an internet-connected box that can be plugged into other televisions to offer the Sky Glass interface. For completeness, we will highlight the accessibility features available on Sky Glass/Stream where relevant in this report.
- 1.7 As our previous reports have shown, Sky takes its responsibilities in this area seriously and has taken many steps to create EPG environments that are accessible. We have done much innovating and investing to deliver accessible functionality to customers. Consequently, our EPG areas contain much of what Ofcom expects to see in terms of accessible features. We have also begun to look beyond the four features required of the Code and are striving to supplement these features with other things that increase the accessibility of our products and support those with other needs beyond ones related to sight/hearing.

- 1.8 We are now taking an inclusive design approach which means we are finding ways to understand the needs of our diverse customer base before designing our products. This enables us to meet the needs of our under-represented customers, that will in turn ensure we create products that all can enjoy. We do this through a number of different means (e.g. user testing, community forums and closed forum networks).

## SECTION 2: CODE REQUIRED FEATURES

### 2.1 Text-to-Speech (TTS)

- This feature launched on all models of Sky Q box in the UK and Ireland in 2021. The functionality is not limited to just the linear EPG elements as required by the Code, but rather it stretches across much of our User-Interface (UI) such as our On Demand pages/content. Other helpful and often used features are also covered, for example when downloading begins and a programme is ready to view this will be voiced, as will the 'Accessibility' settings section, and PIN requests and attempts. For ease-of-use, customers are able to turn this TTS (or 'Voice Guidance') functionality on or off via their Voice Remote commands. We will also continue to review the functionality and we aim to continue to improve and extend the TTS offering to continue to better serve those with accessibility needs.
- Over the course of this year we have ensured that our Voice Guidance product has been evolved where our UI has changed.
- This year we have also been working to expand Voice Guidance onto our newer Sky Glass and Sky Stream products. Glass/Stream uses a different EPG technology to Sky Q and therefore our Voice Guidance offering required re-working for these environments. We have been committed to ensuring these platforms get Voice Guidance as soon as possible and at time of writing we expect it to be launched on Glass/Stream at the end of 2022 or in early 2023.

### 2.2 Filtering/Highlighting

- Across all our EPGs we have the facility to highlight programmes with Subtitles or Audio Description on the main TV guide listing.
- Across all our EPGs we have the facility to enable a 'beep' to be heard if Audio Description is present when scrolling through from one channel to another in programme viewing. We also display AD, S, SL (Audio Description, Subtitling, Sign Language) text when a programme is selected on the TV Guide or when the 'i' button is pressed on the remote control.
- In Spring 2021, Sky notified broadcasters of the capability in a new EPG specification to supply Sign Language as a specific metadata element (following the approach used for Subtitles and Audio Description).
- This year we have been working with the UK and Irish PSBs on providing this data and in Summer of 2022 Sign Language flags launched on all models of Sky Q and on Sky Glass/Stream.
- Viewers can now use the same highlighting capability as for Subtitles and Audio Description to easily identify signed content in the full TV Guide with a high-contrast highlight state.
- Additionally on Sky Q there is a page, which is accessible via a voice prompt, which breaks down by genre the programmes with Audio Description that are available for the coming 7 days on live channels.
- Beyond this we have also worked to curate areas where suitable content is collated to enable easy searching/finding. Our On Demand catalogue includes an extensive collection from BSL Zone – which is fully searchable including by voice. This content collection has

been available on Sky+/Sky Q/Glass for some time and earlier this year it was also added to NOW and Sky Go. Over the past year we have also been working with the Makaton Charity and as part of this we launched a Sky Q/Glass Voice destination page in collaboration with the Makaton Charity featuring content that is suitable for audiences with cognitive needs, especially younger audiences. You can get to the page by using the voice command 'Makaton', and it includes a range of content from across Sky Kids and our content partners, as well as dedicated YouTube channels from Makaton and Singing Hands, among others.

- Given the features we have now made available in this space, our approach to content curation and our voice control functionality on Sky Q/Glass/Stream (more on this below), we believe that our EPGs afford users excellent ability to find programmes with access services. We do not for example offer a full subtitling filter, because we do not believe this would be a useful function for our users. This kind of filter would return thousands of results, especially as streaming apps become increasingly integrated into our search capabilities. We are confident that our offered functionality, alongside our curation and the use of 'show pages' where people can get full details on access services that are supported on a programme, ensure that users have excellent means of discovering accessible content as required by the Code.

### 2.3 Text Magnification

- The Sky+ HD STB has an 'Increase Homepage Font Size' setting in the Accessibility menu. This complements the High Contrast and Bolder Font setting and ensures that the font on the rich Homepage we offer can be adapted further.
- The image-led user interface and focus-based navigation of Sky Q and Sky Glass/Stream does makes text magnification a complex and expensive proposition to deliver successfully. However these EPGs offer a high-end user interface rich in imagery, displaying TV content artwork or images. This helps customers navigate and find their content on screen.
- Based on customer research in this area we have already begun exploring ways to simplify and increase the standard text size that we use in the TV Guide menus on Sky Glass/Stream.
- Over the course of this year we have conducted customer research along with the RNIB and guided by this we have been progressing design work and expect to start development on solutions for Sky Q and Sky Glass/Stream in 2023.

### 2.4 High Contrast Displays

- Across all of our EPGs we have the ability to enable a High Contrast setting (which we developed based on insight from the RNIB).

## SECTION 3: SUPPLEMENTARY FEATURES

### 3.1 Voice Commands

- Sky's Voice control and search capability is supported across all Sky Q device models. Managed using the remote control, features include channel tuning, volume control, and programme search. In 2021, Sky added the capability for customers to use Voice to discover all audio-described content available on live TV in the coming week, segmented by genre. Research with Sky customers who are blind has been undertaken throughout the development of our Voice technology and it is an increasingly valuable tool for those with accessible needs making it much easier to do actions like recording programmes or navigating through our TV Guide and UI screens.
- All Sky Glass devices support Voice via the remote control and also hands-free control, using a wake word ('Hello Sky').

- The capabilities of Sky's Voice platform, supporting both Sky Q and Sky Glass continued to be extended through 2022.
- 3.2 Remote Controls
- This year we have worked with both the RNIB and some of our visually impaired customers to make improvements to the existing remote control. These changes have included increased font size and contract of the keypad, increased weight of icons, dishing of the voice key (i.e. improving the shape to allow for it to be easily distinguished), a tactile divider on the volume key and changing the volume icons from arrows to speaker symbol. All of these changes are due to be rolled out from early 2023.
- 3.3 Connectivity
- Recently functionality has been added to Sky Glass which allows customers to connect a supported Bluetooth headset. This is an inclusive feature that will enable customers with additional hearing needs to better experience audio on the platform.
- 3.4 Accessible Content
- Naturally as Sky is also a broadcaster with our own channels and content available via our EPGs/UIs, we are also keen to ensure that we exceed requirements and provide access services on as much of our content as possible.
  - At the time of writing, we now provide subtitles on 100% of content across linear and VOD for 24 out of 26 Entertainment and Sky Cinema channels. The remaining two should be at 100% by the end of 2022.
  - In 2023 we are also aiming to further increase our audio description coverage, with the amount of content available on linear to be increased, and by summer 2023 audio description should be available across all of our on-demand platforms.
- 3.5 Earlier this year we also carried out research on subtitle customisation and in 2023 we will continue to research and test this feature with our customers.
- 3.6 Training
- Previously we trained over one hundred staff members on assistive technology to give our customer advisors more insight into how our blind and physically impaired customers use our products and services. These staff members now form a network to share best practice within their departments.
  - This year we have created new education modules for staff to learn about disability awareness, assistive technology and how to build this into one's role at Sky. These training courses are on Sky's internal learning platforms and are available to all staff.