



2021 EPG Accessibility Statement

14th December 2021

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 platform 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 and Channel 4.

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 17 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 set out in our previous reports.
- 2.2 In response to these amendments, we launched our award-winning Accessible TV Guide (ATVG) solution in October 2020; available on connected Freeview Play devices via channel 555. It is a separate, additional guide to the standard linear EPG, designed to comply with the four priority accessibility requirements outlined in the EPG code: magnification, filtering, high contrast and text-to-speech (TTS).
- 2.3 The ATVG initially launched to 53% of connected Freeview Play devices in October 2020, followed by an additional 41% of the total between September and December 2021 – giving 94% coverage of connected Freeview Play devices already in the market. We are continuing to explore this final 6% of existing devices and hope to release the ATVG to as many as technically and commercially feasible.
- 2.4 We are also pleased to say that as of January 2021, device compatibility with the ATVG has been added to the Freeview Play conformance process (the device test manufacturers must take before we give them the Freeview Play trademark for new device models). Since this point, all new models from all but one manufacturer has had access to the ATVG once connected to the internet and we expect all future Freeview Play devices to be compatible.
- 2.5 Approximately a third of Freeview Play devices already in the market have received a modified version of the ATVG which does not include TTS functionality. This is due to the technical complexity of implementing the TTS feature. We understand that this will be a frustration to viewers who would benefit from this feature, and we will continue to work hard with our manufacturing partners to try to resolve this issue. However, our priority has, and continues to be, bringing benefit to our viewers, and we were keen that resolving this complexity did not inhibit access to the remaining useful features. We therefore made the decision to release the modified version to ensure the ATVG is available to as many homes with existing devices as possible.
- 2.6 We strongly believe in maintaining full transparency with our viewers and have included a full list of compatible devices on our [website](#) (see also Annex A). This clearly differentiates between those models with and without TTS to enable consumers to make informed purchase decisions based on their specific accessibility needs.
- 2.7 Response to the launch of the ATVG has been hugely positive, with several good reviews and promotions from prominent advocacy groups. We hope to build on this good feedback through future developments to the ATVG, including the addition of On-Demand content, refinement of core features, and potential additional accessibility options such as differing colour filters.

- 2.8 We are also continuing to encourage our manufacturer partners to include accessibility features within the native UIs wherever possible, via our Freeview Play requirements document. However, as Digital UK highlighted in its 2020 report, we do not own the native UIs of Freeview Play devices and cannot guarantee the implementation of these features. We believe the ATVG is a suitable alternative measure and are therefore focusing our resource on supporting and enhancing the ATVG product as the means to deliver accessible EPG services to our viewers.
- 2.9 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. The Accessible TV Guide (ATVG)

Overview

- 3.1 In response to Ofcom's 2018 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. This channel number was chosen due to the raised node that often appears on the number 5 button on a remote control.
- 3.3 The ATVG has been designed to comply 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. For more detail on how the ATVG meets these four requirements and to see accompanying visuals of the ATVG user interface (as shared in our 2020 report), please see Annex B.
- 3.4 For those consumers who do not currently have a Freeview Play device (or are in the minority of consumers with an existing Freeview Play device that is not compatible with the ATVG), advertised devices are available from as little as £80 (see Annex A for full list of compatible devices).

Availability of the Accessible TV Guide on existing Freeview Play devices

- 3.5 The ATVG was successfully launched to 53% of connected Freeview Play devices in October 2020 (based on market share at that time), as reported in last years' submission.
- 3.6 Following this, between September and December 2021, we launched the full version of the ATVG to further devices, giving a total of 60% of connected Freeview Play devices (based on October 2021 market share), and a modified version of the ATVG (without TTS) to a further 34% of devices, resulting in 94% coverage of connected Freeview Play devices in the market.
- 3.7 Our decision to launch a non-TTS version of the ATVG was due to the technical complexity of implementing a product across a wide range of devices with different technical set-ups. Digital UK operates a business model that offers its partners flexibility when implementing Freeview Play product requirements. This allows those partners to retain clear brand identity and the ability to differentiate in the competitive consumer electronics market. This approach is integral to the commercial value exchange we agree with our partners, however, as a result, technical implementations of Freeview Play can vary considerably from manufacturer to manufacturer.

- 3.8 For the most part, the ATVG has successfully overcome the challenges that this presents, however further investigation into TTS implementation unearthed unforeseen additional levels of complexity. Whilst TTS is an incredibly important feature, and a key part of the ATVG design, we felt strongly that this complexity should not inhibit the ability of consumers to access the wider benefits that the ATVG design offers, and therefore made the decision to develop and release a modified non-TTS version.
- 3.9 We continue to hold ongoing conversations with manufacturers about releasing the ATVG to the final 6% of existing connected devices and upgrading non-TTS versions to the full ATVG product. This will depend on technical and commercial feasibility.
- 3.10 Consumers can see a full list of compatible devices on our [website](#) (also listed in Annex A). This clearly differentiates between those models with and without TTS to enable consumers to make informed purchase decisions based on their specific accessibility needs.

Availability of the Accessible TV Guide on future Freeview Play devices

- 3.11 In January 2021 the ATVG was added to the Freeview Play conformance process (the device test manufacturers must take before we give new device models the Freeview Play trademark) meaning new device models may be rejected if they are unable to support this feature.
- 3.12 Since this point, all new device models from all but one manufacturer have had access to the ATVG, though due to the complexities implementing TTS (as outlined in paragraph 3.7), there are two 2021 device models that have launched with the modified non-TTS version (although, as high-end models, they include TTS as part of the native UI). Collectively these models represent a small minority of devices in the market, and we are working closely with the manufacturers in hope of resolving this issue.
- 3.13 Going forward, we expect all future Freeview Play devices to meet our conformance requirements, therefore having access to the ATVG once connected to the internet. We will continue to update the list of compatible devices on our website accordingly.

Response to the launch of the Accessible TV Guide

- 3.14 The response to the ATVG from users has been hugely positive, with the product being promoted and / or reviewed by several prominent advocacy groups such as [AbilityNet](#), [Henshaws](#) and [Hearing Link](#).
- 3.15 We have recorded over 35,000 monthly users as of October 2021 and saw a significant uplift following the launch of our modified non-TTS version in September, validating the decision to prioritise scale of availability. As this figure is based on those users who opt-in to data tracking, which we estimate to be under 20%, real usage levels are likely much higher.

- 3.16 We are also pleased and honoured to have won the award for ‘Advancing the TV User Experience’ at the Videonet Connected TV Awards 2020, which acknowledged the ATVG as a *“laudable application of available technology to make a real difference for such viewers, demonstrating the importance of overall usability in viewer experience design”*.

Future developments

- 3.17 Following further work on TTS implementation, which will be our initial priority, we look to further enhance the ATVG service through the inclusion of On-Demand content – dependent on readiness of the content providers.
- 3.18 We will also work to refine core features following further user feedback, and to explore incorporating additional accessibility features such as audio feedback enhancements and different colour modes / stylesheets to reflect the needs of varying visual impairments.
- 3.19 We also plan to improve the user journey by adding a demo video upon first use which ensures the consumer is aware of the product functionality and makes it easier to navigate when using for the first time.

4. EPG accessibility on Freeview native device UIs (traditional EPG)

- 4.1 Digital UK continues to include native UI accessibility requirements in its requirements document for Freeview Play (the Product Overview Document or POD) and is encouraging manufacturer partners to adhere to these guidelines wherever possible. However, as we do not own the native UIs of FVP devices, we cannot guarantee the implementation of these features, and have therefore focused our resource on supporting and enhancing the ATVG service as the means to deliver accessible EPG services to our viewers.

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 will continue to work closely with content provider partners to raise awareness of gaps in metadata for accessible on-demand programming.

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 list and regular grid views and highlights accessible programming available via a user's TV.

We are also continuing to prioritise accessibility, inclusive design and SEO best practice more generally across the Freeview website. To this end, we are working on a project with our agency to audit and optimise the Freeview site for Core Web Vitals (CWV) – Google's latest algorithm which focuses on real-world user experience.

We plan to roll-out these updates at end- of November 2021 and will continue to benchmark our site performance as part of our BAU KPIs.

- 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. Access services flags (S, SL & AD) are included on the more programme information screen, highlighting accessible programming available via a user's TV.
- 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.

Annex A: Device Brands with Accessible TV Guide (Correct as of 14th December 2021*)

Brand	ATVG with text-to-speech	ATVG without text-to-speech
Avtex	2018 TVs	
Avtex	2018 TVs	
Blaupunkt	2020 Android TVs	
Bush	2019 TVs; 2020 Android TVs	2016 / 2017 / 2018 TVs; 2020 non-Android TVs
Celcus		2016 / 2018 TVs
Cello	2019, 2020 TVs	
Digihome	2019 TVs	2016 / 2017 / 2018 / 2020 TVs
EDUK		2018 TVs
ElectriQ	2019 TVs	2016 / 2017 / 2018 TVs
Emotion	2020 Android TVs	
Eternity	2020 Android TVs	
Ferguson		2020 Fire TVs
Finlux	2019 TVs	2016 / 2017 / 2018 TVs
Hisense	2016 / some 2019 / 2020 / 2021 TVs	2017 / some 2018 TVs
Hitachi	2019 TVs	2016 / 2017 / 2018 / 2020 TVs
Humax	All Freeview Play boxes	
JVC	2019 TVs; 2020 Android TVs	2016 / 2017 / 2018 TVs; 2020 non-Android TVs
Laurus		2016 / 2017 / 2018 TVs
LG	All Freeview Play TVs except 2021 LM21A / LM21U models	2021 LM21A / LM21U models
Linsar	Some 2018 TVs / some 2020 TVs	2016 / 2017 / some 2018 / some 2020 TVs
Loewe	All Freeview Play TVs	
Logik	2019 TVs; 2020 Android TVs	2016 / 2017 / 2018 TVs; 2020 non-Android TVs
Luxor	2019 TVs	2016 / 2017 / 2018 / 2020 TVs
M&B	2019 TVs	2017 / 2018 TVs
Manhattan	All Freeview Play boxes	
Marlin	2019 TVs	2018 TVs
Medion	2019 TVs	2017 / 2018 TVs
Mitchell & Brown	2019 TVs	2016 / 2017 / 2018 / 2020 TVs
Netgem	All Freeview Play boxes	
Nordmende	2019 TVs	2017 / 2018 / 2020 TVs

Panasonic	2015 / 2016 / some 2017 / some 2018 / some 2019 / some 2020 TVs	Recorder box; Some 2017 / some 2018 / some 2020 TVs
Philips	2019 / 2020 Android TVs	
Polaroid	Some 2018 / 2019 TVs; 2020 Android TVs	2016 / 2017 / some 2018 TVs; 2020 non-Android TVs
RCA	2020 Android TVs	
Rediffusion	2020 Android TVs	
Sharp	2018 TVs; 2020 Android TVs	2017 TVs
Solas	2019 TVs	
Sony	All Sony Freeview Play Android TVs	All Sony Freeview Play non-Android TVs
TCL	2018 / 2019 TVs; 2020 / 2021 Android TVs	
Technika	2020 Android TVs	
Techwood	2019 TVs	2016 / 2017 / 2018 / 2020 TVs
Telefunken		2016 TVs
Toshiba	2019 TVs	2016 / 2017 / 2018 / 2020 TVs
UMC	2020 Android TVs	
Veltech	2020 Android TVs	
Vistech		2016 / 2017 / 2018 / 2020 TVs
Walker	2019 TVs	2016 / 2017 / 2018 / 2020 TVs
Westinghouse	2020 Android TVs	

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

Annex B: Accessible TV Guide Feature Detail & Visuals

The ATVG provides the four accessibility features identified in the EPG code in the following ways:

- 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.

Fig 1: Accessibility Preferences Screen

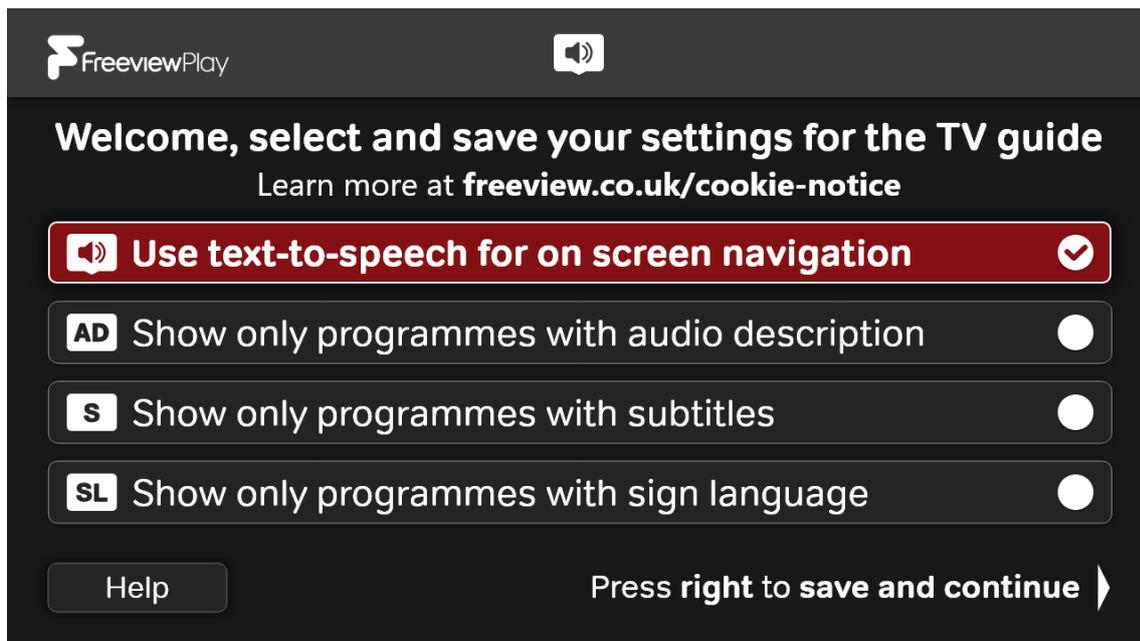


Fig 2: Text-to-Speech Settings

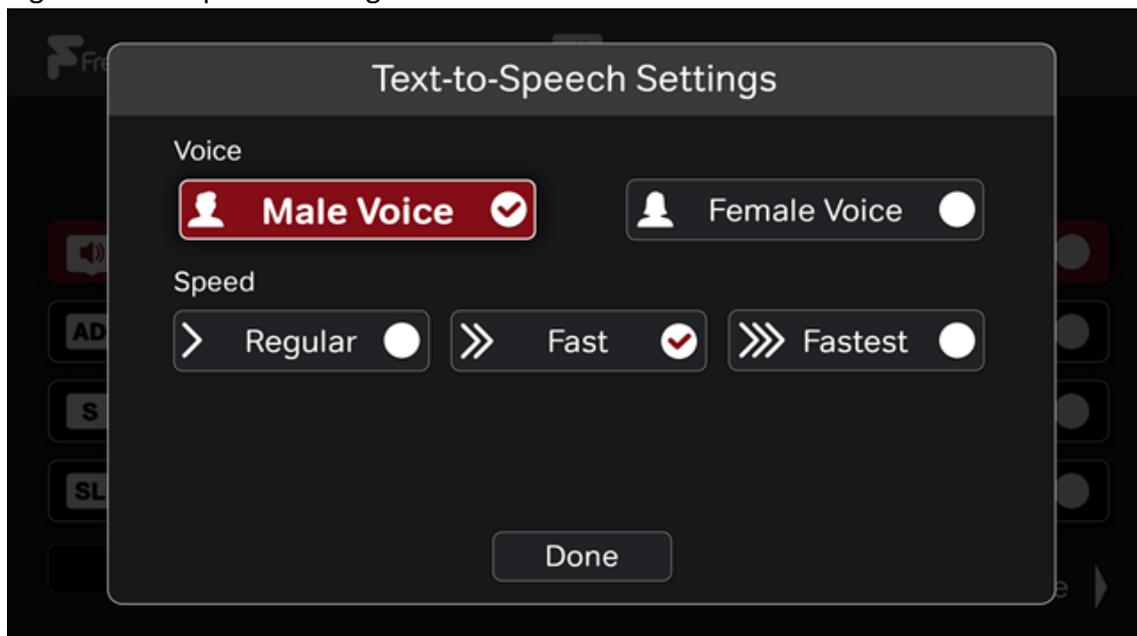


Fig 3: EPG Screen

